

**Appendix G**  
**Comment Letters from**  
**Elected Officials and Federal, State and Local Agencies**  
**Buckhorn Access Project**

The Council on Environmental Quality's implementing regulations for the National Environmental Policy Act require that, at a minimum, comment letters on draft Environmental Impact Statements (EIS) by elected officials, and Federal, State and local agencies be published with the final EIS. Because of the volume of comments, comments are summarized and responded to in Appendix F of this final EIS, and only letters from elected officials, and Federal, State and local agencies are published here. A complete set of all comment letters is included in the project file at the Tonasket Ranger District Office.

# 2



**Olympia Office:**

115D Irv Newhouse Building  
PO Box 40407  
Olympia, WA 98504-0407  
Phone: (360) 786-7612  
FAX: (360) 786-1999  
E-mail: morton.bob@leg.wa.gov

# Washington State Senate

**Senator Bob Morton**  
7th Legislative District

**District Office:**

3278 Pierre Lake Road  
Kettle Falls, WA 99141  
Phone: (509) 684-5132

December 27, 2005

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As the State Senator representing District 7, which covers the Buckhorn Mountain project area in Okanogan County and the Kettle River Operations in Ferry County, I am writing to urge the U.S. Forest Service, Okanogan and Wenatchee National Forest to issue the final Environmental Assessment (EA) and to approve Alternative B (Crown Resources Corporation's proposal) for the Buckhorn Mountain Project. The Forest Service should consider the Buckhorn Mountain Project is a very simple project proposal to use public lands for access to the project, a utility corridor, fences, and an infiltration gallery.

The EA is a comprehensive document that clearly reveals this is an environmentally responsible project. As explained in the EA, the Buckhorn Mountain Project will have minimal environmental impacts on and off of National Forest System lands. This document confirms my long-held belief that the Buckhorn Mountain Project can be built, operated, and reclaimed in a manner that is fully protective of the environment.

This area has patiently waited while studies and research have been completed. It now needs this project to become a reality. We need the jobs and economic activity this project will provide. I cannot imagine a more thoroughly studied project. Without a doubt, it is one of the most carefully studied projects in the history of Washington State. The Buckhorn Mountain Project should not have to do any more studies or jump over any more hurdles. It should be approved.

We all remember the controversy over the Crown Jewel Project. Those days are gone. The vast majority of my constituents support the Buckhorn Mountain Project and are anxious to see this project developed. People understand that the revised project proposal for an underground mine and off-site milling represents a significant opportunity to develop a mine with the least possible impact upon the environment. It also represents the best opportunity to maintain and create high-paying jobs, which are sorely needed in this economically challenged part of Washington State. With the mine in Okanogan County and the mill in Ferry County, this project is a win-win for both areas.

Please do not let the few vocal detractors delay approval of this project. The company has gone the extra mile to work with the community and to address residents' concerns about traffic along the road. We should all recognize that there are a few anti-mining activists in the area who simply don't want to see this project or any mining project developed.

Putting the Buckhorn Mountain Project into production will allow the continued operation of the Kettle River Operation milling facility. In addition to being an essential component of the economy of the region, the Kettle River Operations is an excellent corporate neighbor that has contributed much to the community for more than a decade. It is thus essential that this project be permitted as soon as possible in order for the recently laid-off Kettle River mill workers to be put back on the payroll and to allow the laid-off mine workers to start working at the mine in Okanogan County.

Once again, I wish to stress the importance of issuing the Final EA and approving Alternative B for the Buckhorn Mountain Project as soon as possible.

Cordially yours,

A handwritten signature in black ink that reads "Bob Morton". The signature is written in a cursive, slightly slanted style.

BOB MORTON  
State Senator

# Bob Morton

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Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Ave. South  
Okanogan, Washington 98840

December 27, 2005

Dear Supervisor Boynton,

As the State Senator representing District 7, which covers the Buckhorn Mountain project area in Okanogan County and the Kettle River Operations in Ferry County, I am writing to urge the United States Forest Service to issue the final Environment Assessment (EA) and to approve alternate B (Crown Resources Corporation's proposal) for the Buckhorn Mountain project. The Buckhorn Mountain project is a very simple proposal to use public lands for access of a utility corridor, fences, and an infiltration gallery.

The EA is a comprehensive document that clearly reveals this is an environmentally responsible project. As explained in the EA, the Buckhorn Mountain Project will have minimal environmental impacts on and off of National Forest Systems Lands. This document confirms my long held belief that the Buckhorn Mountain Project can be built, operated and reclaimed in a manner that is fully protective of the environment.

The citizens of this area have patiently waited for numerous studies and research to be completed and the project to become a reality. We need the jobs and economic activity this project will provide. I cannot imagine a more thoroughly studied project. Without a doubt it is one of the most carefully studied projects in the history of the State of Washington. The Buckhorn Mountain Project should not have to do any more studies or jump over any more hurdles. It should be approved.

The vast majority of my constituents support the Buckhorn Mountain Project and are anxious to see the project developed. People understand and are comfortable that the revised project proposal for an underground mine and off-setting milling represents a significant opportunity to develop a mine with the least possible impact upon the environment. It also represents the best opportunity to maintain and create high-paying jobs, which are sorely needed in this economically challenged part of Washington State. With the mine in Okanogan County and the mill in Ferry County, this project is a win-win for both areas.

# Bob Morton

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Please do not let the few vocal detractors delay approval of this project. The company has gone the extra mile in working with the community and to address residents' concerns about traffic along the road. We should all recognize that there are a few anti-mining activists in the area who simply don't want to see this project or any mining project developed.

Putting the Buckhorn Mountain Project into production will allow the continued operation of the Kettle River Operation milling facility. In addition to being an essential component of the economy of the region, the Kettle River Operations is an excellent corporate neighbor that has contributed much to the community for more than a decade. It is thus essential that this project be permitted as soon as possible in order for the recently laid-off Kettle River mill workers to be put back on the payroll and to allow the laid-off mine workers to start working the mine in Okanogan.

Once again, I want to stress the importance of issuing the final EA and approving alternate B for the Buckhorn Mountain project as soon as possible.

Cordially yours,

Bob Morton  
State Senator



Cc: an open public letter

#12

STATE REPRESENTATIVE  
7th DISTRICT  
BOB SUMP

State of  
Washington  
House of  
Representatives

STATE GOVERNMENT  
COMMERCE & LABOR  
TECHNOLOGY,  
& ENERGY



December 29, 2005

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As the elected representative for District 7, Position No. 1, I am writing to express my support for the Buckhorn Mountain Project and to urge you in your official capacity as Forest Supervisor for the Okanogan and Wenatchee National Forests to issue the final Environmental Assessment (EA) for the Buckhorn Mountain Project as soon as possible. Your approval should authorize Crown Resources Corporation's project proposal, which is described as Alternative B in the EA.

The economic well being of the town of Republic is largely dependent on the Kettle River Operations, which recently had to layoff a substantial portion of its workforce. I am very concerned about the adverse economic effects of this layoff. I want to make sure that you are aware of the urgent need issue to the permits for the Buckhorn Mountain Project so these people can go back to work.

Your agency's EA proves there is simply no reason to delay the approval of this project. The proposed use of National Forest lands for the access road, utility corridor, fencing, and the infiltration basin strike me as very straightforward, easy to understand, and obviously necessary and appropriate. The EA thoroughly examines all aspects of these facilities and clearly reveals that there are very few environmental concerns associated with the Buckhorn Mountain Project either on or off of public land.

Once again, I urge the Forest Service to issue the Final EA and to approve the Buckhorn Mountain Project as soon as possible This community and my constituents simply cannot afford to wait any longer for this project to start.

Sincerely yours,

  
**BOB SUMP**  
State Representative  
7<sup>th</sup> Legislative District

STATE REPRESENTATIVE  
7th DISTRICT  
JOEL KRETZ

State of  
Washington  
House of  
Representatives



# 31  
CAPITOL BUDGET  
ECONOMICAL DEVELOPMENT,  
AGRICULTURE & TRADE  
NATURAL RESOURCES,  
ECOLOGY & PARKS

January 3, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

I represent District 7, Position No. 2 and the areas in which both the Buckhorn Mountain Project and the Kettle River Operations are located. I am writing as an elected official from these areas to stress the importance of the Buckhorn Mountain Project to this economically challenged region of Washington. It is critically important that the U.S. Forest Service/ Okanogan and Wenatchee National Forests issue the final Environmental Assessment (EA) and approve Alternative B for the Buckhorn Mountain Project as soon as possible.

It is very clear from the recently issued Preliminary EA that the Buckhorn Mountain Project will directly benefit Ferry and Okanogan Counties, and will indirectly benefit the rest of the State of Washington. This environmentally responsible project should be approved immediately so the workers recently laid off from the Kettle River Operations can go back to work and the new jobs associated with the Buckhorn Mountain mine in Okanogan County can become a reality.

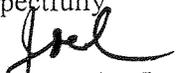
My constituents have waited for well over a decade for this mining project to bring a measure of economic growth and prosperity to the region. Frankly, we are out of patience and see no reason why we should wait any longer.

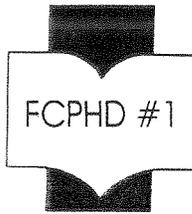
In considering the Final EA, it is hard to imagine that anything more could be said about the roads, utility corridor, fencing, and infiltration area that will be on public lands. The 343-page Preliminary EA examines these facilities in great detail. Consequently, the Forest Service has properly taken into account all relevant factors and has examined all aspects of the proposed project. It is also evident that the proposed project will have minimal environmental impacts both on and off of National Forest System lands. Given the thoroughness of the Preliminary EA, I would hope the Final Ea can be issued promptly.

The U.S. Forest Service should understand that there is a great deal of public support for the Buckhorn Mountain Project. Area residents recognize the need for this project and the benefits it will bring to Ferry and Okanogan counties. There is widespread awareness that the revised project proposal represents a significant opportunity to develop a mine with the least possible impact upon the environment. It also represents the best opportunity to maintain and create high-paying jobs, which are sorely needed in this economically depressed part of Washington State.

Once again, I strongly urge the U.S. Forest Service/ Okanogan and Wenatchee National Forests to issue the Final EA and approve Alternative B for the Buckhorn Mountain Project as soon as possible.

Respectfully

  
Representative Joel Kretz



"COUNT ON US  
TO CARE"

## FERRY COUNTY PUBLIC HOSPITAL DISTRICT #1

dba Ferry County Memorial Hospital (509) 775-3333 fax 775-3866

Republic Medical Clinic (509) 775-3153 fax 775-8929

Curlew Medical Clinic (509) 779-4049 fax 779-4004

#33

Mr. James L. Boynton,  
Forest Supervisor  
Okanogan and Wenatchee National Forest  
1240 Second Avenue South  
Okanogan, WA 98840

January 3, 2006

Dear Mr. Boynton:

Ferry County Public Hospital District supports the Buckhorn Mountain Project and requests that the U.S. Forest Service encourage the Washington Department of Ecology to complete the permitting process for the Buckhorn Mountain Project in a timely manner.

KinRoss Gold Corporation's Kettle River Operations of Republic in Ferry County recently had to lay off a number of employees because the mines in Ferry County have run out of ore. The Buckhorn Mountain Project is critical to the future of Kettle River Operations in Republic and the viability of Ferry County.

Loss of this operation will severely cripple the economic base of Ferry County. Therefore, the Board of Commissioners of Ferry County Public Hospital District are keenly interested in seeing the Buckhorn Mountain Project start up as soon as possible so milling activities can resume at the Republic milling site.

