



January 20th, 2019

MN Hardrock Lease Renewal EA Project Manager
Northeastern State District Office
626 E. Wisconsin Ave., Ste. 200
Milwaukee, WI
53202

Re: Comments on DOI-BLM-Eastern States-0030-2018-0002-EA (Addition of Terms and Conditions for Renewal of Hardrock Leases, MNES 001352 and MNES 001353)

Dear Acting Secretary Bernhardt, Acting Director Steed, Eastern States Director Mouritsen, Northeastern States Director Gettinger, and Project Manager Strohl:

Founded in 1880, the American Canoe Association (ACA) is a national nonprofit organization serving the broader paddling public by providing education related to all aspects of paddling; stewardship support to help protect paddling environments; and sanctioning of programs and events to promote paddlesport competition, exploration, and recreation.

We are writing on behalf of over 30,000 paddlesports enthusiasts across the country, whitewater kayakers, canoeists, and stand-up paddleboarders, to express great concern with the Bureau of Land Management's (BLM) stated intent to renew two expired hardrock mineral leases in the headwaters of the Boundary Waters Canoe Area Wilderness (Boundary Waters).

The Boundary Waters is one of America's most iconic paddling landscapes, and America's most visited Wilderness area, 1.1 million acres of pristine water and unspoiled woodlands. This region is intimately linked to the heart and soul of the greater paddling community. There are few places in the world that rival the paddling experience of the Boundary Waters. It is not replaceable. The Boundary Waters, along with Superior National Forest, contains 20% of all freshwater in the entire National Forest system. The area supports and protects critical wildlife habitat, world-renowned recreational paddling experiences, and a \$913 million dollar tourism industry that supports 17,000 jobs.

Reinstating 52-year-old leases, that expired in 2016 after the U.S. Forest Service determined that the leases carried an unacceptable level of inherent risk that would



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expose the Boundary Waters to devastating impacts, is not acceptable. In addition, the 30-day public comment period on the Environmental Assessment (EA) released by the BLM on December 20th, 2018, is not an adequate time frame to comment on a document that is flawed, as it fails to address the full environmental impacts of sulfide-ore copper mining. Renewing these leases opens the door for a corridor of industrial development that will destroy water quality through leached sulfuric acids, and result in the loss of aquatic ecosystems, forests and biodiversity. In the history of sulfide-ore copper mining, pollution has never been avoided, and just one mine could pollute the Boundary Waters for centuries. All of this greatly comprises the integrity of the watershed, and the quality of the paddling experiences that are so deeply important to the paddling community.

We ask that you do not renew these leases. Please allow the Forest Service time to complete an EA that fully analyzes the environmental, economic, and social impacts of sulfide-ore mining in the Boundary Waters, provide an extension on the comment period to Monday, March 25th, and base all decisions on the best available science.

Sincerely,

Brett Mayer

Public Policy Chief
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