



range association  
of municipalities  
and schools

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January 12, 2022

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

*Submitted via email to [BLM\\_ES\\_Lands@blm.gov](mailto:BLM_ES_Lands@blm.gov) and mail*

Dear Deputy State Director Radford,

We write to you today to submit comments regarding the proposal to withdraw 225,000 acres of lands and minerals from future exploration and projects in northeast Minnesota. Our organization represents more than 78,000 residents and 60 public sector units of government, including 27 cities, 15 public school districts and 18 townships in the 13,000 square mile Taconite Assistance Area (TAA) of northeast Minnesota. As an organization, we have represented the interests of the Iron Range region for over 80 years. We are deeply concerned over the withdrawal of this land from any future potential development.

The future economic well-being of the Iron Range, as well as our nation's well-being, depends on minerals and mining, and we have an obligation to ensure that non-ferrous mining is done under the highest worker and environmental standards. We do not believe the generic study being proposed is better than studying a mine plan that is specific to a mine site. State and federal agencies have developed a robust environmental review and regulatory system through decades of work. This long-standing system of laws, rules and guidance provide clear and complete authority for state and federal agencies to thoroughly review and regulate or deny approval for any mining project in Minnesota to ensure it meets the standards in place. Every new mining project deserves to be evaluated individually and specific to their site, design and unique geology.

We firmly believe this recent federal action is just another delay tactic and is simply trying to avoid an environmental review process that has just begun for the Twin Metals Minnesota project. No project can begin construction or operations unless it successfully completes both federal and state environmental review processes and receives multiple permits from the DNR and other federal and state agencies that will impose restrictions on its construction and operation. Any mine plan must be adjusted to comply with those restrictions, and that is what we expect of mining companies proposing new projects in our region.

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***"One Range...One Voice"***

Congress, the Minnesota Legislature, state and federal government agencies, environmental groups, mining and exploration companies, and mineral owners have spent decades conducting the research, working on laws and regulations, and establishing the permitting processes to assure that development of copper, nickel, and other non-ferrous minerals in Minnesota will be managed responsibly. We should be respectful of the careful and exhaustive work that has gone into the establishment of these processes and rules.

Northeast Minnesota is the number one iron ore producer in the nation, and Minnesota's iron industry currently supports more than 4,000 workers with good, family-sustaining jobs. We are also blessed with the world's largest undeveloped copper-nickel deposit, called the Duluth Complex. The non-ferrous industry has the potential to support our families and communities for generations to come, as well as contribute to our state's strong educational system through the Permanent School Trust Fund. This fund supports 900,000 K-12 students across our state.

The Duluth Complex geologic formation in northeast Minnesota holds approximately 95% of U.S. nickel resources, 88% of its cobalt, 75% of platinum group metals and about a third of our nation's copper. Shutting off this domestic source of critical minerals is counterproductive to achieving our public policy initiatives. In fact, it should be our nation's goal that we mine these minerals the best way possible, using the most up to date science that exists, rather than importing them from countries with less stringent environmental and labor standards.

Permanently banning nonferrous mining within the Rainy River watershed – a watershed that has hosted multiple taconite mines, as well as multiple nonferrous mines that are currently operating on the Canadian side of the watershed, would strip our country of the ability to address some of our most pressing public policy priorities, including the fight against the climate crisis, securing our domestic supply chains, bolstering our national security, and creating American jobs. Minnesota has an opportunity to become a leader in addressing these issues because of our vast mineral resources.

Due to project-specific scientific records, modern technology, and global industry best practices, we believe non-ferrous mining can be done safely and responsibly while protecting the environment. We should all agree that non-ferrous mine proposals have the same chance as projects in any other industry to go through the established environmental review process and not be politicized. We have consistently requested legislative leaders and government officials to not slam the door on a project prematurely and against precedent established by law. We are asking for the same today.

Mining has sustained the Iron Range for more than 130 years, and we believe it is critical that we advance the non-ferrous mining industry in order to continue to sustain our region for generations to come. We have a responsibility to develop these resources in a safe and sustainable manner rather than continuing to rely on foreign sources to provide the materials our

nation needs. We ask you to rescind the proposal to withdraw 225,000 acres of lands and minerals from future exploration and projects in northeast Minnesota.

Respectfully,

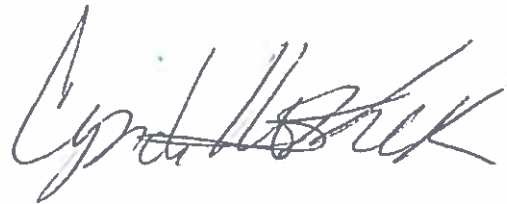


Ida Rukavina, Executive Director  
Range Association of Municipalities and Schools

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Nashwauk Keewatin School Board, ISD #319

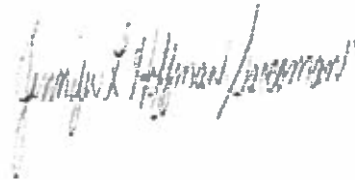


Pat Medure  
Grand Rapids School Board, ISD  
#318

/s/  
Phil Medure  
Great Scott Town Board



Stuart Lehman  
Buhl City Council



Jennifer Saccoman-Hoffman  
Hibbing City Council



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Jim Fisher  
McDavitt Town Board



Paul Kess  
Ely City Council



Shane Hoff  
Silver Bay City Council

/s/

Larry Pitts  
Calumet City Council



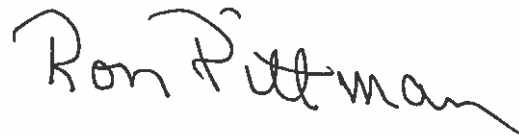
Dr. Noel Schmidt  
Supt, Rock Ridge, ISD #2909



Glenn Anderson  
Babbitt City Council



Bob Berrini  
Morse Town Board



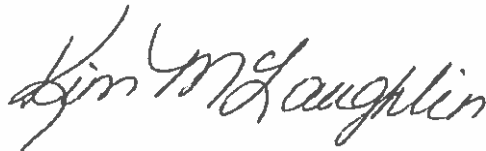
Ronald Pittman  
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/s/

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Chisholm City Council



Dale Adams  
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David Zins  
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Warren Stolp  
Nashwauk Town Board



Calvin Saari  
Mayor, City of Nashwauk

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