We provide health care services to the miners and their family members. The loss of these jobs will cause many to be without healthcare insurance and put them at risk of access to healthcare services. Also if mining operations are permanently closed and these workers are forced to leave the county to find adequate paying jobs, they take with them family members who may be nurses, healthcare technicians, teachers, etc. leaving critical voids in these professions thus threatening right of entry to healthcare, education and other important community services for the remaining residents.

The Supplemental Environmental Impact Statement (SEIS) that the Department of Ecology and the Environmental Assessment the U.S. Forest Service recently published does a good job of explaining the impacts associated with the project and the mitigation measures that will be used to eliminate or reduce minimal adverse impacts. These documents clearly show that this project will be protective of the environment.

The start up of the mine at the Buckhorn Mountain Project and the continued operation of the Kettle River Operations milling facility are obviously essential to the regional economy, specifically Ferry County.

The Hospital District wishes to emphasize the importance of issuing the permits for the Buckhorn Mountain Project as soon as possible. In addition to our concern for protecting our environment, we are equally concerned for the economic well being of our residents. They do not receive financial support from outside lobbyists; they work hard for their families to have a rural life. This is an environmentally responsible project. It should move forward now.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Ron O'Halloran".

Ron O'Halloran  
Administrator

# 35

City of Republic  
987 S. Clark Ave.  
P.O. Box 331  
Republic, WA 99166-0331



City Hall (509) 775-3216  
Public Works 775-2929  
Police: 775-2812  
TDD: 1-800-833-6388

January 3, 2006

James L. Boynton Forest Supervisor  
C/O Ms. Jan Flatten  
Okanogan & Wenatchee National Forest  
1240 Second Avenue South  
Okanogan, WA. 98840

Dear Mr. Boynton:

The Kettle River Operations in Ferry County, Washington is the largest employer in Ferry County. This letter is being sent to inform you that the City of Republic fully supports the Buckhorn Mountain Project, and to implore the U.S. Forest Service to finalize the Environmental Assessment and approve Kettle River's project proposal (Alternative B in the EA) for the Buckhorn Mountain Project as soon as possible.

The Kettle River Operations recently had to lay off a number of employees because the mines in Ferry County have run out of ore. We also understand that the Buckhorn Mountain project is very critical to the future of The Kettle River Operations and the citizens of Ferry County. Without the Buckhorn Mountain Project, which is located in adjacent Okanogan County, The Kettle River Operations will not have ore to process in their milling facility in Ferry County and will have to close permanently.

The loss of this company would severely impact our City and County. We are very interested in seeing the Buckhorn Mountain Project begin as soon as possible so milling activities can resume at The Kettle River Operations and we can continue to count on their providing jobs to the citizens of our city and county.

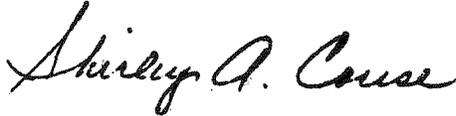
The Kettle River Operations employs a large number of people; the impact of not having them would be catastrophic to our City and County. Both the City and County governments are barely surviving with the small tax base that we have, and the loss of another large employer would finally finish off what economy we do have at this time.

The Draft Supplemental Environmental Assessment (EA) that the Forest Service recently published does a good job of explaining the impacts associated with the project and the mitigation measures that will be used to eliminate or reduce these impacts. This document clearly shows that this project will be protective of the environment.

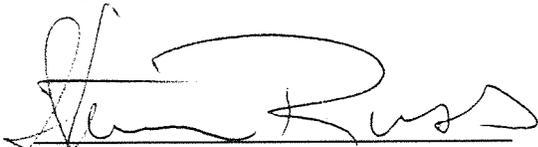
We cannot emphasize strongly enough the fact that this project is extremely important to the economic survival of The City of Republic, Ferry County, but also to Okanogan County and the State of Washington.

With these economic factors and the fact that this is an environmentally responsible project, we ask you to issue the permits for the Buckhorn Mountain Project as soon as possible.

Sincerely,



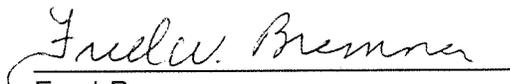
Shirley A Couse  
Mayor of Republic



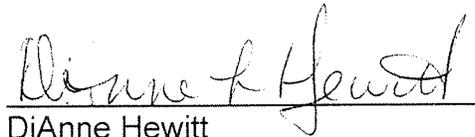
Steven L. Russ  
Council Person, Position #1



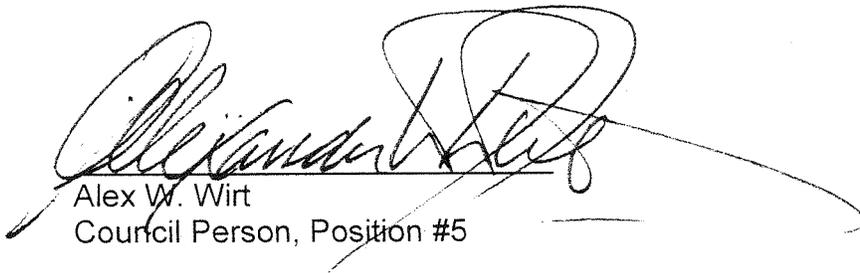
Linda Hall  
Council Person, Position #2



Fred Bremner  
Council Person, Position #3



DiAnne Hewitt  
Council Person, Position #4



Alex W. Wirt  
Council Person, Position #5

#61

STATE REPRESENTATIVE  
24th DISTRICT  
JIM BUCK

State of  
Washington  
House of  
Representatives

NATURAL RESOURCES,  
ECOLOGY & PARKS  
RANKING MEMBER  
TRANSPORTATION



January 3, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As a member of the Washington State Legislature, I am writing to inform you of my support for the Buckhorn Mountain Project and to urge you, in your role as Forest Supervisor of the Okanogan and Wenatchee National Forests, to expedite issuance of the final Environmental Assessment (EA) and to approve the Buckhorn Mountain Project as soon as possible.

Although I do not represent the areas in which the mine and milling facilities are located, I believe this project is important to the entire state, which is why I am requesting that the permitting process be completed in the shortest amount of time possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

The Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs. Given the dire economic circumstances in Ferry County, these jobs are essential.

If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that there is significant public support for the Buckhorn Mountain Project in Okanogan and Ferry Counties. The redesigned project proposal for an underground mine and off-

site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands. There is thus no reason to delay the approval of this important project.

I appreciate the opportunity to provide comments regarding the proposed Buckhorn Mountain Project.

Sincerely,

A handwritten signature in black ink that reads "Jim Buck". The signature is written in a cursive, flowing style.

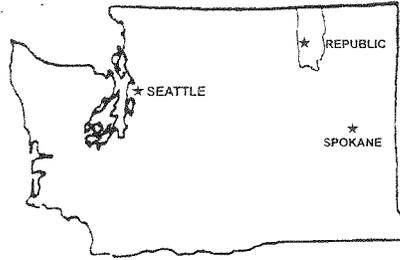
JIM BUCK  
State Representative  
24<sup>th</sup> Legislative District

#65

**FERRY COUNTY  
BOARD OF COMMISSIONERS**

290 EAST TESSIE AVENUE  
REPUBLIC, WASHINGTON 99166  
TELEPHONE (509) 775-5229 · FAX (509) 775-5230

JOY OSTERBERG, Clerk of the Board  
joy@co.ferry.wa.us



BRAD L. MILLER, Curlew-District #1  
RONALD L. BACON, Republic-District #2  
MIKE L. BLANKENSHIP, Boyds-District #3

January 3, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

On behalf of the Ferry County Commissioners, I am writing to let you know that we unanimously support the Buckhorn Mountain Project. We strongly urge the U.S. Forest Service/Okanogan and Wenatchee National Forests to issue the final Environmental Assessment (EA) and to approve Crown Resources' Proposed Project (Alternative B) for the Buckhorn Mountain Project as soon as possible. We feel that the EA validates our support because it confirms that the Buckhorn Mountain Project can be built, operated, and reclaimed in a manner that is fully protective of the environment.

The project components for the Buckhorn Mountain Project that will be on public land (e.g., roads, utility corridors, fencing, and a water infiltration area) are well understood and, for the most part, not unique to a mining project. The lengthy EA document has examined all aspects of these facilities in every possible detail.

It is hard to imagine a more thoroughly studied project. Coupled with the multi-volume EIS that was prepared for the Crown Jewel project proposal, the Buckhorn Mountain Project is one of the most carefully studied projects in Washington State. It is time for this well understood, environmentally responsible project to become a reality.

Compared to the previous project proposal for a large open-pit mine, the underground mine will create dramatically fewer impacts. We find that Crown Resources has done an excellent job in designing the Buckhorn Mountain Project to eliminate or dramatically reduce the impacts that created the public concern and controversy surrounding the Crown Jewel Project. The EA demonstrates that this project will have minimal environmental impact both on and off of National Forest System lands.

Crown Resources' proposal to use the existing Kettle River mill near Republic rather than constructing a new mill near Buckhorn Mountain is of special interest to us. This plan represents the best of both worlds for Ferry and Okanogan Counties. Ferry County gets to keep the jobs associated with this milling facility whereas Okanogan County gets the mining jobs. This is truly a win-win situation for both counties. Crown Resources' willingness to change the project proposal to eliminate on-site milling at Buckhorn

Mountain also demonstrates the company's extraordinary efforts to work with area residents and to respond to their concerns.

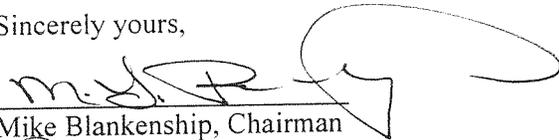
Putting the Buckhorn Mountain Project into production will allow the continued operation of the Kettle River Operation milling facility. It is thus essential that this project be permitted as soon as possible in order for the recently laid-off Kettle River mill workers to be put back on the payroll and to allow the laid-off mine workers to start working at the mine in Okanogan County.

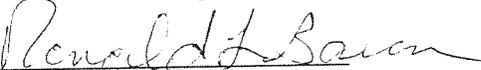
Although there remain a few vocal detractors, we know from talking to our constituents that the Buckhorn Mountain Project enjoys broad public support. This is not only due to the fact that this area sorely needs the jobs this project represents. It is also due in large measure to the widespread recognition that the revised project proposal to build the Buckhorn Mountain Project as an underground mine and to process the ore at the existing Kettle River mill represents a significant opportunity to develop a mine with the least possible impact upon the environment.

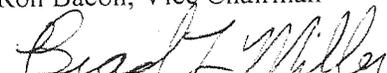
We have known the Kettle River Operations for over a decade. The company is an excellent corporate neighbor that has contributed so much to our community over the years. As an important part of the social and economic fabric of the area, it is essential that the company remain a part of this community.

Once again, we respectfully ask the U.S. Forest Service to issue the Final EA and the required project approvals for the Buckhorn Mountain Project as soon as possible in order to put the workers who have been recently laid off at the Kettle River Operations back to work, and to create the new jobs associated with the Buckhorn Mountain Project.

Sincerely yours,

  
Mike Blankenship, Chairman

  
Ron Bacon, Vice Chairman

  
Brad Miller, Member



#76

## Washington State Senate

110 Irv Newhouse Building  
PO Box 40426  
Olympia, WA 98504-0426

**Senator Bob Oke**  
26th Legislative District

Phone: (360) 786-7650  
FAX: (360) 786-7651  
Toll-free Hotline: 1-800-562-6000  
e-mail: oke.bob@leg.wa.gov

January 3, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As a member of the Washington State Legislature, I am writing to inform you of my support for the Buckhorn Mountain Project and to urge you in your role as Forest Supervisor of the Okanogan and Wenatchee National Forests to expedite issuance of the final Environmental Assessment (EA) and to approve the Buckhorn Mountain Project as soon as possible.

