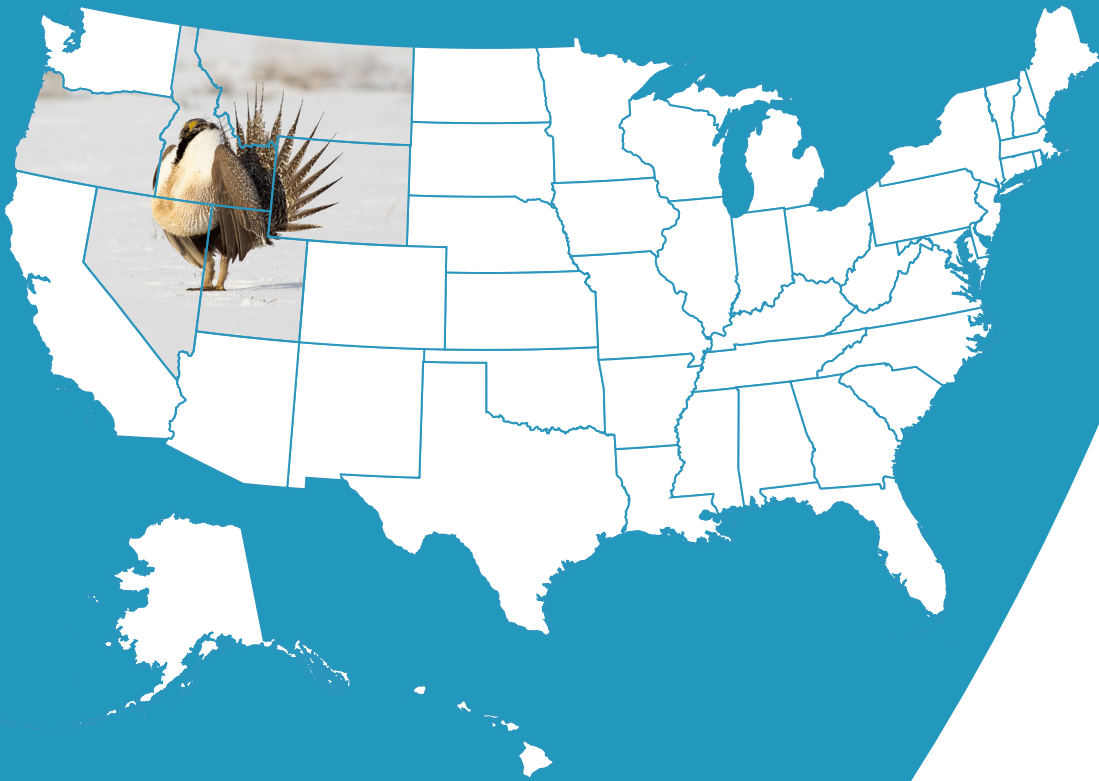


U.S. Department of the Interior's Sweeping Land Withdrawals
Threaten U.S. Minerals Security



