



November 16, 2018

Erin Uloth,
Mt. Baker District Ranger
Mt. Baker Snoqualmie National Forest
810 State Route 20
Sedro-Wooley, WA 98284
Submitted electronically to:

**Re: Supplemental Comments on Excelsior Mine Redevelopment Draft
Environmental Assessment**

Dear Ms. Uloth:

Washington Wild and The Wilderness Society submit these comments as a supplement to our October 24 coalition comment letter on the draft Environmental Assessment (EA) for the Excelsior Mine redevelopment project located in the Mt. Baker Ranger District of the Mt. Baker-Snoqualmie National Forest.

Given the minimal 30-day comment period, we appreciate the Forest's willingness to continue to engage in a dialogue around this important issue. We were able to arrange a field tour of the Upper Road located within the roadless area and the original access road to the mine portal on Tuesday, November 13, with USFS Geologist Todd Griffin. That opportunity was extremely valuable for our organizations despite being outside the formal comment period.

We wish to bring to your attention a requirement of the Northwest Forest Plan that is highly relevant to the project but is not mentioned in the EA. Specifically, we are concerned that the Excelsior road access plan would violate the Northwest Forest Plan's prohibition against road building in inventoried roadless areas (IRAs) within Key Watersheds.

The Northwest Forest Plan's prohibition on road building is clearly stated on page C-7 of the Plan's standards and guidelines for Key Watersheds: **"Inside Roadless Areas – No new roads will be built in remaining unroaded portions of inventoried (RARE II)**

roadless areas.”¹ Unlike the Roadless Rule, the Northwest Forest Plan does not provide an exception for road building needed for hard rock mining development.

The scientific basis for this plan standard is explained as follows:

“Management activities in inventoried roadless areas with unstable land will increase the risk to aquatic and riparian habitat, impair the capacity of Key Watersheds to function as intended, and limit the potential to achieve Aquatic Conservation Strategy objectives. Standards and guidelines that refer to inventoried roadless areas (or simply ‘roadless areas’) apply only to those portions of such areas that would still qualify as roadless under the guidelines used to originally designate the areas under the second Forest Service Roadless Area Review and Evaluation (RARE II).

To protect the remaining high quality habitats, no new roads will be constructed in inventoried roadless areas in Key Watersheds.”²

The North Fork Nooksack River is listed as a Tier 1 Key Watershed (W-114) in the Northwest Forest Plan.³ The EA acknowledges that “the project area is located within the Upper North Fork Nooksack Watershed” and that “watershed analyses have been completed in the areas of the proposed project activities.”⁴ However, EA does not mention that the North Fork Nooksack River is a Key Watershed. Nor does it mention or analyze the Northwest Forest Plan’s road building prohibition in IRAs within Key Watersheds.

The proposed Excelsior road building would occur within the Mount Baker IRA. The EA acknowledges that the majority of the project area is located within the North Block of the Mt. Baker Roadless Area.⁵ It also discusses the Roadless Rule’s relevance to and effect on the road building proposal.⁶ However, the EA does not mention the Northwest Forest Plan’s standard prohibiting road building in an IRA within a Key Watershed and that standard’s relevance to and effect on the proposed road building activity.

¹ USDA Forest Service and USDI Bureau of Land Management. 1994. Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl, April 1994 (Attachment A to the Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl), p. C-7.

² Id. at B-19.

³ USDA Forest Service and USDI Bureau of Land Management. 1994. Final Supplemental Environment Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl, Vol. II, Appendix B6: Aquatic Conservation Strategy. p. B-102, Table B6-3: Key Watersheds on lands administered by the Forest Service and BLM within the range of the northern spotted owl.

⁴ EA, p. 41.

⁵ EA, p. 34.

⁶ EA, p. 8, 33-39.

The failure of the EA to recognize, consider, or analyze this requirement within a Key Watershed is a violation of the Northwest Forest Plan and the National Environmental Policy Act. We request that the Forest Service address this Northwest Forest Plan issue, along with the other issues raised in our coalition comment letter.

Sincerely,

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CC: Jamie Kingsbury, MBSNF Forest Supervisor
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