

ALPINE LAKES PROTECTION SOCIETY ♦ AMERICAN RIVERS ♦
AMERICAN WHITEWATER ♦ CONSERVATION NORTHWEST ♦
FRIENDS OF HEYBROOK RIDGE ♦ FRIENDS OF WILD SKY ♦
SIERRA CLUB – WASHINGTON STATE CHAPTER ♦ THE MOUNTAINEERS ♦
NORTH CASCADES CONSERVATION COUNCIL ♦
PILCHUCK AUDUBON SOCIETY ♦ THE WILDERNES SOCIETY ♦
WASHINGTON TRAILS ASSOCIATION ♦ WASHINGTON WILD

July 26, 2013

Todd Griffin, Geothermal Team Leader
Mt. Baker Snoqualmie National Forest
2930 Wetmore Avenue, Suite 3A
Everett, WA 98201
Submitted electronically to: toddgriffin@fs.fed.us

Re: Environmental Assessment (EA) for the proposed Skykomish Geothermal Consent to Lease project

Dear Mr. Griffin,

On behalf of the 13 undersigned organizations and the tens of thousands of forest users, Washington residents and federal taxpayers who they represent, we are submitting written comments on the Environmental Assessment for the proposed Skykomish Geothermal Consent to Lease project.

Our organizations support efforts to responsibly develop renewable energy resources as an alternative toward continued heavy reliance on non-renewable fossil fuels. Such endeavors are one of many potential solutions to the increasing problem of climate change. We recognize that geothermal energy has important potential benefits in this regard as its development is now being pioneered here in Washington State.

However, we also feel strongly that renewable energy development is not appropriate everywhere, or at any cost. For example, areas that boast some of the last best wildlife habitat and connectivity or wild intact ancient forests are not compatible with geothermal development or even certain levels of exploratory drilling. In addition, landscapes where significant resources have been invested to restore watersheds for healthy fish populations and clean and safe drinking water significantly bias a cost/benefit analysis against development.

The focus of the current NEPA process is for the Forest Service to review the nominated lands provided by BLM officials and provide or deny a consent to lease with or without stipulations. We believe that despite being the initial stage, this process is extremely important. It is the only stage that has a specific focus on whether such lands are appropriate for exploratory drilling and what stipulations are necessary to protect the decades of investment the Forest has made in protecting our fish, wildlife, watersheds and recreational opportunities. Later stages in this process, including exploratory drilling or facility development, assume the activity in question and focus more on the mitigation or consequences of those actions.

Additionally, the consent to lease environmental assessment, the action alternative and any related geothermal leasing activities within the project area must meet the standards and guidelines of the Northwest Forest Plan, the Mt. Baker-Snoqualmie Land and Resource Management Plan and all applicable laws and regulations.

Many of our same organizations submitted comments during the scoping period on August 6, 2012. These comments followed a field tour of the lease area with Skykomish Ranger District and Mount Baker Snoqualmie National Forest staff on July 23, 2012.

I. Scoping Concerns Completely or Largely Addressed in the Environmental Assessment

1. Recognition that the proposed leasing is in the heart of a beloved area – Wild Sky

We appreciate that the Environmental Assessment references the 12,000-acre Skykomish lease area is located at the heart of what has affectionately been called “Wild Sky Country.” In our previous scoping comments we asked that this fact be included as context for this project.

On Page 22, the EA states, “the proposed activities are located along the North Fork Skykomish River and the Beckler River on the western flanks of the north central Cascade Mountains of Washington State. The activities are on Mt. Baker – Snoqualmie National Forest lands adjacent to the Wild Sky and Henry M Jackson Wildernesses areas.” On page 90, the EA adds, “all of the nominated lands are adjacent to the Wild Sky Wilderness.”

It would seem appropriate to expand upon the comments in the EA even further. Over the last decade, no area has received more diverse and local support for permanent protection of old growth and mature forests, preservation of world class recreational opportunities, and river and watershed protection and restoration.

A decade-long citizen campaign ultimately led to designation of 106,000 acres of wild forest land as the Wild Sky Wilderness in 2008. An unprecedented 750 elected officials, local businesses, conservation and recreation groups, local stakeholders and faith leaders endorsed the proposal, which represented the first new national forest wilderness designation in Washington State in 24 years.

