

COMPREHENSIVE COMMENTS IN STRONG OPPOSITION TO THE BEND METALLIC MINERAL EXPLORATION PERMIT, CHEQUAMEGON-NICOLET NATIONAL FOREST, TAYLOR COUNTY, WISCONSIN

Public comment cut off is July 31st

TO : the main USFS & BLM regulators.

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CC: the DNR regulators so that all regulators know citizens are concerned.

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To the Wisconsin Department of Natural Resources (WDNR), U.S. Forest Service, and All Concerned Authorities,

These comments are submitted in unequivocal opposition to the nonferrous metallic mineral exploration permit granted to Green Light Wisconsin LLC (GreenLight Metals Inc.) for the Bend site in Taylor County, Wisconsin. The proposed activities, even at the exploration phase, and certainly any potential future commercial mining operation, present an unacceptable level of risk to Wisconsin's invaluable natural resources, human health, and protected species.

This opposition is rooted in a comprehensive assessment of potential consequences, direct contradictions and alleged violations of state and federal codes, the company's regulatory history, and well-documented precedents from similar mining projects.

A. Water Quality and Hydrological Integrity Concerns

The project's interaction with Wisconsin's water resources presents the most critical and contested areas of concern, with potential for direct violations of state and federal codes.

1. Inadequate Stormwater Permitting and Legal Challenge:

The project operates under a Construction Site Storm Water Runoff General Permit (No. WI-S067831-06) (Wisconsin Department of Natural Resources, 2021a).

However, the Lac du Flambeau Band of Lake Superior Chippewa has filed a lawsuit arguing that this permit is insufficient and that a more stringent Industrial Storm Water Permit is required for metallic mineral exploration activities (Kaeding, 2023a).

While a Taylor County judge denied the tribe's request to halt the project based on this argument, the core contention remains: the nature of metallic drilling, with its inherent potential to expose sulfide minerals and generate specific waste, inherently carries a higher risk of contaminating stormwater than typical construction, thus warranting a more robust permit under **Wisconsin Administrative Code NR 216 (Wisconsin Department of Natural Resources, 2021a)** and the broader intent of **Chapter 281, Wis. Stats. (Wisconsin State Legislature, n.d.-a)**.

2. Allegations of Direct Groundwater Contamination via Unlined Sumps:

The [GLW_Schematic%20Sump_Dewatering_Cementing_and_Backfilling.pdf](#) document outlines a process where decanted water from sumps is allowed to "drain around the liner into the subsoil" (Department of Natural Resources, 2025, p. 3).

Opponents, including the Wisconsin Resources Protection Council, allege that Green Light Metals struck the groundwater table when excavating waste pits, leading to "petroleum lubricants (never tested for PFAS content) and sulfuric acid drilling water... being discharged directly down into the groundwater" (Redman, 2025; Wisconsin Public Radio, 2025).

If these allegations are accurate, this would constitute a direct and severe violation of Wisconsin's groundwater quality standards under NR 140 (Wisconsin Department of Natural Resources, 2025a) and contradict the terms of their Dewatering Operations General Permit (WI-0049344-05-0) (Wisconsin Department of Natural Resources, 2021b).

This permit explicitly states it is not applicable to "Discharges of contaminated groundwater (treated or untreated)" (Wisconsin Department of Natural Resources, 2021b, p. 2). The DNR, however, attributes water in sumps to percolating rainwater within a confining soil layer, not the deeper regional groundwater (Department of Natural Resources, 2025, p. 3).

This factual dispute highlights a critical area of concern regarding groundwater protection and potential non-compliance.

3. Acid Mine Drainage (AMD) Risk:

The exploration for nonferrous metallic minerals, which often occur with sulfide minerals, inherently carries a high risk of generating acid mine drainage (AMD) when exposed to air and water (National Wildlife Federation, n.d.; Sierra Club Wisconsin, n.d.).

AMD can release highly acidic, metal-laden leachate that contaminates groundwater and surface waters for centuries, **directly undermining the protective goals of Wisconsin Statutes 295.60 (Wisconsin Department of Natural Resources, n.d.-b) and 295.605 (Wisconsin Department of Natural Resources, n.d.-c), and the federal Clean Water Act (CWA).**

4. Inadequate Initial Wetland Delineation:

The project's initial wetland determination (September 2022) identified only two wetlands, but DNR staff later discovered five additional ephemeral wetlands during an on-site inspection in July 2025 (Department of Natural Resources, 2025, p. 4).

