

March 19, 2025

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Re: Please Oppose and Table or Amend SF 2530

Dear Senators and Chair Hawj, Vice Chair McEwen:

Northeastern Minnesotans for Wilderness (“NMW”) is the founder and leader of the campaign called Save the Boundary Waters. We have 132,461 distinct Minnesota supporters and donors as of today, with whom we communicate about risks to and strategies to protect Minnesota’s canoe country, i.e., the Boundary Waters Canoe Area Wilderness (“Boundary Waters”), its watershed, Voyageurs National Park, and the larger Quetico-Superior ecosystem.

Senate File 2530 as drafted is a dangerous bill that would permit permanent drilling and extractive industry development in a rush before more the careful consideration in State rulemaking for permanent rules has even gotten underway. The bill would tie the hands of the Minnesota DNR by denying it the latitude to deny drilling permits and heavy infrastructure development in sensitive areas within northeastern Minnesota – an area of the state documented by the Minnesota Biological Survey to be disproportionately rich in extremely high-quality natural habitats including pristine waterways and examples of sensitive ecosystems, not to mention the highest quality dark sky resources, quiet high-quality wilderness character, and opportunities for solitude in scenic settings found nowhere else in Minnesota. Senate File 2530 in its present form threatens these natural resources and the wilderness character of the Boundary Waters and the surrounding region. For this reason, we ask you to oppose the bill and to table it, unless it is satisfactorily amended to address NMW’s concerns.

In addition to natural resources and wilderness character concerns, we are compelled to note that the Boundary Waters and surrounding Superior National Forest are the principal drivers of the amenity-based economy of northeastern Minnesota. Damage to Boundary Waters the natural resources and wilderness character and to the Superior National Forest IS damaging to the diverse amenity-based economy of the Boundary Waters’ gateway communities. That economy includes thousands of recreation and service industry jobs that together employ more people and produce vastly more personal income than organized resource extraction (see the attached peer-reviewed economic journal article by Bradt & Stock). The Boundary Waters attracts and keeps residents, income, and spending in the region, and those residents and their spending employ people in construction and professional trades, including realtors, doctors, accountants, bankers,

lawyers, and all of the other professions that are to be found in a diversified economy. All of these professions and professionals, including the recreation and service workers of the region, are important, honorable, and critical to the lives and economic activity of households in the region.

NMW is aware of and agrees with the comments on SF 2530 found in MCEA's letter. To the MCEA comments, NMW adds these critical observations on SF 2530:

1. The bill unwisely ties the DNR Commissioner's hands by requiring issuance of permits near and under, including by directional boring underneath, many areas that are extremely sensitive and worthy of continued protection. Because this bill would mandate permits in a range of areas, it removes important discretion of the DNR to deny permits to protect natural resources belonging to and protected by all the people of Minnesota and the United States.
2. Of utmost concern, by authorizing passive extraction of resources from lands immediately around and inside the Boundary Waters Canoe Area Wilderness, including by directionally boring within the 1/4-mile Mineral Management Corridor around the Boundary Waters, the bill incentivizes drilling and gas infrastructure development all around the Boundary Waters Canoe Area Wilderness. **This fault is more than enough, by itself, for the bill to be unworthy of passage in present form, and for it to be tabled - even if all other faults found with the bill were to be satisfactorily addressed.** Keep foremost in your minds that although this industry of drilling for, and pipelining, and processing non-BTU gas is an entirely new industry to Minnesota, some of the techniques being used have led to well-documented instances of groundwater and surface water contamination elsewhere in the state, including by loss of integrity of the wells and directional borings being developed. The Boundary Waters and Superior National Forest geology is well-known to host very large number of faults, and fractures and joint-sets, especially within fractured bedrock zone (top 300-400 feet below ground surface), and water flows preferentially through these. Drilling fluid has been suddenly lost in some well, meaning that it has intersected voids and fractures. Moreover, drilling fluid additives are treated by DNR as proprietary business information, which keeps the public from knowing what chemicals are being introduced to the groundwater.
3. The bill provides no ceiling on the quantity or duration of drilling and gas infrastructure development within earshot of the Boundary Waters at time when the Minnesota DNR has admitted that the state's existing noise rules are not protective of wilderness values and character.¹ The bill cites those inadequate existing state noise

¹ DNR's Finding of Fact, Conclusions of Law, and Order on Remand dated May 31, 2023 and filed in Ramsey County District Court, Second Judicial District in *Northeastern Minnesotans for Wilderness v. Minnesota Department of Natural Resources*. See, e.g., Finding of Fact No. 369: "[T]he BWCAW is a national wilderness area and has been given federal protections to protect these wilderness characteristics. **Existing State noise regulations are not protective of a wilderness setting like the BWCAW, and light pollution is not regulated. DNR has concluded the current setback distance for surface disturbance should be increased through rulemaking to better account for potential land use conflicts and environmental nuisance condition impacts to the BWCAW** such as light impacts and noise from blasting and mining operations."

rules and standards which the State DNR itself has announced in court-filed documents to be inadequate. Furthermore, the noise produced by the type of drilling rig required for non-BTU gas well development is different from the noise produced by hardrock drilling rigs used for mineral exploration with which Minnesota is more familiar. There has so far been no analysis of the damage that this bill would allow to occur to the wilderness character of the Boundary Waters, the crown jewel of Minnesota's most prized and beloved public lands.

NMW and others have many concerns with this bill, which seeks to rush extractive industry development forward even before rulemaking has provided a considered set of rules by which this new industry – the non-BTU gas extraction, processing & commercialization industry – should be required to comply. The temporary scheme provided for in SF 2530 is vastly out of balance, and would incentivize immediate development of wells, pipelines, and processing facilities including first and foremost in the wildest, most sensitive, and pristine portion of Minnesota. **We urge you to oppose and table the bill. Alternatively, then in addition to changes to address problems identified by MCEA, the bill should not be brought to a final vote in committee until amendments can be drafted and passed to accomplish the following:**

A. Assert and ensure that, notwithstanding any other provision in the bill, no approvals or permits shall be issued by the state agencies or any subdivision of the state for any aspect of, or action connected to or intended to promote non-BTU gas development that would degrade natural resources or the wilderness character of the Boundary Waters Canoe Area Wilderness or Voyageurs National Park, including any aspect of wilderness character or park character, such as dark sky resources, quietude, opportunities for solitude, and the natural sounds to be heard there.

B. Bar the development of non-BTU gas wells and directional borings, pipelines, and processing and staging facilities on all lands north of Township 60 in the Counties of Lake and Cook, State of Minnesota, including the natural shorelines of Lake Superior within such area, and north of Township 63 in St. Louis County, State of Minnesota. This area corresponds to the protected area designated by Congress on July 10, 1930 under 16 U.S.C. §577, also known as the Shipstead-Newton-Nolan Act and its corresponding 1933 Minnesota state law equivalent, the Little Shipstead-Newton-Nolan Act.

