

Talon Metals Proposed Tamarack Nickel Mine: EIS Comment Period Why and How You Can Take Action

Presented on July 22, 2026 by Paula Maccabee
WaterLegacy Executive Director & Counsel



R. Levine/Mississippi River Flowage



L. Anderson/Round Lake at Sunrise

What Does WaterLegacy Do? Advocacy, Scientific Expertise, Results. Sacrifice Zones are Not Inevitable!



PolyMet/Glencore/NewRange (2005)

- Water Permit – **REVERSED** (2023)
- Permit to Mine – **REVERSED** (2021)
- Wetlands Permit – **REVOKED** (2023)
- “Zombie” Mine – could still move forward despite all reversals.

Defended and Preserved Wild
Rice Sulfate Standard (10 ppm)
since 2010 in Court, Rulemaking,
Permits, Political Process.



Talon Metals/Rio Tinto (2026)

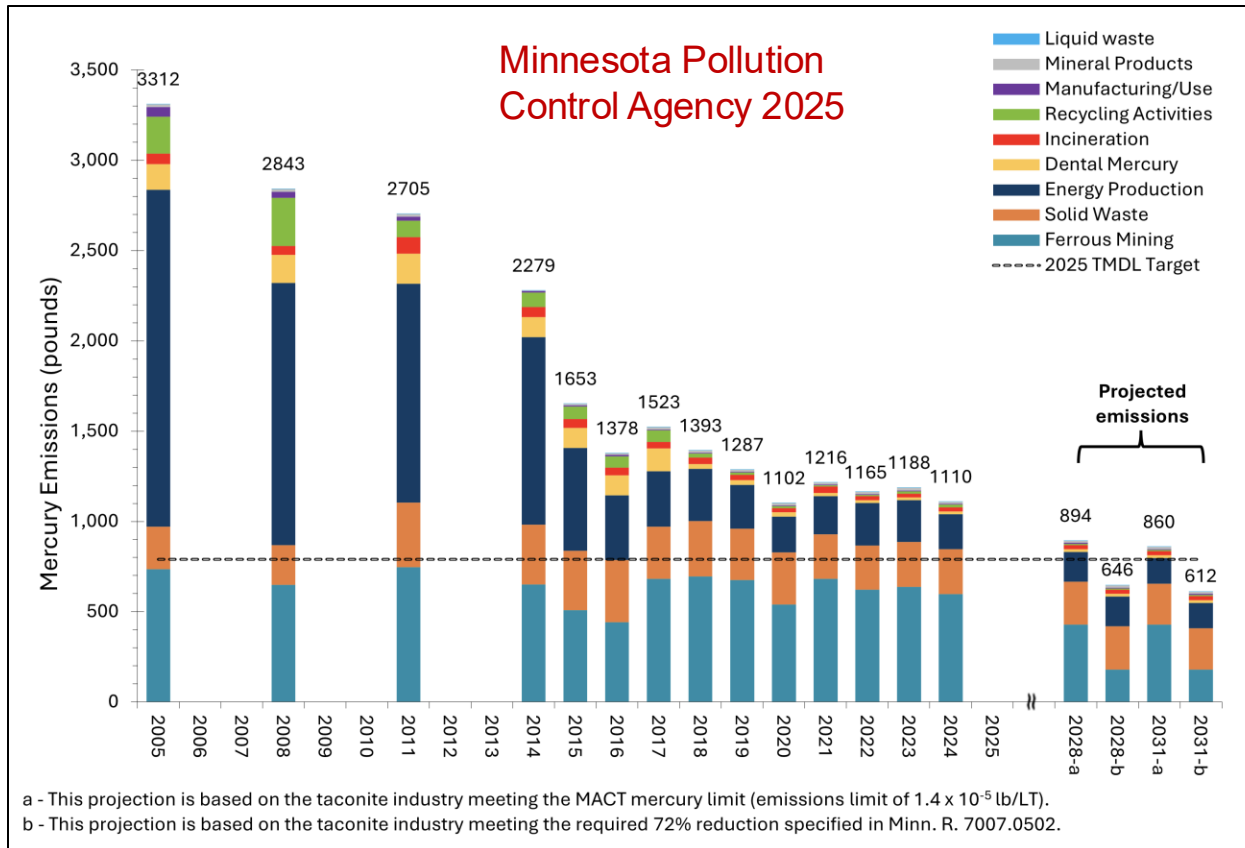
- No permit (the good news)
- Environmental review for “half a mine.”
- No feasibility NI 43-101 study.
- No federal oversight.

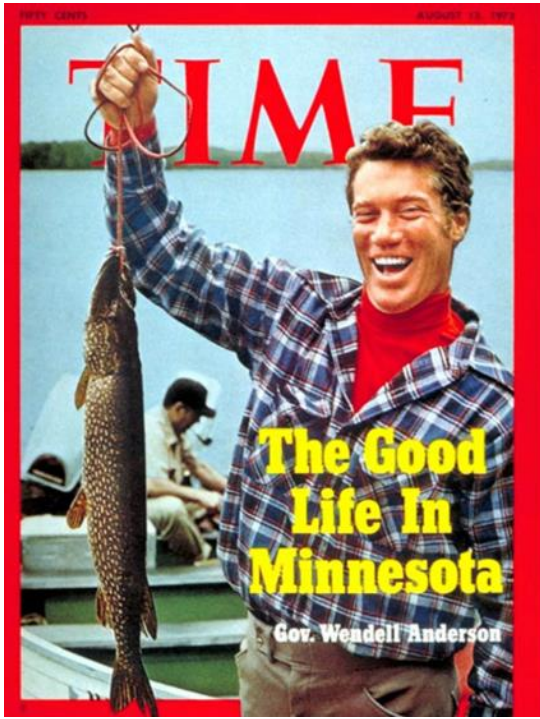
Myth and Facts about Regulation of Mining in Minnesota

Myth: Minnesota is “a good place” for metallic mining due to its “stringent regulation.”