While the DNR states that impacts to these newly identified wetlands can be avoided (Department of Natural Resources, 2025, p. 4), the initial failure to identify these crucial hydrological features indicates an inadequate baseline environmental assessment.

This raises concerns about the thoroughness of the initial permit application process and its adherence to NR 103 (Wisconsin Department of Natural Resources, n.d.-d; Wisconsin Department of Natural Resources, n.d.-e), which establishes water quality standards for wetlands and aims to protect their functional values.

5. PFAS Contamination Concerns:

While the DNR has confirmed that Green Light Wisconsin's approved drilling fluids do not contain PFAS (Per- and Polyfluoroalkyl Substances) (Department of Natural Resources, 2025, p. 2), the broader context of widespread PFAS contamination in Wisconsin's groundwater (Clean Wisconsin, 2019; Wisconsin Department of Natural Resources, n.d.-f) creates significant public anxiety.

Even with project-specific compliance, the pervasive nature of these "forever chemicals" (Clean Wisconsin, 2019) means any potential for new sources of contamination is viewed with extreme caution, underscoring the **need for rigorous, ongoing monitoring under NR 140 (Wisconsin Department of Natural Resources, 2025a).**

6. Transparency of Drilling Fluid Additives:

The project utilizes drilling fluids consisting mainly of treated water and bentonite, with "minor additives from the list of DNR-approved drilling and sealing products, if any" (Department of Natural Resources, 2025, p. 2).

While the DNR states it has reviewed ingredient lists and safety data sheets for these additives and found no PFAS (Department of Natural Resources, 2025, p. 2), the term "minor additives" and the potential for proprietary formulations raise concerns about full public transparency.

Without **complete public disclosure of the chemical composition of all additives, it is impossible for independent parties to fully assess the potential for other harmful substances**, even if not PFAS, that could impact the environment or human health.

B. Land Use, Ecosystem, and Species Protection

The project's location within a sensitive national forest and floodplain raises significant concerns for land integrity, biodiversity, and protected species.

1. Floodplain Development Risks:

The drill site is confirmed to be "in a floodplain zone with sensitive aquatic resources" (Department of Natural Resources, 2025, p. 1). **This subjects the project to stringent regulations under NR 116 (Wisconsin Department of Natural Resources, n.d.-g) and Taylor County Code Chapter 29 (Taylor County, WI, n.d.-a), which regulate "development" (including drilling) in floodplains to protect life, health, and property.**

Specific mitigation standards, such as the prohibition of sump pits and mandatory use of re-circulation tanks if water table depths are less than 15 feet in floodplains (Taylor County, WI, n.d.-b), are critical. **The alleged use of unlined sumps for contaminated water, particularly if groundwater is shallow, would be a direct violation of these protective measures.**

2. Threats to Endangered and Threatened Species, Including the Gray Wolf:

The project area is habitat for various state and federally listed endangered, threatened, and sensitive species. The **northern long-eared bat** (Kaeding, 2023a), a federally endangered species, is a specific concern. Other vulnerable species include the **Wood Turtle** (state-threatened) and the Northern Goshawk (USFS Sensitive Species) (Wisconsin Public Radio, 2023a). Aquatic species, including various listed **freshwater mussels**, are highly sensitive to water quality degradation.

The gray wolf is a federally protected endangered species in the lower 48 states, including Wisconsin, as of February 10, 2022 (Wisconsin Department of Natural Resources, n.d.-k; Wisconsin Department of Natural Resources, n.d.-l). Wolves naturally expanded their range into northern Wisconsin and occupy suitable habitats, with a healthy and secure population in the state (Wisconsin Department of Natural Resources, n.d.-k; Wisconsin Department of Natural Resources, n.d.-m; Wolf.org, n.d.).

