



State of Washington
Department of Fish and Wildlife

Mailing Address: PO Box 1100, La Conner WA 98257, (360) 466-4345, TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

November 12, 2020

SEPA Center
P.O. Box 47015
Olympia, Washington 98504-7015

RE: Comments on proposed mine: File No. 20-092802, Surface Mining Reclamation Permit #70-013279

To whom it may concern,

The Washington Department of Fish & Wildlife (WDFW) appreciates the opportunity to review the State Environmental Policy Act (SEPA) Environmental Checklist and other documents associated with the proposed Cascade Big Bear mine project. To that end, WDFW does not feel the current level of environmental review has enough information for making a threshold determination for a project with such a prolonged duration on the landscape. The WDFW is responsible for overseeing the viability of the state's fish and wildlife resources now and into the future. The areas of concern are, but may not be limited to:

- A lack of detail concerning the survey methodologies and the number and extent of visits to document plants and animals at the proposed site.
- Insufficient assessment or consideration of the potential for take, as defined in the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, that may result in the destruction or abandonment of nests, eggs, and young for tree and cliff-nesting birds, including bald eagle and peregrine falcon, where proposed mining activities are proposed to occur.
- The long-term impacts caused by site activity and noise on the use of the proposed site and adjacent areas by state endangered fishers and gray wolves.
- Loss of wildlife habitat.
- Long term effects on wildlife travel corridors and rearing and breeding habitat.
- Unknown impacts to threatened and endangered species.
- Potential water quality issues impacting aquatic species.

In partnership with the U.S. National Park Service, the WDFW has recently reintroduced fishers into two nearby locations, one north of the site and the other south of the site. The goal is to recolonize the habitat between the two release areas. To date, telemetry data shows that the fisher relocation project has been successful in reaching its goal, with at least one individual known to have used areas near the proposed mine. Similarly, we



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know from telemetry data that gray wolves, also an ESA listed species in the western two-thirds of Washington, occupy areas within proximity of this site.

Because of the combined potential for impacts to migratory birds and threatened and endangered species, the duration of the proposed mine, and uncertainty of the consequences to downstream water quality, the WDFW believes that the project has the potential for significant impacts to fish and wildlife resources. Subsequently, the WDFW believes an Environmental Impact Statement (EIS) should be required by the applicant before permitting progresses.

Due to these concerns and others, WDFW urges Washington Department of Natural Resources to make a Determination of Significance on this project and to require an EIS to ensure a proper evaluation of the short and long term environmental impacts of this project.

We appreciate the opportunity to review and comment on this proposed project and look forward to working with you as this application moves through the process.

Sincerely,

Robert Warinner
Assistant Regional Habitat Program Manager
1100 Sherman Street
La Conner, WA 98257

(360) 466-4345

cc: Brendan Brokes, WDFW Regional Manager
Chuck Stambaugh-Bowey, WDFW Regional Habitat Program Manager
Fenner Yarborough, WDFW Regional Wildlife Program Manager
Edward Eleazer, WDFW Regional Fish Program Manager
Robert Waddell, WDFW District Wildlife Biologist