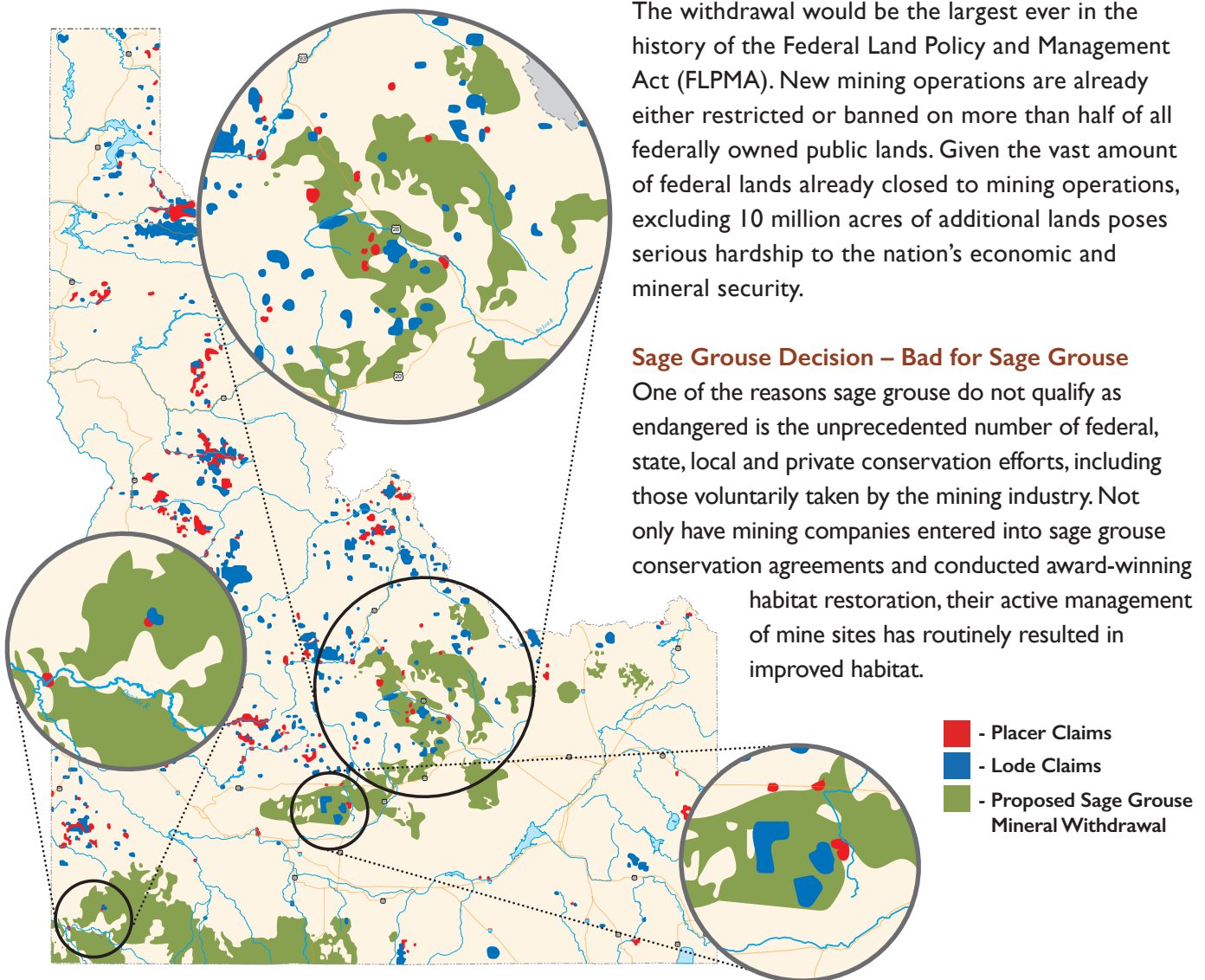
March 2016

Department of Interior Land Withdrawals

Unprecedented Proposal Harms U.S. Economy and the Environment

Based on recommendations by the U.S. Bureau of Land Management (BLM) and U.S. Forest Service (FS), the Department of Interior is proposing to withdraw up to 10 million acres of sage grouse habitat from new mining operations. This over-reaching and unprecedented action would seriously damage the United States economy and mineral security, while harming the very species it purports to protect.

Proposed Land Withdrawals – Idaho



Sage Grouse Decision – Bad Public Policy

After years of exhaustive studies, The Department of the Interior (DOI) recently announced that listing of the greater sage grouse as endangered under the Endangered Species Act (ESA) is not warranted. Despite the department's finding that mining is not a major threat to the bird or its habitat, DOI incomprehensibly is proposing to withdraw an enormous amount of land in six states from consideration for future mining activity.

The withdrawal would be the largest ever in the history of the Federal Land Policy and Management Act (FLPMA). New mining operations are already either restricted or banned on more than half of all federally owned public lands. Given the vast amount of federal lands already closed to mining operations, excluding 10 million acres of additional lands poses serious hardship to the nation's economic and mineral security.

Sage Grouse Decision – Bad for Sage Grouse

One of the reasons sage grouse do not qualify as endangered is the unprecedented number of federal, state, local and private conservation efforts, including those voluntarily taken by the mining industry. Not only have mining companies entered into sage grouse conservation agreements and conducted award-winning habitat restoration, their active management of mine sites has routinely resulted in improved habitat.

