FRIENDS OF THE MISSISSIPPI RIVER

Protecting, restoring and enhancing the metro Mississippi River and its watershed since 1993.

106 W. Water St., Ste. 600 | St. Paul MN 55107-2032
(651) 222-2193 | fmr.org | info@fmr.org

September 14th, 2026

Tamarack EAW Project Manager
Environmental Review Unit
Ecological and Water Resources Division, DNR
500 Lafayette Rd. Saint Paul, Minnesota, 55155-4025

On behalf of Friends of the Mississippi River (FMR), thank you for the opportunity to provide public comments on the scoping documents for a state Environmental Impact Statement for the Tamarack Mining Project.

Minnesotans believe we must protect water for current and future generations. The scope of the EIS for the Tamarack Mine, as it stands, fails to adequately account for the mine's potential impacts on surface water, groundwater, and wetlands in the mining area and downstream.

The scope of the EIS must be improved to ensure that any subsequent mining permit will not harm essential environmental resources. We urge the DNR to fully evaluate the long-term impacts to Minnesota's water resources and ensure clean water is protected for future generations.

FMR requests the DNR consider the following concerns and recommendations in evaluating the scope of the proposed Environmental Impact Statement.

1. **Mine Dewatering, Groundwater Drawdown, and Hydrology**: Mine dewatering is estimated to require the removal of 2.3 million gallons of groundwater per day or more. This level of dewatering could alter wetland hydrology, impact local residential wells and aquifer levels, and potentially impact wetlands that buffer mercury and filter water quality.

    - 1.1 Comment: The EIS should include the application of a DNR-approved groundwater model and mapping exercise that demonstrates the extent of groundwater drawdown through operations, closure, and post-closure phases,

including effects on peatland hydrology, wild rice waters, and downstream hydrology (including during winter months).

- 1.2 Comment: The EIS should also evaluate enhanced dewatering scenarios that evaluate worst-case dewatering needs rather than limiting the dewatering evaluation to the proposer's initial dewatering assumptions.

- 1.3 Comment: To incorporate the risks posed by changing precipitation and climate patterns throughout the state, including the proposed project area, the EIS should go beyond historical analysis of flooding and flood risks within the watershed to determine how the topography of the site might impact the mine during flood events. The EIS should evaluate the flooding and flood risk potential associated with a range of potential future climate and precipitation regimes.

2. **Post-Closure Groundwater Contamination**: Upon mine closure, the chemistry of this mine water (including potential acid mine drainage, metal residues, sulfate, and chloride) poses long-term risks to groundwater and hydrologically connected surface waters.

    - 2.1 Comment: The EIS must include geochemical modeling of mine water quality through the full flooding, recovery, and post-closure steady-state period under both aerobic and anaerobic scenarios.

    - 2.2 Comment: Financial assurance must be adequate to fund long-term post-closure monitoring and mitigation for no less than 500 years.

3. **Peatland Disturbance and Mercury Mobilization**: The project area contains significant peatland complexes that have accumulated legacy mercury over decades. Excavation, drainage, and oxidation of peat during construction will physically mobilize stored mercury and, through oxidation, generate additional sulfate that further stimulates methylmercury production in downstream systems.

    - 3.1 Comment: The EIS must quantify total peat volume disturbed, associated mercury mass released, and how reclamation plans will address peatland restoration (including carbon sequestration). A mass balance analysis of mercury through peat disturbance, transport, and wetland methylation should be required.

4. **Cumulative Impacts to Downstream Waters**: Given that the Tamarack River, Prairie River, and Big Sandy Lake and the Mississippi River already carry existing pollutant loads and impairments, and given downstream wild rice and tribal fishing interests, the state should require a quantitative cumulative impact analysis that accounts for all project discharge sources in combination with existing watershed impairments.

    - 4.1 Comment: The EIS should require a quantitative cumulative impact analysis that accounts for all project discharge sources in combination with existing watershed impairments, including the Upper Mississippi River and St. Croix River watersheds.

