



January 12, 2021

Honorable John Horgan
 Premier
 PO Box 9041 STN PROV GOVT
 Victoria, BC V8W 9E1

RE: Logging and mining threats to the Silverdaisy Area in the “donut hole” between Manning and Skagit Provincial Parks in the Skagit Headwaters

Dear Premier Horgan:

The 109 undersigned conservation, recreation and wildlife organizations as well as tribes, local businesses, elected officials, and other concerned interests representing Washington State are writing to express our strong opposition to the mineral exploration permit in the Silverdaisy Area submitted by Imperial Metals that is currently pending before the Ministry of Energy, Mines & Petroleum Resources.

We were happy to hear the announcement from former Minister of Forests, Lands Natural Resource Operations, and Rural Development Doug Donaldson and returning Minister of Environment and Climate Change Strategy George

Heyman one year ago halting the clearcut logging sales in the Skagit Headwaters in direct response to opposition from Canada and downstream residents in Washington State. He released the following statement:

“Effective immediately, BC Timber Sales will no longer award timber licenses in the Silverdaisy area, ensuring no additional commercial forest harvesting occurs in that area. “We’ve heard loud and clear from individuals and groups on both sides of the border that logging should stop in the Silverdaisy, and we’re making sure that commercial timber harvesting in that area does not continue.”

We have also not heard any news as to a decision on the mining permit in the same area from Imperial Metals.

We understand that as a result of the recent election, there are several new ministers in key offices that will be important to resolving the pending mining permit from Imperial Metal’s Giant Copper project and ensuring that the “donut hole” area in the Skagit Headwaters continues to be under a moratorium for logging and hopefully gains permanent protection.

Importance of the Skagit River and Basin

The Skagit River flows south from British Columbia through Washington State through North Cascades National Park and Mt. Baker Snoqualmie National Forest before flowing into the Puget Sound. The proposed mining activities and potential future development of a mine in the Canadian Skagit headwaters provides a real and significant threat to many of the values connected to the Skagit River and watershed in Washington State.

The Skagit Watershed supports large, diverse fish and wildlife populations and provides over 30 percent of the freshwater flowing into Puget Sound. It also provides critical habitat for imperiled species such as bull trout, grizzly bears, and spotted owls. The Skagit River supports the largest populations of threatened steelhead and Chinook salmon in the Puget Sound, and the largest run of chum salmon in the conterminous US. Approximately, 90 percent of the bull trout from Ross Lake spawn in the Upper Skagit downstream of the proposed activities.

These fish are a critical food resource for the imperiled Southern Resident Killer Whales and are central to the culture and integrity of several Tribes both in the United States and Canada who have treaty rights to these important resources. The greater Skagit delta is a site of global importance for migratory birds in the Pacific Flyway, supporting significant concentrations of waterfowl and shorebirds.

Inconsistency with International Treaty Obligations

As you should be aware, the 1984 High Ross Treaty between the United States and Canada resolved the dispute over raising Seattle’s High Ross Dam and avoided flooding part of the Upper Skagit Watershed. Recognizing the unique ecological and recreational values of the Skagit Watershed, one of the main purposes of the Treaty was to maintain the environmental integrity of the Watershed. The City of Seattle and the BC government signed the accompanying Agreement.

Furthermore, the Treaty also created the Skagit Environmental Endowment Commission (SEEC) to administer this collaborative partnership, the Commissioners of which are appointed by the Premier and the Mayor. The governments together established SEEC’s primary mission: (1) to conserve and protect wilderness and wildlife habitat; (2) to enhance recreation opportunities in the Skagit; and (3) to acquire mineral or timber rights consistent with conservation and recreational objectives.

The proposed activities are in the “donut hole”, an area encircled by Skagit Valley and Manning Provincial Parks, that was left out of the parks due to existing mineral claims. Consistent with its purpose, the SEEC has been actively pursuing retirement of these claims in order to protect and incorporate the donut hole into one of the adjacent parks. This has been done with the knowledge and encouragement of the BC government. Logging and mining in the donut hole conflicts with the intent and the efforts made thus far to protect this area and incorporate it into the surrounding parkland.