Thank you for the opportunity to comment. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ingrid Lyons', with a stylized, flowing script.

Ingrid Lyons
Executive Director
Northeastern Minnesotans for Wilderness &
Save the Boundary Waters



Analysis

Analysis of proposed 20-year mineral leasing withdrawal in Superior National Forest[☆]James H. Stock^{a,b,*}, Jacob T. Bradt^{b,1}^a Department of Economics, Harvard University, United States of America^b Harvard Kennedy School, Harvard University, United States of America

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ABSTRACT

The Rainy River Watershed on the Superior National Forest is home to the Boundary Waters Canoe Area Wilderness (BWCAW). It also contains deposits of copper, nickel, and trace metals, and copper-nickel mining has been proposed adjacent to and upstream of the BWCAW. In 2017, the US Department of Agriculture proposed withdrawing land in the Rainy River Watershed within the Superior National Forest from mineral leasing, a position it reversed in 2018. These developments highlight the potential tradeoff between economic benefits from mining and concerns about its negative economic consequences for the local recreational and amenity-based economy. Previous studies of mining in the Superior National Forest focus on static effects on a single industry (e.g., mining) at some unspecified point over a medium-run horizon. We draw on these studies and the economics literature to provide a unified analysis of the effect of the proposed mining development on income and employment over time. Our results suggest that the proposed mining would lead to a boom-bust cycle that is typical of resource extraction economies, exacerbated by the likely negative effect on the recreation industry.

1. Introduction

The Boundary Waters Canoe Area Wilderness (BWCAW), located within the Superior National Forest in northeastern Minnesota along the Canadian border, consists of more than one million acres of connected lakes and rivers. The BWCAW is one of the most visited wilderness areas in the United States, with 150,000 visitors in 2015 (US Forest Service, 2016). Those visitors support a varied outdoor

recreation industry in gateway communities, primarily Ely, Minnesota (Hjerpe, 2018). The lakes and rivers outside the BWCAW also attract recreational visits and both seasonal and permanent residents who locate there for the outdoor and lakes amenities.

The region also has rich mineral deposits. The Mesabi Iron Range, the largest iron mining district in North America, extends for nearly 100 miles to the southwest of the BWCAW, with its most northeasterly portion within ten miles of the wilderness boundary (Minnesota

[☆] An earlier draft of this study was submitted on August 6, 2018, in letter form, as a comment on the U.S. Forest Service's proposed withdrawal of Superior National Forest land within the Rainy River Watershed from mineral leasing. This revision reflects several updates to the 2018 letter. The most significant of these is that the 2018 letter considered only direct and indirect employment and income. In response to comments received on the original letter, the current revision now includes estimates of induced (spillover) employment and income. This revision also incorporates several other changes. For internal consistency, multipliers are now taken solely from University of Minnesota-Duluth, (2012) for mining and from Hjerpe (2018) for recreation. Additionally, wage rates are all for the Arrowhead county region whereas, in the 2018 letter, some wage rates were statewide. The discussion of related academic literature has been expanded, and procedural recommendations to the US Forest Service made in the 2018 letter have been removed from this version. Taken together, the revisions affect numerical values in the 2018 letter but do not change the conclusions. We thank Steve Polasky, Cathy Kling, John Hinderaker, Tom Landwehr, and two referees for their comments.

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¹ Stock is Professor of Economics, Department of Economics, Harvard University. Bradt is a PhD student at the Harvard Kennedy School. Neither author received compensation for this analysis, nor has any financial interest in this matter, nor has engaged in paid consulting or paid expert testimony in this matter, nor has any other financial conflict of interest in this matter.

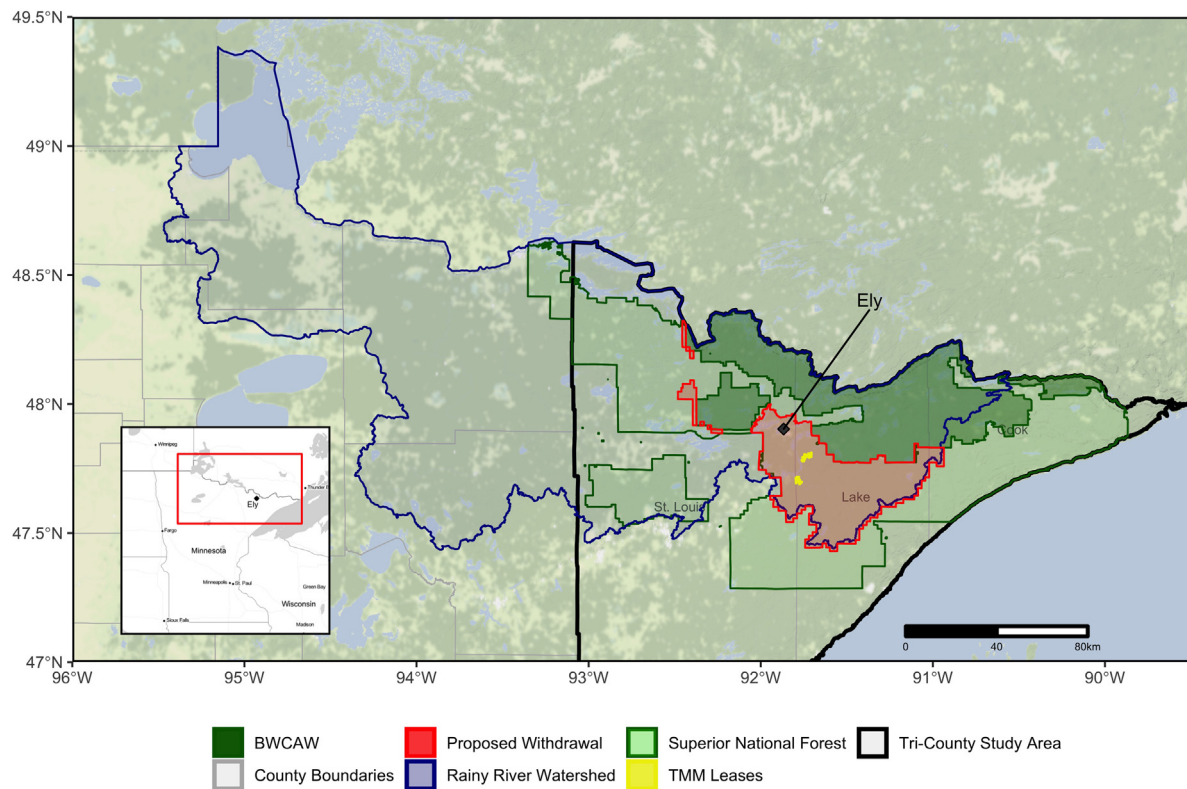


Fig. 1. Map of key hydrological and administrative features of the study area. The area of the proposed withdrawal of mineral rights within the Superior National Forest drains north into the BWCAW and encompasses the TMM mineral leases.
Sources: U.S. Forest Service, 2017, Minnesota Geospatial Information Office, 2020.