Although I do not represent the areas in which the mine and milling facilities are located, I believe this project is important to the entire state, which is why I am requesting that the permitting process be completed in the shortest amount of time possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

The Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs. Given the dire economic circumstances in Ferry County, these jobs are essential.

If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that there is significant public support for the Buckhorn Mountain Project in Okanogan and Ferry Counties. The redesigned project proposal for an underground mine and off-site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands. There is thus no reason to delay the approval of this important project.

I very much appreciate the opportunity to provide comments about the proposed Buckhorn Mountain Project.

Sincerely yours,

Senator Bob Oke  
26<sup>th</sup> Legislative District  
Washington State Legislature

**Committees:** Natural Resources, Ocean and Recreation, Ranking Republican Member • Transportation

STATE REPRESENTATIVE  
21ST DISTRICT  
BRIAN SULLIVAN

State of  
Washington  
House of  
Representatives



# 78  
NATURAL RESOURCES,  
ECOLOGY & PARKS  
CHAIR  
LOCAL GOVERNMENT  
TASK FORCE ON  
ECONOMIC COMPETITIVENESS  
VICE CHAIR  
TRANSPORTATION

January 5, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

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Although I do not represent the areas in which the mine and milling facilities are located, I believe this project is important to the entire state, which is why I am requesting that the permitting process be completed in the shortest amount of time possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

The Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs. Given the dire economic circumstances in Ferry County, these jobs are essential.

If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that there is significant public support for the Buckhorn Mountain Project in Okanogan and Ferry Counties. The redesigned project proposal for an underground mine and off-site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands. There is thus no reason to delay the approval of this important project.

STATE REPRESENTATIVE  
21st DISTRICT  
BRIAN SULLIVAN

State of  
Washington  
House of  
Representatives



NATURAL RESOURCES,  
ECOLOGY & PARKS  
CHAIR  
LOCAL GOVERNMENT  
TASK FORCE ON  
ECONOMIC COMPETITIVENESS  
VICE CHAIR  
TRANSPORTATION

I very much appreciate the opportunity to provide comments about the proposed Buckhorn Mountain Project. Please feel free to contact my office by phone, 360.786.7972, or e-mail, [Sullivan.Brian@leg.wa.gov](mailto:Sullivan.Brian@leg.wa.gov), with any questions or comments.

All My Best,

A handwritten signature in black ink that reads "Brian J. Sullivan".

State Representative Brian Sullivan  
Natural Resources, Ecology and Parks Committee, *Chair*  
21<sup>st</sup> Legislative District  
360/786-7972  
[Sullivan.Brian@leg.wa.gov](mailto:Sullivan.Brian@leg.wa.gov)



The Confederated Tribes of the Colville Reservation  
P.O. Box 150, Nespelem, WA 99155

(509) 634-2200  
FAX: (509) 634-4116



January 6, 2006

Jan Flatten  
For Forest Supervisor James Boynton  
United States Forest Service  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, WA 98840

RE: Buckhorn Mountain Access Road and Related Activities Project

Colville Confederated Tribes Environmental Trust program welcomes the opportunity to provide comment on the Buckhorn Mountain Access Road and Related Activities Project. The Colville Confederated Tribes are concerned about protection of water quality in both the San Poil and Kettle River drainages.

The overall mining project, of which proposed Forest Service road use is a part, will affect water quality and habitat in Marias and Toroda Creek within the Kettle drainage and pose a significant threat to water quality of the San Poil River. These will result from the widening and use of Marias Creek Road and increased tailing impoundment near Republic.

Based upon overall environmental significance of the mining project, it would seem the Forest Service has responsibility under the National Environmental Policy Act to consider environmental impacts of the entire project. Road use across National Forest is an integral and necessary part of Crown Resources Buckhorn Mine proposal, yet the Forest Service is performing an environmental assessment considering only a portion of the project.

Concerns regarding surface and ground water protection at the ore milling and tailings impoundment site were detailed previously in a letter to Department of Ecology. Some of the previous letter bears repeating because the disposal of tailings relies upon ore haul on the Forest Service Marias Creek Road. The tailing disposal facility is located beside the San Poil River approximately 13 miles north of the Colville Indian Reservation. From the facility location, the San Poil River flows through the center of the Reservation and past the community of Keller. The San Poil drains a major watershed within the Reservation, 330,000 acres. Quality of the water in this river is a matter of great concern to the Colville Tribes.

Excerpt from Colville Environmental Trust letter entitled, Comments on Draft Supplemental Environmental Impact Statement, Buckhorn Mountain Project, dated December 14, 2005:

“Tailings Disposal Facility

The DSEIS is lacking in several significant aspects related to the Kettle Mill tailings disposal facility (TDF). Tailings facility design as a function of seismic risk is manipulated to the proponent's benefit by discounting best available science on scale of the Maximum Credible Earthquake (MCE) and peak ground acceleration. Based in large part on the discounted design drivers, the DSEIS proposes the Kettle Mill TDF be expanded using a single 28 foot upstream raise. Upstream raise as a construction method for TDF is contrary to industry practice in areas of elevated seismic risk or significant uncertainty due to increased potential for liquefaction of tailings during earthquakes. Expert observers at the existing Kinross tailings facility have documented tailings are saturated and unstable as evidenced by shearing and displacement during previous bank emplacement. Wick drains in combination with downstream or centerline methods of increasing tailings facility capacity are inherently more stable and should be receive technical consideration in the SEIS.

Not only is the TDF under designed but the potential effect on fisheries, rivers, and streams of catastrophic TDF failure is seriously understated. TDF design considerations warrant protective engineering now rather than adaptive management when indicators of potentially catastrophic instability become apparent. While typically deferred to the permitting process, the magnitude of adverse consequences that could result from TDF failure and their relevance under SEPA compels careful examination within the SEIS. All Known Available and Reasonable Technology (AKART) is the benchmark for tailings dam design that should be applied at the Kettle Mill expansion.

#### Optional Tailings Disposal Facility

The possibility of catastrophic failure of the pipeline carrying tailings across North San Poil River to the alternative TDF and the adverse impacts to aquatic resources as a consequence are not adequately considered in the DSEIS and deserve specific attention in the SEIS. Hydrogeologic information necessary to understand the potential impact of the Optional TDF is absent from the DSEIS and must be fully developed in the SEIS.”

The remainder of this letter addresses impacts from delivery of fine sediment and road chemicals into Marias Creek that will result from road widening and industrial road use.

Buffer widths between the Marias Creek Road and the creek are not provided in the Environmental Assessment but are quite narrow. The document's Hydrology Section indicates 2.8 miles of road located within 300 feet of the stream. Often the road is located within 100 feet of the creek, and in places the existing single lane road is immediately adjacent the creek. With these short distances, most unsecured road sediment will reach the stream. Chemicals and salt used for road maintenance are also expected to migrate to the stream. Best management practices can at best partially solve this delivery problem caused in large part by the road location beside the stream.

Road location beside the creek dictates that sediment and chemical laden discharge from some cross drain culverts will directly enter the creek. In these instances, 100% of the sediment

generated by that portion of road draining to the cross drain culvert will be delivered to the creek. Longer cutslopes created by road widening are unlikely to revegetate incompletely. Discussion of the FS WEPP sediment erosion model indicates the analysis for this project assumed "average" conditions (pg 117), yet one of the parameters, traffic, generated by this project will be heavy for 13 to 15 years. Additionally, continued road use throughout spring breakup periods can be expected to substantially increase sedimentation over average conditions. Because of the topography and proximity to stream, any accidents or spills along this route will include a significant chance for chemical (petroleum products, coolant) delivery to the stream.

The Aquatics Section indicates that two reaches of Marias Creek currently have high levels of fine sediment, around 30%, impairing fish habitat. The document's Biological Evaluation estimates best management practices associated with the road will likely prevent total loss of Marias Creek's fish population from occurring. Yet loss of individual fish and spawning habitat is projected.

The EA document states the Forest Service would only shut haul down when haul is causing environmental damage (Pg 18). In light of the projected increase in sedimentation, it is apparently assumed the project and anticipated effects will not harm the environment. If this is the case, it is recommended a clear, easily measured threshold be established allowing daily on-site decisions regarding haul. It would be important the contractor be able to recognize this threshold.

Thank you for your careful consideration of these comments.

Sincerely,



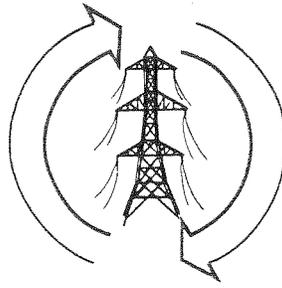
Gary Passmore  
Director  
Environmental Trust Department  
Colville Confederated Tribes

Cc: Derek Sandison, Director of Central Region, Department of Ecology

#82

BOARD OF COMMISSIONERS  
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DISTRICT NO. 3



Progress with Power  
P.O. Box 1039

ROBERTA B. WELLER, MANAGER

**PUBLIC UTILITY DISTRICT**

PHONE (509) 775-3325 / FAX (509) 775-3326

**NO. 1 OF FERRY COUNTY**

REPUBLIC, WASHINGTON 99166

January 4, 2006

Mr. James L. Boynton, Forest Supervisor  
% Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Ave. S.  
Okanogan WA 98840

Dear Mr. Boynton:

The Kettle River Operations in Ferry County, WA is our Utility's biggest consumer. We are contacting you to let you know that we support, whole-heartedly, the Buckhorn Mountain Project and to request that the WA Dept. of Ecology complete the permitting process for the Buckhorn Mountain Project as quickly as possible.

We know that Kettle River recently had to lay off a large number of employees because the mines in Ferry County have run out of ore. These are men and women with families who call Ferry County "home" and want to stay here. The Buckhorn Mountain Project is critical to the future of Kettle River because without that ore, the milling facility will have to close permanently.

We provide the electrical power for Kettle River Operations and have since they arrived in our area many years ago. Their accounts have been crucial to our Utility over these past years and still are today. They have been wonderful consumers and are most welcome in our area.

The preliminary Environmental Assessment recently published by the U.S. Forest Service clearly shows that the Buckhorn Mountain Project will be protective of the environment, both on and off of public land. This is an environmentally responsible project.

We urge you to realize the importance of issuing the permits for the Project as quickly as possible.

Regards,

ROBERTA B. WELLER  
Manager

#99



State of Washington  
Department of Fish and Wildlife

Mailing Address: 600 Capitol Way N, Olympia WA 98501-1091, (360) 902-2200, TDD (360) 902-2207  
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

January 9, 2006

Mr. James Boynton, Forest Supervisor  
United States Forest Service  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, Washington 98840

**SUBJECT: BUCKHORN MOUNTAIN ACCESS ROAD AND RELATED ACTIVITIES  
PROJECT ENVIRONMENTAL ASSESSMENT**

Dear Mr. Boynton:

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review and comment on the draft Environmental Assessment (EA) for this project. Please note that WDFW was not identified in the Chapter 4 list of agencies consulted during preparation of the report and our comments are in response to some specific proposals we have become aware of only recently. This EA pertains only to that portion of the project that is on United States Forest Service lands. Please refer to our December 13, 2005, response letter to the Draft Supplemental Environmental Impact Statement prepared by the Washington Department of Ecology for our comments related to the entire project. A copy of this letter was provided to Mr. Phil Christy of your office.

