



January 19, 2022

BLM Eastern States Office
F. David Radford, Deputy State Director of Geospatial Services
5275 Leesburg Pike
Falls Church, Virginia 22041

To whom it may concern:

On behalf of the Area Partnership for Economic Expansion (APEX), which represents more than 85 leading regional businesses, I'm submitting a formal comment related to the U.S. Forest Service's (USFS) proposed mineral and land withdrawal in the Superior National Forest (SNF) in northeast Minnesota.

APEX is a business and economic development organization based in Duluth and serving ten counties in northeast Minnesota and northwest Wisconsin. Our mission is to leverage private sector resources to drive investment throughout the region. Therefore, we strongly oppose and call for the USFS and U.S. Bureau of Land Management (BLM) to immediately rescind the proposal to withdraw 225,378 acres of minerals and land from future exploration and development.

To be clear, our organization views the environmental assessment initiated by the USFS as unwarranted, unnecessary and inconsistent with current regulatory requirements, the Superior National Forest management plan and laws passed by Congress to protect the Boundary Waters Canoe Area Wilderness. Mining projects must be allowed to follow the established, transparent, predictable and fair environmental review process currently in place after a company submits a formal mining project proposal.

A generic environmental assessment is not effective in determining whether mining can be done safely in this region. Every mining project is unique in its geological characteristics, the surrounding environment, and the details of its project design, and therefore, each one must be evaluated based on this project-specific information to determine whether it can proceed safely under the standards in place. A full Environmental Impact Statement (EIS) on a mining project proposal should be required to make an informed decision based on science.

If, however, the established environmental analysis does proceed, the USFS and BLM must consider these points:

1. The environmental assessment must account for the several objective state and federal agency studies that exist supporting the compatibility of mining and environmental protection in the region, including the EIS conducted by the USFS in crafting the 2004 Superior National Forest (SNF) "Land and Resource Management Plan," which established mining as a "Desired Condition" for the SNF; the 2012 USFS "Federal Hardrock Mineral Prospecting Permits – Final EIS" utilized by the USFS in supporting the issuance of 29 federal hardrock prospecting permits in the SNF; and the denial of the programmatic EIS proposed in 2015.
2. The environmental assessment must consider the current regulatory processes of the Environmental Protection Agency, Minnesota Department of Natural Resources, Minnesota Pollution Control Agency, sovereign tribal nations, and other local and federal agencies that already protect the Boundary Waters Canoe Area Wilderness and that must be followed in order to obtain a permit to mine. The USFS and BLM must demonstrate why the

proposed mineral withdrawal is needed when existing laws are more than adequate.

3. The environmental assessment must address the adverse direct economic impact of the withdrawal and a forecasted impact of future regional investment and impact on long-term growth to the region. The EIS should consider the loss of \$1.5 billion in annual wages, and more than \$2.5 billion in annual economic production based on studies conducted by the University of Minnesota Duluth. And, study the reduction in number of available future jobs people of the Northeast Minnesota region depend on to put food on the table, provide educational opportunities for their kids and build good careers. Additionally, the environmental assessment should study direct impacts to surrounding communities on this loss of wages and economic production; and, what would happen to individual cities surrounding the proposed withdrawal area. How many businesses will close, how much more food shelf donations will be needed and how many families that have lived here for generations will need to pack up and leave for good to find a livelihood elsewhere.
4. The environmental assessment must study the implications to the region's healthcare system, infrastructure of continuing declining populations, lagging personal incomes, and increasing seasonal residency. The environmental assessment should study the disparity in health insurance coverage available to families in the region, whether they must depend on seasonal tourism jobs with few or no benefits, or whether jobs are available that provide strong healthcare benefits.
5. The USFS and BLM must evaluate the negative impacts of this chilling effect on future investments throughout the APEX region, and the states of Minnesota and Wisconsin. The withdrawal proposal ultimately prevents industries from even proposing a project in the Superior, Chippewa or Chequamegon-Nicolet National Forests, and reduces the probability of businesses investing in our communities and workers here in our backyard.
6. Finally, the environmental assessment must study the impact to the economic strength and security of the U.S. in denying the exploration and mining of these resources within the proposed withdrawal area. Northeast Minnesota has one of the largest known undeveloped deposits of strategic metals in the world. Exponential demand growth is projected for these minerals including nickel, cobalt and copper over the next 20 years needed to combat the climate crisis. If we don't source these minerals domestically, then the USFS and BLM must consider the human rights and environmental costs of continuing to source these materials from other countries where worker and environmental standards are often nonexistent. Also, the environmental assessment must address the impact taking these minerals off the table have for securing our domestic supply chains that have been devastated by the global issues arisen by the pandemic.

Our organization and the businesses it represents stand by the fact that removing these lands and minerals from future mining projects will cause the state to lose thousands of potential jobs, billions of dollars in future investment in northeast Minnesota and billions of dollars in potential revenues that support the state's K-12 education system. The people of our region have a strong work ethic and understand protections are in place to allow the mining sector to grow thousands of well-paying jobs as well as preserve the environment. We strongly urge the USFS and BLM to ultimately rescind the withdrawal proposal. If the environmental assessment proceeds, the USFS and BLM must consider the six points outlined above.

Sincerely,



Brian W. Hanson
President and CEO
APEX, the Area Partnership for Economic Expansion