Facts: Minnesota does not control existing taconite mine pollution. **Sulfide ore mining is more toxic due to its geology.**

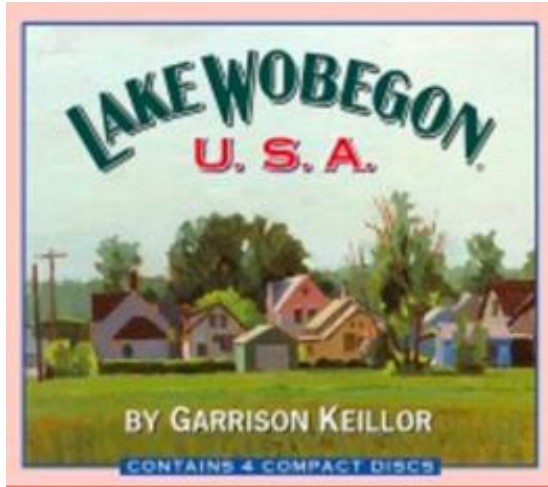
- Minnesota has 1,736 mercury impaired waters. Its taconite mines have not cut mercury emissions to comply with the State Mercury TMDL plan. They produce 75% of mercury from point sources and 54% of mercury from all sources.
- Minnesota waste rock and tailings basins leak sulfate, resulting in wild rice and mercury impaired waters.
- **No taconite permits limit mercury emissions. No taconite permits limit sulfate discharge.**





Tamarack Mine is NOT a “Good Place” to Experiment with Sulfide Ore Mining

- Minnesota sulfide ore geology creates an inherent risk of sulfate and toxic metals release. **Talon deposit, uniquely, is a “massive sulfide mineralization.”**
- Minnesota is a weak regulator, and Minnesota mines are proposed by international corporate bad actors.
- **Rio Tinto bulldozed a 45,000-year-old Indigenous sacred site at an Australian iron mine and has settled cases for bribery, political favors. Talon sumps for drilling wastes are unlined and no state agency has required testing or pollution control.**
- Talon Metals initial greenwashing; but mine is not a “climate change” project. No carbon neutrality, stated “purpose” is no longer EV vehicle metals, just extraction of ore.
- Minnesota proposed sulfide ore mines are all in wetlands, peatlands, and headwaters of major watersheds—Boundary Waters, Lake Superior, Mississippi River. **Talon is wettest site.**



There is no “Model” Sulfide Mine for Water-Rich Environments

**PROVE IT
FIRST!**



Prove It First: Mine must operate and close for 10 years without pollution in a similar water-rich environment. No mine opened in Wisconsin during years this statute was effective. (Now repealed)

Eagle Mine (underground nickel-copper mine in Michigan). Excessive arsenic and nitrate at mine site; excessive sulfate, manganese, and aquatic toxicity at processing and tailings site (Humboldt Mill). Started “8-year” mining in 2014. Began tunneling to second deposit in 2016, continuing expansion of “Eagle East” mine today.

2024: Tunnel collapse in main tunnel to Eagle East, fined \$300,000 for serious safety violations. Corroded bolts in roof stabilizing material.

Eagle Mine Update: Bought by Talon Metals in January 2026.

Every sulfide ore mine (100%) in a water-rich environment has polluted surface and/or groundwater with acid mine drainage and/or toxic metals.

Better Choices than Mining Minnesota Sulfide Ores

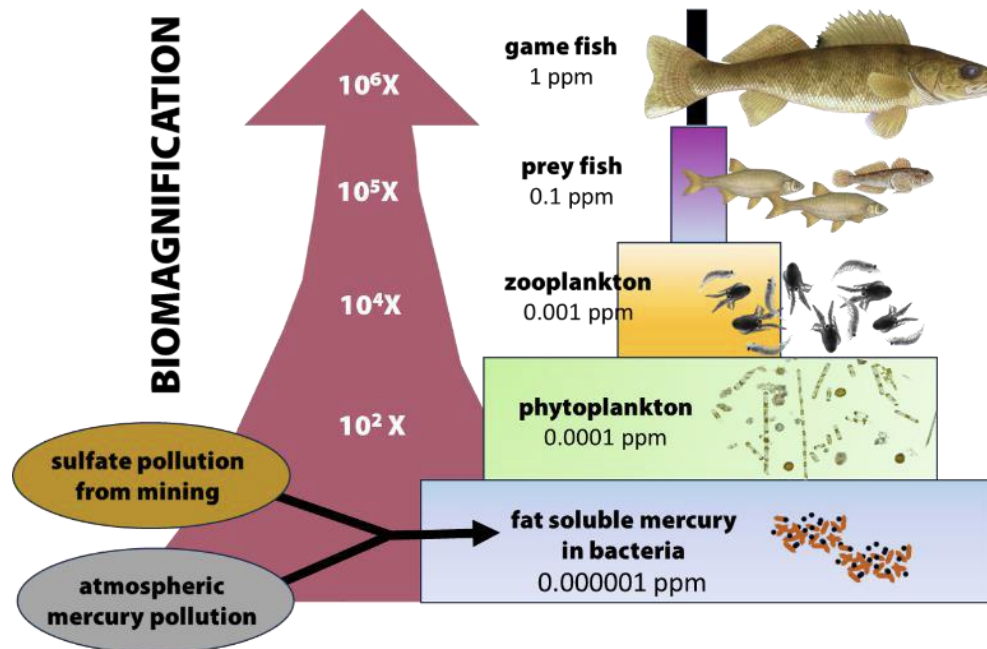


- Destroying 1,000 acres of peatlands would increase Minnesota's carbon footprint by 2%. Minnesota DNR study.
- Copper and nickel can be recycled over and over.
- Copper and nickel recycling uses **10-15% of the fossil fuel energy** used to mine and process metals.
- Minnesota recycles only **24%** of its e-waste, though this waste contains **\$3 billion per year** of valuable metals.



- Since 2020, EV batteries with less-toxic **iron and phosphate (LFP), not nickel and cobalt**, have increased from 10% to over 55% of the global market.
- Lithium, iron, phosphate (LFP) batteries cost less and are less likely to catch fire.
- **Minnesota mine permits could not require “green” EV purpose.**

Sulfide Ore Mining Threats to Water and Health



Research: High sulfate **doubles** mercury & nutrient release, increases methylmercury by **600%**. In low sulfate waters, any addition of sulfate will increase mercury methylation.

Methylmercury in fish: bioaccumulates, concentrates up to **1,000,000 times** in fish at top of food chain.

