

August 12th, 2022

Rainy River Withdrawal EA Comment Review Team
c/o Matthew Judd, Project Manager
Superior National Forest
Supervisor's Office
8901 Grand Avenue Place
Duluth, Minnesota 55808

Subject: Rainy-River Watershed Minerals Withdrawal #60916

Transmitted electronically to BLM_ES_Lands@blm.gov & the project website <https://go.usa.gov/xuH43>

Dear Rainy River Withdrawal EA Comment Review Team, R9 Regional Forester Gina Owens, and U.S. Forest Service Chief Randy Moore,

The undersigned hunting, fishing, and wildlife conservation organizations and professional societies, write to convey our support for the proposed mineral withdrawal, for a period of 20 years, of approximately 225,504 acres of lands and minerals within the watershed of the Boundary Waters Canoe Area Wilderness (BWCAW) in the Superior National Forest (SNF). Additionally, we offer the following comments regarding the USFS proposed Rainy River Mineral Withdrawal.

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. The BWCAW supports a regional outdoor recreation-based economy that relies on over 165,000 visitors annually. Many of these visitors enjoy the BWCAW for the unique hunting and fishing opportunities found only on these public lands and waters.

The mineral withdrawal would instate a 20-year moratorium for sulfide-ore copper mining leases on federal public lands in the watershed upstream of the BWCAW. The Environmental Assessment provides a sound, science-based foundation for implementing measures to provide permanent protections for the BWCAW. With complete transparency, opportunities for public comment, and a thorough interagency review of extensive ecological and economic data, the study conducted by federal agencies has shown that the watershed of the BWCAW is no place for sulfide-ore copper mining.

The undersigned groups are not opposed to mining on public lands, and our support for the proposed 20-year mineral withdrawal stems from concerns related to proposed sulfide-ore copper mining upstream of the BWCAW, Voyageurs National Park, and Canada's Quetico Provincial Park. Unlike Minnesota's iron and taconite mines, sulfide-ore copper mining in this sensitive watershed threatens

fish, wildlife, water quality, and world-class camping, paddling, fishing, and hunting opportunities in one of our country's prized areas.

The diversity and value of fish populations in the BWCAW are a direct result of past efforts to maintain the pristine nature and ecological integrity of the region. Scientific literature is clear: acid mine drainage and heavy metals released during the sulfide-ore copper mining process in the watershed of the BWCAW would cause long-term declines in fish abundance, species number and genetic diversity, help facilitate the establishment of invasive species, and may render fish unfit for human consumption.

We recognize the importance of priority landscapes, such as the BWCAW, to the long-term conservation of fish and game, which contribute to world-class hunting and fishing opportunities in the United States. Thank you for recognizing the irreplaceable values of this waterscape, the risks and impacts associated with sulfide-ore copper mining, and for proposing a 20-year moratorium for mining on federal public lands in the Rainy River Watershed.

Sincerely,

American Fly Fishing Trade Association
American Sportfishing Association
Angler Action Foundation
Backcountry Hunters & Anglers
Bass Anglers Sportsman Society
Fly Fishers International
Izaak Walton League of America
National Deer Association
National Wildlife Federation
North American Grouse Partnership
Orion: The Hunter's Institute
Sportsmen for the Boundary Waters
Theodore Roosevelt Conservation Partnership
Trout Unlimited