

January 10, 2021

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

Transmitted electronically to: BLM_ES_Lands@blm.gov

RE: Superior National Forest Withdrawal Application

Dear Deputy State Director Radford:

The undersigned groups representing hundreds of thousands of hunters and anglers across the country write to convey our support to withdraw, for a 20-year term, approximately 225,000 acres of National Forest System lands in the Rainy River/Boundary Waters watershed, from disposition under the United States mineral and geothermal leasing laws, subject to valid existing rights. Additionally, we offer the following comments regarding the associated environmental analysis that the United States Forest Service (USFS) will be conducting to analyze the impacts of the proposed withdrawal.

The Boundary Waters Canoe Area Wilderness (BWCAW) is America's most-visited Wilderness Area, supporting a regional outdoor recreation-based economy which relies on the over 165,000 visitors to the Wilderness annually. Many of these visitors enjoy the BWCAW for the unique hunting and fishing opportunities found only on these public lands and waters. With over 1,100 lakes accessible by canoe, trail, portage and USFS roads, the Boundary Waters' reputation as one of America's premier hunting and fishing destinations is well deserved.

We support a "stop and study" approach to any proposed sulfide-ore copper mineral leasing or development in the proposed withdrawal area of the Superior National Forest. Evaluating mining impacts one mine at a time inevitably leads to a complete transformation of the character of an area that might not have been allowed if it had been considered before the first mine was permitted. We request that the environmental analysis for the proposed minerals withdrawal study impacts associated with hardrock mineral development to nearby fish and wildlife, downstream public lands and waters and impacts to public access to the BWCAW. The types of impacts that should be considered on a cumulative basis by federal agencies in their review include, but are not limited to:

- Impacts of proposed development associated with access to these public lands for hunters, anglers and outdoor recreationists, including any businesses who use the BWCAW and rely on ongoing conservation efforts within the Superior National Forest to operate.
- Habitat degradation due to industrial effects of noise, traffic, light and increased fatal human-wildlife interactions (vehicle collisions, etc.)

- Wildlife reproductive patterns altered due to increased human presence, loss of habitat, and pollution, cumulative stresses (direct and indirect mortality, decline in reproductive success, or avoidance of higher-quality foraging, sheltering, mating, or thermal control habitat).
- Disruption of migration routes, effects on species sensitive to aquatic and aerial chemistry, effects on deer and deer-moose relationships, roadkill effects, road salt effects, invasive species interactions.
- Loss of critical stopovers for migrating species of birds.
- Spatial cascade of fragmentation effects including deer, moose, forest type and invasive species interactions.
- Other impacts that would conflict with recreational, residential, and wildlife uses include vibration and ground movement due to blasting; lighting; destruction and fragmentation of wildlife habitat and native plant communities; elimination of accessible public land; degradation of public waterways, loss of solitude; and irremediable water pollution.
- Cumulative impacts of water pollution from proposed sulfide-ore copper mining on fish and recreational fishing within the Rainy River Watershed, including lakes, streams supporting coldwater fisheries, and streams supporting warm water fisheries.
- Cumulative impacts of water pollution to game and nongame fish species identified in bodies of water included in the withdrawal area, including bioaccumulation of heavy metals in fish tissue associated with acid mine drainage (AMD) from hardrock mining.
- Impacts to Boundary Waters entry points and downstream recreational campsites open to the public.
- The ability for deep, cold lakes to continue serving as refugia habitat for coldwater fisheries (e.g., cisco, lake trout) in the face of climate change.

Thank you for the opportunity to submit comments regarding the application for mineral withdrawal in the Superior National Forest. The Boundary Waters Canoe Area Wilderness should remain a place where future generations of American hunters, anglers and paddlers can experience the world-class hunting and fishing available to the public, in perpetuity.

Sincerely,

American Fly Fishing Trade Association

Backcountry Hunters & Anglers

Fly Fishers International

Izaak Walton League of America

Minnesota Trout Unlimited

National Deer Association

National Wildlife Federation

Orion, the Hunter's Institute

Sportsmen for the Boundary Waters

Theodore Roosevelt Conservation Partnership

Trout Unlimited

Wildlife Management Institute