2. No Surface Occupancy Lease Stipulations

We appreciate that the Environmental Assessment proposed a No Surface Occupancy (NSO) stipulation for several areas in the leasing area in agreement with our previous scoping comments. This stipulation prohibits any surface development and requires the lessee to develop any necessary surface infrastructure for exploratory drilling outside of the NSO area and use advanced technology, such as directional drilling, to access any geothermal resource under the NSO area.

Designated or Eligible Wild and Scenic River Corridors

The EA contains a ¼ mile buffer around designated or eligible Wild and Scenic River corridors to be put forward as a No Surface Occupancy Stipulation. There are a number of rivers within the nominated lands that are listed as eligible under the Wild and Scenic Rivers Act by the Mount Baker Snoqualmie National Forest in its 1990 Forest Land and Resource Management Plan. Eligible rivers include the North Fork Skykomish, Beckler, Rapid Rivers and Troublesome and West Cady Creeks. The North Fork Skykomish

and Troublesome and West Cady Creeks were additionally found suitable (or recommended) under the 1990 Plan.

The programmatic EIS developed by the BLM clearly indicates that rivers found eligible by the agency (in addition to those found suitable or designated by Congress) should be applied a No Surface Occupancy lease stipulation within a .25 mile corridor on either side of the relevant river sections.

“Segments of rivers determined to be potentially eligible for Wild and Scenic Rivers (WSR) status by virtue of a WSR inventory, including a corridor of 0.25 miles from the high water mark on either side of the bank.”¹

Riparian Areas

The EA contains 4,309 acres of riparian areas to be put forward as a No Surface Occupancy Stipulation. A significant portion of the nominated lands fall within the Riparian Reserves as mapped in Figure 4. Nominated Lands and NWFP Riparian Reserves (P. 36) in the Environmental Assessment. These areas have been recognized for their critical importance to fish, wildlife and the overall ecosystem functions of the larger watershed in the Northwest Forest Plan. In order to be consistent with the Northwest Forest Plan Standards and Guidelines for Riparian Reserves, the Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western US (PEIS 2008) developed by the Bureau of Land Management indicates that such areas should contain a No Surface Occupancy lease stipulation.

Additionally, the Record of Decision for Mt. Baker-Snoqualmie National Forest Geothermal Leases (ROD 2010) even more clearly demonstrates this point:

“Portions of the leasing area within riparian reserves should carry the following stipulations: For class 1 and 2 streams, no surface occupancy within 300 feet slope distance (300 feet total, including both sides of the stream channel). For class 3 streams, no surface occupancy within 150 feet slope distance (600 feet total, including both sides of the stream channel). For class 4 streams, no surface occupancy within 100 feet slope distance (200 feet total, including both sides of the stream channel). Within riparian reserves of all leases, no surface occupancy shall be permitted.”²

Designated or Proposed Critical Habitat Areas

The EA contains at least 5,036 acres of designated or proposed critical habitat areas to be put forward as a No Surface Occupancy Stipulation. On page 11 of the EA it states that a No Surface Occupancy stipulation would be applied to, “designated or proposed critical habitat for listed species under the Endangered Species Act of 1973 (as amended) if it would adversely modify the habitat. For listed or proposed species without designated habitat, NSO would be implemented to the extent necessary to minimize or avoid adverse impacts.”

In Table 14 on page 54 of the EA, the threatened, endangered, proposed, sensitive, management indicator species, and Survey & Manage species that are present or suspected to be present in the proposed leasing area include Critical Habitat: Northern Spotted Owl, Critical Habitat: Marbled Murrelet, Grizzly Bear, Gray Wolf, American Peregrine Falcon, Bald Eagle, Harlequin Duck, California wolverine, Townsend’s big-eared bat, Mountain goat, American Marten, Pileated Woodpecker, Black-Tailed Deer, Elk, Puget

¹ Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western US (PEIS 2008). Pg. 2-17.

² Record of Decision for Mt. Baker-Snoqualmie National Forest Geothermal Leases (ROD 2010), pg. 3.

Oregonian, Evening Fieldslug, Warty Jumping Slug, Blue-gray tail-dropper, and the Keeled Jumping Slug.

