



## **Detailed Scoping Report for the PolyMet Land Exchange**

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## Acronyms and Abbreviations

CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DEIS	Draft Environmental Impact Statement (November 2009)
DNR	Department of Natural Resources
EIS	Environmental Impact Statement
FA	Feasibility Analysis (November 2009)
FEIS	Final Environmental Impact Statement
LTVSMC	LTV Steel Mining Company
NEPA	National Environmental Protection Act
NOI	Notice of Intent
NorthMet	NorthMet Mine and Ore Processing Facilities Project
PolyMet	PolyMet Mining, Incorporated
SDEIS	Supplemental Draft Environmental Impact Statement
SNF	Superior National Forest
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service

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## **EXECUTIVE SUMMARY**

This report summarizes the comment scoping process and results for the proposed PolyMet land exchange with the United States Forest Service Superior National Forest.

The proposed NorthMet mine site is located on national forest lands under which PolyMet leases private sub-surface mineral rights. The United States Forest Service has joined the Minnesota Department of Natural Resources and United States Army Corps of Engineers as a Co-lead agency to complete the environmental impact statement process for the NorthMet project. The land exchange will address the proposed transfer of approximately 6,650 acres of federal land from public to private ownership and approximately 6,722 acres of land from private to public ownership. The purpose and need for the land exchange is to eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate.

Scoping is the first step and an integral part of the environmental impact statement process. The public was notified of the proposed land exchange on October 13, 2010 through a Notice of Intent published in the Federal Register, which identified the 45-day scoping comment period. A scoping letter and information packet was distributed to the public by the United States Forest Service and was accompanied by public scoping open house sessions. Tribal and other Cooperating Agencies were briefed by the Co-lead Agencies.

A total of 1,451 comment submissions were received. These submissions were logged into an electronic database. A total of 1,177 discrete comments were identified, coded by resource topic, analyzed, and were used to identify issues. Issues identified as substantive were used to develop alternatives and non-substantive issues will be carried forward and addressed in the supplemental draft environmental impact statement. Requests for information were also identified.

Impact analysis will be completed for the proposed land exchange and the results will be incorporated into the supplemental draft environmental impact statement. The supplemental draft environmental impact statement is anticipated for release to the public in Fall 2011 with a comment period and public meetings to follow. Following analysis of further public comments on the supplemental draft environmental impact statement, a final environmental impact statement will be released in 2012.

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## 1.0 INTRODUCTION

### 1.1 Overview

This report summarizes the scoping process and comments received on the proposed project. Scoping is the first step and an integral part of the federal Environmental Impact Statement (EIS) process. It is “an early and open process for determining the issues to be addressed and for identifying the significant issues related to a proposed action” (40 CFR Part 1501.7). The purpose of scoping is to allow the public, agencies, and interested parties to comment on the range of issues to be addressed during the environmental review process. During the scoping process, the federal agency presents the broad outline of a project and solicits input, which includes issues, concerns, and opportunities that might arise as a result of project implementation. Comments received during scoping help the agency identify substantive issues, determine the level of analysis needed, and develop reasonable alternatives.

This report summarizes comments, feedback, and input received from the public, agencies, and other interested parties during the public scoping period for the proposed land exchange between the United States Department of Agriculture, Forest Service (USFS) Superior National Forest (SNF) and PolyMet Mining, Incorporated (PolyMet). During scoping, USFS actively sought to engage potentially affected or interested federal, state, and local agencies; Native American tribes; and the public. All comments received by the USFS prior to March 31, 2011 were processed and included in this scoping report. Comments received after that date were still considered by the USFS and incorporated into the administrative record.

### 1.2 Project Background

The original Notice of Intent (NOI) to prepare an EIS for PolyMet’s proposed NorthMet Mine and Ore Processing Facilities Project (NorthMet) was published by the United States Army Corps of Engineers (USACE) in Volume 70, Number 126 of the Federal Register, pages 38,122–38,123, July 1, 2005. A Supplemental DEIS (SDEIS) will supplement and supercede the DEIS that was published by the USACE and Minnesota Department of Natural Resources (DNR) in November 2009 for the proposed project. The SDEIS, which will include analysis of a revised mining proposal and the proposed land exchange, is currently being developed for release later this year.

The NorthMet project includes a proposal to construct and operate an open pit mine, an ore processing plant, and tailings basin, near Babbitt and Hoyt Lakes in St. Louis County, Minnesota. The NorthMet project has been proposed to produce base and precious metals, precipitates, and flotation concentrates from ore mined at the NorthMet deposit by uninterrupted operation of the former LTV Steel Mining Company (LTVSMC) processing plant site. The processed resources would help meet domestic and global demand by sale of these products to domestic and world markets. PolyMet has applied to the St. Paul District of the USACE for a permit to discharge fill material into waters of the United States, including jurisdictional wetlands, to facilitate the construction and operation of an open pit copper/nickel/cobalt/precious metals

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mine in the low grade poly-metallic disseminated magmatic sulfide NorthMet deposit in northeastern Minnesota, approximately 6 miles south of the town of Babbitt.

The SDEIS will respond to concerns about wetlands and water quality issues associated with the NorthMet mining and ore processing proposal, as identified by the United States Environmental Protection Agency (USEPA) and other commentors. In addition, the SDEIS will also incorporate potential effects from the proposed land exchange between the USFS SNF and PolyMet. The USFS has joined the USACE and DNR as a third Co-lead agency responsible for the SDEIS preparation due to USFS ownership of the land where the mine is proposed.

During the October 2010 NOI scoping process for the SDEIS, the USACE and USFS limited scoping comments to the proposed land exchange. Comments had already been received in response to the original scoping notice of October 25, 2005, and in response to the DEIS of October 27, 2009. The proposed mining and ore processing action still fell within the scope of analysis identified in the October 25, 2005 Final Scoping Decision Document, produced jointly with the DNR.

The proposed land exchange is considered a “connected action” to the NorthMet project; meaning that it is considered part of the overall project proposal and therefore will be included in the analysis of environmental impacts. The proposed NorthMet mine site would affect national forest lands under which PolyMet leases private sub-surface mineral rights. The land exchange would transfer approximately 6,650 acres of federal land from public to private ownership, and approximately 6,722 acres of land from private to public ownership.

Most of the lands involved in the NorthMet project were acquired by the United States under the authority of the Weeks Act of 1911, which restricts the USFS from allowing, by decision, surface mining as proposed by PolyMet.

As proposed, the NorthMet project would involve approximately 2,840 acres currently in federal surface ownership which are managed by the USFS as part of the SNF (see Figure 1). In addition to national forest lands encompassed in the proposed NorthMet mine site, the USFS proposes to include an additional 3,810 acres of federal property in the land exchange as a means to achieve a spatial land pattern that improves management effectiveness. Many of these federal lands have been adjacent to lands impacted by past and ongoing mining activities.

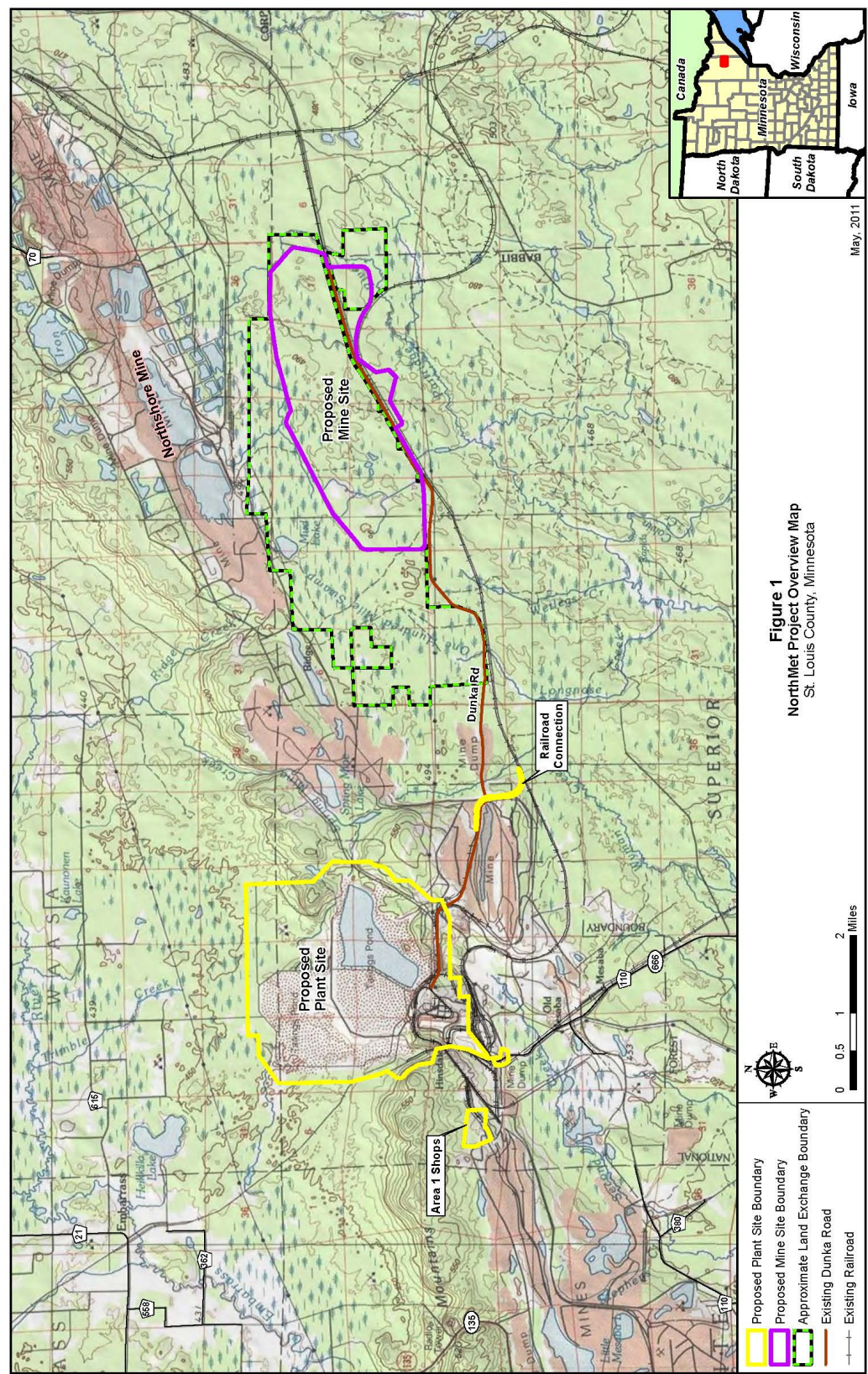
The non-federal lands offered for consideration by PolyMet are located throughout the SNF and would complement existing federal ownership by eliminating or reducing private inholdings. The non-federal tracts also consist of forest and wetland habitat as well as some lake frontage and could potentially enhance public recreation opportunities.

### 1.3 Purpose of and Need for the Proposed Action

The purpose of and need for the proposed land exchange is to eliminate conflicts between the United States and the private mineral estate. PolyMet maintains that the mineral estate



Figure 1: Project Overview Map





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includes the right to surface mine. The USFS has concluded that it lacks authority to allow, by decision, surface mining as proposed by PolyMet. The only way for an open pit mine to be implemented is for the lands in question to be exchanged out of federal ownership. The proposed land exchange would unite surface and mineral rights.

Another need for the land exchange is to achieve a spatial land pattern that improves management effectiveness by consolidating land ownership, eliminating conflicts, improving public access to federal lands, and reducing boundary lines. The exchange would promote consolidation of USFS lands where nonfederal parcels would be acquired. The exchange would avoid fragmentation that would occur if only the proposed NorthMet mine site (2,840 acres instead of proposed 6,650 acres) were exchanged out of federal ownership.

The proposal meets three Forest Service Strategic Plan goals: (1) provide and sustain benefits to the American people (desired outcome is forests with sufficient long-term multiple socioeconomic benefits to meet the needs of society); (2) conserve open space; and (3) sustain and enhance outdoor recreation opportunities.

#### 1.4 Project Location and Parcels Proposed for Exchange

A feasibility analysis was completed (November, 2009) by the USFS for the proposed land exchange between the USFS and PolyMet. One federal and two non-federal tracts were evaluated for compliance with the 2004 Superior National Forest Land and Resources Management Plan. Current and future uses of these land tracts were considered in this evaluation. A preliminary valuation suggested that additional parcels would be needed to bring the market value of federal and non-federal lands within the limits required for an exchange. Three non-federal tracts were subsequently added to the proposed land exchange after the feasibility analysis. These tracts were also evaluated for compliance by the same criteria used in the feasibility analysis.

As previously stated, the land exchange would transfer approximately 6,650 acres of federal lands from public to private ownership, and approximately 6,722 acres of land from private to public ownership. Below is a description of the federal and non-federal lands that would be involved in the land exchange.

##### 1.4.1 Federal Lands

The federal lands consist of a single contiguous tract of mostly forested land. This tract is about 6,650 acres in size and is located in the west/central part of the SNF within the Laurentian Ranger District in the historic Iron Range of Northeastern Minnesota. The parcel is located in T59N/R12W Sections 1-12, 17, and 18; T59N/R13W Sections 6 and 7; and T60N/R13W Sections 33, 34, and 35 (see Appendix A for maps). The tract lies immediately south of the SNF proclamation boundary and is bounded on the south by the former LTVSMC railroad and Dunka Road. Dunka Road is a private road with sections owned and leased by Cliffs Erie, PolyMet, and Minnesota Power. Access is primarily via Dunka Road and the LTVSMC railroad. The federal

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lands encompass many acres of the 100-mile Swamp, a large black spruce, tamarack and cedar wetland. Yelp Creek and the Partridge River flow through the tract. Mud Lake is also located on the federal land.

#### 1.4.2 Non-federal Lands

The non-federal lands include five different tracts of land that total approximately 6,722 acres and include predominantly forest and wetland habitat (see Appendix A for maps). These lands proposed for exchange are located throughout the SNF in St. Louis, Lake, and Cook Counties. All tracts were assembled by PolyMet for the purpose of this proposed exchange and were screened by the USFS.

Tracts were screened for selection based on USFS criteria for acquisition as identified in the 2004 Superior National Forest Land and Resources Management Plan. Additional considerations included wetland acres, ownership consolidation, and compatibility with USFS land management goals. Parcels were matched to the federal lands on an equal value basis (based on a preliminary valuation) and not on the basis of acreage.

The largest nonfederal tract, identified as Tract 1, consists of approximately 4,650 acres (“Hay Lake” tract), located on the southeastern portion of the Laurentian Ranger District, west of and adjoining County Road 715 and north of the town of Biwabik in St. Louis County. The Hay Lake tract includes Hay Lake, identified as a Wild Rice Water by the DNR, and Little Rice Lake, which is used by trumpeter swans, a State Threatened species. Approximately eight miles of the upper Pike River flow through Tract 1.

Tract 2 (“Lake County” lands) consists of approximately 320 acres of land formerly owned by Lake County. The tract includes various 40-acre parcels on the Laurentian Ranger District southeast of Seven Beaver Lake that are mostly surrounded by SNF lands and offer significant wetland habitat.

Tract 3 (“Wolf” lands) consists of approximately 1,560 acres of land on the Laurentian and Tofte Ranger Districts, west and southwest of Isabella. The tract includes four separate parcels that block in or complement SNF ownership and, like Tract 2, offer significant wetland habitat.

Tract 4 (“Hunting Club” lands) consists of approximately 160 acres on the LaCroix Ranger District, 5 miles southwest of Crane Lake. Two small unnamed lakes are partially included in the tract, as well as a large percentage of wetland habitats. Tract 4 is surrounded by the SNF, St. Louis County lands, and private ownership.

Tract 5 (“McFarland Lake”) consists of approximately 32 acres on the Gunflint Ranger District in northeastern Cook County. The tract blocks in SNF ownership and includes lakefront property on McFarland Lake, an entry point to the Boundary Waters Canoe Area Wilderness. Access to the property is available by water from a landing off County Road 16 (Arrowhead Trail) approximately 10 miles north of Hovland.

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## 2.0 Scoping Process

### 2.1 Objectives

The objective of the scoping process is to provide the public with an opportunity to comment on the proposed land exchange, and use the comments submitted to identify significant issues and develop potential alternatives.

Scoping is the first step and an integral part of the EIS process. The objectives of the scoping process are to:

- Increase public awareness and understanding of the Proposed Action;
- Engage the tribal, federal, state, and local governments and the public in the early identification of concerns, potential impacts, and possible alternative actions;
- Identify potentially significant issues related to the Proposed Action;
- Determine issues that guide alternative development and/or mitigation;
- Identify and eliminate issues that are out of the scope of this process;
- Identify the scope of process-related issues that are to be addressed and integrate analyses required by other environmental laws (e.g., Clean Water Act, Endangered Species Act, National Historic Preservation Act); and
- Identify issues to be addressed by means of technical studies (e.g., potential impacts to air quality, visual resources, watersheds, etc.).

### 2.2 Description of Scoping Process

The following section describes methods used to involve the public, notify them of scoping meetings, and facilitate exchange of current project information throughout the planning process.

#### 2.2.1 Notice of Intent

The public was notified of the land exchange project on October 13, 2010 through a NOI which was published in the Federal Register (Vol. 75, No. 197). The NOI announced the intent to prepare a SDEIS for the NorthMet project proposed by PolyMet (see Appendix B). The SDEIS will include an analysis of the proposed land exchange between PolyMet and the USFS. The SDEIS will supplement and supersede the DEIS, which was produced jointly by the USACE and DNR and was released for public comment on November 6, 2009.

The NOI identified the 45-day scoping comment period to occur in October and November of 2010. The NOI also stated that the scoping notices would be placed in the newspaper of record, scoping packages would be mailed to interested and affected parties, and posting of the project would be on the agency's project planning web pages and noticed in the USFS quarterly schedule of proposed actions.

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### 2.2.2 Scoping Material Mailing

The USFS created a scoping letter and information packet which was distributed to interested members of the public on October 12, 2010, with a second mailing on October 14 containing corrected map information (see Appendix A). These materials included general information on the proposed land exchange, a summary of the scoping process, notification of the public open house sessions, instructions for submittal of comments, and a blank comment form.

### 2.2.3 Press Release and Media Outreach

The USFS issued a press release on October 15, 2010 (see Appendix C). This press release provided information on the open house meetings and how to submit comments to the USFS. News media stations such as WDIO and WTIP distributed this information.

### 2.2.4 Public Scoping Open House Sessions

Two open house information sessions were held in separate locations. At each scoping meeting, representatives from the USFS, USACE, DNR, PolyMet, and the Co-lead Agencies' third party consultants provided information on the NEPA process, the proposed project and land exchange, and how to provide scoping comments. Display boards were provided showing information on the EIS process, timeline, project description, land exchange, and public comment process. An open house atmosphere was maintained during which attendees could review the display boards and speak informally to project team members.

Session attendees were encouraged to ask questions and provide comments during the sessions. Comment forms were available for attendees to provide written comments at the time of the session or to return by mail. Locations, dates, and attendance of each public session are provided in Table 1 on the next page. Sign-in sheets from the public sessions are provided in Appendix D. Scoping session materials such as the display boards are provided in Appendix E.



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**Table 1** Public Scoping Session Information

<b>Location</b>	<b>Date</b>	<b>Number in Attendance</b>	<b>Attendees that Requested to be Added to Mailing List</b>
Hoyt Lakes, Minnesota at the Mesabi East High School	October 26, 2010	45	31
New Brighton, Minnesota at the New Brighton Community Center	October 27, 2010	27	20

### 2.2.5 Superior National Forest Website

Information regarding the proposed land exchange was published on the USFS SNF website listed below and includes the project summary, federal and non-federal parcel maps, the NOI, scoping material packet sent to interested parties, supporting documents such as excerpts from the Feasibility Analyses (FA), and aerial photos of the parcels. This information can be accessed via the quicklinks at the following webpage:

[www.fs.usda.gov/goto/superior/projects](http://www.fs.usda.gov/goto/superior/projects)

### 2.2.6 Other Agency Coordination & Tribal Interactions/Consultations

Tribal Cooperating Agencies and the USEPA were briefed on the land exchange by the Lead Agencies on December 16, 2010. Information was presented in a format similar to the open house sessions, with additional discussion provided by the USFS, USACE, and DNR.

## 3.0 RESPONSE SUBMITTALS

### 3.1 Introduction

This section provides: (1) summaries of the method used to organize and analyze comments; (2) the number of comments received and; (3) the number of issues identified within those comments. All the scoping comments documented in this report were received or postmarked by March 31, 2011.

Comments regarding the proposed project and alternatives to the proposed project will be considered by the USFS in refining the land exchange for the proposed NorthMet project. This will serve as the basis for assessing impacts. The Council on Environmental Quality (CEQ) regulations implementing NEPA requires an analysis of available alternative actions prior to selecting the preferred alternative action. Input on alternatives will be considered in the

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analysis and text of the SDEIS. The SDEIS will describe which alternatives were considered but were not carried forward for detailed analysis in the SDEIS.

The CEQ regulations require an analysis of the project impacts on the “human environment.” These impacts include effects on natural, human, and cultural resources. Discussions with affected public or agencies, such as those that have occurred through this scoping effort, help to define and evaluate effects of the different alternatives on the human environment. Comments relating to environmental impacts will be considered by the USFS in developing the scope of SDEIS technical studies. Issues identified through the comments will be addressed in the Land Exchange Existing Conditions and Land Exchange Environmental Consequences chapters of the SDEIS.

Some comments may be considered outside the scope of this SDEIS if: (1) the issue relates to facilities not included in this project; (2) the issue is not within the jurisdiction of USFS to resolve; or (3) the issue cannot be reasonably addressed within the scope of this process or is being addressed through a separate NEPA process. In addition, there were widely differing personal opinions about the proposed project, mining, the USFS, and other topics. These comments were also considered outside the scope of the SDEIS and will not be addressed.

In identifying discrete comments and issues, it is important to note that the consideration of public comments is not a vote-counting process. Every comment and suggestion has value, whether expressed by one or a thousand respondents. All input is considered, and the USFS attempts to capture all substantive issues in the analysis process described below.

### 3.2 Submission Processing

Unique submissions were logged and names and addresses were entered into a mailing list database. The logging process was also used to identify and eliminate duplicate responses. All duplicates identified during this phase were labeled and filed with the original submission.

In order to classify submissions as unique or form letters, a text analysis tool was used to search submissions for matching blocks of text. Three primary form letters were identified. Even if considered a form letter, all submissions were reviewed for variations and additional language so that all comments were identified. A total of 1,451 submissions were received by the USFS, USACE, and DNR. See Table 2 below for a breakdown of submission types and totals.

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**Table 2 Comment Submission Breakdown by Type**

Submission Type	Number of Submissions
Form Letter 1	539
Form Letter 2	10
Form Letter 3	705
Unique Submissions	197

Measures were taken to ensure quality control. Submission processing and coding was reviewed and the submission database was checked using a standard statistical approach.

### 3.3 Geographic Origin and Organizational Grouping of Submissions

Comment submissions were submitted by letter, email, fax, telephone call, and USFS electronic submittal form. Of the submissions in which demographic information was available, approximately 13 percent of the submissions came from Lake, Cook, and St. Louis Counties. Other counties in Minnesota accounted for 79 percent of the submissions, with the remaining 8 percent coming from outside of Minnesota. See Table 3 below for the geographic origin of the comments and Table 4 below for the sources of the comments.

**Table 3 Geographic Distribution of Comment Submissions**

Origin	Number of Submissions <sup>1</sup>
Lake, Cook, and St. Louis Counties	139
Other Minnesota Counties	873
Outside of Minnesota	92

1. Number of submissions may include duplicate submissions and excludes submissions which did not include contact/demographic information.

**Table 4 Sources of Comment Submissions**

Origin	Number of Submissions <sup>1</sup>
Businesses	16
Individuals	1383
Local Government Units	8
Non-government organizations	34
Tribes	10

1. This includes emails and possible duplicates.

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### 3.4 Submissions Collected at Open Houses

During the public open house meetings, comment forms were provided. See Appendix A for an example of this form. These forms were also included in the scoping material mailing. Members of the public were encouraged to comment on the project either by leaving the form in the provided drop box (8 forms collected) or mailing it in (16 forms collected).

### 3.5 Comment Coding

Once a comment submission was logged and entered into the comment database, it was reviewed and separated into discrete comments according to the topic area (code) to which they pertained. Approximately 1,177 discrete comments were identified. The content of each comment was examined and assigned at least 1 of 23 possible category codes. Table 5 below lists the code categories and number of comments identified in each. Each coded comment within the submission was also assigned a discrete number for tracking purposes.

Using the reports found in Appendix F, a commenter should be able to identify their submission number, specific comments, and which issue statements or information requests in which their comment(s) was included.

The identification and categorization of individual comments is a subjective process, however every effort was made to ensure that all public input was carefully considered and placed in the most appropriate issue category possible, given the spirit and context of each comment. Comments within each category will be used by the agencies to inform the development of the SDEIS.



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**Table 5** Count of Discrete Comments by Category

Topics	Code	Number of Comments <sup>1</sup>
Air Quality and Noise	AIR	11
Alternatives for Consideration	ALT	26
Climate Change and Carbon Accounting	CCC	13
Conformance with USFS Plans and Objectives	PLN	81
Contamination Issues and Phase I/II Assessments	HAZ	10
Cultural Resource Impacts	CUI	35
Cumulative Impacts	CUM	26
Ecological Value	ECO	8
Feasibility Analysis	FEA	6
Forest Resources	FOR	15
General SDEIS Analysis	GSA	37
Market Value and Land Use	MRK	120
Mine Project and DEIS Issues	MPD	102
Mineral Rights and Legal Authorities	LEG	47
NEPA Process and Requirements	NPR	39
Out of Scope	OOS	13
Public Access Concerns	PAC	7
Socioeconomic Impacts	SOC	36
Statement of Opinion	SOO	372
Threatened and Endangered Species	TES	35
Vegetation, Wildlife, and Habitat Impacts	VWH	31
Water Resources	WAT	46
Wetland Resources	WET	60

1. Comments may have been assigned multiple topic codes.

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## 4.0 CONTENT ANALYSIS OF PUBLIC COMMENTS

The purpose of analyzing public comments was to identify questions and further data needs, identify substantive and non-substantive issues, and develop alternatives to the proposed action.

### 4.1 Identification of Issues

Issues are defined as points of disagreement, debate, or dispute about the potential effects of a proposed activity and are based on some anticipated outcome. Substantive issues are used to identify potential mitigation measures and develop alternatives. These issues are considered substantive because of the extent, duration, or intensity of potential resource impacts. Non-substantive issues are those that are not within the scope of the proposed action, are not relevant to the decision to be made, are already decided by law, regulation, or policy, are conjectural or unsupported by scientific evidence, or are limited in extent, duration, and intensity. Though they may not drive the development of alternatives or mitigation measures, many non-substantive issues are still important and will be used to refine the comparative analysis of alternatives in the context of a given resource.

After comments were coded as described in Section 3.0, the comments from each category were analyzed. Comments within each category were aggregated into groups that shared a common theme. The comments that comprised these themes were used to develop single issue statements that were descriptive of all their constituent comments. These issue statements are listed in Table 6 (see Appendix G) along with the disposition of each issue.

Comments that were information requests are listed in Table 7 (see Appendix G).

### 4.2 Substantive Issues

Substantive issues are those used to develop mitigation measures and alternatives. See Table 6 in Appendix G for a breakdown of which issue statements were considered substantive and will be further analyzed and discussed in the SDEIS. Provided below are the eight issues determined to be substantive. In addition, the specific comments relating to these issues and representative comments to further describe the issue are listed below.

#### **1. Exchange federal land for a single contiguous nonfederal parcel of at least 6,650 acres with higher ecological and monetary value** (249-6, 315-9, 433-1)

Commenters noted that the federal parcel to be traded was one contiguous parcel but the non-federal lands to be traded in were smaller, discrete tracts. Commenters suggested that a single parcel of at least 6,650 acres of non-federal land be considered for the exchange.

Representative comments follow:

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- “Although the federal land in the proposed land exchange is one contiguous area, the non-federal lands to be acquired are in five different tracts. Further, many of these tracts consist of a number of parcels, resulting in even smaller portions of non-federal land as part of the exchange.” (249-6)
  - “The Forest Service should identify a parcel of land to evaluate as an alternative to the offered land that is a minimum 6,650-acre contiguous parcel. Many environmental benefits depend on or are enhanced by the size and contiguousness of conserved land, including, for example, all types of habitat, the ability for wildlife to migrate or travel, and preserving roadless areas. The federal land proposed for exchange is 6,650 acres of contiguous land. A parcel of continuous land of at least equal size should be identified for evaluation as an alternative.” (315-9)

## **2. PolyMet would extract minerals through underground mining and other alternative methods of mineral extraction.**

(170-1, 277-3, 280-2, 283-15, 315-9, 356-6, 452-9, 555-5, 585-4, 627-50, 627-51)

Commenters suggested that further analysis is needed regarding underground mining and other methods of mineral extraction. The economic viability of this alternative is not a viable rationale for elimination of this potential alternative. Representative comments follow:

- “The Band expects that a serious analysis of the technical feasibility of underground mining at this site be conducted as part of the NEP\process, as the cost of an alternative is not sufficient to exclude an alternative from environmental analysis.” (277-3)
- “...the DEIS did not evaluate the alternative of accessing the mineral resource through means other than the proposed open pit mine. This basic alternative - even if it relies on a future technology - must be evaluated in the SEIS for the land exchange.” (315-9)
- “USFS should examine the need for an exchange. A more thorough analysis is required of the underground mine alternative, examining ore distribution, the economic viability of this option and the potential environmental impacts of an underground mine.” (585-4)

## **3. Exchange federal land for multiple nonfederal parcels that have wetlands and habitat more similar to the federal land than the proposed nonfederal parcels.**

(260-1, 345-3, 505-2, 566-16)

Commenters suggested that other non-federal parcels be considered for exchange in addition to or instead of the proposed parcels. Representative comments follow:

- “In respects to the land trade the mid and upper portion of the Cascade River in Cook County has some properties that I feel should be considered. Here is one that should be considered.” (345-3)
- “If the acquired land is in no danger of being developed in its current ownership, there really is no benefit to the swap. As a suggestion for a piece of land to acquire that is in

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possible danger of development, consider the private holdings on the ridge north of Eggers Lake just west of the Gunflint Trail. This is the second highest point in Minnesota (and has much higher vertical gain than Eagle Mountain) and should be protected.” (505-2)

**4. Exchange only the land required for the NorthMet mine project instead of the 6,650 acres of federal land proposed.**

(315-9, 356-6)

Commenters suggested that the 6,650 acre federal parcel is larger than necessary and should be reduced to 2,840 acres as proposed for the mine site. Representative comments follow:

- “Limit federal parcel to 2,840 acres. The land exchange notice indicates that the PolyMet project as proposed “would involve approximately 2,840 acres.” Limiting the federal exchange to this amount should be an alternative evaluated in the SEIS.” (315-9)
- “The Forest Service should also consider as an alternative a land exchange of only 2,840 acres of land. In the scoping notice, the Forest Service stated: “In addition to national forest lands encompassed in the proposed NorthMet mine site, the Forest Service proposes to include an additional 3,810 acres of federal property in the land exchange as a means to avoid intermingled and inefficient ownership patterns and eliminate conflicts if minerals development were to expand in the future.” Scoping Notice p. 1. The Forest Service should limit the proposed action to only the acreage needed for the proposed NorthMet mine. If the Forest Service does include an alternative that more than doubles the land exchange, it should alter its impacts analysis to include impacts for a mine twice as large as proposed.” (356-6)

**5. The land exchange conflicts with the federal trust obligation to honor treaties and tribal rights to hunt, fish, and gather on the Federal parcel.**

(282-74, 305-10, 323-8)

The land exchange may conflict with tribal rights, including usufructory rights, on the federal parcel. Representative comments follow:

- “Conflicts with Forest Plan requirements to protect watersheds, vegetation and wildlife will impact Tribal rights and resources. In addition, the Forest Plan contains provisions directly pertaining to Tribal usufructuary rights and Tribal cultural, social and economic interests. The PolyMet Land Exchange may not be determined to be in the public interest if it conflicts with the provisions of the Forest Plan specifically protecting Tribal rights and interests.” (282-74)

- 
- “The United States has also made treaties commitments to the Native Americans about the use of this land and resources which must be treated with great respect at the level of treaty negotiations. This is a huge legal issue.” (305-10)

**6. With reference to tribal rights and interests, cumulative impacts and the no-action alternative have not been adequately analyzed.**

(282-4, 282-75, 587-5)

Commenters suggest that potential cumulative impacts to tribal rights and interests, as well as impacts of a no-action alternative, be analyzed. Representative comments follow:

- “The SDEIS must analyze both a no action alternative that would preclude the PolyMet open pit mine and analyze cumulative impacts of the proposed PolyMet Land Exchange and other current and future mining developments impacting watersheds, air sheds, habitats and endangered species. The analysis must describe impacts on management objectives for adjacent and downstream national forest lands and Indian trust lands.” (282-4)
- “... analyze impacts to Tribal rights to hunt fish and gather in the Ceded Territories and Tribal Reservation resources at the following scales of impact:
  - Cumulative impacts of the PolyMet Land Exchange and future uses of the land and other current and future mining activities and developments;
  - A no action alternative preserving federal ownership and avoiding the PolyMet Project and other destruction of the Federal surface.” (282-75)

**7. Changes or loss of access can significantly impact tribal rights to hunt, fish, and gather in the Ceded Territories.**

(249-2, 277-10, 282-65, 311-7, 462-6, 592-1)

Within the Ceded Territories, tribal access and the ability to hunt, fish, and gather could be compromised by the land exchange. Commenters suggested further analysis of these potential impacts in the SDEIS. Representative comments follow:

- “The purpose of the scoping is to identify issues to be included in the environmental impact statement. We believe that effects of the project on the exercise of treaty rights and maintenance of tribal cultural practices are issues to be addressed. Tribes are sovereign nations, and by treaty with the United States retain rights to hunt, fish, and gather in the 1854 Ceded Territory. Band members continue to exercise these rights. The harvesting and use of natural resources is part of Ojibwa identity and culture. Any threat to the access and harvest of traditional plants and animals is seen as a threat to

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Ojibwa culture and the right of band members to exercise their cultural identity.” (249-2)

- “Access to treaty-protected resources is of prime importance to Band members. Loss of access to or use of public lands within the Ceded Territory can significantly impact exercise of treaty rights, and this issue should be thoroughly evaluated in the SDEIS process. The Band also looks forward to substantive discussions with the U.S. Forest Service as part of the Section 106 (National Historic Preservation Act) consultation process, in order to raise more specific concerns about cultural and natural resource impacts that would likely occur under the proposed land exchange.” (277-10)

**8. The SDEIS should analyze mining operations that are consistent with federal surface ownership and compare them to the project proposed by PolyMet.**

(315-3, 315-5, 356-4)

Commenters noted that analysis should include comparison of how other mining operations comply with surface mining restrictions without a land exchange. Representative comments follow:

- “The SEIS must clearly state and then analyze the difference between the environmental consequences of excavating mineral resources from the proposed federal land with and without the land exchange. As stated in the materials describing the land exchange, its purpose is to “eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate.” MCEA agrees that applicable federal law places land management responsibilities on the Forest Service which would preclude approval of the open pit mining operation as proposed by PolyMet. However, those land management responsibilities do not preclude all mining. The “private mineral estate” referenced in the Notice is available for PolyMet or other private owners to exploit through means other than an open pit mine under existing applicable law and without any need for a land exchange. To evaluate the land exchange, therefore, the SEIS must include an analysis of environmental impacts of extraction of the mineral resources with existing applicable restrictions compared to the environmental impacts of extraction of the mineral resources without those restrictions.” (315-3)
- “The required finding necessitates an analysis of the land exchange proposal that compares the exercise of private mineral rights (and realization of whatever’ benefits as well as impacts that may involve) under existing conditions (i.e., without the exchange) versus the exercise of private mineral rights if the exchange proceeds. To date, neither PolyMet nor any state or federal agency has evaluated the benefits and impacts of

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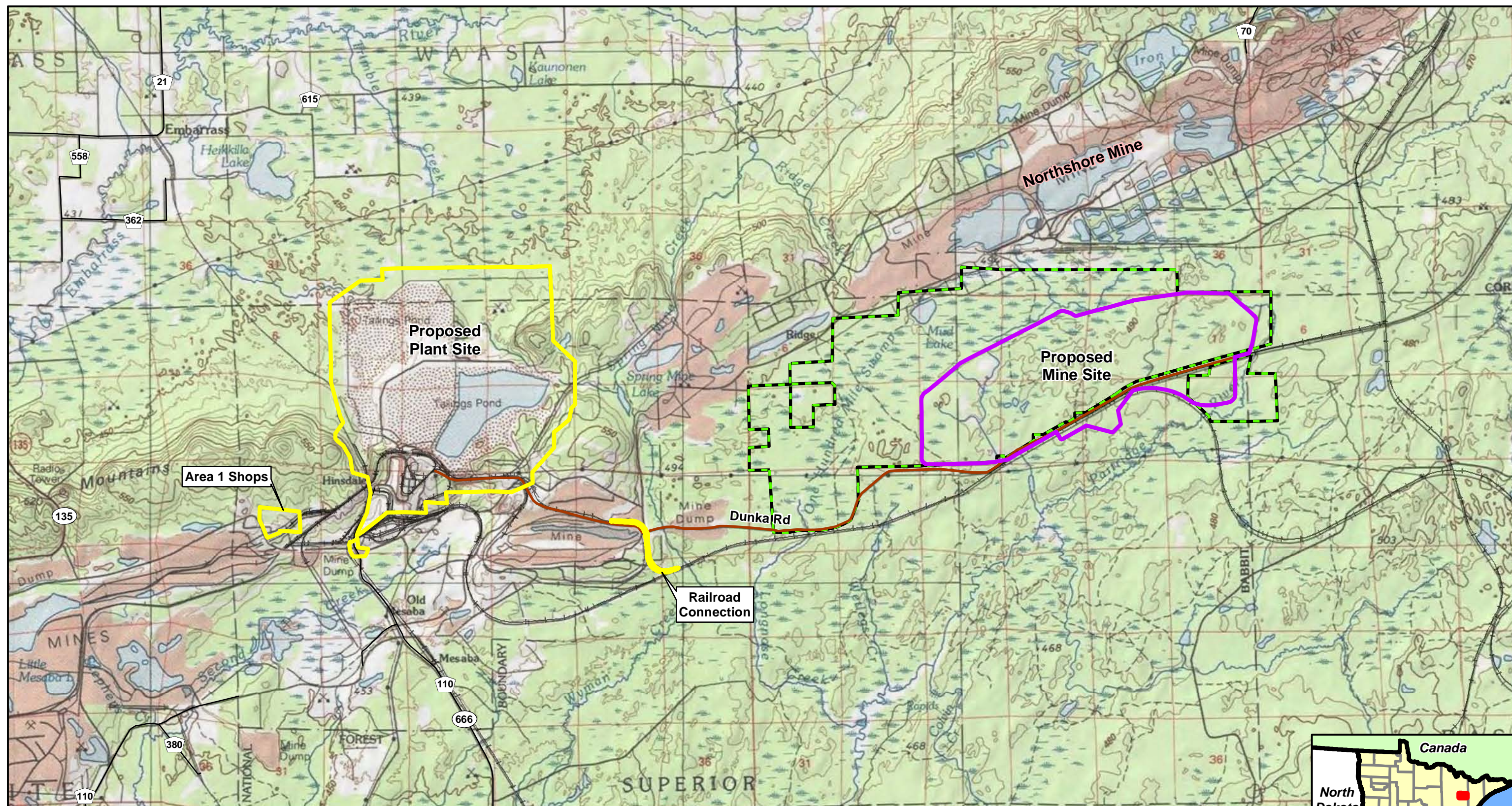
extracting minerals by means that are consistent with existing restrictions that preclude open-pit mining. This is the comparison the land exchange statute demands. It is an inescapable conclusion that continued growth in innovation and technological advances, even at paces much slower than seen recently, will lead to technologies that allow for the extraction of the mineral resources under the federal land without the need for an open pit mine. Whether such technologies exist today or whether mineral resources should be conserved for later generations are issues that have not yet been evaluated and are fundamental to the Secretary's determination of whether "the public interest will be well served by making the exchange." MCEA expects to see such analysis in the SEIS." (315-5)

## 5.0 SUMMARY AND PATH FORWARD

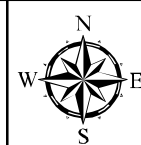
Further information on all tracts will be provided for the impact analysis. The impact analysis of the land exchange proposed action and alternatives will be addressed in the SDEIS. Alternatives which were developed during this scoping period will be included in impact analysis and the results will be evaluated. The SDEIS is anticipated for release to the public in the Fall 2011 with a comment period and public meetings to follow. Further comments on both the land exchange and mining project SDEIS may be submitted at that time. Following analysis of public comments on the SDEIS, a Final Environmental Impact Statement (FEIS) will be released in 2012.

## FIGURES





- Proposed Plant Site Boundary
- Proposed Mine Site Boundary
- Approximate Land Exchange Boundary
- Existing Dunka Road
- +++ Existing Railroad



0 0.5 1 2  
Miles

**Figure 1**  
**NorthMet Project Overview Map**  
St. Louis County, Minnesota



May, 2011



## **Appendix A**

### **Scoping Packet, Maps, and Blank Comment Form**



United States  
Department of  
Agriculture

Forest  
Service

Superior  
National  
Forest

8901 Grand Ave. Place  
Duluth, MN 55808-1122  
Phone: (218) 626-4300  
Fax: (218) 626-4398

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File Code: 5450-2

Date: October 12, 2010

Dear Interested Party:

Enclosed are maps and a summary of a proposed land exchange between the USDA Forest Service and PolyMet Mining, Incorporated (PolyMet). This exchange is being analyzed in an upcoming Supplemental Draft Environmental Impact Statement (SDEIS) as part of the NorthMet Project proposed by PolyMet. The NorthMet Project includes a proposal to construct and operate an open pit copper/nickel/cobalt/precious metals mine, an ore processing plant, and tailings basin, near Babbitt and Hoyt Lakes in St. Louis County, Minnesota.

The proposed NorthMet mine site would affect national forest lands under which PolyMet leases private sub-surface mineral rights. The Superior National Forest (SNF) is joining the Minnesota Department of Natural Resources (MnDNR) and US Army Corps of Engineers (USACE) as a joint-lead agency to complete the required environmental analysis for the NorthMet project.

Most of the lands involved in the NorthMet project were acquired by the United States under the authority of the Weeks Act, which, unlike the 1872 Mining Law in the western US, restricts the Forest Service from allowing surface mining as proposed by PolyMet. Additional national forest acreage adjacent to the project site is proposed for inclusion in the land exchange as a means to avoid intermingled and inefficient ownership patterns and eliminate conflicts if minerals development were to expand in the future. Many of these federal lands are adjacent to lands extensively impacted by past and ongoing mining activities.

The non-federal lands offered for consideration by PolyMet are located throughout the SNF and would compliment existing federal ownership by eliminating or reducing private inholdings. The non-federal tracts consist of forest and wetland habitat as well as some lake frontage, and would potentially enhance public recreation opportunities. The enclosed scoping information includes maps of federal and non-federal lands proposed for the exchange. Public open houses are planned for October 26 – 27, 2010 to provide additional opportunities for interested parties to learn about the proposed land exchange and how it will be included in the SDEIS for the NorthMet project. The agencies will use scoping comments regarding the proposed land exchange to identify additional issues to be addressed in the SDEIS.

The SDEIS will contain a full analysis of the proposed land exchange between PolyMet and the SNF and allow the lead agencies to build upon the Draft EIS that was completed in October 2009. It will provide a revised project design, a revised description of alternatives and mitigation,



and information from comments on the Draft EIS. The SDEIS is expected in the summer of 2011, with the Final EIS anticipated six to nine months later. The SDEIS will be the sole environmental document prepared by MnDNR, USACE, and SNF, and will fulfill both National Environmental Policy Act (NEPA) and Minnesota Environmental Policy Act (MEPA) requirements.

### **Commenting on the Proposed Land Exchange**

The public scoping period will extend 45 days from the Federal Register publication date of the Notice of Intent to prepare a SDEIS for the proposed NorthMet project and land. Two public open houses will be held to solicit public comments on the proposed land exchange. The dates and locations of the open houses are:

**Tuesday, October 26, 2010**  
**5:00 to 8:00 PM**

**Mesabi East High School**  
Commons Area  
601 North First Street West  
Aurora, MN 55705  
218-229-3321  
Directions:  
[www.mesabieast.k12.mn.us/](http://www.mesabieast.k12.mn.us/)

**Wednesday, October 27, 2010**  
**5:00 to 8:00 PM**

**New Brighton Family Services Center**  
Conference Room A  
400 10th St. NW  
New Brighton, MN 55112  
651-638-2130  
Directions: [www.ci.new-brighton.mn.us/](http://www.ci.new-brighton.mn.us/)  
(see Facility Rentals-Directions and map)

Scoping comments will be used to determine significant issues associated with the proposed land exchange, develop alternatives to the proposed action, determine the scope of analysis, and refine the analysis of effects. Scoping comments are most useful if they refer to an activity or mitigation rather than stated values. For example, comments such as "This drainage is used by many people for gathering berries," can help us design a better analysis than a comment like, "I don't think you should exchange any land."


If you have questions about the project or the open houses, you may contact Mark Hummel at 218-626-4303.

### **How to Submit Comments**

- All comments received (including names and addresses) will become part of the official project record and will be available for public inspection, if requested.
- **If you wish to remain on the mailing list for the NorthMet project, you must either submit comments or let us know you want to remain on the mailing list.** Be sure to include your name, organization (if any), mailing address, and email address. If you do not respond, your name will be removed from the project mailing list.
- Submit comments by writing, emailing, or faxing. Use the attached **comment form** or include the title of the project (NorthMet Mining Project and Land Exchange) in your correspondence. (We also invite you to attend one of the public open houses sessions for more information, and feel free to leave your written comments with us at that time.)

- Send **written** comments to: James W. Sanders, Forest Supervisor, Superior National Forest, 8901 Grand Avenue Place, Duluth, MN 55808.
- Electronic comments must be submitted in a format such as an email message, plain text (.txt), or MS Word (.doc), or any software supported by Microsoft applications. Send electronic comments to: [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us)
- Send **FAX** comments to: (218) 626-4396.

Sincerely,

  
Fol JAMES W. SANDERS  
Forest Supervisor

Enclosures

# Proposed NorthMet Mining Project and Land Exchange

## Introduction

This scoping information describes a proposed land exchange between the United States of America, acting through the USDA Forest Service - Superior National Forest and PolyMet Mining, Inc. (PolyMet). PolyMet has proposed the NorthMet Mine and Ore Processing Facilities Project (“NorthMet Project”) which would result in construction and operation of an open pit copper/nickel/cobalt/precious metals mine, an ore processing plant, and tailings basin 6 miles south of Babbitt in St. Louis County, Minnesota. As proposed, the NorthMet project would involve approximately 2,840 acres currently in federal ownership which are managed by the US Forest Service as part of the Superior National Forest. The mining and processing portion of the NorthMet Project is described in detail in the Draft EIS developed by the Minnesota Department of Natural Resources (MnDNR) and US Army Corps of Engineers (USACE) and released to the public in November 2009.

The proposed land exchange is considered a “connected action” to the NorthMet project; meaning that it is part of the overall project proposal and therefore will be included in the analysis of environmental impacts. The purpose and need for the land exchange is to eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate, in which PolyMet holds an interest. In addition to national forest lands encompassed in the proposed NorthMet mine site, the Forest Service proposes to include an additional 3,810 acres of federal property in the land exchange as a means to avoid intermingled and inefficient ownership patterns and eliminate conflicts if minerals development were to expand in the future. Many of these federal lands are adjacent to lands extensively impacted by past and ongoing mining activities. The enclosed vicinity map indicates the relative location of land proposed for the exchange (see enclosed map).



The non-federal lands offered for consideration by PolyMet are located throughout the Superior National Forest and would compliment existing federal ownership by eliminating or reducing private inholdings. The non-federal tracts consist of forest and wetland habitat as well as some lake frontage, and would potentially enhance public recreation opportunities.

This exchange is proposed under the authorities of the Weeks Act of March 1, 1911 as amended; the Federal Land Policy and Management Act of October 21, 1976; and the Federal Land Exchange Facilitation Act of 1988.

The proposal meets four Forest Service Strategic Plan Goals: 1) provide and sustain benefits to the American people (desired outcome is forests with sufficient long-term multiple socioeconomic benefits to meet the needs of society); 2) conserve open space; 3) sustain and enhance outdoor recreation opportunities; and 4) maintain basic management capabilities of the Forest Service by reducing landlines and mineral conflicts.

An in-depth analysis of this proposed exchange will be disclosed in the Supplemental Draft Environmental Impact Statement (SDEIS) as a connected action to the NorthMet Project.

## **Proposed Action: Description of Lands Proposed for Exchange**

### ***Current federal lands***

The federal land consists of a single contiguous tract of mostly forested land, about 6,650 acres in size, located in the west/central part of the Superior National Forest on the Laurentian Ranger District in the historic Iron Range of Northeastern Minnesota (see enclosed map). The tract lies immediately south of the Superior National Forest proclamation boundary and is bounded on the south by the former LTV Steel Mining Company (LTVSMC) railroad grade and the Dunka Road. The Dunka Road is a private road with sections owned and leased by Cliffs Erie, PolyMet, and Minnesota Power. Access is primarily via the Dunka Road and the LTVSMC railroad grade. The federal land encompasses many acres of the 100-mile Swamp, a large black spruce, tamarack and cedar wetland. Yelp Creek and the Partridge River flow through the tract. Mud Lake is also located on the federal land.

### ***Non-federal lands***

The non-federal lands include five different tracts of land that total approximately 6,722 acres and include predominately forest and wetland habitat (see enclosed maps). All tracts were assembled by PolyMet for the purpose of this proposed exchange.

#### **Tract 1**

The largest non-federal tract, identified as Tract 1 (“Hay Lake tract”), consists of approximately 4,650 acres and is located on the southeastern portion of the Laurentian Ranger District, west of and adjoining County Road 715 and north of the town of Biwabik in St. Louis County. The Hay Lake tract includes Hay Lake, identified as a Wild Rice Water by the MnDNR, and Little Rice Lake, which is used by trumpeter swans, a State Threatened species.



Aerial photo of Hay Lake Tract featuring important water features and habitat for many native species of plants and animals.



Approximately 8 miles of the upper Pike River flow through Tract 1.

#### Tract 2

Tract 2 (“Lake County lands”) consists of approximately 320 acres of land formerly owned by Lake County. The tract includes various 40-acre parcels on the Laurentian Ranger District southeast of Seven Beaver Lake that are mostly surrounded by National Forest lands and offer a high percentage of wetland habitat.

#### Tract 3

Tract 3 (“Wolf lands”) consists of approximately 1,560 acres of land on the Laurentian and Tofte Ranger Districts, west and southwest of Isabella, MN. The tract includes four separate parcels that compliment National Forest ownership by reducing federal exterior boundaries and eliminating several private in holdings. Like Tract 2, this tract includes a high percentage of wetland habitat.

#### Tract 4

Tract 4 (“Hunting Club lands”) consists of approximately 160 acres on the LaCroix Ranger District, 5 miles southwest of Crane Lake. Two small unnamed lakes are partially included in the tract, as well as a high percentage of wetland habitat. Tract 4 is surrounded by National Forest, St. Louis County lands, and private ownership.

#### Tract 5

Tract 5 (“McFarland Lake”) consists of approximately 32 acres on the Gunflint Ranger District in northeastern Cook County. This tract consolidates National Forest ownership and includes lakefront property on McFarland Lake, an entry point to the Boundary Waters Canoe Area Wilderness. Access to the property is available by water from a landing off County Road 16 (Arrowhead Trail) approximately 10 miles north of Hovland, MN.

### **Surrounding Land Use**

Non-federal properties to the north and west of the federal land have been extensively impacted over the years by open-pit mines, mine waste rock stockpiles, tailings basins, mine processing facilities, railroad grades, and general mining activities.

### **Responsible Official and Nature of Decision To Be Made**

The Responsible Official for the proposed land exchange is the Forest Supervisor for the Superior National Forest. The Responsible Official will decide in a Record of Decision whether to proceed with the proposed land exchange.

C A N A D A

Vicinity Map  
PolyMet Mining, Inc.  
Land Exchange



Tract 4

BWCA Wilderness

BWCA Wilderness

Tract 5

Grand Marais

Tract 1

Federal Lands

Tract 3

Tract 3

Tract 3

Tofte

Lake

Superior

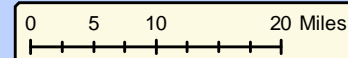
Aurora

Tract 2

Tract 2

Tract 3

Vicinity Map



The Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those for which they were created, may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. The Forest Service will not be liable for any activity involving this information. For more information, contact: Superior National Forest, GIS Coordinator, 8901 Grand Avenue Place, Duluth, MN 55808.

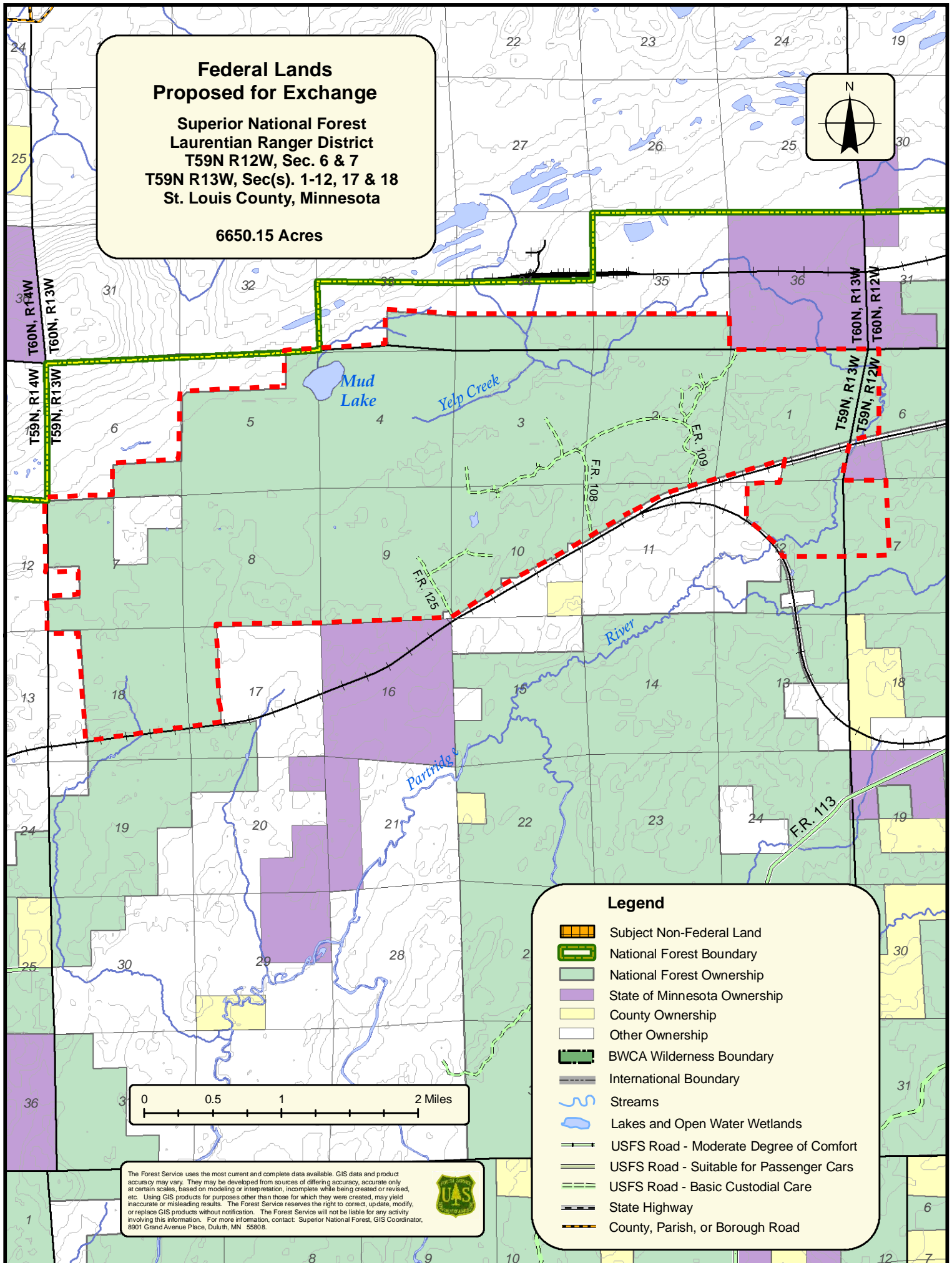
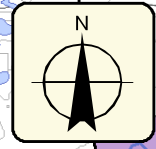




## Federal Lands Proposed for Exchange

Superior National Forest  
Laurentian Ranger District  
T59N R12W, Sec. 6 & 7  
T59N R13W, Sec(s). 1-12, 17 & 18  
St. Louis County, Minnesota

6650.15 Acres



### Legend

- Subject Non-Federal Land
- National Forest Boundary
- National Forest Ownership
- State of Minnesota Ownership
- County Ownership
- Other Ownership
- BWCA Wilderness Boundary
- International Boundary
- Streams
- Lakes and Open Water Wetlands
- USFS Road - Moderate Degree of Comfort
- USFS Road - Suitable for Passenger Cars
- USFS Road - Basic Custodial Care
- State Highway
- County, Parish, or Borough Road

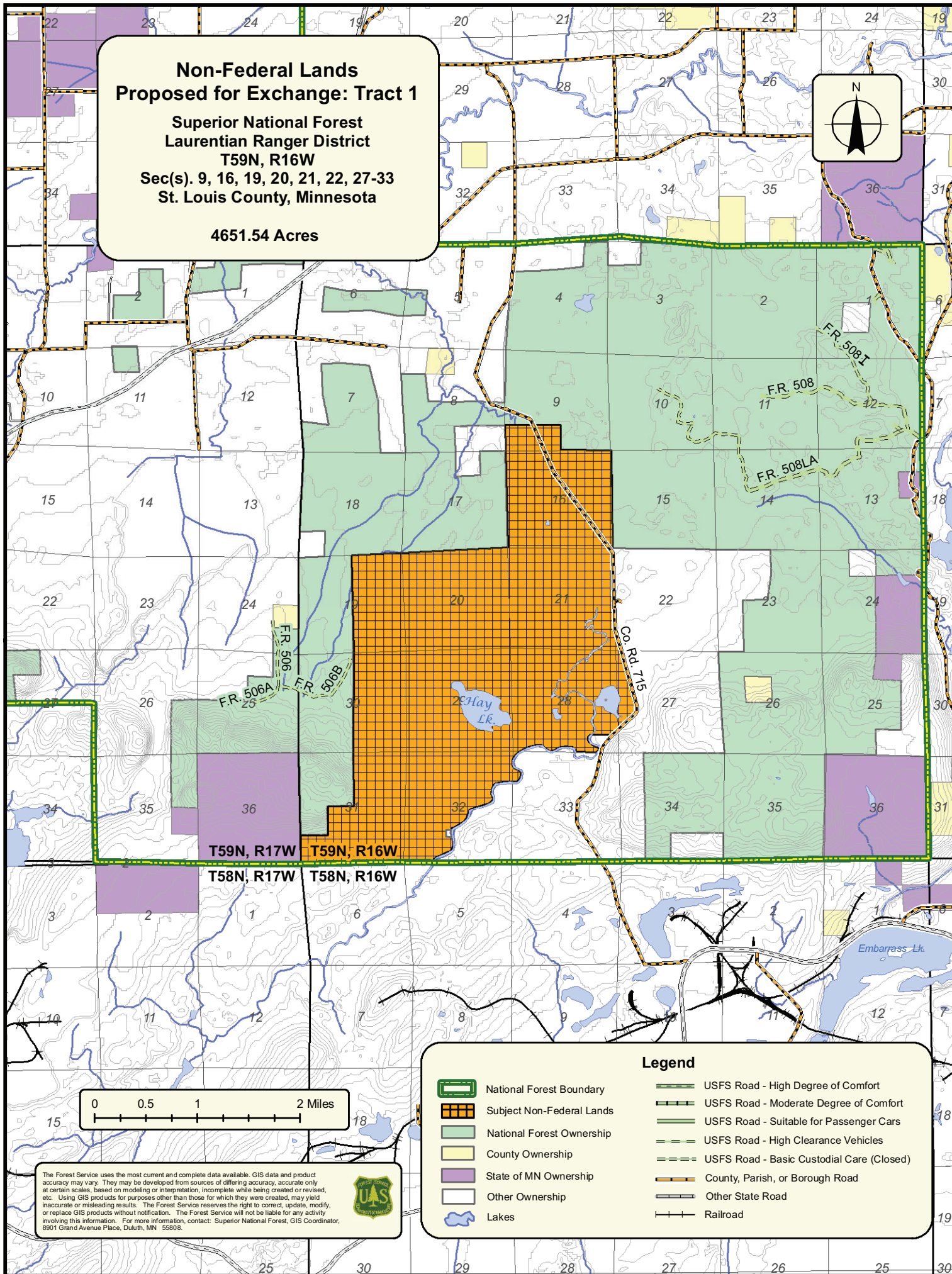
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# Non-Federal Lands Proposed for Exchange: Tract 1

Superior National Forest  
Laurentian Ranger District  
T59N, R16W  
Sec(s). 9, 16, 19, 20, 21, 22, 27-33  
St. Louis County, Minnesota

4651.54 Acres



T59N, R17W T59N, R16W  
T58N, R17W T58N, R16W

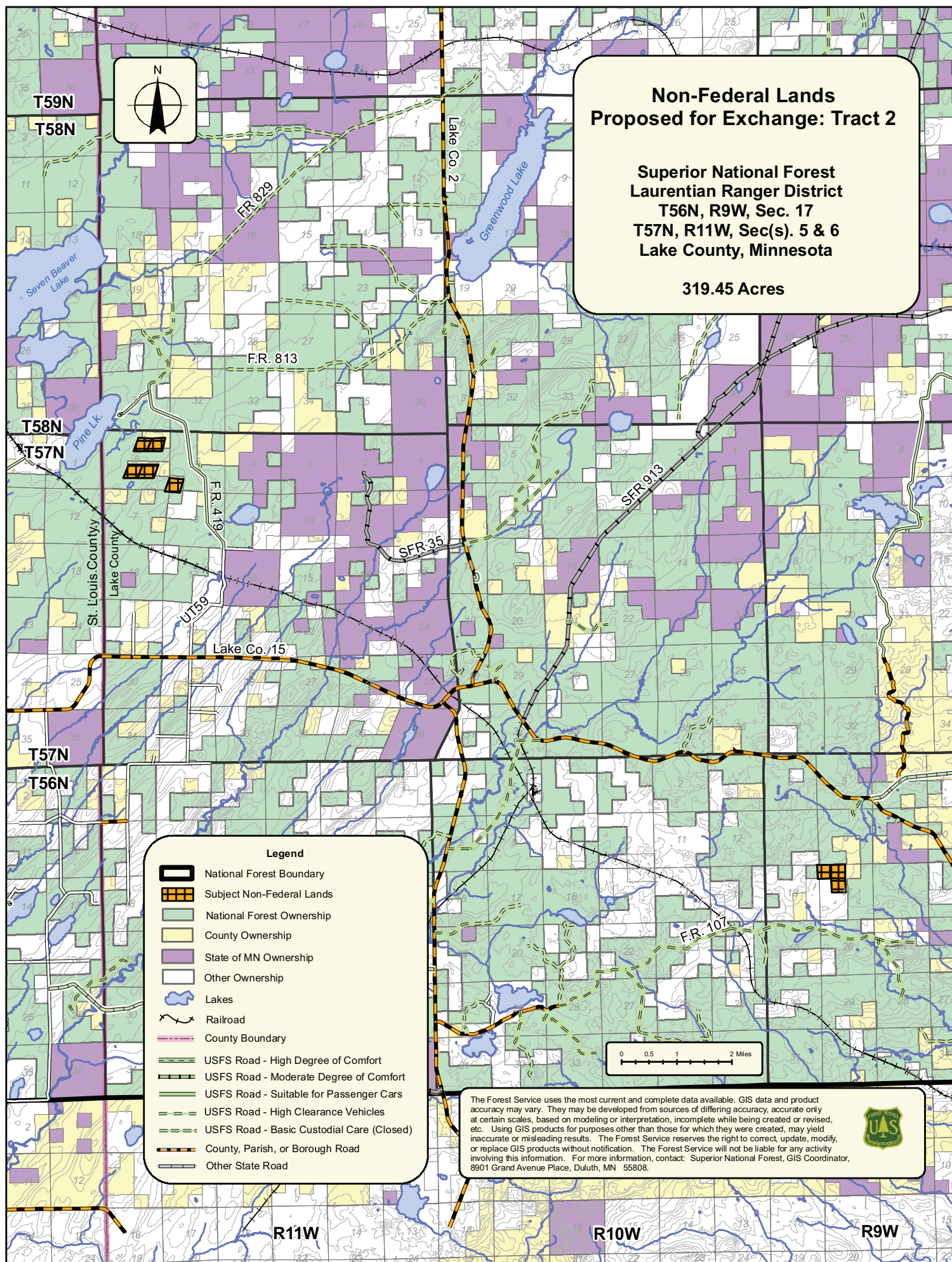
## Legend

- |  |                           |  |   |
|--|---------------------------|--|---|
|  | National Forest Boundary  |  | USFS Road - High Degree of Comfort        |
|  | Subject Non-Federal Lands |  | USFS Road - Moderate Degree of Comfort    |
|  | National Forest Ownership |  | USFS Road - Suitable for Passenger Cars   |
|  | County Ownership          |  | USFS Road - High Clearance Vehicles       |
|  | State of MN Ownership     |  | USFS Road - Basic Custodial Care (Closed) |
|  | Other Ownership           |  | County, Parish, or Borough Road           |
|  | Lakes                     |  | Other State Road                          |
|  |                           |  | Railroad                                  |

The Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those for which they were created, may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. The Forest Service will not be liable for any activity involving this information. For more information, contact: Superior National Forest, GIS Coordinator, 8901 Grand Avenue Place, Duluth, MN 55808.





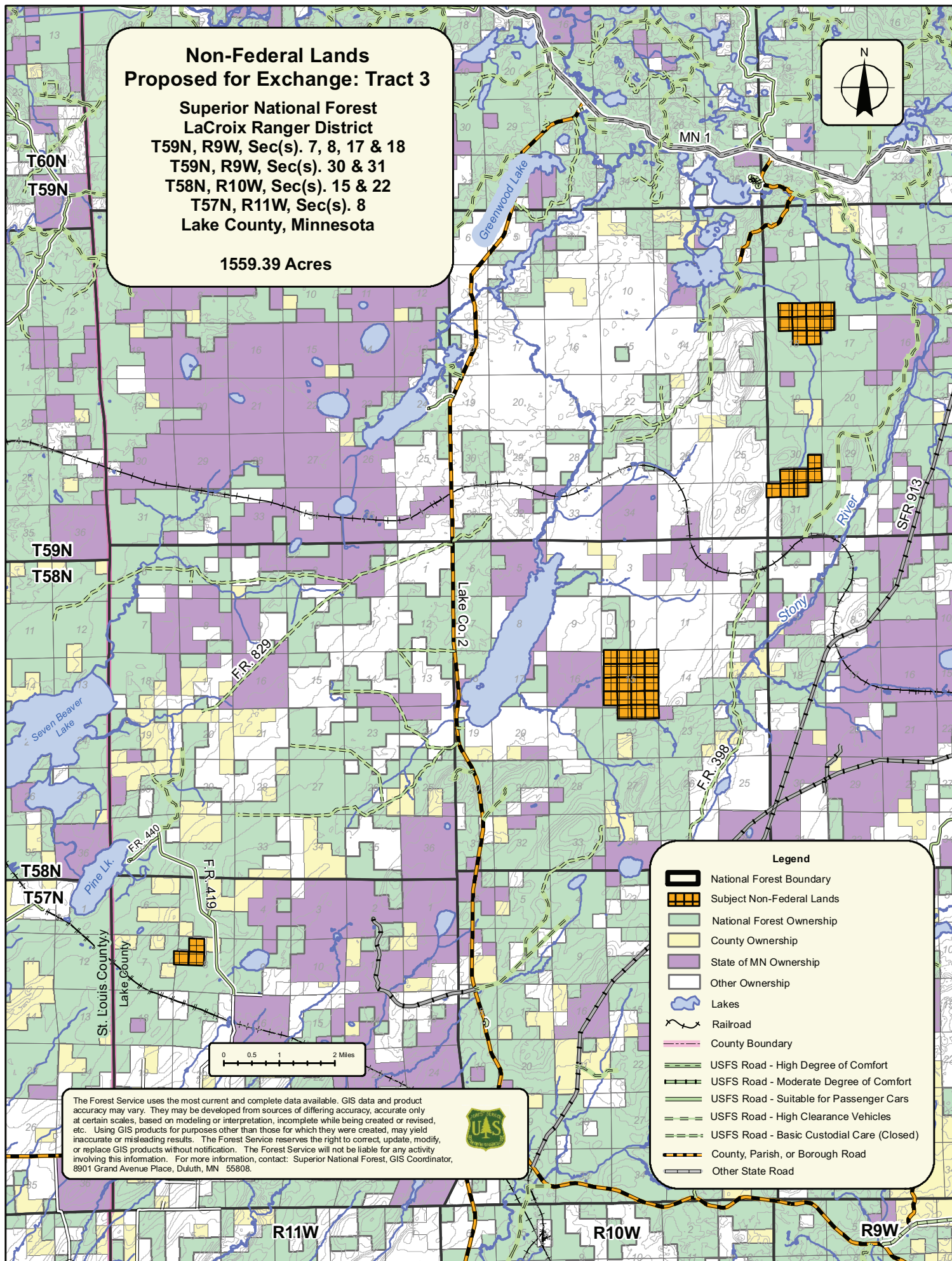




# **Non-Federal Lands Proposed for Exchange: Tract 3**

**Superior National Forest  
LaCroix Ranger District  
T59N, R9W, Sec(s). 7, 8, 17 & 18  
T59N, R9W, Sec(s). 30 & 31  
T58N, R10W, Sec(s). 15 & 22  
T57N, R11W, Sec(s). 8  
Lake County, Minnesota**

**1559.39 Acres**



The Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those for which they were created, may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. The Forest Service will not be liable for any activity involving this information. For more information, contact: Superior National Forest, GIS Coordinator, 8901 Grand Avenue Place, Duluth, MN 55808.



- Legend**
- National Forest Boundary
  - Subject Non-Federal Lands
  - National Forest Ownership
  - County Ownership
  - State of MN Ownership
  - Other Ownership
  - Lakes
  - Railroad
  - County Boundary
  - USFS Road - High Degree of Comfort
  - USFS Road - Moderate Degree of Comfort
  - USFS Road - Suitable for Passenger Cars
  - USFS Road - High Clearance Vehicles
  - USFS Road - Basic Custodial Care (Closed)
  - County, Parish, or Borough Road
  - Other State Road

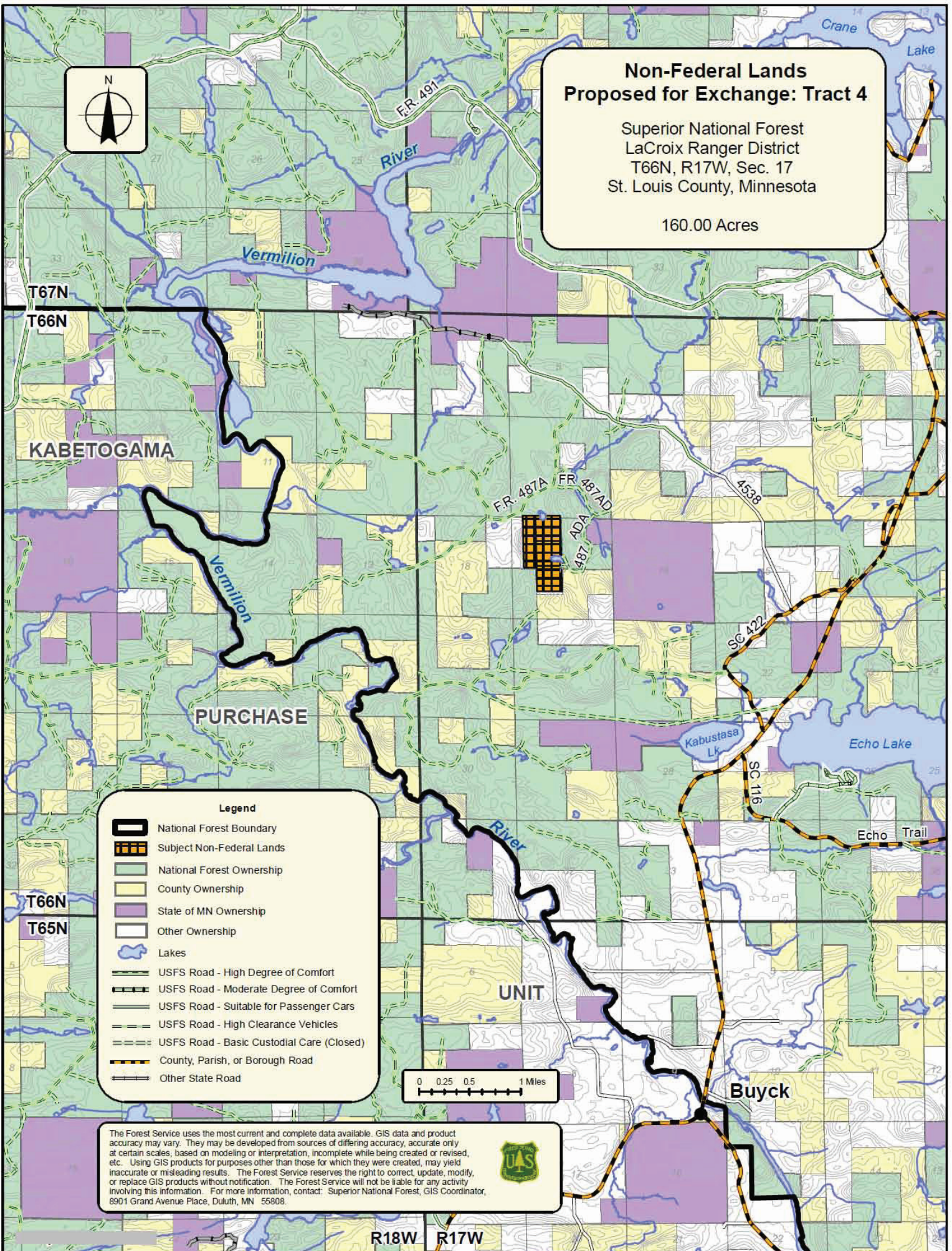




## Non-Federal Lands Proposed for Exchange: Tract 4

Superior National Forest  
LaCroix Ranger District  
T66N, R17W, Sec. 17  
St. Louis County, Minnesota

160.00 Acres

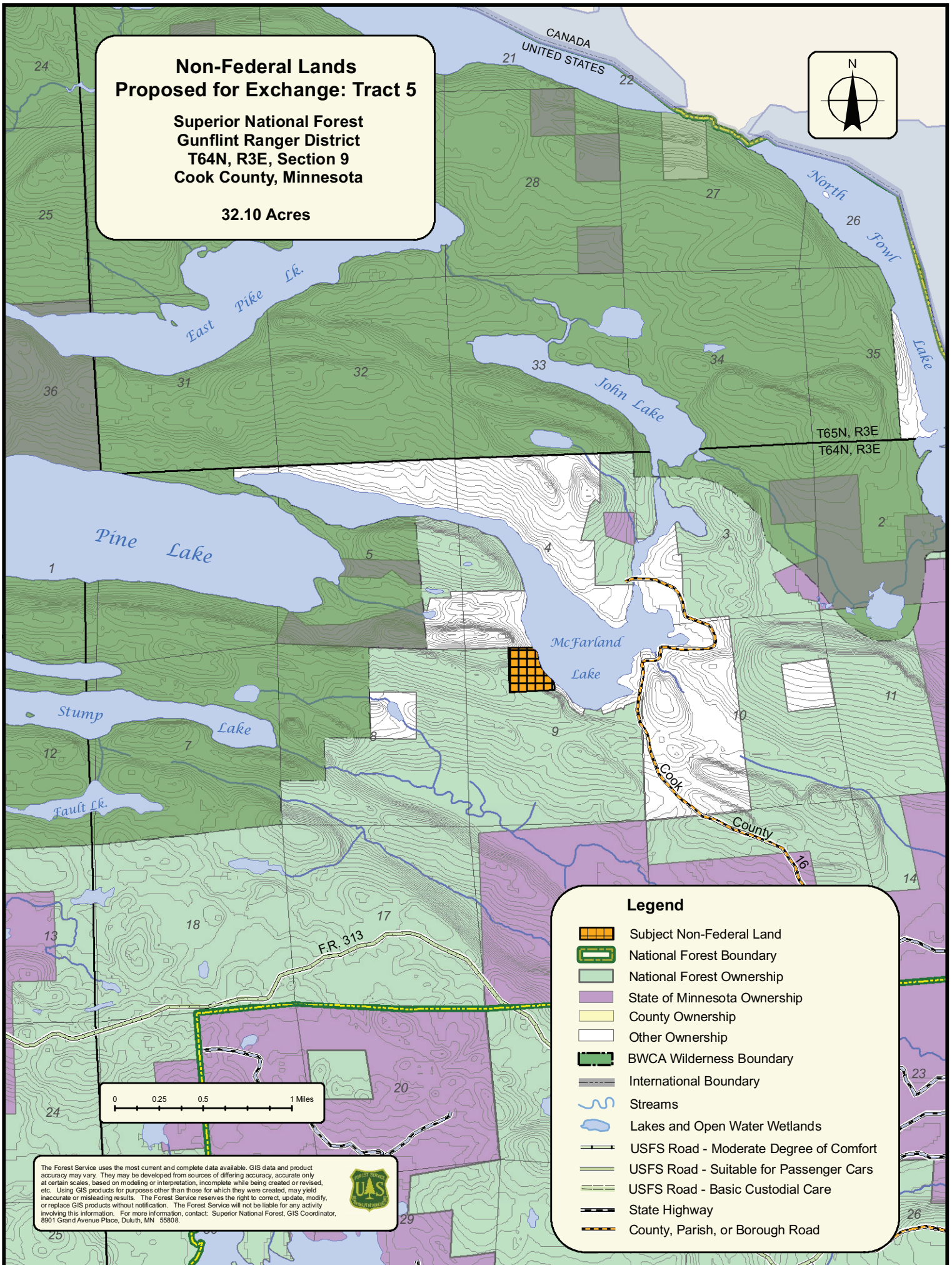
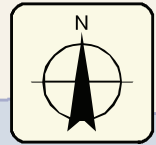




# Non-Federal Lands Proposed for Exchange: Tract 5

Superior National Forest  
Gunflint Ranger District  
T64N, R3E, Section 9  
Cook County, Minnesota

32.10 Acres



## Legend

- Subject Non-Federal Land
- National Forest Boundary
- National Forest Ownership
- State of Minnesota Ownership
- County Ownership
- Other Ownership
- BWCA Wilderness Boundary
- International Boundary
- Streams
- Lakes and Open Water Wetlands
- USFS Road - Moderate Degree of Comfort
- USFS Road - Suitable for Passenger Cars
- USFS Road - Basic Custodial Care
- State Highway
- County, Parish, or Borough Road

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## Proposed NorthMet Mining Project and Land Exchange

The US Forest Service, US Army Corps of Engineers, and Minnesota Department of Natural Resources invite your comments on the NorthMet Mining Project and Land Exchange proposal. Please provide comments in the space below. If you require more space, please attach additional sheets as needed. To be most useful, comments should discuss specific issues. All comments will be considered in the development of the Supplemental Draft Environmental Impact Statement.

Name	_____	Organization	_____
Address	_____	Phone	_____
	_____	E-mail	_____

Comments:

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

Written comments may also be submitted electronically to: [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us) or by fax to (218) 626-4396.

Fold along dashed line, staple, and add postage to mail.

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Place  
Postage  
Here

JAMES W. SANDERS, FOREST SUPERVISOR  
SUPERIOR NATIONAL FOREST  
8901 GRAND AVENUE PLACE  
DULUTH MN 55808

## **Appendix B**

### **Federal Register Notice of Intent**

environmental impact statement is expected June, 2012.

**ADDRESSES:** Send written comments to Mt. Hood National Forest, 16400 Champion Way, Sandy, OR 97055. Comments may also be sent via e-mail to [comments-pacificnorthwest-mthood@fs.fed.us](mailto:comments-pacificnorthwest-mthood@fs.fed.us), or via facsimile to (503) 668-1413.

**FOR FURTHER INFORMATION CONTACT:** Kristy Boscheinen, Forest Planner, Mt. Hood National Forest, at (503) 668-1645 or by e-mail at [kboscheinen@fs.fed.us](mailto:kboscheinen@fs.fed.us).

Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern Time, Monday through Friday.

#### **SUPPLEMENTARY INFORMATION:**

##### **Purpose and Need for Action**

The purpose of the proposed land exchange between the Mt. Hood National Forest and Mt. Hood Meadows Oreg., LLC is to comply with the Omnibus Public Land Management Act of March 30, 2009 (123 Stat. 991, Pub. L. 111-11), which provides direction for this land exchange.

##### **Proposed Action**

The proposed action includes the conveyance of approximately two parcels totaling 120 acres of National Forest System (NFS) land adjacent to Government Camp in exchange for the acquisition of approximately 770 acres of land owned by Mt. Hood Meadows Oreg., LLC, in Hood River County, Oregon.

The Omnibus legislation states that a conservation easement shall be placed on a portion of the Government Camp parcels in order to protect an existing wetland, and that the easement shall allow "equivalent mitigation measures to compensate for minor wetland encroachments necessary for the orderly development of the Federal land." (Pub. L. 111-11, 129 Stat. 1019) The legislation also states that a trail easement be used at the Government Camp parcels to allow nonmotorized public access to existing trails, to allow roads, utilities, and infrastructure facilities to cross the trails, and to allow for the improvement or relocation of the trails to accommodate development of the federal land.

The Omnibus legislation also directed that the majority of the acquired lands be placed into a new management unit called the "Crystal Springs Watershed Special Resources Management Unit.

##### **Responsible Official**

The Responsible Official is the Regional Forester, USDA Forest Service Pacific Northwest Region.

##### **Preliminary Issues**

A preliminary analysis of potential effects to resource areas including wildlife, fisheries, water quality, wetlands and floodplains, and cultural/historic sites revealed the following preliminary issues:

(1) Camp Creek and an intermittent tributary of Camp Creek run through the Federal parcels. Neither reach of the stream is fish bearing. Camp Creek is not 303(d)-listed, but it does have water quality problems associated with Government Camp (such as sewage and runoff from the roads). Depending on the type and quality of development that might occur on the parcels after the exchange, the water quality could further decrease. However, the impacts of development should be lessened by the Congressionally-mandated conservation easement on the wetland, through which the streams flow. Detailed information is not available regarding fisheries or water quality on the non-Federal parcel.

Surveys for wetlands and floodplains on both parcels have been completed and are being reviewed. Wetlands are present on the Federal parcels, and narrow, stream-associated wetlands exist on the non-Federal parcel. It appears that the Forest Service will be conveying more wetlands than would be acquired.

Executive Order 11990 requires no net loss of wetlands. The Forest Hydrologist will be involved to consider possible mitigation measures.

In the Omnibus bill (a)(G)(i), Congress mandated that a conservation easement, as identified by the Oregon Department of State Lands, would be placed upon the wetlands at Government Camp. The easement would protect the wetland and allow for equivalent wetland mitigation measures necessary for the orderly development of the conveyed land. The acquisition of the wetlands at Cooper Spur and the easement on the wetlands at Government Camp may result in no net loss of wetlands.

Cultural and Heritage resource surveys were conducted on the Federal parcel. The survey revealed the potential for an adverse effect to a site of archaeological/cultural interest. Mitigation measures will be developed with Tribal and State Historic Preservation Officer (SHPO) consultation.

Trails 755, 755A, and 755B cross the Federal parcels. A trail easement has

been congressionally mandated, so that non-motorized users would continue to be able to use the trails to get to Federal land, so that roads, utilities, and infrastructure facilities could be built across the trails, and to allow for improvement or relocation of the trails so that development of the conveyed parcels could occur. While the trails (or relocated trails) would still exist, the recreation experience could be negatively impacted by new development (such as buildings and parking lots) or the presence of new infrastructure.

##### **Scoping Process**

This notice of intent initiates the scoping process, which guides the development of the environmental impact statement. A public scoping meeting will be held in or near Portland, Oregon, on October 26th, 2010, from 5 to 7 p.m. The location is to be determined. When the location is determined, the public will be notified via the Mt. Hood National Forest's Web site and a news release.

It is important that reviewers provide their comments at such times and in such manner that they are useful to the agency's preparation of the environmental impact statement. Therefore, comments should be provided prior to the close of the comment period and should clearly articulate the reviewer's concerns and contentions.

Comments received in response to this solicitation, including names and addresses of those who comment, will be part of the public record for this proposed action. Comments submitted anonymously will be accepted and considered, however.

Dated: October 6, 2010.

**Kathryn J. Silverman,**  
*Acting Forest Supervisor.*

[FR Doc. 2010-25698 Filed 10-12-10; 8:45 am]

**BILLING CODE 3410-11-P**

## **DEPARTMENT OF DEFENSE**

### **Department of the Army; Corps of Engineers**

## **DEPARTMENT OF AGRICULTURE**

### **Forest Service**

#### **Superior National Forest, Minnesota**

Intent to prepare a supplemental draft environmental impact statement for the construction and operation of an open pit copper/nickel/cobalt/precious metals mine, an ore processing plant, and tailings basin proposed by PolyMet

Mining, Inc., near Babbitt and Hoyt Lakes in St. Louis County, Minnesota. The supplement will add an analysis of a land exchange between the proponent and the US Forest Service, Superior National Forest.

**AGENCIES:** Department of the Army, US Army Corps of Engineers, Department of Defense; Forest Service, USDA.

**ACTION:** Notice of intent (NOI) to prepare a supplemental draft environmental impact statement (SDEIS). (The original NOI to prepare a draft EIS for the proposed Polymet Mining, Inc. Northmet project was published by the US Army Corps of Engineers in Volume 70, Number 126 of the **Federal Register**, pages 38,122–38,123, July 1, 2005.)

**SUMMARY:** The SDEIS will supplement and supersede the Draft EIS of October 27, 2009 (DEIS), which was produced jointly by the US Army Corps of Engineers (USACE) and the Minnesota Department of Natural Resources (MNDNR), released for public comment on November 6, 2009. The SDEIS will respond to concerns about wetlands and water quality issues associated with the NorthMet mining and ore processing proposal, located in Northeast Minnesota, as identified by the US Environmental Protection Agency and other commentors. The SDEIS will also incorporate potential effects from a proposed land exchange between the USDA Superior National Forest (SNF) and PolyMet Mining, Inc. (PolyMet). The SNF will join the USACE and MNDNR as a third lead agency responsible for EIS preparation because the land where the mine is proposed is owned by the SNF.

Cooperating Agencies for preparation of the SDEIS include Minnesota Bands of Chippewa/Ojibwe (Bois Forte and Fond du Lac). Others who have requested to become cooperating agencies include the United States Environmental Protection Agency (USEPA) and the Grand Portage Band of Chippewa/Ojibwe. Federal laws and policies, which the joint lead agencies are required to consider, will be outlined in the EIS for both mine permitting and land exchange processes.

**DATES:** The SNF is currently developing scoping materials for the land exchange portion of this project. This scoping package will be sent to interested parties for a 45-day comment period, anticipated to occur in October and November of 2010. The USACE and the SNF will use these scoping comments to identify significant issues that will guide the analysis of impacts associated with the land exchange. The scoping package will also be available for review, along with supplemental large

scale maps, on the internet at the following Web site: [www.fs.usda.gov/goto/superior/projects](http://www.fs.usda.gov/goto/superior/projects).

The Supplemental DEIS is expected in the summer of 2011, with the final environmental impact statement anticipated six-to-nine months later.

**ADDRESSES:** *Mining and Ore Processing Proposal:* No additional scoping requested.

*Land Exchange:* Send written comments regarding the land exchange to James W. Sanders, Forest Supervisor, 8901 Grand Avenue Place, Duluth, MN 55808. Written comments may also be submitted electronically to: [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us), or by fax to (218) 626–4398.

**FOR FURTHER INFORMATION CONTACT:** *Mining and Ore Processing Proposal:* Contact Mr. Jon K. Ahlness for issues associated with the mining proposal, Section 404 Wetlands issues, and Clean Water Act questions; by letter at U.S. Army Corps of Engineers, 180 Fifth Street East, Suite 700, St. Paul, MN 55101–1678, by telephone at 651–290–5381, or by e-mail at [jon.k.ahlness@usace.army.mil](mailto:jon.k.ahlness@usace.army.mil).

*Land Exchange:* Contact Mark Hummel, SNF Deputy Forest Supervisor, for additional information or questions about the proposed land exchange, by letter at 8901 Grand Avenue Place, Duluth, MN 55808, by e-mail at [mhummel@fs.fed.us](mailto:mhummel@fs.fed.us), or by phone at 218–626–4303.

#### **SUPPLEMENTARY INFORMATION:**

#### **Mining and Processing Proposal**

##### **Purpose and Need for Action**

The purpose and need of the NorthMet mining and ore processing project is to produce base and precious metals, precipitates, and flotation concentrates from ore mined at the NorthMet deposit by uninterrupted operation of the former LTVSMC processing plant site. The processed resources would help meet domestic and global demand by sale of these products to domestic and world markets.

##### **Proposed Action**

PolyMet has applied to the St. Paul District of the USACE for a permit to discharge fill material into waters of the United States, including jurisdictional wetlands, to facilitate the construction and operation of an open pit copper/nickel/cobalt/precious metals mine in the low grade poly-metallic disseminated magmatic sulfide NorthMet deposit in northeastern Minnesota, approximately 6 miles south of the town of Babbitt.

#### **Responsible Official and Nature of Decision To Be Made**

The responsible official for the USACE, the District Engineer for the St. Paul District, will decide in a Record of Decision, whether to issue a Clean Water Act, Section 404 permit for the discharge of fill materials into the waters of the United States, including jurisdictional wetlands.

#### **No Additional Scoping for Mining and Processing Proposal**

USACE and SNF are not requesting scoping comments on the NorthMet mining and ore processing project at this time. Comments have already been received in response to the original scoping notice of October 25, 2005, and in response to the Draft EIS of October 27, 2009. The proposed mining and ore processing action still falls within the scope of analysis identified in the October 25, 2005, Final Scoping Decision Document, produced jointly with the MNDNR. Scoping will be conducted for the land exchange.

#### **SUPPLEMENTARY INFORMATION:**

##### **Land Exchange**

##### **Purpose and Need for Action**

The purpose and need for the land exchange is to eliminate conflicts between the United States and the private mineral estate. (The SNF has concluded that the proponent does not have the right to remove the surface of public lands by operating an open pit mine unless the lands in question were exchanged into private ownership. PolyMet maintains that specific language in the mineral reservation allows open pit mining.)

Another purpose and need for the land exchange is to consolidate land ownership so as to improve management effectiveness, improve public access to federal lands and reduce boundary lines.

The proposal meets three Forest Service Strategic Plan Goals: (1) Provide and sustain benefits to the American people (desired outcome is forests with sufficient long-term multiple socioeconomic benefits to meet the needs of society); (2) conserve open space; and (3) sustain and enhance outdoor recreation opportunities.

Of the approximately 6,650 acres of land proposed for exchange to private ownership, the NorthMet mine site would encompass approximately 2,840 acres. The remaining federal property proposed for inclusion in the land exchange, approximately 3,810 acres, would improve intermingled and inefficient ownership patterns and eliminate conflicts if minerals

development were to expand in the future. Many of these federal lands are adjacent to lands extensively impacted by past and ongoing mining activities.

The nonfederal lands offered for consideration by PolyMet are located throughout the SNF and compliment existing federal ownership by eliminating or reducing private inholdings. The non-federal tracts consist of forest and wetland habitat as well as some lake frontage, potentially enhancing public recreation opportunities.

### Proposed Action

The proposed action is a land exchange between the United States of America, acting through the Forest Service, U.S. Department of Agriculture SNF and PolyMet. The land exchange would transfer approximately 6,650 acres of federal land from public to private ownership, and approximately 6,722 acres of land from private to public ownership. An in-depth analysis of this proposed exchange will be disclosed in the supplemental draft and final environmental impact statements for the NorthMet project. The NorthMet project is described in the October 27, 2009 Draft EIS developed by MNDNR and USACE.

This exchange is proposed under the authority of the Weeks Act of March 1, 1911 as amended; General Exchange Act of March 20, 1922; Federal Land Exchange Facilitation Act of 1988; and the Federal Land, Policy and Management Act of October 21, 1976.

The federal land consists of a single contiguous tract of mostly forested land, approximately 6,650 acres in size, located in the west/central part of the SNF on the Laurentian Ranger District in the historic Iron Range of Northeastern Minnesota. The tract lies immediately south of the SNF proclamation boundary and is bounded on the south by the former LTV Steel Mining Company (LTVSMC) railroad grade and the Dunka Road. The Dunka Road is a private road with sections owned and leased by Cliffs Erie, PolyMet and Minnesota Power. Access is primarily via the Dunka Road and the LTVSMC railroad grade.

Nonfederal properties to the north and west of the federal land have been extensively impacted over the years by open-pit mining, mine waste rock stockpiles, tailings basins, mine processing facilities, railroad grades, and general mining activities. The federal land encompasses many acres of the 100-mile Swamp, a large black spruce, tamarack and cedar wetland. Yelp Creek and the Partridge River flow

through the tract. Mud Lake is also located on the federal land.

The nonfederal lands include five different tracts of land that total approximately 6,722 acres and include predominately forest and wetland habitat.

The largest nonfederal tract, identified as Tract 1, consists of approximately 4,650 acres (Hay Lake tract), located on the southeastern portion of the Laurentian Ranger District, west of and adjoining County Road 715 and north of the town of Biwabik in St. Louis County. The Hay Lake tract includes Hay Lake, identified as a Wild Rice Water by the MnDNR, and Little Rice Lake, which is used by trumpeter swans, a State Threatened species. Approximately eight miles of the upper Pike River flow through Tract 1.

Tract 2 ("Lake County lands") consists of approximately 320 acres of land formerly owned by Lake County. The tract includes various 40-acre parcels on the Laurentian Ranger District southeast of Seven Beaver Lake that are mostly surrounded by National Forest lands and offer significant wetland habitat.

Tract 3 ("Wolf Lands") consists of approximately 1,560 acres of land on the Laurentian and Tofte Ranger Districts, west and southwest of Isabella, MN. The tract includes four separate parcels that block in or compliment National Forest ownership and, like Tract 2, offer significant wetland habitat.

Tract 4 ("Hunting Club" lands) consists of approximately 160 acres on the LaCroix Ranger District, 5 miles southwest of Crane Lake. Two small unnamed lakes are partially included in the tract, as well as a large percentage of wetland habitats. Tract 4 is surrounded by National Forest, St. Louis County lands, and private ownership.

Tract 5 ("McFarland Lake") consists of approximately 32 acres on the Gunflint Ranger District in northeastern Cook County. The tract blocks in National Forest ownership and includes lake-front property on McFarland Lake, an entry point to the Boundary Waters Canoe Area Wilderness. Access to the property is available by water from a landing off County Road 16 (Arrowhead Trail) approximately ten miles north of Hovland, MN. All tracts were assembled by PolyMet for the purpose of this proposed exchange.

### Responsible Official and Nature of Decision to be Made

The Responsible Official for the proposed land exchange is the Forest Supervisor for the SNF. The Responsible Official will decide in a Record of Decision whether the

proposed land exchange would result in an overall benefit to the public good.

### Scoping Process

Public scoping for the proposed SNF and PolyMet land exchange will include notices in the newspaper of record, mailing of the scoping package (detailed information of the purpose and need for the project, the proposed action, description of the project area, maps, and proposed federal and non-federal lands involved in the proposed exchange) to interested and affected publics and posting of the project on the agency's project planning web pages and notice in the Forest Service quarterly Schedule of Proposed Actions.

### Comment Requested

This notice of intent initiates the scoping process which guides the development and incorporation of the proposed land exchange into the Northmet Project environmental impact statement. Comments received, including the names and addresses of those who comment, will be considered part of the public record on this proposal and will be available for public inspection.

(Authority: 40 CFR 1501.7 and 1508.22; Forest Service Handbook 1909.15, Section 21).

Dated: September 29, 2010.

**Tamara E. Cameron,**  
Chief, Regulatory Branch, St. Paul District,  
Corps of Engineers.

Dated: October 4, 2010.

**James W. Sanders,**  
Forest Supervisor, USDA Superior National  
Forest.

[FR Doc. 2010-25755 Filed 10-12-10; 8:45 am]

**BILLING CODE 3140-11-P**

## DEPARTMENT OF AGRICULTURE

### Forest Service

#### Fresno County Resource Advisory Committee

**AGENCY:** Forest Service, USDA.

**ACTION:** Notice of meeting.

**SUMMARY:** The Fresno County Resource Advisory Committee will be meeting in Prather, California, November 17, 2010 and in Clovis, California, December 15, 2010. The purpose of the meetings will be to accept and review project proposals for the next funding cycle as well as review prior year accomplishments.

**DATES:** The meeting will be held on November 17, 2010 from 6 p.m. to 8:30 p.m. and December 15, 2010 from 6 p.m. to 8:30 p.m.



## **Appendix C**

### **Other Announcements of Scoping Process**



**PRESS RELEASE**  
**Superior National Forest**  
***FOR IMMEDIATE RELEASE***

**DATE: October 15, 2010**

**Contact: Kris Reichenbach, Superior National Forest, 218-626-4393**

**Agencies Invite Public Scoping Comments on Proposed Land Exchange with PolyMet Mining, Inc.**

The USDA Forest Service, along with the U.S. Army Corps of Engineers (USACE), and Minnesota Department of Natural Resources (MnDNR) are inviting public scoping comments on a proposed land exchange between the Forest Service and PolyMet Mining, Incorporated (PolyMet) that is being considered as part of the NorthMet mining and ore processing proposal, both of which will be evaluated in a Supplemental Draft Environmental Impact Statement (SDEIS).

The Forest Service has proposed a land exchange as a means to eliminate conflicts with minerals development and to avoid intermingled and inefficient ownership patterns. Non-federal lands offered for consideration by PolyMet would complement existing federal ownership by eliminating or reducing private inholdings. The non-federal tracts consist of forest and wetland habitat as well as some lake frontage, and would potentially enhance public recreation opportunities. The federal lands proposed for the exchange are located in a single parcel in St. Louis County. The non-federal lands proposed for the exchange are scattered throughout Cook, Lake, and St. Louis Counties.

The proposed land exchange is described in the "Proposed NorthMet Mining Project and Land Exchange" scoping document, available in the Land & Resources Management/Projects section of the Superior National Forest (SNF) website at: [www.fs.usda.gov/goto/superior/projects](http://www.fs.usda.gov/goto/superior/projects).

Two public open houses will be held to provide opportunity for interested parties to talk one-on-one with agency representatives, learn about the proposed land exchange, and provide written scoping comments regarding the proposed land exchange. The agencies will use scoping comments to identify additional issues to be addressed in the upcoming SDEIS for the NorthMet project. Dates and locations for the public open houses follow:

**Tuesday, October 26, 2010**  
**5:00 to 8:00 pm**  
Mesabi East High School  
Commons Area  
601 North First Street West  
Aurora, MN  
218-229-3321

**Wednesday, October 27, 2010**  
**5:00 to 8:00 pm**  
New Brighton Family Services Center  
Conference Room A  
400 10<sup>th</sup> St. NW  
New Brighton, MN  
651-638-2130

Comments on the proposed land exchange may be sent to James W. Sanders, Forest Supervisor, Superior National Forest, 8901 Grand Avenue Place, Duluth, MN 55808. Comments may also be e-mailed to [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us) or faxed to 218-626-4396.

## BACKGROUND

The NorthMet project includes a proposal to construct and operate an open pit copper/nickel/cobalt/precious metals mine, an ore processing plant, and tailings basin proposed by PolyMet, near Babbitt and Hoyt Lakes in St. Louis County, Minnesota. The proposed NorthMet mine site would affect national forest lands under which PolyMet leases privately-owned mineral rights. The SNF is joining the MnDNR and USACE as a joint-lead agency to complete the required environmental analysis for the NorthMet project.

Following completion of scoping for the proposed land exchange, the next step in the process will be development of a SDEIS and opportunity for additional public review and comment. The SDEIS will contain a full analysis of the proposed land exchange between PolyMet and the SNF and allow the lead agencies to build upon the Draft EIS that was released in November 2009. The SDEIS will also provide a revised description of project alternatives and mitigation, a revised project design, and changes in response to comments on the Draft EIS. The SDEIS is expected in the summer of 2011, with the Final EIS anticipated six to nine months later. The SDEIS will be prepared jointly by MnDNR, USACE, and SNF, and will fulfill both National Environmental Policy Act (NEPA) and Minnesota Environmental Policy Act (MEPA) requirements.

**NOTICE OF EXCHANGE  
PROPOSAL  
LAND-FOR-LAND EXCHANGE**

Notice is hereby given that the Forest Service, United States Department of Agriculture (Superior National Forest), is considering an exchange of land with PolyMet Mining Inc. under the authority of the Weeks Act of March 1, 1911 as amended; the Federal Land Policy and Management Act of October 21, 1976 and the Federal Land Exchange Facilitation Act of 1988. The lands under the jurisdiction of the FS that are being considered for exchange consist of approximately 6650 acres located within the following sections:

T59N, R12W, Sections 6 & 7;  
T59N, R13W, Sections 1 thru 12, 17, & 18;

T60N, R13W, Sections 33 thru 35  
A more detailed map can be found at:  
[www.fs.usda.gov/goto/superior/projects](http://www.fs.usda.gov/goto/superior/projects)  
The non-Federal lands being offered for exchange consist of approximately 6722 acres located within the following sections:

T56N, R9W, Section 17;  
T57N, R11W, Sections 5, 6, & 8;  
T58N, R10W, Sections 15 & 22;  
T59N, R9W, Sections 7, 8, 17, 18, 30, & 31;

T59N, R16W, Sections 9, 16, 19 thru 22, & 27 thru 33;

T64N, R3E, Section 9;  
T66N, R17W, Sections 17  
A more detailed map can be found at:  
[www.fs.usda.gov/goto/superior/projects](http://www.fs.usda.gov/goto/superior/projects)

Any or all of the above-described lands may be exchanged if the values are equal. If the values are unequal, either party may equalize the values by making a cash payment, not to exceed 25 percent of the value of the lands transferred out of Federal ownership.

Both Federal and non-Federal lands considered for exchange include wetlands and floodplains. The parcels are scattered throughout Cook, Lake, and St. Louis Counties.

Persons claiming such properties or having valid objections to this proposed exchange must file their claims or objections with the Forest Supervisor of the Superior National Forest, Forest Service, United States Department of Agriculture, 8901 Grand Avenue Place, Duluth, Minnesota 55808, within 45 days after the initial date of publication of this notice.

D.N.-T. Oct. 1, 8, 15, 22, 2010

198989

## www.WDIO.com

### Public Comments on Polymet Project

Posted at: 10/15/2010 11:59 AM  
Updated at: 10/26/2010 7:16 PM  
By: Renee Passal

The USDA Forest Service, along with the US Army Corps of Engineers (USACE), and Minnesota Department of Natural Resources (MnDNR) are inviting public scoping comments on a proposed land exchange between the Forest Service and PolyMet Mining, Incorporated (PolyMet) that is being considered as part of the NorthMet mining and ore processing proposal, both of which will be evaluated in a Supplemental Draft Environmental Impact Statement (SDEIS).

The Forest Service has proposed a land exchange as a means to eliminate conflicts with minerals development and to avoid intermingled and inefficient ownership patterns. Non-federal lands offered for consideration by PolyMet would complement existing federal ownership by eliminating or reducing private inholdings.

The non-federal tracts consist of forest and wetland habitat as well as some lake frontage, and would potentially enhance public recreation opportunities. The federal lands proposed for the exchange are located in a single parcel in St. Louis County. The non-federal lands proposed for the exchange are scattered throughout Cook, Lake, and St. Louis Counties.

The proposed land exchange is described in the "Proposed NorthMet Mining Project and Land Exchange" scoping document, available in the Land & Resources Management/Projects section of the Superior National Forest (SNF) website at: [www.fs.usda.gov/goto/superior/projects](http://www.fs.usda.gov/goto/superior/projects).

Two public open houses will be held to provide opportunity for interested parties to talk one-on-one with agency representatives.

Dates and locations for the public open houses follow:

Tuesday, October 26, 2010, 5:00 to 8:00 pm

Mesabi East High School Commons Area, 601 North First Street West, Aurora, MN

Wednesday, October 27, 2010, 5:00 to 8:00 pm, New Brighton Family Services Center Conference Room A, 400 10th St. NW, New Brighton, MN

Comments can be sent to: James W. Sanders, Forest Supervisor, Superior National Forest: 8901 Grand Avenue Place, Duluth, MN 55808

Or emailed to: [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us) or faxed to: 218-262-4396

## Land exchange necessary for proposed PolyMet mine



PolyMet processing site

Local News | Carah Thomas- Mon, 10/25/2010 - 4:12pm

Attachment Size

AUDIO MP3 2.36 MB

A proposed land exchange between the U.S. Forest Service and PolyMet Mining Corporation is currently under consideration and could include a 32-acre parcel of privately owned land bordering McFarland Lake in Cook County. PolyMet is in the process of acquiring private land within the Superior National Forest to trade for about 6,650 acres of federally owned land at their proposed mine site in St. Louis County. Mary Black is Cook County Land Commissioner:

"This parcel is on the western side of McFarland Lake. It is currently owned by the trustees of Wheaton College. This parcel is being considered now for this proposed exchange. Whether or not it's utilized

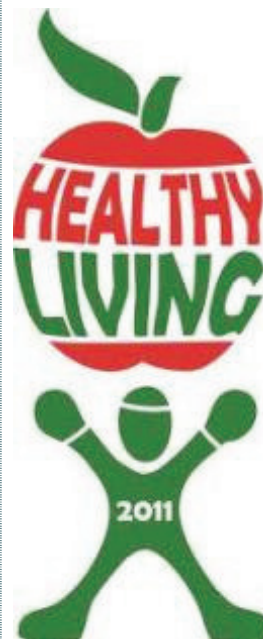
will be determined in the future. So, they're just in the infancy stages of they're doing a draft environmental impact statement. And as things play out, if you will, this parcel may or may not be included in that exchange."

Vancouver-based PolyMet is the first of several companies hoping to mine copper, nickel, and other precious metals in northeastern Minnesota. Known as non-ferrous, hardrock, or sulfide mining, it's highly controversial because it produces toxic waste rock and polluted runoff that can contaminate watersheds for hundreds, even thousands of years. The state of Wisconsin enacted a moratorium on sulfide mining in 1998 until it could be proven that similar mines in the U.S. or Canada have been operated safely, for at least ten years, "without polluting groundwater or surface water." The Wisconsin moratorium remains in effect today and no new sulfide mines have been proposed since the law was passed.

Two public open houses will be held this week to solicit comments on the proposed land exchange; Tuesday, October 26 at Mesabi East High School in Aurora, and Wednesday, October 27 at New Brighton Family Services Center in New Brighton. Both meetings are from 5-8 p.m. Written comments may also be submitted to the Superior National Forest office in Duluth. More information on the project or the open houses is available from Mark Hummel at 218-626-4303.

Critics of sulfide mining say the long term health of Minnesota's water resources, including Lake Superior and the BWCAW, are at risk. Supporters point to the economic benefits of opening up northeastern Minnesota to sulfide mining, chiefly job creation.

### Related Stories



Annual health survey does not include Cook County



Living Green: Recycled in MN

## **Appendix D**

### **Open House Sign-in Sheets**



# USFS-PolyMet Land Exchange Open House – Sign-in Sheet

10-26-2010

Name and organization	Add to Mailing List?	Email Address/Mailing Address (email is preferred)
Mark Pommer	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Stephen Ryan	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	SAL RYAN @ MCHSI.COM
Bob Tammen	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	bob Tammen @ frontiernet.net
Pat Tammen	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
CAREY YOUNG	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	JACKIE GABBY @ AOL.COM
JAMES J. PETRASKEY	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Robert L. OLSON	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	loftus5731@mchsi.com
Anna Stewart Uehling	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	astewartw@range.net.com
RUSSELL RUBER	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	r.ruber@MAIL.UNIONS-AMERICA.COM
Bus Josephson	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Bob Nanti	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	rnanti@mpower.com
Justin Mattson	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	justin mattson@yahoo.com
Jim Statzman	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Statzman4584@MSN.COM
Matt Tyler	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	tyler0045@gmail.com
Gary Blocker	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	GBlocker@wildblue.net
Bill Lander	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	blot@boisfork-nsn.gov
Bryan Harp	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	harpaboutit@yahoo.com
Scott Smolich	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Smolich 2002 @ Hot mail
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	



# USFS-PolyMet Land Exchange Open House – Sign-in Sheet

10-26-2010

Name and Organization	Add to Mailing List?	Email Address/Mailing Address (email is preferred)
Greg Topel	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Busingr294@mchsi.com
John West	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WILLgolf4eagles@yahoo.com
Iron Lee	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	ironranger22@yahoo.com
Barbara Backlund	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	207 S. 5th St. E., Aurora, MN 55705 barbara.backlund@yahoo.com
Chuck Neil	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	neil/white@Frontier.net.net
AARON ANDERSON	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	aanderson@jelicontracts.com
Jerry Fallos	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Jerry_Fallos@kleb-dan.senate.gov
eirin bonner	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	eirinntereza@gmail.com
Norm Voorhees	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	in5126@yahoo.com
Dan Jordan	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	dan.jordan@state.mn.us
Jim Plummer	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	jim.plummer@state.mn.us
Dan Harp	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Kirk J. Shields	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Jane & Steve Kerschak	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	info@elyoutfitters.com
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	

would like  
hard copies  
+ email

[illegible]

## USFS-PolyMet Land Exchange Open House – Sign-in Sheet

Name	Add to Mailing List?	Email Address/Mailing Address (email is preferred)
Lalisha Gietzen	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	lgietzen@polymetmining.com
David Hughes Jr	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	dhughesjr@polymetmining.com
Joe Scipioni	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	JSCIPIONI@POLYMETMINING.COM
Soe Samargia	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	soesamargia@gmail.com
Douglas A. Hall	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	dougahall@comcast.net
Frank Ongaro	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	fongaro@miningminnesota.com
Bill Brice	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<del>bill</del> williambrice@ msh.com
Jim Tieberg	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	JTIEBER@POLYMETMINING.COM
Ann Tieberg	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Jason Jensen	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Brad Moore	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	bmoore@barr.com
Samantha Chadwick	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Schadwick@environmentminnesota.org
Jan Norrgard	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Lnorrgard@LNMN10.com
Betsy Daub	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	betsy@Friends-bwca.org
PAUL LOVEGREN	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	plovegren@apptherm.com
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	



10/27/10

[illegible]

# USFS-PolyMet Land Exchange Open House – Sign-in Sheet

Name	Add to Mailing List?	Email Address/Mailing Address (email is preferred)
Frank Janezich	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	janezich@usfamily.net
<del>Sub</del> Sam Jammien	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
MORRIS	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	mhall.eduluh@netels.ca
Rhonda Hall	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Jim Eskolin	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Suzanne FORTNER	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	1861 Trögen Blvd. N.B.
Kerale Olsen	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	1621 West County Rd E New Brighton Minn
Dan Nelson	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	3010 Winnetka ave N, Apt 423 CRYSTAL MN 55427
Mark Hummel (USFS)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
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	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	
	<input type="checkbox"/> YES <input type="checkbox"/> NO	

55112

## **Appendix E**

### **Open House Information Boards**



# **NORTHMET PROJECT AND LAND EXCHANGE**

## **WELCOME**

### **Public Open House**

**October 26, 2010**

**5:00 – 8:00 pm**

**Mesabi East High School**

**Aurora, Minnesota**

**October 27, 2010**

**5:00 – 8:00 pm**

**New Brighton Family Center**

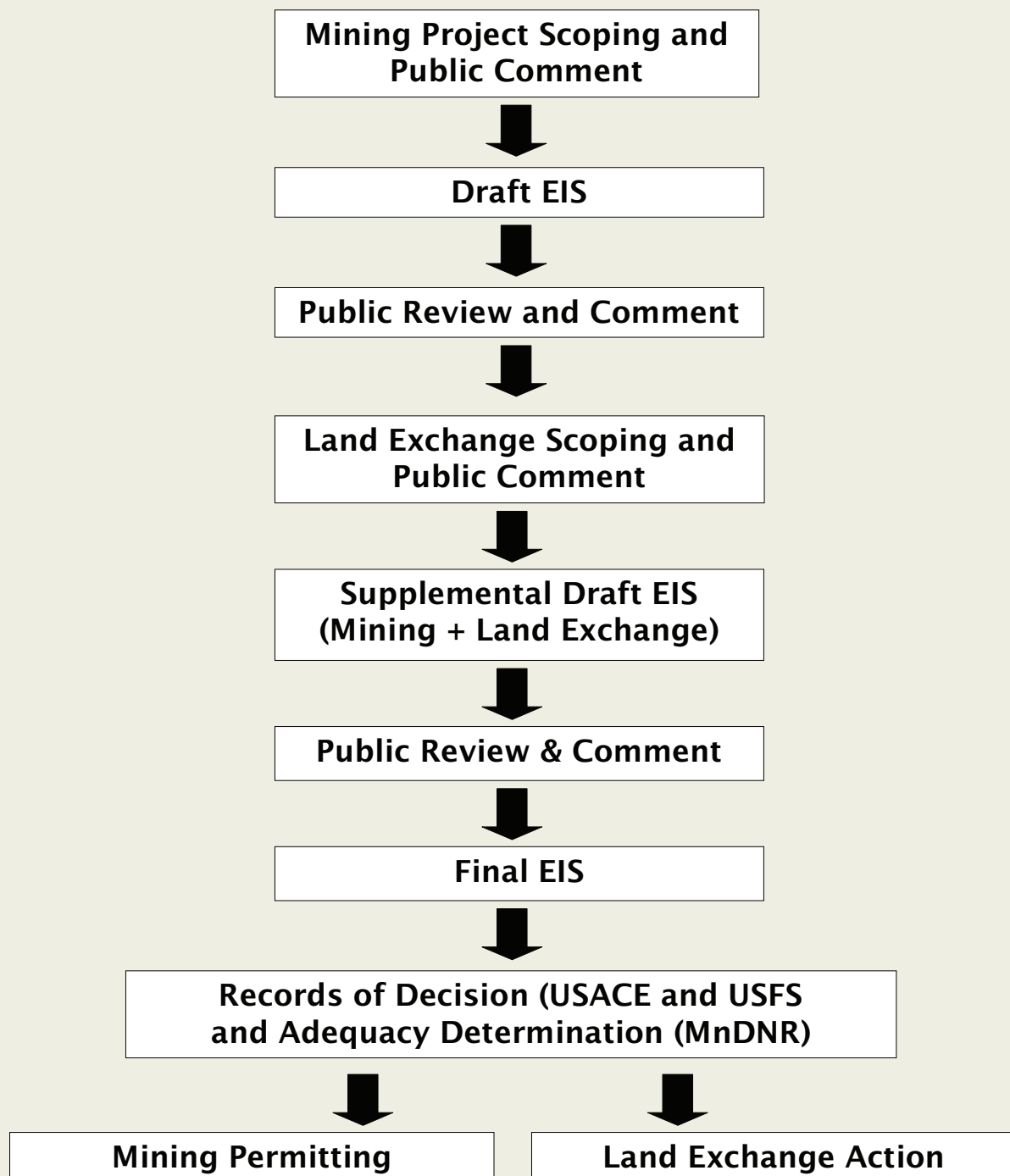
**New Brighton, Minnesota**





# NORTHMET PROJECT AND LAND EXCHANGE

## Environmental Impact Statement Process



# **NORTHMET PROJECT AND LAND EXCHANGE**

## **Projected NorthMet Project EIS Timeline**

<b>Mining Project Scoping</b>	<b>June, 2005</b>
<b>Draft EIS Published for Comment</b>	<b>November, 2009</b>
<b>Decision to Prepare SDEIS</b>	<b>June, 2010</b>
<b>Land Exchange Scoping</b>	<b>October, 2010</b>
<b>Supplemental DEIS Published for Comment</b>	<b>Summer, 2011</b>
<b>Final EIS Published</b>	<b>Spring, 2012</b>
<b>Co-Lead Agencies Records of Decision and Adequacy Determination</b>	<b>Summer, 2012</b>



# NORTHMET PROJECT AND LAND EXCHANGE

## NorthMet Project Overview

- Surface mining of low-grade disseminated sulfide mineral ore.
- Mineral processing and tailings basin
- Production of copper & nickel concentrates; copper metal; and nickel, cobalt, & precious metal precipitates
- The land exchange is a connected action to the mining and processing proposal and includes:
  - 6,650 acres of federal lands at the NorthMet site in St. Louis County
  - 6,722 acres (5 tracts) of non-federal lands within St. Louis, Lake, and Cook Counties





# NORTHMET PROJECT AND LAND EXCHANGE

## What is a Land Exchange?

Land exchanges are discretionary, voluntary real estate transactions between the federal government and non-federal parties that serve the public interest based on an environmental analysis.

They are done to achieve better management of federal lands and resources, to meet the needs of state and local residents and their economies, and to secure important objectives related to Forest resources.

### Steps for a Land Exchange:

- Feasibility Analysis
- Agreement to Initiate
- Real estate transaction steps (concurrent with NEPA process):
  - Resolve title issues
  - Appraisal to determine equal market value
  - Environmental site assessment (and remediation, if needed)
  - Boundary surveys
- Congressional approval period
- Real estate closing

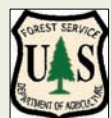




# NORTHMET PROJECT AND LAND EXCHANGE

## Comment Process

- Scoping comments will be used to determine significant issues, develop alternatives to the proposed action, determine the scope of analysis, and refine the analysis of effects.
- Submit written comments by November 29, 2010 using one of the following methods:
  - Submit at the public open houses (October 26 & 27th)
  - Send by e-mail or attached text document (using Microsoft software applications and PDF documents) to:  
[comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us)
  - Fax to: (218) 626-4396
  - Send by mail to: James W Sanders, Forest Supervisor  
Superior National Forest  
8901 Grand Avenue Place  
Duluth, MN 55808
- Tips to effectively communicate your message:
  - Be clear, concise, and relevant to the analysis.
  - Be specific with your concerns using objective language.
  - Provide solutions oriented positions with examples versus comments that simply support or oppose the project.
  - Ask questions, identify gaps, and propose alternatives to particular issues of concern.

