



November 6, 2017

Mike Williams, Forest Supervisor
 Okanogan-Wenatchee National Forest
 Attention: Methow Headwaters Mineral Withdrawal
 215 Melody Lane
 Wenatchee, WA 98801

*Submitted via the U.S. Forest Service Comment Portal and to Amanda Velasquez at:
 amandavelasquez@fs.fed.us*

Re: Support for the Methow Headwaters Mineral Withdrawal, Project #52593

Dear Supervisor Williams,

The 13 undersigned state-based and national organizations write to express our support for the proposed 20-year administrative mineral withdrawal for the 340,079-acre Methow Headwaters region. Collectively our organizations represent nearly 200,000 members in Washington state and the greater Pacific Northwest. We have joined together to show our support for protecting the beloved Methow Valley from industrial-scale mining because of its exceptional beauty, high conservation values, abundant recreational resources, and unique character. Allowing any industrial-scale mining operation in the headwaters region would jeopardize the natural environment and devastate the local economy that depends on protecting the Methow Valley’s rural character and safeguarding its natural resources.

Our organizations would like you to consider the following information in the environmental planning process now underway:

- 1. The Methow Headwaters is a region with immense conservation value, including numerous endangered and threatened species dependent on an unfragmented and protected landscape.**

The Methow Valley is surrounded by the largest wilderness complex in the lower 48, with North Cascades National Park to the west, Lake Chelan-Sawtooth Wilderness to the south, and the Pasayten Wilderness high in the headwaters of the Methow watershed. The valley also sits at the convergence of two major ecological systems, resulting in tremendous diversity of vegetation and habitats found nowhere else in the lower 48. Seven federally protected fish and wildlife species depend on this landscape, with federally designated Critical Habitat for five protected species (spotted owl, Canada lynx, Chinook salmon, bulltrout, and steelhead). The cold, clean headwaters of the Methow River and its tributaries are particularly important to salmon recovery efforts in the upper Columbia basin.

The Methow Valley is also home to the state's largest mule deer population and serves as a major migration corridor. Furthermore, the area is currently being studied for grizzly bear recovery and naturally recovering gray wolves have returned to the Methow in the recent decade. Recognizing the ecological value of the Methow watershed, the National Forest Foundation designated the Methow as one of 14 treasured landscapes where the organization is working with the U.S. Forest Service and communities to restore and build ecologically resilient landscapes.

2. The Methow Headwaters is a region with unique and nationally significant trails and recreational resources.

The Methow Valley is the eastern gateway to North Cascades National Park and the North Cascades Scenic Highway travels through the valley, bringing more than one million visitors to the Methow each year. Millions of acres of public lands provide countless recreational opportunities for locals and visitors alike, including world-class cross-country skiing, mountain biking, climbing, hunting and fishing, wildlife watching, horseback riding, hiking and camping. Two national scenic trails – the Pacific Crest Trail and the Pacific Northwest Trail – pass through the Methow, and more than 1,000 miles of additional trails and dozens of campgrounds can be found in the valley. The Methow Valley is also home to the nation's largest cross-country ski trail system, with more than 150 miles of groomed skiing in the winter, which is operated (in part) with the U.S. Forest Service.

3. The public investment in this landscape for conservation, recreation, and restoration actions is unparalleled in Washington state and should not be jeopardized.

The Methow Valley has a long legacy of conservation and land protection, and more recently, restoration of local forests, rivers, and creeks. Nearly \$100 million has been invested in salmon restoration in the Methow watershed alone. An additional \$125 million has been spent on conservation and recreation efforts through the state's Recreation and Conservation Office. This quarter-billion-dollar investment of public funding underscores the Methow watershed's superlative ecological and recreational resources. Furthermore, the local Methow Conservancy has worked for the last three decades with private landowners on conservation and restoration projects, totally more than \$30 million in private investment.

4. The local economy is dependent on the protection of the natural environment and safeguarding of its natural resources such as clean water.

The Methow Valley is a critical economic driver in north central Washington, attracting nearly 1 million visitors annually along the North Cascades Highway. The valley is known for its vast open spaces, diverse recreational experiences, scenic views, local culture and charm, and more. Outdoor recreation pumps \$150 million into the Okanogan County's economy and 70 percent of county's workforce is closely tied to tourism. As the scoping notice highlights, the Methow Valley's economy is tightly linked to the recreation resources on U.S. Forest Service lands, which is dependent on maintaining public access; protecting wildlife habitat; and protecting the natural resources that local public lands provide, including clean water, which feeds and supports local farms and communities.