Importance of Minerals to U.S. Economy

The value added by major industries that consume the \$78 billion of minerals produced in the U.S. is an estimated \$2.5 trillion (2014), or 14 percent of our GDP.

Mining's direct and indirect economic contribution includes nearly 2 million jobs with wage and benefits well above the state average for the industrial sector.

Domestic mining generates \$46 billion in tax payments to federal, state and local governments.

“Our nation’s import dependence for key mineral commodities has doubled over the past two decades.”

Importance of Minerals to U.S. Security

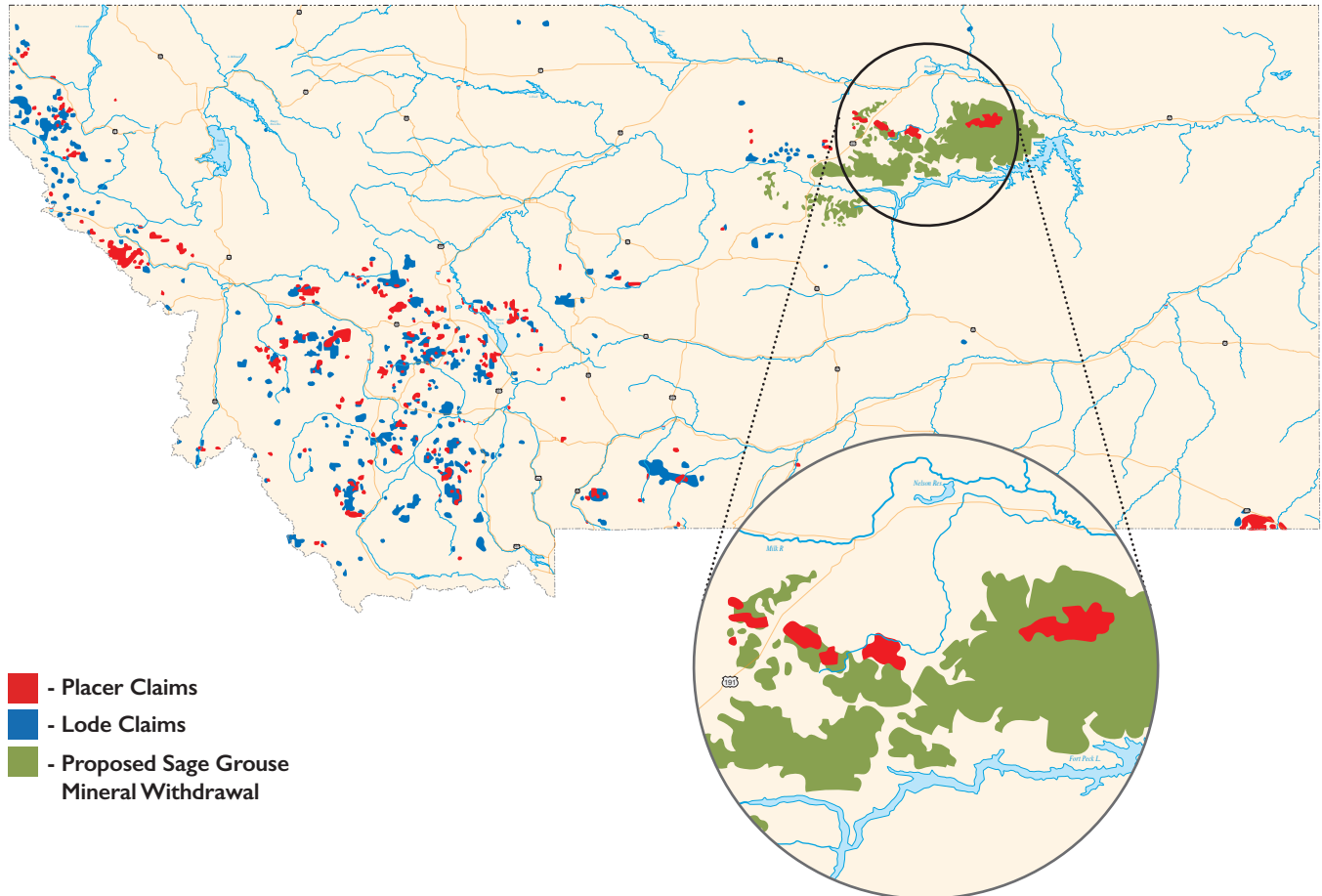
Our nation’s import dependence for key mineral commodities has doubled over the past two decades.

