

From: DeGross, Bob <bob_degross@nps.gov>
Sent: Friday, March 31, 2017 2:32 PM
To: MN_MM Lease Sale (DNR)
Cc: Kalstad, Dixie; Riddle, Heidi; Mary Graves
Subject: NPS Comments to MN Div of Lands and Minerals related to potential leases in vicinity of Rainy Lake Watershed

Please accept the following as an electronic version of a letter to be followed by a hardcopy of the same. As the new Superintendent of Voyageurs National Park I look forward to being advised of any future developments related to these proposed State leases so that NPS staff might be able to provide recommendations for avoidance and/or mitigation of any potential impacts associated with the waters, lands and other resources of the national park.

Bob DeGross

March 31, 2017

Mr. Jess Richards, Director
Division of Lands and Minerals
Box 45
500 Lafayette Road
St. Paul, MN 55155-4045

Dear Mr. Richards:

The National Park Service (NPS) appreciates the opportunity to comment on the Minnesota Department of Natural Resources sale of metallic minerals exploration and mining leases. Approximately 195,324 state-owned mineral acres are being considered for lease in five counties. The areas under consideration contain lands in portions of Beltrami, Itasca, Koochiching, Lake of the Woods, and St. Louis Counties.

Voyageurs National Park (NP) is a place of scenic landscapes and waterways, and is rich in human history. Located in sparsely populated 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 Boundary Waters Canoe Area Wilderness (BWCA) and Quetico Provincial Park. Voyageurs NP was legislated by Congress in 1971 and established in 1975 to preserve, for the inspiration and enjoyment of present and future generations, that outstanding scenery, geological conditions, and water system which constituted a part of that historic route of the Voyageurs who contributed significantly to the opening of the Northwestern United States. The park contains waters that are designated by the State of Minnesota as Outstanding Resource Value Waters, for which new or expanded discharges to these waters are prohibited.

The NPS is required by the Organic Act of 1916 to "...to conserve the scenery and the natural and historic objects and wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." [1] The term "impairment" is an important legal term that is explained in the NPS's Management Policies 2006. According to Management Policies 2006, park managers are expressly prohibited from allowing for the "impairment" of park resources and values unless "...directly and specifically provided for by legislation or by the proclamation establishing the

park.” [2]

Importantly, Management Policies 2006 state that impairment can “result from sources or activities outside the park” and is an impact:

"...that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts." [3]

The DNR’s “Land Use Screening Criteria for Public Non-Ferrous Metallic Minerals Lease Sales Post 2013”, identifies certain lands or features are excluded from leasing by law or by established procedures. According to this document, no lands or water areas within the BWCA and Voyageurs NP will be offered for leasing. However, it also states that “some of the exclusion features (e.g., beds of public waters) may be included in a negotiated lease”. Exploration and mining activities, even outside the immediate vicinity of Voyageurs National Park, may have impacts to park resources, including water quality and quantity, air quality, wildlife, dark night skies, natural soundscapes, cultural resources, scenic views, soils, geologic and hydrologic processes, and visitor experiences .

If these proposed State lands are leased for potential development, we respectfully request that we be notified of leases that may impact the Rainey Lake Watershed, the lands and features near Voyageurs NP, so that the National Park Service might provide recommendations for avoidance and/or mitigation of these impacts, in accordance with the Organic Act and NPS policies.

Thank you for considering our comments about this sale of metallic minerals exploration and mining leases. Through early communication and coordination, especially prior to any surface disturbance, we can provide for minerals development while still protecting the park’s irreplaceable resources.

Sincerely,

Robert DeGross
Superintendent
Voyageurs National Park

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Voyageurs National Park preserves the outstanding scenery, geology, biological diversity, and cultural resources within its vast interconnected waterways that shaped the historic fur trade in North America. It's preserved for the inspiration and enjoyment of present and future generations.

"Without love of the land, conservation lacks meaning or purpose, for only in a deep and inherent feeling for the land can there be dedication in preserving it."

-- Sigurd F. Olson