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*Voyageurs National Park Association's mission is to connect people to Voyageurs National Park, enhance the visitor experience, and protect the park for present and future generations.*

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Constance Cummins  
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**Re: Northern Minnesota Federal Minerals Withdrawal EIS/Scoping Comments of Voyageurs National Park Association**

Dear Ms. Cummins:

Thank you for the opportunity to comment on the U.S. Forest Service request for withdrawal of 234,328 acres of Federal Land within the Rainy River watershed on the Superior National Forest, for a 20-year period.

Voyageurs National Park is a place of scenic landscapes and waterways, and is rich in human history. Located in northern Minnesota and sharing 55 miles of international border with Canada, the park's 218,000 acres is part of a larger ecosystem that includes the Superior National Forest, Boundary Waters Canoe Area Wilderness and Quetico Provincial Park. The purpose of Voyageurs National Park is to preserve, for the inspiration and enjoyment of present and future generations, the outstanding scenery and geology, biological diversity, and cultures, within its vast interconnected waterways that shaped the historic fur trade in North America.

Voyageurs National Park Association (VNPA) is a 501c3 nonprofit organization headquartered in Minneapolis, Minnesota. VNPA's mission is to connect people to Voyageurs National Park, enhance the visitor experience, and protect the park for present and future generations. Representing a community of Minnesotans and park visitors who care about the future of Voyageurs National Park, VNPA works to protect the park through advocacy and conservation initiatives, and to connect more people to the park through education, stewardship, and outreach efforts.

We appreciate the Forest Service's consideration of our comments on this and other projects. Please note that VNPA is also a signatory on more extensive comments that will be submitted by the Campaign to Save the Boundary Waters (Northeastern Minnesotans for Wilderness).

Voyageurs National Park is located within the Rainy River watershed. We are supportive of the Forest Service request for withdrawal of Federal acres to protect lands located in the Rainy River Watershed from the potential adverse environmental impacts arising from exploration and development of minerals. Regarding the SDEIS being developed in conjunction with the request for mineral withdrawal, VNPA is requesting that the environmental analysis include the following potential impact topics which are of paramount concern to Voyageurs National Park:

**Recreational resources:** The vast and complex system of interconnected waterways in the watershed provide fishing, boating, canoeing, camping, water-based tourism, ecotourism, shoreline property ownership and a multitude of summer and winter outdoor recreational activities. The park is recognized for its exceptional fishing opportunities. Creel surveys indicate over 700,000 hours of angling per year.

**Economic resources:** A National Park Service (NPS) report shows that 238,313 visitors to Voyageurs National Park in 2015 spent over \$18 million in communities near the park. That spending supported 301 jobs in the local area. The peer-reviewed visitor spending analysis was conducted by the U.S. Geological Survey and National Park Service. The report shows \$16.9 billion of direct spending by 307.2 million park visitors in communities within 60 miles of a national park. This spending supported 295,000 jobs nationally; 252,000 of those jobs are found in these gateway communities. The cumulative benefit to the U.S. economy was \$32 billion.

**Aquatic ecosystem:** Approximately 40% of the total area of Voyageurs consists of aquatic habitats. The State of Minnesota designated all waters within the park as Outstanding Resource Value Waters and designated some as Lakes of Biological Significance. Due to the park's size and location in the drainage basin, aquatic resources within Voyageurs are particularly susceptible to activities and developments that occur outside its boundaries. Mercury concentrations in fish and fish-eating wildlife in Voyageurs are high and pose health risks to humans. Mercury concentrations in some fish in Voyageurs are already above thresholds shown to affect fish reproduction. It remains one of the most serious and scientifically challenging threats to the park and nation's aquatic resources.

**Air quality:** Voyageurs National Park is designated as one of these Class I areas along with the Boundary Waters Canoe Area Wilderness (BWCAW) - the only Class I sites in Minnesota. One of the purposes for which Voyageurs was established is the outstanding scenery. Spectacular scenic views are key to visitor enjoyment and experience. Voyageurs showcases some of the darkest night skies in the continental United States. Wetlands, wildlife, vegetation, and surface water in Voyageurs are susceptible to airborne pollutants as well. In addition, Voyageurs is considered to be at very high risk from acidic deposition.

**Landscape/ecosystem:** The park's extensive lake networks are surrounded by heavily forested and relatively undeveloped lands which support abundant flora, fauna, and wildlife indigenous to and identified with the North Woods. Dozens of species currently have state or federal protection, including species like the Canada lynx and northern long-eared bats. Land use and land cover are identified by the National Park Service as a key Vital Sign in Voyageur. Potential changes to the structure of the landscape and abundance of forest and woodland communities in the land withdrawal area could have impacts on vertebrates, especially birds, moose, wolves, lynx, bats in Voyageurs. The richness of birds and mammals and chance to see wildlife are some of the reasons that visitors come to the park. Audubon has designated the region as an Important Bird Area, due in part to the high abundance of water-loving bird species such as loons and eagles.

**Exotic species:** Human manipulation of the landscape and increased risk of accidental introduction of exotic species to the region.

**Cultural resources:** There are 18 Indian tribes affiliated with Voyageurs National Park. The Ojibwe/First Nations history and use of the area where the project is located is connected with the Ojibwe history and use of the area now included in Voyageurs National Park. Traditional cultural properties (including trail systems, geographic features, sites) identified in the land withdrawal likely have cultural and historical significance to the entire region and may be critical to maintaining Aboriginal cultural identity.

**Cumulative impacts:** A vigorous cumulative impact analysis is necessary for understanding any change in the broad array of resources and ecosystem components and for preventing cascading environmental impacts in the watershed.

Thank you for considering these impact topics in your environmental analysis. We would be happy to provide further information regarding the resources that we are seeking to protect.

Respectfully submitted,



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