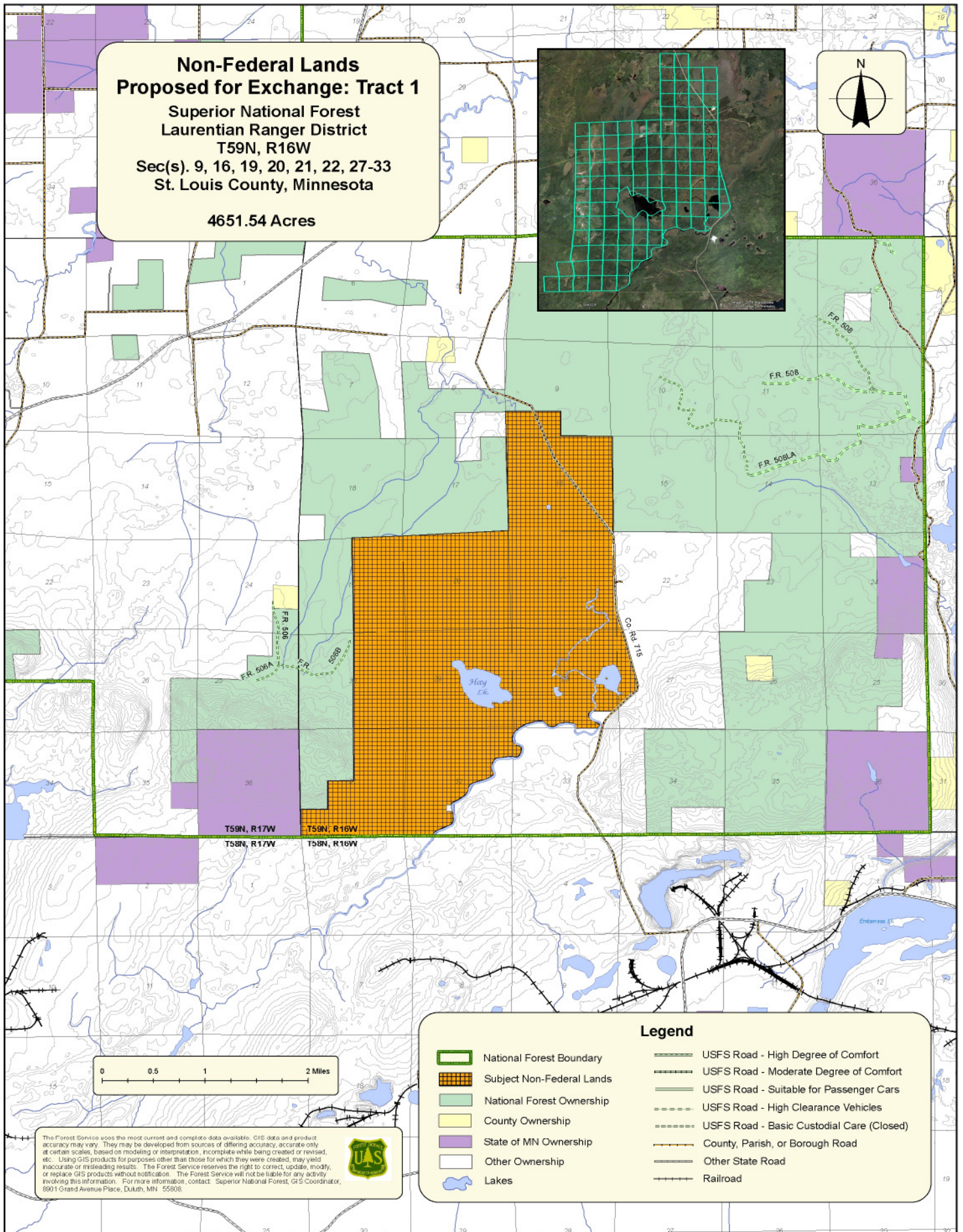
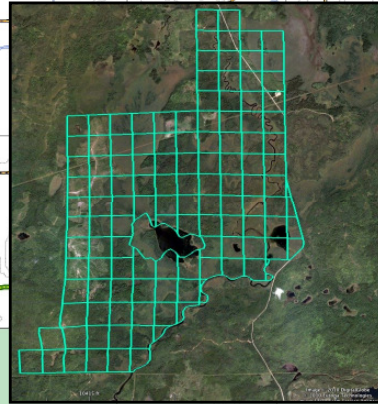




# **Non-Federal Lands Proposed for Exchange: Tract 1**

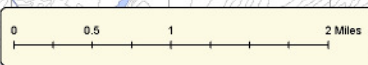
Superior National Forest  
Laurentian Ranger District  
T59N, R16W  
Sec(s). 9, 16, 19, 20, 21, 22, 27-33  
St. Louis County, Minnesota

4651.54 Acres



## **Legend**

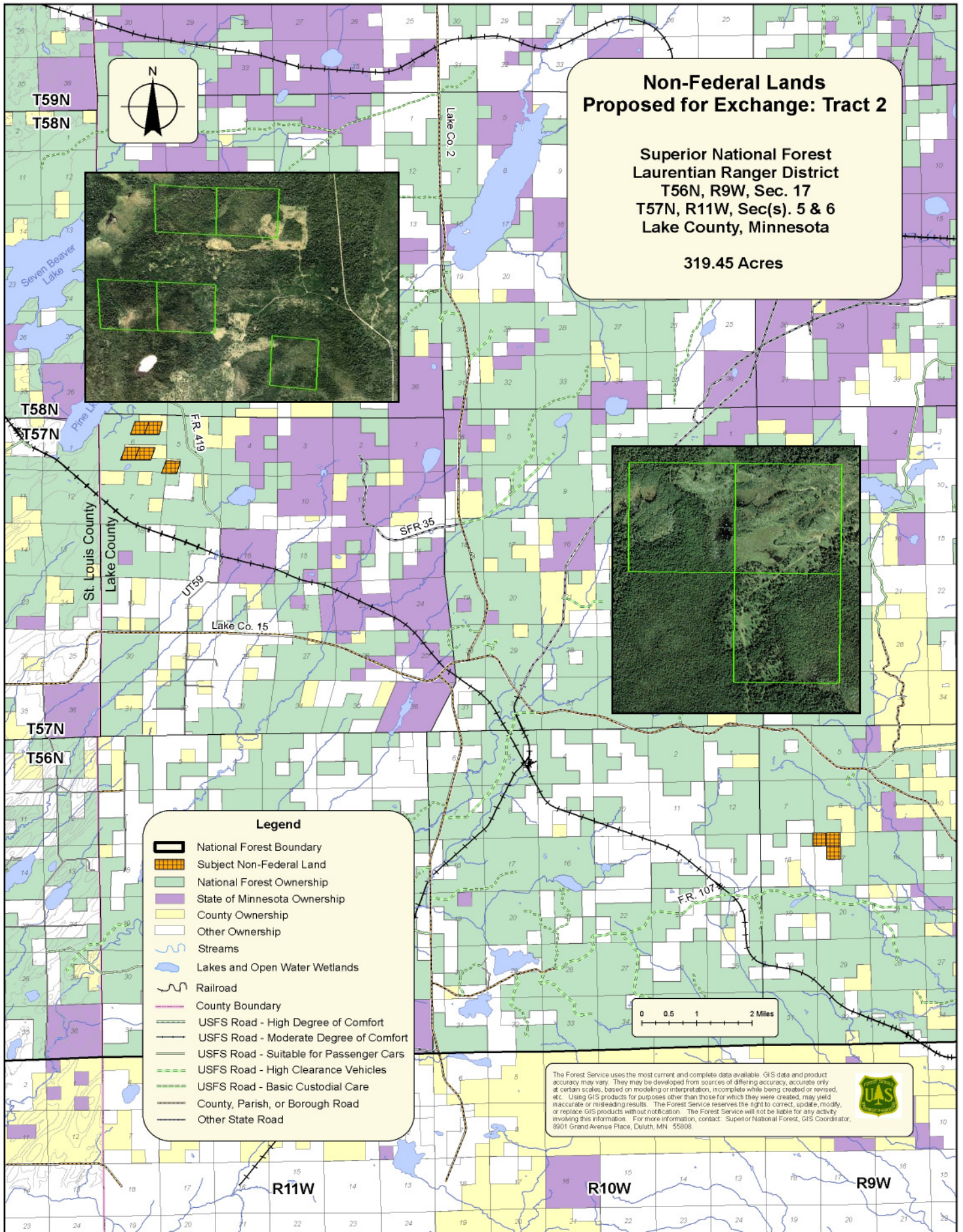
- |                           |   |
|---------------------------|---|
| National Forest Boundary  | USFS Road - High Degree of Comfort        |
| Subject Non-Federal Lands | USFS Road - Moderate Degree of Comfort    |
| National Forest Ownership | USFS Road - Suitable for Passenger Cars   |
| County Ownership          | USFS Road - High Clearance Vehicles       |
| State of MN Ownership     | USFS Road - Basic Custodial Care (Closed) |
| Other Ownership           | County, Parish, or Borough Road           |
| Lakes                     | Other State Road                          |
|                           | Railroad                                  |



The Forest Service uses the most current and complete data available. GIS data and product accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those for which they were created, may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. The Forest Service will not be liable for any activity involving this information. For more information, contact: Superior National Forest, GIS Coordinator, 6901 Grand Avenue Place, Duluth, MN 55808.





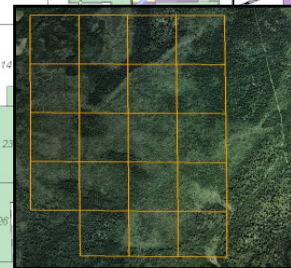
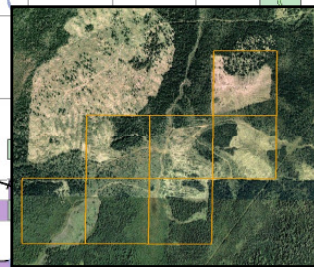
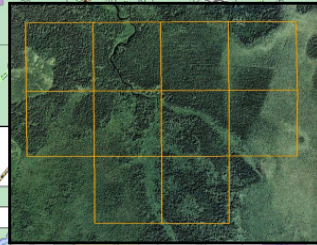




## Non-Federal Lands Proposed for Exchange: Tract 3

Superior National Forest  
La Croix Ranger District  
T59N, R9W, Sec(s). 7, 8, 17 & 18  
T59N, R9W, Sec(s). 30 & 31  
T58N, R10W, Sec(s). 15 & 22  
T57N, R11W, Sec. 8  
Lake County, Minnesota

1559.39 Acres

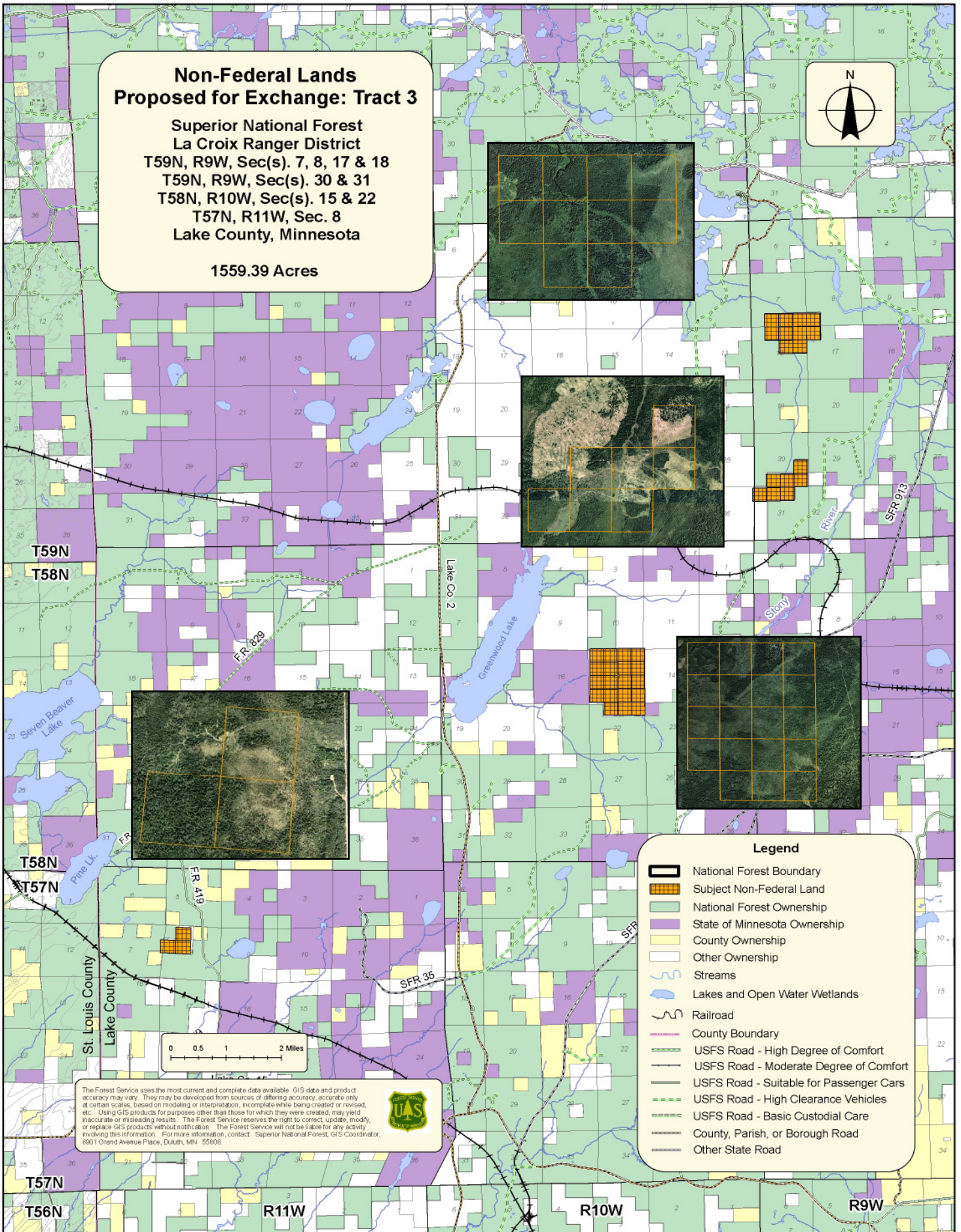


### Legend

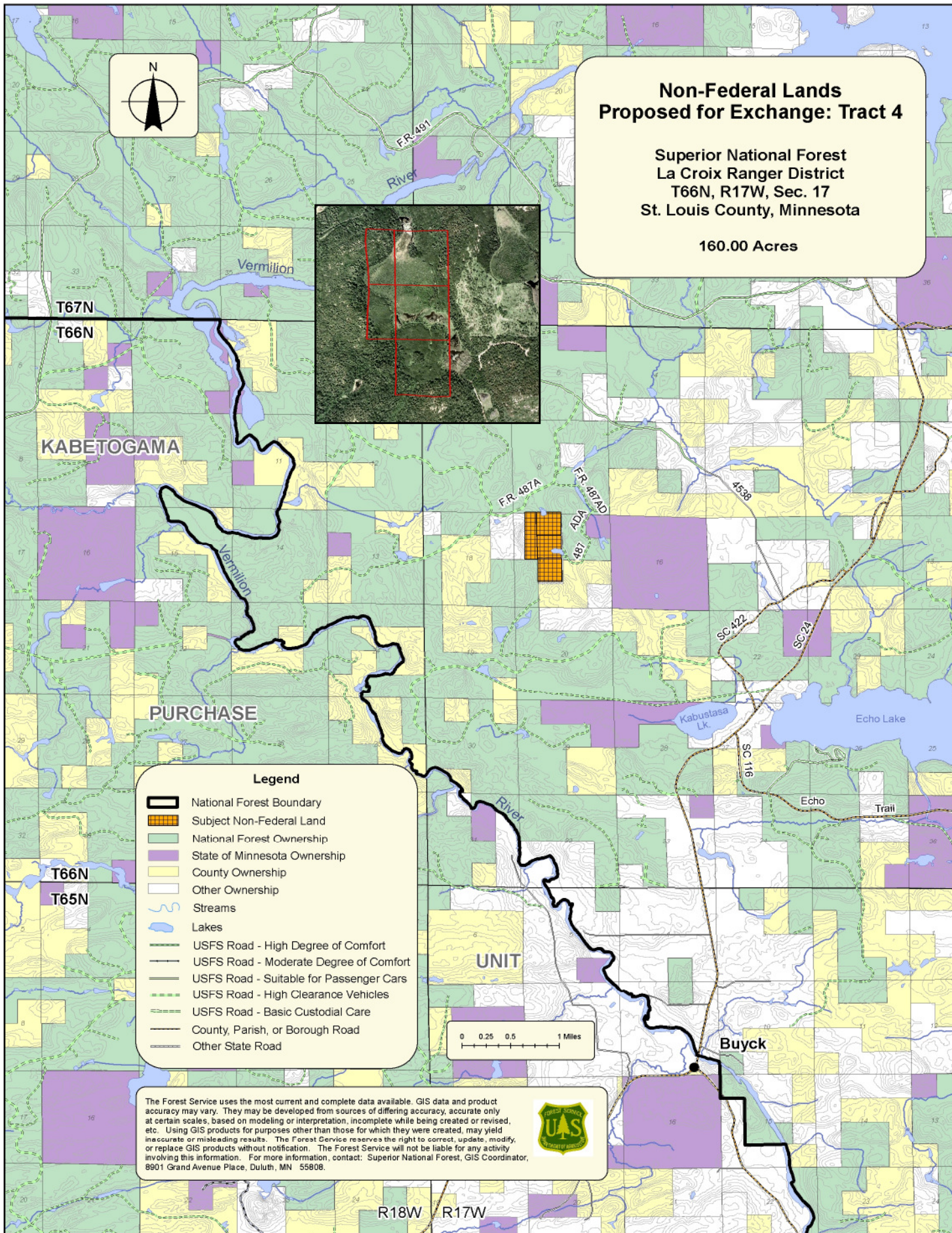
- National Forest Boundary
- Subject Non-Federal Land
- National Forest Ownership
- State of Minnesota Ownership
- County Ownership
- Other Ownership
- Streams
- Lakes and Open Water Wetlands
- Railroad
- County Boundary
- USFS Road - High Degree of Comfort
- USFS Road - Moderate Degree of Comfort
- USFS Road - Suitable for Passenger Cars
- USFS Road - High Clearance Vehicles
- USFS Road - Basic Custodial Care
- County, Parish, or Borough Road
- Other State Road

0 0.5 1 2 Miles

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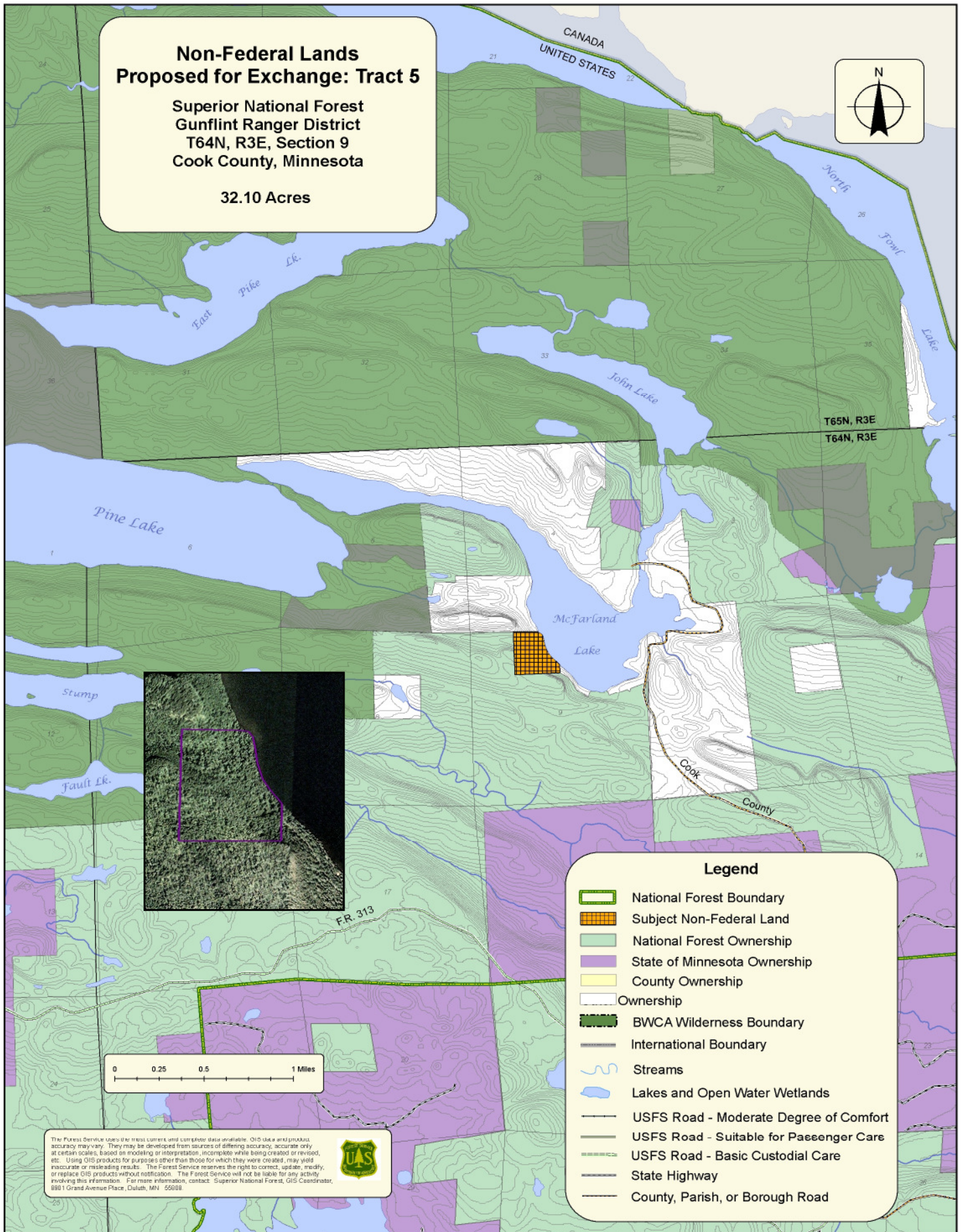




# **Non-Federal Lands Proposed for Exchange: Tract 5**

Superior National Forest  
Gunflint Ranger District  
T64N, R3E, Section 9  
Cook County, Minnesota

32.10 Acres



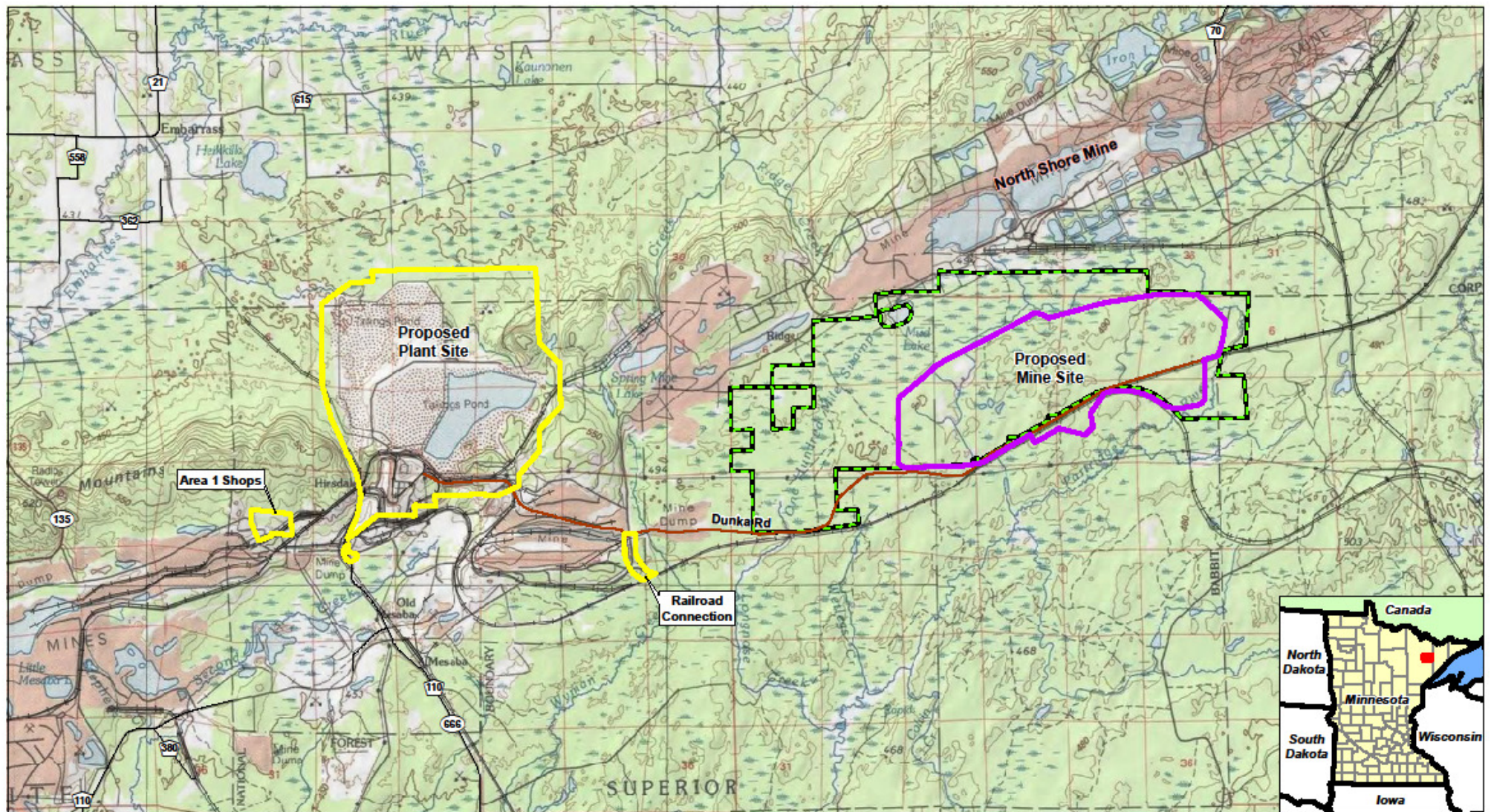
## **Legend**

- National Forest Boundary
- Subject Non-Federal Land
- National Forest Ownership
- State of Minnesota Ownership
- County Ownership
- Ownership
- BWCA Wilderness Boundary
- International Boundary
- ~~~~~ Streams
- ~~~~~ Lakes and Open Water Wetlands
- USFS Road - Moderate Degree of Comfort
- USFS Road - Suitable for Passenger Care
- USFS Road - Basic Custodial Care
- State Highway
- County, Parish, or Borough Road

The Forest Service uses the most current and complete data available. GIS data and products accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those for which they were created, may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify, or replace GIS products without notification. The Forest Service will not be liable for any activity involving this information. For more information, contact: Superior National Forest, GIS Coordinator, 8901 Grand Avenue Place, Duluth, MN 55808.







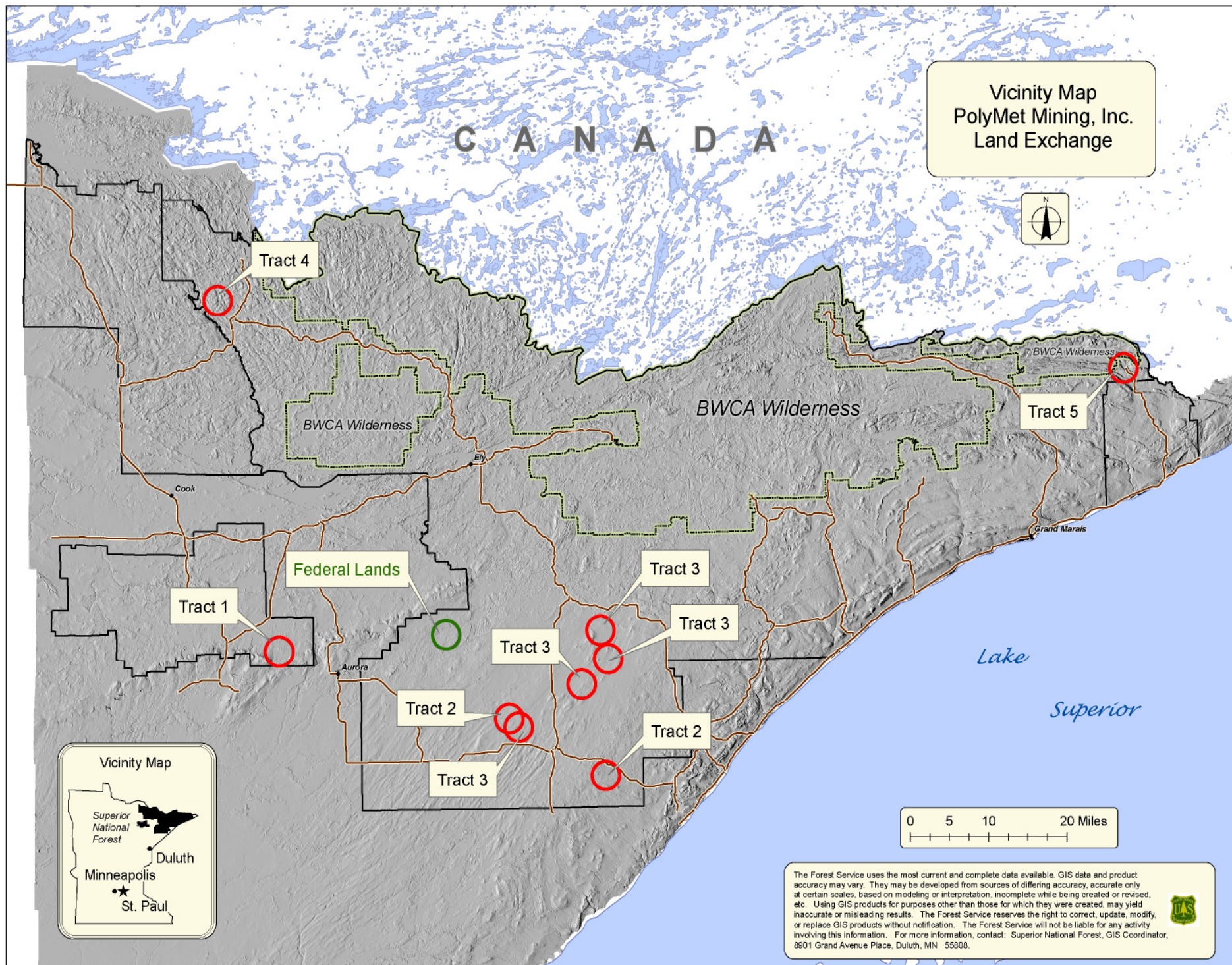
- Proposed Plant Site Boundary
- Proposed Mine Site Boundary
- Proposed Land Exchange Boundary
- Existing Dunka Road
- Existing Railroad



**NorthMet Project Overview Map**  
 St. Louis County, Minnesota  
 October, 2010









## **Appendix F**

### **Database Reports**

# Polymet Land Exchange Scoping Comment Analysis (Draft)

Friday, May 06, 2011

<i>Form Letter ID</i>	<i>Name:</i>	<i>Number</i>		
3	Form Letter 3	705	Total Submissions	1451
1	Form Letter 1	539	Total Comments	988
0	Unique	197	Total Comments with issue codes*	1177
2	Form Letter 2	10		

<i>Issue Code:</i>	<i>Description:</i>	<i>Number of Comments</i>
SOO	Statement of Opinion	372
MRK	Market Value	120
MPD	Mine Project and DEIS Issues	102
PLN	Conformance with USFS Plans and Objectives	81
WET	Wetland Resources	60
LEG	Mineral Rights and Legal Authorities	47
WAT	Water Resources	46
NPR	NEPA Process and Requirements	39
GSA	General SDEIS Analysis	37
SOC	Socio-economic Impacts	36
TES	Threatened, Endangered, and Special Status Species Issu	35
CUI	Cultural Impacts	35
VWH	Vegetation, Wildlife, and Habitat	31
ALT	Alternatives for Consideration	26
CUM	Cumulative Impacts	26
FOR	Forest Resources	15
OOS	Out of Scope	13
CCC	Climate Change and Carbon Accounting	13
AIR	Air Quality and Noise	11
HAZ	Contamination Issues and Phase I/II Assessments	10
ECO	Ecological Function and Value	8
PAC	Public Access Concerns	7
FEA	Feasibility Analysis Issues	6

\* Comments may be coded with more than one issue

# PolyMet Land Exchange Scoping Comments

Report generated on 5/6/2011

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-001	Larry Adams		11/15/2010	Email	Form Letter 1	9	CUI;CUM;FOR;GSA;MRK;SOO;TES;VWH;WAT;WET	3149 36th Avenue South Minneapolis, MN 55406
LE-002	Ryan Anderson		11/18/2010	Email	Form Letter 1			1212 Washington Memorial Drive Apt 208 St.Cloud, MN 56301
LE-003	Angela Anderson		11/20/2010	Email	Form Letter 1			1121 North 4th Street Stillwater, MN 55082
LE-004	Melis Arik		11/29/2010	Email	Form Letter 1			28 Conan St Ely, MN 55731
LE-005	James And Judith Arnol		11/27/2010	Email	Form Letter 1			8822 West River Rd Brooklyn Park, MN 55444
LE-006	Janet Asanchev		11/16/2010	Email	Form Letter 1	3	MRK;OOS;SOO	1378 Como Blvd. East St. Paul, MN 55117
LE-007	Carol Ashley		11/16/2010	Email	Form Letter 1			21134 Finch Dr Park Rapids, MN 56470
LE-008	Margie & David Back		11/16/2010	Email	Form Letter 1			6846 Forestry Rd Lake Nebagamom, WI 54849
LE-009	Wanda Ballentine		11/17/2010	Email	Unique	10	CUI;FOR;GSA;MPD;MRK;SOO;TES;VWH;WET	1200 Town Centre Eagan, MN 55123
LE-010	Alex Barbeau		11/15/2010	Email	Form Letter 1			5305 3rd Ave S Minneapolis, MN 55419
LE-011	Bob Bartlett		11/16/2010	Email	Form Letter 1			5080 Silver Lake Rd. Mounds View, MN 55112
LE-012	Andrew Bell		12/7/2010	Email	Form Letter 1	1	SOO	217 Washburn Av N. Minneapolis, MN 55405
LE-013	Cherrie Bennethum		11/15/2010	Email	Form Letter 1			1421 Marion St. Saint Paul, MN 55117
LE-014	Marilyn Benson		11/15/2010	Email	Form Letter 1			1495 Raymond Ave. St. Paul, MN 55108

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-015	Brook Bernini		11/23/2010	Email	Form Letter 1			870 W Alameda St Tucson, AZ 85745
LE-016	Brent Gurtek		11/16/2010	Email	Form Letter 1			1873 Korkki Road Duluth, MN 55804
LE-017	Shar Bjerke		11/16/2010	Email	Form Letter 1			9873 7th Street NE Blaine, MN 55434
LE-018	Dennis A. Bloomquist		11/15/2010	Email	Form Letter 1			219 West Kent Road Duluth, MN 55812
LE-019	Amanda Boegh		12/1/2010	Email	Form Letter 1			3923 Upper 73rd Street East Inver Grove Heights, MN 55076
LE-020	A Bonvouloir		11/15/2010	Email	Form Letter 1			PO Box 70185 Sunnyvale, CA 94086
LE-021	Chip Borkenhagen		11/15/2010	Email	Form Letter 1	1	SOO	201 West Laurel Street Brainerd, MN 56401
LE-022	Lauren Brady		11/29/2010	Email	Form Letter 1			1912 3rd Avenue South Minneapolis, MN 55404
LE-023	Thomas Brinkman		11/15/2010	Email	Form Letter 1	2	GSA;MRK	1623 Teton Court NE Rochester, MN 55906
LE-024	Laurel Browne		11/27/2010	Email	Form Letter 1			734 Lexington Parkway North Saint Paul, MN 55104
LE-025	Renee Brown		11/15/2010	Email	Form Letter 1			6840 Park View Lane Eden Prairie, MN 55346
LE-026	Richard Brown		11/22/2010	Email	Unique	2	SOO	
LE-027	Robert Bullis		11/16/2010	Email	Form Letter 1			19088 Dodge Street NW Elk River, MN 55330
LE-028	Chris Burda		11/15/2010	Email	Form Letter 1			4136 5th Ave S Minneapolis, MN 55409
LE-029	Shelli Burns		11/17/2010	Email	Form Letter 1			3916 Monterey Ave. St. Louis Park, MN 55416
LE-030	David Butcher		11/22/2010	Email	Form Letter 1			3998 67th St SW Pequot Lakes, MN 56472
LE-031	Scott Cady		11/15/2010	Email	Form Letter 1			5652 Pillsbury Ave South Minneapolis, MN 55419
LE-032	Alan Carlson		11/16/2010	Email	Form Letter 1			2301 Long Ave Saint Paul, MN 55114



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-033	Julie Champlin		11/17/2010	Email	Form Letter 1	1	SOC;SOO	1711 1st Ave SE Austin, MN 55912
LE-034	Jeff Charity		11/15/2010	Email	Form Letter 1			PO Box 252 South Paris, ME 04281
LE-035	Barbara Clark		11/15/2010	Email	Form Letter 1			73 Martin Way Vadnais Heights, MN 55127
LE-036	Jane Clements		11/15/2010	Email	Form Letter 1			1335 Walsh Road Ely, MN 55731
LE-037	Carolyn Clements		11/18/2010	Email	Form Letter 1			601 Sunset Dr. Minnetonka, MN 55305
LE-038	Jerome Comeau		11/23/2010	Email	Form Letter 1			3316 Emerson Ave S Minneapolis, MN 55408
LE-039	James And Sara Conwa		11/15/2010	Email	Form Letter 1			4620 Valley DR NW Rochester, MN 55901
LE-040	Shirley Cox		11/26/2010	Email	Form Letter 1			4300 West River Parkway Apt 135 Minneapolis, MN 55406
LE-041	Deborah Crocker		11/18/2010	Email	Form Letter 1	1	SOO	3012 Darling Dr. Alexandria, MN 56308
LE-042	Barbara Crow		12/4/2010	Email	Form Letter 1			1982 Lismore Rd Duluth, MN 55804
LE-043	Greg Damberg		11/15/2010	Email	Form Letter 1			4332 Reiland Lane Shoreview, MN 55126
LE-044	Jon Damon		11/17/2010	Email	Form Letter 1			10932 Beard Ave South Bloomington, MN 55431
LE-045	Chad Debaker		11/23/2010	Email	Form Letter 1			4147 26th Ave South Minneapolis, MN 55406
LE-046	Diadra Decker	Water Legacy Board	11/29/2010	Email	Unique	1		
LE-047	Gudrun Dennis		11/16/2010	Email	Form Letter 1			5912 NW 26th Street Gainesville, FL 32653
LE-048	Jim Digatono		11/15/2010	Email	Form Letter 1			10645 Boundary Creek Terrace Maple Grove, MN 55369
LE-049	Emily Dixon		11/16/2010	Email	Form Letter 1			6771 S Silver Hill Dr Finland, MN 55603
LE-050	Thomas Doyle		11/23/2010	Email	Form Letter 1			9800 28th Ave N Plymouth, MN 55441

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-051	Blake Durtsche		11/15/2010	Email	Form Letter 1			1702 Washington St. Apt 102 San Francisco, CA 94109
LE-052	William Dustin		11/29/2010	Email	Unique	2	ECO;MRK;SOO	7171 Mid Oaks Ave Stillwater, MN 55082
LE-053	Jeff Kopp		10/14/2010	Email	Unique	6	MRK;NPR;SOO	
LE-054	Nanette Echols		11/15/2010	Email	Form Letter 1			1256 James Ave St. Paul, MN 55105
LE-055	Alison Edgerton		11/22/2010	Email	Form Letter 1			2009 Hogans Island Drive NW Backus, MN 56435
LE-056	Dean Einerson		11/17/2010	Email	Form Letter 1			706 High Street Duluth, MN 55805
LE-057	Joan Ellison		11/22/2010	Email	Form Letter 1	1	SOO	20740 410th St Pelican Rapids, MN 56572
LE-058	Jonathan Engel		11/16/2010	Email	Form Letter 1	1	SOO	221 Washburn Ave N Minneapolis, MN 55405
LE-059	Laura Farwell		11/15/2010	Email	Form Letter 1			211 North Lakeshore Blvd Marquette, MI 49855
LE-060	Mike Ferguson		11/15/2010	Email	Form Letter 1			114 Lincoln Street Mankato, MN 56001
LE-061	Sharon Fortunak		11/15/2010	Email	Form Letter 1			7120 Ivystone Ave South Cottage Grove, MN 55016
LE-062	Madelynn Frazier		11/15/2010	Email	Form Letter 1	1	SOO	1826 East Woodbine Street Springfield, MO 65803
LE-063	Kristin Larsen	Friends Cloquet Val. Fo	11/24/2010	Email	Unique	15	ALT;ECO;MPD;MRK;PLN;SOO;TES;VWH;WAT;WET	
LE-064	Richard Fuller		11/17/2010	Email	Form Letter 1			1081 Laurel Ave Saint Paul, MN 55104
LE-065	Annie Gardner		11/15/2010	Email	Form Letter 1			1906 1st Ave South Minneapolis, MN 55403
LE-066	Grant Gravdahl		11/29/2010	Email	Form Letter 1	1	SOO	PO Box 303 Pequot Lakes, MN 56472
LE-067	Kathryn Gilje		11/16/2010	Email	Form Letter 1			5117 Lawton Avenue Oakland, CA 94618

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-068	DUPLICATE		11/29/2010	Email	Form Letter 1			
LE-069	Melvin Green		1/6/2010	Email	Form Letter 1			4059 Pennsylvania Ave Eagan, MN 55123
LE-070	Janice Greenfield		11/21/2010	Email	Unique	4	CUI;GSA;SOO;TES;V WH;WAT;WET	1793 Rome Ave Saint Paul, MN 55116
LE-071	Brent Gurtek		11/16/2010	Email	Form Letter 1			1873 Korkki Road Duluth, MN 55804
LE-072	Dale Hadler		11/20/2010	Email	Form Letter 1			PO Box 6397 Minneapolis, MN 55406
LE-073	Chris Haenisch		11/19/2010	Email	Form Letter 1			505 54th Ave NE Fridley, MN 55421
LE-074	Mike Harmon		11/15/2010	Email	Form Letter 1			4200 Walnut St. West Des Moines, IA 50265
LE-075	Shirley Cox		11/26/2010	Email	Form Letter 1			4300 West River Parkway Apt 135 Minneapolis, MN 55406
LE-076	Sandy Hartmann		11/20/2010	Email	Form Letter 1			4515 Lyndale South Minneapolis, MN 55419
LE-077	Kevin Hay		11/15/2010	Email	Form Letter 1			603 Dillon Ave N Montrose, MN 55363
LE-078	James Herther		11/18/2010	Email	Form Letter 1			1585 Cohansey # 201 St Paul, MN 55117
LE-079	Michelle Hesterberg		11/15/2010	Email	Form Letter 1			300 N. College St. Northfield, MN 55057
LE-080	Bill Herzberg		11/23/2010	Email	Form Letter 1			6971 Cramer Rd Finland, MN 55603
LE-081	Russell And Cynthia Ho		11/28/2010	Email	Unique	4	MPD	2151 Folwell Ave. Falcon Heights, MN 55108
LE-082	Christine Hoffman		11/20/2010	Email	Form Letter 1			950 Country Road 88 SW Alexandria, MN 56308
LE-083	Terry Hokenson		11/19/2010	Email	Form Letter 1			3352 Prospect Ter SE Minneapolis, MN 55414
LE-084	Richard Huey		11/17/2010	Email	Form Letter 1			351 E. Arch St. Marquette, MI 49855
LE-085	Richard Huey		11/20/2010	Email	Form Letter 1			351 E. Arch St. Marquette, MI 49855



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-086	Krissy Hughes		11/15/2010	Email	Form Letter 1			4399 Jenny LN NW Bemidji, MN 56601-8749
LE-087	Kasey Hutchinson		11/19/2010	Email	Form Letter 1			606 S Third Marquette, MI 49855
LE-088	David Inman		11/29/2010	Email	Form Letter 1			1858 Southpointe Terr Eagan, MN 55122
LE-089	Dan Iverson		11/16/2010	Email	Form Letter 1			4640 North Arm Drive Mound, MN 55364
LE-090	Dan Iverson		12/2/2010	Email	Unique	1	SOO	
LE-091			11/17/2010	Email	Form Letter 1			1329 East Harvey Ely, MN 55731
LE-092	Gail Jacobson		11/16/2010	Email	Form Letter 1			1747 Carl St St Paul, MN 55113
LE-093	Diane Jankord		11/16/2010	Email	Form Letter 1			1430 West 280th Street New Prague, MN 56071
LE-094	Stephen Jay		11/16/2010	Email	Form Letter 1	2	SOO	7435 Central Ave Indianapolis, IN 46240
LE-095	Mimi Jennings		11/19/2010	Email	Form Letter 1			2222 Hillside St Paul, MN 55108
LE-096	Erik Jensen		11/17/2010	Email	Form Letter 1	1	SOO	4345 11th Ave. S Minneapolis, MN 55407
LE-097			11/20/2010	Email	Form Letter 1			1329 East Harvey Ely, MN 55731
LE-098	Matt Johansen		11/15/2010	Email	Form Letter 1			10355 Greenfield Road Greenfield, MN 55357
LE-099	David Johanson		11/15/2010	Email	Form Letter 1			2233 Sierra Drive White Bear Lake, MN 55110
LE-100	Elisabeth Johnson		11/15/2010	Email	Form Letter 1			510 Newton Ave SE Watertown, MN 55388-8800
LE-101	Ian Johnson		11/16/2010	Email	Form Letter 1			411 Wheeler St. N St. Paul, MN 55104
LE-102	Steve Jorgenson		12/3/2010	Email	Form Letter 1			2116 Iglehart Ave. St. Paul, MN 55104
LE-103	Edward Kacura		11/15/2010	Email	Form Letter 1			12122 N Blacktail Rd #A Marana, AZ 85653
LE-104	Jamie Kaiser		10/20/2010	Email	Unique	1	NPR	

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-105	Scot Kindschi		11/15/2010	Email	Form Letter 1	1	SOO	110 E. Redwood St Marshall, MN 56258
LE-106	Amy Kireta		11/16/2010	Email	Form Letter 1	1	SOO	215 W. Chapman St Ely, MN 55731
LE-107	Jeff Kitterman		11/15/2010	Email	Form Letter 1			11623 Adobe Tr Sauk Centre, MN 56378
LE-108	Sarah Klette		11/15/2010	Email	Form Letter 1			8315 141st St. W. Apple Valley, MN 55124
LE-109	Barb Knoth		11/21/2010	Email	Form Letter 1	1	SOO	1514 Albany Ave St Paul, MN 55108
LE-110	Karl Knutsen		11/22/2010	Email	Form Letter 1			P. O. Box 6385 Minneapolis, MN 55406-0385
LE-111	Kay Koelkerwestby		11/16/2010	Email	Form Letter 1			308 1st St. N. E. Buffalo, MN 55313
LE-112	Kathy Kormanik		11/16/2010	Email	Form Letter 1			8609 40th Ave. N Minneapolis, MN 55427
LE-113	Kevin Koschak		11/17/2010	Email	Form Letter 1			2384 151st Ave NW street 2
LE-114	Kevin Koschak		11/29/2010	Email	Form Letter 1			2384 151st Ave NW street 2
LE-115	Mark Kowaliw		11/15/2010	Email	Form Letter 1			2909 princeton ave st louis park, MN 55416
LE-116	Kristi Kraling		11/16/2010	Email	Form Letter 1			28681 Co. 16 Preston, MN 55965
LE-117	Kristi Kraling		11/23/2010	Email	Form Letter 1			28681 Co 16 Preston, MN 55965
LE-118	Jedidiah Krauss		11/20/2010	Email	Form Letter 1			1014 Sunnyview Ln Minnetonka, MN 55305
LE-119	Martha Krikava		11/15/2010	Email	Form Letter 1			9696 101st St N. Stillwater, MN 55082
LE-120	Thomas Krumme		11/29/2010	Email	Form Letter 1			901 2nd St. NE #205 Minneapolis, MN 55413
LE-121	Dave Lais		11/25/2010	Email	Form Letter 1			3176 195th Avenue NE
LE-122	Lynn Lang		11/15/2010	Email	Form Letter 1			1721 Polaris Court Saint Cloud, MN 56303
LE-123	Kristin Larsen	Friends Cloquet Val. Fo	11/25/2010	Email	Unique			

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-124	David Lien		11/15/2010	Email	Form Letter 1	2		1026 Cheyenne Villas Pt. Colorado Springs, CO 80906
LE-125	Jonathan Lien		12/7/2010	Email	Unique	2	SOO	
LE-126	Patricia Liquard		11/15/2010	Email	Form Letter 1			200 Mississippi River Blvd N #3D St Paul, MN 55104
LE-127	Mary Litfin		12/10/2010	Email	Form Letter 1			1302 So. 1st St. Stillwater, MN 55082
LE-128	Charlotte Loonsfoot		11/27/2010	Email	Form Letter 1			415 Spruce St Baraga, MI 49908
LE-129	Liz Lundquist		11/15/2010	Email	Form Letter 1			2612 Cutters Grove Ave. Apt. 206 Anoka, MN 55303
LE-130	Mary Smith		11/15/2010	Email	Form Letter 1	5	SOO	13998 165th Street Little Falls, MN 56345
LE-131	Paula Maccabee	Just Change Law Office	11/29/2010	Email	Unique			1961 Selby Ave St. Paul, MN 55104
LE-132	Sharon Magliulo		11/17/2010	Email	Form Letter 1			821 E. Pattison St. Ely, MN 55731
LE-133	Ann Marie		11/16/2010	Email	Form Letter 1			15555 Flight Way St Paul, MN 55124
LE-134	Andrew Marolt		11/18/2010	Email	Form Letter 1			110 W Conan St Ely, MN 55731
LE-135	Levi Martfeld		11/16/2010	Email	Form Letter 1			150 2nd Street NE Apt 106 Minneapolis, MN 55413
LE-136	Karen Matthew		12/16/2010	Email	Form Letter 1			1430 Spruce Place Apt 301 Minneapolis, MN 55403
LE-137	Clairvaux Mcfarland		11/16/2010	Email	Form Letter 1			1001 14th St NW Rochester, MN 55901
LE-138	Clair Lynn Mcguigan		11/22/2010	Email	Form Letter 1			39579 Arrowhead Drive Pine River, MN 56474
LE-139	Jim Mckeehen		11/30/2010	Email	Form Letter 1			9807 Rosemill Circle Champlin, MN 55316
LE-140	Kelley Meister		11/22/2010	Email	Form Letter 1			2427 Chicago Ave Minneapolis, MN 55404

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-141	Shirley Merkling		11/15/2010	Email	Form Letter 1			875 Lake Street Saint Paul, MN 55119
LE-142	Joseph Merz		12/9/2010	Email	Form Letter 1			111 W. Lincoln Ave., #305 Fergus Falls, MN 56537
LE-143	Daniel Messinger		11/15/2010	Email	Form Letter 1	1	SOO	5761 SW 47th St Miami, FL 33155
LE-144	James Mickelson		12/10/2010	Email	Form Letter 1			4817 75th ST SE Rochester, MN 55904
LE-145	Eeva Miller		11/19/2010	Email	Form Letter 1			701 W. Hampton St. Marquette, MI 49855
LE-146	Jim Miller		11/16/2010	Email	Form Letter 1			10870 Artesian Ln Woodbury, MN 55129
LE-147	Gregory Mirocha		11/15/2010	Email	Form Letter 1			31247 Genesis Ave Stacy, MN 55079
LE-148	Margot Monson		11/29/2010	Letter	Unique	6	FOR;GSA;MPD;MRK; SOO;TES;WET	22 Ludlow Avenue St. Paul, MN 55108
LE-149	Kathleen Moraski		11/15/2010	Email	Form Letter 1			7611 Teal Bay Woodbury, MN 55125
LE-150	Mary Moriarty		11/28/2010	Email	Form Letter 1	1	LEG	3885 Niagara Ln N Plymouth, MN 55446
LE-151	Linda Morris		11/16/2010	Email	Unique	5	MPD;SOO;WET	3229 Colorado Ave S St. Louis Park, MN 55416
LE-152	Paul Moss		11/16/2010	Email	Form Letter 1			1849 Whitaker St. White Bear Lake, MS 55110
LE-153	John Mowery		11/17/2010	Email	Form Letter 1			6034 Upton Ave S Minneapolis, MN 55410
LE-154	Michael Smith		11/15/2010	Email	Unique	1	SOO	6715 N. Table Mt. Road Tuscon, AZ 85718
LE-155	Mary Suelflow		11/29/2010	Email	Form Letter 1			508 Jewett Street Marshall, MN 56258
LE-156	Elizabeth Mullen		11/17/2010	Email	Form Letter 1			3419 Elliot Avenue South Minneapolis, MN 55407
LE-157	Susan Mullin		11/22/2010	Email	Form Letter 1			8311 Fairfield Rd Brooklyn Park, MN 55444
LE-158	Rosa Musket		11/21/2010	Email	Form Letter 1			East Prospect Marquette, MI 49855



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-159	Nancy Giguere		11/16/2010	Email	Form Letter 1	1	MPD	1471 Edmund Ave Saint Paul, MN 55104
LE-160	Judy Nelson		11/17/2010	Email	Form Letter 1			54 Helberg Road Esko, MN 55733-9742
LE-161	Andrew Nesheim		11/15/2010	Email	Form Letter 1			694 Green St Apt 4 Cambridge, MA 02139
LE-162	Kimberly Nieman		11/28/2010	Email	Form Letter 1			4550 Orchid Circle Plymouth, MN 55446
LE-163	Michele Nihipali		11/29/2010	Email	Form Letter 1			54-074 A Kam Hwy Hauula, HI 96717
LE-164	Christopher Norbury		11/16/2010	Email	Form Letter 1			2175 Sunflower Lane Owatonna, MN 55060
LE-165	Shaun O'keefe		11/16/2010	Email	Form Letter 1			4305 Columbus Ave Minneapolis, MN 55407
LE-166	Elinor Ogden		11/15/2010	Email	Form Letter 1			1505 Xanthus Lane Plymouth, MN 55447
LE-167	Richard Olson		11/18/2010	Email	Form Letter 1			45 University Ave SE Unit 610 Minneapolis, MN 55414
LE-168	Sanda Oslin		11/24/2010	Email	Form Letter 1			10061 State Highway 27 Sturgeon Lake, MN 55783
LE-169	Candyce Osterkamp		11/16/2010	Email	Form Letter 1			1692 Idaho Ave. E. St. Paul, MN 55106
LE-170	Elanne Palcich		11/29/2010	Email	Unique	13	MPD;OOS;PLN;SOC; SOO;WET	29 SE 5th Street Chisholm, MN 55719
LE-171	Jeff Pierce		11/18/2010	Email	Form Letter 1			5500 Pillsbury Ave S Minneapolis, MN 55419
LE-172	Lelsie Pilgrim		11/15/2010	Email	Form Letter 1			1704 Vicki Lane mendota hts, MN 55118
LE-173	Jan Pohlen		11/16/2010	Email	Form Letter 1			8706 Norway St NW 8706 Norway St NW
LE-174	Angela Powers		11/21/2010	Email	Form Letter 1			127 Nina Street St Paul, MN 55102
LE-175	Unknown		11/28/2010	Email	Unique	1	SOO	
LE-176	Paul Schurke		11/15/2010	Email	Form Letter 1			1101 Ring Rock Road Ely, MN 55731

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-177	Barbara Pumper		11/22/2010	Email	Form Letter 1			27404 Scenic Byway Road Belle Plaine, MN 56011
LE-178	Jeff L. Pykkonen		11/16/2010	Email	Form Letter 1			719 West 6th Street Duluth, MN 55806
LE-179	Jeannie Quillen		11/15/2010	Email	Form Letter 1			36002 Fox Hunter Rd Pequot Lakes, MN 56472
LE-180	Scott Rausch		11/22/2010	Email	Form Letter 1			2211 40th Avenue NE Columbia Heights, MN 55421
LE-181	John Reutter		11/17/2010	Email	Form Letter 1			2951 Trillium Ct E Aurora, IL 60506
LE-182	M Richardson		11/16/2010	Email	Form Letter 1			1138 charles st paul, MN 55104
LE-183	Marlise Riffel		11/28/2010	Email	Unique	6	MRK;SOO	1001 1st Street South Virginia, MN 55792
LE-184	Megan Riley		1/20/2010	Email	Form Letter 1			641 Jefferson Ave St Paul, MN 55102
LE-185	Bridget Riversmith		11/16/2010	Email	Form Letter 1			225 E Anoka St Duluth, MN 55803
LE-186	Angie Robinson		11/15/2010	Email	Form Letter 1			1955 Hythe St. Roseville, MN 55113
LE-187	Edwardo Romero		1/7/2011	Email	Form Letter 1			18549 English Avenue Farmington, MN 55024
LE-188	Arnie Roos		11/16/2010	Email	Form Letter 1			2020 Nicollet Avenue Minneapolis, MN 55404
LE-189	Earl Rosenwinkel		11/24/2010	Email	Form Letter 1			1127 E. 6th Street Duluth, MN 55805
LE-190	Earl Rosenwinkel		12/10/2010	Email	Form Letter 1			1127 E. 6th St. Duluth, MN 55805
LE-191	John Paul Roy Roy		11/15/2010	Email	Form Letter 1			3231 37th Ave. S Minneapolis, MN 55406-2136
LE-192	Juliann Rule		11/16/2010	Email	Form Letter 1			35002 115th Avenue Avon, MN 56310
LE-193	Linda Rulison		11/22/2010	Email	Form Letter 1	1	SOO	
LE-194	Tricia Runningen		11/15/2010	Email	Form Letter 1			9378 County Road 25 Houston, MN 55943
LE-195	Paul Ryals		11/16/2010	Email	Form Letter 1			6529 44th Avenue North Crystal, MN 55428

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-196	Jean Schermer		12/30/2010	Email	Form Letter 1			2803 185th St Luck, WI 54853
LE-197	John Schmitt		11/17/2010	Email	Form Letter 1			5101 Park Avenue Minneapolis, MN 55417
LE-198	Peter Scholtz		11/15/2010	Email	Form Letter 1			3136 10th Ave. S. #3 Minneapolis, MN 55407
LE-199	Richard Schubert		11/23/2010	Email	Form Letter 1			4754 Chicago Bay Road Hovland, MN 55606
LE-200	Steven Schultz		11/29/2010	Email	Form Letter 1			1225 Ingerson Road Arden Hills, MN 55112
LE-201	Susan Schurke		11/15/2010	Email	Form Letter 1			1101 Ring Rock Road Ely, MN 55731
LE-202	Rachel Scott		11/17/2010	Email	Unique	7	MPD;SOO	4206 Lombard Street Duluth, MN 55804
LE-203	Kurt Seaberg		11/17/2010	Email	Form Letter 1			2000 Seabury Av. Minneapolis, MN 55406
LE-204	Lisa Sharp		11/15/2010	Email	Form Letter 1			Dixon Road Brandon, WI 53919
LE-205	Michael Shomsky		11/23/2010	Email	Form Letter 1			3937 20th Ave S Minneapolis, MN 55407
LE-206	John Smith		11/15/2010	Email	Form Letter 1	1	SOO	Hwy 1 Finland, MN 55603
LE-207	Barbara Stamp		11/15/2010	Email	Form Letter 1			6901 W 84th St Bloomington, MN 55438
LE-208	Aleen Starkweather		11/24/2010	Email	Form Letter 1			20 North Eliot Ave., Apt. 32 Rush City, MN 55069
LE-209	Jake Staum		11/29/2010	Email	Form Letter 1			7458 Concerto Curve Fridley, MN 55432
LE-210	Steven Steele		11/16/2010	Email	Form Letter 1			7451 Dallas Ct N Maple Grove, MN 55311
LE-211	Jim Stiles		11/29/2010	Email	Form Letter 1			1903 5th Avenue NW Austin, MN 55912
LE-212	Cheryl Storm		11/22/2010	Email	Form Letter 1			6068 Murphy Lake Road Brimson, MN 55602
LE-213	Gregory Stricherz		11/15/2010	Email	Form Letter 1			5735 Washburn Avenue South Minneapolis, MN 55410

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-214	Zabelle Stodola		11/7/2010	Email	Unique	3	MPD;SOO	2801 S. University Little Rock, AR 72204
LE-215	Mary Suelflow		11/15/2010	Email	Form Letter 1			508 Jewett Street Marshall, MN 56258
LE-216	Melinda Suelflow		11/19/2010	Email	Form Letter 1			5881 Nikolai Road Finland, MN 55603
LE-217	Steve Suelflow		11/29/2010	Email	Form Letter 1			508 Jewett St. Marshall, MN 56258
LE-218	Janice Tarnow		11/19/2010	Email	Form Letter 1			2114 Glenview Ln NE Rochester, MN 55906
LE-219	Danielle Taylor		11/15/2010	Email	Form Letter 1			862 Smith Ave. S. St. Paul, MN 55107
LE-220	Andrew Thiel		11/29/2010	Email	Form Letter 1			1835 Ulysses St NE apt 6 Minneapolis, MN 55418
LE-221	Lynn Thomasberg		11/15/2010	Email	Form Letter 1			3523 Fremont Ave S Minneapolis, MN 55408
LE-222	Rob Thomas		11/17/2010	Email	Form Letter 1			2740 Nelson Rd Delano, MN 55328
LE-223	Cat Thompson		11/23/2010	Email	Form Letter 1			PO Box 7851 St. Paul, MN 55107
LE-224	Marcia Thurmer		11/23/2010	Email	Form Letter 1	1	SOO	29184-396th Place
LE-225	Elizabeth Treher		11/15/2010	Email	Form Letter 1			8639 S Strand Lake Rd Cotton, MN 55724
LE-226	Nadya Trytan		11/15/2010	Email	Form Letter 1			1186 Grand Ave #12 St Paul, MN 55105
LE-227	Matthew Tyler		11/29/2010	Email	Unique	24	CUI;CUM;ECO;FEA; FOR;MRK;NPR;PLN; TES;VWH;WAT;WET	PO Box 511 Finland, MN 55603
LE-228	Andrew and Elizabeth U		11/29/2010	Email	Unique	2	PLN;SOO	1347 Walsh Road Ely, MN 55731
LE-229	Molly Uvaas		11/29/2010	Email	Form Letter 1			901 2nd St. NE #205 Minneapolis, MN 55413
LE-230	Michelle Valadez		12/13/2010	Email	Form Letter 1			8577 Holland Avenue Apple Valley, MN 55124
LE-231	Ordell Vee		11/16/2010	Email	Form Letter 1			427 2nd St NE Madelia, MN 56062



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-232	Jeff Verito		11/19/2010	Email	Form Letter 1			350 1/2 East Ridge Street Marquette, MI 49855
LE-233	Frank Jeff Verito		11/26/2010	Email	Unique	3	NPR	350 1/2 East Ridge Street Marquette, MI 49855
LE-234	Martha Vest		11/15/2010	Email	Form Letter 1			63 Fairview Avenue S. st. Paul, MN 55105
LE-235	John Viacrusis		11/15/2010	Email	Form Letter 1			3002 17rh St. S Apt. 206 Moorhead, MN 56560
LE-236	Pam Videen		11/16/2010	Email	Form Letter 1			13828 Flay Avenue N Hugo, MN 55038
LE-237	Paul Vitko		11/15/2010	Email	Form Letter 1			10587 Wellington Ln N Maple Grove, MN 55369
LE-238	Darren Vogt	1854 Treaty Authority	11/24/2010	Email	Unique	1		4428 Haines Road Duluth, MN 55811
LE-239	Pauline Wahlquist		11/16/2010	Email	Form Letter 1			10979 State Hwy 23 Brook Park, MN 55007-4726
LE-240	Terry Williams		11/15/2010	Email	Form Letter 1			4170 Brigadoon Drive Shoreview, MN 55126-3107
LE-241	Mary Wilm		11/16/2010	Email	Form Letter 1			2919 45th Ave. S. Mpls, MN 55406
LE-242	Charles Wilson		11/24/2010	Email	Form Letter 1			8421 22nd Ave S Bloomington, MN 55425-1819
LE-243	Rob Winnick		11/18/2010	Email	Form Letter 1			3116 West Lake St Apt 423 Minneapolis, MN 55416
LE-244	Warner Wirta		12/12/2010	Email	Form Letter 1			3963 Fiskett Rd Duluth, MN 55803
LE-245	Meredith Wodrich		11/15/2010	Email	Form Letter 1			3236 18th Av S #2 Minneapolis, MN 55407
LE-246	Andrea Wolmutt		11/23/2010	Email	Form Letter 1			1134 Pine Mtn. Lk. Rd. NW Backus, MN 56435
LE-247	Kristen Zehner		11/24/2010	Email	Form Letter 1	1	SOO	118 Blue Spruce Marshall, WI 53559
LE-248	David Zimney		11/15/2010	Email	Form Letter 1			11100 Cedar Hills Blvd Apt124 Minnetonka, MN 55305
LE-249	Darren Vogt	1854 Treaty Authority	11/24/2010	Letter	Unique	8	ALT;CUI;MRK;SOO; VWH	4428 Haines Road

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-250	T.E. Alget		11/23/2010	Letter	Form Letter 2	4	MRK;SOC;SOO	415 Arlington Hoyt Lakes, MN 55750
LE-251	Jonathan Alien		12/1/2010	Letter	Form Letter 1			315 W 15th Street Minneapolis, MN 55403
LE-252	John Seymour-Anderson		12/1/2010	Letter	Form Letter 1			3925 Pleasant Avenue S Minneapolis, MN 55409
LE-253	Aaron Anderson		10/26/2010	Comment F	Unique	2	MRK;PAC	
LE-254	Susan Dowers		11/23/2010	Letter	Form Letter 2	3		310 Viking Drive Hoyt Lakes, MN 55750
LE-255	Sara Barsel		12/1/2010	Letter	Form Letter 1			1276 Eldridge Ave Roseville, MN 55113
LE-256	Bill Brice	Franconia Minerals	12/27/2010	Comment F	Unique	3	MRK;PAC;PLN;SOO	986 Ingerson Shoreview, MN
LE-257	Jessica Buchberger		12/1/2010	Letter	Form Letter 1			718 19th Ave NE Minneapolis, MN 55418
LE-258	Sue Budd		12/1/2010	Letter	Form Letter 1			3021 Zanthon Minneapolis, MN 55416
LE-259	John and Gloria Buetow		11/26/2010	Letter	Unique	1		1564 Ruth Street N St. Paul, MN 55119
LE-260	Mike Schelmeske		12/23/2010	phone call	Unique	4	ALT;MPD;SOO	308 County Road 44 Grand Marais, MN 55604
LE-261	Carolyn Clements		11/18/2010	Email	Form Letter 1			601 Sunset Drive Minnetonka, MN 55305
LE-262	Chuck Dayton		12/1/2010	Letter	Form Letter 1			1660 Coffman St St. Paul, MN 55708
LE-263	Carol O'Donnell		11/23/2010	Letter	Form Letter 2	3		212 Arlington Road Hoyt Lakes, MN 55750
LE-264	Kit Donnelly		11/29/2010	Letter	Form Letter 1			3921 E. 26th Street Minneapolis, MN 55406
LE-265	Michael Dougherty		11/29/2010	Letter	Form Letter 1			1047 Avon Street N St. Paul, MN
LE-266	Janet Draper		11/23/2010	Letter	Unique	4	MRK;PLN;SOO	1825 Dunedin Avenue Duluth, MN 55803
LE-267	B. Elisgbour		11/23/2010	Letter	Form Letter 2	4		234 Suffolk Drive Hoyt Lakes, MN 55750
LE-268	Gregory Elstad	Elstad Enterprises	11/9/2010	Comment F	Unique	3	SOO	2336 Lac La Belle Rd Carlton, MN 55718

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-269	Don Emery		11/2/2010	Comment F	Unique	3	OOS	325 Wilkinson Lane North Oaks, MN 55127
LE-270	Richard Engdahl		11/26/2010	Letter	Form Letter 1			2491 Lake Elmo Ave N Lake Elmo, MN 55042
LE-271	Jonathan Engel		12/1/2010	Letter	Form Letter 1			221 Washburn Ave N Minneapolis, MN 55405
LE-272	Ramona Engelmann		12/1/2010	Letter	Form Letter 1			2307 E. 24th Street Minneapolis, MN 55406
LE-273	Erik Erie		10/26/2010	Comment F	Unique	3	NPR;OOS;SOO	221 Guilford Hoyt Lakes, MN
LE-274	Joel Evers		11/26/2010	Comment F	Unique	1	SOO	502 Partridge Road Hoyt Lakes, MN 55750
LE-275	William Fietzer		12/1/2010	Letter	Form Letter 1			4052 20th Avenue S Minneapolis, MN 55407
LE-276	Hallie Finucane		12/1/2010	Letter	Form Letter 1			2447 Chatsworth St N Roseville, MN 55113
LE-277	Nancy Schuldt	Fond du Lac	11/29/2010	Letter	Unique	10	ALT;CUI;HAZ;LEG;MRK;NPR;PLN;WAT;WET	1720 Big Lake Rd Cloquet, MN 55720
LE-278			11/30/2010	Petition	Unique			
LE-279	Mark Giese		11/26/2010	Letter	Form Letter 1			1520 Bryn Mawr Avenue Racine, WI 53403
LE-280	Esteban Chiriboga		11/15/2010	Letter	Unique	10	ALT;FEA;HAZ;LEG;MPD;MRK;SOC;SOO;WET	PO Box 9 Odanah, WI 54861
LE-281	Keith Goetzman		12/1/2010	Letter	Form Letter 1			248 Thomas Avenue S Minneapolis, MN 55405
LE-282	Paula Maccabee	WaterLegacy	11/29/2010	Letter	Unique	77	AIR;ALT;CCC;CUI;FEA;FOR;GSA;HAZ;LEG;MPD;MRK;PLN;SOO;TES;VWH;WAT;WET	1961 Selby Avenue St. Paul, MN 55104

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-283	Margaret Watkins	Grand Portage Environ	11/29/2010	Letter	Unique	16	ALT;CUI;HAZ;LEG;MRK;SOC;WAT;WET	PO Box 428 Grand Portage, MN 55605
LE-284	Esteban Chiriboga				Unique			GLIFWC Odanah, WI 54861
LE-285	Michael Guthier		11/26/2010	Letter	Form Letter 1			410 Havana Rd Owatonna, MN 55060
LE-286	Rex Hale		11/26/2010	Letter	Form Letter 1			8608 Riverview Lane Minneapolis, MN 55444
LE-287	Erik A. Hansen		11/26/2010	Comment F	Unique	1		4182 Ridge Circle Hermantown, MN 55811
LE-288	Gary Hansen		12/1/2010	Letter	Form Letter 1			10368 Columbus Circle Bloomington, MN 55420
LE-289	Art Hanson		11/26/2010	Letter	Form Letter 1			1815 Briarwood Drive Lansing, MI 48917
LE-290	Jennifer Hardy		11/26/2010	Letter	Form Letter 1			38055 County Road 15 Pine River, MN 56474
LE-291	Kate Hathaway		11/26/2010	Letter	Form Letter 1			2116 Iglehart Avenue St. Paul, MN 55104
LE-292	Harriett Haycock		12/1/2010	Letter	Form Letter 1			4300 W River Parkway Minneapolis, MN 55406
LE-293	Evan Hazard		11/26/2010	Letter	Form Letter 1			3119 Appletree Ct NW Bemidji, MN 56601
LE-294	Lance Hentges		12/1/2010	Letter	Form Letter 1			2944 Tyler St NE Minneapolis, MN 55418
LE-295	Stan Herdina		11/26/2010	Letter	Form Letter 1			78424 320th Street Olivia, MN 56277
LE-296	Michelle Hesterberg		11/26/2010	Letter	Form Letter 1			300 N. College Street Northfield, MN 55057
LE-297	Carol Hoffman		12/1/2010	Letter	Form Letter 1			4300 West River Parkway South #214 Minneapolis, MN 55406
LE-298	Brent and Heather Holm		12/1/2010	Letter	Form Letter 1			15327 Lake Shore Ave Minnetonka, MN 55345
LE-299	Robert Hudnut		11/26/2010	Letter	Form Letter 1			7145 65th Street S Cottage Grove, MN 55016
LE-300	Donald Husband		12/1/2010	Letter	Form Letter 1			149 Grotto Street S St. Paul, MN 55105



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-301	Sam Ilstrup		11/26/2010	Letter	Form Letter 1			12352 175th Street Barrett, MN 56311
LE-302	Kevin Proescholdt	Izaak Walkton League	12/6/2010	Letter	Unique	12	CUI;GSA;MPD;MRK;SOC;SOO;TES;VWH;WAT;WET	1619 Dayton Avenue, Suite 202 St. Paul, MN 55104
LE-303	Sylvia Johanneson		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Minneapolis, MN
LE-304	Matt Johansen		11/26/2010	Letter	Form Letter 1			10355 Greenfield Road Greenfield, MN 55357
LE-305	Maureen Johnson		11/8/2010	Letter	Unique	18	ALT;CUI;CUM;LEG;MPD;MRK;NPR;OOS;SOC;SOO	6763 253rd Avenue NE Stacy, MN 55079
LE-306	Erin Redlin		11/26/2010	Letter	Form Letter 1			2901 30th Avenue NE Minneapolis, MN 55418
LE-307	Loni Kemp		11/26/2010	Letter	Unique	6	GSA;MPD;MRK;SOO;TES;WAT;WET	14083 County 23 Canton, MN 55922
LE-308	Karl Kendall		11/26/2010	Comment F	Unique	1	SOO	4674 County Road 12 Moose Lake, MN 55767
LE-309	Elizabeth Larson		11/26/2010	Letter	Form Letter 1			4 Walden Place Northfield, MN 55057
LE-310	Mark Larson		11/26/2010	Comment F	Unique	2	SOO	420 E. Sheridan Street Ely, MN 55731
LE-311	Ernest Lehmann	Beaver Bay Inc.	11/24/2010	Letter	Unique	7	CUI;LEG;PLN;SOC;SOO;WET	12 South Sixth Street Minneapolis, MN 55402
LE-312	Peter Leschak		10/25/2010	Comment F	Unique	4	CUM;MPD;PLN;SOO	PO Box 51 Side Lake, MN 55781
LE-313	Robert Maki		11/2/2010	Comment F	Unique	1	SOO	313 E. Chapman Street Ely, MN 55731
LE-314	Justin Mattson		10/26/2010	Comment F	Unique	4	SOO	315 South 3rd Street W Aurora, MN 55705
LE-315	Kevin Reuther	MCEA	11/11/2010	Letter	Unique	14	AIR;ALT;CCC;CUM;LEG;MRK;NPR;TES;VWH;WAT;WET	26 East Exchange Street St. Paul, MN 55101

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-316	Eunice Millisata		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Apt 231 Minneapolis, MN 55406
LE-317	Natalie Meyer		12/1/2010	Letter	Form Letter 1			5133 14th Avenue S Minneapolis, MN 55417
LE-318	Carol Mockovak		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Minneapolis, MN 55406
LE-319	Ah-li Monahan		11/26/2010	Letter	Form Letter 1			4314 McLeod St NE Columbia Heights, MN 55421
LE-320	Bjorn Monson		12/1/2010	Letter	Form Letter 1			22 Ludlow Avenue St. Paul, MN 55108
LE-321	Margot Monson		12/1/2010	Letter	Form Letter 1			22 Ludlow Avenue St. Paul, MN 55108
LE-322	Nicole Mount		11/23/2010	Letter	Form Letter 2	3		Hoyt Lakes, MN
LE-323	Paula Maccabee	Multiple NGOs, WaterL	10/18/2010	Letter	Unique	12	CUI;CUM;LEG;MPD; NPR;TES;VWH;WET	WaterLegacy Duluth, MN 55803
LE-324	Daniel Mundt	Mundt & Associates	11/9/2010	Letter	Unique	5	FOR;MPD;NPR;PAC; SOO;VWH;WAT;WE T	2001 Waverly Avenue Duluth, MN 55803
LE-325	Floyd Nelson, et al	City of Hoyt Lakes	11/29/2010	Letter	Form Letter 2	3		Municipal Building Hoyt Lakes, MN 55750
LE-326	Betty Nelson		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Minneapolis, MN 55406
LE-327	Rachel Nelson		12/1/2010	Letter	Form Letter 1	1	SOO	501 12th Avenue Two Harbors, MN 55616
LE-328	Ronald Nelson		12/1/2010	Letter	Form Letter 1			4300 West River Parkway S Minneapolis, MN 55406
LE-329	Ken Norenberg	United Northern Sports	11/29/2010	Comment F	Unique	3	PLN;SOO	114 Pleasant View Rd Duluth, MN 55803
LE-330	Gerald Olsen		11/4/2010	Comment F	Unique	5	MRK;SOO	1621 West County Rd E New Brighton, MN 55112
LE-331	Angeline O'Neill		12/1/2010	Letter	Form Letter 1			4300 W River Parkway #415 Minneapolis, MN 55406

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LE-332	Donna Opp		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Minneapolis, MN 55406
LE-333	J. Peterson		12/1/2010	Letter	Form Letter 1			4300 W River Parkway #437 Minneapolis, MN 55406
LE-334	June Peterson		12/1/2010	Letter	Form Letter 1			4300 West River Parkway South Minneapolis, MN 55406
LE-335	Jean Public	Pewtrusts	10/16/2010	Email	Unique	3	OOS;SOO	8 Winterberry Court Whitehouse Station, NJ 08889
LE-336	Craig Poorker		11/26/2010	Letter	Form Letter 1			3711 York Ave N Robbinsdale, MN 55422-2312
LE-337	Carolyn Porter		12/1/2010	Letter	Form Letter 1			3783 Van Dyke St. White Bear Lake, MN 55110
LE-338	Charles F. Prokop		11/28/2010	Letter	Unique	3	OOS;SOO	5216 141st Street North Hugo, MN 55038
LE-339	Unknown	City of Hoyt Lakes	11/23/2010	Letter	Form Letter 2	3		Unknown Unknown
LE-340	John Reed		11/26/2010	Letter	Unique	4	AIR;CCC;GSA;MPD;MRK;SOO;VWH;WAT	8 Dove Lane North Oaks, MN
LE-341	Jon Rich		10/17/2010	Letter	Unique	6	MPD;OOS;SOO	20891 Arter St NW Anoka, MN 55303
LE-342	Wendy Robertson/Kurt		11/26/2010	Comment F	Unique	7	ALT;CUM;MRK;SOO	1998 Fairbends Road Brimson, MN 55302
LE-343	Mary Black	County County Assesso	11/2/2010	Letter	Unique	2	MRK;SOC;SOO	411 West 2nd St. Grand Marais, MN 56604
LE-344	Jim Sawers		11/23/2010	Letter	Form Letter 2	3		Hoyt Lakes, MN
LE-345	Michael Schelmeslie		12/1/2010	Comment F	Unique	3	ALT;MPD;SOC	308 County Road 44 Grand Marais, MN 55604
LE-346	Dave Schmidt		11/26/2010	Comment F	Unique	3	NPR	5252 West Arrowhead Road Hermantown, MN 55811
LE-347	Joel Schmidt		11/26/2010	Letter	Form Letter 1			12430 County Road 1 NW Pennock, MN 56279

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-348	Lolita M Schnitzius		11/26/2010	Comment F	Unique	3	MPD;SOO	105 South 19th Ave East Ely, MN 55731
LE-349	Jon Schoenrock		12/1/2010	Letter	Form Letter 1			12852 Burwell Drive Minnetonka, MN 55305
LE-350	Karen Schoenrock		12/1/2010	Letter	Form Letter 1			12852 Burwell Drive Minnetonka, MN 55305
LE-351	Sidney Schroeder		11/26/2010	Letter	Form Letter 1			65530 120th Ave Claremont, MN 55924
LE-352	Peg Schwendeman		11/26/2010	Letter	Form Letter 1	5		5035 250th St E Hampton, MN 55031
LE-353	Diadra Decker	Water Legacy Board	10/27/2010	Comment F	Unique	1	NPR	
LE-354	Tammy Seger	City of Hoyt Lakes	11/23/2010	Letter	Form Letter 2	3		
LE-355	Andrew Seliskar		10/26/2010	Comment F	Unique	1	SOO	116 South 15th Ave East Ely, MN 55731
LE-356	Kristin Henry	Sierra Club	11/29/2010	Letter	Unique	21	AIR;ALT;CCC;ECO;G SA;LEG;MPD;MRK;N PR;PLN;TES;WET	85 Second St San Francisco, CA 94105
LE-357	Laurie Sigraito		12/10/2010	Letter	Form Letter 1			4200 29th Ave South Minneapolis, MN 55406
LE-358	David Sims	Hoyt Lakes City Council	11/23/2010	Letter	Form Letter 2	3		
LE-359	Gregory A Solberg		12/1/2010	Letter	Form Letter 1			1645 Millwood Ave West Roseville, MN 55113
LE-360	M. Sorensen		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Apt 276 Minneapolis, MN 55406
LE-361	Curtis Speck	Tecumseh Morgan Farm	11/26/2010	Letter	Form Letter 1			15877 560 Lane Good Thunder, MN 56037
LE-362	Zabelle Stodola	University of Arkansas	11/8/2010	Email	Unique			2801 South University Little Rock, AR 72204
LE-363	Robert Stodola	Gust Lake Property Owners	11/26/2010	Comment F	Unique	4	MPD;SOO	511 Ridgeway Drive Little Rock, AR 72205
LE-364	Dale Stuepfert		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Minneapolis, MN 55406



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-365					Unique			
LE-366	Deeann Stenlund		11/26/2010	Letter	Form Letter 1			2687 Matilda St Roseville, MN 55113
LE-367	Katie Stestlia		12/1/2010	Letter	Form Letter 1			9 Maple Hill Road Hopkins, Mn 55343
LE-368	Voto Sugianto		12/1/2010	Letter	Form Letter 1			4200 29th Ave South Minneapolis, Mn 55406
LE-369	Patricia Swartz		11/26/2010	Comment F	Unique	1		1408 Maple Grove Road Apt 305 Duluth, MN 55811
LE-370	Pat Tammen		12/1/2010	Letter	Form Letter 1			PO Box 398 Soudan, MN 55782
LE-371	Anne Stewart Uehling		10/26/2010	Comment F	Unique	4	MRK;SOC;SOO	1946 Pine Tree Trail Ely, MN 55731
LE-372	Julie Viken		11/28/2010	Email	Unique	3	MPD;SOO	1127 West 4th Street Duluth, Mn 55806
LE-373	Norm Voorhees	Iron Workers Local 512	10/26/2010	Comment F	Unique	3	SOC;SOO	3752 Midway Road Hermantown, MN 55810
LE-374	Elissa Walter		12/1/2010	Letter	Form Letter 1			300 North College Street Northfield, MN 55057
LE-375	Paula Maccabee	Multiple NGOs	10/18/2010	Letter	Unique			
LE-376	Jeffrey Webster		11/26/2010	Letter	Form Letter 1			13020 241st Ave Harmony, MN 55939
LE-377	Rosemary Welch		11/26/2010	Letter	Form Letter 1			6101 Cliff East Road Little Marais, MN 55614
LE-378	Margarite Youngdale		12/1/2010	Letter	Form Letter 1			4300 West River Parkway Apt 373 Minneapolis, MN 55406
LE-379	Susan Zuriff		12/1/2010	Letter	Form Letter 1			4300 West River Parkway #253 Minneapolis, MN 55406
LE-380	Peter Aldrich		11/29/2010	Letter	Form Letter 1			2937 44th Ave S Minneapolis, MN 55406
LE-381	Gary Clements		11/18/2010	Letter	Unique	4	LEG;MPD;MRK;SOO	1362 Lincoln Ave St. Paul, MN 55105
LE-382	James Hartsoe		11/29/2010	Letter	Form Letter 1			4430 Arden View Ct Arden Hills, MN 55112

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-383	L Melcher		12/1/2010	Letter	Form Letter 1			501 12th Avenue Two Harbors, MN 55161
LE-384	Lyle Steinfeldt		11/29/2010	Letter	Form Letter 1			4430 Arden View Ct Arden Hills, MN 55112
LE-385	Peter Aldrich		11/29/2010		Form Letter 1			2937 44th Ave S Minneapolis, MN 55406
LE-386	Gary Clements		11/18/2010		Unique			1362 Lincoln Ave St. Paul, MN 55105
LE-387	James Hartsoe		11/29/2010		Form Letter 1			4430 Arden View Ct Arden Hills, MN 55112
LE-388	L Melcher		12/1/2010		Form Letter 1			501 12th Avenue Two Harbors, MN 55161
LE-389	Lyle Steinfeldt		11/29/2010		Form Letter 1			4430 Arden View Ct Arden Hills, MN 55112
LE-390	Michael Arnold		2/11/2011	Email	Form Letter 1			105 6th Avenue NW Dodge Center, MN 55927
LE-391	Tom Atchison		11/23/2010	Email	Form Letter 1			6711 Lake Shore Dr S Apt 1006 Richfield, MN 55423
LE-392	O. Williams Bruins		11/23/2010	Email	Form Letter 1			1538 11th Avenue NE Rochester, MN 55906-4213
LE-393	David Dixon		11/23/2010	Email	Form Letter 1			2617 Riviera Drive South White Bear Lake, MN 55110
LE-394	Diadra Decker	Water Legacy Board	11/24/2010	Email	Form Letter 1			
LE-395	Molly Woehrlin		11/22/2010	Email	Unique	4	MPD;PLN;SOO	302 Maple Street Northfield, MN 55057
LE-396	Margaret Buresh				Form Letter 3	1	SOO	260 Osceola Ave S Apt 317 Saint Paul, MN 55102-3293
LE-397	Bob Tammen				Unique	2	CUM;GSA;MPD	PO Box 398 Soudan, MN 55782
LE-398	Janet McTavish				Form Letter 3	1	SOO	1764 Wildwood Rd Duluth, MN 55804-9647
LE-399	Carl Schlueter				Form Letter 3	1	SOO	1838 Feronia Ave Saint Paul, MN 55104-3545

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-400	Douglass A. Buell				Unique	4	PAC;SOC;SOO	Hoyt Lakes, MN
LE-401	Barbara Kaufman				Form Letter 3	1	MPD;SOO	1295 32nd St SW Pine River, MN 56474-5027
LE-402	Jack Lewis				Form Letter 3	1	SOO	71 Mid Oaks Ln Roseville, MN 55113-5610
LE-403	Holly Peteron				Form Letter 3	1	SOO	581 Atlantic Hill Dr Saint Paul, MN 55123-2056
LE-404	John & Carol Sayres				Form Letter 3	1	LEG;SOO	23783 Clarissa Haven Dr Henning, MN 56551-9438
LE-405	Steven D. Lere				Unique	5	OOS;SOO	
LE-406	Cindy Cantrell				Unique	3	LEG;MRK	
LE-407	Cindy Cantrell				Unique			
LE-408	Ann Diers				Form Letter 3	5	SOO	4807 Lake Ave White Bear Lake, MN 55110-2848
LE-409	Richard Jacobi				Form Letter 3	1	SOO	861 19th Ave SE Minneapolis, MN 55414-2503
LE-410	David Krings	Whatever Works			Unique	1	SOO	1329 Isleview Road Grand Rapids, MN 55744
LE-411	Nancy Stevenson				Form Letter 3	1	SOO	1331 Forest St Saint Paul, MN 55106-1809
LE-412	Shaun Karakash				Form Letter 3	1	SOO	401 9th Street South Chisholm, MN 55719
LE-413	James Mickelson				Form Letter 3	1	SOO	4817 75th ST SE Rochester, MN 55904
LE-414	Ben Tsai				Form Letter 3	1	SOO	3333 21st Ave S Minneapolis, MN 55407-2411
LE-415	Denise Rokke				Form Letter 3	1	SOO	2009 17 1/2 St NW Rochester, MN 55901-7912
LE-416	Mike Link				Form Letter 3	1	SOO	82119 Bennett Rd Willow River, MN 55795-3079
LE-417	Carlyn Iverson				Form Letter 3	1	SOO	1775 Walnut Ln Eagan, MN 55122-2445
LE-418	Michael Smith				Form Letter 1			6715 N. Table Mt. Road Tuscon, AZ 85718

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-419	Ronald Williams				Form Letter 3	1	SOO	4368 France Ave N Robbinsdale, MN 55422-1565
LE-420	Gretchen Flynn				Unique	3	SOC;SOO;WAT	4300 W River Pkwy #149 Minneapolis, MN 55406
LE-421	Barbara Kratzke				Form Letter 3	1	SOO	264 Oakview Rd Saint Paul, MN 55118-4431
LE-422	Judith Foreman				Form Letter 3	1		8725 Promenade Ln Apt 329 Saint Paul, MN 55125-9621
LE-423	Roxanne Schares				Form Letter 3			170 Good Counsel Dr Mankato, MN 56001-3138
LE-424	Dale F. Johnson				Unique	1	WAT	Shoreview, MN
LE-425	Warren A. Olson				Unique	2	MPD;SOO	1661 Pinehurst Ave. St. Paul, Minnesota 55116
LE-426	Bob Jackson				Unique	5	HAZ;SOO;WET	717-33rd St. Everett, WA 98201
LE-427	Barbara Pilling				Form Letter 3	1	SOO	141 Wheeler St S Saint Paul, MN 55105-1926
LE-428	Kathy Bergan				Form Letter 3	1		105 Dover Ct Jordan, MN 55352-1455
LE-429	Laura Farwell				Form Letter 1			211 North Lakeshore Blvd Marquette, MI 49855
LE-430	Amy Ries				Form Letter 3	1	SOO	11860 Saint Croix Trl North Branch, MN 55056-6729
LE-431	Sherry Phillips				Unique	2	PLN;WAT	2102 Elo Road Brimson, MN 55602
LE-432	Michael Gass				Form Letter 3	1	SOO	2119 7th Ave S Saint Cloud, MN 56301-5842
LE-433	Anne Stewart Uehling				Form Letter 3	2	AIR;ALT	1946 Pine Tree Trail Ely, MN 55731
LE-434	Carol Schaaf				Form Letter 3	1	SOO	312 E Alcott Ave Fergus Falls, MN 56537-2907
LE-435	Terri & Kent Ross				Form Letter 3	1	SOO	5545 Cannon Lake Trl Faribault, MN 55021-8525
LE-436	Ben Davis				Form Letter 3	1	SOO	3514 Riviera Rd Sartell, MN 56377-9761



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-437	Rachel Arata				Form Letter 3	1	SOO	1122 University Ave SE Minneapolis, MN 55455-0241
LE-438	Trudi La Rose				Form Letter 3	1	SOO	8009 Idaho Cir N Brooklyn Park, MN 55445-2618
LE-439	Wayne Passow				Form Letter 3	1	SOO	4242 Xerxes Ave N Minneapolis, MN 55412-1534
LE-440	Elinor Ogden				Form Letter 1			1505 Xanthus Lane Plymouth, MN 55447
LE-441	Ronald Roed				Form Letter 3	1	SOO	564 Montcalm Pl Saint Paul, MN 55116-1730
LE-442	Robert Johnson				Form Letter 3	1	SOO	120 N 42nd Ave E Duluth, MN 55804-2126
LE-443	Rosita Aranita				Form Letter 3	1	SOO	1440 Randolph Ave Apt 305 Saint Paul, MN 55105-2561
LE-444	Kristi Kowal				Form Letter 3	1	SOO	6955 Pioneer Trl Loretto, MN 55357-9627
LE-445	Nancy & Donald Oestrei				Form Letter 3	1	SOO	2230 Viking Dr Saint Cloud, MN 56301-5823
LE-446	Bruce Reno				Form Letter 3	1	MPD;SOO	2851 Tuxedo Blvd Mound, MN 55364-9158
LE-447	Dorie Reisenweber				Unique			111 Garden St Duluth, MN 55812-1142
LE-448	Dorie Reisenweber				Unique	4	HAZ;NPR;SOO;WAT	111 Garden St Duluth, MN 55812-1142
LE-449	Carl Sack				Unique	4	MRK;NPR;PAC;PLN;SOO	1311 W 1st St. Duluth, MN 55806
LE-450	DAVID REISENWEBE				Unique	1	SOO;WAT	111 Garden St Duluth, MN 55812-1142
LE-451	Jonathan Engel				Form Letter 1			221 Washburn Ave N Minneapolis, MN 55405
LE-452	Randy Neprash				Unique	14	ALT;FOR;GSA;LEG;MPD;MRK;PLN;SOO;VWH;WET	

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-453	Randy Neprash				Unique			
LE-454	Russell And Cynthia Ho				Unique			2151 Folwell Ave. Falcon Heights, MN 55108
LE-455	Kris Wegerson				Unique	2	MRK;WET	3726 E 3rd St. Duluth, MN 55804
LE-456	Dennis Szymialis				Unique	11	LEG;MRK;PLN;SOC;SOO	
LE-457	Jane Koschak	River Point Resort & O			Form Letter 3	18	ALT;CUM;FOR;LEG;MPD;MRK;SOC;SOO;WAT;WET	PO Box 397 Ely, MN 55731
LE-458	Kevin Viken				Unique	2	MRK	1127 West 4th St. Duluth, MN 55806
LE-459	Zachary Johns				Form Letter 3	1	SOO	7 Southview Dr Apt 7F Hibbing, MN 55746-3323
LE-460	Elizabeth LePlatt				Form Letter 3	1	WAT	7012 Cheyenne Trl Chanhassen, MN 55317-9504
LE-461	Shirley Humphrey				Form Letter 3	1	SOO	7251 Kurvers Point Rd Chanhassen, MN 55317-7519
LE-462	Frank Ongaro				Unique	6	CUI;MRK;PAC;PLN;SOO;WET	
LE-463	Frank Ongaro				Unique			
LE-464	nancy g				Form Letter 1			1471 Edmund Ave Saint Paul, MN 55104
LE-465	Tod Rubin				Unique	6	MRK;NPR;PLN;SOO	Box 6046 San Ramon, CA 94583
LE-466	Dan Marich				Unique	3	MRK;PAC;SOC;SOO	3902 West 7th Avenue Hibbing, Hibbing, Mn. 55746
LE-467	Dan Marich				Unique			3902 West 7th Avenue Hibbing, Hibbing, Mn. 55746

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-468	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-469	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-470	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-471	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-472	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-473	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-474	Lorie Skudstad	Minnesota Power			Unique			30 West Superior Street Duluth, MN 55802
LE-475	Lorie Skudstad	Minnesota Power			Unique	3	SOC;SOO	30 West Superior Street Duluth, MN 55802
LE-476	Lorie Skudstad	Minnesota Power			Unique			30 West Superior Street Duluth, MN 55802
LE-477	Ben Hinz				Unique	1	MPD;SOO	
LE-478	Linda Morris				Unique			3229 Colorado Ave S St. Louis Park, MN 55416
LE-479	Eric Viken				Unique	3	MRK;SOO	459 Kenilworth Ave. Duluth, MN 55803
LE-480	William Dustin				Unique			7171 Mid Oaks Ave Stillwater, MN 55082
LE-481	Paula Maccabee	WaterLegacy			Unique			1961 Selby Avenue St. Paul, MN 55104
LE-482	LeRoger Lind	Save Lake Superior Ass			Unique	7	MPD;MRK;SOO;WAT	2948 E Castle Danger Rd Two Harbors, MN 55616
LE-483	LeRoger Lind	Save Lake Superior Ass			Unique			2948 E Castle Danger Rd Two Harbors, MN 55616
LE-484	Julie Viken				Unique	2	MRK	1127 West 4th Street Duluth, Mn 55806
LE-485	JoAnn M. Olson				Unique	11	SOC;SOO;VWH;WAT	7329 25th St. N. Oakdale, MN 55128

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-486	Peter Dziuk				Unique	11	MPD;MRK;PLN;SOO	1590 Long Lake Road New Brighton, MN 55112
LE-487	Peter Dziuk				Unique			1590 Long Lake Road New Brighton, MN 55112
LE-488	Elanne Palcich				Unique			29 SE 5th Street Chisholm, MN 55719
LE-489	Stanley Bozarth				Form Letter 3	1	SOO	1310 Legacy Ln Wilmington, NC 28411-9276
LE-490	Betsy Schaefer				Form Letter 3	1	MPD	811 W 24th St Minneapolis, MN 55405-2903
LE-491	Amy Kireta				Form Letter 1			215 W. Chapman St Ely, MN 55731
LE-492	Claudia Ripley				Form Letter 3	1	SOO	1319 Wilderness Curv Eagan, MN 55123-2815
LE-493	Elizabeth Stites				Form Letter 3	1	SOO	5088 Wild Canyon Dr Woodbury, MN 55129-9027
LE-494	Nicole Gallagher				Form Letter 3	1	MPD;WET	5324 45th Ave S Minneapolis, MN 55417-2302
LE-495	Mary Mahowald				Form Letter 3	1	SOO	1501 8th St SW Apt 7 Willmar, MN 56201-4075
LE-496	Jeff Wiles				Form Letter 3	1	NPR	1811 121st Ln NW Apt 405 Minneapolis, MN 55448-7573
LE-497	George Johnson				Form Letter 3	1	SOO	3070 Lake Elmo Ave N Lake Elmo, MN 55042-9469
LE-498	Daniel Shaw				Form Letter 3	1	GSA	5101 Emerson Ave S Minneapolis, MN 55419-1155
LE-499	Lois Norrgard				Form Letter 3	4	CCC;LEG;VWH;WET	10368 Columbus Cir Bloomington, MN 55420-5423
LE-500	Kristin Henry	Sierra Club			Unique			85 Second St San Francisco, CA 94105
LE-501	Kristin Henry	Sierra Club			Unique			85 Second St San Francisco, CA 94105
LE-502	Emily Clarke				Form Letter 3	1	SOO	216 N Bruce St Ivanhoe, MN 56142-9789
LE-503	Janet Asanchev				Form Letter 1			1378 Como Blvd. East St. Paul, MN 55117



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-504	James More				Form Letter 3	1	SOO	PO Box 362 Morris, IL 60450-0362
LE-505	Daniel Westholm				Unique	2	ALT;MRK	4402 Tioga St Duluth, MN 55804
LE-506	Jeff Kitterman				Form Letter 3	1	SOO	11623 Adobe Tr Sauk Centre, MN 56378
LE-507	Tom Canning				Form Letter 3	2	SOO	511 17th St N Moorhead, MN 56560-2356
LE-508	Sean Skibbie				Form Letter 3	1	SOC;SOO	1818 Newton Ave N Minneapolis, MN 55411-3029
LE-509	Margaret Watkins	Grand Portage Environ			Unique			PO Box 428 Grand Portage, MN 55605
LE-510	Margaret Watkins	Grand Portage Environ			Unique			PO Box 428 Grand Portage, MN 55605
LE-511	Nancy Schuldt	Fond du Lac			Unique			1720 Big Lake Rd Cloquet, MN 55720
LE-512	John Dyer				Form Letter 3	1	SOO	1601 Pennsylvania Ave S St Louis Park, MN 55426-2040
LE-513	Hugh Curtler Iii				Form Letter 3	1	SOO	4516 89th Cres N Brooklyn Park, MN 55443-3936
LE-514	Karl Zemlin				Form Letter 3	1	SOO	150 Rolling Hills Dr Carmel, IN 46032-1253
LE-515	mike hipp				Form Letter 3	4		12820 19th Ave SW Pillager, MN 56473-2250
LE-516	Meghan Luke				Form Letter 3	4	CUM;FOR;LEG;TES; WET	5810 Bryant Ave S Minneapolis, MN 55419-2102
LE-517	Michael Maleska				Form Letter 3			12761 Smith Rd Hibbing, MN 55746-8525
LE-518	Kurt Petersen				Form Letter 3			1004 Spring Lake Rd Cloquet, MN 55720-2602
LE-519	Michaels Kathleen				Form Letter 3			6908 76th Ave N Apt 301 Brooklyn Park, MN 55428-1340
LE-520	Christeen Stone				Form Letter 3			2727 Hazelwood St Saint Paul, MN 55109-1158

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-521	Danny Nichols				Form Letter 3			2427 Sunset Ct Little Canada, MN 55117-1676
LE-522	Betsey Porter				Form Letter 3			10040 Penn Ave S Apt 11 Bloomington, MN 55431-2926
LE-523	George Knotek				Form Letter 3			5419 Kensington Pl N Seattle, WA 98103-6227
LE-524	Nanciann Kruse				Form Letter 3			2547 37th Ave S Minneapolis, MN 55406-1745
LE-525	Nate Scheibe				Form Letter 3			224 3rd St W Wabasha, MN 55981-1204
LE-526	Nanciann Kruse				Form Letter 3			2547 37th Ave S Minneapolis, MN 55406-1745
LE-527	Bruce Thornton				Form Letter 3			32162 County Road 1 Saint Cloud, MN 56303-9534
LE-528	Kayla Benson				Form Letter 3			4501 Park Glen Rd St Louis Park, MN 55416-5829
LE-529	Allen Skogquist				Form Letter 3			9491 Inverness Ln NW Ramsey, MN 55303-8023
LE-530	Al Gedicks				Form Letter 3			210 Avon St Apt 4 La Crosse, WI 54603-3096
LE-531	Jerald Dosch				Form Letter 3			40 Alice Ct Saint Paul, MN 55107-2634
LE-532	John Patrick				Form Letter 3			822 9th Ave W Ashland, WI 54806-2812
LE-533	Eunice Hafemeister				Form Letter 3			3845 17th Ave S Minneapolis, MN 55407-2830
LE-534	Barbara Janssen				Form Letter 3			7356 Quantico Ln N Maple Grove, MN 55311-2649
LE-535	Donna Olsen				Form Letter 3			575 Stinson Blvd Apt B12 New Brighton, MN 55112-2540
LE-536	Katharine Carroll				Form Letter 3			1100 Hallam Ave N Mahtomedi, MN 55115-1570
LE-537	Jane Jefferson				Form Letter 3			3840 Grand Ave S Apt 3 Minneapolis, MN 55409-1252

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-538	Karalyn Indrelie				Form Letter 3			514 Salem Ct Mahtomedi, MN 55115-1483
LE-539	Sherry Boulton				Form Letter 3			4933 Nokomis Ave Minneapolis, MN 55417-1435
LE-540	Matthew Schaut				Form Letter 3			3720 27th Ave S Minneapolis, MN 55406-2512
LE-541	Mary Salisbury				Form Letter 3			418 N 8th Ave E Duluth, MN 55805-2031
LE-542	Rachel Scott				Form Letter 1			4206 Lombard Street Duluth, MN 55804
LE-543					Unique			
LE-544	Leslie Prah				Form Letter 3	1	MPD;SOO	1571 Mary St N Maplewood, MN 55119-7144
LE-545	Patricia Olson				Form Letter 3	1	SOO	1117 Weeks Ave Superior, WI 54880-1841
LE-546	Erik Peterson-Nafziger				Form Letter 3	1	SOO	1386 Saint Clair Ave Saint Paul, MN 55105-2335
LE-547	Phyl Morello				Form Letter 3	1	SOO	984 Harrison Ferry Rd White Pine, TN 37890-4903
LE-548	Shaun Gosse				Form Letter 3	1	SOO	451 Fairview Ave N Saint Paul, MN 55104-3563
LE-549	Brian Grivna				Form Letter 3	1	SOO	6017 Concord Ave Minneapolis, MN 55424-1733
LE-550	Marcy Leussler				Form Letter 3	1	SOO	4456 5th Ave S Minneapolis, MN 55419-5124
LE-551	Wendy Robertson				Form Letter 3	1	MPD	1998 Fairbanks Rd Brimson, MN 55602
LE-552	Jan Reineck				Form Letter 3	1	SOO	3531 Russell Ave N Minneapolis, MN 55412-2239
LE-553	Janet Magree				Form Letter 3	1	SOO	1925 E 8th St Duluth, MN 55812-1312
LE-554	Wanda Ballentine				Form Letter 1			1200 Town Centre Eagan, MN 55123
LE-555	Sara Barsel				Form Letter 3	5	ALT;CUM;LEG;MRK	1276 Eldridge Ave Roseville, MN 55113
LE-556	Deborah Huskins				Form Letter 3	2	SOO	2624 Windsor Ln Woodbury, MN 55125-2792

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-557	Jacob Krause				Form Letter 3	1	SOO	2550 Johnson St NE Minneapolis, MN 55418-3941
LE-558	Mary McGilligan				Form Letter 3	1	SOO	814 5th Ave Two Harbors, MN 55616-1429
LE-559	Julia Bohnen				Form Letter 3	2	MPD;SOO	8881 Irving Ave S Bloomington, MN 55431-2056
LE-560	Helen Duritsa				Form Letter 3	1	SOO	4675 Lake Ave White Bear Lake, MN 55110-3228
LE-561	Bill Robertson				Form Letter 3	1	SOO	3676 Inverary Dr Columbus, OH 43228-9436
LE-562	Rose Tondra				Form Letter 3	1	MPD	122 S Riverside Dr Ames, IA 50010-5962
LE-563	Rose Tondra				Form Letter 3			122 S Riverside Dr Ames, IA 50010-5962
LE-564	Amanda Meyer				Form Letter 3	3	MPD;SOO	5133 14th Ave S Minneapolis, MN 55417-1801
LE-565	Marc Fink	Center for Biological Di			Unique			209 East 7th St. Duluth, MN 55805
LE-566	Marc Fink	Center for Biological Di			Unique	25	ALT;CUM;GSA;LEG;MRK;NPR;PLN;SOO;TES	209 East 7th St. Duluth, MN 55805
LE-567	Marc Fink	Center for Biological Di			Unique			209 East 7th St. Duluth, MN 55805
LE-568	Steffen Demeter				Form Letter 3	1	SOO	420 City View Dr Minnetonka, MN 55305-1226
LE-569	Marina Herzog				Form Letter 3	1	SOO	39350 Naples St NE Stanchfield, MN 55080-5041
LE-570	Marina Herzog				Form Letter 3			39350 Naples St NE Stanchfield, MN 55080-5041
LE-571	Andrew and Elizabeth U				Unique			1347 Walsh Road Ely, MN 55731
LE-572	Margot Monson				Unique			22 Ludlow Avenue St. Paul, MN 55108
LE-573	Margot Monson				Unique			22 Ludlow Avenue St. Paul, MN 55108
LE-574	Avangelina Tamis McK				Unique	11	MPD;MRK;PLN;SOO	



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-575	Jan Karon				Unique	3	MPD;SOO	
LE-576	Kristin Larsen	Friends Cloquet Val. Fo			Unique			
LE-577	Kristin Larsen	Friends Cloquet Val. Fo			Unique			
LE-578	Kristin Larsen	Friends Cloquet Val. Fo			Unique			
LE-579	Jeff Schultz				Form Letter 3			730 Stinson Blvd Unit 112 Minneapolis, MN 55413-2974
LE-580	Jedidiah Krauss				Form Letter 1			1014 Sunnyview Ln Minnetonka, MN 55305
LE-581	Steve Koschak				Unique	13	CUM;GSA;MPD;MRK;PLN;SOO;TES;WET	PO Box 397 Ely, MN 55731
LE-582	Matthew Tyler				Unique			PO Box 511 Finland, MN 55603
LE-583	Matthew Tyler				Unique			PO Box 511 Finland, MN 55603
LE-584	Scott Pelarski				Form Letter 3	1	SOO	901 E Old Shakopee Rd Bloomington, MN 55420-4551
LE-585	Bradley Sagen	Northeastern Minnesota			Unique	14	ALT;CUI;CUM;GSA;LEG;MRK;NPR;PLN;SOO;TES;VWH;WAT;WET	P.O. Box 625 Ely, MN 55731
LE-586	Bradley Sagen	Northeastern Minnesota			Unique			P.O. Box 625 Ely, MN 55731
LE-587	Alan Muller	Green Delaware			Unique	7	CUI;GSA;MPD;PLN;SOO;WAT	Box 69, One Stewart Street Port Penn, DE, 19731
LE-588	Alan Muller	Green Delaware			Unique			Box 69, One Stewart Street Port Penn, DE, 19731
LE-589	Melanie PetersonNafzig				Form Letter 3	1	SOO	1386 Saint Clair Ave Saint Paul, MN 55105-2335

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-590	Richard Watson	Lutefisk Technologies, I			Unique	10	MPD;MRK;SOO	114 E. Boundary St. Ely, MN 55731
LE-591	John Waterbury				Unique	3	MPD;MRK;SOC	
LE-592	Jessica Koski				Form Letter 3	1	CUI	14403 Lindemann Rd Baraga, MI 49908-9068
LE-593	Mike Kemper				Form Letter 3	1	SOO	8187 Johansen Ave S Cottage Grove, MN 55016-4922
LE-594	Jeff Kopp				Unique	1	SOO	
LE-595	Dale Tranter				Unique	5	MPD;SOC;SOO;WAT	12 Red Fox Road St. Paul, Minnesota 55127
LE-596	D Crocker				Form Letter 3	1	SOO	3012 Darling Dr NW Alexandria, MN 56308-8656
LE-597	D Crocker				Form Letter 3			3012 Darling Dr NW Alexandria, MN 56308-8656
LE-598	Karen Updegraff				Unique	5	GSA;PLN;SOO;WAT	1391 Hiironen Rd Brimson, MN 55602
LE-599					Unique			
LE-600					Unique			
LE-601					Unique			
LE-602	Frank Jeff Verito				Unique	6	ALT;NPR;SOO	350 1/2 East Ridge Street Marquette, MI 49855
LE-603	Frank Jeff Verito				Unique			350 1/2 East Ridge Street Marquette, MI 49855
LE-604	Warner Wirta				Unique	1	OOS	3963 Fiskett Rd Duluth, MN 55803
LE-605	Todd Wilson				Unique	2	GSA;SOO	Minneapolis, MN
LE-606	Cynthia Miller				Unique	1	SOO	2915 W 15th St. Duluth, MN 55804
LE-607	Janice Greenfield				Form Letter 1			1793 Rome Ave Saint Paul, MN 55116

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-608	Cheryl Dannenbring				Unique	3	MPD;SOO	1850 Vermilion Rd. Duluth, MN 55803
LE-609	Joshua Tropp				Unique	1	OOS	759 Pierce St NE Minneapolis, MN 55413
LE-610	Cheryl Dannenbring				Unique	4	MPD;SOO;TES	1850 Vermilion Rd. Duluth, MN 55803
LE-611	Linda Glaser				Unique	3	MPD;SOO	4215 Luverne Street Duluth, MN 55804
LE-612	William Andersen				Unique	1	PLN	2732 N 22nd Ave West Duluth, MN 55811
LE-613	Lisa Sander				Form Letter 1	1	SOO	6286 copperline rd
LE-614	Charlotte Hope Herold				Unique	1	SOO	
LE-615	LeRoy DeFoe	FDL THPO			Unique	4	CUI;MPD;SOO	
LE-616	Christine Frank				Unique	1	OOS	115 2nd Ave S #714 Minneapolis, MN 55401
LE-617	Andrea Gelb				Unique	3	MPD;SOO	1220 E 7th St Duluth, MN 55805
LE-618	Molly Woehrlin				Unique			302 Maple Street Northfield, MN 55057
LE-619	Steven Garske				Unique	6	LEG;SOO;VWH;WAT ;WET	PO Box 4 Marenisco, MI 49947
LE-620	Marlene Pospeck	Mayor of Hoyt Lakes			Unique			Hoyt Lakes, MN
LE-621	Marlene Pospeck	Mayor of Hoyt Lakes			Unique	2	MRK;SOO	Hoyt Lakes, MN
LE-622	Marlene Pospeck	Mayor of Hoyt Lakes			Unique			Hoyt Lakes, MN
LE-623	Betty Meados				Form Letter 3	1	SOO	PO Box 102 12973 Sturgeon Rd
LE-624	Carol Neumann				Form Letter 3	2	SOO	694 Oakdale Ave Saint Paul, MN 55107-3024
LE-625	Paul and Susan Schurke	Wintergreen Dogsled L			Unique	2	MPD;SOO;WAT	Ely, Minnesota

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-626	G Benjamin Hocker				Form Letter 3	1	MPD	5730 Covington Cir Minnetonka, MN 55345-5040
LE-627	Betsy Daub	Friends of the Boundary			Unique	60	AIR;ALT;CCC;CUI;CUM;ECO;FEA;LEG;MPD;MRK;PLN;SOC;TES;VWH;WAT;WET	401 N. Third Street Minneapolis, MN 55401
LE-628	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-629	Christopher Krupp	Western Lands Project			Unique	6	ALT;MRK;NPR;PLN	P.O. Box 95545 Seattle, WA 98145-2545
LE-630	Christopher Krupp	Western Lands Project			Unique			P.O. Box 95545 Seattle, WA 98145-2545
LE-631	Betsy Daub	Friends of the Boundary			Unique			401 N. Third Street Minneapolis, MN 55401
LE-632	Brian Pietsch				Form Letter 3	1	SOO	18320 5th Ave N Plymouth, MN 55447-3310
LE-633	Kate Seitz				Form Letter 3	1	SOO	1115 Gordon Ave Maplewood, MN 55109-4243
LE-634	Carol Figeroid-Burgi				Form Letter 3	1	SOO	1425 Wellesley Ave Saint Paul, MN 55105-2420
LE-635	Kristen Zehner				Form Letter 1			118 Blue Spruce Marshall, WI 53559
LE-636	Amy Kleine				Form Letter 3			1406 4th Ave N Sauk Rapids, MN 56379-2703
LE-637	Joshua Houdek				Form Letter 3	1	SOO	2820 37th Ave S Minneapolis, MN 55406-1718
LE-638	Unknown				Unique	3	SOO;WAT	
LE-639	Carol Berg				Form Letter 3	1	SOO	6910 Chaparral Ln Chanhassen, MN 55317-9226
LE-640	Michelle Gobely				Form Letter 3	1	SOO	1581 Wheelock Ln Apt 202 Saint Paul, MN 55117-5965
LE-641	Beth Robelia				Form Letter 3	1	SOO	1496 Arona St Saint Paul, MN 55108-2333



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-642	Rob Davis				Form Letter 3	2	SOO	4127 Colorado Ave S Saint Louis Park, MN 55416-3135
LE-643	Judy Johnson				Unique			2566 Ellis Ave Apt 115 Saint Paul, MN 55114-1446
LE-644	Betty Meados				Form Letter 3	2	MPD;SOO	PO Box 102 12973 Sturgeon Rd
LE-645	Bruce Truckey				Form Letter 3	1	SOO	PO Box 444 Duluth, MN 55801-0444
LE-646	David Moffatt				Form Letter 3	1	SOO	8523 Raintree Dr Apt 4G Mountain Iron, MN 55768-9641
LE-647	Linda Kofstad				Form Letter 3	2	CUM;SOC	68540 300th St Hartland, MN 56042-4081
LE-648	Siri Simons				Form Letter 3	1	SOO	7024 Tartan Curv Eden Prairie, MN 55346-3362
LE-649	Jean Public	Pewtrusts			Unique			8 Winterberry Court Whitehouse Station, NJ 08889
LE-650	Jill & Jeff Boogren				Form Letter 3	1	SOO	2925 E Minnehaha Pkwy Minneapolis, MN 55417-1315
LE-651	Joshua Houdek				Form Letter 3	1	SOO	2820 37th Ave S Minneapolis, MN 55406-1718
LE-652	David Miller				Form Letter 3	1	SOO;WAT	3850 21st Ave S Minneapolis, MN 55407-3068
LE-653	Kyle Haight-Nali				Form Letter 3	1	SOO	2327 E Franklin Ave Minneapolis, MN 55406-1795
LE-654	Chip Borkenhagen				Form Letter 3	1	SOO	201 West Laurel Street Brainerd, MN 56401
LE-655	Sandy Dvorsky				Form Letter 3	1	SOO	433 Mary St S Maplewood, MN 55119-5534
LE-656	Shirley Huskins				Form Letter 3	1	SOO	1841 Eagle Ridge Dr Mendota Heights, MN 55118-4208
LE-657	Bonnie Meyer				Form Letter 3	1	SOO	14214 60th St Princeton, MN 55371-6701
LE-658	Karen Mazza				Form Letter 3	1	SOO	1688 York Ave Saint Paul, MN 55106-3637

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-659	Ivan Zenker				Form Letter 3	1	SOO	7135 Thames Rd Woodbury, MN 55125-3823
LE-660	Jacqueline Bartosh				Unique	1	SOO	
LE-661	Christopher Ahalt				Form Letter 3	1	SOO	4021 42nd Ave S Minneapolis, MN 55406-3528
LE-662	Debra Greenblatt				Form Letter 3	1	MPD	2705 Drew Ave S Minneapolis, MN 55416-4207
LE-663	herbert davis				Form Letter 3	2	SOO	12474 County 100 Sauk Centre, MN 56378-4760
LE-664	Mikanuk "Larry D. Ada				Form Letter 3	1	SOO	3149 36th Ave S Minneapolis, MN 55406-2126
LE-665	Paul Greenblatt				Form Letter 3	1	MPD;SOO	2705 Drew Ave S Minneapolis, MN 55416-4207
LE-666	Shawn Hubert				Form Letter 3	1	SOO	1904 Oxford St N Roseville, MN 55113-6523
LE-667	Mary Marcan				Form Letter 3	2	SOO	1001 14th St NW Rochester, MN 55901-2590
LE-668	Kelli Cool				Form Letter 3	1	SOO	11220 Terrace Rd NE Blaine, MN 55434-1777
LE-669	Chrissy Marty				Form Letter 3	1	SOO	8475 Cooper Way Inver Grove Heights, MN 55076-3349
LE-670	Glenn Cool				Form Letter 3	1	SOO	11220 Terrace Rd NE Blaine, MN 55434-1777
LE-671	Steve Vincent	Northland Securities, In			Unique	3	SOC;SOO	45 South 7th Street Minneapolis, MN55402
LE-672	Alan Olander				Form Letter 3	1	SOO	25998 277th Ave Nevis, MN 56467-4107
LE-673	Sandra Rathjen				Form Letter 3	2	SOO	104 Farnham Ct Garner, NC 27529-4657
LE-674	Jerry Schedin				Form Letter 3	3	SOO	16642 Ward Lake Dr NW Andover, MN 55304-2103
LE-675	Kristin Tuenge				Form Letter 3	1	SOO	20595 Quinnell Ave N Scandia, MN 55073-9714
LE-676	Bennett Siems				Form Letter 3	1	SOO	3532 Aldrich Ave S # 2 Minneapolis, MN 55408-4148

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-677	David Hohle				Form Letter 3	1	SOC	127 10th Ave S South St Paul, MN 55075-2215
LE-678	Ruthann Yaeger				Form Letter 3	1	SOO	4446 13th Ave NW Rochester, MN 55901-0448
LE-679	Karen Kinnard				Form Letter 3	2	SOO	14337 Fairway Dr Eden Prairie, MN 55344-1956
LE-680	Barb Bower				Form Letter 3	1	SOO	8053 40th Ave Brainerd, MN 56401-1740
LE-681	Patricia Holmes				Form Letter 3	2	MPD;SOO;WAT	1635 Garden Ave Falcon Heights, MN 55113-5732
LE-682	Robin Vora				Unique	6	CUM;FOR;LEG;MRK ;SOO;VWH	1679 NE Daphne Dr. Bend, OR 97701
LE-683	Ann Eastham				Form Letter 3	1	GSA	3712 36th Ave S Minneapolis, MN 55406-2756
LE-684	Charles Ellis				Form Letter 3	1	SOC	3122 153rd Ave NW Andover, MN 55304-3058
LE-685	Lyn Clark Pegg				Form Letter 3	1	SOC;SOO	1335 Minnesota Ave # AVED
LE-686	Debra Hoffman				Form Letter 3	1	SOO	16208 Baywood Ln Eden Prairie, MN 55346-2412
LE-687	Marian Severt				Form Letter 3	1	NPR	11465 Easy St Brainerd, MN 56401-5835
LE-688	Gael Zembal				Form Letter 3	1	SOO	1800 Larpenteur Ave W Apt 12
LE-689	Jeff Hazen				Form Letter 3	2	SOC;SOO	9325 Nesbitt Rd Bloomington, MN 55437-1916
LE-690	Tom Donaghy				Form Letter 3	1	SOO	63 Avon St S Apt 33 Saint Paul, MN 55105-3336
LE-691	Christina Harrison				Form Letter 3	1	SOO	1812 15th Ave S Minneapolis, MN 55404-2119
LE-692	Pat Owen				Unique	2	MPD;SOO	1240 Churchill St. St. Paul, MN 55103
LE-693	Dyke Van Etten William				Unique	1	SOO	3725 Parkway Deephaven, MN 55391
LE-694	Bill Higgins				Unique	1	SOO	901 South 8th Street Virginia, MN 55792