Page 54 of the EA states, “the northern spotted owl is associated with late successional and old growth conifer forest (Thomas et al., 1990) but can forage and disperse in younger forest conditions that contain similar stand structure found in old-growth forests.” Page 55 of the EA continues, “To help achieve recovery objectives for the northern spotted owl, the U.S. Fish and Wildlife Service, under ESA authority, designated critical habitat on Federal lands throughout the range of the northern spotted owl. Initial designation occurred in January 1992 (final rule, Federal Register (RF) vol. 57, pp. 1796-1838). CHU designation was updated in 2012 to further respond to the continued declining population of the species throughout most its range since its original listing. The revised 2012 designation includes nearly the entire proposed geothermal lease area north of the Beckler-Rapid River confluence. Within the proposed lease area critical habitat designation is absent with the Rapid River basin east of the Beckler River basin confluence.”

Any of the nominated lands that fall within designated or proposed critical habitat for federally listed species would not be compatible with leasing and should be applied a NSO stipulation. Existing or potential habitat for listed species that do not have critical habitat identified, and sites occupied by federally listed species including candidates, classified by the Forest Service as “Survey and Manage” and/or “Sensitive,” or classified by Washington State as “Species of Concern” should also be considered for a NSO lease stipulation.

The Programmatic EIS (PEIS 2008) lists the following areas as meriting a NSO lease stipulation:

“Designated or proposed critical habitat for listed species under the Endangered Species Act of 1973 (as amended) if it would adversely modify the habitat. For listed or proposed species without designated habitat, NSO would be implemented to the extent necessary to avoid jeopardy.”³

Furthermore, the 2010 ROD makes it clear that in the Mt Baker District designated critical habitat shall carry a NSO lease stipulation:

“All lease areas are also designated critical habitat for both species and contain the primary constituent elements of critical habitat for nesting. Surface occupancy would result in the destruction of critical habitat for both species. Therefore within old-growth forests of all lease areas, no surface occupancy will be permitted.”⁴

Slopes Greater Than 40%

The EA contains 7,993 acres of slopes greater than 40% to be put forward as a No Surface Occupancy Stipulation. Both the North Fork Skykomish and Beckler River Valleys are characterized by vertical and steep slopes, in part explaining their scenic and recreational appeal. At issue is that in order to clear and prepare a 1-2 acre drill pad for exploratory drilling on slopes greater than 20%, significant economic and ecological costs are required.

³ Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western US (PEIS 2008). Pg. 2-17.

⁴ PEIS, pg. 4.

To that end, the programmatic EIS (2008) developed by the BLM calls for a No Surface Occupancy lease stipulation for slopes in excess of 40%. Our understanding is that lease sites with slopes above 20% are rarely economically viable for industry.

Protection of Recreational Areas

The EA also recommends protection of recreational areas to be put forward as a No Surface Occupancy Stipulation. On Page 86 the EA recommends a, “No Surface Occupancy stipulation for developed recreational facilities and dispersed sites with significant recreational use.”

3. Timing Limitation, Controlled Use or Other Stipulations

We appreciate that the Environmental Assessment proposed Timing Limitation & Controlled Use Stipulations for several areas in the leasing area in agreement with our previous scoping comments. A Timing Limitation (TL) Stipulation can be used where standard lease terms and permit level decisions are deemed insufficient to protect sensitive resources and a no surface occupancy stipulation is deemed unnecessary. It is important to note that a TL stipulation is not a substitute for a NSO stipulation. In general, timing limitations are used to protect specific resources that are sensitive to disturbance during certain periods or seasons. They are commonly applied to wildlife activities and habitats and could be used to reduce impacts to recreational opportunities.

A Controlled Surface Use (CSU) Stipulation can be used to require any future activity or surface development be mitigated to protect a specific resource. The project applicant would be required to submit a plan to meet the resource management objectives through special design, construction, operation, mitigation, reclamation, or relocation. In general, CSU stipulations are used to protect specific resources on landscapes that are not deemed to merit a NSO stipulation. It is important to note that a CSU stipulation is not a substitute for a NSO stipulation.