General Comments

The preferred alternative (B1) presented in the document is based on reconstruction of the Marias Creek road. We feel it is important to note that the Marias Creek road was originally built to design and stormwater control standards that would be considered substandard today. For example, the Marias Creek road was built too close to the stream to provide the buffers necessary to prevent road construction and maintenance impacts to the stream. There may not be sufficient area in the alignment to provide a reasonable level of stormwater treatment prior to discharging into the stream. A proposal to rebuild the road worsens this commitment to a less than desirable alignment.

The Kinross mining project on Buckhorn Mountain proposes significant improvements in upstream migration and fish use of Marias and Nicholson creeks for mitigation of mining related impacts. The impacts of road construction, operations, and disturbance of a larger road right-of-

way (prism) for Alternative B1 will compromise these mitigation benefits. Stormwater controls for the proposed road design should meet higher standards to protect these improvements.

The EA should note that the infiltration area is for treated wastewater discharged from the mine and functions as a disposal area. The water quality of the inflow is important, but so is the water quality of the outflow. The EA should analyze the treatment of this wastewater, particularly for metals and bioaccumulation of materials hazardous to aquatic resources, the travel times, and distance to streams that could be impacted by this discharge.

The design standard of using a 2- 3- and 24-hour duration storm for detention requirements and runoff control from the road surfaces may underestimate the storage required for longer duration snowmelt or rain-on-snow events. Larger storage capacity may be necessary to provide sediment control and water quality treatment for oils, grease, and metals prior to discharge to the streams.

The ease and cost of truck use of the different road alternatives during the life of the mine should not outweigh the long-term adverse environmental effects that may last for decades. The EA describes Alternative D as having significantly less environmental impacts on National Forest lands than the other alternatives. There is no discussion of the factors that led to Alternative B1 being chosen as the preferred alternative. Our view is that Alternative B1 requires additional fish and wildlife mitigation to be considered as an acceptable alternative. We provide recommendations in this letter for this additional fish and wildlife mitigation.

#### Specific Comments

**Pages 58, 59; LU-3, LU-4, LU-5** – This section describes actions to be taken to lessen the interactions between livestock and haul trucks that include fencing, water troughs, and a corral. We recommend that actions be taken to reduce the interactions between wildlife and haul trucks, also (specific recommendations below).

**Page 64, Erosion and Sedimentation** – As reported on page 137 of the EA, modeling suggests that sediment reaching Marias Creek will increase over current levels, even with the extensive sediment control measures that are proposed. Sediment levels in Marias Creek are already high enough that they are reducing the productivity of the stream. The EA suggests that additional sediment control measures, including off-stream sediment traps, tree/shrub plantings, etc., will be taken if monitoring indicates a need. We recommend that these additional measures be designed into the project upfront as the extensive road construction and use of the haul road is very likely to require them.

**Page 70, Wildlife and Fish Mitigation and Enhancement** – As described in the EA, mule deer will be impacted directly by vehicle/deer interactions and indirectly by loss of winter range use due to avoidance of haul road traffic. Since a large portion of the area through which the haul road passes is identified and managed for mule deer winter range, we recommend that additional mitigation measures be taken to further reduce this impact. Specifically, prescribed burning of decadent winter range areas would rejuvenate the browse, increasing its palatability and availability to mule deer. Careful siting of the prescribed burn areas could serve to draw deer

from the haul road vicinity and potentially reduce vehicle/deer interactions. We recommend approximately 100 acres/year of prescribed burns dedicated to this purpose for the life of the project, conducted by the USFS and funded by the mine proponent. If weather or permit conditions do not allow burning in any given year, those acres would roll forward. Coordination should occur between biologists of the USFS and WDFW to determine if the acres would be added to the next year's burn or to additional years following mine closure.

**Page 71, Wildlife Road Closures** – We recommend additional road closures to lessen the impacts of the new road and additional mine-related traffic on existing and reconstructed roads. These could be either seasonal or year-round closures depending on site-specific conditions and needs. A preliminary assessment indicates that USFS roads 3575-040, 3575-200, and 3575-150 (north of the 3575 main road) would be candidates for closure.

**Page 74, Creation of Pool Habitat in Marias and Nicholson Creeks** – The EA does not present enough information to determine if ten is the appropriate number of pools, or whether the proposed pools will be effective or will fill up with sand after the first high flows. We note background conditions in the streams are conducive to high rates of sand transport and the proposed roadwork will increase sediment loads. The EA should include performance standards for depth and area of the pools and steps to be taken to recover the habitat benefits lost by project failures. Additional unknowns are the linear extent of road that will have insufficient riparian buffer distance to the stream, and the potential for anchor ice or freeze-up to kill fish in the pools during the winter. If the pool projects are proven to be effective, we recommend that a new series of 10 pool structures be placed in these creeks during mine reclamation to offset long-term and continuing impacts of this project. Structures of this type usually have a maximum life expectancy of 10 – 30 years depending on the type and size of wood used, and whether the structures are impacted by storm events. Thus, the structures that are installed at the beginning of the project will be partially or mostly degraded by the time of mine closure.

Coordination is needed with WDFW on the design of the instream structures as these plans are further developed.

**Page 74, Notification Procedures in the Event of Wildlife Road Kill** – In addition to the notification procedure described, we suggest that adaptive management strategies, including triggers and goals, be required so that action can be taken as needed. Additionally, we recommend that a system of mile markers and/or GPS coordinates be employed to be better able to track where mortalities or observations of deer occur. Daily reporting of such information by the drivers and frequent reporting to the USFS and WDFW would be important to be able to monitor high use areas and to establish warning areas for high use crossings and direct adaptive management.

**Page 76, Water Resources Monitoring** – We suggest that adaptive management strategies, including triggers and goals, be required so that action can be taken if monitoring results warrant it.

We recommend that monitoring and maintenance and reporting schedules be developed and implemented for the sediment control measures that will be required. This will allow the USFS and mine proponent to take proactive action to prevent some sediment from reaching the stream.

**Page 79-80, Performance Securities** – In addition to reclamation and environmental protection costs, we recommend that the performance securities also provide adequate funds to cover environmental damages.

**Page 82, Table II-7** – The potential for toxic material added to the haul road surface to reach streams, riparian areas, and wetlands is described as high for the preferred alternative. We suggest that additional measures be required to avoid, lessen, and replace these impacts.

**Page 135, Other Direct/Indirect Effects Common to All Alternatives** – Sediment loads draining off of the haul road and cut slopes and delivered to the stream are expected to be extremely high without extensive road design and strict adherence to best management practices. Monitoring of sediment loads will be conducted and additional measures such as planting of trees and shrubs to intercept sediment could be implemented. By the time that monitoring detects the problem the impact to the aquatic populations will have occurred. Since Marias Creek already has 30 percent fines in the lower reaches and information on page 137 indicates that up to a 34 percent increase in fines is expected from this project, we suggest that all practical measures, including the tree and shrub plantings, be incorporated into the original design.

**Page 215, Cumulative Effects Common to All Species** – The patenting of the mine claim on Buckhorn Mountain has resulted in the transfer of wildlife habitat out of public ownership into private ownership. After mine closure, it is possible that these lands could be further developed resulting in additional impacts to wildlife and habitat. WDFW had reached agreement with the previous proponent, Battle Mountain, that the mine site would be protected as wildlife habitat following reclamation. We strongly recommend a similar agreement for this proposed project.

**Page 265, Mule Deer** – In the discussion of the potential impact of the haul road activity on mule deer, we note that the publication entitled “Impact of Roads on Big Game Distribution in Portions of the Blue Mountains of Washington, 1972-73,” by Charles Perry and Robert Overly, published in 1977 by the Washington Department of Game as Applied Research Bulletin No. 11, was not cited. This study was conducted mostly on USFS lands in the Blue Mountains and found that the impact extended up to ½ mile from the road. Since a significant portion of the haul road borders or traverses lands specifically identified as mule deer winter range, additional measures on USFS lands (prescribed burning to rejuvenate winter range browse) and on the private mitigation lands, to lessen or replace this impact should be required.

**Page 290, Table III-44** – This table reports that 760 acres of migratory bird habitat will be impacted by noise along the haul route. It does not appear that any mitigation is proposed for this impact. We recommend that additional mitigation be proposed on USFS lands and on the proponent’s mitigation lands. One form that this mitigation could take would be enhancement of riparian habitat through planting and cattle exclusion.

Mr. James Boynton  
January 9, 2006  
Page 5

**Additional Fish and Wildlife Mitigation Not On USFS Lands** – This EA pertains only to impacts and mitigation occurring on USFS lands. In addition to the mitigation recommended on USFS lands, WDFW is also recommending fish and wildlife mitigation on State and private lands. This has already occurred through our comments to the Draft Supplemental Environmental Impact Statement issued by the Washington Department of Ecology and will occur in more detail as we review the proponent's Aquatic Resources Mitigation Plan and Wildlife Habitat Plan.

Thank you for the opportunity to comment on this draft environmental assessment. We hope our comments are helpful in providing a more complete understanding of impacts to the fish and wildlife resource. We look forward to continued work with the United States Forest Service and the proponent toward a more complete fish and wildlife mitigation package.

Sincerely,

A handwritten signature in cursive script that reads "Chris Parsons".

Chris Parsons  
Regional Habitat Program Manager

Cc: Clyde Gillespie, Kinross Gold, Republic  
Holly Cushman, Ecology, Yakima  
Curt Leigh, WDFW, Olympia  
Teresa Eturaspe, WDFW, Olympia

#104



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

January 9, 2006

Reply To  
Attn Of: ETPA-088

Ref: 95-042-AFS

James Boynton, Forest Supervisor  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Assessment (EA) for the **Buckhorn Mountain Access Road and Related Activities**. We are submitting comments applicable under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA believes that information in the EA indicates there are potentially significant impacts to water quality, air quality and habitat on Forest Service lands that are not sufficiently described or mitigated to support a finding of no significant impact. These issues may best be addressed in the context of an environmental impact statement. Attached are EPA's detailed comments regarding these issues. Also, the EA relies on Washington Department of Ecology's Draft Supplemental Environmental Impact Statement (DSEIS) and incorporates the DSEIS by reference. EPA provided comments to the Department of Ecology on the DSEIS and we are including those comments that are relevant to the EA as well.

If you have questions or would like to discuss these comments, please contact Lynne McWhorter at (206) 553-0205, Patty McGrath, Regional Mining Coordinator at (206) 553- 0979 or me at (206) 553-1601. Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script that reads "Christine B. Reichgott".

Christine B. Reichgott, Manager  
NEPA Review Unit

Enclosure

## **EPA Detailed Comments on Buckhorn Mountain Access Road and Related Activities Environmental Assessment**

**Page 52, Management and Mitigation:** We appreciate that the EA discloses the potential effectiveness of the proposed mitigation measures. In some cases we have questions as to how the effectiveness was determined. These are described in the comments below related to mitigation.

**Page 57 and 66, WD-1 and WQ-2:** In the section on Management and Mitigation Measures, the EA states that water discharged into the infiltration gallery and from augmentation pipelines would meet state and federal water quality standards. However, there is no information presented in the EA to support this finding. There are no estimates of the expected water quality in comparison to baseline conditions and there is no description of the water treatment. Without this information the “high” effectiveness of this mitigation measure is questionable.

**Page 57, WD-2:** The EA states that the effectiveness of flow augmentation would be low-moderate. Further explanation is needed since reduction in stream flows could have significant impact on aquatic resources and both the Draft EA and Ecology’s Draft SEIS relies, in part, on this mitigation measure to determine that impacts will not be significant.