Neither the previously allowed logging activities nor this latest mineral exploration permit proposal are in alignment or in keeping with the spirit and intent of the Treaty. The proposed mineral exploration activities including creating access roads and trails, conducting surface exploration drilling with associated water supply and catchment sumps, and mechanical trenching over a five-year period of continued disturbance are wholly unacceptable. The area that Imperial Metals is proposing to investigate has already been searched many times before as documented in your records. In addition, the Skagit Environmental Endowment Commission has paid for an assessment of the proposed Giant Copper mine indicating that the mine would not be economically viable.

Potential Impacts from Mining Activity on Down Stream Values in the Skagit Watershed

Logging and mining are well known to increase sediment, water temperatures, and threats of contaminants in downstream areas which would impact this and other aquatic species downstream. Even exploratory drilling has been shown to release copper. Copper can be lethal to fish and aquatic invertebrates at relatively small concentrations. Recent studies have found that copper has substantial sublethal impacts to fish at levels that were previously considered safe. This sensitivity is greatest where water quality is excellent. Given that Ross Lake supports one of the largest populations of bull trout, listed under the Endangered Species Act and the Skagit River supports the largest Chinook population in Puget Sound, no mining activity in the donut hole should be permitted.

Unacceptable Record of Responsibility and Accountability of Imperial Metals

In addition to the unacceptable impacts to fish, wildlife and water resources downstream and violation of an international treaty, there is great concern over the past record of Imperial Metals with respect to compliance safety and accountability. Their permit applicant's record is poor considering the August 2014 Mount Polley mine tailings pond spill which was one of the largest environmental disasters in Canadian history.

The failed tailings dam forced 24 million cubic meters of mine waste, containing mercury, arsenic, selenium, copper, and other heavy metals over 12 hours into Hazeltine Creek. The contaminated mine waste ultimately entered Quesnel Lake—the source of drinking water for residents of Likely, BC, and home to about a quarter of the province's sockeye salmon population.

Background for New Members Ministers in the British Columbia Government

Please share this letter with following Ministers of the British Columbia government (all but one of which is new):

- Minister of Environment and Climate Change Strategy George Heyman – Minister Heyman is returning to his post and is well educated on the logging and mining threats. We were encouraged to see the following point in his mandate letter which seems relevant and applicable to the transboundary Skagit Watershed: “Support the Minister of State for Lands and Resource Operations’ work with neighboring jurisdictions to cooperatively develop and invest in new strategies aimed at better protecting our shared wildlife and habitat corridors, including work to implement the Together for Wildlife Strategy.”
- Minister of Forests, Lands, Natural Resource Operations and Rural Development Katrine Conroy – This is a key post for the pending mining permit from Imperial Metals. We were encouraged to see the following bullet in her mandate letter: “Support the Minister of State for Lands and Natural Resource Operations to create a new Ministry for Lands and Natural Resource Operations that will develop and implement land use policies that support B.C.’s goals for economic activity, environmental sustainability, and reconciliation with Indigenous peoples.” Furthermore, we hope to hear a confirmation that the halt to logging in the “donut hole” will continue under the new Minister’s administration.
- Minister of Energy, Mines and Low Carbon Innovation Bruce Ralston – There is significant concern about Imperial Metals’ reputation after the Mount Polley Mining disaster resulted in economic and ecological impacts in the Fraser River Watershed. We were encouraged to see the following bullet in his mandate letter: “Support the Minister of Environment and Climate Change Strategy to ensure owners of large industrial projects are bonded moving forward so that they – not B.C. taxpayers – pay the full costs of environmental cleanup if their projects are abandoned.”
- Minister of State for Lands and Natural Resource Operations Nathan Cullen - We were encouraged to see the following bullet in his mandate letter: “In collaboration with Indigenous partners, communities and stakeholders

continue to modernize land-use planning for B.C.'s ecosystems, rivers, lakes, forests and provincial public land and waters."

- Minister of Indigenous Relations and Reconciliation Murray Rankin - Several First Nations organizations have weighed in opposing the Giant Copper mining permit including the Neskonlith Indian Band, Upper Similkameen Indian Band, Union of British Columbia Indian Chiefs and First Nations Women Advocating for Responsible Mining. We were encouraged to see the following bullet in his mandate letter: "Facilitate partnership with First Nations around key decisions on regional land and resource use allocation through evolving shared decision making, building on the *Declaration on the Rights of Indigenous Peoples Act*, to provide a clear, stable and sustainable path for everyone to work together."