Methylmercury is neurotoxic, harming developing brains of fetuses, infants, children. **1 in 10 newborns** in Minnesota's Lake Superior Region already have unsafe mercury levels in blood.

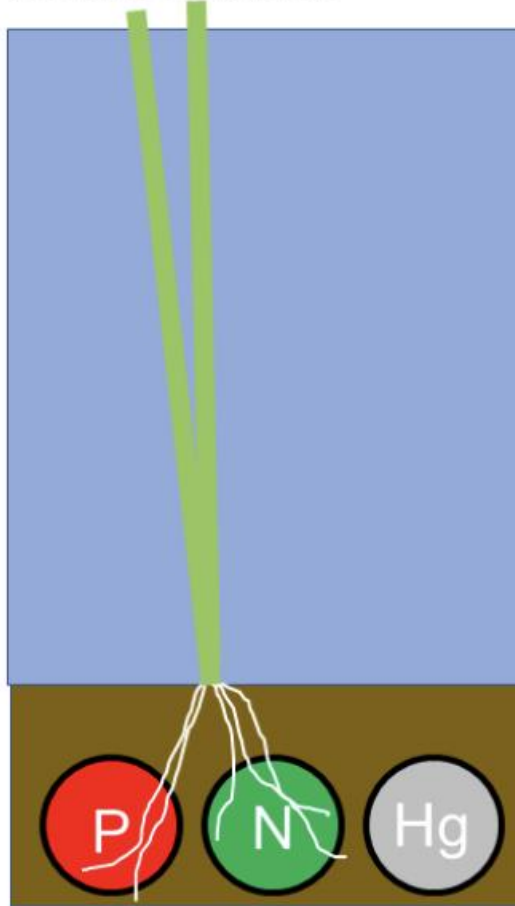
Manganese and lead in drinking water are also neurotoxins.

Arsenic in water is a carcinogen.

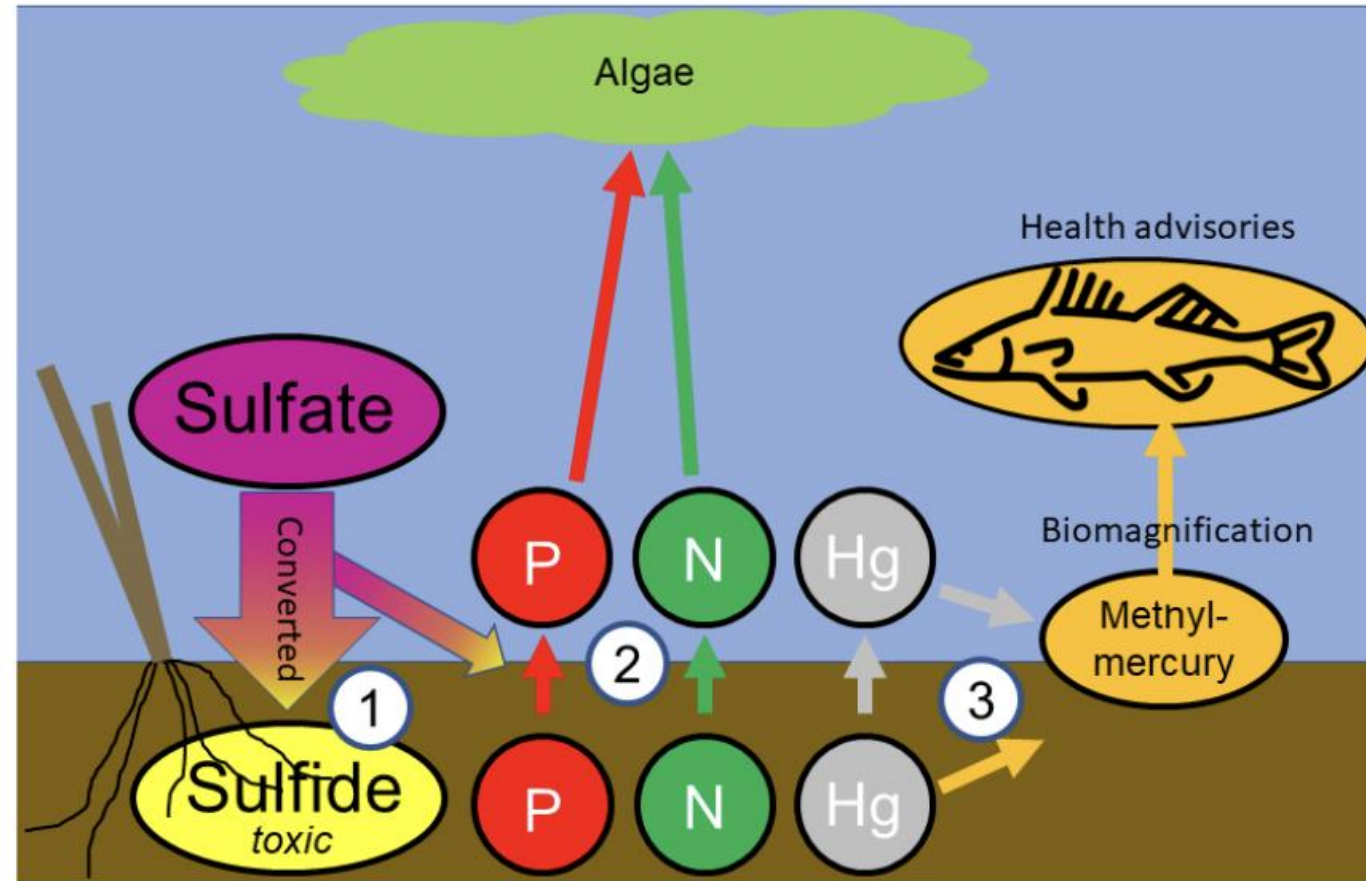
Nickel, elongate particles, diesel in air from mine dust and vehicles affect workers and residents; result in lung disease and cancer.

How Does Sulfate Pollution Affect Water Quality, Habitat, Fish?

Natural Condition



Polluted with Sulfate



Source: Amy Myrbo, 2023

Healthy Waterbody: low oxygen and low sulfide in sediments. Phosphorus (P), Nitrogen (N), Mercury (Hg), and organic matter stay in sediments.

