

Comments on Draft NPDES Permits MN0055948 (U.S. Steel Keetac Tailings Basin) and MN0031879 (Keetac Mining Area)

To Whom It May Concern:

My name is Alessandro "Al" King, and I am writing in my capacity as President of USW Local 6115, representing the workers of Cleveland-Cliffs' Minorca Mine. I also write as someone who grew up on this land, supported by a father who was both a proud mining worker at Minorca and a member of the Bois Forte Band of Chippewa. Like many in northern Minnesota, I grew up eating and enjoying wild rice. I understand firsthand its cultural and ecological importance. I also understand the equally vital role that mining plays in sustaining families, communities, and our region's economy. Since the absence of a strong logging presence in Northern Minnesota, mining or mining related industry jobs are the last last pillar of the economic stability we have up here on the range.

A Common-Sense Approach is Needed

The Minnesota Pollution Control Agency's (MPCA) enforcement of the 10 mg/L sulfate standard is not a common-sense solution. No issue as complex as wild rice protection can be addressed with a "one-size-fits-all" approach. Nowhere in the real world does a single number solve every problem, because every water body and every ecosystem is different. Wild rice resilience is shaped by many factors—water depth, water fluctuation, competition with other vegetation, and natural cycles of growth and decline—not simply by sulfate concentration.

I urge MPCA to adopt a flexible, site-specific approach to wild rice protection that is rooted in modern science and actual field data, rather than clinging to a rigid and outdated standard. Current research shows that wild rice can grow and thrive in waters with sulfate levels far above 10 mg/L, including in Hay Lake, where Keetac has discharged for nearly 60 years and wild rice still flourishes.

Economic and Human Impacts

Mining is not just a business here—it is our way of life. It is how families like mine have been able to put food on the table and send kids to school, all while staying rooted in the land and culture of northern Minnesota. Our mines support more than 4,000 family-sustaining jobs, with wages nearly double the regional average, and inject \$1.8 billion annually into the state's economy. These jobs are not replaceable, and the communities they support cannot be asked to shoulder the burden of an unattainable, outdated sulfate rule that does not reflect reality.

Problems with the Draft Permits

The draft Keetac permits create unrealistic expectations by requiring compliance at each outfall, when all discharges ultimately flow into the same receiving water. A single compliance point would be more scientifically accurate and more practical. The compliance schedule itself is also unattainable: there are currently no proven, cost-effective sulfate treatment methods anywhere in the world. Forcing mines to meet this standard under such a short timeframe only sets the process up for failure, while diverting resources that could otherwise be invested into meaningful research and environmental solutions. This standard will also have to apply to all affected municipalities across the state as well. This will cause a push for grant money or other funds to help take the burden of the cost off these communities as it will expose the fact no entity either public or private can afford to meet this unscientific standard.

A Path Forward

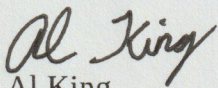
As both a labor leader and a lifelong resident of northern Minnesota, I call on MPCA to take a balanced approach—one that honors the cultural value of wild rice, while also respecting the economic lifeblood of the Iron Range. This means:

1. Refraining from enforcing an arbitrary 10 mg/L sulfate limit until a modern, science-based, site-specific standard is developed, as required by the 2011 law.
2. If limits remain, modify Keetac's permits to allow for a single downstream compliance point and a realistic compliance schedule that reflects the time needed for environmental review, permitting, and the development of feasible treatment options.
3. Recognizing the lived experience of those of us who grew up here—who value both wild rice and mining—and crafting policy that reflects the nuanced reality of northern Minnesota rather than a one-size-fits-all mandate.

Conclusion

This is about balance, respect, and common sense. It is about protecting both our environment and our livelihoods. The people of northern Minnesota know that both can coexist if given the opportunity for real, science-driven solutions instead of rigid, impractical rules.

Respectfully submitted,



Al King

President, USW Local 6115