The U.S. is import dependent for 19 key mineral resources and more than 50 percent import dependent for an additional 24 mineral commodities.

Less than half of the mineral needs of U.S. manufacturing are met from domestically mined resources.

Our growing dependence on imports leaves many key domestic industries unnecessarily vulnerable to disruptions from extended, complex and fragile supply chains.

Proposed Land Withdrawals – Montana



Minerals Production Requires Public Lands Access

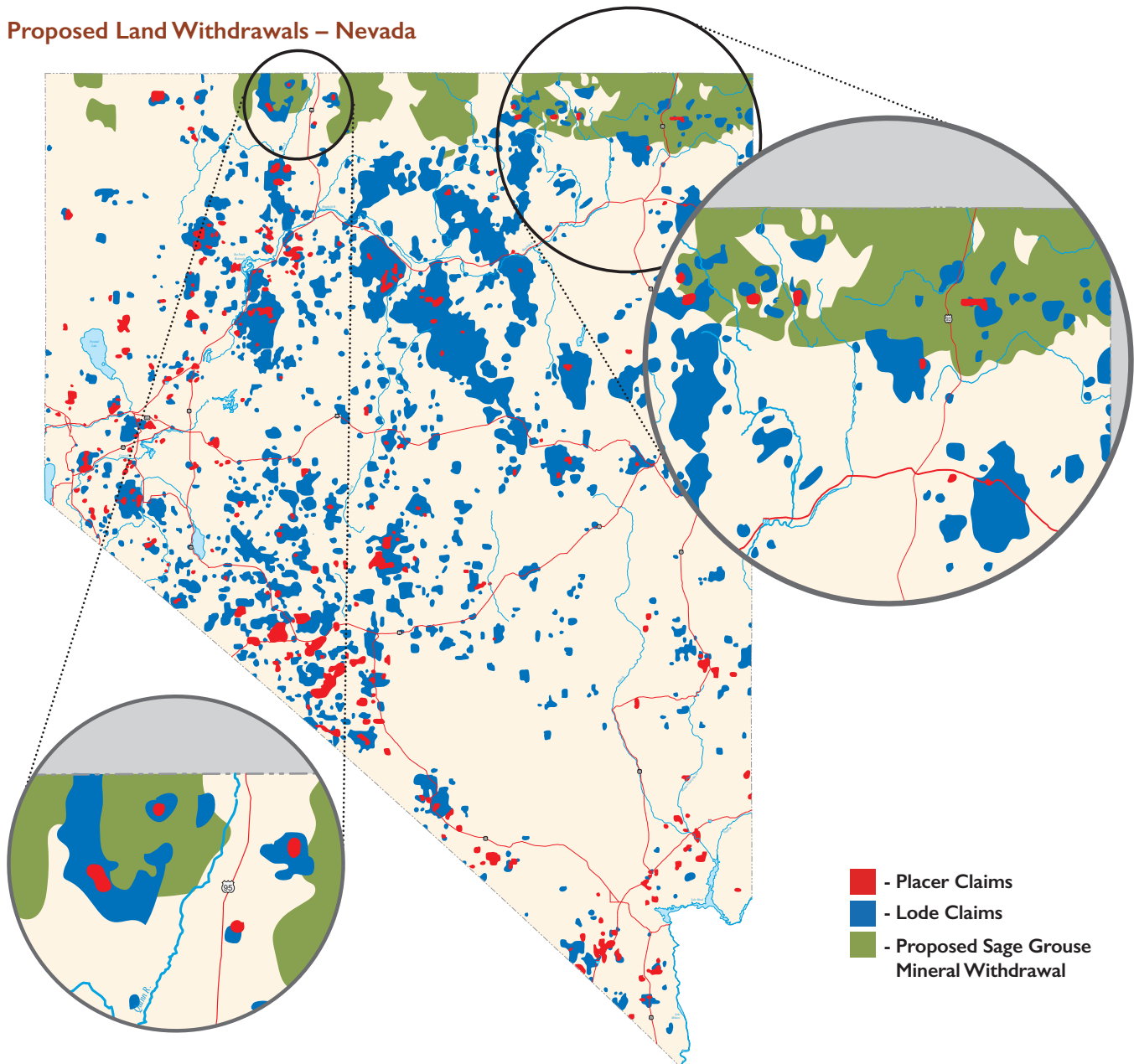
Federal lands account for as much as 86 percent of the land area in certain Western states and these same states account for 75 percent of our nation's metals production.