Sulfate Polluted Waterbody: Sulfate is used by sediment bacteria to turn sulfate into toxic sulfide. In the process, organic matter decomposes, P and N are released (algae), and Hg released and methylated to MeHg (magnified in food chain).

Talon Metals/Rio Tinto Mineral Leases and Mineral Deposit Proposed Tamarack Nickel Mine

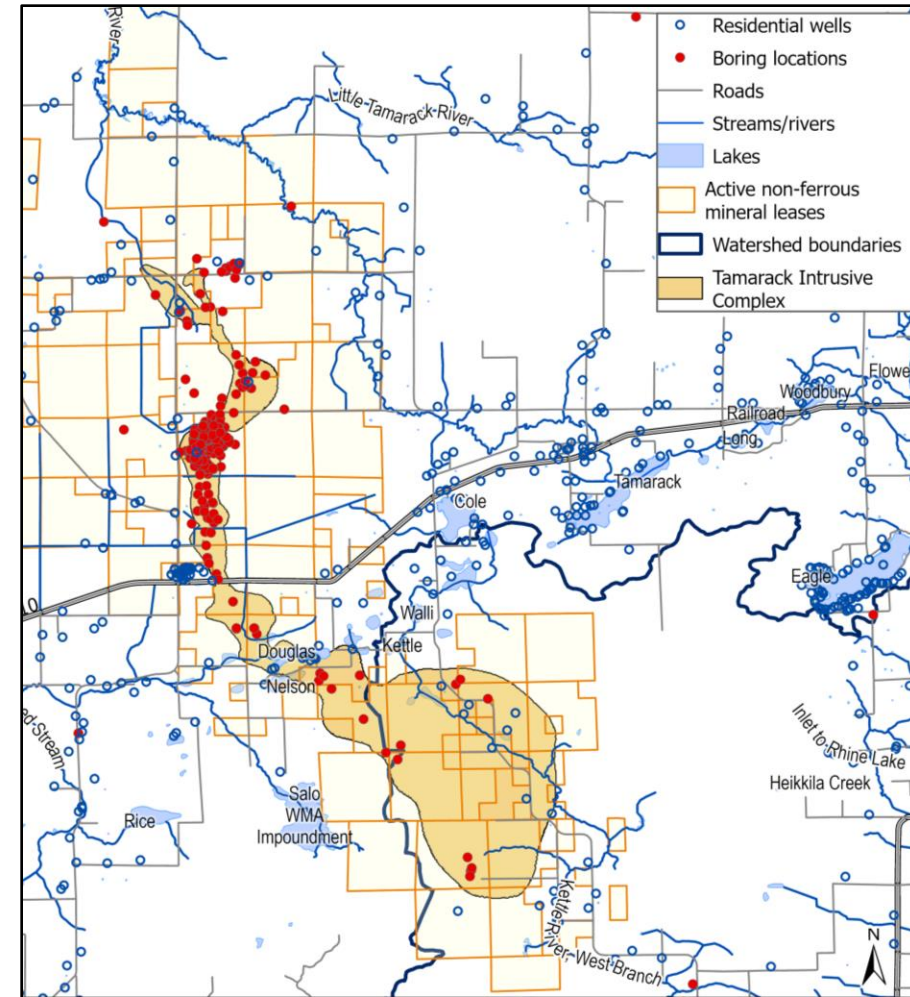
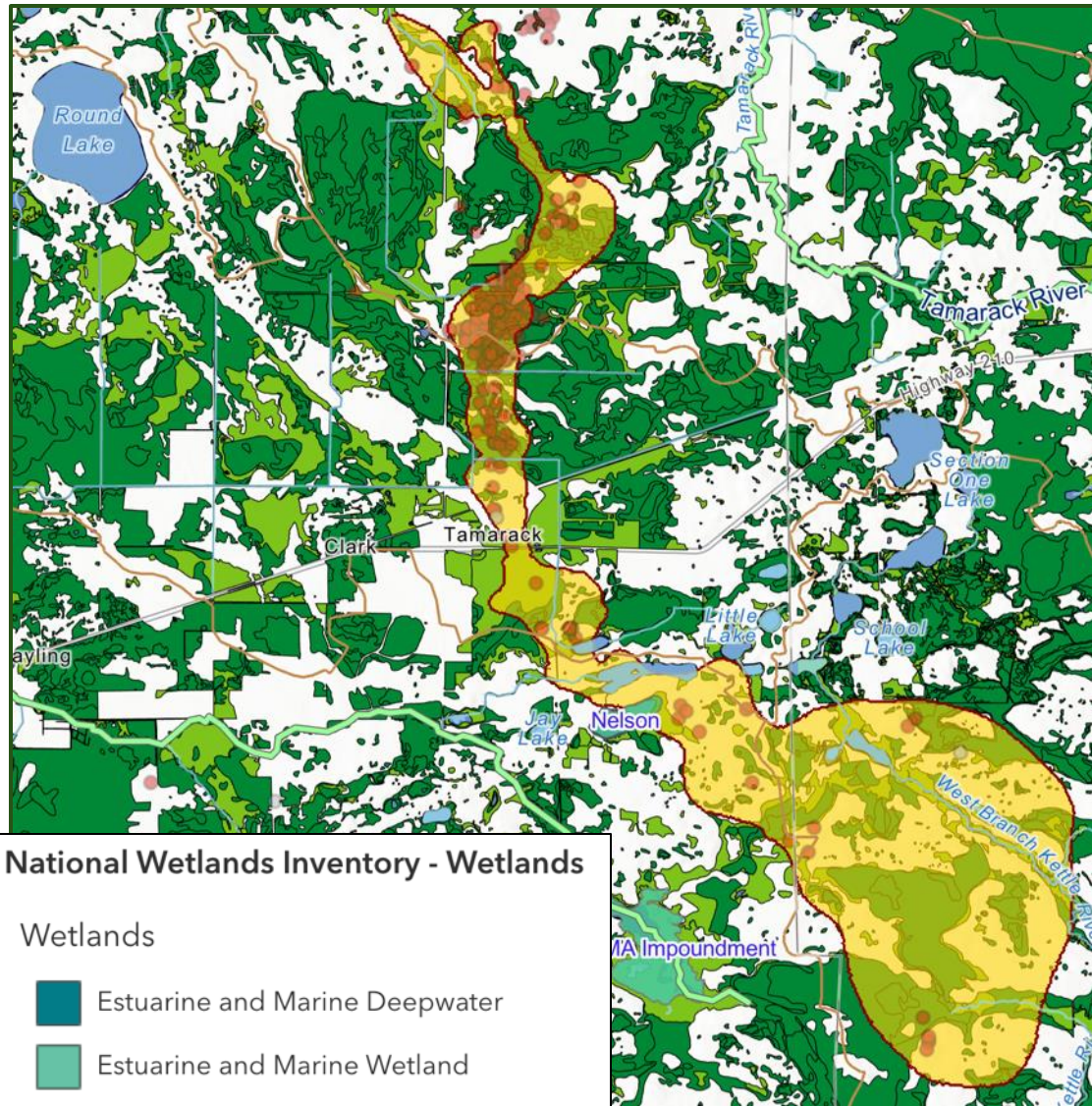
“[T]he Tamarack Intrusive Complex has district-scale potential.” Talon chief exploration and operations officer Brian Goldner (Jan. 2023)

