

Gerald M. Tyler
P.O. Box 4
Ely, MN 55731

December 29, 2021

F. David Radford
Deputy State Director of Geospatial Services
BLM Eastern States Office
RE: Superior National Forest Withdrawal Application
5275 Leesburg Pike
Falls Church, Virginia 22041

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EASTERN STATES OFFICE
2022 JAN 26 A 9:22

Re: Superior National Forest Withdrawal Application

Dear Mr. Radford:

I write to you as a military veteran, having enlisted in the Marine Corps upon graduation from Amery High School in Wisconsin while I was 17 years old. I was honorably discharged in 1958 and I enrolled in college later that year.

I intended to obtain a degree in forestry and began my studies at the University of Wisconsin/Stevens Point. Unfortunately, no such coursework was available at that time and I moved on to the University of Wisconsin/River Falls and then on to the University of Wisconsin/Madison, where I was awarded a Bachelor of Science Degree from the School of Agriculture in 1962.

Like Secretary Haaland, I was employed while I was in law school. I entered law school while I was employed by a Minneapolis real estate developer, attending classes at night for four years. In 1967 I was awarded a Juris Doctor Degree from William Mitchell College of Law, St. Paul, Minnesota. After a long business career involving real estate development and life and health insurance, I moved to Ely 20 years ago, to retire.

I have been and am now, actively involved in promoting economic development in Northeastern Minnesota. Since 2012, with the help of prominent board members, I/we have managed two nonprofit 501 (c) (3) organizations, both based here in Ely.

One, *Ely Area Development Association* has been involved in promoting economic development in Ely since 1959. The other, *Up North Jobs Inc.*, is a membership organization I chartered in 2013. Up North jobs is especially active in promoting economic development and job growth in Northeastern Minnesota, emphasizing the importance of mining and the well-paying union jobs it creates.

Since 2012, Twin Metals Minnesota has been planning to develop a copper- nickel mine in the Rainy River Watershed. Since that time, it has invested more than \$500 million dollars in the project, prospecting and preparing studies. In December 2019, it submitted its Mine

Operating Plan to Minnesota and the federal government. When the necessary federal and state permits to mine have been obtained, Twin Metals will invest another \$1.7 billion dollars in the project to construct the mine. When fully operational, Twin Metals' mine will employ 750 well-paying, union labor mining jobs; another 1,500 jobs will be created in related industries.

Before the imposition of a 20-year moratorium, the Biden Administration must consider the loss of well-paying jobs the people of Northeastern Minnesota depend upon to feed and provide health care for their families - to purchase homes and educate their children. Twin Metals' opponents claim that copper-nickel mining is not needed and that tourism will sustain the region's economy. Yet, tourism never has been, isn't now and never will be the driving force behind our economy. Tourism is seasonal, from mid-June to the Labor Day weekend.

A Quarterly Census of Employment & Wages in Northeast Minnesota by the Minnesota Department of Employment and Economic Development found that the annual wages paid a miner in 2019 was \$97,655, while the annual wages paid a person employed in the hospitality/tourism industry, was \$22,968. The annual wages paid in all industries was \$43,710.

Taxes on minerals have supported Minnesota schools since the Minnesota School Trust Fund was established when Minnesota became a state. Mining royalties paid into the School Trust Fund each year support 900,000 K-12 students enrolled in Minnesota school districts. The Biden Administration must also consider the impact a 20-year moratorium would have on the School Trust Fund. If a moratorium is imposed, the School Trust Fund will lose billions of dollars in royalties Twin Metals and other mining companies would have paid into the Fund.

The imposition of a 20-year moratorium on mining will impede, impair and perhaps kill the development of Twin Metals' proposed mine and those of other mining companies - including *Teck*, *Encampment Minerals* and *Vermillion Gold* – all of which are presently exploring for minerals in the Rainy River Watershed. Investment by businesses in new projects will cease, our business communities will suffer, the population of our cities will continue to decline as well as k-12 enrollment in our schools.

For the foregoing reasons I strongly oppose the withdrawal of 225,000 acres of U. S. Forest lands in the Rainy River Watershed of the Superior National Forest for two years, from operation of the United States mineral and geothermal leasing laws, and the imposition of a 20-year moratorium on those lands by the Biden Administration.

Sincerely yours,



Gerald M. Tyler

cc: Deb Haaland
Secretary
Department of Interior
1849 C Street N.W.
Washington, D C 20240