**Page 63, PFA-2:** We are encouraged by the statement that the performance security would include sufficient funds for correcting water quality problems, as well as reclamation, revegetation, and removal of facilities. The EA rates the effectiveness of this measure as “high”. However, the effectiveness is only high if the performance security is of an adequate amount to cover the potential costs. The EA should include an estimate for the performance security and a description of how the estimate was made in order to provide a basis for its determination that it would be highly effective.

**Page 69, Wetlands and Streams:** This section references Section 404 of the Clean Water Act, stating that “final details of wetland mitigation would be determined in the Corps of Engineers permits in consultation with the Forest Service on National Forest System land.” The Army Corps of Engineers has stated they will process Nationwide Permits for the proposed direct impacts to wetlands and streams. As a result, the full scope of impacts to wetlands, riparian areas and aquatic resources may not be mitigated within the Army Corps permit process. Therefore, we recommend that a robust mitigation plan be developed to fully addresses all direct, indirect and secondary impacts to aquatic resources.

**Page 69, WS-1: Culverts in Live Streams:** It is unclear what and where the “small wetlands” that “would be constructed above culverts on live streams to compensate for wetlands lost from culvert replacement” means. We recommend that the EA clarify and describe method, location and proposed size of “small wetlands”.

**Page 82, Comparison of Alternatives:** The EA states in Table II-7 that the potential is high for toxic materials added to the road surface to enter streams, riparian areas, and wetlands on Forest Service land for Alternative B, the Proposed Action. The high potential for toxics to affect

aquatic resources is a significant issue and should be mitigated in order to prevent fish kill and contamination of water resources in addition to the monitoring discussed.

**Pages 82, Table II-7, Comparison of Alternatives:** Alternative D appears to be the less environmentally damaging alternative from the aquatic resource impact standpoint (acres, linear feet of riparian areas, water quality, potential for toxic spills, etc.). For example, 19.2 acres of wetland riparian habitat conservation areas would be impacted from either Alternative B or B1, whereas Alternative D would not impact any. Alternative B or Alt B1 would likewise result in 3.9 miles of construction impacts within riparian habitat conservation areas, but only 150 linear feet would be impacted in the Alternative D alignment. We recommend that Alternative D be thoroughly evaluated and considered as the preferred alternative.

**Page 81-88, Table II-7 Comparison of Alternatives:** Rows 5 & 6 state that there will be no (“none”) stream temperature changes in either Marias or Nicholson creeks. We are concerned that there is the potential for stream temperature changes with up to 1 foot of drawdown predicted. Temperature changes can be caused by hydroperiod alterations.

Hydroperiod changes should be evaluated relative to impacts to biological communities of wetlands, seeps/springs, streams, and riparian areas in this table. This information should be provided in terms of linear feet downstream for streams, and duration of draw-down. For wetlands the estimated change in hydroperiod and seasonality should be assessed to address changes in biotic condition and communities (vegetation, amphibians, macro-invertebrates including Odonata, etc.). Such changes in hydroperiod could also significantly impact *Platanthera obtusata* (a sensitive wetland plant in the orchid family) found in this area (page 303). The impacts to this species (and other the wetland flora in general) should be assessed more precisely relative to projected hydrologic changes associated with the infiltration gallery. Such analysis should be further discussed in the Aquatic resources section (pp. 134-145); the Draft EA does not provide enough information to support the statement that the water augmentation would minimize groundwater losses and result in little change of water availability to fish. There are not enough details as to when and how augmentation would occur to support this.

**Pages 111-128, Hydrology:** This section describes the effects from the project on the hydrology. A portion of this section also describes water quality effects. The impacts of water quality should be addressed in a separate stand-alone section. The water quality discussion in the draft EA is limited to the impacts from the road. Expected water quality from the infiltration gallery should also be discussed (see comments above) and the cumulative water quality impacts from the Buckhorn Mine during operations and closure should be described.

**Page 118, Hydrology, Water Infiltration Gallery Effects:** According to the draft EA, treated water discharged into the infiltration gallery would not exceed 40 gallons per minute (gpm) and excess water would be routed to the Roosevelt Adit or wetlands in Marias Creek to supplement surface water flows. The EA should disclose how often and during what times of year excess water over 40 gpm will occur and the magnitude of the excess flows. The EA should describe when and how much of the excess flow will be routed to, each, the Roosevelt Adit and Marias Creek and the impacts this will have on water quality and aquatic resources.

**Page 131, Existing Conditions, Amphibians:** Page 131 and the Biological Evaluation (pp. 146-152) discusses the presence and potential impacts to the Columbia spotted frog (*Rana luteiventris*), a Federal Candidate species. No other amphibian species are addressed under the heading “Amphibians.” The section goes on to describe concerns about fish passage existing conditions in Marias and Nicholson Creek. More should be stated about the existing conditions of amphibian populations and potential impacts to them as a result of hydrologic changes from the infiltration gallery, impacts from haul road routes, and cumulative effects (the combined effects of the various projects).

**Page 132, Existing Conditions, Wetlands, Seeps and Springs:** The statement, “These wetlands do provide excellent habitat for Columbia spotted frogs, tree frogs, western toads, and long-toed salamanders” is made for both Marias and Nicholson Creeks. However, no evaluation of impacts to these amphibians is provided in the impact section and there is no discussion of Tiger salamander in the area. Please more fully evaluate impacts to amphibian populations.

**Page 134-145, Aquatic Resources Environmental Consequences:** The EA states that water from mine operations that would be infiltrated into the infiltration gallery, would “result in little change to water availability to fish.” It is concluded that increased flows to Nicholson and Marias Creek from the infiltration gallery will have a positive effect. However, there is no analysis of the timing, duration or magnitude of flows that would be discharged to Nicholson and Marias Creek (or their headwater wetlands). We are concerned that changes in hydroperiod can have adverse affects biotic communities including wetland and stream functions. The EA focuses on downstream populations of fish, but does not address the potential change in hydroperiod that could impact other aquatic organisms and wetland plant communities.

**Page 137, Alternative B & B1: Marias Haul Route (preferred alternative):** The EA states that the existing sediment load from the road along Marias creek already impairs spawning habitat for fish in Marias Creek. Modeling predicts 34% increased sediment loading over the present condition. Mitigation to address this significant increase in sediment loading is implementation of various sediment detention methods. A detailed and enforceable monitoring plan is needed to ensure these measures function. However, the type, frequency and responsible party for monitoring is not explicitly described, nor the mechanism for enforcement such monitoring. We recommend that the EA include a commitment to develop a detailed mitigation and monitoring plan that is enforceable.

**General Comment (relevant to statements in cumulative impact sections, such as p. 156 5<sup>th</sup> paragraph):** We believe that the EA does not thoroughly assess cumulative adverse impacts. It should look at the proposed action (and respective alternatives) in the context of existing, past and reasonably foreseeable projects in the area. The EA provides a list of other activities yet defers to the DSEIS stating, “Any water flow change . . . would be a direct or indirect effect of the Buckhorn mining project, which is discussed in the Washington State DSEIS.” As a result there is no analysis in the EA of these cumulative effects. This approach does not achieve the goal of a cumulative impact analysis, which in essence is to evaluate the synergistic effects of all projects rather than defer to discussion of “direct and indirect” effects in other documents.

We recommend that the Forest Service complete a thorough cumulative effects analysis in the document.

**Page 160, Air Quality, Environmental Consequences:** The EA states that the proponent is proposing to use water and salts to aid in dust stabilization. We are concerned about the impacts to air quality from emissions and dust and the fact that the EA states that the airshed is currently “unclassified” because there is not sufficient information available to provide a classification and therefore, we are unsure at the ability of the project to determine the extent of air quality impact. We are also concerned of the use of water and magnesium chloride and their potential impacts to surface and ground water quality, soils, and vegetation. The EA discusses the use of salt in the winter for traction and the potential impacts to aquatic resources. However, the EA does not discuss the additional and cumulative impacts to aquatic resources, soils, or vegetation from salt use for dust suppression during other seasons. We recommend that the EA discuss the potential impacts from this activity as well as how impacts to air quality will be determined since the EA lacks site specific airshed data.

**Page 167, Air Quality, Environmental Consequences:** Table III-23 lists the criteria pollutants along with time, modeled concentration, ambient air quality standard, and percentage of ambient air quality standard. It appears that these predictions are for the project construction and operation only and does not include the cumulative affects of other activities such as prescribed fire. We recommend providing quantitative information regarding the cumulative impacts of mine operation (including transportation) along with other activities to determine potential impacts to air quality.

#113

STATE REPRESENTATIVE  
19th DISTRICT  
BRIAN BLAKE

State of  
Washington  
House of  
Representatives

CAPITAL BUDGET  
ECONOMIC DEVELOPMENT,  
AGRICULTURE & TRADE  
NATURAL RESOURCES,  
ECOLOGY & PARKS  
RULES

January 9, 2006



Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As a member of the Washington State Legislature, I am writing to inform you of my support for the Buckhorn Mountain Project. I urge you in your role as Forest Supervisor of the Okanogan and Wenatchee National Forests to expedite issuance of the final Environmental Assessment (EA) and to approve the project as soon as possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. The Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that there is significant public support for the Buckhorn Mountain Project in Okanogan and Ferry Counties. The redesigned project proposal for an underground mine and off-site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands. There is thus no reason to delay the approval of this important project.

I appreciate the opportunity to provide comments about the proposed Buckhorn Mountain Project.

Sincerely,

Brian Blake  
State Representative, 19<sup>th</sup> District

LEGISLATIVE OFFICE: 339 JOHN L. O'BRIEN BUILDING, PO BOX 40600, OLYMPIA, WA 98504-0600 • 360-786-7870

E-MAIL: blake.brian@leg.wa.gov

TOLL-FREE LEGISLATIVE HOTLINE: 1-800-562-6000 • TDD: 1-800-635-9993

PRINTED ON RECYCLED PAPER

CATHY McMORRIS  
5TH DISTRICT, WASHINGTON

COMMITTEES:

RESOURCES

ARMED SERVICES

EDUCATION AND THE WORKFORCE  
VICE CHAIR OF SELECT EDUCATION

ASSISTANT WHIP

# Congress of the United States House of Representatives

January 9, 2006

COUNTIES:

ADAMS  
ASOTIN  
COLUMBIA  
FERRY  
GARFIELD  
LINCOLN  
OKANOGAN  
PEND OREILLE  
SPOKANE  
STEVENS  
WALLA WALLA  
WHITMAN

Mr. James Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Ave South  
Okanogan, WA 98840

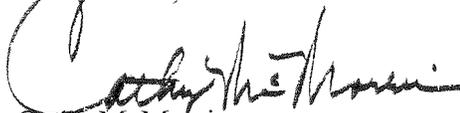
Dear Mr. Boynton,

It is with pleasure that I express my wholehearted support for the Buckhorn Mountain Project and urge the Forest Service to issue its final Environmental Assessment and Record of Decision so this project may once and for all move forward.

I have observed the evolution of this proposed mine during my tenure as a former State Representative to the 7th Legislative District and currently as Congresswoman to the Fifth Congressional District. There is no project that has received greater scrutiny over the years by the permitting agencies and the public. I am confident that the proposed Buckhorn project was designed to address the permitting agencies' and public's concerns from the former Crown Jewell project as well as create win-wins for the economies of both Ferry and Okanogan Counties. And I am pleased that the United States Forest Service's proposed action in its draft Environmental Assessment states very clearly its intent to approve this most important project.

There is no reason at this juncture to delay this project any longer and I would hope that the Okanogan/Wenatchee National Forests under your leadership continues to place this project as its highest priority for completion. The jobs this project will create are incredibly vital for the communities I represent.