Location of Proposed Nickel Mine:

- Proximity to Tribal lands and waters (Big Sandy, Minnewawa).
- Proximity to important and abundant wild rice waters.
- Proximity to residences, drinking water wells.
- Treaty-reserved rights under 1854 and 1855 Treaties.
- Impacts to both Mississippi River and St. Croix River watersheds.



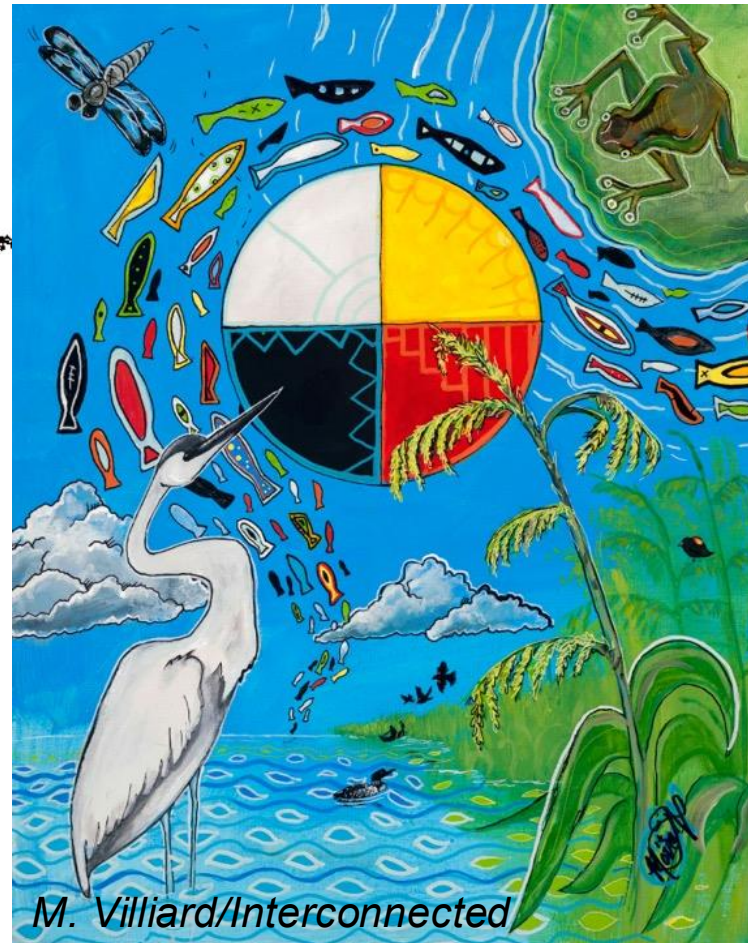
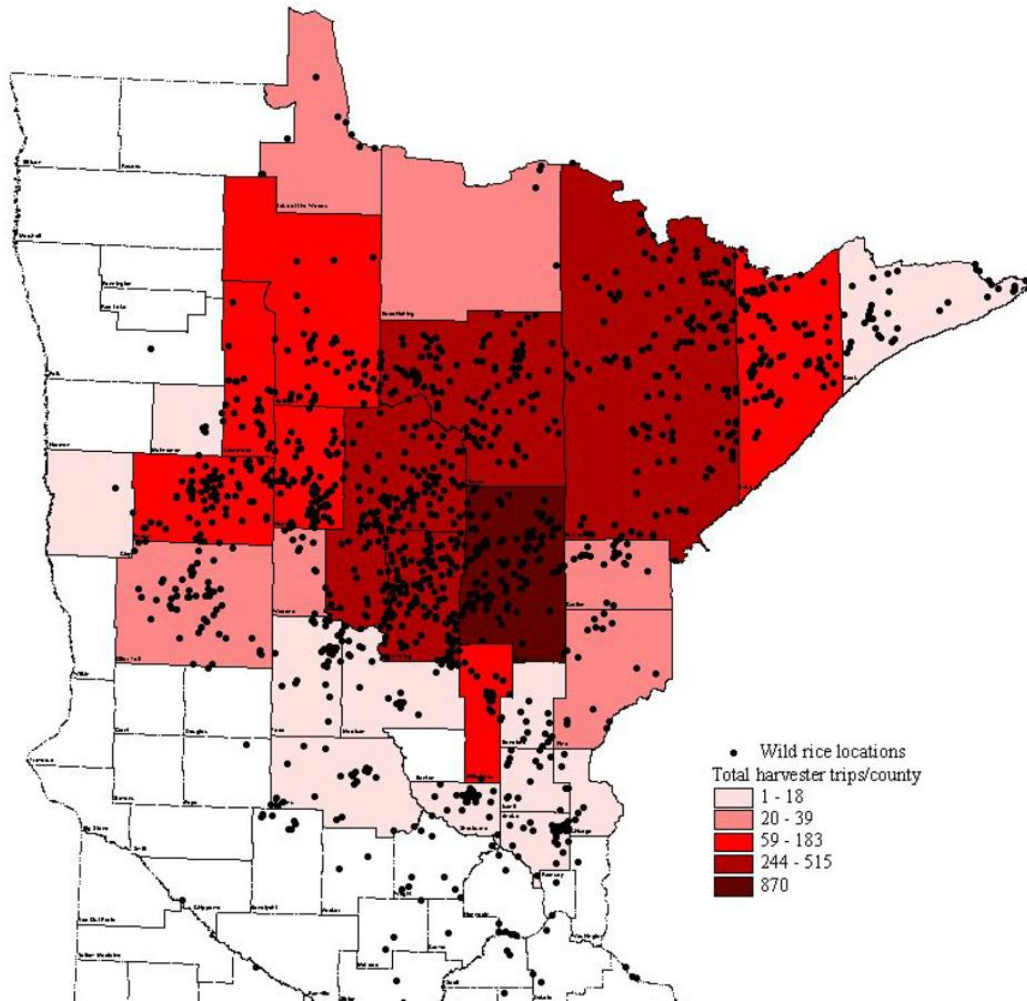
Tamarack Location: Wetlands & Drinking Water Wells



