



March 10, 2014

Professional Distinction

Personal Dignity

Patient Advocacy

Ms. Lisa Fay, EIS Project Manager
Minnesota DNR Division of Ecological and Water Resources
Environmental Review Unit
500 Lafayette Road
St. Paul, MN 55155-4025

Dear Ms. Fay:

At its Board of Directors meeting on January 22, the Minnesota Nurses Association heard the pros and cons of the proposed PolyMet mine from several speakers familiar with the project. After further discussion, the Board felt it necessary to draft this letter.

The PolyMet NorthMet Supplemental Draft Environmental Impact Statement (SDEIS) contains inadequate analysis of the impacts on public health from the proposal. The co-lead agencies should conduct and include a health impact assessment (HIA) in the Environmental Impact Statement to fully analyze the public health implications of PolyMet's proposed mine.

HIAs are a tool used in the environmental review process. Environmental Impact Statements, such as the PolyMet SDEIS being considered by the co-lead agencies, are required by the National Environmental Policy Act to contain analysis of impacts on human health. However, human health is subordinated to environmental impacts, is addressed in a piecemeal fashion, and there is no examination of the social determinants of health in the SDEIS. A HIA would integrate human health into the environmental review for the PolyMet NorthMet proposal, allow consideration of mitigation measures, and involve the community in planning for the project.

The State of Alaska has adopted HIAs as a best practice for environmental review of mining and natural resource extraction proposals and has established procedures and a toolkit for conducting a HIA in that context. The U.S. Centers for Disease Control and Prevention also has a number of resources for integrating HIAs into the environmental review process. In Minnesota, HIAs have also been conducted as part of projects such as the Central Corridor Light Rail Transit in the Twin Cities.

The Minnesota Nurses Association is requesting that you please take the following action as you revise the NorthMet Supplemental Draft Environmental Impact Statement:

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St. Paul, MN 55102
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Conduct a health impact assessment for the PolyMet project and include the results of the assessment in the EIS. The HIA should include examination of all aspects of public health affected by the proposal, including analysis of the social determinants of health.

Sincerely,

A handwritten signature in cursive script that reads "Linda Hamilton".

Linda Hamilton, RN
President, Minnesota Nurses Association

Resources:

Rajiv Bhatia and Aaron Wernham (2008). "Integrating Human Health into Environmental Impact Assessment." *Environmental Health Perspectives* 116(8). 991-1000. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2516559/>.

State of Alaska Department of Health and Social Services. "Alaska Health Impact Assessment (HIA) Program." <http://www.epi.alaska.gov/hia/default.htm>.

United States Centers for Disease Control and Prevention. "Health Impact Assessment." <http://www.cdc.gov/healthyplaces/hia.htm>.

United States Environmental Protection Agency (2013). "A Review of Health Impact Assessments in the U.S.: Current State-of-Science, Best Practices, and Areas for Improvement." <http://www.epa.gov/research/healthscience/docs/review-hia.pdf>