Already half of the nation's hardrock mineral estate is either off-limits or under restrictions for mineral development. An additional 10 million acre withdrawal of federal lands for a single species will have a significant impact on the ability to develop domestic minerals on federal lands.

“Already half of the nation's hardrock mineral estate is either off-limits or under restrictions for mineral development.”

Developable mineral deposits are difficult to find as concentrations of useful minerals rich enough to form ore deposits are rare phenomena. As such, widespread exploration for minerals, including resource-rich federal lands, is necessary to find these elusive deposits.

Proposed Land Withdrawals – Nevada



Active Mining Claims Indicate Additional Mineral Potential

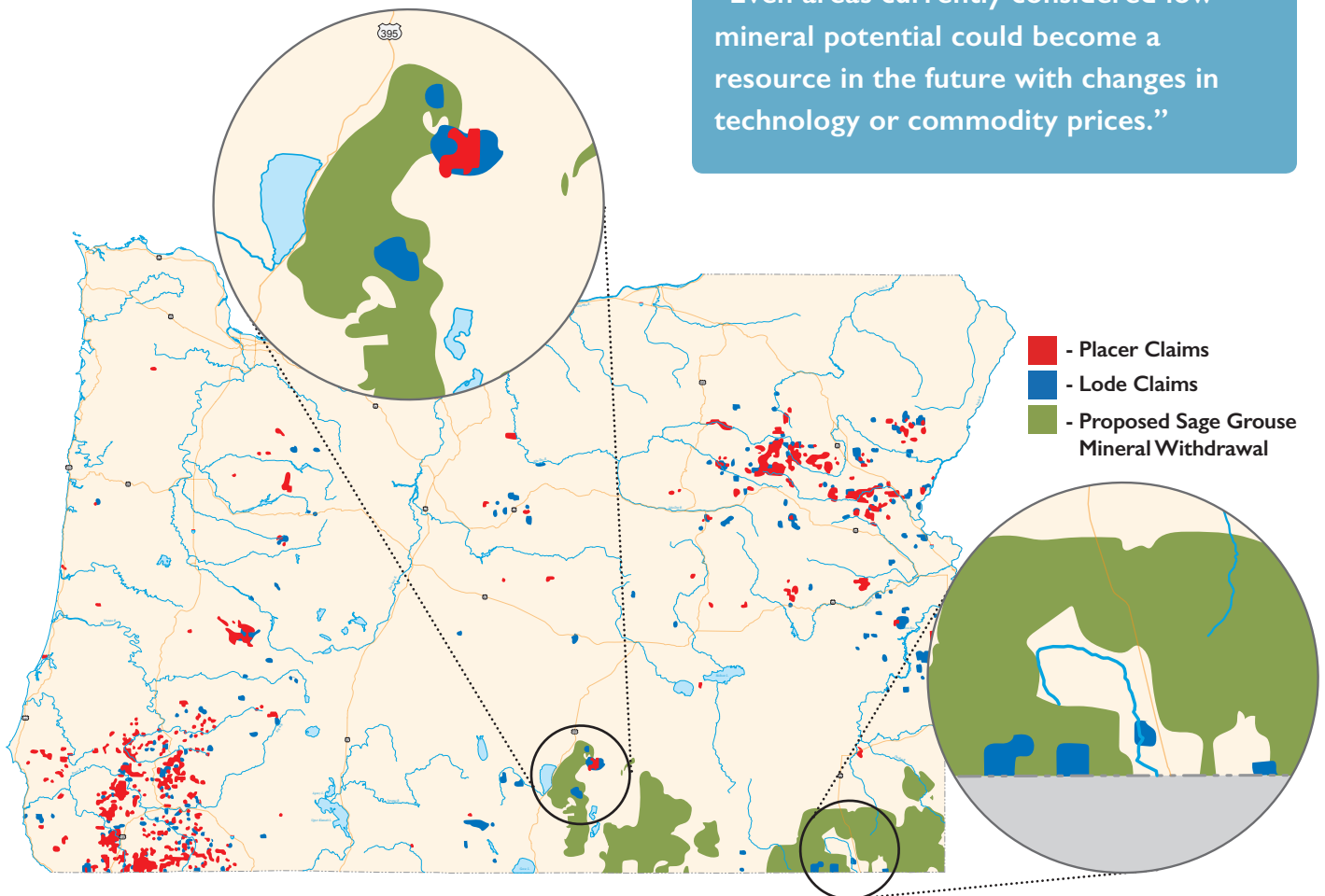
BLM statements that the proposed withdrawal areas are of low mineral potential are unconvincing. Existing U.S. Geological Survey data indicate that there are likely recoverable mineral resources in many of these areas. According to BLM records, the area proposed to be withdrawn includes nearly 5500 active mining claims.