5. Hardrock mining for low-grade ore—like that present in the Methow Headwaters region—is a destructive activity that would jeopardize the natural environment and rural character of the valley.

One of the world's largest copper belts extends from the Methow to northern Canada, with eight producing copper mines in British Columbia. The proposed exploratory drilling project on Flagg Mountain, above Mazama, aims to explore a low-grade copper deposit that has a long history of prospecting. Through past exploration efforts, the "Mazama deposit" is known to be a low-grade deposit that would yield 1 billion pounds of copper and other precious minerals such as gold. Estimates show this kind of deposit would require an open-pit approach to mine, impacting more than 3,000 acres with mining-related infrastructure.

We know that the environmental impacts of mining are significant and difficult to mitigate or remediate. Digging, milling, and transport all create fugitive dust negatively affecting air quality, and mining activity and waste disposal threaten surface and groundwater systems. There is also the reality of running a 24/7 operation: lights, noise, and constant traffic on local two-lane and country roads. Furthermore, infrastructure needs are substantial: construction of new roads (and reinforcing of other infrastructure to handle heavy traffic), waste rock excavation and deposit areas, mineral processing plant, heavy equipment fueling facility, power plant and transmission lines, water supply and wastewater treatment facilities, administration and amenity buildings, and more.

The irreversible damages of industrial-scale mining on the precious natural resources, rural character and local economy of the Methow Valley pose too great of a risk to the Methow. This kind of development is not appropriate for the Flagg Mountain area or anywhere in the Methow Headwaters region now or in the future. There is simply too much to lose in this unique part of Washington state.

6. The outdated 1872 Mining Law gives federal agencies little discretion to reject or condition mining proposals even if a landscape—like the Methow Headwaters—has nationally significant values worthy of protection.

As stated in the U.S. Forest Service scoping notice, “Forest Service surface occupancy regulations will not adequately constrain land uses allowed under the General Mining Law . . . to protect the values at risk.” The U.S. Forest Service has the opportunity through its administrative power to protect the Methow Headwaters and make the region off-limits to industrial-scale mining for 20 years through an administrative mineral withdrawal. Congressional leaders are hard at work to pass a permanent mineral withdrawal to ensure the area will be protected forever.

7. The Methow Headwaters mineral withdrawal is broadly supported by local citizens and the business community as well as tribal nations, nonprofit organizations, civic leaders, and more.

An ever-growing, broad-based coalition is working together to secure a mineral withdrawal for the Methow Headwaters through the Methow Headwaters Campaign. More than 135 local businesses representing outdoor recreation, agriculture, education, hospitality, real estate, health and construction are driving the campaign at the local level and the effort has gained bipartisan support from local elected officials and tribal nations, including the Confederated Tribes of the Colville Reservation and the Confederated Tribes and Bands of the Yakama Nation. More than 40 nonprofit organizations from the local to national level also support the campaign including the Winthrop Chamber of Commerce and the conservation groups represented on this letter.

In conclusion, thank you for your leadership and efforts to advance the process to secure a 20-year mineral withdrawal for the Methow Headwaters region. Securing a 20-year withdrawal for this place would be precedent-setting and represent a proactive approach aimed at helping the U.S. Forest Service and Bureau of Land Management use their resources effectively and protect the substantial investment that has been made in the Methow’s natural environment by the government and private landowners. Thank you for protecting the clean water and natural assets of the Methow Valley that are a critical driver to north central Washington’s economy.

Sincerely,

Kitty Craig
Washington State Deputy Director
The Wilderness Society

Tom Uniack
Executive Director
Washington Wild

Mike Peterson
Executive Director
The Lands Council

Dave Werntz
Science Director
Conservation Northwest

Tom Hammond
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Susan Jane Brown
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Harry Romberg
Co-Chair, National Forest Committee
Sierra Club

Rob Smith
Pacific Northwest Regional Director
National Park Conservation Association

Wendy McDermott
Pacific Northwest Regional Director
American Rivers

Shawn Cantrell
Northwest Program Director
Defenders of Wildlife

Jonathan Stumpf
Chair of the Board
Wild Steelhead Coalition