

Mary Davidson

Dear Department of Natural Resources,

Minnesotans must protect water for future generations. The current EIS scope for Tamarack Mine does not address all potential impacts on surface water, groundwater, and wetlands in the mine area and downstream.

The EIS scope must ensure future mining permits do not harm essential environmental resources. The DNR should fully evaluate long-term impacts to Minnesota's water. Please consider these concerns and recommendations:

(1) Mine Dewatering, Groundwater Drawdown, and Wetland Hydrology: Dewatering may remove 2.3 million gallons of groundwater daily, altering wetland hydrology, impacting wells, aquifers, and wetlands that buffer mercury and filter water.

1.1 The EIS should use a DNR-approved groundwater model to show drawdown during all phases, including effects on peatland and wild rice waters, even in winter.

1.2 The EIS should also evaluate enhanced, worst-case dewatering scenarios, not just the initial assumptions.

(2) Postclosure Groundwater Contamination: After closure, mine water chemistry (acid mine drainage, metals, sulfate, chloride) poses long-term risks to groundwater and connected surface waters.

2.1 The EIS must include geochemical modeling for all closure stages under aerobic and anaerobic conditions. Financial assurance must cover long-term water treatment (at least 500 years) if needed.

(3) Peatland Disturbance and Mercury Mobilization: Peatlands in the area have accumulated legacy mercury. Excavation, drainage, and oxidation during construction will mobilize mercury and generate sulfate, stimulating methylmercury downstream.

3.1 The EIS must quantify peat volume disturbed, mercury released, and address restoration and carbon sequestration. Require a mass balance analysis of mercury through disturbance, transport, and methylation.

(4) Cumulative Impacts to Downstream Waters: The Tamarack River, Prairie River, Big Sandy Lake, and Mississippi River already have pollutant loads and impairments, affecting wild rice and tribal fishing. Require quantitative cumulative impact analysis for all project discharges and existing watershed impairments.

4.1 The EIS should require quantitative analysis of cumulative impacts from all discharge sources combined with existing watershed impairments.

(5) Contact Water Treatment Plant (CWTP) Effluent: Increased high-intensity precipitation

could cause treatment plant bypass, overtopping, or overwhelmed stormwater systems, releasing untreated water to receiving systems.

5.1: The EIS must model water quality impacts under extreme storm scenarios to ensure CWTP and stormwater systems maintain compliance beyond design norms.

(6) Mine Stormwater Runoff: Industrial stormwater can carry elevated sulfate, metals, and particulates. The Scoping EAW proposes discharge to nearby wetlands or ditches without clear effluent limits for contact stormwater.

6.1: The EIS should distinguish contact from non-contact stormwater, set effluent standards for contact stormwater, and require routing to the CWTP rather than direct discharge.

(7) Sulfate Loading to Wild Rice Waters: Mine dewatering and effluent from the CWTP and industrial stormwater will add sulfates to County Ditch 13, the Tamarack River, Prairie River, Big Sandy Lake, and the Mississippi River, impacting water quality and aquatic life, including wild rice.

7.1: The EIS should analyze sulfate loading from all discharge pathways against MPCA's wild rice sulfate standard (10 mg/L) using quantitative modeling for average and extreme scenarios.

7.2: The EIS should include a baseline survey of wild rice density, distribution, and condition downstream to enable detection of project impacts.

7.3: The EIS must quantify: (a) sulfate loading from all sources; (b) methylmercury production potential in receiving wetlands; and (c) bioaccumulation pathways to fish consumed by tribal and non-tribal harvesters.

Thank you,

Mary Davidson

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