Talon: “The Project Area is primarily classified as **wetlands**.”
77% of this project area depth to water is less than 1 foot.

Exploratory borings and proposed nickel mine near **residential drinking water wells** (hollow blue circles).

Tamarack Region Wild Rice, Sulfate, Mercury, Nutrients



Vulnerable Waters

Big Sandy Lake: impaired for excessive nutrients (phosphorus, nitrogen), mercury in fish tissue.

Lake Minnewawa: Impaired for nutrients, mercury in fish tissue.

Low sulfate waters: Big Sandy @ 1.1 ppm sulfate, Minnewawa @ 1.4 ppm sulfate.

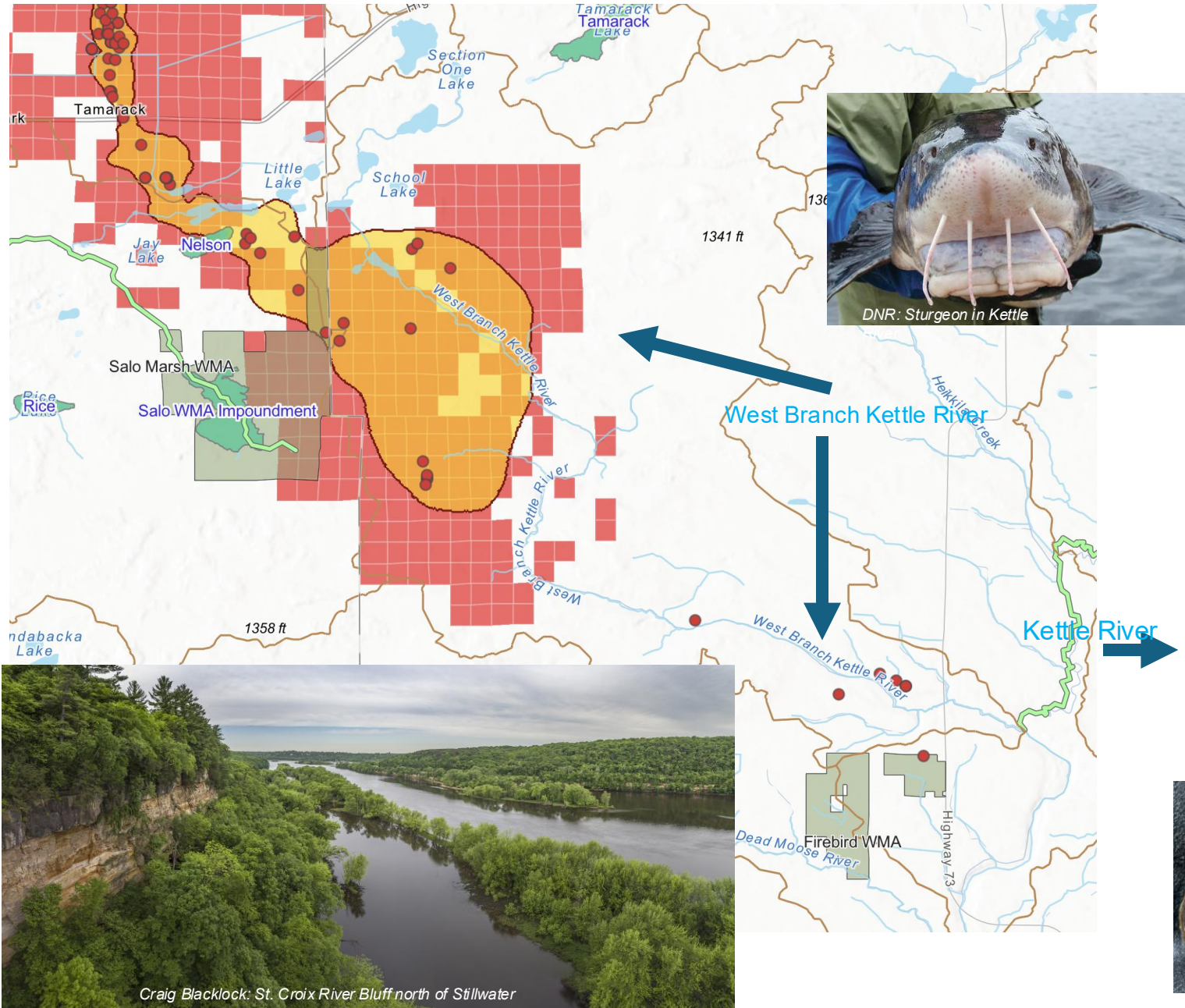
Even small increases in sulfate could increase impairments.

St. Croix River: Impaired for mercury in fish tissue.

Mississippi River: Millions of people live downstream.

- Aitkin County has more wild rice harvesting trips than any other Minnesota county.
- Treaty-reserved rights for Tribes and nutritious food for Native and non-Native harvesters.
- Food for migrating waterfowl, nurseries for young fish, mammals.

St. Croix River Watershed - Vulnerable to Sulfide Ore Mining



Mercury and Impaired Waters:

West Branch Kettle River

Mercury 3.1 ng/L in water.
Methylmercury 15%, high organic carbon, and methylating environment.

Kettle River

Impaired for mercury in fish tissue (upstream and downstream).
Impaired for fish assessment (upstream).
Impaired for E. coli (downstream).

