

January 7, 2022

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

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Dear Mr. Radford,

I am providing comments, concerning the Forest Service application to the Bureau of Land Management, to the withdrawal of northern Minnesota watersheds from further mining development.

My comments are as follows:

1. The whole point of a renewable energy is to reduce greenhouse gases by converting the US electrical grid to renewable energy sources. To accomplish that we will need a massive investment in that grid requiring a subsequent massive use of metals to build solar panels, wind turbines, transformers, transmissions lines, motors and most of all, storage batteries. Citizens of the United States can provide these metals through a highly regulated and socially advantageous process, or we can do it through an unregulated and socially deviant process. Minnesota has a very large reserve of the metals needed to rewire and repower this grid. Minnesota also has a very strict mining permit process as well as a regulated employee protection system.
2. The CNBC network has stated that China now has 80% of the raw mineral refining industry of the world. They also have 77% of the battery production of the world. They also own most of the solar panel manufacturing of the world too although I don't have that figure here. That is good for them but I don't think that is good for the United States nor good for the environment of the world. We all have heard of the lack of environmental regulation in China and its impact on the world's air and water.
3. The citizens of the United States want to have middle class jobs that can support families in ways that provide upward economic and social movement from generation to generation. We need to rebuild the supply chains within the United States and that starts with a natural resource, converted into meaningful metal that becomes a storage battery for an energy efficient car. The alternative is to allow other countries to provide the natural resource, the batteries and probably the car. The people of the United States can then press their noses up against the windows and websites of those automobile showrooms and admire the work done and technology provided by other countries of the world. Of course, the unregulated metallurgical processes from overseas would be a net larger producer of greenhouse gases and environmental degradation. We in the United States won't get the jobs but we will get the effects of the world's pollution.
4. Minnesota state agencies have been studying the mining and processing of gold, precious metals, copper and nickel ores for over 40 years. Now the Federal effort is to extend this by another 20 years. Is there anything to be studied for 20 years that is not already known after 40 years? The only things left to study are the specific technological means to be used in the mineral extraction process in order to protect the air and water. Shutting down this process again can only be deemed to be a political move and not based on scientific facts. The vast majority of people in northern Minnesota are in favor of mining these minerals in a socially and environmentally responsible way. Why the people in the small towns of northern Minnesota have to fight the California and New York well monied and politically connected environmental interests is confounding.

5. The 20-year freeze proposed by the Federal government is abusing the work that should be done by the permitting agencies of the state of Minnesota which is a science-based review of specific and detailed proposed plans and technologies. This land removal effort by the federal government is pulling all responsibility for permitting back to Washington where politics matter more than science. We have seen this scenario play out before (attempts to permit pipelines, paper mills and power plants).
6. I used to think that having the Boundary Waters Wilderness Area and the Voyageurs National Park in Minnesota was a good thing. I enjoyed my many trips into the BWCAW throughout my youth. However, over the last four decades I have come to believe this area has become a crushing burden on the people of northern Minnesota. The Federal government and its ongoing efforts to add land to government ownership and extend control over other land, has negatively impacted the economic prospects for the people of northern Minnesota.
7. I have seen for myself over the last 40 years how little tourism money adds to the area. The number of overnight stays in the BWCAW have shrunk over the decades while the Federal limits and controls around the areas have increased. The actual government statistics on overnight stays in the BWCAW reveals a telling story. The overnight stays in the BWCAW have dropped each year until 2020 (pandemic induced increase). From a 2007 study of this data, the visitors are mostly male (75%), mostly white (>97%), average age of 45 (compared to 26 when the area opened), mostly college grads (66%) and only 6% were new visitors. This data indicates that interest in visiting the area is dwindling. The annual overnight visits is not even one good day of attendance at the Minnesota State Fair. These stats do not bode well for future economic impact on northern Minnesota. I do want to preserve the BWCAW for future generations as it is a treasure, I just believe we can do that without putting a huge new exclusion zone around an already very large BWCAW.
8. Therefore, I oppose the Federal government making any blanket policies for any area outside of the BWCAW untethered to a particular project. To freeze development for 20 years no matter the science seems purely political.
9. The withdrawal would freeze new economic development in northern Minnesota for 20 years. It would force people that would have loved to live and work in northern Minnesota to go somewhere else to find middle class jobs. I have heard it clearly stated by the Minneapolis environmental leaders that they will remove local support for any and all projects "one funeral at a time". It is obvious that the idea of freezing activities for 20 years is a ploy to force people to relocate. This relocation would reduce the population, pro mining political influence would be greatly minimized, and the significant investments made in good faith by the mining industry would need to be written off as losses.
10. I am clearly opposed to any blanket policy removing mineral lands outside the Boundary Waters Canoe Area from mining development. We can mine these minerals safely, we can make the US a leader in the production of green energy products and provide for a middle class in northern Minnesota. Or we can let those in the Congo and China chart the future of our world.

Sincerely,



Jack Croswell  
8053 Galway Rd  
Woodbury, MN 55125