Department of Natural Resources, 2017). Although its high-grade iron ore (hematite) has been mined out, taconite mining continues, and taconite mining operations employed 3440 workers in 2016 (Minnesota Department of Natural Resources, 2017). In addition, there is commercial interest in developing copper-nickel mines in deposits both in and out of the Superior National Forest.

In particular, a copper-nickel mine, the proposed Twin Metals Mine (TMM), would be located in a site bordering and immediately upstream of the BWCAW (see Fig. 1).² The legal and jurisdictional setting is complex. The proposed site, along with much of the copper-nickel deposit, is on federal land for which mineral leasing rights are administered by the Bureau of Land Management (BLM), though the project also includes several state leases administered by the Minnesota Department of Natural Resources (DNR). The land is within the Superior National Forest, the surface of which is administered by the U.S. Department of Agriculture (USDA), and the USDA must consent to discretionary mineral leasing to ensure compatibility with the resource management objectives of the National Forest System. The USDA also administers the BWCAW, where federal law prohibits mining. Federal mining rights for the TMM project were originally granted in 1966 for a 20-year period with up to three 10-year renewals. The first two of these renewals were granted by the federal government. However, in December 2016 the USDA withheld its consent to renewal, citing concerns

about negative impacts on the BWCAW, so the BLM denied the third renewal request.³ In January 2017 under the Obama Administration, the U.S. Forest Service further proposed to withdraw from mineral leasing approximately 234,000 acres of federal lands within the Rainy River Watershed, which flows north into the BWCAW and which contains the TMM project, and it also initiated the preparation of an environmental impact statement (EIS) to assess the proposed withdrawal.⁴

In September 2018, the Trump Administration cancelled the withdrawal application and EIS,⁵ and in May 2019 the BLM reversed its 2016 denial and renewed the TMM leases. TMM submitted its mine application to regulatory agencies in December 2019. The mine now awaits federal and state permitting, even as the federal lease renewal is currently being litigated.⁶ Despite its cancellation, the proposed withdrawal remains a key part of the debate over mining near the BWCAW, and legislation that would permanently enact the Obama

³ Thomas Tidwell, Chief, BLM, Memorandum "Lease Renewal Application Rejected," December 15, 2016 at <https://www.blm.gov/download/file/fid/7652>.

⁴ 82 FR 4282.

⁵ <https://www.usda.gov/media/press-releases/2018/09/06/usda-removes-roadblock-mineral-exploration-rainy-river-watershed>.

⁶ The TMM project is subject to multiple regulatory requirements. The project is subject to an environmental review process under the National Environmental Policy Act (NEPA) and Minnesota Environmental Policy Act (MEPA). In December 2019, TMM submitted its Mining Plan of Operations to state and federal agencies for review, thereby initiating the formal NEPA/MEPA Environmental Impact Statement process (TMM, 2019c) (see <https://www.dnr.state.mn.us/input/environmentalreview/twinmetals/index.html>). Following completion of the EIS, the TMM project must receive permits by various federal, state, and local regulatory agencies to commence construction and operation. These permitting requirements regulate various aspects of the project construction and operation, including hazardous waste management, the disposal of wastewater, and maintenance of air quality standards (TMM, 2019b).

² The Twin Metals Mine is a copper-nickel mine proposed by Twin Metals Minnesota, a subsidiary of Antofagasta PLC, one of the top ten copper producers by volume in the world. The project is located approximately nine miles southeast of the city of Ely, MN and proposes to mine sulfide-ore from the Maturi deposit of the Duluth Complex geologic formation. The Duluth Complex is one of the world's largest polymetallic deposits and in addition to copper and nickel includes cobalt and platinum group metals. Twin Metals Minnesota anticipates processing 20,000 tons of ore per day from the proposed sub-surface mining operation at the Twin Metals Mine (TMM, 2019a).

Administration's withdrawal has been introduced in the House of Representatives.⁷

The proposed TMM mine raises a classic conflict between recreational use and conservation on the one hand and mining development on the other, a conflict made more stark by the unique attributes and wilderness status of the BWCAW. Proponents of the mine point to the jobs and income it will create (University of Minnesota-Duluth, 2012; Orr et al., 2018). Opponents point to the risks to the watershed because of potential acid mine drainage and toxin release (Myers, 2016; Pearson et al., 2019), noise and light pollution that would disrupt the wilderness experience and negatively impact the local recreational industry (US Forest Service, 2016), and potential reductions in amenity-based in-migration (Sungur et al., 2014).⁸

The environmental risks associated with sulfide-ore copper mining within the watershed of the BWCAW are potentially economically consequential. Mining and beneficiation processes for underground copper ore generate large volumes of tailings. In a watershed hydrology model of possible mining locations in northeastern Minnesota, Myers (2016) finds that even relatively short-term leaks of tailing materials on the surface at mining locations in the region could cause substantial loads of sulfate, a major product of acid mine drainage, in the rivers and downstream resources of the BWCAW. The economics literature provides some insights concerning the economic costs associated with these adverse environmental impacts. In a study of acid mine drainage-impaired lakes in rural Ohio, Mishra et al. (2012) find a negative relationship between sulfate levels in impaired lakes and recreational use. The literature (reviewed below) documenting the transition of amenity-rich communities from reliance on extractive industries to tourism-based growth suggests a link between the two: were sulfide-ore copper mining to proceed at the TMM site, a contraction in tourism and recreation-based economic activity could plausibly occur, depending on the extent of mining disamenities that diminish the wilderness experience as well as on the severity of spills, breaches, and/or drainage.

While there have been reports issued on both sides of the issue,⁹ those reports tend to look at snapshots in time, use different assumptions, and do not provide an integrated comparison of the economic costs and benefits of the proposed withdrawal.

