

Mining Action Group

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“They tried to bury us. They didn't know we were seeds.”
- Mexican proverb



Mining Action Group

Written Comments re: Metallic Minerals Direct Lease Requests by Eagle Mine LLC
Submitted August 25, 2017

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Introduction

On behalf of the Mining Action Group (MAG) of the Upper Peninsula Environmental Coalition (UPEC), advisors, and supporters, we are writing to submit comments related to the following mineral lease request:

“Eagle Mine LLC, of Champion, Michigan, has requested direct development metallic minerals leases from the State of Michigan covering Department of Natural Resources (DNR) metallic mineral rights located within T47N R34W, T47N R35W, T51N R30W, and T51N R31W, located in Baraga County; also T47N R35W and T47N R36W, located in Houghton County; also T46N R34W and T46N R35W, located in Iron County; and T50N R28W, located in Marquette County, containing a total of 15,274.27 acres, more or less.”

In reviewing these lease nominations, MAG reached out to a number of regional environmental stakeholders, including members of the Upper Peninsula Environmental Coalition, the Keweenaw Bay Indian Community (KBIC), the Yellow Dog Watershed Preserve, the Iron County Watershed Coalition (ICWC) and the Superior Watershed Partnership (SWP).

We find broad concern about the scope of the proposed leases, the trend of increasing mineral exploration targeting public lands, and the specific threats posed to natural resources (water quality risks, habitat disruptions, industrial land uses incompatible with land management goals, etc.). After reviewing the State of Michigan Department of Natural Resources (DNR's) public notice file, lease summaries, parcel reviews (where made available), maps (not provided by DNR), and land management plans, we wish to express the following concerns, objections, and recommendations.

Concerns About Due Process, Public Information, and Public Participation

Generally speaking, the DNR has failed to adequately inform or educate the public about the proposed metallic mineral leases. Given the staggering scope of the lease request, it is unfortunate that DNR did not hold meetings in impacted counties to discuss the proposed leases. Additional concerns about due process, information, and public participation:

- The DNR does a disservice to the public by providing the lease nominations as a long list of legal descriptions. Most concerned citizens cannot read legal property descriptions, and do not own plat map books corresponding to the multiple counties in which the thousands of acres of nominated mineral leases are located.
- **Recommendation:** the DNR's Mineral Lease office should provide either GIS maps or links to Google Maps showing location of all parcels under lease review.
- In the DNR's summary ("[Metallic Minerals Development Direct Lease Nominated Between 02/13/2017 and 02/13/2017](#)") the most common stipulation listed is "Best Management Practices" but this phrase is not internally defined. Many of the nominated leases are "LDR" or *Leasable, Development with Restrictions*; others are "LD" *Leasable, Development*. **These terms are not defined, and should be clearly defined for the public.**
- The DNR's website for metallic mineral leases fails to provide any detailed explanation of the stipulation codes. It also contains an important **error: the FAQ link provided links to the DNR's Oil and Gas Lease FAQ, rather than an FAQ sheet specific to the leasing of minerals.**

- The DNR lease summary contains no additional links – no further information, maps, or parcel reviews are provided. This is clearly a lost opportunity to educate and engage the community, and makes commenting on this lease request significantly more difficult.
- The DNR does not provide links to detailed Parcel Reviews except by specific request (email), and nothing in the DNR’s Public Notice of the lease nomination mentions Parcel Reviews, or explains that Parcel Reviews *may be requested*, so most concerned citizens are unaware of the process by which the complete, additional information may be obtained.
- **Recommendation:** the DNR’s Mineral Lease office should *automatically provide detailed Parcel Reviews* (rather than only upon request). Further, the Parcel Reviews should be provided during public notice stage, ideally, linked directly from the parcel or legal property description.
- **Recommendation:** a key/glossary defining ALL potential Mineral Lease Stipulations, *defined by number*, should be made available as a clear link within the Public Notice. The FAQs sheet should also be updated to include a link to a glossary explaining leasing terms and stipulations.

