

Methow Conservancy



Board of Directors

November 3, 2017

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Okanogan-Wenatchee National Forest

215 Melody Lane

Peter Bauer

Wenatchee, WA 98801

Phil Davis

Re: Scoping Comments; Methow Headwaters Protection Act of 2017 (S.566)

Mary Drobka

Dear Supervisor Williams,

Jane Gilbertsen

Sam Naney

Peggy Porter

Gordy Reynaud

Stephanie Stewart

Thank you for providing this opportunity to submit public comment to inform your agency's environmental review process associated with the 20-year mineral withdrawal requested by the Forest Service for the 340,079 acre Methow Headwaters area. I submit these comments on behalf of the Board of Directors of the Methow Conservancy.

Staff

Executive Director
Jason Paulsen

The Methow Conservancy is the Methow Valley's locally based independent land trust organization, whose mission is to "Inspire people to care for the land of the Methow Valley." Founded in 1996, the work of our organization is made possible by over 1,000 individuals, families, and local businesses who know and appreciate the role that conservation plays in the Methow Valley. With this support, we have partnered with over 105 private landowners to bring permanent protection to over 8,600 acres of the valley's private lands.

Associate Director
Sarah Brooks

Land Program Manager
John Sunderland

Stewardship Director
Heide Andersen

Educational Programs
Director
Mary Kiesau

From this perspective, we offer our comments in support of the mineral withdrawal proposed by your agency, and offer our appreciation for your leadership in moving this critical environmental review process forward so that it can be completed prior to December 30, 2018.

Conservation Biologist
Julie Grialou

This Proposed Mineral Withdrawal Builds On Important Community Investments

Monitoring and IT
Coordinator
Dawn Woodruff

The mineral withdrawal proposed by the Forest Service is both consistent with, and builds upon significant land conservation investments made not only by the Methow Conservancy, but also other land management agencies including the Washington State Department of Fish and Wildlife, Department of Natural Resources, Trust for Public Land, and others.

Land Project Manager
Jeanne White

Agricultural Coordinator
Alyssa Jumars

Membership Assistant
Mary Morgan

Bookkeeper
Joy Schwab

Our organization alone has raised and invested over \$25M in conservation transactions within the Methow watershed, leveraging additional philanthropic conservation easement donations. Focused on priority habitats, our work often seeks to protect habitat along the valley's rivers, or to provide habitat linkages between blocks of public land. We work only with willing, private landowners, and their partnership with us speaks to the conservation-ethic that is alive and well in our community.

We encourage the Forest Service to recognize that the imposition of a 20-year mineral withdrawal for the Methow Headwaters serves to support the decades of proactive conservation work that has occurred within the Methow watershed, and has no significant negative environmental impact.

This Proposed Mineral Withdrawal Protects a Unique Aquifer and Water Supply for People and Farms

The importance of the term “headwaters” cannot be overstated as it relates to the value of the mineral withdrawal being proposed. As a sole source aquifer located in a valley where there is a high level of permeability, any contamination of surface or ground water could have devastating impacts upon the Methow Valley’s only source of drinking water and agricultural water.

Studied for decades by Okanogan County and others at the time of a proposed major downhill ski resort development in Mazama, the hydrology of the upper Methow watershed is both unique and a significant contributor to the natural processes which shape the upper valley. In a nutshell, the available science shows that the Methow aquifer is a source of very high quality water, and that due to permeability, it is also readily susceptible to contamination.

A mineral withdrawal would provide important additional protections for the upper watershed, as any contamination from hard rock mining activities would contaminate the drinking water supply for over 5,000 residents, including two municipalities (Winthrop and Twisp), and countless agricultural operations including farms, ranches and orchards located from Mazama to Pateros and beyond.

As part of your environmental analysis of the impacts of a mineral withdrawal for the Methow Headwaters, we encourage you to find there is no environmental downside to bringing additional protections to the Methow watershed through this mineral withdrawal.

This Proposed Mineral Withdrawal Supports ESA Recovery Actions Already Underway

The Methow watershed is home to three Threatened or Endangered fish species (Spring Chinook Salmon, Steelhead, Bull Trout), and provides the northernmost spawning habitat in the Upper Columbia River system. A significant habitat protection and restoration effort has been underway over the past 17 years in the Upper Columbia Region, with nearly \$100M being invested in recovery actions in the Methow watershed alone.

Water quality and quantity are essential ingredients to the recovery efforts for each of these species, and the proposed mineral withdrawal serves only to support these investments. For these reasons, we both applaud and encourage a finding that this mineral withdrawal has only positive environmental benefits as it relates to ESA recovery actions underway in the Methow Valley.

This Proposed Mineral Withdrawal is Consistent with Community Values and Economy

From the earliest of time, the Methow watershed has been an important place for hunting, gathering, and spiritual connection by the Methow tribal people. This includes the area surrounding Flagg Mountain where the most recent exploratory drilling has been proposed. People and organizations are working actively in the Methow Valley to help maintain these important connections.

Today, the Methow Valley continues to be known regionally, nationally, and internationally as a destination for those seeking diverse opportunities to interact with the outdoors. From hunting opportunities here in the home of Washington's largest Mule Deer herd, to activities as diverse as snowmobiling and bird watching, the Methow Valley is a world class destination.

Home to the Nation's largest and most unique community Nordic ski trail system, the Methow Valley has evolved as a year-round destination for those seeking open spaces, scenic views, and easy access to North Cascades National Park, and the Ross Lake National Recreation Area.

Regardless of the nature of these activities, it is the underlying beauty and complexity of the natural environment which serves as the common denominator for why people flock to the Methow Valley to enjoy the opportunities provided by their public lands.

It is nearly universally recognized that the permitting and/or development of an industrial-scale copper mine would seriously threaten the quality of life, and the quality of recreational experiences in the Methow Valley. As a result, there is widespread community support for the mineral withdrawal your agency is proposing.

Additionally, simply the permitting of mine exploration in the Methow Headwaters region has the potential to seriously impact property values in the area of Okanogan County most responsible for tax base expansion via new construction. To further engage in the permitting of mineral exploration or development in the upper Methow watershed threatens to inject significant uncertainty into the real estate market and future valuations, potentially having significant impacts upon our local Town and County tax bases.

When the cultural and economic benefits of the environmental quality of the Methow Valley are taken as a whole, we believe that they significantly off-set any speculative economic benefits of mine development and operation. For this reason, we encourage you to find that the mineral withdrawal the Forest Service has proposed is supportive of the local economy of the Methow Valley now and into the future.


In Conclusion

We thank you again for the opportunity to inform your Scoping Process associated with the Forest Service's environmental review of the Methow Headwaters mineral withdrawal.

We both anticipate and hope that you will find that putting this withdrawal in place will have no significant environmental impacts. We also hope that this fact will allow your staff to complete the analysis in a timely manner and facilitate the imposition of the proposed 20 year mineral withdrawal within the current 2 year period provided by law.

If you have any questions, or wish to obtain any additional information in support of these comments, please do not hesitate to contact me at (509) 996-2870 or Jason@methowconservancy.org

Sincerely,


Jason Paulsen
Executive Director