Our study aims to fill this gap by providing an accounting of the impacts over time of the potential development of copper-nickel mining adjacent to the BWCAW on regional employment and income. We focus on the proposed TMM project because it is the sole copper-nickel mine currently proposed for the Rainy River watershed. We consider a 20-year horizon, which is the horizon of the Obama Administration's proposed mineral rights withdrawal. Because the focus is on the TMM project, the economic analysis focuses on the greater Ely region including usage of the Boundary Waters Canoe Area Wilderness (BWCAW) and nearby non-BWCAW lakes and forests. The study area is shown in Fig. 1. Our analysis draws on relevant regional and industry data, modeling in previous economic studies of the withdrawal, and the related economics literature. Our employment concept is employment

in industries directly affected by the project (so-called direct employment), plus employment in the directly affected industry's supply chain (indirect employment), plus employment created by spending the earnings from direct and indirect employment (induced employment). Our income concept is total earnings from those direct, indirect, and induced jobs, taking into account differences in wages across sectors.

One of the challenges in this undertaking is the uncertainty around each of the many assumptions needed for this calculation. Although historical data inform distributions for some of our parameters, for others there is no evident way to calibrate a distribution, and moreover some of the parameters could covary and no data are available to quantify those covariances. As a result, a textbook treatment of uncertainty, for example Bayesian or Monte Carlo methods, is not practical in this situation. We therefore use a multiple scenario approach, which (as we explain) results in 72 different scenarios which in turn generate 72 different time paths for income and employment over the 20 years.

We find that, in all our scenarios, mining would produce an initial but temporary net growth of employment and income. Over time, however, the economic benefits of mining tend to be outweighed by the negative impact of mining on the recreational industry and on in-migration, leading to a boom-bust cycle. The preponderance of our scenarios indicates negative net present values of income resulting from the mining project. The primary drivers of the longer-run decline in incomes are increasing productivity in mining (estimated using historical data), reduced amenity-based in-migration, and reduced recreational demand. This boom-bust finding is consistent with recent papers on boom-bust cycles in extractive resource development.

The scope of this study – incomes and employment – is intentionally narrow, and we have omitted multiple factors which are likely important. These omitted factors include: effects on real estate values in the region; proprietors' income and profits; the value of the BWCAW and Superior National Forest as a regional attractor of talent in the Duluth area and elsewhere; and the employment and income driven by the BWCAW and Superior National Forest elsewhere in the state. We also do not consider non-market benefits such as non-market ecosystem services and wilderness existence values.

Although our focus is on the proposed TMM project, our impression is that the challenges confronting our study arise more generally in other natural resource extraction cases. These challenges include competing advocacy studies based on input-output models (or no models) that focus on a specific, unspecified date in the future and which potentially make mutually inconsistent assumptions; a lack of dynamic analysis that incorporates (for example) productivity growth and economic trends; a relative paucity of local data; and considerable uncertainty about key parameters. We hope that the methods used here for reconciling studies and estimating a range of dynamic impacts might be useful in other applications.

We first develop our scenarios and present the net present value calculations. We then discuss factors omitted from this analysis and discuss our results in the context of the relevant academic literature.

2. Computing costs and benefits over a 20-year horizon

We compute annual employment and income for the 20 years of the proposed withdrawal under two cases: the base case of the status quo in which there is no mining, which corresponds to a withdrawal of mineral rights, and the alternative in which the TMM mine is developed. In addition, we compute the net present values of the differences in income between the two cases.

We consider direct, indirect, and induced employment and income effects of the TMM case, relative to the base case. Direct employment is in the industries under study (mining and recreation). Indirect employment is in industries that serve the industry or project under study, for example in the case of mining, the change in employment in industries that provide mining services such as equipment repair. Induced

⁷ Boundary Waters Wilderness Protection and Pollution Prevention Act, H.R. 5598, 116th Cong. (2020), <https://www.congress.gov/116/bills/hr5598/BILLS-116hr5598ih.pdf>.

⁸ The conflict over the proposed TMM project is but the latest phase in a history of tension between mining and environmental concerns in Northern Minnesota, which has generated scholarly as well as public interest. Baeten et al. (2016) document the waste footprint of iron ore and taconite mining in the Mesabi Iron Range. Sutherland (2015) catalogs the challenges of economic transition from mining to tourism faced on the Cuyuna Iron Range, just south of the Mesabi, where production peaked in the 1950s. Bergstrom (2019) examines media coverage of copper-nickel mining in northern Minnesota. Liesch and Keweenaw, (2016) and Thistle and Langston (2016).

⁹ University of Minnesota-Duluth (2012), Hjerpe and Phillips (2013), Sungur et al. (2014), Barber et al. (2014), Minnesota DNR (2015), Phillips and Alkire (2017), Helmberger (2017), Hjerpe (2018), Ward (2018), and Orr et al. (2018).

employment is the employment resulting from the spending of direct and indirect income on local goods and services. The direct and indirect income effects of the TMM counterfactual in a given year are the net effect on incomes from direct and indirect employment in mining and recreation of the TMM project, relative to the withdrawal case, plus the net direct effect on income from those attracted to the region by amenity values. This latter term captures the income spent in the region by those who choose to live in the region because of its amenity effects, and whose decision to live in the region might be affected by the withdrawal/no withdrawal decision.¹⁰

Induced income and employment are “spillover” effects of direct and indirect earnings which operate through a Keynesian multiplier channel.¹¹ Because mining jobs are better-paying than recreation jobs, a job in mining will result in more induced employment and income than a job in recreation. Whether induced employment and income effects actually materialize depends on the availability of unemployed or underemployed resources locally. If there is economic slack, then the direct and indirect earnings can create new local jobs. If, however, the economy is already at full employment, then what is calculated as induced employment either substitutes for other employment as workers change jobs or creates local jobs by expanding the work force as out-of-region workers move into the area. Recent empirical evidence in Auerbach et al. (2019) suggests that on average over periods of recession and expansion, there are nonzero induced local income and employment multipliers. The induced multipliers we use, which are taken from the IMPLAN studies of the Arrowhead economy, fall in the range estimated by Auerbach et al. (2019).¹²

The construction of our scenarios entails developing benchmark assumptions for employment and income under the case of the

withdrawal, then considering alternative assumptions under the TMM counterfactual. To capture uncertainty, we vary key parameters to generate a total of 72 scenarios.