Comments on Mineral Leases, by County – [map \(PDF\)](#)¹

Marquette County Lease Request

Only one parcel of State of Michigan land (40 acres) has been nominated for mineral lease request in Marquette County, on state land located SE of the Eagle East deposit. According to the Mineral Lease parcel review notes by DNR staff, the stipulations for this parcel include restrictions related to two rare species: Narrow-Leaved Gentian, listed as state Threatened, and Kirtland’s Warbler, listed as state and federally Endangered.

*In fact, the site under consideration is **directly adjacent** to a functioning Kirtland’s Warbler habitat project located on Weyerhaeuser (formerly Plum Creek) CFA land, established with federal funding.*

Development of this special and successful Kirtland’s Warbler habitat project commenced in 2008 or 2009, near the Yellow Dog River. Work was initiated by Plum Creek with the support of Yellow Dog Watershed Preserve, which monitors lands in this riparian corridor.

For clear and obvious reasons, we feel this parcel should not be approved for mineral leasing. DNR staff apparently share our concerns – the parcel review notes include this alarming comment by Wildlife Division’s Brian Roell, who wrote:

"To protect nesting neo-tropical migrant birds (Kirtland Warbler) during the nesting and fledging period **work should be restricted from 6/1 – 7/15. This section not only contains known Kirtland Warbler sites it also contains narrow-leaved gentian; before any development a survey for this these birds, plant and any other Threatened or Endangered plants or animals should occur. While the impacts to wildlife populations and habitat appear to be insignificant I am concerned that the present and anticipated increase of mining exploration activity in this area could individually and/or cumulatively; adversely impact the long-term viability of various wildlife populations in this region."**²

We concur with Mr. Roell. Note that Kirtland’s Warbler observations (singing males) have been recorded at this location. The property is in T50N R28W, south of Triple A Road and just north of Yellow Dog River. The Kirtland-protective activity limit proposed is only one month, which is clearly insufficient for protection of these rare ground-nesting songbirds.

¹ Since the State of Michigan failed to provide a map, we created this map for review and reference purposes.

² <https://drive.google.com/open?id=0BwDqaes6rJxSYWVmX0ppTGIOLXJyQV9ldHJCXYFydFRKRE5F>

The review of this parcel also fails to mention the documented presence of Spruce Grouse in this area. The Spruce grouse is listed as Special Concern by the Michigan DNR. Given the widening intrusion of sulfide mining and mineral exploration activities on the Yellow Dog Plains, and recent large-scale logging in this area, we feel that the State of Michigan is failing to consider Spruce Grouse habitat requirements (contiguous acreage), since a “forest patch area over 40 ha is important for grouse use...” A recent study concluded “the Yellow Dog Plains has become increasingly fragmented and high quality spruce grouse habitat has decreased and is being replaced by intermediate quality habitat.” ([Habitat Use by Spruce Grouse in a Fragmented System](#), by Laurel A. Hill). Specifically, “grouse use contiguous forest stands averaging 40 ha, and smaller stands of similar habitat are *unused*... I suggest a conservative approach to forest management because spruce grouse on the YDP may not travel to larger residual patches that better support their needs.”

The Parcel Review report includes “Stip 49.” We repeat our concern, raised in previous mineral lease requests, that the implications of Stipulation 49 (surface disturbance limits) are not made clear. Which Stipulation 49 surface-disturbing activities are prohibited or limited? Will there be a meaningful opportunity for additional public comment before the State of Michigan allows shallow down-hole blasting (seismic surveys) to occur, drill pads to be cleared, access roads to be constructed for drilling, or other surface-disturbing activities? Stipulation 49 seems inadequate.

In 2006, the Superior Watershed Partnership (SWP) recommended that the State of Michigan “completely prohibit sulfide-based mining” on the Yellow Dog Plains. “Since the Salmon Trout River and Yellow Dog River are both high quality systems and share a common watershed boundary the SWP recommendation to prohibit sulfide-based mining would hold true for both watersheds,” stated Carl Lindquist, executive director of SWP. “The potential impacts to groundwater, surface water and Lake Superior are simply too great.”³ **Superior Watershed Partnership maintains their objection to sulfide mining and all related mineral exploration activities, and we support their long-held position on this issue.**