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-695	Pat Hippert				Form Letter 3	1	SOO	512 8th Ave S Saint James, MN 56081-1921
LE-696	Ben Hinz				Unique	1	SOO	
LE-697	Janie Huhta				Form Letter 3	1	SOO	2251 Holm Rd Cromwell, MN 55726-8035
LE-698	Daniel Vincent				Form Letter 3	1	MPD;SOO	2016 Aldrich Ave S Apt 4 Minneapolis, MN 55405-3057
LE-699	Barry W. Tungseth				Unique	4	HAZ;SOC;SOO	13898 Romberg Shores Ely, Minnesota 55731
LE-700	Alan Nikolai				Unique	1	SOO	Chanhassen, MN
LE-701	Cathy Geist				Form Letter 3	1	SOO	3428 34th Ave S Minneapolis, MN 55406-2731
LE-702	Susan Imker				Form Letter 3	1	SOO	309 Elizabeth St W Isanti, MN 55040-7201
LE-703	Jean Evens				Form Letter 3			3192 Town Road 207 International Falls, MN 56649-9022
LE-704	John Roth				Unique	9	CUM;MPD;MRK;PLN ;SOO	4027 Zenith Avenue South Minneapolis, MN 55410
LE-705	Erik Jensen				Form Letter 1			4345 11th Ave. S Minneapolis, MN 55407
LE-706	Julie Champlin				Form Letter 1			1711 1st Ave SE Austin, MN 55912
LE-707	Deborah Crocker				Form Letter 1			3012 Darling Dr. Alexandria, MN 56308
LE-708	Barb Knoth				Form Letter 1			1514 Albany Ave St Paul, MN 55108
LE-709	Mary Moriarty				Form Letter 1			3885 Niagara Ln N Plymouth, MN 55446
LE-710	Andrew Bell				Form Letter 1			217 Washburn Av N. Minneapolis, MN 55405
LE-711	Sincerely,				Form Letter 1			Joseph MerzJoseph Merz 111 W. Lincoln Ave., #305



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-712	Martha Krikava				Form Letter 1			9696 101st St N. Stillwater, MN 55082
LE-713	Chip Borkenhagen				Form Letter 1			201 West Laurel Street Brainerd, MN 56401
LE-714	Angie Robinson				Form Letter 1			1955 Hythe St. Roseville, MN 55113
LE-715	Daniel Messinger				Form Letter 1			5761 SW 47th St Miami, FL 33155
LE-716	Madelynn Frazier				Form Letter 1			1826 East Woodbine Street Springfield, MO 65803
LE-717	Mary Smith				Form Letter 1			13998 165th Street Little Falls, MN 56345
LE-718	John Smith				Form Letter 1			Hwy 1 Finland, MN 55603
LE-719	Stephen Jay				Form Letter 1			7435 Central Ave Indianapolis, IN 46240
LE-720	Richard Fuller				Form Letter 1			1081 Laurel Ave Saint Paul, MN 55104
LE-721	Mike Mjelde				Form Letter 3			159 Whispering Ln Winona, MN 55987-1338
LE-722	Jane & Carl Schwensoh				Form Letter 3			1915 Sheridan Ave N Minneapolis, MN 55411-2337
LE-723	Catherine Krycuk				Form Letter 3			5904 Otter Ridge Cir White Bear Township, MN 55110-2299
LE-724	Kay Nelson				Form Letter 3			6844 Sheridan Ave S Richfield, MN 55423-2054
LE-725	Donald Johnson				Form Letter 3			300 Quail Path Mankato, MN 56001-7209
LE-726	kristine osbakken				Form Letter 3			5019 Glendale St Duluth, MN 55804-1106
LE-727	Richard Ottman				Form Letter 3			2335 Blomquist Ave White Bear Lake, MN 55110-4809
LE-728	Mary Elling				Form Letter 3			250 2nd Ave SW Apt 10 Aitkin, MN 56431-1647
LE-729	John Barbetta				Form Letter 3			55 Echo Bay Dr Excelsior, MN 55331-9577

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-730	Jerry Giefer				Form Letter 3			1252 2nd Ave N Windom, MN 56101-1557
LE-731	Rebecca Shedd				Form Letter 3			4554 Wentworth Ave Minneapolis, MN 55419-4944
LE-732	James Russell				Form Letter 3			805 Hidden Ln Excelsior, MN 55331-1916
LE-733	Jeff Stromgren				Form Letter 3			711 W Lake St Minneapolis, MN 55408-2918
LE-734	Gavin Sparby				Form Letter 3			2914 1st Ave Hibbing, MN 55746-2564
LE-735	Collette Theriault				Form Letter 3			33129 Nueman Trl Lindstrom, MN 55045-9121
LE-736	Howard Rife				Form Letter 3			2509 Park St Reading, PA 19606-1639
LE-737	Pamela & Doug Johnson				Form Letter 3			4775 Dodd Rd Eagan, MN 55123-2112
LE-738	Dianne Robertson				Form Letter 3			501 Main St NE Menahga, MN 56464-8701
LE-739	Harriet Mccleary				Form Letter 3			2440 Stevens Ave Apt 2 Minneapolis, MN 55404-3566
LE-740	Jerome Truer				Form Letter 3			2885 Knox Ave S Apt 705 Minneapolis, MN 55408-1854
LE-741	Kyle Brummond				Form Letter 3			8861 Xerxes Ave S Bloomington, MN 55431-1966
LE-742	Brian Freeman				Form Letter 3			3520 Cedar Creek Dr NW Oak Grove, MN 55303-8421
LE-743	Stacey Olszewski				Form Letter 3			1813 Pine St Hastings, MN 55033-3323
LE-744	John Leinen				Form Letter 3			14205 Saint Croix Trl N Stillwater, MN 55082-9587
LE-745	Sarah Hietpas				Form Letter 3			3704 Kindred Ct Lake Elmo, MN 55042-8575
LE-746	John Hinnars				Form Letter 3			20 S 55th Ave E Duluth, MN 55804-2563

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-747	Fred And Marlene Houd				Form Letter 3			858 Morrill Ln Elburn, IL 60119-7104
LE-748	Kimberly Johnson				Form Letter 3			13955 236th St N Scandia, MN 55073-9545
LE-749	Thomas Herdtle				Form Letter 3			7710 Banks Ct Inver Grove Heights, MN 55077-5810
LE-750	Jenna Randerson				Form Letter 3			2721 E 22nd St Minneapolis, MN 55406-1358
LE-751	John Phillips				Form Letter 3			1425 W 28th St Apt 514 Minneapolis, MN 55408-1980
LE-752	Susan Dzieweczynski				Form Letter 3			11396 170th St Little Falls, MN 56345-4141
LE-753	Brian Henjum				Form Letter 3			2935 Lindgren Ln Independence, MN 55359-9487
LE-754	Loren Skarie				Form Letter 3			45223 Lone Pine Rd Vergas, MN 56587-9569
LE-755	Tim Reede				Form Letter 3			3302 24th Ave S Minneapolis, MN 55406-2404
LE-756	Geoff Delperdang				Form Letter 3			1500 Saint Olaf Ave Northfield, MN 55057-1574
LE-757	Arlie Brandt				Form Letter 3			876 Hopewell Ln Saint Paul, MN 55124-9109
LE-758	John Powers				Form Letter 3			1635 S Michigan Ave # 206
LE-759	Andy Pearson				Form Letter 3			1425 Angelo Dr Golden Valley, MN 55422-4713
LE-760	Scott Mace				Form Letter 3			9450 Woodridge Dr Eden Prairie, MN 55347-2737
LE-761	Angela Ritter				Form Letter 3			1585 York Ave Saint Paul, MN 55106-3632
LE-762	Lois Wolff				Form Letter 3			76 Stevens St W Apt 207 Saint Paul, MN 55107-3663
LE-763	Aaron Franks				Form Letter 3			612 E Union St Morganton, NC 28655-3458

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-764	Brianna Tinjum				Form Letter 3			343 E 19th St Minneapolis, MN 55404-1875
LE-765	Thomas Abraham				Form Letter 3			8324 Carriage Hill Rd Savage, MN 55378-2341
LE-766	Linda Johaneson				Form Letter 3			739 Northwood Dr Delano, MN 55328-9244
LE-767	Brent Gurtek				Form Letter 3			1873 Korkki Road Duluth, MN 55804
LE-768	Lori Nagel				Form Letter 3			3277 Corliss Trl Rosemount, MN 55068-4722
LE-769	Nancy Long				Form Letter 3			1559 Moorhead Rd Cloquet, MN 55720-2697
LE-770	Paul Uecker				Form Letter 3			421 N 5th Ave W Duluth, MN 55806-2445
LE-771	Eric Ogdahl				Form Letter 3			7370 Parkview Ter Mounds View, MN 55112-4133
LE-772	Sharon Androff				Form Letter 3			8901 47th Ave N Minneapolis, MN 55428-4414
LE-773	Edith Kelnhofer				Form Letter 3			4523 Brunswick Ave N Crystal, MN 55422-1014
LE-774	Diane Tiffany				Form Letter 3			4012 43rd Ave S Minneapolis, MN 55406-4403
LE-775	Jamie O'Connor				Form Letter 3			108 1st St Apt 4 Courtland, MN 56021-9762
LE-776	Nicholas Eustice				Form Letter 3			725 Francis St Faribault, MN 55021-6215
LE-777	Loretta Griffin				Form Letter 3			509 Pelican Lake Ct NE Avon, MN 56310-8659
LE-778	Duane Gustafson				Form Letter 3			6155 141st Ave NE Forest Lake, MN 55025-9422
LE-779	Mary Fran Gebhard				Form Letter 3			St. Benedict'S Monastery 107 C St Joseph, MN 56374-2020
LE-780	Amber Reilly				Form Letter 3			4024 8th Ave Anoka, MN 55303-1256
LE-781	Lee Sievers				Form Letter 3			5516 Queen Ave S Minneapolis, MN 55410-2531

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-782	Winna Althiser				Form Letter 3			836 Little Norway Ave SE Bemidji, MN 56601-8936
LE-783	Thomas Bluml				Form Letter 3			7610 Bristol Village Curv Bloomington, MN 55438-2567
LE-784	Pauline Wahlquist				Form Letter 3			10979 State Hwy 23 Brook Park, MN 55007-4726
LE-785	Meghan Porter				Form Letter 3			7650 185th Ave Becker, MN 55308-8743
LE-786	Ryan Rentner				Form Letter 3			3441 Dupont Ave S Apt 305
LE-787	Tim Gabbert				Form Letter 3			103 S Cove Ct Williamsburg, VA 23188-9325
LE-788	Marty Cobenais				Form Letter 3			PO Box 485 Bemidji, MN 56619-0485
LE-789	Will Bildsten				Form Letter 3			147 Prospect Ave Minneapolis, MN 55419-1303
LE-790	Claudette Hudalla				Form Letter 3			421 Daly St Saint Paul, MN 55102-3531
LE-791	Richard Caswell				Form Letter 3			PO Box 308 Wayzata, MN 55391-0308
LE-792	Melissa Tomsich				Form Letter 3			1146 E Washington St Ely, MN 55731-1708
LE-793	Sharon Nolte				Form Letter 3			8815 Colfax Ave S Bloomington, MN 55420-2619
LE-794	David Councilman				Form Letter 3			8801 Westmoreland Ln St Louis Park, MN 55426-1936
LE-795	Catherine Miller				Form Letter 3			410 10th St SW Willmar, MN 56201-3143
LE-796	Charles Burgess				Form Letter 3			1217 W Menk Dr Saint Peter, MN 56082-7514
LE-797	Mel Strand				Form Letter 3			13342 382nd Ave Waseca, MN 56093-4200
LE-798	Gregory Chamberlin				Form Letter 3			237 6th Ave N Hopkins, MN 55343-7306
LE-799	Jay MUTSCHLER				Form Letter 3			7025 Knox Ave S Richfield, MN 55423-2952



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-800	Thomas Thiss				Form Letter 3			23740 Lawtonka Dr Excelsior, MN 55331-1767
LE-801	Rosanna Walker				Form Letter 3			315 26th St NE Bemidji, MN 56601-2314
LE-802	Stephanie Sarich				Form Letter 3			10511 Cedar Lake Rd Minnetonka, MN 55305-3375
LE-803	Johann Hollar				Form Letter 3			2044 Fremont Ave E Saint Paul, MN 55119-4016
LE-804	Joanna Coyle				Form Letter 3			1035 Nightingale Blvd Stillwater, MN 55082-5234
LE-805	Gail Grabow				Form Letter 3			4610 Bryant Ave S Apt 304 Minneapolis, MN 55419-5369
LE-806	Louann Lanning				Form Letter 3			7318 W 22nd St Apt 206 St Louis Park, MN 55426-2739
LE-807	Julie Obermeyer				Form Letter 3			3029 Polk St NE Minneapolis, MN 55418-2127
LE-808	Stephen Paylor				Form Letter 3			11880 89th Ave SE Blooming Prairie, MN 55917-6922
LE-809	Maarten Kuester				Form Letter 3			PO Box 6723 Rochester, MN 55903-6723
LE-810	Noelle Mccleaf				Form Letter 3			2020 Pillsbury Ave S Apt 304 Minneapolis, MN 55404-2345
LE-811	Dean Borgeson				Form Letter 3			9208 Erickson Ct N Brooklyn Park, MN 55428-1874
LE-812	Pamela James				Form Letter 3			2320 Country Club Pkwy Moorhead, MN 56560-1414
LE-813	James Bohen				Form Letter 3			1960 Ashland Ave Saint Paul, MN 55104-5830
LE-814	Philip Aaron				Form Letter 3			4809 W 27th St Saint Louis Park, MN 55416-1932
LE-815	Gary Gilthvedt				Form Letter 3			218 S Evelyn Ave. Grygla, MN 56727

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-816	Tara Cross				Form Letter 3			1729 Crossings Blvd Shakopee, MN 55379-8519
LE-817	Lily Frenette				Form Letter 3			1369 60th St NE Buffalo, MN 55313-3649
LE-818	Carol Mellom				Form Letter 3			854 Stryker Ave Saint Paul, MN 55107-3355
LE-819	George Matkovits				Form Letter 3			8077 Timber Lake Dr Eden Prairie, MN 55347-1140
LE-820	Cj Lindor				Form Letter 3			3544 44th Ave S Minneapolis, MN 55406-2904
LE-821	Rev. Judith Vanosdol				Form Letter 3			1550 Eustis St Apt N Saint Paul, MN 55108-1259
LE-822	Nora Hanson				Form Letter 3			PO Box 192 Donnelly, MN 56235-0192
LE-823	Maureen Tyra				Form Letter 3			4555 Kimberly Ct N Minneapolis, MN 55446-1396
LE-824	Julie Garner-Pringle				Form Letter 3			4921 3rd Ave S Minneapolis, MN 55419-5629
LE-825	James Mandeville				Form Letter 3			2 Saint Albans Rd W Hopkins, MN 55305-4416
LE-826	Tyler Broadwell				Form Letter 3			742 3rd St N Sartell, MN 56377-1747
LE-827	Anton Matwiejko				Form Letter 3			2701 Comstock Ln N Minneapolis, MN 55447-1830
LE-828	Monte Gomke				Form Letter 3			2914 Greysolon Rd Duluth, MN 55812-2312
LE-829	Brendon Bryan				Form Letter 3			125 18th Ave N Saint Cloud, MN 56303-4547
LE-830	Pamela Henjum				Form Letter 3			2935 Lindgren Ln Independence, MN 55359-9487
LE-831	Carla Arneson				Form Letter 3			PO Box 336 Ely, MN 55731-0336
LE-832	Charles Gribble				Form Letter 3			1988 Sheridan Ave S Minneapolis, MN 55405-2211
LE-833	John Yackel				Form Letter 3			20 E Golden Lake Rd Circle Pines, MN 55014-1725
LE-834	Kris Hermel				Form Letter 3			15360 Fairlawn Prior Lake, MN 55372

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-835	Joyce Burk				Form Letter 3			PO Box 106 Barstow, CA 92312-0106
LE-836	Florence Iverson				Form Letter 3			2812 Highway 88 Minneapolis, MN 55418-3243
LE-837	Barbara Stamp				Form Letter 3			6901 W 84th St Bloomington, MN 55438
LE-838	Katarina Rush				Form Letter 3			629 Chestnut St Cloquet, MN 55720-1439
LE-839	Daniel Casar				Form Letter 3			1114 Pike Lake Dr Saint Paul, MN 55112-2460
LE-840	Cheryl Engel				Form Letter 3			4933 Nokomis Ave Minneapolis, MN 55417-1435
LE-841	Judy Solmonson				Form Letter 3			1895 Bohland Ave Saint Paul, MN 55116-1905
LE-842	Lisa Burke				Form Letter 3			2147 Terrace Dr Mounds View, MN 55112-1277
LE-843	Judy Solmonson				Form Letter 3			1895 Bohland Ave Saint Paul, MN 55116-1905
LE-844	Curtis Coffer				Form Letter 3			1432 Cherry Hill Rd Mendota Heights, MN 55118-2710
LE-845	Jeanne M. Hollingswort				Form Letter 3			PO Box 6193 Minneapolis, MN 55406-0193
LE-846	Nancy Drake				Form Letter 3			5908 Morgan Ave S Minneapolis, MN 55419-2009
LE-847	Michael Kinney				Form Letter 3			610 8th Ave SW Austin, MN 55912-2752
LE-848	M Richardson				Form Letter 3			1138 charles st paul, MN 55104
LE-849	Martha Krikava				Form Letter 3			9696 101st St N. Stillwater, MN 55082
LE-850	Carolyn Stabene				Form Letter 3			301 3rd St S Princeton, MN 55371-1804
LE-851	Nancy Drake				Form Letter 3			5908 Morgan Ave S Minneapolis, MN 55419-2009
LE-852	Dale Hadler				Form Letter 3			PO Box 6397 Minneapolis, MN 55406

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-853	Mia Nosanow				Form Letter 3			2120 Carter Ave Saint Paul, MN 55108-1708
LE-854	stuart astleford				Form Letter 3			3101 W 47th St Minneapolis, MN 55410-1831
LE-855	Peter Veits				Form Letter 3			641 E Burnsville Pkwy Burnsville, MN 55337-3651
LE-856	Margaret Kramer				Form Letter 3			810 Lexington Pkwy S Saint Paul, MN 55116-2350
LE-857	Donna Nelson				Form Letter 3			2574 4th Ave E Saint Paul, MN 55109-3023
LE-858	Jennifer Davis				Form Letter 3			3216 Skycroft Dr Minneapolis, MN 55418-2552
LE-859	Jean Strandness				Form Letter 3			1625 3rd St S Moorhead, MN 56560-4176
LE-860	Carol Reins				Form Letter 3			n/a Saint Paul, MN 55104
LE-861	Eeva Miller				Form Letter 3			701 W. Hampton St. Marquette, MI 49855
LE-862	Patricia Ward				Form Letter 3	1	SOO	5220 38th Ave S Minneapolis, MN 55417-2110
LE-863	Kiersten Ruda				Form Letter 3	1	SOO	1923 Warbler Ln Saint Paul, MN 55119-4914
LE-864	Elizabeth Javinsky				Form Letter 3			2319 Flag Ave S St Louis Park, MN 55426-2332
LE-865	Francis Lemke				Form Letter 3			3325 Vernon St Duluth, MN 55806-1326
LE-866	Kate Crowley				Form Letter 3	1	SOO	82119 Bennett Rd Willow River, MN 55795-3079
LE-867	Richard Collman				Form Letter 3	1	SOO	15 Fareway Dr Northfield, MN 55057-2642
LE-868	Anthony Shields				Form Letter 3	1	SOO	615 Fulton St SE # E227 Minneapolis, MN 55455-0360
LE-869	Stan And Nancy Partin				Form Letter 3	1	SOO	1504 Archibald St Northfield, MN 55057-2874
LE-870	John Viacrusis				Form Letter 3	1	SOO	3002 17th St. S Apt. 206 Moorhead, MN 56560

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-871	Rick Dahn				Form Letter 3	1	SOO	50 Hays Cir Silver Bay, MN 55614-1242
LE-872	Richard Worm				Form Letter 3	2	SOO	3680 Wcho Hills Dr. Bellevue, IA 52031-9557
LE-873	Catherine Mosher				Form Letter 3	1	SOO	3840 45th Ave S Minneapolis, MN 55406-3518
LE-874	Diadra Decker	Water Legacy Board			Form Letter 3	2	ECO;GSA;MPD;MRK;WET	
LE-875	Corey Anthony				Form Letter 3			110 E 1st St Chaska, MN 55318-1968
LE-876	Frank Broderick				Form Letter 3	1	SOO	610 3rd Ave NE Minneapolis
LE-877	Rebecca Nyberg				Form Letter 3	1	WET	4125 Sylvia Ln S Shoreview, MN 55126-6433
LE-878	Christine Anderson				Form Letter 3			154 12th Ave NE Minneapolis, MN 55413-1396
LE-879	Leslie Minkler				Form Letter 3			127 W 26th St Apt 10 Minneapolis, MN 55404-4219
LE-880	Maureen O'Connor				Form Letter 3			4364 Copper Pt Eagan, MN 55122-2006
LE-881	Edward Foreman				Form Letter 3			8725 Promenade Ln Woodbury, MN 55125-9622
LE-882	Joan Hughes				Form Letter 3			4088 Utica Ave S 4088 Utica Ave S
LE-883	Jane Nichols				Form Letter 3			16570 Anna Trl SE Apt 1 Prior Lake, MN 55372-4537
LE-884	Steve Mark				Form Letter 3			3516 Arbor Ln Minnetonka, MN 55305-4247
LE-885	Ellen Ruffin				Form Letter 3			1916 S 6th St Minneapolis, MN 55454-1211
LE-886	Hideki Yamada				Form Letter 3			1588 Bellows St West Saint Paul, MN 55118-3314
LE-887	Courtney Caswell				Form Letter 3			19622 Waterford Ct Excelsior, MN 55331-7025
LE-888	Fran Whitman				Form Letter 3			13856 Ford Dr Lanse, MI 49946-8344



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-889	Kevin Mckeever				Form Letter 3			4106 41st Ave S Minneapolis, MN 55406-3422
LE-890	Kathleen Wilkinson				Form Letter 3			67994 County Road 76 Wabasha, MN 55981-7638
LE-891	Kathleen Wilkinson				Form Letter 3			67994 County Road 76 Wabasha, MN 55981-7638
LE-892	Antje Göttert				Form Letter 3			Katzenloch 23 Kempfeld, None 55758
LE-893	Richard Kimpel				Form Letter 3			15230 18th Ave N Apt 511
LE-894	Edith Thorstensson				Form Letter 3			809 S 7th St Saint Peter, MN 56082-1436
LE-895	Brianna Mattson				Form Letter 3			200 Oak St SE Minneapolis, MN 55455-2009
LE-896	EdwardB Bennett				Form Letter 3			2719 Marin Ave Berkeley, CA 94708-1529
LE-897	Clayton Daughenbaugh				Form Letter 3			1311 Elmwood Ave Berwyn, IL 60402-1138
LE-898	Mina Ingersoll				Form Letter 3			5522 W Bald Eagle Blvd White Bear Lake, MN 55110-6412
LE-899	Brian Cheslog				Form Letter 3			9291 Jarrod Ave S Cottage Grove, MN 55016-5002
LE-900	Thomas Crampton				Form Letter 3			8920 61st Ave N New Hope, MN 55428-2675
LE-901	Sharon Fortunak				Form Letter 3			7120 Ivystone Ave South Cottage Grove, MN 55016
LE-902	Linda Gawthrop				Form Letter 3			3716 41st Ave S Minneapolis, MN 55406-2809
LE-903	Kristi Roen				Form Letter 3			3016 W 44th St Apt 3 Minneapolis, MN 55410-1545
LE-904	Craig Brown				Form Letter 3			2908 Southbrook Dr Bloomington, MN 55431-2447
LE-905	TIM STEVENS				Form Letter 3			2283 Amanisoti Dr Carlton, MN 55718-8184
LE-906	Herb LePlatt				Form Letter 3			7012 Cheyenne Trl Chanhassen, MN 55317-9504

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-907	Jerry Fitzgerald				Form Letter 3			4181 Tall Timber Trl NW Hackensack, MN 56452-2265
LE-908	Erica Gatzow				Form Letter 3			8 Meadow Ln Morris, MN 56267-1508
LE-909	Richard Purple				Form Letter 3			63 Barton Ave SE Minneapolis, MN 55414-3511
LE-910	Janet Aslani				Form Letter 3			1391 Sheldon St Saint Paul, MN 55108-2410
LE-911	Greta Gaard				Form Letter 3			4638 15th Ave S Minneapolis, MN 55407-3653
LE-912	Chris Howard				Form Letter 3			6193 Wild Horse Canyon Rd Snow Camp, NC 27349-9568
LE-913	Randall Kroening				Form Letter 3			1826 S Spring St New Ulm, MN 56073-2201
LE-914	JR Slama				Form Letter 3			3553 Widgeon Way Eagan, MN 55123-1004
LE-915	Beverly Adams				Form Letter 3			2523 16th Ave S Minneapolis, MN 55404-3907
LE-916	Art Wilkinson				Form Letter 3			830 Winthrop St S Saint Paul, MN 55119-5649
LE-917	Richard Fish				Form Letter 3			5345 37th Ave S Minneapolis, MN 55417-2129
LE-918	Sharon Rosseland				Form Letter 3			50 Main St Stony Brook, NY 11790-1913
LE-919	Michael & Deborah Tho				Form Letter 3			5044 Morgan Ave S Minneapolis, MN 55419-1024
LE-920	Denise Obermeyer				Form Letter 3			3029 Polk St NE Minneapolis, MN 55418-2127
LE-921	Richard Sloat				Form Letter 3			223 N 8th Ave Iron River, MI 49935-1611
LE-922	Robert and Paula Lund				Form Letter 3			16358 County Road 25 Brainerd, MN 56401-5449
LE-923	Jean Ross				Form Letter 3			3624 Bryant Ave S Minneapolis, MN 55409-1018
LE-924	Jennifer Goar				Form Letter 3			3515 Arbor Ln Minnetonka, MN 55305-4248

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-925	Laurie Henning				Form Letter 3			3754 Major Ave N Minneapolis, MN 55422-2103
LE-926	Mary Brown				Form Letter 3			1313 Springmist Dr Charlotte, NC 28262-3281
LE-927	Terry Richmond				Form Letter 3			2900 County Road 19 Maple Plain, MN 55359-9386
LE-928	Lyn Yount				Form Letter 3			8432 Stevens Ave S Bloomington, MN 55420-2365
LE-929	Anastasia Bamford				Form Letter 3			120 N 42nd Ave E Duluth, MN 55804-2126
LE-930	Stacey Kawakami				Form Letter 3			928 Franklin Ter Minneapolis, MN 55406-1101
LE-931	Diana Olson				Form Letter 3			215 9th St W Saint Paul, MN 55102-1071
LE-932	Lisa Bergerud				Form Letter 3			1261 Cleveland Ave N Saint Paul, MN 55108-1826
LE-933	Matt Johansen				Form Letter 3			10355 Greenfield Road Greenfield, MN 55357
LE-934	Sarah Schille				Form Letter 3			1060 Ottawa Ave # 2 Saint Paul, MN 55118-1103
LE-935	Cathleen Hauenstein				Form Letter 3			1131 Parkview Ln Eagan, MN 55123-1845
LE-936	Julie Cox				Form Letter 3			3111 12th Ave S Apt 1 Minneapolis, MN 55407-6603
LE-937	Janet Levy				Form Letter 3			120 Canabury Ct Little Canada, MN 55117-1502
LE-938	Michelle Parsneau				Form Letter 3			418 E Walnut St Mankato, MN 56001-3758
LE-939	Russell Hindle				Form Letter 3			6101 Spice Ridge Ln Raleigh, NC 27606-7728
LE-940	Jayne Kercheval				Form Letter 3			2220 W 58th St Indianapolis, IN 46228-1712
LE-941	Dinda Evans				Form Letter 3			PO Box 178695 San Diego, CA 92177-8695
LE-942	Don Weirens				Form Letter 3			3401 Huntington Ave Minneapolis, MN 55416-4721

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-943	Mary Krome				Form Letter 3			17620 SW 83rd Ave Archer, FL 32618-3024
LE-944	Therese Zemlin				Form Letter 3			1 Highland Wayside Andover
LE-945	DAVID REISENWEBE				Form Letter 3			111 Garden St Duluth, MN 55812-1142
LE-946	Richard Bergman				Form Letter 3			317 Valley Rd Two Harbors, MN 55616-1482
LE-947	Erik Roth				Form Letter 3			225 W 15th St Apt 412 Minneapolis, MN 55403-2219
LE-948	Kimberly Wiley				Form Letter 3			72 Chimney Hill Rd Rochester, NY 14612-1640
LE-949	victor khayat				Form Letter 3			15 McIntosh Dr New Ulm, MN 56073-3352
LE-950	Rob Galler				Form Letter 3			570 Riverside Dr NE Saint Cloud, MN 56304-0134
LE-951	lee McDonald				Form Letter 3			31 Madoc St Newton, MA 02459-2330
LE-952	Kim Kokett				Form Letter 3			2243 Buchanan St NE Minneapolis, MN 55418-3815
LE-953	Sandy Maxfield				Form Letter 3			15401 Nutria St NW Anoka, MN 55303-7001
LE-954	Tom McKinney				Form Letter 3			3712 36th Ave S Minneapolis, MN 55406-2756
LE-955	Mina Blyly-Strauss				Form Letter 3			3425 Blaisdell Ave Minneapolis, MN 55408-4316
LE-956	Wendy Smith				Form Letter 3			5017 3rd Ave S Minneapolis, MN 55419-1413
LE-957	Chris Raebel				Form Letter 3			4142 25th Ave S Minneapolis, MN 55406-3032
LE-958	Steven Pesavento				Form Letter 3			PO Box 967 St Johns University
LE-959	Melody Brekhus				Form Letter 3			3337 31st Ave S Minneapolis, MN 55406-2047
LE-960	Matthew Koncar				Form Letter 3			1736 Malvern St Lauderdale, MN 55113-5236

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-961	Kathleen Moraski				Form Letter 3			7611 Teal Bay Woodbury, MN 55125
LE-962	Jay Hutchinson				Form Letter 3			1841 Simpson St Saint Paul, MN 55113-6144
LE-963	Paul Wilberg				Form Letter 3			1428 Frankson Ave Saint Paul, MN 55108-2403
LE-964	Nancy Carroll				Form Letter 3			715 E 61st St Minneapolis, MN 55417-3104
LE-965	Josh Matter				Form Letter 3			3938 3rd Pl NW Rochester, MN 55901-8444
LE-966	paul thompson				Form Letter 3			4244 Crocker Ave Edina, MN 55416-5012
LE-967	Jennifer Schally				Form Letter 3			1104 Creekside Cir Stillwater, MN 55082-9651
LE-968	William Gonzalez Garci				Form Letter 3			200 Dashew Dr Apt A15 Airmont, NY 10901-4289
LE-969	Catherine Parker				Form Letter 3			322 W Ohio St Marquette, MI 49855-3420
LE-970	William Mckinney				Form Letter 3			3712 36th Ave S Minneapolis, MN 55406-2756
LE-971	Paul Strickland				Form Letter 3			1818 Minneapolis, MN 55403
LE-972	Alice Tobias				Form Letter 3			1436 California Ave W Falcon Heights, MN 55108-2104
LE-973	dave kircher				Form Letter 3			6519 White Oak Rd Lino Lakes, MN 55038-9614
LE-974	Norman Erickson				Form Letter 3			1303 5th Ave NE Rochester, MN 55906-7076
LE-975	Tom Kurhajetz				Form Letter 3			32337 Countryside Loop Willow River, MN 55795-3066
LE-976	J Alvey				Form Letter 3			135 Stinson Blvd New Brighton, MN 55112-3101
LE-977	Jason Meier				Form Letter 3			7808 18th St N Oakdale, MN 55128-5613
LE-978	Brad Behrens				Form Letter 3			1613 Monroe Ct Northfield, MN 55057-3017



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-979	Alysa Zimmerle				Form Letter 3			7237 178th Ave NE Forest Lake, MN 55025-8842
LE-980	Robert Fitzgerald				Form Letter 3			708 11th Ave NE Rochester, MN 55906-4456
LE-981	Pam Frink				Form Letter 3			2228 Reiling Rd White Bear Lake, MN 55110-1007
LE-982	tanya peterson				Form Letter 3			6012 Red Oak Dr Rockford, MN 55373-9594
LE-983	Karen Lawson				Form Letter 3			2708 Inglewood Ave S St Louis Park, MN 55416-3930
LE-984	Elizabeth Schaefer				Form Letter 3			4655 Victoria St N Apt 203 Shoreview, MN 55126-5888
LE-985	Lily Frink				Form Letter 3			2228 Reiling Rd White Bear Lake, MN 55110-1007
LE-986	Deb Monacelli				Form Letter 3			401 13th St N Virginia, MN 55792-2229
LE-987	Warren Howe				Form Letter 3			1112 S Lake Ave Duluth, MN 55802-2410
LE-988	Pete Nelson				Form Letter 3			3244 32nd Ave S Minneapolis, MN 55406-2013
LE-989	Elaine Leach				Form Letter 3			8175 County 78 Lake Shore, MN 56468-2531
LE-990	John Ellefson				Form Letter 3			4571 Spinner Trl NE Remer, MN 56672-3153
LE-991	tom jones				Form Letter 3			407 harvard grand forks, ND 58203
LE-992	Vv Bates				Form Letter 3			2612 W 40th St Minneapolis, MN 55410-1215
LE-993	Stephanie Lof				Form Letter 3			33040 State 34 Akeley, MN 56433-8446
LE-994	Inken Purvis				Form Letter 3			2201 Calais Dr Longmont, CO 80504-1743
LE-995	Cecilia Redding				Form Letter 3			2008 Brassfield Rd Raleigh, NC 27614-9452
LE-996	Mary Lou Wilm				Form Letter 3			2919 45th Ave. S. Mpls, MN 55406

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-997	Roderick Haberman				Form Letter 3			43894 115th Ave Holdingford, MN 56340-9791
LE-998	Alice Laudon				Form Letter 3			1000 Northern Heights Dr NE Rochester, MN 55906-4040
LE-999	Elizabeth Merryman				Form Letter 3			3660 37th Ave S Minneapolis, MN 55406-2708
LE-1000	Edith deGroot				Form Letter 3			4786 Anderson Ln Saint Paul, MN 55126-5853
LE-1001	Bob Griffin				Form Letter 3			2956 Blue Ridge Dr Woodbury, MN 55125-3486
LE-1002	Eric Utne				Form Letter 3			4259 Linden Hills Blvd Minneapolis, MN 55410-1607
LE-1003	Naim Gudul				Form Letter 3			6 Red Pine Ln North Oaks, MN 55127-2031
LE-1004	Paula Allmaras				Form Letter 3			1932 Ashland Ave Saint Paul, MN 55104-7801
LE-1005	Grant Tiefenbruck				Form Letter 3			8989 Jasmine Ln S Cottage Grove, MN 55016-3436
LE-1006	Tracia Sedivy				Form Letter 3			1587 County Road D E Maplewood, MN 55109-5337
LE-1007	Dorie Reisenweber				Form Letter 3			111 Garden St Duluth, MN 55812-1142
LE-1008	Shirley Phillips				Form Letter 3			6708 Bentwinds Ln Fuquay Varina, NC 27526-7572
LE-1009	Deborah Bieleck				Form Letter 3			13612 Irving Ave S Burnsville, MN 55337-4380
LE-1010	Eugene Richardson				Form Letter 3			1635 Winthrop St N Saint Paul, MN 55119-3079
LE-1011	Brett Smith				Form Letter 3			5300 Irving Ave S Minneapolis, MN 55419-1130
LE-1012	Jackie Bartosh				Form Letter 3			2244 S Middle River Rd South Range, WI 54874-8656
LE-1013	Bridget Riversmith				Form Letter 3			225 E Anoka St Duluth, MN 55803

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1014	Dorie Reisenweber				Form Letter 3			111 Garden St Duluth, MN 55812-1142
LE-1015	Ed And Linda Frost				Form Letter 3			1 Lincoln Ln Northfield, MN 55057-1503
LE-1016	Ariel Kirst				Form Letter 3			2040 Inca Ln New Brighton, MN 55112-3136
LE-1017	Florence Sandok				Form Letter 3			1516 13th Ave NE Rochester, MN 55906-4346
LE-1018	Mark Burrell				Form Letter 3			3407 Grove Ave Richmond, VA 23221-2733
LE-1019	Nathan Hofstad				Form Letter 3			539 Main St S Pine City, MN 55063-1659
LE-1020	Scott D Bradley				Form Letter 3			4510 Chatsworth St N Saint Paul, MN 55126-2207
LE-1021	Alice Hausman				Form Letter 3			100 Martin Luther King Jr Blvd 453 State Office Bldg
LE-1022	Victoria Horberg				Form Letter 3			2701 Dupont Ave S Apt 3 Minneapolis, MN 55408-1288
LE-1023	Rebecca Miller				Form Letter 3			3215 37th Ave S Minneapolis, MN 55406-2136
LE-1024	Paige Krumme				Form Letter 3			2624 109th Ave NE Blaine, MN 55449-5366
LE-1025	Alyssa Vander Galien				Form Letter 3			455 Old Highway 8 SW Apt 304
LE-1026	Janet Draper				Form Letter 3			1825 Dunedin Avenue Duluth, MN 55803
LE-1027	Ryan Mooreson				Form Letter 3			1212 Washington Memorial Dr Apt 208 Saint Cloud, MN 56301-3519
LE-1028	Karen Lucht				Form Letter 3			1727 9th St E Glencoe, MN 55336-2507
LE-1029	Kathy Smith				Form Letter 3			3990 Saari Rd Hibbing, MN 55746-8250
LE-1030	Andrew and Sandra Clar				Form Letter 3			5 Dogwood Ln North Oaks, MN 55127-2168

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1031	mark odegard				Form Letter 3			602 3rd Ave NE Minneapolis, MN 55413-2258
LE-1032	Judy Johnson				Form Letter 3			2566 Ellis Ave Apt 115 Saint Paul, MN 55114-1446
LE-1033	Lee Recknor				Form Letter 3			2602 17th Ave NW Rochester, MN 55901-7784
LE-1034	Becky Hoffmann				Form Letter 3			2550 Johnson St NE Minneapolis, MN 55418-3941
LE-1035	Michael Anhalt				Form Letter 3			1026 Market St S Shakopee, MN 55379-2843
LE-1036	Lynda Haemig				Form Letter 3			7161 Riverview Ter NE Fridley, MN 55432-3046
LE-1037	Carrie Raber				Form Letter 3			1932 Linda Ln Saint Cloud, MN 56301-4968
LE-1038	Juliann Rule				Form Letter 3			35002 115th Avenue Avon, MN 56310
LE-1039	Janet Dray				Form Letter 3			2741 Colfax Ave S Minneapolis, MN 55408-1262
LE-1040	Katie Jones				Form Letter 3			707 5th St SE Apt 102 Minneapolis, MN 55414-1875
LE-1041	Barbara Rupert				Form Letter 3			4777 McComber Rd Duluth, MN 55803-9458
LE-1042	Ron Peterson				Form Letter 3			25736 Quinlan Ave Lindstrom, MN 55045-8026
LE-1043	Janelle Kaye				Form Letter 3			1153 5th Ave Windom, MN 56101-1423
LE-1044	Pati Galligan				Form Letter 3			6350 Quincy St NE Fridley, MN 55432-5064
LE-1045	Shaun Okeefe				Form Letter 3			4305 Columbus Ave Minneapolis, MN 55407-3116
LE-1046	Jodi Peterson				Form Letter 3			9508 Russell Ave S Bloomington, MN 55431-2434
LE-1047	Matt Kirby				Form Letter 3			1837 16th St NW Washington, DC 20009-3317
LE-1048	Adnan Mustafa				Form Letter 3			102 10th St NW Rochester, MN 55901-6825

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1049	gary hippert				Form Letter 3			22239 hwy6 Deerwood, MN 56444
LE-1050	Cammi Telshaw				Form Letter 3			5770 Birchwood Ave NE Prior Lake, MN 55372-1313
LE-1051	Robert Meyer				Form Letter 3			24275 W Typo Dr NE Stacy, MN 55079-9334
LE-1052	Elizabeth Sandell				Form Letter 3			4161 Jordan Ave N New Hope, MN 55427-1051
LE-1053	Jean Lesteberg				Form Letter 3			955 40th St SE De Graff, MN 56271-9099
LE-1054	JoAnn Olson				Form Letter 3			20 Ruttan Hall St. Paul, MN 55128
LE-1055	Mary Polta				Form Letter 3			1610 Sunset Ave Apt 121 New Ulm, MN 56073-2085
LE-1056	Jay Satterwhite				Form Letter 3			3896 Stonebridge Dr N Eagan, MN 55123-1640
LE-1057	Jason Gritti				Form Letter 3			3405 30th Ave N Minneapolis, MN 55422-3768
LE-1058	Roberta Hodgdon				Form Letter 3			18410 Priory Ave Minnetonka, MN 55345-2459
LE-1059	James Koschak				Form Letter 3			1329 East Harvey Ely, MN 55731
LE-1060	Bruce Goff				Form Letter 3			782 Mill Run Path Eagan, MN 55123-1689
LE-1061	Kevin Koschak				Form Letter 3			2384 151st Ave NW street 2
LE-1062	Christopher Herzog				Form Letter 3			39350 Naples St NE Stanchfield, MN 55080-5041
LE-1063	Rebecca Harrison				Form Letter 3			730 Stinson Blvd Unit 112 Minneapolis, MN 55413-2974
LE-1064	John Roche				Form Letter 3			5608 W 107th St Bloomington, MN 55437-2708
LE-1065	Shane DeFeyter				Form Letter 3			6110 191st Ln NW Anoka, MN 55303-9608



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1066	Malcolm Nazareth				Form Letter 3			720 4th Ave S Saint Cloud, MN 56301-4442
LE-1067	Kimberly Eckman				Form Letter 3			307 12th Ln SW Oronoco, MN 55960-1703
LE-1068	Molly Uvaas				Form Letter 3			901 2nd St. NE #205 Minneapolis, MN 55413
LE-1069	Tara Koschak				Form Letter 3			tnellie@yahoo.com Andover, MN 55304
LE-1070	Linda Merritt				Form Letter 3			2926 Bryant Ave S Minneapolis, MN 55408-2127
LE-1071	Thomas Krumme				Form Letter 3			901 2nd St. NE #205 Minneapolis, MN 55413
LE-1072	Daniel Pastorius				Form Letter 3			1315 Wyncrest Ct Arden Hills, MN 55112-5774
LE-1073	Daniel Peterson				Form Letter 3			522 96th Ln NE Blaine, MN 55434-2591
LE-1074	Bruce D Chambers				Form Letter 3			3019 Lincoln St NE Minneapolis, MN 55418-2260
LE-1075	Maria Novak				Form Letter 3			16404 Taconite St NE Ham Lake, MN 55304-5745
LE-1076	Susan & Grant Hawthor				Form Letter 3			2831 Blueberry Is Ely, MN 55731-8349
LE-1077	Merrie Sue Holtan				Form Letter 3			43497 County Highway 53 Perham, MN 56573-8884
LE-1078	Katie Prock				Form Letter 3			1387 Cleveland Ave N Saint Paul, MN 55108-1712
LE-1079	Michael Erickson				Form Letter 3			2515 S 9th St Apt 1609 Minneapolis, MN 55406-1037
LE-1080	Jill Sobiech				Form Letter 3			3728 Regent Ave N Robbinsdale, MN 55422-2034
LE-1081	Amy Hubbard				Form Letter 3			3325 W 34 1/2 St Minneapolis, MN 55416-4652
LE-1082	Donald Wahlberg				Form Letter 3			1451 Arden Pl Arden Hills, MN 55112-3663
LE-1083	Eugene Richardson				Form Letter 3			1635 Winthrop St N Saint Paul, MN 55119-3079

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1084	Mollie Schierman				Form Letter 3			4146 Zenith Ave N Robbinsdale, MN 55422-1524
LE-1085	Melissa Paetzel				Form Letter 3			526 E Sanborn St Winona, MN 55987-4361
LE-1086	Nanciann Kruse				Form Letter 3			2547 37th Ave S Minneapolis, MN 55406-1745
LE-1087	Louise Miner				Form Letter 3			2158 Hartford Ave Saint Paul, MN 55116-1250
LE-1088	Robin Poppe				Form Letter 3			3249 Sandy Pines Rd Barnum, MN 55707-8766
LE-1089	Karen Hatlestad				Form Letter 3			2044 Edgerton St Maplewood, MN 55117-2118
LE-1090	Joanne Engelking				Form Letter 3			7520 Cahill Rd Apt 316A Minneapolis, MN 55439-2778
LE-1091	Jackie Vo				Form Letter 3			456 Woodcock Ct Milpitas, CA 95035-2826
LE-1092	B Morello				Form Letter 3			984 Harrison Ferry Rd White Pine, TN 37890-4903
LE-1093	Dan Iverson				Form Letter 3			4640 North Arm Drive Mound, MN 55364
LE-1094	David Dosch				Form Letter 3			3133 Wembley Ln NW Rochester, MN 55901-4171
LE-1095	Liam O'Dea				Form Letter 3			279 Winona St E Uppr UNIT Saint Paul, MN 55107-3114
LE-1096	Lynn Lang				Form Letter 3			1721 Polaris Court Saint Cloud, MN 56303
LE-1097	Pamela Kae Novotny				Form Letter 3			4401 Dodge St Duluth, MN 55804-1409
LE-1098	Tonia Hufnagel				Form Letter 3			5741 158th Ct NW Ramsey, MN 55303-4716
LE-1099	Jennifer Malusky				Form Letter 3			5804 1st St NW Moorhead, MN 56560-6316
LE-1100	William Herzberg				Form Letter 3			PO Box 578 Finland, MN 55603-0578
LE-1101	Skye Healy				Form Letter 3			1061 Bradley St Saint Paul, MN 55130-3803

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1102	Margaret Goodnough				Form Letter 3			6644 Upton Ave S Richfield, MN 55423-1907
LE-1103	April Narcisse				Form Letter 3			PO Box 385437 Bloomington, MN 55438-5437
LE-1104	C Lee Beaty				Form Letter 3			2801 42nd Ave S Minneapolis, MN 55406-1817
LE-1105	Jerome Comeau				Form Letter 3			3316 Emerson Ave S Minneapolis, MN 55408
LE-1106	Deanna Eaves				Form Letter 3			16198 Edgewater Rd NE Pine City, MN 55063-4749
LE-1107	Sean Walther				Form Letter 3			2425 Ridge Ln Mounds View, MN 55112-4941
LE-1108	Patricia Dana				Form Letter 3			300 N College St Northfield, MN 55057-4000
LE-1109	James Dildine				Form Letter 3			267 Weaver St Mankato, MN 56001-4664
LE-1110	Rachel Syverson				Form Letter 3			7332 Russell Ave S Richfield, MN 55423-2863
LE-1111	Mary Kay Schladweiler				Form Letter 3			3836 13th Ave S Minneapolis, MN 55407-2734
LE-1112	Liza Timmers				Form Letter 3			11342 30th St Clear Lake, MN 55319-9788
LE-1113	S Wilkie				Form Letter 3			14813 Judicial Rd Burnsville, MN 55306-4867
LE-1114	Lori Andresen				Form Letter 3			3025 E Superior St Duluth, MN 55812-2355
LE-1115	Michael Ginsburg				Form Letter 3			81431 490th St # T Hector, MN 55342-2016
LE-1116	Stephanie Day				Form Letter 3			638 Oakwood Dr Shoreview, MN 55126-4793
LE-1117	Anna Arbisi				Form Letter 3			2327 E Franklin Ave Minneapolis, MN 55406-1795
LE-1118	John Kluge				Form Letter 3			1833 Crestview Dr New Ulm, MN 56073-3726
LE-1119	Todd Hedman				Form Letter 3			4628 41st Ave N Robbinsdale, MN 55422-1803
LE-1120	gary surber				Form Letter 3			794 Laurel Ave Saint Paul, MN 55104-7107

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1121	Kristina Coles				Form Letter 3			3814 20th Ave S Minneapolis, MN 55407-2906
LE-1122	Obrey Lojovich				Form Letter 3			455 14th Ave S South St Paul, MN 55075-2130
LE-1123	Scott Thomsen				Form Letter 3			469 W Eagle Lake Dr Maple Grove, MN 55369-5528
LE-1124	James & Sara Conway				Form Letter 3			4620 Valley Dr NW Rochester, MN 55901-6508
LE-1125	Robert Palmer				Form Letter 3			163 Outer Dr Le Sueur, MN 56058-2125
LE-1126	Anna Jane Joyner				Form Letter 3			3508 Dupont Ave S Apt 9 Minneapolis, MN 55408-4011
LE-1127	Brent Pearson				Form Letter 3			608 Le Hillier St Mankato, MN 56001-1842
LE-1128	Clif Ware				Form Letter 3			2407 39th Ave NE Unit 31 Minneapolis, MN 55421-4220
LE-1129	Thomas Herrmann				Form Letter 3			854 Oriole Ln Chaska, MN 55318-1132
LE-1130	Christopher Melander				Form Letter 3			214 Fairview Ave S Saint Paul, MN 55105-1550
LE-1131	Craig Poorker				Form Letter 3			3711 York Ave N Robbinsdale, MN 55422-2312
LE-1132	Jonathan Carlson				Form Letter 3			2921 Fish Hatchery Rd Apt 210 Fitchburg, WI 53713-3132
LE-1133	Dan Burns				Form Letter 3			503 10th Ave S Princeton, MN 55371-2124
LE-1134	Karl Knutsen				Form Letter 3			P. O. Box 6385 Minneapolis, MN 55406-0385
LE-1135	Jessica Tatro				Form Letter 3			5624 41st Ave S Minneapolis, MN 55417-2926
LE-1136	Vicki Herrmann				Form Letter 3			PO Box 171 Brownton, MN 55312-0171
LE-1137	Janet Lenius				Form Letter 3			910 Main St NE Minneapolis, MN 55413-1934

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1138	Jeremy Loechler				Form Letter 3			107 Pond St N Mankato, MN 56001-1827
LE-1139	John Kammer				Form Letter 3			8451 Carriage Hill Bay Savage, MN 55378-2339
LE-1140	Lois Jech				Form Letter 3			9401 Yosemite Rd Bloomington, MN 55437-1921
LE-1141	M Digatono				Form Letter 3			10645 Boundary Creek Ter Maple Grove, MN 55369-2617
LE-1142	Ronald Falk				Form Letter 3			4740 Merilee Dr Minnetonka, MN 55343-8764
LE-1143	Ed Salter				Form Letter 3			1540 Como Ave Saint Paul, MN 55108-2543
LE-1144	Kim Fishburn				Form Letter 3			1545 Black Oaks Ln N Plymouth, MN 55447-2856
LE-1145	Dale Anania				Form Letter 3			1819 Curtis St Berkeley, CA 94702-1617
LE-1146	Donna Butler				Form Letter 3			8438 Mississippi Blvd NW Coon Rapids, MN 55433-5940
LE-1147	Mary Janet Schloff				Form Letter 3			7618 York Ave S Apt 1119 Minneapolis, MN 55435-5263
LE-1148	Arlene Roth				Form Letter 3			32666 County 51 Blvd Red Wing, MN 55066-4729
LE-1149	Gib Ahlstrand				Form Letter 3			50 Barton Ave SE Minneapolis, MN 55414-3512
LE-1150	Merrimon & Carol Hipp				Form Letter 3			15512 Almond Ln Eden Prairie, MN 55347-2554
LE-1151	Joanne Neihart				Form Letter 3			6751 Geneva Ave S Cottage Grove, MN 55016-1019
LE-1152	Jamila Hakam				Form Letter 3			415 Ridgewood Ave Apt 1 Minneapolis, MN 55403-3569
LE-1153	Russell Smiley				Form Letter 3			7455 France Ave S # 415 Edina, MN 55435-4702
LE-1154	Mita Bell				Form Letter 3			2450 W 24th St Minneapolis, MN 55405-2321



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1155	Humphrey Kearns				Form Letter 3			6282 State 26 La Crescent, MN 55947-8763
LE-1156	Deborah Walsh				Form Letter 3			1124 2nd St N Stillwater, MN 55082-4989
LE-1341	Shaun O'keefe				Form Letter 1			4305 Columbus Ave Minneapolis, MN 55407
LE-1342	Margie & David Back				Form Letter 1			6846 Forestry Rd Lake Nebagamom, WI 54849
LE-1343	Jeff L. Pykkonen				Form Letter 1			719 West 6th Street Duluth, MN 55806
LE-1344	Steven Steele				Form Letter 1			7451 Dallas Ct N Maple Grove, MN 55311
LE-1345	Ann Marie				Form Letter 1			15555 Flight Way St Paul, MN 55124
LE-1346	Jim Miller				Form Letter 1			10870 Artesian Ln Woodbury, MN 55129
LE-1347	Jeannie Quillen				Form Letter 1			36002 Fox Hunter Rd Pequot Lakes, MN 56472
LE-1348	Kay Koelkerwestby				Form Letter 1			308 1st St. N. E. Buffalo, MN 55313
LE-1349	Brent Gurtek				Form Letter 1			1873 Korkki Road Duluth, MN 55804
LE-1350	Kristi Kraling				Form Letter 1			28681 Co. 16 Preston, MN 55965
LE-1351	Candyce Osterkamp				Form Letter 1			1692 Idaho Ave. E. St. Paul, MN 55106
LE-1352	Shar Bjerke				Form Letter 1			9873 7th Street NE Blaine, MN 55434
LE-1353	Shar Bjerke				Form Letter 1			9873 7th Street NE Blaine, MN 55434
LE-1354	Pam Videen				Form Letter 1			13828 Flay Avenue N Hugo, MN 55038
LE-1355	Pauline Wahlquist				Form Letter 1			10979 State Hwy 23 Brook Park, MN 55007-4726
LE-1356	Levi Martfeld				Form Letter 1			150 2nd Street NE Apt 106 Minneapolis, MN 55413
LE-1357	Diane Jankord				Form Letter 1			1430 West 280th Street New Prague, MN 56071

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1157	Kristi Dietz				Form Letter 3			3547 Buchanan St NE Minneapolis, MN 55418-1406
LE-1158	Shelly Cartmell				Form Letter 3			4431 Bloomington Ave Minneapolis, MN 55407-3658
LE-1159	Sharon & Phil Baumel				Form Letter 3			2239 Langdon Ln Mound, MN 55364-1409
LE-1160	Steve Wentworth				Form Letter 3			4313 Clemson Cir Eagan, MN 55122-4818
LE-1161	Jon Grinnell				Form Letter 3			904 S 4th St Saint Peter, MN 56082-1423
LE-1162	Phillip Kelly				Form Letter 3			7321 12th Ave S Richfield, MN 55423-3344
LE-1163	Donald Bry				Form Letter 3			1101 W 28th St Apt 311 Minneapolis, MN 55408-2007
LE-1164	Lori Ann Crowley				Form Letter 3			1395 Eleanor Ave Saint Paul, MN 55116-2230
LE-1165	Russell Nynas				Form Letter 3			9118 Pinehurst Rd Woodbury, MN 55125-8829
LE-1166	Juliann Rule				Form Letter 1			35002 115th Avenue Avon, MN 56310
LE-1167	Robert Bullis				Form Letter 1			19088 Dodge Street NW Elk River, MN 55330
LE-1168	Paul Ryals				Form Letter 1			6529 44th Avenue North Crystal, MN 55428
LE-1169	Gail Jacobson				Form Letter 1			1747 Carl St St Paul, MN 55113
LE-1170	Elizabeth Mullen				Form Letter 1			3419 Elliot Avenue South Minneapolis, MN 55407
LE-1171	John Reutter				Form Letter 1			2951 Trillium Ct E Aurora, IL 60506
LE-1172	James Koschak				Form Letter 1			1329 East Harvey Ely, MN 55731
LE-1173	Sharon Magliulo				Form Letter 1			821 E. Pattison St. Ely, MN 55731
LE-1174	Kurt Seaberg				Form Letter 1			2000 Seabury Av. Minneapolis, MN 55406

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1175	Richard Huey				Form Letter 1			351 E. Arch St. Marquette, MI 49855
LE-1176	Mike Harmon				Form Letter 1			4200 Walnut St. West Des Moines, IA 50265
LE-1177	Rob Thomas				Form Letter 1			2740 Nelson Rd Delano, MN 55328
LE-1178	Shelli Burns				Form Letter 1			3916 Monterey Ave. St. Louis Park, MN 55416
LE-1179	Dean Einerson				Form Letter 1			706 High Street Duluth, MN 55805
LE-1180	Kevin Koschak				Form Letter 1			2384 151st Ave NW street 2
LE-1181	John Mowery				Form Letter 1			6034 Upton Ave S Minneapolis, MN 55410
LE-1182	Jon Damon				Form Letter 1			10932 Beard Ave South Bloomington, MN 55431
LE-1183	John Schmitt				Form Letter 1			5101 Park Avenue Minneapolis, MN 55417
LE-1184	Richard Olson				Form Letter 1			45 University Ave SE Unit 610 Minneapolis, MN 55414
LE-1185	Rob Winnick				Form Letter 1			3116 West Lake St Apt 423 Minneapolis, MN 55416
LE-1186	Jeff Pierce				Form Letter 1			5500 Pillsbury Ave S Minneapolis, MN 55419
LE-1187	Lynn Thomasberg				Form Letter 1			3523 Fremont Ave S Minneapolis, MN 55408
LE-1188	James Herther				Form Letter 1			1585 Cohansey # 201 St Paul, MN 55117
LE-1189	Ryan Anderson				Form Letter 1			1212 Washington Memorial Drive Apt 208 St.Cloud, MN 56301
LE-1190	Judy Nelson				Form Letter 1			54 Helberg Road Esko, MN 55733-9742
LE-1191	Andrew Marolt				Form Letter 1			110 W Conan St Ely, MN 55731
LE-1192	Carolyn Clements				Form Letter 1			601 Sunset Dr. Minnetonka, MN 55305

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1193	Terry Hokenson				Form Letter 1			3352 Prospect Ter SE Minneapolis, MN 55414
LE-1194	Janice Tarnow				Form Letter 1			2114 Glenview Ln NE Rochester, MN 55906
LE-1195	Mimi Jennings				Form Letter 1			2222 Hillside St Paul, MN 55108
LE-1196	Frank Jeff Verito				Form Letter 1			350 1/2 East Ridge Street Marquette, MI 49855
LE-1197	Melinda Suelflow				Form Letter 1			5881 Nikolai Road Finland, MN 55603
LE-1198	Gregory Stricherz				Form Letter 1			5735 Washburn Avenue South Minneapolis, MN 55410
LE-1199	Kasey Hutchinson				Form Letter 1			606 S Third Marquette, MI 49855
LE-1200	Eeva Miller				Form Letter 1			701 W. Hampton St. Marquette, MI 49855
LE-1201	Chris Haenisch				Form Letter 1			505 54th Ave NE Fridley, MN 55421
LE-1202	Dale Hadler				Form Letter 1			PO Box 6397 Minneapolis, MN 55406
LE-1203	Angela Anderson				Form Letter 1			1121 North 4th Street Stillwater, MN 55082
LE-1204	Christine Hoffman				Form Letter 1			950 Country Road 88 SW Alexandria, MN 56308
LE-1205	Rosa Musket				Form Letter 1			East Prospect Marquette, MI 49855
LE-1206	Angela Powers				Form Letter 1			127 Nina Street St Paul, MN 55102
LE-1207	Cheryl Storm				Form Letter 1			6068 Murphy Lake Road Brimson, MN 55602
LE-1208	linda rulison				Form Letter 1			
LE-1209	Michelle Hesterberg				Form Letter 1			300 N. College St. Northfield, MN 55057
LE-1210	Jsusan Mullin				Form Letter 1			8311 Fairfield Rd Brooklyn Park, MN 55444

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1211	Kelley Meister				Form Letter 1			2427 Chicago Ave Minneapolis, MN 55404
LE-1212	Barbara Pumper				Form Letter 1			27404 Scenic Byway Road Belle Plaine, MN 56011
LE-1213	Karl Knutsen				Form Letter 1			P. O. Box 6385 Minneapolis, MN 55406-0385
LE-1214	Alison Edgerton				Form Letter 1			2009 Hogans Island Drive NW Backus, MN 56435
LE-1215	Clair Lynn Mcguigan				Form Letter 1			39579 Arrowhead Drive Pine River, MN 56474
LE-1216	Clair Lynn Mcguigan				Form Letter 1			39579 Arrowhead Drive Pine River, MN 56474
LE-1217	David Butcher				Form Letter 1			3998 67th St SW Pequot Lakes, MN 56472
LE-1218	Joan Ellison				Form Letter 1			20740 410th St Pelican Rapids, MN 56572
LE-1219	Marcia Thurmer				Form Letter 1			29184-396th Place
LE-1220	Blake Durtsche				Form Letter 1			1702 Washington St. Apt 102 San Francisco, CA 94109
LE-1221	Brook Bernini				Form Letter 1			870 W Alameda St Tucson, AZ 85745
LE-1222	Andrea Wolmutt				Form Letter 1			1134 Pine Mtn. Lk. Rd. NW Backus, MN 56435
LE-1223	Michael Shomsky				Form Letter 1			3937 20th Ave S Minneapolis, MN 55407
LE-1224	Cat Thompson				Form Letter 1			PO Box 7851 St. Paul, MN 55107
LE-1225	Jerome Comeau				Form Letter 1			3316 Emerson Ave S Minneapolis, MN 55408
LE-1226	Richard Schubert				Form Letter 1			4754 Chicago Bay Road Hovland, MN 55606
LE-1227	Thomas Doyle				Form Letter 1			9800 28th Ave N Plymouth, MN 55441
LE-1228	Chad Debaker				Form Letter 1			4147 26th Ave South Minneapolis, MN 55406



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1229	Charles S Wilson				Form Letter 1			8421 22nd Ave S Bloomington, MN 55425-1819
LE-1230	Aleen Starkweather				Form Letter 1			20 North Eliot Ave., Apt. 32 Rush City, MN 55069
LE-1231	Danielle Taylor				Form Letter 1			862 Smith Ave. S. St. Paul, MN 55107
LE-1232	Charlotte Loonsfoot				Form Letter 1			415 Spruce St Baraga, MI 49908
LE-1233	James And Judith Arnol				Form Letter 1			8822 West River Rd Brooklyn Park, MN 55444
LE-1234	Kimberly Nieman				Form Letter 1			4550 Orchid Circle Plymouth, MN 55446
LE-1235	Grant Gravdahl				Form Letter 1			PO Box 303 Pequot Lakes, MN 56472
LE-1236	Mary Suelflow				Form Letter 1			508 Jewett Street Marshall, MN 56258
LE-1237	Steve Suelflow				Form Letter 1			508 Jewett St. Marshall, MN 56258
LE-1238	Grant Gravdahl				Form Letter 1			PO Box 303 Pequot Lakes, MN 56472
LE-1239	Andrew Thiel				Form Letter 1			1835 Ulysses St NE apt 6 Minneapolis, MN 55418
LE-1240	Catherine ChaykaCather				Form Letter 1			1590 Long Lake Rd New Brighton, MN 55112
LE-1241	Peter Boisclair				Form Letter 1			620 Oak Park Lane Hopkins, MN 55343
LE-1242	Dennis A. Bloomquist				Form Letter 1			219 West Kent Road Duluth, MN 55812
LE-1243	Clair Lynn Mcguigan				Form Letter 1			39579 Arrowhead Drive Pine River, MN 56474
LE-1244	Heather Kachel				Form Letter 1			1184 Mackubin st apt 103 Saint Paul, MN 55117
LE-1245	Melis Arik				Form Letter 1			28 Conan St Ely, MN 55731
LE-1246	James Koschak				Form Letter 1			1329 East Harvey Ely, MN 55731
LE-1247	Kevin Koschak				Form Letter 1			2384 151st Ave NW street 2

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1248	Thomas Krumme				Form Letter 1			901 2nd St. NE #205 Minneapolis, MN 55413
LE-1249	Molly Uvaas				Form Letter 1			901 2nd St. NE #205 Minneapolis, MN 55413
LE-1250	Lauren Brady				Form Letter 1			1912 3rd Avenue South Minneapolis, MN 55404
LE-1251	Jake Staum				Form Letter 1			7458 Concerto Curve Fridley, MN 55432
LE-1252	Michele Nihipali				Form Letter 1			54-074 A Kam Hwy Hauula, HI 96717
LE-1253	James And Sara Conwa				Form Letter 1			4620 Valley DR NW Rochester, MN 55901
LE-1254	Jim Mckeehen				Form Letter 1			9807 Rosemill Circle Champlin, MN 55316
LE-1255	Amanda Boegh				Form Letter 1			3923 Upper 73rd Street East Inver Grove Heights, MN 55076
LE-1256	Megan Riley				Form Letter 1			641 Jefferson Ave St Paul, MN 55102
LE-1257	Steve Jorgenson				Form Letter 1			2116 Iglehart Ave. St. Paul, MN 55104
LE-1258	Barbara Crow				Form Letter 1			1982 Lismore Rd Duluth, MN 55804
LE-1259	Mary Ann Litfin				Form Letter 1			1302 So. 1st St. Stillwater, MN 55082
LE-1260	Earl Rosenwinkel				Form Letter 1			1127 E. 6th St. Duluth, MN 55805
LE-1261	James Mickelson				Form Letter 1			4817 75th ST SE Rochester, MN 55904
LE-1262	Warner Wirta				Form Letter 1			3963 Fiskett Rd Duluth, MN 55803
LE-1263	Warner Wirta				Form Letter 1			3963 Fiskett Rd Duluth, MN 55803
LE-1264	Lelsie Pilgrim				Form Letter 1			1704 Vicki Lane mendota hts, MN 55118
LE-1265	Michelle Valadez				Form Letter 1			8577 Holland Avenue Apple Valley, MN 55124

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1266	Karen Matthew				Form Letter 1			1430 Spruce Place Apt 301 Minneapolis, MN 55403
LE-1267	Jean Schermer				Form Letter 1			2803 185th St Luck, WI 54853
LE-1268	Melvin Greene				Form Letter 1			4059 Pennsylvania Ave Eagan, MN 55123
LE-1269	Denixe Marlowe				Form Letter 1			7406 Bolton Way Inver Grove Heights, MN 55076
LE-1270	Christopher Boldt				Form Letter 1			409 Ashland Ave #6 #6
LE-1271	Michael Arnold				Form Letter 1			105 6th Avenue NW Dodge Center, MN 55927
LE-1272	Michelle Valadez				Form Letter 1			8577 Holland Avenue Apple Valley, MN 55124
LE-1273	Cat Thompson				Form Letter 1			PO Box 7851 St. Paul, MN 55107
LE-1274	Barry Cohen				Form Letter 1			1750 Ashland Ave. 1750 Ashland Ave.
LE-1275	Peter Scholtz				Form Letter 1			3136 10th Ave. S. #3 Minneapolis, MN 55407
LE-1276	Matt Johansen				Form Letter 1			10355 Greenfield Road Greenfield, MN 55357
LE-1277	James DuShane				Form Letter 1			936 8Th Ave S E Rochester, MN 55904
LE-1278	Rebecca Lucking				Form Letter 1			320 Fairmont Ave S Montrose, MN 55363
LE-1279	Jesse Lucking				Form Letter 1			320 Fairmont Ave S Montrose, MN 55363
LE-1280	Dan Iverson				Form Letter 1			4640 North Arm Drive Mound, MN 55364
LE-1281	R Reiter				Form Letter 1			1425 E 4th St duluth, MN 55805
LE-1282	Lelsie Pilgrim				Form Letter 1			1704 Vicki Lane mendota hts, MN 55118
LE-1283	Liz Lundquist				Form Letter 1			2612 Cutters Grove Ave. Apt. 206 Anoka, MN 55303

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1284	Nadya Trytan				Form Letter 1			1186 Grand Ave #12 St Paul, MN 55105
LE-1285	John Paul Roy Roy				Form Letter 1			3231 37th Ave. S Minneapolis, MN 55406-2136
LE-1286	David Johanson II				Form Letter 1			2233 Sierra Drive White Bear Lake, MN 55110
LE-1287	David Zimney				Form Letter 1			11100 Cedar Hills Blvd Apt124 Minnetonka, MN 55305
LE-1288	Lynn Lang				Form Letter 1			1721 Polaris Court Saint Cloud, MN 56303
LE-1289	Scot Kindschi				Form Letter 1			110 E Redwood St Marshall, MN 56258-1847
LE-1290	Meredith Wodrich				Form Letter 1			3236 18th Av S #2 Minneapolis, MN 55407
LE-1291	Elisabeth Johnson				Form Letter 1			510 Newton Ave SE Watertown, MN 55388-8800
LE-1292	A Bonvouloir				Form Letter 1			PO Box 70185 Sunnyvale, CA 94086
LE-1293	Chris Burda				Form Letter 1			4136 5th Ave S Minneapolis, MN 55409
LE-1294	Brinkman				Form Letter 1			
LE-1295	Marilyn Benson				Form Letter 1			1495 Raymond Ave. St. Paul, MN 55108
LE-1296	Kevin Hay				Form Letter 1			603 Dillon Ave N Montrose, MN 55363
LE-1297	Jane Clements				Form Letter 1			1335 Walsh Road Ely, MN 55731
LE-1298	Cherrie Bennethum				Form Letter 1			1421 Marion St. Saint Paul, MN 55117
LE-1299	Kathleen Moraski				Form Letter 1			7611 Teal Bay Woodbury, MN 55125
LE-1300	Alex Barbeau				Form Letter 1			5305 3rd Ave S Minneapolis, MN 55419
LE-1301	Mike Ferguson				Form Letter 1			114 Lincoln Street Mankato, MN 56001

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1302	Paul Schurke				Form Letter 1			1101 Ring Rock Road Ely, MN 55731
LE-1303	Nanette Echols				Form Letter 1			1256 James Ave St. Paul, MN 55105
LE-1304	Susan Schurke				Form Letter 1			1101 Ring Rock Road Ely, MN 55731
LE-1305	Martha Vest				Form Letter 1			63 Fairview Avenue S. st. Paul, MN 55105
LE-1306	Elizabeth Treher				Form Letter 1			8639 S Strand Lake Rd Cotton, MN 55724
LE-1307	Mark Kowaliw				Form Letter 1			2909 princeton ave st louis park, MN 55416
LE-1308	Annie Gardner				Form Letter 1			1906 1st Ave South Minneapolis, MN 55403
LE-1309	Sharon Fortunak				Form Letter 1			7120 Ivystone Ave South Cottage Grove, MN 55016
LE-1310	Gregory Mirocha				Form Letter 1			31247 Genesis Ave Stacy, MN 55079
LE-1311	Barbara Stamp				Form Letter 1			6901 W 84th St Bloomington, MN 55438
LE-1312	Larry Adams				Form Letter 1			3149 36th Avenue South Minneapolis, MN 55406
LE-1313	Paul Vitko				Form Letter 1			10587 Wellington Ln N Maple Grove, MN 55369
LE-1314	JM Digatono				Form Letter 1			10645 Boundary Creek Terrace Maple Grove, MN 55369
LE-1315	Greg Damberg				Form Letter 1			4332 Reiland Lane Shoreview, MN 55126
LE-1316	John Viacrucis				Form Letter 1			3002 17th St. S Apt. 206 Moorhead, MN 56560
LE-1317	Terry Williams				Form Letter 1			4170 Brigadoon Drive Shoreview, MN 55126-3107
LE-1318	Andrew Nesheim				Form Letter 1			694 Green St Apt 4 Cambridge, MA 02139
LE-1319	Scott Cady				Form Letter 1			5652 Pillsbury Ave South Minneapolis, MN 55419



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1320	Sarah Klette				Form Letter 1			8315 141st St. W. Apple Valley, MN 55124
LE-1321	Jeff Kitterman				Form Letter 1			11623 Adobe Tr Sauk Centre, MN 56378
LE-1322	Lisa Sharp				Form Letter 1			Dixon Road Brandon, WI 53919
LE-1323	Shirley Merkle				Form Letter 1			875 Lake Street Saint Paul, MN 55119
LE-1324	Tricia Runningen				Form Letter 1			9378 County Road 25 Houston, MN 55943
LE-1325	Barbara Clark				Form Letter 1			73 Martin Way Vadnais Heights, MN 55127
LE-1326	Mary Suelflow				Form Letter 1			508 Jewett Street Marshall, MN 56258
LE-1327	Jeff Charity				Form Letter 1			PO Box 252 South Paris, ME 04281
LE-1328	David Lien				Form Letter 1			1026 Cheyenne Villas Pt. Colorado Springs, CO 80906
LE-1329	Renee Brown				Form Letter 1			6840 Park View Lane Eden Prairie, MN 55346
LE-1330	Edward Kacura				Form Letter 1			12122 N Blacktail Rd #A Marana, AZ 85653
LE-1331	Ordell Vee				Form Letter 1			427 2nd St NE Madelia, MN 56062
LE-1332	M Richardson				Form Letter 1			1138 charles st paul, MN 55104
LE-1333	Paul Moss				Form Letter 1			1849 Whitaker St. White Bear Lake, MS 55110
LE-1334	Dan Iverson				Form Letter 1			4640 North Arm Drive Mound, MN 55364
LE-1335	Kathryn Gilje				Form Letter 1			5117 Lawton Avenue Oakland, CA 94618
LE-1336	Krissy Hughes				Form Letter 1			4399 Jenny LN NW Bemidji, MN 56601-8749
LE-1337	Christopher Norbury				Form Letter 1			2175 Sunflower Lane Owatonna, MN 55060

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1338	Ian Johnson				Form Letter 1			411 Wheeler St. N St. Paul, MN 55104
LE-1339	Carol Ashley				Form Letter 1			21134 Finch Dr Park Rapids, MN 56470
LE-1340	Alan Carlson				Form Letter 1			2301 Long Ave Saint Paul, MN 55114
LE-1358	Patricia Liquard				Form Letter 1			200 Mississippi River Blvd N #3D St Paul, MN 55104
LE-1359	Bob Bartlett				Form Letter 1			5080 Silver Lake Rd. Mounds View, MN 55112
LE-1360	Emily Dixon				Form Letter 1			6771 S Silver Hill Dr Finland, MN 55603
LE-1361	Jan Pohlen				Form Letter 1			8706 Norway St NW 8706 Norway St NW
LE-1362	Mary Lou Wilm				Form Letter 1			2919 45th Ave. S. Mpls, MN 55406
LE-1363	Clairvaux Mcfarland				Form Letter 1			1001 14th St NW Rochester, MN 55901
LE-1364	Bridget Riversmith				Form Letter 1			225 E Anoka St Duluth, MN 55803
LE-1365	Gudrun Dennis				Form Letter 1			5912 NW 26th Street Gainesville, FL 32653
LE-1366	Brent Gurtek				Form Letter 1			1873 Korkki Road Duluth, MN 55804
LE-1367	Kathy Kormanik				Form Letter 1			8609 40th Ave. N Minneapolis, MN 55427
LE-1368	Arnie Roos				Form Letter 1			2020 Nicollet Avenue Minneapolis, MN 55404
LE-1369	Mike Harmon				Form Letter 1			4200 Walnut St. West Des Moines, IA 50265
LE-1370	Brent Metzler				Form Letter 3			7239 Brunswick Ave N Brooklyn Park, MN 55429-1060
LE-1371	Marj Evans-De-Carpio				Form Letter 3			50 Maple Island Rd Burnsville, MN 55306-5500

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1372	Benjamin Krohling				Form Letter 3			3407 Harriet Ave Apt 9 Minneapolis, MN 55408-4236
LE-1373	Amy Lewis				Form Letter 3			4649 2nd Ave S Minneapolis, MN 55419-5607
LE-1374	Joel Weiss				Form Letter 3			2720 Dale St N Apt 205 Saint Paul, MN 55113-2317
LE-1375	Darrel Youngblom				Form Letter 3			1201 N Basswood Ave Duluth, MN 55811-4729
LE-1376	Vicki Johnson				Form Letter 3			5596 Dunlap Ave N Saint Paul, MN 55126-5649
LE-1377	Annie Gardner				Form Letter 3			1906 1st Ave South Minneapolis, MN 55403
LE-1378	Vicki Taylor				Form Letter 3			47742 Bowstring C Deer River, MN 56636-2497
LE-1379	Nancy Vannurden				Form Letter 3			47011 Hwy 38 Marcell, MN 56657
LE-1380	Mark Westhed				Form Letter 3			318 Marshall St Duluth, MN 55803-1937
LE-1381	Delores Levau				Form Letter 3			1020 Jefferson St S Wadena, MN 56482-1852
LE-1382	Tegwin Moye				Form Letter 3			3310 69th St E Inver Grove Heights, MN 55076-2149
LE-1383	Elizabeth Burr				Form Letter 3			2025 Fairmount Ave Saint Paul, MN 55105-1548
LE-1384	Kelly O'Brien				Form Letter 3			417 Walnut St SE Minneapolis, MN 55455-0370
LE-1385	Karen Ihli				Form Letter 3			6429 Forestview Ln N Maple Grove, MN 55369-6188
LE-1386	Anne Griffin-Lewin				Form Letter 3			3401 Central Ave NE Apt 3
LE-1387	Jeff Moses				Form Letter 3			3314 Park Ave Minneapolis, MN 55407-2018
LE-1388	Warren High				Form Letter 3			507 W 5th St Duluth, MN 55806-2439

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1389	Jennifer Rollings				Form Letter 3			10310 Providence Dr Johnston, IA 50131-4728
LE-1390	Angelina Mafio-Vzgey				Form Letter 3			2317 10th Ave S Pesci
LE-1391	James Burns				Form Letter 3			6142 Lynn Way Saint Paul, MN 55129-9508
LE-1392	Mary Zirbes				Form Letter 3			3200 15th St N Apt 234 Saint Cloud, MN 56303-1635
LE-1393	MaryBeth Garrigan				Form Letter 3			735 Broadway Ave Wabasha, MN 55981-1615
LE-1394	Marilee Lampman				Form Letter 3			140 Fairview Ln Red Wing, MN 55066-1912
LE-1395	Madeline Studer				Form Letter 3			170 Good Counsel Dr Mankato, MN 56001-3138
LE-1396	Heather Ellner				Form Letter 3			1043 Osceola Ave Saint Paul, MN 55105-3235
LE-1397	Wanda Barchus				Form Letter 3			1300 24th Ave NW Backus, MN 56435-3030
LE-1398	Amanda Lane				Form Letter 3			14500 34th Ave N Plymouth, MN 55447-5212
LE-1399	Barb Collier				Form Letter 3			Box 249 Bon Accord, MN 56123
LE-1400	Jan Olsen Stone				Form Letter 3			1411 Portland Ave Saint Paul, MN 55104-6812
LE-1401	michael antus				Form Letter 3			44941 327th Ln Aitkin, MN 56431-4659
LE-1402	Jan Olsen Stone				Form Letter 3			1411 Portland Ave Saint Paul, MN 55104-6812
LE-1403	Mikanuk "Larry D. Ada				Form Letter 3			3149 36th Ave S Minneapolis, MN 55406-2126
LE-1404	Robin Grinnell				Form Letter 3			506 S Washington Ave Saint Peter, MN 56082-2027
LE-1405	Tammy Meyer				Form Letter 3			3140 Chowen Ave S Apt 22 Minneapolis, MN 55416-4533
LE-1406	Judith Rosenblatt				Form Letter 3			2225 Draper Ave Roseville, MN 55113-5312

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1407	Nicholas Snavely				Form Letter 3			805 17th St SE Saint Cloud, MN 56304-2125
LE-1408	Erica Narveson				Form Letter 3			Frontier Hall Minneapolis, MN 55455
LE-1409	Elizabeth Oehler				Form Letter 3			215 E Nevada St Ashland, OR 97520-1025
LE-1410	Roy Cloutier				Form Letter 3			1231 Atwood Ln Stillwater, MN 55082-6380
LE-1411	Heather Kachel				Form Letter 3			1184 Mackubin st apt 103 Saint Paul, MN 55117
LE-1412	John & Nancy O'Brien				Form Letter 3			2103 Cohansey Blvd Roseville, MN 55113-6629
LE-1413	Lane Lucht				Form Letter 3			4011 Pokegama Lake Rd Grasston, MN 55030-2158
LE-1414	Nancy Welharticky				Form Letter 3			104 Gardner St Arlington, MA 02474-3809
LE-1415	Paul Dahlen				Form Letter 3			10255 Jamaca Ave N Saint Paul, MN 55115-1351
LE-1416	Paula Hess				Form Letter 3			128 Banks Blvd Silver Bay, MN 55614-1222
LE-1417	Donald Hughes				Form Letter 3			11807 Crawford Rd W Hopkins, MN 55343-8814
LE-1418	Richard Hjort				Form Letter 3			9506 270th St Chisago City, MN 55013-7315
LE-1419	Joline Gitis				Form Letter 3			1517 E River Pkwy Minneapolis, MN 55414-3626
LE-1420	Mary Boranian				Form Letter 3			6416 Birchmont Dr NE Bemidji, MN 56601-8636
LE-1421	Boise Jones				Form Letter 3			1101 W Broadway Ave Minneapolis, MN 55411-2570
LE-1422	Michael Johnson				Form Letter 3			748 Cable Bay Road Rd 1
LE-1423	Patrick O'Boyle				Form Letter 3			1849 Narvik Ct Eagan, MN 55122-2685
LE-1424	Rich Femling				Form Letter 3			1946 Tatum St Saint Paul, MN 55113-5442



Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1425	Paul Moss				Form Letter 3			1849 Whitaker St. White Bear Lake, MS 55110
LE-1426	Patricia Jones				Form Letter 3			515 State St W Cannon Falls, MN 55009-1933
LE-1427	Ordell Vee				Form Letter 3			427 2nd St NE Madelia, MN 56062
LE-1428	George Burtness				Form Letter 3			1863 Saint Clair Ave Saint Paul, MN 55105-1642
LE-1429	A Richard & Martha Ols				Form Letter 3			45 University Ave SE Unit 610 Minneapolis, MN 55414-1196
LE-1430	John Crowley				Form Letter 3			1395 Eleanor Ave Saint Paul, MN 55116-2230
LE-1431	Penny Kinney				Form Letter 3			2016 3rd Ave NE Austin, MN 55912-4107
LE-1432	David Zimney				Form Letter 3			11100 Cedar Hills Blvd Apt124 Minnetonka, MN 55305
LE-1433	Penny Myers				Form Letter 3			5805 Columbus Ave Minneapolis, MN 55417-3105
LE-1434	Michael Kennedy				Form Letter 3			6020 187th Ave NW Anoka, MN 55303-9694
LE-1435	Mary Gleason				Form Letter 3			4133 Washburn Ave S Minneapolis, MN 55410-1145
LE-1436	Richard Mammel				Form Letter 3			1209 Birch Hill Dr Albert Lea, MN 56007-1802
LE-1437	Thomas Flynn				Form Letter 3			13742 Inglewood Ave Savage, MN 55378-2078
LE-1438	Dave Jeanson				Form Letter 3			17965 Jubilee Way Apt C Lakeville, MN 55044-5120
LE-1439	Alejandro Sanchez-Aizc				Form Letter 3			301 E Marshall St Marshall, MN 56258-1841
LE-1440	Ariel Kirst				Form Letter 3			2040 Inca Ln New Brighton, MN 55112-3136
LE-1441	Ayers Bagley				Form Letter 3			2107 Kenwood Pkwy Minneapolis, MN 55405-2327

Submission Number	Full Name	Affiliation/Organization	SubmissionDate	Source	Form Letter	Number of Comments	Issues Raised	Mailing List Information
LE-1442	Gordon Kircher				Form Letter 3			1370 Quant Ave S Lakeland, MN 55043-9437
LE-1443	Cat Murck				Form Letter 3			4250 14th Ave S Minneapolis, MN 55407-3224
LE-1444	Jason Bender				Form Letter 3			2507 Emerson Ave S Apt 2 Minneapolis, MN 55405-3551
LE-1445	Joe Totall				Form Letter 3			4424 Garfield Ave Minneapolis, MN 55419-4847
LE-1446	Scott Dulas				Form Letter 3			5311 Greenwood Rd Duluth, MN 55804-2931
LE-1447	Ginger Sandes				Form Letter 3			16300 227th Ave NW Elk River, MN 55330-9514
LE-1448	Jon Damon				Form Letter 3			10932 Beard Ave South Bloomington, MN 55431
LE-1449	Bradley Schmidt				Form Letter 3			17 13th St NE Faribault, MN 55021-3813
LE-1450	John Nienstadt				Form Letter 3			4125 Snelling Ave Minneapolis, MN 55406-3341
LE-1451	David Nelson				Form Letter 3			2574 4th Ave E Saint Paul, MN 55109-3023

**Polyment Mine Land Exchange  
Scoping Comments  
Details  
May 2011**

## AIR      Air Quality and Noise

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**Comment Number** LE 282-61

**Commenter Name** Paula Maccabee

**Comment**      ☐ Impacts of discharge of sulfates to water and air, discharge of mercury to water and air, wetlands disruption, and hydrological change on increases in methylmercury in fish, including consequences for piscivorous wildlife and for human health, including the health of infants, children and subsistence fishing communities;  
☐ Impacts of sulfate discharge on waters with natural stands of wild rice, including potential violations of water quality standards and impacts on water quality, wildlife and fish habit and Tribal resources as a result of such impacts;

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**Comment Number** LE 282-63

**Commenter Name** Paula Maccabee

**Comment**      ☐ Impacts on air quality, including diesel, air toxics, particulates, asbestos-like fibers, and mercury emissions as related to human cancer and non-cancer health consequences and impacts to regional haze, particularly in the Boundary Waters Canoe Area Wilderness;

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**Comment Number** LE 315-14

**Commenter Name** Kevin Reuther

**Comment**      • Haze and air quality impacts  
• Noise

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**Comment Number** LE 340-4

**Commenter Name** John Reed

**Comment**      The SDEIS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities.

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**Comment Number** LE 356-12

**Commenter Name** Kristin Henry

**Comment**      The cost-benefit analysis should include the entire geographical area that this proposed project will impact. For instance, the air pollution from this project will impact Class I areas, such as the Boundary Waters Canoe Area Wilderness, which will suffer a 5% visibility impact for 23 days a year. This impact could jeopardize Minnesota's ability to comply with its Regional Haze State Implementation Plan. See Friends of the Boundary Waters Wilderness Scoping Comments. The agency should balance all of the costs associated with the project to determine if it is beneficial to move forward with the proposed exchange.

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**Comment Number** LE 433-2

**Commenter Name** Anne Stewart Uehling

**Comment**      I live in Ely and my children and grandchildren and I canoe in many parts of the BWCAW. This land exchange would lessen our appreciation of p points south of Ely, particularly Parent Lake as we would be driving through mining territory. I suspect it would also create noise in the peripheral areas of the BWCAW with noise by heavy equipment and dynamite explosions.

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## AIR      Air Quality and Noise

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**Comment Number** LE 627-14

**Commenter Name** Betsy Daub

**Comment** Air Resources

The proposed land exchange does not directly contribute impacts to air resources, but the consequence of losing this land from public ownership is the development of a mine with identified air quality impacts. These impacts need to be fully analyzed and understood by the Forest Service and the public in assessing the merits of the exchange.

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**Comment Number** LE 627-15

**Commenter Name** Betsy Daub

**Comment**

The federal lands within the proposed exchange are located within 300 km of four Class I regions. Under the Clean Air Act, Class I airsheds were established as areas where emissions of particulate matter and sulfur dioxide are to be restricted. Class I areas include federal wilderness areas exceeding 500 acres and national parks. These are places that are allowed only the smallest incremental pollution levels above baseline conditions. The four Class I areas within the vicinity of this project are the Boundary Waters Canoe Area Wilderness, Rainbow Lakes Wilderness, Voyageurs National Park, and Isle Royale National Park.

The emissions modeling described in the DEIS for the NorthMet project, show this project contributing 30 tons per year (tpy) of SO<sub>2</sub>, 159 tpy of NO<sub>x</sub> and 1,175 tpy of PM<sub>10</sub>. These emissions would come primarily from crushing and grinding ore, handling reagents and materials and the flotation and hydrometallurgical processing (DEIS pg. 4.6-53 and 54). The DEIS acknowledges that these emissions will cause visibility impairment for as much as 23 days a year in the Boundary Waters Canoe Area Wilderness. The NorthMet project may result in a 5% visibility impact in the BWCAW for 23 days a year, and as much as a 10% impact for one day a year (DEIS pg. 4.6-37).

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## AIR      Air Quality and Noise

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**Comment Number** LE 627-16

**Commenter Name** Betsy Daub

**Comment** This is not an insignificant level of impairment from a single project. The Minnesota Regional Haze State Implementation Plan (SIP) is a plan developed by the Minnesota Pollution Control Agency as required by the Regional Haze Rule of 1999. The goal of the SIP is to reduce haze in Class I areas affected by Minnesota emissions, and to reach natural visibility conditions by 2064. The SIP was submitted to the EPA for review on December 30, 2009. The Haze SIP notes that a 5% or more contribution to visibility impairment from an entire state would be considered significant. The NorthMet project, as described in the DEIS, would contribute a 5% visibility impairment for as many as 23 days, and a 10% impairment for one day per year.

Emissions contributions of this level are keeping Minnesota from making progress toward the goals outlined in the SIP. Even the DEIS concedes that the state is not likely to reach the visibility goals. "Current MPCA estimates indicate that emission reductions at power generation facilities and additional reasonably foreseeable projects in northeastern Minnesota are not enough to meet the current Regional Haze SIP goals" (DEIS pg. 4.6-54). The air visibility quality in the BWCAW shows a trend of becoming worse, not better. Between 1992 and 2006, visibility in the wilderness on the 20% worst days showed a worsening trend. The NorthMet project will add to the downward trend for air visibility quality over Minnesota's Class I Areas and impede reaching the goal of natural visibility conditions by 2064 as the Regional Haze Rule requires.

Within the DEIS, mitigation measures are discussed, but many eliminated from further discussion without explanation. The DEIS mentions the use of low-NOx burners in the heaters, the conversion to electric heating, and the use of waste heat for work space heating requirements. But each of these was eliminated and excluded from modeling. Missing are explanations for why these measures were found to be "infeasible or non-viable" for the project.

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**Comment Number** LE 627-17

**Commenter Name** Betsy Daub

**Comment** The DEIS also fails to adequately evaluate the cumulative effects on air quality of the NorthMet project when combined with foreseeable projects. Not included in the analysis are the impacts from on-going and future hardrock mineral exploration in and near the Superior National Forest. Nonferrous mines in advanced stages of exploration and development (including projects by Duluth Metals and Franconia Minerals) were not evaluated for their impacts to air quality and visibility. The tribal cooperating agencies highlight the failure to include "any emissions from the Keetac Expansion Project which plans to increase production by 61% by reopening another furnace line" and "the Essar Steel Expansion project that is planned" (Tribal Cooperating Agencies, DEIS pg. 4.6-44).

The U.S. EPA also objected to the failure of the DEIS to examine cumulative impacts from foreseeable projects in an August 2009 letter, but the omission remained unaddressed.

"In order to accurately assess cumulative impacts of the proposed project, including those impacts to Class I and Class II areas, the DEIS air quality analyses...should consider all current and reasonably foreseeable projects occurring in the area. The air quality modeling analyses do not include a comprehensive inventory of existing and planned sources impacting regional air quality. In particular, the analysis does not appear to include the proposed Mesaba Energy power plant, the Mesabi Nugget Phase II projects, or the Keetac Expansion project...We recommend revising the air quality analysis to include all reasonably foreseeable projects in the area" (U.S. EPA August 2009).

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## AIR      Air Quality and Noise

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**Comment Number** LE 627-18

**Commenter Name** Betsy Daub

**Comment** Recommendation:

The land exchange is an integral component in a mining project with identified significant air impacts to the Boundary Waters Canoe Area Wilderness and other public Class I airsheds. In assessing whether an exchange is in the best interests of the public and for the air resources over public lands, the Forest Service will need to examine potential impacts to air resources from the mine project. The additional analysis within the SDEIS need to be fully understood before any benefits or costs of this proposed exchange can be satisfactorily known. The Forest Service will need to assess proposed mitigation measures and determine if they adequately address the air pollution problems. Air impacts should include a full cumulative impacts assessment. The exchange and the subsequent mine need to be assessed for impacts in meeting the Regional Haze goals. The analysis should examine if the exchange meets the Forest Plan Goal of protecting and restoring air resources.

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## ALT Alternatives for Consideration

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**Comment Number** LE 063-6

**Commenter Name** Kristin Larsen

**Comment** Without this exchange, the proposed mining could still occur in the mineral deposit – but it might be more labor intensive and expensive. The surface would need to be made whole in a short period of time. If the company walks away from the project because it won't mine under the protections of the Weeks act, the minerals will remain for our nation's use at a time in the future when it can be performed in a cost effective manner that will not require a violation of the Weeks Act. It is unlikely that the minerals will lose value over time.

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**Comment Number** LE 249-6

**Commenter Name** Darren Vogt

**Comment** Although tile federal land in the proposed land exchange is one contiguous area, the non-federal lands to be acquired are in five different tracts. Further, many of these tracts consist of a number of parcels, resulting in even smaller portions of non-federal land as part of the exchange.

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**Comment Number** LE 260-1

**Commenter Name** Mike Schelmeske

**Comment** Land on Cascade River owned by realtor  
Creek thru property runs into Cascade River  
Concerned about development & fragmentation  
Consider mid to upper portion of Cascade River  
Would like to see extension of SHT

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**Comment Number** LE 277-3

**Commenter Name** Nancy Schuldt

**Comment** The FA seems to assume that open pit mining is the only feasible method of extracting the minerals in at the site, which echoes the company's consistent position that underground mining would not be economically viable. Tribal cooperating agencies provided comments on the October 2009 DEIS related to the elimination of underground mining as an alternative without sufficient analysis or justification. Cross-sections in the DEIS showing the distribution of ore by depth (Figure 4.1-2) indicate that there are substantial ore reserves at depths that likely could not be accessed by the proposed open-pit mine.

According to the U.S. Forest Service, open pit mining is prohibited by the existing deed restrictions on the property; in fact, they are the driving factor for the land exchange. However, the development of an underground mine at this site would eliminate the need for a land exchange, in addition to drastically reducing the ecological impacts of the project. The Band expects that a serious analysis of the technical feasibility of underground mining at this site be conducted as part of the NEPA process, as the cost of an alternative is not sufficient to exclude an alternative from environmental analysis.

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## ALT Alternatives for Consideration

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**Comment Number** LE 280-2

**Commenter Name** Esteban Chiriboga

**Comment** The FA document is written with the assumption that open pit mining is the only feasible method of extracting the minerals in at the site. The October 2009 DEIS eliminated underground mining as an alternative without sufficient analysis or justification. GLJFWC comments on the DEIS pointed out that, U.S. Steel recommended underground mining for the NorthMet deposit based on the Siegel and Ericson Copper Nickel Study. In addition, cross-sections in the DEIS that show the distribution of ore by depth (Figure 4.1-2), indicate that there are substantial ore reserves at depths that likely could not be accessed by open-pit mining.

The FA clearly states that the Superior National Forest position is that open pit mining is prohibited by the existing deed restrictions on the property. These deed restrictions are the driving factor for the land exchange. However, the development of an underground mine at this site would eliminate the need for a land exchange in addition to drastically reducing the ecological impacts of the project. We hope that a serious analysis of the technical feasibility of underground mining at this site be conducted as part of the NEPA process. We note that under NEPA, the cost of an alternative is not sufficient to exclude an alternative from environmental analysis.

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**Comment Number** LE 282-4

**Commenter Name** Paula Maccabee

**Comment** In order to comply with the Federal Land Management and Policy Act ("FLMPA") and the National Environmental Policy Act ("NEPA"), the SDEIS for the PolyMet Land Exchange must provide detailed evaluation of existing conditions and resources on the Federal and non-Federal estates and then evaluate all impacts of the proposed Land exchange, including the proposed use of the Federal land. The SDEIS must include environmental impacts of the proposed PolyMet open pit mine and related processing activities as well as the potential for future mineral exploitation on the balance of the Federal lands. The SDEIS must analyze both a no action alternative that would preclude the PolyMet open pit mine and analyze cumulative impacts of the proposed PolyMet Land Exchange and other current and future mining developments impacting watersheds, air sheds, habitats and endangered species. The analysis must describe impacts on management objectives for adjacent and downstream national forest lands and Indian trust lands. If the SDEIS were completed with appropriate depth and integrity, WaterLegacy believes it could not support a determination that the PolyMet Land Exchange is in the public interest.

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**Comment Number** LE 282-44

**Commenter Name** Paula Maccabee

**Comment** The SDEIS must evaluate the no action alternative and potential adverse impacts of the PolyMet Land Exchange at several levels of intensity, including implementation of the proposed PolyMet Project, implementation of the PolyMet Project and additional future mining on the 6,650 Federal acres and cumulative impacts of these mining uses and other activities affecting the watershed, air shed, habitats, species and other resources impacted by the PolyMet Land Exchange.

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## ALT Alternatives for Consideration

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**Comment Number** LE 283-9

**Commenter Name** Margaret Watkins

**Comment** The ecological costs of open-pit mining and above-ground disposal of tailings and waste rock are immense. Therefore, whether or not a land exchange occurs, significant additional study of the underground mining alternative is mandated. PolyMet's 2003 filing with the Securities and Exchange Commission includes a study of this particular deposit that was performed by the prior owner of the site, U.S. Steel, actually recommended underground mining.' By examining cross-sections showing the distribution of ore by depth, it appears that there are substantial ore reserves at depths that likely could not be accessed by the proposed open-pit mine.

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**Comment Number** LE 283-15

**Commenter Name** Margaret Watkins

**Comment** There must be significant additional study of the underground mining alternative in the SEIS.

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**Comment Number** LE 305-15

**Commenter Name** Maureen Johnson

**Comment** SNF also should consider leasing the land among the alternatives, since a landholder will pay much more attention to the activities of the lessee than it would otherwise and can have some level of control through the surface land lease agreement.

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**Comment Number** LE 315-8

**Commenter Name** Kevin Reuther

**Comment**

- Evaluation of likely disposition without exchange. The SEIS should evaluate likely future use scenarios for the offered land without the exchange in order to establish a reasonable baseline for evaluating any potential benefits of the proposal.
  - o The Forest Service should establish objective criteria on which it will base likely future use scenarios. A future use scenario that differs from an existing use should not be considered unless found likely based on the established criteria.

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**Comment Number** LE 315-9

**Commenter Name** Kevin Reuther

**Comment**

D. Alternatives

- ☐ Limit federal parcel to 2,840 acres. The land exchange notice indicates that the PolyMet project as proposed "would involve approximately 2,840 acres." Limiting the federal exchange to this amount should be an alternative evaluated in the SEIS.
- ☐ 6650-acre contiguous parcel •of offered land. The Forest Service should identify a parcel of land to evaluate as an alternative to the offered land that is a minimum 6650-acre contiguous parcel. Many environmental benefits depend on or are enhanced by the size and contiguousness of conserved land, including, for example, all types of habitat, the ability for wildlife to migrate or travel, and preserving roadless areas. The federal land proposed for exchange is 6,650 acres of contiguous land. A parcel of continuous land of at least equal size should be identified for evaluation as an alternative.
- ☐ Mineral excavation consistent with existing restrictions. As described above, the DEIS did not evaluate the alternative of accessing the mineral resource through means other than the proposed open pit mine. This basic alternative - even if it relies on a future technology - must be evaluated in the SEIS for the land exchange.

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## ALT          Alternatives for Consideration

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**Comment Number** LE 342-3

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment** In the issue of land trade, one must not only consider fragmentation and or location but the impacts on all lands in the trade both public and private. That is, without this trade No Mining takes place on any lands either public or private; so that any environmental impact statement must logically compare the impacts of mining versus the natural services generated from no mining.

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**Comment Number** LE 345-3

**Commenter Name** Michael Schelmeslie

**Comment** In respects to the land trade the mid and upper portion of the Cascade River in Cook County has some properties that I feel should be considered. Here is one that should be considered.

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## ALT Alternatives for Consideration

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**Comment Number** LE 356-6

**Commenter Name** Kristin Henry

**Comment** II. The Forest Service Must Ensure that it Considers a Reasonable Range of Alternatives Including an Underground Mining Alternative that Involves no Land Exchange.

NEPA requires an EIS to consider "alternatives to the proposed action." 42 U.S.C. § 4332(2)(C)(iii); see also 42 U.S.C. § 4332(2)(E). The requirement that agencies consider alternatives is critical to NEPA's implementation. Indeed, the alternatives analysis section is the "heart of the environmental impact statement." 40 C.F.R. § 1502.14. NEPA's regulations require an agency "to rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14. In its alternatives analysis, "[a]n agency must look at every reasonable alternative, with the range dictated by the nature and scope of the proposed action." *Northwest Environmental Defense Center v. Bonneville Power Admin.*, 117 F.3d 1520, 1538 (9th Cir.1997) (quotations omitted). "The existence of a viable but unexamined alternative renders an environmental impact statement inadequate." *Morongo*, 161 F.3d at 575 (internal quotations and citations omitted); see also *Resources Ltd v. Robertson*, 35 F.3d 1300, 1307 (9th Cir.1994) (quoting *Idaho Conservation League v. Mumma*, 956 F.2d 1508, 1519 (9th Cir.1999)).

The Forest Service should consider in its alternatives analysis an underground mining alternative in which the Forest Service does not exchange lands with PolyMet Mining Incorporated. Underground mining is a viable alternative to the surface mining project proposed by Polymet. The Minnesota Department of Natural Resources ("DNR") and the United States Army Corps of Engineers ("Corps") eliminated an underground mining alternative because it determined that this alternative did not meet the purpose and need of project because such an alternative "was not economically viable." DEIS at 3-64, Table 3.2.4. There are other agencies though that view underground mining as a viable option. The cooperating tribal agencies, citing a study by U.S. Steel of this mineral deposit, which recommended underground mining because the ore depths were so great that open pit mining would not reach them, believes this is a viable alternative.  
Id at 3-68.

In addition, DNR and the Corps' DEIS stated that it had eliminated alternative metal extraction technologies - underground mining is an alternative metal extraction technology - because it determined that "it would not have significant environmental benefits over the proposed action." DEIS at 3-68. The cooperating tribal agencies noted that underground mining has far fewer environmental impacts. Id. In its alternatives analysis, the Forest Service should extensively examine the different environmental impacts of each of these alternatives. Such an analysis is mandated by NEPA because its implementing regulations require an agency to present the environmental impacts of the proposed action and its alternatives in a comparative form. 40 C.F.R. § 1502.14. Without substantive, comparative environmental impact information regarding other possible courses of action, the ability of an EIS to inform agency deliberation and facilitate public involvement would be greatly degraded. See *Baltimore Gas & Elec. Co.*, 462 U.S. 87, 97 (1983).

The Forest Service should also consider as an alternative a land exchange of only 2,840 acres of land. In the scoping notice, the Forest Service stated: "In addition to national forest lands encompassed in the proposed NorthMet mine site, the Forest Service proposes to include an additional 3,810 acres of federal property in the land exchange as a means to avoid intermingled and inefficient ownership patterns and eliminate conflicts if minerals development were to expand in the future." Scoping Notice p. 1. The Forest Service should limit the proposed action to only the acreage needed for the proposed NorthMet mine. If the Forest Service does include an alternative that more than doubles the land exchange, it should alter its impacts analysis to include impacts for a mine twice as large as proposed. (This is discussed in detail below.)

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## ALT Alternatives for Consideration

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**Comment Number** LE 433-1

**Commenter Name** Anne Stewart Uehling

**Comment** Worse, what is now a single block of Forest will be fragmented in the exchange since the exchange involves more than four separate pieces.

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**Comment Number** LE 452-9

**Commenter Name** Randy Neprash

**Comment** The USFS could require PolyMet to be limited to underground mining, an option which was not addressed in the DEIS.

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**Comment Number** LE 457-9

**Commenter Name** Jane Koschak

**Comment** •The USFS Scoping Letter states, that: “Additional national forest acreage adjacent to the project site is proposed for inclusion in the land exchange as a means to...eliminate conflicts if minerals development were to expand in the future”. The potential loss of what could be called “buffer” lands (over and above the mining site) is also disturbing. This would facilitate future and further mining with future and further destruction of more public wetlands, public lands, and public watersheds. Why would the USFS include these lands in the land exchange, if not for this reason? To allow a land exchange that results in even more public land acreage being utilized for sulfide metal mining with stockpiling of overburden ultimately resulting in more acid mine drainage along with other potential environmental risks does NOT serve the Public Interest.

How does the USFS think that adding additional acreage adjacent to the project site for inclusion in the land exchange, which will result in more destruction of wetlands, public lands, and water sheds, will serve the Public Interest?

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**Comment Number** LE 505-2

**Commenter Name** Daniel Westholm

**Comment** If the acquired land is in no danger of being developed in its current ownership, there really is no benefit to the swap. As a suggestion for a piece of land to acquire that is in possible danger of development, consider the private holdings on the ridge north of Eggers Lake just west of the the Gunflint Trail. This is the second highest point in Minnesota (and has much higher vertical gain than Eagle Mountain) and should be protected.

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## ALT Alternatives for Consideration

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**Comment Number** LE 555-5

**Commenter Name** Sara Barsel

**Comment** The land exchange would facilitate the first sulfide mine in MN. The USFS currently has the ability and the requirement to control how PolyMet mines on the USFS lands. It is in the public's long term interest that they retain that right. The PolyMet plan calls for perpetual treatment. The persistent and long lasting pollution and degradation at the proposed mine site could be avoided if the USFS kept title to the lands and administered them as Weeks Act lands. The USFS could require PolyMet to be limited to underground mining- an option which was not addressed in the DEIS. It is the obligation of the USFS to protect the land, air, water, animal and other natural resources of the public lands being proposed for exchange. No acceptable mitigation has been offered for these losses.

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**Comment Number** LE 566-16

**Commenter Name** Marc Fink

**Comment** The Forest Service must rigorously explore and objectively evaluate all reasonable alternatives, including the no action alternative. 40 C.F.R. § 1502.14; Muckleshoot Indian Tribe v. U.S. Forest Service, 177 F.3d 800 (9th Cir. 1999). These alternatives must include considering other means to obtain the desired non-Federal lands; acquiring only non-Federal lands that do have a similar "conflict" between the surface and mineral estates; requiring PolyMet to comply with all current laws, regulations, and deed restrictions if it wishes to move forward with the NorthMet mine; and placing deed restrictions on the conveyed lands in order to adequately protect these surface lands from the proposed NorthMet mine.

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## ALT Alternatives for Consideration

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**Comment Number** LE 585-4

**Commenter Name** Bradley Sagen

**Comment** Alternatives to Proposed Exchange Must Be Considered

The purpose of the proposed land exchange is to grant PolyMet surface rights to develop three open pit mines on the lands now in federal ownership. It is the position of USFS that the mineral rights as currently leased by PolyMet do not include the right to open pit mine the National Forest System lands. PolyMet has rejected the idea of an underground mine that would have far fewer environmental impacts, while still providing metal resources to our national economy. They argue it is economically infeasible.

This position is refuted by others. Dr. David Chambers, a technical expert contracted by NMW to analyze the mine project, found that the company had done a limited analysis of the feasibility of this option.

"This was not a detailed analysis of the costs of underground mining at the NorthMet site. The document is only 2+ pages in length, and lays out what must be rough estimates of the costs of underground mining compared to open pit mining. The scope and depth of analysis presented in ALT11 is not enough to state conclusively that underground mining is not economical at this site" (Chambers, 2010 - attached to NMW DEIS comments).

Conclusion. USFS should examine the need for an exchange. A more thorough analysis is required of the underground mine alternative, examining ore distribution, the economic viability of this option and the potential environmental impacts of an underground mine.

Absent a definitive declaration on this point, USFS should include an underground mine as an alternative to the open pit mine proposed in the DEIS and should conduct the requisite analysis of the alternative as it relates to USFS obligations and stated goals.

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**Comment Number** LE 602-2

**Commenter Name** Frank Jeff Verito

**Comment** There is a plat map for the HayLakeexchange area which includes a lake and river access. All is good and well, except that the current NFS land would be too severely impacted by the mine. Concerning the other parcels, in order to study how these acquisitions relate to adjacent properties is imperative in order for the public to write effective comments.

The McFarland parcel would gain us access to a lake on the east boundary, however the Lakealready seems tarnished by Highway 16 and by private parcels just south of the McFarland. This acquisition may make sense anyway so long as the lakeshore is entirely public-owned to the north, then west of the McFarland parcel

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## ALT Alternatives for Consideration

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**Comment Number** LE 627-50

**Commenter Name** Betsy Daub

**Comment** Natural Resources in a Socially and Environmentally Acceptable Manner - Underground Mine Option  
The purpose of the land exchange is to grant the PolyMet Mining Company surface rights to develop three open pit mines on the lands now in federal ownership. It is the position of the Forest Service that the mineral rights leased by PolyMet do not include the right to open pit mine the National Forest System lands. PolyMet has rejected the idea of an underground mine that would have far fewer environmental impacts, while still providing metal resources to our national economy. They argue it is economically infeasible.

Not all who have assessed the project agree. Dr. David Chambers, one of the technical experts who worked with the Friends to analyze the mine project, found that the company had done a limited analysis of the feasibility of this option.

"This was not a detailed analysis of the costs of underground mining at the NorthMet site. The document is only 2+ pages in length, and lays out what must be rough estimates of the costs of underground mining compared to open pit mining. The scope and depth of analysis presented in ALT11 is not enough to state conclusively that underground mining is not economical at this site" (Chambers 2010).

The tribal cooperating agencies provide additional information to suggest more consideration should be given to the underground alternative:

"A study of this particular deposit was performed by U.S. Steel that recommended underground mining. By examining cross-sections showing the distribution of ore by depth, it appears that there are substantial ore reserves at depths that likely could not be accessed by the proposed open-pit mine. The ecological costs of open-pit mining and above-ground disposal of tailings and waste rock are immense. This ecological cost, combined with the most current understanding of deposit ore grades and reasonably possible metals prices, must be evaluated to determine the viability of this alternative" (Tribal Cooperating Agencies, DEIS pg 3-64).

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**Comment Number** LE 627-51

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
The Forest Service should examine the very need for an exchange at all. A more thorough analysis is needed of the underground mine alternative, examining ore distribution, the economic viability of this option and the potential environmental impacts of an underground mine. The Forest Service needs to outline how this exchange would help it meet its Forest Plan Goal of contributing to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner.

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## ALT      Alternatives for Consideration

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**Comment Number** LE 629-4

**Commenter Name** Christopher Krupp

**Comment**      The Forest Service must properly evaluate the No Action Alternative in the Draft Environmental Impact Statement.

According to your letter requesting these comments, the proposed NorthMet mine could not occur on these lands without the proposed land exchange, as the Weeks Act prohibits such mining on lands acquired under its authority. Analysis of the no action alternative must therefore be based on the proper assumption that no surface mining would take place on the selected Federal lands. See *Center for Biological Diversity v. U.S. Department of the Interior*, 2010 U.S. App. LEXIS 19767 (9th Cir. Sept. 23, 2010). The environmental impacts of the no action alternative must be compared with the likely impacts of the proposed alternative of an open pit sulfide mine on the Federal lands.

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## CCC Climate Change and Carbon Accounting

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**Comment Number** LE 282-58

**Commenter Name** Paula Maccabee

**Comment** ☐ Impacts of destruction of wetlands on carbon sequestration as related to global climate change;

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**Comment Number** LE 282-64

**Commenter Name** Paula Maccabee

**Comment** ☐ Consumption of fossil fuels required for mining and processing activities, including impacts on air quality and global climate change of power generation for these purposes;

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**Comment Number** LE 315-10

**Commenter Name** Kevin Reuther

**Comment**

- GHG emissions and carbon sequestration
  - o Analysis of emissions increases, direct and indirect
  - o Analysis of lost/gained future sequestration

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**Comment Number** LE 340-4

**Commenter Name** John Reed

**Comment** The SDEIS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities.

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## CCC Climate Change and Carbon Accounting

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**Comment Number** LE 356-15

**Commenter Name** Kristin Henry

**Comment** V. The Forest Service Should Do a Full Carbon Accounting to Determine How Much Sequestered Carbon This Proposed Action Would Emit.

The U.S. Department of Agriculture has emphasized the important role that public lands play in offsetting the emissions from burning fossil fuels that contribute to climate change: "Carbon dioxide uptake by forests in the contiguous United States offsets 11 percent of total carbon dioxide emissions. Forests and other ecosystems are carbon sinks, as they absorb CO<sub>2</sub>, thereby removing it from the atmosphere. Forest management activities will play a critical role in ensuring that forests remain a net carbon sink." National Roadmap for Responding to Climate Change, USDA Forest Service (July 2010) (attached as exhibit).

Under the proposed land exchange, the Superior National Forest will not remain a net carbon sink. The NorthMet Mine Project would directly or indirectly impact approximately 900 acres of peatlands. Peatlands are wetlands that formed over hundreds of years that consist of the decayed remains of plants, accumulating in stagnant, low-oxygen conditions that prevent the normal decomposition of vegetation. Peat bogs are incredibly effective at sequestering carbon that would otherwise contribute to climate change. The destruction of peatlands can release large quantities of previously sequestered carbon dioxide ("CO<sub>2</sub>") into the atmosphere. Scientists have calculated that the loss of 1,000 acres of Minnesota peatlands - approximately the amount that the NorthMet Project would destroy - translates to a release of approximately 2.7 million metric tons of CO<sub>2</sub> to the atmosphere. This is an increase in Minnesota's total annual emissions of CO<sub>2</sub> by approximately two percent (above 2005 levels) (Anderson et al., 2008).

In 2007, the Minnesota State Legislature requested that the University of Minnesota produce an assessment of the potential capacity for carbon sequestration in Minnesota's terrestrial ecosystems. The Minnesota Terrestrial Carbon Sequestration Project, an interdisciplinary research group, produced that assessment in February 2008, "The Potential for Terrestrial Carbon Sequestration in Minnesota." The report recommended that the state should "Preserve the existing large carbon stocks in peatlands and forests by identifying and protecting peatlands and forests vulnerable to conversion, fire, and other preventable threats" (Anderson et. al 2008).

The Forest Service must fully analyze the carbon sequestration impact from the proposed action. To do this the agency must do a complete carbon accounting so that it can compare the carbon sequestration impacts from the various alternatives.

While there is no golden standard in carbon accounting, at a minimum, the Forest Service should do a carbon accounting that projects the carbon accumulation and losses (sequestration and emissions) over the time covered by proposed project. There are several web-based carbon calculators available to assist with this accounting. For instance, the Forest Service could have used its own carbon estimator COLE ("Carbon On Line Estimator"), available at <http://www.ncasi2.org/COLE/>, or it could also use more complicated models and methods that it developed specifically to support carbon inventory management and reporting, available at <http://www.nrs.fs.fed.us/carbonltools/>.

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## CCC Climate Change and Carbon Accounting

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**Comment Number** LE 356-16

**Commenter Name** Kristin Henry

**Comment** VI. The Forest Service Must Analyze the Climate Change Impacts from the Entire Project, Including the NorthMet Mine Itself.

The DNR and Corps' DEIS does not address cumulative impacts of the NorthMet Project in light of climate change. The DE IS states "The potential impact of the NorthMet Project is evaluated only based on emissions of greenhouse gases from the project on its own and in combination with offsite emission generation. There are not analytical or modeling tools to reliably evaluate the incremental impact of a project's discrete greenhouse gas emissions on the global and regional climate. In addition, there are no analytical and modeling tools to reliably evaluate any cascading impacts. cumulative effects, from a particular project's greenhouse gas emissions on natural ecosystems and human economic systems in a given state or region." DEIS at 4.6-32 (emphasis added).

After claiming that there are no reliable modeling tools, DNR and the Corps completely shirk their obligations to examine impacts to effected resources (such as wetlands and wildlife) from climate change, including past, present and reasonably foreseeable future projects.

For instance, although the DEIS acknowledges that the state of Minnesota has set a goal of reducing greenhouse gas emissions to a level at least 80% below 2005 levels by 2050, DEIS at 4.6-30, it does not address whether the NorthMet Project's GHG emissions (258,648 CO<sub>2</sub>e tons/year) will significantly impact the states ability to achieve that goal. It does not determine whether the incremental impact of this project, when considered with other past, present, and reasonably foreseeable future projects, will impact this state declared goal or any other possible impacts. In fact, the DEIS completely fails to determine whether the project will have a significant impact on the environment in light of climate change. DEIS at 4.6- 28 - 4.6-33. Instead, the agencies simply make general statements regarding possible risks and then propose reclamation and mitigation activities to offset some of the impacts. DEIS at 4.6-32. The agencies never officially make a significance determination.

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**Comment Number** LE 499-3

**Commenter Name** Lois Norrgard

**Comment** Peatland is wetlands that have developed over many hundreds of years, and are one of the highest carbon sequestering ecosystems we have in Minnesota. Destruction of over 1000 acres of high quality wetlands - including these peatlands - would increase the CO<sub>2</sub> in our atmosphere at a time when we need to reduce CO<sub>2</sub> and mitigate climate change within a very short timeframe. This increase in CO<sub>2</sub> must be analyzed and the valuation for a land for land exchange must address the climate change impacts of this proposed exchange.

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## CCC Climate Change and Carbon Accounting

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**Comment Number** LE 627-42

**Commenter Name** Betsy Daub

**Comment** The proposed land exchange has real implications for carbon emissions in the state of Minnesota. These issues need to be more fully examined in the review process by the Forest Service.

Over 900 acres of the wetlands at the proposed mine site, a component of the federal lands in the exchange proposal, are coniferous bog and open bog peatland communities. If the project projections are correct, about 586 acres of peatlands will be directly impacted (destroyed) at the mine site by operations. Another 266 acres of peatlands are projected in the DEIS to be indirectly impacted, although the indirect impacts are likely to be higher than this figure. Combined, at least 852 acres of peatlands will be destroyed by the mine's operations.