5. **Contact Water Treatment Plant (CWTP) Effluent**: Minnesota is experiencing an increased frequency of high-intensity precipitation events. Treatment plant bypass, overtopping of retention ponds, or overwhelmed stormwater infrastructure during extreme precipitation events could release untreated contact water to receiving systems.

    - 5.1 Comment: The EIS must model project water quality impacts under extreme precipitation scenarios — including a 100-year, 24-hour storm — to determine whether the CWTP and stormwater management systems can maintain effluent quality compliance under conditions beyond design norms.

6. **Mine stormwater runoff:** Industrial stormwater at a nickel mine site can carry elevated sulfate, metals, and fine particulates. The Scoping EAW proposes to discharge industrial stormwater to "nearby unnamed wetlands and/or ditches" absent clear water quality effluent limits for contact stormwater.

    - 6.1 Comment: The EIS should distinguish between contact and non-contact stormwater, establish effluent quality standards for contact stormwater, and require routing of contact stormwater to the CWTP rather than direct discharge to nearby surface waters.

7. **Sulfate Loading to Wild Rice Waters**: Mine dewatering and effluent discharge from the Contact Water Treatment Plant (CWTP) and industrial stormwater runoff will contribute sulfates into County Ditch 13, the Tamarack River, the Prairie River, Big Sandy Lake, and the Mississippi River. This could impact downstream water quality and aquatic life, including native fish and wild rice waters.

- 7.1 Comment: The EIS should analyze sulfate loading from all project discharge pathways against MPCA's wild rice sulfate standard (10 mg/L) via a quantitative sulfate transport modeling through the full receiving water system under both average and climate-extreme discharge scenarios.

- 7.2 Comment: The EIS should include a baseline survey of wild rice density, distribution, and condition across the downstream hydrological system; without which it will be difficult to detect or attribute project-caused impacts after operations begin.

- 7.3 Comment: The EIS must quantify (a) sulfate loading from all project sources including stormwater; (b) methylmercury production potential in receiving wetlands; and (c) bioaccumulation pathways through aquatic food webs to fish species consumed by tribal and non-tribal subsistence harvesters.

- 7.4 Comment: The EIS must quantify the probability of an accidental release of representative hazardous materials during transportation to and from the Project site, as well as the potential impacts to receiving waters.

8. **Greenhouse Gas Emissions**: The proposed mine will contribute to the state's already-excessive greenhouse gas (GHG) emissions, including but not limited to stationary and mobile combustion sources, industrial processing, land clearing and land use change, disturbed peat and soils, and indirect emissions associated with facility operations.

    - 8.1 Comment: The EIS should include an evaluation of GHG emissions associated with damaged or altered wetlands.

    - 8.2 Comment: The EIS should include an evaluation of GHG emissions associated with all project-related transport, including construction, operations, and relocation of material for processing.

    - 8.3 Comment: The EIS should include an evaluation of GHG emissions associated with lost GHG sequestration capacity resulting from facility construction and operations.

9. **Visual Impacts Analysis**: The proposed EIS includes viewshed analysis and modeling to assess visual impacts and identify mitigation methods, including a screening buffer.

- 9.1 Comment: The screening buffer modeling should include both leaf-on and leaf-out conditions.

- 9.2 Comment: The EIS should include analysis of planted tree sizes, expected tree size over the first ten years of growth, and a tree care plan. The associated visual analysis should model the impact of the screening buffer at 1-, 3-, 5-, and 10-year horizons.

- 9.3 Comment: The proposed analysis includes an evaluation of how a screening barrier "*...would create habitat for wildlife and improve ecological diversity.*" However, there is no foreseeable scenario where this project produces a net wildlife habitat and ecological diversity benefit. Any evaluation of the ecological benefits of a screening barrier should be placed in the context of the larger project.

- 9.4 Comment: The EIS should evaluate the potential for turning off all facility lighting during primary migration periods.

FMR feels that the above recommendations will strengthen the proposed Environmental Impact Statement and better inform the public about the potential impacts of this project on Minnesota's unique environmental resources.

Thank you for your consideration,

Trevor Russell

Water Program Director
Friends of the Mississippi River