St. Croix River

Impaired for mercury in fish tissue.
Lower stretches also impaired for PCBs and PFOS in fish.

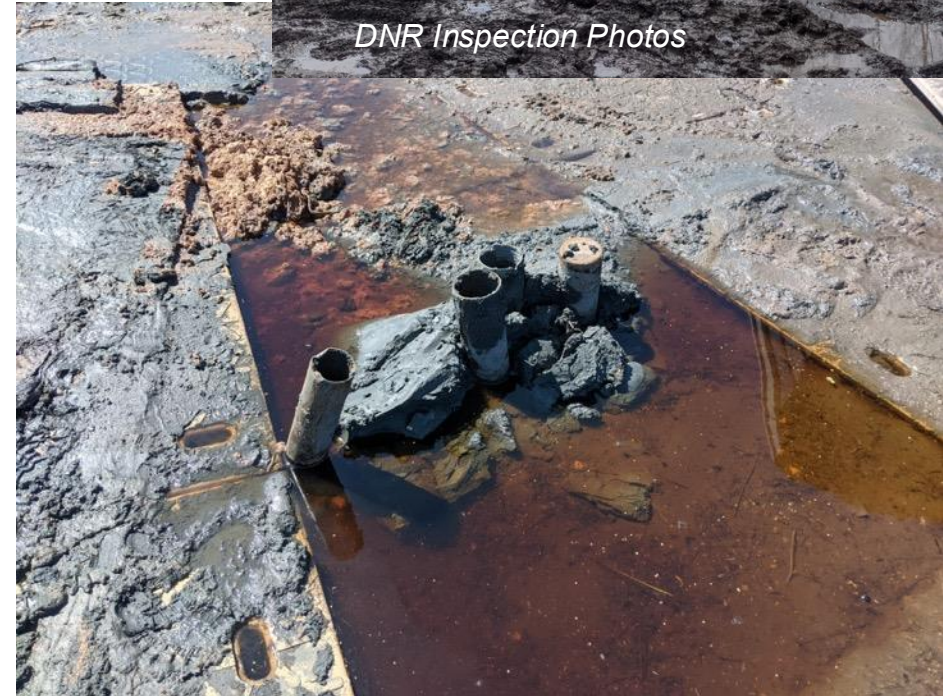
Endangered Mussels

St. Croix River

Critical habitat for endangered mussels from Taylors Falls to Mississippi River confluence is impacted by nutrient loading, contaminants. Snuffbox (left) and spectaclecase (right) mussels (NPS photos).



Talon Metals/Rio Tinto Drilling: Unlined Sumps, Rutting in Wetlands, Improperly Sealed Wells



Talon Mine EIS Environmental Review and “Scoping”

What is an “EIS”?

An EIS, short for “environmental impact statement,” is the document in which an agency is supposed to analyze the proposed project seeking permits, its potential for significant environmental effects, and alternatives to avoid, minimize, and mitigate them.

What is “scoping”?

Scoping is the decision by an agency, here the Minnesota Department of Natural Resources (DNR), on what will be studied in EIS environmental review: baseline data, details (or not) about project, analysis (rigorous or not) of potential impacts and alternatives.

Why does scoping matter?

Every subsequent decision by agencies and courts will depend on the data in the EIS. Errors and omissions could result in weak permits and hinder judicial review.



COMMENT DEADLINE:

Sept. 14 by 4:30 pm

PUBLIC MEETINGS:

McGregor High School:

Aug. 5 from 5-9 pm

Blaine Sports Center:

Aug. 12 from 5-9 pm

Effective Public Action on Talon Mine EIS Scoping

YOUR WRITTEN COMMENTS BY SEPT. 14:

Quality and quantity of your comments both matter.

Best quality comments will contain:

- Your personal statement about where you live, your interests, why you are concerned about the Talon mine.
- Statement about an issue or issues of concern.
- Request for what DNR should do or require in the EIS.
- Send comments directly to DNR comment site. You can upload a comment in Word or pdf.

Quantity also matters: Sign a form comment. You can choose more than one or send a personal comment later.

WATERLEGACY SUPPORT FOR YOU:

- Link to DNR comment page, with step-by-step instructions on using DNR's form.
- Talking points you can use in drafting your comments. Online now: mercury, wild rice, incomplete plan.
- Comment letters on issues that you can sign and we will send to DNR.

YOUR PRESENCE, COMMENTS AT MEETINGS

AUG. 5 (McGregor 5-9 pm) & AUG. 12 (Blaine 5-9 pm):

You can attend either or both DNR Public Meetings. Your presence is vital to uplift other commenters.

- Come to meeting early and sign up with DNR.
- Names for comments will be drawn by DNR at random.
- If your name is called, you can share your turn.
- Commenters will have 3 minutes.
- Please write and read your comments.

WATERLEGACY SUPPORT FOR YOU:

- Sign up sheet has meeting address, directions.
- We will follow up with facts and individual support for your personal comments.
- Connection with allies if you want to comment or if you want share your turn if called on.
- Help with getting to hearings.
- Fellowship, expertise, and enthusiasm.

Talon Mine Concern: Mercury and Methylmercury

"Perfect storm" to increase mercury contamination of fish. Talon Mine would. . .

- Excavate and dewater peatlands and wetlands (releasing mercury).
- Discharge sulfate and mercury to water.
- Emit dust containing sulfide (which reacts with water to form sulfate).
- Burn diesel and propane containing mercury.
- Mercury impaired waters: Big Sandy, Round Lake, Minnewawa, St. Croix River.
- Tribal members, cabin owners, and other rural and urban residents rely on fish that is safe to eat for nutrition, culture, exercise of Treaty-reserved rights.



EIS environmental review must provide:

- Baseline information on mercury, sulfate, sulfide in wetlands, sediments, lakes and streams near and downstream of the proposed Talon Mine.
- Data on how wetlands hydrology would be changed by the Talon Mine, including dewatering and mine drawdown for construction and operations.
- Information on all releases to air or water of mercury, sulfide, and sulfate likely from the Talon Mine and how these releases would interact.
- Analysis of how dewatering and rewetting of wetlands would be affected by drought, floods, and extreme rains related to climate change.