Best Wishes,



Cathy McMorris  
Member of Congress

CMC/ss

1708 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-2006  
FAX: (202) 225-3392

10 NORTH POST STREET, SUITE 625  
SPOKANE, WA 99201  
(509) 353-2374  
FAX: (509) 353-2412

555 SOUTH MAIN  
COLVILLE, WA 99114  
(509) 684-3481  
FAX: (509) 684-3482

29 SOUTH PALOUSE STREET  
WALLA WALLA, WA 99362  
(509) 529-9358  
FAX: (509) 529-9379

Email: [cathy.mcmorris@mail.house.gov](mailto:cathy.mcmorris@mail.house.gov) Visit: [www.mcmorris.house.gov](http://www.mcmorris.house.gov)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

January 24, 2006

Reply To  
Attn Of: ETPA-088

Ref: 95-042-AFS

James Boynton, Forest Supervisor  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, WA 98840

RE: Draft Environmental Impact Assessment for the Buckhorn Mountain Access Road  
and Related Activities

Dear Mr. Boynton:

The purpose of this letter is to clarify our positions as stated in the January 9, 2006, cover letter accompanying our comments on the Draft Environmental Impact Assessment (EA) for the project referenced above. In that letter, we stated that information in the EA indicates there are potentially significant environmental impacts on Forest Service lands that are not sufficiently described or mitigated to support a finding of no significant impact. We want to be clear that we acknowledge and respect that the decision to issue a finding of no significant impact (FONSI) or develop an Environmental Impact Statement (EIS) is within the purview and authority of the Forest Service. It is not our intention to prejudice the final Forest Service decision.

Our comment pertained to the existing draft document. Our specific comments attached to the letter identified sections of the draft EA that, as currently written, may not support a finding of no significant impact. These issues can be readily addressed as the document is finalized and we will provide any support or further information that you may desire to move forward.

Our January 9, 2006, letter also stated that the potential impacts may best be addressed in the context of an EIS. It is the Forest Service's responsibility to determine if an EIS is necessary. EPA's "Policy and Procedures for the Review of Federal Actions Impacting the Environment" does detail a multi-step process for EPA to work with another Federal Agency in those cases when EPA determines that the Federal Agency has not or does not plan to prepare an EIS on an action that the EPA believes could significantly affect the quality of the environment. We have not made such a determination in this case and we have not invoked that process. Our statement was a suggestion, not a determination.

As a further point of clarification, the concerns EPA expressed may also be addressed with development and implementation of appropriate mitigation. If appropriate mitigation is included in the scope of the project, then the issuance of a FONSI would be appropriate.

I apologize for any confusion that our comment letter created. I trust that this letter addresses the concerns that you have raised and we have discussed. The public comment period is the only opportunity for EPA to formally comment on federal projects before the decision is made. We have learned that it is very important for EPA to be clear about conclusions that may be drawn from the draft NEPA document and about concerns as to the adequacy of effects disclosure. We are very supportive of the environmental programs of the Okanogan and Wenatchee National Forests and look forward to opportunities to continue working with you.

Sincerely,

A handwritten signature in cursive script, reading "Christine B. Reichgott".

Christine B. Reichgott, Manager  
NEPA Review Unit

cc: Karen Mollander, USFS

BOARD OF COMMISSIONERS

CHRIS A. KROUPA

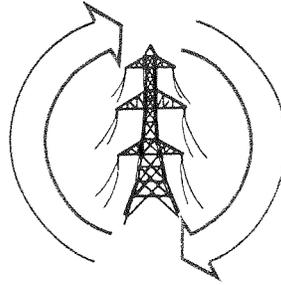
KATHRYN L. "KATHY" CIAIS

GREGG B. CAUDELL

DISTRICT NO. 1

DISTRICT NO. 2

DISTRICT NO. 3



*Progress with Power*  
P.O. Box 1039

ROBERTA B. WELLER, MANAGER

**NO. 1 of FERRY COUNTY**  
REPUBLIC, WASHINGTON 99166

**PUBLIC UTILITY DISTRICT**

PHONE (509) 775-3325 / FAX (509) 775-3326

August 23, 2006

Forest Supervisor, James Boynton  
Okanogan Valley Office  
Attention Jan Flatten  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Forest Supervisor Boynton:

We are again appreciative of being given the opportunity to provide our comments on the Buckhorn Project.

Ferry County P.U.D. No. 1 of Ferry County wholeheartedly supports the Buckhorn Project. Crown Resources and other participating entities have proven to be worthy and are good neighbors to all.

We ask that your review of the responses be quick and your approval of the Access Project, as submitted by Crown Resources, also be quick so that we may all move on and help the economy of our economically deprived counties.

Best regards,

A handwritten signature in cursive script that reads "Robbi Weller".

Roberta B. Weller  
Manager



**Confederated Tribes of the Colville Reservation**

Natural Resources Department - Environmental Trust Soils Office

P.O. Box 150 Nespelem, WA 99155 Phone: (509) 634-2414 Email: [skye.cooley@colvilletribes.com](mailto:skye.cooley@colvilletribes.com)

*Aug 29, 2006*

**To:** *Jan Flatten*

**From:** *Skye Cooley  
Soil Scientist*

**Subject:** *Buckhorn Access Project*

*Please find enclosed geoscience references  
bibliography for Colville Reservation +  
surroundings.*

*SC*

STATE REPRESENTATIVE  
19th DISTRICT  
~~BRIAN~~ BLAKE

State of  
Washington  
House of  
Representatives



DEIS-14  
CAPITAL BUDGET  
ECONOMIC DEVELOPMENT,  
AGRICULTURE & TRADE  
NATURAL RESOURCES,  
ECOLOGY & PARKS  
RULES

October 4, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As a member of the Washington State Legislature, I am writing to inform you of my support for the Buckhorn Mountain Project and to urge you to expedite issuance of the final Environmental Impact Statement (EIS) and to approve the Buckhorn Mountain Project as soon as possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs.

If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that the redesigned project proposal for an underground mine and off-site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands

I appreciate the opportunity to provide comments about the proposed Buckhorn Mountain Project.

Sincerely,

Brian Blake



State of Washington  
Department of Fish and Wildlife

Mailing Address: 600 Capitol Way N, Olympia WA 98501-1091, (360) 902-2200, TDD (360) 902-2207  
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

October 9, 2006

Mr. James Boynton, Forest Supervisor  
United States Forest Service  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, Washington 98840

**SUBJECT: BUCKHORN ACCESS PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Dear Mr. Boynton:

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for this project. We appreciate the changes that have been made to improve this project over the past year.

Specific Comments

**Page 70, Erosion and Sedimentation** – We remain concerned about the impacts of increased sedimentation from road construction, heavy vehicle traffic, and maintenance operations on the Marias Creek road. Approximately 65 percent of FR3550 is proximate to streams, cross-culverts added when the road is upgraded will flow into Marias Creek, and 5.3 miles of FR3550 and FR125 is generally about 50 feet away from Marias Creek. The project includes truck traffic of 100 trips per day (hauling ore outbound, hauling backfill inbound) with heavy trucks (30 to 32 ton loads) every day for at least 7 years. It would appear that maintenance of the gravel running surface and road crown alone for this kind of use will require many tons of new rock to be added to the road every year. Additional sediment could also be produced from the erosion on the cut and fill slopes, grading operations, and cleaning the ditches. It is our concern that 50 feet of separation between the road and creek is not enough to contain this material and prevent impacts to fish and fish habitat. Monitoring of turbidity in the stream and monitoring of the erosion control structures are proposed but no monitoring of the potential impacts to the stream is proposed. At the end of mining and haul road use, we recommend that the USFS or Crown/Kinross conduct monitoring of the stream habitat condition, with particular emphasis on sedimentation issues. The information derived from this monitoring should be provided to WDFW and other interested parties for review and used to direct needed stream restoration. The USFS or Crown/Kinross should prepare a draft stream restoration plan, with review by WDFW, and implement the plan.

Mr. James Boynton

October 9, 2006

Page 2

**Page 77, Wildlife and Fish Mitigation and Enhancement** – As described in the DEIS, mule deer will be impacted directly by vehicle/deer interactions and indirectly by loss of winter range use due to avoidance of haul road traffic. Since a large portion of the area through which the haul road passes is identified and managed for mule deer winter range, we have recommended that additional mitigation measures be taken to further reduce this impact. Specifically, prescribed burning or timber-stand-improvement of decadent winter range areas would rejuvenate the browse, increasing its palatability and availability to mule deer. Careful siting of the treated areas could serve to draw deer from the haul road vicinity and potentially reduce vehicle/deer interactions. We have reached agreement with Crown/Kinross that they will provide \$40,000 to be used for prescribed burns and/or timber stand improvements for these purposes on public and private lands in the area (see page 19 of the Habitat Mitigation Plan, Buckhorn Mountain Project, July 20, 2006). USFS lands will be eligible to receive some of these funds. We recommend that this information be included in the FEIS.

**Page 77, Creation of Instream Habitat Improvements in Marias and Nicholson Creeks** – With the recent issue that has arisen concerning the mitigation project at the mouth of Marias Creek, it may be necessary to re-visit the creation of instream habitat improvements in Marias and Nicholson creeks. If the creation of instream habitat improvements is chosen to replace the project at the mouth of Marias Creek, we recommend that structures be placed at the beginning of the mining project and again at the end of mining (during reclamation). This would alleviate the concern about the potential longevity of the projects and offset long-term and continuing impacts of this project.

Coordination is needed with WDFW on the design of the instream structures as these plans are further developed.

**Page 78, Wildlife Road Closures** – In our January 9, 2006, comments to the USFS Draft EA, we recommended additional road closures. It is our understanding that in subsequent discussions with USFS personnel there was a commitment to check the status of roads that have been closed in the past and “unofficial” roads that have been opened by the public and ensure that those roads are closed. This information should be added to this section.

Thank you for the opportunity to comment on this DEIS. We hope our comments are helpful in providing a more complete understanding of impacts to the fish and wildlife resource. We look forward to continued work with the United States Forest Service and the project proponent.

Sincerely,



Chris Parsons

Regional Habitat Program Manager

Mr. James Boynton

October 9, 2006

Page 3

Cc: Kevin Eppers, Kinross Gold, Republic  
Holly Cushman, Ecology, Yakima  
Curt Leigh, WDFW, Olympia  
Teresa Eturaspe, WDFW, Olympia



**Olympia Office:**  
 115D Irv Newhouse Building  
 PO Box 40407  
 Olympia, WA 98504-0407  
 Phone: (360) 786-7612  
 FAX: (360) 786-1999  
 E-mail: morton.bob@leg.wa.gov

## Washington State Senate

**Senator Bob Morton**  
 7th Legislative District

**District Office:**  
 3278 Pierre Lake Road  
 Kettle Falls, WA 99141  
 Phone: (509) 684-5132

October 5, 2006

Mr. James L. Boynton, Forest Supervisor  
 c/o Ms. Jan Flatten  
 Okanogan and Wenatchee National Forests  
 1240 Second Avenue South  
 Okanogan, WA 98840

Dear Mr. Boynton:

As the State Senator representing District 7, which covers the Buckhorn Mountain project area in Okanogan County and the Kettle River Operations in Ferry County, I am writing to urge the U.S. Forest Service, Okanogan and Wenatchee National Forest to issue the final Environmental Impact Statement (EIS) and to approve Alternative B (Crown Resources Corporation's proposal) for the Buckhorn Mountain Project as soon as possible. The Forest Service should consider the Buckhorn Mountain Project to be a very simple project proposal to use public lands for access to the project, a utility corridor, fences, and an infiltration gallery.