For our employment calculations, we make the following assumptions. For the case of the withdrawal, absent extant third-party growth forecasts of recreational employment in the greater Ely area, we rely on two sources of growth in employment related to recreation. In the Arrowhead region (St. Louis, Lake, and Cook counties), employment in the tourism and hospitality industries from 2012 to 2016 grew by 1.4% per year (Minnesota Department of Employment and Economic Development, 2017). USDA (2016) provides projections of increased recreational usage by category for 2008–2030; for the category “Backcountry/challenge” the annualized growth rate of user-days is 1.2%. We use this latter, lower value as the baseline in the withdrawal scenario because it is more directly relevant to BWCAW usage rather than outdoor recreation generally. Although Arrowhead region employment in recreational industries is available, we are unaware of data on the recreational employment base potentially specifically affected by the TMM project. Full Arrowhead region recreational employment (tourism and hospitality) in 2016 was 13,616, however that includes activity not likely to be directly impacted by the mining, such as hotels and restaurants serving University of Minnesota-Duluth and Duluth hospitals. Using the IMPLAN model and a survey of actual user expenditures, Hjerpe (2018) estimates that BWCAW visits from in-season out-of-region overnight visitors alone supports 879 direct jobs. Canoe camping in the BWCAW is just one way that recreational users take advantage of the outdoors in the region, so jobs potentially affected include more than just those supported by BWCAW out-of-region users. We therefore approximate the narrow direct employment definition from Hjerpe (2018) as accounting for one-fourth of potentially affected jobs. The full Superior National Forest area extends well to the east of Ely (see Fig. 1). For this reason, the assumption of 3516 ($= 879 \times 4$) affected direct jobs could be an underestimate. We therefore consider an alternative case in which the number of affected direct jobs in tourism and recreational is 50% greater, 5274, which is still less than two-fifths the number of recreational and tourism jobs in the tri-county area.

Under the TMM counterfactual, in our high-mining scenario, we assume that TMM direct employment starts at 650 jobs, a figure taken from TMM materials (Twin Metals Minnesota, 2019a; Barber et al., 2014). We consider this estimate to reflect the high end of direct mining employment. The UMD-Duluth (2012) study projected 427 direct employment jobs in non-ferrous mining. In addition, in May 2018 TMM announced that it would scale back the planned mining from 50,000 tons per day to 20,000 tons per day, the figure in its December 2019 proposed Mining Plan of Operations. A proportional employment reduction of the TMM 650 jobs at 50,000 tons/day yields 260 direct employment jobs. We therefore consider two additional mining scenarios, intermediate, at 427 direct jobs, and low, at 260 direct jobs.

As shown in Fig. 2, non-ferrous mining generally, and copper mining specifically in the US, has exhibited substantial gains in productivity. Using the data in Fig. 2, we consider three mining productivity growth scenarios.¹³ In all, this generates nine paths for annual

¹⁰ We compute indirect employment from direct employment using indirect/direct proportionality factors from the IMPLAN model results reported for non-ferrous mining by UMD-Duluth (2012, Table 25) (Arrowhead region plus Douglas County, Wisconsin) and for recreation/hospitality by Hjerpe (2018, Table 5) (northeast Minnesota). Direct and indirect labor incomes are computed from direct and indirect employment using wage rates for 2016 for the Arrowhead region as discussed below.

¹¹ Of the four studies related to the withdrawal that use the IMPLAN model (UMD (2012), Minnesota DNR (2015), Hjerpe (2018), and Orr et al. (2018)), only Hjerpe (2018) and Orr et al. (2018) report labor income. The labor income multipliers (induced/(direct + indirect)) computed from results in Hjerpe (2018) and Orr et al. (2018) are respectively 0.214 and 0.347. With constant marginal propensities to consume out of labor income, the induced income multiplier should be the same for income earned regardless of its source (e.g., mining or recreation). One difference between the two studies that could account for these different multipliers is that Orr et al. (2018) consider state-wide effects whereas Hjerpe (2018) restricts effects to the northeast Minnesota region. Because the focus of our analysis is regional, not state-wide, we use the multiplier 0.214. This induced income multiplier is in line with the (induced/(direct + indirect)) value added multiplier of 0.18 in University of Minnesota-Duluth (2012), which is for the Arrowhead region plus Douglas County, Wisconsin. We compute induced employment from induced labor income using Arrowhead tri-county average wages for 2016. If the larger, state-wide induced multiplier of 0.347 is used, the numerical results change but the qualitative results, both for incomes and employment, do not.

¹² Auerbach et al. (2019) use US Department of Defense spending at the local region level and find that, for each \$1 of US DOD spending in a locality, GDP in that state goes up by \$1.50, so that the GDP multiplier ((indirect + induced)/direct) is 0.50. Their data covers 1997–2016 so includes both the strong labor markets of the late 1990s and mid-2000s and the long period of slack during and recovering from the financial crisis recession. Their estimate of an induced GDP multiplier of 0.50 is consistent with IMPLAN output multipliers. Hjerpe's (2018, Table 5) IMPLAN output multiplier ((indirect + induced)/direct) is 0.59 regionally (not state-wide) for recreation income. UMD's (2012, Table 25) regional GDP IMPLAN multiplier ((indirect + induced)/direct) is 0.43 for non-ferrous mining. The PolyMet FEIS (2015, Table 5.2.10-2) output multiplier is ((indirect + induced)/direct) is 0.55. Orr et al.'s (2018, Table 1) state-wide GDP IMPLAN multiplier ((indirect + induced)/direct) is 0.48.

¹³ Fig. 2 shows an overall positive trend in output per employee in the Arizona copper industry from 1970 to 2016, across all hard rock metal mining from 1987 to 2017, and in underground coal mining separately in the three major U.S. coal producing regions from 2001 to 2016. The declines in copper mining output per employee in the mid- to late-2000's are associated with temporary changes in global commodity prices, and the decline in Appalachian underground coal productivity reflects the contraction in the industry and depletion of the higher productivity mines. The average growth rate of output per employee in the Arizona copper industry, 1970–2016, is 2.1% per year. We incorporate uncertainty using low and high productivity growth scenarios of 1.4%, and 2.7%, which are the end points of a 95% confidence interval for productivity growth estimated from the Arizona data. We assume a constant

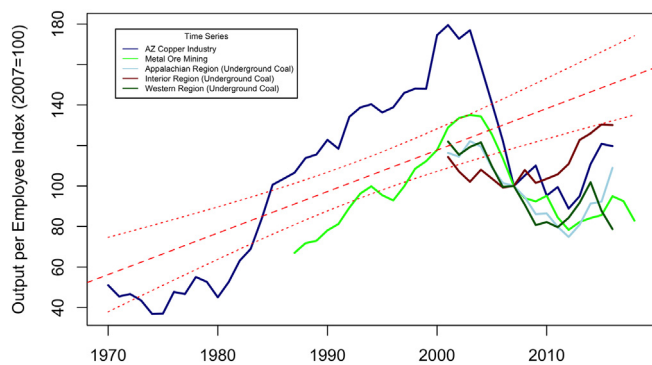


Fig. 2. Output per employee in copper, metal ore, and underground coal mining (index, 2007 = 100).