The presence of mining claims is a good indication of known mineral potential. The mineral potential report required prior to a withdrawal decision is expected to confirm significant mineralization in much of the proposed withdrawal area. Even areas currently considered low mineral potential could become a resource in the future with changes in technology or commodity prices.

State	Proposed acreage to be withdrawn from mining	Number of active mining claims in Sage Grouse Focal Areas	Acreage of active mining claims in Sage Grouse Focal Areas	Percentage of focal areas impacted by active mining claims
Idaho	3,854,622	634	13,098	0.34%
Montana	983,156	677	13,986	1.42%
Nevada	2,797,399	3762	77,722	2.78%
Oregon	1,929,580	373	7644	0.39%
Utah	230,808	9	186	0.08%
Wyoming	252,162	13	5140	2.04%

Proposed Land Withdrawals – Oregon

“Even areas currently considered low mineral potential could become a resource in the future with changes in technology or commodity prices.”



- - Placer Claims
- - Lode Claims
- - Proposed Sage Grouse Mineral Withdrawal

10 Million Acres – Excessive and Unnecessary

DOI maintains that the withdrawal is necessary to prevent a listing of the sage grouse. However, most of the reports prepared for the listing determination do not identify mining activities as a significant threat and instead point to wildfires and invasive species as the greatest threats.