Given our specific concerns (T/E species, habitat disruption) and broader environmental concerns (shifting land use threats on the Yellow Dog Plains), we strongly object to the lead reviewer’s decision to “recommend leasing” this specific parcel. Metallic mineral leasing of this land threatens to sacrifice long-term habitat management goals and restoration projects, in order to serve the short-term goals of the mining industry. **This proposed mineral lease does not make sense and should NOT be approved.**

Baraga County Lease Request

The majority of this mineral lease request (8,505 acres) concerns parcels located within Baraga County, which is home to the Keweenaw Bay Indian Community (KBIC). **We are aware of concerns raised by the Keweenaw Bay Indian Community, and we support their comments.**

Additionally, some of the mineral leases requested by Eagle Mine LLC are partly or entirely within lands being considered for inclusion in the National Wild & Scenic River system. This includes parcels T47N, R34W Sections 9, 10, 15, 16, 22, 26, 27, 28, and 35, which fall partly or entirely within the National Wild and Scenic River study area for the Net River. The DNR should defer to this process and deny leases to DNR mineral rights under these lands.

Houghton County Lease Requests

Public Comments by Horst Schmidt

We are concerned that the Michigan DNR is considering leasing parcels to Eagle Mine LLC that are partly or entirely within federally-protected Wild and Scenic River Corridors⁴. Under the Michigan Scenic Rivers

³ <http://bit.ly/1IsGcsN>

⁴ National Wild & Scenic River System. <https://www.rivers.gov/rivers/ontonagon.php>

Act of 1991 (P.L. 102-249), the 29-mile segment of the East Branch of the Ontonagon River “from its origin at Spring Lake to its confluence with an unnamed stream in Section 30, Township 48 North, Range 37 West” is designated as a National Recreational River. From there, the 23-mile segment downstream to the Ottawa National Forest (ONF) Boundary is designated as a National Wild River. The proposed mineral lease request includes parcels in T47N, R36W, Sections 9, 15, 23, 25, 26, 35 and 36 that fall partly or entirely within the protected buffer corridors of the federally-designated National Recreational River segment. This section is protected for its Outstandingly Remarkable Values, including its fish and wildlife populations.

Downstream from these lease requests, the East Branch of the Ontonagon becomes a designated National Wild River, protected for its fish, geologic, scenery, and wildlife values. **If exploration activities or subsequent mining were to be allowed here, how would this river be protected?**

Midway between Highway M-28 and the southern boundary of Houghton County, there are two lakes with lease requests running horizontally across them. Unfortunately, we already have local examples of lakes being poisoned by mining companies. Deer Lake, north of Ishpeming, has been remediated at a cost of millions of dollars, so its mercury contamination is now no worse than most other lakes in the U.P.⁵. While significant progress has been made, the Torch Lake Area of Concern in Houghton County still has not been completely remediated, with its benthic life almost down to zero due to mine tailings covering the bottom and taking up almost a quarter of the lake’s original volume⁶.

These are not hypothetical concerns. As for the ultimate impacts of sulfide mining on rivers, the State of Michigan has allowed Lundin Mining to discharge wastewater from Eagle Mine into a shallow groundwater aquifer feeding springs of the Salmon Trout River; Lundin’s Humboldt Mill discharges wastewater into wetlands of the Escanaba River; and the Aquila Back Forty sulfide mine has been granted a NPDES permit to discharge wastewater into the Menominee River. Most recently, mineral exploration in the Porcupine Mountains Wilderness State Park and surrounding area, including wetlands, old growth forest, and a Scenic Area adjacent to the Presque River, suffered significant sedimentation and disturbance due to Highland Copper’s mineral exploration (drilling) in the spring of 2017.

Aquatic life is highly sensitive to changes in water temperature and chemistry. Mining wastewater discharges change the chemistry and conditions under which aquatic life, the foundation of the river ecosystem, can survive or thrive. The DNR should emphasize the protection of natural resources in their leasing review process.

Iron County Lease Request

We are aware of concerns raised about mineral lease nominations in Iron County, and we support comments made by the Iron River Watershed.