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**Comment Number** LE 627-43

**Commenter Name** Betsy Daub

**Comment** Scientists have calculated that the loss of 1,000 acres of Minnesota peatlands translates to a release of approximately 2.7 million metric tons of CO<sub>2</sub> to the atmosphere. This is an increase in Minnesota's total annual emissions of CO<sub>2</sub> by approximately two percent (above 2005 levels) (Anderson et al., 2008). PolyMet's impacts on Minnesota's carbon emissions are likely to be close to this level, given their peatland impacts are nearly 900 acres and perhaps higher.

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**Comment Number** LE 627-44

**Commenter Name** Betsy Daub

**Comment** The destruction of the peatlands at the PolyMet mine site runs counter to the recommendations of both of these government-initiated studies.

The DEIS acknowledges the impacts in CO<sub>2</sub> emissions from wetland losses and other destruction of vegetation. "In addition, secondary emissions from the change in the existing land cover are projected. CO<sub>2</sub> emissions from carbon stock loss (i.e., wetland vegetation, trees and peat) due to the excavation of wetland and deforesting of the project area, as well as the loss in CO<sub>2</sub> sequestration from the affected land cover disturbances of the wetlands, forests, and peat storage would occur..." (DEIS pg. 4.6-31).

The DEIS notes that "...the Project would increase the CO<sub>2</sub> emissions in the atmosphere" (DEIS pg. 4-6-32), but it does not put this increase in a statewide context. The EIS fails to describe how much the project would add to Minnesota's overall greenhouse gas emissions.

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## CCC Climate Change and Carbon Accounting

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**Comment Number** LE 627-45

**Commenter Name** Betsy Daub

**Comment** The DEIS describes plans to mitigate wetland losses and greenhouse gas impacts associated with the wetlands destruction by "restoring high quality wetland communities of the same type, quality, function and value as those impacted by the Project" (DEIS pg. 4.6-33). And yet, the mitigation plan described fails to achieve that goal.

The DEIS notes that, "Given site limitations and technical feasibility, it is impractical to replace all impacted wetland types with an equivalent area of in-kind wetlands" (DEIS pg. 4.6-33). Despite the fact that most of the wetlands to be destroyed are open bogs and coniferous bogs (peatlands) the off-site mitigation acreage is "expected to exceed impacted acreage for all wetland types except for Type 8 (open bog and coniferous bog)" (DEIS pg. 4.6-33). So the type of wetland most impacted and most important for carbon sequestration, will be the least mitigated type of all.

The off-site wetlands selected for mitigating the NorthMet project's wetlands are at two distant sites near Aitken and Hinckley, Minnesota and contain very different characteristics than the wetlands to be destroyed by the project. The DEIS did not provide adequate documentation of all the sites evaluated for mitigation, making it impossible to determine why so many sites within the St. Louis River watershed were rejected.

The U.S. Army Corp of Engineers St. Paul District requires a wetland compensation ratio of 1.5:1. In other words, for every acre of wetland lost, 1.5 acres of wetlands must be replaced. The tribal cooperating agencies note that "the large acreage of wetlands to be directly impacted and the high quality of the wetlands warrant a mitigation ratio of greater than 1.5:1" (Tribal Cooperating Agencies, DEIS pg. 4.2-29).

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**Comment Number** LE 627-46

**Commenter Name** Betsy Daub

**Comment** The land exchange proposal is not likely to positively impact Minnesota's carbon emissions. The nonfederal candidate lands, if they have carbon sequestration capabilities (which have not at this point been described), already exist and function in that capacity. The exchange will result in operations that will emit carbon in significant amounts.

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**Comment Number** LE 627-47

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
Any carbon sequestration benefits from the nonfederal candidate lands should be explored and articulated. The public should be provided with a comparison of the carbon sequestration abilities of the federal and nonfederal lands. A carbon sequestration calculation should be conducted specifically for the federal lands. The public should be made aware that the exchange will result in a loss of carbon sequestering environments. The Forest Service should address how this exchange addresses the recommendations of both the Climate Change Advisory Group and the Terrestrial Carbon Sequestration Initiative. Within its analysis, the Forest Service needs to explore the significance of not mitigating the wetlands losses within the same geographic area, with the same wetland type, and how the wetland mitigation plan would affect greenhouse gas emissions. The Forest Service needs to examine how the exchange helps it meet the Forest Plan Goal of providing a variety of uses, values, products and services for present and future generations by managing within the capability of sustainable ecosystems, in light of climate change issues associated with this proposal.

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## CUI Cultural Impacts

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**Comment Number** LE 001-3

**Commenter Name** Larry Adams

**Comment** In addition to opposing the Land Exchange, I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 001-6

**Commenter Name** Larry Adams

**Comment** • The SDEIS must consider PolyMet's actual proposed use of the federal land - open pit sulfide mining and potential exploitation of the entire site - in determining what the public would lose in the exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 009-5

**Commenter Name** Wanda Ballentine

**Comment** Meanwhile, PolyMet's proposed open pit sulfide mining and potential exploitation of the entire site clearly means that the public will lose an enormous amount in an exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 070-2

**Commenter Name** Janice Greenfield

**Comment** I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 227-14

**Commenter Name** Matthew Tyler

**Comment** The 1854 Treaty also requires that the analysis must also be done in full consultation with Tribal Agencies.

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**Comment Number** LE 249-1

**Commenter Name** Darren Vogt

**Comment** The proposed project falls within the 1854 Ceded Territory, and if undertaken will affect resources, use of those resources, and ultimately treaty rights.

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## CUI Cultural Impacts

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**Comment Number** LE 249-2

**Commenter Name** Darren Vogt

**Comment** The purpose of the scoping is to identify issues to be included in the environmental impact statement. We believe that effects of the project on the exercise of treaty rights and maintenance of tribal cultural practices are issues to be addressed. Tribes are sovereign nations, and by treaty with the United States retain rights to hunt, fish, and gather in the 1854 Ceded Territory. Band members continue to exercise these rights. The harvesting and use of natural resources is part of Ojibwa identity and culture. Any threat to the access and harvest of traditional plants and animals is seen as a threat to Ojibwa culture and the right of band members to exercise their cultural identity.

The proposed project includes exchanging federal land of about 6,650 acres in size. This federal land consists of a single contiguous tract of mostly forested land. This area encompasses many acres of the 100 Mile Swamp, a large and high quality wetland. It provides habitat for wildlife along with a variety of plant resources that have been and could be utilized by band members exercising treaty rights. A clear understanding of the potential resources affected or lost by the proposed land exchange should be outlined. Effects to game species and associated habitat (moose is a priority) are of interest. Wild rice is a culturally important resource to the bands, and any potential impacts resulting from lands lost or acquired should be identified.

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**Comment Number** LE 249-3

**Commenter Name** Darren Vogt

**Comment** Impacts to cultural resources should be understood. The 1854 Treaty Authority supports avoiding impacts to known or discovered heritage resources in the project area. Consultation and communication with bands should occur to determine if specific concerns exist with lands involved in the exchange. Natural resources are also cultural resources to the Ojibwa, and effects to resources of cultural importance (moose, wild rice, plants, etc.) should be addressed.

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**Comment Number** LE 249-4

**Commenter Name** Darren Vogt

**Comment** Access (for hunting, fishing, wild rice harvesting, plant gathering, etc.) to the forest is an ongoing concern for us. Changes to or loss of access and use of public lands can significantly impact the exercise of treaty rights. The effects of the land exchange on access and availability of public lands should be identified.

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**Comment Number** LE 277-7

**Commenter Name** Nancy Schuldt

**Comment** The Fond du Lac Integrated Resource Management Plan (IRMP), approved by the Reservation Business Committee in 2008, identifies both on- and off-reservation resource management priorities, including protecting and improving wild rice harvest, improving in-stream habitat for fishing, preserving traditional hunting, fishing and gathering rights in the 1854 and 1837 Ceded Territories, preserving the quality and quantity of wildlife and wildlife habitat in the Ceded Territories, and vigorous environmental protection such as enforcement of water quality standards affecting the Reservation. The Band expects that the U.S. Forest Service, in facilitating the PolyMet Land Exchange, would coordinate with the policies expressed in our plans to protect natural resources on the Reservation and in the Ceded Territories.

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## CUI Cultural Impacts

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**Comment Number** LE 277-10

**Commenter Name** Nancy Schuldt

**Comment** Access to treaty-protected resources is of prime importance to Band members. Loss of access to or use of public lands within the Ceded Territory can significantly impact exercise of treaty rights, and this issue should be thoroughly evaluated in the SDEIS process. The Band also looks forward to substantive discussions with the U.S. Forest Service as part of the Section 106 (National Historic Preservation Act) consultation process, in order to raise more specific concerns about cultural and natural resource impacts that would likely occur under the proposed land exchange.

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**Comment Number** LE 282-5

**Commenter Name** Paula Maccabee

**Comment** WaterLegacy, finally, submits that the Feasibility Analysis does not reflect even a minimal procedural consultation with Indian Tribes.<sup>2</sup> The SDEIS must not only document consultation, but also comply with federal rules and Forest Plan requirements that prevent adverse impacts on lands to which Tribes have treaty rights. WaterLegacy's members would seek to hold our United States government to its legal and fiduciary obligations in undertaking a land exchange ostensibly on our behalf.

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**Comment Number** LE 282-23

**Commenter Name** Paula Maccabee

**Comment** The SDEIS must also recognize that lands adjacent to and downstream of the proposed PolyMet project are also Superior National Forest lands within the Ceded Territories so that impacts to watersheds and habitats affect management on adjacent Federal land and Indian trust lands.

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**Comment Number** LE 282-36

**Commenter Name** Paula Maccabee

**Comment** The FLPMA permits revision of land use plans in the National Forest System, but requires in that process that the Secretary of Agriculture "coordinate land use plans for lands in the National Forest System with the land use planning and management programs of and for Indian Tribes by, among other things, considering the policies of approved Tribal land resource management programs." 43 U.S.C. §1712(b). The Feasibility Analysis and conversations with staff confirm that the Forest Service has not reviewed Tribal land resource management plans that might be affected by the PolyMet Land Exchange.

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**Comment Number** LE 282-37

**Commenter Name** Paula Maccabee

**Comment** The Fond du Lac Integrated Resource Management Plan, in particular,<sup>16</sup> discusses the need to protect and improve wild rice harvest (p. 6), the importance of improving in-stream habitat for fishing (p. 29), the need to preserve traditional hunting, fishing and gathering rights in the 1854 and 1837 Ceded Territories (p.53), the need to ensure that the quality and quantity of wildlife and wildlife habitat is not depleted in the Ceded Territories (p. 54, p. 57) and the importance of environmental protection such as enforcement of water quality standards affecting the Reservation. (p. 63). Any proposed changes to the Forest Plan to facilitate the PolyMet Land Exchange must be coordinated with the policies expressed by Tribes, including the Fond du Lac Band, in their plans to protect natural resources on the Reservation and in the Ceded Territories.

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## CUI Cultural Impacts

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**Comment Number** LE 282-39

**Commenter Name** Paula Maccabee

**Comment** ☐ Evaluate the consistency of proposed changes in the Forest Plan that might be required to permit the PolyMet Land Exchange with all provisions and policies of Tribal Resource Management Plans, including the 2008 Fond du Lac Integrated Resource Management Plan.

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**Comment Number** LE 282-65

**Commenter Name** Paula Maccabee

**Comment** ☐ Impacts on Tribal usufructuary rights within the Ceded Territories, including access to hunting, fishing and gathering of wild rice and other plants identified by Tribes as significant;

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**Comment Number** LE 282-66

**Commenter Name** Paula Maccabee

**Comment** ☐ Impacts on Tribal resources within Reservations, including potential impacts of mercury contamination and impairment of aquatic ecosystems on Tribal fisheries.

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**Comment Number** LE 282-70

**Commenter Name** Paula Maccabee

**Comment** 4. The SDEIS Must Demonstrate Compliance of the Forest Service not only with Procedural “Consultation” with Indian Tribes Regarding Heritage Resources, but Consistency of the PolyMet Land Exchange and Proposed Use with Management Objectives for Indian Trust Lands and Federal Trust Obligations.

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## CUI Cultural Impacts

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**Comment Number** LE 282-71

**Commenter Name** Paula Maccabee

**Comment** SUMMARY

The Forest Service must first consult with Tribes regarding the nature of heritage resources that might be impacted by the PolyMet Land Exchange. The Feasibility Analysis demonstrates no such consultation. In addition to consultation regarding potential historical sites, the FLMPA and the Forest Service Handbook contain requirements that the intended use of the conveyed Federal land would not substantially conflict with established management objectives on adjacent Federal lands, including Indian trust lands. This requirement is substantive. Federal fiduciary responsibilities applicable to the Federal land and adjacent lands within the 1837 and 1854 Ceded Territories also require protection of Tribal rights and Tribal resources on and downstream of the Federal land. In assessment of the impacts of the PolyMet Land Exchange and intended use of the conveyed Federal land, the SDEIS must review the record that has already been made of Tribal concerns about impacts to Indian trust lands, rights and resources as contained in Appendix D of the PolyMet DEIS. If conflicts with the Forest Plan and concerns in these Tribal Comments cannot be resolved, federal laws, policies and trust obligations require rejection of the PolyMet Land Exchange.

### DISCUSSION

Federal law implementing the National Historic Preservation Act (NHPA) requires Tribal consultation to determine the nature and existence of heritage resources. As stated in federal rules:

The agency official shall ensure that consultation in the section 106 process provides the Indian tribe or Native Hawaiian organization a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking's effects on such properties, and participate in the resolution of adverse effects. . . Consultation should commence early in the planning process, in order to identify and discuss relevant preservation issues and resolve concerns about the confidentiality of information on historic properties. 36 CF.R. 800.2(c)(2)(ii)(A)

Federal rules recognize that historic properties of religious and cultural significance are frequently located on ceded lands of Indian Tribes. 36 C.F.R. 800.2(c)(2)(ii)(D). An agency is obligated to gather information from Indian Tribes to assist in identifying properties, including those located off Tribal lands, which may be of religious and cultural significance to them and may be eligible for the National Register. 36 C.F.R. 800.4(a)(4). Among other responsibilities, the agency is required to use "good faith effort to carry out appropriate identification efforts," which may include background research, consultation and oral history interviews as well as field sampling. 36 C.F.R. 800.4 (b)(1).

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## CUI Cultural Impacts

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**Comment Number** LE 282-72

**Commenter Name** Paula Maccabee

**Comment** It is puzzling that no such consultation is reflected in either of the Heritage Resources reports contained in the Feasibility Analysis.

The initial Archaeological Survey included in the Feasibility Analysis acknowledged that the archaeological potential of the large area that will be affected by the PolyMet open pit mining operations (approximately 3,300 acres) is “unknown, primarily because very little field survey has been conducted in such areas.”<sup>24</sup> This Phase I analysis identified one previously unrecorded archaeological site located in the north central part of the project area as a “a precontact Native American site characterized by lithic materials” and recommended that mining activities avoid this site, since “Pre-contact archaeological sites are rare in this landscape and this site is potentially eligible to the National Register of Historic Places.”<sup>25</sup>

However, after limited surveys and a Phase II investigation of one site that included three shovel tests and only 4.25 square meters of excavation,<sup>26</sup> the Feasibility Analysis concluded, “there are no heritage resource concerns with this proposal.”<sup>27</sup>

The Feasibility Analysis documents, including the methodology discussions for the Phase I and Phase II evaluations, include no reference to oral interviews or other Tribal histories and no indication that any effort was made to gather information from Indian Tribes to assist in identifying sites that might be of religious, cultural or historical significance. There is no indication that the limited field sampling conducted covers any, let alone all properties believed by the Tribes to have historical significance. This deficiency must be corrected in the SDEIS.

Courts have invalidated federal actions where Tribes were not consulted to identify historic properties of significance and mitigate any adverse impacts on such historic properties. *Muckleshoot Indian Tribe v. United States Forest Serv.*, 177 F.3d 800 (9th Cir. 1999). Violation of statutory procedural requirements in itself may violate the minimum fiduciary obligation to Tribes. *Pit River Tribe v. United States Forest Serv.*, 469 F.3d 768, 787-788 (9th Cir. 2006).

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## CUI Cultural Impacts

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**Comment Number** LE 282-74

**Commenter Name** Paula Maccabee

**Comment** Conflicts with Forest Plan requirements to protect watersheds, vegetation and wildlife will impact Tribal rights and resources. In addition, the Forest Plan contains provisions directly pertaining to Tribal usufructuary rights and Tribal cultural, social and economic interests. The PolyMet Land Exchange may not be determined to be in the public interest if it conflicts with the provisions of the Forest Plan specifically protecting Tribal rights and interests.

Tribal rights in the Ceded Territories are governed by 1837 and 1854 Treaties between the United States Government and the Chippewa (Ojibwe) Tribes as follows.

The privilege of hunting, fishing, and gathering the wild rice, upon the lands, the rivers and the lakes included in the territory ceded, is guaranteed to the Indians, during the pleasure of the President of the United States. 1837 Treaty, Art. 5.28

[T]he Indians shall not be required to remove from the homes hereby set apart for them. And such of them as reside in the territory hereby ceded, shall have the right to hunt and fish therein, until otherwise ordered by the President. 1854 Treaty, Art. 11.29

Forest Service staff members have stated that their obligation to consult with Tribes regarding the proposed PolyMet Land Exchange is more than a procedural requirement and that they value the relationship with Tribes. Moreover, both the Forest Service Manual and case law state that protecting Tribal rights and interests is obligatory.

The Forest Service Manual states that treaty rights are considered property rights protected by the 5th Amendment and, “The Forest Service must administer lands subject to off-reservation treaty rights in a manner that protects Tribes’ rights and interests in the resources reserved under treaty.” The Forest Service Manual further states, paraphrasing case law, “Treaty rights must be interpreted as the Tribes understood them at the time of treaty signing and ambiguous treaty provisions are to be interpreted in the Tribe’s favor. Treaty rights are held by the sovereign Tribes who signed the treaties.” F.S.M.§1563.01d.

The United States Supreme Court has upheld the rights of Chippewa (Ojibwe) Indian bands to hunt, fish, and gather rights on land in present-day Minnesota that they ceded to United States in the 1837 treaty. *Minnesota v. Mille Lacs Band of Chippewa*, 526 U.S. 172; 119 S. Ct. 1187 (1999). Many courts have found that there is federal trust responsibility to protect reservation water rights, fisheries and wildlife as well as a fiduciary duty to protect Tribal hunting, fishing and gathering rights.<sup>30</sup>

Compliance with federal trust obligations is a matter of concern both to Indian Tribes, who have their own representation as sovereign entities, and to citizens and taxpayers represented in applicable treaties by the government of the United States.

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## CUI Cultural Impacts

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**Comment Number** LE 282-75

**Commenter Name** Paula Maccabee

**Comment**

In connection with conflicts between the PolyMet Land Exchange and Tribal rights protected under the Forest Plan, the FLPMA and federal case law, WaterLegacy would emphasize that a record has already been made of Tribal assessments of the impacts of the PolyMet Project. Tribal Comments in Appendix D of the PolyMet DEIS detail Tribal concerns about impacts to watersheds, vegetation, wildlife and resources of particular salience to Tribes, including water quality, fish, wild rice and species hunted and gathered by Tribes. These Tribal Comments should be considered in the SDEIS in assessing whether the PolyMet Land Exchange is appropriate or feasible in keeping with federal law and fiduciary responsibilities.

Finally, as with other impacts of the PolyMet Land Exchange, the scale of potential impacts, cumulative impacts from other mining developments and the no action alternative must be analyzed with reference to Tribal rights and interests.

More specifically, the SDEIS must:

- Document thorough consultation with Tribes regarding potential heritage resources on the Federal lands, including but not limited to those on the proposed PolyMet mine site.
- Document consultation with Tribes and detailed assessment of conflicts between the proposed use of the Federal land for the PolyMet Project and management objectives for Tribal trust lands, including but not limited to provisions of the Forest Plan that specifically reference the well-being, rights and resources of Tribes, as follows:
  - o Desired condition: “Lands within the Forest serve to help sustain American Indians’ way of life, cultural integrity, social cohesion, and economic well-being.” (Forest Plan, D-TR-1, p. 2-37)
  - o Desired condition: “Superior National Forest facilitates the exercise of the right to hunt, fish and gather as retained by Ojibwe whose homelands were subject to treaty in 1854 and 1866 (10 Stat. 1109 and 14 Stat. 765). Ongoing opportunities for such use and constraints necessary for resource protection are determined in consultation with the following Ojibwe Bands: Fond du Lac, Grand Portage, and Bois Forte.” (Forest Plan, D-TR-3, p. 2-37)
  - o Standard: Forest management activities will be conducted in a manner to minimize impacts to the ability of Tribal members to hunt, fish, and gather plants and animals on Forest Service administered lands. (Forest Plan, S-TR-3, p. 2-38)
- Identify all specific provisions of Tribal resource management plans that may conflict with the PolyMet Land Exchange or any proposed amendments to the Forest Plan to permit such an Exchange.
- Identify all Tribal rights and resources that might be impacted by the PolyMet Land Exchange, including but not limited to the following:
  - o Hunting, gathering and fishing rights on the Federal land proposed for the PolyMet Land Exchange, addressing any Tribal perceptions of the differential value of usufructuary rights on the Federal and non-Federal lands;
  - o Hunting, gathering and fishing rights on Federal land within the Ceded Territories adjacent to or downstream of the land proposed for the PolyMet Land exchange, specifically discussing impacts on natural stands of wild rice and mercury methylation affecting fish and wildlife;
  - o Tribal Reservation resources that may be affected by the PolyMet Land Exchange and proposed use, specifically discussing impacts on water quality, air quality, aquatic ecosystems, mercury methylation and impacts on endangered animal species.
- Specifically analyze in connection with potential conflicts between the PolyMet Land Exchange and proposed and Forest Plan management objectives regarding watersheds, vegetation and wildlife as well as Tribal rights and interests all evidence and concerns reflected in Tribal Comments pertaining to the PolyMet Project in Appendix D of the PolyMet DEIS;
- Specifically analyze in connection with federal fiduciary obligations to Indian Tribes all evidence and concerns regarding adverse impacts of the PolyMet intended use of Federal lands reflected in Tribal



## CUI Cultural Impacts

Comments pertaining to the PolyMet Project in Appendix D of the PolyMet DEIS;

□ Analyze impacts to Tribal rights to hunt fish and gather in the Ceded Territories and Tribal Reservation resources at the following scales of impact:

- o Exchange of the Federal surface estate, considering Tribal assessments of the relative values of the Federal and non-Federal surface estates;
- o Impacts of the intended use of the Federal lands for the proposed PolyMet Project;
- o Impacts of the PolyMet Land Exchange, including the proposed PolyMet Project and additional future use of the balance of the 6,650 acres of Federal land;
- o Cumulative impacts of the PolyMet Land Exchange and future uses of the land and other current and future mining activities and developments;
- o A no action alternative preserving federal ownership and avoiding the PolyMet Project and other destruction of the Federal surface.

**Comment Number** LE 283-4

**Commenter Name** Margaret Watkins

**Comment** A stated purpose and need for the land exchange is to "consolidate land ownership so as to improve management effectiveness, improve public access to federal lands and reduce boundary lines". However, the federal land that could be acquired by PolyMet is a single parcel compared with the non-federal land split in five parcels. The draft Environmental Impact Statement claimed such a land swap "would" be an offset, even as it acknowledged the irreversible loss of culturally important natural resources. PolyMet would consume approximately 6,500 acres of federal land that includes thousands of acres of high quality wetlands, wild rice waters, and habitat for endangered species including the Canada lynx and the gray wolf. The USFS Handbook requires that the intended use of the conveyed Federal land would not substantially conflict with established management objectives on adjacent Federal lands, including Indian trust lands. Previous statements that the "Potential loss of access to public lands for tribal use due to the land exchange will be offset by the private lands proposed for exchange by PolyMet within the 1854 Ceded Territory" must be thoroughly investigated in the Supplemental Environmental Impact Statement (SEIS). To thoroughly investigate this claim, the SEIS must evaluate potential impacts to tribal rights and tribal resources that would result from the land exchange and include both a socioeconomic and cumulative effects analysis.

**Comment Number** LE 302-9

**Commenter Name** Kevin Proescholdt

**Comment** 6. Impact to Ojibwa Resources - Significant impacts to water resources, wetlands, wild rice and wildlife are possible from the project, and would affect natural resources available for Ojibwa use. Compensatory wetlands are proposed for outside the 1854 Ceded Territory and would result in a loss of these lands to the Ojibwa Bands. If the land exchange occurs, giving PolyMet ownership of the mine site lands, this area would be removed from public ownership and would diminish both Ojibwa Band members' and the general public's access to these lands. The potential impacts to wild rice beds from increased sulfate concentrations, and the potential impacts to fish consumption from methylmercury contamination pose significant cultural impacts to the Ojibwa Bands. The Forest Service must describe how the proposed exchange would help it meet its goal of contributing to efforts to sustain the American Indian way of life, cultural integrity, social cohesion, and economic well-being.

**Comment Number** LE 305-10

**Commenter Name** Maureen Johnson

**Comment** The United States has also made treaties commitments to the Native Americans about the use of this land and resources which must be treated with great respect at the level of treaty negotiations. This is a huge legal issue.

## CUI Cultural Impacts

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**Comment Number** LE 311-7

**Commenter Name** Ernest Lehmann

**Comment** • Not reduce the amount of lands available for hunting and gathering to the Tribes under the 1854 Treaty.

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**Comment Number** LE 323-8

**Commenter Name** Paula Maccabee

**Comment** Finally, the proposed Land Exchange raises challenging issues pertaining to tribal hunting and fishing rights under applicable treaties and historical tribal resources on the federal lands. The public will need time and an opportunity to hear from affected tribes before submitting scoping comments pertaining to these issues.

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**Comment Number** LE 462-6

**Commenter Name** Frank Ongaro

**Comment** Finally, the parcels proposed in the exchange are all located within the 1854 Ceded Territory. The exchange will improve the access for tribal hunting and gathering rights.

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**Comment Number** LE 585-12

**Commenter Name** Bradley Sagen

**Comment** 1854 Treaty Obligations  
The scoping document makes no mention of the fact that NMLE is part of the 1854 Ceded Territory. The federal lands proposed for exchange contain significant cultural resources to the Ojibwa Bands, including water resources, wetlands, wild rice, and wildlife. The value of the lands proposed for exchange must be evaluated as to their value to the Ojibwa Bands and lands of comparable cultural value must be part of the exchange. Extensive tribal comments have already been included in the DEIS. These comments plus any others submitted by tribes should be analyzed in the SDEIS with specific reference as to whether the proposed land exchange will serve tribal rights and interests.

The scoping document makes no mention of tribal groups having been consulted about the proposed land exchange. This is a significant error and should be corrected immediately.

Conclusion. The SDEIS must address specifically how the land exchange will not diminish the cultural resources protected by the federal government's 1854 Ceded Territory obligations.

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**Comment Number** LE 587-5

**Commenter Name** Alan Muller

**Comment** The proposal does not seem consistent with the interests and views of Indian tribes in the area of the proposed project, but this of course is for the tribes to say for themselves.

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## CUI Cultural Impacts

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**Comment Number** LE 592-1

**Commenter Name** Jessica Koski

**Comment** I interned with the US Forest Service over the summer of 2009. I am appalled that a decision could move forward that would swap the protected national forest public lands to a multinational mining corporation for private profit. This type of mining is risky and could have disastrous cumulative affects, including acid mine drainage, on the Lake Superior watershed and the drinking water of downstream communities including the city of Duluth. I have spoken with concerned Native American elders of this region who gather wild rice, cranberries, sacred medicines, and hunt and fish in the affected area. This area is "culturally us" as Anishinaabe people and the Treaty of 1854 should be meaningfully upheld by protecting the habitat of this area.

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**Comment Number** LE 615-1

**Commenter Name** LeRoy DeFoe

**Comment** I think we're all aware that the land swap property in question, is within the 1854 Ceded Territories. As the

Fond du Lac Reservation Tribal Historic Preservation Officer (THPO), I am authorized to comment on anything pertaining to the cultural resources associated with the Fond du Lac Band of Lake Superior. We, the Fond du Lac Band of Lake Superior Chippewa, think that any loss of land, where we currently practice our Treaty Rights upon, would be an infringement of our Treaty Rights. We value our Treaty Rights more than you can understand.

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**Comment Number** LE 627-58

**Commenter Name** Betsy Daub

**Comment** The proposed land exchange would lead to impacts to resources of significance to the Ojibwa. Significant impacts to water resources, wetlands, wild rice and wildlife are possible from the project, and would affect natural resources available for Ojibwa use. Compensatory wetlands are proposed for outside the 1854 Ceded Territory and would result in a loss of these lands to the Ojibwa Bands. If the land exchange occurs, giving PolyMet ownership of the mine site lands, this area would be removed from public ownership and would diminish both Ojibwa Band members' and the general public's access to these lands. The potential impacts to wild rice beds from increased sulfate concentrations, and the potential impacts to fish consumption from methylmercury contamination pose significant cultural impacts to the Ojibwa Bands.

It is not clear from the scoping materials if the candidate nonfederal lands bring cultural values to the Ojibwa Bands.

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**Comment Number** LE 627-59

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
The Forest Service must identify the impacts of the exchange to the Ojibwa Bands. A complete analysis of the cultural values of the federal and nonfederal lands must be conducted. The Forest Service needs to examine how this exchange helps it achieve a Forest Plan Goal of contributing to efforts to sustain the American Indian way of life, cultural integrity, social cohesion, and economic well-being

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## CUM Cumulative Impacts

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**Comment Number** LE 001-8

**Commenter Name** Larry Adams

**Comment** • The SDEIS must evaluate impacts as if all 6,650 acres may be torn up after the exchange and must also include cumulative impacts from other mining projects. Destruction of wetlands and wildlife corridors and water pollution may be more harmful due to nearby degradation caused by other mines.

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**Comment Number** LE 227-8

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis, of cumulative impacts of the land exchange to regional Threatened, Endangered, and Sensitive Species, including habitat connectivity, such a those done in technical documents related to the DEIS.

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**Comment Number** LE 227-10

**Commenter Name** Matthew Tyler

**Comment** •A comparative risk assessment of water quality degradation in the Lake Superior and Rainy River watershed with and without the land exchange. That is, a risk assessment of the likelihood and degree of water quality degradation related to the Private Lands would occur without the exchange vs. a risk assessment of the likelihood and degree of water quality degradation related to Federal Lands is likely to occur if the land exchange is made. This serves to assess the overall, regional effects on water quality as part of the cumulative effects assessment.

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**Comment Number** LE 305-2

**Commenter Name** Maureen Johnson

**Comment** SNF must also understand that any decisions made for NorthMet will set precedent for other mine proposals in the CuNi deposit. All other mine companies will expect equal treatment. Thus, USFS with the joint leads must consider the total effect of all the mines on the SNF and related water, land and air in Minnesota and Canada prior to deciding on NorthMet. An EIS on the total effect of mining the entire deposit should actually precede a suspended EIS on the NorthMet project. Both the Rainy Lake watershed with the Boundary Waters Canoe Area Wilderness (BWCA W) and the Lake Superior watershed will have serious environmental impacts from mining in the manner proposed by Polymet.

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**Comment Number** LE 305-3

**Commenter Name** Maureen Johnson

**Comment** Similarly, SNF must evaluate not only land exchanges for Polymet NorthMet - this is only the first of a number of mines in the CuNi deposit, a mining area that extends to and into the BWCA W to the northeast. The green circle on the Vicinity Map does not take this deposit area into consideration. Therefore this land exchange must be regarded as the first of at least several requests for more land exchanges that must be evaluated in whole as to their effect on the SNF and effects on water, land, and air resources that extend both to the BWCA W/Canada and to Lake Superior.

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**Comment Number** LE 312-2

**Commenter Name** Peter Leschak

**Comment** not to mention the US Forest Service's mission of responsible stewardship of the land. The rationale that, "Many of these federal lands [to be traded to PolyMet] are adjacent to lands extensively impacted by past and ongoing mining activities" is spurious. It says, in effect, some of the Superior National Forest has already been seriously degraded by mining, so let's just do more of it.

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## CUM Cumulative Impacts

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**Comment Number** LE 315-6

**Commenter Name** Kevin Reuther

**Comment** B. Federal land

- Impacts must include development of the entire 6,650 acres. The proposed land exchange includes 3,810 acres contiguous with but not currently part of the PolyMet impact area to "eliminate conflicts if minerals development were to expand in the future." Because the proposed federal parcel is more than twice the size it would need to be for the PolyMet project and because the purpose of including the additional area is to allow for future mining development activities, the Forest Service must evaluate the environmental impacts of such future mining development activities in the SEIS.

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**Comment Number** LE 323-7

**Commenter Name** Paula Maccabee

**Comment**

However, the Notice specifies that the proposed PolyMet Project would encompass 2,840 acres and that the exchanging the remaining 3,810 acres of National Forest land is proposed in order to "eliminate conflicts if minerals development were to expand in the future." (pp. 62757-62758). The PolyMet proposal, alone, represents the largest wetlands destruction ever considered by the USACE out of the St. Paul District. The significance of the Land Exchange extends beyond the scope of the PolyMet proposal, potentially exposing 6,500 acres to strip mine development.

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**Comment Number** LE 342-2

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment**

This trade in its overall effects increases the fragmentation and dispersal of federally owned lands. This in turn decreases management effectiveness and potentially decreases the integrity of the ecosystems concerned.

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**Comment Number** LE 342-6

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment**

This is an extension of Pt. #3 above concerning cost externalization. The services rendered from nature are becoming increasingly valuable every day due to decisions, both public and private, like this one that is pending, by which natural services are being eroded. That is, this decision is not being made in isolation but part of a process in which we are slowly losing benefits of our biosphere. As such, this mine is no different than what is happening to our tropical rain forests, coral reefs and habitat loss.

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## CUM Cumulative Impacts

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**Comment Number** LE 397-1

**Commenter Name** Bob Tammen

**Comment** Any proposal for a land exchange involving the Superior National Forest should incorporate a reasonable estimate of the total square miles of tailings ponds that will be required for full development of the Duluth Complex. Informed mining proponents have claimed there is a 5 billion ton ore body to be developed, much of it within the SNF.

It appears that most current mining operations in northern Minnesota require at least 3 square miles of tailings ponds. (Mesabi Iron Range Map-MN DNR Lands & Minerals) Proposed sulfide mining operations will probably need at least 3 square miles for each mine being the ore body is 99% waste. (Duluth Metals NI43-101)

In order to properly evaluate any proposal for a land exchange the reasonably predictable cumulative effects of tailings ponds should be considered.

An informed evaluation should also include estimates of total area consumed by pits & waste piles resulting from full development of the 5 billion ton ore body.

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**Comment Number** LE 397-2

**Commenter Name** Bob Tammen

**Comment** Several industry publications have predicted extensive development of the Duluth Complex. Any EIS that is not able to predict cumulative consequences of this development would be unsatisfactory and inadequate.

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**Comment Number** LE 457-14

**Commenter Name** Jane Koschak

**Comment** 6.How can the USFS ignore the cumulative effects of mineral exploration?

7.How can the USFS ignore the cumulative impacts regarding loss of and damage to wetlands?

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**Comment Number** LE 516-4

**Commenter Name** Meghan Luke

**Comment** It is the obligation of the USFS to protect the land, air, water, animal and other natural resources of the public lands being proposed for exchange. The main purpose of this proposed land exchange is to remove long standing environmental review and protections from public lands, which sets a dangerous precedent for exchanging public lands to private mining companies. The USFS currently has the ability and the requirement to control how PolyMet mines on USFS lands. It is in the public's long term interest that they retain that right.

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## CUM Cumulative Impacts

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**Comment Number** LE 555-4

**Commenter Name** Sara Barsel

**Comment** The main purpose of the land exchange is to remove long standing environmental review and protections from public lands. The land exchange would create a precedent by which the Superior National Forest could exchange public lands each time a mine gets close to the permitting phase. The land exchange relieves the Forest Service of their responsibilities to protect public lands in Minnesota.

PolyMet's land exchange would set a precedent for the exchange of public lands to mining companies where the Forest Service does not own the mineral rights to its lands. Particularly, it would pave the way for a Mining Region throughout Minnesota's Arrowhead Region. The land exchange facilitates a foreign company opening up a large strip mine and processing plant whose excess capacity could be used by other companies.

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**Comment Number** LE 566-1

**Commenter Name** Marc Fink

**Comment** The proposed land exchange would likely lead to the approval of the state's first ever sulfide mine, which previous environmental analysis has already determined would result in the destruction of thousands of acres of vitally important wetlands, the destruction of over a thousand acres of critical habitat for endangered wolves and lynx, produce acid mine drainage, further increase mercury levels in already impaired streams, impair aquatic species, and violate state water quality standards for hundreds to thousands of years.

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**Comment Number** LE 566-18

**Commenter Name** Marc Fink

**Comment** The Draft EIS must fully analyze and disclose the direct, indirect, and cumulative impacts of the proposed land exchange, along with the proposed NorthMet mine which is a connected, similar, and cumulative action. 40 C.F.R. §§ 1502.16, 1508.7, 1508.8, 1508.25, 1508.27.

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**Comment Number** LE 566-20

**Commenter Name** Marc Fink

**Comment** FLPMA forbids land exchanges unless the public interest would be well served by making the exchange. 43 U.S.C. § 1716(a). The value of the federal lands to be conveyed must not be more than the value of the non-federal lands to be acquired. 43 U.S.C. § 1716(b). The Center can see no possible way for the Forest Service to demonstrate that the proposed land exchange – which would likely lead to the implementation of the proposed NorthMet mine by a Canadian mining company, and thereby result in the largest ever destruction of wetlands in the region, an increase in already high mercury levels, the violation of water quality standards for hundreds to thousands of years, the irreversible degradation of Tribal lands, and destruction of over a thousand acres of formally designated critical habitat – is somehow in the public interest.

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## CUM Cumulative Impacts

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**Comment Number** LE 581-11

**Commenter Name** Steve Koschak

**Comment** 4.The USFS must evaluate impacts as if all 6,650 acres may be torn up after the exchange and must also include cumulative impacts from other mining projects. Destruction of wetlands and wildlife corridors and water pollution may be more harmful due to nearby degradation caused by other mines. What affect will this Land Exchange and the negative impact and destruction of wetlands, wildlife corridors and water pollution have on tourism and the related travel industry with the loss of jobs, income, and the very environment needed to make tourism work in northeastern Minnesota?

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**Comment Number** LE 585-3

**Commenter Name** Bradley Sagen

**Comment** Cumulative Impacts of Exchange Plus NorthMet Mine Project  
In carrying out the responsibilities for public surface lands just described, USFS must consider the acknowledged "connected" status of NMLE and the NorthMet Mine Project. The potential cumulative impacts of NMLE are therefore, those of the exchange plus those of the Mine Project, enabled by, and occurring as a result of the exchange. As noted earlier, USFS cannot escape its responsibilities for public lands simply by transferring a portion of those lands into private ownership. The consequences of future activities occurring in lands transferred to private ownership must be evaluated as part of the transfer. Duncan,109F.3d at 498.

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**Comment Number** LE 627-17

**Commenter Name** Betsy Daub

**Comment** The DEIS also fails to adequately evaluate the cumulative effects on air quality of the NorthMet project when combined with foreseeable projects. Not included in the analysis are the impacts from on-going and future hardrock mineral exploration in and near the Superior National Forest. Nonferrous mines in advanced stages of exploration and development (including projects by Duluth Metals and Franconia Minerals) were not evaluated for their impacts to air quality and visibility. The tribal cooperating agencies highlight the failure to include "any emissions from the Keetac Expansion Project which plans to increase production by 61% by reopening another furnace line" and "the Essar Steel Expansion project that is planned" (Tribal Cooperating Agencies, DEIS pg. 4.6-44).

The U.S. EPA also objected to the failure of the DEIS to examine cumulative impacts from foreseeable projects in an August 2009 letter, but the omission remained unaddressed.

"In order to accurately assess cumulative impacts of the proposed project, including those impacts to Class I and Class II areas, the DEIS air quality analyses...should consider all current and reasonably foreseeable projects occurring in the area. The air quality modeling analyses do not include a comprehensive inventory of existing and planned sources impacting regional air quality. In particular, the analysis does not appear to include the proposed Mesaba Energy power plant, the Mesabi Nugget Phase II projects, or the Keetac Expansion project...We recommend revising the air quality analysis to include all reasonably foreseeable projects in the area" (U.S. EPA August 2009).

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## CUM Cumulative Impacts

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**Comment Number** LE 627-18

**Commenter Name** Betsy Daub

**Comment** Recommendation:

The land exchange is an integral component in a mining project with identified significant air impacts to the Boundary Waters Canoe Area Wilderness and other public Class I airsheds. In assessing whether an exchange is in the best interests of the public and for the air resources over public lands, the Forest Service will need to examine potential impacts to air resources from the mine project. The additional analysis within the SDEIS need to be fully understood before any benefits or costs of this proposed exchange can be satisfactorily known. The Forest Service will need to assess proposed mitigation measures and determine if they adequately address the air pollution problems. Air impacts should include a full cumulative impacts assessment. The exchange and the subsequent mine need to be assessed for impacts in meeting the Regional Haze goals. The analysis should examine if the exchange meets the Forest Plan Goal of protecting and restoring air resources.

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**Comment Number** LE 647-1

**Commenter Name** Linda Kofstad

**Comment** This action would set a very serious precedent for further "land exchange of Superior National Forest and other environmentally sensitive Federal \*i.e. citizen-owned" lands.

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**Comment Number** LE 682-1

**Commenter Name** Robin Vora

**Comment** I may not know enough about the details of the project, but on the surface I am not so sure that restricting surface mining is a bad idea. I am concerned about the bigger picture environmental effects of all mining proposed in northeastern Minnesota. I believe a through cumulative effects analysis should be done before proceeding with this project. What are the overall impacts on watersheds, water quality and water quantity?

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**Comment Number** LE 704-6

**Commenter Name** John Roth

**Comment** Sixth, it is vitally important that no exchange of land be used to establish a precedent for other exchanges. For the proposed PolyMet exchange, this is particularly important, since there are so many other mining proposals throughout Superior National Forest. PolyMet's proposal, and any other future exchange proposal, must stand on its own merits and be approved or rejected without reliance on any other exchange or precedent.

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**Comment Number** LE 704-9

**Commenter Name** John Roth

**Comment** There also needs to be a specific, binding agreement from PolyMet and the Forest Service that says that this exchange, if agreed to, cannot be cited to justify any future proposed exchange.

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## ECO      Ecological Function and Value

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**Comment Number** LE 052-2

**Commenter Name** William Dustin

**Comment** Sulfide mining on the boundary of this area will destroy its wilderness character. Consequently the issue of property rights must be given the most serious consideration when evaluating this land transfer. The Superior National Forest and the Boundary Waters were established for the enjoyment of all U.S citizens and they are supported and maintained by the taxpayers. The proposed land transfer is not simply a transfer of land; it is a transfer that will radically change the character of the land and how it is used. It also involves giving away a non-renewable resource, the use of which has a permanent and adverse impact on the other resource values the area provides. Therefore, how are present and future citizens to be compensated for a private, foreign corporation's use of this non-renewable resource? How are they to be compensated for the lost opportunities that the mining of these minerals necessarily entails? And how are they to be compensated for the inevitable pollution and other negative externalities associated with sulfide mining? Because of all these adverse impacts, this is not a land transfer of equal value. The acreage may be equal, but that is all. A fair evaluation of the transfer must consider all the costs involved, and many of these costs cannot be evaluated in the simplistic monetary terms of cost-benefit analysis.

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**Comment Number** LE 063-12

**Commenter Name** Kristin Larsen

**Comment** The land was purchased by our nation and the value of that land must be recognized in the most profound manner, it is the exact kind of land you should be acquiring. This land is an aquatic resource of national importance "due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin." The land is valuable because of where it is and because of its naturally created profound protective functions for the watershed. Its value is not just the current value of similar land but of this land positioned as it is - protecting the headwaters. To say you can substitute other land is akin to saying that 4 kidneys distributed among 2 persons, with 4 being in one body and 0 being in another body means the same as 2 kidneys in each body - and you can't just put a kidney in a foot and hope things work out - the watershed is as it is naturally for a reason - to purify and protect the great waters. You can't exchange wetlands in the manner you are attempting to do without harm to the greater ecosystem. The functions performed by the land are protective of the water - permanently - and do not have a cost to the public. We don't have to pay to have the headwaters purified - the land does that. This is the most important function that land can perform - and to ignore that is wrong and impermissible. Multiple parcels of land are being considered in this exchange, these multiple pieces are of far less value to the ecosystem and thus to the nation and its people.

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**Comment Number** LE 227-20

**Commenter Name** Matthew Tyler

**Comment** For the land exchange to preserve the Federal estate and to protect water quality pursuant to the Forest Plan, the wetlands on the Private Lands must provide an equivalent degree of ecosystem services to those on the Federal lands.

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## ECO      Ecological Function and Value

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**Comment Number** LE 356-9

**Commenter Name** Kristin Henry

**Comment** IV. The Forest Service Must Adequately Evaluate the Ecological Benefits that the Public May Lose Under the Proposed Land Exchange.

The SEIS should closely examine the ecological benefits that the federal government will be giving up and what ecological benefits it may gain if it moves forward with the land exchange. The federal government is likely to determine through this cost-benefit analysis that the public and federal government would lose much more than it would gain.

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**Comment Number** LE 627-6

**Commenter Name** Betsy Daub

**Comment** Two of the non-federal candidate tracts for acquisition are located outside the Lake Superior Watershed. At least three of the candidates are outside the St. Louis River Watershed. The exchange would result in an actual loss of positively contributing wetlands to an important watershed. While candidate lands bring wetland values in different watersheds, they are already existing wetlands that are adding value at the present time. They just are not within public ownership. Through this exchange, Minnesota and the nation lose, but do not gain, wetland function values.

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**Comment Number** LE 627-19

**Commenter Name** Betsy Daub

**Comment** Variety of Life - Threatened, Endangered and Special Concern Species  
As described earlier, the federal lands within this proposal have been identified as high quality habitat value, representing rare habitat features within its landscape. These lands provide important habitat for a diverse array of wildlife, some of which are threatened, endangered or special concern species. The loss of this habitat needs to be fully evaluated in the assessment of this exchange. The biological value of the non-federal candidate tracts need to be understood much more completely.

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**Comment Number** LE 627-39

**Commenter Name** Betsy Daub

**Comment** Managing Biologically Diverse Ecosystems  
Under the proposed land exchange, the public would divest itself of a large, contiguous piece of high quality habitat and acquire five separate, significantly smaller and possibly fragmented, parcels. One of the tracts on nonfederal candidates is only 32 acres in size.

The quality of the wetlands and their values have already been explored in these comments. Ecologists are aware that contiguous and connected habitats offer much higher biological values than smaller, less connected parcels.

Little information has been provided the public about the nonfederal candidate lands in the proposal. It is difficult to tell from the photographs and maps if they are fragmented pieces within developed landscapes. If they are not, their habitat value is higher. But it needs to be noted that they are already providing those values even without being in public ownership.

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## ECO      Ecological Function and Value

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**Comment Number** LE 874-1

**Commenter Name** Diadra Decker

**Comment**      Financially, it would create a huge windfall for a foreign company at the expense of the American people, which legally prohibited. And sulfide mining activities likely would leave behind both, unacceptable long-term environmental impacts and financial liability. Neither, the ecological nor the market values of the federal and non-federal lands have been accurately assessed, and they must be characterized in detail. The potential adverse affects on groundwater quantity and quality of allowing open-pit mines in this location must be determined by empirical testing, not mere modeling.

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## FEA Feasibility Analysis Issues

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**Comment Number** LE 227-1

**Commenter Name** Matthew Tyler

**Comment** I have reviewed the PolyMet Land Exchange Proposal Feasibility Analysis and the Forest Service's NorthMet Land Exchange Scoping Information, and have concluded that the Feasibility Study is inadequate and that key objectives of the Forest Plan are not likely to be met with this exchange. I have identified many general areas where the analysis of the Land Exchange in the Supplemental DEIS must be greatly improved in order to meet the standards of scientific credibility and applicable Federal Law (e.g. Weeks Act, NEPA, and National Forest Management Act). I then discuss some of the specific problems I have identified in the Feasibility Analysis regarding wetlands and waters. Finally, I describe in depth the scientific and legal necessity of assessing the relative impacts of the wetlands on Federal and Private lands upon water quality, quantity, and flood control in the Lake Superior and Rainy River Basins.

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**Comment Number** LE 227-15

**Commenter Name** Matthew Tyler

**Comment**

- Estimates of wetland loss in the Feasibility analysis are lower than those in the DEIS. This is apparently because the Feasibility Analysis fails to consider indirect wetland losses due to PolyMet's open-pit mining proposal, even though there is considerable discussion of the issue in the DEIS, and figures used to discuss wetland mitigation in the DEIS include indirect losses. At the mine site, the project is predicted to result in wetland losses of 854.2 acres attributable direct effects and 318.6 acres attributable to indirect effects, for a total loss of 1,173 wetland acres (DEIS, 4.2-24). Tribal agencies, however, disagreed, arguing that the indirect losses were under predicted. According to tribal agencies, indirect losses would be much larger because the DEIS falsely assumes that wetlands in the project area are unconnected to groundwater, despite vegetative data that suggests otherwise, and because the DEIS relies on mine dewatering studies conducted at shallower mines in upland areas.
- ☐ While the Feasibility Analysis discloses some of the results of the MnRAM Wetland Functionality Assessment for wetlands within Federal Lands, it does not disclose the results of the MnRAM Wetland Functionality Assessment for the Private Lands, other than saying that the wetlands "rated high for most wetland functions and values and wetlands on the private parcels share similar characteristics to those on the Mine site and additional parcel." (Feasibility Analysis, pg. 6-2, emphasis mine) It is absurd that PolyMet should expect us to take their word on this matter. To be at all credible, the report should have included a full table comparing the numerical results of the MnRAM analysis for all wetlands on the Federal & Private lands.
- ☐ It is also apparent that different versions of MnRAM were used to assess different groups of wetlands. If meaningful comparisons are to be made, the same version of MnRAM should be used throughout.
- ☐ It is unclear from the Feasibility Analysis whether detailed, in the field, wetland delineation using Army Corps of Engineers methodology occurred in the Additional Federal Parcel and on all of the Private Lands. In some passages, it is unclear whether wetlands were delineated using aerial photos, National Wetlands Inventory (NWI) polygons, or on the ground wetland delineation. It is also unclear whether there was 100% delineation, or whether sampling methods were employed. Reliance on Aerial Photos and NWI polygons instead of on the ground delineation is scientifically inadequate. NWI polygons are intended for large scale (~1:24,000) applications, not specific project analysis. As the NWI metadata state:
 

"Thus, the data are intended for use in publications, at a scale of 1:24,000 or smaller. Due to the scale, the primary intended use is for regional and watershed data display and analysis, rather than specific project data analysis. The map products were neither designed or intended to represent legal or regulatory products. ... There is a margin error inherent in the use of imagery, thus detailed on-the-ground inspection of any particular site, may result in revision of the wetland boundaries or classification, established through image analysis." (U.S. Fish and Wildlife Service, 2010).

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## FEA Feasibility Analysis Issues

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**Comment Number** LE 227-17

**Commenter Name** Matthew Tyler

**Comment** These and other differences between the Feasibility Analysis and the DEIS suggest that the preparation of the Feasibility Analysis was sloppy and disingenuous. If the Supplemental EIS is to have legal or scientific credibility, it must not rely on the Feasibility Analysis, but instead be a rigorous, independent analysis that includes the full breadth of available information, including thorough searches of the scientific literature, and that fills data gaps by conducting relevant fieldwork using scientifically and statistically justifiable methodologies.

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**Comment Number** LE 280-4

**Commenter Name** Esteban Chiriboga

**Comment** GLIFWC staff are concerned that the shortcomings of the NorthMet DEIS have been carried forward in the feasibility analysis. For example, the FA includes information supplied by PolyMet Mining indicating that only economic benefits are associated with the proposed project. That analysis ignored abundant and well accepted information on the negative effects of a mining economy (e.g. Boom-bust cycles, reduction in tourism, etc). It is unclear if any information on the negative economic impacts of mine projects were incorporated into the FA. We hope that more balanced data and information for socioeconomics and other resource areas will be used in the development of the SDEIS.

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**Comment Number** LE 282-45

**Commenter Name** Paula Maccabee

**Comment** Feasibility Analysis of Environmental Effects  
It is understandable that a Feasibility Analysis of environmental effects, as a preliminary analysis, would be incomplete. With respect to the PolyMet Land Exchange, some statements in the Feasibility Analysis are misleading, while others raise issues which challenge the conclusion that the land exchange could serve the public interest.

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**Comment Number** LE 627-33

**Commenter Name** Betsy Daub

**Comment** The PolyMet scoping documents assess only two of the five nonfederal candidate tracts proposed in the exchange. The documents list certain species found on the two parcels.

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## FOR Forest Resources

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**Comment Number** LE 001-2

**Commenter Name** Larry Adams

**Comment** The exchange of this high-quality federal forest and wetlands to allow PolyMet's open pit mine would result in an enormous benefit to a private corporation and a huge loss to the public, harming natural resources important to Minnesota, the Great Lakes Region, and the entire nation.

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**Comment Number** LE 001-6

**Commenter Name** Larry Adams

**Comment** • The SDEIS must consider PolyMet's actual proposed use of the federal land - open pit sulfide mining and potential exploitation of the entire site - in determining what the public would lose in the exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 009-5

**Commenter Name** Wanda Ballentine

**Comment** Meanwhile, PolyMet's proposed open pit sulfide mining and potential exploitation of the entire site clearly means that the public will lose an enormous amount in an exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 148-1

**Commenter Name** Margot Monson

**Comment** From an economic standpoint, the exchange of high quality federal forest and wetlands for non-federal land that has few minerals, some of which has been heavily logged, is simply not an equitable trade for taxpayers nor the environment. The result will be a large and comparatively short term benefit to a private corporation compared to the greater loss and, in many cases, permanent harm to natural resources valuable to Minnesota, the Great Lakes region, the BWCA, and our nation.

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**Comment Number** LE 227-3

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis and comparison of long-term timber productivity and income generation on Federal and Private Lands. This should include site-specific field measurements of site index for each forested stand and calculations of soil expectation value for each stand, including possible uneven aged management options.

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**Comment Number** LE 227-4

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis and comparison of the degree to which the forest structure on the Federal and Private lands complements or conflicts with the current forest plan objectives, goals, and guidelines regarding landscape level forest age, species, and structural diversity.

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## FOR Forest Resources

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**Comment Number** LE 282-24

**Commenter Name** Paula Maccabee

**Comment** The Feasibility Analysis implies that the Management Area within which the Federal land is located, General Forest – Longer Rotation is somehow favorable for disposal to private ownership for “land adjustment.” (Feasibility Analysis, Summary Section 1, p. 2). This misconstrues the term “longer rotation,” which does not indicate less intrinsic value, but rather is a classification that differs from General Forest in that it provides less emphasis on logging and more emphasis on managing for older and larger trees. (Forest Plan, p. 3-10).

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**Comment Number** LE 282-33

**Commenter Name** Paula Maccabee

**Comment** VEGETATION  
 □ Objective: “Maintain acres of non-forested wetlands.” (Forest Plan, O-VG-4, p. 2-23)  
 □ Objective: “Increase acres of young lowland black spruce and tamarack forest communities. Increase acres of old-growth lowland black spruce and tamarack forest communities.” (Forest Plan, O-VG-16, p. 2-24)  
 □ Objective: “In mature or older upland forest types managed to maintain large patches (>300 acres of all types) manage patches to maintain the characteristics of mature or older native upland forest vegetation communities and promote the maintenance or development of interior forest habitat conditions.” (Forest Plan, O-VG-17, p. 2-24)  
 □ Objectives: “In Spatial Zones 1 and 2 maintain or increase amount of interior forest habitat. Provide interior habitat in a variety of upland and lowland vegetation communities.” (Forest Plan, O-VG-22, p. 2-26) “In Spatial Zone 3 strive to minimize the decrease in interior forest habitat in a variety of upland and lowland vegetation communities (Forest Plan, O-VG-25, p. 2-27)

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**Comment Number** LE 282-52

**Commenter Name** Paula Maccabee

**Comment** □ Delineation of the quality, ecology, nature and maturity of all forests on the Federal and non-Federal lands, identifying the degree and timing of past timber harvesting, including clear-cutting on these lands.

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**Comment Number** LE 282-57

**Commenter Name** Paula Maccabee

**Comment** □ Destruction and impairment of forests and forest habitat, identifying the maturity and degree to which the forest canopy is semi-closed or closed on any impacted uplands;

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**Comment Number** LE 324-1

**Commenter Name** Daniel Mundt

**Comment** I have been long involved and concerned about what is being done with respect to the whole matter of surface and ground water.

In my opinion, the knowledge that we have of ground water, its circulation, and migration is not a very reliable source of information.

The concern that I have is the affect on the development of the large project that is being proposed and what that will do ultimately to not just the forest and the wetlands habitat, the availability of the use of land for the public, but more importantly the entire water supply situation.

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**FOR Forest Resources**

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**Comment Number** LE 452-10

**Commenter Name** Randy Neprash

**Comment** 5. I am concerned that the land exchange will negatively affect sensitive species, including loss of habitat for moose and threatened lynx and wolves. I am also concerned about the loss of open spaces and loss of forests.

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**Comment Number** LE 457-13

**Commenter Name** Jane Koschak

**Comment** 5.How will the loss of forests be reconciled?

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**Comment Number** LE 516-3

**Commenter Name** Meghan Luke

**Comment** I am greatly concerned with the loss of wetlands and the loss of the "one hundred mile swamp;" with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx critical habitat. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves.

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**Comment Number** LE 682-4

**Commenter Name** Robin Vora

**Comment** I am not happy about the net loss of forest and natural habitats, and that should be addressed. The mining company should reforest some degraded land so the end result is no net loss of forest or natural habitats.

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## GSA General SDEIS Analysis

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**Comment Number** LE 001-3

**Commenter Name** Larry Adams

**Comment** In addition to opposing the Land Exchange, I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 001-7

**Commenter Name** Larry Adams

**Comment** • The SDEIS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities.

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**Comment Number** LE 009-6

**Commenter Name** Wanda Ballentine

**Comment** The Supplemental Draft Environmental Impact Statement ("SDEIS") study must consider all of the above as well as ALL possible environmental damage from such a mining operation: water quality violations, increased mercury in fish, air pollution near the Boundary Waters, impacts on global warming from mining activities, and impacts on the surrounding areas

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**Comment Number** LE 023-1

**Commenter Name** Thomas Brinkman

**Comment** The EIS must accurately account for ALL damages to our forests, wetlands, rivers, and lakes resulting from the swap, including those caused by acid mine drainage and heavy metal leaching.

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**Comment Number** LE 070-2

**Commenter Name** Janice Greenfield

**Comment** I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 148-4

**Commenter Name** Margot Monson

**Comment** It seems appropriate to ask for a complete analysis in the SDEIS, which if done objectively will make clear the problems outlined above.

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## GSA General SDEIS Analysis

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**Comment Number** LE 282-4

**Commenter Name** Paula Maccabee

**Comment** In order to comply with the Federal Land Management and Policy Act ("FLMPA") and the National Environmental Policy Act ("NEPA"), the SDEIS for the PolyMet Land Exchange must provide detailed evaluation of existing conditions and resources on the Federal and non-Federal estates and then evaluate all impacts of the proposed Land exchange, including the proposed use of the Federal land. The SDEIS must include environmental impacts of the proposed PolyMet open pit mine and related processing activities as well as the potential for future mineral exploitation on the balance of the Federal lands. The SDEIS must analyze both a no action alternative that would preclude the PolyMet open pit mine and analyze cumulative impacts of the proposed PolyMet Land Exchange and other current and future mining developments impacting watersheds, air sheds, habitats and endangered species. The analysis must describe impacts on management objectives for adjacent and downstream national forest lands and Indian trust lands. If the SDEIS were completed with appropriate depth and integrity, WaterLegacy believes it could not support a determination that the PolyMet Land Exchange is in the public interest.

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**Comment Number** LE 282-30

**Commenter Name** Paula Maccabee

**Comment** □ Identify any basis in law or fact for the Feasibility Analysis claim that the 6,650 acres of Federal lands are "chiefly valuable for non-National Forest Service purposes." In this connection, the SDEIS must explicitly analyze the value of the Federal lands as habitat and wildlife corridors for endangered species and the value of Federal wetlands as aquatic resources of national importance within the Lake Superior watershed.

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**Comment Number** LE 282-31

**Commenter Name** Paula Maccabee

**Comment** The Feasibility Analysis reviewed few substantive provisions of the Forest Plan, although it suggested that additional analysis should be included in the scoping process. (Feasibility Analysis, Summary Section 1, p. 16). The SDEIS must provide a comprehensive assessment of the impacts of the PolyMet Land Exchange, including future use of the Federal estate, and its potential conflict with desired conditions, standards, objectives and guidelines of the Forest Plan, including but not limited to the specific provisions listed herein:

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**Comment Number** LE 282-43

**Commenter Name** Paula Maccabee

**Comment** The SDEIS in these proceedings must contain a hard look at the environmental consequences of the PolyMet Land Exchange, including an analysis of PolyMet's proposed mining activities on the Federal land resulting from the land exchange. The SDEIS must address any misleading or incomplete assessments in the Feasibility Analysis, covering the full range of significant potential adverse impacts from the PolyMet Land Exchange and proposed future use.

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**Comment Number** LE 282-49

**Commenter Name** Paula Maccabee

**Comment** WaterLegacy requests that a candid and thorough analysis be conducted in the SDEIS to determine the environmental effects of the proposed PolyMet Land Exchange.

The SDEIS must analyze the existing nature and characteristics of resources on the Federal and non-Federal lands, including but not limited to the following:

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## GSA General SDEIS Analysis

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**Comment Number** LE 282-68

**Commenter Name** Paula Maccabee

**Comment** □ Evaluation of the no action alternative, including avoidance of the impacts of the PolyMet project and additional future mining use on the balance of the Federal lands and prevention of cumulative environmental impacts to watersheds, habitats, species, air sheds and global climate change.

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**Comment Number** LE 282-76

**Commenter Name** Paula Maccabee

**Comment** If the SDEIS were to include consultation required by federal law and analyze in detail the Forest Service's substantive obligations to protect Tribal resources and rights it would support a decision rejecting the PolyMet Land Exchange.

### CONCLUSION

WaterLegacy requests that a candid, complete and thorough SDEIS be prepared in connection with the proposed PolyMet Land Exchange, as described in detail in the preceding pages.

A rigorous SDEIS consistent with these comments would demonstrate that the proposed PolyMet Land Exchange does not meet the threshold requirements of federal law. The proposed Exchange would provide a private windfall to a foreign corporation and an enormous loss to the public rather than an exchange of equal value; would substantially conflict with federal law, policy and provisions of the Forest Plan protecting natural resources and Tribal rights, would cause irreparable harm to the natural environment, would be contrary to the public interest and would be inconsistent with federal trust obligations.

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**Comment Number** LE 302-12

**Commenter Name** Kevin Proescholdt

**Comment** In analyzing the exchange proposal, the Forest Service must collect, analyze, and present data that helps the public decide if the plan is in the best interests of the public and our natural resources. Many of the potential impacts of the exchange have to do with the inevitable development of a nonferrous mine should the exchange occur. The impacts of those activities must be included in the analysis of the exchange. In the SDEIS, the Forest Service will need to provide a great deal of information to help the public properly understand if this is a "good deal."

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**Comment Number** LE 307-3

**Commenter Name** Loni Kemp

**Comment** I request a specific analysis in the Supplemental Environmental Impact Statement (SEIS) to assess the relative harms and benefits to the public.

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**Comment Number** LE 340-4

**Commenter Name** John Reed

**Comment** The SDEIS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities.

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## GSA General SDEIS Analysis

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**Comment Number** LE 356-2

**Commenter Name** Kristin Henry

**Comment** The Forest Service must ensure that the SEIS examines the environmental impacts of the entire project. Specifically, the DEIS prepared by DNR and the Corps did evaluate the environmental impacts from the proposed NorthMet Mine on federal lands. It completely excluded federal land ownership from its analysis of impacts. The Forest Service should examine the environmental impacts from a federal land perspective in the SEIS.

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**Comment Number** LE 356-7

**Commenter Name** Kristin Henry

**Comment** III. The Forest Service Must Ensure that it Analyzes the Full Range of Possible Impacts.

As discussed above, the Forest Service proposes to exchange twice as many lands as the NorthMet Project currently needs to facilitate future mineral development. See Scoping Notice ("Forest Service proposes to include an additional 3,810 acres of federal property ... as a means to ... eliminate conflicts if mineral development were to expand in the future.") If the Forest Service proceeds with an alternative that includes a 6,650 acre federal land exchange it must ensure that its environmental impacts analysis is consistent with this land exchange.

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**Comment Number** LE 356-8

**Commenter Name** Kristin Henry

**Comment** In the DEIS prepared by DNR and the Corps, it only analyzed the impacts from the NorthMet project as planned, which would consist of only 2,840 acres of mining development. If the agency plans to give PolyMet an additional 3,810 acres for future mineral development, the agency must supplement the environmental impacts analysis done in the DEIS to account for this foreseeable future project. Specifically, the agency must analyze the environmental impacts, 'including impacts to wildlife, water quality (especially wetlands), climate change, financial assurances, and air quality, that would be associated with a mining operation that was twice as large as originally proposed.

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**Comment Number** LE 356-17

**Commenter Name** Kristin Henry

**Comment** DNR and the Corps' perfunctory analysis violated NEPA. See, e.g., *Natural Res. Defense Council v. Kempthorne*, 506 F. Supp. 2d 322,368-370 (E.D. Cal. 2007); *Pacific Coast Fed'n of Fishermens' Ass'ns v. Gutierrez*, 606 F. Supp. 2d 1122, 1183-1184 (E.D. Cal. 2008); *South Yuba River Citizens League v. National Marine Fisheries Serv.*, 2010 WL 2720959 at \*22-23 (E.D. Cal. 2010).

The Forest Service must remedy this violation by actually assessing climate change impacts from the entire project. This should include an analysis of the expected impacts to wildlife. For instance, under the proposed land exchange, the public would divest itself of a large, contiguous piece of high quality habitat and acquire five separate, significantly smaller and possibly fragmented, parcels. It is well known that large contiguous blocks of land are more valuable to wildlife under climate change. The Forest Service must thus analyze the impacts to wildlife for losing this block of habitat in light of climate change.

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## GSA General SDEIS Analysis

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**Comment Number** LE 397-2

**Commenter Name** Bob Tammen

**Comment** Several industry publications have predicted extensive development of the Duluth Complex. Any EIS that is not able to predict cumulative consequences of this development would be unsatisfactory and inadequate.

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**Comment Number** LE 452-12

**Commenter Name** Randy Neprash

**Comment** I formally request that an EIS be completed to address these issues.

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**Comment Number** LE 498-1

**Commenter Name** Daniel Shaw

**Comment** Before ANY exchange is made or mining done, we must make absolutely certain that there is no danger to the environment. Such evidence should be weighed by qualified and independent people with a stake in Minnesota's environmental future.

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**Comment Number** LE 566-2

**Commenter Name** Marc Fink

**Comment** The Forest Service has not yet provided sufficient information to the public in order to provide detailed comments on the land exchange proposal. As a result, the Center at this time primarily raises questions and issues that must be fully addressed and disclosed in a draft EIS if this proposal continues to move forward.

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**Comment Number** LE 566-17

**Commenter Name** Marc Fink

**Comment** The Forest Service must accurately describe the environment of the areas to be affected by the proposed alternatives. 40 C.F.R. § 1502.15.

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**Comment Number** LE 566-18

**Commenter Name** Marc Fink

**Comment** The Draft EIS must fully analyze and disclose the direct, indirect, and cumulative impacts of the proposed land exchange, along with the proposed NorthMet mine which is a connected, similar, and cumulative action. 40 C.F.R. §§ 1502.16, 1508.7, 1508.8, 1508.25, 1508.27.

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**Comment Number** LE 566-19

**Commenter Name** Marc Fink

**Comment** The Forest Service must insure the professional integrity, including the scientific integrity, of the discussions and analyses in the Draft EIS. 40 C.F.R. § 1502.24.

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## GSA General SDEIS Analysis

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**Comment Number** LE 566-25

**Commenter Name** Marc Fink

**Comment** The Forest Service must demonstrate that the proposed land exchange would comply with all applicable provisions and requirements of the Forest Plan for the Superior National Forest. 16 U.S.C. § 1604(i); see also 36 C.F.R. § 254.3(f). The Draft EIS must therefore list all Forest Plan standards, guidelines, and other provisions that apply, and demonstrate how this proposed land exchange would be consistent with each of those requirements.

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**Comment Number** LE 581-10

**Commenter Name** Steve Koschak

**Comment** 3.The USFS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities. What effect will these environmental harms have on fish and aquatic life, wildlife, the water aquifer, and ultimately human health?

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**Comment Number** LE 585-13

**Commenter Name** Bradley Sagen

**Comment** In the event USFS decides to proceed to the SDEIS without further review, the SDEIS must address the numerous shortcomings and requirements for further review identified in these comments.

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**Comment Number** LE 587-6

**Commenter Name** Alan Muller

**Comment** The point of all this is that the scope of the SDEIS must be comprehensive, fully considering all the impacts of the proposed Land Exchange. One way to think about this: What would be the differences, all the differences, some years from now, between the expected conditions with and without approval of the proposed Land Exchange? For example, the processing of ores from the proposed mining would consume large amounts of electric power. The environmental impacts of the generation and transmission of this power should be included in the SDEIS.

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**Comment Number** LE 598-2

**Commenter Name** Karen Updegraff

**Comment** With respect to the request of the scoping letter that we confine ourselves to "specific" comments, we would like to point out that this is a project whose ramifications extend far beyond the specific area(s) under consideration, and that we would be failing in our civic duty if we limited ourselves to short-sighted "back-yard" concerns. There are important existence values at stake and the scope of the SDEIS needs to take those into consideration. In particular, we would like to highlight the USFS's duty to protect public lands and waters.

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**Comment Number** LE 605-1

**Commenter Name** Todd Wilson

**Comment** Where is the demonstrated need for more copper?  
What recycling efforts could stem greater demand?  
What efforts are recommended to use less copper?

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## **GSA            General SDEIS Analysis**

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**Comment Number** LE 683-1

**Commenter Name** Ann Eastham

**Comment** I know in economic times like this, there is a general rush toward projects that will provide jobs. But why can't these compaies be encouraged via tax schemes to get involved in metals recycling instead?

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**Comment Number** LE 874-1

**Commenter Name** Diadra Decker

**Comment** Financially, it would create a huge windfall for a foreign company at the expense of the American people, which legally prohibited. And sulfide mining activities likely would leave behind both, unacceptable long-term environmental impacts and financial liability. Neither, the ecological nor the market values of the federal and non-federal lands have been accurately assessed, and they must be characterized in detail. The potential adverse affects on groundwater quantity and quality of allowing open-pit mines in this location must be determined by empirical testing, not mere modeling.

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## HAZ Contamination Issues and Phase I/II Assessments

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**Comment Number** LE 277-4

**Commenter Name** Nancy Schuldt

**Comment** The Federal Land Planning and Management Act (FLPMA) requires that National Forest System lands may only be exchanged for lands of equal value (43 U.S.C. §1716(a); 36 C.F.R. 254.12(a)). The policy is intended to avoid conferring an inequitable private benefit and the resulting public loss when exchanging federal for non-federal estates. However, the valuation of the federal estate appears to have been made without considering the future use of the property; i.e., the mining project described in the PolyMet DEIS and the de facto purpose for the land exchange. A full consideration of the fair market value and future use of the federal land in the proposed PolyMet Land Exchange would recognize a private windfall instead of an equal exchange, in violation of federal statutes, rules and policies. It is apparent from aerial photography that extensive clear cutting of timber has occurred on the non-federal land, and that there are three unauthorized dump sites on the Hay Lake non-federal tract, both of which may also reduce the public value of the non-federal lands.

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**Comment Number** LE 277-8

**Commenter Name** Nancy Schuldt

**Comment** The Band notes that there has been no consideration of water quality impacts in the FA, even though the Hay Lake parcel is located adjacent to the Minorca taconite pit that Arcelor Mittal Steel is currently using for disposal of tailings. Water quality in the Hay Lake parcel is likely already degraded by tailings basin seepage, as recent monitoring data from Mittal Steel reveals manganese, arsenic and fluoride concentrations above the intervention limit in their operating permit. The SDEIS should comprehensively evaluate these impacts, and ensure that the nonfederal parcels under consideration do not include hazardous substances.

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**Comment Number** LE 280-6

**Commenter Name** Esteban Chiriboga

**Comment** Water Quality was not analyzed in the FA. GLIFWC staff believe that water quality is an extremely important consideration for the land exchange. GLIFWC staff are concerned that the Hay Lake Parcel is immediately adjacent to the Acelor Mittal (formerly the Ispat Island) taconite tailings basin. Experience from the Cliffs Erie and Minntac tailings basins, which are of similar design, suggest that water quality in the Hay Lake parcel may be degraded by tailings basin water seeping from the Acelor Mittal facility. Water from taconite tilings basins have high concentrations of sulfate, manganese and other metals that are often in exceedance of applicable water quality standards. GLIFWC staff believe that acquiring land with existing water quality issues is not in the public interest. A full investigation of the current surface and groundwater quality at the Hay Lake parcel is vital for a complete assessment of the proposed land swap.

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**Comment Number** LE 282-11

**Commenter Name** Paula Maccabee

**Comment** Extensive clear cutting of timber on non-Federal land, which appears on aerial photographs, and the fact that there are three unauthorized dump sites on the Hay Lake non-Federal tract (Feasibility Analysis, Summary Section 1, p. 13) may also reduce the public value of the non-Federal lands.

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**Comment Number** LE 282-13

**Commenter Name** Paula Maccabee

**Comment** □ Assessment of dump sites in the Hay Lake non-Federal tract, including potential impacts on valuation of the non-Federal land and a Phase I and Phase II analysis.

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## HAZ                      Contamination Issues and Phase I/II Assessments

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**Comment Number** LE 282-53

**Commenter Name** Paula Maccabee

**Comment**                ☐ Analysis of the three unauthorized dump sites on the Hay Lake non-Federal tract, including both a Phase I and Phase II analysis to determine the nature and extent of materials dumped and potential soil and groundwater contamination.

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**Comment Number** LE 283-7

**Commenter Name** Margaret Watkins

**Comment**                The Hay Lake parcel is located near Mittal Steel's existing Minorca mine pits and tailings basins, and the mineral estate is severed. This parcel likely has polluted ground and surface waters based on studies by the MN DNR and monitoring data required for MPCA NPDES permits. Therefore, water quality issues must be analyzed in the SEIS.

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**Comment Number** LE 426-4

**Commenter Name** Bob Jackson

**Comment**                This particular open-pit mine, with its high probability of releasing toxic pollutants in this particular sensitive area is wrong.

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**Comment Number** LE 448-2

**Commenter Name** Dorie Reisenweber

**Comment**                Wherever there has been sulfide mining, the acid leachate has degraded the environment and polluted the water. The proposed swap of the public land with the mining company does not guarantee that those lands and the water within and below them will be protected. It is irresponsible to rely on unproven technology to prevent sulfide acid run-off. Nor should anyone count on some future technology to be devised to clean up water polluted by acid leachate and/or toxic heavy metals.

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**Comment Number** LE 699-2

**Commenter Name** Barry W. Tungseth

**Comment**                There is no proof that acid containment for the exposed possible contamination, works as a failsafe method. In fact, we know containment of those chemicals will ALWAYS have the possibility of leakage, thereby contaminating one of Americas greatest jewels of publicly owned land. I am not only talking about the Boundary Waters Canoe Area [BWCA], but also the Superior National Forest itself in and around the Babbitt, Ely, and Isabella area.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 150-1

**Commenter Name** Mary Moriarty

**Comment** When we commodify our citizen-owned forest land, we are paying too high a price for what is already legally ours.

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**Comment Number** LE 277-5

**Commenter Name** Nancy Schuldt

**Comment** The Band is also concerned that most of the non-federal land proposed in the PolyMet Land Exchange has a divided mineral estate. Divided ownership raises uncertainties about future benefits that the non-federal surface could afford to the public, further diminishing the value of the non-federal lands, and is not consistent with Forest Service Conveyance policy (36 CFR 254.15) which states:

(ii) The United States shall not accept lands in which there are reserved or outstanding interests that would interfere with the use and management of the land by the United States or would otherwise be inconsistent with the authority under which, or the purpose for which, the lands are to be acquired. Reserved interests of the non-Federal landowner are subject to the appropriate rules and regulations of the Secretary, except upon special finding by the Chief, Forest Service in the case of States, agencies, or political subdivisions thereof (36 CFR part 251, subpart A).

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**Comment Number** LE 280-5

**Commenter Name** Esteban Chiriboga

**Comment** It is our understanding that mineral rights for the some or all of the parcels would not be acquired as part of the exchange. The F A provides the results of a literature search that indicate a low potential for mineral development at the Hay Lake property. However, the FA indicates that the Hay Lake property mineral rights were not investigated in the study.

Directive Issuance 5470.3 of the Forest Service Manual clearly states "Because separate ownership of the surface and mineral estates can have an adverse effect upon land management objectives, place particular emphasis on keeping these two estates together." Based on this directive, we consider the lack of information on the mineral ownership at the Hay Lake parcel to be a serious data gap. The NEP A process should clearly justify adding the parcels to federal ownership with split surface and mineral estates when such a situation is the reason underlying the current proposed exchange.

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**Comment Number** LE 282-10

**Commenter Name** Paula Maccabee

**Comment** The value to the public of the non-Federal lands may be further diminished on closer analysis of the title and character of those lands. Although it is unusual for the Forest Service to consider an exchange where only limited title would be acquired, most of the non-Federal land proposed in the PolyMet Land Exchange has a divided mineral estate.<sup>9</sup> With divided ownership, at some future date, even the benefits that the non-Federal surface could afford to the public would be uncertain, diminishing the value of the non-Federal lands.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 282-18

**Commenter Name** Paula Maccabee

**Comment** Mineral Reservation and Protecting the Federal Surface  
Federal rules and the Superior National Forest Resource Management Plan (Forest Plan)<sup>11</sup> call into question the proposed acceptance of non-federal tracts with split estates and reserved mining rights. The Forest Plan states, "Fee simple estate will generally be acquired, but less than fee simple interest may be acceptable." (Forest Plan G-LA-1, p. 2-51). The underlying federal rule clearly limits the situations where a split estate may be accepted:

The United States shall not accept lands in which there are reserved or outstanding interests that would interfere with the use and management of the land by the United States or would otherwise be inconsistent with the authority under which, or the purpose for which, the lands are to be acquired. 36 C.F.R. 254.15(c)(ii).

The Forest Service hasn't demonstrated that the split estates on the non-Federal land would protect the non-Federal surface or any other justification for accepting less than the fee simple interest usually required under Forest Service rules and policies.

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**Comment Number** LE 282-21

**Commenter Name** Paula Maccabee

**Comment** □ Evaluate and address the inconsistency between acceptance of title to the non-Federal lands that include reserved mineral rights and divided estates and provisions of federal rules and policies favoring acceptance of fee simple estates in land exchange.

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**Comment Number** LE 282-29

**Commenter Name** Paula Maccabee

**Comment** □ Identify any basis in law, fact or practice for the characterization in the Feasibility Analysis that release of 6,650 acres of contiguous Forest Service land for the purpose of private mineral exploitation is a "land adjustment" under the Forest Plan. Include discussion of the consistency of relinquishing ownership of the Federal land with priorities for acquisition of land in the Forest Plan.

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**Comment Number** LE 283-2

**Commenter Name** Margaret Watkins

**Comment** Of the approximately 6,650 acres of land proposed for exchange to private ownership, the NorthMet mine site would encompass approximately 2,840 acres. The remaining federal property proposed for inclusion in the land exchange, approximately 3,810 acres, would improve intermingled and inefficient ownership patterns and eliminate conflicts if minerals development were to expand in the future. Many of these federal lands are adjacent to lands extensively impacted by past and ongoing mining activities."

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 283-3

**Commenter Name** Margaret Watkins

**Comment** The stated purpose and need for the land exchange is to "eliminate conflicts between the United States and the private mineral estate." However, it appears that mineral rights for the new parcels would not be acquired as part of the exchange. Current Forest Service lands proposed for exchange with Poly Met have severed mineral titles with deed restrictions barring strip mining. Non-federal lands proposed for exchange also appear to have severed mineral estates that may not contain any deed restrictions. Directive Issuance 5470.3 of the Forest Service Manual states "Because separate ownership of the surface and mineral estates can have an adverse effect upon land management objectives, place particular emphasis on keeping these two estates together." Consequently, additional information must be made available regarding ownership of the mineral estate, including any deed restrictions, to help ascertain whether the non-federal lands that may be acquired by the USFS may be subject to strip mining.

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**Comment Number** LE 283-11

**Commenter Name** Margaret Watkins

**Comment** The SEIS must discuss the implications of exchanging a federal land parcel with deed restrictions on the severed mineral estate for non-federal land parcels with severed mineral estates that may not contain any deed restrictions.

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**Comment Number** LE 305-4

**Commenter Name** Maureen Johnson

**Comment** The land exchange will not fulfill the purpose to "eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate." The land exchange consequences and the heavy metals mining effects on the remaining SNF land, water and air resources are inseparable and must be considered together. Land exchange decisions cannot be made separately from the integral environmental impact decisions discovered through the EIS process. The most disconcerting of these effects will occur well beyond the mining deposit area. With regard to SNF management, SNF will be making decisions that between nonrenewable resources and renewable ones.

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**Comment Number** LE 305-17

**Commenter Name** Maureen Johnson

**Comment** In the end, if a mining company cannot propose action that will comply with the state and federal water, air and land regulations, the SNF must decide that any subsurface mining rights must not be exercised now, but may be at some point in the future when the mining entity(ies) can truly guarantee compliance and clean water, air and land.

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**Comment Number** LE 311-2

**Commenter Name** Ernest Lehmann

**Comment** We are of the opinion that the mineral reservation which underlies PolyMet's lease clearly gives PolyMet the full right to mine the NorthMet deposit by open pit mining or other methods and that the Forest Service is exceeding its legal authority when it claims that it has any right or authority to impede such mining.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 311-3

**Commenter Name** Ernest Lehmann

**Comment** • Early conclusion of the exchange will eliminate the conflict between the USFS and Polymet.

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**Comment Number** LE 315-3

**Commenter Name** Kevin Reuther

**Comment** A. Mining allowed with the land exchange vs. mining allowed without it

The SEIS must clearly state and then analyze the difference between the environmental consequences of excavating mineral resources from the proposed federal land with and without the land exchange. As stated in the materials describing the land exchange, its purpose is to "eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate." MCEA agrees that applicable federal law places land management responsibilities on the Forest Service which would preclude approval of the open pit mining operation as proposed by PolyMet. However, those land management responsibilities do not preclude all mining. The "private mineral estate" referenced in the Notice is available for PolyMet or other private owners to exploit through means other than an open pit mine under existing applicable law and without any need for a land exchange. To evaluate the land exchange, therefore, the SEIS must include an analysis of environmental impacts of extraction of the mineral resources with existing applicable restrictions compared to the environmental impacts of extraction of the mineral resources without those restrictions.

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**Comment Number** LE 315-5

**Commenter Name** Kevin Reuther

**Comment** The required finding necessitates an analysis of the land exchange proposal that compares the exercise of private mineral rights (and realization of whatever benefits as well as impacts that may involve) under existing conditions (i.e., without the exchange) versus the exercise of private mineral rights if the exchange proceeds. To date, neither PolyMet nor any state or federal agency has evaluated the benefits and impacts of extracting minerals by means that are consistent with existing restrictions that preclude open-pit mining. This is the comparison the land exchange statute demands. It is an inescapable conclusion that continued growth in innovation and technological advances, even at paces much slower than seen recently, will lead to technologies that allow for the extraction of the mineral resources under the federal land without the need for an open pit mine. Whether such technologies exist today or whether mineral resources should be conserved for later generations are issues that have not yet been evaluated and are fundamental to the Secretary's determination of whether "the public interest will be well served by making the exchange." MCEA expects to see such analysis in the SEIS.

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**Comment Number** LE 323-6

**Commenter Name** Paula Maccabee

**Comment** In addition to the significance of the wetlands, forests, habitat and water bodies potentially affected by the proposed Land Exchange, there are particular concerns about the likely disposition of the land if ownership were to be transferred. The Notice of Intent is silent about the presence or absence of minerals located on the non-federal land and the likelihood that any wetlands or forests on that land would be torn up for mining if these lands remain in private hands.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 356-4

**Commenter Name** Kristin Henry

**Comment** As in Center for Biological Diversity, examining the environmental impacts of the proposed NorthMet project would substantially change if the agencies considered how land was owned, in particular applicable federal regulations under federal ownership. The DEIS would analyze the project's potential impacts in light of the applicable federal requirements, such as the Organic Act, National Forest Management Act, and others. Since these regulations establish different standards and guidelines, the applicability of these regulations would significantly change the environmental impacts analysis and scope of issues that the environmental analysis must consider. For instance, the Superior National Forest Plan has far different standards than were used under the DEIS, such as "watersheds ... are maintained or restored in a way that allows for the conservation of genetic integrity of native species," which would substantially alter the analysis. Superior National Forest Land and Resource Management Plan, July 2004.<sup>1</sup>

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**Comment Number** LE 356-19

**Commenter Name** Kristin Henry

**Comment** VIII. The Forest Service Should Fully Analyze the Split Estate Issue

The Forest Service claims that the proposed land exchange is needed because the federal lands currently have a split estate between the surface and subsurface rights. The agency should analyze whether the lands proposed for the exchange would also pose split estate issues. For instance, would the agency acquire the subsurface rights for all the non -federal lands proposed for exchange? If the agency would acquire split estate lands, it should consider in its cost-benefit analysis whether exchanging one set of split estate lands for another set of split estate lands really provides a benefit.

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**Comment Number** LE 381-1

**Commenter Name** Gary Clements

**Comment** I am writing with some heavy concerns regarding the proposed land exchange between the U.S. Forest Service and Polymet-Northmet in St. Louis County. I believe that there was a specific legal element in the creation of the Superior National Forest that prohibits mining for sulfide ores, because of the extreme environmental dangers. These dangers have been proven over and over again in other parts of the U.S.m to the huge detriment of the lands, forests, wildlife, and people who live near them.

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**Comment Number** LE 404-1

**Commenter Name** John & Carol Sayres

**Comment** This type of mining has not been proven safe; please do not allow it!

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**Comment Number** LE 406-1

**Commenter Name** Cindy Cantrell

**Comment** I do not see the value to the citizens of Minnesota and the U.S.A. of the proposed land exchange. "In addition, to National forest lands encompassed in the proposed NorthMet mine site", the Forest Service proposes exchanging additional lands to "avoid...inefficient ownership patterns and eliminate conflicts if minerals development were to expand in the future."

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 406-2

**Commenter Name** Cindy Cantrell

**Comment** True, the federal lands are adjacent to lands already impacted, but this exchange creates the potential for a larger amount of land to be impacted. Furthermore, under the Weeks Act, the Forest Service is restricted "from allowing surface mining as proposed by PolyMet". The proposed land exchange would allow more land to be mined, counter to the existing Weeks Act.

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**Comment Number** LE 452-6

**Commenter Name** Randy Neprash

**Comment** 3. The Scoping Letter states that: "Additional national forest acreage adjacent to the project site is proposed for inclusion in the land exchange as a means to . . . eliminate conflicts if minerals development were to expand in the future". Why is the Agency proposing to exchange lands with PolyMet for unknown and unplanned future mining?

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**Comment Number** LE 452-8

**Commenter Name** Randy Neprash

**Comment** Over half the mineral estate of the Superior National Forest, which includes the Boundary Waters, is privately held. Is the Forest Service going to land exchange all of their lands that have "conflicts" between the mineral and surface estates?

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**Comment Number** LE 452-11

**Commenter Name** Randy Neprash

**Comment** 6. Given the USEPA unacceptable rating of the PolyMet DEIS, I am astounded that the USFS is proceeding with consideration of a land exchange that will facilitate PolyMet's operation or sale. What will happen, if the land exchange is approved, but the amended PolyMet proposal(s) are not?

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**Comment Number** LE 456-8

**Commenter Name** Dennis Szymialis

**Comment** Furthermore, Minnesota has directly subsidized through state agencies and political subdivisions the operations of PolyMet through drilling subsidies, PUC rate increases to Minnesota power intended to benefit PolyMet, and through other grants and loans to PolyMet and other mining companies intended to use the processing facilities at PolyMet. The land exchange is just another subsidy to PolyMet which would not be a viable company on its own and puts the risk of investment on Minnesota citizens for the business failure and clean-up of PolyMet. These agreements along with a wetland exchange in the Floodwood MN area that was successfully challenged in court are themselves violations of the law and principle of connected actions. This wetlands exchange principle continues to be violated with the recent sale of the 320 acres of Lake County land to PolyMet to be used for wetlands mitigation on the eve of the submittal of these comments. The Forest Service and Corps of Engineers by making themselves partners in this case not only promote stealing from the taxpayers of the State of Minnesota, agency porkbarrel funding, but also encourages a violation and makes them a conspirator to a violation of the law for which they should be ashamed and prosecuted or fired from their positions.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 457-5

**Commenter Name** Jane Koschak

**Comment** The Land Exchange proposes to exchange 6,650 acres of federal land from public to private ownership for a Copper-Nickel Sulfide Strip Mine, removing the long standing Weeks Act of 1911 environmental protections which prohibit the destruction of USFS public lands. The Weeks Act allowed for the purchase of land by the federal government for the protection of watersheds. The land was to be held as National Forest lands forever, to be enjoyed recreationally by the public. Strip mining is not allowed on Weeks Act land, thus, PolyMet needs a land exchange to remove the current environmental protections in order to open up a strip mine. The proposed land exchange goes against the Weeks Act and does NOT serve the Public Interest.

How does the USFS think that the creation of a land exchange that goes directly against the 1911 Week's Act will serve the Public Interest?

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**Comment Number** LE 457-6

**Commenter Name** Jane Koschak

**Comment** The USFS owns the surface rights to these 6,650 acres of federal land, but not the mineral rights. Why would the USFS want to benefit a multinational mining company by removing the Week's Act's protections against strip mining? The underlying benefit of this proposed land exchange would go to PolyMet, and would not benefit the public interest.

How does the USFS think that benefiting a multinational mining company through removal of strip mining protections will serve the Public Interest?

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**Comment Number** LE 457-7

**Commenter Name** Jane Koschak

**Comment** Precedence will be set by the USFS. Over half of the mineral estate of the Superior National Forest, which does include the most visited park in the US---the Boundary Waters Canoes Area---is privately held. Is the US Forest Service going to land exchange all of their lands that have "conflicts" between the mineral and surface estates? This is most significant for all of our nation's people, not just Minnesotans. To allow a land exchange of this nature does NOT serve the Public Interest.

How does the USFS think that setting such precedence for ease of land exchange with foreign mining companies to eliminate the "conflict" between the mineral and surface estates will serve the Public Interest?

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**Comment Number** LE 499-2

**Commenter Name** Lois Norrgard

**Comment** The non-federal lands considered for this exchange derive no public benefit - in particular there is no plans to connect the surface and subsurface mineral rights of the land into the public ownership if the exchange were to go forward. This means the public will only face the same conflicts and problems with these new lands in the future if mineral resources are found.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 516-1

**Commenter Name** Meghan Luke

**Comment** I am opposed to a land exchange that is meant to remove long standing environmental protections on Superior National Forest public lands against strip mining. The land exchange would pave the way for PolyMet to strip mine national forest lands protected by the Weeks Act of 1911 and open a sulfide mining district across Minnesota's Arrowhead Region. A land swap if, approved, would have very negative environmental impacts on forests, wetlands and wildlife.

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**Comment Number** LE 516-4

**Commenter Name** Meghan Luke

**Comment** It is the obligation of the USFS to protect the land, air, water, animal and other natural resources of the public lands being proposed for exchange. The main purpose of this proposed land exchange is to remove long standing environmental review and protections from public lands, which sets a dangerous precedent for exchanging public lands to private mining companies. The USFS currently has the ability and the requirement to control how PolyMet mines on USFS lands. It is in the public's long term interest that they retain that right.

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**Comment Number** LE 555-2

**Commenter Name** Sara Barsel

**Comment** The Scoping Letter states that; "Additional national forest acreage adjacent to the project site is proposed for inclusion in the land exchange as a means to . . . eliminate conflicts if minerals development were to expand in the future". Why is the Agency proposing to exchange lands with PolyMet for unknown and unplanned future mining?

The U.S. Forest Service owns the surface rights to this land, but not the mineral rights. The underlying purpose of the land exchange would be to benefit a multinational mining company by removing the Weeks Act's protections against strip mining. Over half the mineral estate of the Superior National Forest, which includes the Boundary Waters, is privately held. Is the Forest Service going to land exchange all of their lands that have "conflicts" between the mineral and surface estates?

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**Comment Number** LE 566-4

**Commenter Name** Marc Fink

**Comment** Related to the Weeks Act, the Forest Service must fully disclose to the public how each of the tracts of lands to be conveyed were originally acquired by the United States, including all relevant statutes, regulations, proclamations, deeds and restrictions. Similarly, the Forest Service must fully disclose the surface and mineral ownership, along with all relevant restrictions and provisions, for all tracts of lands that would be acquired by the United States under the proposed land exchange. Such information is critical to the public's understanding of the economic impacts of the proposed exchange, the potential environmental consequences, and compliance with all applicable laws.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 566-13

**Commenter Name** Marc Fink

**Comment** According to the Forest Service, the proposed NorthMet mine could not occur on these lands without the proposed land exchange, because the mineral rights leased to PolyMet do not include the right to open pit mine national forest system lands. The no action alternative must therefore assume that no surface mining would occur, and compare the environmental impacts of the proposed alternative, in which an open pit mine is recognized as a connected action. See *Center for Biological Diversity v. U.S. Department of the Interior*, 2010 U.S. App. LEXIS 19767 (9th Cir. Sept. 23, 2010).

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**Comment Number** LE 566-14

**Commenter Name** Marc Fink

**Comment** The Forest Service must better explain the purpose and need for this proposal. 40 C.F.R. § 1502.13. The scoping notice states that the purpose and need for the proposed land exchange “is to eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate, in which PolyMet holds an interest.” First, it is the Center’s understanding that for the majority of lands acquired by the Forest Service pursuant to the Weeks Act, which now comprise the Superior National Forest, the Forest Service owns only the surface rights. It is also common knowledge that mining companies hold mineral rights and are conducting exploration across the Superior National Forest. For the Forest Service to simply exchange these national forest lands whenever there is a “conflict” between the Forest Service’s management and the private mineral estate, would violate the very intent and purpose of acquiring these lands under the Weeks Act.

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**Comment Number** LE 566-16

**Commenter Name** Marc Fink

**Comment** The Forest Service must rigorously explore and objectively evaluate all reasonable alternatives, including the no action alternative. 40 C.F.R. § 1502.14; *Muckleshoot Indian Tribe v. U.S. Forest Service*, 177 F.3d 800 (9th Cir. 1999). These alternatives must include considering other means to obtain the desired non-Federal lands; acquiring only non-Federal lands that do have a similar “conflict” between the surface and mineral estates; requiring PolyMet to comply with all current laws, regulations, and deed restrictions if it wishes to move forward with the NorthMet mine; and placing deed restrictions on the conveyed lands in order to adequately protect these surface lands from the proposed NorthMet mine.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 585-2

**Commenter Name** Bradley Sagen

**Comment** Responsibilities of USFS in the Proposed Exchange  
NMLE fails to acknowledge USFS responsibilities for protecting public surface lands under the National Forest Management Act (NFMA), the Organic Act, the Multiple Use Sustained Use Act (MUSYA), and the Forest Land Planning and Management Act (FLPMA). USFS is obligated to manage "a nationally significant network of lands, dedicated to the long-term benefit for present and future generations." (16 U.S.C. 1609a) This obligation extends to the exercise of private mineral rights where the Eighth Circuit has held that USFS has limited but substantial authority to "determine the reasonable use of the federal surface." *Duncan Energy Co. v. United States Forest Service*, 109F.3d 497 ("Duncan II") (8th Cir. 1997)

In particular, USFS has the authority and responsibility to restrict open pit mining on the national forest, including the conditions under which public lands might be transferred into private ownership.

FPLMA requires a land exchange in which the "public interest will be well served." Federal regulations require that "well served" include, "protection of fish and wildlife habitats, cultural resources, watersheds, and wilderness and aesthetic values." 36 C.F.R. 254.3 (b)(i).

Conclusion, USFS must acknowledge its responsibility for and authority over NMLE lands and must determine, 1) if the exchange is in the best interest of those and other federal lands potentially affected by the "connected" North Met Project; 2) the conditions under which the transfer should be made in order to protect the public interest. Issues raised by these considerations must be identified in the SDEIS. Special consideration should be given to prohibiting an open pit mine on the lands if transferred to private ownership.

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**Comment Number** LE 585-6

**Commenter Name** Bradley Sagen

**Comment** Justification for Additional Lands Included in the Exchange.  
NMLE includes more than double (6650 acres) the 2840 acres required for the NorthMet Project. The specific reasons for acquiring this much additional land must be described in detail. References to "eliminate conflict if mineral development were to expand in the future" do not suffice in this proposed extensive transfer of public lands.

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**Comment Number** LE 619-5

**Commenter Name** Steven Garske

**Comment** Finally, I am extremely concerned about the terrible precedent this land trade would set. A large, pristine block of public land would be exchanged for scattered lands of lesser value, so that a multinational mining company can destroy the public lands for private profit. Furthermore, mineral rights for some of the lands the Forest Service would get in return are apparently controlled by mining companies, so these lands could presumably be mined in the future.

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 627-2

**Commenter Name** Betsy Daub

**Comment** The proposal would exchange lands within the Superior National Forest ("federal lands") for other lands not currently in public ownership ("non-federal lands"), transferring the surface rights of the federal lands to PolyMet for the development of an open pit, non-ferrous sulfide mine. In the scoping introduction document from the Forest Service, it identifies 6,650 acres of federal lands proposed for exchange. In at least two scoping documents prepared by PolyMet, the amount of land is stated as 6,621 acres (PolyMet Land Exchange Proposal Feasibility Analysis: Threatened, Endangered, and Sensitive Species and Habitat Assessment for the Proposed PolyMet Land Exchange, pg. 1-1 and Wetland, Lake Shoreline, Stream Frontage, and Floodplain Assessment for the Proposed PolyMet Land Exchange, pg. 4-1.) We assume these to be misstatements, but please advise us if the figure is indeed not the 6,650 acres.

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**Comment Number** LE 627-48

**Commenter Name** Betsy Daub

**Comment** Provide a Variety of Uses, Values, Products and Services - Failure to Reunite Mineral and Surface Rights  
The proposed land exchange would acquire nonfederal lands that largely, if not wholly, contain private mineral rights below their surfaces. The scoping materials prepared by PolyMet show Tract 1, the largest of the nonfederal lands, having private mineral rights, with the other tracts still being evaluated. At least two of the tracts contain high to moderate mineral potential.

In our experience working with the Forest Service and with land exchanges, it has always been a stated goal of the Forest Service to look for opportunities to reunite surface and mineral ownerships. Co-ownership of surface and mineral rights minimizes land use conflicts on the public's land.

For this large land exchange, however, that does not seem to be a desired goal. Failure to reunite these rights may lead to land use issues on these acquired lands in the future.

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**Comment Number** LE 627-49

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
The Forest Service needs to evaluate the land exchange in light of the potential for a split estate. While a split estate already exists for the federal lands in the proposal, the exchange would potentially bring six or more different mineral owners with the candidate lands. This needs to be highlighted for the public. The Forest Service should articulate why reuniting the surface and mineral ownerships is not a goal for this exchange as it is for others. Potential land use conflicts in conjunction with the nonfederal candidate lands need to be examined. The Forest Service needs to examine how this exchange would help it achieve the Forest Plan Goal of providing a variety of uses, values, products and services.

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**Comment Number** LE 627-60

**Commenter Name** Betsy Daub

**Comment** In analyzing the exchange proposal, the Forest Service must collect, analyze and present data that helps the public decide if the plan is in the best interests of the public and our natural resources. Many of the potential impacts of the exchange have to do with the inevitable development of a nonferrous mine should the exchange occur. The impacts of those activities must be included in the analysis of the exchange. In the SDEIS, the Forest Service will need to provide a great deal of information to help the public properly understand if this is a "good deal."

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## LEG Mineral Rights and Legal Authorities

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**Comment Number** LE 682-3

**Commenter Name** Robin Vora

**Comment** It will be nice to pick up Hay Lake and the piece on McFarland Lake. Will the U.S. government also be obtaining the subsurface mineral rights at Hay Lake and the other parcels? If not, is there a likelihood of Hay Lake becoming the subject of another mining land exchange in the future?

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 009-3

**Commenter Name** Wanda Ballentine

**Comment** The National Forest land drains into the Partridge River, an important watershed for Lake Superior, and PolyMet's copper sulfide open pit mine would result in acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries, destroying at least 2,840 acres.

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**Comment Number** LE 063-8

**Commenter Name** Kristin Larsen

**Comment** Not only will water be impacted but the wild rice in the rivers, the fish and the humans drinking the water will be impacted if this land exchange is permitted to go forward. The mercury that will go into the water will be incorporated into the developing child in the womb for decades or centuries to come. Children's development downstream will be impacted by the decision you are making. If you remove the protection the land and its wetlands provides, the waters will be polluted and the impacts will be known long past the life of anyone who reads these words.

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**Comment Number** LE 081-1

**Commenter Name** Russell And Cynthia Hobbie

**Comment** As a physicist I wish to point out two facts that should be featured prominently in the Environmental Impact Statement.

1. Grinding up the ore into small particles would drastically increase the surface area exposed to air and water, and thus to the generation of toxic chemicals like sulfuric acid.
  2. Open pit mining would create transform vegetated areas that absorb water and release it gradually with artificial lakes that eventually fill and send rain water down-hill at much greater rates than occur now. This will result in erosion and pollution.
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**Comment Number** LE 148-2

**Commenter Name** Margot Monson

**Comment** Specifically, the impact on natural resources includes the loss of wetlands, the pollution of the lakes, rivers, and ground water of the region of the Lake Superior watershed and BWCA from acid mine drainage and leaching of toxic metals, as well as the threat to endangered species, and the degradation of tribal lands by its impact on wild rice stands, fisheries, and estuaries. An ecosystem that has evolved over eons cannot be truly restored to its original condition nor function,

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**Comment Number** LE 151-2

**Commenter Name** Linda Morris

**Comment** Once they have ruined our land and water, made their profits, they will leave. And what they will leave is a environmental mess that no amount of money can fix.

No amount of JOBS created will fix the problems they will leave behind. What is worth not being able to drink the water, loss of habitat and wildlife?

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 159-1

**Commenter Name** Nancy Giguere

**Comment** As someone who grew up in Arizona, I am well aware of the environmental damage caused by acid mine drainage, which has polluted more than 200 miles of rivers and streams in that state. When water becomes acidic it leaches out and disperses heavy metals into lakes and streams. Heavy metals are dangerous to health, wildlife, and the environment.

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**Comment Number** LE 170-2

**Commenter Name** Elanne Palcich

**Comment** In April of 2007, the PolyMet Wetlands Mitigation Plan was ruled to be illegal by Judge Heather Sweetland. In 2010, the EPA advised the ACOE to revise the wetland mitigation plans as laid out in the PolyMet DEIS. The DEIS itself was rated as environmentally unsatisfactory.

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**Comment Number** LE 170-6

**Commenter Name** Elanne Palcich

**Comment** Evidently, the USFS is unaware of the scope of this projected sulfide mining district, which is projected as a 5 billion ton mineral deposit. The ores within this deposit contain disseminated, low grade metals, meaning that 99% of the excavated material would be waste rock. This extracted waste rock and tailings would greatly disfigure the land, while acid mine drainage and toxic heavy metals would leach into the watersheds, requiring perpetual treatment. The vastness of this proposal would decimate wildlife, and would leave behind a wasteland unsuitable for future use. It would mean the demise of endangered or threatened species, including the lynx, and rapidly dwindling moose population, and loss of habitat for birds and migrating bird populations.

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**Comment Number** LE 170-7

**Commenter Name** Elanne Palcich

**Comment** Facilitating PolyMet is facilitating the opening of a sulfide mining district. Once Superior National Forest becomes parceled out, contaminated, and denuded, there will be nothing of value left to protect.

The PolyMet operation alone would involve the single largest loss of wetlands in the ACOE history in Minnesota. This includes the 100 Mile Swamp, designated as an ARNI. Loss of such a large area of wetlands means the loss of carbon sequestration ability, while the industry itself uses large amounts of carbon emitting electricity, fuels, and equipment.

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**Comment Number** LE 170-12

**Commenter Name** Elanne Palcich

**Comment** The superficial quality of this land exchange process is not an asset to a PolyMet DEIS that already lacks credibility. The USFS can take a stand now, or stand judged later. History is made in the present moment.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 202-3

**Commenter Name** Rachel Scott

**Comment** Further, Minnesota depends heavily on tourism, which would be adversely affected by mining operations which poison the habitat which supports our varied and interesting wildlife, from the loons, ducks and other species which inhabit the wetlands, to the fish in the pristine streams, where anglers spend countless hours fishing for trout. The beaver, otter, bears, moose, foxes and wolves will suffer adverse effects from poisoned land and waterways.

This is a deal with the devil Short term profits, short-lived jobs, in exchange for which we will be left with the legacy of irreparable harm to our natural forestlands.

Of course, where ever man encroaches we leave behind destruction in our wake, in the name of "progress." Why should this despoilation of our natural heritage be spared the fate that has befallen so many mining areas? Unless, finally, we have learned from our mistakes, and factor in the costs of quality of life for Minnesotans, for visitors, and for the flora and fauna of our National Forests, wetlands, and fresh water reserves.

Only one percent of the water on earth is available for human use. Lake Superior is the largest source of fresh water in the world. Is the water quality of Lake Superior of so little importance that we would trade away the tributaries which would be polluted by PolyMet mining, and subsequently empty into Lake Superior, degrading this valuable and unique resource?

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**Comment Number** LE 214-2

**Commenter Name** Zabelle Stodola

**Comment** I am aware that back in February this year, the EPA judged that PolyMet's NorthMet DEIS was Environmentally Unsatisfactory - Inadequate, the lowest possible rating. From research I have done, I have learned that fewer than 1% of Environmental Impact Statements receive such a negative rating. Apparently a revised, supplemental, Draft Environmental Impact Statement is underway requiring public review, but I cannot imagine why the USFS would want to be complicit in a land swap which, if approved, would involve very negative environmental impacts in forest and wetland areas and in areas, as mentioned in USDA literature, already badly impacted by previous PolyMet mining.

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**Comment Number** LE 260-2

**Commenter Name** Mike Schelmeske

**Comment** Doesn't trust what copper mining will do to watershed (ppm m water)

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**Comment Number** LE 280-3

**Commenter Name** Esteban Chiriboga

**Comment** The FA relies on information that was prepared as part of the NEPA process on the NorthMet Mine Project. The Draft Environmental Impact Statement (DEIS) released in October of 2009 included extensive tribal positions that detailed disagreements with the information presented by the DEIS contractor. In addition, the U.S. Environmental Protection Agency (EPA) gave the DEIS the lowest possible rating, expressing concerns about the quality of the document and the high potential for environmental impacts associated with the proposed project. This critical review has led to the need for a Supplemental DEIS for NorthMet.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 282-48

**Commenter Name** Paula Maccabee

**Comment** In addition to incompletely addressing wetlands, floodplain, uplands, species and habitat impacts of the PolyMet Land Exchange, the Feasibility Analysis contains no discussion of many potential adverse impacts of the PolyMet Land Exchange and resulting development of the PolyMet project, including acid mine drainage; seeps, discharge and leachate of copper, nickel, arsenic, manganese and other metals; mercury methylation; degradation of surface waters; violation of standards for groundwater and surface water; release of air toxics and particulates; increases in regional haze; and consumption of fossil fuel decreases in carbon sequestration affecting global climate change.

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**Comment Number** LE 282-67

**Commenter Name** Paula Maccabee

**Comment** ☐ Impacts on the nature of resources of the Federal estate as a consequence of the PolyMet Land Exchange of surface lands;  
☐ Impacts of the PolyMet Land Exchange, including implementation of proposed PolyMet open pit mining and minerals processing activities;  
☐ Impacts of the PolyMet Land Exchange, including the PolyMet Project and additional future use of the balance of the 6,650 Federal acres, including but not limited to potential minerals extraction activities related to iron in the Biwabik formation;  
☐ Cumulative impacts of the PolyMet Land Exchange, including the PolyMet Project, future mining use on the balance of the Federal lands and impacts of current and future mining activities and developments affecting adjacent lands and natural resources;

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**Comment Number** LE 302-2

**Commenter Name** Kevin Proescholdt

**Comment** 2. Damage to Important Watersheds - The development of the PolyMet mine has projected long-term water pollution issues associated with it, with implications for the health of the St. Louis and Lake Superior Watersheds. Proposed mine activities are predicted to result in water pollution for as much as 2,000 years.

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**Comment Number** LE 302-7

**Commenter Name** Kevin Proescholdt

**Comment** 5. Human Health Concerns - The mine project has identified discharges that would increase the presence of mercury within waters downstream of the mine, with increased risks of fish contamination, posing risks for human consumption.

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**Comment Number** LE 305-8

**Commenter Name** Maureen Johnson

**Comment** This is not an iron or taconite mine. This is not just another copper mine. This is a multiple heavy metals mine. Copper and arsenic are well known for their toxic effects, as demonstrated by the many pesticides that contain copper or arsenic or both as active ingredients.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 305-9

**Commenter Name** Maureen Johnson

**Comment** Nickel, cobalt, zinc, sulfate as toxic elements and in compounds are less well known, but the EPA and ATSDR have much knowledge and many regulations and reports about their toxicity. Unlike copper that is released more when acidity increases, these metals each have different release characteristics that must be understood to design treatment to meet water quality standards. For example, nickel releases not only in acid conditions but also toxic releases are documented when the pH is closer to neutral 7. Nickel and its toxic effects on biota will not be mitigated when the acidity for copper is treated. The other metals and compounds have their own nasty characteristics that make them hard to clean up. The high hardness that will result after copper acidity is treated will change the natural biota and conditions downstream. Will flotation chemicals be released? Polymet is ignoring these issues. Arsenic is released by increasing hardness - this may be an issue in the Nokomis area of the deposit.

For a basic understanding of effects of heavy metals, SNF must review, use and append to the DEIS the Agency for Toxic Substances and Disease Registry (ATSDR) Toxicological Profiles documents specific to each of the metals and substances that will be released. Because these documents have been carefully worded to present the truth about toxic substances, when discussing effects of released metals and chemicals on humans and biota through breathing, ingestion, or contact, quotes from these documents should be used in the SDEIS to avoid rewording that minimizes impacts.

Polymet proposes using taconite crushing techniques; the crushing results in air emissions of dust so fine as facial powder. Former employees have told me that the solution for employees at the taconite crusher was to open the doors. Copper will be in this air emission, and what will be the effect of copper particles carried by winds onto the lakes, wetlands and forest? Nickel will be in this air emission, and at this particulate size is cancerous to humans. What will be the effects of the other powdered metals and compounds that settle on the SNF resources? Polymet has not discussed these issues and treatment to avoid metals airborne deposition in its DEIS.

Then there is the issue of contribution to visual haze over the BWCA, which is also covered by federal regulations and has not been adequately discussed by Polymet.

Polymet has not disclosed all the chemicals it will use in processing. SNF should demand full disclosure and full discussion about air, water and land releases. SNF must assure that all elements and compounds in the wastes, leachates and air and water discharge (which may depend on the location of the deposit), that need further investigation are discussed in the SDEIS. Some of these contaminants are "toxic," some are "hazardous" by law. Polymet has not provided any description of handling hazardous and toxic wastes except to let much of it be diluted by discharge or dumped into a toxic soup at the "tailings basin".

Since Polymet, MDNR and USACE have reported incompletely by omission with their focus on copper and acidity, all of the mining discharges, treated effluent, air releases, land waste leachate, and effectiveness of proposed treatment in an effort to fully meet standards must be researched in their entirety by USFS to understand the effects of not only the land transfer, but also the effects of the mining on the SNF, Lake Superior, and BWCAW. Note that Polymet has used terms more often relating to meeting permit requirements rather than meeting standards; MPCA permits for the Dunka Mine have compromised some standards, and eliminated and ignored other standards.

One or two mentions are made in the DEIS about the state \$3 million CuNi study (1976- 1980) that takes up about 20 linear feet in the Minnesota Legislative Library, subsequent studies by MDNR Minerals and other studies. Much of this study uses data from CuNi waste rock piles at the closed Dunka mine. The studies conclude that the leachates cannot be sufficiently mitigated to meet state water quality standards.

Polymet cannot guarantee meeting standards for the hundreds of years that the waste rock/ mine pit

## MPD      Mine Project and DEIS Issues

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leachate and the treatment and retention basin seepage/overflow will require attention. Mining history shows that mining companies pull asset values, sell the remainder to smaller companies, and then they eventually go bankrupt, leaving the state and the US to pay for damages through Superfund. Example: The Reserve Mining

Company cleanup is now at \$14 million of state money for its dump on the shore of Lake Superior, and its other dumps have not yet been addressed. Minnesota has not seen the risks of CuNi mining yet, and its conditions are different from those of other mines in the country. Mining must contribute to a fund similar to the Hazardous Waste trust fund for Superfund cleanups sufficient to the risks, which are so far are very high that a mine will pollute sufficiently to require cleanup. USFS should investigate what is the percent of mines that wind up being cleaned up with state and/or federal money.

What are the noise effects on recreational users and local property owners from the mining district?

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**Comment Number** LE 305-11

**Commenter Name** Maureen Johnson

**Comment** Continual rainfall on the waste rock piles will cause leaching of toxic heavy metals and sulfate, which will affect the entire downstream watersheds into the BWCA and down to Lake Superior. The USFS should review possible treatments to meet standards that keep the water out of the waste rock (these have not been discussed by Polymet). Even landfill underliners and covers require indefinite collection of leachate for treatment and proper disposal for at least a half-century.

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**Comment Number** LE 305-12

**Commenter Name** Maureen Johnson

**Comment** It is my understanding that disruption of the wetlands (which normally act as a mercury sink), sulfate discharge that will support formation of methyl mercury (the most toxic form) and other activities of the mine (such as use of electricity from coal-burning plants) will increase the mercury burden in the watersheds and airshed of northern Minnesota. The sulfate will be disastrous to wild rice beds downstream. This should be quantified and evaluated in light of the mercury minimization required by federal legislation specifically directed at the Lake Superior watershed, and in light of any international agreements with Canada or other nations. It is my understanding that such increase in mercury would not be allowed under the federal act that is meant to protect Lake Superior and its watershed. This information may shed some light on minimizing the exchange in an effort to reduce wetland loss and release of mercury.

On the other hand, it is becoming obvious that at least the waste rock must be capped to keep rain water that otherwise would enter the piles from picking up dissolved metals and becoming leachate as it passes through. Soil capping will only shed a portion of the rain water. Capping such as closed landfills use with heat-sealed heavy gage plastic may require a larger footprint to be able to manage the cap and replace it when needed, since these caps usually are only guaranteed for 30 or 40 years, and they still can develop leaks for a number of reasons. This would require a recalculation of the number of acres to exchange.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 305-13

**Commenter Name** Maureen Johnson

**Comment** Another issue is contamination of water that is used for drinking. Colby Lake is a local water supply receiving water from the Partridge River. Where does the ground water go - are private wells at risk? Most campers do not bring their drinking water with them - they filter the surface water for drinking and cooking. What will protect these people from the heavy metals and other contaminants that will be released?  
Are any of the contaminants going to accumulate in fish that will be eaten by people?  
How will the contaminants affect the fishing in affected waters?  
Which waters will be affected sooner and which will be affected 50, 100, 300 years later, and in what manner?  
Even if the proposed treatment to meet standards for waste rock and the tailing basin is somewhat effective, what is the remaining effect over hundreds of years of leaching into the surface water, ground water?

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**Comment Number** LE 305-16

**Commenter Name** Maureen Johnson

**Comment** SNF in any case should detail its plan for attention to the various emissions of pollution from mining onto the SNF, and have a plan of action (a cooperative agreement?) to require treatment to meet standards and permit requirements through EPA.

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**Comment Number** LE 305-18

**Commenter Name** Maureen Johnson

**Comment** Regarding ownership or not, SNF liability for cleanup should be a consideration if the metal mine goes bankrupt. This is a legal issue. On the other hand, if the EIS is found to be lacking in important existing information, SNF may find itself along with Polymet, MDNR, and USACE, liable for not conducting a thorough EIS that would have caused a more effective treatment to fully meet standards to be used. This is also a legal issue. SNF should not follow through on any sale or land exchange until Polymet can show that its pollution in air, land, water and biota can be mitigated, collected and disposed properly, for the hundreds of years that the mining tailing ponds, pits, and waste rock will need care.

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**Comment Number** LE 307-4

**Commenter Name** Loni Kemp

**Comment** The federal land that would be lost includes thousands of acres of high quality wetlands and habitat for endangered species including the Canada lynx and the gray wolf. The federal land drains into the Partridge River, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. up to 6,650 acres of the federal land could be exploited for mining.

In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, has few minerals and much of it has been heavily logged. For the taxpayer as well as for the environment, the PolyMet Land Exchange would not be a fair trade.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 312-1

**Commenter Name** Peter Leschak

**Comment**      The Weeks Act of 1911, under which the Superior National Forest was established, was I intended for the preservation and enhancement of forest land, but also for the protection of watersheds. The sulfide mining activity proposed by PolyMet is clearly inimical to watershed protection. Serious and enduring contamination of water resources is guaranteed by this brand of mining. A specific and foolproof mitigation of this problem would be to prevent this operation in the first place. If the proposed land exchanges make it easier for the sulfide mining to proceed, then they would be a violation of the spirit of the Weeks Act-

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**Comment Number** LE 312-3

**Commenter Name** Peter Leschak

**Comment**      The telling lack of financial assurance by PolyMet to permit the future mitigation of the inevitable longterm environmental damage indicates that the US Forest Service should do nothing that advances the project.

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**Comment Number** LE 323-5

**Commenter Name** Paula Maccabee

**Comment**      The land drains into the Partridge River, which is a part of the Lake Superior Basin covered by Lake Superior Initiative water quality standards. Acid mine drainage, leaching of toxic metals and wetlands destruction from mining on former federal lands would impact downstream wild rice stands, fisheries and estuaries.

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**Comment Number** LE 324-1

**Commenter Name** Daniel Mundt

**Comment**      I have been long involved and concerned about what is being done with respect to the whole matter of surface and ground water.

In my opinion, the knowledge that we have of ground water, its circulation, and migration is not a very reliable source of information.

The concern that I have is the affect on the development of the large project that is being proposed and what that will do ultimately to not just the forest and the wetlands habitat, the availability of the use of land for the public, but more importantly the entire water supply situation.