Slopes Between 30% and 40%

The EA contains 1,676 acres of slopes between 30% and 40% to be put forward as a Controlled Use Stipulation. On page 48, the EA stipulates, “controlled surface use on slopes greater than 30 percent and/or erodible soils as defined as severe or very severe erosions classes based on Natural Resources Conservation Service mapping.” On page 47, the EA states, “actions taking place on slopes greater than 30% and/or areas of unstable soils are more likely to result in surface erosion, soil displacement and mass wasting. These effects may also cause introduction of sediment into surface waters and wetlands, leading to increased turbidity.”

The MBS 2010 Record of Decision also applies an NSO stipulation with additional stipulations for slopes between 30% and 40%.

“On slopes in excess of 40 percent and/or highly erodible soils, no surface occupancy will be permitted. For operating plans on slopes between 30 and 40 percent, the lease holder would be required to develop a plan of additional design, construction, operation, mitigation, and reclamation measures . . . unless the plan is approved, no surface occupancy would be permitted.”⁵

⁵ Record of Decision for Mt. Baker-Snoqualmie National Forest Geothermal Leases (ROD 2010), pg. 6.

Semi-Primitive Non-Motorized Areas

The EA includes Semi-Primitive Non-Motorized Areas to be put forward as a Controlled Use Stipulation. On Page 86 the EA states that a, “controlled surface use stipulation shall be required within MA1B, Semi-Primitive Non-Motorized areas.” These areas are identified in Figure 9 - Recreational Opportunities on page 83.

The area in which the nominated lands occur are important for a variety of recreational uses throughout the year including hiking, camping, backpacking, rafting, kayaking, climbing, horseback riding, cross country skiing, snowshoeing, mushroom and berry picking, and other activities. A variety of popular trailheads and campgrounds in the area are accessed by two main roads, Forest Road 63 (along the North Fork Skykomish River) and 65 (along the Beckler River), including the Blanca Lake Trail, West Cady Ridge Trail, Quartz Creek Trail, Evergreen Mountain Trail, Johnson Ridge/Scorpion Mountain Trail, and Troublesome Creek and San Juan Campgrounds.

The 2008 PEIS identifies such stipulations for the protection of recreational use:

“Protection of Recreational Areas - This stipulation would be applied to minimize the potential for adverse impacts to recreational values, both motorized and non-motorized, and the natural settings associated with the recreational activity.”⁶

Inventoried Roadless Areas

The EA includes inventoried roadless areas to be put forward as a Controlled Use Stipulation. Page 14 of the EA states, “specifically, no new road construction or reconstruction would be allowed in inventoried roadless areas without the approval of the Secretary of Agriculture.”

Important Cultural & Archeological Sites

Page 71 of the EA states, “the nominated lands are within the Usual and Accustomed Fishing Areas of the Tulalip Tribes (BIA, 1980).” Cultural sites within the nominated lands (including sacred sites or hunting and gathering areas for Tribes), should be applied a stipulation to protect these resources. We expect that the agency will engage in a separate consultation with the Tulalip and other relevant Tribes on this project to identify any such areas. The 2008 PEIS lists such areas as grounds for a NSO stipulation:

“Areas with important cultural or archeological resources, such as traditional cultural properties and Native American sacred sites, as identified through consultation.”⁷

On page 72, the EA references a letter from the Tulalip Tribes, “During consultation, the Tulalip Tribes expressed the importance of the Skykomish Geothermal Nominated Lands for providing the availability to exercise their reserved treaty hunting, fishing and gathering rights on the Forest... It stated that the Tulalip Tribes would not support geothermal exploration or development unless they were assured that such development would not lead to disruption of the animal populations, their hunts, or to the general exercise of Tulalip’s treaty rights in the nominated areas.”

⁶ Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western US (PEIS 2008). Pg. 2-17.

⁷ PEIS 2008, pg. 2-17.

On page 73, the EA states that “The following stipulation will be applied to facilitate the exercise of Reserved Treaty Rights on National Forest System lands: Any subsequent action will require government to government consultation regarding Reserved Treaty Rights.”

National Historic Sites

The EA identifies potential historic sites and properties that are designated or found eligible for the National Register of Historic Places for consideration with respect to stipulations. On page 71, the EA states, “Within the nominated lands, GIS analysis revealed six previously recorded historic sites and six noted locations from documentary records of possible historic sites. Five of the recorded sites were previously determined ineligible for the National Register of Historic Places.

