

To: MN Department of Natural Resources

ATTN: PolyMet NorthMet Project

From: Minnesota Coalition of Lake Associations (MN COLA)

Regarding: The Dam Safety Permits for the PolyMet mining operation

Dear Commissioner Landwehr,

The Board of Directors of the Minnesota Coalition of Lake Associations has authorized this letter of extreme caution regarding the proposal to permit the two dams under consideration for the PolyMet mine, one of which would hold the dangerous sulfide tailing under water, and another the hydrometallurgical residue nearby.

Neither of these dams create holding basins that can be cleaned up within a reasonable time period after the mining process, but instead would remain a permanent threat near the top of the watershed, requiring continued expensive maintenance in perpetuity. Given the potential for shifting economic and political conditions over the centuries, or simply catastrophic errors made during maintenance, we have scant confidence that this maintenance will, or even can be continued sufficient to the enormous task and risk. With these dams located at the top of the watershed, and depending upon a 40-year-old taconite tailings dam instead of state-of-the-art technology in their construction, the State of Minnesota is essentially creating an extremely high potential for a Superfund Site for its future generations to deal with.

We believe that the approval of these permits would violate the Public Trust Doctrine as expressed in both the Minnesota Environmental Policy Act (MEPA), and Minnesota Environmental Rights Act (MERA). These permits should be denied pending further study and revision.

Thomas Nelson, President of the Minnesota Coalition of Lake Associations

Attest:

Joseph Shneider, Secretary of the Minnesota Coalition of Lake Associations

Date: October 16, 2017