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**Comment Number** LE 324-4

**Commenter Name** Daniel Mundt

**Comment**      I am very concerned and would like to see more documentation of what kind of information you have in terms of contamination, what is being done to mitigate the potential contamination, what is the affect going to be of having this large area with nothing in between it that can mitigate, and once you get contamination started in this area you contaminate not only the area, but everything else surrounding it. What is being done to promote continual daily monitoring.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 340-2

**Commenter Name** John Reed

**Comment** Assurances also need to be made that no pollution will drain into the Partridge River, which is a nationally important watershed for Lake Superior.

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**Comment Number** LE 341-2

**Commenter Name** Jon Rich

**Comment** These many lakes and streams cannot take the mining impact and still be kept as they are. We cannot take risk of unrepairable damage from copper mining. look at what happened in the gulf with the disaster of the oil well explosion. Water will be used in the mining process and this polluted water will find its way into the BWCA ecosystem. I am very sure if the mining occurs it will destroy the BWCA area. If the mining companies get in there it will be impossible to reclaim this area to its once pristine land. The wilderness act 1964 put the BWCA into a national wilderness preservation system. We are stewards of God's great land and we must protect it for future generations- we cannot undo the damage if the area is destroyed. We are looking at a few jobs for a few decades but at the risk of destroying this incredible area would be a disaster similar to the gulf oil problems now. Help us save this one of a kind wilderness!

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**Comment Number** LE 341-4

**Commenter Name** Jon Rich

**Comment** The real damage to this BWCA, Quetico, and Lake Superior is the unprecedented industrial expansion which will affect the qualities that draw people there. One of the worst threats will come from the mining of sulfide ores which is a particularly harmful type of mining. These sulfide ores contain heavy metals such as copper and nickel that bond together with sulfur to form sulfide minerals and a chemical reaction give sulfuric acid which can leach into surrounding lakes and streams at levels which are toxic to fish and aquatic life.

Acid mine drainage has already polluted over 12,000 miles of rivers and streams and over 180,000 acres of lakes and impounds in the United States. The EPA and DNR must stop this project as environmentally unsatisfactory and inadequate. It has too great an adverse environmental impact.

If this project is allowed it would threaten Minnesota's waters with toxic and heavy metal contamination and acid mine drainage.

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**Comment Number** LE 345-2

**Commenter Name** Michael Schelmeslie

**Comment** My concerns are for the wetlands and watersheds that this will effect, as a person who hunts, fishes, and gathers food in northern Minnesota. I am concerned with the effects of this type of mining. I want to know that what I gather will be safe to eat, that my daughter will be able to do this safely after I am gone.

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**Comment Number** LE 348-2

**Commenter Name** Lolita M Schnitzius

**Comment** It will benefit our area and its future. Those involved will achieve the appropriate methods to achieve results and be mindful of the environmental aspects.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 356-5

**Commenter Name** Kristin Henry

**Comment** In addition, the Forest Service in the SEIS should correct the deficiencies in DEIS that the U.S. Environmental Protection Agency ("EPA") identified. In their February 18, 2010 comments, the EPA ranked the NorthMet project as Environmentally Unsatisfactory, Inadequate. This is a rating given by the EPA less than one percent of the time on projects of this type. It is a failing grade based on a project that has adverse environmental impacts of a significant magnitude, unsatisfactory water quality impacts on a long-term basis, and wetlands mitigation plans that fail to address impacts. The EPA found that the analyses were inadequate to fully understand the scope of potential impacts from this project. The SEIS must address all of the deficiencies of the DEIS and provide an adequate assessment of the proposed action's impacts.

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**Comment Number** LE 363-2

**Commenter Name** Robert Stodola

**Comment** There are two basic reasons: the first reason is that it will significantly reduce wetlands acreage where the plant is to be located. The significance and importance of wetlands cannot be underestimated- as promoting biotic diversity and recharge acreage.

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**Comment Number** LE 372-2

**Commenter Name** Julie Viken

**Comment** I live in Duluth MN and am very concerned that this type of mining will definitely impact the waters around where they mine for many years to come. In WI they have laws that no mining companies can meet as they require 10 years of operations and 10 years post closing the mine and no leakage into nearby water ways. This law came into effect after a copper nickel mine was opened near Flambeau, WI. The mine was closed only four years after opening it and left behind lots of pollution in their water system.

The PolyMet mine is proposed to open a mine that would spill into the Cloquet River which is a tributary to Lake Superior, the world's largest freshwater lake.

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**Comment Number** LE 372-3

**Commenter Name** Julie Viken

**Comment** Tax payers are often left paying for the cleanup for mines like the sulfide mine proposed by PolyMet. Per research performed by Friends of the BWCA on the sulfide mining situation:

- Zortman-Landusky Mine, Montana – \$33 million and counting
- Summitville Mine, Colorado – \$185 million and \$1.5 million/year
- Grouse Creek Mine, Idaho – \$53 million

Price tags for cleanup of sulfide mines can run very expensive and MN needs to be getting PolyMet to put up enough money to cover such cleanup in case the company goes bankrupt. The state of MN has a huge deficit that we are facing in the near term, and we definitely cannot afford to take on this type of project without such escrow money from PolyMet to protect our environmental interest in northern MN.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 381-2

**Commenter Name** Gary Clements

**Comment**            The area in question is in a wetland environment, in which it would be even more tricky to contain the resulting acid mine drainage. This land exchange would clearly be in the interest of these foreign corporations, but in the long run, NOT in the interest of the forest, its permanent inhabitants, and the people of Minnesota.

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**Comment Number** LE 381-3

**Commenter Name** Gary Clements

**Comment**            The original DEIS clearly stated that the seepage would occur, and to this point the mining companies have lobbied hard in the Minnesota Legislature against even a financial assurances bill that would require them to put up money ahead of time to pay for any possible cleanup. Are we taxpayers to assume that financial responsibility? It says volumes that they claim that they won't pollute, but they fight so hard to absolve themselves of financial responsibility for it. I ask that the SDEIS fully address the issue of financial assurances in the form of hard cash, bonded so that later a bankrupt company can't disappear leaving us holding the mess.

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**Comment Number** LE 395-3

**Commenter Name** Molly Woehrlin

**Comment**            The long term environmental protection is more important than the short term mining of metals/minerals and any jobs created.

The damage to the natural area would far outweigh the liability for the public and the generations that follow us.

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**Comment Number** LE 397-1

**Commenter Name** Bob Tammen

**Comment**            Any proposal for a land exchange involving the Superior National Forest should incorporate a reasonable estimate of the total square miles of tailings ponds that will be required for full development of the Duluth Complex. Informed mining proponents have claimed there is a 5 billion ton ore body to be developed, much of it within the SNF.

It appears that most current mining operations in northern Minnesota require at least 3 square miles of tailings ponds. (Mesabi Iron Range Map-MN DNR Lands & Minerals) Proposed sulfide mining operations will probably need at least 3 square miles for each mine being the ore body is 99% waste. (Duluth Metals NI43-101)

In order to properly evaluate any proposal for a land exchange the reasonably predictable cumulative effects of tailings ponds should be considered.

An informed evaluation should also include estimates of total area consumed by pits & waste piles resulting from full development of the 5 billion ton ore body.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 401-1

**Commenter Name** Barbara Kaufman

**Comment** In addition, the amount of toxins that will be released into the environment is unknown. Please let caution and care for our environment be the guide in making an irrevocable decision.

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**Comment Number** LE 425-2

**Commenter Name** Warren A. Olson

**Comment** In spite of technological advances in extracting the metal from these ores, the technology is not good enough. Once the ores are gone, the mining companies are gone, the employment is gone, and the state is left with an environment that is destroyed. There are many future potential hazards that remain unknown.

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**Comment Number** LE 446-1

**Commenter Name** Bruce Reno

**Comment** I would like to know who is going to pay for the water and land contamination that will happen with this type of mining. What would be the economic impact to the state when all costs are accounted for from contamination to surrounding areas, loss of tourism dollars from contaminated water, lakes and streams from the disposal of waste materials. Stripped land that will not be able to regenerate itself due to the loss of the limited nutrients that already keep the area forested as has been shown from other strip mining across the country. I do not believe the few and limited jobs that will be created will offset any of this and this is not in the best behalf of the residents of the State of Minnesota or there would have been more public announcement so people could have the real cost to them for this mining operation. If you believe this to be not the fact then make public on an widely advertised media the cost to benefit ratio the advantages to the State of Minnesota and its residents. This should include all costs and benefits or liabilities now and in the future. Plus why and who would want to stand in the way of a long standing review process other than to prevent the real impact to be unknown so that this known contaminate mining could be approved. It is the your obligation and duty as an official of the USFS to do what you were appointed to do and not by-step your responsibilities to the people of the United States and Minnesota and all other states.

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**Comment Number** LE 452-3

**Commenter Name** Randy Neprash

**Comment** You are aware that PolyMet Mining Corp., a Canadian company, has never actually operated a mine. They propose to use unproven techniques to mine an 800-acre site in a sensitive wetland environment near Hoyt Lakes, in the Lake Superior watershed. In February, 2010, the U.S. Environmental Protection Agency (EPA) stated that PolyMet's draft Environmental Impact Statement (DEIS) described "unacceptable environmental impacts" - particularly in regard to water quality. According to the EPA, the EIS was also inadequate to fully assess the proposal. The Minnesota DNR and the U.S. Army Corps of Engineers produced the DEIS and approved its release.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 452-5

**Commenter Name** Randy Neprash

**Comment** 2. There has been insufficient analysis of the potential loss of the additional BUFFER lands (over and above the mine site) and loss of wetlands, either by mining or surface stockpiling of mine tailings. The additional federal "buffer" lands in the proposed exchange are to facilitate and expedite future mining.

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**Comment Number** LE 457-4

**Commenter Name** Jane Koschak

**Comment** The public interest will not be served in this proposed land exchange to allow for a sulfide metal mine to be located between Babbitt, Minnesota and Hoyt Lakes, Minnesota. Simply stated, the present natural environment of northeastern Minnesota will be destroyed by the proposed mining activity. The destruction of over 1000 acres of high quality, carbon sequestering wetlands, the greatest single loss in the Minnesota history of the Army Corps of Engineers, destroying habitat for birds, plants, and wildlife, would occur along with the loss of thousands of acres of Superior National Forest by a Canadian multinational mining company for a Copper-Nickel Sulfide Strip Mine. This does NOT serve the Public Interest.

How does the USFS think the destruction of 1000+ acres of prime wetlands and thousands of acres of Superior National Forest through sulfide metal mining will serve the Public Interest?

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**Comment Number** LE 457-15

**Commenter Name** Jane Koschak

**Comment** 8. How can the USFS ignore the potential for environmental damage due to exposure of sulfide ores to air and water, and the potential leaching of toxic heavy metals into the environment?

9. How can the USFS ignore contamination from the drilling process itself, including air quality degradation during drilling operations and potential for leakage of gas or oil from equipment and chemicals used in the process, and the auditory pollution from the noise of drilling and heavy machinery?

10. How can the USFS ignore the effects regarding water usage and water contamination as related to mineral exploration and mining?

11. How can the USFS ignore the lack of funding to monitor the extent of exploratory drilling and mining and the necessary future monitoring of the sites for acid mine drainage (AMD)?

12. How can the USFS ignore the acid mine drainage (AMD) that is occurring at the former INCO exploration site on Spruce Road, some 36 years after exploration was completed?

13. How can the USFS ignore the perpetual nature of acid mine drainage and its very controversial aspects?

14. How can the USFS ignore the connection of exploration to mining?

15. How can the USFS ignore the low grade character and disseminated nature of the mineral body or ore which would have gigantic environmental impacts due to the resulting overburden and tailings?

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 477-1

**Commenter Name** Ben Hinz

**Comment** I would like to formally request a new DEIS which is made available to the public. I oppose any land swap, or sale, simply to circumvent existing Federal Legislation.

Whenever critical information is left out or brushed over in a DEIS, there is a problem. With its water-intensive nature and fractured bedrock setting, with little or no protective overburden, northern Minnesota is not a feasible place for sulfide mining.

Whenever critical information is left out or brushed over in a DEIS, there is a problem. With its water-intensive nature and fractured bedrock setting, with little or no protective overburden, northern Minnesota is not a feasible place for sulfide mining.

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**Comment Number** LE 482-3

**Commenter Name** LeRoger Lind

**Comment** We wish to have our previous comments of Feb 29, 2010 on the PolyMet Northmet Project included by reference to these comments. We also question the validity of combining the Land Exchange EIS with the mining project EIS as we would not have had the opportunity to fully scrutinize the Land Exchange EIS for the past few years over which the original DEIS was developed. Subjects such as asbestos fibers in overburden material and volcanic intrusions, wind-driven fugitive dust, water pollution monitoring in hard rock substrates, waste rock storage, acid mine drainage and many other technical issues have been covered and should have been directed at the Land Exchange were it included initially.

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**Comment Number** LE 486-10

**Commenter Name** Peter Dziuk

**Comment** Nowhere is a land exchange measured for the waste disposal consequences that the FS cannot separate itself from politically or geographically. Ground and surface water contamination concerns are not extreme and additional nearby public and private holdings will be impacted – both within the vicinity and downstream. There is high risk inferred to federal lands outside of the exchange acreage, both in the present and a very long term future. There is no mitigation in any land exchange for this failing.

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**Comment Number** LE 490-1

**Commenter Name** Betsy Schaefer

**Comment** We need to protect our common resources, and the beauty of our environment. It is not only a conservation issue, but a public health concern.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 494-1

**Commenter Name** Nicole Gallagher

**Comment** Potential loss of the additional BUFFER lands (over and above the mine site) and wetlands needs to be analyzed. We should assume they will be mined or destroyed by mining - or by the use of the surface for stockpiles, etc. The additional federal "buffer" lands in the proposed exchange are to facilitate and expedite future mining. This needs to be addressed in the EIS.

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**Comment Number** LE 544-1

**Commenter Name** Leslie Pahl

**Comment** The destructiveness of strip mining, and the hazards of sulfide mining in particular, far outweigh any short term benefit that could result. Short term profits accrue to a few owners; the long term costs of destruction of the environment, including water supplies, is passed on to the public. If the actual costs of the mining are determined, I'm confident that the operation becomes unprofitable. Please don't allow this exchange to take place.

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**Comment Number** LE 551-1

**Commenter Name** Wendy Robertson

**Comment** I live within a one-mile radius of the next exploratory drilling site of Encampment Mining to be started 1/11. I can't believe that they will be allowed to destroy the environment for short-term gain. There is nothing okay about sulfide mining and not one company has been able to prove that after ten years (when minining is complete) that there hasn't been water contamination in acid mining drainage.

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**Comment Number** LE 559-1

**Commenter Name** Julia Bohnen

**Comment** In addition, the waste from this inefficient mining process will be stored near sensitive areas and will be a further threat to adjacent wetlands.

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**Comment Number** LE 562-1

**Commenter Name** Rose Tondra

**Comment** If the Land Exchange is approved, people on both sides of the border would lose a pristine forest and swamp habitat which is home to many wild animals, birds and fish. The pollution from this kind of mining would linger far beyond the time that products made from this mineral would be useful. It is not worth it to degrade and toxify so much land which people now enjoy for their rest and relaxation. There is no way to determine how far the pollution would reach, or to what extent the natural air and water purifying functions of the targeted area would be effected. It does not make sense to spend so much money for a short term gain, that would ruin the long term assets of this land as a habitat and recreation area.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 564-2

**Commenter Name** Amanda Meyer

**Comment** It is also likely that the Polymet mine will pollute groundwater in this critical area, causing expensive and irreversible damage to our beautiful North Woods and Superior lake shore. The process used in sulfide mining has been known to produce acidic seepage into the surrounding area. The precious metals are usually found bound to sulfur, forming sulfide minerals. After exposure to air and water, sulfuric acid is formed. This is the same acid that is used in car batteries and is extremely dangerous and corrosive. The pollution can make its way into the groundwater, effectively polluting a huge area in which the groundwater flows.

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**Comment Number** LE 574-10

**Commenter Name** Avangelina Tamis McKnight

**Comment** Nowhere is a land exchange measured for the waste disposal consequences that the FS cannot separate itself from politically or geographically. Ground and surface water contamination concerns are not extreme and additional nearby public and private holdings will be impacted - both within the vicinity and downstream. There is high risk inferred to federal lands outside of the exchange acreage, both in the present and a very long term future. There is no mitigation in any land exchange for this failing.

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**Comment Number** LE 575-2

**Commenter Name** Jan Karon

**Comment** No, because believing that there is new technology to protect the surrounding waters and lands is like believing in Santa Claus. Nowhere has it been proven that there is containment of residue from sulfide mining. The State of Wisconsin, as you know, has legislated that it will give a permit for this kind of mining when it can be proved that there has been containment for 10 years, somewhere. This simply has not been done.

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**Comment Number** LE 581-2

**Commenter Name** Steve Koschak

**Comment** Given the sheer negative nature of the consequences of sulfide metal mining, as illustrated across the world, PolyMet mining company will destroy the environment proposed in the land exchange. In addition to the acid mine drainage which will result in the ultimate pollution and destruction of the entire watershed flowing into Lake Superior, the public will incur a loss of over 1000 acres of high quality wetlands, the greatest single loss of wetlands in the Minnesota history of the Army Corp of Engineers.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 581-3

**Commenter Name** Steve Koschak

**Comment** The federal land proposed for exchange includes habitat for endangered species including the Canadalynx and the gray wolf. The federal land drains into the PartridgeRiver, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. Up to 6,650 acres of the federal land could eventually be exploited for mining.

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**Comment Number** LE 581-4

**Commenter Name** Steve Koschak

**Comment** Excerpted from the EPA letter dated February 18, 2010 to USACE Re: PolyMet NorthMet Project : "EPA finds this project may have substantial and unacceptable adverse impacts on aquatic resources of national importance (ARNI). EPA believes the coniferous and open bogs, comprising a large percentage of the approximately 33,880 total wetland acres, within the Partridge River Watershed to be an ARNI due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin."

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**Comment Number** LE 587-1

**Commenter Name** Alan Muller

**Comment** A sulfide mining project would inevitably result in degradation of ground and surface water quality from leachate from reactive mining wastes. The associated processing activities would result in large amounts of air pollution, in addition to further water pollution. Impacts on wildlife populations would be severe, including to endangered species such as the Canada lynx and the gray wolf. The associated deforestation and industrial emissions would contribute to release of stored carbon dioxide, contributing to climate change threatening the viability of Northern forests.  
The proposed project is incompatible with the attainment of existing air and water quality objectives.

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**Comment Number** LE 587-2

**Commenter Name** Alan Muller

**Comment** It is likely that impacts to wild rice stands and fisheries would be severe, leading to direct economic losses and increased consumption of mercury and other toxins by residents of the area, with associated negative impacts to public health.

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**Comment Number** LE 590-8

**Commenter Name** Richard Watson

**Comment** How can the USFS ignore the history of the Non-Ferrous Mining industry, acid mine drainage, and the perpetual nature of their environmental disasters?

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**Comment Number** LE 590-9

**Commenter Name** Richard Watson

**Comment** How will you guarantee the tourists, hunters, and fishermen who enjoy Northern Minnesota for its wilderness experience, many of whom who do not yet know about this black cloud on the horizon, that you are protecting their interests? How do you meld Non-Ferrous mining and the wilderness experience?

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 591-2

**Commenter Name** John Waterbury

**Comment**            2. It is my understanding the the ore in question is of low sulfur grade - past comparisions to mining projects using ore with different sulfur content is not accurate  
3. It has been reported that PolyMet will be using an autoclave process - I believe this process uses the low grade sulfur as fuel in the heat generation process  
4. I expect the DNR, US Forest and other agencies have sufficient present regulation in place to deal with the tailings basin

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**Comment Number** LE 595-3

**Commenter Name** Dale Tranter

**Comment**            The history of mining in this country and the world, is replete with a multitude of examples that document the on-going and significant damage to the environment caused by mines that stopped being economically viable decades ago. Short term economic benefits were pursued at the cost to our environment. In fact, the relatively few cleanups now being undertaken are being funded in large part by generations of people unborn when the short-term benefits were received.

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**Comment Number** LE 608-2

**Commenter Name** Cheryl Dannenbring

**Comment**            The history of sulfide mining shows there is no safe way to contain the acid drainage from the mine tailings. Even the test drilling (which the state is allowing with no EIS) has inherent dangers. Water will leach through the drill shafts and ground water will inevitably be contaminated. Ground water tables can be lowered, compromising surrounding wetlands. The burying of the tailings from the test drill sites means further pollution of ground water.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 610-3

**Commenter Name** Cheryl Dannenbring

**Comment** I understand this proposed exchange will facilitate the establishment of strip or open pit mining of rare metals, as this type of mining is not permitted within the Superior Ntl. forest. It also will facilitate road building into the mine sites. All of this will culminate in thousands of acres of denuded land which will become huge tailing sites. I know that the percentage of precious ore to overburden is less than one percent. The image of the waste produced by these mines is staggering. Deforestation will increase sedimentation in waterways. We will lose the forests ability to cleanse water percolating to the water table. We will lose the cleansing power of the forest itself regarding air quality. Acid drainage will inevitably seep through to water tables, to lakes and streams. As you well know, the sulfide compounds produced by these mines remain toxic well into the future, much longer than any mining company is going to be held responsible for damage. In essence, we would be trading off one of the most pristine parts of the whole country for the profits of the mining interests.

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**Comment Number** LE 611-2

**Commenter Name** Linda Glaser

**Comment** I understand this proposed exchange will facilitate the establishment of strip or open pit mining of rare metals, as this type of mining is not permitted within the Superior Ntl. forest. It also will facilitate road building into the mine sites.

All of this will culminate in thousands of acres of denuded land which will become huge tailing sites. The image of the waste produced by these mines is staggering. Deforestation will increase sedimentation in waterways. We will lose the forest's ability to cleanse water percolating to the water table. We will lose the cleansing power of the forest itself regarding air quality. Acid drainage will inevitably seep through to water tables, to lakes and streams. The sulfide compounds produced by these mines remain toxic well into the future, much longer than any mining company is going to be held responsible for damage.

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**Comment Number** LE 615-2

**Commenter Name** LeRoy DeFoe

**Comment** Also, after discussing this issue with my colleagues on numerous occasions, we are all aware that sulfide ore, plus water, plus air, produces Sulfuric Acid.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 615-3

**Commenter Name** LeRoy DeFoe

**Comment** From a mining operation this big, the run-off from the used ore storage area, will eventually reach the nearby rivers and the streams and kill everything in its path. Do you need to be reminded that at the Dunka Pit, the sulfide ore storage area from a botched sulfide ore open pit mine, from over 30 years ago, is still a Brownfield Site?

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**Comment Number** LE 617-2

**Commenter Name** Andrea Gelb

**Comment** I understand this proposed exchange will facilitate the establishment of strip or open pit mining of rare metals, as this type of mining is not permitted within the Superior Ntl. forest. It also will facilitate road building into the mine sites. All of this will culminate in thousands of acres of denuded land which will become huge tailing sites. I know that the percentage of precious ore to overburden is less than one percent.

The image of the waste produced by these mines is staggering. Deforestation will increase sedimentation in waterways. We will lose the forest's ability to cleanse water percolating to the water table. We will lose the cleansing power of the forest itself regarding air quality. Acid drainage will inevitably seep through to water tables, to lakes and streams.

As you well know, the sulfide compounds produced by these mines remain toxic well into the future, much longer than any mining company is going to be held responsible for damage. In essence, we would be trading off one of the most pristine parts of the whole country for the profits of the mining interests.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 625-1

**Commenter Name** Paul and Susan Schurke

**Comment** Like many Ely residents, we gave the Canadian company Polymet the benefit of the doubt when they promised us a new day for mining and a new way to "do it right." The Iron Range needs jobs and the world wants copper so it seemed the Polymet proposal was a dewdrop from heaven. Plus, they promised us that all our concerns would be answered in their Environmental Impact Statement.

But then their draft EIS was deemed unacceptable by our oversight agencies. They found a lot of devils in the details. And while most of the scientific and legal jargon in this 1,000-page report is beyond us, one of the details did catch our attention. On page 4.1-84, the report concedes that this project may leach toxins into our ground water for "over 2,000 years." How long does Polymet propose to deal with this problem? "45 years." What provisions are proposed for dealing with it after that? None.

Wow! What a confidence killer that revelation is on our hopes for this project. We just hope we're still lucid enough in 45 years to explain to our great grand children why they can no longer drink the water here.

"Over 2,000 years" is essentially forever. Some states prohibit mines that require such perpetual care. Other states require that such risky projects include financial assurance that covers treatment in perpetuity. Minnesota has neither of these safeguards in place. Yet we're being asked to be the guinea pig for a type of mining that has never been attempted by a company that has no mining experience.

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**Comment Number** LE 626-1

**Commenter Name** G Benjamin Hocker

**Comment** And I fear the probability that the impact of this type of mining, with large quantities of toxic minerals, will reach well beyond the area considered here.

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**Comment Number** LE 627-9

**Commenter Name** Betsy Daub

**Comment** Proposed mine activities would result in permanent storage of reactive waste rock above ground, with DEIS projected pollution for as much as 2,000 years. Groundwater criteria for a number of contaminants are expected to be exceeded according to the DEIS. Storage of overburden and peat are also projected to promote the methylation of mercury. The West Pit, to be located on the federal lands now under proposal for exchange, would eventually flood with groundwater, precipitation and surface runoff, and overflow into the Partridge River, a tributary to the St. Louis River. This overflow is expected to contain mercury, arsenic, cobalt and selenium in exceedance of water quality standards. Much of the St. Louis River downstream from the Partridge and Embarrass Rivers are already listed as mercury impaired. The mine project would compound an already serious contamination issue for this watershed.

The Friends in our DEIS comments, as well as the U.S. Environmental Protection Agency (EPA) in their comments on the DEIS, indicate areas where proposed mitigation measures are unproven or inadequate to address these and other pollution sources. The failures were a factor in the EPA giving the NorthMet project its lowest ranking of Environmentally Unsatisfactory, Inadequate. This is a rating the EPA gives less than one percent of the time to projects of this type. It signifies that the project as currently proposed represents significant threats to the watershed.

## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 627-15

**Commenter Name** Betsy Daub

**Comment** The federal lands within the proposed exchange are located within 300 km of four Class I regions. Under the Clean Air Act, Class I airsheds were established as areas where emissions of particulate matter and sulfur dioxide are to be restricted. Class I areas include federal wilderness areas exceeding 500 acres and national parks. These are places that are allowed only the smallest incremental pollution levels above baseline conditions. The four Class I areas within the vicinity of this project are the Boundary Waters Canoe Area Wilderness, Rainbow Lakes Wilderness, Voyageurs National Park, and Isle Royale National Park.

The emissions modeling described in the DEIS for the NorthMet project, show this project contributing 30 tons per year (tpy) of SO<sub>2</sub>, 159 tpy of NO<sub>x</sub> and 1,175 tpy of PM<sub>10</sub>. These emissions would come primarily from crushing and grinding ore, handling reagents and materials and the flotation and hydrometallurgical processing (DEIS pg. 4.6-53 and 54). The DEIS acknowledges that these emissions will cause visibility impairment for as much as 23 days a year in the Boundary Waters Canoe Area Wilderness. The NorthMet project may result in a 5% visibility impact in the BWCAW for 23 days a year, and as much as a 10% impact for one day a year (DEIS pg. 4.6-37).

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**Comment Number** LE 627-16

**Commenter Name** Betsy Daub

**Comment** This is not an insignificant level of impairment from a single project. The Minnesota Regional Haze State Implementation Plan (SIP) is a plan developed by the Minnesota Pollution Control Agency as required by the Regional Haze Rule of 1999. The goal of the SIP is to reduce haze in Class I areas affected by Minnesota emissions, and to reach natural visibility conditions by 2064. The SIP was submitted to the EPA for review on December 30, 2009. The Haze SIP notes that a 5% or more contribution to visibility impairment from an entire state would be considered significant. The NorthMet project, as described in the DEIS, would contribute a 5% visibility impairment for as many as 23 days, and a 10% impairment for one day per year.

Emissions contributions of this level are keeping Minnesota from making progress toward the goals outlined in the SIP. Even the DEIS concedes that the state is not likely to reach the visibility goals. "Current MPCA estimates indicate that emission reductions at power generation facilities and additional reasonably foreseeable projects in northeastern Minnesota are not enough to meet the current Regional Haze SIP goals" (DEIS pg. 4.6-54). The air visibility quality in the BWCAW shows a trend of becoming worse, not better. Between 1992 and 2006, visibility in the wilderness on the 20% worst days showed a worsening trend. The NorthMet project will add to the downward trend for air visibility quality over Minnesota's Class I Areas and impede reaching the goal of natural visibility conditions by 2064 as the Regional Haze Rule requires.

Within the DEIS, mitigation measures are discussed, but many eliminated from further discussion without explanation. The DEIS mentions the use of low-NO<sub>x</sub> burners in the heaters, the conversion to electric heating, and the use of waste heat for work space heating requirements. But each of these was eliminated and excluded from modeling. Missing are explanations for why these measures were found to be "infeasible or non-viable" for the project.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 627-44

**Commenter Name** Betsy Daub

**Comment** The destruction of the peatlands at the PolyMet mine site runs counter to the recommendations of both of these government-initiated studies.

The DEIS acknowledges the impacts in CO2 emissions from wetland losses and other destruction of vegetation. "In addition, secondary emissions from the change in the existing land cover are projected. CO2 emissions from carbon stock loss (i.e., wetland vegetation, trees and peat) due to the excavation of wetland and deforesting of the project area, as well as the loss in CO2 sequestration from the affected land cover disturbances of the wetlands, forests, and peat storage would occur..." (DEIS pg. 4.6-31).

The DEIS notes that "...the Project would increase the CO2 emissions in the atmosphere" (DEIS pg. 4-6-32), but it does not put this increase in a statewide context. The EIS fails to describe how much the project would add to Minnesota's overall greenhouse gas emissions.

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**Comment Number** LE 627-52

**Commenter Name** Betsy Daub

**Comment** Natural Resources in a Socially and Environmentally Acceptable Manner - EPA Concerns  
Should the exchange take place, it would enable the development of a mine that the EPA has found to be one of the poorest planned projects it has reviewed. In their February 18, 2010 comments, the EPA ranked this project as Environmentally Unsatisfactory, Inadequate. This is a rating given by the EPA less than one percent of the time on projects of this type. It is a failing grade based on a plan that adverse environmental impacts of significant magnitude, unsatisfactory water quality impacts on a long-term basis, and wetlands mitigation plans that fail to address impacts. The EPA found that the analyses were inadequate to fully understand the scope of potential impacts from this project. These are long-lasting, significant outcomes from a poorly conceived project. And the impacts are projected to occur beyond the federal lands the proposal would grant to PolyMet. The exchange has implications for an entire watershed, its people and its wildlife.

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**Comment Number** LE 627-53

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
The DEIS as currently conceived is a project that would extract natural resources in a socially and environmentally unacceptable manner. The Forest Service's analysis should reveal the areas where the impacts are unacceptable. Changes to the project in the SDEIS should be used by the Forest Service to assess if the impacts have been made socially and environmentally acceptable. The Forest Service needs to outline how this exchange would help it meet its Forest Plan Goal of contributing to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 627-54

**Commenter Name** Betsy Daub

**Comment** Natural Resources in a Socially and Environmentally Acceptable Manner- Human Health  
Fish consumption advisories already occur for fish caught from many of the water bodies into which the mine project would drain. For many people, fish constitutes an important nutritional and/or cultural part of their diet. People consuming more than one fish a week from impaired waters, or fish with higher levels of mercury than 0.2 mg/kg, are at risk of harming their health.

The NorthMet project with its potential for increasing the mobilization of mercury, poses a human health risk to people who consume fish.

Recommendation:

The Forest Service must fully examine what the land exchange might mean for adding additional contaminants that could lead to impacts on human health from fish consumption. It must examine how this exchange helps it meet its Forest Plan Goal of contributing to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner.

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**Comment Number** LE 627-55

**Commenter Name** Betsy Daub

**Comment** Contribute to Local, Regional, and National Economies- Socioeconomic Impacts  
The DEIS presents a one-sided evaluation of impacts to communities and economies in the region. The only potential negative impacts from the project cited in the DEIS are that "the Project would further reduce access to the site for hiking, fishing and hunting" and "generate some noise and light which may impact the recreational experience," and "some impacts may experienced by recreational users of Whitewater Reservoir due to water fluctuations" (DEIS pg. 4.10-21).

Absent from the DEIS is a meaningful assessment of other potentially negative impacts. Missing, for example, is any analysis of impacts to tourism and recreation, impacts on real estate values and sales, impacts to commercial fisheries if mercury contamination occurs.

The Superior National Forest estimates that these public lands bring over \$200 million in tourism and recreation to the region annually (personal communication, Jim Sanders, Supervisor, SNF). But the DEIS provides no evaluation of this project's potential impacts on this sustainable, important industry.

The DEIS is devoid of any evaluation of reasonably foreseeable negative impacts, such as the impacts to communities from potentially contaminated drinking water, and impacts on fisheries from mercury contamination. There is not even an analysis of the impact on communities, schools, and the tax base when the mine closes in Year 20. This biased representation of impacts is not fair to those communities most directly affected by the mine's closure.

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**Comment Number** LE 644-1

**Commenter Name** Betty Meados

**Comment** Strip mining for sulfide has never before been done in Minnesota before. The process releases acid and toxic metals that can pollute rivers and groundwater for hundreds of years.

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 662-1

**Commenter Name** Debra Greenblatt

**Comment** Once these critical habitats and other impacted areas are gone we are unlikely to bring them back. Knowing how each wetland, forest and open space effects the areas around it, we are inviting problems by introducing toxins and disruption from this type of mining.

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**Comment Number** LE 665-1

**Commenter Name** Paul Greenblatt

**Comment** I am also am extremely concerned about contamination of ground water. The pollution of waters with cooper and nickel sulfides could have devastating effects on both humans and wildlife that will be very difficult to reverse. Let us not act out of haste and recognize all the impacts before making final decisions!!

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**Comment Number** LE 681-2

**Commenter Name** Patricia Holmes

**Comment** I am appalled that if approved, this project, the largest permitted destruction of wetlands since the Saint Paul District of the Corps began permitting wetland fill, will permanently defile our state's resources in exchange for some jobs that will be short-lived and will disappear once the mining is finished. I understand from research I've done on this project that the sulfide pollutants can persist for decades as the waste piles are exposed to water and oxygen.

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**Comment Number** LE 692-1

**Commenter Name** Pat Owen

**Comment** In addition to the (I'm assuming) routine questions about environmental impact, I would ask PolyMet to give you the opportunity to visit and review at least three sites where this company has mined and successfully contained/cleaned up their operation. I am basing this on the following statement in the Pioneer Press newspaper article (11/26/10)

"Company officials say, and the environmental impact statement proposes, that the rock in the proposed mine area is unusually low in sulfur for a copper deposit. They also contend that they can take precautions when digging and storing rock and by using new technology to minimize acid runoff while treating any runoff that occurs."

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**Comment Number** LE 698-1

**Commenter Name** Daniel Vincent

**Comment** The damage is not worth the "gain" that we would receive from allowing this mine to exist in our state. The effects will last longer than my children will live and that is something I will not accept, especially when it profits a handful of people only. Not to mention people not even from this country/state....

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## MPD      Mine Project and DEIS Issues

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**Comment Number** LE 704-5

**Commenter Name** John Roth

**Comment** Fifth, the planned usage of the exchanged federal land cannot in any way cause harm to adjacent federal property or the forest as a whole. If the proposed future usage will increase air or water pollution or result in some other harm, the full cost of that potential harm must be determined and mitigated. Even if there is only a risk of harm, the cost of that risk must be calculated and compensated for, as well. For example, if the intended use of the federal land poses a 10% risk of increased water pollution and it would cost \$50 million in damages if the pollution occurred, the Forest Service should get non-federal land valued sufficiently to cover the value of that risk. Alternately, the private party should be required to obtain for the Forest Service a bond covering the projected costs for any necessary clean-up or mitigation.

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**Comment Number** LE 704-8

**Commenter Name** John Roth

**Comment** To cover the risk of increased pollution caused by PolyMet's mining proposal, PolyMet should be offering significantly more land to the Forest Service and/or agreeing to obtain a pollution mitigation bond to cover the cost of any resulting pollution.

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**Comment Number** LE 874-1

**Commenter Name** Diadra Decker

**Comment** Financially, it would create a huge windfall for a foreign company at the expense of the American people, which is legally prohibited. And sulfide mining activities likely would leave behind both, unacceptable long-term environmental impacts and financial liability. Neither, the ecological nor the market values of the federal and non-federal lands have been accurately assessed, and they must be characterized in detail. The potential adverse effects on groundwater quantity and quality of allowing open-pit mines in this location must be determined by empirical testing, not mere modeling.

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## MRK      Market Value

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**Comment Number** LE 001-2

**Commenter Name** Larry Adams

**Comment**            The exchange of this high-quality federal forest and wetlands to allow PolyMet's open pit mine would result in an enormous benefit to a private corporation and a huge loss to the public, harming natural resources important to Minnesota, the Great Lakes Region, and the entire nation.

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**Comment Number** LE 001-4

**Commenter Name** Larry Adams

**Comment**            The federal land that would be lost includes thousands of acres of high quality wetlands and habitat for endangered species including the Canada lynx and the gray wolf. The federal land drains into the Partridge River, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. Up to 6,650 acres of the federal land could eventually be exploited for mining.

In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, has few minerals and much of it has been heavily logged. For the taxpayer as well as for the environment, the PolyMet Land Exchange would not be a fair trade.

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**Comment Number** LE 001-5

**Commenter Name** Larry Adams

**Comment**            •      The SDEIS must value the federal land based on the market for minerals exploitation to avoid giving the PolyMet Company a windfall profit. The non-federal land proposed in the Land Exchange is unlikely to have anything approaching equal monetary value.

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**Comment Number** LE 001-9

**Commenter Name** Larry Adams

**Comment**            If its private benefits and public costs are fairly analyzed, the PolyMet Land Exchange must be rejected. Thank you for considering my views

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**Comment Number** LE 006-3

**Commenter Name** Janet Asanchev

**Comment**            If its private benefits and public costs are fairly analyzed, the PolyMet Land Exchange must be rejected. Thank you for considering my views,

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**Comment Number** LE 009-2

**Commenter Name** Wanda Ballentine

**Comment**            The idea that land of equal value will be traded for the 6,650 acres of the Superior National Forest is ludicrous. The land was designated a national forest for a reason - that it is of particular value. It includes thousands of acres of high quality wetlands and habitat for endangered species such as the Canada lynx and the gray wolf, and is also a part of the heritage of local native Americans . Poly Met wants to trade for land that is mostly outside the Lake Superior Basin that has been heavily logged - not even close to a fair trade.

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## MRK      Market Value

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**Comment Number** LE 009-4

**Commenter Name** Wanda Ballentine

**Comment** The value of the federal land should be based on the market for minerals exploitation to avoid giving the PolyMet Company a windfall profit. I doubt that the land proposed in the Land Exchange will be anywhere near as valuable.

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**Comment Number** LE 009-5

**Commenter Name** Wanda Ballentine

**Comment** Meanwhile, PolyMet's proposed open pit sulfide mining and potential exploitation of the entire site clearly means that the public will lose an enormous amount in an exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 009-7

**Commenter Name** Wanda Ballentine

**Comment** I believe that an accurately done SDEIS will find that the land swap proposal would create a private windfall for PolyMet while creating a huge, long-term financial and pollution liability for the public, t say nothing of the loss of the many non-tangible values of the area to wildlife, humans and tribal culture.

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**Comment Number** LE 023-2

**Commenter Name** Thomas Brinkman

**Comment** The land swap proposal would create a private windfall for PolyMet while creating a huge, long-term financial and pollution liability for the public.

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**Comment Number** LE 052-2

**Commenter Name** William Dustin

**Comment** Sulfide mining on the boundary of this area will destroy its wilderness character. Consequently the issue of property rights must be given the most serious consideration when evaluating this land transfer. The Superior National Forest and the Boundary Waters were established for the enjoyment of all U.S citizens and they are supported and maintained by the taxpayers. The proposed land transfer is not simply a transfer of land; it is a transfer that will radically change the character of the land and how it is used. It also involves giving away a non-renewable resource, the use of which has a permanent and adverse impact on the other resource values the area provides. Therefore, how are present and future citizens to be compensated for a private, foreign corporation's use of this non-renewable resource? How are they to be compensated for the lost opportunities that the mining of these minerals necessarily entails? And how are they to be compensated for the inevitable pollution and other negative externalities associated with sulfide mining? Because of all these adverse impacts, this is not a land transfer of equal value. The acreage may be equal, but that is all. A fair evaluation of the transfer must consider all the costs involved, and many of these costs cannot be evaluated in the simplistic monetary terms of cost-benefit analysis.

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**Comment Number** LE 053-3

**Commenter Name** Jeff Kopp

**Comment** 2) Have the appraised values been established? If so, do you feel the Forest Service is getting the better deal instead of old mining land?

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**MRK      Market Value**

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**Comment Number** LE 053-4

**Commenter Name** Jeff Kopp

**Comment**            3)In resect to the larger piece near Biwabik...will it be developed by the Forest Service?  
  
4) Same question to the one by the lake?(camping)

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**Comment Number** LE 063-10

**Commenter Name** Kristin Larsen

**Comment**            The beneficiaries of this land exchange will be a Canadian based multinational corporation with shareholders around the world. A small percentage of our citizens may gain jobs as a result of this exchange but far more will suffer from health impacts, from loss of property value, from loss of quality of life and in time, the weight of the imbalance will shift to the side of harm to the people and away from the interests of our nation. You cannot and must not attempt to make a false separation of the fact that this land, if exchanged, is going to be used for a purpose that was contemplated and is barred by OUR, the People's stipulations set forth in the purchase of this land.

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**Comment Number** LE 063-12

**Commenter Name** Kristin Larsen

**Comment**            The land was purchased by our nation and the value of that land must be recognized in the most profound manner, it is the exact kind of land you should be acquiring. This land is an aquatic resource of national importance "due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin." The land is valuable because of where it is and because of its naturally created profound protective functions for the watershed. Its value is not just the current value of similar land but of this land positioned as it is - protecting the headwaters. To say you can substitute other land is akin to saying that 4 kidneys distributed among 2 persons, with 4 being in one body and 0 being in another body means the same as 2 kidneys in each body - and you can't just put a kidney in a foot and hope things work out - the watershed is as it is naturally for a reason - to purify and protect the great waters. You can't exchange wetlands in the manner you are attempting to do without harm to the greater ecosystem. The functions performed by the land are protective of the water - permanently - and do not have a cost to the public. We don't have to pay to have the headwaters purified - the land does that. This is the most important function that land can perform - and to ignore that is wrong and impermissible. Multiple parcels of land are being considered in this exchange, these multiple pieces are of far less value to the ecosystem and thus to the nation and its people.

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**Comment Number** LE 148-1

**Commenter Name** Margot Monson

**Comment**            From an economic standpoint, the exchange of high quality federal forest and wetlands for non-federal land that has few minerals, some of which has been heavily logged, is simply not an equitable trade for taxpayers nor the environment. The result will be a large and comparatively short term benefit to a private corporation compared to the greater loss and, in many cases, permanent harm to natural resources valuable to Minnesota, the Great Lakes region, the BWCA, and our nation.

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**Comment Number** LE 183-2

**Commenter Name** Marlise Riffel

**Comment**            The exchange will benefit a private corporation and will lose resources for the public. I'm part of the public.

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## MRK      Market Value

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**Comment Number** LE 227-11

**Commenter Name** Matthew Tyler

**Comment**      •Correct appraisals of the value of all properties involved that accurately reflect current and proposed land use, as described in detail by WaterLegacy.

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**Comment Number** LE 227-16

**Commenter Name** Matthew Tyler

**Comment**      •The Feasibility Analysis inappropriately concludes that there is a net gain in lake area to the Superior National Forest, even though all waters are already held in trust by the state of Minnesota. While it might be appropriate to quantify an increase in public lake access, it is not appropriate to credit as gain water rights that can not be transferred to the U.S. Forest Service.

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**Comment Number** LE 227-20

**Commenter Name** Matthew Tyler

**Comment**      For the land exchange to preserve the Federal estate and to protect water quality pursuant to the Forest Plan, the wetlands on the Private Lands must provide an equivalent degree of ecosystem services to those on the Federal lands.

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**Comment Number** LE 249-7

**Commenter Name** Darren Vogt

**Comment**      It may be difficult or impossible to structure a land exchange for another contiguous parcel of about equal size, but we have concern if the values of the federal and non-federal lands are equal. It is our understanding that land exchanges are done on a value-to-value approach based on appraisals of property values. We question if the value of a contiguous parcel is properly addressed. Further, resource value of what is being lost on the federal ownership should also be a consideration. If this project moves forward, a net loss of resources (wetlands, plants, wildlife habitat, cultural resources, etc.) will result as the mine is developed.

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**Comment Number** LE 250-4

**Commenter Name** T.E. Alget

**Comment**      PolyMet has offered more than 7,000 acres of prime forest land in order to secure the surface ownership of about 6,600 acres at its mine site. This land has been logged over, is not accessible to the public and is surrounded by active mines, railroads and high-voltage power lines.

The exchange will provide the Forest Service with more wetlands, lakes, forests - all accessible to the public

It's a great deal for the Forest Service and for the public interest it represents. It's a great deal for PolyMet because the company gets to move forward with its plans to develop and build a mining and processing operation. And it's a great deal for the public because not only will we have greater resources to enjoy, we will also have the jobs that will allow us to stay in the area and enjoy them.

Please move forward quickly to complete the land exchange.

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## MRK      Market Value

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**Comment Number** LE 253-1

**Commenter Name** Aaron Anderson

**Comment** The proposed land exchange is a good idea as the mine slite lands are inaccessible to the public and land to be exchanged will enhance current Forest Service tracts.

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**Comment Number** LE 256-1

**Commenter Name** Bill Brice

**Comment** It appear that the parties have done a good job matching the lands the FS is receiving with the types of lands the are giving up.

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**Comment Number** LE 266-2

**Commenter Name** Janet Draper

**Comment** which would convert 6,650 acres of federal land from public to private ownership. This would remove the environmental review and protections from this area of over 1000 acres of high quality wetlands and thousands of acres of forest.

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**Comment Number** LE 277-4

**Commenter Name** Nancy Schuldt

**Comment** The Federal Land Planning and Management Act (FLPMA) requires that National Forest System lands may only be exchanged for lands of equal value (43 U.S.C. §1716(a); 36 C.F.R. 254.12(a)). The policy is intended to avoid conferring an inequitable private benefit and the resulting public loss when exchanging federal for non-federal estates. However, the valuation of the federal estate appears to have been made without considering the future use of the property; i.e., the mining project described in the PolyMet DEIS and the de facto purpose for the land exchange. A full consideration of the fair market value and future use of the federal land in the proposed PolyMet Land Exchange would recognize a private windfall instead of an equal exchange, in violation of federal statutes, rules and policies. It is apparent from aerial photography that extensive clear cutting of timber has occurred on the non-federal land, and that there are three unauthorized dump sites on the Hay Lake non-federal tract, both of which may also reduce the public value of the non-federal lands.

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**Comment Number** LE 280-8

**Commenter Name** Esteban Chiriboga

**Comment** GLIFWC staff are concerned that the wetlands in the Hay Lake and other parcels, may not be of equal quality or provide equivalent functions and values. As previously indicated, water quality in the wetlands are important data needs for the NEPA process. In addition, the wetlands in the exchange parcels should be delineated and the functions and values determined to the same level of detail as the wetlands in the area of the proposed mine. The FA indicates that the federal estate would have a net loss of 1472 acres of wetlands if the exchange were approved. It is important to know the nature of the loss and gain in wetland quality, functions and values on public lands.

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## MRK      Market Value

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**Comment Number** LE 282-2

**Commenter Name** Paula Maccabee

**Comment** The proposed exchange of surface rights to approximately 6,650 acres of the Superior National Forest does not meet the threshold requirements of federal law. The valuation of the Federal estate appears to have been made without considering the future use of the property, which mining project is detailed in the PolyMet DEIS and is the sole purpose for proposing this land exchange. Considering the fair market value and future use of the Federal land, the proposed PolyMet Land Exchange would produce a private windfall, rather than an equal exchange, in violation of federal statutes, rules and policies.

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**Comment Number** LE 282-6

**Commenter Name** Paula Maccabee

**Comment** 1. The SDEIS Must Provide Detailed Information Regarding PolyMet's Proposed Uses of the Federal Land for Mineral Exploitation and the PolyMet Land Exchange Must be Rejected if the Fair Market Value of Federal and non-Federal Lands is Not Equal Considering Future Use of the Federal Lands.

### SUMMARY

Federal statutes and rules preclude an exchange of Forest Service land for non-federal land unless the non-federal land is of equal value. A discrepancy of more than 25 percent in value may not even be compensated with cash payments. Federal rules, Uniform Appraisal Standards and case law consistently provide that the value of land must include the fair market value considering the use to which the land would be put, including mineral exploitation. The SDEIS must evaluate the Federal and non-Federal estates, applicable deeds, and the proposed use of the Federal lands for which the PolyMet Land Exchange is contemplated, along with other factors affecting fair market value. If this analysis were done with anything approaching reasonable rigor, the PolyMet Land Exchange would be found to violate federal statutes enacted to protect public lands and prevent private windfalls.

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**Comment Number** LE 282-7

**Commenter Name** Paula Maccabee

**Comment** The Forest Service Feasibility Analysis suggests that a comparison was made between features of the surface of the Federal land and the surface of the non-Federal land, without reference to the future use of the Federal land for the PolyMet mining project. The single page in Feasibility Analysis Section 7.3 Valuation Feasibility Opinion, seems to comment only on the gross similarities of size of the tracts, without any reference to mining proposed on the Federal land:

In my opinion, the Non-Federal lands do not deviate more than 25% from the value of the Federal Tract. However, the balance is likely approaching the Non-Federal lands being 25% less than the Federal lands, with some potential risk for exceeding that limit. The Federal Tract and Non-Federal Hay Lake Tract are relatively similar and fall within a similar value range per acre. The Non-Federal Wheaton Tract appears to have sufficient value to compensate for the smaller size of the Hay Lake Tract compared to the Federal Tract, bringing the exchange into sufficient balance. (emphasis added).

Forest Service staff at the information sessions for the PolyMet Land Exchange confirmed that the market value to PolyMet of the Federal land due to its potential for lucrative mining activities had not been considered in the Feasibility Analysis.

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**MRK      Market Value**

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**Comment Number** LE 282-8

**Commenter Name** Paula Maccabee

**Comment** To analyze value, it is significant that the deed for the Federal land proposed for the PolyMet Land Exchange only contemplates underground mining and protects surface lands, stating:

2. In prospecting for, and in mining and removing minerals, oil and gas, and in manufacturing the products thereof, only so much of the surface shall be occupied, used or disturbed as is necessary for the purpose.

3. In underground operations all reasonable and usual precautions shall be made for the support of the surface, and to that end tunnels, shafts or other workings shall be subject to inspection and examination by the Forest Officers, Mining Experts or Inspectors of the United States.<sup>6</sup>

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**Comment Number** LE 282-9

**Commenter Name** Paula Maccabee

**Comment** From the perspective of evaluating market value of the Federal land, the exchange is a but-for condition, without which the PolyMet company or another private owner or successor in interest would be unable to pursue an open pit mine.

Considerable research and investment has been made in demonstrating the market and feasibility of extraction of minerals from the Federal site proposed for the PolyMet mine. Based on the draft EIS, output from extraction of minerals from the PolyMet mine would exceed \$276 million by the third year of operation. (DEIS, p. 4.10-26). That is an enormous private benefit. To consider the Federal land as merely surface land comparable to non-Federal open lands is willful and illegal blindness.

Total mineral exploitation from the Federal lands could exceed even this substantial output. The Federal Register Notice for the Land Exchange described the exchange of 6,650 acres of Federal land as necessary in order to “eliminate conflicts if minerals development were to expand in the future.” (pp. 62757-62758). The Feasibility Analysis notes that, in addition to the Duluth Complex formation proposed for the PolyMet NorthMet mine, the Federal lands include Biwabik Iron Formation on the north portion of the Federal lands. This formation is being mined for iron ore by the Northshore Mining Company on the northern edge of the project area. (Feasibility Analysis, Mineralization Section 11,7 Fall 2010 Update, p. 4).

The Feasibility Analysis states that no developments of any kind are planned on any of the non-Federal lands. (Feasibility Analysis, Summary Section 1,8 p. 6). The mineral potential of most of the non-Federal land is low. Describing two tracts that make up the bulk of the non-Federal acreage, the Feasibility Analysis concluded, “The mineral formations beneath the Hay Lake tract are generally considered to be of low potential for economic development. The McFarland tract in Cook County is underlain by gabbroic and sedimentary formations. The mineral potential is also considered low.” (Feasibility Analysis, Summary Section 1, p. 12). The more recent Fall 2010 Update confirms low mineral potential on the Hay Lake Tract, the Hunting Club Lands and the McFarland Lake tract, comprising 4,842 acres or 72 percent of the non-Federal land. No geologic investigation has been done for the remaining two non-Federal tracts, and no plans for mineral development on these sites have been identified. (Feasibility Analysis, Mineralization Section 11, Fall 2010 Update, pp. 4-5).

It strains credulity to believe that the value of the Hay Lake and other non-Federal parcels, presumably as open land, comes anywhere close to the value of the Federal land slated for a major international mining operation.

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## MRK      Market Value

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**Comment Number** LE 282-12

**Commenter Name** Paula Maccabee

**Comment**      The SDEIS for the PolyMet Land Exchange must contain the following:

- ☐ A comprehensive and rigorous valuation of the fair market value of the Federal land, including its proposed use for the PolyMet open pit mine, acknowledging that private control of the Federal surface estate is a but-for condition of the development of a mine project projected to have \$276 million per year in output within three years.
- ☐ The valuation of the fair market value of the Federal land should also examine the potential for mining uses on the balance of the Federal land, including the feasibility of iron ore extraction from the Biwabik formation in conjunction either with the PolyMet Project or other nearby mining uses.
- ☐ Assessment of valuable resource conditions on the Federal estate, including undisturbed forest and wetland resources.
- ☐ Analysis of the likely and feasible proposed use of the non-Federal lands absent the land exchange and if the land exchange were to take place.
- ☐ Assessment of conditions on non-Federal land potentially diminishing their public value, including divided estates, clear-cutting of forests and previous disturbance of wetland and upland resources.

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**Comment Number** LE 282-14

**Commenter Name** Paula Maccabee

**Comment**      Based on the information available in the PolyMet DEIS and the Forest Service Feasibility Analysis, it appears that there is no reasonable scenario under which the non-Federal land even approaches the fair market value of the Federal land. The PolyMet Land Exchange would provide PolyMet with an enormous private windfall at the expense of the public and the taxpayer, failing the threshold legal standard for a land exchange under the Federal Land Planning and Management Act.

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## MRK      Market Value

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**Comment Number** LE 282-17

**Commenter Name** Paula Maccabee

**Comment**      The Forest Service Handbook contains parallel language:  
The public interest determination must show that the resource values and the public objectives of the non-Federal lands equal or exceed the resource values and the public objectives of the Federal lands and that the intended use of the conveyed Federal land would not substantially conflict with established management objectives on adjacent Federal lands, including Indian trust lands. F.S.H. 5409.13, § 33.41b.

Recent case law has confirmed that the actual use to which federal lands will be put must be considered in determining whether a land exchange complies with the applicable resource management plan and that amending a resource plan is, itself, a major federal action. In *Ctr. for Biological Diversity v. United States Dep't of the Interior*,<sup>10</sup> the Court of Appeals reversed a land exchange for mining purposes authorized by the Bureau of Land Management (BLM).

The *Ctr. for Biological Diversity* case arose out of plans by the Asarco mining company to obtain fee simple ownership of Bureau of Land Management (BLM) lands in Arizona on which they owned mineral rights in order to excavate and process approximately three billion tons of materials. The BLM assumed that mining was the foreseeable use of the federal land, whether or not the land exchange took place, and the final environmental impact statement (FEIS) supporting the BLM record of decision made no comparative analysis of the impacts of mining activities under the action and no action alternatives.

The Court of Appeals in its 2009 decision rejected both the FEIS and the BLM land exchange due to the failure of the FEIS to analyze differential environmental impacts from the foreseeable use of the land. The Court stressed that even if mining would take place under either alternative, a Mine Plan of Operation would be required if the land were under BLM ownership, potentially affecting the manner and intensity of mining activities if the exchange were to proceed. The Court's ruling was challenged and the case reheard before the entire Ninth Circuit panel, which confirmed the prior decision rejecting both the FEIS and the BLM land exchange due to failure to consider a change in the proposed use of the federal land.

In holding that the proposed land exchange violated both the Federal Land Planning and Management Act (FLPMA) and the National Environmental Policy Act (NEPA), the Court also stated that changes in the resource management plans for the federal land from Long - Term Management Area retention to "disposal" were "prerequisites to the conveyance of the selected lands from public ownership" and themselves constituted a "major federal action" requiring NEPA analysis. *Ctr. for Biological Diversity v. United States Dep't of the Interior*, 2010 decision, *supra* at pp.15, 35.

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**Comment Number** LE 282-41

**Commenter Name** Paula Maccabee

**Comment**      3. The SDEIS Must Evaluate Current Resource Conditions and Impacts of the Land Exchange on Public and Ecological Values, Evaluating a Wide Range of Ecological Values and Standards and Considering the Future Use of the Federal Land for the PolyMet Sulfide Mine, Future Exploitation of the Entire Federal Estate and Cumulative Impacts of other Mining Projects.

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## MRK      Market Value

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**Comment Number** LE 282-42

**Commenter Name** Paula Maccabee

**Comment** SUMMARY

The Federal Land Planning and Management Act (FLPMA) precludes a land exchange unless the public interest will be well served. Determining whether the resource values and public objectives served by the non-Federal lands equal or exceed those served by the Federal lands and the degree to which the intended use of the conveyed Federal land substantially conflicts with Forest Service management objectives requires a rigorous and complete environmental analysis. The SDEIS must replace inaccurate and incomplete Feasibility Analysis discussions with a thorough analysis of all adverse impacts of the proposed PolyMet project, including potential future impacts of usage of the entire 6,650 acre Federal estate and an analysis reflecting the cumulative impacts of existing and future mining projects and developments. If resource values, public objectives and environmental effects of the proposed use of the Federal lands are rigorously analyzed in the SDEIS, the PolyMet Land Exchange cannot meet the public interest test required by federal law.

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**Comment Number** LE 283-6

**Commenter Name** Margaret Watkins

**Comment** In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, much of the Hay Lake parcel (the biggest land tract) has been heavily logged, and contains one wild rice water body.

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**Comment Number** LE 283-10

**Commenter Name** Margaret Watkins

**Comment** Federal statutes and rules require that an exchange of Forest Service lands for non-federal lands must be of equal value. Federal rules, Uniform Appraisal Standards and case law provide that the value of land must include the fair market value considering the use to which the land would be put, including mineral exploitation. Therefore, the SEIS must evaluate the use of Federal lands for which the Poly Met Land Exchange is being considered in addition to other factors that were considered to determine fair market value.

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**Comment Number** LE 283-16

**Commenter Name** Margaret Watkins

**Comment** The fair market value including mineral exploitation must be determined and evaluated as part of the land exchange.

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**Comment Number** LE 302-10

**Commenter Name** Kevin Proescholdt

**Comment** 7. Unclear Value of Acquired Lands - Should the exchange occur, the public would gain approximately 6,722 acres of land. But these lands are scattered across the forest in five separate parcels. Some candidate parcels are as small as 32 acres in size. Unknown at this time are the quality of the wetlands present, the habitat value these lands represent, the cultural, recreational, wildlife values of these lands. The public would divest itself of a high-quality, intact, unfragmented piece of land, in exchange for five separate pieces. The Forest Service must explore how this proposed land exchange provides equal or greater values for Wildlife, recreation, cultural needs, and ecological integrity.

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## MRK      Market Value

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**Comment Number** LE 302-11

**Commenter Name** Kevin Proescholdt

**Comment** 8. Land Will Be Destroyed - If an exchange occurs, it would result in an approximate equal amount of land divested and acquired in public ownership. But the exchange results in a real and actual loss of quality habitat through the development of the mine. While total acreage of wetlands in public ownership stays the same, the reality is that over 1,000 acres of valuable peatlands are forever destroyed. The Forest Service must analyze the full impact of the loss of these lands and their ecological values to the citizen's of the state and nation.

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**Comment Number** LE 305-14

**Commenter Name** Maureen Johnson

**Comment** What is the value of land with mining minerals under it? Is the value of the land more than acre for acre elsewhere? What is the purchase history of other lands in the mining district? Compare with other heavy metals mining districts values. Real estate agents and the county records should be able to do this research. A private owner might want royalties: SNF should consider royalties.

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**Comment Number** LE 307-4

**Commenter Name** Loni Kemp

**Comment** The federal land that would be lost includes thousands of acres of high quality wetlands and habitat for endangered species including the Canada lynx and the gray wolf. The federal land drains into the Partridge River, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. up to 6,650 acres of the federal land could be exploited for mining.

In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, has few minerals and much of it has been heavily logged. For the taxpayer as well as for the environment, the PolyMet Land Exchange would not be a fair trade.

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**Comment Number** LE 315-4

**Commenter Name** Kevin Reuther

**Comment** The ultimate question to be decided is not whether PolyMet's project is or is not served by the proposed exchange, but whether "the public interest will be well served by making [the] exchange." 43 'U.S.C. § 1716(a). Moreover, the Secretary of Interior, prior to authorizing any exchange of federal lands, must find that "the values and the objectives which Federal lands or interests to be conveyed may serve if retained in Federal ownership are not more than the values of the non-Federal lands Or interests and the public objectives they could serve if acquired." Id.

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**Comment Number** LE 315-7

**Commenter Name** Kevin Reuther

**Comment** C. Offered Lands  
• Current ownership. The SEIS must provide specific information about the current ownership and use of the offered parcels.

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## MRK      Market Value

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**Comment Number** LE 330-3

**Commenter Name** Gerald Olsen

**Comment** My biggest concern is this, that the equal value is fair and reasonable. In the past this has not been true the private parties were cheated.

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**Comment Number** LE 340-1

**Commenter Name** John Reed

**Comment** I am opposed to this exchange unless PolyMet can compensate taxpayers with higher quality exchange-land and greater land-area to compensate for the harm which will be caused the the open pit mining.

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**Comment Number** LE 340-3

**Commenter Name** John Reed

**Comment** The SDEIS must value the federal land based on the market for minerals exploitation to avoid giving the PolyMet Company a windfall profit. The non-federal land proposed in the Land Exchange is unlikely to have anything approaching equal monetary value.

The SDEIS must consider PolyMet's actual proposed use of the federal land - open pit sulfide mining and potential exploitation of the entire site - in determining what the public would lose in the exchange.

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**Comment Number** LE 342-3

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment** In the issue of land trade, one must not only consider fragmentation and or location but the impacts on all lands in the trade both public and private. That is, without this trade No Mining takes place on any lands either public or private; so that any environmental impact statement must logically compare the impacts of mining versus the natural services generated from no mining.

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**Comment Number** LE 342-4

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment** An EIS, by themselves, can not be logically determinate of action or inaction; what is needed is a cost-benefit analysis in regards to those same impacts.

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**Comment Number** LE 342-5

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment** The problem is not determining the benefits of mining which are relatively easy to calculate as they are market commodities and have prices but the cost of loss of environmental services from the land impacted. This cost is dramatically more problematic to calculate as these costs are externalized both in time and space.

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**Comment Number** LE 343-2

**Commenter Name** Mary Black

**Comment** While this privately-held tract of land is currently non-taxable, it could potentially be put back on the tax rolls if its use by the college were to change or if it were sold to another private party in the future. Therefore, Cook County would prefer that the U.S. Forest Service not acquire this parcel.

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## MRK      Market Value

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**Comment Number** LE 356-9

**Commenter Name** Kristin Henry

**Comment** IV. The Forest Service Must Adequately Evaluate the Ecological Benefits that the Public May Lose Under the Proposed Land Exchange.

The SEIS should closely examine the ecological benefits that the federal government will be giving up and what ecological benefits it may gain if it moves forward with the land exchange. The federal government is likely to determine through this cost-benefit analysis that the public and federal government would lose much more than it would gain.

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**Comment Number** LE 356-10

**Commenter Name** Kristin Henry

**Comment** For instance, the Forest Service should not just compare the acreage of wetlands that it will exchange, it should also consider the ecological value of the wetlands. The Forest Service is proposing to exchange peat bogs. As noted below, peat bogs are rare wetlands that play a critical role in water filtration, flood control and carbon sequestration. The ecological value that these wetlands supply is significantly higher than other wetlands. The agency should do a thorough cost-benefit analysis so that it can adequately compare the true cost of giving up these wetlands for wetlands with lower wetland function value. In addition, the Forest Service should compare the impacts at a watershed level so the agency can compare the impacts to watershed dependent species.

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**Comment Number** LE 356-11

**Commenter Name** Kristin Henry

**Comment** The Forest Service is also proposing to exchange valuable wildlife habitat for numerous federal- and state-listed endangered species. For instance, the agency is proposing to exchange approximately 1,500 acres of Canada lynx habitat, including two valuable travel corridors. In exchange, the agency does not appear to gain valuable wildlife habitat. See Scoping Notice at 2-3 (only one of the five proposed parcels serves as habitat for one state threatened species). The agency should consider what will be the true cost in terms of lost ecological value if it proceeds with an exchange of ecologically valuable lands for lands with a reduced ecological value. This analysis should focus on how this exchange will impact recovery plans for these listed species, especially in light of climate change. (For example, do the impacted travel corridors represent a critical habitat link for the lynx in a warmer environment?)

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**Comment Number** LE 356-20

**Commenter Name** Kristin Henry

**Comment** IX. The SEIS Should Discuss how the Lands Were Selected and What is the Value of these Lands.

The Forest Service should explicitly describe how the both the federal and non-federal lands that are proposed for exchange were selected. For instance, the SEIS should discuss whether the federal government had input into what non-federal lands it would acquire. In addition, the SEIS should discuss how the agency assessed the value for the federal and no-federal lands. For instance, did the agency include the ecological, recreational, cultural, historical, and biodiversity value of these lands in its assessment.

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## MRK      Market Value

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**Comment Number** LE 371-2

**Commenter Name** Anne Stewart Uehling

**Comment** To be gained- Jobs for at least a few decades

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**Comment Number** LE 371-3

**Commenter Name** Anne Stewart Uehling

**Comment** Possible loss  
- Wildlife habitat  
- Renewable forest for logging  
- Useable waterways and lakes  
- habitat for human habitation and recreation

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**Comment Number** LE 381-4

**Commenter Name** Gary Clements

**Comment** Ultimately, in the interest of keeping this wonderful national treasure clean and in the trust that was intended when the Superior National Forest was formed, I ask that you not consider further this land exchange. It has temporary economic gain, mostly for the foreign corporations who are behind the effort as its prime value, at the long-term expense of the forest, and the people who enjoy it. That is not the value that should influence this decision.

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**Comment Number** LE 406-3

**Commenter Name** Cindy Cantrell

**Comment** After looking at the maps of the various tracts, it appears that PolyMet would receive a large area, approximately 4.7 miles by 2+ miles in exchange for scattered small tracts. I could not find the proposed land to be exchanged on the map for Tract 4.

Is there a financial or manpower expense or disadvantage to the Forest Service caused by the existence of these small holdings? It appears to me that the result of this land exchange would be more land impacted by mining activities and more possible degradation of water and air quality and loss of wildlife habitat.

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**Comment Number** LE 449-2

**Commenter Name** Carl Sack

**Comment** Though the large parcel that Polymet is seeking has little to no recreational access, contiguous high-quality wetlands are vital for wildlife and should be protected. Polymet's project, with its inevitable perpetual pollution problems, does not fit with the Forest Service's mission.

Polymet claims that the Forest Service will be getting more than it is giving up in terms of overall acreage and public access. However, most of the parcels sit in areas with a moderate to high likelihood of future mining interest, so there is nothing to stop Polymet's precedent from being applied to these very parcels in the future. Furthermore, counter to the company's claims, all parcels but one are small and rather inaccessible, and do not provide the level of benefit in terms of consolidating land ownership that is being touted.

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## MRK      Market Value

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**Comment Number** LE 452-4

**Commenter Name** Randy Neprash

**Comment** 1. I think the basis for valuation of the land is flawed and inadequate. Valuation should include current and future values to the public, at a minimum, value for recreation purposes; value for water, species and scenic resources; value for cultural and historical purposes; future value in terms of biodiversity, lessening of fragmentation and climate change. Valuation should also include the true economic value of the surface estate to PolyMet, including speculative profits from the mining operation(s).

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**Comment Number** LE 455-1

**Commenter Name** Kris Wegerson

**Comment** In the SDEIS, please consider that the current USDAForestServiceLand is of a higher quality than the non-federal lands proposed for the exchange. The non-federal lands do not compare to the quality of the impacted wetlands that are part of the 100 Mile Swamp. This land was recognized by the Minnesota DNR as: "these sites represent the highest quality remaining examples of characteristic ecosystems in each ecological Land Type Association on the SuperiorNational Forest." ("Evaluation of Selected Potential Candidate Research and Natural Areas". Dec., 1997) The non-federal lands are divided into 11 separate pieces, like small pieces of a large jig-saw puzzle, and are inferior to the 6550 contiguous acres of USDAForestServiceLand.

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**Comment Number** LE 456-3

**Commenter Name** Dennis Szymialis

**Comment** Granting PolyMet exclusive access does in no way improve public access especially when it will destroy the utility of thousands of effected acres of public and private land including waterfront land for other economic and recreational uses.

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## MRK      Market Value

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**Comment Number** LE 456-7

**Commenter Name** Dennis Szymialis

**Comment** Local governments complain that their tax base is eroded by the reservation from taxation of federal land. No effort has been made by them to ask their own state to put state severed mineral interest reservations back on the tax roles or to sell these reserved interests back to surface owners to provide for a balanced budget. Reserved mineral interests cloud titles and discourage economic development by discouraging other uses due to the uncertainty of condemnation. Businesses won't develop this property with large infrastructure investments when mining takes a priority. So it is with the Weeks Act and PolyMet. If mining takes a priority the remainder of the forest is devalued along with other forests. The devaluation of the forest devalues the forest as a base for multi-use and recreation. The economy of Northeastern Minnesota is in trouble because of failed tax policy which has caused a dependency in the form of an addiction to mining. It is not for anyone's benefit to continue to feed or enable this addiction for the sake of theoretically cheaper commodities. It is not in anyone's best interest to subsidize commodity prices at the expense of our national forest system and the recreation that they provide. Some of the recreation can be translated into direct economic benefit like tourism and some of it is an intangible benefit to our standard of living that belongs to the people of the U.S. and not a foreign owned corporation that seeks special favor. One might ask if the benefit being requested by PolyMet is one that is available to anyone who purchases mineral interests subject to the Weeks Act but the more appropriate question is if PolyMet is the first and only one to get this benefit. This is a policy of lack of notice to those not benefitting, fundamentally unfair and arbitrary and capricious.

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## MRK      Market Value

**Comment Number** LE 457-10

**Commenter Name** Jane Koschak

**Comment** The USFS Scoping Letter includes maps of federal and non-federal lands proposed for exchange. The Scoping Letter states, that

“The non-federal lands offered for consideration by Poly Met are located throughout the SNF and would compliment existing federal ownership by eliminating or reducing private holdings. The non-federal tracts consist of forest and wetland habitat as well as some lake frontage, and would potentially enhance public recreation opportunities.”

Specially, how would this statement apply to the HayLakeparcel of land in St. LouisCounty? This parcel’s northern border is .5 mile from private property and the entire western part of the property is owned by Inland Steel, the eastern part of this parcel is bordered by Leonard Land Company, (a land conduit for PolyMet), and the city of Biwabic is approximately one mile away from the southern border. This 4,650 acre tract of land is situated in the midst of private mining company lands and contains 2,827 acres of wetlands. It is understood that there is the need to exchange wetlands for wetlands. However, without this proposed land exchange, the existing wetlands on HayLaketract would remain wetlands into perpetuity. There is no benefit to the federal government or to the public to secure HayLake, as Leonard Land Company would never destroy wetlands to begin with. Therefore, how does acquiring this parcel of land, simply by stating that it would now be in the “federal estate” become a benefit to the public? It is surrounded by a mining company district and could not be accessed for “public recreation opportunities” nor would the acquisition of this parcel fit the need of “complimenting existing federal ownership by eliminating or reducing private holdings.” The exchange of this parcel would only create an isolated tract of federal land surrounded by private land. In effect, this exchange would be unconsolidating one area of the forest to satisfy the requirement of exchanging wetlands for wetlands. To allow a land exchange that does not compliment existing federal ownership by eliminating or reducing private holdings or one that does not enhance public recreation opportunities does NOT serve the Public Interest.

How does the USFS think that the HayLakeacquisition will serve the Public Interest?

**Comment Number** LE 457-12

**Commenter Name** Jane Koschak

**Comment** 4.How will the loss of open space be made up?

**Comment Number** LE 458-1

**Commenter Name** Kevin Viken

**Comment** The land offered to the US Forest Service in exchange for their land is not of sufficient in value. It is important that the land acquired by the US Forest Service is of equal or greater value to the land given up in both market value and in the ecological services it provides.

## MRK      Market Value

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**Comment Number** LE 458-2

**Commenter Name** Kevin Viken

**Comment**

1. Land given up by the US Forest Service is an unfragmented continuous tract which is becoming more rare all the time and is therefore more valuable than the fragments given to the US Forest Service.
2. The land given up by the US Forest Service is closer to population centers in the region and is therefore also more valuable than the land acquired.
3. The land acquired by the US Forest Service is also not as valuable because inholdings are not in danger of being developed and already function to meet most of the goals the land is set aside for.
4. The land acquired by the US Forest Service does not perform the valuable ecological services in the same watershed where the land is given up.

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**Comment Number** LE 462-4

**Commenter Name** Frank Ongaro

**Comment** The land exchange parcels amount to 7075 total acres. This is significantly greater than the 6621 acres owned by the USFS at the proposed mine site.

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**Comment Number** LE 465-1

**Commenter Name** Tod Rubin

**Comment** I support the general idea of exchanging lower-value land for higher-value land. As a taxpayer, a local part-time resident, and heavy user of local Superior National Forest lands, I want the USFS to obtain maximum, increased value in any such exchange.

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**Comment Number** LE 465-5

**Commenter Name** Tod Rubin

**Comment** 3. Superior National Forest plans to exchange 6650 acres for 6722 acres. It appears that the USFS simply exchanged land, on an acre-for-acre basis, without establishing the value of the lands to be ceded or the lands to be acquired. It is remarkable that the area of the ceded lands and the acquired lands are within 1.1% of each other. Explain the land valuation process.

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**Comment Number** LE 466-2

**Commenter Name** Dan Marich

**Comment** The large tract of land that PolyMet has purchased would be a hugely beneficial addition to the U.S. Forest Service, providing sensible and responsible access for the public, outdoorsmen, women and youth. In addition, more wetlands will be acquired along with lakes for ricing. All the while, this will provide the opportunity for good paying jobs and diversifying our economy. The parcels that PolyMet has purchased will not only help them secure ownership of the surface rights above their mineral leases, but also helps the U.S. Forest Service strategically provide recreational opportunities for the public, conserve open spaces and stimulate long range socioeconomic benefits for the future.

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## MRK      Market Value

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**Comment Number** LE 479-1

**Commenter Name** Eric Viken

**Comment**            The land offered to the US Forest Service in exchange for their land is not of sufficient in value. It is important that the land acquired by the US Forest Service be of at least equal if not greater value to the land given up in both market value and in the ecological services it provides.

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**Comment Number** LE 479-2

**Commenter Name** Eric Viken

**Comment**            1. Land given up by the US Forest Service is an unfragmented continuous tract which is becoming more rare all the time and is therefore more valuable than the fragments given to the US Forest Service in exchange.

2. The land given up by the US Forest Service is closer to population centers in the region and is therefore also more valuable than the land acquired.

3. The land acquired by the US Forest Service is also not as valuable because inholdings are not in danger of being developed and already function to meet most of the goals the land is set aside for.

4. The land acquired by the US Forest Service does not perform the valuable ecological services in the same watershed where the land is given up.

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**Comment Number** LE 482-4

**Commenter Name** LeRoger Lind

**Comment**            The public lands involved in this exchange serve as a buffer for adjoining public and private lands from currently permitted activities on private mining property. Exchanging the public Superior National Forest lands for private lands in areas having no directly ecological connection to them would be setting a dangerous precedent for NE Minnesota.

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**Comment Number** LE 482-6

**Commenter Name** LeRoger Lind

**Comment**            The procurement of the private and other parcels in question should be justified on their own merits whether it be creating efficiencies in forest management or taking advantage of attractive real estate acquisitions. The price of the 6700 acres of federal land would be prohibitive for mining companies if it were based upon its proposed extraction uses and the cost of preventing air and water pollution associated with non-ferrous mining and the ensuing perpetual water pollution from millions of tons of reactive waste rock material.

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**Comment Number** LE 484-1

**Commenter Name** Julie Viken

**Comment**            The land offered to the US Forest Service in exchange for their land is not of sufficient in value. It is important that the land acquired by the US Forest Service is of equal or greater value to the land given up in both market value and in the ecological services it provides.

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## MRK      Market Value

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**Comment Number** LE 484-2

**Commenter Name** Julie Viken

**Comment**

1. Land given up by the US Forest Service is an unfragmented continuous tract which is becoming more rare all the time and is therefore more valuable than the fragments given to the US Forest Service.
2. The land given up by the US Forest Service is closer to population centers in the region and is therefore also more valuable than the land acquired.
3. The land acquired by the US Forest Service is also not as valuable because in holdings are not in danger of being developed and already function to meet most of the goals the land is set aside for.
4. The land acquired by the US Forest Service does not perform the valuable ecological services in the same watershed where the land is given up.

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**Comment Number** LE 486-2

**Commenter Name** Peter Dziuk

**Comment**

The present federal lands proposed for exchange are contiguous by definition and in that capacity act as a unit providing ecological and environmental benefits to wildlife, the public and the planet. As it sits immediately adjacent to private tracts with an extensive history of environmental degradation, it serves as an important buffer to the on-going and persistent negative environmental impacts previous land use has created. Removal and conversion into expanded environmental degradation only moves the buffer further out and exponentially subjects additional environmental resources, both public and private, to harm.

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**Comment Number** LE 486-5

**Commenter Name** Peter Dziuk

**Comment**

By and large all of these pieces of private property are paradoxically irrelevant in their exchange while being intrinsically imperative to the long term FS mission. Whether their ownership has fallen inside or outside the public domain has little impact on their environmental function as it exists today. They are small and relatively underutilized and generally un-exploitable. The regional geography, topography, ecology and economy is necessarily the predominant management template under which they exist. Adding that they mostly lie isolated and scattered between predominantly state, county and federal ownership, present regional public management, pragmatically, is the de facto management strategy implemented. That most are essentially not managed at all, for these reasons any exchange becomes nearly mute in public value. "Enhancement" is theoretical only. The FS cannot demonstrate their incorporation improves their lot significantly. Even what private use or abuse might incur is marginal and obscene as compared to the already highly demonstrated and purposefully intended future corruption of present federal land.

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**MRK      Market Value**

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**Comment Number** LE 486-6

**Commenter Name** Peter Dziuk

**Comment** Of the five tracts, the fifth implies more merit than the rest in evoking its proximity to the BWCA. But here too, reality trumps theory. That it is near an important entry point is of no consequence for FS inclusion and cannot be demonstrated to be an area enhancement at all. McFarland lake is and will likely remain mostly outside of federal jurisdiction because it is deemed and desired of higher private value. As ownership and public accessibility presently stand, it has not even been demonstrated that enhancement is required let alone to be realized. If these parcels are of such great consequence and justifiable, another more appropriate and less destructive acquisition strategy can easily be implemented.

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**Comment Number** LE 486-8

**Commenter Name** Peter Dziuk

**Comment** While the FS would like to separate its self from the greater environmental issues contested in other public arenas, by only considering a narrow numerical management exchange value, in admitting it is a “connected action” it cannot do so. In just the land exchange alone this is a net loss of public forest resources at the greatest conceivable cost. But this great net loss is connected to even greater influences that bear heavily upon this decision.

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**Comment Number** LE 505-1

**Commenter Name** Daniel Westholm

**Comment** I am writing to comment on the proposed land swap involved with the development of the Polymet copper/nickel mine. The proposal as it currently stands, has several shortcomings. First the current federal land exists as one solid piece, an increasing rarity in the northern Minnesota, that will be exchanged for many small tracts of land scattered throughout the SNF. Second, the acquired land is not performing the same ecological functions as the current federal land. Third, the acquired land should be threatened with development to achieve less loss of wild space.

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**Comment Number** LE 555-1

**Commenter Name** Sara Barsel

**Comment** I do not believe that the lands set forth to be exchanged are a fair trade. I request that an EIS be completed in order to provide a detailed analysis of how the proposed tracts of land were assessed for

value. Land valuation should include value to the public; value for recreation purposes; value for water, species and scenic resources; value for cultural and historical purposes; and future value in terms of biodiversity, lessening of fragmentation and climate change. The true economic value of the surface estate to PolyMet, including gaining the ability to destroy the surface by strip mining, should be included in the valuation.

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**MRK      Market Value**

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**Comment Number** LE 566-6

**Commenter Name** Marc Fink

**Comment**      The Forest Service has issued regulations governing land exchanges. 36 C.F.R. Part 254. The Forest Service must explain and disclose in the Draft EIS how the proposed land exchange complies with each of these regulatory requirements, including but not limited to:

36 C.F.R. § 254.3(b), which states that a land exchange may be completed only after a determination that the public interest will be well served;

36 C.F.R. § 254.3(b)(2), which states that in order to determine that a proposed exchange well serves the public interest, the authorized officer must find that (i) the resource values and public objectives served by the non-Federal lands to be acquired must equal or exceed the resource values and public objectives served by the Federal lands to be conveyed; and (ii) the intended use of the conveyed Federal lands will not substantially conflict with established management objectives on adjacent Federal lands, including Indian Trust lands;

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**Comment Number** LE 566-7

**Commenter Name** Marc Fink

**Comment**      The Forest Service has issued regulations governing land exchanges. 36 C.F.R. Part 254. The Forest Service must explain and disclose in the Draft EIS how the proposed land exchange complies with each of these regulatory requirements, including but not limited to:

36 C.F.R. § 254.3(c), which states the lands to be exchanged must be of equal value, based on the market value as determined through appraisals;

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**Comment Number** LE 566-8

**Commenter Name** Marc Fink

**Comment**      The Forest Service has issued regulations governing land exchanges. 36 C.F.R. Part 254. The Forest Service must explain and disclose in the Draft EIS how the proposed land exchange complies with each of these regulatory requirements, including but not limited to:

36 C.F.R. § 254.11(a)(2), which states that the Forest Service may exchange lands which are of approximately equal value upon a determination that the value of the lands to be conveyed out of Federal ownership is not more than \$150,000 as based on a statement of value prepared by a qualified appraiser;

36 C.F.R. § 254.35(c), which states that the value of Federal lands conveyed in any transaction, pursuant to this subpart, shall not exceed \$150,000; and

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## MRK      Market Value

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**Comment Number** LE 566-9

**Commenter Name** Marc Fink

**Comment** The Forest Service has issued regulations governing land exchanges. 36 C.F.R. Part 254. The Forest Service must explain and disclose in the Draft EIS how the proposed land exchange complies with each of these regulatory requirements, including but not limited to:

36 C.F.R. § 254.36(c), which states criteria that must be considered by the Forest Service in determining whether the proposed exchange would serve the public interest, including that the scenic, wildlife, environmental, historic, archaeological, or cultural values will not be substantially affected or impaired.

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**Comment Number** LE 566-11

**Commenter Name** Marc Fink

**Comment** As stated, a proposed land exchange must be based on market value as determined through appraisals. 36 C.F.R. § 254.3(b)(2)(ii). These appraisals must be disclosed for the public to review during the NEPA process. As part of this disclosure, the Forest Service must fully explain how the value of the lands to be conveyed and acquired were determined, including the value of the surface estate to a mining company that is claiming millions of dollars in profits if it is allowed to surface mine this same site for copper and other heavy metals. See *Desert Citizens Against Pollution v. Bisson*, 231 F.3d 1172 (9th Cir. 2000). Other values must include the value to the public for recreational purposes, and for clean water, functioning wetlands, wildlife corridors, biodiversity and other natural resources.

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**Comment Number** LE 566-20

**Commenter Name** Marc Fink

**Comment** FLPMA forbids land exchanges unless the public interest would be well served by making the exchange. 43 U.S.C. § 1716(a). The value of the federal lands to be conveyed must not be more than the value of the non-federal lands to be acquired. 43 U.S.C. § 1716(b). The Center can see no possible way for the Forest Service to demonstrate that the proposed land exchange – which would likely lead to the implementation of the proposed NorthMet mine by a Canadian mining company, and thereby result in the largest ever destruction of wetlands in the region, an increase in already high mercury levels, the violation of water quality standards for hundreds to thousands of years, the irreversible degradation of Tribal lands, and destruction of over a thousand acres of formally designated critical habitat – is somehow in the public interest.

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**Comment Number** LE 566-21

**Commenter Name** Marc Fink

**Comment** The Forest Service must accurately calculate and disclose to the public the value of the lands to be conveyed, along with the minerals that could thereby be obtained by PolyMet through surface mining, if the land exchange is approved. See 43 U.S.C. § 1716(f); 43 C.F.R. § 2201.3-2(a) (the appraisal must determine the market value of the affected lands, as if in private ownership); *Desert Citizens v. Bisson*, 231 F.3d 1172 (9th Cir. 2000).

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## MRK      Market Value

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**Comment Number** LE 574-2

**Commenter Name** Avangelina Tamis McKnight

**Comment**      The present federal lands proposed for exchange are contiguous by definition and in that capacity act as a unit providing ecological and environmental benefits to wildlife, the public and the planet. As it sits immediately adjacent to private tracts with an extensive history of environmental degradation, it serves as an important buffer to the on-going and persistent negative environmental impacts previous land use has created. Removal and conversion into expanded environmental degradation only moves the buffer further out and exponentially subjects additional environmental resources, both public and private, to harm.

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**Comment Number** LE 574-5

**Commenter Name** Avangelina Tamis McKnight

**Comment**      By and large all of these pieces of private property are paradoxically irrelevant in their exchange while being intrinsically imperative to the long term FS mission. Whether their ownership has fallen inside or outside the public domain has little impact on their environmental function as it exists today. They are small and relatively underutilized and generally un-exploitable. The regional geography, topography, ecology and economy is necessarily the predominant management template under which they exist. Adding that they mostly lie isolated and scattered between predominantly state, county and federal ownership, present regional public management, pragmatically, is the de facto management strategy implemented. That most are essentially not managed at all, for these reasons any exchange becomes nearly mute in public value. "Enhancement" is theoretical only. The FS cannot demonstrate their incorporation improves their lot significantly. Even what private use or abuse might incur is marginal, and obscene as a comparison to the already highly demonstrated and purposefully intended future corruption of present federal land.

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**Comment Number** LE 574-6

**Commenter Name** Avangelina Tamis McKnight

**Comment**      Of the five tracts, the fifth implies more merit than the rest in evoking its proximity to the BWCA. But here too, reality trumps theory. That it is near an important entry point is of no consequence for FS inclusion and cannot be demonstrated to be an area enhancement at all. McFarland lake is and will likely remain mostly outside of federal jurisdiction because it is deemed and desired of higher private value. As ownership and public accessibility presently stand, it has not even been demonstrated that enhancement is required let alone to be realized. If these parcels are of such great consequence and justifiable, another more appropriate and less destructive acquisition strategy can easily be implemented.

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## MRK      Market Value

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**Comment Number** LE 574-8

**Commenter Name** Avangelina Tamis McKnight

**Comment** While the FS would like to separate its self from the greater environmental issues contested in other public arenas, by only considering a narrow numerical management exchange value, in admitting it is a "connected action" it cannot do so. In just the land exchange alone this is a net loss of public forest resources at the greatest conceivable cost. But this great net loss is connected to even greater influences that bear heavily upon this decision.

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**Comment Number** LE 581-5

**Commenter Name** Steve Koschak

**Comment** The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is NOT in the public interest. Instead it would result in enormous benefit to a private corporation with huge loss to the public and the environment of northeastern Minnesota.

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**Comment Number** LE 581-8

**Commenter Name** Steve Koschak

**Comment** 1. The USFS must value the federal land based on the market for minerals exploitation to avoid giving the PolyMet Company a windfall profit. The non-federal land proposed in the Land Exchange is unlikely to have anything approaching equal monetary value. When were these properties appraised? Were multiple appraisals done with other companies besides the USFS and PolyMet? What are their present values? Are they valid for 2010 and how many years will this value last? Will they be adjusted? When do the appraised values expire? Have they already expired? This is what occurred in the River Point exchange.

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**Comment Number** LE 581-9

**Commenter Name** Steve Koschak

**Comment** 2. The USFS must consider PolyMet's actual proposed use of the federal land - open pit sulfide mining and potential exploitation of the entire site - in determining what the public would lose in the exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources. (In the River Point exchange, a deed restriction was required for the tribal resource of the Laurel Indian archaeological find of 1982. Also required were covenant restrictions on the shoreline which were to be maintained by the USFS. The fluctuating water level of the reservoir on Birch Lake has led to total disrepair of the 200' of retaining wall on the south shoreline. Thus far, though many requests for USFS assistance have been made, no repair has occurred. How then will the USFS have the necessary resources to supervise and control the environment in and around this possible PolyMet land exchange site (Embarrass and St. Louis Rivers and the Lake Superior basin which will be the recipient of AMD from the nonferrous mining process) which is a mammoth project as compared to that of River Point?

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## MRK      Market Value

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**Comment Number** LE 585-8

**Commenter Name** Bradley Sagen

**Comment**            Market Valuation  
The Federal Land Planning and Management Act and implementing regulations make clear that National Forest lands be exchanged for lands of equal value (36 C.F.R. 254.12 (a) and (b). Federal regulations require that fair market value of the lands includes the use to which the lands would be put - including minerals 36 C.F.R. 254.9 (b)(i)(ii)(iv).

Conclusion. The fair market valuation of the federal lands proposed for exchange must include an analysis of their value for minerals extraction (of all types). Examples of the forest, wetlands, and other resources to be valued are described elsewhere in this document. Negative values of non-federal lands such as dump sites and clearcutting must also be considered.

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**Comment Number** LE 590-3

**Commenter Name** Richard Watson

**Comment**            Shouldn't any fair land exchange be for at least like value and if we are sharp maybe a slight advantage to the public?

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**Comment Number** LE 590-4

**Commenter Name** Richard Watson

**Comment**            How will the loss of wetlands, habitat, forest, recreational spaces, and the priceless 100 mile swamp benefit the public?

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**Comment Number** LE 590-5

**Commenter Name** Richard Watson

**Comment**            Why are we considering lands suggested by PolyMet for the exchange? And please explain, in detail, how the USFS sees the Hay Lake parcel as anything other than in the best interest of PolyMet?

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**Comment Number** LE 590-6

**Commenter Name** Richard Watson

**Comment**            How do you determine the value of 6650 or so acres much of which is quality carbon sequestering wetlands and wildlife habitat that has been protected and persevered since 1911 by law? Who will determine that value in dollars factoring in all the intangibles we all recognize are part of that land? How can you justify this exchange at all in light of The Weeks Act?

Once you have the value of that land on paper and can justify such, how will you find land of equal value to serve the public interest?

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**Comment Number** LE 590-7

**Commenter Name** Richard Watson

**Comment**            Once the exchange occurs how will you serve the public interest? The new owners may not be as concerned with the health of the populace or region as we are. What are you going to do to guarantee the protection of the original 6650 or so acres from pollution and environmental degradation?

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**MRK      Market Value**

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**Comment Number** LE 591-1

**Commenter Name** John Waterbury

**Comment** 1. The US Forest service gets 6,000 acres of forested land in exchange for land located in the middle of the iron range and surrounded by retired tackinite mines

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**Comment Number** LE 621-1

**Commenter Name** Marlene Pospeck

**Comment** The 7,000 -plus acres of land that Polymet has acquired would be a wonderful addition to U.S Forest holdings. Instead of logged-over, publically inaccessible land situated in the midst of a mining district, the USFS will acquire high-value natural resource land that is accessible to all who recreate in and enjoy the forest.

The lands that Polymet has acquired are located throughout Superior National Forest and, in many cases, allow the USFS to consolidate its holdings, making the parcel more valuable. Additional wetlands will be acquired as will two accessible wild rice lakes.

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**Comment Number** LE 627-41

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
As part of the exchange analysis, the Forest Service must evaluate the context of the nonfederal tracts within their landscapes. The public must be told that the exchange will result in an actual loss of contiguous habitat. An assessment of the impacts of these losses on species needs to be conducted. A thorough evaluation of the nonfederal candidate lands is needed to provide information about their ecosystem diversity. And the Forest Service needs to examine if this exchange helps achieve the Forest Plan Goal of providing for a variety of life by managing biologically diverse ecosystems.

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**Comment Number** LE 629-1

**Commenter Name** Christopher Krupp

**Comment** The Forest Service must calculate the value of all lands associated with this proposed action according to the Uniform Appraisal Standards for Federal Land Acquisition. The appraisal of the Superior National Forest lands must rely on a legal, feasible highest and best use of the parcels as though they were in private ownership. See *Desert Citizens v. Bisson*, 231 F.3d 1172 (9th Cir. 2000). Based on the information provided by the Forest Service the highest and best use is certainly to support NorthMet's surface mining. It is important that the Forest Service publish all appraisal information. While appraisals may not pertain directly to environmental analysis, disclosing detailed appraisal information in the Environmental Impact Statement greatly benefits the public in helping understand how all lands were valued. Such openness also benefits the Forest Service in its relationship with the interested public.

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**Comment Number** LE 682-5

**Commenter Name** Robin Vora

**Comment** Given the mineral value which may not be fully realized without surface rights, the lands traded to PolyMet are worth a lot more than the lands obtained by the public. It seems to me the Forest Service and the American public should be getting several tens of thousands acres of land in exchange for the 6,650 acres proposed for trade to PolyMet. I am concerned that the public is once again not getting a fair deal in these Forest Service land exchanges.

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**MRK      Market Value**

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**Comment Number** LE 704-4

**Commenter Name** John Roth

**Comment** Fourth, the non-federal land offered for the exchange must be sufficiently valued to off-set the value of the lost federal property. If the federal land has an appraised value of X dollars, the non-federal land must be worth at least that same amount.

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**Comment Number** LE 704-5

**Commenter Name** John Roth

**Comment** Fifth, the planned usage of the exchanged federal land cannot in any way cause harm to adjacent federal property or the forest as a whole. If the proposed future usage will increase air or water pollution or result in some other harm, the full cost of that potential harm must be determined and mitigated. Even if there is only a risk of harm, the cost of that risk must be calculated and compensated for, as well. For example, if the intended use of the federal land poses a 10% risk of increased water pollution and it would cost \$50 million in damages if the pollution occurred, the Forest Service should get non-federal land valued sufficiently to cover the value of that risk. Alternately, the private party should be required to obtain for the Forest Service a bond covering the projected costs for any necessary clean-up or mitigation.

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**Comment Number** LE 704-8

**Commenter Name** John Roth

**Comment** To cover the risk of increased pollution caused by PolyMet's mining proposal, PolyMet should be offering significantly more land to the Forest Service and/or agreeing to obtain a pollution mitigation bond to cover the cost of any resulting pollution.

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**Comment Number** LE 874-1

**Commenter Name** Diadra Decker

**Comment** Financially, it would create a huge windfall for a foreign company at the expense of the American people, which is legally prohibited. And sulfide mining activities likely would leave behind both, unacceptable long-term environmental impacts and financial liability. Neither, the ecological nor the market values of the federal and non-federal lands have been accurately assessed, and they must be characterized in detail. The potential adverse effects on groundwater quantity and quality of allowing open-pit mines in this location must be determined by empirical testing, not mere modeling.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 053-1

**Commenter Name** Jeff Kopp

**Comment** I am interested in further information on the land exchange with regard to Polymet Mining..

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**Comment Number** LE 053-6

**Commenter Name** Jeff Kopp

**Comment** 5) Is there additional information/agreements/documents available, other than the maps, for review prior to the support letter that I want to write? If so, here is my name and address: Jeff Kopp, PO Box 255, St Michael, MN 55376 or please reply to this e-mail.

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**Comment Number** LE 104-1

**Commenter Name** Jamie Kaiser

**Comment** I am a student at the UMN-Twin Cities and am studying the proposed mining operations in NE Minnesota. I was hoping you could clarify what exactly the land exchange with PolyMet entails and if there are more resources available regarding the project. Thank you for your time!

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**Comment Number** LE 227-13

**Commenter Name** Matthew Tyler

**Comment** All analyses must be based on thorough and credible field inventories using professional, statistically justifiable best practices. Inferences based in large part on office examination of aerial photographs or using vaguely specified models are neither scientifically credible nor sufficiently detailed to comply with the law and safeguard the public estate.

Analysis of the land exchange must not be developed “in the dark,” without reference to other analysis done on the impacts of PolyMet’s open pit mine proposal, such as the existing DEIS.

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**Comment Number** LE 227-17

**Commenter Name** Matthew Tyler

**Comment** These and other differences between the Feasibility Analysis and the DEIS suggest that the preparation of the Feasibility Analysis was sloppy and disingenuous. If the Supplemental EIS is to have legal or scientific credibility, it must not rely on the Feasibility Analysis, but instead be a rigorous, independent analysis that includes the full breadth of available information, including thorough searches of the scientific literature, and that fills data gaps by conducting relevant fieldwork using scientifically and statistically justifiable methodologies.

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**Comment Number** LE 227-24

**Commenter Name** Matthew Tyler

**Comment** While it may take considerable effort to conduct such an analysis, it is what the law requires. Large corporations should not receive special treatment. As a resident of Lake County, I’ve watched a proposed land exchange between Lake County and the Forest Service take 10 years to complete. It would be inconsistent with the intent of NEPA and damaging to the public trust for the Forest Service to conduct a land exchange with a private corporation in a more timely manner and without the same due diligence as a land exchange with a local unit of government. This is especially so given the difference between the potentially very damaging open pit mine proposed by PolyMet and the relatively benign land management activities proposed by Lake County.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 233-1

**Commenter Name** Frank Jeff Verito

**Comment** Indeed, there is no practical way to mail 3,000 comments. How can I view them online? Also, how long will I have to review the document and comment?

My comment for now is to deny the mine for the reasons of sedimentation, NNIP, obliteration of public property by road-building and mining operations, negative visual quality and the probable air and water pollution.

In the event I'm not given my due time to comment, I reserve the right to appeal based upon any of the above considerations, the details of which Superior National Forest management is well aware of, but shies away from for political reasons.

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**Comment Number** LE 233-2

**Commenter Name** Frank Jeff Verito

**Comment** Please send at least a summary document, maps and citizen comments in paper to:  
Frank Jeff Verito  
350-1/2 East Ridge Street  
Marquette, MI 49855 (continued below)

I don't have internet at home and my library time is too valuable to scrutinize your website. Please let me know if there are a vast number of citizen comments and I'll reconsider. It is also not necessary to send a lengthy EA of BA.

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**Comment Number** LE 233-3

**Commenter Name** Frank Jeff Verito

**Comment** Please send all information, including citizen comments, pertinent to the PolyMet mining proposal to the address below, with adequate time to comment. I learned of the proposal minutes ago, and as a NF owner demand my due time to comment on what appears to be an egregious proposal.

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**Comment Number** LE 273-3

**Commenter Name** Erik Erie

**Comment** I would expect that some concrete timelines would be established to get the permitting process completed.

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**Comment Number** LE 277-2

**Commenter Name** Nancy Schuldt

**Comment** We submit these comments now, but reserve the right to raise other issues for consideration at any time during the Supplemental Draft Environmental Impact Study (SDEIS) process, especially since we do not at this time have a full or clear understanding of the draft alternative for which new environmental data collection and impacts analysis will be presented.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 305-1

**Commenter Name** Maureen Johnson

**Comment** I am encouraged by US Forest Service Superior National Forest (SNF)'s increasing realization of the consequences of heavy metals mining in the SNF and proportionate increase in taking responsibility. As a joint-lead agency, the SNF has assumed responsibility for completing the required environmental analysis for the NorthMet project. Now that there are three joint-lead agencies, how will decisions be made?

I admire SNF's previous EIS work and respect for specific compliance with the EIS regulations. Will SNF take the same steps to evaluate all comments on the land exchange and other pieces of the Northmet DEIS in the same detailed manner?

Administrators will try to isolate an action to make it easier to deal with. It will be easier than facing the actual sum total of the problem and how it will affect other parts of the problem down the line. If such a decision is made, please pass my comments on to whatever other "isolated actions" they relate to. This approach is very difficult for the public to keep track of, and not in the spirit of the EIS regulations

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**Comment Number** LE 315-1

**Commenter Name** Kevin Reuther

**Comment** I. General comment  
The Forest Service has provided very little information to assist the public in providing scoping comments. It is impossible to establish a comprehensive list of issues that should be included in the SEIS related to the land exchange because, at present, only the location of the offered parcels has been provided. The lack of information hampers MCEA and other commenters' ability to evaluate what the scope of impacts from the proposed exchange could be. As information is developed and made available, commenters are likely to identify additional issues that should be evaluated in the SEIS. Given that the Forest Service has elected to ask for scoping comments after providing only skeletal information about the proposal, it will not be a sufficient response to later-raised substantive concerns that such issues are "outside the scope" of the SEIS.

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**Comment Number** LE 315-2

**Commenter Name** Kevin Reuther

**Comment** II. Issues to Include in SEIS

The following is a list of concerns or issues that MCEA believes should be evaluated, explained, or addressed in the SEIS. This list is not comprehensive and MCEA, by submitting these comments, does not waive its right to identify and raise additional issues or concerns at a later date.

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**Comment Number** LE 323-1

**Commenter Name** Paula Maccabee

**Comment** The undersigned organizations, WaterLegacy, Minnesota Center for Environmental Advocacy, League of Women Voters Minnesota, Friends of the Cloquet Valley State Forest, and Northeastern Minnesotans for Wilderness jointly request that the time allowed for public comment on the scoping materials for the Supplemental Draft Environmental Impact Statement ("SDEIS") for the proposed federal Land Exchange pertaining to the PolyMet NorthMet sulfide mine project be extended to at least 90 days after the release of the scoping materials.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 323-2

**Commenter Name** Paula Maccabee

**Comment** We also request that the full text of the Feasibility Analysis and any other specific information about the nature, history and character of the proposed federal and nonfederal land, as well as the scoping materials themselves, be made readily available to the public through the U.S. Forest Service (USFS) web site.

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**Comment Number** LE 323-3

**Commenter Name** Paula Maccabee

**Comment** Finally, we request that public meetings be conducted at convenient locations in Duluth and in St. Paul and permit the open exchange of ideas that Minnesota citizens customarily expect in various environmental review processes.

This request is made on behalf of members of our organizations and members of the public, pursuant to 40 C.F.R. § 1506.6(a), which requires that agencies “make diligent efforts to involve the public in preparing and implementing their NEPA [National Environmental Policy Act] procedures.”

As reflected in the Federal Register Notice dated October 13, 2010 (Vol. 75, pp. 62756-62758) the Superior National Forest (SNF) and United States Army Corps of Engineers (USACE) will use public scoping comments to “identify significant issues that will guide the analysis of impacts associated with the land exchange.” (p. 62757). Public comments are, thus, not peripheral, but integral to the SDEIS process. Adequate time for review and analysis of the proposed non-federal lands and other scoping materials is critical to effective environmental review as well a public involvement.

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**Comment Number** LE 323-9

**Commenter Name** Paula Maccabee

**Comment** In the interest of the public and to protect the natural resources that are of particular concern, the undersigned organizations request the following:

- That a 90-day public comment period be provided on the scoping of the Land Exchange SDEIS, counting from the time scoping materials are released;
- That an electronic copy of those scoping materials be directly provided to our organizations at the electronic addresses in the signature lines below as well as posted to the USFS web site;
- That the Feasibility Analysis and detailed information obtained by the Forest Service regarding the nature, history and character of the federal and non-federal lands be provided to the public, preferably on the USFS web site;
- That the SDEIS scoping comment process include a public meeting in Duluth and a public meeting in St. Paul, to ensure convenient public participation;
- That the public meeting be conducted in a format where members of the public can hear the perceptions of the cooperating agencies

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**Comment Number** LE 324-5

**Commenter Name** Daniel Mundt

**Comment** I would appreciate both a response and being kept advised as to what studies are being done and the affect of those studies on particularly ground water.

I reserve any decision as to support or opposition until I have received more information.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 346-1

**Commenter Name** Dave Schmidt

**Comment** I wish to remain on the mailing list for this project.  
Your electronic comment sheet is not working.  
The map showing nonfederal land for Tract 4 does not actually show the property in Sec 17

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**Comment Number** LE 353-1

**Commenter Name** Diadra Decker

**Comment** Whenever there is a scheduled opportunity for interaction of the public, please post it prominently on your website (not buried in some document with a link) and send notice via email.

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**Comment Number** LE 356-1

**Commenter Name** Kristin Henry

**Comment** I. The Forest Service Must Ensure that the Supplemental EIS Discusses the Impacts of the Entire Action and Not Just Impacts Associated with the Land Exchange

Under NEPA, an agency may not divide a project into multiple "actions," each of which individually has an insignificant environmental impact, but which collectively have a substantial impact. 42 U.S.C. § 4332; 40 C.F.R. § 1508.25. The Minnesota Department of Natural Resources ("DNR") and the United States Army Corps of Engineers ("Corps") attempted to illegally piecemeal the NorthMet Project at first by claiming that the land exchange was a separate action that the U.S. Forest Service would analyze under a different NEPA process. The Forest Service now concedes that the land exchange is a "connected action" and that it will examine the environmental impacts in a supplemental environmental impact statement ("SEIS")

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**Comment Number** LE 356-17

**Commenter Name** Kristin Henry

**Comment** DNR and the Corps' perfunctory analysis violated NEPA. See, e.g., Natural Res. Defense Council v. Kempthorne, 506 F. Supp. 2d 322,368-370 (E.D. Cal. 2007); Pacific Coast Fed'n of Fishermens' Ass'ns v. Gutierrez, 606 F. Supp. 2d 1122, 1183-1184 (E.D. Cal. 2008); South Yuba River Citizens League v. National Marine Fisheries Serv., 2010 WL 2720959 at \*22-23 (E.D. Cal. 2010).

The Forest Service must remedy this violation by actually assessing climate change impacts from the entire project. This should include an analysis of the expected impacts to wildlife. For instance, under the proposed land exchange, the public would divest itself of a large, contiguous piece of high quality habitat and acquire five separate, significantly smaller and possibly fragmented, parcels. It is well known that large contiguous blocks of land are more valuable to wildlife under climate change. The Forest Service must thus analyze the impacts to wildlife for losing this block of habitat in light of climate change.

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**Comment Number** LE 448-3

**Commenter Name** Dorie Reisenweber

**Comment** The USFS must hold on to the environmental review process and protect public lands.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 449-3

**Commenter Name** Carl Sack

**Comment** Furthermore, once again a public agency involved in the Polymet project has done a disservice to the public it is supposed to serve by not allowing a democratic comment process. With less than two weeks of notice, public open houses were held in Aurora and New Brighton--and hour and a half drive away from the major opulation center which could be most impacted, Duluth--at which information was given but there was no opportunity for the public to be heard or to hear each other.

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**Comment Number** LE 465-6

**Commenter Name** Tod Rubin

**Comment** 4. "The proposed land exchange is a "connected action" to the Northmet project" (Introduction, page1). There will likely be numerous, similar "connected actions" associated with the developments envisioned as part of Superior National Forest's Hardrock Mining Project. The Polymet land exchange cannot be taken in isolation when Superior National Forest is currently involved in the Hardrock Mining Project, with its numerous potentially similar mining developments. Explain the general procedure for "connected actions" and land exchanges, specifically related to other Superior National Forest activities, and specifically to the Hardrock Mining Project.

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**Comment Number** LE 496-1

**Commenter Name** Jeff Wiles

**Comment** Requesting you include these comments in your official record of citizen opposition to the proposed Polymet Land Exchange in northeastern Minnesota.

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**Comment Number** LE 566-12

**Commenter Name** Marc Fink

**Comment** The Forest Service must plainly disclose during the NEPA process any additional policies or internal procedures concerning land exchanges on National Forest System lands, including those specific to Weeks Act lands. This includes any policy regarding the acceptance of lands through a land exchange where the subsurface rights are not included. This also includes the need for Congressional oversight for land exchanges involving the Weeks Act that exceed \$25,000 in value.

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**Comment Number** LE 566-15

**Commenter Name** Marc Fink

**Comment** Moreover, the Forest Service must rationalize its purpose and need in light of the fact that the lands it would receive under the exchange would come with the very same "conflict" of a split estate between the Forest Service and the private mineral estate. Rather than protect the Superior National Forest for future generations, as the Weeks Act intended, it appears that the Forest Service is proposing to establish a perpetual shell game in which it will repeatedly exchange surface lands with mining companies in order to allow for the open pit mining of the mineral estate, until such time as the public forests, wetlands, and waters are destroyed.

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## NPR NEPA Process and Requirements

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**Comment Number** LE 585-1

**Commenter Name** Bradley Sagen

**Comment** We prefer paper documents. We regret the deadline forced us to use Email for submission of comments. We also request notification regarding any further opportunities for public comment, meetings or field trips concerning the Project.

### Scoping Document Fails to Identify Potential Issues and Alternatives

The NorthMet Mining Project and Land Exchange Scoping Document (referred to hereafter as NMLE) is both legally and technically inadequate and should be withdrawn immediately for necessary revisions. Regulations regarding environmental scoping documents (40 CFR 1501.7) make quite clear that scoping must determine the significant potential issues in the project. We would understand this to include also the identification of potential alternatives, including a "no action" alternative.

NMLE identifies no issues or alternatives. This is the proper role of the sponsoring agency, not the public. NMLE does acknowledge NMLE is a connected action to the NorthMet SDEIS but does not identify any issues arising from that connection.

Conclusion. NMLE should be withdrawn immediately for necessary revisions to include the identification of potential issues and of alternatives to the proposed action.

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**Comment Number** LE 602-6

**Commenter Name** Frank Jeff Verito

**Comment** Please in your next mailing, send all interested parties clear maps of the proposed acquired parcels' relations to surrounding property ownerships, and send copies of public comments unless the volume is obviously prohibitive. In the latter case, send instructions to access them electronically.

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**Comment Number** LE 629-2

**Commenter Name** Christopher Krupp

**Comment** Regulations implementing the National Environmental Policy Act require the Forest Service to explain the purpose and need for the proposed trade. 40 C.F.R. § 1502.13.  
In explaining the purpose and need, the Forest Service must do so in terms of its own interests, not those of NortMet. If the purpose and need include additional protections for land that the Forest Service would acquire, the Forest Service should identify whether the offered lands have previously suffered degradation in the absence of additional protections and the future likelihood of degradation if the proposed does not take place. Similarly, if the purpose and need include benefits to water quality or wildlife, the Forest Service must identify what harms to wildlife and water quality have occurred because the offered lands were in private hands.

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**Comment Number** LE 687-1

**Commenter Name** Marian Severt

**Comment** I realize jobs are important and mining is important but at what price. This exchange removes a requirement for environmental review. The public has an obligation through our government to control how PolyMet mines on public (USFS) lands. It is crucial we retain that right.

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## OOS Out of Scope

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**Comment Number** LE 006-2

**Commenter Name** Janet Asanchev

**Comment** Former Sen. Paul Simon from Illinois recently authored Tapped Out: "Within a few years, a water crisis of catastrophic proportions will explode upon us - unless aroused citizens ... demand of their leadership actions reflecting vision, understanding and courage."

As keepers of this finite public resource, you must do everything to advocate for its increased protection by conservation and reducing pollution and. No other resource can be substituted, and the time is fast approaching when every drop of it will be precious for the public - much more precious than the fist full of dollars to be had by PolyMet.

Unfortunately for this company, the time is past when we were unaware of the scope of cost and danger posed by their mining project.

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**Comment Number** LE 170-4

**Commenter Name** Elanne Palcich

**Comment** This land exchange process has its own labyrinth of betrayals to the public. This begins with the USFS being remiss in preparing a Hardrock Minerals Prospecting Permit Project EIS. The DEIS is just now being prepared. Then, even with this process finally in progress, the USFS has just ended comment periods for two additional prospecting applications (Encampment's Serpentine and Skibo deposits), considered individually in order to ignore cumulative effects, and considered as separate from the Hardrock DEIS which is supposed to be all inclusive of mining exploration impacts on Superior National Forest.

To further complicate matters, the USFS suspended preparation of the Hardrock DEIS by soliciting then U.S. Representative James Oberstar, along with U.S. Senator Amy Klobuchar and then U.S. Senator Norm Coleman, to introduce special legislation that would require the sale of 6,700 acres of USFS land to PolyMet (Superior National Forest Land Adjustment Act of 2007). Public pressure put an end to this endeavor.

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**Comment Number** LE 269-2

**Commenter Name** Don Emery

**Comment** Also, it is my understanding that PolyMet has little technical & management experience with a project of this type and size.

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**Comment Number** LE 273-2

**Commenter Name** Erik Erie

**Comment** I am amazed at the amount of time and money that has been spent to insure the projects success.

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**Comment Number** LE 305-7

**Commenter Name** Maureen Johnson

**Comment** Why is the sale of the Kawishiwi natural laboratory being handled separately? This area and the knowledge resulting from keeping it are irreplaceable. I live near one other in Minnesota, the Cedar Creek area.

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## OOS Out of Scope

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**Comment Number** LE 335-2

**Commenter Name** Jean Public

**Comment** usace cant be trusted to work for the good of the american people. usace works for business, only for business. this agency doesnt care what environmental havoc they create. have you ever heard of xanadu in nj - they allowed that horror to be built in a terribly overcrowded area and it is stil lnot occupied. it was not needed. usace is ugly agency. usace was the engineer for the dykes in new orleans that failed and killed people. dont think you are getting top quality work when you call in this agency. this part of the army should be disbanded. they are anti environmental in the worst sense. all they care about is business and money!

i oppose any discharge of fill into us waters. we already know usace will issue a permit for this. they work for destruction of earth.

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**Comment Number** LE 338-2

**Commenter Name** Charles F. Prokop

**Comment** I am vice president of the MN Trout Ass'n and have and still am on the Trout and Salmon subcommittee of the DNR budgetary oversight committee. I fish in a number of areas in Minnesota and am very deeply concerned about this proposal. It should not be permitted. Let me share some history on pollutions in Minnesota and in other states also.

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**Comment Number** LE 341-3

**Commenter Name** Jon Rich

**Comment** We need to increase funding tor DNR programs to help protect this pristine ecosystem. This will keep water quality high to sustain fish and wildlife and remain free of petroleum in the water because we enacted BWCA regulations with motor boats allowed on only a few large entry point lakes in 1978.

There has been lots on exploration on this land and with it the widened of forest trails which before you had to walk through now you can drive a car on these trails. Also, a barrage has been exploring the lakes which we don't need because Minnesotans don't want a mine on our BWCA. Leave the areas as is and so the people who canoe and camp can practice leaving no trace, leaving only footprints. Take only pictures and memories from this one of a kind place in the world, our BWCA.

As a long time youth and adult Boy Scouter, we have taught our scouts the conservation pledge: I give my pledge as an American to save and faithfully to defend from waste the natural resources of my country—its air, soil, and minerals, its forests, waters and wildlife.

Henry Thoreau's essay WALKING states that it in the wildness is the preservation of the world.

We have lost wisdom. We do not ask how decisions will affect the futures generations to come, our great grand children but it's always about how they affect the bottom line.

We are told that it could never happen. The largest oil spill in the history, and as of yet not the oil corporation, the state or the federal government and all its agencies don't have a handle on the situation but we are told it will never happen again. We must preserve the BWCA for our future generations. We cannot afford to take a chance that no environmental damage will occur.

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## OOS Out of Scope

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**Comment Number** LE 341-5

**Commenter Name** Jon Rich

**Comment** Finally, we must not eliminate the historic Kawishiwi Research Station and K Lab near Ely and the BWACAW. The demolition of these areas of Superior National Forest Cultural and scientific landmarks would pave the way for Sulfate mining.

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**Comment Number** LE 405-4

**Commenter Name** Steven D. Lere

**Comment** I hear and read about how the scrubbing technology is better now, which is probably true. My concern is that when times get tough and profits are lean in the mining industry pollution control is the last thing to be kept up and repaired. Now nothing is going to be destroyed in the first few years when everything is new, and probably during the next decade everything will be fine. Then parts for a scrubber will need repair and there will be no parts available. Do you really expect the plant to shut down or stop production on that line and wait for the parts to come in and make the repair? No, Production is number one. Or, the scrubber is falling short of its designed specs do you really think the line will be shut down or wait until the next scheduled repair to fix it if then? No, Production is number one. Worst, is the fact that there are times when it's cheaper for the company to pay a fine than make the necessary repairs. That is how the small waste lands and polluted water sheds will appear and as the years go by the wastelands will get larger and larger and the next thing we ask is how did this happen when miles and miles are polluted and a barren wasteland has been developed.

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**Comment Number** LE 604-1

**Commenter Name** Warner Wirta

**Comment** Is it a conflict of interest (illegal) to let PoliMet applying for a loan from IRRRB (State Money) to pay for surface land from the Superior National Forest to gain surface rights for mining rights?

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## OOS Out of Scope

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**Comment Number** LE 609-1

**Commenter Name** Joshua Tropp

**Comment** I oppose the current plan to allow Encampment Minerals to do exploratory drilling, road building, and ground geophysical surveys in the middle of a large wetland less than one mile southwest of Breda Lake, a popular wild rice lake. The fact that these activities would take place within a wetland, would be close to a popular wild rice lake, and would include a major stream crossing, clearly constitute extraordinary circumstances that require an Environmental Assessment to evaluate potential environmental impacts and ensure that they are avoided or mitigated.

Building a road into a wetland and crossing a stream without a proper bridge could result in major changes to the hydrology of both the wetland and Breda Lake. Prospecting activities with large, heavy vehicles during wet spring, summer, or fall conditions would be particularly harmful.

Waste water and rock debris from the boring could significantly alter the wetland and stream water chemistry, particularly because the Duluth Complex rock contains toxic sulfides and heavy metals that leach into the environment when exposed to air and water.

Finally, the total length of temporary road construction would exceed 1 mile because the 0.59 miles of so-called "existing road" on National Forest land is in fact an illegal ATV trail, not an existing road. Including the illegal ATV trail, the total length of new temporary road is 1.45 miles, which exceeds the length exempted from environmental review by Forest Service regulations.

In summary, due to extraordinary road building, wetland, stream, lake and water quality concerns, the Encampment Minerals exploration project near Breda Lake requires the more detailed, site specific scrutiny of an Environmental Assessment.

I believe that, if done fairly and correctly, the assessment would show that this project in its current form would have significant adverse impacts to wetland and water resources.

