

Comments on the Kawishiwi Buildings Disposition Environmental Assessment

An environmental impact statement is needed to explain the following:

- How the major indirect impact to wildlife (summary) would be mitigated if the proposed alternative (building demolition) is chosen.
- Where continued wildlife studies of this kind would take place in the future. Over 375 scientific papers have been published by scientists using the Kawishiwi Lab. Other available sites and their services need to be listed.
- What alternative sources of funding are available for maintenance of historic buildings.
- What possibilities are available for outside entities to take over management of the site.
- Economic analysis of money being spent on maintaining the Kawishiwi site within the context of the Northeast/Midwest region that the research lab is serving.
- An analysis of research needs within the Northeast/Midwest and the role that the Northern Research Station/Kawishiwi Lab plays within this 20 state region.
- Ways to find donors to cover the \$25,000 holding fee that the Northern Research Lab takes out of research funds, but that cannot be used for maintenance.
- Why the buildings constructed by the Civilian Conservation Corps in the 1930's are verified as eligible for the National Registry of Historic Places, but not listed.
- An explanation for why the USFS is no longer using the buildings for experimental forestry or forestry management research.
- Analysis of the impact of Kawishiwi building demolition upon the historical heritage of the area, and as part of the history of Superior National Forest, which can be traced back to the establishment of the Halfway Ranger District in 1910.
- The needs and concerns of local citizens and agencies that currently use the facilities for wildlife research purposes must be adequately addressed and mitigated.

The scoping document does not contain maps showing mining exploration as affecting the Kawishiwi Laboratory area. According to news releases issued on July 21, 2010, Duluth Metals has signed a partnership with international copper mining company Antofagasta, including \$130 million for a feasibility study. This 3 year study could be followed by an EIS and mining permits.

If this mining venture were to go through environmental assessment, the historic Kawishiwi buildings would obviously need to be inventoried and removed. Their presence on the land would create a complication for the sale/land exchange of that land by the USFS to Duluth Metals. The Kawishiwi Buildings Disposition, though stated as a money saving project, is in fact a connected action in anticipation of mining permitting.

This would explain why the Proposed Alternative would go through the expense of building demolition rather than allowing the buildings to deteriorate. Building demolition (or removal, which would also require some disturbance of the land), would then make that land less desirable as USFS property, thus opening the way for mining destruction. Once land is earmarked as altered and bears the scars of bulldozers and large equipment, it is just one more step to accept further destruction of that land.

This act of Kawishiwi building demolition ahead of mining goes against USFS policy dating back to 1891, when forest reserves were established to protect timber and hydrological resources. It is not the mission of the USFS to anticipate mining operations as accomplished fact, and in fact, by doing so, the USFS is acting contrary to NEPA law.

If the purpose of the Kawishiwi Buildings Disposition environmental process is strictly a money saving effort, then an EIS must address the historical value and significance of the Kawishiwi research center in a way that preserves both the integrity of the buildings and the record of wildlife studies that have benefited and continue to benefit Superior National Forest and the Boundary Waters Canoe Area Wilderness.