October 20, 2015

Governor Mark Dayton
116 Veterans Service Building
20 W 12th Street
St. Paul, MN 55155

Dear Governor Dayton;

Subject: PolyMet project –NorthMet-Comments by the Minnesota Division of the Izaak Walton League of America (IWLA)

As the SDEIS process draws to a close we respectfully submit for your consideration these comments on behalf of MN IWLA.

Our members have been actively working to understand and assess the project for several years. Our activities have included attending public meetings on the SDEIS. We’ve also sponsored meetings for our members and the general public. Our meetings have been of three types, (1. PolyMet presenters, 2. Environmental presenters, and 3. Forum for the general public). DNR Staff assisted at a public forum in Duluth. Our Duluth Chapter alone had well over 500 people attend their series of meetings.

Our goals included education. That required that IWLA give the project proponents a generous and fair hearing, the same for opponents. And perhaps most importantly, MN IWLA truly attempted to provide a “safe-place” for citizens who were seeking factual information before forming their opinion. For example, in Duluth, at a meeting attended by 275 people, the Duluth Chapter did not allow buttons (pro or con, or petitions pro or con). PolyMet, Minnesota Center for Environmental Advocacy and DNR Minerals were featured. All questions were written by the audience.

Our members realize that mining is necessary to civilization. Our members also understand that clean water is essential to life. And they realize that this is a complex and difficult issue.

In addition to the actions described above, our members met over several months and reviewed the SDEIS. We solicited from our membership, individuals who have backgrounds in forestry, wildlife management, geology (the geology associated with this project), public policy, fisheries hydrology, etc. We submitted 58 pages of comments on our findings on the SDEIS. Our conclusion was and is, to oppose NorthMet.

The rationale for Izaak Walton League opposition to the project over two years ago was primarily centered on:

1. Location—The site and region abound in very high quality resources (the broad spectrum that NE MN depends on for its economy and for many, their life-style). IWLA believes these resources were under-valued in the SDEIS. IWLA believes that these resources can continue to provide substantial economic benefits in perpetuity if properly cared for. To risk the loss of these benefits for a relatively short period of alternate economic activity is not, in our opinion, the best decision for Minnesota. IWLA believes that the aggregate benefits presently provided and available forever outweigh the aggregate benefits of the NorthMet project.

Mission Statement of the Izaak Walton League of America

To conserve, restore, and promote the sustainable use and enjoyment of our natural resources, including soil, air, woods, waters, and wildlife.
2. Regulatory effectiveness--State and Federal agencies have generally been ineffective in preventing significant and enduring pollution from this industry. Promises made all over the globe have not been promises kept. Politicians increasingly oppose the very regulations that are essential if there is to be any chance that promises made will be promises kept. The Minnesota Legislature exhibits this unfortunate national trend. The 2015 legislative session in Minnesota served as a vivid reminder of actions that simply do not square with the claims that many politicians make that we have the best regulations in the nation. IWLA strongly doubts the truth of the often repeated claim that MN has adequate regulations, and that we have the will to enforce those regulations and “get it right”. Our opposition to NorthMet has only been heightened by these campaigns to interfere with efforts to have an effective, efficient, and fair regulatory framework in Minnesota.

3. Financial assurances—Izaak Walton League in its comments on the SDEIS noted that the SDEIS did not adequately address the extremely important issue of financial guarantees. When IWLA raised that issue, the DNR response was and is that financial guarantees are an issue for negotiation in the permitting process, not the EIS. IWLA disagrees with that conclusion.

It is IWLA’s belief that once an EIS has been approved, the DNR with its mission to encourage mineral development will no longer exercise aggressive efforts to protect Minnesota taxpayers. DNR will then advocate on behalf of mineral development. There is considerable consensus that the NorthMet project will need to mitigate and monitor pollution beyond a duration that government has ever experienced. Our institutions are not well equipped to do this as is presently evidenced by the struggle to adequately regulate the taconite industry in Minnesota. The evidence strongly points to the fact that precious metals mining will be a much greater challenge than the iron ore industry.

The industry will argue that there is a moral imperative to use Minnesota natural resources. That to not do so will harm civilization, the industry, and cause mines of this type to be done in areas of the world that do not have adequate environmental protections. This is an interesting and contradictory argument in our opinion. Much of the mining around the globe is done by the same companies. If there is a moral imperative in this matter, at least part of it belongs to the mining industry to meet high and adequate global standards, not just where a state or nation attempts to require adequate levels of protection.

As stated above, IWLA believes that the aggregate economic benefits proposed in the NorthMet project are less valuable than the current benefits provided in perpetuity from this site. Given the history of legacy pollution from these projects, this is a project that is not in Minnesota’s best interest.

Therefore---

The Minnesota Division of the Izaak Walton League of America respectfully requests your public opposition to the PolyMet proposal known as NorthMet. Further the Izaak Walton League requests that as our Governor you initiate a process to identify candidate areas where mining for precious metals should be prohibited.

Thank-you for your environmental leadership. It has been a breath of fresh air during a time of declining advocacy for a healthy environment in our state and national legislative bodies.

Sincerely;

Barry Drazkowski, President
Minnesota Division
Izaak Walton League of America

Dave Zentner, Past National President
Izaak Walton League of America

cc: Jaime Tincher
Molly Peterson