

1408 N 21st Ave E
Ely, MN 55731

F. David Radford
State Director of Geospatial Services
Bureau of Land Management, Eastern State Office
5275 Leesburg Pike
Falls Church, VA 22071

2021-12-02

Dear Mr. Radford:

We agree with the effort to prohibit exploration or siting of sulfide-ore precious metals mining on Federal lands within the Rainy/Lake-of-the-Woods Watershed. It is common knowledge that the fresh waters in this watershed are presently among the cleanest in the world.

This kind of mining, as you well know, is different from traditional iron mining in that it leaves behind/scatters unrecoverable amounts of metals from a sulfide matrix, metals which permanently contaminate the waters in and around these mining sites. Waters in this part of northeastern Minnesota, specifically in the Superior National Forest and the pristine Boundary Waters Canoe Area Wilderness (BWCAW), have little ability to buffer these toxic chemicals.

The Boundary Waters Canoe Area Wilderness and hundreds of thousands of acres on associated lands within the Superior National Forest allow unique and valuable tourism opportunities for visitors from around the world who traverse its lakes and portages by canoe, dogsled, skis, snowshoes, and other motorless and quiet means. The inevitable noise, commotion, and pollution of mineral drilling and extraction would not enhance any of these recreations – which contribute mightily to the economy of northern Minnesota.

It is well-understood that the job of protecting this watershed, its forests, geology, and abundant waterways, falls mainly to the Bureau of Land Management and the U.S. Forest Service, and to a lesser extent to the Canadian American International Joint Commission.

The small and temporary economic gain of allowing metallic metals exploration and resultant mining is not proportionate to the potential loss of natural features, tourism, and clean water.

This is particularly the case in a region endowed with an extraordinary amount of surface and ground water – in which the State of Minnesota, along with its regulatory agencies, over time, has allowed a goodly percentage of its rivers, creeks, ponds, lakes, and marshes to decline in quality to the extent that much of this water, particularly in south and central Minnesota, is neither swimmable, fishable, boatable, nor potable. In the northeastern part of the state, however, notwithstanding the careless promotion of ferrous mining and the relentless destruction of forests since the late Nineteenth Century, most of the waterways in the Rainy River/Lake of the Woods basin have remained clean, even to the point of potability in many lakes and rivers.

If it went ahead, the proposed Antofagasta/Twin Metals underground non-ferrous mining project on Birch Lake and the Kawishiwi River just upstream and proximate to the BWCAW, would leak toxic metal waste northward into the Rainy/Lake of the Woods basin in perpetuity. Any attempts to prevent or clean up the aftermath would be as much a fool's errand as it was during the Mount Polley disaster of 2014 in British Columbia.

We can still protect the unique wilderness of the Rainy/Lake of the Woods Watershed by withdrawing the United States portion permanently, or at least for 20 years from non-ferrous exploratory drilling and the environmentally dangerous commercial extraction that often follows such exploration.

Respectfully,


Ron and Judy Brodigan

