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Comments: May 17, 2024

Superior National Forest  
8901 Grand Avenue Place  
Duluth, MN 55808

Re: Comments on the BWCAW Forest Plan Amendment

Dear Forest Service:

On behalf of the 14,000 members of the Laborers' International Union of North America (LIUNA) Minnesota and North Dakota, I am writing to urge the U.S. Department of Agriculture's Forest Service (USFS) to maintain the Superior National Forest (SNF) as a multiple-use forest outside of the Boundary Waters Canoe Area Wilderness (BWCAW) and Mining Protection Area established by Congress.

LIUNA members live and work across Minnesota and appreciate and recognize the importance of our unique natural resources and environment to the well-being of their families and communities. On any given day, LIUNA members work on projects whose purpose is the protection and enhancement of our environment. Whether our members are replacing a section of sewer or pipeline; maintaining environmental controls at a mine or power plant; remediating asbestos, lead or hazardous waste; or managing stormwater on a building construction site, their objective is to protect our environment and ensure compliance with regulations.

SNF Wilderness Chapter amendments that would impact maintaining the SNF as a multiple-use forest outside of the BWCAW and Mining Protection Area established by Congress could have profound and negative effects on our members' careers, their families' livelihoods, and Minnesota's economy.

Job-creating projects in the SNF create thousands of family-supporting careers for Laborers and other building trades union members, in addition to community-supporting jobs at schools, hospitals, public and private sector employers. Specifically, mining is the largest and most direct source of employment for LIUNA members who live and work in Northern Minnesota, where we have been mining for more than 130 years. LIUNA members alone work approximately 850,000 job hours directly or indirectly on mining projects annually. Our members build mining facilities, expansions and rebuilds, mine infrastructure including roads, water infrastructure, and tailings ponds, and our members perform ongoing maintenance, including cleaning, demolition and general maintenance at the mines.

In addition, SNF Wilderness Chapter amendments that impact maintaining the SNF as a multiple-use forest outside of the BWCAW and Mining Protection Area established by Congress could have negative effects on our efforts to combat climate change and protect our national security.

One of the most important contributions Minnesota can make to the fight against climate change is leading the world in the safe and responsible mining of copper, nickel and other precious metals. Today, most precious metals are mined in countries without strong labor or environmental protections. Northern Minnesota is home to one of the largest undeveloped mineral deposits in the world, containing more than four billion tons of copper, nickel and precious metals. The Duluth Complex holds the world's second largest copper deposit (34% of U.S. resource) and the world's third largest nickel deposit (95% of U.S. resource), in addition to cobalt, platinum, palladium, manganese, silver, titanium, gold and vanadium.

Mining these minerals in the United States and reducing our dependence on foreign sources of these materials is vital for bolstering our national security efforts. The Biden Administration's own supply chain assessment released in February 2022 found that "over-reliance on foreign sources and adversarial nations for critical minerals and materials posed national and economic security threats." Taking Northern Minnesota's critical minerals off the table for development will make America less secure.

LIUNA acknowledges the need for the USFS to review the status of the BWCAW management area within the SNF to better position the Forest to restore and preserve wilderness character and meet purposes of wilderness described in the 1964 Wilderness Act and 1978 BWCAW Act. We agree the BWCAW deserves special protections provided under current law, which bans non-ferrous mining in the BWCAW and the surrounding buffer zone. Outside these protected borders and consistent with the 2004 SNF Plan, environmentally responsible mineral exploration, development, and production remain desired conditions to support economic growth and national security (D-MN-1 and D-MN-2).

We urge you to continue the federal government's role in supporting orderly and economic development of domestic mineral resources to satisfy industrial, security and environmental needs and to maintain the SNF as a multiple-use forest outside of the BWCAW and Mining Protection Area established by Congress.

Thank you for your consideration.

Respectfully,

Joel Smith  
President and Business Manager