

MEMORANDUM

To: State Director, Eastern States Office

From: Acting Field Manager, Northeastern States Field Office

Subject: Recommendation for NEPA Analysis, Twin Metals Minnesota Lease Renewal and the Inco Shaft Bulk Sample project.

Date: September 6, 2013

Lease Renewal:

After reviewing the status of all previously conducted NEPA compliance for the area in question, it is my recommendation to conduct an environmental assessment (EA) for the renewal of Twin Metals Minnesota leases MNES-001352 and MNES-001353. The original leases were approved in 1966 prior to the implementation of the National Environmental Policy Act (NEPA) of 1969 and the lands involved have never been fully evaluated to determine the environmental impacts of potential ground disturbing activities on resource values such as vegetation, water, and recreation. To this point, for this lease, NEPA documents have authorized:

- mineral exploration drilling and geophysical activities to collect geologic information and drill core samples (Kawishiwi EA)
- approval of prospecting permits (Hardrock Prospecting Permits Environmental Impact Statement (EIS))
- several modifications to existing operating plans approved through Categorical Exclusion (CX) documents

An Environmental Assessment for the lease renewal will provide the Eastern States with a defensible analysis document. The EA would inform our lease renewal process, allowing us to properly design mitigation measures and stipulations attached to the lease. Although regulations do allow us to apply at Categorical Exclusion to the lease renewal process, given the lack of previous NEPA analysis, the BLM would have no real defensible analysis in which to base our lease renewal conditions and stipulations.

Inco Shaft Bulk Sample Project:

The above described NEPA Analysis situation applies to the proposed Inco Shaft Bulk Sample project. Given the lack of applicable analysis and concerns expressed by the US Forest Service, State of Minnesota, and BLM NSFO staff over noise, transportation related issues and water related issues it is our intention to conduct an Environmental Assessment prior to approving the proposed activity related to the Inco Shaft Bulk Sampling.