

Blue Mountains Forest Plan Revision

Comment on Alternative 3 Recommended Wilderness

I am concerned that Alternative 3 now includes recommended wilderness acreage without clearly demonstrating that the mineral-resource potential of those specific lands was adequately evaluated before their inclusion. Early in the public comment process, the public was reassured that the wilderness proposal had been eliminated from the Forest Plan. At the final public meeting, however, recommended wilderness had reappeared in Alternative 3. This late change raises a significant question about whether there was sufficient time to update or complete the mineral-resource analysis for the lands newly placed into the wilderness alternative.

Earlier in the planning process, the public was also told that mineral resources would be considered in evaluating potential wilderness. This is particularly important in the geologically complex Baker terrane, where the absence of a currently producing mine or known economic deposit does not establish an absence of potential for undiscovered mineral resources, including minerals now considered critical to the United States. A meaningful analysis should consider favorable geology, known mineralization, historic workings and claims, geochemical and geophysical information, and the potential for undiscovered locatable and critical-mineral resources—not merely current production.

Before carrying these lands forward as recommended wilderness, I request that the Forest Service identify when the acreage was added to Alternative 3; what mineral-resource assessment was performed on those specific lands; when that assessment was completed or updated; and whether it evaluated current critical-mineral and undiscovered mineral potential. Please also identify the USGS, DOGAMI, geochemical, geophysical, or other geological information used in reaching that determination.

Most importantly, please establish in the administrative record whether the mineral-resource evaluation was completed or updated before or after these lands were selected for recommended wilderness in Alternative 3. The sequence matters because the public had previously been told that the wilderness proposal had been eliminated. If the recommended wilderness acreage was subsequently restored without sufficient time for an adequate and current mineral-potential assessment, I request that the Forest Service complete and disclose that analysis before carrying the recommendation into the Final EIS or Record of Decision.