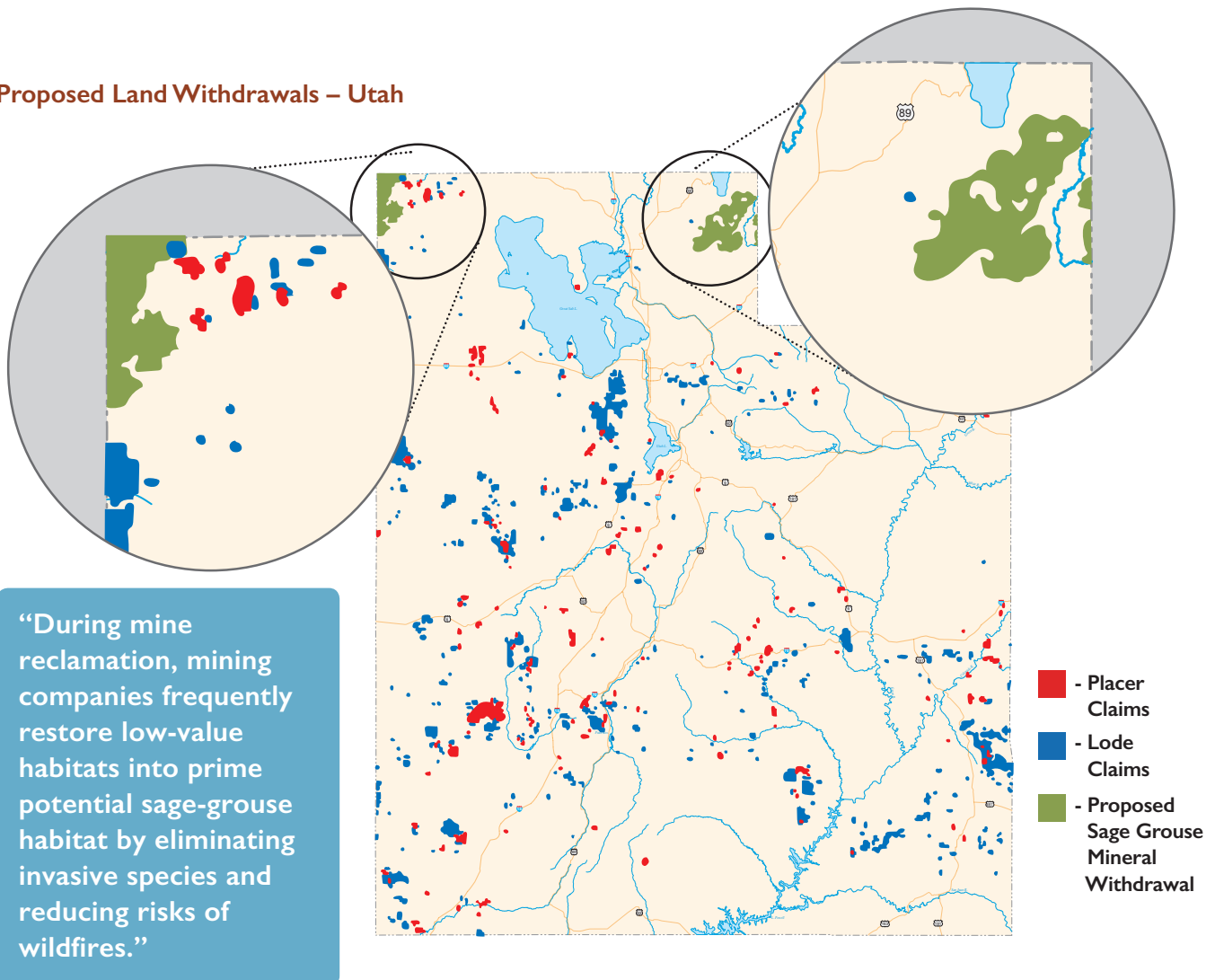
In fact, the agency's own report shows that all development activities only impact seven percent of the entire ecoregion, yet mining is asked to pay the price with mineral withdrawals which are vastly disproportionate to its footprint.

The withdrawal ignores the role that mining companies take in actively managing the federal

lands on which they operate. During mine reclamation, mining companies frequently restore low-value habitats into prime potential sage-grouse habitat by eliminating invasive species and reducing risks of wildfires.

The withdrawal is contrary to DOI's "Multiple Use Mandate" under FLPMA. As articulated in BLM's 2006 Minerals and Energy Policy, under that mandate BLM's land use planning and multiple-use management decisions will recognize that, with few exceptions, mineral exploration and development can occur concurrently or sequentially with other resource uses and that the least restrictive stipulations that effectively accomplish the resource objectives or uses will be used.