In conclusion, we urge you to work with your new Ministers to deny the proposed mining permit by Imperial Metals and move forward with efforts to facilitate the purchase of the mineral tenures and provide long term protection for the Skagit headwaters consistent with the High Ross Treaty.

Additionally, we expect to see the vision and promise of the High Ross Treaty between the United States and Canada implemented by the US/Canada Skagit Environmental Endowment Commission be realized through pursuing the protection of the remaining unprotected area of the trans-boundary Skagit watershed (i.e., the donut hole). Acquiring mineral and timber rights in the watershed is a key part of SEEC's charter and mission. This would establish a conservation legacy that would be remembered for decades on both sides of the border.

Sincerely,

Liz Lovelett
Senator, LD-40
Washington State Legislature

Rud Browne
Councilmember, District 1
Whatcom County Council

Jesse Salomon
Senator, LD-32
Washington State Senate

Megan Dunn
Councilmember, District 2
Snohomish County

Alex Ramel
Representative, LD-40
Washington State Legislature

Teresa Mosqueda
City Councilmember
City of Seattle

David Paul
Representative, LD-10
Washington State Legislature

Kshama Sawant
City Councilmember
City of Seattle

Emily Wicks
Representative, LD-38
Washington State Representative

Dan Strauss
City Councilmember
City of Seattle

Debra Lekanoff
Representative, LD-40
Washington State Legislature

Debora Juarez
City Councilmember
City of Seattle

M. Lorena González
City Councilmember/President
City of Seattle

Richard Brocksmith
City Councilmember At-Large
Mount Vernon

Lisa Herbold
City Councilmember
City of Seattle

Karl de Jong
City Councilmember
Sedro-Woolley

Pinky Vargas
Mayor Pro Tem, Ward 4
City of Bellingham

Lisa A. Anderson
City Councilor, Ward 5
City of Bellingham

Daniel Hammill
City Councilor, Ward 3
City of Bellingham

Michael Lilliquist
Representative, Ward 6
City of Bellingham

Tom DeBoer
Chief Environmental Affairs Officer
Seattle City Light

Tom Uniack
Executive Director
Washington Wild

Kurt Beardslee
Executive Director
Wild Fish Conservancy

Tele Aadsen & Joel Brady-Power
Co-owners
Nerka Sea Frozen Salmon (Bellingham)

Robert Kaye
Chair, Conservation Committee
North Cascades Audubon Society (Bellingham)

Pamela Brulotte
Founder
Icicle Brewing Company/München Haus

Jack Guinn
Owner
Hellbent Brewing Company

Craig Nobley
General Manager
Lighthouse Roasters

Brad Throssell
State Chair
Washington Council of Trout Unlimited

Wendy McDermott
Director, Rivers of Puget Sound & Columbia Basin
American Rivers

Levi Wyatt
Corporate Social Responsibility Coordinator
Yakima Chief Hops

Rev. Roberta Rominger
Pastor
Congregational Church on Mercer Island, WA

Mark Taylor
President
Three Rivers Chapter of Trout Unlimited

Michelle Connor
President & CEO
Forterra NW

Rob Smith
Northwest Regional Director
National Parks Conservation Association

Raymond Kwan & Barry Chan
Owners
Lucky Envelope Brewing

Kim McDonald
President
Fish Not Gold

Marlies Wierenga
Pacific Northwest Conservation Manager
WildEarth Guardians

Jack Lamb
CEO/Owner
Aslan Brewing Co.

Joseph Bogaard
Executive Director
Save Our wild Salmon Coalition

J. Michelle Swope
Washington Regional Coordinator
Native Fish Society

Sarah Kliegman
co-Executive Director
Okanogan Highlands Alliance

Allen Gibbs
Vice President
Pilchuck Audubon Society

Matt Moore
President
Northwest Fly Anglers

Lara Zahaba
Co-Owner | Marketing & Communications
Stoup Brewing

Becca Gray and Nate Schons
Owners
Island Hoppin' Brewery (Orcas Island)

Haley Keller
Co-Owner, Finance & Retail Operations
Peddler Brewing Company

Andrew Pogue
Owner
Fair Isle Brewing

Saul Weisberg
Executive Director
North Cascades Institute (Sedro-Woolley, WA)

