

Lemm, Les P (BWSR)

From: Anne Williamson <awilliamson@twin-metals.com>
Sent: Friday, December 18, 2015 1:53 PM
To: Lemm, Les P (BWSR)
Subject: Twin Metals Minnesota Comments on Possible Wetland Conservation Rule Amendments

December 18, 2015

Mr. Les Lemm
Minnesota Board of Water and Soil Resources
520 Lafayette Road North
St. Paul, MN 55155

Dear Mr. Lemm:

Twin Metals Minnesota LLC is a company focused on developing and operating an underground copper, nickel, platinum, palladium, gold and silver mining project in the Iron Range region of northeast Minnesota. Twin Metals is currently in the early stages of project development. Twin Metals offers the following comments in response to the Minnesota Board of Soil and Water Resources (BWSR) invitation for comments regarding possible amendments to the rules governing wetland conservation:

- Rules should be developed for an in-lieu fee program that provides an alternative for projects located in Bank Service Areas (BSA) where mitigation bank credits are limited or not available. If bank credits are unavailable in sufficient type or quantity, as is often the case in BSA 1, an in-lieu fee program should give permittees the opportunity to provide compensatory mitigation through fees paid to mitigation projects approved by BWSR. In these cases, in-lieu fee payments should be considered as equivalent in priority to bank credits in the same BSA as the project being permitted.
- The benefits of an in-lieu fee program to Minnesota would be to promote large, sustainable wetland replacement projects in the highest priority areas within the state. Also, such a program would increase the appeal to permittees of providing mitigation in advance of impacts, thereby accelerating enhancements to the state's wetland resources. Permittees would benefit from the certainty that compensatory mitigation options other than bank credits and self-performed mitigation will be available regardless of the timing of projects being considered for the future.

Respectfully,

Anne L. Williamson
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