

MICHAEL BAKK

My name is Mike Bakk and I live in Mountain Iron with my two teenage sons. I was born and raised in northeastern Minnesota and I'm proud to be an Iron Ranger. I am the senior director of mining operations at U. S. Steel. I am also the co-chair of the Iron Ore Alliance, a joint initiative between the United Steelworkers and U. S. Steel. Prior to this, I was the director of operational readiness at U. S. Steel's Keetac facility in Keewatin, where I worked on the DR-grade pellet project. The infusion of \$150M into Keetac breathed new life into the facility and lets us be at the front end of the electric steelmaking process. With over 25 years in the mining industry, I have seen firsthand how poorly informed regulations impact not only the sustainability of our businesses but the livelihood of the people and communities that rely on them.

I am writing today regarding the draft NPDES permits for the Keetac tailings basin and mining area. My concern lies with the MPCA's proposal to enforce the current 10 mg/L sulfate standard – a scientifically outdated and short-sighted rule that threatens jobs and communities across Northern Minnesota.

I know the human impact that this enforcement would have all too well. During a past downturn at Keetac, I was in the difficult position of laying off workers. One employee stopped in my office on his way out the door to thank me for hiring him – just hours short of completing his probationary period. Another longtime worker reminded me, "When these places shut down, you never know if they'll open again." These moments stay with me because they underscore the real and lasting consequences of well-meaning requirements.

Keetac has weathered ups and downs since 2008, driven largely by supply and demand in a global market. Adding an expensive and ineffective sulfate treatment requirement would cripple our global competitiveness. I'm a firm believer in preserving our environment. But the 10mg/L standard does not achieve its intended purpose. Modern science shows that wild rice survival depends on a variety of site-specific factors including water depth and fluctuations, predation, competing vegetation, carbon and iron content, and others. In fact, wild rice has been proven to thrive in waters with sulfate concentrations far above the existing limit, even as high as 1,600 mg/L. In Hay Lake, directly downstream from Keetac, the wild rice crop is healthy.

I, along with my colleagues in the mining industry, value environmental stewardship and want to protect the Iron Range's beauty and natural resources. Many of us spend our free time enjoying outdoor activities like fishing, hunting, camping, golfing and canoeing. I don't want to pollute the very waters I enjoy so much with my family. Enforcing this standard would be an ineffective means of protecting those waters. Not only is the science outdated, it is also financially unattainable for many businesses and communities, and puts Minnesotans at risk without any guaranteed environmental benefit.

I urge the MPCA to refrain from including sulfate limits in Keetac's permits until a modern, science-based standard is adopted – one that reflects what we know today, not what we thought we knew in 1973.

The economic implications of enforcing the current standard simply cannot be ignored. Mining is a cornerstone of Northeast Minnesota's economy, contributing over \$1.8 billion annually and supporting more than 4,000 family-sustaining jobs. These positions offer wages significantly above the regional average, with mining workers earning approximately \$1,708 per week, nearly \$950 more than the average across all industries. To jeopardize this economic powerhouse with an arbitrary and unworkable standard is to put the prosperity of the Iron Range – and thousands of Minnesotans – at risk.

I applaud the MPCA's commitment to protecting our environment and preserving the Iron Range.

But Minnesotans deserve environmental standards that are grounded in science, effective in practice and fair to the communities they impact. The current sulfate rule fails on all these counts. Thank you for your consideration.

Mike Bakk
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