Amy Brockhaus
Deputy Director
Mountains to Sound Greenway Trust

Phil Fenner
President
North Cascades Conservation Council

Tony Ridgeway
Board President
Flying Bike Cooperative Brewery

Taylor Robertson
Marketing & Sales Director
Werner Paddles

Amy Grondin & Greg Friedrichs
Co-owners
Duna Fisheries, LLC

Donna Osseward
President
Olympic Park Associates

Tim Manns
Conservation Chair
Skagit Audubon Society

Molly Doran
Executive Director
Skagit Land Trust

Gabe Epperson
Executive Director
Whatcom Land Trust

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater

Kelsey, Ben, Liz & Craig Curran
Owners
Watershed Pub & Kitchen

Jennie Goldberg
Director
League of Northwest Whitewater Racers

Art Wolfe
Conservation Photographer
Art Wolfe, Inc.

Mike Murphy & Colin Lenfesty
Owners
Holy Mountain Brewing Co.

Harry Romberg
National Forest Committee Chair
Sierra Club- Washington Chapter

Connie Miller
Store Manager
Patagonia Seattle

Meghan Wolf
Environmental Activism Manager
Patagonia

Derek Wyckoff
Owner/CEO
192 Brewing Company

Richard Brocksmith
Executive Director
Skagit Watershed Council

Lee First
Waterkeeper
Twin Harbors Waterkeeper

John McGlenn
President
Washington Wildlife Federation

Mari & Will Kemper
Owners
Chuckanut Brewing Co (Bellingham)

Dave Green
President, CEO
Skagit Valley Malting

Tom Glade
Board of Directors
Evergreen Islands

Mark Burr
General Manager/Founder
Jellyfish Brewing Company

Paul Satzinger
Operations Manager
NOLS Pacific Northwest

LeeAnne Beres
Executive Director
Earth Ministry

Lisa Remlinger
Chief Policy Officer
WA Environmental Council/WA Conservation Voters

Trish Rolfe
Executive Director
Center for Environmental Law & Policy

Robert Bowman
Co-Owner/Founder
Black Raven Brewing

Peter Bahls
Executive Director
Northwest Watershed Institute

Jack Pflueger
Owner
Stones Throw Brewery

David Skiba
Owner/Head Brewer
No Boat Brewing Company

Anne Hall
Pastor
Lutheran Church in the San Juans

Marie Neumiller
Executive Director
Inland Northwest Wildlife Council

Shannon Wright
Executive Director
RE Sources

Troy Emmons
District Manager
Hopworks Urban Brewery

Cecilia Vollert
Brand Manager
MiiR

Justin Gerardy
Owner
Standard Brewing/ Sovereign Brewing

Andrée Hurley
Executive Director
Washington Water Trails

Colleen Kuehl
Owner
Wander Brewing

Deborah B Jensen, PhD
Vice President and Executive Director
Audubon Washington

Zac Olson
Manager
Dru Bru

Megan Birzell
Washington State Director
The Wilderness Society

Ron Swarner
Owner
Peaks & Pints Craft Beer Bar/Bottle Shop

Jasmine Minbashian
Executive Director
Methow Valley Citizens Council

Greg Haller
Executive Director
Pacific Rivers

Nina Bell, J.D.
Executive Director
Northwest Environmental Advocates

Sara Nelson
Owner
Fremont Brewing Company

Kyle Fitzsimmons
General Manager
Elysian Brewing

Steve Jones
President
WA State Council of Fly Fishers International

Kevin Watson
Owner
Future Primitive Brewing Co

Rich Simms
President
Wild Steelhead Coalition

Larry Lober
Membership Coordinator
Greater Bellingham Running Club

Robert Brenlin
Owner
Latona Pub/Hopvine/Fiddler's Inn

CC: BC Minister of Environment and Climate Change Strategy George Heyman
BC Minister of Forests, Lands, Natural Resource Operations and Rural Development Katrine Conroy
BC Minister of Energy, Mines and Low Carbon Innovation Bruce Ralston
BC Minister of State for Lands and Natural Resource Operations Nathan
BC Minister of Indigenous Relations and Reconciliation Murray Rankin
US Senator Maria Cantwell
US Senator Patty Murray
US Representative Suzan DelBene
US Representative Rick Larson
WA Governor Jay Inslee