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## OOS Out of Scope

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**Comment Number** LE 616-1

**Commenter Name** Christine Frank

**Comment** I oppose the current plan to allow Encampment Minerals to do exploratory drilling, road building, and ground geophysical surveys in the middle of a large wetland less than one mile southwest of Breda Lake, a popular wild rice lake. The fact that these activities would take place within a wetland, would be close to a popular wild rice lake, and would include a major stream crossing, clearly constitute extraordinary circumstances that require an Environmental Assessment to evaluate potential environmental impacts and ensure that they are avoided or mitigated.

Building a road into a wetland and crossing a stream without a proper bridge could result in major changes to the hydrology of both the wetland and Breda Lake. Prospecting activities with large, heavy vehicles during wet spring, summer, or fall conditions would be particularly harmful.

Waste water and rock debris from the boring could significantly alter the wetland and stream water chemistry, particularly because the Duluth Complex rock contains toxic sulfides and heavy metals that leach into the environment when exposed to air and water.

Finally, the total length of temporary road construction would exceed 1 mile because the 0.59 miles of so-called "existing road" on National Forest land is in fact an illegal ATV trail, not an existing road. Including the illegal ATV trail, the total length of new temporary road is 1.45 miles, which exceeds the length exempted from environmental review by Forest Service regulations.

In summary, due to extraordinary road building, wetland, stream, lake and water quality concerns, the Encampment Minerals exploration project near Breda Lake requires the more detailed, site specific scrutiny of an Environmental Assessment.

I believe that, if done fairly and correctly, the assessment would show that this project in its current form would have significant adverse impacts to wetland and water resources.

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## PAC      Public Access Concerns

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**Comment Number** LE 253-2

**Commenter Name** Aaron Anderson

**Comment** lands are inaccessible to the public

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**Comment Number** LE 256-2

**Commenter Name** Bill Brice

**Comment** The lands they are giving up are isolated and generally unavailable for many public uses (Mining N, restricted non-public road S). The lands they are receiving some have good access, wild rice, and fit in with many of the FS goals for the Superior National Forest.

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**Comment Number** LE 324-2

**Commenter Name** Daniel Mundt

**Comment** the availability of the use of land for the public, but more importantly the entire water supply situation.

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**Comment Number** LE 400-2

**Commenter Name** Douglass A. Buell

**Comment** Even though this is within the Superior National Forest boundary, there is very little if any public access to this property and therefore of little practical use by anyone. In addition this land is within an established heavy mining area that has been operational for over 50 years. The proposed lands will greatly increase the land actually useable by the citizens of the area and the users of the Superior National Forest itself. Accessable wetlands, hunting areas and recreation areas will be increased as a result of the trade.

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**Comment Number** LE 449-2

**Commenter Name** Carl Sack

**Comment** Though the large parcel that Polymet is seeking has little to no recreational access, contiguous high-quality wetlands are vital for wildlife and should be protected. Polymet's project, with its inevitable perpetual pollution problems, does not fit with the Forest Service's mission.

Polymet claims that the Forest Service will be getting more than it is giving up in terms of overall acreage and public access. However, most of the parcels sit in areas with a moderate to high likelihood of future mining interest, so there is nothing to stop Polymet's precedent from being applied to these very parcels in the future. Furthermore, counter to the company's claims, all parcels but one are small and rather inaccessible, and do not provide the level of benefit in terms of consolidating land ownership that is being touted.

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**Comment Number** LE 462-3

**Commenter Name** Frank Ongaro

**Comment** Lands surrounding the Federal land have been extensively impacted by mining activity. Access to the property is limited by private road, rail lines, and mine pits to the north and west. The parcels proposed in the land exchange will improve public use and access.

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## PAC      Public Access Concerns

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**Comment Number** LE 466-2

**Commenter Name** Dan Marich

**Comment**      The large tract of land that PolyMet has purchased would be a hugely beneficial addition to the U.S. Forest Service, providing sensible and responsible access for the public, outdoorsmen, women and youth. In addition, more wetlands will be acquired along with lakes for ricing. All the while, this will provide the opportunity for good paying jobs and diversifying our economy. The parcels that PolyMet has purchased will not only help them secure ownership of the surface rights above their mineral leases, but also helps the U.S. Forest Service strategically provide recreational opportunities for the public, conserve open spaces and stimulate long range socioeconomic benefits for the future.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 063-1

**Commenter Name** Kristin Larsen

**Comment** It was in great part the intent of the Weeks Act to protect the headwaters of our nation – the land proposed for exchange- 6,650 acres of mostly undisturbed Federal wetlands and forests - is protected in its deed by the Weeks Act. These lands and waters so protected are to be held forever – not just until a mining company decides they want to dig a strip mine – an activity clearly not permitted by the Act that protects the land. This sale would also violate the forest plan. You have to take into account what is planned for this land – an enormous sulfide open pit strip mine. A mine that will cause there to be required water treatment for an unknown amount of time – perhaps forever. Not only has this mine been proposed but Duluth Metals has touted their plans for another mine nearby on their website.

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**Comment Number** LE 170-1

**Commenter Name** Elanne Palcich

**Comment** The USFS has made a grave error. According to the Weeks Act, this surface land should not be sold, outright or via a land exchange, to a foreign mining company. Instead that company must confine its mining to underground operations.

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**Comment Number** LE 227-1

**Commenter Name** Matthew Tyler

**Comment** I have reviewed the PolyMet Land Exchange Proposal Feasibility Analysis and the Forest Service's NorthMet Land Exchange Scoping Information, and have concluded that the Feasibility Study is inadequate and that key objectives of the Forest Plan are not likely to be met with this exchange. I have identified many general areas where the analysis of the Land Exchange in the Supplemental DEIS must be greatly improved in order to meet the standards of scientific credibility and applicable Federal Law (e.g. Weeks Act, NEPA, and National Forest Management Act). I then discuss some of the specific problems I have identified in the Feasibility Analysis regarding wetlands and waters. Finally, I describe in depth the scientific and legal necessity of assessing the relative impacts of the wetlands on Federal and Private lands upon water quality, quantity, and flood control in the Lake Superior and Rainy River Basins.

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**Comment Number** LE 227-2

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis and comparison of the degree to which the Federal and Private lands fulfill objectives set forth in the Superior National Forest's 2004 Forest Plan.

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**Comment Number** LE 228-1

**Commenter Name** Andrew and Elizabeth Urban

**Comment** Both my wife and I feel there is a larger issue here--it is one of public trust. When the U.S. government received these lands there was a provision that no open pit mining could be done. To now exchange other lands for these is a breach of good faith. If these lands did not come with the stipulation of no open pit mining, then the paramount questions would be ecological. But as the no strip mining stipulation is attached to these lands, the real question is the integrity of the Forest Service as an agency of the U.S. government.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 256-3

**Commenter Name** Bill Brice

**Comment** and fit in with many of the FS goals for the Superior National Forest.

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**Comment Number** LE 266-3

**Commenter Name** Janet Draper

**Comment** The Weeks Act which authorized the purchase of these lands wisely recognized the need to protect them forever. Removing that protection to allow for strip mining - for short-term economic gain - would be to violate a public trust.

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**Comment Number** LE 277-6

**Commenter Name** Nancy Schuldt

**Comment** Federal rules also state, "The Secretary is not required to exchange any Federal lands. Land exchanges are discretionary, voluntary real estate transactions between the Federal and nonFederal parties" (36 C.F.R. 254.3(a)). Further, any proposed federal land exchange that is not consistent with forest resource management plans must be rejected under 36 C.F.R. 254.3 (1) which states, "The authorized officer shall consider only those exchange proposals that are consistent with land and resource management plans." Finally, an exchange of federal land may only be completed after a determination is made "that the public interest will be well served" (36 C.F.R. 254.3(b)). The public interest determination must include a specific finding that "The intended use of the conveyed Federal land will not substantially conflict with established management objectives on adjacent Federal lands, including Indian Trust lands" (36 C.F.R. 254.3(b)(2)(ii)).

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**Comment Number** LE 282-3

**Commenter Name** Paula Maccabee

**Comment** The PolyMet Land Exchange would also conflict with the Resource Management Plan for the Superior National Forest (Forest Plan). The PolyMet Land Exchange does not qualify as a "land adjustment" under the Forest Plan, would fail to protect the Federal surface and would violate many of the Plan's provisions with respect to watersheds, vegetation and endangered species.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 282-15

**Commenter Name** Paula Maccabee

**Comment** 2. The SDEIS Must Provide a Detailed Analysis of the PolyMet Land Exchange and the Superior National Forest Resource Management Plan -- Correctly Applying Forest Plan Standards and Reflecting Conflicts between the Proposed Use of the Federal Land and Desired Conditions, Objectives and Standards Pertaining to Watersheds, Vegetation and Wildlife.

### SUMMARY

Land exchanges are discretionary and may not be approved if the intended use of the conveyed federal land will substantially conflict with established management objectives on adjacent federal lands, including Indian trust lands. The Feasibility Analysis is incomplete and, in places, inaccurate, in its identification of salient provisions of the Superior National Forest Resource Management Plan (Forest Plan) and its analysis of the impacts of the PolyMet Land Exchange and resulting mining activities on national forest and Tribal trust lands. The PolyMet Land Exchange conflicts with standards in the Forest Plan protecting the Federal surface and discouraging acquisition of divided estates as well as with desired conditions, objectives, standards and policies in the Forest Plan. The SDEIS must provide a candid and comprehensive analysis of conflicts between the existing Forest Plan and the PolyMet Land Exchange. The SDEIS should recognize that any revision of the Forest Plan could not be considered without coordination with Tribal resource management plans.

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**Comment Number** LE 282-16

**Commenter Name** Paula Maccabee

**Comment** DISCUSSION

The fact that an exchange of Superior National Forest land for non-Federal land would be beneficial for the PolyMet mining company does not require the Forest Service to provide the company with that benefit. Federal rules state, "The Secretary is not required to exchange any Federal lands. Land exchanges are discretionary, voluntary real estate transactions between the Federal and non-Federal parties." 36 C.F.R. 254.3(a).

A federal land exchange that is inconsistent with forest resource management plant must be rejected under 36 C.F.R. 254.3 (f) which states, "The authorized officer shall consider only those exchange proposals that are consistent with land and resource management plans."

In addition, an exchange of federal land may only be completed after a determination is made "that the public interest will be well served." 36 C.F.R. 254.3(b). Among other findings, the public interest determination must include a specific finding that "The intended use of the conveyed Federal land will not substantially conflict with established management objectives on adjacent Federal lands, including Indian Trust lands." 36 C.F.R. 254.3(b)(2)(ii).

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**Comment Number** LE 282-19

**Commenter Name** Paula Maccabee

**Comment** Conveyance for PolyMet's open pit mining of Federal land also conflicts with the Forest Plan language stating, "The use of National Forest System land for exploration and development of nonfederal mineral rights will be governed by the reserved or outstanding rights indicated in the chain of title." (Forest Plan, S-MN-10, p. 2-10) In its current public ownership, the chain of title on the Federal lands grants no rights to destroy the Federal surface. The Forest Plan also provides, "The protection of federal surface will be accomplished through negotiating with the mineral owner or operator and implementing applicable State and federal Laws." (Forest Plan, S-MN-12 p. 2-10) The PolyMet Land Exchange would excavate, rather than protect the Federal surface.

## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 282-20

**Commenter Name** Paula Maccabee

**Comment** □ Explicitly recognize that the proposed land exchange is prompted by the PolyMet Company's desire to destroy the surface of lands in the Federal estate, which surface would be protected under deed conditions but for the land exchange. The SDEIS must address the inconsistency between this purpose and Forest Plan provisions regarding protection of the Federal surface.

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**Comment Number** LE 282-22

**Commenter Name** Paula Maccabee

**Comment** The Feasibility Analysis is incomplete, if not disingenuous, in its statements suggesting that the PolyMet Land Exchange and the resulting PolyMet open pit mine would comply with the Forest Plan and the FLPMA. The SDEIS must candidly analyze Forest Plan provisions in light of the PolyMet Land Exchange and proposed mining use, rather than distorting its language to conceal inconsistencies.

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**Comment Number** LE 282-25

**Commenter Name** Paula Maccabee

**Comment** The Feasibility Analysis erroneously refers to the conveyance of 6,650 acres of mostly undisturbed Federal wetlands and forests as a "land ownership adjustment." (Feasibility Analysis, Summary Section 1, p. 2). But the term "land adjustment" refers to priorities for land sought to be acquired by the Forest Service for resource protection.<sup>12</sup> The Federal land proposed to be removed from public ownership and excavated in the PolyMet Land Exchange is, in fact, the type of land that is a first priority for acquisition under the Forest Plan. The Federal land is needed as habitat for federally listed, endangered and threatened species (Forest Plan G-LA-2, Priority 1(a), p. 2-51). The Federal land also includes wetlands needed to protect designated and unique resources, including the Lake Superior Basin, designated by Congress in the Great Lakes Initiative legislation. (Forest Plan G-LA-2, Priority 1(c), p. 2-52). The PolyMet Land Exchange would turn these priorities upside-down.

Similarly, the assertion that the huge tract of Federal land proposed for the PolyMet Land Exchange is a "land adjustment" making Federal lands "potentially available for conveyance." (Feasibility Analysis, Section 1, p. 3) misapplies the Forest Plan. The Forest Plan's statement that "land adjustment" may "reduce the need for landline maintenance and corner monumentation" implies that this type of conveyance pertains to small acreage adjustments, not to removing public ownership of a contiguous tract of over six thousand acres of land. (Forest Plan G-LA-3, p. 2-52).

In attempting to find a fit between the Forest Plan and the PolyMet Land Exchange, the Feasibility Analysis then asserts that the PolyMet Land Exchange is consistent with the goal that the Forest "provides commodity resources in an environmentally sustainable and acceptable manner to contribute to the social and economic sustainability and diversity of local communities." (Feasibility Analysis, Section 1, p. 3 citing Forest Plan, D-SE-1, p. 2-37, emphasis added). Characterizing a plan for open pit sulfide mining, destruction of undisturbed wetlands and forests and impairment of water quality for thousands of years, if not in perpetuity,<sup>13</sup> as "environmentally sustainable" is arbitrary and capricious.

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**Comment Number** LE 282-28

**Commenter Name** Paula Maccabee

**Comment** □ Identify any basis in law or fact for the Feasibility Analysis characterization that the future use of the Federal estate by PolyMet for open pit sulfide mining represents "an environmentally sustainable" use of forest resources.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 282-29

**Commenter Name** Paula Maccabee

**Comment** ☐ Identify any basis in law, fact or practice for the characterization in the Feasibility Analysis that release of 6,650 acres of contiguous Forest Service land for the purpose of private mineral exploitation is a “land adjustment” under the Forest Plan. Include discussion of the consistency of relinquishing ownership of the Federal land with priorities for acquisition of land in the Forest Plan.

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**Comment Number** LE 282-32

**Commenter Name** Paula Maccabee

**Comment** WATERSHEDS

- ☐ Desired condition: “Management activities do not reduce existing quality of surface or groundwater or impair designated uses of surface and ground water.” (Forest Plan DWS-4, p. 2-10)
  - ☐ Desired condition: “Water quality, altered stream flow, and channel stability do not limit aquatic biota or associated recreational uses. Water in lakes, streams, and wetlands meets or exceeds State water quality requirements.” (Forest Plan, D-WS-5 p.2-10)
  - ☐ Objective: “Improve and protect watershed conditions to provide the water quality, water quantity, and soil productivity necessary to support ecological functions and intended beneficial water uses.” (Forest Plan, O-WS-1, p. 2-12)
  - ☐ Guideline: “Wetland impacts will be avoided whenever possible. Where impacts are unavoidable, minimize and compensate for loss when undertaking projects.” (Forest Plan, G-WS-13, p. 2-15)
  - ☐ Guideline: “Wetlands will be managed to prevent the reduction of their water quality, fish and wildlife habitat, and aesthetic values. Management actions will not reduce water quality within a wetland, or upstream or downstream of a wetland, unless restoration of natural conditions is the primary goal of the activity.” (Forest Plan, GWS-15, p. 2-15)
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**Comment Number** LE 282-33

**Commenter Name** Paula Maccabee

**Comment** VEGETATION

- ☐ Objective: “Maintain acres of non-forested wetlands.” (Forest Plan, O-VG-4, p. 2-23)
  - ☐ Objective: “Increase acres of young lowland black spruce and tamarack forest communities. Increase acres of old-growth lowland black spruce and tamarack forest communities.” (Forest Plan, O-VG-16, p. 2-24)
  - ☐ Objective: “In mature or older upland forest types managed to maintain large patches (>300 acres of all types) manage patches to maintain the characteristics of mature or older native upland forest vegetation communities and promote the maintenance or development of interior forest habitat conditions.” (Forest Plan, O-VG-17, p. 2-24)
  - ☐ Objectives: “In Spatial Zones 1 and 2 maintain or increase amount of interior forest habitat. Provide interior habitat in a variety of upland and lowland vegetation communities.” (Forest Plan, O-VG-22, p. 2-26) “In Spatial Zone 3 strive to minimize the decrease in interior forest habitat in a variety of upland and lowland vegetation communities (Forest Plan, O-VG-25, p. 2-27)
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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 282-34

**Commenter Name** Paula Maccabee

**Comment**

WILDLIFE/ENDANGERED SPECIES

□ Record of Decision: “The Revised Plan affords special attention to the conservation of bald eagle, gray wolf, and Canada lynx and the habitats upon which they depend. . . incorporation of conservation measures into the Revised Plan, helped lead to the Fish and Wildlife Service’s concurrence that implementation of the Revised Plan would not adversely affect the bald eagle or critical habitat for gray wolf. It also helped lead to a Fish and Wildlife Service Biological Opinion that issued the finding that implementation would not jeopardize the continued existence of the gray wolf and Canada lynx on the Superior National Forest.”<sup>15</sup>

□ Desired Condition: “Contribute to the conservation and recovery of federally-listed, proposed, or candidate threatened and endangered species and the habitats upon which these species depend.” (Forest Plan, D-WL-3(c), p. 2-27)

□ Desired Condition: “Provide structure, composition, connectivity, function, and spatial patterns of aquatic and terrestrial habitats that maintain or restore opportunities for species to interact, disperse, and migrate and to reduce negative impacts associated with forest habitat fragmentation.” (Forest Plan, D-WL-3(h), p. 2-28)

□ Objective: “Maintain, protect, or improve habitat for all threatened and endangered species by emphasizing and working toward the goals and objectives of federal recovery plans and management direction in the Forest Plan. (Forest Plan, O-WL-4, p. 2-29)

□ Objective: “Promote the conservation and recovery of Canada lynx and its habitat.” (Forest Plan, O-WL-8, p. 2-29)

□ Objective: “Maintain and, where necessary and feasible, restore sufficient habitat connectivity to reduce mortality related to roads and to allow lynx to disperse within and between LAUs [lynx analysis units] and between LAUs and Boundary Waters Canoe Area Refugium on NFS land.” (Forest Plan, O-WL-11, p. 2-29)

□ Guideline: “Within LAUs on NFS land, moderate the timing, intensity, and extent of management activities, if necessary, to maintain required habitat components in lynx habitat, to reduce human influences on mortality risk and inter-specific competition, and to be responsive to current social and ecological constraints relevant to lynx habitat.” (Forest Plan, G-WL-1, p. 2-30)

□ Guideline: “Limit disturbance within each LAU on NFS land as follows: if more than 30% of the total lynx habitat (all ownerships) within an LAU is currently in unsuitable condition, no further reduction of suitable conditions should occur as a result of vegetation management activities by the National Forest. (Forest Plan, G-WL-3, p. 2-30)

□ Standard: “Management activities on NFS land shall not change more than 15% of lynx habitat on NFS land within an LAU to an unsuitable condition within a 10-year period.” (Forest Plan, S-WL-1, p. 2-30)

□ Objective: “Maintain, protect, or improve habitat for all sensitive species.” (Forest Plan, O-WL-18, p. 2-31)

□ Guideline: “Avoid or minimize negative impacts to known occurrences of sensitive species. (Forest Plan, G-WL-11, p. 2-31)

□ Guideline: “Within northern goshawk post-fledging areas, minimize activities, to the extent practical, that may disturb nesting pairs during critical nesting season (March 1– August 30) and, to the extent practical, within a 500 acre area encompassing all known nest areas within the territory: Maintain suitable habitat conditions on a minimum of 60% of the upland forested acres in post-fledging areas. Suitable habitat: jack pine and spruce/fir forest types >25 years and all other forest types >50 years with semi-closed to closed canopy (>70%).” (Forest Plan, G-WL-22, p. 2-35).

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 282-35

**Commenter Name** Paula Maccabee

**Comment** Once the provisions of the Forest Plan are evaluated more comprehensively and with a candid recognition of the proposed use of the Federal lands and their ecological value, it is unlikely that the Superior National Forest Resource Management Plan could authorize the proposed land exchange without substantial revision.

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**Comment Number** LE 282-36

**Commenter Name** Paula Maccabee

**Comment** The FLPMA permits revision of land use plans in the National Forest System, but requires in that process that the Secretary of Agriculture “coordinate land use plans for lands in the National Forest System with the land use planning and management programs of and for Indian Tribes by, among other things, considering the policies of approved Tribal land resource management programs.” 43 U.S.C. §1712(b). The Feasibility Analysis and conversations with staff confirm that the Forest Service has not reviewed Tribal land resource management plans that might be affected by the PolyMet Land Exchange.

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**Comment Number** LE 282-38

**Commenter Name** Paula Maccabee

**Comment** ☐ Specify with which provisions the PolyMet Land Exchange would be inconsistent with the Forest Plan unless the Plan is revised and which revisions would be proposed to allow the PolyMet Land Exchange and mining uses to proceed.

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**Comment Number** LE 282-40

**Commenter Name** Paula Maccabee

**Comment** Changes to the Forest Plan to support impairment and destruction of wetlands, upland vegetation and endangered species habitat for the proposed PolyMet Land Exchange and use of Federal lands are likely to be inconsistent with the standards of other federal agencies, such as the U.S. Fish and Wildlife Service and the U.S. Environmental Protection Agency as well as in substantial conflict with established management objectives on adjacent Federal lands, including Indian trust lands.

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**Comment Number** LE 282-69

**Commenter Name** Paula Maccabee

**Comment** Were a thorough SDEIS prepared in compliance with law, it would demonstrate that the PolyMet Land Exchange is not in the public interest and would interfere with Forest Service management objectives on Federal lands and Tribal ceded territories adjacent to and downstream from the PolyMet project site.

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**Comment Number** LE 282-73

**Commenter Name** Paula Maccabee

**Comment** WaterLegacy’s comments (infra, pp. 8-9) previously discussed federal rules and provisions of the Forest Service Handbook providing that a land exchange under the FLPMA must serve the public interest and that a public interest determination must include a finding that the intended use of the conveyed Federal land will not substantially conflict with established management objectives on adjacent Federal lands, including Indian trust lands. These comments then identified various provisions of the Superior National Forest Resource Management Plan (Forest Plan) pertaining to watersheds, vegetation and wildlife that must be analyzed in the SDEIS to determine whether conflicts require rejection of the proposed PolyMet Land Exchange.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 311-5

**Commenter Name** Ernest Lehmann

**Comment** • The exchange lands received by the USFS will compliment existing federal lands and will remove from the forest lands all ready impacted by transportation routes and nearby mining activities.

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**Comment Number** LE 312-1

**Commenter Name** Peter Leschak

**Comment** The Weeks Act of 1911, under which the Superior National Forest was established, was I intended for the preservation and enhancement of forest land, but also for the protection of watersheds. The sulfide mining activity proposed by PolyMet is clearly inimical to watershed protection. Serious and enduring contamination of water resources is guaranteed by this brand of mining. A specific and foolproof mitigation of this problem would be to prevent this operation in the first place. If the proposed land exchanges make it easier for the sulfide mining to proceed, then they would be a violation of the spirit of the Weeks Act-

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**Comment Number** LE 329-1

**Commenter Name** Ken Norenberg

**Comment** Proceed with all possible efficiency under the Weeks Act with this proposed land exchange.

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**Comment Number** LE 356-13

**Commenter Name** Kristin Henry

**Comment** It should also consider this cost-benefit analysis through the lens of the Superior National Forest objectives. For instance, Objective O-LA-I states that "Through various land adjustment procedures (e.g., purchase, donation, and exchange) and a landownership adjustment map, secure a land ownership pattern that supports and enhances total Forest Plan resource management objectives." The Forest Service should determine whether exchanging prime habitat that is a contiguous block actually enhances its resource management objectives.

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**Comment Number** LE 356-14

**Commenter Name** Kristin Henry

**Comment** Finally, the agency should use this thorough cost-benefit analysis to determine if the proposed action actually meets the Forest Service Strategic Plan Goals. The Forest Service should determine whether giving up prime endangered species habitat, valuable and rare peatlands, increasing air pollution impacts such that Minnesota will violate its Regional Haze State Implementation Plan really do "provide and sustain benefits to the American people." See Scoping Notice p. 2 (agency notes that the proposed land exchange meets its goal of benefiting the American people).

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 356-18

**Commenter Name** Kristin Henry

**Comment** VII. The Forest Service Must Review the Proposed Action for Consistency with the Superior National Forest Plan, Including Its Goals.

The Forest Service should analyze whether the proposed land exchange is consistent with the Superior National Forest Plan and its stated goals.

For instance, the Forest Plan contains Guideline G-LA-22, which states:

Land acquisitions will generally be guided by the following criteria: Priority 1 (a, b, and c are not listed in order of importance) 1(a) Land needed for habitat for federally listed endangered, threatened, proposed, or candidate species or for Regional Forester sensitive species. 1(b) Land needed to protect significant historical and cultural resources, when these resources are threatened or when management may be enhanced by public ownership. 1(c) Land needed to protect and manage administrative or Congressionally designated, unique, proposed, or recommended areas. Priority 2(a) thru (D are not listed in order of importance) Key tracts that will promote more effective management and will meet specific needs for management, such as: 2 (a) Land that enhances recreation opportunities, public access, and aesthetic values. 2(b) Land needed to enhance or promote watershed restoration or watershed improvements that affect the management of NFS land riparian areas. 2(c) Environmentally sensitive and/or ecologically rare lands and habitats. 2(d) Wetlands. 2(e) Land and associated riparian ecosystems on water frontage such as lakes and major streams. 2(D Land needed to achieve ownership patterns that would lower resource management costs. Priority 3 3(a) All other land desirable for inclusion in the National Forest System.

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**Comment Number** LE 395-2

**Commenter Name** Molly Woehrlin

**Comment** It would be a violation of federal laws, against the National Forest Management Plan, and very much in conflict with the public interest, as it would cause irreparable damage to the forest and its wildlife, as well as impact surrounding lands with the run off.

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**Comment Number** LE 431-1

**Commenter Name** Sherry Phillips

**Comment** I would like to see a reasonable explanation for exchanging these lands considering the intention of the Weeks Act to protect watersheds.

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**Comment Number** LE 449-1

**Commenter Name** Carl Sack

**Comment** The proposed land exchange between the Forest Service and Polymet is a borderline-illegal maneuver that runs directly counter to the intent of the Weeks Act, which is that lands purchased by the forest service "shall be permanently reserved, held, and administered as national forest lands." There is no right price or exchange that can justify breaking this public trust.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 452-1

**Commenter Name** Randy Neprash

**Comment** I am opposed to a land exchange that is meant to remove long-standing environmental protections on Superior National Forest public lands against strip mining. The land exchange would pave the way for PolyMet to strip mine national forest lands protected by the Weeks Act of 1911 and open a sulfide mining district across Minnesota's Arrowhead Region. A land swap if, approved, would have very negative environmental impacts on forests, wetlands and wildlife.

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**Comment Number** LE 452-2

**Commenter Name** Randy Neprash

**Comment** It is the obligation of the USFS to protect the land, air, water, animal and other natural resources of the public lands being proposed for exchange. The main purpose of this proposed land exchange is to remove long-standing environmental review and protections from public lands, which sets a dangerous precedent for exchanging public lands to private mining companies. The USFS currently has the ability and the requirement to control how PolyMet mines on USFS lands. It is in the public's long term interest that they retain that right.

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**Comment Number** LE 452-7

**Commenter Name** Randy Neprash

**Comment** 4. The proposed land exchange goes against the Weeks Act of 1911, which authorized the purchase of land by the federal government for the protection of watersheds, and prohibited strip mining. The land was to be held as National Forest lands forever. PolyMet needs a land exchange to remove the current environmental protections in order to open a strip mine. The U.S. Forest Service owns the surface rights to this land, but not the mineral rights. Therefore, it is my understanding that the underlying purpose of the land exchange would be to benefit a multinational mining company by removing the Weeks Act's protections against strip mining.

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**Comment Number** LE 452-13

**Commenter Name** Randy Neprash

**Comment** I request that USFS retain title to the lands and administer them as Weeks Act lands. It is the obligation of the USFS to protect the land, air, water, animal and other natural resources of the public lands being proposed for exchange.

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**Comment Number** LE 456-2

**Commenter Name** Dennis Szymialis

**Comment** The notice characterizes the law as a conflict. The Weeks Act prohibits mining. This is a properly legislated and long standing law enacted in 1922. The notice indicates the Forest Services contempt for the law and the rights of the American people through their duly elected representatives. "Improve management effectiveness" has no meaning so as to make it an appropriate basis for action.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 456-9

**Commenter Name** Dennis Szymialis

**Comment** If politicians in Minnesota want sulfide mining they should use their own mineral interests as an experiment and not those under the control of the Weeks Act which denies rather than grants authority for mining.

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**Comment Number** LE 456-11

**Commenter Name** Dennis Szymialis

**Comment** The PolyMet/LTV tailings basin continues to be out of compliance with the environmental law. The Forest Service should not be allowed to do that which Congress refused to do through its refusal to pass Jim Oberstar's HR 4292 which is the same action requested.

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**Comment Number** LE 462-2

**Commenter Name** Frank Ongaro

**Comment** The exchange helps the Forest Service meet three Strategic Planning Goals by providing long-term socioeconomic benefits, conserving open space, and enhancing outdoor recreation opportunities. The lands offered by PolyMet in the exchange are located throughout the Superior National Forest and compliment existing federal lands with forest, wetlands, and waterfront habitats. The Hay Lake track, for example, includes a known wild rice lake and approximately 8 miles of the Pike River.

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**Comment Number** LE 465-3

**Commenter Name** Tod Rubin

**Comment**

1. What guidance does the 2004 Forest Plan give regarding land exchanges? If there is no guidance, then Superior National Forest should first develop policies and procedures for about land exchanges in general, before proceeding with any specific land exchange. Explain Superior National Forest's general policies and procedures regarding land exchanges.
2. What role did Superior National Forest have in selecting the non-federal lands to be exchanged? Superior National Forest appears to have accepted the Polymet proposal without question, according to the statement (introduction, page 2) that "All tracts were assembled by Polymet for the purpose of this proposed exchange". Explain Superior National Forest's policy and procedure for selecting lands to be obtained in such exchanges.

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**Comment Number** LE 486-1

**Commenter Name** Peter Dziuk

**Comment** I am concerned about the proposed land exchange between the USFS and PolyMet Mining Inc. This is nothing about a "fair" land swap – but as noted – a "connected action" to a proposed environmentally destructive project. Also, while suggesting otherwise, the proposed exchange does not in any way demonstrate that it meets, let alone exceeds, four of the Forest Service's Strategic Plan goals.

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**PLN Conformance with USFS Plans and Objectives**

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**Comment Number** LE 486-3

**Commenter Name** Peter Dziuk

**Comment** For the goal to “provide and sustain benefits to the American people (desired outcome is forests with sufficient(?) long-term multiple socioeconomic benefits to meet the needs of society), it fails completely – this is a de-forestation action. The present disposition of this tract meets that end, and cannot be improved upon. Any inference to economic benefit cannot be quantified within a forest management paradigm and becomes an equivocation to purposes anathema to the environmental spirit and vision. What economic benefits can be referenced are predetermined – the lion’s share going to outsiders – Minnesota resources, both mineral and environmental - offered up to internationals.

To “conserve open space” – this is a qualitative, not quantitative statement. The present space is already completely open and carpeted with a rich ecologically diverse and living epidermis – a protective skin. This land exchange would create more open space that by definition is erased – non- protective – nonliving

– to perpetuity. To “sustain and enhance outdoor recreation opportunities” – this already exists on site.

The present

conditions are the definition of sustainability and open for public recreation. Exchanging them away is to remove sustainability and no public recreation of higher value is created. It is a self serving presumption that this exchange translates into more people using better land elsewhere. In “maintaining basic management capabilities of the Forest Service by reducing landlines and mineral conflicts” – this maintains nothing and the small numerical net gain of decreased landlines does not equate into better management capabilities. The site is now under full Forest Service management and should & can basically be kept that way. While everyone should move and live to reduce all conflicts, mineral extraction is inherently conflictual with ecological and environmental goals and should not be pre-empted or avoided. The Forest Service’s mandate by definition lies in management of forest as forest. That private (?)mineral wealth is overlaid by public forest is no imperative for the Forest Service to abrogate its duty to conflict. It is no secret that other potentially rich and exploitable mineral deposits and proposed projects lie under other public forest resources. To acquiesce to this exchange sends an ominous warning to future public forest interests and brings into question the Forest Service’s ability, vision and integrity of securing and managing our forest resources for our children.

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**Comment Number** LE 486-4

**Commenter Name** Peter Dziuk

**Comment** It cannot be shown that adding a single foot of these private holdings to FS management expands or improves upon FS mission and goals.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 486-5

**Commenter Name** Peter Dziuk

**Comment** By and large all of these pieces of private property are paradoxically irrelevant in their exchange while being intrinsically imperative to the long term FS mission. Whether their ownership has fallen inside or outside the public domain has little impact on their environmental function as it exists today. They are small and relatively underutilized and generally un-exploitable. The regional geography, topography, ecology and economy is necessarily the predominant management template under which they exist. Adding that they mostly lie isolated and scattered between predominantly state, county and federal ownership, present regional public management, pragmatically, is the de facto management strategy implemented. That most are essentially not managed at all, for these reasons any exchange becomes nearly mute in public value. "Enhancement" is theoretical only. The FS cannot demonstrate their incorporation improves their lot significantly. Even what private use or abuse might incur is marginal and obscene as compared to the already highly demonstrated and purposefully intended future corruption of present federal land.

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**Comment Number** LE 486-6

**Commenter Name** Peter Dziuk

**Comment** Of the five tracts, the fifth implies more merit than the rest in evoking its proximity to the BWCA. But here too, reality trumps theory. That it is near an important entry point is of no consequence for FS inclusion and cannot be demonstrated to be an area enhancement at all. McFarland lake is and will likely remain mostly outside of federal jurisdiction because it is deemed and desired of higher private value. As ownership and public accessibility presently stand, it has not even been demonstrated that enhancement is required let alone to be realized. If these parcels are of such great consequence and justifiable, another more appropriate and less destructive acquisition strategy can easily be implemented.

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**Comment Number** LE 566-3

**Commenter Name** Marc Fink

**Comment** The Forest Service acknowledges that most of the lands proposed to be conveyed to PolyMet were acquired by the United States under the Weeks Act, which restricts the Forest Service from allowing surface mining as proposed by PolyMet. The Weeks Act, Section 12, states that the lands acquired under the Act shall be permanently reserved, held, and administered as national forest lands. The Forest Service must explain how the conveyance of these lands would be consistent with the Weeks Act.

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**Comment Number** LE 566-4

**Commenter Name** Marc Fink

**Comment** Related to the Weeks Act, the Forest Service must fully disclose to the public how each of the tracts of lands to be conveyed were originally acquired by the United States, including all relevant statutes, regulations, proclamations, deeds and restrictions. Similarly, the Forest Service must fully disclose the surface and mineral ownership, along with all relevant restrictions and provisions, for all tracts of lands that would be acquired by the United States under the proposed land exchange. Such information is critical to the public's understanding of the economic impacts of the proposed exchange, the potential environmental consequences, and compliance with all applicable laws.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 566-5

**Commenter Name** Marc Fink

**Comment** The Forest Service has issued regulations governing land exchanges. 36 C.F.R. Part 254. The Forest Service must explain and disclose in the Draft EIS how the proposed land exchange complies with each of these regulatory requirements, including but not limited to:

36 C.F.R. § 254.1(e), which states that the boundaries of a national forest are automatically extended to encompass lands acquired under the Weeks Act, provided the acquired lands are contiguous to existing national forest boundaries and total no more than 3,000 acres in each exchange;

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**Comment Number** LE 566-10

**Commenter Name** Marc Fink

**Comment** Pursuant to these regulations, in determining whether a proposed land exchange will serve the public interest, the Forest Service must therefore find that the intended use of the conveyed lands will not substantially conflict with established management objectives on adjacent Federal lands, including Indian Trust lands. 36 C.F.R. § 254.3(b)(2)(ii). Similarly, the Forest Service must insure that scenic, wildlife, environmental, historic, archaeological, or cultural values will not be substantially affected or impaired. 36 C.F.R. § 254.36(c)(5). Based on the comments submitted on the Draft EIS for the NorthMet mine proposal by the Tribes, EPA, the Center, and other interested parties, there is simply no rational way to conclude that the intended use of the conveyed lands will not substantially conflict with management objectives, and that scenic, wildlife, environmental, historic, archaeological, or cultural values will not be substantially affected or impaired, and thus the proposed exchange cannot proceed.

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**Comment Number** LE 566-12

**Commenter Name** Marc Fink

**Comment** The Forest Service must plainly disclose during the NEPA process any additional policies or internal procedures concerning land exchanges on National Forest System lands, including those specific to Weeks Act lands. This includes any policy regarding the acceptance of lands through a land exchange where the subsurface rights are not included. This also includes the need for Congressional oversight for land exchanges involving the Weeks Act that exceed \$25,000 in value.

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**Comment Number** LE 566-13

**Commenter Name** Marc Fink

**Comment** According to the Forest Service, the proposed NorthMet mine could not occur on these lands without the proposed land exchange, because the mineral rights leased to PolyMet do not include the right to open pit mine national forest system lands. The no action alternative must therefore assume that no surface mining would occur, and compare the environmental impacts of the proposed alternative, in which an open pit mine is recognized as a connected action. See *Center for Biological Diversity v. U.S. Department of the Interior*, 2010 U.S. App. LEXIS 19767 (9th Cir. Sept. 23, 2010).

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 566-14

**Commenter Name** Marc Fink

**Comment** The Forest Service must better explain the purpose and need for this proposal. 40 C.F.R. § 1502.13. The scoping notice states that the purpose and need for the proposed land exchange “is to eliminate conflicts between federal land management responsibilities of the Forest Service and the private mineral estate, in which PolyMet holds an interest.” First, it is the Center’s understanding that for the majority of lands acquired by the Forest Service pursuant to the Weeks Act, which now comprise the Superior National Forest, the Forest Service owns only the surface rights. It is also common knowledge that mining companies hold mineral rights and are conducting exploration across the Superior National Forest. For the Forest Service to simply exchange these national forest lands whenever there is a “conflict” between the Forest Service’s management and the private mineral estate, would violate the very intent and purpose of acquiring these lands under the Weeks Act.

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**Comment Number** LE 566-15

**Commenter Name** Marc Fink

**Comment** Moreover, the Forest Service must rationalize its purpose and need in light of the fact that the lands it would receive under the exchange would come with the very same “conflict” of a split estate between the Forest Service and the private mineral estate. Rather than protect the Superior National Forest for future generations, as the Weeks Act intended, it appears that the Forest Service is proposing to establish a perpetual shell game in which it will repeatedly exchange surface lands with mining companies in order to allow for the open pit mining of the mineral estate, until such time as the public forests, wetlands, and waters are destroyed.

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**Comment Number** LE 566-24

**Commenter Name** Marc Fink

**Comment** Pursuant to the NHPA, the Forest Service must consider the effects of the proposed land exchange on any district or site that is included in or eligible for inclusion in the National Register, and afford the Advisory Council on Historic Preservation an opportunity to comment with regard to the proposal. 16 U.S.C. § 470(f); Muckleshoot Indian Tribe v. U.S. Forest Service, 177 F.3d 800 (9th Cir. 1999). Under the NHPA, the Forest Service must make a reasonable and good faith effort to identify historic properties, 36 C.F.R. § 800.4(b); determine whether identified properties are eligible for listing on the National Register based on criteria in 36 C.F.R. § 60.4; assess the effects of the proposed action on any eligible historic properties found, 36 C.F.R. §§ 800.4(c), 800.5, 800.9(a); determine whether the effect will be adverse, 36 C.F.R. §§ 800.5(c), 800.9(b); and avoid or mitigate any adverse effects, 36 C.F.R. §§ 800.8(e), 800.9(c). The Forest Service must confer with the State Historic Preservation Officer (“SHPO”) and seek the approval of the Advisory Council on Historic Preservation (“Council”). The Forest Service must demonstrate and disclose full compliance with the NHPA in subsequent NEPA analysis.

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**Comment Number** LE 566-25

**Commenter Name** Marc Fink

**Comment** The Forest Service must demonstrate that the proposed land exchange would comply with all applicable provisions and requirements of the Forest Plan for the Superior National Forest. 16 U.S.C. § 1604(i); see also 36 C.F.R. § 254.3(f). The Draft EIS must therefore list all Forest Plan standards, guidelines, and other provisions that apply, and demonstrate how this proposed land exchange would be consistent with each of those requirements.

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**PLN            Conformance with USFS Plans and Objectives**

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**Comment Number** LE 574-1

**Commenter Name** Avangelina Tamis McKnight

**Comment**            I am concerned about the proposed land exchange between the USFS and PolyMet Mining Inc. This is nothing about a "fair" land swap - but as noted - a "connected action" to a proposed environmentally destructive project. Also, while suggesting otherwise, the proposed exchange does not in any way demonstrate that it meets, let alone exceeds, four of the Forest Service's Strategic Plan goals.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 574-3

**Commenter Name** Avangelina Tamis McKnight

**Comment** For the goal to "provide and sustain benefits to the American people (desired outcome is forests with sufficient(?) long-term multiple socioeconomic benefits to meet the needs of society), it fails completely - this is a de-forestation action. The present disposition of this tract meets that end, and cannot be improved upon. Any inference to economic benefit cannot be quantified within a forest management paradigm and becomes an equivocation to purposes anathema to the environmental spirit and vision. What economic benefits can be referenced are predetermined - the lion's share going to outsiders - Minnesota resources, both mineral and environmental - offered up to internationals.

To "conserve open space" - this is a qualitative, not quantitative statement. The present space is already completely open and carpeted with a rich ecologically diverse and living epidermis - a protective skin. This land exchange would create more open space that by definition is erased - non- protective - non-living - to perpetuity.

To "sustain and enhance outdoor recreation opportunities" - this already exists on site. The present conditions are the definition of sustainability and open for public recreation. Exchanging them away is to remove sustainability and no public recreation of higher value is created. It is a self serving presumption that this exchange translates into more people using better land elsewhere.

In "maintaining basic management capabilities of the Forest Service by reducing landlines and mineral conflicts" - this maintains nothing and the small numerical net gain of decreased landlines does not equate into better management capabilities. The site is now under full Forest Service management and should & can basically be kept that way. While everyone should move and live to reduce all conflicts, mineral extraction is inherently conflictual with ecological and environmental goals and should not be pre-empted or avoided. The Forest Service's mandate by definition lies in management of forest as forest. That private (?)mineral wealth is overlaid by public forest is no imperative for the Forest Service to abrogate its duty to conflict. It is no secret that other potentially rich and exploitable mineral deposits and proposed projects lie under other public forest resources. To acquiesce to this exchange sends an ominous warning to future public forest interests and brings into question the Forest Service's ability, vision and integrity of securing and managing our forest resources for our children.

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**Comment Number** LE 574-4

**Commenter Name** Avangelina Tamis McKnight

**Comment** It cannot be shown that adding a single foot of these private holdings to FS management expands or improves upon FS mission and goals.

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**PLN                    Conformance with USFS Plans and Objectives**

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**Comment Number** LE 574-5

**Commenter Name** Avangelina Tamis McKnight

**Comment** By and large all of these pieces of private property are paradoxically irrelevant in their exchange while being intrinsically imperative to the long term FS mission. Whether their ownership has fallen inside or outside the public domain has little impact on their environmental function as it exists today. They are small and relatively underutilized and generally un-exploitable. The regional geography, topography , ecology and economy is necessarily the predominant management template under which they exist. Adding that they mostly lie isolated and scattered between predominantly state, county and federal ownership, present regional public management, pragmatically, is the de facto management strategy implemented. That most are essentially not managed at all, for these reasons any exchange becomes nearly mute in public value. "Enhancement" is theoretical only. The FS cannot demonstrate their incorporation improves their lot significantly. Even what private use or abuse might incur is marginal, and obscene as a comparison to the already highly demonstrated and purposefully intended future corruption of present federal land.

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**Comment Number** LE 574-6

**Commenter Name** Avangelina Tamis McKnight

**Comment** Of the five tracts, the fifth implies more merit than the rest in evoking its proximity to the BWCA. But here too, reality trumps theory. That it is near an important entry point is of no consequence for FS inclusion and cannot be demonstrated to be an area enhancement at all. McFarland lake is and will likely remain mostly outside of federal jurisdiction because it is deemed and desired of higher private value. As ownership and public accessibility presently stand, it has not even been demonstrated that enhancement is required let alone to be realized. If these parcels are of such great consequence and justifiable, another more appropriate and less destructive acquisition strategy can easily be implemented.

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**PLN                    Conformance with USFS Plans and Objectives**

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**Comment Number** LE 581-6

**Commenter Name** Steve Koschak

**Comment**            Precedence for USFS land exchanges within the Superior National Forest have been set in Minnesota. The River Point land exchange, the land exchanges of the other resorts (Timber Bay Lodge and Houseboats, Big Lake Wilderness Lodge, Roaring Stony Lodge) in Minnesota, the land exchange of the private properties on Ojibway Lake, north of Ely, and the recent land exchange of the South Kawishiwi Summer Home group had to follow the letter of "law" as they relate to land exchanges with the US Forest Service, including the preservation of the quality of the land, the quality of the water, the character of the forest and surrounding area, the wildlife, every single variety of plant life, and to maintain the integrity and presence of the property.

How then, is it that a multinational corporation, which proposes to utilize Strip Mining with the sole purpose of extraction of mineral for private gain, resulting in destruction and decimation of the environment does not have to follow the rules and the precedence related to USFS land exchanges that must "serve the public interest based upon an environmental analysis" and based upon the long standing Weeks Act of 1911 which prohibits the destruction of USFS public lands and watersheds?

The USFS has made a serious error. According to the Weeks Act, this surface land should not be sold outright, or via a land exchange to a foreign mining company. Instead that company must confine its mining to underground operations. Furthermore, in April of 2007, the PolyMet Wetlands Mitigation Plan was ruled to be illegal by Judge Heather Sweetland. In 2010, the EPA advised the ACOE to revise the wetland mitigation plans as laid out in the PolyMet DEIS. The DEIS itself was rated as environmentally unsatisfactory.

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**Comment Number** LE 581-12

**Commenter Name** Steve Koschak

**Comment**            Supervisor Sanders, do you realize the significance of this possible land exchange to be made by your Duluth office for PolyMet? I think you do. Will this proposed land exchange with PolyMet follow the protocol that River Point and others had to follow in their respective land exchanges, whereby the Milwaukee Regional Office and the D.C. Office were involved? This is of national importance and significance and the procedural precedence should be followed.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 585-5

**Commenter Name** Bradley Sagen

**Comment** Conflicts with 2004 Forest Plan

In addition to fulfilling its mandate to safeguard National Forest lands and resources as discussed earlier, USFS must also meet its obligations under the 2004 Superior National Forest Resource Management Plan (Forest Plan). Federal rules state that, "The authorizing official should consider only those exchange proposals that are consistent with land and resource management plans." 36 C.F.R. 254.3(a).

The project document does not address the potential mining uses of the lands and their impact on public lands and resources. Open pit mining would destroy surface resources. This is not acknowledged.

Courts have held that agencies cannot assume that the nature and extent of mining activities will be the same whether the United States still owns the land. Because of the current lease restrictions on open pit mining, consideration of the implications of transfer of ownership is especially important.

Conclusion. An evaluation of the proposed exchange against the goals and standards of the 2004 Forest Plan must be considered as part of the SDEIS. The SDEIS must describe how the future use of federal lands for open pit mining represents an environmentally sustainable use of federal resources under the terms of the 2004 Plan.

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**Comment Number** LE 587-4

**Commenter Name** Alan Muller

**Comment**

The Forest Service Document "Proposed NorthMet Mining Project and Land Exchange" states at page 2 that "The proposal meets four Forest Service Strategic Plan Goals ...." This statement seems prejudicial. Such a conclusion could only be properly drawn after the completion of adequate environmental review pursuant to the National Environmental Policy Act.

The proposal must also be, and seemingly is not, consistent with the Forest Plan for the Superior National Forest.

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**Comment Number** LE 598-3

**Commenter Name** Karen Updegraff

**Comment**

In exchanging lands held in public trust to a company that will destroy these lands for private benefit and short term gain, with potential long-term damage to the health of adjacent waterways, the USFS fails to uphold that mission. The lands offered in exchange should meet criteria that guarantee to more than offset the long-term ecological damage that will inevitably result from mineral extraction. This means they should either: provide hitherto absent wildlife corridors, protect a currently unprotected water body, or conserve a tract of forest or wetland with unique ecological value. Based on the maps and descriptions provided, it is unclear whether any of the proposed exchange tracts do any of that. While eliminating some gaps in federal ownership is certainly a positive outcome, it is not sufficient in light of the precedent-setting sacrifice of forest land.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 612-1

**Commenter Name** William Andersen

**Comment** I would like to add my comments on the proposed land exchange currently being considered. Although the strategic goal of benefiting the American people is implied, there is no guarantee that the metals produced by this mining adventure will even be returned to the American economy! Strategic goal #2 is muted since this is an acre for acre swap albeit allowing for consolidation with existing USFS lands. The argument that the federal land to be given up is already abutting existing mining-impacted lands might wash if we were talking about adding ferrous mining, but this is sulfide mining which as we all know is a completely different beast.

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**Comment Number** LE 627-1

**Commenter Name** Betsy Daub

**Comment** The Land and Resource Management Plan, 2004 ("Forest Plan") for the Superior National Forest outlines forest-wide goals that guide the management of resources on the Forest. The Friends with our comments outlines areas where we believe key goals with the Forest Plan are not likely to be met with this exchange. These are issues that need significant analysis and attention through environmental review. Forest Plan goals that need a high level of attention in this proposed project include:

- \* Promote ecosystem health and conservation using a collaborative approach to sustain the nation's forests and watersheds
- \* Protect, and where appropriate, restore soil, air and water resources
- \* Provide for a variety of life by managing biologically diverse ecosystems
- \* Provide a variety of uses, values, products and services for present and future generations by managing within the capability of sustainable ecosystems
- \* Contribute to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner
- \* Contribute to efforts to sustain the American Indian way of life, cultural integrity, social cohesion, and economic well-being

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**Comment Number** LE 627-7

**Commenter Name** Betsy Daub

**Comment** The analysis by the Forest Service needs to fully examine what net loss of wetlands will occur from this land exchange and what that loss means to the Lake Superior Watershed. The public should be fully informed that a land exchange will result in an actual loss of wetlands in Minnesota. Indirect impacts need to be more fully characterized. The Forest Service needs to articulate how they characterize the wetlands on the federal lands, how this may differ from the DEIS, and if those differences translate into additional wetland impacts. Hydrologic impacts to wetlands outside of the proposed exchange parcel should also be examined. The Forest Service should conduct a comparison analysis of the impacts from the potential loss and gain of wetlands in different watersheds. The results of this entire analysis should be used to examine whether the proposal meets this stated Forest Plan Goal of protecting the nation's watersheds.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 627-10

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
In the Friends' DEIS comments, we provided detailed recommendations for addressing pollution concerns affecting the watersheds of the St. Louis River and Lake Superior (see attached comments). The Forest Service in analyzing the potential impacts of the proposed land exchange and its impacts on the watershed, needs to fully understand changes in the Supplemental DEIS (SDEIS) being prepared at this time. The SDEIS is supposed to adequately respond to the concerns raised by the EPA and other organizations and individuals. Only in light of this additional analysis can the lasting effects of the land exchange be understood. If the SDEIS appropriately addresses watershed pollution concerns, then the impacts of the land exchange will be seen differently than if the SDEIS fails to address these issues. With the additional information, the Forest Service should examine whether the proposal meets the Forest Plan Goal of protecting the nation's watersheds.

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**Comment Number** LE 627-18

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
The land exchange is an integral component in a mining project with identified significant air impacts to the Boundary Waters Canoe Area Wilderness and other public Class I airsheds. In assessing whether an exchange is in the best interests of the public and for the air resources over public lands, the Forest Service will need to examine potential impacts to air resources from the mine project. The additional analysis within the SDEIS need to be fully understood before any benefits or costs of this proposed exchange can be satisfactorily known. The Forest Service will need to assess proposed mitigation measures and determine if they adequately address the air pollution problems. Air impacts should include a full cumulative impacts assessment. The exchange and the subsequent mine need to be assessed for impacts in meeting the Regional Haze goals. The analysis should examine if the exchange meets the Forest Plan Goal of protecting and restoring air resources.

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**Comment Number** LE 629-3

**Commenter Name** Christopher Krupp

**Comment** NorthMet's use of the selected lands would almost certainly conflict with the existing management of adjacent Superior National Forest lands.  
Forest Service regulations regarding land exchanges limit land trades to those in which the official authorized to make the trade has determined that the intended use of the conveyed Federal land will not substantially conflict with established management objectives on adjacent Federal lands. 36 C.F.R. § 254.3(b)(2)(ii). The Environmental Protection Agency's letter of February 18, 2010, identified adverse impacts of sufficient magnitude to conclude the proposal must not proceed in its current state. Given EPA's determination, as well as the adverse impacts identified by many parties commenting on the NorthMet Project DEIS, it is apparent that NorthMet's proposed mine would substantially conflict with the management objectives of adjacent Superior National Forest land and that this proposal must therefore ultimately be rejected. Regardless, the Draft EIS for this proposal must identify and discuss the Superior National Forest's existing management objectives for the land it manages adjacent to the parcels NorthMet has selected for this trade proposal. The DEIS must also discuss how the Forest Service believes it would manage adjacent Superior National Forest land if the proposed trade were to be consummated.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 629-4

**Commenter Name** Christopher Krupp

**Comment** The Forest Service must properly evaluate the No Action Alternative in the Draft Environmental Impact Statement.

According to your letter requesting these comments, the proposed NorthMet mine could not occur on these lands without the proposed land exchange, as the Weeks Act prohibits such mining on lands acquired under its authority. Analysis of the no action alternative must therefore be based on the proper assumption that no surface mining would take place on the selected Federal lands. See *Center for Biological Diversity v. U.S. Department of the Interior*, 2010 U.S. App. LEXIS 19767 (9th Cir. Sept. 23, 2010). The environmental impacts of the no action alternative must be compared with the likely impacts of the proposed alternative of an open pit sulfide mine on the Federal lands.

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**Comment Number** LE 629-5

**Commenter Name** Christopher Krupp

**Comment** The Forest Service must explain how the exchange proposal meets the requirements of the Weeks Act. The Weeks Act requires that the non-Federal land to be acquired via trade be within the watershed of a navigable stream and be valuable chiefly for the regulation of the flow of that stream or for the production of timber. The Forest Service has not provided any information in the scoping materials that indicates that the five non-Federal tracts offered by NorthMet are chiefly valuable either for timber production or the regulation of the flow of a navigable stream. Without such information, the proposed exchange is not authorized by law.

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**Comment Number** LE 629-6

**Commenter Name** Christopher Krupp

**Comment** The Forest Service must explain why the Superior National Forest lands selected by NorthMet were originally acquired under the authority of the Weeks Act. The purpose and need for Weeks Act acquisition of the selected Federal lands remain relevant and may warrant the Forest Service retaining those lands. The Draft Environmental Impact Statement should provide a detailed history of the lands that NorthMet seeks to acquire so that the public can understand whether giving up these lands conflicts with the purpose and need for their earlier acquisition by the Forest Service. Such a history will also help the public evaluate whether the proposed trade is in the best interest of the public, as required by the Federal Land Policy and Management Act.

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**Comment Number** LE 704-1

**Commenter Name** John Roth

**Comment** First, the exchange must be consistent with the Superior National Forest Land and Resource Management Plan and any final project plan that might be impacted by the proposed exchange. Exchanges that deviate from those plans obviously should not be allowed without strongly compelling reasons.

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## PLN Conformance with USFS Plans and Objectives

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**Comment Number** LE 704-2

**Commenter Name** John Roth

**Comment** Second, the exchange must be for an appropriate public purpose. Being merely consistent with the Land and Resource Management Plan is insufficient. A proposed exchange should do more than that. It should help the Forest Service achieve those management objectives by obtaining lands that are needed for recreational purposes, to protect wildlife corridors and habitat, to preserve or enhance the aesthetics of an area, or to protect historically significant properties. Exchanges that primarily benefit private parties, whether individuals or businesses, are not appropriate; nor are exchanges that simply help the Forest Service avoid or settle lawsuits, especially if the outcome of the suit is in question. Such exchanges would simply encourage more and more lawsuits, which is not in the public's interest.

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**Comment Number** LE 704-3

**Commenter Name** John Roth

**Comment** Third, proposed exchanges should help the Forest Service obtain lands it couldn't otherwise obtain. If the land can be purchased or obtained by other means, it should be. In other words, the exchange should be done only if all others ways for obtaining the land have been exhausted.

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## SOC      Socio-economic Impacts

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**Comment Number** LE 033-1

**Commenter Name** Julie Champlin

**Comment** I am appalled at this idea and do not understand why we should risk losing any of this pristine land and water, our beloved northern Minnesota. I do not understand how we can trade off 20 years of mining to suffer up to 2000 years in pollution! this will also affect our ecotourism industry where people retreat to enjoy the beauty of nature.

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**Comment Number** LE 170-13

**Commenter Name** Elanne Palcich

**Comment** The opening of a sulfide mining district would replace tourism, recreation, real estate, forestry, fisheries, and habitat.

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**Comment Number** LE 250-2

**Commenter Name** T.E. Alget

**Comment** Polymet Mining promises tremendous economic opportunity for an economically troubled part of our state-creating hundreds of jobs with wages that can support families and helping to diversify our economy. These jobs are critical for the men and women who choose to live and work in northeastern Minnesota.

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**Comment Number** LE 280-4

**Commenter Name** Esteban Chiriboga

**Comment** GLIFWC staff are concerned that the shortcomings of the NorthMet DEIS have been carried forward in the feasibility analysis. For example, the FA includes information supplied by PolyMet Mining indicating that only economic benefits are associated with the proposed project. That analysis ignored abundant and well accepted information on the negative effects of a mining economy (e.g. Boom-bust cycles, reduction in tourism, etc). It is unclear if any information on the negative economic impacts of mine projects were incorporated into the FA. We hope that more balanced data and information for socioeconomics and other resource areas will be used in the development of the SDEIS.

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**Comment Number** LE 283-12

**Commenter Name** Margaret Watkins

**Comment** A thorough evaluation of how usufructuary rights may be affected by the land exchange and proposed mine, including potential socioeconomic and cumulative effects impacts must be included in the SEIS.

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**Comment Number** LE 302-6

**Commenter Name** Kevin Proescholdt

**Comment** The Forest Service must describe how the proposed exchange would help it meet its goal of contributing to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner.

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**Comment Number** LE 302-8

**Commenter Name** Kevin Proescholdt

**Comment** The Forest Service must describe how the proposed exchange would help it meet its goal of contributing to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner.

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## SOC      Socio-economic Impacts

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**Comment Number** LE 305-6

**Commenter Name** Maureen Johnson

**Comment** Some of the people want jobs, but a far greater number are enjoying and will enjoy in the future all the other uses of SNF which will be affected by the mines. SNF should press for a closer number on how many local Iron Range people will be hired vs how many will be brought in from other areas. SNF should work out these numbers and its various ways of interpretation. SNF should work out how many generations. Regardless, the appearance and essence is that USFS will be making a value judgement on who is more important, locals with jobs in a slow economy or affected non-minerals users of the SNF.

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**Comment Number** LE 311-4

**Commenter Name** Ernest Lehmann

**Comment** • Move the NorthMet project forward, providing badly needs construction and permanent jobs in the area as well as tax revenues and other economic benefits to the state and local communities.

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**Comment Number** LE 343-2

**Commenter Name** Mary Black

**Comment** While this privately-held tract of land is currently non-taxable, it could potentially be put back on the tax rolls if its use by the college were to change or if it were sold to another private party in the future. Therefore, Cook County would prefer that the U.S. Forest Service not acquire this parcel.

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**Comment Number** LE 345-1

**Commenter Name** Michael Schelmeslie

**Comment** I am writing this comment in a time of economic down time I hope that the promise of lots of high paying jobs will not cloud the minds of people to the environmental effects of the proposed mines.

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**Comment Number** LE 371-1

**Commenter Name** Anne Stewart Uehling

**Comment** Jobs are good. Care must be taken to balance consideration of what will be lost with what will be gained.

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**Comment Number** LE 373-2

**Commenter Name** Norm Voorhees

**Comment** should move forward so there can be responsible mining and a job creation in northeastern Minnesota.

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**Comment Number** LE 400-3

**Commenter Name** Douglass A. Buell

**Comment** The proposed PolyMet mine and processing plant will provide an economic boost to this area that has been missing for many years.

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**Comment Number** LE 420-2

**Commenter Name** Gretchen Flynn

**Comment** 400 jobs are important but not as important as clean water. If this mine is approved we run a terrible risk of permanently destroying a vital resource.

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## SOC      Socio-economic Impacts

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**Comment Number** LE 456-6

**Commenter Name** Dennis Szymialis

**Comment** It only invites more mining and less access for other use. It also enables Minnesota's failed tax policy of severing mineral interests after a tax forfeiture. Even though Minnesota has over assessed most of Northeastern Minnesota for the purpose of stealing away peoples property for the benefit of mining more is sought from the people of the U.S. The experiment of Minnesota, unlike any other state, to sever mineral interests on tax forfeiture is a failure of economic development.

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**Comment Number** LE 456-7

**Commenter Name** Dennis Szymialis

**Comment** Local governments complain that their tax base is eroded by the reservation from taxation of federal land. No effort has been made by them to ask their own state to put state severed mineral interest reservations back on the tax roles or to sell these reserved interests back to surface owners to provide for a balanced budget. Reserved mineral interests cloud titles and discourage economic development by discouraging other uses due to the uncertainty of condemnation. Businesses won't develop this property with large infrastructure investments when mining takes a priority. So it is with the Weeks Act and PolyMet. If mining takes a priority the remainder of the forest is devalued along with other forests. The devaluation of the forest devalues the forest as a base for multi-use and recreation. The economy of Northeastern Minnesota is in trouble because of failed tax policy which has caused a dependency in the form of an addiction to mining. It is not for anyone's benefit to continue to feed or enable this addiction for the sake of theoretically cheaper commodities. It is not in anyone's best interest to subsidize commodity prices at the expense of our national forest system and the recreation that they provide. Some of the recreation can be translated into direct economic benefit like tourism and some of it is an intangible benefit to our standard of living that belongs to the people of the U.S. and not a foreign owned corporation that seeks special favor. One might ask if the benefit being requested by PolyMet is one that is available to anyone who purchases mineral interests subject to the Weeks Act but the more appropriate question is if PolyMet is the first and only one to get this benefit. This is a policy of lack of notice to those not benefitting, fundamentally unfair and arbitrary and capricious.

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**Comment Number** LE 457-17

**Commenter Name** Jane Koschak

**Comment** 17.How can the USFS ignore the potential impact of mining on the present tourism and recreation industries, and forestry and fisheries as related to federal lands?

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## SOC      Socio-economic Impacts

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**Comment Number** LE 466-2

**Commenter Name** Dan Marich

**Comment**      The large tract of land that PolyMet has purchased would be a hugely beneficial addition to the U.S. Forest Service, providing sensible and responsible access for the public, outdoorsmen, women and youth. In addition, more wetlands will be acquired along with lakes for ricing. All the while, this will provide the opportunity for good paying jobs and diversifying our economy. The parcels that PolyMet has purchased will not only help them secure ownership of the surface rights above their mineral leases, but also helps the U.S. Forest Service strategically provide recreational opportunities for the public, conserve open spaces and stimulate long range socioeconomic benefits for the future.

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**Comment Number** LE 475-1

**Commenter Name** Lorie Skudstad

**Comment**      Minnesota Power recognizes the significant positive socioeconomic impact to the region resulting from the NorthMet Project, which will be reusing an existing facility to process the area's native minerals. This project will bring growth and revitalization to the Eastern Mesabi Range, which was economically devastated by the closure of LTV Steel Mining Co. in 2001.

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**Comment Number** LE 485-2

**Commenter Name** JoAnn M. Olson

**Comment**      Polluting the water and environment far outweigh the economic benefits of 400 jobs to the region.

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**Comment Number** LE 485-5

**Commenter Name** JoAnn M. Olson

**Comment**      I also wonder if anyone has considered the economic impact on people and businesses who are not part of the mining industry, e.g., tourist, educational, recreational and artist endeavors. What will it mean to those of us who work in these realms when the environment is laid waste?

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**Comment Number** LE 508-1

**Commenter Name** Sean Skibbie

**Comment**      I am particularly concerned by the impact of this proposal on a tourism industry that brings millions to the region annually. This is a project that will bring in a small amount of profit at the expense of a sustainable tourism industry that offers billions in future revenue.

The Superior National Forest should be conserved, as it has been since 1911. This was a promise made to the American people and Minnesotans by its government, one that has been standing for almost 100 years. It should not be broken today, tomorrow, or at any other point in the future.

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**Comment Number** LE 591-3

**Commenter Name** John Waterbury

**Comment**      5. jobs are needed for the region as well as the state

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## SOC      Socio-economic Impacts

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**Comment Number** LE 595-4

**Commenter Name** Dale Tranter

**Comment** While I am not insensitive to the economic conditions prevalent throughout Northeastern Minnesota and the positive impact that the jobs created by the mine will have on the area, I would not want to see a relatively limited number of jobs created in the short term destroy this area's unique ecology for generations to come.

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**Comment Number** LE 627-56

**Commenter Name** Betsy Daub

**Comment** The scoping materials for the land exchange proposal do not outline what socioeconomic benefits they bring or offset from the loss of federal lands.

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**Comment Number** LE 627-57

**Commenter Name** Betsy Daub

**Comment** Recommendation:  
The Forest Service must fully analyze the potential negative impacts to communities, employment, and the economies of the area from the loss of the federal lands and this project. It must evaluate the region's reliance on environmental amenities such as tourism and recreation. This assessment should include the potential impacts from scenarios that include water contamination that could extend into the watershed. The nonfederal lands must be analyzed for the socioeconomic benefits (e.g. tourism, recreation, hunting, fishing, traditional gathering) they may bring. A comparison of the socioeconomic values of the federal and nonfederal lands should be provided. And the Forest Service should examine how this exchange helps it meet its Forest Plan Goal of contributing to local, regional, and national economies by providing natural resources in a socially and environmentally acceptable manner.

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**Comment Number** LE 647-2

**Commenter Name** Linda Kofstad

**Comment** The only benefit I can think of is a relatively small number of mining jobs. And those would be offset by loss of tourist industry jobs, very important in the entire Arrowhead area.

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**Comment Number** LE 671-2

**Commenter Name** Steve Vincent

**Comment** For the citizens of Minnesota it will open the gates for a significant number of new jobs during construction of the mine, permanent, high paying jobs in the mine, additional commercial opportunities in surrounding communities, and substantial new tax and royalty income for the state.

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**Comment Number** LE 677-1

**Commenter Name** David Hohle

**Comment** This is part of a treasured tourist area, and I doubt the local economic job gains of a relative few years will offset a future generation of clean-up and years of natural restoration.

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## SOC      Socio-economic Impacts

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**Comment Number** LE 684-1

**Commenter Name** Charles Ellis

**Comment** We often hear the rationale behind approving both the landswap and the introduction of hard rock mining as a choice between jobs and the environment.

I want to see folks on the Iron Range in good jobs because without good jobs a community cannot long survive. Good jobs, however, in a cyclical industry, boom and bust economics, has, time and again, sent Iron Range communities into desperate times.

Polymet and the others who want to introduce hard rock mining to Minnesota will not break this cycle. In addition to another ride on the good times/bad times roller coaster, this industry has a method guaranteed to produce substantial environmental damage.

The combination of cyclical jobs and drastic environmental damage is good for neither the communities on the Range nor the wetlands, forests and wildlife put at permanent peril.

Let's put all the energy into finding good jobs, clean jobs, green jobs, jobs that can be passed down from mother to daughter, father to son. Let's create a legacy of long term employment and conservation of the beauty and wildness we all love.

We can do that. Let's get started.

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**Comment Number** LE 685-1

**Commenter Name** Lyn Clark Pegg

**Comment** This is not sustainable development and therefore the promised jobs are not sustainable. Our region needs to move beyond the short-term profits of mining and extraction and toward eco-friendly, green and clean industries. We can do better than this proposal!

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**Comment Number** LE 689-2

**Commenter Name** Jeff Hazen

**Comment** In addition, an infusion of mining operations chases away other viable industries and the jobs they create, i.e. tourism and high-tech, high-paying industries drawn to Minnesota by a quality work force and an attractive land in which to live and play. Potential super-fund environmental clean-up sites and acid water aren't much of a draw.

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**Comment Number** LE 699-3

**Commenter Name** Barry W. Tungseth

**Comment** I have another problem that concerns the "job issue" of economics up here in the Ely area. PolyMet itself explains that there may be 400 or more jobs available to fill once the mine is in operation. This, by their own explanation, will last about 20 years. For such a SHORT TERM gain, we allow this kind of destruction of public lands?

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## SOO Statement of Opinion

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**Comment Number** LE 001-1

**Commenter Name** Larry Adams

**Comment** The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest.

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**Comment Number** LE 006-1

**Commenter Name** Janet Asanchev

**Comment** The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest.

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**Comment Number** LE 009-1

**Commenter Name** Wanda Ballentine

**Comment** I would like to express my strong objections to the proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project.

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**Comment Number** LE 009-8

**Commenter Name** Wanda Ballentine

**Comment** We, the People, are sick and tired of our public lands, our national heritage, being handed over to private corporations, which have destroyed so much - we hear constant warnings as to how egregiously we have overtaxed our natural resources. The corporations make a lot of money and leave, and we are left with devastation. They all promise "restoration," but corporations can't duplicate Mother Nature, and the results of their attempts have been ghastly in most places.

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**Comment Number** LE 012-1

**Commenter Name** Andrew Bell

**Comment** Please stop the mining process.

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**Comment Number** LE 021-1

**Commenter Name** Chip Borkenhagen

**Comment** Along with the views stated below, I would request you to consider the "best for all", and help us protect our national treasure over the protection of corporate and short-term interests. Now is no time to cave in to special interests like PolyMet. I ask you to do the right thing - for our great grandchildren.

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## SOO Statement of Opinion

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**Comment Number** LE 026-1

**Commenter Name** Richard Brown

**Comment** There are few areas in the US that are true wilderness. Exceptions are ANWAR in Alaska(which is partially in constant political jeopardy) and some other places there. Some wilderness areas in the lower US are somewhat compromised and often in danger of becoming compromised. The BWCAW is greatly used by thousands of people every year and is therefore compromised to the extent by human traffic and threats of nearby development. Silfide mining would be one of these. But much of Minnesota's wild lands that are not actual "wilderness" are too often in jeopardy of environmental degradation, such as our national, state and county forests, prairies and refuges; also many private lands.

With our seeminly unreversable population growth and our diminishing abundance and diversity of native species (flora & fauna) I believe we need to hold the line on developing environmentally sensitive and wild areas, especially with highly toxic material. Therefore, unproven safety methods of development such as sulfide mining should not be allowed and a land swap cannot improve the situation.

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**Comment Number** LE 033-1

**Commenter Name** Julie Champlin

**Comment** I am appalled at this idea and do not understand why we should risk losing any of this pristine landand water, our beloved northern Minnesota. I do not understand how we can trade off 20 years of mining to suffer up to 2000 years in pollution! this will also affect our ecotourism industry where people retreat to enjoy the beauty of nature.

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**Comment Number** LE 041-1

**Commenter Name** Deborah Crocker

**Comment** I am 100% against this swap. This is our land to keep!!! It is not our responsibility to help out some greedy, polluting corp!!!!!! The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest.

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**Comment Number** LE 052-1

**Commenter Name** William Dustin

**Comment** The euphemistically named Superior National Forest Land Adjustment Act is antithetical to the preservation of the Boundary Waters as a wilderness area which was established for the enjoyment of present and future generations.

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## SOO Statement of Opinion

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**Comment Number** LE 052-2

**Commenter Name** William Dustin

**Comment** Sulfide mining on the boundary of this area will destroy its wilderness character. Consequently the issue of property rights must be given the most serious consideration when evaluating this land transfer. The Superior National Forest and the Boundary Waters were established for the enjoyment of all U.S citizens and they are supported and maintained by the taxpayers. The proposed land transfer is not simply a transfer of land; it is a transfer that will radically change the character of the land and how it is used. It also involves giving away a non-renewable resource, the use of which has a permanent and adverse impact on the other resource values the area provides. Therefore, how are present and future citizens to be compensated for a private, foreign corporation's use of this non-renewable resource? How are they to be compensated for the lost opportunities that the mining of these minerals necessarily entails? And how are they to be compensated for the inevitable pollution and other negative externalities associated with sulfide mining? Because of all these adverse impacts, this is not a land transfer of equal value. The acreage may be equal, but that is all. A fair evaluation of the transfer must consider all the costs involved, and many of these costs cannot be evaluated in the simplistic monetary terms of cost-benefit analysis.

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**Comment Number** LE 053-2

**Commenter Name** Jeff Kopp

**Comment** I am in favor of this land exchange and are excited that the tax payers of MN are getting a good deal...here are a few of my questions and thanks in advance for the reply.

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**Comment Number** LE 057-1

**Commenter Name** Joan Ellison

**Comment** I am aware of no mining of this type that has been conducted without massive environmental damage. I don't feel the The Superior National Forest is a suitable testing laboratory.  
Thank you for your time.

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**Comment Number** LE 058-1

**Commenter Name** Jonathan Engel

**Comment** The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest, nor in my family's interest. My family owns land and has a treasured family cabin on the Kawishawi River just a few miles from the proposed mine site. The noise pollution alone from just the test mining over the past years has been bad enough, but with the opening of full scale mining we stand to see irreparable harm come to this fragile wilderness. Please consider the long term impact of this mining. Once the sulfide genie is out of the bottle, there will be no way to halt the damage that case after case around the world has shown will occur to the water and wildlife. While the area needs jobs, I think the addition of a few hundred mining jobs for a decade or two will come at the cost of the many jobs fostered by the BWCAW and surrounding wilderness for generations.

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**Comment Number** LE 062-1

**Commenter Name** Madelynn Frazier

**Comment** Don't let PolyMet swap "generic" land for high quality Superior National Forest land!! They could end up polluting the entire National Forest with their runoff and do irreparable damage to protected wildlife and wetlands. They have to be STOPPED from doing this!!

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## SOO Statement of Opinion

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**Comment Number** LE 063-2

**Commenter Name** Kristin Larsen

**Comment** The cumulative impact of multiple mines and the area being used as a central processing facility for these mines is a fact that the forest service and Army Corps seems to be shutting its eyes and ears to. You are more than the handmaidens of politicians, you are entrusted by the people of the nation – over time and distance – to protect our lands and waters. If not you who?

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**Comment Number** LE 063-7

**Commenter Name** Kristin Larsen

**Comment** All those living downstream and who drink from the underground waters will be impacted by this decision – the harm will take place over years and over many miles – the impact will be felt by those now living and with treaty rights which will be violated by this exchange and by those yet unborn who have no voice now. We must speak for those who are not able to speak for themselves, and you must take action with not just the current whims of economic and political fancy but with the full weight of the centuries of people who will live with your choice.

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**Comment Number** LE 063-9

**Commenter Name** Kristin Larsen

**Comment** How do you weigh the value of it? Political expediency and some jobs during a time of economic panic weigh against centuries of toxic waste. How much would you pay for your child to have a little more cognitive ability or a healthier nervous system? How much would our society pay for a little bit smarter and more capable next generation? Doing this land exchange opens the door to the proposed mining that will spew sulfuric acid and its accompanying contaminants and biological changes into our waters – pretending you can separate the exchange from the fact that this is the planned use is, unfortunately, a lie.

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**Comment Number** LE 063-11

**Commenter Name** Kristin Larsen

**Comment** I ask that the lands not be transferred or exchanged and that the US Forest Service and the Army Corps of Engineers stand for the highest use of this land, that the protections that bind the lands be held fast to and that the Forest Service and Army Corps adhere to its most important duty – to protect for our nation the forests and waters of our nation.

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**Comment Number** LE 066-1

**Commenter Name** Grant Gravidahl

**Comment** This is CRUCIAL for our future and present!!!

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**Comment Number** LE 070-1

**Commenter Name** Janice Greenfield

**Comment** The exchange of high-quality federal forest and wetlands to allow PolyMet's open pit mine would result in an enormous benefit to a private corporation and a huge loss to the public, harming natural resources important to Minnesota, the Great Lakes Region, and the entire nation.

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## SOO Statement of Opinion

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**Comment Number** LE 070-3

**Commenter Name** Janice Greenfield

**Comment** After decades of environmental damage, hopefully we have become smart enough to preserve the sanctity & wholeness of our national forest. Please say "No" to Poly-Met's egregious swap proposal. It's based on greed & we know where that gets us -- in the dumpster (environmentally & healthwise.)

I would greatly appreciate your opposing this land swap.

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**Comment Number** LE 090-1

**Commenter Name** Dan Iverson

**Comment** Since you already well aware of the issues surrounding sulfide mining, I will just say that the economic boost these mines give to the local economies of northern Minnesota and the state as a whole will be small compensation for the long term impacts of this type of mining. Water is becoming the most precious resource on earth and will be the defining criteria for quality of life. This state has the potential to become "the" place to live if we don't gamble it away. The DNR should not be a part of this betrayal of Minnesota's heritage and a party to the unraveling of a pristine and fragile ecosystem. But, money, in the right pockets at the right time usually prevails and the public will unwittingly lose again. Words just don't seem to mean much unless there is money behind them. Too many cowards and not enough hero's.

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**Comment Number** LE 094-1

**Commenter Name** Stephen Jay

**Comment** As a home owner along the S. Kawishiwi River (Endless Waters of Spruce Road, #12309) our family is very concerned about the proposed land exchange.

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**Comment Number** LE 096-1

**Commenter Name** Erik Jensen

**Comment** As an avid sportsmen who enjoys wilderness hunting and angling, I am concerned the proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest.

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**Comment Number** LE 105-1

**Commenter Name** Scot Kindschi

**Comment** NO LAND SWAP!

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**Comment Number** LE 106-1

**Commenter Name** Amy Kireta

**Comment** I believe that the proper precautions are not in place to offer protection of our natural resources with the approval of the Polymet/Northmet project. Furthermore, I have serious reservations about the exchange of public land to move the project forward.

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## SOO Statement of Opinion

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**Comment Number** LE 109-1

**Commenter Name** Barb Knoth

**Comment** DO not even go there. Public lands do not get swapped or messed with. Stop the insanity. Ultimatley do none of you care about clean water? PolyMet needs to go away.

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**Comment Number** LE 125-1

**Commenter Name** Jonathan Lien

**Comment** There is some talk about mining up north in our beautiful, shared wilderness. Supposedly the possibility of short-term jobs is enough to get us so excited we sell out nature. Some have even spoken of weakening the water quality standards to make mining easier and cheaper for the company, and infinitely more expensive for the state. I trust that no one in any position of authority is so shortsighted. We need to strengthen pollution laws, to assure future generations of a beautiful Minnesota. Else, what are we saying? "We want US companies to treat our land and resources with respect, but if you are a foreign company, taking profits from our ground, you may leave behind a horrible, dangerous mess."

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**Comment Number** LE 125-2

**Commenter Name** Jonathan Lien

**Comment** How about this, "No mining in Minnesota until you can guarantee it will not affect our plants, our animals, our air or water, and you cannot leave a mess behind." Even a three-year-old is taught to clean up their mess; I think we should hold foreign companies to the same standard. Wild rice is the iconic Minnesota plant, and thousands of tourists visit the boundary waters for their pristine beauty. We don't want more copper and sulfates in the water; tourists don't visit dead plants and look up to slag heaps. We should not sacrifice beauty, tourism, and historically significant crops just to piss off the Native Americans again, while making foreign millionaires richer.

If we respect our land and our people, we cannot even entertain the possibility of weakening our pollution laws.

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## SOO Statement of Opinion

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**Comment Number** LE 130-1

**Commenter Name** Mary Smith

**Comment** AS A WITNESS TO MUCH OF NORTHERN MN. POOR MANAGEMENT OF "LAND SWAPS" WHICH TEND TO BE ONLY FOR THE ADVANTAGE OF THE BUSINESS INTEREST, I HAVE WITNESSED LOSS OF WETLANDS AND OTHER LANDS THAT ARE VITAL FOR ANIMALS, FILTERING WATER TO LARGER BODIES OF WATER AND NATURE AS WELL AS TO THE PEOPLE.

YOU CANNOT ACTUALLY REPLACE A WETLAND. THEY TAKE CENTURIES TO BUILD. THIS IS A HUGE HUGE HUGE HUGE HUGE HUGE MISTAKE TO ALLOW THE NATIONAL FOREST TO BE PILLAGED AND USED BY POLYMET.

POLY-MET. TAKE A LOOK ALONE AT THE NAME.

THERE IS NO ONE TO WATCH OVER THE MOST LIKELY DEVASTATION THAT WILL OCCUR. NO IMPARTIAL OR QUALIFIED PARTY.

AGAIN. YOU CANNOT REPLACE THIS LAND. THERE IS NO SUCH THING AS "SWAPPING" IN A CASE LIKE THIS. THIS IS A HUGE MISTAKE!!!!!!!!!!!!!!!!!!!!!!

MY MOTHER IN LAW AND SISTER IN LAW, WORKED FOR BOTH THE DNR AND ALSO NATURE CONSERVANCY. MY OTHER SISTER IN LAW WORKED WITH TRIBAL LANDS. WE UNDERSTAND THE NECESSITY OF KEEPING THIS PLACE AS IT IS...SACRED.

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**Comment Number** LE 130-2

**Commenter Name** Mary Smith

**Comment** YOU CANNOT ACTUALLY REPLACE A WETLAND. THEY TAKE CENTURIES TO BUILD. THIS IS A HUGE HUGE HUGE HUGE HUGE HUGE MISTAKE TO ALLOW THE NATIONAL FOREST TO BE PILLAGED AND USED BY POLYMET.

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**Comment Number** LE 130-3

**Commenter Name** Mary Smith

**Comment** POLY-MET. TAKE A LOOK ALONE AT THE NAME.

THERE IS NO ONE TO WATCH OVER THE MOST LIKELY DEVASTATION THAT WILL OCCUR. NO IMPARTIAL OR QUALIFIED PARTY.

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**Comment Number** LE 130-4

**Commenter Name** Mary Smith

**Comment** AGAIN. YOU CANNOT REPLACE THIS LAND. THERE IS NO SUCH THING AS "SWAPPING" IN A CASE LIKE THIS. THIS IS A HUGE MISTAKE!!!!!!!!!!!!!!!!!!!!!!

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**Comment Number** LE 130-5

**Commenter Name** Mary Smith

**Comment** MY MOTHER IN LAW AND SISTER IN LAW, WORKED FOR BOTH THE DNR AND ALSO NATURE CONSERVANCY. MY OTHER SISTER IN LAW WORKED WITH TRIBAL LANDS. WE UNDERSTAND THE NECESSITY OF KEEPING THIS PLACE AS IT IS...SACRED.

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## SOO Statement of Opinion

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**Comment Number** LE 143-1

**Commenter Name** Daniel Messinger

**Comment** The land swap is an awful idea! My wife and I will cease our annual trip to the Boundary Waters should mining at its borders occur.

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**Comment Number** LE 148-5

**Commenter Name** Margot Monson

**Comment** The proposed Land Exchange for the PolyMet project will not serve our overall public interest. It will only benefit the PolyMet Corporation and for a relatively short period.

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**Comment Number** LE 148-6

**Commenter Name** Margot Monson

**Comment** I ask for your thoughtful consideration of the serious impacts the PolyMet open pit sulfide project will have on the Superior National Forest and to vote against the proposed Land Exchange.

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**Comment Number** LE 151-3

**Commenter Name** Linda Morris

**Comment** Please do not allow PolyMet to pollute our lands for their profit. Minnesotans are proud of our natural resources.

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**Comment Number** LE 154-1

**Commenter Name** Michael Smith

**Comment** The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest. It is not in my interest, as one who has volunteered in the SNF. Leave it alone.

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**Comment Number** LE 170-1

**Commenter Name** Elanne Palcich

**Comment** The USFS has made a grave error. According to the Weeks Act, this surface land should not be sold, outright or via a land exchange, to a foreign mining company. Instead that company must confine its mining to underground operations.

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**Comment Number** LE 170-3

**Commenter Name** Elanne Palcich

**Comment** This is the 3d egregious effort to facilitate PolyMet's proposal to mine within Superior National Forest. It is equally evasive of the law, and equally lacking in merit.

This is a very ill-boding beginning for the opening of a sulfide mining district that threatens to contaminate our watersheds for centuries.

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## SOO Statement of Opinion

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**Comment Number** LE 170-4

**Commenter Name** Elanne Palcich

**Comment** This land exchange process has its own labyrinth of betrayals to the public. This begins with the USFS being remiss in preparing a Hardrock Minerals Prospecting Permit Project EIS. The DEIS is just now being prepared. Then, even with this process finally in progress, the USFS has just ended comment periods for two additional prospecting applications (Encampment's Serpentine and Skibo deposits), considered individually in order to ignore cumulative effects, and considered as separate from the Hardrock DEIS which is supposed to be all inclusive of mining exploration impacts on Superior National Forest.

To further complicate matters, the USFS suspended preparation of the Hardrock DEIS by soliciting then U.S. Representative James Oberstar, along with U.S. Senator Amy Klobuchar and then U.S. Senator Norm Coleman, to introduce special legislation that would require the sale of 6,700 acres of USFS land to PolyMet (Superior National Forest Land Adjustment Act of 2007). Public pressure put an end to this endeavor.

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**Comment Number** LE 170-5

**Commenter Name** Elanne Palcich

**Comment** Evidently, the USFS is unaware of the divisive nature of the proposed opening of a sulfide mining district in the Arrowhead Region. There are many citizens—local, state, and national—who use and value the Boundary Waters Canoe Area Wilderness, and the federal forests and wetlands that buffer the BWCAW, and extend to Lake Superior. There are also Tribal members, hunters, and fishermen who oppose the loss of federal lands.

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**Comment Number** LE 170-6

**Commenter Name** Elanne Palcich

**Comment** Evidently, the USFS is unaware of the scope of this projected sulfide mining district, which is projected as a 5 billion ton mineral deposit. The ores within this deposit contain disseminated, low grade metals, meaning that 99% of the excavated material would be waste rock. This extracted waste rock and tailings would greatly disfigure the land, while acid mine drainage and toxic heavy metals would leach into the watersheds, requiring perpetual treatment. The vastness of this proposal would decimate wildlife, and would leave behind a wasteland unsuitable for future use. It would mean the demise of endangered or threatened species, including the lynx, and rapidly dwindling moose population, and loss of habitat for birds and migrating bird populations.

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**Comment Number** LE 170-7

**Commenter Name** Elanne Palcich

**Comment** Facilitating PolyMet is facilitating the opening of a sulfide mining district. Once Superior National Forest becomes parceled out, contaminated, and denuded, there will be nothing of value left to protect.

The PolyMet operation alone would involve the single largest loss of wetlands in the ACOE history in Minnesota. This includes the 100 Mile Swamp, designated as an ARNI. Loss of such a large area of wetlands means the loss of carbon sequestration ability, while the industry itself uses large amounts of carbon emitting electricity, fuels, and equipment.

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## SOO Statement of Opinion

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**Comment Number** LE 170-9

**Commenter Name** Elanne Palcich

**Comment** In northeastern Minnesota, law has been circumvented in order to facilitate mining. However, the vastness of opening up a sulfide mining district goes beyond imagination. The USFS is circumventing its responsibility to the public and to the management of public lands for the highest benefit for present and future generations.

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**Comment Number** LE 170-10

**Commenter Name** Elanne Palcich

**Comment** Tax payer money is being used to prepare a land exchange process that cheats the public out of land that has been preserved in its wilderness character. This kind of land exchange is what happened with the Native Americans about a century ago, totally demolishing their culture, decimating the white pine forests, and creating a pocketed Iron Range—full of open pits and underground tunnels. On a statewide level, the Arrowhead is all that remains of essentially undisturbed wetlands and boreal forest. Now the USFS is willing to trade that land to foreign/multi-national mining companies.

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**Comment Number** LE 170-11

**Commenter Name** Elanne Palcich

**Comment** Tax payer money being used to prepare a faulty land exchange process should be used instead to inventory the true value of this land and its natural resources—clean air and water, wildlife, biodiversity, and sustainability—land that will support all life, including humans.

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**Comment Number** LE 170-12

**Commenter Name** Elanne Palcich

**Comment** The superficial quality of this land exchange process is not an asset to a PolyMet DEIS that already lacks credibility. The USFS can take a stand now, or stand judged later. History is made in the present moment.

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**Comment Number** LE 175-1

**Commenter Name** Unknown

**Comment** I oppose the exchange of any land for the Poly-met proposal.  
We do not need additional polluters fouling waters of northern Minnesota.

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**Comment Number** LE 183-1

**Commenter Name** Marlise Riffel

**Comment** I oppose the proposed land exchange for the Polymet Northmet mine. Here's the analogy that comes to mind: you give your two children each a \$5 bill, but you tell your son not to spend it on candy. You forget to tell your daughter that stipulation. Your son, wanting the candy, trades his \$5 for his sister's \$5 so that he can spend the "unrestricted" money on candy. I'm sure you would be unhappy if you were the parent. It's tricky and dishonest. And that's what I smell happening here.

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**Comment Number** LE 183-2

**Commenter Name** Marlise Riffel

**Comment** The exchange will benefit a private corporation and will lose resources for the public. I'm part of the public.

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## SOO Statement of Opinion

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**Comment Number** LE 193-1

**Commenter Name** Linda Rulison

**Comment** no sulfide mining should be done in the Lake Superior Watershed , especially an open pit mine.

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**Comment Number** LE 202-1

**Commenter Name** Rachel Scott

**Comment** The proposed Land Exchange for the PolyMet NorthMet open pit sulfide mine project that would affect 6,650 acres of the Superior National Forest is not in the public interest.

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**Comment Number** LE 202-2

**Commenter Name** Rachel Scott

**Comment** I agree with the comments submitted by the Water Legacy. I live in Minnesota because I enjoy the opportunities to explore vast preserved natural woodlands and wetlands, and lakes of the area.

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**Comment Number** LE 202-3

**Commenter Name** Rachel Scott

**Comment** Further, Minnesota depends heavily on tourism, which would be adversely affected by mining operations which poison the habitat which supports our varied and interesting wildlife, from the loons, ducks and other species which inhabit the wetlands, to the fish in the pristine streams, where anglers spend countless hours fishing for trout. The beaver, otter, bears, moose, foxes and wolves will suffer adverse effects from poisoned land and waterways.

This is a deal with the devil Short term profits, short-lived jobs, in exchange for which we will be left with the legacy of irreparable harm to our natural forestlands.

Of course, where ever man encroaches we leave behind destruction in our wake, in the name of "progress." Why should this despoilation of our natural heritage be spared the fate that has befallen so many mining areas? Unless, finally, we have learned from our mistakes, and factor in the costs of quality of life for Minnesotans, for visitors, and for the flora and fauna of our National Forests, wetlands, and fresh water reserves.

Only one percent of the water on earth is available for human use. Lake Superior is the largest source of fresh water in the world. Is the water quality of Lake Superior of so little importance that we would trade away the tributaries which would be polluted by PolyMet mining, and subsequently empty into Lake Superior, degrading this valuable and unique resource?

---

**Comment Number** LE 202-4

**Commenter Name** Rachel Scott

**Comment** I oppose the plan to swap lands, allowing PolyMet to trade non-critical land for lands which are vital to the health of Minnesota's National Forest wetlands and Lake Superior itself. This is our heritage--our future; it belongs to all Minnesotans and to all Americans--you cannot trade it away to profit a private company, when our return, our legacy will be one of despoiled lands, which may take hundreds of years, if ever, to recover. What else would we gain? A limited number of jobs, for a limited period of time, until the mining value of the land is no longer viable.

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## SOO Statement of Opinion

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**Comment Number** LE 202-5

**Commenter Name** Rachel Scott

**Comment** It is time to take stewardship of our public lands seriously, and to preserve them for their own value, for eco-structure which supports the current balance of nature, to protect Lake Superior, and to continue to make these federal lands available for the public's enjoyment. We have so few natural areas left. The ones which remain become, as a result, all the more critical, as they are the last preserves for our wild creatures.

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**Comment Number** LE 206-1

**Commenter Name** John Smith

**Comment** We must stand firm in our values. I don't want to send my children and future generations the message that Minnesota values pollution over health and immediate \$\$\$ over long term \$\$\$ in sustainable industry. It's time to move on from PolyMet. NO LAND SWAP. not now, not ever.

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**Comment Number** LE 214-1

**Commenter Name** Zabelle Stodola

**Comment** I am co-owner of property in the Superior National Forest at 46 Gust Lake Drive in Lutsen, Minnesota. I write to express my strong opposition to the potential land swap between the USDA Forest Service and Polymet Mining. The materials mailed to my husband and me dated 12 October 2010 suggest that the USDA is adopting the perspective and orientation of PolyMet (which isn't even an American company) to circumvent environmental safeguards within the USA.

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**Comment Number** LE 214-3

**Commenter Name** Zabelle Stodola

**Comment** I do not want to see metallic sulfide mining in Minnesota's northwoods. And trying to placate the public by proposing a land swap in return for allowing an open pit mine is unconscionable. Your letter would appear to be connected to a special favors bill that would require the US Forest Service to sell 6,700 acres of public land to PolyMet. Special favors legislation would circumvent the current legal process and would undermine the authority of the EPA, as well as the US Forest Service. What is the USFS thinking of?

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**Comment Number** LE 224-1

**Commenter Name** Marcia Thurmer

**Comment** P.S. Time to start re-using the wastage dumped on earth's surface, not digging up more from under our skin.

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**Comment Number** LE 228-2

**Commenter Name** Andrew and Elizabeth Urban

**Comment** There have been too many cases of treaties and agreements broken in the name of "economic development". Let us not make this just one more case where citizens cannot trust their government agencies to do what is ethically right.

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## SOO Statement of Opinion

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**Comment Number** LE 247-1

**Commenter Name** Kristen Zehner

**Comment** The USA is already on auction for private corporate profit--American citizens deserve protection from profiteers merely to enhance human habitat if nothing else.

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**Comment Number** LE 249-8

**Commenter Name** Darren Vogt

**Comment** Finally, we remind you of the trust responsibility and government-to-government relationship required of federal agencies, including consultation under Section 106 of the National Historic Preservation Act. The bands look forward to further developing this consultation as the process for the Supplemental Environmental Impact Statement moves forward.

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**Comment Number** LE 250-1

**Commenter Name** T.E. Alget

**Comment** Thank you for the opportunity to provide my support for the environmental review of the land exchange between PolyMet Mining Corporation and the United States Forest Service.

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**Comment Number** LE 250-3

**Commenter Name** T.E. Alget

**Comment** Equally important, however, is protecting the natural resources that also are a part of why people choose to live and work in this region.

The land exchange supports both.

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**Comment Number** LE 256-1

**Commenter Name** Bill Brice

**Comment** It appear that the parties have done a good job matching the lands the FS is receiving with the types of lands the are giving up.

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**Comment Number** LE 260-3

**Commenter Name** Mike Schelmeske

**Comment** A hunter-gatherer who wants harvest to be clean

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**Comment Number** LE 260-4

**Commenter Name** Mike Schelmeske

**Comment** Wants FS to hold company's feet to the fire and enforce environmental constraints

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**Comment Number** LE 266-1

**Commenter Name** Janet Draper

**Comment** I am writing to oppose the proposed land exchange in the Superior National Forest, which would convert 6,650 acres of federal land from public to private ownership. This would remove the environmental review and protections from this area of over 1000 acres of high quality wetlands and thousands of acres of forest.

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## SOO Statement of Opinion

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**Comment Number** LE 266-4

**Commenter Name** Janet Draper

**Comment** I am very concerned about the future of our water quality in Minnesota. Thank you for considering my plea.

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**Comment Number** LE 268-1

**Commenter Name** Gregory Elstad

**Comment** It looks to me as if you folks have put together an excellent land exchange proposal. I am in favor of your proposal and hope you can make it happen.

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**Comment Number** LE 268-2

**Commenter Name** Gregory Elstad

**Comment** I am also in favor of the Polymet project. Minnesota needs the additional 400 jobs (I think that is the rite #?) and the United States needs the copper. Copper is a strategic mineral; for national csecurity reasons we need to produce in our own country the copper we need. We should NOT rely on foreign countries to supply our strategic minerals if it is possible to do so ourselves.

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**Comment Number** LE 273-1

**Commenter Name** Erik Erie

**Comment** As a resident of nearby Hoyt Lakes and an outdoor enthusiast, the proposed NorthMet Mining Project directly effects me and my family. I support the efforts of Polymet and others to responsibly use our natural resources for the mining projects. I believe they have done their due diligence in providing the public and regulatory agencies with the information needed to proceed with the project.

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**Comment Number** LE 274-1

**Commenter Name** Joel Evers

**Comment** I understand and support the proposed land exchange in the draft SDEIS that I received from Mark Hummel on or about mid-October, 2010.

It is time the citizens of St. Louis County, the State of Minnesota and the United States of America move off top dead center and throw their support behind non-ferrous mining. There is a limit to how much the regulating agencies can do from their agency offices and behind computers. Now it is time to trust in the experienced staff of PoluMet Mining, Inc and let them commence mining and processing low grade copper nickle ore from the Duluth Gabbro Complex. Some of the current staff were colleagues of mine, Minnesota educated and residents of the Gopher state. I trust that their intent, simply put, is not to intentionally poison the air and water that they, their families and friends breathe and drink. They will be compensated for rigerously complying with their job description. In my career I never reviewed a job description that was written to reward non-compliance with good environmental stewardship.

I am of the opionion that good compliance with law, regulation and rules is only as good as the enforcement process that goes with it. The enforcement process should be civil, positice and constructive for it to be effective.

Based on 30 years of experience in Open Pit Mining Operations in the East Mesabi Iron Range and participation in meetings between the State, Federal mining and environmental regulatories agencies, I recommend the following. The SNF, U.S. Forest Service, USACE, MnDNR, NEPA and MEPA approve the final SDEIS and the EIS expeditiously then move forward in permitting the NorthMet Project.

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## SOO Statement of Opinion

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**Comment Number** LE 280-1

**Commenter Name** Esteban Chiriboga

**Comment** The purpose of this letter is to communicate a broad set of issues that should be analyzed in detail within the NEPA process.

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**Comment Number** LE 282-1

**Commenter Name** Paula Maccabee

**Comment** In these comments, WaterLegacy identifies analysis that must be completed in the supplemental draft environmental impact statement (SDEIS) for the PolyMet Land Exchange to comply with applicable law and provide an adequate factual record. WaterLegacy submits that, if the SDEIS were prepared with rigor and in compliance with law, it would demonstrate that the proposed PolyMet Land Exchange does not meet the requirements of applicable federal statutes and rules, conflicts with the applicable Forest Plan, is contrary to the public interest and would cause irreparable and irretrievable harm to the natural environment.

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**Comment Number** LE 282-77

**Commenter Name** Paula Maccabee

**Comment** We request that the Forest Service follow the requirements of applicable law and reject the proposed PolyMet Land Exchange.

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**Comment Number** LE 302-5

**Commenter Name** Kevin Proescholdt

**Comment** 4. Long-term Environmental, Cultural, and Economic Impacts - Should the exchange take place, it would enable the development of a mine that the U.S. Environmental Protection Agency (EPA) has found to be one of the poorest planned projects it has reviewed. The EPA ranked this project as Environmentally Unsatisfactory, Inadequate, a rating given less than one percent of the time on projects of this type. It is a failing grade.

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**Comment Number** LE 305-5

**Commenter Name** Maureen Johnson

**Comment** The land belongs to the people of the United States and to the Native American Nations, regardless of the method of acquisition. It was hard won by the both and I appreciate that SNF is making an effort to avoid a wanton exchange.

---

**Comment Number** LE 307-1

**Commenter Name** Loni Kemp

**Comment** I oppose the Land Exchange for the PolyMet NorthMet open pit sulfide mine project affecting 6,650 acres of the Superior National Forest. The public interest is better served by preserving our forests and not enabling toxic mining.

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**Comment Number** LE 307-2

**Commenter Name** Loni Kemp

**Comment** While the exchange would enrich a private corporation, it would be a loss to the public, harming natural resources important to Minnesota and the entire nation.

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## SOO Statement of Opinion

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**Comment Number** LE 307-5

**Commenter Name** Loni Kemp

**Comment** Please reject the PolyMet Land Exchange. Thank you for considering my views.

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**Comment Number** LE 308-1

**Commenter Name** Karl Kendall

**Comment** We should do everything possible to expedite this exchange in order to get this mining operation up and running

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**Comment Number** LE 310-1

**Commenter Name** Mark Larson

**Comment** I think property consolidation is a good thing. It will save money on management and travel costs.

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**Comment Number** LE 310-2

**Commenter Name** Mark Larson

**Comment** I am also for the new mine and the jobs it will provide if the PCA can work out the save water disposal to protect our water shed.

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**Comment Number** LE 311-1

**Commenter Name** Ernest Lehmann

**Comment** Beaver Bay Inc. (BBI), a partner with Franconia Minerals (USA) Inc. in the Birch Lake Joint Venture, a venture that is actively exploring its copper-nickel-platinum group metals deposits in the St. Louis and Lake Counties Minnesota, is pleased to have this opportunity to comment in favor of the early and favorable completion of the land exchange and the SDEIS on the above captioned matter.

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**Comment Number** LE 312-4

**Commenter Name** Peter Leschak

**Comment** The land exchange would amount to a sacrifice of public resources for private gain that threatens the health and welfare of water resources, wetlands, forest, wildlife, and humans. Such is not the purpose of the Forest Service.

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**Comment Number** LE 313-1

**Commenter Name** Robert Maki

**Comment** I'm in favor of the NorthMet Mining Project and the land exchange as proposed. Obviously a private citizen can't be knowledgeable about much of the proposed land considered for exchange but I trust the qualified federal and state officials involved to make sound decisions.

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**Comment Number** LE 314-1

**Commenter Name** Justin Mattson

**Comment** The land exchange will be beneficial for both local industry and the forest service.

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## SOO Statement of Opinion

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**Comment Number** LE 314-2

**Commenter Name** Justin Mattson

**Comment** The current federal lands border a former heavy industrial site whereas the lands exchanged will buffer current forest tracts as well as add multiple sensitive areas to federal protection.

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**Comment Number** LE 314-3

**Commenter Name** Justin Mattson

**Comment** The land exchange appears to be in the best interest of all parties involved.

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**Comment Number** LE 324-3

**Commenter Name** Daniel Mundt

**Comment** Anyone who really understands the matters of nature and life know that water is the most essential element.

If a mistake is made and the water supply is contaminated, it is not just human beings that are affected, but all of the other matters of environment. You can see this clearly by what salt on roads does to trees when it destroys them in many instances because of too much salt being put on the highway. You can see it when water is polluted, animals drink it, and all of a sudden they are diseased or die.

Having said the above, I have some relatively strong feelings that your record and the record of the Superior National Forest is one of trying to protect the land and the environment.

---

**Comment Number** LE 327-1

**Commenter Name** Rachel Nelson

**Comment** I give thanks for the tourism industry outdoors in my part of the state!

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**Comment Number** LE 329-2

**Commenter Name** Ken Norenberg

**Comment** Economic issues aside, the questions of national security, long-term, should trump any and all possible objections.

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**Comment Number** LE 329-3

**Commenter Name** Ken Norenberg

**Comment** Reasonable sportsmen will find ways to surmount any perceived restrictions and/or obstacles.

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**Comment Number** LE 330-2

**Commenter Name** Gerald Olsen

**Comment** The land exchange proposed looks to be acceptable.

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## SOO Statement of Opinion

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**Comment Number** LE 330-4

**Commenter Name** Gerald Olsen

**Comment** The next item is the despotition of mineral rights. If these items are done in a fair and acceptable matter, do it. It seems the Lake County exchange got things started, get it done and don't talk it to death or get bogged down in red tape. It is still interesting what or who had an attitude change about land exchange.

---

**Comment Number** LE 330-5

**Commenter Name** Gerald Olsen

**Comment** If these items are done in a fair and acceptable matter, do it. It seems the Lake County exchange got things started, get it done and don't talk it to death or get bogged down in red tape. It is still interesting what or who had an attitude change about land exchange.

---

**Comment Number** LE 335-1

**Commenter Name** Jean Public

**Comment** i object to any land exchange of forest service land with this profiteer. forest service land was saved by the us public for the good of their children and not to be destroyed like this plan does. this land should not be trifled with and should remain forest service land.

usace cant be trusted to work for the good of the american people. usace works for business, only for business. this agency doesnt care what environmental havoc they create. have you ever heard of xanadu in nj - they allowed that horror to be built in a terribly overcrowded area and it is stil lnot occupied. it was not needed. usace is ugly agency. usace was the engineer for the dykes in new orleans that failed and killed people. dont think you are getting top quality work when you call in this agency. this part of the army should be disbanded. they are anti environmental in the worst sense. all they care about is business and money!

i oppose any discharge of fill into us waters. we already know usace will issue a permit for this. they work for destruction of earth.

i oppose the land exchange. the american people do not believe this is a benefit to them at all. is there some under the table bribing going on here that can be investigated by calling in the inspector general and the gao? it might be a good idea to do this.

btw, who wants to recreate by an open pit mine? are you crazed to even suggest that? a mine drives away recreatoinists.

---

**Comment Number** LE 335-3

**Commenter Name** Jean Public

**Comment** i oppose the land exchange. the american people do not believe this is a benefit to them at all. is there some under the table bribing going on here that can be investigated by calling in the inspector general and the gao? it might be a good idea to do this.

btw, who wants to recreate by an open pit mine? are you crazed to even suggest that? a mine drives away recreatoinists.

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## SOO Statement of Opinion

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**Comment Number** LE 338-1

**Commenter Name** Charles F. Prokop

**Comment** I write to object to the 5 tract, 6773 acres land exchange that Polymet Corp. wishes to make in order to dig the first copper mine in Minnesota.

I am vice president of the MN Trout Ass'n and have and still am on the Trout and Salmon subcommittee of the DNR budgetary oversight committee. I fish in a number of areas in Minnesota and am very deeply concerned about this proposal. It should not be permitted. Let me share some history on pollutions in Minnesota and in other states also.

---

**Comment Number** LE 338-3

**Commenter Name** Charles F. Prokop

**Comment** but the dangers to the existing environment are, I think, obvious and even though there is capital investment and Jobs projected, it is better to say "Not Permitted". Making the proposed land exchange is not a good. It is a bad choice.

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**Comment Number** LE 340-1

**Commenter Name** John Reed

**Comment** I am opposed to this exchange unless PolyMet can compensate taxpayers with higher quality exchange-land and greater land-area to compensate for the harm which will be caused the the open pit mining.

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**Comment Number** LE 341-1

**Commenter Name** Jon Rich

**Comment** Minnesota needs to save one of its crown jewels-the BWCA which consists of a large continuous of wilderness lakes, forests, and rivers and also called the Quetico Superior country. This area has prehistoric pictographs and petroglyphs and is the historic homeland to the Ojibwe.

This BWCA is one of the top Minnesota tourist attractions. People come from all over the world to experience a vacation in such a beautiful wilderness area where they are free of crowds, cell phones, traffic and noise pollution to enjoy the quiet the call of the loons, and wolves, and moose and many water birds songs.

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**Comment Number** LE 341-6

**Commenter Name** Jon Rich

**Comment** This cannot happen. Please helps top this proiect now.

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**Comment Number** LE 342-1

**Commenter Name** Wendy Robertson/Kurt Wetzel

**Comment** We believe that this land trade is not in the public's interest for the following reasons:

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## SOO Statement of Opinion

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**Comment Number** LE 343-1

**Commenter Name** Mary Black

**Comment** Cook County does not support the exchange of Tract 5, non-federal land on the west side of McFarland Lake near the Boundary Waters Canoe Area Wilderness (BWCA) in Cook County that is currently owned by Wheaton College. The county is committed to maintaining its tax base and is concerned any time that a privately-held parcel passes into Federal ownership. It is a particular concern in this case as the parcel is located on a very attractive and accessible lake that is suited to some additional modest development.

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**Comment Number** LE 348-1

**Commenter Name** Lolita M Schnitzius

**Comment** I concur with the proposed land exchange to further the proposed mining project. It will benefit our area and its future. Those involved will achieve the appropriate methods to achieve results and be mindful of the environmental aspects.

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**Comment Number** LE 348-3

**Commenter Name** Lolita M Schnitzius

**Comment** Minnesota people are diligent and wish to preserve their home. Families have worked for a century to make this area "home" and that diligence and efforts will make the NorthMet Mining Project go forward and being rewards that will keep people on the land they love and care for.

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**Comment Number** LE 355-1

**Commenter Name** Andrew Seliskar

**Comment** Looks like a good deal for the concerned parties and the public.

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**Comment Number** LE 363-1

**Commenter Name** Robert Stodola

**Comment** I am not in favor of the USFS proposal.

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**Comment Number** LE 363-3

**Commenter Name** Robert Stodola

**Comment** The second reason: you should all, personally, be ashamed of yourselves for allowing a tailings basin to be constructed. This tailings basin will have some of the nastiest chemistry known to man - lithium that's radioactive, copper-arsenic.

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**Comment Number** LE 363-4

**Commenter Name** Robert Stodola

**Comment** I know that none of you have done any diligence into the tailings- what to do with them over time. Be good and be ashamed of yourselves.

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**Comment Number** LE 371-4

**Commenter Name** Anne Stewart Uehling

**Comment** Gained - a more integrated forest

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## SOO Statement of Opinion

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**Comment Number** LE 372-1

**Commenter Name** Julie Viken

**Comment** I am writing to you in opposition of giving a permit to PolyMet Corporation for their plans to mine near Hoyt Lakes, MN.

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**Comment Number** LE 373-1

**Commenter Name** Norm Voorhees

**Comment** The NorthMet mining project and land exchange seems to be a very good idea

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**Comment Number** LE 373-3

**Commenter Name** Norm Voorhees

**Comment** Please expedite this process as soon as possible.

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**Comment Number** LE 381-2

**Commenter Name** Gary Clements

**Comment** The area in question is in a wetland environment, in which it would be even more tricky to contain the resulting acid mine drainage. This land exchange would clearly be in the interest of these foreign corporations, but in the long run, NOT in the interest of the forest, its permanent inhabitants, and the people of Minnesota.

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**Comment Number** LE 395-1

**Commenter Name** Molly Woehrlin

**Comment** I am against the any land exchange between Polymet or any sulfide mine project. I think the surface land rights are more important than what lies underneath.

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**Comment Number** LE 395-4

**Commenter Name** Molly Woehrlin

**Comment** I am strongly opposed to the landswap that would harm our protected Superior National Forest, a national treasure.

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**Comment Number** LE 396-1

**Commenter Name** Margaret Buresh

**Comment** We have already ravaged the earth. We don't have the right to continually destroy it!

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**Comment Number** LE 398-1

**Commenter Name** Janet McTavish

**Comment** I live on the North Shore of Lake Superior. We have worked hard to protect the Lake and the land in Northern Minnesota for the health and wellbeing of future generations. Don't sell us out now!

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## SOO Statement of Opinion

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**Comment Number** LE 399-1

**Commenter Name** Carl Schlueter

**Comment** Plain and simple: mining is dirty, dangerous work that degrades land and devalues life.

Don't do it,

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**Comment Number** LE 400-1

**Commenter Name** Douglass A. Buell

**Comment** I am writing in support of the proposed PolyMet Mining Land Exchange between PolyMet and the US Forest Service. This land exchange will be of benefit to both PolyMet and the Superior National Forest.

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**Comment Number** LE 400-4

**Commenter Name** Douglass A. Buell

**Comment** With proper supervision and oversight by the MNDNR, it will be an ongoing support for this area for many years without creating environmental issues that can not be handled and mitigated.

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**Comment Number** LE 401-1

**Commenter Name** Barbara Kaufman

**Comment** In addition, the amount of toxins that will be released into the environment is unknown. Please let caution and care for our environment be the guide in making an irrevocable decision.

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**Comment Number** LE 402-1

**Commenter Name** Jack Lewis

**Comment** I have a cabin in Northern Minnesota and am well aware of one of the regions proposed for PolyMet mining. I am adamantly opposed to the mine because of the risk to the lakes and wetlands in the area. Land swaps are another term for the Forest Service selling public lands and I oppose these as well. Two land swaps near my cabin have resulted in immediate development of previously public lands; there seems to be no limit on which land can be swapped. Land was assigned to the public in perpetual trust to prevent unbridled development. The land swap process is directly contrary to this trust. The PolyMet mine plans are a perfect example as to why we have public lands. This type of mining should not be allowed until convincing evidence can be presented that the risks are minimal. We don't need a BP-like disaster in the North Woods.

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## SOO Statement of Opinion

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**Comment Number** LE 403-1

**Commenter Name** Holly Peteron

**Comment** The wildlife that we have in Minnesota is unique and beautiful. We have an opportunity to prove that we value this wildlife not only in the abstract, but also when our financial gain opposes its wellbeing. There is no good, long term reason to allow the sale of the wetlands. Please seriously consider, as I'm sure you have, the terrible long-term impacts of allowing this mining to take place. Poisoning of groundwater, destruction of habitats, and more will all result from this action.

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**Comment Number** LE 404-1

**Commenter Name** John & Carol Sayres

**Comment** This type of mining has not been proven safe; please do not allow it!

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**Comment Number** LE 405-3

**Commenter Name** Steven D. Lere

**Comment** What is our greatest resource we have up here in northern Minnesota? Water ,clean clear fresh water. Water that supports life. Now, I 'm not an environmentalist by any stretch of the imagination. I believe that the 300 plus jobs created by building PolyMet is not worth the cost to the land and water it will destroy. I've worked in the mining industry for 32 years and I'm hoping that PolyMet will not go through.

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**Comment Number** LE 405-5

**Commenter Name** Steven D. Lere

**Comment** You may think this sounds paranoid or some scare tactic. Just look at the financial markets with regulations in place. Small mistakes along with regulatory eyes looking the other way produced a major meltdown in the banking industry. It didn't happen overnight . It was a result of small things happening over time. Banks will recover, people will endure from this catastrophe in a short time span 10 to 15 years at the most. The water and land in northern Minnesota if the wastelands get developed will take many lifetimes to recover, if at all.

Do we really need another Love Canal? Do we really need a another Gulf of Mexico oil rig disaster? The mining industry doesn't have a very good track record in conforming to and following government regulations. So I say no to PolyMet . It's not worth the price.

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**Comment Number** LE 408-1

**Commenter Name** Ann Diers

**Comment** As a resident in the area I am very concerned with how exchanging federal lands for mining will impact my water resources and water quality.

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## SOO Statement of Opinion

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**Comment Number** LE 409-1

**Commenter Name** Richard Jacobi

**Comment** We have to look at Wisconsin's example and ask ourselves why they made it practically impossible to pursue this type of mining. We don't know what Polymet is going to do that is different from past practice. We will have some control if the lands in question remain in public ownership.

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**Comment Number** LE 410-1

**Commenter Name** David Krings

**Comment** I fully support the proposed land exchange that Polymet has offered to acquire the land needed to develop the mining operation at/near the former LTV Taconite Mining site. This project has been held up far too long.

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**Comment Number** LE 411-1

**Commenter Name** Nancy Stevenson

**Comment** Oh, My God! This is entirely UNACCEPTABLE! Leave our lakes and wilderness alone. Invest in solar and wind and GO AWAY!!!! All you do is DESTROY things.

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## SOO Statement of Opinion

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**Comment Number** LE 412-1

**Commenter Name** Shaun Karakash

**Comment** I have grown up in Norther Minnesota and was raised on fishing, hunting and camping. I have also had a resort on Lake Vermilion for many years. If there is any chance that this mining process has a breach in their "safety" features, it would ruin the lakes, rivers and wildlife for the entire northern minnesota. Our resort is the sole support for my family. What about all the other businesses run in the surrounding area. Tourism in Northern Minnesota is the key to our future and this would destroy the livelihood of many families and the future generations. We are good stewards of our lake and work hard to protect it against anything that would threaten the lakes, land and wildlife. The BWCA is right at the doorstep of this project. Are you as our decision maker ready to put that pristine wilderness in jeopardy? For what, a few jobs for 20 years and then the mine is gone and we are left with an aftermath that cannont be cleaned up. What about the clean air act that covers the BWCA? Is Polymet able to decide which way the wind will blow their pollution? I doubt that. I am urging you to vote against Polymet and leave Northern Minnesota in the pristine position it is in now for many to enjoy now and in the future generations. I would love for my 5 year old son to be able to live the way of life I did when I was growing up. I can't imagine having to tell him we cannot fish, hunt or play in the lakes because some people were more interested in making money than protecting our wilderness. There has been enough destruction around the country from this type of mining and i can bet if you asked people around the country where this has taken place, they would tell you too, do not let it happen. Look up the devastation on line and see what the impact of this has had in the past. That should be enough of a scare to make anyone vote against this.

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**Comment Number** LE 413-1

**Commenter Name** James Mickelson

**Comment** I believe that in the short term this project will provide some jobs for a finite period of time. This area of the state can not tolerate this type of usage without long term effects. This is a very fragile environment which cannot be replaced. A project of this type can offer a short term bandaid to our employment problem but will be a headache to the state for many generations into the future. We need to say NO to this project and get on with real beneficial projects for the people of Minnesota!

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**Comment Number** LE 414-1

**Commenter Name** Ben Tsai

**Comment** This process releases acid and toxic metals that can pollute rivers and groundwater for hundreds of years -- long after the profits are spent and the products buried in landfills.

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## SOO Statement of Opinion

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**Comment Number** LE 415-1

**Commenter Name** Denise Rokke

**Comment** One of the best things about Minnesota is our northern forests and wetlands.

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**Comment Number** LE 416-1

**Commenter Name** Mike Link

**Comment** I have guided in the Boundary Waters, my wife and I walked around Lake Superior to draw attention to Fresh Water issues and we have written numerous books on the region. In addition, I teach geology courses and I cannot see any way that this mine can be safe.

I object in every way I can and I hope to inform everyone I know about this travesty. Say no to the mine and yes to the future.

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**Comment Number** LE 417-1

**Commenter Name** Carlyn Iverson

**Comment** There is an end vision to our choices we make today. Our community, the people of Minnesota, have a vision of the future for all of our grandkids and great grandkids. This vision is one of sustainability, of our waters, lands, and air far into the future.

