



October 12, 2016

Todd Griffin, Project Lead
 Mt. Baker Snoqualmie National Forest
 810 State Route 20
 Sedro-Wooley, WA 98284
 Submitted electronically to: toddgriffin@fs.fed.us

Re: Scoping Comments for proposed Plan of Operations to expand the Swen Larsen Quarry.

Dear Mr. Griffin:

On behalf of the 19 undersigned organizations and the tens of thousands of forest users, Washington residents and federal taxpayers who they represent, we are writing to identify items that need to be included in the environmental analysis for the proposed Plan of Operations submitted by United Western Supply.

We recognize that mining and mineral extraction is an allowable use of certain federal lands and we acknowledge the necessity of some industrial activities to support our contemporary society and economy. However, we also feel strongly that such activities are not appropriate everywhere or at any cost.

The Mt. Baker West Roadless Area, located north of the Twin Sisters in which the proposed expansion would take place, includes intact old-growth forest that serve as part of the municipal watershed for the City of Bellingham. The removal of the surface forest, vegetation and soils raises potential water quality concerns for residents and local businesses.

Furthermore the broader Mt. Baker West Roadless Area and Middle Fork Nooksack Road corridor are local destination for recreational opportunities including climbing, horseback riding, hiking, paddling and other activities. The mine lies just to the north of the Twin Sisters, two popular summits on the western edge of Mt. Baker-Snoqualmie National Forest. While mine expansion would not directly impact access to the recreational resources in the area, it does pose significant environmental impact to this landscape and viewsheds that are important to the hiking, scrambling, and climbing experiences in this area.

The following issues should be considered and analyzed as part of any future environmental analysis:

I. Level of NEPA Analysis is Not Indicated

The scoping notice does not indicate the level of NEPA analysis proposed for this project. We feel strongly that based on the significant impact to surface resources from quarry activities that this should not fall under a

categorical exclusion. This project merits either an Environmental Assessment or Environmental Impact Statement level of NEPA review.

II. Unanswered Questions About Past Expansion of Project onto Federal Lands

The scoping notice provides a brief background on the Swen Larsen Quarry, indicating that it has been in operation since 1963 and currently occupies both private and federal lands currently. Based on correspondence with the Mt. Baker Snoqualmie National Forest, our understanding is that about 10 acres of federal land is included in the current quarry boundary.

On October 20, 2008 a scoping notice was released proposing building a temporary road onto federal lands within the Mt. Baker West Inventoried Roadless Area to construct several exploratory drill pads. To our knowledge this proposal was abandoned and no authorization for these activities was granted by the agency.

From satellite photos taken in 2010 (Figure 1) it appears that by this date, little intrusion from the quarry has occurred onto federal lands and the inventoried roadless area. However a 2016 satellite photo (Figure 2) shows considerable development within the federal roadless area. The hard-to-read map provided with the scoping notice seems to follow the impact area in the 2016 satellite photo as the current boundary of the quarry.

We are not clear what public process called for or authorized the expansion of the quarry into the federal inventoried roadless area that occurred between 2010 and 2016. The public process and authorization for the previous expansion should be detailed in the draft environmental assessment.



Figure 1: 2010 Satellite Image of Swen Larsen Quarry



Figure 2: 2016 Satellite Image of Swen Larsen Quarry

III. Provide a More Readable Map of the Proposed Expansion

The map provided with the scoping notice is confusing. While the roadless area is clearly marked, the existing and the proposed expansion areas are poorly marked. The average reader of this map will likely not be able to discern the existing versus the proposed expansion of the quarry. Please use solid borders to delineate each of these areas. We assume that the shading identified for the proposed expansion is erroneously applied to the entire inventoried roadless area.

IV. Impacts to Eligible Wild and Scenic Rivers

The area of the proposed expansion includes intact forests including streams that drain clean, cold water into the Middle Fork Nooksack River. The Middle Fork Nooksack River was found eligible for Wild and Scenic River Designation as part of the 1990 Mount Baker Snoqualmie National Forest Plan. The “outstandingly remarkable value” for this river includes wildlife (i.e., elk, mountain goats).

The US Forest Service Handbook,¹ states as follows:

To the extent the Forest Service is authorized by statute, a Responsible Official may authorize site-specific projects and activities on NFS lands within river corridors eligible or suitable only where the project and activities are consistent with all of the following:

- 1. The free-flowing character of the identified river is not modified by the construction or development of stream impoundments, diversions, or other water resources projects.*
- 2. Outstandingly remarkable values of the identified river area are protected.*

The proposed action and future development and expansion of the mine could impact the river’s values that the Forest Service is obligated to protect.

V. Impacts to Fisheries on the Middle Fork Nooksack

The Nooksack River system supports significant fisheries habitat including coastal cutthroat trout, steelhead, rainbow trout, Dolly Varden, bull trout, and Chinook, coho, chum, pink and sockeye salmon. Of these, Chinook salmon and bull trout are listed as Threatened under the Endangered Species Act. Due to a manmade barrier to upstream migration in the Middle Fork Nooksack River (the City of Bellingham Water Supply Diversion) only resident rainbow trout, cutthroat trout, and bull trout occur within the Middle Fork portion of the analysis area. NOAA fisheries recently designated the Middle Fork Nooksack River up to Ridley Creek as Critical Habitat for Chinook Salmon.

Impacts from the quarry expansion including sedimentation, water temperature variations and increase in minerals or released toxins could be a concern for fishery health and habitat in the Middle Fork Nooksack River.

VI. Impacts to Wildlife

The area proposed for expansion also has value for a number of imperiled wildlife species. The area in question is mature and old growth forest habitat that may be suitable for northern spotted owl and marbled murrelet. The north ridges of the Twin Sisters range extending beyond the Mt. Baker Wilderness has been identified as important habitat for mountain goat populations. The environmental analysis should identify any potential impacts to federally or state listed species.

¹ Section 1909.12, Chapter 80

VII. Impacts to Inventoried Roadless Area

The proposed quarry expansion would include nearly 10 acres of the Mt. Baker West Inventoried Roadless Area. This area of intact old-growth forest is protected by the 2001 National Forest Roadless Area Rule from new road construction. It is not clear from the scoping notice whether the proposed Plan of Operations includes any road access within the inventoried roadless area but given the nature of hauling and excavation involved in a quarry expansion it seems reasonable to assume that new roads will be constructed. New road construction would violate the Roadless Rule. The environmental analysis should specifically identify any and all roads (including temporary roads) that would be constructed or utilized within the inventoried roadless area.

VIII. Impacts to City of Bellingham Municipal Watershed

There are significant concerns about impacts to the quality of water within the Middle Fork Nooksack River, which serves as a source of the safe and clean drinking water supply for more than 85,000 residents of the City of Bellingham.

As stated on the City of Bellingham website:

The City of Bellingham operates a water diversion dam on the upper reaches of the Middle Fork Nooksack River approximately 20 miles east of the city of Bellingham, at an elevation of approximately 838 feet above sea level. The City has used the diversion dam since 1962 to divert water from the Middle Fork into its water supply system. From the river, the water flows through a tunnel and pipe into Mirror Lake and then into Anderson Creek, which empties into Lake Whatcom. The lake is the drinking water reservoir for over 85,000 City and County residents.

The environmental analysis should look closely at the impacts of sedimentation and releasing of minerals and elements that could be harmful or costly to the drinking water supply.

We appreciate the opportunity to give substantive comments to this scoping public comment period. Feel free to contact Tom Uniack, Executive Director for Washington Wild directly, or on behalf of the undersigned organizations, at 206-633-1992 or tom@wawild.org.

Sincerely,

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