On page 73, the EA states, “In accordance with BLM Instruction Memorandum No. 2005-003, the BLM shall apply the following stipulation to protect cultural resources (USDI BLM & USDA FS, 2008):

“This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.”

II. Scoping Concerns Not Addressed in the Environmental Assessment

1. All Late Successional Reserves should be applied a No Surface Occupancy Stipulation

A significant area of the nominated lands fall within the Late Successional Reserves which were mapped on the forest subsequent to the Northwest Forest Plan. These areas have been specifically identified as providing necessary old growth habitat for endangered northern spotted owls and marbled murrelets. In our scoping comments and on the field tour, we argued strongly that all LSRs should carry a no surface occupancy lease stipulation to be consistent with the Northwest Forest Plan.

Furthermore, the 2010 ROD makes it clear that in the Mt. Baker District designated LSRs would carry an NSO lease stipulation:

“All lease areas are within the Baker Late Successional Reserve that is managed to recover populations of northern spotted owls and marbled murrelets. Surface occupancy would result in the destruction of critical habitat for both species. Therefore within old-growth forests of all lease areas, no surface occupancy will be permitted.”⁸

The action alternative in the Environmental Assessment fails to achieve this important provision. In Figure 7 - Stand Year-of-Origin (Pg 52) and Table 13 - Area by Forest Stand Age (Pg 51) the EA recommends a No Surface Occupancy stipulation for stand ages greater than 80 years old totaling 5,036 acres with a comment for the oldest stands that states, “Potential owl and murrelet nesting habitat; NSO.”

⁸ Record of Decision for Mt. Baker-Snoqualmie National Forest Geothermal Leases (ROD 2010), pg. 4.

The Table provides the following comment for other stand age categories less than 80 years old:
“Controlled Surface use stipulation in forested stands > 80 years in LSR.”

We strongly believe that there is no justification for sub-dividing LSRs by stand age with respect to geothermal leasing. In some cases relating to timber harvest, national forests have allowed restoration thinning in LSRs with a stand age less than 80 with the goal of achieving expedited old growth characteristics and thereby achieving the overall goal of LSRs. Unlike restoration thinning, there is no argument that can be made that leasing will further the goals of the LSR. Therefore, all nominated lands designated as LSR should receive a NSO lease stipulation with respect to geothermal leasing regardless of their stand age.

2. Viewsheds Potentially Meriting Stipulations Were Not Identified in the EA

As we argued in our scoping comments, any areas that have been allocated or identified in the 1990 MBS Forest Management Plan to a management area or land use allocation focused on protecting a view shed or scenic resources (including Scenic Viewshed Foreground) should be applied a NSO stipulation to protect these resources. The 2008 PEIS lists such areas as grounds for a NSO stipulation:

“Designated important viewsheds, including (1) public lands designated as VRM Class I and; (2) NFS lands with a Scenery Management System integrity level of Very High.”⁹

It is not clear that the EA identified landscapes within the lease area that may merit a No Surface Occupancy or Controlled Use stipulations. The document does correctly indicate that such stipulations would apply if identified. On page 12-13, the EA includes the following relevant stipulations that should be applied:

“NSO stipulation: “Designated important viewsheds, including (1) public lands designated as VRM Class I and (2) NFS lands with a Scenery Management System integrity level of Very High.”

“CSU stipulation: “This stipulation would be applied to NFS lands with a Scenery Management System integrity level of High; and other sensitive viewsheds, such as within the visual setting of National Scenic and Historic Trails or near residential areas.”

The EA needs to identify if any of the above stipulations apply in the lease area.

3. The Agency should not assume geothermal potential for nominated lands

In reviewing the map of nominated lands by companies submitted to the Bureau of Land Management in 2011, it seems clear that there was little analysis put in to the viability or potential of these lands to produce economically viable geothermal energy. Rather, it appears that the attempt was focused more on including the maximum amount of lands on the Forest in the nomination (excluding private inholdings and designated Wilderness). There is an obvious lack of targeting based on potential of a viable geothermal resource by at least one of the nominating entities. We strongly believe that as the Forest

⁹ PEIS 2008, pg. 2-18.

makes their determinations to consent to certain areas for leasing and put stipulations on others as part of this process, there should not be an assumption of geothermal potential.

