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# AGC of Minnesota

Aug. 7, 2017

Connie Cummins, Forest Supervisor  
U.S. Forest Service – Superior National Forest  
Attn: Mineral Withdrawal  
8901 Grand Avenue Place  
Duluth, MN 55808

Submitted via e-mail: to [comments-eastern-superior@fs.fed.us](mailto:comments-eastern-superior@fs.fed.us).

Dear Ms. Cummins:

On behalf of the Associated General Contractors of Minnesota (AGC), I am submitting formal comments in opposition to the U.S. Forest Service's (USFS) proposed withdrawal of 235,000 acres of federal land and minerals within the Superior National Forest in northeast Minnesota from future mineral exploration and potential development.

The AGC is a non-profit professional trade association that is dedicated to promoting opportunity and excellence in the building and highway construction industry throughout the State of Minnesota. AGC focuses on the highway and building sectors of the market including heavy and municipal utility construction. Members include General Contractors, Specialty Contractors, and Affiliated businesses that have a vested interest in these industries. AGC operates as a centralized point of focus for information dissemination, education and training, and for leadership on important industry related issues. It also provides leadership to promote and maintain a favorable business climate for its members.

AGC of MN has several members who work directly with the mining operations in northern Minnesota. Withdrawing this land and its valuable resources will continue to make it difficult for a necessary component of Minnesota's economy to grow jobs.

AGC urges the USFS and U.S. Bureau of Land Management (BLM) to immediately rescind the ill-advised withdrawal proposal and allow current and future mining project proposals to be evaluated under established project-specific environmental review processes embodied in the National Environmental Policy Act (NEPA) and related state and federal environmental laws and regulations. However, should the USFS and BLM choose to continue to pursue the withdrawal action and the required Environmental Impact Statement (EIS), the EIS should take into consideration the following issues:

- Removing lands and minerals from future mining projects will cause the State of Minnesota to lose thousands of potential jobs, billions of dollars in future investment and billions of dollars in potential revenues that



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support the state's K-12 education system. The EIS should clearly document these adverse economic impacts and address the means by which the federal agencies intend to mitigate the inevitable harm caused to the long-term economic health of the region and the state.

- Under NEPA, the federal government has well-established processes in place for conducting environmental review on mining projects on a project-specific using detailed project designs and site-specific data. Under these processes, projects are only approved for construction and operation if they can meet strict state and federal environmental standards. Because these processes are rigorously applied to project-specific proposals, they are superior to the withdrawal proposal in analyzing environmental impacts and protecting environmental resources. The EIS should demonstrate why the proposed mineral withdrawal is needed when existing laws and environmental review processes are more effective in protecting environmental resources.
- The region of Northeastern Minnesota has the largest known undeveloped deposit of strategic metals in the world. With the growing U.S. demand for strategic metals like copper and nickel, and the growing dependence of foreign sources, the EIS should study the impact to the economic security of the U.S., and in particular the potential adverse impacts to the U.S. construction and manufacturing sectors, in denying the mining of these resources within the proposed withdrawal area.

Thank you for your consideration of these important issues.

Sincerely,

Tim Worke, CEO