

American Canoe Association \* Alaska Wilderness League \* American Rivers \* Black Hills Clean Water Alliance \* Boise Idaho Chapter of Great Old Broads for Wilderness \* Campaign to Save the Boundary Waters \* Center for Biological Diversity Conservation Minnesota \* Conservatives for Responsible Stewardship \* Crow River Trail Guards \* Defenders of Wildlife E.C. Oberholtzer Foundation \* Earthjustice \* Earthworks \* Endangered Species Coalition \* Environment America Environment Minnesota \* Environmental Action \* Environmental Law & Policy Center Environmental Protection Information Center \* Freemans Explore LLC \* Friends of the Boundary Waters Wilderness Friends of the Earth US \* Great Old Broads for Wilderness \* High Country Conservation Advocates \* Hip Hop Caucus Kentucky Heartwood \* Klamath Forest Alliance \* League of Conservation Voters \* League of Women Voters Duluth Mining Action Group of the Upper Peninsula Environmental Coalition \* Mining Impact Coalition of Wisconsin Minnesota Center for Environmental Advocacy \* Minnesota Division Izaak Walton League of America Minnesota Public Interest Research Group \* National Parks Conservation Association Northeastern Minnesotans for Wilderness \* Save Our Cabinets \* Science & Environmental Health Network Sierra Club \* Sierra Club North Star Chapter \* The Conservation Alliance \* The Wilderness Society UPEC Mining Action Group \* Voyageurs National Park Association

Thursday, May 31, 2018

The Honorable Ryan Zinke  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

The Honorable Sonny Perdue  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, DC 20250

Dear Secretaries Perdue and Zinke,

We, the undersigned conservation organizations, write to express our grave concerns with the Department of Interior's recent action to reinstate expired minerals leases held by Antofagasta's Twin Metals Minnesota, and to request an immediate suspension of all mineral development authorizations in the Superior National Forest during the U.S. Forest Service's on-going study of a proposed mineral withdrawal on 234,328 acres of public lands within the Rainy River watershed and adjacent to the Boundary Waters Canoe Area Wilderness. A suspension of all authorizations related to mineral development should include a halt to any action on the applications to renew the two now reinstated mineral leases, and any permitting, leasing, or other approvals by either the Bureau of Land Management or the Forest Service.

As you are aware, the Forest Service study commenced on January 13, 2017, and began a two-year moratorium on new leasing activities. This study will be the basis for a decision by Secretary Zinke on the request by the Forest Service to withdraw from the federal mineral leasing program 234,328 acres of Superior National Forest lands for the maximum period of twenty years. Both Secretaries have voiced their support for the study. At a U.S. House hearing on May 25, 2017, Secretary Perdue responded to a question about the Forest Service study as follows: "...your statement there regarding the two-year study over the sound science.... [W]e are absolutely allowing that to proceed." Secretary Zinke responded to a similar question during an April 11, 2018 U.S. House hearing as follows: "I agree that there are some areas that are too precious to mine."

Even though the study will be completed by January 2019, the Department of Interior has moved aggressively to reinstate expired mineral leases within the very area being considered for a mineral withdrawal. This approach severely undercuts the study and violates the spirit of the two-year moratorium. It also disregards the Forest Service's significant concerns, expressed in both the agency's denial of consent to the renewal of the Twin Metals leases and in its application for the proposed withdrawal, that sulfide-ore mining is not an appropriate activity in the watershed of the Boundary Waters. It eliminates the public from involvement and goes against the will of 70% of Minnesotans. And it raises serious questions about the Department of Interior's willingness to protect our most cherished public lands and waters from the threats of industrial development and irremediable contamination.

The Boundary Waters is the most visited wilderness area in the country, spanning 1.1 million acres of interconnected waterways and forests in northeastern Minnesota. The Superior National Forest, which includes the Boundary Waters, contains 20 percent of all the freshwater in the 193 million-acre National Forest System. Downstream from the Boundary Waters are Voyageurs National Park and Canada's Quetico Provincial Park.

These wild lands are an important part of the regional economy, and much of the economic infrastructure – businesses, resorts, lodges, outfitters, campgrounds, homes, Boundary Waters entry points, and more – is located in the Boundary Waters watershed, the area under review in the Forest Service study. Proposals to transform this area to a sulfide-ore copper mining district would displace local residents and many businesses, resulting in a potential loss of more than 27,000 jobs, \$1.4 billion in economic activity, and over \$500 million in lost property value in northeastern Minnesota.

