



December 21, 2018

Mr. Quigcen Cai
 RPF, Planning Forester
 BC Timber Sales
 46360 Airport Road
 Chilliwack, BC V2P 1A5

RE: Comments on BC Timber Sales Proposed Forest Development Operation Plan No. 643-3

Dear RPF Cai:

In response to your October 12 solicitation for comments on the subject operation plan, the undersigned conservation, recreation and wildlife organizations are writing to express and reinforce our strong opposition to British Columbia Timber Sales (BCTS) proposed block and road development in the Upper Skagit River drainage (Silverdaisy and Twenty-Six Mile Creeks). 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.

As you are probably 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.

Since learning of the logging, you may also be aware that the City of Seattle requested the immediate suspension of further planning and on-the-ground activities in the Silverdaisy Area in a letter from Seattle Mayor Durkan to Premier Horgan on August 2, 2018. A call is now being scheduled for the Mayor and the Premier to discuss this matter in an effort to reach alignment and honor the spirit and intent of the Treaty. It is essential that all planning for and active logging in the Silverdaisy area now cease in respect of this coming discussion between the two involved governments.

On September 27, we sent a letter expressing our opposition to logging activities in the Upper Skagit Watershed to Mayor Durkan and Premier Horgan. This letter listed and described the specific issues we have

with such activities and our issues and concerns still stand. Consistent with our issues our comments on the subject operating plan are as follows:

- The proposed logging is inconsistent with the spirit and intent of the 1984 High Ross Treaty between the United States and Canada High Ross Treaty and the concurrent Agreement signed by the City of Seattle and British Columbia and should thus be halted permanently.
- The proposed logging contradicts one of the main purposes of the Treaty to maintain the ecological integrity of the Upper Skagit Watershed. 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. Approximately, 90 percent of bull trout spawn in the Upper Skagit downstream of the proposed logging. Such logging is well known to increase sediment and water temperatures of downstream areas which would impact this and other aquatic species downstream.
- The proposed logging includes portions of the “donut hole”, an area encircled by Skagit 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 acquisition 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 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.
- 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. 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.

Finally, we urge BCTS to permanently halt all logging plans, including road building, in the Upper Skagit drainages and change the designation of these areas from working forest to protected wilderness.

Sincerely,

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CC: Washington Governor Jay Inslee
Senator Patty Murray (D-WA)
Senator Maria Cantwell (D-WA)
Congresswoman Suzan DelBene (D-WA01)
Seattle Mayor Jenny Durkan