

17 November 2021

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

RE: Superior National Forest Withdrawal Application

Dear Mr. Radford:

I write in strong support of the US Forest Service application to withdraw 225,378 acres of National Forest System lands in the Rainy River Watershed from disposition under the U.S. mineral and geothermal leasing laws. I'm happy to learn that the BLM will take two years to study the issue and solicit public comment; but I am also in firm support of withdrawal for the requested 20-year term.

Although I'm 70 years old, I am yet an avid outdoorswoman. I hike, backpack, camp, paddle, and basically enjoy nature at every opportunity. In fact, when I moved to Minnesota in 2017 from my hometown of Salt Lake City, Utah, my first encounter with the abundant wilds of this state was a five-day paddle through the Boundary Waters. It was truly a spiritual moment to see stars reflected on the dark, still waters of Basswood Lake. Born and raised in the desert, I had never seen anything like that before; I couldn't tell where earth ended and heaven began. I've described that moment for many people since. The eyes of those who've been there glaze over with memories of their own; the eyes of those who have never been, reflect awe, wonder and jealousy. That doesn't even count my goose bumps.

Being a desert rat, I bear special witness to the value of water. Especially water described as "extremely clean" and "immaculate" by the Minnesota Pollution Control Agency. You can't take that lightly.

So it's no wonder that I feel so strongly--everything that can be done to protect the purity of this place forever, should be done.

It is clear that BLM understands the severity of risks posed by mining to the Rainy River Watershed and downstream bodies of water—it's detailed in the Federal Register Notice (10/12/21): "...the Rainy River Watershed, the Boundary Waters Canoe Area Wilderness and the Boundary Waters Canoe Area Wilderness Mining Protection Area ... are threatened by potential sulfide mining." The Notice goes on: "Failure...could lead to irreversible degradation of this key water-based wilderness resource." I'm not sure what else I could add to that assessment.

Except, two facts about the ore potentially produced by Twin Metals clinch it for me--grade of metals extracted and ultimate market.

First, low grade ore produces increased waste. Twin Metals' average nickel grade is .19 percent, far below the 1.0 percent average considered "high" grade. Compare that to numbers from the Talon Mining's Tamarack project (also in Minnesota) as reported in the 9/15/21 issue of mining.com: 8 percent nickel and 12 percent copper. That means Talon could produce 162 percent more nickel annually than Twin Metals, while producing a tenth as much rock (2K tons per day vs 20K tpd).

Second, the ultimate market for this ore is not the U.S., but China. As there are no nickel smelters in the U.S., the nickel would be transported out of the country. Antofagasta (Chilean parent of Twin Metals), sends concentrates from its South American mines to China for smelting and refining. Further, Twin Metals' leases do not require the mining company to return refined metal to the U.S.

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The unavoidable risks of "irreversible degradation of this key water-based wilderness" simply cannot be equitably balanced with "benefits" that accrue to foreign interests. Sulfide mining in this rich, fragile and magical place has, well, no place. I fully support the withdrawal for 20 years—if not permanently.

Respectfully submitted,

A handwritten signature in cursive script, reading "Valoree Dowell". The signature is written in dark ink and is positioned below the phrase "Respectfully submitted,".

Valoree Dowell  
17600 Saint Croix Trail N  
Marine on Saint Croix, MN 55047