As in Baraga County, some of the leases requested by Eagle Mine LLC. are for lands partly or entirely within the Net River corridor, which is currently a study area, under consideration for inclusion in the National Wild and Scenic River system. This includes parcels within T46N, R34W, Sections 1, 2, 11, 12.

General Comments

Public Comment On 15,000 Acres of State Mineral Lands Proposed Lease, by Jon Saari

⁵ Deer Lake Area of Concern. US Environmental Protection Agency. <https://www.epa.gov/deer-lake-aoc>

⁶ Torch Lake Area of Concern. US Environmental Protection Agency. <https://www.epa.gov/torch-lake-aoc>

Out West, as illustrated in a recent *High Country News* article, old conflicts are re-emerging in the battle between the Obama policies toward mineral leasing and those of the Trump administration. The eight years of the Obama Administration saw efforts made to create large master leasing plans and planning 2.0 schemes to create public input early, so as to avoid objections, protests and lawsuits. Now we are ploughing the same land again.

Where is it appropriate to drill, and where is land better left for recreation, wildlife, grazing, or cultural and scenic values? The Feds have rules that even the hell-bent-on-development Trump administration has had to observe in some national parks. There are well-established “ruts in the road” that almost all recognize. For example, the presence of prehistoric dwellings or archaeological remains will automatically remove certain parcels from lease consideration. Proximity to national monuments, wild and scenic rivers, and wildlife refuges is another consideration.

Where are we in Michigan? Nothing seems to remove a parcel from consideration. Although brief notes are made about individual parcels (T & E species might be listed, Scenic and Wild river status might be noted), has it ever made a difference? Why don't we have a layered system for determining when it is appropriate to drill and when not to drill, and actually stick to it instead of pushing everything down the pipe for the next decision?

Do we still need to know more about our landscape? Don't we know enough to make some elemental decisions about special landscapes, and to not put them at risk? The Upper Peninsula Environmental Coalition has calculated that almost 48 percent of the U.P.'s land mass is, to one degree or another, protected. Most of that is public lands, under federal and state management. Are these public lands truly protected if mineral leasing is allowed without environmental review? We need to protect that percentage, hold that line. Without a master plan and environmental guidelines, Michigan's leasing policy is adrift, serving extractive industries, and only insuring that the protected area will be further eroded as the industrial footprint, little by little, keeps expanding.

Mineral Lease Requests Threaten Protected Rivers

The list of previously classified parcels (posted [here](#)) lists various Michigan DNR's stipulations for the parcels, including those falling within the designated Recreational section of the East Branch of the Ontonagon. Some of these proposed leases are listed as “Development - USDA Forest Service Surface Threatened or Endangered Species Habitat.” The rest are generally listed as “Development - USDA Forest Service Surface Best Management Practices.” What exactly are the “USDA Forest Service Surface Best Management Practices” (undefined within this lease nomination)? Are they sufficiently protective of National Wild and Scenic Rivers? These stipulations also appear to conflict with the Ottawa's 2007 “Wild and Scenic River Comprehensive River Management Plan”, which governs management of these rivers and adjacent lands within the designated buffer zone ⁷.

Regardless of the DNR's stated lease stipulations, many of the requested mineral lease parcels underlie Federal lands with high levels of protection. The designation of this section of the East Branch of the Ontonagon as a “Recreational River” means that development within the river corridor must be severely restricted. In fact, mineral exploration activities appear inconsistent with the land's protective status. **The Ottawa's management plan calls for maintaining all geological features in their natural condition, “free from human defacement, damage, and destruction.” Mineral exploration requires access, but road construction or reconstruction could be permitted only if river values can be *protected and enhanced*.** The ONF Management Plan clearly aims to maintain healthy, primarily mature or old-growth forest communities, and to maintain river segments in a free-flowing condition with a range of flows that provide

⁷ Ottawa National Forest - Wild and Scenic River Comprehensive River Management Plan. July 2007.
<https://www.rivers.gov/documents/plans/north-fork-ottawa-plan.pdf>

optimum conditions for fish, wildlife, natural processes, and channel integrity. Furthermore, the Ottawa National Forest has the responsibility for determining the acceptability of any water resource projects (defined as being a project within the bed and banks of the river) in the designated rivers, regardless of land ownership. Any mining activities must not interfere with the protection and enhancement of river values, water quality, or free-flowing conditions.