Sources: Energy Information Administration, 2016, Arizona Department of Mines and Mineral Resources, 1970, U.S. Geological Survey, 2015, Bureau of Economic Analysis, 1970–2017, Bureau of Labor Statistics, 1987–2016.

mining employment (three initial levels, three productivity growth rates).

Under the TMM counterfactual, we consider two paths for recreational employment, a low-impact path and a high-impact path. Because we are not aware of a directly comparable project (large-scale copper-sulfide-ore mining proximate to a water-based wilderness area) for which there are historical data, we consider a scenario in which recreational employment contracts at the rate of 1.2% per year and another in which it contracts at the rate of 2.4% per year. The first of these rates reverses the growth projected under the USDA baseline (USDA, 2016). The second of these rates is a reversal of twice the growth projected under the USDA baseline (USDA, 2016).¹⁴ These counterfactuals are in line with previous studies of growth of other US amenity-based regional economies.¹⁵

We consider the high-impact scenario conservative in the sense that

(footnote continued)

annual extraction rate, so that employment falls by the rate of growth of productivity for the three productivity scenarios.

¹⁴ Rasker and Hackman (1996) examine employment and income trends in northwestern Montana and find that from 1969 to 1992, employment in counties characterized by pristine wilderness grew by 93%, an annualized rate of 2.9%. In contrast, resource-extractive counties observed employment growth of 15% over the same period, an annualized rate of 0.6%, a difference of roughly 2.3 percentage points. The scenario in which recreational employment contracts at the rate of 1.2% represents a difference of roughly 2.4 percentage points with respect to the withdrawal scenario. Thus, our rate of a 1.2% contraction in hospitality employment is reasonable assuming a reversal of Rasker and Hackman's (1996) estimate and is perhaps conservative given the degree to which hospitality and tourism employment is amenity-dependent.

¹⁵ Rasker and Hansen (2000) examine rural counties in Idaho, Montana, and Wyoming and find that ecological and natural amenity variables are correlated with population growth in these areas. Deller et al. (2001) find similar results, finding a positive relationship between population growth and publicly owned land resources related to tourism. Winkler et al. (2007), find that "New West" communities, areas typically characterized by amenity migration, see anywhere from 38% to 195% higher employment in the tourism industry when compared to "Old West" communities. According to Winkler et al. (2007), this transition from "Old" to "New West" economic models has occurred over a 30-year period, which would imply an annual growth rate of between 1.2% and 6.5%. Empirical evidence supports the assertion that amenity-driven growth has supplanted extractive industries as the foundation of many amenity-rich, rural western counties (Lorah and Southwick, 2003). Rasker et al. (2013) find a positive relationship between growth in employment and proximity to protected public lands using data on federal lands in non-metropolitan Western counties. Henderson and McDaniel (2005) study sector-level employment growth and USDA natural amenity indices in more than 2000 rural U.S. counties, and find a statistically significant, positive relationship between landscape amenities and service sector employment growth.

the impact on tourism over the long run of a major spill or acid mine drainage event are plausibly substantially more consequential.

For the income scenarios, the incomes associated with direct mining and recreational employment are computed using average local wage rates in those industries (Bureau of Labor Statistics, 2018; Minnesota Department of Employment and Economic Development, 2017). Employment in indirect and induced jobs are assumed to earn the average wage for the tri-county region in 2016 (Bureau of Labor Statistics, 2018; Minnesota Department of Employment and Economic Development, 2017).

The remaining component of income is the direct effect from those who move away from the region because of the mining and the related direct effect of those deterred from moving to, or retiring in, the region because of the mining (the "in-migration direct income"). To estimate this component, we used as a baseline the 2016 Census Bureau American Community Survey (U.S. Census Bureau, 2016) total income of the five-township Ely region (Ely, Eagles Nest, Fall Lake, Morse, and Stony River). We projected withdrawal baseline income growth as the sum of per-capita income growth and population growth. Our per-capita income growth projection is the historical per-capita income growth from 1970 to 2016 for the Arrowhead counties (Headwaters Economics, Economic Profile System, 2018). There is a large literature that documents increased population growth in amenities-rich areas (see Rickman and Rickman (2011) and Holmes et al. (2016) for surveys). We adopt the population growth rate from Rickman and Rickman (2011) for counties with USDA amenity rank equal to the average Arrowhead amenities rank (McGranahan, 1999). For the TMM counterfactual, we considered two scenarios for in-migration direct income. Polling by Sungur et al. (2014) found that 23% of residents would consider moving from the region in the event that the TMM project were undertaken. This estimate strikes us as high and many of those who would consider moving might not actually move. We therefore consider two scenarios one in which population growth slows to zero and a second in which in-migration population for amenity values declines by 10% over the 20-year period, less than half of the estimate in (Sungur et al., 2014).¹⁶

3. Results

In all, these assumptions generated 72 employment and income paths under the various scenarios. The employment paths are plotted in Fig. 3, and the income paths are plotted in Fig. 4.

All the scenarios in Figs. 3 and 4 show a similar pattern. Initially, mining is economically beneficial because of the new mining jobs, the income they produce, and their spillovers to the local economy. Over time, however, the net effect of the mining jobs erodes because of the growth of productivity in mining, the stagnation or decline of amenity-based in-migration, and the decline in wilderness-based recreation as a result of impacts of mining on the recreation industry. The magnitude and timing of the effect on employment and incomes varies across scenarios.

We computed the net present value for each of the income paths, using a 3% real discount rate (Office of Management and Budget, 2003). A histogram of these net present values is presented in Fig. 5. In 89% of the cases, the net present value of the TMM counterfactual is negative, that is, the income benefits of mining are outweighed by the income costs on recreation and in-migration. The cases for which the net present value of the TMM project are positive are those in which mining employment starts at the highest level (650 jobs, despite the

¹⁶ In-migrants are treated as bringing income to the economy but are not a business so do not undertake direct hiring, so there is no direct or indirect employment from this channel. That income is spent in part in the community, so it does generate induced employment and income, which are computed in the same way as induced employment and income from mining and recreation.

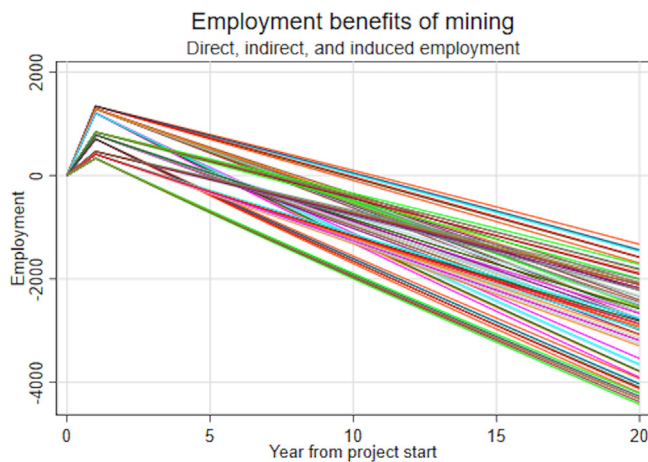


Fig. 3. Net annual employment effects (direct, indirect, and induced) of the TMM counterfactual over time on the Arrowhead economy. A positive employment value means that, under that scenario, the number of jobs in the TMM mining case exceeds the number of jobs in the no-mining baseline.