Talon Mine Concern: Pollution, Mine Drawdown, Wild Rice

Talon Mine threatens abundant wild rice, critical to Tribes and Non-Native Minnesotans:

- Tribal and Non-Native harvesters come to these rice beds from across Minnesota.
- Talon mine pollution and mine dewatering would degrade and contaminate wild rice.
- Talon mine is a “massive sulfide mineralization.” Contact water will contain high levels of sulfate and toxic metals. Mine chemicals—like arsenic—can make wild rice unsafe.
- Mine drawdown from dewatering would alter hydrology that sustains wild rice. Talon’s main mine tunnel would be built in a peat bog, requiring dewatering.
- Talon estimates (modeling not shown) dewatering during operations would be about 3.5 million gallons per week, or more than 1.8 billion gallons during 10 years of mining.



EIS environmental review must provide:

- Baseline conditions for wild rice, including abundance, sulfate in the water, and sulfide in sediments.
- Data on all water contacting any part of the Talon mine surface or underground: how much, how stored, how treated (if at all), where released, levels of sulfate and other chemicals both before and after treatment.
- How would both treated and untreated Talon mine-related waters compare to all state and federal water quality and health standards and existing conditions?
- DNR should require that the EIS evaluate alternatives that would reduce dewatering and drawdown from the Talon mine.

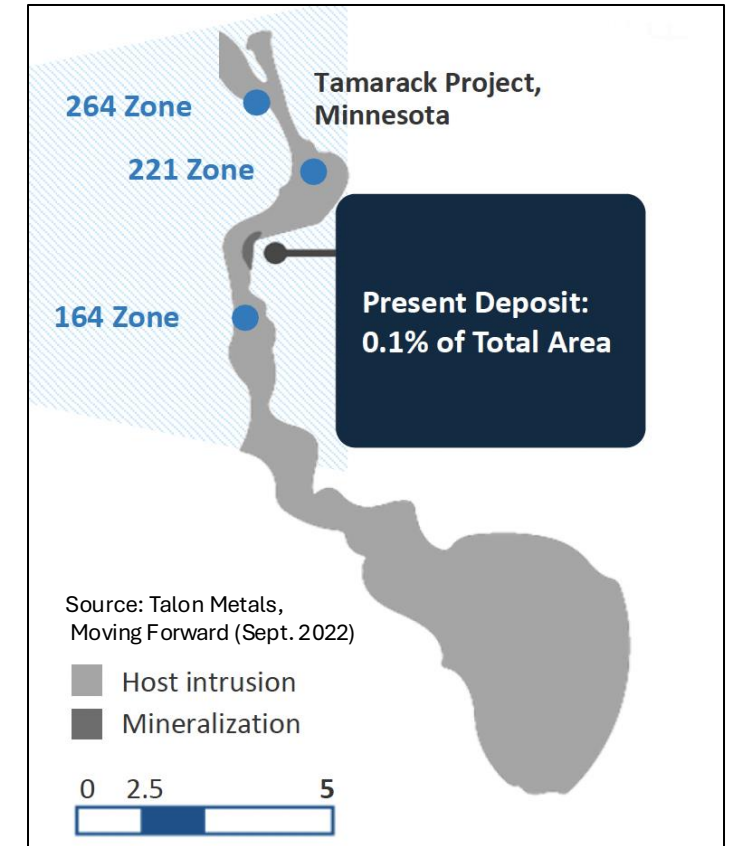
Talon Mine Concern: Incomplete and Unsupported Plan

- Talon controls 31,000 acres of mineral leases, but its proposal for EIS review includes less than one-tenth of 1% of the lease area it controls.
- The Talon EIS proposal claims that ore and waste rock will be sent to North Dakota and Michigan for processing and tailings storage. Neither plan will be studied.
- Talon's announced this June: **"The Tamarack Nickel Project does not contain reserves, and no production decision has been made. This conceptual design is preliminary in nature and is not supported by a prefeasibility study, a feasibility study or any other form of engineering study or report . . . It is uncertain if the project will be built."**
- **Minnesota's DNR has taken Talon's "proposal" at face value to limit EIS environmental review.** DNR has allowed many mine expansions and never required a new mine EIS.
- Talon ore and mine waste could be stranded in Minnesota.

"[W]e can push forward this mine in the permitting process and hopefully get a permit while we're also exploring for additional nickel resources in Minnesota." Talon chief external affairs officer Todd Malan (June 2023)

Requests for the EIS process:

- Delay EIS scoping until after Talon releases its prefeasibility/feasibility report.
- At least, reopen EIS scoping process for additional public comment on all issues after Talon releases its prefeasibility/feasibility report.
- The EIS should be based on a project scope that reflects the full geographic location of Talon's mineral reserves and plans, not an artificially small project.
- The EIS should evaluate the concepts for Talon's ore processing and tailings disposal in North Dakota and Michigan as alternatives.



There are Many Reasons for Concern about the Talon Mine

24/7 Operations. Drilling, blasting, traffic, noise, and bright lights would operate 24/7, affecting nearby residents and wildlife, including the Northern Long-Eared Bat, an endangered species.

Toxic Air Emissions. Air pollution from the Talon Mine including nickel, particulates, elongate mineral particles, and diesel, could increase cancer and lung disease for workers and residents.

Limited Health Analysis. DNR's draft EIS scope rejected the process of independent Health Impact Assessment recommended by 1000s of doctors in Minnesota and adopted by the National Council of American Indians as a result of Mille Lacs Band of Ojibwe leadership.

Bad Precedent. The PolyMet/NewRange mine could revive at any time, and the leasing ban protecting the Boundary Waters watershed from Twin Metals was lifted by Congress.

If the Talon EIS limits analysis to an artificially small mine and moves forward with an incomplete plan unsupported by feasibility or engineering reports, it sets precedent that could allow skimpy EIS review, bait-and-switch, and harm across all Minnesota watersheds where sulfide ore mines are now proposed—Mississippi River, Lake Superior, and Boundary Waters.



What Is Your Next Step to Protect Water and Communities?

www.WaterLegacy.org



Scan & Comment on Talon Mine



TALONS OFF!

**DEFEND MINNESOTA
WATERS & COMMUNITIES**



Scan & Join Us at Public Meetings

Comment on Talon Mine Scoping, Share with Others, Let Us Know if You Can be Present or Comment at a Meeting!