The EIS is a comprehensive document that clearly reveals this is an environmentally responsible project. As explained in the EIS, the Buckhorn Mountain Project will have minimal environmental impacts on and off of National Forest System lands. This document confirms my long-held belief that the Buckhorn Mountain Project can be built, operated, and reclaimed in a manner that is fully protective of the environment.

This area has waited far too long for this project to become a reality. We need the jobs and economic activity this project will provide. I cannot imagine a more thoroughly studied project. Without a doubt, it is one of the most carefully studied projects in the history of Washington State. The Buckhorn Mountain Project should not have to do any more studies or jump over any more hurdles. It should be approved without further delay.

We all remember the controversy over the Crown Jewel Project. Those days are gone. The vast majority of my constituents support the Buckhorn Mountain Project and are anxious to see this project developed. People understand that the revised project proposal for an underground mine and off-site milling represents a significant opportunity to develop a mine with the least possible impact upon the environment. It also represents the best opportunity to maintain and create high-paying jobs, which are sorely needed in this economically challenged part of Washington State. With the mine in Okanogan County and the mill in Ferry County, this project is a win-win for both areas.

Please do not let the few vocal detractors delay approval of this project. The company has gone the extra mile to work with the community and to address residents' concerns about traffic along the road. We should all recognize that there are a few anti-mining activists in the area who simply do not want to see this project or any mining project developed.

Putting the Buckhorn Mountain Project into production will allow the continued operation of the Kettle River Operation milling facility. In addition to being an essential component of the economy of the region, the Kettle River Operations is an excellent corporate neighbor that has contributed so much to the community for more than a decade. It is thus essential that this project be permitted as soon as possible in order for the recently laid-off Kettle River mill workers to be put back on the payroll and to allow the laid-off mine workers to start working at the mine in Okanogan County.

Once again, I wish to stress the importance of issuing the Final EIS and approving Alternative B for the Buckhorn Mountain Project as soon as possible.

Cordially yours,

A handwritten signature in cursive script that reads "Bob Morton".

BOB MORTON  
State Senator

STATE REPRESENTATIVE  
7th DISTRICT  
BOB SUMP

State of  
Washington  
House of  
Representatives

STATE GOVERNMENT  
COMMERCE & LABOR  
TECHNOLOGY,  
TELECOMMUNICATIONS  
& ENERGY



October 5, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As the elected representative for District 7, Position No. 1, I am writing to express my support for the Buckhorn Mountain Project. I urge you to issue the final Environmental Impact Statement (EIS) for the Buckhorn Mountain Project as soon as possible.

The Kettle River Operations recently had to layoff a substantial portion of its workforce and this has led to devastating financial consequences for many residents of the town of Republic. The current lack of employment opportunities in Ferry County is reaching a crisis level and as soon the permits for the Buckhorn Mountain Project are issued, we can get many of these people back to work.

The proposed use of National Forest lands for the access road, utility corridor, fencing, and the infiltration basin appear to be straightforward, necessary and appropriate. The EIS thoroughly examines all aspects of these facilities and reveals that there are very few environmental concerns associated with the Buckhorn Mountain Project either on or off of public land and I haven't been made aware of any substantial concerns that should lead to the delay of project approval.

Again, I urge the Forest Service to issue the Final EIS and to approve the Buckhorn Mountain Project as soon as possible. Further delays will prove to be extremely detrimental to my community and my constituents.

Sincerely,

Bob Sump  
State Representative  
7<sup>th</sup> Legislative District

STATE REPRESENTATIVE  
24th DISTRICT  
JIM BUCK

State of  
Washington  
House of  
Representatives

NATURAL RESOURCES,  
ECOLOGY & PARKS  
RANKING MEMBER  
TRANSPORTATION



October 5, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As a member of the Washington State Legislature, I am writing to inform you of my support for the Buckhorn Mountain Project and to urge you in your role as Forest Supervisor of the Okanogan and Wenatchee National Forests to expedite issuance of the final Environmental Impact Statement (EIS) and to approve the Buckhorn Mountain Project as soon as possible.

Although I do not represent the areas in which the mine and milling facilities are located, I believe this project is important to the entire state, which is why I am requesting that the permitting process be completed in the shortest amount of time possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

The Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs. Given the dire economic circumstances in Ferry County, these jobs are essential.

If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that there is significant public support for the Buckhorn Mountain Project in Okanogan and Ferry Counties. The redesigned project proposal for an underground mine and off-site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands. There is thus no reason to delay the approval of this important project.

I very much appreciate the opportunity to provide comments about the proposed Buckhorn Mountain Project.

Sincerely,

A handwritten signature in cursive script that reads "Jim Buck".

JIM BUCK  
State Representative  
24<sup>th</sup> Legislative District



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
500 NE Multnomah Street, Suite 356  
Portland, Oregon 97232-2036



9043.1  
IN REPLY REFER TO  
ER06/842

October 10, 2006

James Boynton  
Forest Supervisor  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Buckhorn Access Project, Okanogan and Wenatchee National Forests, Okanogan County, Washington. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Preston A. Sleeper  
Regional Environmental Officer

STATE REPRESENTATIVE  
21st DISTRICT  
BRIAN SULLIVAN

State of  
Washington  
House of  
Representatives



DEIS-41

NATURAL RESOURCES,  
ECOLOGY & PARKS  
CHAIR  
LOCAL GOVERNMENT  
TRANSPORTATION

October 9, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

As a member of the Washington State Legislature, I am writing to inform you of my support for the Buckhorn Mountain Project and to urge you in your role as Forest Supervisor of the Okanogan and Wenatchee National Forests to expedite issuance of the final Environmental Impact Statement (EIS) and to approve the Buckhorn Mountain Project as soon as possible.

Although I do not represent the areas in which the mine and milling facilities are located, I believe this project is important to the entire state, which is why I am requesting that the permitting process be completed in the shortest amount of time possible.

The Buckhorn Mountain Project will bring jobs to an economically depressed part of our state. These jobs and the economic engine that will be created by this project can make a critical difference to Ferry County, which is teetering on the verge of bankruptcy.

The Kettle River Operations is the largest private-sector employer in Ferry County. The company recently had to lay off a significant portion of its workforce because the mines in Ferry County have run out of ore. Bringing the Buckhorn Mountain Project on line will allow these workers to return to work plus generate new jobs. Given the dire economic circumstances in Ferry County, these jobs are essential.

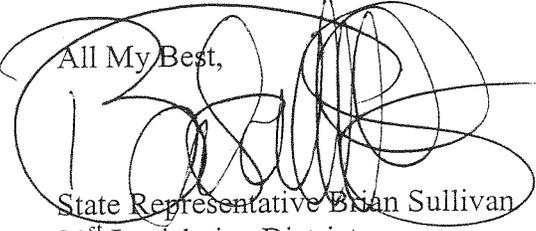
If Ferry County is forced to declare bankruptcy, there will be an adverse ripple effect throughout the state. The State Legislature will have to find a way to assist the county in this financial crisis. As a state legislator, my responsibilities extend beyond the boundaries of my district when it comes to economic issues that have statewide importance. I am thus very anxious to see the Buckhorn Mountain Project approved so it can become a partial solution to the financial challenges facing this region.

I understand that there is significant public support for the Buckhorn Mountain Project in Okanogan and Ferry Counties. The redesigned project proposal for an underground mine and off-site processing at the existing Kettle River Operations eliminates the environmental concerns associated with the previous proposal for an open-pit mine.

I also understand that the use of public lands for this project is both modest and appropriate. The access roads, utility corridor, fencing, and infiltration basin that will be built on public lands administered by the U.S. Forest Service are necessary components of the mining project, which will occur on private land, and will have no significant impact on or off of public lands. There is thus no reason to delay the approval of this important project.

I very much appreciate the opportunity to provide comments about the proposed Buckhorn Mountain Project.

All My Best,



State Representative Brian Sullivan  
21<sup>st</sup> Legislative District



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

October 13, 2006

Reply To  
Attn Of: ETPA-088

Ref: 95-042-AFS

James Boynton, Forest Supervisor  
Okanogan Valley Office  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for **Buckhorn Access Project** (CEQ No. 20060345) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures we evaluate the EIS document's adequacy in meeting NEPA requirements.

This draft EIS evaluates the no action alternative and four alternatives related to access to the Buckhorn mine site via Forest Service land, fence construction, and an infiltration system for disposal of treated water from the mine site. Alternative B is the Proposed Action; Alternative B1 is the Proposed Action with modifications; Alternative C was designed to use a different ore, supply, and employee access route; and Alternative D was designed to result in the least impacts to National Forest lands. The draft EIS identifies Alternative B1 as the Preferred Alternative.

Based on our review we have rated the Preferred Alternative EC-2 (Environmental Concerns-Insufficient Information). This rating and a summary of our concerns will be published in the *Federal Register*. A summary of the rating system we have used in conducting our review of the DEIS is enclosed for your reference.

EPA is pleased that the Forest Service prepared an EIS and we appreciate the consideration of the comments that we provided on the Environmental Assessment (EA). We feel that the EIS provides more detailed analysis for the public to review and allows for a better decision making process. EPA's main concerns with this document are the need to correct information about water resources and enforcement of monitoring and mitigation to be consistent with the latest information in the final Washington State Department of Ecology's State Supplemental Environmental Impact Statement (SEIS). The draft EIS relies on incorrect data in

the draft SEIS document, which has been corrected in their final SEIS. We understand that the draft EIS was developed when the information in the draft SEIS document was the most current; however, since the publication of the draft SEIS, additional modeling and analysis was conducted. Ideally, the federal NEPA and State SEIS processes would have been coordinated so that a review of both documents could be conducted concurrently since they refer to one another. Unfortunately, since these documents were apparently not coordinated, the draft EIS contains incorrect information and analysis, which limits our ability to make relevant comments about its completeness or prediction of impacts. The other main concern is about monitoring/mitigation. Although the document addresses a number of mitigation measures to offset impacts to aquatic resources, it is unclear what enforcement mechanism would ensure their implementation. A final concern relates to the Preferred Alternative. We support an alternative that contains the least environmentally damaging components and at this point Alternative D appears to be the most protective.

Detailed comments from our review of the draft EIS are enclosed. Our comments mainly focus on those components that relate to water quality and aquatic resources. We believe a thorough review of the draft EIS would require the review of the final SEIS. Because the comment periods did not overlap much for both documents, this was difficult to accomplish. We do appreciate the time Forest Service staff provided to work with us to identify inconsistencies and discuss our concerns. We are reviewing the final SEIS and will be providing comments on that document to the Department of Ecology and we recommend that the Forest Service also consider these comments in the development of the final EIS.

Thank you for the opportunity to comment on the draft EIS. If you have questions or would like to discuss these comments, please contact Lynne McWhorter at (206) 553-0205, Patty McGrath, Regional Mining Coordinator at (206) 553-0979 or me at (206) 553-1601.

Sincerely,

//s//

Christine B. Reichgott, Manager  
NEPA Review Unit

Enclosures

## **EPA Detailed Comments on Buckhorn Mountain Access Road and Related Activities Draft Environmental Impact Statement (DEIS)**

### **General Comments**

EPA supports the development of an EIS for this project. Our review indicates that the draft EIS has many improvements compared to the Environmental Assessment. We appreciate that many of our comments were considered and incorporated in the draft EIS. We believe that the section on cumulative impacts, which is included in each resource section, contains more information and analysis that allows the reader to understand the impacts in a broader sense. We understand from speaking with Forest Service staff that the final EIS will include more analysis on water quality and quantity based on additional modeling and information that was received after the development of the draft EIS. We will look forward to reviewing final document with more accurate data included in the analysis and discussion. Also, we recommend that where the final EIS references the final Washington State Department of Ecology's Environmental Impact Statement (SEIS) document, that sections and page numbers be included. Currently, we are reviewing the final SEIS and will be providing comments on the aspects such as the more recent modeling that may be relevant to this draft EIS and the development of the final EIS.

