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First name: Trista Last name: Becker Organization:

Title:

Comments: The mining of ores in the headwaters of any salmonid streams always has been and continues to be incredibly irresponsible. With the increasing threats of habitat loss and climate change impacting salmon, trout, steelhead, bull trout, and Puget Sound resident orcas, this habitat becomes increasingly critical in the future as certain species such as chinook salmon heavily rely on undeveloped upstream spawning habitat for successful reproduction. The only responsible alternative would be the no action alternative where the past mining activities are cleaned up to correct the inappropriate mining activities in this headwaters area of the past. The fish and aquatic plan completely fails to address the total loss of lake habitat (over 18,000m2 of area) and the ecosystem impacts on T&E species that will occur. The impact of and mitigation for total loss of lake habitat and net half loss of critical headwaters stream habitat on salmonids and especially large bull trout is not addressed in the fish and aquatic mitigation plan. Diversion of lake fish such as large bull trout into smaller stream habitat and the subsequent impacts to other potential in-stream prey species created by this new overlap with T&E species such as chinook and steelhead is not addressed. Increased predation pressure on spring chinook by bull trout, as well as other likely secondary impacts due to such artificial displacement and interruption of the ecology that has developed since the last mining occurred would potentially lead to further loss of chinook production in the near future in the stream as bull trout as well as loss of large bull trout due to starvation. The temperature of the streams during summer relocation and the stressor that will cause to handled fish species is not appropriately addressed in the plan. This mining activity will lead to a destruction of critical headwaters habitat of many ecologically important species and is not in the best interest of public. Finally, the plan also fails to address any indigenous interests in site restoration and headwaters protection.