

December 8, 2019

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

Dear Mr. Radford:

I write regarding the Superior National Forest Withdrawal Application. I urge you to take action to protect the land in and adjacent to America's most visited wilderness - the Boundary Waters Canoe Area Wilderness - from the strong potential for environmental disaster posed by the proposed Twin Metals sulfide-ore copper mine. There is still time to stop this crash course with the prospect of irreversible devastation of our precious northern waters.

The Environmental Protection Agency has called sulfide mining "the most polluting industry in America." Well-documented mining failures in Canada and Brazil and elsewhere have led to devastation and even deaths although supposedly all safety and regulatory precautions were in place. It is impossible to clean up sulfuric acid once released, unlike the ability to vacuum oil from an ocean spill site.

Furthermore, federal law prohibits any degradation of the water quality in the Boundary Waters, as does Minnesota state law.

In 2017 the Minnesota Pollution Control Agency found the waters of the Rainy River Headwaters to be extremely clean and immaculate. It's because the upstream half of the watershed is so clean now, that the downstream waters of the Boundary Waters are so pure. It is well documented that all sulfide-ore copper mines degrade water quality, sometimes in the near term, and sometimes after decades.

Following are key points I urge you to consider:

1. The lakes, rivers, and streams of the Boundary Waters watershed are among the cleanest waters in North America and are especially sensitive to acids and heavy-metals found in copper mine pollution. The waters have little ability to buffer acid.
2. The Boundary Waters supports a strong, sustainable, growing outdoor recreation industry in Minnesota. It is a principal driver of the \$850 million, 17,000-job recreation economy in Northeastern Minnesota. It contributes to hundreds of manufacturing jobs, and it helps keep and attract talent to Minnesota. The only peer-reviewed and published


economic study showed that the region prospered with more jobs and more income if mining were banned.

3. The Boundary Waters' boreal forests make it a natural carbon sink - meaning that it absorbs more carbon from the atmosphere than it releases, thereby sequestering CO2 from the atmosphere and aiding in combating the climate crisis.

Nobody takes lightly the need for good jobs in northeastern Minnesota. However, the likelihood of permanent, irreversible danger to one of our state's most valuable assets negates the temporary benefit of creating a few hundred jobs with an expiration date. Furthermore thousands of existing jobs in tourism, real estate, outdoor learning, and recreational pursuits such as fishing and camping would be threatened should the watershed's pristine nature be defiled by sulfuric acid pollution. Frankly, a single accident could wreak both environmental and economic disaster.

As a Minnesotan, a citizen advocate for the natural environment, and someone who simply has enjoyed and benefitted from numerous canoe and camping trips to the Boundary Waters Canoe Area Wilderness, I beg you to stop the possibility of this non-ferrous mining operation in our region for the foreseeable future. This is a critical turning point for a unique federal wilderness area that means so much to so many people and to the ecology of our entire region.

Sincerely,



Kris Berggren

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