### **Inconsistent information between the draft EIS and the final SEIS**

The draft EIS refers to information and conclusions from the draft SEIS. We recommend that the final EIS incorporate information from the final SEIS and EPA's corresponding comments on the final SEIS. For example, between the draft SEIS and the final SEIS there are changes to the water quantity and quality predictions, additional National Pollution Discharge Elimination System (NPDES) outfalls identified, changes to the monitoring, additional wetlands impacts identified, additional mitigation measures, etc. Please update this information in the final EIS.

The final SEIS identifies four outfalls (001 through 004), while the draft EIS identifies only one NPDES outfall (from the infiltration gallery, which is outfall 001) and three augmentation locations. The draft EIS should use the same terminology as the final SEIS and clearly describe for each outfall, the location (including whether or not on USFS land), discharge characteristics, and effectiveness of treatment technology for meeting limits. If the outfalls are located on Forest Service land, then the draft EIS needs to discuss the impacts on water and aquatic resources from these discharges.

Based on our conversation with Forest Service Staff, it is our understanding that water discharged from the infiltration gallery would be required to meet the more stringent standard (e.g. drinking water versus surface water). Currently, the draft EIS states that water discharged from the infiltration gallery would be required to meet State ground water quality standards (pg 32 and 72). While the final SEIS states that water would be treated to meet surface water quality standards. The final EIS should reflect the correct information and discuss the treatment that will be utilized to ensure that standards are met.

The draft EIS rates flow augmentation (WQ-3) as moderately effective since flows would only be replaced during the growing season in some creeks and some flow loss in Myers Creek

would not be augmented (pg 73). However, the final SEIS states that flow augmentation would be highly effective. Flow augmentation can be highly effective if it occurs whenever needed and at a location, volume, and quality that is consistent with the flow that is being replaced. The final EIS needs to discuss whether or not this will occur and how (i.e., which permits will include requirements for flow augmentation).

### **Preferred Alternative**

The draft EIS identified Alternative B1 as the preferred alternative. However, there is no detailed discussion regarding why Alternative B1 was selected instead of Alternative D which has fewer environmental impacts. We recommend that the final EIS describe the rationale for selecting Alternative B1. Moreover, from an aquatic resources standpoint it appears that Alternative D is the least environmentally damaging alternative. Alternative D would minimize or eliminate impacts to aquatic resources in the following ways with respect to Alternative B1:

- a. avoid impacts to 3.9 miles of construction within riparian habitat conservation areas on NFS lands or right-of-ways,
- b. avoid direct losses of 0.1 acres of riparian habitat and 0.1 acres of wetlands in the access road,
- c. reduce the "High" potential for salts to enter streams, riparian areas and wetlands to "Low" potential, and
- d. eliminate impacts to 16 threatened, endangered or sensitive plant species.

### **Mitigation/Monitoring**

The draft EIS addresses a number of mitigation measures (including reclamation, mitigation and monitoring) to offset impacts to aquatic resources (referenced on page 143 and addressed on pages 52-98). These include direct and some indirect impacts to wetlands, seeps and springs, streams, and fisheries resources from the access road and hydrologic modifications associated with the infiltration gallery and mining operation, which we support. These would be strengthened with appropriate enforcement and monitoring mechanisms. A list of these is below.

- a. augmenting stream flows (p. 73 WQ-3) to offset impacts to wetlands and streams in the headwaters of Nicholson and Marias Creeks (there would still be reductions in base flows and lag time losses in average base flows for both Nicholson and Marias Creeks, with de-watering of seeps and springs and reductions in wetland hydrology. See pp.156-160).
- b. replacing culverts in Marias Creek (p. 76 WS-1) in a number of locations to facilitate fish passage and accommodate 100 year flood events.
- c. proposed compensatory mitigation (p. 146 & p. 76 WS-2) for wetland losses associated with the access road (provided by 'constructing small wetlands above culverts on live streams to compensate for wetlands lost from culvert replacement').
- d. livestock fencing.
- e. wildlife and fish mitigation and enhancement (p. 77 – 783).
- f. re-seeding and re-vegetation with native plant species (species lists or sources should be given to indicate clearly what will be re-seeded or re-planted).
- g. potential for chemicals to reach streams, wetlands, RHCAs and riparian habitat is low if spill occurs

The draft EIS addresses cumulative impacts to aquatic resources for each alternative so that consideration is given to collective impacts from the activities on Forest Service land and private lands associated with the overall Buckhorn mine. However, compensatory mitigation for the combined impacts is not fully addressed in the draft EIS. We recommend addressing this in the final EIS.

There appears to be no clear enforcement mechanism to ensure that all of the mitigation measures and monitoring proposed will be implemented. For example, it is not clear how often, in what location, who is responsible for, and how (what biological parameters and water quality parameters) monitoring will be performed and how monitoring would trigger contingency or adaptive management measures. These details should be clarified in the final EIS to ensure that impacts will be mitigated.

In our comments on the draft SEIS that we referenced in our earlier comments on the EA, we recommended that Table S-2 be amended to incorporate references to each permit or agreement and correspond those to the specific mitigation measure and enforcement so that these requirements are clearly identified. We recommend that the final EIS incorporate a table that lists each of the mitigation measures, including reclamation requirements and monitoring and show which permits or mechanisms will be used to enforce these measures. This table should include which permit or permits each element will be tied to (e.g., whether the requirement will be in the NPDES permit, the Washington Department of Natural Resources reclamation plan/permits, Water Rights permit(s), Hydraulic Project Approval (HPA), or Army Corps of Engineers Nationwide Permit, or the Forest Services approved Plan of Operations, etc.).

Ideally, there would be one aquatic resources mitigation plan that includes all of the details of a typical compensatory mitigation plan, includes goals and objectives, performance standards, a monitoring plan and schedule, contingencies and adaptive management decision making processes, performance bonds, and reporting schedules. The plan could include the suggested 'cross-walk' table identifying which permits and enforcement mechanisms the plan is tied to. We believe it would also be helpful if the final EIS would reference the Aquatic Resources Mitigation Plan being developed by the company and show how this will be implemented.

The draft EIS does not discuss whether or not impacts to Gold Bowl Creek will be mitigated for. Please discuss this in the final EIS.

### **Impacts to Aquatic Resources**

It is unclear what changes may occur to the aquatic environment from the location and operation of the infiltration basin. Please articulate these potential impacts in the final EIS.

Tables S-2 and II-7 provide a summary comparison of alternatives. The last line compares changes in base flow at individual stream stations. We recommend that this be followed by a line which summarizes the impacts to aquatic resources due to these changes in base flows.

The draft EIS predicts impacts in streams from salt treatment of roads to be less than 1 ppm chloride. This result is based on various chloride dilution estimates presented in the Environmental Consequences section. These estimates appear to be in error by up to five orders of magnitude. For example, the calculation that appears to be used in the draft EIS (p. 143) for estimating dilution spaced over one year for 7,960 gallons of magnesium chloride solution in a Marias Creek base flow of 110 gpm would result in about 30 ppm above a background of 3 ppm, not the 0.0001 ppm above background as indicated in the draft EIS. Similar errors of various orders of magnitude are apparent for the other chloride dilution calculations. Perhaps the actual calculations could be presented in an appendix for clarity. Moreover with regard to consistency with the state final SEIS, it should be noted that the magnesium chloride usage value in the draft EIS of 7,960 gallons per year contrasts with the usage value of 72,000 gallons per year in the Engineering Report referenced in the state final SEIS.

### **Performance Security**

The draft EIS rates the performance security as a highly effective mitigation measure. However, no estimate of the performance security is provided. Without such an estimate compared to projected reclamation and post-closure treatment and monitoring costs, there is no basis for stating that the performance security will be effective. We understand that final security will be established during permitting; however, a list of actions that would be included in the security and estimated range of costs can and should be made at this stage to support the statements made in the draft EIS.

STATE REPRESENTATIVE  
7TH DISTRICT  
JOEL KRETZ

State of  
Washington  
House of  
Representatives



CAPITOL BUDGET  
ECONOMICAL DEVELOPMENT,  
AGRICULTURE & TRADE  
NATURAL RESOURCES,  
ECOLOGY & PARKS

October 10, 2006

Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
1240 Second Avenue South  
Okanogan, WA 98840

Dear Mr. Boynton:

I represent District 7, Position No. 2 in the House of Representatives and the areas in which both the Buckhorn Mountain Project and the Kettle River Operations are located. I am writing as an elected official to stress the importance of the Buckhorn Mountain Project to this economically challenged region of Washington. On a more personal note, I live very close to the mine and the designated haul route. It is critically important that the U.S. Forest Service/ Okanogan and Wenatchee National Forests issue the final Environmental Impact Statement (EIS) and approve Alternative B for the Buckhorn Mountain Project as soon as possible.

It is very clear from the recently issued Preliminary EIS that the Buckhorn Mountain Project will directly benefit Ferry and Okanogan Counties, and will indirectly benefit the rest of the State of Washington. This environmentally responsible project should be approved immediately so the workers recently laid off from the Kettle River Operations can go back to work and the new jobs associated with the Buckhorn Mountain mine in Okanogan County can become a reality.

My constituents have waited for well over a decade for this mining project to bring a measure of economic growth and prosperity to the region. Frankly, we are out of patience and see no reason why we should wait any longer.

In considering the Final EIS, it is hard to imagine that anything more could be said about the roads, utility corridor, fencing, and infiltration area that will be on public lands. The 474-page Preliminary EIS examines these facilities in great detail. Consequently, the Forest Service has properly taken into account all relevant factors and has examined all aspects of the proposed project. It is also evident that the proposed project will have minimal environmental impacts both on and off of National Forest System lands. Given the thoroughness of the Preliminary EIS, I would hope the Final EIS can be issued promptly.

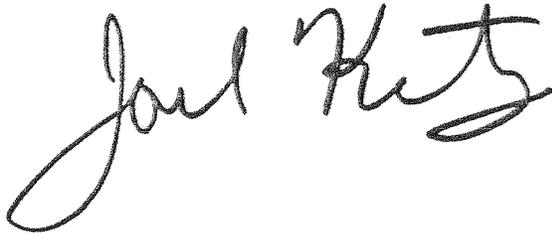
The U.S. Forest Service should understand that there is a great deal of public support for the Buckhorn Mountain Project. Area residents recognize the need for this project and the benefits it will bring to Ferry and Okanogan counties. There is widespread awareness that the revised project proposal represents a significant opportunity to develop a mine with the least possible

October 10, 2006  
Mr. James L. Boynton, Forest Supervisor  
c/o Ms. Jan Flatten  
Okanogan and Wenatchee National Forests  
Page 2

impact upon the environment. It also represents the best opportunity to maintain and create high-paying jobs, which are sorely needed in this economically depressed part of Washington State.

On a personal note, I live in close proximity to the project and designated haul routes and see nothing but positive contributions being made in our local neighborhoods. Once again, I strongly urge the U.S. Forest Service/ Okanogan and Wenatchee National Forests to issue the Final EIS and approve Alternative B for the Buckhorn Mountain Project as soon as possible.

Sincerely,

A handwritten signature in black ink that reads "Joel Kretz". The signature is written in a cursive, flowing style with a large initial "J" and a prominent "K".

Joel Kretz  
State Representative  
7<sup>th</sup> Legislative District