

The Honorable Ryan Zinke
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretaries Perdue and Zinke,

We, the undersigned conservation organizations write to express our grave concerns with the Department of Interior's recent action to reinstate expired minerals leases held by Antofagasta's Twin Metals Minnesota, and to request an immediate suspension of all mineral development authorizations in the Superior National Forest during the U.S. Forest Service's on-going study of a proposed mineral withdrawal on 234,328 acres of public lands within the Rainy River watershed and adjacent to the Boundary Waters Canoe Area Wilderness. A suspension of all authorizations related to mineral development should include a halt to any action on the applications to renew the two now reinstated mineral leases, and any permitting, leasing, or other approvals by either the Bureau of Land Management or the Forest Service.

As you are aware, the Forest Service study commenced on January 13, 2017, and began a two-year moratorium on new leasing activities. This study will be the basis for a decision by Secretary Zinke on the request by the Forest Service to withdraw from the federal mineral leasing program 234,328 acres of Superior National Forest lands for the maximum period of twenty years. Both Secretaries have voiced their support for the study. At a U.S. House hearing on May 25, 2017, Secretary Perdue responded to a question about the Forest Service study as follows: *"...your statement there regarding the two-year study over the sound science.... [W]e are absolutely allowing that to proceed."* Secretary Zinke responded to a similar question during an April 11, 2018 U.S. House hearing as follows: *"I agree that there are some areas that are too precious to mine."*

Even though the study will be completed by January 2019, the Department of Interior has moved aggressively to reinstate expired mineral leases within the very area being considered for a mineral withdrawal. This approach severely undercuts the study and violates the spirit of the two-year moratorium. It also disregards the Forest Service's significant concerns, expressed in both the agency's denial of consent to the renewal of the Twin Metals leases and in its application for the proposed withdrawal, that sulfide-ore mining is not an appropriate activity in the watershed of the Boundary Waters. It eliminates the public from involvement and goes against the will of 70% of Minnesotans. And it raises serious questions about the Department of Interior's willingness to protect our most cherished public lands and waters from the threats of industrial development and irremediable contamination.

The Boundary Waters is the most visited wilderness area in the country, spanning 1.1 million acres of interconnected waterways and forests in northeastern Minnesota. The Superior National Forest, which includes the Boundary Waters, contains 20 percent of all the freshwater in the 193 million-acre National

Forest System. Downstream from the Boundary Waters are Voyageurs National Park and Canada's Quetico Provincial Park.

These wild lands are an important part of the regional economy, and much of the economic infrastructure – businesses, resorts, lodges, outfitters, campgrounds, homes, Boundary Waters entry points, and more – is located in the Boundary Waters watershed, the area under review in the Forest Service study. Proposals to transform this area to a sulfide-ore copper mining district would displace local residents and many businesses, resulting in a potential loss of more than 27,000 jobs, \$1.4 billion in economic activity, and over \$500 million in lost property value in northeastern Minnesota.

Until the current Forest Service study, these and other environmental and socio-economic impacts of sulfide-ore mining in this area had never been studied or thoroughly vetted with the public. The National Environmental Policy Act (NEPA), which requires agencies to look before they leap, was passed in 1970, several years after the Twin Metals leases were first issued. By analyzing scientific data, consulting the public, and considering alternative courses of action, NEPA supports informed decision making – here, whether sulfide-ore mining in the Boundary Waters watershed is an appropriate activity.

We respectfully request that you allow appropriate space for that study to be completed in a rigorous, science-based, and transparent fashion. Reinstating 52-year-old leases in the middle of an on-going two-year study considering how that very action could harm the Boundary Waters Canoe Area Wilderness simply makes no sense. Thus, we ask that you suspend all additional mineral development authorizations on the segregated lands to allow the Forest Service to fully analyze the environmental, economic, and social impacts of sulfide-ore mining in this unique ecosystem and landscape. We look forward to your response.

Sincerely,

Undersigned Organizations