



April 7, 2019

Leo Bodensteiner  
 USA Co-Chair  
 Skagit Environmental Endowment Commission  
 700 Fifth Ave, Suite 3300  
 Seattle, WA 98124-4023

Thomas Curley  
 Canada Co-Chair  
 Skagit Environmental Endowment Commission  
 1610 Mount Seymour Road  
 North Vancouver, BC V7G 2R9

**RE: Comments on Giant Copper Property (Tenure Numbers: 236535, 236533, 236590) Notice of Work Referral Number: 109994684-011 Ministry of Energy and Mines REF: 0700195**

Dear Mr. Bodensteiner and Mr. Curley:

The undersigned conservation, recreation and wildlife organizations are writing to express and reinforce our strong opposition to any and all resource extraction activities in the headwaters of the Skagit River, inclusive of both the British Columbia Timber Sales (BCTS) proposed block and road development in the Upper Skagit River drainage (Silverdaisy and Twenty-Six Mile Creeks) and this subsequent mineral exploration permit application which has been enabled by the roading work initiated by prior BCTS activities.

The Skagit River flows south from British Columbia through Washington State through North Cascades National Park and Mt. Baker Snoqualmie National Forest before flowing into the Puget Sound.

As you should be aware, the 1984 High Ross Treaty between the United States and Canada resolved the dispute over raising Seattle's High Ross Dam and avoided flooding part of the Upper Skagit Watershed. Recognizing the unique ecological and recreational values of the Skagit Watershed, one of the main purposes of the Treaty was to maintain the environmental integrity of the Watershed. The City of Seattle and the BC government signed the accompanying Agreement.

Furthermore, the Treaty also created the Skagit Environmental Endowment Commission (SEEC) to administer this collaborative partnership, the Commissioners of which are appointed by the Premier and the Mayor. The governments together established SEEC's primary mission: (1) to conserve and protect wilderness and wildlife habitat, 2) to enhance recreation opportunities in the Skagit, and 3) to acquire mineral or timber rights consistent with conservation and recreational objectives.

Neither the previously allowed logging activities, pending timber sales, nor this latest mineral exploration permit proposal are in alignment or in keeping with the spirit and intent of the Treaty. The proposed mineral exploration activities including creating access roads and trails, conducting surface exploration drilling with associated water supply and catchment sumps, and mechanical trenching over a five-year period of continued disturbance are wholly unacceptable.

It is essential that all proposed or future timber sales in the Silverdaisy area be permanently terminated and that the proposed mineral exploration permit be denied, as these activities fundamentally risk and create irreparable harm to the entire Skagit watershed, including downstream impact in the United States.

Many of the undersigned organizations sent two previous letters on September 27 and December 21 last year expressing our opposition to logging activities in the Upper Skagit Watershed. These letters listed and described the specific issues we have with such activities and our issues and concerns still stand. Consistent with our issues our comments on the subject operating plan are as follows:

- Logging, mining and the associated infrastructure such as roads and holding ponds are inconsistent with the spirit and intent of the 1984 High Ross Treaty between the United States and Canada and the concurrent Agreement signed by the City of Seattle and British Columbia and should thus be halted permanently.
- One of the main purposes of the Treaty is to maintain the ecological integrity of the Upper Skagit Watershed. The Skagit Watershed supports large, diverse fish and wildlife populations and provides over 30 percent of the freshwater flowing into Puget Sound. It also provides critical habitat for imperiled species such as bull trout, grizzly bears, and spotted owls. Approximately, 90 percent of bull trout from Ross Lake spawn in the Upper Skagit downstream of the proposed activities. Logging and mining are well known to increase sediment, water temperatures and threats of contaminants in downstream areas which would impact this and other aquatic species downstream.
- The Skagit River supports the largest populations of threatened steelhead and Chinook salmon in the Puget Sound, and the largest run of chum salmon in the conterminous US. These fish are a critical food resource for the imperiled Southern Resident Killer Whales and are central to the culture and integrity of several Tribes both in the United States and Canada who have treaty rights to these important resources.
- The proposed activities are in the “donut hole”, an area encircled by Skagit Valley and Manning Provincial Parks, that was left out of the parks due to existing mineral claims. Consistent with its purpose, the SEEC has been actively pursuing acquisition of these claims in order to protect and incorporate the donut hole into one of the adjacent parks. This has been done with the knowledge and encouragement of the BC government. Logging and mining in the donut hole conflicts with the intent and the efforts made thus far to protect this area and incorporate it into the surrounding parkland.

In conclusion, we urge immediate action by the Government of British Columbia to facilitate the purchase of the mineral tenures, cancellation of all pending and future timber sales within the donut hole of the Upper Skagit, and for the change of designation of these lands from working forest to protected wilderness.

Sincerely,

Tom Uniack  
Executive Director  
Washington Wild

Thomas O’Keefe, Ph.D.  
Pacific Northwest Stewardship Director  
American Whitewater

Mark Sherwood  
Executive Director  
Native Fish Society

Peter Bahls  
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Michelle Connor  
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Rich Simms  
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Phil Fenner  
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Becky Kelley  
President  
Washington Environmental Council

Greg Haller  
Conservation Director  
Pacific Rivers

Bill Wheeler  
President Washington State Council  
Fly Fishers International

John McGlenn  
President  
Washington Wildlife Federation

Harry Romberg  
Co-Chair, National Forest Committee  
Washington Chapter of the Sierra Club

CC: Washington Governor Jay Inslee  
Senator Patty Murray (D-WA)  
Senator Maria Cantwell (D-WA)  
Congresswoman Suzan DelBene (D-WA01)  
Seattle Mayor Jenny Durkan