



MINNESOTA DIVISION IZAAK WALTON LEAGUE OF AMERICA

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Michael Jimenez
Superior National Forest All Units
8901 Grand Ave Place
Duluth, MN 55808

Dear Mr. Jimenez,

We are submitting these comments on the NorthMet Mining Project and Land Exchange Final Environmental Impact Statement (FEIS) on behalf of Izaak Walton League of America Minnesota membership. Izaak Walton League members are “Defenders of Soil, Air, Woods, Waters and Wildlife” – and we take this mission seriously. Collectively, our membership has poured many hundreds of hours into analyzing this PolyMet mine plan and land exchange, including the scoping, Draft EIS, Supplemental Draft EIS, and now this FEIS.

We object to the Draft Record of Decision for the NorthMet Land Exchange. We offer two overarching reasons to reject the land exchange entirely, and a further to reduce the land exchange to just that which is required for the project to proceed. We prefer that the exchange be rejected entirely.

- The Land Exchange should be rejected in the Final Record of Decision due to Weeks Act prohibition on surface mining. It is inappropriate to “resolve a conflict” with PolyMet over interpretation of the Act by simply giving in to them. Let them litigate.
- The Final Record of Decision should reject the Land Exchange as it conflicts with federal policy to protect wetlands. More than 900 acres of intact and high quality wetlands will be excavated, with thousands of acres more subject to drainage. The land exchange proposes to provide wetlands of a variety of types not within the impacted watershed. Furthermore, no mitigation is proposed for the drainage of thousands of acres of wetlands – this is left to a future decision. The net result of this proposed exchange will be a large loss of wetlands in northeastern Minnesota.
- The Land Exchange in the Final Record of Decision should be reduced to the Mine Site Exchange Alternative. It is wrong to facilitate air pollution by trading additional public lands to PolyMet so that air pollution will be diluted before air quality regulations are applied. PolyMet should instead invest in more air pollution controls, and the USFS should retain existing high quality lands in the public estate.

Thank you for the opportunity to comment on the proposed Record of Decision. We hope you take our comments into consideration and change the decision.

Sincerely,

Barry Drazkowski
President
Izaak Walton League of America – Minnesota Division

Mission Statement of the Izaak Walton League of America

To conserve, restore, and promote the sustainable use and enjoyment of our natural resources, including soil, air, woods, waters, and wildlife.