

December 20, 2013

Lisa Fay
EIS Project Manager
Division of Ecological and Water Resources
Minnesota Department of Natural Resources
Environmental Review Unit
500 Lafayette Road, Box 25
St. Paul, MN 55155
lisa.fay@state.mn.us

Douglas W. Bruner
U.S. Army Corps of Engineers
St. Paul District, Regulatory Branch
180 5th Street E, Suite 700
Saint Paul, MN 55101
douglas.w.bruner@usace.army.mil

Tim Dabney
USDA – Forest Service
Superior National Forest
8901 Grand Ave Place
Duluth, MN 55808
tdabney@fs.fed.us

RE: Northmet Supplemental Draft Environmental Impact Statement Comment Period

Dear Ms. Fay, Mr. Bruner, and Mr. Dabney:

On behalf of the undersigned organizations, Minnesota Environmental Partnership requests an extension of the NorthMet Supplemental Draft Environmental Impact Statement (SDEIS) comment period, from the current 90 days to 180 days. We also request that the co-lead agencies reschedule the public meetings for later in the comment period. At very least, a single additional public hearing should be scheduled toward the end of this extended comment period, in May 2014, to allow citizens to base their comments on a more thorough examination of the SDEIS.



An extension of the comment period is required for the following reasons:

The SDEIS is overly long

The document is 2200 pages long. Commissioner Tom Landwehr, at the December 6, 2013 press event, urged Minnesotans to take a “hard look” at it. An individual would have to read 25 pages a day before the end of the comment period to read the entire document and make informed decisions. The Executive Summary alone is nearly sixty pages. Additional time is required for adequate review by any individual.

The SDEIS is complex and substantive conflicts are unresolved

The SDEIS encompasses multiple projects, including the mine plant, the mine site, a tailings pond, a land exchange, transportation between the sites, financial assurance and offsite wetlands replacement projects. The document also contains substantive dissenting views, the Major Differences of Opinion documented extensively in Chapter 8.

The SDEIS is not written by or for laypersons

Court decisions say that an SDEIS should be “readily understandable by government decision makers and by interested non-professional laymen likely to be affected by actions taken under the EIS.” It should be in a “...clear, concise, easily readable form so as to provide a reasonably intelligent non-professional an understanding of the environmental impacts.”

The current document is not readily understandable, clear or concise. As written, it excludes many members of society from meaningfully participating in its review. Time is required for technical experts and communications experts to fully understand the material and make it accessible for a broader range of audiences.

Critical information in thousands of pages of references is not publicly available

While the SDEIS itself is designed to predict the environmental impact of the project, the predictions are only as good as the studies and analyses conducted by PolyMet and the co-lead agencies to support them. The public cannot meaningfully analyze and evaluate the co-lead agencies’ conclusions about the impacts of the mine without also evaluating the underlying references. Since these have not been provided to the public, it will take additional time for organizations and individuals to request the supporting documents, read, understand and disseminate these critical references.

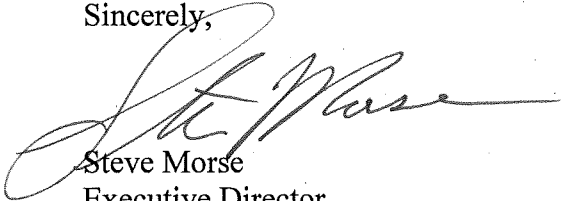
The SDEIS Cumulative Effects Assessment is insufficient

Tribal cooperating agencies emphasized the need for a more thorough cumulative effects assessment of mining on Lake Superior Basin resources. The undersigned groups and many others recently asked EPA Region 5 to engage in a new, broader analysis of the impacts of

mining on Lake Superior and the Great Lakes. Similarly, the International Joint Commission is looking at mining impacts on international waters in both the Great Lakes and the Rainy River watersheds. An extended comment period will allow the NorthMet project to be analyzed in a broader context.

Thank you for your attention to this request. I look forward to hearing your response in a timely manner.

Sincerely,



Steve Morse
Executive Director
Minnesota Environmental Partnership

Sam Chadwick
Advocate
Environment Minnesota

Rebecca L. Rom
Vice Chair
Northeastern Minnesotans for Wilderness

Mathew Anderson
Executive Director
Audubon Minnesota

Duane Ninneman
Senior Director
Clean Up the River Environment

Paul Austin
Executive Director
Conservation Minnesota

Elanne Palcich
Board Member
Save Our Sky Blue Waters*

Kristin Larsen
Executive Director
Friends of the Cloquet Valley State Forest

Paul Danicic
Executive Director
Friends of the Boundary Waters Wilderness

Tom Bell
Minnesota Ornithologists Union

Susan Sheridan Tucker
Executive Director
League of Women Voters - Minnesota

Brett Feldman
Executive Director
Parks & Trails Council of Minnesota

Robert DesJarlait
Director
Protect Our Manoomin*

Sister Gladys Schmitz
Mankato Area Environmentalists

Barry Drazkowski
President
Minnesota Division Izaak Walton League
of America

Mark Fink
Senior Attorney
Center for Biological Diversity*

Nancy Bratrud
President
League of Women Voters Duluth*

Le Roger Lind
Board President
Save Lake Superior Association

Margaret Levin
State Director
Sierra Club, North Star Chapter

John Lenczewski
Executive Director
Minnesota Trout Unlimited

Christina Hausman
Executive Director
Voyageurs National Park Association

Diadra Decker
Executive Director
Water Legacy

Josh Winters
Executive Director
MPIRG

Jane Cleave
President
Duluth Audubon Society

Scott Strand
Executive Director
Minnesota Center for Environmental
Advocacy

Deanna White
State Director
Clean Water Action

Steve Piragis
CEO and Founder
Piragis Northwoods Company*

* Affiliated organization, not a member of MEP

Cc: Tom Landwehr, Commissioner, Minnesota DNR
Brenda Halter, Supervisor, Superior National Forest
Col. Daniel Koprowski, District Engineer & Commander
USACE St. Paul District