Proposed Land Withdrawals – Utah



Withdrawal An Unauthorized DOI Power Grab

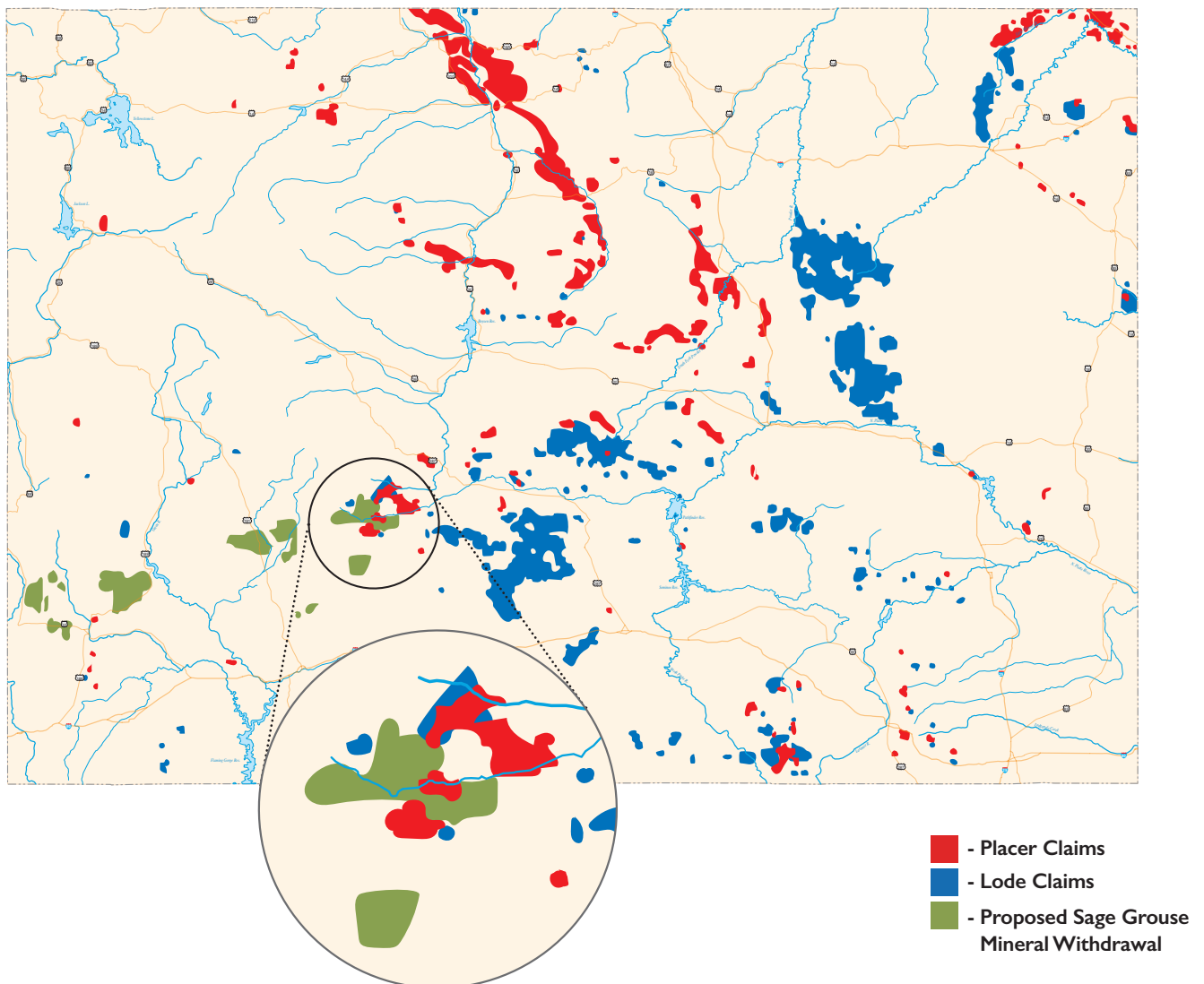
The areas to be withdrawn were identified without adequate opportunity for public comment and regardless, a withdrawal of this size is beyond the DOI's authority.

The 10 million acre withdrawal is premised on “sage grouse focal areas”— a land management scheme devised by the BLM after the public comment period for the land use management plan amendments had closed and the public has been denied an opportunity to comment on this critical element of the decision.

In FLPMA, Congress specifically acknowledged the importance of mining on federal lands and minerals' contribution to society. In fact, FLPMA requires Congressional approval if mining activities are to be curtailed by large-scale withdrawals. Specifically, mineral withdrawals of more than 5,000 acres are subject to Congressional approval which the DOI has not received.

“Congressional approval is required if mining activities are to be curtailed by large-scale withdrawals.”

Proposed Land Withdrawals – Wyoming



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