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305 N. 83<sup>rd</sup> Street  
Seattle, WA 98103  
206-633-1992  
[www.wawild.org](http://www.wawild.org)  
[info@wawild.org](mailto:info@wawild.org)

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Michael C. Liu  
Methow Valley District Ranger  
US Forest Service  
24 West Chewuch Rd  
Winthrop, WA 98862

*Submitted electronically to: [comments-pacificnorthwest-okanogan-methowvalley@fs.fed.us](mailto:comments-pacificnorthwest-okanogan-methowvalley@fs.fed.us)*

**Re: Scoping Comments for the Environmental Analysis for submitted Plan of Operations for Exploratory Drilling near Flag Mountain on the Methow Valley Ranger District**

Dear Mr. Liu:

On behalf of the 10,000 members and supporters statewide represented by Washington Wild, we are writing to identify items that need to be included in the environmental analysis for the proposed Plan of Operations submitted by the Discovery Consultants.

We recognize that mining and mineral extraction is a legitimate use of certain Federal lands and we acknowledge the necessity of some industrial activities to support our contemporary society and economy. However, we also strongly feel that such activities are not appropriate everywhere or at any cost. Additionally, it is well known that mining can have serious environmental impacts to streams, rivers and groundwater resources as well as associated health impacts to local communities.

We have a number of concerns that we feel need to be studied and analyzed as required by the National Environmental Policy Act. They include:

**I. An Environmental Assessment Is Needed for This Project**

The scoping letter proposes that the exploratory drilling proposal be handled with a categorical Exclusion (CE) under the National Environmental Policy Act. While we recognize that CEs can be appropriate in specific situations, these tend to be in cases where there is extensive collaboration by broad stakeholders, for example as part of a timber collaborative. The current Plan of Operation does not meet that criterion in our eyes.

Additionally, exploratory drilling can result in significant impacts to surface and groundwater resources based on pollution from drill lubrication. At least three municipalities, Winthrop, Twisp and Pateros rely on the Methow River basin (the majority of which is owned by the federal government and managed by the U.S. Forest Service) for their source of clean and safe

drinking water. These potential impacts are significant and deserve the level of analysis of an environmental assessment.

We have commented and been involved in similar exploratory drilling projects managed by the Forest Service and have found each of them to have a minimal level of environmental analysis to be and environmental assessment. The proposed exploratory drilling managed by the Gifford Pinchot National Forest for activities related to developing the a potential mine near Mt. St. Helens at Goat Mountain required an environmental assessment. Recent proposals managed by the Mt-Baker Snoqualmie National Forest to develop road access to the Excelsior mine in the Mt Baker Ranger District and identify a consent-to-lease for geothermal exploratory drilling in the Skykomish Ranger District both required environmental assessments.

## **II. Management Obligations Related to a Suitable Wild and Scenic River**

The area near Flagg Mountain proposed for exploratory drilling sits within the Methow River watershed. The Methow River was found suitable and recommended for designation under the Wild and Scenic Rivers Act as part of the Land and Resource Management Plan for the Okanogan National Forest.<sup>1</sup> The Outstandingly Remarkable Values identified for this river were scenic, wildlife, fish and recreation.

The current Proposed Action for the Wenatchee-Okanogan National Forest (2011) retains the six rivers identified as suitable for designation in the 1989 Land and Resource Management Plan for the Okanogan National Forest, including the Methow River. It makes clear that these rivers need to be managed to preserve their outstandingly remarkable values within and beyond the ¼ mile corridor:

*“Eligible or suitable rivers are managed to preserve their eligibility. The river corridor is generally one-quarter mile from either side of the riverbank. However, protection of outstandingly remarkable values may require encompassing a larger area.”*

More broadly the US Forest Service Handbook,<sup>2</sup> 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 of exploratory drilling and future development of the mine could impact the river values the Forest Service is obligated to protect. The Methow River provides important scenic vistas, important wildlife habitat for mountain goats and mule deer, habitat for spring Chinook and summer steelhead, and recreational opportunities within the river corridor for

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<sup>1</sup> Land and Resource Management Plan for the Okanogan National Forest, Appendix G, Wild and Scenic Rivers, Pages G5-G13. 1989.

<sup>2</sup> Section 1909.12, Chapter 80

boating, cross country skiing, mountain biking, climbing, and hiking. Exploratory drilling and future development has the potential to affect these potential river values.

### **III. Management Obligations Related to Late Successional Reserves**

The area being considered for development is designated as a Late Successional Reserve (LSR) under the Northwest Forest Plan (as amended to the current forest plan). Under the Northwest Forest Plan, these areas “are to be managed to protect and enhance conditions of late-successional and old-growth forest ecosystems...”<sup>3</sup> Regarding Multiple Use Activities, the Standards and Guidelines state that “Road construction in Late-Successional Reserves for silvicultural, salvage and other activities generally is not recommended...”<sup>4</sup> An Environmental Assessment should make clear any overlap or proximity to LSRs to the project area and should justify any road construction or maintenance activities within such an area.

While we are well aware that the Proposed Action for the Wenatchee-Okanogan National Forest Plan Revision has proposed changing the Late Successional Reserve land allocations, it should be clear that the draft plan has not yet been released and that provision will be one of the more controversial aspects of the draft plan. Until a final plan is approved (probably in 2015 or later) there should not be an assumption that the current management obligations of the agency around late successional reserves can be ignored. An environmental assessment should address potential impacts on this important area.

### **III. Management Obligations Related to Aquatic Conservation Strategy & Riparian Reserve**

Part of the area of proposed activity is likely within a Riparian Reserve area (as established by the Northwest Forest Plan and amendment to the current forest plan), which by definition is meant to “confer benefits to riparian dependent and associated species other than fish, enhance habitat conservation for organisms that are dependent on the transition zone between upslope and riparian areas, improve travel and dispersal corridors for many terrestrial animals and plants, and provide for greater connectivity of the watershed. The Riparian Reserves will also serve as connectivity corridors among the Late-Successional Reserves.”<sup>5</sup> It is necessary that any management action in such an area be evaluated for consistency with the Aquatic Conservation Strategy. An environmental assessment should address potential impacts on this sensitive area.

### **IV. Establishment of New and Temporary Roads**

The prospect of developing new or temporary roads is a concern with respect to environmental impacts and wildlife considerations. An environmental assessment should take into account the ongoing sustainable roads analysis that is being conducted by the Forest under Subpart A of the Travel Management Rule.<sup>6</sup> At a time when the agency is trying to grapple with an \$8 billion road

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<sup>3</sup> Standards and Guidelines Attachment C to the 1994 ROD; p.C-11

<sup>4</sup> Standards and Guidelines Attachment C to the 1994 ROD; p C-16

<sup>5</sup> Standards and Guidelines Attachment B to the 1994 ROD; p.B-13

<sup>6</sup> 36 CFR § 212.5

maintenance backlog by “right-sizing” the road system, building new or temporary roads needs justification. An Environmental Assessment would provide the information needed to make a sound decision on the proposed Plan of Operations.

We appreciate the opportunity to give scoping comments and hope there will be an opportunity to review an environmental assessment for this project.

Sincerely,

Tom Uniack  
Conservation Director  
Washington Wild