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Docket Number DOI-2021-0013

December 8, 2021

Draft List of Critical Minerals

MS-102

U.S. Geologic Survey

12201 Sunrise Valley Dr.

Reston, VA 20192

RE: Comments on the 2021 Draft List of Critical Minerals DOI-2021-0013

Dear USGS and U.S. Department of the Interior,

Please accept the following comments from the undersigned hunting, fishing, and conservation organizations regarding the Department of Interior/U.S. Geologic Survey's 2021 Draft List of Critical Minerals. (Docket Number DOI-2021-0013)

Since the passage of the General Mining Act of 1872, and in the days before modern environmental laws, hardrock mining in the west has left a scar of mining-impaired water quality that persists to this day. This has, of course, negatively impacted trout fisheries, municipal water supplies, agricultural production, wildlife populations, and outdoor recreation, to name a few. The Environmental Protection Agency (EPA) estimates 40% of headwater streams in the west are impaired by acid mine drainage and mining-related water quality degradation. Additionally, an analysis conducted by Trout Unlimited found that over 110,000 miles of streams in the contiguous United States are impaired by heavy metals and acidity. Of these impaired stream miles, 20% are within subwatersheds that contain native trout and salmon, while 52% are in subwatersheds that are important drinking water sources.

We understand the need for mining and support responsible minerals development where necessary and appropriate. However, thoughtful planning and an abundance of caution is needed to avoid and mitigate impacts when giving consideration to the development of mineral resources, and the need to ensure future restoration of impacted lands and waters.

In August 2019, a coalition of hunting and fishing groups and business, including the undersigned organizations, released a report on critical minerals, '[Critical Minerals – A Conservation Approach](#)'. As part of the development of this report and the associated tenets for responsible mineral development, Trout Unlimited's GIS mapping specialists developed an online [mapping tool](#) to help identify the known locations of critical mineral deposits and their nexus with protected natural resources and high-value public lands and waters. By working together to identify areas of conflict, we can avoid high-conflict zones with critical and sensitive habitats while prioritizing consideration of lower conflict areas that will provide greater certainty to both industry and fish and wildlife resources. Additionally, the report details several "critical" minerals and rational for these minerals to be included, or not, on the critical minerals list.

With our critical minerals report as our foundation, we respectfully provide the following comments on the 2021 draft list of critical minerals.

A) Methodology

We applaud the U.S.G.S. and Dept. of Interior for utilizing a more refined and comprehensive methodology to develop the current draft list. In particular, we are favorable to the identification of those minerals with a single pinch point in supply. This provides an opportunity to resolve this pinch point as a primary means of mitigating supply chain concerns for these minerals, especially pinch point mitigation that reduce the need for domestic mining. Additionally, we support the identification of minerals recovered as byproducts and their host minerals.

B) Deletions from the 2018 List

- a. Uranium – We fully support the removal of uranium from the critical minerals list, and for the exact reasons stated in the DOI’s draft list release documentation. In our report, we called for the removal of uranium from the 2018 list. Our rationale was that uranium is a fuel mineral and does not meet the definition of a critical mineral. Additionally, domestic production and imports from allies meet our needs well into the future.
- b. Potash, helium, rhenium, and strontium – Given the new methodology, we support the removal of these minerals. If a mineral does not meet the criteria and/or definition of a critical mineral, it should not be included on the draft list.

C) Additions to the 2018 List

As noted above, we support the refined methodology for determining what minerals should be included on the 2021 draft list. As such, we agree that the addition of zinc and nickel to the critical minerals list is warranted and urge the Biden Administration to prioritize alternatives to mining that help meet the demand for these minerals, such as recycling and research and development of new technologies that reduce the use of these minerals in renewable energy and other applications.

D) REE and Platinum Groups

Our group supports the break-out of the rare earth elements and platinum groups minerals. Each should be evaluated individually using the same methodology as the others. Doing so will help to identify those elements and minerals that truly meet the criteria to be considered “critical”.

In closing, we thank the USGS and the Department of the Interior for working to ensure a secure and reliable supply of the minerals important to national security, our economy, and greater application of renewable energy technologies. We hope you find our comments helpful and that our report provides useful background information for your consideration.

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