



STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE

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January 22, 2002

Tom Niemann, Principal Planner
Snohomish County Department of Planning and Development Services
3000 Rockefeller Avenue, M/S 604
Everett, WA 98201-4046

Dear Mr. Niemann:

The Washington Department of Fish and Wildlife would like to thank Snohomish County for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for Proposed Snohomish County GMA Mineral Lands Designation. The purpose of these comments is to assist in providing sound protection for fish and wildlife in keeping with the Washington's Growth Management Act.

Two of the four alternatives proposed incorporate a review of the compatibility of mining activities with the environmental features of surrounding lands. Alternative 2 focuses on reviewing environmental concerns, and Alternative 3 considers both environmental concerns and the compatibility of mining with neighboring land uses. Alternative 1 considers only the neighboring land uses, and Alternative 4 is the no-action alternative.

The consultant review and evaluation of these alternatives (Huckell/Weinmann Associates, November 19, 2001) unfortunately recommends Alternative 1. Under this alternative, the designation of mineral lands would be based on compatibility with surrounding land uses. Environmental review would occur only after the land has been designated and a mining project is then proposed. The primary concern with Alternative 2 seemed to be its effectiveness at reflecting environmental concerns in its ranking process. The concern with Alternative 3 seems to be the mixing of environmental and land use concerns into a formula that does not adequately reflect concerns about either factor.

WDFW feels that environmental review of sites should certainly be done at the planning stage, as Alternatives 2 and 3 envision. Without consideration of environmental factors at this early stage, the status quo will remain in place. If Alternatives 2 and 3 are flawed, the appropriate response is to correct the flaws and to design better review procedures that adequately and effectively account for environmental concerns. If the "mixing" in Alternative 3 is a concern, perhaps the review procedure should evaluate environmental and land use concerns separately, and a "passing grade" in both should be reached before mineral land use designation is approved.

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Considering the significant impacts that mining can have on the environment, it is very important to ensure that environmental review is done as early in the planning process as possible. If environmental review only occurs in the late stages, significant impacts are likely to occur that could have been avoided.

Thank you again for the opportunity to review and comment. If you have any questions, please feel free to call me at 425-379-2308.

Sincerely,



Mark Goldsmith

Habitat Biologist (Priority Habitats and Species/Growth Management)

cc: Deborah Cornett, Washington Department of Fish and Wildlife
Millard Deusen, Washington Department of Fish and Wildlife
Peter Riley, Washington Office of Community Development