Public Trust Responsibilities

According to the Michigan Public Trust doctrine, it's clear that mineral leases are not supposed to be approved without *significant review, a full analysis of alternatives, etc.*⁸ *Where is the DNR's "significant review?" In terms of significant review, parcel reviews make it clear that individual leases are not being reviewed and commented on by all divisions. Where is the "alternatives analysis?"*

"In September 2012, FLOW submitted a Report/Comment to NRC and DNR, setting out the basis for application of public trust and MEPA principles to the NRC and DNR's nomination, auction, classification, and leasing of special and unique state lands, such as state parks, recreation areas, game areas, wildlife management areas, and other conservation lands. In Michigan, two key laws protect the integrity of these lands and waters: (1) the public trust doctrine and (2) the Michigan Environmental Protection Act, Part 17, NREPA, MCL 324.1701 et seq."

Page 7: Under Michigan's 1963 Constitution, all state agencies, including NRC, DNR, and DEQ, have an express duty to protect the state's natural resources. Article 4 § 52 of the Constitution declares: The conservation and development of the natural resources of the state are hereby declared to be of paramount public concern in the interest of the health, safety and general welfare of the people. The legislature shall provide for the protection of the air, water and other natural resources of the state from pollution, impairment and destruction.

We conclude that the proposed mineral leases for parcels falling within the designated Recreational section of the East Branch of the Ontonagon are inconsistent with the ONF Forest Wild and Scenic Rivers Management Plan.⁹ "These values and their immediate environments shall be protected for the benefit and enjoyment of present and future generations."

Land Use Restricted – Subject to the Weeks Act

Numerous parcels fall within the proclamation boundaries of the Ottawa National Forest, under U.S. Forest Service jurisdiction. The Ottawa National Forest was created by purchasing land under the Weeks Act of 1911 (16 U.S.C. 521). Section 11 of the Weeks Act contains specific restrictions regarding development, stating that lands acquired under the Weeks Act are to be "permanently reserved, held, and administered as national forest lands under the provisions of section 471 of this title and acts supplemental to and amendatory thereof", the Forest Reserve Act. **Therefore the majority of these parcels fall under those protections.**

The state's own management goals for protecting this section of the East Branch of the Ontonagon River are contrary to the mineral discovery and extraction goals of the proposed lease. "This segment is designated a Blue Ribbon Trout Stream by MDNR.¹⁰" It supports healthy, self-sustaining populations of brook and brown trout. Migratory steelhead trout and coho salmon spawn upstream from State Highway M-28, as far as Lower Dam. The Comprehensive River Management Plan goes on to state that, "Diverse,

⁸ For the Love of Water (FLOW). 2013. Comment and Recommendations on Law and Policy for State Land Leases within the "Holy Waters" Area of the AuSable River and Manistee River Watersheds.

<http://flowforwater.org/wp-content/uploads/2013/12/2013-12-10-DNR-leasing-comments-Holy-Waters.pdf>

⁹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5110703.pdf

¹⁰ Ottawa National Forest - Wild and Scenic River Comprehensive River Management Plan. July 2007.

<https://www.rivers.gov/documents/plans/north-fork-ottawa-plan.pdf>

self-sustaining populations of both native brook trout and naturalized salmon yield an outstandingly remarkable fishery.”

It would be a refreshing change to mineral leasing policy in this state if DNR staff were able to actually visit these properties and assess their natural values before recommending that they be leased for mineral exploration, and potentially opened to industrial development.

Incomplete Consideration of T/E Habit

We are concerned that no consideration has been given to suitable habitat for the Rusty Patched Bumble Bee (*Bombus affinis*, recently listed as federally Endangered), or the potential for this federally listed species to be found at forested, elevated, and sand plains sites within Michigan’s Upper Peninsula, including several of the lease request areas. *Bombus affinis* does inhabit forest lands, grasslands and sand dunes in Wisconsin, Lower Michigan and Ontario, and the species’ agricultural/chemical threats are less prevalent in the U.P.