Notes: the horizontal axis denotes time, starting with the commencement of production at the TMM site.

Source: Authors' calculations.

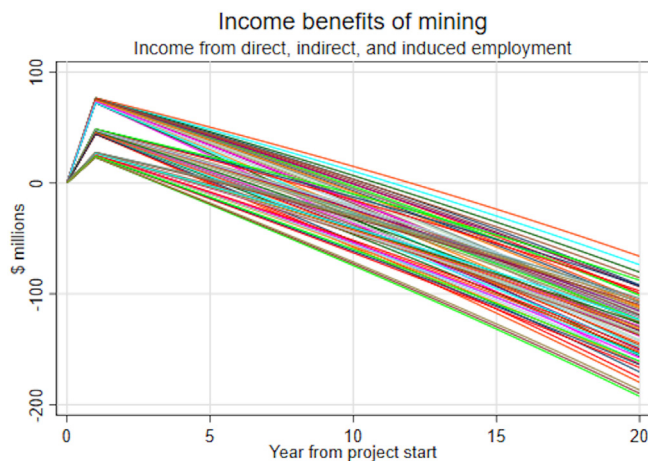


Fig. 4. Net annual income effects (direct, indirect, and induced) of withdrawal over time on the Arrowhead economy. A positive income value means that, under that scenario, the annual income in the TMM mining case exceeds the annual income in the no-mining baseline.

Notes: the horizontal axis denotes time, starting with the commencement of production at the TMM site.

Source: Authors' calculations.

2018 announcement and 2019 Mining Plan of Operations in which the project is scaled back) and impacts to tourism jobs and amenity-based in-migration are low.

4. Our estimates in the context of other studies

4.1. Other studies of rural economic growth and amenities

Multiple studies conclude that outdoor recreation and recreational amenities, especially wilderness amenities, have been the basis for strong and sustainable economic growth in rural communities with those attributes over the past two decades. This literature looks at a variety of measures including income, job growth, population growth in wilderness-abutting regions, willingness-to-pay, and property values. In early influential research, [Deller et al. \(2001\)](#) studied rural U.S. counties and concluded that “the empirical results provide strong evidence

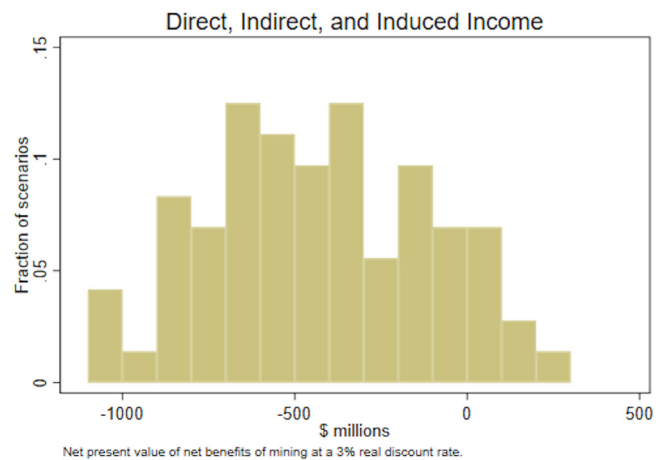


Fig. 5. Histogram of the net present value (NPV) of income in the 72 scenarios. Source: Authors' calculations.

that rural areas which can be characterized as endowed with high levels of key natural resource amenity endowments and overall quality of life experience higher overall levels of growth” (p. 363). [Rickman and Rickman \(2011\)](#) examine population trends and measures of outdoor and recreational amenity in nonmetropolitan counties across the U.S.; they establish a positive relationship between amenity values and population growth. [Lorah and Southwick \(2003\)](#) look at the role of protected federal lands, which hold an intrinsic natural amenity value, on rural population growth in western counties and find that counties with protected federal lands within 50 miles of their center grew approximately 12 times faster than nonmetropolitan western counties without protected federal lands within 50 miles of their center. [Poudyal et al. \(2008\)](#) analyze nationwide county-level data on the role of natural resource amenities in attracting retiree in-migration; they find that the percentage of a county under forest, the quantity of high-quality water resources, and the presence of federally-protected National Parks are all statistically significant drivers of retiree in-migration. [Winkler et al. \(2007\)](#) finds similar demographic trends. [McGranahan et al. \(2011\)](#) study the underlying mechanism whereby sustainable growth is linked to amenity values and find that this growth has an endogenous element through the channel of entrepreneurs being attracted to rural locations with high outdoor amenity value.

[Holmes et al. \(2016\)](#) provide a recent survey of the literature on valuation of proximity to wilderness areas. In addition to reviewing estimates of the local economic effects (or “onsite” values) examined here, they include a discussion of “offsite” values on which we have not relied. These “offsite” values include both “use” values (e.g., residential property values; see below) and three so-called “passive use” values: existence value, option value, and bequest value. They argue that these passive use values can be large, a point that is relevant to the withdrawal proposal because they attempt to estimate directly the value of pristine wilderness.

These studies validate the inclusion of in-migration effects that are supported by the withdrawal and are potentially at risk if the withdrawal does not occur. In addition, these studies support a broader interpretation of the value of the BWCAW and Superior National Forest as an attractor of non-tourism, non-retirement jobs to the area because of the proximate wilderness. This latter category of job is not included in our study, and by excluding such jobs our study is conservative and understates the economic benefits of the withdrawal.

4.2. Resource extraction and sustainable growth

The question of resource extraction and economic growth has long been of interest in the economics literature at the country level (e.g., oil export economies), regional level, and local level. Although we are not

aware of any recent hard-rock mining studies on sustainable local growth, the boom in nonconventional oil and gas development has stimulated recent research on extractive resource growth cycles.

Jacobsen and Parker, (2016) study county-level data for the American West and examine the consequences of oil and gas well drilling arising from the oil price increases of the 1970s and early 1980s. They find “that the boom created substantial short-term economic benefits, but also longer-term hardships that persisted in the form of joblessness and depressed local incomes.... In the longer run, after the full boom-and-bust cycle had concluded, we find that local per capita income was about 6% lower than it would have been if the boom had never occurred.” (p. 1093).