To understand that we trade off the health of our waters, the continuity of animal habitat, the quality of soils and air in northern Minnesota for the pursuit of profit in extracting resources for short term gain. We need to weigh the financial gain of a few during the short term against a very possible great loss of these same waters, soil, and air for a very, very long time for the many Minnesotans to follow.

History here and around the world is showing all of us that the time has come to slow development, slow population growth, and choose wisely for a sustainable future on a planet that is not stripped of it's beauty and health. May we come to this wisdom before we see more and more loss for our children and grandchildren and great grandchildren.

Can we go forward with sulfide mineral mining in Minnesota knowing with certainty that we can protect one of the largest, clean and productive watersheds on the planet? The technology is not here that will provide that guarantee.

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## SOO Statement of Opinion

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**Comment Number** LE 419-1

**Commenter Name** Ronald Williams

**Comment** The suggestion of the putative swap of national forest land for other land is truly appalling.  
This is no swap in any realistic sense. A swap implies an even exchange, of which there is none here. American citizens are being asked to give away their property so that an international company will be able to make billions in profits and leave behind a toxic wasteland. The carving up of the landscape will create a ghastly landscape which would take millennia, if ever, to recover. Ground water for a much greater area than the area in question itself would become toxic for at least centuries and quite possibly make a large area uninhabitable for humans. There is no way the company could prevent this environmental degradation once the mining is consummated, even if it wanted to, which, of course, it does not. This is much too high a price to pay for a few jobs for a few years. It is up to the government to protect communal property. In this case the government must protect private property surrounding the area in question as well. Please do your job. Thank you for your consideration.

---

**Comment Number** LE 420-1

**Commenter Name** Gretchen Flynn

**Comment** I am very concerned about the proposed permit for PolyMet to mine copper in northern Minnesota because the history of the copper industry is one of pollution and poisoning of the waters around it.

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**Comment Number** LE 420-3

**Commenter Name** Gretchen Flynn

**Comment** I wonder if any of the people making this decision has traveled to and observed the mines that PolyMet has developed in Canada and what the environmental consequences have been. Why should we trust their promises that they can do this without any damage to the water and lands around this site.

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**Comment Number** LE 421-1

**Commenter Name** Barbara Kratzke

**Comment** Please stop the madness & greed that is destroying our country.  
This is Lucacris. STOP! STOP! STOP!

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**Comment Number** LE 425-1

**Commenter Name** Warren A. Olson

**Comment** I am writing to voice my opposition to the land swap of Federal land for land proposed to be purchased private land by PolyMet corporation. My reason is principally the history of pollution caused by copper-nickle mining.

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## SOO Statement of Opinion

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**Comment Number** LE 426-1

**Commenter Name** Bob Jackson

**Comment** I believe it is quite disingenuous of you to first solicit comments on this land swap, and then tell us what kind of comments you want to hear, i.e. "Scoping comments are most useful if they refer to an activity or mitigation rather than stated values." Are you planning to move forward in this land-swap process without taking the values of the commenting public into consideration? Are you prepared to ignore the value of the land you want to acquire verses the value of the land you are prepared to give up?

A mining company, whose primary motive is to make as much money as possible for its shareholders, buys land it doesn't want in order to trade it to you for land it will absolutely degrade. Without this swap, none of the land on either side of the equation will suffer, and you suggest that I not make the comment, "I don't think you should exchange any land." What kind of public policy process is this?

If you trade sixteen sections of land, you go into this deal knowing that PolyMet will tear up most of the land and water in seven of them.

---

**Comment Number** LE 426-3

**Commenter Name** Bob Jackson

**Comment** You will know that the records of past open-pit mining companies, despite their assurances that no harm will ensue from their activities, are particularly dismal.

I'm not trying to tell you that no mining should ever take place. I'm trying to tell you that this particular land swap should not be allowed.

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**Comment Number** LE 426-5

**Commenter Name** Bob Jackson

**Comment** Please don't try to tell me that, because other reckless mining activity has degraded nearby sections of land, now it's okay to dump good land after bad.

The land trade you are proposing deeply offends me. I am stating these values to you in the clearest terms I know how, and I sincerely hope you take them into consideration as you move forward in your scoping process. Northern Minnesotais my home away from home. Please do not enable a mining company to ruin it.

## SOO Statement of Opinion

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**Comment Number** LE 427-1

**Commenter Name** Barbara Pilling

**Comment** This can not happen!!!  
Please think of our children, the next generation who need and deserve for us to care for the earth and preserve as much natural resource as possible.

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**Comment Number** LE 430-1

**Commenter Name** Amy Ries

**Comment** Wisconsin banned this type of mining, thereby conserving the Wolf watershed. We need to do the same here. The idea of a Canadian company destroying so many acres of prime Minnesota forest is deeply offensive to me.

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**Comment Number** LE 432-1

**Commenter Name** Michael Gass

**Comment** Again, I am opposed to this land exchange.

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**Comment Number** LE 434-1

**Commenter Name** Carol Schaaf

**Comment** National Forests were set aside to preserve them from this kind of thing. Opening them up for private enterprise is INSANE!!!

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**Comment Number** LE 435-1

**Commenter Name** Terri & Kent Ross

**Comment** and most importantly the destruction of pure water and lands in the Boundary Waters that is Minnesota's legacy.

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**Comment Number** LE 436-1

**Commenter Name** Ben Davis

**Comment** In addition, the boundary waters of Minnesota and the surrounding area is truly majestic and it would be a shame if it was lost for our and many future generations.

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**Comment Number** LE 437-1

**Commenter Name** Rachel Arata

**Comment** Every year we destroy more and more of what is natural to our world. Destroying what we live off of will destroy us and the future generations will suffer from our ignorance and selfishness. The time is running out to fix our mistakes, yet instead we continue to create more problems. When will we stop?

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## SOO Statement of Opinion

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**Comment Number** LE 438-1

**Commenter Name** Trudi La Rose

**Comment** I want to bring my children to see the wonder of the boundary waters but not if we allow a private company to lay waste to it. I'll find another state to spend my tourism dollars in. We need to think strategically about the resources we have and find better ways to "exploit" them.

---

**Comment Number** LE 439-1

**Commenter Name** Wayne Passow

**Comment** The land was set aside for a purpose. Let's not go backward. Once this land is lost we can't get it back.

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**Comment Number** LE 441-1

**Commenter Name** Ronald Roed

**Comment** We just returned from a fall vacation in this region where each day was spent hiking in a different area. What a shame to think of destroying all this beauty. And for an outstate one at that!

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**Comment Number** LE 442-1

**Commenter Name** Robert Johnson

**Comment** I was born and raised here in northern Minnesota and I am totally opposed to PolyMet mines in the area I live in. Do not let them destroy our environment for their own personal greed!

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**Comment Number** LE 443-1

**Commenter Name** Rosita Aranita

**Comment** We do not need to pollute our environment more nor push our scarce wildlife to extinction! stand firm against the lures of money over creation.

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**Comment Number** LE 444-1

**Commenter Name** Kristi Kowal

**Comment** We appreciate you being the voice of the people that want to insure that minning companies are not allowed to destroy our land and nature that is so dear to Minnesotan's. Please make a stand and let these minning companies know that we will not allow this destruction and comprise the scenic beauty and natural areas that are intregal to wildlife and the areas that are so important to preserve for Minnesota tourism.

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## SOO Statement of Opinion

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**Comment Number** LE 445-1

**Commenter Name** Nancy & Donald Oestreich

**Comment** Do not sacrifice our children's future for immediate rewards.

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**Comment Number** LE 446-1

**Commenter Name** Bruce Reno

**Comment** I would like to know who is going to pay for the water and land contamination that will happen with this type of mining. What would be the economic impact to the state when all costs are accounted for from contamination to surrounding areas, loss of tourism dollars from contaminated water, lakes and streams from the disposal of waste materials. Stripped land that will not be able to regenerate itself due to the loss of the limited nutrients that already keep the area forested as has been shown from other strip mining across the country.

I do not believe the few and limited jobs that will be created will offset any of this and this is not in the best behalf of the residents of the State of Minnesota or there would have been more public announcement so people could have the real cost to them for this mining operation. If you believe this to be not the fact then make public on an widely advertised media the cost to benefit ratio the advantages to the State of Minnesota and its residents. This should include all costs and benefits or liabilities now and in the future. Plus why and who would want to stand in the way of a long standing review process

other than to prevent the real impact to be unknown so that this known contaminate mining could be approved. It is your obligation and duty as an official of the USFS to do what you were appointed to do and not by-step your responsibilities to the people of the United States and Minnesota and all other states.

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**Comment Number** LE 448-4

**Commenter Name** Dorie Reisenweber

**Comment** The proposed land exchange is tantamount to the toppling of the first domino thus opening Minnesota's Arrowhead region to sulfide mining and to the evisceration of laws protecting the environment. The proposed land exchange provides no acceptable mitigation for the losses of plants, animals, clean water, or other natural resources.

It is not the promise of short-term jobs or economic gains which life requires. It is clean water. Water is the constant all depend on for life, not on the transience of mines. Do not release to or exchange lands with the sulfide mining companies.

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**Comment Number** LE 449-1

**Commenter Name** Carl Sack

**Comment** The proposed land exchange between the Forest Service and Polymet is a borderline-illegal maneuver that runs directly counter to the intent of the Weeks Act, which is that lands purchased by the forest service "shall be permanently reserved, held, and administered as national forest lands." There is no right price or exchange that can justify breaking this public trust.

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## SOO Statement of Opinion

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**Comment Number** LE 449-4

**Commenter Name** Carl Sack

**Comment** The lack of allowance for public hearings at every stage of this project smacks of favoritism toward Polymet's success.

I very sincerely urge you NOT to grant Polymet their desired land exchange.

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**Comment Number** LE 450-1

**Commenter Name** DAVID REISENWEBER

**Comment** The proposed forest service land exchange to facillitate sulfide mining is plain stupid. This is not the area to attempt to prove that this type of mining can be done without polluting the surrounding waters. This technoolgy has never been proven. All water from these proposed areas drains either into Lake Superior or the Boundary Waters. Protecting these areas is much more important than mining these areas.

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**Comment Number** LE 452-1

**Commenter Name** Randy Neprash

**Comment** I am opposed to a land exchange that is meant to remove long-standing environmental protections on Superior National Forest public lands against strip mining. The land exchange would pave the way for PolyMet to strip mine national forest lands protected by the Weeks Act of 1911 and open a sulfide mining district across Minnesota's Arrowhead Region. A land swap if, approved, would have very negative environmental impacts on forests, wetlands and wildlife.

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**Comment Number** LE 456-1

**Commenter Name** Dennis Szymialis

**Comment** First, the property which the forest service desires to transfer is owned by the people of the United States and is not owned by the Superior National Forest. Second, The transfer will not provide for an uninterrupted operation of the LTVSMC plant because it has not operated for ten years. Third PolyMet is not applying to the Corps of Engineers for a permit to dispose of fill because this is in fact toxic waste. The Notice indicates that a scoping package would be sent to interested parties for a 45 day comment period. I wrote a 15 pages of comments on the PolyMet DEIS which provided public notice that I am an interested party and no package was ever sent to me. My comments were more detailed and expert based than most of the environmental organizations that submitted comments.

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**Comment Number** LE 456-4

**Commenter Name** Dennis Szymialis

**Comment** For the convenience of telling this lie the Forest Service treats its proclamation as a substitute for comments and due process regarding these effects."Provide and sustain benefits to the American people", how does giving free access to what is claimed to be billions of dollars in minerals benefit anyone other than the foreign majority owned corporation of PolyMet? What is sustained once the minerals are gone other than the toxic effects of pollution? Are they kidding?

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## SOO Statement of Opinion

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**Comment Number** LE 456-5

**Commenter Name** Dennis Szymialis

**Comment** The Forest Service puts forth the argument that PolyMet will further it's stated purpose of multi-use. There is already mining in the area. Prior nearby mining is used as an argument for more mining. Establishing PolyMet for mining only is not multi-use.

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**Comment Number** LE 456-8

**Commenter Name** Dennis Szymialis

**Comment** Furthermore, Minnesota has directly subsidized through state agencies and political subdivisions the operations of PolyMet through drilling subsidies, PUC rate increases to Minnesota power intended to benefit PolyMet, and through other grants and loans to PolyMet and other mining companies intended to use the processing facilities at PolyMet. The land exchange is just another subsidy to PolyMet which would not be a viable company on its own and puts the risk of investment on Minnesota citizens for the business failure and clean-up of PolyMet. These agreements along with a wetland exchange in the Floodwood MN area that was successfully challenged in court are themselves violations of the law and principle of connected actions. This wetlands exchange principle continues to be violated with the recent sale of the 320 acres of Lake County land to PolyMet to be used for wetlands mitigation on the eve of the submittal of these comments. The Forest Service and Corps of Engineers by making themselves partners in this case not only promote stealing from the taxpayers of the State of Minnesota, agency porkbarrel funding, but also encourages a violation and makes them a conspirator to a violation of the law for which they should be ashamed and prosecuted or fired from their positions.

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**Comment Number** LE 456-10

**Commenter Name** Dennis Szymialis

**Comment** PolyMet and its other mining agents which will come to utilize PolyMet for processing will only be back at the federal trough to suck up more of OUR federal lands and waters. They should also insist that the public get full information as should federal agencies. The connected action for the power rate subsidy remains undisclosed to the public. It is filled with claims of trade secrets which is a violation of principles of due process notice. PolyMet officials have been allowed free reign to make false claims to the media and at presentations to groups like their claims that they would turn the mine sight into a park with fishing in the pit lake, bike trails, picnic tables swimming and the like. This is a fraud on the American people.

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**Comment Number** LE 457-2

**Commenter Name** Jane Koschak

**Comment** The chance that it "can be done right" as the mining companies propaganda states over and over again, in northeastern Minnesota's watery ecosystem without polluting our most valuable, cherished lakes, rivers, streams, and the very air we breathe is slim. And the price we would all pay is very high—both environmentally and financially.

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## SOO Statement of Opinion

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**Comment Number** LE 457-3

**Commenter Name** Jane Koschak

**Comment** I believe that some serious common sense must prevail in this proposed land exchange between the US Forest Service and PolyMet Mining, Inc (PolyMet) with the purpose of allowing a foreign sulfide mining company to garner federal lands so that copper, nickel and other precious minerals could be extracted resulting in the ultimate degradation of U.S. public lands, wetlands, and the entire watershed leading into Lake Superior. PolyMet, a Canadian company, has never actually operated a mine and proposes to use unproven techniques to mine these minerals from water rich lands of northeastern Minnesota.

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**Comment Number** LE 457-8

**Commenter Name** Jane Koschak

**Comment** •The public interest will not be served by taking the present lakes district of Minnesota's Arrowhead region to turn it into a mining district that will strip mine national forests protected by the Weeks Act. Why would the US Forest Service approve of such a plan when their mission has been to preserve and protect public land for the recreational purposes of the public? Literally, thousands of people recreate on the present federal lands, and if the proposed land exchange were approved, PolyMet would lead the way for other sulfide mining company's ventures in and around the Boundary Waters Canoe Area, with the destructive potential of creating an even larger mining district. To allow a land exchange that results in replacement of a lakes district for a mining district does NOT serve the Public Interest.

How does the USFS think that replacing a lakes district, with the potential to be inclusive of the Boundary Waters Canoe Area, with a mining district will serve the Public Interest?

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**Comment Number** LE 457-9

**Commenter Name** Jane Koschak

**Comment** •The USFS Scoping Letter states, that: "Additional national forest acreage adjacent to the project site is proposed for inclusion in the land exchange as a means to...eliminate conflicts if minerals development were to expand in the future". The potential loss of what could be called "buffer" lands (over and above the mining site) is also disturbing. This would facilitate future and further mining with future and further destruction of more public wetlands, public lands, and public watersheds. Why would the USFS include these lands in the land exchange, if not for this reason? To allow a land exchange that results in even more public land acreage being utilized for sulfide metal mining with stockpiling of overburden ultimately resulting in more acid mine drainage along with other potential environmental risks does NOT serve the Public Interest.

How does the USFS think that adding additional acreage adjacent to the project site for inclusion in the land exchange, which will result in more destruction of wetlands, public lands, and water sheds, will serve the Public Interest?

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**Comment Number** LE 457-16

**Commenter Name** Jane Koschak

**Comment** 16.How can the USFS ignore the degradation of USpublic lands by foreign companies?

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## SOO Statement of Opinion

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**Comment Number** LE 457-18

**Commenter Name** Jane Koschak

**Comment** I am vehemently opposed to a land exchange that is meant to remove long standing environmental review and protections from public lands of the Superior National Forest against strip mining. This land exchange would facilitate the first sulfide metal mine in Minnesota. It is in the Public's Long Term Interest to retain the USFS's current ability and requirements to control how PolyMet mines on USFS public lands as stated under the Weeks Act.

The USFS is mandated to protect and preserve the land, air, water, animal and other natural resources of the public lands being proposed for exchange. I expect this to be upheld, as it is in the Public Interest. Common sense must prevail.

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**Comment Number** LE 459-1

**Commenter Name** Zachary Johns

**Comment** I moved to the Iron Range from the Twin Cities area 14 years ago precisely because of the beautiful unspoiled land and water. Please help us keep it that way!

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**Comment Number** LE 461-1

**Commenter Name** Shirley Humphrey

**Comment** Please don't allow this beautiful area of MN to be spoiled. Apart from the environmental implications, which are bad enough, this is an area that families have enjoyed for generations, and it would be a crime to take this away. Think of the wildlife....what are the implications for those poor creatures. Please do not let this happen.

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**Comment Number** LE 462-1

**Commenter Name** Frank Ongaro

**Comment** Mining Minnesota and its members strongly support the proposed land exchange. The land exchange will eliminate the conflict over the public land and mineral reserve.

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**Comment Number** LE 465-2

**Commenter Name** Tod Rubin

**Comment** However, the USFS appears to have no plan or policy for such exchanges. This Polymet land exchange will set numerous precedents for future exchanges, and must be handled carefully.

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**Comment Number** LE 466-1

**Commenter Name** Dan Marich

**Comment** I value this opportunity to submit my comments on the land exchange between the U.S. Forest Service and PolyMet Mining Corporation. As an avid outdoorsman, I applaud this positive resolution in clarifying the differences over public lands and PolyMet's mineral leases.

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## SOO Statement of Opinion

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**Comment Number** LE 466-3

**Commenter Name** Dan Marich

**Comment** All in all, I feel this is a winning combination for all parties involved. The U.S. Forest Service, PolyMet Mining and the general public. This is truly a common sense approach to provide economic growth and stability, sustain and maintain environmental integrity and provide and protect Minnesota's nature for our future generations.  
Thank you for the opportunity to submit my comments, thoughts and support.

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**Comment Number** LE 475-2

**Commenter Name** Lorie Skudstad

**Comment** Minnesota Power appreciates the efforts of USFS in their comprehensive review process and looks forward to the completion of the NorthMet Land Exchange. Minnesota Power believes a thorough and exhaustive review process requires ket parties asking the right questions to provide a framework and mechanism for ensuring that responsible stewardship of our precious resources is maintained.

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**Comment Number** LE 475-3

**Commenter Name** Lorie Skudstad

**Comment** Minnesota Power also concurs with the USFS opinion that the lands offered by PolyMet would complement existing federal ownership by eliminating or reducing private inholdings; and potentially enhance public recreation opportunities.

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**Comment Number** LE 477-1

**Commenter Name** Ben Hinz

**Comment** I would like to formally request a new DEIS which is made available to the public. I oppose any land swap, or sale, simply to circumvent existing Federal Legislation.

Whenever critical information is left out or brushed over in a DEIS, there is a problem. With its water-intensive nature and fractured bedrock setting, with little or no protective overburden, northern Minnesota is not a feasible place for sulfide mining.

Whenever critical information is left out or brushed over in a DEIS, there is a problem. With its water-intensive nature and fractured bedrock setting, with little or no protective overburden, northern Minnesota is not a feasible place for sulfide mining.

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**Comment Number** LE 479-3

**Commenter Name** Eric Viken

**Comment** If these issues are addressed I would see the land exchange more favorably but I currently feel it would be a very bad deal to exchange the proposed lands.

The US Citizens should get the full value of the land and not subsidize the mining by providing land exchanged at discounted values.

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## SOO Statement of Opinion

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**Comment Number** LE 482-1

**Commenter Name** LeRoger Lind

**Comment** Based upon the information at hand and our previous involvement in comments on the PolyMet Northmet project, we cannot support either the mining project or the associated land exchange. As stakeholders we are concerned about the potential destruction of natural habitat and the pollution of both air and water in the Lake Superior watershed that would be associated with both actions.

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**Comment Number** LE 482-5

**Commenter Name** LeRoger Lind

**Comment** In view of the publically announced intension of the various foreign mining companies involved in exploratory drilling in the area to create a non-ferrous mining district starting a few miles from the BWCA this is especially relevant.

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**Comment Number** LE 482-7

**Commenter Name** LeRoger Lind

**Comment** This particular Land Exchange DEIS must deal with the social consequences and costs of subjecting future generations to health and financial damages from a Land Exchange that benefits current foreign land owners who will be gone before these consequences are realized.

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**Comment Number** LE 485-1

**Commenter Name** JoAnn M. Olson

**Comment** I am forwarding a letter I emailed to Mr. Ahlness in February of this year. (Please see below). My feelings and conclusions have not changed. Northeastern Minnesota is a unique and wonderful place. As you may know, this area has some of the oldest rock in the world and we are home to important water systems that feed into Lake Superior.

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**Comment Number** LE 485-3

**Commenter Name** JoAnn M. Olson

**Comment** It's seems to be such a short sighted approach to the health and longevity of the environment which ultimately affects the quality of life of everyone who lives, works and plays in the region. Moreover, water systems are not bound by state lines. Water quality in Minnesota affects water quality in the upper Midwest, nationally and globally.

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**Comment Number** LE 485-4

**Commenter Name** JoAnn M. Olson

**Comment** Corporations do not have the common good of the populace in mind when making decisions. Mining companies have not traditionally taken the responsibility to protect the environment when they are extracting minerals from the earth. The executives and boards of directors are only interested in the bottom line. What makes you think that that attitude has changed, that these companies will do anything to protect the overall quality of the environment for those of us who live in the area, let alone for future generations.

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## SOO Statement of Opinion

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**Comment Number** LE 485-6

**Commenter Name** JoAnn M. Olson

**Comment** Please accept my preface along with the attached letter as my feedback on the proposed PolyMet mine. I do not have a lot of hope that my opinions and views will be considered in the outcome. It seems that big money and corporations will have their way and the people will have to suffer the consequences. That is the way it has always been. However, it would be absolutely marvelous if you, the U. S. Forest Service and the State of Minnesota would prove me wrong.

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**Comment Number** LE 485-7

**Commenter Name** JoAnn M. Olson

**Comment** I am concerned about the impact on fish and wildlife of the proposed PolyMet Mine in Superior National Forest and urge you to better analyze the proposed mine. I own a 40 acre historic Finnish immigrant homestead in the Superior National Forest on Little Creek Road in Brimson, Minnesota. My property is included in PolyNet's mine site. I do own the mineral rights to my 40 acres which puts me in a very precarious position.

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**Comment Number** LE 485-11

**Commenter Name** JoAnn M. Olson

**Comment** Please protect the fish and wildlife that currently thrive in Superior National Forest and safeguard this area for future generations.

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**Comment Number** LE 486-1

**Commenter Name** Peter Dziuk

**Comment** I am concerned about the proposed land exchange between the USFS and PolyMet Mining Inc. This is nothing about a "fair" land swap – but as noted – a "connected action" to a proposed environmentally destructive project. Also, while suggesting otherwise, the proposed exchange does not in any way demonstrate that it meets, let alone exceeds, four of the Forest Service's Strategic Plan goals.

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**Comment Number** LE 486-7

**Commenter Name** Peter Dziuk

**Comment** That being said, the FS to date has not fully demonstrated to my satisfaction that it has either the vision or resources to effectively manage its present holdings.

As a square foot for square foot swap this exchange is unjustifiable and untenable.

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**Comment Number** LE 486-9

**Commenter Name** Peter Dziuk

**Comment** That mineral owners find a method to take what they have come to possess by their economic means, remove it and leave the rest would greatly solve many problems – they cannot. That the FS would abrogate their mandate and keep the forest would be the end of conflict – they cannot. The FS bears as great of scrutiny for the ultimate consequences of their actions as the mineral owner are to be held for the ultimate consequences of theirs.

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## SOO Statement of Opinion

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**Comment Number** LE 486-11

**Commenter Name** Peter Dziuk

**Comment** Regarding my own personal connection and interest to the Arrowhead region, I am a botanist, ecologist and imaginographer. I have and will travel extensively throughout the region documenting and recording plant species and their rapidly diminishing habitats. The only expansion of my activities this mine would affect would be an unfortunate witness to the further encroachment of invasive weed species such destructive activity inherently causes. At present the FS is bedeviled with this problem beyond its means already. There is every imperative against this mine, in this place and in this time. A century old next year, the Weeks Act was a loud public voice of understanding in addressing these concerns and enacted into federal law for that reason. Having spoken once – must it be made to speak again? A FS decision supportive of this land exchange is precedent setting, smears tailings mud on the face of an evolving democratic public ideology and marks a significant de-evolution of public ideals. As great as the depth and magnitude of the permanent physical scar this action will incur on the Earth's skin, it will also forever call into question the tenure of the USFS's moral vision and integrity.

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**Comment Number** LE 489-1

**Commenter Name** Stanley Bozarth

**Comment** And the land will be permanently poisoned.

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**Comment Number** LE 492-1

**Commenter Name** Claudia Ripley

**Comment** Enough is enough! What good is money from this mine if there is no safe, natural world to enjoy! MONEY CAN'T BUY MOTHER NATURE.

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**Comment Number** LE 493-1

**Commenter Name** Elizabeth Stites

**Comment** My family has been to the Boundary Water on numerous occasions as have many of my friend. This is pristine wilderness that we can not afford to pollute. If Wisconsin is not willing to move ahead with this, I fail to see why MN would do so until further study is available. The loss to habitat and valuable clean water resources is critical.

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**Comment Number** LE 495-1

**Commenter Name** Mary Mahowald

**Comment** Wisconsin has banned this until proven non-toxic. Why would we allow it in Minnesota?

I am greatly concerned with the loss of wetlands and the loss of the "one hundred mile swamp;" with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx critical habitat. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves. The losses far outnumber the gains--at least the gains for Mother Earth and the future of our children.

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## SOO Statement of Opinion

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**Comment Number** LE 497-1

**Commenter Name** George Johnson

**Comment** DON'T DO THIS!

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**Comment Number** LE 502-1

**Commenter Name** Emily Clarke

**Comment** Please save the lands that have been my homelands for years. Our natural beauty must be preserved for years to come-- utter ruin and total devastation would come from this type of mining.

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**Comment Number** LE 504-1

**Commenter Name** James More

**Comment** I have fished the border lakes of Namakan and Katamagomba and the presine outdoors has been outstanding and extraordinary, so please do not destroy that natural beauty where we go to be with God in nature.

Homeless Spartacus

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**Comment Number** LE 506-1

**Commenter Name** Jeff Kitterman

**Comment** Sulfide Mining has proven to be one of the worst environmental disasters our country has endured. All you have to do is look at the experience of Wisconsin, Montana and Utah to see that this is a very bad idea for Minnesota. The Polymet conglomerate asserts that 'they have the technology' to do it safely, but that is just what BP said about deep water drilling.

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**Comment Number** LE 507-1

**Commenter Name** Tom Canning

**Comment** Please consider this.

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**Comment Number** LE 508-1

**Commenter Name** Sean Skibbie

**Comment** I am particularly concerned by the impact of this proposal on a tourism industry that brings millions to the region annually. This is a project that will bring in a small amount of profit at the expense of a sustainable tourism industry that offers billions in future revenue.

The Superior National Forest should be conserved, as it has been since 1911. This was a promise made to the American people and Minnesotans by its government, one that has been standing for almost 100 years. It should not be broken today, tomorrow, or at any other point in the future.

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## SOO Statement of Opinion

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**Comment Number** LE 512-1

**Commenter Name** John Dyer

**Comment** We vacation in this area yearly and will likely not do so with the the loss of open forests and habitat for animals as well as the added machinery, pollution and noise to the area.

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**Comment Number** LE 513-1

**Commenter Name** Hugh Curtler Iii

**Comment** Thank you for your time and your consideration of this important conservation matter.  
I am greatly concerned with the loss of wetlands, including its potential impact on water resources.

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**Comment Number** LE 514-1

**Commenter Name** Karl Zemlin

**Comment** I have strong roots in northern Minnesota, with many family members still living up there. I spent my summers in the north woods and made many trips into the BWCA. The destruction and pollution of the area would be tragic. This cannot be looked at as a purely economic decision. There is far too much at stake.

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**Comment Number** LE 544-1

**Commenter Name** Leslie Prah

**Comment** The destructiveness of strip mining, and the hazards of sulfide mining in particular, far outweigh any short term benefit that could result. Short term profits accrue to a few owners; the long term costs of destruction of the environment, including water supplies, is passed on to the public. If the actual costs of the mining are determined, I'm confident that the operation becomes unprofitable. Please don't allow this exchange to take place.

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**Comment Number** LE 545-1

**Commenter Name** Patricia Olson

**Comment** As a resident of Superior, Wisconsin, I am especially concerned about the potential damage to our precious natural resources posed by the approval of this permit and land exchange. The BWCA and the pristine natural habitat surrounding it contribute to the quality of life and to the local economy of my area.

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**Comment Number** LE 546-1

**Commenter Name** Erik Peterson-Nafziger

**Comment** Please carefully consider the long-term results of this decision. The short term benefits of this project are surely outweighed by the value of these resources for the people of Minnesota long into the future.

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## SOO Statement of Opinion

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**Comment Number** LE 547-1

**Commenter Name** Phyl Morello

**Comment** Is there nothing you wouldn't do to help big polluting businesses?????/ Shame on you for even thinking of allowing this tyhpe of strip mining on our public lands or any land for that matter.

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**Comment Number** LE 548-1

**Commenter Name** Shaun Gosse

**Comment** Wetlands are one of our most endangered habitats and mining is one of the most destructive industries we have. To allow a transfer of land from public to private ownership with the sole purpose of circumventing laws to protect wetlands is unconscionable

I would rather have the Forest Service keep the land and protect the watershed. I believe the mineral resources will only become more valuable with time and that it is too dangerous to the ecological resources in the area to allow sulfide mining.

Please protect the public interest by acting against the land transfer and against opening any new sulfur mines.

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**Comment Number** LE 549-1

**Commenter Name** Brian Grivna

**Comment** Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of irreplaceable habitat for myriad plant and animal communities. Any informed citizen knows that these mine types ALWAYS result in irreversible damage, leaving the taxpayers with remediation costs and the shareholders sunning in the Bahamas. This is WRONG!

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**Comment Number** LE 550-1

**Commenter Name** Marcy Leussler

**Comment** I want to see the evidence that this is safe. Any where that they have done this type of mining, has resulted in major damage to the environment and the mining companies walk away from the results. We don't want this in Minnesota.

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**Comment Number** LE 552-1

**Commenter Name** Jan Reineck

**Comment** I am deeply concerned about the rapid destruction of our wonderful wild lands. There is so much beauty that will be lost never to be regained if this plan goes through .

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## SOO Statement of Opinion

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**Comment Number** LE 553-1

**Commenter Name** Janet Magree

**Comment** As a resident of Duluth, the threat to Lake Superior from a strip mine in the watershed adds insult to injury. We owe it to future generations to continue efforts to clean it up from former abuses and current sewage issues, without adding new sources of pollution.

As the owner of 80 wooded acres in the Superior National Forest, I am greatly concerned with the loss of wetlands and the loss of the "one hundred mile swamp;" with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx critical habitat. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves. We bought our land for the express purpose of supporting the very attributes that are threatened by PolyMet's proposed strip mine.

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**Comment Number** LE 556-1

**Commenter Name** Deborah Huskins

**Comment** Mr. Sanders, I oppose what appears to be collusion between the federal agency and the mining companies. Your agency should be protecting the environment, and objectively analyzing the proposed actions. By facilitating the Land Exchange, the agency is doing neither.

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**Comment Number** LE 556-2

**Commenter Name** Deborah Huskins

**Comment** The environmental threats of sulfide mining should not be minimized--once the damage is done, it will be decades if not centuries before the damage can be mitigated. The benefit of the small number of jobs made available in the short term will be far outweighed by the devastation to the environment and the local economy built on enjoyment of the environment.

Please do not grant approval of the land exchange.

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**Comment Number** LE 557-1

**Commenter Name** Jacob Krause

**Comment** It is not hard to imagine, based on the facts of the matter, numerous bad outcomes of this exchange.

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**Comment Number** LE 558-1

**Commenter Name** Mary McGilligan

**Comment** There is no safe sulfide mine in the world.

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## SOO Statement of Opinion

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**Comment Number** LE 559-2

**Commenter Name** Julia Bohnen

**Comment** Do not "give-away" the citizen's land - my land. These public properties are valuable as wild land and also provide a buffer to the Boundary Waters Canoe Area Wilderness. I am opposed to a land exchange that would allow harmful mining close to the BWCAW. Such an exchange would have detrimental effects on the wilderness experience sought by many in the BWCAW.

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**Comment Number** LE 560-1

**Commenter Name** Helen Duritsa

**Comment** You must protect these areas from the damage that will occur from the mining on this sensitive area.

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**Comment Number** LE 561-1

**Commenter Name** Bill Robertson

**Comment** I was also planning on hunting during your deer season which is an out-of-state license. I will not if this goes through.

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**Comment Number** LE 564-1

**Commenter Name** Amanda Meyer

**Comment** Wetlands play an integral role in ecosystem health. They purify the air and water, provide flood control, and are important habitat for flora and fauna, including migrating waterfowl and threatened species like moose, lynx, and wolves. Northern Minnesota is lucky to have so many wetlands. We must acknowledge their importance and intentionally maintain this precious ecosystem resource.

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**Comment Number** LE 564-3

**Commenter Name** Amanda Meyer

**Comment** Sulfide mining already has a bad track record. Acid mine drainage has contaminated more than 12,000 miles of rivers and streams and over 180,000 acres of lakes and impoundments in the U.S. alone

I worry that, by allowing Polymet to move forward with this mine, we are opening the door for construction of many more mines. The risk of environmental damage is too great for the short-term gains from mining the area.

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**Comment Number** LE 566-22

**Commenter Name** Marc Fink

**Comment** Based on the information provided, it appears to be beyond any doubt that the lands proposed to be conveyed to PolyMet, which would allow the company to surface mine the underlying minerals, far outweigh the economic value of the lands proposed to be acquired by the United States through this proposed exchange.

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## SOO Statement of Opinion

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**Comment Number** LE 568-1

**Commenter Name** Steffen Demeter

**Comment** If we dont leave habitat for wildlife, what does that say about us, as a culture and people?

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**Comment Number** LE 569-1

**Commenter Name** Marina Herzog

**Comment** Please do not approve this mining project. The environmental impact on this beautiful area would be disastrous. I took my first overnight canoeing trip for 3 days into the Boundary Waters Canoe Area this past summer with my husband and fell in love. We look forward to bring our 4 children with us in the years to come. I cannot imagine this area changing in such a terrible way. There is no way to provide the protection to the environment that PolyMet is promising, no way. Everywhere in the world that this type of mining has been done, it has turned into an environmental disaster. Please do not let this happen to our beautiful state, please.

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**Comment Number** LE 574-1

**Commenter Name** Avangelina Tamis McKnight

**Comment** I am concerned about the proposed land exchange between the USFS and PolyMet Mining Inc. This is nothing about a "fair" land swap - but as noted - a "connected action" to a proposed environmentally destructive project. Also, while suggesting otherwise, the proposed exchange does not in any way demonstrate that it meets, let alone exceeds, four of the Forest Service's Strategic Plan goals.

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**Comment Number** LE 574-7

**Commenter Name** Avangelina Tamis McKnight

**Comment** That being said, the FS to date has not fully demonstrated to my satisfaction that it has either the vision or resources to effectively manage its present holdings.

As a square foot for square foot swap this exchange is unjustifiable and untenable.

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**Comment Number** LE 574-9

**Commenter Name** Avangelina Tamis McKnight

**Comment** That mineral owners find a method to take what they have come to possess by their economic means, remove it and leave the rest would greatly solve many problems - they cannot. That the FS would abrogate their mandate and keep the forest would be the end of conflict - they cannot. The FS bears as great of scrutiny for the ultimate consequences of their actions as the mineral owner are to be held for the ultimate consequences of theirs.

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## SOO Statement of Opinion

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**Comment Number** LE 574-11

**Commenter Name** Avangelina Tamis McKnight

**Comment** Regarding my own personal connection and interest to the Arrowhead region, I am a botanist, ecologist and imaginographer. I have and will travel extensively throughout the region documenting and recording plant species and their rapidly diminishing habitats. The only expansion of my activities this mine would affect would be an unfortunate witness to the further encroachment of invasive weed species such destructive activity inherently causes. At present the FS is bedeviled with this problem beyond its means already. There is every imperative against this mine, in this place and in this time.

A century old next year, the Weeks Act was a loud public voice of understanding in addressing these concerns and enacted into federal law for that reason. Having spoken once - must it be made to speak again? A FS decision supportive of this land exchange is precedent setting, smears tailings mud on the face of an evolving democratic public ideology and marks a significant de-evolution of public ideals. As great as the depth and magnitude of the permanent physical scar this action will incur on the Earth's skin, it will also forever call into question the tenure of the USFS's moral vision and integrity.

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**Comment Number** LE 575-1

**Commenter Name** Jan Karon

**Comment** For me, there is a bottom line when considering PolyMet's interest in the Iron Range. And I say No! No land should be exchanged for the wetlands they plan to destroy.

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**Comment Number** LE 575-3

**Commenter Name** Jan Karon

**Comment** Talk is cheap. Reality is harsh. Mother Nature needs our support. Sustainability of the natural habitat of northern Minnesota cannot be taken for granted; we must protect our sacred waters and lands.

Please do not agree to swap any wetlands or anything else for the sake of a project that threatens our natural world.

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## SOO Statement of Opinion

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**Comment Number** LE 581-1

**Commenter Name** Steve Koschak

**Comment** Thus, I understand the value of the natural resources involved in the proposed land exchange between the US Forest Service and PolyMet Mining, Inc. (PolyMet) for the purpose of allowing a foreign sulfide mining company to initiate the first ever sulfide metal mine in the state of Minnesota for the sole purpose of extraction of precious minerals, such as copper and nickel.

Furthermore, I understand how the process of a land exchange is supposed to work and the criteria set forth by the USFS. In the countless meetings held, we always had it impressed upon us that we must preserve the quality of the land, the quality of the water, the character of the forest and surrounding area, including the wildlife and every single variety of plant life, and to maintain the integrity and presence of the property, even adding covenants and deed restrictions to the property, such as a covenant for the Laurel Indian Culture at River Point, so that the site and the lands and waters would be preserved for the generations to come and be in the "best interest of the public". These were a fraction of the site guidelines we needed to follow and which had to embrace the USFS definition of a land exchange, which is:

Definition of a Land Exchange: " Land Exchanges are discretionary, real estate transactions between the federal government and non federal parties that serve the public interest based upon an environmental analysis."

I question, and do not believe that this proposed land exchange with PolyMet would be in the best interests of the public based upon an environment analysis. Thus, I oppose this proposed land exchange.

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**Comment Number** LE 581-7

**Commenter Name** Steve Koschak

**Comment** These statements reflect continued egregious efforts by the USFS to facilitate PolyMet's proposal to mine within the SuperiorNational Forest. They are equally evasive of the law, and equally lacking in merit. Should this land exchange occur it will reflect the fact that the USFS allowed it to happen by circumventing the very laws set forth in the Week's Act, and further illustrated by the precedence of the site restrictions that the properties indicated above had to follow in their respective land exchanges--- which caused no irrevocable damage to the environment of the Superior National Forest, unlike what will occur if the land exchange proposed by PolyMet is approved.

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## SOO Statement of Opinion

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**Comment Number** LE 581-13

**Commenter Name** Steve Koschak

**Comment** If the land exchange occurs, PolyMet will be the first of a string of sulfide mining endeavors to be proposed by other companies, such as Twin Metals, that will seek your approval. Basically, a PolyMet land exchange will open up the floodgates, and could be the beginning of exchanging the lakes district of northeastern Minnesota to a mining district, with far-reaching negative ramifications for the public interest and the public's natural resources and environment.

What you decide now has implications for the entire future of the Superior National Forest, the Great Lakes Region, the Boundary Waters Canoe Area, and the entire nation. The USFS can correct past mistakes on this controversial new type of sulfide metal mining to the state of Minnesota by taking a stand now to reject the PolyMet proposed land exchange, or be condemned later.

Make no mistake; your decision will be of national significance. Sulfide metal mining has no place in the water rich environment of northeastern Minnesota and is NOT in the Public Interest. This land exchange proposal must be rejected.

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**Comment Number** LE 584-1

**Commenter Name** Scott Pelarski

**Comment** In addition I spend a considerable amount of time fishing and camping in this area and will be less likely to do so if this mine is in operation and I am sure that I am not the only one.  
Scott R Pelarski

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**Comment Number** LE 585-14

**Commenter Name** Bradley Sagen

**Comment** Finally, in light of the numerous problems and potential negative impacts identified in these comments and those submitted regarding the DEIS, NMW requests that USFS fulfill the requirements of federal law and regulations and reject the proposed NorthMet Land Exchange.

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**Comment Number** LE 587-7

**Commenter Name** Alan Muller

**Comment** The history of mining is long and shows no examples of such mining being carried out without severe negative local impacts. Statements of the proposers, their lobbyists, and their allies such as the Minnesota Chamber of Commerce display a lack of candor about this reality and little or no sense of responsibility for the consequences of the proposed actions. Rather, they suggest a well-developed plan to "divide and conquer," based on promises of (short term) economic advantage and connected political pressure. the US Forest Service, the Corps of Engineers, the Minnesota Department of Natural Resources, the Environmental Protection Agency, and all other agencies concerned should exert themselves to ensure that the scope of the SDEIS is sufficiently broad to capture all impacts. They should resist political pressure and focus on carrying out their statutory and professional responsibilities.

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## SOO Statement of Opinion

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**Comment Number** LE 589-1

**Commenter Name** Melanie PetersonNafziger

**Comment** Dear committee making the decision regarding the future of the proposed Poly Met strip mine,

I am opposed to a land exchange that is meant to remove long standing environmental protections on Superior National Forest public lands against strip mining.

I am greatly concerned with the loss of wetlands; with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx, moose and wolf habitat as well as forests and open spaces.

Please do not allow a land exchange and facilitate the destruction of over 1000 acres of high quality wetlands and the Superior National Forest. These precious resources that belong to the people of the United States and Minnesota are more valuable as habitat and natural spaces than as a profitable development for a Canadian multinational mining company.

It is the obligation of the USFS to protect the land, air, water, animal and other natural resources of the public lands being proposed for exchange.

I am vehemently opposed to the establishment of a copper-nickel sulfide strip mine in Minnesota. This would be the largest permitted destruction of wetlands since the Saint Paul District of the Corps began permitting wetland fill.

Please do not allow it to happen.

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**Comment Number** LE 590-1

**Commenter Name** Richard Watson

**Comment** In the two years that I've attempted to gain some clarification on what is really going on with Non-Ferrous Mining in our region and after collecting volumes of information, I'm left with mostly questions, little clarification and considerable frustration. You on the other hand most probably have many more volumes than that of opinions on the matter and don't need me to offer you another, although that is the express purpose of this process. However, if I may I'll summarize my position and then ask you to help clarify my understanding or misunderstanding by answering the questions I have.

I am for any non-polluting business that we can bring to our region. The key is non-pollution and no further degradation of our environment. If that business could also then be a positive contributor to the health of the populace and region, all the better. Any public land exchange should weigh these factors heavily in determining what serves the public interest. The USFS should hold to a strict non-degradation policy. Multiple Use should not mean Multiple Abuse.

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## SOO Statement of Opinion

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**Comment Number** LE 590-2

**Commenter Name** Richard Watson

**Comment** Why are we considering a land exchange at this time, aren't we putting the cart before the horse?

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**Comment Number** LE 590-10

**Commenter Name** Richard Watson

**Comment** Until all these questions are answered in a manner that clearly delineates the real and significant advantage of the proposed land exchange to the public interest, I will be against the proposed land exchange. The multi-national corporations representing the Non-Ferrous mining industry are not the public and rarely, if ever, act in the public's interest. The USFS must!

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**Comment Number** LE 593-1

**Commenter Name** Mike Kemper

**Comment** I feel very strongly that, until these mining interests can show another production mining site with similar water issues, where the water resources have not been damaged by their activity; no supportive actions should be taken to accommodate their petitions to open business in Minnesota. We are not a test bed for destructive mining practices.

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**Comment Number** LE 594-1

**Commenter Name** Jeff Kopp

**Comment** Being a taxpayer in Minnesota and fully aware of the project and land exchange that the USFS is undertaking, I am in support of the personnel at the USFS and the professional position they are taking in addressing the issues for Minnesota. The high quality of land that will be received for us to use and enjoy will not only benefit humans but the animals that we coexist with.

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**Comment Number** LE 595-1

**Commenter Name** Dale Tranter

**Comment** Thank you in advance for considering my comments related to the above referenced issue. I trust that the Forest Service is taking a hard look at the ramifications of this proposed land swap and associated mining operation. As a practicing civil engineer and former Duluth resident, I am very concerned about the potentially devastating environmental degradation that could occur should this land swap and resulting mining operation be allowed to move forward. I have spent a portion of my nearly 40 year career working to permit various mining projects in Alaska. In addition I worked at several operating and closed mines in Montana. I have witnessed first-hand the large scale environmental degradation that can occur from poorly operated and or poorly closed copper mining operations.

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## SOO Statement of Opinion

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**Comment Number** LE 595-5

**Commenter Name** Dale Tranter

**Comment** I trust that you, as the Superior Forest Supervisor, will use all of the technical and legal resources at your command to ensure that a thorough and rigorous environmental review of the impacts of the proposed land swap are evaluated. If the land swap is subsequently approved, I also trust that you will ensure that extensive financial resources and engineering solutions are put into place to ensure that the PolyMet Mine does not cause environmental degradation for generations to come.

Please note that these comments are my personal comments only and that they are in no way meant to imply or to infer that they are those of my employer.

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**Comment Number** LE 596-1

**Commenter Name** D Crocker

**Comment** I oppose this big time! You are trying to destroy my National forest which has a negative effect on my state. You do not have the right to take this away from the people just to make a buck!!!!

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**Comment Number** LE 598-1

**Commenter Name** Karen Updegraff

**Comment** As Superior National Forest residents, we are concerned about the long-term health and integrity of the forest and its important surface waters. Minnesota enjoys some of the best water quality in the nation due in part to its rich natural endowment and in part to its rigorous efforts to protect those waters.

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**Comment Number** LE 598-5

**Commenter Name** Karen Updegraff

**Comment** The NorthMet land exchange is the thin end of a wedge. Once it is established that federal lands may be sacrificed to private development interests, there will be intense pressure for further exchanges. Therefore it is important that a very high mitigation bar be set to ensure the long-term integrity of federal ownership. We urge the USFS to carefully weigh the long-term consequences of this action, ensure that, at minimum, the exchanged lands meet the criteria listed above, as they proceed with this SDEIS.

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**Comment Number** LE 602-1

**Commenter Name** Frank Jeff Verito

**Comment** Is it true the area around the proposed mine site is already exploited? If so, as the map and the documentation suggest, a simple land exchange as proposed might sound reasonable; however, it's hard to tell because the large-scale maps do not discern land ownership other than the affected parcels. I'd assume the proposed acquisitions are in locations that would make those sections of National Forest more contiguous.

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## SOO Statement of Opinion

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**Comment Number** LE 602-3

**Commenter Name** Frank Jeff Verito

**Comment** Just about all the maps and images in the Heritage Resources packet are worthless. What a waste of paper! It's hard to comment intelligently on gibberish.

Companies may be entitled under archaic law to own mineral rights beneath a public surface; however, this ought not give them the right to exploit public resources to access those minerals. And no Forest Plan ought to give them that right either.

In the case of the Hiawatha and Ottawaforest plans, opposing public viewpoints were given no chance to impact the decisions made during the revision process. This has resulted in the current threats to those forests, as I assume is happening in SuperiorNF.

The proposed NorthMet mine appears about as filthy a mine as humanly imaginable, in one of the most scenic areas of the United States. No way can the public justify decimating over four square miles an area, that's increasingly desirable as a tourist destination, for an open air mine next to some of the Upper Midwest's most pristine terrain.

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**Comment Number** LE 602-4

**Commenter Name** Frank Jeff Verito

**Comment** Regardless of location, such a large installation would fragment the forest, spread NNIP, degrade the habitat for all resident wildlife, cause sedimentation and a loss of wetlands. Again the exchange might be wonderful if the plan weren't to obliterate the current Federal parcel.

Note that a "gain to the Federal estate," regardless of location, might not mean a whole lot if the plan isn't to exploit the currently-private parcels. The land is already there, assumingly in a natural-appearing condition.

Obtaining older forest habitat is more important to me than making exchanges which result in younger forest habitat. Too much of the areas of Superior National ForestI've visited is in a youthful condition at this time, which is a testimony to past mismanagement. Too much of our National Forests are managed for younger game species which benefit only a small percentage of the NF public ownership.

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## SOO Statement of Opinion

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**Comment Number** LE 602-5

**Commenter Name** Frank Jeff Verito

**Comment** My recommendation is to DISallow the mining operation and work on designing straight land exchanges on at least the tracts that would reduce the potential for fragmentation and make the federally-owned land more contiguous or enhance the environmental features (ie: Lake access, river access, outcroppings, etc...) Landowners may wish to exchange interior properties for ones at the forest edges that would provide them better fire protection and road access.

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**Comment Number** LE 605-2

**Commenter Name** Todd Wilson

**Comment** The US has been wasting tax-payer's money in Afghanistan, a country which has vast copper reserves; mine it there and show some return on this farce of a witch-hunt. Reclamation never returns the land to a "like it was" state. What we have will be worth much more to future generations when left as is then the destruction left by short-sighted greedy industrialists and their puppet politicians

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**Comment Number** LE 606-1

**Commenter Name** Cynthia Miller

**Comment** I am very opposed to this type of mining. I hope the powers that be can stop the drilling before more data is collected in regards to the environmental consequences of this type of mining. More research and public input is needed before further drilling. Please stop now.

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**Comment Number** LE 608-1

**Commenter Name** Cheryl Dannenbring

**Comment** I am horrified at the prospect of sulfide mining invading Minnesota's northland. After reading numerous articles on the subject, I implore the forest service to do all in it's power to stall these plans.

The trading off of large tracts of Superior National Forest land to the mining companies (in return for small parcels scattered here and there) goes against all environmental knowledge of what makes forest ecosystems viable. The fact that this is being done to facilitate the mining of heavy metals makes it abhorrent.

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## SOO Statement of Opinion

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**Comment Number** LE 608-3

**Commenter Name** Cheryl Dannenbring

**Comment** I believe by allowing the test drilling, the state is opening itself up to the much worse process of the mining itself. Thousands of acres of slurry ponds and tailings will replace the forests and wetlands that make our state a tourist and recreation mecca. If the general public was aware of the actual dangers, and was not being mollified by the self-serving rhetoric of the pro-mining interests, there would be outrage.  
In 10-20 years, when the damage is done and the state is left with irreversible damage, there will be public outcry. I am joining others in raising that alarm. I hope the forest service and our state and federal politicians will reverse their current positions and ban sulfide mining from Minnesota.

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**Comment Number** LE 610-1

**Commenter Name** Cheryl Dannenbring

**Comment** I am a Duluth resident writing in opposition to sulfide mining in Minnesota. Apparently a land-swap has been proposed, trading off large tracts of Ntl. Forest land to the mining interests in exchange for scattered parcels.

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**Comment Number** LE 610-4

**Commenter Name** Cheryl Dannenbring

**Comment** When the forest service has the power to refuse this land swap and protect the national forest land, the surrounding waters, and the whole future of our area, why would it choose to be a party to such short-term greed? I implore you to reconsider your position and keep our National Forest land in tact.

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**Comment Number** LE 611-1

**Commenter Name** Linda Glaser

**Comment** I live in Duluth and I am in complete opposition to sulfide mining in Minnesota. A land-swap trading off large tracts of Ntl. Forest land to the mining interests in exchange for scattered parcels would be extremely detrimental to wildlife, which needs large tracts of forest to survive.

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## SOO Statement of Opinion

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**Comment Number** LE 611-3

**Commenter Name** Linda Glaser

**Comment** In essence, we would be trading off one of the most pristine parts of the whole country for the profits of the mining interests.

When the forest service has the power to refuse this land swap and protect the national forest land, the surrounding waters, and the whole future of our area, why would it chose to be a party to such short-term greed? I implore you to reconsider your position and keep our National Forest in tact.

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**Comment Number** LE 613-1

**Commenter Name** Lisa Sander

**Comment** Sulfide Mining is nasty business that has had severe environmental costs in other states and is NOT tolerable in our beautiful state of MN especially in the lake superior watershed. There should be no question as to the quality of our water here in the Northland and no compromise in keeping it as clean as we can.

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**Comment Number** LE 614-1

**Commenter Name** Charlotte Hope Herold

**Comment** I live in Duluth, Minnesota and I am very concerned about sulfide mining. Please protect our forests and the watershed by opposing sulfide mining.

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**Comment Number** LE 615-4

**Commenter Name** LeRoy DeFoe

**Comment** Before you make any decisions, think of those generations, yet unborn, seven generations in the future. What will their world be like if this insanity is allowed to become a reality?

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**Comment Number** LE 617-1

**Commenter Name** Andrea Gelb

**Comment** Below is a copy of a letter circulating which I am very much in agreement with. For the last 31 years I have lived in Cook, Virginia and now in Duluth. I have aged and my values have not changed. They have only gotten stronger. While my "work" has been with people, I am very aware that without a healthy natural environment there is nothing that will sustain people

I am a Duluth resident writing in opposition to sulfide mining in Minnesota. Apparently a land-swap has been proposed, trading off large tracts of Ntl. Forest land to the mining interests in exchange for scattered parcels. This exchange would be extremely detrimental to wildlife, which needs large tracts of forest to survive, for instance the Lynx, a federally threatened species.

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## SOO Statement of Opinion

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**Comment Number** LE 617-3

**Commenter Name** Andrea Gelb

**Comment** When the forest service has the power to refuse this land swap and protect the national forest land, the surrounding waters, and the whole future of our area, why would it chose to be a party to such short-term greed? I implore you to reconsider your position and keep our National Forest in tact.

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**Comment Number** LE 619-1

**Commenter Name** Steven Garske

**Comment** This land exchange would surrender over 6,600 acres of pristine federal land for scattered, relatively small blocks of private land, for the sole purpose of allowing Polymet to turn this portion of the Superior National Forest into a massive sulfide-ore strip mine.

As a US citizen I am totally OPPOSED to this land exchange for a number of reasons.

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**Comment Number** LE 619-4

**Commenter Name** Steven Garske

**Comment** As graduate of UM-Duluth who spent much time in the Superior National Forest and the Boundary Waters, I know that northeast Minnesota is heavily dependent on the tourism and forest products industries. This mine will permanently damage both. Instead of pristine wetlands and perhaps some harvestable forests, the area will be turned into a moonscape, with toxic waste leaching to surrounding surface and groundwater.

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**Comment Number** LE 619-6

**Commenter Name** Steven Garske

**Comment** If these public lands can be traded away then National Forest lands across this country would potentially be vulnerable to privatization by wealthy and politically well-connected corporations. The fact that the USFS would be required to give up these lands because the level of destruction would be too great for them to legally permit such a mine should be evidence enough that this mine is a disaster in the making and should not be allowed to proceed.

This land exchange does NOT serve the long-term interests of the citizens of this country (who are its legitimate owners), and therefore should be DENIED.

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**Comment Number** LE 621-2

**Commenter Name** Marlene Pospeck

**Comment** The exchange not only helps Polymet achieve its goals of securing ownership of the surface rights above its mineral leases, it also allows the USFS to enhance outdoor recreation opportunities, conserve open spaces and create long term socioeconomic benefits.

This is truly a win-win-win... A win for the public, a win for Polmet, and a definite win for the USFS.

I appreciate the opportunity to voice positive support for the land exchange. It is vital to the continued economic growth of Minnesota's Iron Range.

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## SOO Statement of Opinion

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**Comment Number** LE 623-1

**Commenter Name** Betty Meados

**Comment** I have lived most of my life in northeastern Minnesota, and its wilderness and forest areas are its greatest assets. Please put protecting our wilderness and forest areas for us and future generations ahead of short-term economic interests.

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**Comment Number** LE 624-1

**Commenter Name** Carol Neumann

**Comment** I am very concerned about the environmental hazards attached to this type of project. Without a plan for the extensive pollution caused by this project, I do not believe it should go forward. Actually, I don't believe this projects outcome should compromise our forest, forest animals, water sources, (both lakes and rivers, as well as drinking water) or air. Mining is dirty business. We need to look ahead at what can jobs can be created with an environmentally sane policy. We cannot replace our air or water. We need to be preventative and stop this project now!

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**Comment Number** LE 625-1

**Commenter Name** Paul and Susan Schurke

**Comment** Like many Ely residents, we gave the Canadian company Polymet the benefit of the doubt when they promised us a new day for mining and a new way to "do it right." The Iron Range needs jobs and the world wants copper so it seemed the Polymet proposal was a dewdrop from heaven. Plus, they promised us that all our concerns would be answered in their Environmental Impact Statement.

But then their draft EIS was deemed unacceptable by our oversight agencies. They found a lot of devils in the details. And while most of the scientific and legal jargon in this 1,000-page report is beyond us, one of the details did catch our attention. On page 4.1-84, the report concedes that this project may leach toxins into our ground water for "over 2,000 years." How long does Polymet propose to deal with this problem? "45 years." What provisions are proposed for dealing with it after that? None.

Wow! What a confidence killer that revelation is on our hopes for this project. We just hope we're still lucid enough in 45 years to explain to our great grand children why they can no longer drink the water here.

"Over 2,000 years" is essentially forever. Some states prohibit mines that require such perpetual care. Other states require that such risky projects include financial assurance that covers treatment in perpetuity. Minnesota has neither of these safeguards in place. Yet we're being asked to be the guinea pig for a type of mining that has never been attempted by a company that has no mining experience.

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## SOO Statement of Opinion

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**Comment Number** LE 625-2

**Commenter Name** Paul and Susan Schurke

**Comment** Fortunately, federal oversight agencies acknowledge these concerns. They've required Polymet to revamp their EIS and find better ways of coping with acid-leaching mine tailings. Frank Ongaro, head of Mining Minnesota, notes that our state has such stringent environmental oversight in place that if there's a problem with this project, these agencies will catch it. He's right and they did. The EPA found that this project "will result in unacceptable and long-term water quality impacts."

Polymet has one more chance to "do it right." And so do we: as they prepare their supplemental EIS, let's insist that Polymet guarantee us that this project will not contaminate our ground and surface water. With the USFS now involved, we can send our concerns to our friends and neighbors at the Kawishiwi Ranger District office. As guardians of the world's most popular and beloved watershed wilderness, they are surely as concerned about these issues as we are. Just send a note to kawishiwi@fs.fed.us saying, "Please ensure that the proposed mining projects do not pollute our watershed."

Yes, Ely needs jobs and the world wants copper. But we're not desperate enough yet that we'd risk the health of our great grandchildren in exchange for that...are we?

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**Comment Number** LE 632-1

**Commenter Name** Brian Pietsch

**Comment** I understand the importance of economic development for the state and the creation of jobs in a down economy. However, there are too many unknowns about the long-term environmental impacts of the mining project and we have to put the health of our state and the environment above short-term pushes for profit from an industry that has been less than honest in the past.

I respectfully ask that this project be denied approval.

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**Comment Number** LE 633-1

**Commenter Name** Kate Seitz

**Comment** I do not support this Land Exchange.

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**Comment Number** LE 634-1

**Commenter Name** Carol Figeroid-Burgi

**Comment** I have had the privilege of spending time in the area concerned and I am disappointed that such a land exchange promoted with the specific intention of bypassing environmental protection would even be considered. It is a national responsibility to protect the wild places still left and to prevent big business from putting profits ahead of the public good that the protection of these wild places with their precious flora and fauna.

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## SOO Statement of Opinion

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**Comment Number** LE 637-1

**Commenter Name** Joshua Houdek

**Comment** This loss of habitat for moose, wolves, and most importantly the lynx (a threatened species) is unacceptable.

Exchanging federal lands for strip mining is a bad practice.

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**Comment Number** LE 638-1

**Commenter Name** Unknown

**Comment** Just wanted to express concerns about the very edge of the boundary waters and the horrible tragedy to risk losing such a national treasure to mining by a company with no previous mining track record.

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**Comment Number** LE 638-3

**Commenter Name** Unknown

**Comment** If the state loses this area, it would seem a huge loss of revenue through tourism as well. Please consider carefully as nature bats last. Thank you.

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**Comment Number** LE 639-1

**Commenter Name** Carol Berg

**Comment** Pristine--or nearly pristine--land is at a premium. We do not need more defacing of our earth!

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**Comment Number** LE 640-1

**Commenter Name** Michelle Gobely

**Comment** I completely oppose this!!! Leave MN's precious National Forest land alone!!! We don't need more mining in this country, we need alternative energy. Also, the wildlife in this great State are struggling to survive with loss of land to private owners, we need to protect this land for wildlife and all people. Thanks but NO THANKS!!!

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**Comment Number** LE 641-1

**Commenter Name** Beth Robelia

**Comment** After so many years of working to stop acid rain you are going to sacrifice acres of national forest to allow it?

I realize northern Minnesota needs jobs but lets focus on cleaner alternatives. Please follow Wisconsin's lead and ban this type of mining until it can be proven safe.

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## SOO Statement of Opinion

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**Comment Number** LE 642-1

**Commenter Name** Rob Davis

**Comment** Given that we are already dealing with the adverse affects of climate change on habitats and wildlife, I cannot believe that the USFS would deliberately allow the destruction of 1000 acres of pristine wilderness habitat.

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**Comment Number** LE 644-2

**Commenter Name** Betty Meados

**Comment** I have lived most of my life in northeastern Minnesota, and its wilderness and forest areas are its greatest assets. Please put protecting our wilderness and forest areas for us and future generations ahead of short-term economic interests.

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**Comment Number** LE 645-1

**Commenter Name** Bruce Truckey

**Comment** And what happens when it leaks into Lake Superior and it will.  
Does profit trump survival?  
The wars of the future won't be about energy. They will be about safe drinking water.  
  
You mess with Lake Superior you mess with humanity.

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**Comment Number** LE 646-1

**Commenter Name** David Moffatt

**Comment** This type of mining has never been conducted anywhere without massive amounts of toxic waste being left behind. It seems highly unlikely that Polymet will be the first to do otherwise.

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**Comment Number** LE 648-1

**Commenter Name** Siri Simons

**Comment** I have lived in Minnesota for 20 years and see our waters, forests, and wildlife as a unique and important characteristic of our state. During the summer, I enjoy spending time on the Superior Hiking Trail, and would hate for this beautiful forest suffer from the impacts of unnecessary mining.

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## SOO Statement of Opinion

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**Comment Number** LE 650-1

**Commenter Name** Jill & Jeff Boogren

**Comment** This land exchange would enable the destruction of thousands of acres of the Superior National Forest, including over 1000 acres of wetlands that are important to the whole forest ecosystem.

This will have a detrimental impact on water quality and remove critical habitat for sensitive wildlife species, including lynx and moose.

Our National Forests were put in place to protect the land, water and wildlife for future generations. First and foremost we should be responsible stewards of this land. We must not trade it away for the benefit of multinational mining companies.

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**Comment Number** LE 651-1

**Commenter Name** Joshua Houdek

**Comment** This loss of habitat for moose, wolves, and most importantly the lynx (a threatened species) is unacceptable.

Exchanging federal lands for strip mining is a bad practice, and a bad deal for the preservation of critical habitat and open space in this area.

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**Comment Number** LE 652-1

**Commenter Name** David Miller

**Comment** There is indisputable evidence that access to clean water in the near future will become more and more restricted for the vast majority of humanity. This water crisis is already being experienced many places around the globe.

We need clean water to live healthy and rewarding lives. High-sulfide mining has proven to be a destroyer of water for generations in the areas where it has been employed.

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**Comment Number** LE 653-1

**Commenter Name** Kyle Haight-Nali

**Comment** Please help preserve and save our Planet Earth! We only have one, and we shouldn't ruin it! We have done enough harm, so please help save the animals, forests, people, and land.

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**Comment Number** LE 654-1

**Commenter Name** Chip Borkenhagen

**Comment** We live in this state because of its natural resources. Please consider this!!!

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## SOO Statement of Opinion

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**Comment Number** LE 655-1

**Commenter Name** Sandy Dvorsky

**Comment** Don't do it.

Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves. Their margin for survival is under assault from almost every existing human demand. Draw the line here and rejected this Land Exchange. Thank-you.

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**Comment Number** LE 656-1

**Commenter Name** Shirley Huskins

**Comment** Within the last month, October 2010, I have seen first hand the residue, a yukky orange stream of water bubbling up from the ground and running in a continuous stream. This is the result of such mining done decades ago, and is adjacent to Spruce Road, and federal forest land in NE Minnesota. Are we to subject our environment to more of such devastation?

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**Comment Number** LE 657-1

**Commenter Name** Bonnie Meyer

**Comment** More than 90% of our wetlands are already gone thanks to the Army Corp of Engineers who care little about habitat and future generations. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves plus every other creature who makes this place home.

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**Comment Number** LE 658-1

**Commenter Name** Karen Mazza

**Comment** I don't need to go into detail about the effects of this proposed mine. I'm sure others have and will. What do you want for your grandchildren?

Have you ever seen a strip mine? I have. I lived in Montana for a number of years. Visit one and then visit the land we are talking about.

No one can do that and honestly think this would be a benefit to our state and our future.

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**Comment Number** LE 659-1

**Commenter Name** Ivan Zenker

**Comment** Bad Idea! Ever drive by Sudbury, Ontario, Canada? If you had there would be no way this would even be considered. It looks like the moon!!!!

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## SOO Statement of Opinion

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**Comment Number** LE 660-1

**Commenter Name** Jacqueline Bartosh

**Comment** I oppose this land exchange. PolyMet shouldn't be allowed to destroy the land 'we the people' own so it can make a profit. Allowing such an act is just another example of government and big business snuggling up too close. For the safety and health of NE Minnesota's beautiful environment, please stop this land exchange.

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**Comment Number** LE 661-1

**Commenter Name** Christopher Ahalt

**Comment** It's this kind of short-term thinking that is inherently wrong with our society and with our politicians.  
Why would we want to destroy one of the last real natural wonders of our state to mine for something that will only benefit a small fraction of people?  
It's this kind of raping of our environment that our children will have to deal with and wonder why we did it.  
Please do not allow this strip mining to occur. I want to be able to take my kids up to the northshore and the boundry waters and show off the beauty of our state. Some things are more important than employing a few people. Make the right choice and ban this type of mining and tell PolyMet to go away!

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**Comment Number** LE 663-1

**Commenter Name** herbert davis

**Comment** Why can't we follow the lead and experience of Wisconsin?

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**Comment Number** LE 664-1

**Commenter Name** Mikanuk "Larry D. Adams"

**Comment** In my best estimation, please note that this proposed Polymet Land Exchange does not have my approval, as a constituent of Minnesota. I'm vehemently opposed to any type of mining occurring in Northern Minnesota, near Lake Superior and the Boundary Waters.

Also, why not develop this land with eco-friendly options, such as wind turbines, solar collectors and other viable "Green" technologies? Thank you for this opportunity to speak up not only for our environment but for all of the animal species that thrive and need to survive in this particular area.

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**Comment Number** LE 665-1

**Commenter Name** Paul Greenblatt

**Comment** I am also am extremely concerned about contamination of ground water. The pollution of waters with cooper and nickel sulfides could have devastating effects on both humans and wildlife that will be very difficult to reverse. Let us not act out of haste and recognize all the impacts before making final decisions!!

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## SOO Statement of Opinion

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**Comment Number** LE 666-1

**Commenter Name** Shawn Hubert

**Comment** Our future depends on clean air and water. Please do not award this permit to PolyMet.

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**Comment Number** LE 667-1

**Commenter Name** Mary Marcan

**Comment** Living in West Virginia recently gave me a view and a dread of the mining control of land by power (and money) seeking companies who see only those objectives, rather than the destruction and desolation which follows their practices. We lived in constant fear of the breaking of a 'sludge' pond (pond??? -- millions of TONS of it!), and the reality that there was no means of escape but to TRY to run up the mountain! Now even the mountain tops are going!!! When will we awake to the situation our beloved country is coming to??? PLEASE take some action, not only for northern MN, but for all the places (may I mention the Gulf?) where greed continues to control the decisions made regarding the earth.

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**Comment Number** LE 668-1

**Commenter Name** Kelli Cool

**Comment** We are the land of 10,000 lakes, we should not compromise any of our waterways for this type of mining which has not been proven safe anywhere, and should not be allowed to happen in our northwoods. I am a formerly from the Iron Range, and I spend a lot of time up and around that area, I don't want my natural areas spoiled. No PolyMet!!!

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**Comment Number** LE 669-1

**Commenter Name** Chrissy Marty

**Comment** Please take these concerns seriously and know that if the Land Exchange is approved there will be many long-term consequences that will negatively affect our environment, animal population, and human recreation opportunities.  
Thanks

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**Comment Number** LE 670-1

**Commenter Name** Glenn Cool

**Comment** We are the land of 10,000 lakes, we should not compromise any of our waterways for this type of mining which has not been proven safe anywhere, and should not be allowed to happen in our northwoods. I am a formerly from the Iron Range, and I spend a lot of time up and around that area, I don't want my natural areas spoiled. No PolyMet!!!

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## SOO      Statement of Opinion

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**Comment Number** LE 671-1

**Commenter Name** Steve Vincent

**Comment** This land exchange is clearly in the best interests of the patrons of the Superior National Forest and the BWCA Wilderness. It will add vast acres of habitat and wetlands to the national forest lands. For Polymet Mining it solves the last remaining issue to permitting and opening their mine.

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**Comment Number** LE 671-3

**Commenter Name** Steve Vincent

**Comment** The only negative I see is the time the SDEIS and the final EIS will take.

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**Comment Number** LE 672-1

**Commenter Name** Alan Olander

**Comment** Thank you for considering my views.

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**Comment Number** LE 673-1

**Commenter Name** Sandra Rathjen

**Comment** This is unacceptable for any reason.

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**Comment Number** LE 674-1

**Commenter Name** Jerry Schedin

**Comment** It is bad enough that you allow them to clear cut all our national forests, but strip mining is going way too far, please do all you can to prevent this tragedy from happening to our forests.

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**Comment Number** LE 675-1

**Commenter Name** Kristin Tuenge

**Comment** This area is the gem of Minnesota and one of the reasons why people continue to live and visit Minnesota. Please don't allow this..When it's gone it is gone for us and future generations.

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## SOO Statement of Opinion

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**Comment Number** LE 676-1

**Commenter Name** Bennett Siems

**Comment** For many of us in Minnesota, the Superior National Forest region is sacred ground, as it has been to the Dakota and Ojibwe peoples for millennia. There are scientific arguments in abundance showing beyond any reasonable doubt that the proposed land swap would be destructive and pay no long-term benefits to the Minnesotans who love this land. But beyond all that, know this: If you let this land swap happen and the mine come into being, you will be razing my church, and the church of many spiritual people in this beautiful state. Imagine taking a wrecking ball to a cathedral. If you can live with that image, then I guess you can live with the destruction you'll be causing by letting this land swap occur.

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**Comment Number** LE 678-1

**Commenter Name** Ruthann Yaeger

**Comment** Please don't sell our natural heritage and future health for a few jobs and a great profit to a Canadian company with little or no incentive to care for our land or our health!

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**Comment Number** LE 679-1

**Commenter Name** Karen Kinnard

**Comment** this is why we have laws to protect the land. keep mining out!

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**Comment Number** LE 680-1

**Commenter Name** Barb Bower

**Comment** It's time that we as a country put the environment before profit. We need to change our destructive behaviors before it is too late.

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**Comment Number** LE 681-2

**Commenter Name** Patricia Holmes

**Comment** I am appalled that if approved, this project, the largest permitted destruction of wetlands since the Saint Paul District of the Corps began permitting wetland fill, will permanently defile our state's resources in exchange for some jobs that will be short-lived and will disappear once the mining is finished. I understand from research I've done on this project that the sulfide pollutants can persist for decades as the waste piles are exposed to water and oxygen.

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## SOO Statement of Opinion

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**Comment Number** LE 682-1

**Commenter Name** Robin Vora

**Comment** I may not know enough about the details of the project, but on the surface I am not so sure that restricting surface mining is a bad idea. I am concerned about the bigger picture environmental effects of all mining proposed in northeastern Minnesota. I believe a thorough cumulative effects analysis should be done before proceeding with this project. What are the overall impacts on watersheds, water quality and water quantity?

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**Comment Number** LE 682-6

**Commenter Name** Robin Vora

**Comment** I own properties in northern St. Louis County, stay there part of the year, and am concerned about environmental degradation, and loss of natural habitats and public lands. I would appreciate it if the public agencies would address my concerns in the environmental analysis process and documents, and fully evaluate if this proposed exchange is really a good idea, and a good deal for the public and the environment in the long-term.

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**Comment Number** LE 685-1

**Commenter Name** Lyn Clark Pegg

**Comment** This is not sustainable development and therefore the promised jobs are not sustainable. Our region needs to move beyond the short-term profits of mining and extraction and toward eco-friendly, green and clean industries. We can do better than this proposal!

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**Comment Number** LE 686-1

**Commenter Name** Debra Hoffman

**Comment** I vacation in this area every summer with my family and have come to love and appreciate this wonderful area of our state. Unfortunately, the moose population has declined since we began coming up here almost twenty years ago. We should not add to the destruction caused by wind and fire in this region by causing destruction ourselves.

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**Comment Number** LE 688-1

**Commenter Name** Gael Zembal

**Comment** I cannot in good conscience stand by and watch the destruction of a part of my beautiful state--please do not allow this loss of natural hertiage to happen! I do not want to give future generations a sick, degraded world to live in, nor do I want to live in that world myself; this is what would happen if we allow this mine to be opened.

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## SOO Statement of Opinion

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**Comment Number** LE 689-1

**Commenter Name** Jeff Hazen

**Comment** Once pristine natural areas are destroyed they cannot be created by human actions. To pretend to offer a substitute is like saying that you can replace a deceased loved one with another human being of some sort. It's a cruel and transparent shell game where the "winners" are monied interests playing with living things as though they were playing Monopoly.

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**Comment Number** LE 690-1

**Commenter Name** Tom Donaghy

**Comment** Keep their poison out of the Boundary Waters!

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**Comment Number** LE 691-1

**Commenter Name** Christina Harrison

**Comment** The USFS has been given the responsibility to protect these lands from commercial exploitation and environmental degradation. Their preservation is not just a regional but also a national concern! Please exercise the power you, as an agency, has been given to keep these lands in public ownership and under your protection!!!

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**Comment Number** LE 692-2

**Commenter Name** Pat Owen

**Comment** If this is just something they SAY they can do, and have never actually done it, I would turn their request down. Minnesota's natural resources are too precious to be a guinea pig.

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**Comment Number** LE 693-1

**Commenter Name** Dyke Van Etten Williams

**Comment** Please know that I am opposed to any accommodation given to Polymet for any of their efforts in Minnesota. There is still absolutely no history nor reason to believe that they can mine sulfides safely. Given the many other outdoor things that have gone wrong with storm, fire, mining, etc., we can be sure the law of unintended consequences will apply here in this much more dangerous situation and make this mining a major natural disaster. Please do not exchange land with them. Please do not approve any permits and do not ease their way in any fashion.

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## SOO Statement of Opinion

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**Comment Number** LE 694-1

**Commenter Name** Bill Higgins

**Comment** I am writing to urge you to support the land swaps as proposed by Polymet. I ask you to support this for the greater good of Northern Minnesota as well as the greater good of our State and our Country. I own lake property across the road from the proposed Polymet project on Wynne Lake and your decision is definitely in my back yard. If I felt Polymet posed a risk to our lakes and air quality I would stand opposed. Instead I know many of the individuals responsible for the Polymet operation and have complete faith and trust in their abilities and intentions. I trust them to be good stewards of this valuable natural resource.

I believe the vast majority of mostly silent local citizens strongly support the land swap as proposed by Polymet. I also believe that the vocal minority opposed to the land swap is not so silent. Please help this Polymet project become a reality and lend your support to the proposed land swap.

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**Comment Number** LE 695-1

**Commenter Name** Pat Hippert

**Comment** I am greatly concerned with the loss of wetlands and the loss of the "one hundred mile swamp;" with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx critical habitat. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves. Furthermore, my great-grandchildren live in northern Minnesota and I don't want something like this being built in their area. I want them growing up in an area where the air is pure ;and they can enjoy real nature.

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**Comment Number** LE 696-1

**Commenter Name** Ben Hinz

**Comment** I would like the state to receive at least 10,000 acres in exchange for the 6,650 we plan to let PolyMet ruin. This would, at the very least, offset the additional acreage that will invariably be negatively impacted by the copper mining practices planned. While not against mining itself, I do oppose mining in sensitive areas such as this and have no confidence in state nor federal agencies to monitor these efforts ongoing. Good luck turning Babbitt into the next Butte. I hope you are all sleeping well and have no plans for your children nor grandchildren to enjoy Northern Minnesota in the future.

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**Comment Number** LE 697-1

**Commenter Name** Janie Huhta

**Comment** We need to think of our environment for a change instead of big business. We have been taking life habitat away from many species for long enough. Please stop this.

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## SOO Statement of Opinion

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**Comment Number** LE 698-1

**Commenter Name** Daniel Vincent

**Comment** The damage is not worth the "gain" that we would receive from allowing this mine to exist in our state. The effects will last longer than my children will live and that is something I will not accept, especially when it profits a handful of people only. Not to mention people not even from this country/state....

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**Comment Number** LE 699-1

**Commenter Name** Barry W. Tungseth

**Comment** For the record, I live off the Fernberg Road about 6-8 miles east of Ely. I am TOTALLY AGAINST any land exchange from the Forest Service to PolyMet.

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**Comment Number** LE 699-4

**Commenter Name** Barry W. Tungseth

**Comment** NO, NO, NO is the only possible answer to a REAL long range plan for economic security in this [the Ely and surrounding area] region. For a simple 20 year gain, we lose the land the public now uses?

Again, I express my total lack of support and trust, to a company that will destroy this beautiful country of the Superior Forest, and create the bigger future eyesore of another mine.

NO is the only answer for the future generations of our people.

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**Comment Number** LE 700-1

**Commenter Name** Alan Nikolai

**Comment** I say no to such an exchange of land. I do not want toxic waste generated in MN as that is exactly what this type of mining will provide---polluted water and we tax payers having to foot the bill in the long run. Stop it now in its tracks before it goes any further by denying the land exchange.

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**Comment Number** LE 701-1

**Commenter Name** Cathy Geist

**Comment** As an environmental science instructor, I am especially concerned about the harmful ecological effects on the wetlands of the area, as well as the habitat for lynx and other species in need of protection.

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**Comment Number** LE 702-1

**Commenter Name** Susan Imker

**Comment** As a Minnesota resident, this especially concerns me. I am concerned with the potential negative impact on Lake Superior and the Boundary Waters. Wisconsin has banned this type of mining until more information about the impact is known, and Minnesota ought to do the same.

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## SOO Statement of Opinion

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**Comment Number** LE 704-7

**Commenter Name** John Roth

**Comment** So given these criteria, how does the proposed PolyMet exchange stand? In my opinion, it may satisfy criteria one through four, but fails miserably on the fifth and sixth criteria.

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**Comment Number** LE 862-1

**Commenter Name** Patricia Ward

**Comment** Please preserve the untarnished beauty of Boundary Waters.

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**Comment Number** LE 863-1

**Commenter Name** Kiersten Ruda

**Comment** I also feel a personal connection to this land--every summer I go on a camping trip in the Boundary Waters. I am always amazed at the beauty of the region, and it is an integral part of my life to experience the simple yet miraculous lifestyle while staying in the Boundary Waters. Allowing strip mining would take away the opportunity for me, you, and future generations to feel the profound experience of enjoying the Boundary Waters.

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**Comment Number** LE 866-1

**Commenter Name** Kate Crowley

**Comment** This type of mining has time and time again been shown to harm the environment long term. The DNR should be doing everything possible to protect this land, not selling out to polluters.

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**Comment Number** LE 867-1

**Commenter Name** Richard Collman

**Comment** I have hiked in this area and love the Superior National Forest as well as the Superior Hiking Trail. I cannot understand jeopardizing any of this area for the sake of commercial interests.

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**Comment Number** LE 868-1

**Commenter Name** Anthony Shields

**Comment** The evidence is here, please use it while making your decision.

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**Comment Number** LE 869-1

**Commenter Name** Stan And Nancy Partin

**Comment** We have already sacrificed our coastal waters for the benefit of British Petroleum. Let us not make the same mistake with our precious Boundary Waters and Canadian Polymet. If they insist on mining, let them find a place far from the U.S. border to do so.

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## SOO Statement of Opinion

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**Comment Number** LE 870-1

**Commenter Name** John Viacrusis

**Comment** We can't afford anymore loss of wildlife. The wetlands need to be protected from further damage due to mining.

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**Comment Number** LE 871-1

**Commenter Name** Rick Dahn

**Comment** The Superior National Forest is in my back yard. I will do all I can to preserve this wilderness.

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**Comment Number** LE 872-1

**Commenter Name** Richard Worm

**Comment** I have backtracked both the entire Superior Hiking Trail and the entire Border Route Trail (much of it in the BWCA) along the Canadian/Minnesota border. I've also taken several canoe trips (one a portage trail maintenance service trip with Wilderness Volunteers) in the BWCA. Such a land "exchange" in that region seems out of character and not in the best interests of the land to be destroyed and the nature of the wildlife habitat and related surroundings.

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**Comment Number** LE 872-2

**Commenter Name** Richard Worm

**Comment** I am very skeptical that benefits outweigh the negatives on this project. How do you treat all this water that gets used? How do you prevent the pollution of water in general? In a land exchange you seldom get better land than what is destroyed. And many times, the proposal fails to include the loss of other lands: to wit: land for railroad loading sidings, additional roads and added traffic lanes and secondary roads to the site.

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**Comment Number** LE 873-1

**Commenter Name** Catherine Mosher

**Comment** We cannot trade Minnesota's wild places for mining operations. They are too precious to lose.  
Please, look to the future and say no to this.

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**Comment Number** LE 876-1

**Commenter Name** Frank Broderick

**Comment** We must prohibit the fouling of the water in the Arrowhead country.

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 001-3

**Commenter Name** Larry Adams

**Comment** In addition to opposing the Land Exchange, I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 009-9

**Commenter Name** Wanda Ballentine

**Comment** It includes thousands of acres of high quality wetlands and habitat for endangered species such as the Canada lynx and the gray wolf

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**Comment Number** LE 063-4

**Commenter Name** Kristin Larsen

**Comment** The County Biological survey has not yet been completed in St. Louis County. We need this to be complete prior to even contemplating any further exchanges in the area. The survey must be done by the official and properly supervised team that does the official surveys for the Minnesota Department of Natural Resources in order to have credibility. A least 11 species of botrychium have been found, over 20 species of endangered, threatened or special concern plants will be impacted by the proposed use of the land to be exchanged. The 100 mile Swamp and the many fens in the area are threatened - some of which have yet to be even given preliminary study. The idea is presented that in coming decades more habitat will be present for these species, this idea borders on the absurd.

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**Comment Number** LE 070-2

**Commenter Name** Janice Greenfield

**Comment** I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 148-2

**Commenter Name** Margot Monson

**Comment** Specifically, the impact on natural resources includes the loss of wetlands, the pollution of the lakes, rivers, and ground water of the region of the Lake Superior watershed and BWCA from acid mine drainage and leaching of toxic metals, as well as the threat to endangered species, and the degradation of tribal lands by its impact on wild rice stands, fisheries, and estuaries. An ecosystem that has evolved over eons cannot be truly restored to its original condition nor function,

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**Comment Number** LE 227-8

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis, of cumulative impacts of the land exchange to regional Threatened, Endangered, and Sensitive Species, including habitat connectivity, such a those done in technical documents related to the DEIS.

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## **TES            Threatened, Endangered, and Special Status Species Issues**

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**Comment Number** LE 282-26

**Commenter Name** Paula Maccabee

**Comment**            The Feasibility Analysis also seems to assume that because the 6,650 acres of Federal land demanded by PolyMet are located near other lands that have been degraded by mining these lands are “chiefly valuable for non-National Forest System purposes.” (Feasibility Analysis, Section 1, p. 3). This is irresponsible from an ecological point of view. The PolyMet DEIS documents that the Federal land on which its mine would be located provides one of the few remaining corridors for endangered species, including the gray wolf and the Canada lynx, the movements of which have been restricted due to the cumulative impacts of other nearby mining projects. (PolyMet DEIS, pp. 4.4-31 to 4.4-33)

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 282-34

**Commenter Name** Paula Maccabee

**Comment**

**WILDLIFE/ENDANGERED SPECIES**

□ Record of Decision: “The Revised Plan affords special attention to the conservation of bald eagle, gray wolf, and Canada lynx and the habitats upon which they depend. . . incorporation of conservation measures into the Revised Plan, helped lead to the Fish and Wildlife Service’s concurrence that implementation of the Revised Plan would not adversely affect the bald eagle or critical habitat for gray wolf. It also helped lead to a Fish and Wildlife Service Biological Opinion that issued the finding that implementation would not jeopardize the continued existence of the gray wolf and Canada lynx on the Superior National Forest.”<sup>15</sup>

□ Desired Condition: “Contribute to the conservation and recovery of federally-listed, proposed, or candidate threatened and endangered species and the habitats upon which these species depend.” (Forest Plan, D-WL-3(c), p. 2-27)

□ Desired Condition: “Provide structure, composition, connectivity, function, and spatial patterns of aquatic and terrestrial habitats that maintain or restore opportunities for species to interact, disperse, and migrate and to reduce negative impacts associated with forest habitat fragmentation.” (Forest Plan, D-WL-3(h), p. 2-28)

□ Objective: “Maintain, protect, or improve habitat for all threatened and endangered species by emphasizing and working toward the goals and objectives of federal recovery plans and management direction in the Forest Plan. (Forest Plan, O-WL-4, p. 2-29)

□ Objective: “Promote the conservation and recovery of Canada lynx and its habitat.” (Forest Plan, O-WL-8, p. 2-29)

□ Objective: “Maintain and, where necessary and feasible, restore sufficient habitat connectivity to reduce mortality related to roads and to allow lynx to disperse within and between LAUs [lynx analysis units] and between LAUs and Boundary Waters Canoe Area Refugium on NFS land.” (Forest Plan, O-WL-11, p. 2-29)

□ Guideline: “Within LAUs on NFS land, moderate the timing, intensity, and extent of management activities, if necessary, to maintain required habitat components in lynx habitat, to reduce human influences on mortality risk and inter-specific competition, and to be responsive to current social and ecological constraints relevant to lynx habitat.” (Forest Plan, G-WL-1, p. 2-30)

□ Guideline: “Limit disturbance within each LAU on NFS land as follows: if more than 30% of the total lynx habitat (all ownerships) within an LAU is currently in unsuitable condition, no further reduction of suitable conditions should occur as a result of vegetation management activities by the National Forest. (Forest Plan, G-WL-3, p. 2-30)

□ Standard: “Management activities on NFS land shall not change more than 15% of lynx habitat on NFS land within an LAU to an unsuitable condition within a 10-year period.” (Forest Plan, S-WL-1, p. 2-30)

□ Objective: “Maintain, protect, or improve habitat for all sensitive species.” (Forest Plan, O-WL-18, p. 2-31)

□ Guideline: “Avoid or minimize negative impacts to known occurrences of sensitive species. (Forest Plan, G-WL-11, p. 2-31)

□ Guideline: “Within northern goshawk post-fledging areas, minimize activities, to the extent practical, that may disturb nesting pairs during critical nesting season (March 1– August 30) and, to the extent practical, within a 500 acre area encompassing all known nest areas within the territory: Maintain suitable habitat conditions on a minimum of 60% of the upland forested acres in post-fledging areas. Suitable habitat: jack pine and spruce/fir forest types >25 years and all other forest types >50 years with semi-closed to closed canopy (>70%).” (Forest Plan, G-WL-22, p. 2-35).

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 282-47

**Commenter Name** Paula Maccabee

**Comment** The Feasibility Analysis glosses over impacts of the PolyMet Land Exchange on threatened, endangered and sensitive species and habitat. The Feasibility Analysis acknowledges that the Federal lands contain two state endangered, two state threatened and nine state plant species of special concern, and that nine of these species are also Forest Service sensitive species and admits that the non-Federal lands have not been surveyed much. Without identifying the specific plant species on the Federal land, let alone whether the same species are found on the non-Federal land, the Feasibility Analysis represents, “There would likely be no net change of plant species of special concern to the Federal estate.” (Feasibility Analysis, Species and Habitat Section 8, p. 2-1).

This is an irresponsible statement. The PolyMet DEIS explains that the Project would result in direct impacts to the following plant species that are endangered, threatened or of special concern: Prairie moonwort (*Botrychium campestre*), pale moonwort (*B. pallidum*), least grapefern (*B. simplex*), neat spikerush (*Eleocharis nitida*), lapland buttercup (*Rununculus lapponicus*), clustered burreed (*Spartinum glomeratum*), and Torrey’s manna-grass (*Torreyochloa pallida*). (DEIS, p. S-10, pp. 4.3-5 to 4.3-9) and indirect impacts to the following plant species that are endangered, threatened or of special concern: pale moonwort (*B. pallidum*), ternate grapefern (*B. regulosum*), least grapefern (*B. simplex*), floating marsh mallow (*Caltha natans*), neat spikerush (*Eleocharis nitida*), lapland buttercup (*Rununculus lapponicus*), and clustered bur-reed (*Spartinum glomeratum*). (DEIS, pp. S-10, 4.3-5 to 4.3-9).

For one particular state endangered species, the floating marsh marigold (*Caltha natans*), the PolyMet Land Exchange would create a certain net loss. There are only 12 known populations of *Caltha natans* in the state of Minnesota. Five of these -- 42 percent of the *Caltha natans* population in the State -- occur on or near the PolyMet mine site and may be indirectly impacted by changes in hydrology, chemistry or other disturbance at the mine. (DEIS, p. 4.3-15, Table 4.3-9). The remaining populations of this endangered plant are located near the mine site along the Partridge River. (DEIS, p. 4.3-16). Even if some other species may be located there, the non-Federal land would provide no protection for *Caltha natans*. Similar net losses may apply to other species as well.

The Feasibility Analysis similarly claims, despite contrary evidence that “There would likely be no net change of animal species of Federal concern to the Federal estate.” (Feasibility Analysis, Species and Habitat Section 8, p. 2-1).

The Feasibility Analysis acknowledges that the PolyMet Land Exchange would result in a net loss of 521 upland acres to the Federal estate, with a net loss of young mature and mature forest habitat. (Feasibility Analysis, Species and Habitat Section 8, p. 2-2). It admits, “Young mature and mature upland habitat is important to several TES [threatened, endangered, special concern] wildlife species, including northern goshawk, owls, other cavity nesting birds, and bats,” but then adds that with proper management uplands on the non-Federal parcels “should provide mature forest habitat within 20 to 40 years.” (Feasibility Analysis, Species and Habitat Section 8, p. 2-2). However, if a species is endangered, threatened or of special concern, restoration of habitat in a remote location in 20 or 40 years is clearly irrelevant to its survival.

The Feasibility Analysis appears to conclude that the PolyMet Land Exchange would create no net impacts on federally listed Canada lynx and gray wolf since both species have been found within a mile of Federal and non-Federal lands. (Feasibility Analysis, Species and Habitat Section 8, p. 2-1). The Feasibility Analysis does not discuss the fact that Federal lands are designated critical habitat and provide wildlife corridors for lynx and wolf in an area where few wildlife corridors remain. This information is readily available in the PolyMet DEIS, which states that portions of the PolyMet mine site are federally designated lynx critical habitat (DEIS, pp. 4.4-2, 4.4-3) and that the site is located within Zone 2 of the designated critical habitat for the



## TES Threatened, Endangered, and Special Status Species Issues

Gray Wolf. (DEIS, p. 4.4-3). Cumulative impacts of the PolyMet Project and other mining and related actions have the potential to eliminate all but three of the 13 wildlife corridors identified by researchers as critical to species in the area, including wolf and lynx. (DEIS, pp. 4.4-31 to 4.4-33).

**Comment Number** LE 282-54

**Commenter Name** Paula Maccabee

**Comment** ☐ Assessment of the biodiversity and habitat characteristics of all Federal and non-Federal lands including, but not limited to the following:

- o Biodiversity of plant species, including identification of native and non-native plants and the existence of invasive species;
- o Plant species on the lands that are rare, threatened, endangered or of special concern, specifying for any such plant species the percentage of that species located on and near the Federal or non-Federal lands as compared to the entire population in Minnesota and in the Superior National Forest;
- o Animal species that are rare, threatened, endangered or species of special concern using the Federal or non-Federal lands as habitat, specifying for any such animal species whether the lands are critical habitat and the characteristics of the land that make it suitable habitat for the specified species;
- o The degree to which the Federal or non-Federal or non-Federal land has been used as a wildlife corridor for endangered species and the degree to which adjacent developments and degradation of land have reduced the number of wildlife corridors available in the immediate geographic area;
- o The specific Forest Service lynx analysis units (LAU) within which the Federal and non-Federal land are located, and for each such LAU (all ownerships) the acreage of the LAU and the percentage of that LAU which is currently in unsuitable condition for lynx habitat.

**Comment Number** LE 282-62

**Commenter Name** Paula Maccabee

**Comment** ☐ Impacts on plant species that are rare, endangered, threatened or of special concern, including the percentage of plant communities affected as compared to total Minnesota populations and total populations within the Superior National Forest and the degree to which such plant species are or are not located on the non-Federal lands;

☐ Impacts on animal species that are rare, endangered, threatened or of special concern, evaluating the availability of suitable habitat for the affected species within the geographic area adjacent to the Federal habitat that would be adversely impacted;

☐ Impacts on the number of wildlife corridors for Canada lynx and gray wolf within the geographic areas of the Federal lands;

☐ The number of acres and the percentage within each LAU within the Federal and non-Federal land that would be destroyed, impaired or otherwise placed in unsuitable condition for lynx habitat overall and within a 10-year period;

**Comment Number** LE 302-4

**Commenter Name** Kevin Proescholdt

**Comment** 3. Valuable Habitat Lost - The public lands proposed for exchange have been identified as some of the highest quality remaining habitat left in that landscape. It is also critical habitat for Canada Lynx (a federally-listed threatened species), and important habitat for Gray Wolf (a federally-listed threatened species) and many other sensitive wildlife and plant species. It encompasses an identified important wildlife travel corridor. Should the Forest Service divest itself of this land, the development of three open-pit mines on the site will significantly impact this habitat. The Forest Service must articulate how the proposed exchange would help it meet its goal of providing for a variety of life by managing biologically diverse ecosystems.

## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 307-4

**Commenter Name** Loni Kemp

**Comment** The federal land that would be lost includes thousands of acres of high quality wetlands and habitat for endangered species including the Canada lynx and the gray wolf. The federal land drains into the Partridge River, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. up to 6,650 acres of the federal land could be exploited for mining.

In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, has few minerals and much of it has been heavily logged. For the taxpayer as well as for the environment, the PolyMet Land Exchange would not be a fair trade.

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**Comment Number** LE 315-11

**Commenter Name** Kevin Reuther

**Comment**

- Wildlife impacts
  - o Analysis of wildlife corridor loss/expansion
  - o Analysis of roadless area loss/expansion
  - o Analysis of impact on lynx critical habitat

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**Comment Number** LE 323-4

**Commenter Name** Paula Maccabee

**Comment** The proposed Land Exchange, impacting 6,650 acres of the Superior National Forest, has great significance. It encompasses thousands of acres of pristine and high quality wetlands, many acres of the 100-Mile Swamp, a large black spruce, tamarack and cedar wetland and habitat for endangered species including the Canada lynx and the gray wolf. The Superior National Forest land proposed to be taken out of public ownership includes Mud Lake and Yelp Creek.

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**Comment Number** LE 356-11

**Commenter Name** Kristin Henry

**Comment** The Forest Service is also proposing to exchange valuable wildlife habitat for numerous federal- and state-listed endangered species. For instance, the agency is proposing to exchange approximately 1,500 acres of Canada lynx habitat, including two valuable travel corridors. In exchange, the agency does not appear to gain valuable wildlife habitat. See Scoping Notice at 2-3 (only one of the five proposed parcels serves as habitat for one state threatened species). The agency should consider what will be the true cost in terms of lost ecological value if it proceeds with an exchange of ecologically valuable lands for lands with a reduced ecological value. This analysis should focus on how this exchange will impact recovery plans for these listed species, especially in light of climate change. (For example, do the impacted travel corridors represent a critical habitat link for the lynx in a warmer environment?)

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 356-21

**Commenter Name** Kristin Henry

**Comment** It does not appear that the proposed land exchange meets any of the priorities established by the Forest Service in the Superior National Forest Plan. For instance, under the proposed exchange the agency would be relinquishing 1,454 acres of Canada Lynx habitat a federally-listed threatened species. However, according to the limited information provided to the public so far, the agency would get land with hardly any habitat value. See Scoping Notice at 2-3 (only one of the five proposed parcels serves as habitat for one state threatened species).

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**Comment Number** LE 516-3

**Commenter Name** Meghan Luke

**Comment** I am greatly concerned with the loss of wetlands and the loss of the "one hundred mile swamp;" with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx critical habitat. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves.

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**Comment Number** LE 566-23

**Commenter Name** Marc Fink

**Comment** The Forest Service must insure, in consultation with the U.S. Fish and Wildlife Service, that the proposed land exchange – and the resulting direct, indirect, and cumulative impacts – is not likely to jeopardize the continued existence of any threatened or endangered species, or result in the destruction or adverse modification of their critical habitat. 16 U.S.C. § 1536(a)(2). The Forest Service must fully analyze and disclose the potential adverse affects to wolves and lynx, including impacts to their few remaining travel corridors through the iron range. The Forest Service must similarly analyze and disclose the potential adverse impacts to any other designated state or federal plant or animal species.

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**Comment Number** LE 581-3

**Commenter Name** Steve Koschak

**Comment** The federal land proposed for exchange includes habitat for endangered species including the Canadalynx and the gray wolf. The federal land drains into the PartridgeRiver, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. Up to 6,650 acres of the federal land could eventually be exploited for mining.

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 585-10

**Commenter Name** Bradley Sagen

**Comment** Endangered Species Protection and Wildlife Habitat  
Under the 2004 Forest Plan, as well as more general guidance, USFS has substantial obligations to protect endangered species and to maintain wildlife habitat in general. To cite just a few examples from the 2004 Plan for purposes of illustration:  
"Maintain, protect, or improve habitat for all threatened and endangered species by emphasizing and working toward the goals and objectives of federal recovery plans and management direction in the Forest Plan. (Forest Plan, O-WL-4, p. 2-29)  
"Promote the conservation and recovery of Canada lynx and its habitat."  
(Forest Plan, O-WL-8, p. 2-29)  
"Maintain and, where necessary and feasible, restore sufficient habitat connectivity to reduce mortality related to roads and to allow lynx to disperse within and between LAUs [lynx analysis units] and between LAUs and Boundary Waters Canoe Area Refugium on NFS land." (Forest Plan, O-WL-11, p. 2-29)

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**Comment Number** LE 585-11

**Commenter Name** Bradley Sagen

**Comment** Federal lands proposed for exchange contain designated critical habitat and provide wildlife corridors for lynx and wolf. This information is readily available in the PolyMet DEIS. USFS has designated Lynx Analysis Units (LAUs) within the Superior National Forest "that comprise landscape-scale analysis areas for lynx management" (DEIS pg. 4.4-3). The mine site is in LAU 12. Almost all of LAU 12 provides suitable lynx habitat and should be protected from intrusive activities. The site is likewise located within Zone 2 of the designated critical habitat for the Gray Wolf. (DEIS, p. 4.4-3).

Federal lands considered in the exchange include two important wildlife corridors. The DEIS acknowledges that the NorthMet project will impact these travel corridors. The DEIS cites a study by Emmons and Olivier Resources Inc. (2006) that identifies 13 major wildlife travel corridors connecting large roadless blocks along the Iron Range. The study considered the loss of any one of these wildlife corridors "significant" (DEIS pg. 4.4-30).

Conclusion. USFS should acknowledge its responsibilities for protection of endangered species and for wildlife habitat, and should conduct a thorough evaluation of the land exchange and its potential cumulative and other impacts should the proposed open pit mining activity occur. USFS should likewise conduct a thorough biological analysis of all five of the non-federal candidate tracts. The public is entitled to understand the biological diversity values being gained and lost in the exchange.

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**Comment Number** LE 610-2

**Commenter Name** Cheryl Dannenbring

**Comment** This exchange would be extremely detrimental to wildlife which needs large tracts of forest to survive, for instance the Lynx, a federally threatened species.

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 627-19

**Commenter Name** Betsy Daub

**Comment** Variety of Life - Threatened, Endangered and Special Concern Species  
As described earlier, the federal lands within this proposal have been identified as high quality habitat value, representing rare habitat features within its landscape. These lands provide important habitat for a diverse array of wildlife, some of which are threatened, endangered or special concern species. The loss of this habitat needs to be fully evaluated in the assessment of this exchange. The biological value of the non-federal candidate tracts need to be understood much more completely.

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**Comment Number** LE 627-20

**Commenter Name** Betsy Daub

**Comment** The federal lands contain nine known state-listed endangered, threatened or species of special concern (ETSC) plant species. Many of these populations are expected to be destroyed by direct or indirect activities of the mine. The mine site population of *Caltha natans*, floating marsh marigold, represents 42% of the statewide population of this state-listed endangered species. Only 12 known populations of this plant occur in the state. Five populations are at the mine site. The remaining state populations are either down-gradient from the mine site and susceptible to changes in water chemistry or hydrology, or along the Partridge River, which is also likely to be impacted by mine operations, discharges and hydrologic changes. The NorthMet project constitutes a risk to the entire population of this plant in Minnesota.

The scoping documents prepared by PolyMet for the proposed land exchange only examine ETSC species for two candidate non-federal tracts. No surveys for plants have been conducted on these candidate tracts. The scoping documents indicate some species have been found within the vicinity of these tracts. At this time, the public is unaware of any sensitive plant species that might be acquired through such an exchange.

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**Comment Number** LE 627-22

**Commenter Name** Betsy Daub

**Comment** Wildlife  
1.) Canada Lynx - Canada lynx are a federally-listed threatened species. The DEIS acknowledges that portions of the mine site - included within the federal lands considered for the exchange proposal - lie within the recently revised boundaries of federally designated critical habitat for lynx. It also acknowledges that "the Project would result in the loss of...1,454 acres of lynx habitat" (DEIS pg. 4.4-10). The DEIS also says, "Habitat loss at the Mine Site, however, would result in fragmentation of lynx habitat in a portion of its current range" (DEIS pg. 4.4-10).

At least 20 individual lynx have been identified within 18 miles of the mine site. While the scoping documents prepared by PolyMet for the proposed exchange do not mention this fact, it is the understanding of the Friends that during the winter of 2009-2010, evidence of active lynx use of these lands was found by U.S. Fish and Wildlife biologists.

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## TES                      Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 627-23

**Commenter Name** Betsy Daub

**Comment**                The U.S. Forest Service has designated Lynx Analysis Units (LAUs) within the Superior National Forest "that comprise landscape-scale analysis areas for lynx management" (DEIS pg. 4.4-3). The mine site is in LAU 12. About 94% of LAU 12 provides suitable lynx habitat.

Critical habitat was designated for the lynx as part of a process to reverse this species population decline. The Endangered Species Act defines critical habitat for endangered or threatened species as:

"(i) the specific areas within the geographical area occupied by the species, at the time it is listed...or on which are found those physical or biological features (I) essential to conservation of the species and (II) which may require special management considerations or protection; and  
(ii) specific areas outside the geographical area occupied by the species at the time it is listed and that are essential for the conservation of the species" (Endangered Species Act 1973 Section 3(5)(A)).

The loss of critical habitat from this project's activities is detrimental to the recovery of this species and violates the provisions of the Endangered Species Act.

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**Comment Number** LE 627-24

**Commenter Name** Betsy Daub

**Comment**                Maps created by the Minnesota Center for Environmental Advocacy (Maas 2010) using data published in the Journal of Wildlife Management (Moen 2008), indicate that the PolyMet mine site contains large amounts of suitable lynx denning sites. The tribal cooperating agencies note, "the tribal cooperating agencies disagree with the conclusion that the effects on statewide lynx populations would be insignificant; this analysis does not consider the possibility that the Mine Site might include critical components of lynx habitat present such as den sites" (Tribal Cooperating Agencies, DEIS pg. 4.4-10).

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**Comment Number** LE 627-25

**Commenter Name** Betsy Daub

**Comment**                Reclamation work at the mine site may also make this critical lynx habitat more suitable as bobcat habitat than as lynx habitat. "It is the tribal cooperating agencies' note that this restoration of 'lynx habitat' initially creates good bobcat habitat. Bobcats are superior competitors to lynx and thus may prevent lynx from returning to the site" (Tribal Cooperating Agencies, DEIS pg. 4.4-11). The proposed project may therefore diminish critical lynx habitat long into the future.

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**Comment Number** LE 627-26

**Commenter Name** Betsy Daub

**Comment**                The DEIS also notes the increased risk of the project resulting in lynx-vehicle collisions.

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**Comment Number** LE 627-27

**Commenter Name** Betsy Daub

**Comment**                The DEIS contains no biological assessment or completed consultation with the U.S. Fish and Wildlife Service (USFWS). It does not analyze the cumulative impacts on the species.

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## TES Threatened, Endangered, and Special Status Species Issues

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**Comment Number** LE 627-28

**Commenter Name** Betsy Daub

**Comment** The proposed land exchange if it occurred would result in the loss of a large, intact piece of lynx habitat in LAU 12, with smaller, fragmented pieces acquired in LAUs 4, 16, 21, 22, and 42. The largest proposed candidate non-federal tract, Tract 1, does not appear to be within any LAU by our analysis.

A thorough understanding of the lynx habitat value of the non-federal candidate lands has not yet been provided to the public. Only two of the five tracts were evaluated by PolyMet in the scoping documents. Of those evaluated, the report notes that the Minnesota Lynx Database found records of lynx sightings that were either on or near the parcels between 2004 and 2006.

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**Comment Number** LE 627-29

**Commenter Name** Betsy Daub

**Comment** 2.) Gray Wolf - The gray wolf is a federally-listed threatened species and a Minnesota species of special concern that has also been identified as potentially occurring within the project area included in the federal lands considered in the exchange. The project is located within Zone 2 of the gray wolf's federally-listed critical habitat. "Radio-collared wolves were documented to the north and northeast of the Mine Site in 200, 2005 and 2008; and calling surveys located wolves south of the Mine Site in 2004..."(DEIS pg. 4.4-4). The DEIS notes, "Observations indicate the likelihood of a single wolf pack whose territory includes the Mine and Plant Sites" (DEIS pg. 4.4-12).

The development of the mine site by the Proposed Action would remove 1,454 acres of wolf habitat, about 1-10% of a single wolf pack territory. Without providing supporting data or a biological assessment, or a completed USFW consultation, the DEIS arrives at this unsupported claim: "This reduction in available habitat is relatively small and is not expected to significantly affect the wolf population in the region..." (DEIS pg. 4.4-12).

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**Comment Number** LE 627-30

**Commenter Name** Betsy Daub

**Comment** As with the lynx, vehicle collisions with wolves are noted as a potential risk from project activities.

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**Comment Number** LE 627-31

**Commenter Name** Betsy Daub

**Comment** Like the lynx, a thorough understanding of the wolf habitat value of the non-federal candidate lands has not yet been provided to the public. Only two of the five tracts were evaluated by PolyMet in the scoping documents. Of those evaluated, the report notes that the Minnesota Wolf Telemetry Database shows radio-collared wolves on "the nonfederal parcel" (it does not say which one) from 1994 to 2001.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 001-3

**Commenter Name** Larry Adams

**Comment** In addition to opposing the Land Exchange, I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 001-6

**Commenter Name** Larry Adams

**Comment** • The SDEIS must consider PolyMet's actual proposed use of the federal land - open pit sulfide mining and potential exploitation of the entire site - in determining what the public would lose in the exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 009-5

**Commenter Name** Wanda Ballentine

**Comment** Meanwhile, PolyMet's proposed open pit sulfide mining and potential exploitation of the entire site clearly means that the public will lose an enormous amount in an exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 063-4

**Commenter Name** Kristin Larsen

**Comment** The County Biological survey has not yet been completed in St. Louis County. We need this to be complete prior to even contemplating any further exchanges in the area. The survey must be done by the official and properly supervised team that does the official surveys for the Minnesota Department of Natural Resources in order to have credibility. A least 11 species of botrychium have been found, over 20 species of endangered, threatened or special concern plants will be impacted by the proposed use of the land to be exchanged. The 100 mile Swamp and the many fens in the area are threatened - some of which have yet to be even given preliminary study. The idea is presented that in coming decades more habitat will be present for these species, this idea borders on the absurd.

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**Comment Number** LE 063-5

**Commenter Name** Kristin Larsen

**Comment** Not only will the species not thrive in the ensuing time, but the likelihood exists that some won't make it even if such imagined enhanced habitat should appear. A species here or there may not seem important to people – how many species is the Polymet project worth? Discussion of the lands as habitat or a corridor through which animals pass seems irrelevant in modern life to many – yet the existence of those animals and their well being is what our state is about – it's what our north is about. What are we if we do not have a place for wild things? Even the most self serving analysis reminds us we may need those wild things one day.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 070-2

**Commenter Name** Janice Greenfield

**Comment** I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 227-9

**Commenter Name** Matthew Tyler

**Comment** •A comparative risk assessment of wildlife habitat loss or conversion on Federal and Private Lands with and without the land exchange. That is, a risk assessment of whether and how much habitat on Private Lands is likely to be lost to development or mining without the exchange vs. a risk assessment of whether and how much habitat on Federal Lands is likely to be lost to development or mining if the land exchange is made. This serves to assess the overall, regional effects on wildlife habitat as part of the cumulative effects assessment.

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**Comment Number** LE 227-12

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis of impacts to wild rice related to the land exchange and PolyMet's mine proposal.  
•Detailed analysis of impacts to the aquatic food chain related to the land exchange and PolyMet's mine proposal.

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**Comment Number** LE 249-2

**Commenter Name** Darren Vogt

**Comment** The purpose of the scoping is to identify issues to be included in the environmental impact statement. We believe that effects of the project on the exercise of treaty rights and maintenance of tribal cultural practices are issues to be addressed. Tribes are sovereign nations, and by treaty with the United States retain rights to hunt, fish, and gather in the 1854 Ceded Territory. Band members continue to exercise these rights. The harvesting and use of natural resources is part of Ojibwa identity and culture. Any threat to the access and harvest of traditional plants and animals is seen as a threat to Ojibwa culture and the right of band members to exercise their cultural identity.

The proposed project includes exchanging federal land of about 6,650 acres in size. This federal land consists of a single contiguous tract of mostly forested land. This area encompasses many acres of the 100 Mile Swamp, a large and high quality wetland. It provides habitat for wildlife along with a variety of plant resources that have been and could be utilized by band members exercising treaty rights. A clear understanding of the potential resources affected or lost by the proposed land exchange should be outlined. Effects to game species and associated habitat (moose is a priority) are of interest. Wild rice is a culturally important resource to the bands, and any potential impacts resulting from lands lost or acquired should be identified.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 282-33

**Commenter Name** Paula Maccabee

**Comment** VEGETATION

□ Objective: “Maintain acres of non-forested wetlands.” (Forest Plan, O-VG-4, p. 2-23)

□ Objective: “Increase acres of young lowland black spruce and tamarack forest communities. Increase acres of old-growth lowland black spruce and tamarack forest communities.” (Forest Plan, O-VG-16, p. 2-24)

□ Objective: “In mature or older upland forest types managed to maintain large patches (>300 acres of all types) manage patches to maintain the characteristics of mature or older native upland forest vegetation communities and promote the maintenance or development of interior forest habitat conditions.” (Forest Plan, O-VG-17, p. 2-24)

□ Objectives: “In Spatial Zones 1 and 2 maintain or increase amount of interior forest habitat. Provide interior habitat in a variety of upland and lowland vegetation communities.” (Forest Plan, O-VG-22, p. 2-26) “In Spatial Zone 3 strive to minimize the decrease in interior forest habitat in a variety of upland and lowland vegetation communities (Forest Plan, O-VG-25, p. 2-27)

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**Comment Number** LE 302-4

**Commenter Name** Kevin Proescholdt

**Comment** 3. Valuable Habitat Lost - The public lands proposed for exchange have been identified as some of the highest quality remaining habitat left in that landscape. It is also critical habitat for Canada Lynx (a federally-listed threatened species), and important habitat for Gray Wolf (a federally-listed threatened species) and many other sensitive wildlife and plant species. It encompasses an identified important wildlife travel corridor. Should the Forest Service divest itself of this land, the development of three open-pit mines on the site will significantly impact this habitat. The Forest Service must articulate how the proposed exchange would help it meet its goal of providing for a variety of life by managing biologically diverse ecosystems.

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**Comment Number** LE 315-11

**Commenter Name** Kevin Reuther

**Comment** • Wildlife impacts  
o Analysis of wildlife corridor loss/expansion  
o Analysis of roadless area loss/expansion  
o Analysis of impact on lynx critical habitat

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**Comment Number** LE 323-4

**Commenter Name** Paula Maccabee

**Comment** The proposed Land Exchange, impacting 6,650 acres of the Superior National Forest, has great significance. It encompasses thousands of acres of pristine and high quality wetlands, many acres of the 100-Mile Swamp, a large black spruce, tamarack and cedar wetland and habitat for endangered species including the Canada lynx and the gray wolf. The Superior National Forest land proposed to be taken out of public ownership includes Mud Lake and Yelp Creek.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 324-1

**Commenter Name** Daniel Mundt

**Comment** I have been long involved and concerned about what is being done with respect to the whole matter of surface and ground water.

In my opinion, the knowledge that we have of ground water, its circulation, and migration is not a very reliable source of information.

The concern that I have is the affect on the development of the large project that is being proposed and what that will do ultimately to not just the forest and the wetlands habitat, the availability of the use of land for the public, but more importantly the entire water supply situation.

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**Comment Number** LE 340-4

**Commenter Name** John Reed

**Comment** The SDEIS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities.

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**Comment Number** LE 452-10

**Commenter Name** Randy Neprash

**Comment** 5. I am concerned that the land exchange will negatively affect sensitive species, including loss of habitat for moose and threatened lynx and wolves. I am also concerned about the loss of open spaces and loss of forests.

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**Comment Number** LE 485-9

**Commenter Name** JoAnn M. Olson

**Comment** 2) Corridors. The PolyMet mine will obstruct at least 2 of the remaining 13 corridors where wildlife can cross the 120 miles of the Mesabi Iron Range. These corridors are important not only for mammals like moose and wolves but also for the northward migration of the deciduous forest and all its components in the face of climate change. The DEIS ignored the mine's impact on wild corridors.

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**Comment Number** LE 485-10

**Commenter Name** JoAnn M. Olson

**Comment** 3) Wild Rice. The PolyMet Mine will result in enormous sulfate releases that will exceed the state standard for wild rice, which is sensitive to sulfates. These sulfates will likely eliminate wild rice in the Partridge and Embarrass Rivers, and diminish the famous wild rice beds in the St. Louis River estuary near Duluth, which is 100 miles away from the mine. The DEIS did not adequately analyze impacts on wild rice and the associated health and economic impacts.

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**Comment Number** LE 499-4

**Commenter Name** Lois Norrgard

**Comment** Loss of some of the last populations of sensitive plant species, and wood turtle habitat.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 585-10

**Commenter Name** Bradley Sagen

**Comment** Endangered Species Protection and Wildlife Habitat  
Under the 2004 Forest Plan, as well as more general guidance, USFS has substantial obligations to protect endangered species and to maintain wildlife habitat in general. To cite just a few examples from the 2004 Plan for purposes of illustration:  
"Maintain, protect, or improve habitat for all threatened and endangered species by emphasizing and working toward the goals and objectives of federal recovery plans and management direction in the Forest Plan. (Forest Plan, O-WL-4, p. 2-29)  
"Promote the conservation and recovery of Canada lynx and its habitat."  
(Forest Plan, O-WL-8, p. 2-29)  
"Maintain and, where necessary and feasible, restore sufficient habitat connectivity to reduce mortality related to roads and to allow lynx to disperse within and between LAUs [lynx analysis units] and between LAUs and Boundary Waters Canoe Area Refugium on NFS land." (Forest Plan, O-WL-11, p. 2-29)

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**Comment Number** LE 585-11

**Commenter Name** Bradley Sagen

**Comment** Federal lands proposed for exchange contain designated critical habitat and provide wildlife corridors for lynx and wolf. This information is readily available in the PolyMet DEIS. USFS has designated Lynx Analysis Units (LAUs) within the Superior National Forest "that comprise landscape-scale analysis areas for lynx management" (DEIS pg. 4.4-3). The mine site is in LAU 12. Almost all of LAU 12 provides suitable lynx habitat and should be protected from intrusive activities. The site is likewise located within Zone 2 of the designated critical habitat for the Gray Wolf. (DEIS, p. 4.4-3).

Federal lands considered in the exchange include two important wildlife corridors. The DEIS acknowledges that the NorthMet project will impact these travel corridors. The DEIS cites a study by Emmons and Olivier Resources Inc. (2006) that identifies 13 major wildlife travel corridors connecting large roadless blocks along the Iron Range. The study considered the loss of any one of these wildlife corridors "significant" (DEIS pg. 4.4-30).

Conclusion. USFS should acknowledge its responsibilities for protection of endangered species and for wildlife habitat, and should conduct a thorough evaluation of the land exchange and its potential cumulative and other impacts should the proposed open pit mining activity occur. USFS should likewise conduct a thorough biological analysis of all five of the non-federal candidate tracts. The public is entitled to understand the biological diversity values being gained and lost in the exchange.