On page 77 the EA points out that, “Although limited geothermal exploratory drilling had been conducted, the majority of the Forest (1,222,812 acres) has been classified "prospectively valuable" for geothermal energy... There have also been recent exploratory shallow temperature gradient wells (700 feet) drilled on the Skykomish District, and one deep temperature gradient well (5,000 feet) drilled on private land within the boundaries of the Skykomish District. Currently no plans have been submitted for additional drilling on the Forest.”

Furthermore, we are aware that Snohomish Public Utilities District (SnoPUD) has spent considerable time, effort and funds on exploratory drilling for viable geothermal resources on the privately owned Garland Mineral Springs over the past two years. We also know, from meeting with SnoPUD in the past, that their data has identified the Garland Mineral Springs as by far the most promising area to find the required heat at depth for potential geothermal resources. It is our understanding that the Garland site did not meet the temperature at depth to be economic and that the site is being decommissioned. To our knowledge, none of the nominated lands exhibit the relatively promising attributes as the Garland Mineral Springs, and the vast majority of the 12,000 acres are miles away from that resource.

4. Directional drilling underneath the Wild Sky Wilderness should specifically be prohibited in the Record of Decision

It is clear that the Wild Sky Wilderness is withdrawn from leasing, as indicated in the maps accompanying the scoping letter. However, we would like to make clear that in addition to the surface estate of the designated wilderness being exempted from any leasing, so should any access to subsurface lands underneath the designated Wild Sky Wilderness. Unlike a No Surface Occupancy stipulation, which would allow directional drilling under such an area from an adjacent leased parcel, directional drilling or any access to the subsurface of the designated Wild Sky Wilderness should be clearly prohibited in the Environmental Assessment, the subsequent Record of Decision and within any leasing documents that might follow. The investment that has been made by all Americans in protecting the small percentage of our federal lands as Wilderness needs to be honored. Groundwater contamination from drilling or impacts to ecosystem services from development of geothermal pockets could have negative impacts on the Wilderness character for which the Wilderness area was designated.

5. The Agency should stipulate that only existing open roads shall be used

Because of the many efforts that the Forest Service has made in recent decades to close and rehabilitate unneeded or harmful roads in the North Fork Skykomish and Beckler River watersheds, no further roads should be created, nor should decommissioned roads be reconstructed or opened, for the purposes of exploratory drilling. The ability to directionally drill makes it unnecessary to build new roads to emplace drilling equipment. Please stipulate that all access for drilling shall take place using existing open roads, and that drill pads shall be immediately adjacent to existing roads. To further reduce environmental impacts, drill pads should use portions of existing road prisms whenever feasible.

As you know the Mount Baker Snoqualmie National Forest has initiated a required analysis of a sustainable road system, including public meetings. We are aware and sympathize with the sobering realities and hard decisions ahead as the agency must deal with significant maintenance backlogs on system roads, anticipated future storm events, and shrinking budgets. Many of our organizations are working with the Forest as part of the sustainable roads cadre to help identify the priority roads that

provide important access, while identifying those decaying legacy roads that do not provide key access but pose significant aquatic and watershed risks due to lack of maintenance, not to mention adding to the growing maintenance backlog. Adding new roads or re-commissioning decommissioned roads related to geothermal leasing would be a step backwards and counterproductive to the sustainable roads analysis currently underway.

In closing, we appreciate the opportunity to give substantive comments to the Skykomish Consent to Lease Environmental Assessment. We hope that these comments both highlight the interest and investment in this area by a wide variety of organizations and help the agency to fully consider these incredible resources during this process. We are appreciative of the several stipulations that are identified in the action alternative which we raised in our scoping comments. However, we urge the agency to focus their consideration on the additional stipulations highlighted in these comments that were not addressed in the current Environmental Assessment.

Feel free to contact Tom Uniack, Conservation Director for Washington Wild directly, or on behalf of the undersigned organizations, at 206-633-1992 or tom@wawild.org.

Sincerely,

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