While the Wisconsin DNR has an updated wolf management plan (Wisconsin Department of Natural Resources, n.d.-k; Wisconsin Department of Natural Resources, n.d.-l), and the project's compliance framework includes adherence to "detailed conditions for endangered resources" (Kaeding, 2023b), **a specific, publicly available assessment by the U.S. Fish and Wildlife Service (USFWS) for this particular project is crucial. Federal agencies are required by the Endangered Species Act (ESA) to consult with the USFWS to ensure their activities do not "jeopardize the continued existence of listed species or adversely modify designated critical habitats" (U.S. Fish and Wildlife Service, n.d.).** The adequacy of a general state plan or broad conditions for a project with potential for water contamination and habitat disturbance in a known wolf range is questionable without a specific, detailed USFWS consultation and impact assessment for the Bend site.

Habitat loss, fragmentation, water/soil contamination, and noise/vibration from drilling can severely impact these species, disrupting their breeding, foraging, and migration patterns. **This directly impacts compliance with the federal**

ESA and Wisconsin's s. 29.604, Wis. Stats. (Wisconsin Department of Natural Resources, n.d.-h; Wisconsin Department of Natural Resources, n.d.-n).

C. Air Quality and Soil Contamination:

1. Exploration activities generate particulate matter (dust) and emissions from equipment. **These are regulated under Wisconsin Statutes Chapter 285 (Wisconsin State Legislature, n.d.-b) and Chapter 293 (Wisconsin Department of Natural Resources, 2023a), as well as the federal Clean Air Act (CAA). While 40 CFR Part 60 Subpart LL (U.S. Environmental Protection Agency, n.d.-b; U.S. Environmental Protection Agency, n.d.-d) primarily applies to full-scale processing plants, the general principles of air pollution control are relevant.**
2. Soil contamination from drilling spoils and, if mining proceeds, vast quantities of tailings, poses a significant risk of heavy metal pollution. **This is regulated under NR 182 (Wisconsin State Legislature, n.d.-c) and NR 131/132 (Wisconsin Department of Natural Resources, n.d.-i; Wisconsin Department of Natural Resources, n.d.-j).**

D. Socio-Cultural and Historical Impacts

The project's location within traditional tribal territories raises profound concerns regarding cultural heritage and tribal sovereignty.

1. Inadequate Archaeological/Historic Resource Consideration:

The Lac du Flambeau Band of Lake Superior Chippewa's lawsuit explicitly states that the WDNR failed to adequately consider the effects of the drilling on "cultural and historic sites known as the Big and Little Indian Farms that are linked to historic Indian trails and burial sites" (Kaeding, 2023a).

This suggests that required archaeological or historical assessments, or the consideration of their findings (especially from a tribal perspective), were insufficient. **This directly relates to compliance with the federal Archaeological and Historic Resources Protection Act (ARPA) (National Park Service, n.d.-a; U.S. Department of the Interior, n.d.), which protects archaeological resources on public and Indian lands and prohibits public disclosure of sensitive site information (National Park Service, n.d.-b).**

The Ho-Chunk Nation has also formally opposed Green Light Metals' activities, citing concerns for sacred cultural sites within their former treaty territories (Chappell, 2022; Ho-Chunk Nation Legislature, 2022).

2. Tribal Sovereignty Concerns:

The legal challenges and formal opposition from multiple Native American tribes underscore a fundamental concern about tribal sovereignty and the protection of their inherent rights to their homelands and resources (Chappell, 2022; Ho-Chunk Nation Legislature, 2022; Kaeding, 2023a). The tribes assert their

constitutional power to protect their "air, water, surface, subsurface, natural resources and interest" (Chappell, 2022).

E. Long-Term Risks and Reclamation Adequacy

The long-term environmental liabilities associated with metallic mining, even from exploration, raise serious questions about the adequacy of current plans.

1. Inadequate Reclamation for Perpetual Pollution:

While the exploration license requires a bond to cover drillhole abandonment costs (Green Light Wisconsin LLC, 2025; Kaeding, 2023b) and outlines procedures for filling holes (Wisconsin Department of Natural Resources, n.d.-i), no current reclamation technology can guarantee the prevention of acid mine drainage and heavy metal contamination for the hundreds or even thousands of years that these pollutants can persist from sulfide mines (National Wildlife Federation, n.d.; Sierra Club Wisconsin, n.d.).

This perpetual pollution liability is a major concern not fully addressed by short-term reclamation plans under NR 131 (Wisconsin Department of Natural Resources, n.d.-i) or NR 132 (Wisconsin Department of Natural Resources, n.d.-j).