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**Comment Number** LE 619-2

**Commenter Name** Steven Garske

**Comment** To start with, this land exchange would facilitate the destruction of over 1000 acres of high quality lowland conifer forests, wetlands and bogs, and damage and pollute thousands more acres of adjacent land. In comments highly critical of this mining proposal, the EPA has pointed out that these lands qualify as aquatic resources of national importance (ARNI), and that a strip mine would severely degrade them. The Minnesota County Biological Survey (MCBS) has identified the site of this proposed mine as being highly significant in terms of unique habitat, biodiversity, downstream water quality, and flood control. Trading this land to Polymet will result in destruction of this pristine area and the permanent loss of the environmental benefits it provides.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 627-21

**Commenter Name** Betsy Daub

**Comment** Non-native Invasive Species

The DEIS describes the plan to use non-native plant species to stabilize disturbed areas and to reclaim the project area. Some of these species are considered to be invasive species. The DEIS acknowledges, "These species, once introduced, are difficult to remove and could spread to and colonize susceptible areas following future disturbance...These species may reduce diversity, out-compete native vegetation, and provide lower quality habitat for some specialist animal species" (DEIS pg. 4.3-11).

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**Comment Number** LE 627-32

**Commenter Name** Betsy Daub

**Comment**

3) Other Sensitive Wildlife - Other wildlife species are potentially at risk from the mine project on the federal lands proposed for exchange. Bald eagle, wood turtle, heather vole, yellow rail, and tiger beetle are some mentioned in the DEIS. But the DEIS predicts no adverse effects to these species.

The DEIS fails to assess impacts to many of these species from the predicted water contamination that is likely to spread from the site. For example, mercury contamination has been identified as a high risk for occurring, but no method for preventing or containing mercury pollution has been described in the DEIS. And the DEIS fails to analyze the risk of wildlife exposure to mercury. As the tribal cooperating agencies note, "impacts to bald eagles could result from eagle feeding sites within or adjacent to the project area. Contaminants from the mine site, specifically mercury and heavy metals, could affect prey species thus having secondary impacts on eagle reproduction" (Tribal Cooperating Agencies, DEIS pg. 4.4-13).

When discussing the known wood turtle population downstream from the mine site, the DEIS says, "the Project would not result in exceedances of surface water quality standards in the Upper Partridge River; therefore, there would be no significant project-related changes to water quality and no indirect effects on downstream habitat where wood turtles are located..."(DEIS pg. 4.4-13).

It is hard to understand how the DEIS can draw this unequivocal conclusion. The DEIS has acknowledged predicted water quality exceedances, the un-tested effectiveness of the East Pit wetland treatment system, and that untreated seepage will be released into a tributary of the Partridge River. The DEIS has failed to properly analyze groundwater flow, and has likely mischaracterized the hydrologic connectivity of the adjacent wetlands with groundwater. With these inadequacies in data, it cannot be stated that there will be no significant project-related changes to water quality. Therefore, the full impact to wood turtles and other wildlife has not been evaluated by this DEIS.

It is clear from the scoping documents that the federal lands provide habitat for a diverse array of wildlife.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 627-34

**Commenter Name** Betsy Daub

**Comment** 4.) Wildlife Travel Corridors - The federal lands considered in the exchange include two important wildlife corridors. The DEIS acknowledges that the NorthMet project will impact these travel corridors. The DEIS cites a study by Emmons and Olivier Resources Inc. (2006) that identifies 13 major wildlife travel corridors connecting large roadless blocks along the Iron Range. The study considered the loss of any one of these wildlife corridors "significant" (DEIS pg. 4.4-30).

The NorthMet project area includes Corridors 11 and 12. The DEIS acknowledges that Corridor 11 is already obstructed and "not likely to be heavily used by wildlife" (DEIS 4.4-31). This would increase the significance of the remaining corridors for wildlife travel. But Corridor 12 is likely to be heavily impacted by the project. "Operations at the Mine Site would indirectly impact the corridor by reducing the size of, and acting as a source of noise and activity near, the large habitat block southeast of the corridor" (DEIS pg. 4.4-31).

As the tribal cooperating agencies note, "#12 will likely be degraded as a corridor by the Project; these impacts should be considered significant" (Tribal Cooperating Agencies, DEIS pg. 4.4-32).

The scoping documents for the land exchange do not mention if the candidate nonfederal parcels provide important wildlife travel corridors. At this time, the public has no information to assess what value these lands would bring should they be acquired.

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**Comment Number** LE 627-35

**Commenter Name** Betsy Daub

**Comment** 5.) Fish and Macroinvertebrates - The impacts of the project on fish and macroinvertebrates cannot be fully understood due to an inadequate sampling effort. The DEIS notes that the nearest known occurrence of northern brook lamprey is far from the project area. And yet, the tribal cooperating agencies note, "...no conclusion about the presence of northern brook lamprey can be made in this analysis without specific surveys in the Project Area. Tribal fisheries biologist have definitively identified this species in the Dark River, just a few miles to the west of the St. Louis River watershed" (Tribal Cooperating Agencies, DEIS 4.5-2).

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**Comment Number** LE 627-36

**Commenter Name** Betsy Daub

**Comment** The creek heelsplitter, a state mussel species of special concern, was also not adequately sampled to determine its presence.

"The tribal cooperating agencies position is that there was not adequate sampling effort to determine the presence of the creek heelsplitter in the Project Area, particularly for a species that is already known to be limited in numbers or distribution. While the detection probability is low for each site, tribal fisheries biologists have sampled this species in the headwaters region of the St. Louis River, approximately a mile downstream of Seven Beavers Lake...in 2008" (Tribal Cooperating Agencies, DEIS pg. 4.5-5).

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**Comment Number** LE 627-37

**Commenter Name** Betsy Daub

**Comment** The exchange scoping documents indicate that wildlife surveys occurred on only two of the five candidate nonfederal tracts. There is no indication that surveys included fish and macroinvertebrates.

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## VWH Vegetation, Wildlife, and Habitat

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**Comment Number** LE 627-38

**Commenter Name** Betsy Daub

**Comment** Recommendations:  
The Forest Service needs to conduct a thorough biological analysis of all five of the non-federal candidate tracts. The public needs to understand the biological diversity values being gained and lost in the exchange. Plant surveys must be conducted. The impacts on *Caltha natans*, floating marsh marigold, must be understood and articulated. The taking of the entire population of a state-listed endangered species would violate Minnesota's endangered species laws. The Forest Service needs to analyze the potential impact of the mine project using non-native invasive species should invasive species spread to other public lands and affect species diversity in the region. Lynx habitat values on both the federal and non-federal lands must be more fully explored. New information about active use of the federal lands by lynx must be included in the analysis. An examination is needed of what the loss of habitat in LAU 12 will mean for lynx recovery. Loss of this habitat would appear to violate the Endangered Species Act, and the Forest Service must explore this further. The exchange should be examined for implications of expanding bobcat habitat and diminishing lynx habitat in the area. A thorough examination of wolf habitat values on the federal and non-federal lands is needed. For both lynx and wolf, potential use of the nonfederal lands must be understood in recent terms, not just from database records that are many years old. Impacts to bald eagle reproduction should be considered from eagles eating contaminated fish. The Forest Service needs to give careful examination of impacts of the exchange for all Regional Forester's Sensitive Species. This must consider scenarios for water quality exceedances, situations which are probable. This assessment should include impacts to more common species, such as moose, which are experiencing a statewide population decline and for which preserving wetlands may be important. The loss of wildlife corridor 11 and 12 must be analyzed, and the nonfederal parcels analyzed for their role in wildlife travel. Within the Laurentian Highlands, 22 Species of Greatest Conservation Need are typically associated with lowland conifer forests like the 100 Mile Swamp and PolyMet mine site, and the exchange must be analyzed for impacts to any of these species. A more thorough understanding of the fish and macroinvertebrate population is needed for both the federal and nonfederal lands under consideration. Travel corridors and Lynx Analysis Units are meaningful landscape units when they are connected, intact and unfragmented. The Forest Service must better understand what the implications for wildlife are if connected and unfragmented units are lost, and if what is gained is smaller and fragmented. It must be highlighted in a final evaluation that wildlife corridors and habitat will be actually lost through the development of the federal lands, while the gain to the public is habitat that already exists. And, this analysis must examine if the proposed exchange meets the Forest Plan Goal of providing for a variety of life by managing biologically diverse ecosystems.

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**Comment Number** LE 627-40

**Commenter Name** Betsy Daub

**Comment** In addition, while there exist a large body of information about the types of vegetation and habitat on the federal lands, at this point the public knows almost nothing of the diversity of ecosystems accounted for in the nonfederal lands.

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**Comment Number** LE 682-2

**Commenter Name** Robin Vora

**Comment** One-Hundred-Mile-Swamp should also be thoroughly surveyed for rare species, including rare plants, lichens, and bryophytes.

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## WAT Water Resources

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**Comment Number** LE 001-3

**Commenter Name** Larry Adams

**Comment** In addition to opposing the Land Exchange, I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 063-12

**Commenter Name** Kristin Larsen

**Comment** The land was purchased by our nation and the value of that land must be recognized in the most profound manner, it is the exact kind of land you should be acquiring. This land is an aquatic resource of national importance "due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin." The land is valuable because of where it is and because of its naturally created profound protective functions for the watershed. Its value is not just the current value of similar land but of this land positioned as it is - protecting the headwaters. To say you can substitute other land is akin to saying that 4 kidneys distributed among 2 persons, with 4 being in one body and 0 being in another body means the same as 2 kidneys in each body - and you can't just put a kidney in a foot and hope things work out - the watershed is as it is naturally for a reason - to purify and protect the great waters. You can't exchange wetlands in the manner you are attempting to do without harm to the greater ecosystem. The functions performed by the land are protective of the water - permanently - and do not have a cost to the public. We don't have to pay to have the headwaters purified - the land does that. This is the most important function that land can perform - and to ignore that is wrong and impermissible. Multiple parcels of land are being considered in this exchange, these multiple pieces are of far less value to the ecosystem and thus to the nation and its people.

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**Comment Number** LE 070-2

**Commenter Name** Janice Greenfield

**Comment** I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 227-5

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis and comparison of the relative contributions of the Federal and Private Lands to water quality, quantity, and flood control in the Lake Superior Basin & Rainy River Basin watersheds.

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**Comment Number** LE 227-10

**Commenter Name** Matthew Tyler

**Comment** •A comparative risk assessment of water quality degradation in the Lake Superior and Rainy River watershed with and without the land exchange. That is, a risk assessment of the likelihood and degree of water quality degradation related to the Private Lands would occur without the exchange vs. a risk assessment of the likelihood and degree of water quality degradation related to Federal Lands is likely to occur if the land exchange is made. This serves to assess the overall, regional effects on water quality as part of the cumulative effects assessment.

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## **WAT      Water Resources**

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**Comment Number** LE 227-18

**Commenter Name** Matthew Tyler

**Comment** The 2004 Superior National Forest Land and Resource Management Plan (Forest Plan) specifically addresses watershed level water quality and quantity:

Objective: "Improve and protect watershed conditions to provide the water quality, water quantity, and soil productivity necessary to support ecological functions and intended beneficial water uses." (Forest Plan, O-WS-1, p. 2-12)

Because the plan specifically calls for improving and protecting water quality and quantity at the watershed level, a thorough analysis of the land exchange would include an analysis of the importance of the Federal and Private lands to water quality and quantity in their regional watersheds. Put simply, to understand whether the exchange is a "fair trade" that protects the Federal Estate and is in accordance with the Forest Plan, one has to know whether the lands provide equal "water quality," "water quantity" and "flood control" ecosystem services

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## WAT Water Resources

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**Comment Number** LE 227-22

**Commenter Name** Matthew Tyler

**Comment**

One aspect of wetland function that is not dealt with particularly well in the MnRAM assessment is the landscape position and connectivity of the wetland relative to the open water bodies where water quality is measured. The scientific literature is pretty clear that landscape context can be very important to wetland impacts on water quality:

“Regional wetlands are integral parts of larger landscapes—drainage basins, estuaries. Their function and their values to people in these landscapes depend on both their extent and their location. Thus, the value to man of a forested wetland varies. If it lies along a river it probably has a greater functional role in stream water quality and downstream flooding than if it is isolated from the stream. If situated at the headwaters of a stream, a wetland would function in ways different from those of a wetland located near the stream’s mouth. The fauna it supports depend on the size of the wetland relative to the home range of the animal. Thus to some extent each wetland is ecologically unique. This complicates the measurement of its ‘value’.” (Mitsch & Gosselink 1993)

The point that the landscape position of a wetland relative to a body of water is important for determining the impact of the wetland on water quality is also echoed by the authors of a seminal study on the cumulative impact of wetlands on water quality and quantity in Hennepin County, Minnesota:

“Our results indicate the importance of considering wetland position in the landscape when evaluating cumulative function. All wetlands in a watershed do not behave alike with regard to water quality function, which may explain why previous attempts to relate percent wetland to drainage basin water quality have generally been unsuccessful (Whigham and Chitterling 1988). Wetland extent (PC1) was related to decreased concentrations of only three of the time-weighted variables on an annual basis, none of which were nutrients: chloride, lead, and specific conductance. PC2, which was related to wetland proximity, helped to explain decreased concentrations of five annual time-weighted variables (LGSPCND, LOGFCOL, FRDP, SQRTNO3, TSIS) and three additional flow-weighted variables (NH4, NOX, and TP). Therefore, the position of wetlands in the watershed appears to have a substantial effect on water quality, particularly with regard to sediment and nutrients.” (Johnston, et al. 1990, p 136, emphasis added).

In plain English, the study found that the proximity of a wetland to a stream was significant in explaining decreased levels of nitrate, ammonia, fecal coliform bacteria, suspended solids, and similar attributes, while the area of a wetland appeared to be significant in explaining decreased levels of lead and chloride.

A similar study on the impacts of wetlands on phosphorus levels in streams in the Lake Champlain Basin (Weller et al. 2003) drew similar conclusions:

“The largest improvements in the phosphorus load model occurred with the addition of riparian wetlands... These results are consistent with published hypotheses that riparian wetlands have the greatest potential to improve water quality because their location close to the stream network results in extensive interaction with both stream water and surface water runoff (Brinson 1988).” (Weller et. al 1996, p. 736)

While MnRAM does take into account the general hydrogeomorphic character of the wetland, it is but one factor among many, and it does not account well for the shape, orientation, size, and distance between the wetland and surface waters.

A thorough analysis of the relative effects of wetlands on the Federal and Private lands on water quality and quantity would thus need to be spatially explicit and site specific. This may be especially relevant if larger wetlands better reduce concentrations of heavy metals, since many rivers in northeastern Minnesota are already impaired by high levels of mercury. It may also be significant because the wetlands with the Federal Lands, which are part of the extensive 100-mile swamp complex, are within close proximity to the tailings piles to the north and may already be filtering and sequestering a significant amount of

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tailings drainage that would otherwise enter the Partridge River.

Furthermore, a visual comparison of the floodplain and wetland maps supplied in the Feasibility Analysis show that a very large percentage of the wetland acres within the Federal Lands are within a flood plain, while only a small percentage of the wetlands on the Private Lands are within a flood plain. Wetlands within a floodplain are more likely to have the type of extensive interaction with their respective streams described by Weller et. al., and are therefore more likely to have higher functional value in protecting water quality. In this regard, floodplain loss may be more damaging to water quality than loss of wetlands per se. If the Private lands were to be equally protective of water quality, they would need to include the same number of flood plain-situated wetlands as the Federal Lands.

In contrast, the lineal distance of shoreline and stream frontage calculated in the Feasibility Analysis is likely a less useful measure of wetland functionality because it does not reflect the area and quality of wetlands connected to the stream. Some streams, for example, have steep channels and rocky shores that allow for little flooding or other wetland interactions. Thin wetlands along such streams are more accurately classified as fringe wetlands, and do not play as important a role in maintaining water quality (although control of suspended sediments can be quite substantial).

In these two major regards, the Feasibility Analysis is most likely wrong in its assessment that “There would likely be minor loss in wetland function to the environment as a whole.” Given a potential loss to the Federal Estate of at least 1,472 acres of floodplain, that floodplain wetlands appear to be of high value for water quality, and that much of the lost floodplain would subsequently be destroyed or degraded by the PolyMet project, it is more accurate to say that there would be a major loss of wetland function to the regional watershed.

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## WAT Water Resources

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**Comment Number** LE 227-23

**Commenter Name** Matthew Tyler

**Comment** There are many detailed, site specific and spatially explicit ways the water quality protection function of the wetlands involved in the proposed exchange can be measured and compared. Options include:

- ☐ Dye tracer and isotope tracer field studies to document the connectivity and filtration between individual wetlands and downstream locations. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events.
- ☐ Additional site specific, hydraulic and hydrologic field studies on both Federal and Private Lands to assess the connections between surface water in individual wetlands and the surficial and bedrock aquifers below them. This can be relatively easily done with clustered cased wells at varying depths. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events. The sixteen wells (DEIS Figure 4.1.8) used for the PolyMet DEIS study were inadequate to assess a more than 4,000 acre site.
- ☐ Additional site specific hydraulic and hydrologic field studies to assess the connectivity between the aquifers associated with individual wetlands and points just above rivers and streams. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events. The sixteen wells (DEIS Figure 4.1.8) used for the PolyMet DEIS study were inadequate to assess a more than 4,000 acre site.
- ☐ Additional collection of site specific precipitation and stream flow data to construct more detailed hydrologic models of both the Federal and Private Lands. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events. The models would need to simultaneously model surface water, groundwater, groundwater transport, and groundwater-surface water interactions. Two such models are the ADH and WASH123D models developed and validated by the US Army Corps of Engineers' Engineer Research & Development Center (Talbot 2005). From these calibrated models, the relative contributions and connectivity of individual wetlands could be estimated.
- ☐ Additional geologic borings and mapping of bedrock fractures that could create hydrologic connectivity between surficial aquifers, bedrock, and streams. Given the variability in the depth to bedrock on the Federal Lands (DEIS Documents: RS-2 Table 6, RS-74A p. 14-15) it is likely that water enters fractures in the bedrock and re-emerges beneath streams or other wetlands. Similar phenomena have been documented in pollutant transport studies at the Finland Air Force Base Superfund site near my home.
- ☐ Other appropriately rigorous methods suggested by a thorough literature search.

All such studies would need to be conducted thoroughly, using scientifically justifiable best practices, and in full consultation with Tribal Agencies. The analyses should also be conducted transparently, with data and preliminary results made publicly available. Finally, all tabulations of the results should clearly divide them into those benefiting the Lake Superior basin and those benefiting the Rainy River Basin; as well indicate which watersheds within the larger basins with which the wetlands are associated.

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**Comment Number** LE 277-8

**Commenter Name** Nancy Scholdt

**Comment** The Band notes that there has been no consideration of water quality impacts in the FA, even though the Hay Lake parcel is located adjacent to the Minorca taconite pit that Arcelor Mittal Steel is currently using for disposal of tailings. Water quality in the Hay Lake parcel is likely already degraded by tailings basin seepage, as recent monitoring data from Mittal Steel reveals manganese, arsenic and fluoride concentrations above the intervention limit in their operating permit. The SDEIS should comprehensively evaluate these impacts, and ensure that the nonfederal parcels under consideration do not include hazardous substances.

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## WAT      Water Resources

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**Comment Number** LE 282-27

**Commenter Name** Paula Maccabee

**Comment** Adverse impacts on high quality wetlands within the Lake Superior Watershed may be even more significant given the impacts of other mining projects on water quality and aquatic ecosystems. The U.S. EPA believes that the coniferous and open bogs of the Partridge River Watershed that would be destroyed by the PolyMet Land Exchange and mine project are aquatic resources of national importance (“ARNI”) “due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin.” (EPA DEIS Letter, p. 3)14 Protection of habitats and wetlands on the Federal lands are critical Forest System values and purposes.

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**Comment Number** LE 282-32

**Commenter Name** Paula Maccabee

**Comment** WATERSHEDS  
□Desired condition: “Management activities do not reduce existing quality of surface or groundwater or impair designated uses of surface and ground water.” (Forest Plan DWS-4, p. 2-10)  
□Desired condition: “Water quality, altered stream flow, and channel stability do not limit aquatic biota or associated recreational uses. Water in lakes, streams, and wetlands meets or exceeds State water quality requirements.” (Forest Plan, D-WS-5 p.2-10)  
□Objective: “Improve and protect watershed conditions to provide the water quality, water quantity, and soil productivity necessary to support ecological functions and intended beneficial water uses.” (Forest Plan, O-WS-1, p. 2-12)  
□Guideline: “Wetland impacts will be avoided whenever possible. Where impacts are unavoidable, minimize and compensate for loss when undertaking projects.” (Forest Plan, G-WS-13, p. 2-15)  
□Guideline: “Wetlands will be managed to prevent the reduction of their water quality, fish and wildlife habitat, and aesthetic values. Management actions will not reduce water quality within a wetland, or upstream or downstream of a wetland, unless restoration of natural conditions is the primary goal of the activity.” (Forest Plan, GWS-15, p. 2-15)

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**Comment Number** LE 282-59

**Commenter Name** Paula Maccabee

**Comment** □Discharge of sulfates, metals and other contaminants to groundwater, identifying with specificity all potential violations of groundwater standards, Health Risk Limits, or health advisories, including potential human health consequences;

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**Comment Number** LE 282-60

**Commenter Name** Paula Maccabee

**Comment** □Discharge of sulfates, metals and other contaminants to surface water, identifying with specificity all potential degradation of surface waters as well as all potential violations of water quality standards, including consequences for aquatic ecosystems, drinking water and human health;

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## WAT      Water Resources

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**Comment Number** LE 282-61

**Commenter Name** Paula Maccabee

**Comment**      □ Impacts of discharge of sulfates to water and air, discharge of mercury to water and air, wetlands disruption, and hydrological change on increases in methylmercury in fish, including consequences for piscivorous wildlife and for human health, including the health of infants, children and subsistence fishing communities;  
□ Impacts of sulfate discharge on waters with natural stands of wild rice, including potential violations of water quality standards and impacts on water quality, wildlife and fish habit and Tribal resources as a result of such impacts;

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**Comment Number** LE 283-5

**Commenter Name** Margaret Watkins

**Comment**      The Feasibility Analysis (FA) does not appear to analyze water quality, Surface waters in the watershed of the federal land proposed for exchange drain into Lake Superior via the Partridge River and St Louis River. Both the St. Louis River and the Partridge River are wild rice waters, The State of Minnesota (the State) and the Fond du Lac Band maintain water quality standards on the St. Louis River. The State protects all ground water as a source of drinking water.

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**Comment Number** LE 302-3

**Commenter Name** Kevin Proescholdt

**Comment**      The Forest Service needs to explain how the exchange helps it meet its goal of sustaining the nation's watersheds.

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**Comment Number** LE 307-4

**Commenter Name** Loni Kemp

**Comment**      The federal land that would be lost includes thousands of acres of high quality wetlands and habitat for endangered species including the Canada lynx and the gray wolf. The federal land drains into the Partridge River, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. up to 6,650 acres of the federal land could be exploited for mining.

In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, has few minerals and much of it has been heavily logged. For the taxpayer as well as for the environment, the PolyMet Land Exchange would not be a fair trade.

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**Comment Number** LE 315-13

**Commenter Name** Kevin Reuther

**Comment**      • Water quality impacts

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## WAT      Water Resources

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**Comment Number** LE 324-1

**Commenter Name** Daniel Mundt

**Comment** I have been long involved and concerned about what is being done with respect to the whole matter of surface and ground water.

In my opinion, the knowledge that we have of ground water, its circulation, and migration is not a very reliable source of information.

The concern that I have is the affect on the development of the large project that is being proposed and what that will do ultimately to not just the forest and the wetlands habitat, the availability of the use of land for the public, but more importantly the entire water supply situation.

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**Comment Number** LE 340-4

**Commenter Name** John Reed

**Comment** The SDEIS must examine every aspect of environmental harm from the Land Exchange, including water quality violations, increased mercury in fish, air pollution near the Boundary Waters and impacts on global warming from mining activities.

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**Comment Number** LE 420-2

**Commenter Name** Gretchen Flynn

**Comment** 400 jobs are important but not as important as clean water. If this mine is approved we run a terrible risk of permanently destroying a vital resource.

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**Comment Number** LE 424-1

**Commenter Name** Dale F. Johnson

**Comment** In the environmental review it is imperative to quantify the risks involved in the release of any toxic chemicals into the watershed. I grew up in Voyageur's National Park and know quite well that virtually all the water ends up in the lakes. Any detention of toxic chemicals from the mining operations are subject to overflow from heavy rainfalls that are common occurrences in this area. The effects of releasing these chemicals into the watershed must be known and acknowledged in order to adequately evaluate the true costs of the mining operations.

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**Comment Number** LE 431-2

**Commenter Name** Sherry Phillips

**Comment** The potential exists for continued degradation of the existing watershed in this area. The fact that parts of this area are already impacted by mining activities does not in itself justify impacting what is left of lands that provide some buffer between the Partridge River and existing mining. Acquiring lands in exchange to protect watersheds - such as the Hay Lake area - are important. But why would 6,000 plus acres in the Partridge River drainage- with functioning wetlands - be a candidate for exchange out of public ownership?

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## WAT      Water Resources

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**Comment Number** LE 448-1

**Commenter Name** Dorie Reisenweber

**Comment** Minnesota is the land of a thousand lakes, countless rivers and streams, innumerable bogs and sloughs and aquifers. Water is the source of life. It is vital to preserve water quality and to prevent water pollution for present and future generations. It is part of the job of the forestry service. Minnesota depends on you.

The lands of the Arrowhead region contain various water bodies throughout, all of which eventually end up in the Boundary Waters or in Lake Superior. All life in the region---plant, animal, human---all life relies on that good water quality for its existence..

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**Comment Number** LE 450-1

**Commenter Name** DAVID REISENWEBER

**Comment** The proposed forest service land exchange to facilitate sulfide mining is plain stupid. This is not the area to attempt to prove that this type of mining can be done without polluting the surrounding waters. This technology has never been proven. All water from these proposed areas drains either into Lake Superior or the Boundary Waters. Protecting these areas is much more important than mining these areas.

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**Comment Number** LE 457-1

**Commenter Name** Jane Koschak

**Comment** Sulfide metal mining is a new kind of mining proposed for water rich Minnesota. No where else in the world has this type of mining occurred without destruction to the environment and natural resources. Sulfide metal mining's potential for pollution is directly tied to the presence of water. It has usually been done in more arid climates than Minnesota's, and even in those dry areas, the mining has still created enormous toxic messes.

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**Comment Number** LE 460-1

**Commenter Name** Elizabeth LePlatt

**Comment** There would also be a huge threat to the quality of the water in the region.

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**Comment Number** LE 482-2

**Commenter Name** LeRoger Lind

**Comment** Lake Superior is designated as an Outstanding High Resource Value water body and as such has certain protections that exceed EPA standards for drinking water in other areas. For instance, the discharge standard for mercury is .2 nanograms per milliliter with a zero discharge goal by 2020. The St. Louis River that would be the tributary most likely to transport mercury from this project into Lake Superior is significantly above this value now and will soon be placed under a mercury TMDL to coincide with the statewide mercury TMDL currently in process. Sulfates, mercury and heavy metals are currently draining from the old LTV tailings basin associated with this project into the watershed. This project would significantly increase all of these pollutants according to comments from experts and the U.S. EPA submitted early in 2010.

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## WAT      Water Resources

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**Comment Number** LE 485-2

**Commenter Name** JoAnn M. Olson

**Comment**                Polluting the water and environment far outweigh the economic benefits of 400 jobs to the region.

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**Comment Number** LE 485-3

**Commenter Name** JoAnn M. Olson

**Comment**                It's seems to be such a short sighted approach to the health and longevity of the environment which ultimately affects the quality of life of everyone who lives, works and plays in the region. Moreover, water systems are not bound by state lines. Water quality in Minnesota affects water quality in the upper Midwest, nationally and globally.

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**Comment Number** LE 485-8

**Commenter Name** JoAnn M. Olson

**Comment**                1) Mercury. Increased levels of sulfates leached from the PolyMet Mine will increase mercury accumulated in fish tissues, causing harm not only to the fish but to animals and people who eat the fish. The DEIS did not adequately analyze the potential impact of the mine on mercury levels in surrounding waters and fish.

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**Comment Number** LE 485-10

**Commenter Name** JoAnn M. Olson

**Comment**                3) Wild Rice. The PolyMet Mine will result in enormous sulfate releases that will exceed the state standard for wild rice, which is sensitive to sulfates. These sulfates will likely eliminate wild rice in the Partridge and Embarrass Rivers, and diminish the famous wild rice beds in the St. Louis River estuary near Duluth, which is 100 miles away from the mine. The DEIS did not adequately analyze impacts on wild rice and the associated health and economic impacts.

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**Comment Number** LE 585-7

**Commenter Name** Bradley Sagen

**Comment**                Future mineral development must be considered part of the connected action. It is noted that additional lands may well be in the Kawishiwi Watershed which would lead to additional wetlands and water quality issues, and to possible impacts on the BWCAW.

Conclusion. The scoping document should be revised to identify additional issues raised by the inclusion of additional lands (3840 acres) in the exchange. These issues include additional wetlands and watersheds and possible impacts on the BWCAW.

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**Comment Number** LE 587-3

**Commenter Name** Alan Muller

**Comment**                It appears that the lands proposed to be exchanged to PolyMet would be within the Lake Superior drainage basin, whereas many of the lands proposed to be added to federal holdings would be outside the Lake Superior drainage basin.

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## WAT      Water Resources

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**Comment Number** LE 595-2

**Commenter Name** Dale Tranter

**Comment** My biggest concern relates to the potential for the destruction of the area's pristine surface and ground water resources. Once damaged, it will take generations to restore the damaged waters to their pre-mining conditions. In addition, the damage that the contaminated waters cause to the wildlife that depend upon them will also be great and potentially irreversible.

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**Comment Number** LE 598-4

**Commenter Name** Karen Updegraff

**Comment** Water quality concerns are also central. The Partridge River drains, through the St Louis River, into Lake Superior. Both the river and the lake, especially in the vicinity of Duluth, are the focus of serious concerns regarding bioaccumulative toxics (per the MPCA 303(d) list). There is a demonstrated significant risk that sulfide mining will result in long-term acidification of drainage waters, and neither PolyMet nor any other mining company has convincingly demonstrated that such drainage can be effectively mitigated over the long term. In allowing the land exchange and the mining activity to go forward the USFS knowingly contributes to long-term toxicity issues in the St Louis River.

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**Comment Number** LE 619-2

**Commenter Name** Steven Garske

**Comment** To start with, this land exchange would facilitate the destruction of over 1000 acres of high quality lowland conifer forests, wetlands and bogs, and damage and pollute thousands more acres of adjacent land. In comments highly critical of this mining proposal, the EPA has pointed out that these lands qualify as aquatic resources of national importance (ARNI), and that a strip mine would severely degrade them. The Minnesota County Biological Survey (MCBS) has identified the site of this proposed mine as being highly significant in terms of unique habitat, biodiversity, downstream water quality, and flood control. Trading this land to Polymet will result in destruction of this pristine area and the permanent loss of the environmental benefits it provides.

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**Comment Number** LE 619-3

**Commenter Name** Steven Garske

**Comment** The impact of this mine would extend far beyond the mine site, as acid mine drainage laced with heavy metals would undoubtedly make their way down the watershed to the Partridge and Embarrass Rivers, and on to the St. Louis River and Lake Superior. Sending acid mine waste into Lake Superior may be a violation of international treaties and is totally unacceptable. And digging a huge open-pit sulfide mine in the middle of a huge wetland complex is an insane idea.

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## WAT      Water Resources

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**Comment Number** LE 625-2

**Commenter Name** Paul and Susan Schurke

**Comment** Fortunately, federal oversight agencies acknowledge these concerns. They've required Polymet to revamp their EIS and find better ways of coping with acid-leaching mine tailings. Frank Ongaro, head of Mining Minnesota, notes that our state has such stringent environmental oversight in place that if there's a problem with this project, these agencies will catch it. He's right and they did. The EPA found that this project "will result in unacceptable and long-term water quality impacts."

Polymet has one more chance to "do it right." And so do we: as they prepare their supplemental EIS, let's insist that Polymet guarantee us that this project will not contaminate our ground and surface water. With the USFS now involved, we can send our concerns to our friends and neighbors at the Kawishiwi Ranger District office. As guardians of the world's most popular and beloved watershed wilderness, they are surely as concerned about these issues as we are. Just send a note to kawishiwi@fs.fed.us saying, "Please ensure that the proposed mining projects do not pollute our watershed."

Yes, Ely needs jobs and the world wants copper. But we're not desperate enough yet that we'd risk the health of our great grandchildren in exchange for that...are we?

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**Comment Number** LE 627-3

**Commenter Name** Betsy Daub

**Comment** The federal lands proposed to be exchanged out of public ownership are located within the Lake Superior Watershed. Waters from these lands drain into tributaries to the St. Louis River, which in turn flows into Lake Superior.

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**Comment Number** LE 627-6

**Commenter Name** Betsy Daub

**Comment** Two of the non-federal candidate tracts for acquisition are located outside the Lake Superior Watershed. At least three of the candidates are outside the St. Louis River Watershed. The exchange would result in an actual loss of positively contributing wetlands to an important watershed. While candidate lands bring wetland values in different watersheds, they are already existing wetlands that are adding value at the present time. They just are not within public ownership. Through this exchange, Minnesota and the nation lose, but do not gain, wetland function values.

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**Comment Number** LE 627-8

**Commenter Name** Betsy Daub

**Comment** Sustaining Watersheds - Water Pollution  
While the proposed land exchange does not directly create water pollution, the exchange inevitably leads to the development of a mine that has projected long-term water pollution issues associated with it. The loss of this land from public ownership leads to activities that have real implications for the health of the St. Louis and Lake Superior Watersheds.

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## WAT      Water Resources

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**Comment Number** LE 627-9

**Commenter Name** Betsy Daub

**Comment** Proposed mine activities would result in permanent storage of reactive waste rock above ground, with DEIS projected pollution for as much as 2,000 years. Groundwater criteria for a number of contaminants are expected to be exceeded according to the DEIS. Storage of overburden and peat are also projected to promote the methylation of mercury. The West Pit, to be located on the federal lands now under proposal for exchange, would eventually flood with groundwater, precipitation and surface runoff, and overflow into the Partridge River, a tributary to the St. Louis River. This overflow is expected to contain mercury, arsenic, cobalt and selenium in exceedance of water quality standards. Much of the St. Louis River downstream from the Partridge and Embarrass Rivers are already listed as mercury impaired. The mine project would compound an already serious contamination issue for this watershed.

The Friends in our DEIS comments, as well as the U.S. Environmental Protection Agency (EPA) in their comments on the DEIS, indicate areas where proposed mitigation measures are unproven or inadequate to address these and other pollution sources. The failures were a factor in the EPA giving the NorthMet project its lowest ranking of Environmentally Unsatisfactory, Inadequate. This is a rating the EPA gives less than one percent of the time to projects of this type. It signifies that the project as currently proposed represents significant threats to the watershed.

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**Comment Number** LE 638-2

**Commenter Name** Unknown

**Comment** Water quality cannot ever be replaced.

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**Comment Number** LE 652-1

**Commenter Name** David Miller

**Comment** There is indisputable evidence that access to clean water in the near future will become more and more restricted for the vast majority of humanity. This water crisis is already being experienced many places around the globe.

We need clean water to live healthy and rewarding lives. High-sulfide mining has proven to be a destroyer of water for generations in the areas where it has been employed.

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**Comment Number** LE 681-1

**Commenter Name** Patricia Holmes

**Comment** Such a Land Exchange, if approved, would destroy over 1000 acres of important wetland systems as well as thousands of acres of the Superior National Forest. Not only would we lose the biodiversity this ecosystem supports, but the watershed that empties into Lake Superior would be polluted by toxic chemicals that leach from the abandoned mining waste.

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## WET Wetland Resources

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**Comment Number** LE 001-3

**Commenter Name** Larry Adams

**Comment** In addition to opposing the Land Exchange, I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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**Comment Number** LE 001-6

**Commenter Name** Larry Adams

**Comment** • The SDEIS must consider PolyMet's actual proposed use of the federal land - open pit sulfide mining and potential exploitation of the entire site - in determining what the public would lose in the exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 009-5

**Commenter Name** Wanda Ballentine

**Comment** Meanwhile, PolyMet's proposed open pit sulfide mining and potential exploitation of the entire site clearly means that the public will lose an enormous amount in an exchange - thousands of acres of wetlands, habitat for endangered species, high quality forest, damage to tribal treaty rights and tribal resources.

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**Comment Number** LE 063-12

**Commenter Name** Kristin Larsen

**Comment** The land was purchased by our nation and the value of that land must be recognized in the most profound manner, it is the exact kind of land you should be acquiring. This land is an aquatic resource of national importance "due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin." The land is valuable because of where it is and because of its naturally created profound protective functions for the watershed. Its value is not just the current value of similar land but of this land positioned as it is - protecting the headwaters. To say you can substitute other land is akin to saying that 4 kidneys distributed among 2 persons, with 4 being in one body and 0 being in another body means the same as 2 kidneys in each body - and you can't just put a kidney in a foot and hope things work out - the watershed is as it is naturally for a reason - to purify and protect the great waters. You can't exchange wetlands in the manner you are attempting to do without harm to the greater ecosystem. The functions performed by the land are protective of the water - permanently - and do not have a cost to the public. We don't have to pay to have the headwaters purified - the land does that. This is the most important function that land can perform - and to ignore that is wrong and impermissible. Multiple parcels of land are being considered in this exchange, these multiple pieces are of far less value to the ecosystem and thus to the nation and its people.

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**Comment Number** LE 070-2

**Commenter Name** Janice Greenfield

**Comment** I am asking that specific analysis be done in the Supplemental Draft Environmental Impact Statement ("SDEIS"). If the SDEIS is done fairly and completely, it will demonstrate that the Land Exchange will result in irretrievable harm to wetlands, water, endangered species and tribal resources and does not serve the public interest.

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## WET Wetland Resources

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**Comment Number** LE 148-1

**Commenter Name** Margot Monson

**Comment** From an economic standpoint, the exchange of high quality federal forest and wetlands for non-federal land that has few minerals, some of which has been heavily logged, is simply not an equitable trade for taxpayers nor the environment. The result will be a large and comparatively short term benefit to a private corporation compared to the greater loss and, in many cases, permanent harm to natural resources valuable to Minnesota, the Great Lakes region, the BWCA, and our nation.

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**Comment Number** LE 151-1

**Commenter Name** Linda Morris

**Comment** You cannot replicate a wetland. Wetlands are needed to filter our water. Allowing PolyMet to swap land for wetlands is not in our best interest.

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**Comment Number** LE 170-8

**Commenter Name** Elanne Palcich

**Comment** How can there possibly be a land exchange process that would compensate for the character and quality of this loss? Places such as the 100 Mile Swamp are no longer being created. In fact, on the Iron Range these kinds of wetlands continue to be destroyed at an alarming rate. This goes against state law. Putting areas into conservation easements does not result in prevention of the loss of wetlands; it only protects some existing wetlands.

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**Comment Number** LE 227-6

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis of wetland losses resulting from the land exchange and PolyMet's mine proposal, including a full and thorough discussion of indirect wetland losses, such as was discussed but not thoroughly treated in PolyMet's 2009 DEIS.

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**Comment Number** LE 227-7

**Commenter Name** Matthew Tyler

**Comment** •Detailed analysis of the feasibility of the legally required wetland mitigation/replacement resulting from the land exchange and PolyMet's mine proposal.

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## WET Wetland Resources

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**Comment Number** LE 227-15

**Commenter Name** Matthew Tyler

**Comment** •Estimates of wetland loss in the Feasibility analysis are lower than those in the DEIS. This is apparently because the Feasibility Analysis fails to consider indirect wetland losses due to PolyMet's open-pit mining proposal, even though there is considerable discussion of the issue in the DEIS, and figures used to discuss wetland mitigation in the DEIS include indirect losses. At the mine site, the project is predicted to result in wetland losses of 854.2 acres attributable direct effects and 318.6 acres attributable to indirect effects, for a total loss of 1,123 wetland acres (DEIS, 4.2-24). Tribal agencies, however, disagreed, arguing that the indirect losses were under predicted. According to tribal agencies, indirect losses would be much larger because the DEIS falsely assumes that wetlands in the project area are unconnected to groundwater, despite vegetative data that suggests otherwise, and because the DEIS relies on mine dewatering studies conducted at shallower mines in upland areas.

•□ While the Feasibility Analysis discloses some of the results of the MnRAM Wetland Functionality Assessment for wetlands within Federal Lands, it does not disclose the results of the MnRAM Wetland Functionality Assessment for the Private Lands, other than saying that the wetlands "rated high for most wetland functions and values and wetlands on the private parcels share similar characteristics to those on the Mine site and additional parcel." (Feasibility Analysis, pg. 6-2, emphasis mine) It is absurd that PolyMet should expect us to take their word on this matter. To be at all credible, the report should have included a full table comparing the numerical results of the MnRAM analysis for all wetlands on the Federal & Private lands.

•□ It is also apparent that different versions of MnRAM were used to assess different groups of wetlands. If meaningful comparisons are to be made, the same version of MnRAM should be used throughout.

•□ It is unclear from the Feasibility Analysis whether detailed, in the field, wetland delineation using Army Corps of Engineers methodology occurred in the Additional Federal Parcel and on all of the Private Lands. In some passages, it is unclear whether wetlands were delineated using aerial photos, National Wetlands Inventory (NWI) polygons, or on the ground wetland delineation. It is also unclear whether there was 100% delineation, or whether sampling methods were employed. Reliance on Aerial Photos and NWI polygons instead of on the ground delineation is scientifically inadequate. NWI polygons are intended for large scale (~1:24,000) applications, not specific project analysis. As the NWI metadata states:

"Thus, the data are intended for use in publications, at a scale of 1:24,000 or smaller. Due to the scale, the primary intended use is for regional and watershed data display and analysis, rather than specific project data analysis. The map products were neither designed or intended to represent legal or regulatory products. ... There is a margin error inherent in the use of imagery, thus detailed on-the-ground inspection of any particular site, may result in revision of the wetland boundaries or classification, established through image analysis." (U.S. Fish and Wildlife Service, 2010).

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**Comment Number** LE 227-19

**Commenter Name** Matthew Tyler

**Comment** It is well understood that wetlands (open and forested), in particular, play a large and important role in maintaining downstream water quality and moderating flooding (Johnston et al. 1990, Mitsch & Gosselink 2000, etc.), although upland forests also influence water quality and especially quantity (e.g. experiments at Hubbard Brook LTER). Nonetheless, given their ecological and legal importance (e.g. the Clean Water Act & Minnesota Wetland Conservation Act), I focus here on wetlands.

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## WET Wetland Resources

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**Comment Number** LE 227-21

**Commenter Name** Matthew Tyler

**Comment** While informative, an accounting of total wetland acreage on Federal and Private Lands can not accurately assess water-related wetland ecosystem services. Instead, assessing these ecosystem services requires assessing the site specific hydrologic, biotic, soils, and landscape position factors as well as social values (Mitsch & Gosselink 2000). One legally recognized method to characterize these wetland ecosystem services is the Minnesota Routine Assessment Method for Evaluating Wetland Functions (MnRAM ; Minnesota Board of Water & Soil Resources 2010).

This method is continually revised, and is now up to version 3.3, although version 3.4 was released in beta in November of 2010.

While the Feasibility Analysis states that MnRAM assessments were done on at least some of the wetlands in the Exchange proposal, the authors did not share the MnRAM results nor make a detailed and thorough comparison of the numerical scores, as noted above.

One comprehensive approach to assessing the equality of the land exchange would be to compare the sums of the numerical MnRAM scores weighted by area. For example, a total score for each wetland function on the Federal Lands could be calculated by multiplying the numerical MnRAM score of each wetland by its acreage and then summing the products. The same calculation could be made for each function on the Private Lands. The total “functional-acre” scores of the Federal Lands and Private lands could then be compared in each function category. Furthermore, the function-acres scores should also be broken down by drainage basin, to reflect the fact that some of the wetlands involved are situation in different drainage basins.

However, the MnRAM Guidance document cautions that “the general and numeric ratings should not be summed or averaged across different functions (or for different wetlands)” (Minnesota Board of Water & Soil Resources 2010, p. 4). This is particularly true when comparing wetlands of differing types:

“Comparisons of function-by-function MnRAM ratings between different wetland plant community types (‘apples to oranges’) are problematic because different wetland plant community types function differently. Not all wetlands are flow-through wetlands, or shore land wetlands, or provide fish habitat, or support amphibians, or have a woody canopy. While some functions are provided by nearly all wetlands, the process and intensity of those functions can be different among different plant community types. Great care is advised when drawing conclusions from ‘apples to oranges’ comparisons. The greater the disparity between wetland plant community types, the less valid the comparison becomes. Comparing the functional levels of, for example, a precipitation-driven bog versus a floodplain forest is of little utility.” (Minnesota Board of Water & Soil Resources 2010, p. 4)

This suggests that perhaps MnRAM may not be the best methodology to address such a large-scale, quantitative problem. Still, summing the function-acres by wetland type and function would still be informative and should be done – using the same version MnRAM throughout.

But if MnRAM is not the best tool for the job, then what is?  
The MnRAM guidance document offers the following suggestion:

“For more difficult or controversial sites, it is recommended that a diverse team of professionals conduct the evaluation together or that other more detailed assessment methods be considered.” (Minnesota Board of Water & Soil Resources 2010, pg. 1)

Clearly, the land exchange is both controversial (as evidenced by more than 4,000 public comments on the DEIS), and complicated (thousands of acres of wetlands of varying types, locations, and hydrologic

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connectivity.) Other quantitative analyzes are in order in addition to a full accounting and comparison of MnRAM results.

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## WET Wetland Resources

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**Comment Number** LE 227-22

**Commenter Name** Matthew Tyler

**Comment**

One aspect of wetland function that is not dealt with particularly well in the MnRAM assessment is the landscape position and connectivity of the wetland relative to the open water bodies where water quality is measured. The scientific literature is pretty clear that landscape context can be very important to wetland impacts on water quality:

“Regional wetlands are integral parts of larger landscapes—drainage basins, estuaries. Their function and their values to people in these landscapes depend on both their extent and their location. Thus, the value to man of a forested wetland varies. If it lies along a river it probably has a greater functional role in stream water quality and downstream flooding than if it is isolated from the stream. If situated at the headwaters of a stream, a wetland would function in ways different from those of a wetland located near the stream’s mouth. The fauna it supports depend on the size of the wetland relative to the home range of the animal. Thus to some extent each wetland is ecologically unique. This complicates the measurement of its ‘value’.” (Mitsch & Gosselink 1993)

The point that the landscape position of a wetland relative to a body of water is important for determining the impact of the wetland on water quality is also echoed by the authors of a seminal study on the cumulative impact of wetlands on water quality and quantity in Hennepin County, Minnesota:

“Our results indicate the importance of considering wetland position in the landscape when evaluating cumulative function. All wetlands in a watershed do not behave alike with regard to water quality function, which may explain why previous attempts to relate percent wetland to drainage basin water quality have generally been unsuccessful (Whigham and Chitterling 1988). Wetland extent (PC1) was related to decreased concentrations of only three of the time-weighted variables on an annual basis, none of which were nutrients: chloride, lead, and specific conductance. PC2, which was related to wetland proximity, helped to explain decreased concentrations of five annual time-weighted variables (LGSPCND, LOGFCOL, FRDP, SQRTNO3, TSIS) and three additional flow-weighted variables (NH4, NOX, and TP). Therefore, the position of wetlands in the watershed appears to have a substantial effect on water quality, particularly with regard to sediment and nutrients.” (Johnston, et al. 1990, p 136, emphasis added).

In plain English, the study found that the proximity of a wetland to a stream was significant in explaining decreased levels of nitrate, ammonia, fecal coliform bacteria, suspended solids, and similar attributes, while the area of a wetland appeared to be significant in explaining decreased levels of lead and chloride.

A similar study on the impacts of wetlands on phosphorus levels in streams in the Lake Champlain Basin (Weller et al. 2003) drew similar conclusions:

“The largest improvements in the phosphorus load model occurred with the addition of riparian wetlands... These results are consistent with published hypotheses that riparian wetlands have the greatest potential to improve water quality because their location close to the stream network results in extensive interaction with both stream water and surface water runoff (Brinson 1988).” (Weller et. al 1996, p. 736)

While MnRAM does take into account the general hydrogeomorphic character of the wetland, it is but one factor among many, and it does not account well for the shape, orientation, size, and distance between the wetland and surface waters.

A thorough analysis of the relative effects of wetlands on the Federal and Private lands on water quality and quantity would thus need to be spatially explicit and site specific. This may be especially relevant if larger wetlands better reduce concentrations of heavy metals, since many rivers in northeastern Minnesota are already impaired by high levels of mercury. It may also be significant because the wetlands with the Federal Lands, which are part of the extensive 100-mile swamp complex, are within close proximity to the tailings piles to the north and may already be filtering and sequestering a significant amount of

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tailings drainage that would otherwise enter the Partridge River.

Furthermore, a visual comparison of the floodplain and wetland maps supplied in the Feasibility Analysis show that a very large percentage of the wetland acres within the Federal Lands are within a flood plain, while only a small percentage of the wetlands on the Private Lands are within a flood plain. Wetlands within a floodplain are more likely to have the type of extensive interaction with their respective streams described by Weller et. al., and are therefore more likely to have higher functional value in protecting water quality. In this regard, floodplain loss may be more damaging to water quality than loss of wetlands per se. If the Private lands were to be equally protective of water quality, they would need to include the same number of flood plain-situated wetlands as the Federal Lands.

In contrast, the lineal distance of shoreline and stream frontage calculated in the Feasibility Analysis is likely a less useful measure of wetland functionality because it does not reflect the area and quality of wetlands connected to the stream. Some streams, for example, have steep channels and rocky shores that allow for little flooding or other wetland interactions. Thin wetlands along such streams are more accurately classified as fringe wetlands, and do not play as important a role in maintaining water quality (although control of suspended sediments can be quite substantial).

In these two major regards, the Feasibility Analysis is most likely wrong in its assessment that “There would likely be minor loss in wetland function to the environment as a whole.” Given a potential loss to the Federal Estate of at least 1,472 acres of floodplain, that floodplain wetlands appear to be of high value for water quality, and that much of the lost floodplain would subsequently be destroyed or degraded by the PolyMet project, it is more accurate to say that there would be a major loss of wetland function to the regional watershed.

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## WET Wetland Resources

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**Comment Number** LE 227-23

**Commenter Name** Matthew Tyler

**Comment** There are many detailed, site specific and spatially explicit ways the water quality protection function of the wetlands involved in the proposed exchange can be measured and compared. Options include:

- ☐ Dye tracer and isotope tracer field studies to document the connectivity and filtration between individual wetlands and downstream locations. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events.
- ☐ Additional site specific, hydraulic and hydrologic field studies on both Federal and Private Lands to assess the connections between surface water in individual wetlands and the surficial and bedrock aquifers below them. This can be relatively easily done with clustered cased wells at varying depths. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events. The sixteen wells (DEIS Figure 4.1.8) used for the PolyMet DEIS study were inadequate to assess a more than 4,000 acre site.
- ☐ Additional site specific hydraulic and hydrologic field studies to assess the connectivity between the aquifers associated with individual wetlands and points just above rivers and streams. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events. The sixteen wells (DEIS Figure 4.1.8) used for the PolyMet DEIS study were inadequate to assess a more than 4,000 acre site.
- ☐ Additional collection of site specific precipitation and stream flow data to construct more detailed hydrologic models of both the Federal and Private Lands. These studies should be conducted so as to include seasonal variation, and precipitation, snow melt, and flood events. The models would need to simultaneously model surface water, groundwater, groundwater transport, and groundwater-surface water interactions. Two such models are the ADH and WASH123D models developed and validated by the US Army Corps of Engineers' Engineer Research & Development Center (Talbot 2005). From these calibrated models, the relative contributions and connectivity of individual wetlands could be estimated.
- ☐ Additional geologic borings and mapping of bedrock fractures that could create hydrologic connectivity between surficial aquifers, bedrock, and streams. Given the variability in the depth to bedrock on the Federal Lands (DEIS Documents: RS-2 Table 6, RS-74A p. 14-15) it is likely that water enters fractures in the bedrock and re-emerges beneath streams or other wetlands. Similar phenomena have been documented in pollutant transport studies at the Finland Air Force Base Superfund site near my home.
- ☐ Other appropriately rigorous methods suggested by a thorough literature search.

All such studies would need to be conducted thoroughly, using scientifically justifiable best practices, and in full consultation with Tribal Agencies. The analyses should also be conducted transparently, with data and preliminary results made publicly available. Finally, all tabulations of the results should clearly divide them into those benefiting the Lake Superior basin and those benefiting the Rainy River Basin; as well indicate which watersheds within the larger basins with which the wetlands are associated.

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**Comment Number** LE 277-9

**Commenter Name** Nancy Scholdt

**Comment** The Band is extremely concerned about the loss of high quality, even exceptional, wetlands within the federal estate, without sufficient information to understand whether the proposed nonfederal parcels provide equivalent functions and values. Clearly, there will be a net loss of over 1400 acres of wetlands under the proposed land exchange, including much of the Hundred Mile Swamp. The federal lands include 4,166 acres of high quality, undisturbed wetlands within the Lake Superior Watershed that would be permanently lost (the map and chart in the FA show all 2,827 acres of Hay Lake wetlands and most of the 1,259 acres of wetlands in the Wolf Lands parcels are outside the Lake Superior Basin).

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## WET Wetland Resources

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**Comment Number** LE 280-7

**Commenter Name** Esteban Chiriboga

**Comment** The FA correctly indicates that the wetlands in the lands that would leave federal ownership are exceptional in quality. The MNDNR report "Evaluation of Selected Potential Candidate Research and Natural Areas as Representative of Ecological Land type Associations on the Superior National Forest, Minnesota." indicates that the 100 mile swamp should be protected because it includes characteristic ecosystems for prominent ecological land types. Finally, field investigations by tribal staff have confirmed that the wetlands are of high quality and have been used in the past by native peoples.

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**Comment Number** LE 280-8

**Commenter Name** Esteban Chiriboga

**Comment** GLIFWC staff are concerned that the wetlands in the Hay Lake and other parcels, may not be of equal quality or provide equivalent functions and values. As previously indicated, water quality in the wetlands are important data needs for the NEPA process. In addition, the wetlands in the exchange parcels should be delineated and the functions and values determined to the same level of detail as the wetlands in the area of the proposed mine. The FA indicates that the federal estate would have a net loss of 1472 acres of wetlands if the exchange were approved. It is important to know the nature of the loss and gain in wetland quality, functions and values on public lands.

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## WET Wetland Resources

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**Comment Number** LE 282-46

**Commenter Name** Paula Maccabee

**Comment** The Feasibility Analysis suggests that there would be a net loss of approximately 1,310 acres of wetlands to the Federal estate and that, “Factors suggesting loss in wetland function to the Federal estate are judged to be much stronger than [sic.] those suggesting gains.” (Feasibility Analysis, Wetlands Section 10, 18 p. 3-1). These factors included the following:

□ The 1,337-acre net reduction in the number of forested wetland acres under federal management. The Feasibility Analysis suggests that there would be a net loss of approximately 1,310 acres of wetlands to the Federal estate and that, “Factors suggesting loss in wetland function to the Federal estate are judged to be much stronger than [sic.] those suggesting gains.” (Feasibility Analysis, Wetlands Section 10, 18 p. 3-1). These factors included the following:

7-acre net reduction in the number of forested wetland acres under federal management.

□ The sheer magnitude of the wetland function loss associated with the loss of 1,337 forested wetland acres is the strongest factor suggesting a net loss of wetland function. (Forested wetlands total 3,373 acres on the federal parcels and 2,036 acres on the nonfederal parcels.)

□ The 98-acre net reduction in the number of emergent and bog wetland acres under federal management. (Emergent and bog wetlands total 117 acres on the federal parcels and 19 acres on the nonfederal parcels.)

□ The large-block/contiguous nature of the federal parcel as opposed to the large block/small-block nature of the non-federal lands. The federal land consists of one large block of 6,621 acres of mostly contiguous ownership. This compares to two blocks of contiguous nonfederal ownership. The Hay Lake block is 4,760 acres and the McFarland block is 30 acres.

□ The loss of One Hundred Mile Swamp, an ecologically important bog wetland dominated by bog and forest bog wetland plants. The swamp is drained by Yelp Creek and the Partridge River. (Feasibility Analysis, Wetlands Section 10, pp. 3-1, 3-2).

Although the Feasibility Analysis Summary suggests that deed restrictions limiting future use on 1,310 wetland acres of the Federal land outside the PolyMet NorthMet mining area could prevent net loss of wetlands,<sup>19</sup> the Wetlands Section proposes nothing more than reliance on existing regulations to protect these additional wetlands from destruction after conveyance to private ownership. (Feasibility Analysis, Wetlands Section 10, p. 3-1).

In addition, the PolyMet Land Exchange would result in a net loss of 1,472 acres of floodplain to the Federal estate and 1,845 acres of floodplain associated with Yelp Creek and the Partridge River, including much of the One Hundred Mile Swamp. (Feasibility Analysis, Wetlands Section 10, pp. 2-1, 6-3).

In terms of functional value for downstream water quality and habitat, loss of wetlands within a specific watershed is of critical importance. The Federal lands have 4,166 acres of wetlands within the Lake Superior Watershed. All 2,827 acres of Hay Lake wetlands and most of the Wolf Lands 1,259 acres of wetlands are outside the Lake Superior Basin. Although not specifically discussed in the Feasibility Analysis, the PolyMet Land Exchange could result in loss to the National Forest of approximately 3,800 acres of wetlands within the Lake Superior Watershed. (Feasibility Analysis, Wetlands Section 10, Fall 2010 Update, pp. 2-3).<sup>20</sup>

The Feasibility Analysis also underestimates wetlands loss to the environment resulting from the PolyMet Land Exchange. It states that 864 acres of wetlands would be subject to wetland function loss due to the PolyMet project, assumes that the remaining 3,302 acres of wetlands on the Federal lands would be undisturbed and assumes that wetlands on the non-Federal land would likely become “more functional.” (Feasibility Analysis, Species and Habitat Section 8, 21 pp. 2-1, 3-1).

However, the best evidence available predicts the PolyMet Project would impact 1122.9 acres of wetlands on the Federal mine site through excavation, changes in hydrology, chemical inputs and other disruption.

## WET Wetland Resources

(PolyMet DEIS, pp. 4.2-9, 4.2-18). Likely use of additional acreage of the Federal parcel for iron or other minerals extraction would increase wetlands loss. Finally, no facts support the assumption that currently undeveloped non-Federal land would improve wetland functions as a result of an ownership change.

The Feasibility Analysis recognizes that 98 percent of the wetlands on Federal lands “were determined to have high overall quality due to minimal or no current disturbance, while disturbed wetlands accounted for less than 2 percent of all wetlands within the study area.” (Feasibility Analysis, Wetlands Section 10, pp. 5-2 to 5-3)<sup>22</sup> The PolyMet DEIS states that the PolyMet Project would impact 3.4 percent of the total wetlands in the Partridge River Watershed and acknowledges that, due to the high quality, relative isolation and lack of human disturbance of the wetlands impacted, “the function and values served by the wetlands in the watershed would be expected to be significantly affected” by the direct and indirect losses of wetlands from the PolyMet project. (PolyMet DEIS, p. 4.2-48). The SDEIS must thoroughly evaluate environmental impacts to wetlands and wetlands function.

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**Comment Number** LE 282-50

**Commenter Name** Paula Maccabee

**Comment** ☐ Delineation of the quality, ecology, nature and functionality within a particular watershed of all wetlands on the Federal and non-Federal lands.

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**Comment Number** LE 282-51

**Commenter Name** Paula Maccabee

**Comment** ☐ Specific identification of any portions of the Federal lands likely to be designated as aquatic resources of national importance (ARNI) and the functional reason for that ARNI designation.

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**Comment Number** LE 282-55

**Commenter Name** Paula Maccabee

**Comment** The SDEIS must also evaluate all foreseeable impacts of the proposed PolyMet Land Exchange, including but not limited to:  
☐ Destruction and impairment of wetlands, identifying the quality, classification and watershed functionality of any impacted wetlands;

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**Comment Number** LE 282-56

**Commenter Name** Paula Maccabee

**Comment** ☐ Adverse impacts on wetlands that may be aquatic resources of national importance (ARNI) under the Clean Water Act and adverse impacts on wetlands with reference to Executive Order 11990,<sup>23</sup> which precludes damage to wetlands unless no reasonable alternative exists and potential harms are minimized;

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**Comment Number** LE 282-61

**Commenter Name** Paula Maccabee

**Comment** ☐ Impacts of discharge of sulfates to water and air, discharge of mercury to water and air, wetlands disruption, and hydrological change on increases in methylmercury in fish, including consequences for piscivorous wildlife and for human health, including the health of infants, children and subsistence fishing communities;  
☐ Impacts of sulfate discharge on waters with natural stands of wild rice, including potential violations of water quality standards and impacts on water quality, wildlife and fish habit and Tribal resources as a result of such impacts;

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## WET Wetland Resources

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**Comment Number** LE 283-8

**Commenter Name** Margaret Watkins

**Comment** Field investigations and interviews by Tribal staff have confirmed that the wetlands within the federal lands have been used by Tribal members for centuries and are of high quality. The FA also notes that the wetlands in the federal lands are exceptional in quality. And, the MN DNR report "Evaluation of Selected Potential Candidate Research and Natural Areas as Representative of Ecological Land type, Associations on the Superior National Forest, Minnesota," indicates that the 100 mile swamp should be protected because it includes characteristic ecosystems for prominent ecological land types. Wetlands in the non-federal land parcels may not be of equal quality or provide equivalent functions and values. Accordingly, wetlands in the exchange parcels should be delineated and the functions and values determined with the same level of detail as the wetlands in the area of the proposed mine site.

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**Comment Number** LE 283-13

**Commenter Name** Margaret Watkins

**Comment** Surface and ground water quality of the Hay Lake parcel must be known to properly assess whether this parcel should be exchanged for existing federal lands.

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**Comment Number** LE 283-14

**Commenter Name** Margaret Watkins

**Comment** Determination of quality, functions and values of the wetlands in the non-federal parcels must be initiated.

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**Comment Number** LE 302-1

**Commenter Name** Kevin Proescholdt

**Comment** 1. Valuable Wetlands Lost - Over 1,000 acres of high quality wetlands will be destroyed by the mine should the exchange take place. Much of these wetlands are peatlands, wetlands that form over hundreds and thousands of years and play a critical role in water filtration and flood control. Peatlands also are critical in storing carbon that otherwise would contribute to global warming. The loss of these peatlands would increase Minnesota's state-wide carbon emissions by two percent. The Forest Service needs to explain how the proposed exchange helps it meet its goal of protecting water resources, sustaining watersheds, and addressing climate change.

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**Comment Number** LE 307-4

**Commenter Name** Loni Kemp

**Comment** The federal land that would be lost includes thousands of acres of high quality wetlands and habitat for endangered species including the Canada lynx and the gray wolf. The federal land drains into the Partridge River, which is a nationally important watershed for Lake Superior. Once the U.S. Forest Service no longer owns the federal land surface, PolyMet's massive copper sulfide open pit mine will destroy at least 2,840 acres, causing acid mine drainage, leaching toxic metals and damaging downstream wild rice stands, fisheries and estuaries. up to 6,650 acres of the federal land could be exploited for mining.

In contrast, the proposed non-federal land is almost entirely outside the Lake Superior Basin, has few minerals and much of it has been heavily logged. For the taxpayer as well as for the environment, the PolyMet Land Exchange would not be a fair trade.

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## WET Wetland Resources

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**Comment Number** LE 311-6

**Commenter Name** Ernest Lehmann

**Comment** • Provide additional federally owned wetlands.

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**Comment Number** LE 315-12

**Commenter Name** Kevin Reuther

**Comment** • Wetland impacts  
o Analysis of wetland type and value loss/expansion

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**Comment Number** LE 323-7

**Commenter Name** Paula Maccabee

**Comment** However, the Notice specifies that the proposed PolyMet Project would encompass 2,840 acres and that the exchanging the remaining 3,810 acres of National Forest land is proposed in order to “eliminate conflicts if minerals development were to expand in the future.” (pp. 62757-62758). The PolyMet proposal, alone, represents the largest wetlands destruction ever considered by the USACE out of the St. Paul District. The significance of the Land Exchange extends beyond the scope of the PolyMet proposal, potentially exposing 6,500 acres to strip mine development.

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**Comment Number** LE 324-1

**Commenter Name** Daniel Mundt

**Comment** I have been long involved and concerned about what is being done with respect to the whole matter of surface and ground water.

In my opinion, the knowledge that we have of ground water, its circulation, and migration is not a very reliable source of information.

The concern that I have is the affect on the development of the large project that is being proposed and what that will do ultimately to not just the forest and the wetlands habitat, the availability of the use of land for the public, but more importantly the entire water supply situation.

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**Comment Number** LE 356-10

**Commenter Name** Kristin Henry

**Comment** For instance, the Forest Service should not just compare the acreage of wetlands that it will exchange, it should also consider the ecological value of the wetlands. The Forest Service is proposing to exchange peat bogs. As noted below, peat bogs are rare wetlands that play a critical role in water filtration, flood control and carbon sequestration. The ecological value that these wetlands supply is significantly higher than other wetlands. The agency should do a thorough cost-benefit analysis so that it can adequately compare the true cost of giving up these wetlands for wetlands with lower wetland function value. In addition, the Forest Service should compare the impacts at a watershed level so the agency can compare the impacts to watershed dependent species.

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## WET Wetland Resources

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**Comment Number** LE 426-2

**Commenter Name** Bob Jackson

**Comment** You will know that Yelp Creek and the PartridgeRiverflow through seven of them. You will know that a huge wetland is going to be adversely affected for the foreseeable future.

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**Comment Number** LE 452-5

**Commenter Name** Randy Neprash

**Comment** 2. There has been insufficient analysis of the potential loss of the additional BUFFER lands (over and above the mine site) and loss of wetlands, either by mining or surface stockpiling of mine tailings. The additional federal "buffer" lands in the proposed exchange are to facilitate and expedite future mining.

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**Comment Number** LE 455-2

**Commenter Name** Kris Wegerson

**Comment** Please consider that the USACE St. Paul District has a basic compensation ratio for wetlands exchange of 1.5:1 in northeastern Minnesota. It does not appear that ample wetland acres have been included in the exchange.

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**Comment Number** LE 457-11

**Commenter Name** Jane Koschak

**Comment** 1.Wetlands cannot be created. How will the USFS loss of the 1000+ acres wetlands and the loss of the "one hundred mile swamp" for the creation of the proposed sulfide metal mine of PolyMet be made up?

2.How will the loss of wetlands and the loss of the 100 mile swamp affect and impact the water resources surrounding the proposed mine?

3.How will the loss of wetlands and the loss of the 100 mile swamp affect sensitive and endangered or threatened species such as the wolf, moose, and lynx and their critical habitat, including noise and the destruction of winter denning or shelter?

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**Comment Number** LE 462-5

**Commenter Name** Frank Ongaro

**Comment** In addition, the land exchange parcels will essentially add 393 acres of wetlands to the SNF. The 4173 acres of wetlands included in the land exchange will be replaced at a greater than 1 to 1 ratio.

Finally, the parcels proposed in the exchange are all located within the 1854 Ceded Territory. The exchange will improve the access for tribal hunting and gathering rights.

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## WET Wetland Resources

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**Comment Number** LE 494-1

**Commenter Name** Nicole Gallagher

**Comment** Potential loss of the additional BUFFER lands (over and above the mine site) and wetlands needs to be analyzed. We should assume they will be mined or destroyed by mining - or by the use of the surface for stockpiles, etc. The additional federal "buffer" lands in the proposed exchange are to facilitate and expedite future mining. This needs to be addressed in the EIS.

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**Comment Number** LE 499-1

**Commenter Name** Lois Norrgard

**Comment** The exchange of high quality federal forest lands and the very highest quality wetlands - peatlands - to a private company would be a huge loss to the public, impacting natural resources important to Minnesota, the Great Lakes Region and the public owners of these lands.

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**Comment Number** LE 516-2

**Commenter Name** Meghan Luke

**Comment** If the Land Exchange is approved, it would facilitate the destruction of over 1000 acres of high quality wetlands and thousands of acres of the Superior National Forest by a Canadian multinational mining company for a Copper-Nickel Sulfide Strip Mine. This would be the largest permitted destruction of wetlands since the Saint Paul District of the Corps began permitting wetland fill.

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**Comment Number** LE 516-3

**Commenter Name** Meghan Luke

**Comment** I am greatly concerned with the loss of wetlands and the loss of the "one hundred mile swamp;" with how exchanging federal lands for mining will impact water resources and affect sensitive species; and with loss of lynx critical habitat. Besides the loss of wetlands, there will be loss of open spaces, loss of forests, and loss of habitat for moose and threatened lynx and wolves.

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**Comment Number** LE 581-4

**Commenter Name** Steve Koschak

**Comment** Excerpted from the EPA letter dated February 18, 2010 to USACE Re: PolyMet NorthMet Project : "EPA finds this project may have substantial and unacceptable adverse impacts on aquatic resources of national importance (ARNI). EPA believes the coniferous and open bogs, comprising a large percentage of the approximately 33,880 total wetland acres, within the Partridge River Watershed to be an ARNI due to the values they provide in terms of unique habitat, biodiversity, downstream water quality, and flood control specifically, to the Lake Superior Watershed and the Great Lakes Basin."

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## WET Wetland Resources

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**Comment Number** LE 585-7

**Commenter Name** Bradley Sagen

**Comment** Future mineral development must be considered part of the connected action. It is noted that additional lands may well be in the Kawishiwi Watershed which would lead to additional wetlands and water quality issues, and to possible impacts on the BWCAW.

Conclusion. The scoping document should be revised to identify additional issues raised by the inclusion of additional lands (3840 acres) in the exchange. These issues include additional wetlands and watersheds and possible impacts on the BWCAW.

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**Comment Number** LE 585-9

**Commenter Name** Bradley Sagen

**Comment** Wetlands Protection  
NMLE includes portions of the 100 Mile Swamp and other wetlands which EPA believes to be ARNI (EPA letter of 2/18/10). These lands are under the surface jurisdiction of USFS and their continued protection must be considered in the SDEIS, as must the consequences for public lands and watersheds if wetlands were to be transferred to private ownership.

The NorthMet DEIS has acknowledged already that "the function and values served by the wetlands in the watershed would be expected to be significantly affected" by the direct and indirect losses of wetlands from the PolyMet project. (PolyMet DEIS, p. 4.2-48). The SDEIS must thoroughly evaluate environmental impacts to wetlands and wetlands function from the perspective of USFS obligations.

The potential ARNI designation raises the question of comparable quality and environmental value in the non-federal lands proposed for exchange. The current scoping document makes no mention of the quality of the non-federal lands proposed for exchange. The document does indicate, however, that federal wetlands are primarily contiguous while non-federal wetlands are in smaller tracts and several are outside the St. Louis River Basin.

Conclusion. The SDEIS must make clear how forest quality as it pertains to wetlands preservation will be maintained by NMLE and how the special protections afforded ARNI wetlands will be maintained.

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**Comment Number** LE 619-2

**Commenter Name** Steven Garske

**Comment** To start with, this land exchange would facilitate the destruction of over 1000 acres of high quality lowland conifer forests, wetlands and bogs, and damage and pollute thousands more acres of adjacent land. In comments highly critical of this mining proposal, the EPA has pointed out that these lands qualify as aquatic resources of national importance (ARNI), and that a strip mine would severely degrade them. The Minnesota County Biological Survey (MCBS) has identified the site of this proposed mine as being highly significant in terms of unique habitat, biodiversity, downstream water quality, and flood control. Trading this land to Polymet will result in destruction of this pristine area and the permanent loss of the environmental benefits it provides.

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## WET Wetland Resources

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**Comment Number** LE 619-3

**Commenter Name** Steven Garske

**Comment** The impact of this mine would extend far beyond the mine site, as acid mine drainage laced with heavy metals would undoubtedly make their way down the watershed to the Partridge and Embarrass Rivers, and on to the St. Louis River and Lake Superior. Sending acid mine waste into Lake Superior may be a violation of international treaties and is totally unacceptable. And digging a huge open-pit sulfide mine in the middle of a huge wetland complex is an insane idea.

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**Comment Number** LE 627-3

**Commenter Name** Betsy Daub

**Comment** The federal lands proposed to be exchanged out of public ownership are located within the Lake Superior Watershed. Waters from these lands drain into tributaries to the St. Louis River, which in turn flows into Lake Superior.

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**Comment Number** LE 627-4

**Commenter Name** Betsy Daub

**Comment** The federal lands include over 900 acres of coniferous bog and open bog peatland communities. Peatlands are wetlands that form over hundreds and thousands of years and play a critical role in water filtration and flood control. All the wetland communities in this exchange proposal are important in providing clean water and flood management in to the subwatershed of St. Louis and ultimately to the Lake Superior Watershed.

Should the exchange proceed, the development of a mine on this site would result in the direct destruction of about 586 acres and indirect impacts to at least 266 acres of peatlands (which may be an underestimation).

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## WET Wetland Resources

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**Comment Number** LE 627-5

**Commenter Name** Betsy Daub

**Comment** Overall, the federal lands in the proposal contain 4,166 acres of wetlands. A similar acreage of wetlands is proposed to be exchanged into public ownership. However, while the overall wetland acreage in public ownership remains largely the same, the exchange results in a real loss of over 800 acres of high quality wetland habitat through the development of the PolyMet mine. The actual wetlands losses are likely to be higher, given the predicted indirect wetland impacts, over 600 acres (e.g. hydrological changes), and that once in private ownership, these wetlands could be further impacted should the mining company decide to expand operations.

As part of our review of the NorthMet Draft Environmental Impact Statement (DEIS), the Friends worked with four technical experts with knowledge in the areas of geophysics, hydrology, geology, and wetlands and aquatic ecology (see The Friends PolyMet DEIS comments 2010 attached, for more detail). Two of these technical experts identified that the indirect wetlands impacts from the NorthMet project were likely underestimated. This underestimation comes from a mischaracterization of the wetlands in the project area, a lack of reliable groundwater modeling for groundwater drawdown impacts, and insufficient data collection to properly analyze groundwater flow. These failures of analysis could lead to a much greater impact on the hydrology of nearby wetlands than was projected in the DEIS.

In the public open house held in New Brighton on October 27, 2010 about this project, I asked Forest Service personnel about the characterization of the wetlands on the federal lands. There was acknowledgement from Forest Service staff that the way the NorthMet DEIS characterized the wetlands likely differs from the way the Forest Service characterizes them. The technical experts we worked with noted that the characterization of the wetlands in the DEIS as “perched bogs” rather than “fens” are a likely mischaracterization that could lead to increased indirect wetland impacts.

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**Comment Number** LE 627-7

**Commenter Name** Betsy Daub

**Comment** The analysis by the Forest Service needs to fully examine what net loss of wetlands will occur from this land exchange and what that loss means to the Lake Superior Watershed. The public should be fully informed that a land exchange will result in an actual loss of wetlands in Minnesota. Indirect impacts need to be more fully characterized. The Forest Service needs to articulate how they characterize the wetlands on the federal lands, how this may differ from the DEIS, and if those differences translate into additional wetland impacts. Hydrologic impacts to wetlands outside of the proposed exchange parcel should also be examined. The Forest Service should conduct a comparison analysis of the impacts from the potential loss and gain of wetlands in different watersheds. The results of this entire analysis should be used to examine whether the proposal meets this stated Forest Plan Goal of protecting the nation's watersheds.

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## WET Wetland Resources

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**Comment Number** LE 627-10

**Commenter Name** Betsy Daub

**Comment** Recommendation:

In the Friends' DEIS comments, we provided detailed recommendations for addressing pollution concerns affecting the watersheds of the St. Louis River and Lake Superior (see attached comments). The Forest Service in analyzing the potential impacts of the proposed land exchange and its impacts on the watershed, needs to fully understand changes in the Supplemental DEIS (SDEIS) being prepared at this time. The SDEIS is supposed to adequately respond to the concerns raised by the EPA and other organizations and individuals. Only in light of this additional analysis can the lasting effects of the land exchange be understood. If the SDEIS appropriately addresses watershed pollution concerns, then the impacts of the land exchange will be seen differently than if the SDEIS fails to address these issues. With the additional information, the Forest Service should examine whether the proposal meets the Forest Plan Goal of protecting the nation's watersheds.

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**Comment Number** LE 627-11

**Commenter Name** Betsy Daub

**Comment** Water Resources - Quality of Wetlands

The wetlands within the federal lands proposed for exchange are acknowledged to be of high quality. "Wetlands were rated high for nearly all wetland functions" (PolyMet Land Exchange Proposal Feasibility Analysis: Threatened, Endangered, and Sensitive Species and Habitat Assessment for the Proposed PolyMet Land Exchange, pg.6-1). So too are they rated high for their vegetation diversity and integrity, and high for their wildlife habitat value. They are considered high value habitat for amphibians.

The wetlands within the federal lands are part of an area identified in two separate assessments as being especially high value habitat. Scientists concluded the area known as the "100 Mile Swamp" represents some of the highest quality habitat remaining in the landscape.

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**Comment Number** LE 627-12

**Commenter Name** Betsy Daub

**Comment** While the Revised Forest Plan for the Superior National Forest did not adopt the concept of protecting representative natural areas in each landscape (LTA), it does not change the fact that these wetlands represent an important, rare feature within their landscape.

In evaluating the costs and benefits of a land exchange, we need to carefully examine if the public is gaining wetlands of equal or higher value. The scoping documents give very little information about the non-federal candidate lands under consideration. While the overall wetlands acreage is approximately equivalent, the information provided to date does not adequately describe the kinds of wetlands present on these tracts. The public has not been informed if they are peatlands of similar age and function. In one tract, there are no wetlands present at all. The scoping documents prepared by PolyMet, provide a small amount of information about only two of the non-federal candidate tracts, without data to verify the statement that the wetlands present were rated high for function and value.

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## WET Wetland Resources

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**Comment Number** LE 627-13

**Commenter Name** Betsy Daub

**Comment** Recommendation:

The Forest Service in its analysis needs to collect wetland information about all of the non-federal candidate tracts under consideration. Information comparing wetland quality and function to the federal lands needs to be provided. The non-federal lands need to be examined for the habitat value they add to their respective LTAs. The federal lands should be re-examined for their importance within their LTA. It is likely that since the evaluations of the 100 Mile Swamp were made in the late 1990s, the value of this habitat as an important representation has increased due to habitat losses elsewhere within the LTA. The public needs to be made aware of the federal lands' current value within their landscape. The Forest Service's evaluations also need to include the role these water resources play in habitat for at-risk species, such as amphibians. When the Forest Service considered protecting representative habitats across the forest in its Forest Plan Revision, it was applying sound concepts of conservation biology. These same concepts should be used again to assess whether the loss of this habitat in this landscape is offset by acquisition of habitat in other landscapes. Within this analysis, it needs to be highlighted that acquisition of habitat on the non-federal candidates do not actually provide new habitat (they already exist), while the land exchange would result in an actual loss of wetland habitat to the landscape within which the federal lands reside. All of this analysis should examine if the exchange meets the Forest Plan Goal of protecting and restoring water resources.

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**Comment Number** LE 627-45

**Commenter Name** Betsy Daub

**Comment**

The DEIS describes plans to mitigate wetland losses and greenhouse gas impacts associated with the wetlands destruction by "restoring high quality wetland communities of the same type, quality, function and value as those impacted by the Project" (DEIS pg. 4.6-33). And yet, the mitigation plan described fails to achieve that goal.

The DEIS notes that, "Given site limitations and technical feasibility, it is impractical to replace all impacted wetland types with an equivalent area of in-kind wetlands" (DEIS pg. 4.6-33). Despite the fact that most of the wetlands to be destroyed are open bogs and coniferous bogs (peatlands) the off-site mitigation acreage is "expected to exceed impacted acreage for all wetland types except for Type 8 (open bog and coniferous bog)" (DEIS pg. 4.6-33). So the type of wetland most impacted and most important for carbon sequestration, will be the least mitigated type of all.

The off-site wetlands selected for mitigating the NorthMet project's wetlands are at two distant sites near Aitken and Hinckley, Minnesota and contain very different characteristics than the wetlands to be destroyed by the project. The DEIS did not provide adequate documentation of all the sites evaluated for mitigation, making it impossible to determine why so many sites within the St. Louis River watershed were rejected.

The U.S. Army Corp of Engineers St. Paul District requires a wetland compensation ratio of 1.5:1. In other words, for every acre of wetland lost, 1.5 acres of wetlands must be replaced. The tribal cooperating agencies note that "the large acreage of wetlands to be directly impacted and the high quality of the wetlands warrant a mitigation ratio of greater than 1.5:1" (Tribal Cooperating Agencies, DEIS pg. 4.2-29).

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## WET Wetland Resources

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**Comment Number** LE 874-2

**Commenter Name** Diadra Decker

**Comment** In particular, the proposed exchange would violate the principle of "no net loss" of wetlands in the St. Louis River watershed, which has local, state, national and international importance as the largest U.S. tributary to the Lake Superior basin.

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**Comment Number** LE 877-1

**Commenter Name** Rebecca Nyberg

**Comment** Wetlands save the land that we call home (as the recent decades of destruction in Louisiana has proven) and purify the water that we--and other species--require for survival. Why would anyone want to take a chance on destroying them? Short-term profits will NEVER make up for long-term destruction of our precious ecosystem, and water is the number one life-sustaining element that we have been entrusted to protect.

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## **Appendix G**

### **Disposition of Issues**

PolyMet-USFS Land Exchange  
Appendix G: Table of Issue Statements

Table 6		
Issue Statement Numbers	Issue Statement with Referenced Submission and Comment Numbers	Issue Disposition
ALT 3	Exchange federal land for a single contiguous nonfederal parcel of at least 6,650 acres with higher ecological and monetary value. (249-6, 315-9, 433-1)	<b>Substantive.</b> Additional analysis regarding this potential alternative will be included in the discussion of alternatives in the SDEIS.
ALT 4	PolyMet would extract minerals through underground mining and other alternative methods of mineral extraction. (170-1, 277-3, 280-2, 283-15, 315-9, 356-6, 452-9, 555-5, 585-4, 627-50, 627-51)	<b>Substantive.</b> Additional analysis regarding this potential alternative will be included in the discussion of alternatives in the SDEIS.
ALT 5	Exchange federal land for multiple nonfederal parcels that have wetlands and habitat more similar to the federal land than the proposed nonfederal parcels. (260-1, 345-3, 505-2, 566-16)	<b>Substantive.</b> Additional discussion regarding this potential alternative will be included in the discussion of alternatives in the SDEIS.
ALT 6	Exchange only the land required for the NorthMet mine project instead of the 6,650 acres of federal land proposed. (315-9, 356-6)	<b>Substantive.</b> Additional analysis regarding this potential alternative will be included in the discussion of alternatives in the SDEIS.
CUI 1	The land exchange conflicts with the federal trust obligation to honor treaties and tribal rights to hunt, fish, and gather on the Federal parcel. (282-74, 305-10, 323-8)	<b>Substantive.</b> Additional analysis/mitigation regarding conflicts with federal obligations will be included in the discussion of Tribal Issues in the SDEIS.
CUI 2	With reference to tribal rights and interests, cumulative impacts and the no-action alternative have not been adequately analyzed. (282-4, 282-75, 587-5)	<b>Substantive.</b> Additional analysis regarding change or loss of cultural rights and interests will be included in the discussion of Tribal Issues in the SDEIS.
CUI 6	Changes or loss of access can significantly impact tribal rights to hunt, fish, and gather in the Ceded Territories. (249-2, 277-10, 282-65, 311-7, 462-6, 592-1)	<b>Substantive.</b> Additional analysis/mitigation regarding change or loss of tribal treaty access will be included in the discussion of cultural resources and/or Tribal Issues in the SDEIS.

Table 6		
Issue Statement Numbers	Issue Statement with Referenced Submission and Comment Numbers	Issue Disposition
LEG 3	The SDEIS should analyze mining operations that are consistent with federal surface ownership and compare them to the project proposed by PolyMet. (315-3, 315-5, 356-4)	<b>Substantive.</b> Additional analysis regarding alternative methods of mineral extraction will be included in the discussion of alternatives in the SDEIS.
AIR 1	Mining will increase levels of air toxins such as diesel, particulates, mercury, sulfate and asbestos-like fibers along with creating noise pollution and increasing greenhouse gasses causing global warming. (282-63, 340-4, 433-2, 627-14)	Non-substantive. This issue will be addressed in the Air Quality and Cumulative Effects sections of the SDEIS.
AIR 2	Increased amounts of haze could impact Minnesota's ability to comply with the Regional Haze State Implementation Plan. (282-63, 315-14, 356-12, 627-16)	Non-substantive. This issue will be addressed in the Air Quality section of the SDEIS.
AIR 3	Allowing mining in this area will significantly decrease the air quality in the Boundary Waters Canoe Area Wilderness. (1-7, 282-63 340-4, 627-15)	Non-substantive. This issue will be addressed in the Air Quality and Wilderness sections of the SDEIS.
AIR 4	Air pollution from the project may contribute to cancerous and non-cancerous health effects in humans. (282-61, 282-63)	Non-substantive. This issue will be addressed in the Air Quality section of the SDEIS.
AIR 5	Analysis of cumulative impacts to air quality must include reasonably foreseeable projects such as Mesabi Nugget Phase II or the Keetac Expansion. (627-17)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
AIR 6	Land exchange may conflict with the Forest Plan's objectives of protecting and restoring air resources. (627-18)	Non-substantive. This issue will be addressed in the Air Quality and/or Forest Plan Consistency sections of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
ALT 1	The USFS/SNF should consider leasing the land or collecting royalties. (305-15)	Non-substantive. This issue is not considered substantive because given the statutory framework for National Forest land acquisition and administration, as well as existing Federal case law; the Forest Service does not have the authority to allow, by decision, open pit mining as proposed by PolyMet. Consequently, the only way PolyMet's open pit mining proposal can be realized is for the Forest Service to exchange land with PolyMet. In addition, since the minerals are privately owned, the Forest Service cannot collect royalties on PolyMet's leased minerals.
ALT 2	The no-action alternative needs to be analyzed. (282-4, 315-8, 342-3, 566-13, 566-16, 629-4)	Non-substantive. This issue is not considered substantive because analysis of the No Action alternative is already required by law.
CCC 1	The effects of proposed mining and processing activities on global climate change must be analyzed. Provide assessment of the cumulative effects of global warming on the forest resources. (1-7, 282-64, 340-4, 356-16, 499-3)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CCC 2	Proposed greenhouse gas emissions may significantly impact the state's ability to achieve its goal of reducing greenhouse gas emissions to at least 80 percent below 2005 levels by 2050. (315-10, 356-15)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CCC 3	The Forest Service must fully analyze carbon sequestration impacts, including a full carbon accounting. (282-58, 315-10, 356-15, 627-42, 627-43, 627-44, 627-46)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUI 3	The land exchange may result in a net loss of lands in the 1854 Ceded Territory. (249-1, 249-4, 302-9, 585-12, 615-1, 627-58)	Non-substantive. This issue will be addressed in the Tribal Issues section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
CUI 4	The USFS/SNF has not analyzed Tribal Resource Management Plans with respect to the land exchange and must ensure that the intended use of conveyed Federal land would not conflict with established management objectives on adjacent Indian Trust Lands. (277-10, 282-36, 282-37, 282-39, 282-70, 282-75, 627-59)	Non-substantive. This issue will be addressed in the Tribal Issues section of the SDEIS.
CUI 5	Lands adjacent to and/or downstream of the proposed project are SNF lands within the Ceded Territories and impacts would affect management on adjacent Federal Lands and Indian Trust Lands. (63-7, 282-23)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUI 7	Communication with the bands regarding known/discovered resources of cultural importance, resource surveys, and consultation with the bands has not been adequate and is required under Section 106 of the NHPA. (227-14, 249-3, 249-8, 282-5, 282-66, 282-71, 282-72)	Non-substantive. Section 106 consultation with the bands is ongoing and will be documented in the SDEIS.
CUM 1	Existing disturbance of adjacent property [the mining district] does not justify creation of new impacts and may contribute to future disturbance. (312-2)	Non-substantive. This issue will be further developed and discussed in the Cumulative Effects section of the SDEIS.
CUM 2	The cumulative impacts regarding the fragmentation of federally owned lands would have negative effects on management effectiveness and integrity. (342-2)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUM 3	One of the cumulative effects of the current and future mines is to decrease the quality and quantity of the natural resources. (1-8, 282-4, 305-3, 342-6, 357-14, 627-17)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
CUM 4	Cumulative impacts, including impacts that assume the mining of the entire 6,650 acre Federal tract, need to be analyzed in the SDEIS. (1-8, 282-4, 323-7, 356-7, 356-8, 581-11)	Non-substantive. There are no proposals to mine the entire 6,650 acre Federal tract, making analysis of such an action speculative. The mineral potential of these lands also makes such a proposal unlikely. If a proposal to mine the remaining lands were made, a separate environmental analysis and permitting process would need to be completed.
CUM 5	A comparative analysis of water quality changes in the Lake Superior and Rainy River Watersheds should be conducted with and without the proposed land exchange. (227-10, 682-1)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUM 6	Cumulative effects analysis must consider the precedent this mine would set and include analysis of additional land exchange requests from future mining proposals. (305-2, 516-4, 555-4, 647-1, 704-6, 704-9)	Non-substantive. This issue is not considered substantive because future mining proposals are speculative and cannot be predicted. All land exchange proposals are evaluated on a case by case basis.
CUM 7	Detailed cumulative effects analysis must include impacts to regional threatened and endangered species, and habitat connectivity. (227-8, 566-1)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUM 8	Detailed cumulative impacts analysis must include impacts resulting from the full development of the Duluth Complex, tailings basins, and total areas of mine pits and waste piles. (397-1, 397-2)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUM 9	Impacts through the connected action of the Land Exchange and the mining project must be analyzed cumulatively. (585-3, 566-18)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
CUM 10	Analysis of cumulative impacts to air quality must include reasonably foreseeable projects such as Mesabi Nugget Phase II or the Keetac Expansion. (627-17)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.



<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
ECO 1	Consider non-monetary values [example: wetland function values and ecological resource values] when determining market value. (52-2, 63-12, 227-20, 356-9, 627-19, 874-1)	Non-substantive. Non-monetary values will be considered to the extent they are recognized in the real estate market. Other resource values and tradeoffs will be considered in the analyses presented in the SDEIS.
ECO 2	There is inequity in the value of trading away one large, contiguous parcel in exchange for smaller parcels of unknown ecological value. (249-7, 302-10, 627-39)	Non-substantive. This issue will be addressed in the SDEIS.
ECO 3	Comparison of the ecological function/value between the federal and non-federal parcels must consider current and potential contributions of the parcel. (627-6)	Non-substantive. This issue will be addressed in the SDEIS.
FEA 1	The Feasibility Analysis was incomplete, misleading, and contains misused terms such as “long-rotation” and “land adjustment”. (227-1, 227-17, 280-4, 282-45)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis.
FEA 2	The Feasibility Analysis was disingenuous regarding public interest and ignored the negative economic effects of the proposed project. (280-4, 282-45, 627-33)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis.
FEA 3	The Feasibility Analysis did not include wetland delineation methodology, wetland delineations for private land parcels, or consider indirect wetland losses. (227-15)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis.
FEA 4	The Feasibility Analysis should not be used as a basis for the SDEIS analysis. (227-17)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis.
FOR 1	High quality federal forest would be lost in exchange for land of uncertain/poor quality. (1-6, 9-5, 148-1, 324-1, 452-10, 457-13, 516-3, 682-4)	Non-substantive. This issue will be addressed in the Vegetation section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
FOR 2	For comparison purposes, comprehensive forest resource information must be gathered for the nonfederal parcels, including measurements of each parcel's income generation, long-term timber productivity, site index, soil value, site maturity, and general quality. (227-3, 282-33)	Non-substantive. This issue will be addressed in the Socioeconomic section of the SDEIS.
FOR 3	The parcels being traded to the USFS have endured previous clear-cutting or harvesting which diminishes their value. (148-1, 282-52)	Non-substantive. The appraisal will acknowledge timber values to the extent they affect market value.
FOR 4	The actual proposed use of the federal land would result in the destruction of high quality federal forest. (282-33, 1-2, 324-1)	Non-substantive. This issue will be addressed in the Vegetation section of the SDEIS.
FOR 5	The SDEIS needs to analyze the degree to which forest structure on proposed non-federal tracts complement or conflict with Forest Plan objectives and goals regarding forest resources. (227-4, 282-24)	Non-substantive. This issue will be addressed in the Forest Plan Compliance section of the SDEIS.
GSA 1	The SDEIS must contain comprehensive, candid, and specific analysis. (1-7, 70-2, 148-4, 282-49, 282-76, 498-1, 566-2, 566-19, 566-25, 581-10, 585-13)	Non-substantive. This issue will be addressed in the SDEIS.
GSA 2	The SDEIS must detail the existing nature and characteristics of all land proposed in the land exchange along with describing all possible environmental consequences. (282-49)	Non-substantive. This issue will be addressed in the SDEIS.
GSA 3	The SDEIS must present information about harms and benefits to the public, natural resource, tribal resources, wildlife, water quality, wetlands, climate change, financial assurances, and air quality. (1-3, 282-31, 302-12, 307-3, 340-4, 356-17, 598-2)	Non-substantive. This issue will be addressed in the appropriate sections of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
GSA 4	The SDEIS must assume that all 6,650 acres of Federal land would be mined by PolyMet. (356-7, 356-8)	Non-substantive. There are no proposals to mine the entire 6,650 acre Federal tract, making analysis of such an action speculative. The mineral potential of these lands also makes such a proposal unlikely. If a proposal to mine the remaining lands were made, a separate environmental analysis and permitting process would need to be completed.
GSA 5	The SDEIS must analyze all effects of mineral processing along with the no action alternative and all cumulative impacts such as the potential for future mining in this area and impacts on management objectives for adjacent and downstream federal lands. (282-4, 566-18)	Non-substantive. This issue will be addressed in the appropriate sections of the SDEIS.
GSA 6	The SDEIS must address the inconsistencies or misleading information within the Feasibility Analysis. (282-43)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis.
GSA 7	The SDEIS must better describe potential impacts of the proposed alternatives. (566-17)	Non-substantive. This issue will be addressed in the Environmental Consequences sections of the SDEIS.
GSA 8	The SDEIS must describe impacts resulting from the generation and transmission of power needed to run the NorthMet mine. (587-6)	Non-substantive. This issue will be addressed in the Air Quality sections of the SDEIS.
GSA 9	The SDEIS must describe the need for more copper. (605-1)	Non-substantive. This issue will be addressed in the appropriate sections of the SDEIS.
GSA 10	The SDEIS must describe potential mitigation through reduction of copper use and recycling efforts. (605-1, 683-1)	Non-substantive. This issue will be addressed in the appropriate sections of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
HAZ 1	The SDEIS should comprehensively evaluate the dump sites and potential tailings basin seepage on the Hay Lake non-Federal tract and ensure that the non-Federal parcels under consideration do not include hazardous substances. (277-4, 282-11, 282-13, 282-53)	Non-substantive. This issue will be addressed in the Hazardous Materials section of the SDEIS.
HAZ 2	The Feasibility Analysis did not include water quality impacts of the Hay Lake parcel, which is adjacent to the Minorca taconite pit that Arcelor Mittal Steel is currently using for disposal of tailings. (277-8, 280-6)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis. This issue will be addressed in the Hazardous Materials section of the SDEIS.
LEG 1	The Forest Service is exceeding its legal authority when it claims that it has any right or authority to impede surface mining on this land. (311-2)	Non-substantive. This legal conflict is not triggered if the land exchange proceeds.
LEG 2	The Forest Service hasn't demonstrated justification for accepting limited title or anything less than the fee simple title on proposed nonfederal parcels. (282-10, 282-18, 282-21)	Non-substantive. This issue will be addressed in the Land Use section of the SDEIS. In addition, title must be approved by the USDA, Office of the General Counsel.
LEG 4	Due to uncertainties about value and future use, an analysis should be done to determine whether the non-federal lands proposed for the exchange would also pose split estate or deed restriction issues. (277-5, 280-5, 283-11, 305-4, 323-6, 356-19, 452-8, 457-7, 499-2, 555-3, 566-15, 566-16, 627-48, 627-49)	Non-substantive. This issue will be addressed in the Land Use section of the SDEIS. In addition, title must be approved by the USDA, Office of the General Counsel.
LEG 5	If a mining company cannot propose an action that will comply with the state and federal water, air, and land regulations, the SNF must decide that any rights related to the mineral estate must not be exercised until the mining entity(ies) can truly guarantee compliance and clean water, air, and land. (53-3, 305-17, 356-2)	Non-substantive. This issue will be addressed through the analyses presented in the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
LEG 6	The Forest Service must demonstrate that the 6,650 acres of contiguous Forest Service land identified for exchange are “potentially available for conveyance” as defined in the land adjustment section of the Forest Plan. (282-29)	Non-substantive. This issue will be addressed in the SDEIS.
LEG 7	Removal of protections for lands acquired under the Weeks Act should not be permitted. (63-1, 170-1, 228-1, 266-3, 312-1, 381-1, 406-2, 431-1, 449-1, 452-1, 452-13, 456-2, 456-9, 457-5, 457-6, 516-1, 566-3, 566-4, 566-14, 581-6, 629-5, 629-6)	Non-substantive. Exchange proposals are evaluated on a case-by-case basis.
LEG 8	The Forest Service must demonstrate a need for exchange of lands, specifically the extra acres at the mine site. (452-5, 452-6, 555-2, 585-6, 619-5)	Non-substantive. This issue will be addressed in the SDEIS.
LEG 9	The SDEIS must describe the contingency of approval of the land exchange but not the mine project. (452-11)	Non-substantive. This issue will be addressed in the SDEIS.
MPD 1	Financial assurance may be inadequate for the environmental damages caused by this project, leaving taxpayers to pay for clean up. (151-2, 305-18, 312-3, 372-3, 381-3, 704-5, 704-8)	Non-substantive. This issue will be addressed in the appropriate section(s) of the SDEIS.
MPD 2	The mine project may result in impacts to human health. (63-8, 302-7, 305-13, 490-1, 587-2, 627-54)	Non-substantive. This issue will be addressed in the appropriate section(s) of the SDEIS.
MPD 3	Development of the mine will reduce wetland acreage and result in harm to water quality in wetlands/watersheds. (9-3, 63-8, 148-2, 170-7, 260-2, 302-2, 305-12, 323-5, 324-1, 340-2, 363-2, 372-2, 457-4, 486-10, 574-10, 581-4)	Non-substantive. This issue will be addressed in the Water Resources and Wetlands sections of the SDEIS.
MPD 4	The proposed project may impact the BWCAW. (148-2, 341-2, 341-4, 627-15, 627-16)	Non-substantive. This issue will be addressed in the Wilderness section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
MPD 5	The land exchange would enable development of a mine project with a DEIS previously rated as “environmentally unsatisfactory” by the USEPA. (170-2, 214-2, 280-3, 302-5, 356-5, 452-3, 627-9, 627-52)	Non-substantive. The Proposed Action that will be analyzed in the SDEIS has been modified from the one analyzed in the 2009 DEIS.
MPD 6	This type of mining may release dangerous heavy metals and other contamination into the environment, with impacts lasting an indefinite amount of time. (81-1159-1, 170-6, 202-3, 282-48, 302-3, 305-8, 305-9, 305-11, 305-16, 324-4, 381-2, 401-1, 446-1, 457-15, 544-1, 551-1, 559-1, 562-1, 564-2, 581-2, 581-3, 587-1, 590-8, 590-9, 608-2, 610-3, 611-2, 615-2, 617-2, 625-1, 626-1, 644-1, 661-1, 665-1, 681-2, 698-1)	Non-substantive. This issue will be addressed in the SDEIS.
MPD 7	Mining activities may impact current and future ability to safely hunt and gather in this area. (345-2)	Non-substantive. This issue will be addressed in the Tribal Issues and other appropriate sections of the SDEIS.
MRK 1	The exchange of high-quality forest would result in large and short-term windfall benefits to PolyMet and a permanent loss or to the public. (1-2, 1-4, 1-5, 6-3, 9-2, 9-4, 9-5, 9-7, 63-10, 148-1, 183-2, 277-4, 307-4, 340-1, 340-3, 370-3, 406-1, 458-2, 479-1, 484-1, 484-2, 516-4, 566-20, 581-5, 581-8, 585-2, 627-60, 874-1)	Non-substantive. This issue is not considered substantive because loss to the public will be analyzed in the SDEIS. The SDEIS will not analyze corporate profits.
MRK 2	A full consideration of fair market value and future land best-use must be made. (227-11, 282-2, 282-7, 282-8, 282-41, 283-16, 406-3, 452-4, 455-1, 456-3, 465-5, 482-6, 486-5, 486-6, 486-8, 505-1, 555-1, 574-2, 574-5, 574-6, 581-9, 590-6, 629-1)	Non-substantive. This issue is not considered substantive because analysis will be completed and this issue will be included.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
MRK 3	The monetary values, resource values, surface rights, and public objectives to be acquired must be equal or greater than those to be conveyed. (277-4, 280-8, 282-6, 282-9, 282-12, 282-17, 282-42, 315-4, 458-1, 462-4, 465-1, 566-6, 566-7, 566-11, 585-8, 590-5, 704-4, 704-5)	Non-substantive. This issue is not considered substantive because analysis will be completed and this issue will be included.
MRK 4	The value assessed to lands containing wetlands must consider the quality of those wetlands rather than the acreage of wetlands. (227-20, 280-8, 283-8, 356-10)	Non-substantive. This issue will be addressed in the SDEIS.
MRK 5	Some non-federal parcels proposed for exchange seem to offer little or no benefit to the public. (457-10, 590-4, 590-5, 682-5)	Non-substantive. This issue will be addressed in the SDEIS.
MRK 6	The Forest Service must disclose land values and parcel purchase history to the public. (566-4, 566-21)	Non-substantive. This information will not be disclosed in the EIS, but the Forest Service can provide this information upon request.
MRK 7	Due to the pollution risks associated with this type of mining, the Forest Service should acquire additional lands/value to compensate. (704-5, 704-8)	Non-substantive. The valuation will follow standard appraisal instructions according to agency requirements.
NPR 1	The SDEIS must provide an opportunity for additional land exchange comments after further information has been provided. (233-1, 277-2, 315-1, 324-5)	Non-substantive.
NPR 2	Concrete timelines need to be established for the [EIS and] permitting process to be completed. (273-3)	Non-substantive.
NPR 3	Scoping materials were inadequate. (269-1, 315-1, 585-1)	Non-substantive.
NPR 4	Additional time (beyond 45 days) is needed for scoping review. (323-19)	Non-substantive. Scoping comments will be accepted up to the publication of the SDEIS.



<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
NPR 5	Public meetings must be posted on the USFS/SNF website and notice sent out via email; meetings must be conducted in convenient locations such as Duluth and St Paul; and meeting format must include opportunity of open exchange of comments and views of cooperating agencies. (323-3, 353-1, 449-3)	Non-substantive.
NPR 6	The electronic comment sheet is not working. (346)	Non-substantive.
NPR 7	Under NEPA, the USFS/SNF must ensure that the SDEIS considers the land exchange and proposed mining project to be connected actions (with connected actions adequately explained) with impacts analyzed collectively, drawing upon other analysis done for impacts resulting from the proposed mine project. (227-24, 356-1, 356-17, 465-6)	Non-substantive. The land exchange will be analyzed as a connected action in the SDEIS.
NPR 8	If the SDEIS is to have legal or scientific credibility, it then must not rely on the Feasibility Analysis, but instead be a rigorous, independent analysis based in credible field inventories using best practices in the same manner as has been done for other SNF EISs. (227-13, 227-17, 305-1)	Non-substantive. This issue is not considered substantive because the Feasibility Analysis will be superseded by the SDEIS; it will not form the basis of analysis.
NPR 9	The Feasibility Analysis (and other specific information about the nature, history and character of the proposed federal and nonfederal lands), scoping materials, and the comments submitted on the overall EIS must be available for public review. (233-2, 233-3, 323-2, 323-9)	Non-substantive.
NPR 10	Combining the land exchange EIS with the mine project EIS does not provide the public with adequate time and opportunity to evaluate the land exchange impacts. (482-3, 687-1)	Non-substantive. The land exchange impacts will be fully addressed in the SDEIS. The SDEIS will be made available for public comment prior to any agency decision regarding the land exchange.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
NPR 11	The land exchange purpose and need must be adequately identified. (566-14, 566-15, 629-2)	Non-substantive. With the addition of the proposed land exchange to the SDEIS, the purpose and need statement will necessarily be revised to reflect the inclusion of this connected action.
PAC 1	Lands may become inaccessible to the public. (324-2)	Non-substantive. This issue will be addressed in the Land Use section of the SDEIS.
PLN 1	The land exchange conflicts with the Forest Plan's objectives related to vegetation. (282-3)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 2	The land exchange conflicts with the Forest Plan's objectives related to watersheds and water resources [Forest Plans D-WS-5 p2-10; O-WS-1 p2-12; G-WS-13 p2-15; GWS-15 p2-15]. (282-3, 282-32, 627-10)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 3	The land exchange conflicts with the Forest Plan's objectives related to wetlands [Forest Plans O-VG-4 p2-23; O-VG-16 2-24; O-VG-17 p2-24; O-VG-22 p2-26; O-VG-25 p2-27]. (282-33, 627-7)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 4	The land exchange conflicts with the Forest Plan's objectives related to threatened and endangered species [Forest Plans D-WL-3(c) p2-27; D-WL-3(h) p2-28; O-WL-4 p2-29; O-WL-8 p2-29; O-WL-11 p2-29; G-WL-1 p2-30; S-WL-1 p2-30, O-WL-11 p2-31, G-WL-22 p2-35]. (282-3, 282-34, 356-18, 585-10, 585-11)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 5	The land exchange conflicts with the Forest Plan by failing to follow land acquisition guidance criteria and management objectives by exchanging one contiguous block of prime habitat [O-LA-1]. (282-29, 282-30, 356-13, 566-10, 629-3)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
PLN 6	The land exchange conflicts with the Forest Plan by failing to keep surface and mineral estates together in order to protect the federal surface. (282-3, 282-19, 282-20, 283-3)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 7	The land exchange would require a Forest Plan amendment. (282-35, 282-38, 282-40)	Non-substantive. No Forest Plan Amendment or revision is proposed or needed. The Feasibility Analysis examined the consistency of the proposed land exchange with the Forest Plan. The SDEIS will address and disclose the consistency of proposed activities with the Forest Plan. The Record of Decision will provide rationale on how the land exchange and subsequent mining would relate to the public interest, if approved.
PLN 8	A cost-benefit analysis should be used to determine if the proposed action meets Forest Service strategic plan goals. (356-13, 356-14)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 9	Further analysis is needed to see if the land exchange provides equal value for water quality, water quantity, and flood control per the Forest Plan. (227-1)	Non-substantive. This issue will be addressed in the Water Resources and Land Use sections of the SDEIS.
PLN 10	The SDEIS must analyze obligations and compliance with the Forest Plan. (277-6, 282-4, 282-15, 282-36, 282-69, 282-73, 395-2, 566-25, 627-53)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 11	The Land Exchange will conflict with key objectives of the Forest Plan. (227-1, 282-16, 282-22, 282-25, 452-2, 486-1, 486-3, 486-4, 486-5, 486-6, 574-1, 574-3, 574-4, 574-5, 574-6, 585-5, 587-4, 598-3, 612-1, 627-1, 704-1, 704-2)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 12	The Forest Service must explain how the land exchange will comply with 36 CFR 254.1e and other regulatory policies. (566-5, 566-12, 566-24, 581-12)	Non-substantive. Compliance is required by law and will be addressed in the "Applicable Laws and Regulations" section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
PLN 13	The land exchange may conflict with the objectives in the Forest Plan regarding the goal of protecting and restoring air resources. (627-18)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
PLN 14	Lands should be exchanged only if alternatives, such as purchase, are unavailable. (704-3)	Non-substantive. As a connected action, the proposed land exchange is considered part of the proposed action and must be analyzed in that context. The Forest Service is not seeking to acquire or exchange lands, but is responding to a proposal from PolyMet.
SOC 1	The land exchange creates the loss of a potential tax base for Cook County. (343-2)	Non-substantive. This issue will be addressed in the Socioeconomics section of the SDEIS.
SOC 2	Locating a mine close to the BWCAW will negatively impact eco-tourism, recreation and real estate values in the area. (33-1, 170-13, 280-4, 457-17, 485-5, 627-55, 627-56, 627-57, 647-2, 677-1)	Non-substantive. This issue will be addressed in the Socioeconomics and Wilderness sections of the SDEIS.
SOC 3	It is uncertain how many jobs will be created locally and how many jobs will be filled by workers brought from other areas. (305-6)	Non-substantive. This issue will be addressed in the Socioeconomics section of the SDEIS.
SOC 4	More emphasis is placed on the value of local jobs than on the non-mineral uses of the Superior National Forest or the environmental consequences of the project. (305-6, 345-1, 508-1, 684-1, 685-1)	Non-substantive. This issue will be addressed in the Socioeconomics section of the SDEIS.
SOC 5	The SDEIS also needs to provide a description of the negative effects of a mining economy, such as the boom and bust cycles or reduction in tourism. (280-4, 699-3)	Non-substantive. This issue will be addressed in the Socioeconomics section of the SDEIS.
SOC 6	The number of jobs created by the overall project may not justify the environmental impacts. (420-2, 485-2, 591-3, 595-4)	Non-substantive. This issue will be addressed in the Socioeconomics section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
TES 1	There may be a net change of plant/animal species of federal concern to the federal estate. (282-47, 627-20)	Non-substantive. This issue will be addressed in the Vegetation and Wildlife sections of the SDEIS.
TES 2	Habitat corridors important to several threatened or endangered species (such as the Canada lynx and gray wolf) would no longer be protected if land is traded. (227-8, 282-62, 302-4, 307-4, 315-11, 356-11)	Non-substantive. This issue will be addressed in the Wildlife section of the SDEIS and the Biological Assessment.
TES 3	The USFS/SNF does not appear to be receiving comparable valuable wildlife habitat utilized by threatened and endangered species (such as the Canada lynx, gray wolf, bald eagle, and northern goshawk). (282-34, 356-11, 516-3, 627-19, 627-22, 627-24, 627-29, 627-31)	Non-substantive. This issue will be addressed in the Wildlife section of the SDEIS and the Biological Assessment.
TES 4	The land exchange will result in harm to threatened and endangered species. (1-3, 9-5, 148-2, 170-6, 282-34, 315-11, 566-23, 581-3, 585-10, 585-11, 610-2, 627-26)	Non-substantive. This issue will be addressed in the Wildlife section of the SDEIS and the Biological Assessment.
TES 5	The SDEIS should analyze how the exchange would affect recovery plan objectives for Canada lynx and gray wolf. (356-11)	Non-substantive. This issue will be addressed in the Wildlife section of the SDEIS and the Biological Assessment.
TES 6	A Biological Assessment has not been completed with consultation with the US Fish and Wildlife Service. (627-27)	Non-substantive. A Biological Assessment will be prepared by the USACE when a Preferred Alternative (i.e., Least Environmentally Damaging Practicable Alternative [LEDPA]) is identified as a part of the NEPA and Clean Water Act, Section 404 permitting processes.
VWH 1	The land exchange creates a loss of high quality forest, habitat for wildlife and threatened or endangered species, and wildlife corridors that provide habitat connectivity. (1-3, 1-6, 9-5, 63-5, 70-2, 227-9, 249-2, 282-26, 302-4, 307-4, 315-11, 356-11, 485-9, 499-4, 627-34)	Non-substantive. This issue will be addressed in the Wildlife section of the SDEIS and the Biological Assessment.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
VWH 2	The ultimate use of the federal land will impact many plant and animal species along with destroying fisheries, estuaries, and wild rice beds. Description of the negative effects of a mining on wildlife and vegetation need to be provided. (227-12, 249-2, 452-10, 619-2, 627-32)	Non-substantive. This issue will be addressed in the Vegetation and Wildlife sections of the SDEIS.
VWH 3	The nonfederal land does not appear to have equal quality or quantity of habitat, and biodiversity of vegetation and wildlife. (282-33, 282-34, 282-47, 282-62, 356-11)	Non-substantive. This issue will be addressed in the Vegetation and Wildlife sections of the SDEIS.
VWH 4	Mine operations will create a loss of game species in the area by destroying plant resources, habitat, and increasing the amount of mercury in fish. (249-2, 340-4)	Non-substantive. This issue will be addressed in the Vegetation, Wildlife, and Fish and Macroinvertebrates sections of the SDEIS.
VWH 5	Biological surveys, including the County Biological Survey for St. Louis County, have not yet been completed; its data is necessary to understand the biodiversity of this area which would be affected. (63-4, 282-54, 585-11, 627-35, 627-36, 627-37, 627-38, 682-2, 627-40)	Non-substantive. This issue will be addressed in the SDEIS.
VWH 6	The proposed project will have negative impacts on wild rice. (485-10)	Non-substantive. This issue will be addressed in the Vegetation, Wildlife, and Tribal Issues sections of the SDEIS.
VWH 7	Non-native and invasive species proposed for use in stabilizing disturbed areas may reduce diversity and lower overall habitat quality for wildlife and other plants. (627-21)	Non-substantive. This issue will be addressed in the Vegetation and Wildlife sections of the SDEIS.
WAT 1	Degradation or net loss of flood plains and/or flood plain wetlands would result in major loss of wetland function to the regional watershed. (63-12, 227-5, 681-1)	Non-substantive. This issue will be addressed in the Water Resources and Wetlands sections of the SDEIS.
WAT 2	The land exchange will result in harm and damage to water resources. (1-3, 70-2, 307-4, 315-13, 324-1, 420-2, 431-1, 595-2, 619-2, 619-3)	Non-substantive. This issue will be addressed in the Water Resources section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
WAT 3	Current surface water and groundwater quality has not been properly assessed. (227-23)	Non-substantive. This issue will be addressed in the Water Resources section of the SDEIS.
WAT 4	Cumulative impacts to water quality need to be analyzed. (280-6, 282-4, 585-7)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
WAT 5	Impacts to water quality resulting from the discharge of sulfates must be analyzed. (282-59, 282-60, 282-61, 429-1, 457-1)	Non-substantive. This issue will be addressed in the Water Resources section of the SDEIS.
WAT 6	Analysis of the importance of Federal and non-federal tract water quality and quantity should be conducted in the context of their regional watersheds. (227-5, 587-3, 627-3, 627-6, 627-8, 627-9)	Non-substantive. This issue will be addressed in the Water Resources section of the SDEIS.
WAT 7	The Forest Service must explain how the exchange helps meet its goal of sustaining the nation's watersheds. (302-3)	Non-substantive. This issue will be addressed in the Forest Plan Consistency section of the SDEIS.
WAT 8	Impacts to water quality will have consequences for aquatic ecosystems, drinking water, and human health. (282-59, 282-60, 282-61, 448-1, 482-2, 485-3, 485-8)	Non-substantive. This issue will be addressed in the Water Resources section of the SDEIS.
WAT 9	Key wetlands that protect the headwaters cannot be exchanged in the manner proposed without harm to the greater ecosystem. (63-12, 277-9)	Non-substantive. This issue will be addressed in the Water Resources and Wetlands sections of the SDEIS.
WET 1	The SDEIS will demonstrate that the land exchange will result in direct loss of, indirect loss of, or harm to high quality wetlands, such as those on the federal parcel, which cannot be replicated or replaced. (1-3, 1-6, 9-5, 70-2, 151-1, 170-8, 227-6, 227-15, 302-1, 307-4, 402-2, 402-3, 426-2, 457-11, 494-1, 499-1, 627-4, 877-1)	Non-substantive. This issue will be addressed in the Wetlands section of the SDEIS.
WET 2	Analysis of wetlands should include wetland type, ecological function, and value, in addition to acres that would be exchanged. (227-21, 227-22, 282-46, 315-12, 452-5, 627-5)	Non-substantive. This issue will be addressed in the Wetlands section of the SDEIS.

<b>Table 6</b>		
<b>Issue Statement Numbers</b>	<b>Issue Statement with Referenced Submission and Comment Numbers</b>	<b>Issue Disposition</b>
WET 3	A comparison of wetland value/ecological function is needed between the parcels being traded to and from the USFS. (63-12, 277-9, 280-8, 283-6, 283-14, 356-10, 627-7, 627-12, 627-13, 874-2)	Non-substantive. The executive order requiring no net loss of wetlands will be met. There is no requirement for wetland types or values to be traded equally. This issue will be addressed in the Wetlands section of the SDEIS.
WET 4	Methods used to delineate wetlands must be scientifically adequate to allow meaningful comparisons. (227-23)	Non-substantive. This issue will be addressed in the Wetlands section of the SDEIS.
WET 5	Water quality protection functions of wetlands need to be better assessed, using site specific hydrologic, biotic, soils and landscape position facts as well as social values. MnRAM is not the best methodology. (227-18, 227-19, 227-22, 227-23, 280-8, 282-32)	Non-substantive. This issue will be addressed in the Water Resources and Wetlands sections of the SDEIS.
WET 6	Loss of aquatic resources of national importance (ARNI) would adversely impact the Lake Superior watershed and/or the Great Lakes basin. (63-12, 227-10, 280-7, 282-27, 282-30, 282-50, 282-51, 282-56, 581-4, 585-9, 619-2)	Non-substantive. This issue will be addressed in the Water Resources and Wetlands sections of the SDEIS.
WET 7	On the Iron Range, wetlands similar to the 100 Mile Swamp are being destroyed at an alarming rate. (170-8, 627-11)	Non-substantive. This issue will be addressed in the Cumulative Effects section of the SDEIS.
WET 8	Legally required wetland mitigation/replacement must be analyzed in detail, including the possibility of replacement of similar wetland types and qualities. (227-7, 282-46, 455-2, 627-45)	Non-substantive. Legal requirements for both the mine and land exchange will be addressed in the Wetlands section of the SDEIS.



PolyMet-USFS Land Exchange  
Appendix G: Table of Information Requests

<b>Table 7</b>	
<b>Additional Information Requests</b>	<b>Submission and Comment Source</b>
Identify how the future use of the Federal estate by PolyMet for open pit sulfide mining represents “an environmentally sustainable” use of forest resources.	282-28
Detail the USFS’s plan for attention to the various emissions of pollution from mining onto the SNF, and have a plan of action to require treatment to meet standards and permit requirements through EPA.	305-16
Provide additional information on status of appraisals, ownership status, and current land use.	53-3, 227-11, 315-7
Provide additional information regarding land value and purchase history in context of comparison to other mining districts.	305-14
Provide additional general information on the land exchange and if additional information resources are available.	104-1, 53-1, 53-6
Make available to the public the DEIS comments (request for hard copies to be sent to commenter).	233-2, 233-3
Provide justification for sale of the Kawishiwi natural laboratory.	305-7
Provide detailed analysis and comparison of the degree to which the Federal and Non-Federal lands fulfill the 2004 Forest Plan’s objectives, and if the 2004 Forest Plan offers guidance on land exchanges.	227-2, 302-6, 302-4, 302-3, 302-8, 465-3
Provide additional information on surface and ground water quality on Hay Lake parcel.	283-13
Provide the St. Louis County Biological Survey for threatened, endangered, or special concern species.	63-4
Provide identification of the exact acreage of exchange – there are inconsistencies between scoping materials and PolyMet documents.	627-2
Provide discussion of Hay Lake mineral rights and likelihood of Hay Lake being mined in the future.	682-3