Allcott and Keniston, (2018) study US county-level manufacturing data in connection with oil and gas booms and conclude that “while county-level population, employment, wages, and revenue productivity are all procyclical [i.e. all go up in the initial extractive stage], the booms are cancelled out by the busts. By the end of the 1990s, we see no significant remaining long-term effects of the boom and bust cycle of the 1970s and 1980s (p. 697)”.

There is also some work on the economic impacts of nonconventional oil and gas extraction, however the scope for dynamic analysis is limited because that development is new and insufficient time has elapsed to observe a full cycle. One set of limited dynamic estimates is provided, however, by Feyrer et al. (2017). They use local geographic data to provide some estimates of the dynamic effect of nonconventional oil and gas extraction in the 2000s; they find that it has large employment effects, but that those employment effects are transitory at the local level. They only estimate dynamics over the first two years following the initial local extraction shock and find that wage income gains, including direct, indirect, and induced, dissipate by 1/3 within two years (the dissipation is faster if only direct and indirect wages are considered, see their Fig. 4). Because the technology for nonconventional oil and gas extraction has a shorter life cycle than hard rock mining or conventional oil and gas extraction, the findings of these studies are all qualitatively consistent with an extractive boom-bust cycle.

These studies are designed to estimate the effects of these booms on counties with average amenity values. Thus, these estimates capture the boom-bust effect on resource extraction and related jobs but do not include any special effects that resource extraction disamenities or environmental damage would have on employment and in-migration related to high-amenity regions like the area surrounding the BWCAW. Such effects would exacerbate the boom-bust nature because of the deterioration in environmental conditions and amenity values that would reduce non-mining amenity-related incomes.

4.3. Property values and mining disamenities

There is substantial evidence that mining disamenities reduce housing values. In their study of acid mine drainage (AMD) from coal mining in the Cheat River Watershed of West Virginia, Williamson et al. (2008) find that location near an AMD-impaired stream has an implicit marginal cost of \$4783 on housing, or nearly 12.2% of a home's value. Kim and Harris (1996) examine the broader suite of possible mining disamenities and their effect on property values near a copper mine in Green Valley, AZ and find that parcels closest to the mining site lost 5.74% of their value with homes further away losing 0.66% of their value. In their study of sulfide-ore copper mining in the Arrowhead region, Phillips and Alkire (2017) use Kim and Harris' (1996) findings to estimate that the total loss in property value due to sulfide-ore copper mining would be approximately \$508 million (2016 USD), or roughly 1.9% of the total property value of the three Arrowhead region counties. This is a large value which, if added to the NPVs in Fig. 5, would make all the NPVs negative.

Phillips and Alkire's (2017) estimate of a decline of 1.9% is in the range of those in related studies. Boxall et al. (2005) examine the

impact of oil and gas facilities on rural residential property values in central Alberta, Canada using hedonic regression methods for property valuation.¹⁷ They find that location within four km. of industry facilities leads to a four to 8% decrease in property value. Leggett and Bockstael (2000) use a hedonic property model to show that water quality has a significant effect on property values along the Chesapeake Bay, an amenity-rich, non-metropolitan setting with high recreational value. Poor et al. (2007) find a similar result in the Chesapeake Bay watershed examining non-point source pollutants, including suspended solids and nitrogen. In a study of the impact of lake water clarity on New Hampshire lakefront properties, Gibbs et al. (2002) find that water clarity—a measure of the degree of eutrophication—has a significant effect on prices paid for residential properties. More recent research linking local water quality to higher property values includes Keiser and Shapiro (2019) and Kuwayama et al. (2019).

In the case of the proposed withdrawal, these negative effects on housing values would be compounded by the downward pressure on housing values from reduced in-migration or, possibly, out-migration. Consistent with the boom-bust literature, one could see an initial rise in housing values as mine and associated industry workers buy or rent in the greater Ely area, however that increase would be temporary as mining employment, recreational employment, and in-migration housing demand subsequently decline. By omitting this effect, our analysis is conservative and likely understates the benefits of the proposed withdrawal.

5. Conclusion

We find that, over the 20-year time horizon of the proposed withdrawal, introducing copper-nickel mining in the Superior National Forest is likely to have a negative effect on the regional economy. Our calculations omit some factors, notably the negative effect of mining on real estate values, that would strengthen this conclusion. We reviewed the relevant literature and conclude that our findings are consistent with the literature, most notably the history of boom-bust economies associated with resource extraction that leave the local economy worse off.

In addition to adding to the debate over copper-nickel mining in the Superior National Forest, our study contributes to the broader literature on the tradeoffs between resource extraction and natural amenity-based economic growth. Our findings highlight the importance of considering the long-term effects of resource extraction in natural amenity rich areas. While estimates of the employment effects of the TMM project are positive in the short run, accounting for the well-documented boom-bust cycle that characterizes resource extraction results in negative estimates of the overall effect of allowing mining in the Superior National Forest. This analysis also demonstrates the importance of modeling dynamic responses to resource extraction in amenity-based income, for example through decreased in-migration and reduced demand for amenity-driven recreation.

Our study points to opportunities for future research. As noted previously, we omit several factors which are likely important to fully understand the impacts of allowing mining near the BWCAW, including both market values (such as housing) and non-market values (ecological services). Future work examining the effects of copper-nickel mining in this region should examine the long-run effects of mining on these additional values. More broadly, the prospective modeling approach of our study, which is shared by many other studies in this field, would ideally be complemented by empirical analysis of historical data. Additional work is needed on ex-post evaluation of the economic effects

¹⁷ Hedonic regression is a method for estimating the value of a characteristic of a good when that characteristic is not sold separately but instead is part of a bundle of characteristics embodied in the good; see for example Haab and McConnell, 2002.

of resource extraction in comparable, ideally quasi-experimental, settings.

Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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Shipstead-Newton-Nolan Act

The Shipstead-Newton-Nolan Act was passed in 1930 to protect the pristine quality of the lakes and rivers of northeastern Minnesota. The Act applies to Federal lands north of Township 60 North, from Lake Superior on the east to Birch Lake on the west; then lands north of Township 63 North west to the Nett Lake Indian Reservation; then lands north of Township 65 North, west to the St. Louis County line. The area includes roughly 112 townships of 36 square miles each, or roughly 4,000 square miles. **Within this area, logging within 400 feet of lakes and navigable streams is prohibited, and water levels may not be altered by dams.**

In 1933, the State of Minnesota passed the Little Shipstead-Newton-Nolan Act which extended the provisions of the Federal Act to State lands in the same area.

These two laws protect an area of roughly 4,000 square miles which contains 1,500-plus lakes and over 2,000 miles of canoe routes.

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