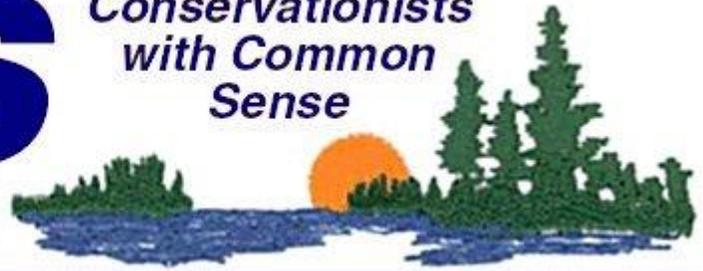


# CWCS

*Preserving access to and multiple-use of  
public lands & waters*

Conservationists  
with Common  
Sense



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Stuart Arkley, EIS Project Manager  
Minnesota Department of Natural Resources  
Division of Ecological Resources  
Environmental Review Unit  
500 Lafayette Road, Box 25  
St. Paul, MN 55155-4025

November 16, 2009

Dear Mr. Arkley,

Conservationists with Common Sense (CWCS), an organization with over 4,000 members all across the United States, works to preserve recreational access to and multiple uses of public lands and waters. We submit the following comments on the PolyMet draft EIS.

In regards to economic development, CWCS supports the use of common sense, the best available scientific data, objective analysis, and broad public input on the part of government agencies and elected officials when making and implementing land management and environmental policies. We believe a healthy natural environment, including clean air, water and soil is essential to present and future generations. But, along with being environmentally, economically and socially responsible, the human factor must be put back into land management policies. The needs of local communities and all users can and must be balanced with the conservation of sensitive natural environments. Common sense is needed in addressing economic development for the betterment of all.

In this present depressed economy, jobs are very much needed all across the country and especially in northern Minnesota. The proposed NorthMet project at the former LTV Plant in Hoyt Lakes, a non-ferrous mining project of PolyMet Mining, would create 400-450 new, high-quality permanent jobs with additional spin-off jobs.

PolyMet's patented hydrometallurgical processing technology - PLATSOL - makes recovery of both base and precious metals possible with high levels of recovery. This is a clean technology with no smelting involved and is the only process that can recover the platinum, palladium, gold and silver without using cyanide. This process is new to Minnesota but is used in Ontario, Laos, New Zealand, and even in southwestern U.S.

With forever increasing use of computers, cell phones, iPods, medical equipment, appliances, catalytic converters in cars, and numerous other products, the need for these precious metals is in great demand. It would be far better to mine these metals here in Minnesota where we have strict environmental protection laws and regulations rather than continuing to get these metals from the polluting mines of China and Russia where they have no environmental protection laws. It is the acid rain from these overseas mines that is polluting our north country!

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The Friends of the Boundary Waters, Northeastern Minnesotans for Wilderness, the Sierra Club, and Ely business Piragis Northwoods Company have supported the production of a propaganda film opposing the PolyMet project. Even though PolyMet's process uses clean, energy efficient technology for low grade sulfide ore, the film shows polluted areas from other mining sites of a higher grade sulfur ore. The film states concern for the precious waters of the Boundary Waters, but the PolyMet project is not within the Boundary Waters watershed.

Much of the propaganda film is aimed not at PolyMet, but at other proposed mining projects. All of these projects are outside of the Boundary Waters and there is no buffer zone to the Boundary Waters. And, if there were any impacts to the Boundary Waters you can bet that CWCS and the people living and making a living near the Boundary Waters would be the first to get after the mining companies. PolyMet has set aside \$600 million to correct any possible problems and to address reclamation of the area at the mine's closure. This amount is to be adjusted yearly.

It's interesting to note, that in the 1978 BWCA Wilderness Act if the President declares a national emergency mining could take place within the Boundary Waters, but no one wants to do this.

Energy usage required for the hydrometallurgical process would be about half compared to a traditional smelter. The opportunity to "recycle" the former LTV site (an already big hole in the ground) also makes the project more viable in the current global marketplace for base and precious metals. The concern about the huge footprint of mining is unjustified as other developments have huge footprints as well. Look at the hundreds of acres of land needed for solar panels, wind farms and corn fields for ethanol.

The Duluth Complex, which includes the area of the PolyMet mine, has one of the world's largest mineral deposits. They include the second largest deposit of copper in the world, the third largest deposit of nickel in the world and the second largest deposit of PGM. Such an operation, as well as the other proposed mining projects, would be beneficial to our nation's economy and revitalize our dying communities with good paying jobs well into the next century.

Common sense dictates that these minerals should be mined here in Minnesota where we care for the environment with strict environmental and pollution regulations.

Thank you for the opportunity to submit comments on the PolyMet draft EIS.

Sincerely,

Nancy McReady  
CWCS President