2. Bond Adequacy for Catastrophic Events:

While a bond is in place, its adequacy for potential catastrophic events or centuries of active remediation (e.g., perpetual water treatment) is questionable, potentially leaving taxpayers with the burden of cleanup. Wisconsin Statutes 295.60 (Wisconsin Department of Natural Resources, n.d.-b) requires financial assurances, but the long-term effectiveness of these mechanisms for sulfide mines is a widely debated issue.

3. Temporarily Abandoned" Boreholes:

The existence of "two temporarily abandoned boreholes" at the Reef deposit (another GLW project) since at least 2022, with plans for permanent abandonment in late 2025 (Green Light Wisconsin LLC, 2025), raises concerns about the timeliness of site closure and potential long-term environmental exposure from open drill holes.

F. Precedent and Historical Context

The concerns about the Bend project are amplified by the documented history of metallic mining failures and a significant shift in Wisconsin's regulatory landscape.

1. Repeal of "Prove It First" Law:

The 2017 repeal of Wisconsin's "Prove It First" mining law (National Wildlife Federation, n.d.; Sierra Club Wisconsin, n.d.; Wisconsin Public Radio, 2023a), which required companies to demonstrate a metallic sulfide mine had operated and closed for at least 10 years without causing pollution, fundamentally

weakened environmental safeguards. This repeal, seen as fast-tracking permitting (Sierra Club Wisconsin, n.d.), directly contributes to increased public and tribal skepticism about any metallic mining activity in the state.

2. Documented Consequences of Similar Mining Projects:

- a) **Flambeau Mine, Wisconsin:** This mine, which operated until 1997, has been cited as having caused pollution, serving as a direct catalyst for the original "Prove It First" law (Kaeding, 2023a; Save the Boundary Waters, n.d.).
- b) **Zortman-Landusky Gold Mine (Montana):** Experienced multiple cyanide spills and significant acid mine drainage, leading to widespread surface and groundwater contamination and substantial cleanup liabilities (Montana Environmental Quality Council, 2004; SERC, n.d.).
- c) **Morenci Mine (Arizona):** Documented history of unauthorized wastewater releases, including sulfuric acid and metal contamination of surface water and groundwater, often due to operator error or inadequate containment (U.S. Environmental Protection Agency, 2020; U.S. Environmental Protection Agency, 2015).
- d) **Bagdad Mine (Arizona):** Concerns regarding tailings impoundment failures, acid mine drainage, and groundwater monitoring (Arizona State Land Department, n.d.; Freeport-McMoRan, 2024a; Freeport-McMoRan, 2024b; U.S. Environmental Protection Agency, n.d.-a).
- e) **Zambia Copper Mines (Sino Metals Leach Zambia):** A recent tailings dam collapse in February 2025 released over 50 million liters of toxic waste into the Kafue River, causing widespread environmental damage, contaminating water supplies, crops, fish, and livestock (International IDEA, 2025).

These examples collectively demonstrate the severe and often long-lasting environmental and social consequences that can arise from metallic mining operations, particularly in the context of acid mine drainage and tailings management.

Conclusion and Call for Action

Given the confirmed location in a sensitive floodplain, the documented inadequate initial wetland assessment, the alleged direct groundwater contamination, the ongoing legal challenge to stormwater permitting, the threats to protected species and sacred tribal sites, the company's problematic regulatory history, and the overwhelming evidence of perpetual pollution from similar mining projects, this exploration permit poses an unacceptable risk to Wisconsin's environment and its citizens.

We urge the Wisconsin Department of Natural Resources and all relevant federal agencies to:

- Revoke or Suspend the current exploration permit.

- Conduct a comprehensive and independent Environmental Impact Statement (EIS) that fully accounts for all potential short-term and long-term impacts, including those on wetlands, floodplains, groundwater, air quality, and all listed species, with robust tribal consultation.
- Mandate the appropriate Industrial Storm Water Permit for any metallic mineral exploration or mining activity.
- Ensure that any future proposals strictly adhere to all Wisconsin and federal environmental protection laws with no compromises on water, air, soil, or biodiversity.
- Prioritize the protection of Wisconsin's natural heritage over short-term industrial interests.

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