We are also concerned that parcels that have stipulations that include “Threatened or Endangered Species Habitat” are being considered, apparently without any consideration of what species may be impacted or even what species are present on these lands.

Conclusion

We strongly urge the Michigan DNR to keep our serious concerns in mind while considering the proposed mineral leases. Some of these state-protected and federally-owned public lands should absolutely not be leased. We believe that the landscape-scale expansion of mineral leasing and exploration is **not** the best or most desirable land use, and the stipulations and restrictions provided are insufficient to protect natural resources. As environmental stakeholders, we have identified several opportunities for *process reform* related to the DNR’s duty to inform the public of proposed Mineral Leases, and better safeguard the Public Trust.

Specific Requests:

- We strongly urge the Department of Natural Resources to **deny** the mineral lease sought by Eagle Mine LLC for 40 acres of State-owned land on the Yellow Dog Plains (T50N R28W, Marquette County).
- For parcels having stipulations of “Threatened or Endangered Species Habitat”, The DNR should consult its own records, the Michigan Natural Features Inventory database, and/or the Ottawa National Forest data to find out what state- or federally-list rare species are known to occur on these lands. The DNR should then consider whether mineral exploration on these lands has a significant chance of damaging or destroying any existing populations of these species. If so, the mineral rights beneath these parcels should NOT be leased for mineral exploration. Additionally, all of these parcels should be reconsidered in terms of the potential impacts to critical habitat for newly listed Endangered species, such as the Northern Long-Eared Bat (and protection of hibernacula) and the Rusty Patched Bumble Bee.
- **For mineral leases within the Wild and Scenic corridor of the Ontonagon River, we recommend no mineral leases be issued** (deferring to federal protection of surface resources). These include parcels in T47N, R36W, Sections 9, 15, 23, 25, 26, 35 and 36.
- Downstream from these lease requests, the East Branch of the Ontonagon becomes a designated National Wild River. If leases are considered, they must be re-evaluated in terms of the federal restriction of “1/4 mi on each side of designated Wild and Scenic and Recreational rivers. Land within this corridor has special protection. Strongest protection is for for Wild Rivers,

where federal mineral rights are withdrawn. Water quality within this segment is also strictly protected.

- **We strongly object to the proposed mineral leases that are partly or entirely within lands being considered for inclusion in the National Wild & Scenic River system.** This includes parcels T47N, R34W Sections 9, 10, 15, 16, 22, 26, 27, 28, and 35, which fall partly or entirely within the National Wild and Scenic River study area for the Net River. We ask that the DNR defer to the federal study process and deny leases to mineral rights under these lands.
- The DNR should consult with its own biologists and with Ottawa National Forest biologists and land managers before leasing any of the other parcels under these public lands.
- Land management plans for forest units on state lands in these counties should be updated to accurately reflect the widening threats of mineral exploration and changing land use.

In closing, we repeat the statement made by the DNR's Brian Roell, concerning the unexamined cumulative impacts of mineral leasing and the fact that "present and anticipated increase of mining exploration activity in this area could individually and/or cumulatively adversely impact the long-term viability of various wildlife populations in this region."¹¹ When and how will the DNR tally the cumulative environmental impacts of these pending mineral lease decisions? In our opinion, leasing decisions are made in a predictable and piecemeal fashion, disregarding obvious trends and cumulative impacts to natural resources. The current proposal to lease more than 15,000 acres of State forest land to a single mining company is staggeringly short-sighted, and if approved will further undermine our Public Lands and jeopardize Michigan's long-term stewardship of public forest land, public access, clean water, sustainable forestry, and protective management of Michigan's wildlife and fisheries. **ALL of the proposed leases should be re-examined with an eye to the protection of wild lands, wild rivers, scientific study sites, and critical habitat, both known and potential, necessary for threatened and endangered species.**

Thank you for fully considering our comments and recommendations.

Submitted,

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<https://www.rivers.gov/documents/plans/north-fork-ottawa-plan.pdf>

¹¹ <https://drive.google.com/open?id=0BwDqaes6rJxSYWVmX0ppTGIOLXJyQV9IdHJCyXFydFRKRE5F>