Until the current Forest Service study, these and other environmental and socio-economic impacts of sulfide-ore mining in this area had never been studied or thoroughly vetted with the public. The National Environmental Policy Act (NEPA), which requires agencies to look before they leap, was enacted in 1970, several years after the Twin Metals leases were first issued. By analyzing scientific data, consulting the public, and considering alternative courses of action, NEPA supports informed decision making – here, whether sulfide-ore mining in the Boundary Waters watershed is an appropriate activity.

We respectfully request that you allow appropriate space for that study to be completed in a rigorous, science-based, and transparent fashion. Reinstating 52-year-old leases in the middle of an on-going two-year study considering how that very action could harm the Boundary Waters Canoe Area Wilderness simply makes no sense. Thus, we ask that you suspend all additional mineral development authorizations on the segregated lands to allow the Forest Service to fully analyze the environmental, economic, and social impacts of sulfide-ore mining in this unique ecosystem and landscape. We look forward to your response.

Sincerely,

American Canoe Association  
By Brett Mayer

Alaska Wilderness League  
By Leah Donahey

American Rivers  
By Brendan Mysliwicz

Black Hills Clean Water Alliance  
By Liliias Jarding, Ph.D.

Boise Idaho Chapter of Great Old Broads for Wilderness  
By Pamela Conley

Campaign to Save the Boundary Waters  
By Becky Rom

Center for Biological Diversity  
By Marc Fink

Conservation Minnesota  
By Nels Paulsen

Conservatives for Responsible Stewardship  
By David Jenkins

Crow River Trail Guards  
By Tom Koshiol

Defenders of Wildlife  
By Katie Taylor

E.C. Oberholtzer Foundation  
By Beth Waterhouse

Earthjustice  
By Blaine Miller-McFeeley

Earthworks  
By Aaron Mintzes

Endangered Species Coalition  
By Tara Thornton

Environment America  
By John Rumpler

Environment Minnesota  
By Tim Schaefer

Environmental Action  
By Sally King

Environmental Law & Policy Center  
By Ann Mesnikoff

Environmental Protection Information Center  
By Thomas Wheeler

Freemans Explore LLC  
By David Freeman

Friends of the Boundary Waters Wilderness  
By Kara Josephson

Friends of the Earth US  
By Nicole Ghio

Great Old Broads for Wilderness  
By Lauren Berutich

High Country Conservation Advocates  
By Matt Reed

Hip Hop Caucus  
By Mark Antoniewicz

Kentucky Heartwood  
By Jim Scheff

Klamath Forest Alliance  
By Kimberly Baker

League of Conservation Voters  
By Arian Rubio

League of Women Voters Duluth  
By Gay Trachsel

Mining Action Group of the Upper Peninsula Environmental Coalition  
By Kathleen Heideman

Mining Impact Coalition of Wisconsin  
By Dave Blouin

Minnesota Center for Environmental Advocacy  
By Kevin Lee

Minnesota Division Izaak Walton League of America  
By Noreen Tyler

Minnesota Public Interest Research Group  
By Mary Franz

National Parks Conservation Association  
By Ani Kame'enui

Northeastern Minnesotans for Wilderness  
By Jon Nelson

Save Our Cabinets  
By Mary Costello

Science & Environmental Health Network  
By Ann C Manning

Sierra Club  
By Athan Manuel

Sierra Club North Star Chapter  
By Margaret Levin

The Conservation Alliance  
By Josie Norris

The Wilderness Society  
By Chris Rackens

UPEC Mining Action Group  
By Kathleen Heideman

Voyageurs National Park Association  
By Christina Hausman

W. J. McCabe (Duluth) Chapter, Izaak Walton League of America  
By Richard Staffon

Waterkeeper Alliance  
By Larissa Liebmann

WaterLegacy  
By Paula G. Maccabee

Weber Sustainability Consulting  
By Ivan Weber

Wilderness Watch  
By Kevin Proescholdt

Cc: Deputy Interior Secretary David Bernhardt  
Associate Deputy Interior Secretary Jim Cason  
Assistant Interior Secretary Joe Balash  
Special Advisor Kathy Benedetto  
Acting Eastern States Director Mitch Leverette  
Special Advisor Brian Klippenstein  
Acting USDA Deputy Under Secretary Dan Jiron  
Interim Forest Service Chief Vicki Christiansen  
Regional Forester Kathleen Atkinson  
Superior National Forest Supervisor Connie Cummins