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First name: John

Last name: Beasley

Organization: Metaline Contact Mines

Title:

Comments: Attached please find the formal Comments of Metaline Contact Mines ("MCM") to the 2016 Draft Colville National Forest Proposed Revised Land and Management Plan ("2016 Plan"), and Draft Environmental Statement ("DEIS").

Section I of our attached Comments has been prepared with the expert assistance of our consultants, J.A. Morton, a Professional Geologist, and Jasper Geographies. Section II has been prepared by our Director, Ed Pommerening, a professional Forester. These individuals and entities have vast knowledge and experience with regard to the subject matter and impacted area.

MCM has had a substantial stake in the Metaline Mining District for the past 88 years, so we have studied your proposals carefully. We acknowledge your time and effort in preparing said proposals, however, we feel the implementation of any of them would be a mistake.

Estimated Effects of Land Management Designations Presented In

2016 DRAFT Colville National Forest Proposed Revised Land and Resource Management Plan and DRAFT Environmental Impact Statement on Adjacent and Nearby MCM Property In the Metaline Mining District

SUMMARY

This review and comments are presented by Metaline Contact Mines (hereinafter "MCM") in response to the extremely large and complex text, figures, tables and maps of the various alternative proposals given in the 2016 FS Plan and DEIS. Section I is our attempt to predict how each of the FS proposed alternatives would affect mineral exploration, development and mining in northeastern Washington. Section II is a summary of our thoughts on the proposed FS wilderness designation on the area surrounding the towns of Metaline and Metaline Falls in northeastern Washington.

MCM is a Washington corporation that has been involved in the exploration and development of domestic mineral resources in the Metaline district since 1928. MCM holds the mineral rights to over 8100 acres in the Metaline mining district, giving It a significant vested Interest In the future of the district. MCM mineral rights include those on private land and mining claims on federal land administered by the Forest Service or the Bureau of Land Management, In order to simplify Its comments here, MCM has subdivided its mineral holdings into groups of contiguous parcels, labeled "A" through "O".

This review and estimation Indicate that many MCM parcels, particularly those immediately adjacent to FS management areas may be significantly affected by some of the proposed alternatives, but the complexity of the proposals and the near Impossibility of predicting how they would be administered on the ground make It almost impossible to determine what those effects will be. Some alternatives, however, would likely hinder or prevent road construction and drilling on a portion of the unpatented claims of Group E. More serious consequences would likely befall Group H, in an area that dozens of drill holes suggest may be underlain by ore. In that area, the FS has proposed alternatives that would expand the Salmo-Priest Wilderness and/or non-motorized Backcountry around the Halliday Fen RNA, greatly hindering or making impossible, the drilling and road building

necessary to develop orebodies.

In addition, some of the proposed alternatives will likely result in the removal of much of the area west of the Metaline district from the realm of exploration, development and mining in perpetuity, with little or no regard for the underlying geology and mineral potential.

SECTION I

INTRODUCTION

MCM is a Washington corporation that has been involved in the exploration and development of domestic mineral resources in Metaline district since 1928.

In the Metaline mining district (Figure 1) and in other areas of the region underlain by the Metaline Formation (Figure 2), Zn-Pb mining and the requisite exploration and development that precede it, have been a significant part of the economy for more than a century. But unlike the other substantial natural resource industry in the regional economy (the timber industry) new ore deposits can't be grown, they must be discovered. Some of the alternatives proposed by the FS would likely render the exploration, discovery, development and mining of new ore deposits much more difficult and costly than they are at present. In some instances they would preclude them altogether and neither would be in the best interests of area's residents.

The 2016 DRAFT Colville National Forest Proposed Revised Land and Resource Management Plan (herein, "the Plan") and DRAFT Environmental Impact Statement (herein, "the DEIS") is an extremely large and complex compilation of documents, figures, tables and maps describing various Forest Service management proposals. The length, style of organization and complexity make it difficult to read, understand and envision the consequences of the many alternatives. But that task is made even harder by factors such as:

1. The large number of proposed alternative management areas and the placement of their complex boundaries without apparent regard for topography, drainages, section subdivisions, adjacent properties, roads, etc.
2. The use of map colors that are so similar as to make it very difficult to determine the management status of adjacent parcels, particularly in very small map areas.
3. The overprinting in some areas by text, map symbols, or the quarter mile swath of gray surrounding FS roads on some alternatives, such that the underlying management categories are obscured.

4. The management area designations in the DEIS differ from those in the Plan for no apparent reason

The geology of the area is also considered briefly below to show why geology should be taken into account before much of the area is effectively rendered off-limits to mineral exploration and mining.

In responding to the Plan and DEIS, MCM had hoped to present something much simpler and straightforward, but the complexity of the subject and its consequences make that nearly impossible and this lengthy document is the result.

MCM mineral holdings in the Metaline mining district

MCM owns the mineral rights to more than 8,000 acres of property in the Metaline mining district (Figures 3 and 4), the surface rights of which are owned by other private parties. The effects of the various FS proposal on these properties are considered here by groups of parcels of contiguous land listed alphabetically, "A" through "O" from north to south (Figure 5). The groups were chosen because the individual parcels are contiguous and predominantly of one category or the other - private land or mining claims on public land (federally owned and managed by the FS or the BLM). Many of MCM's private parcels began as mining claims that were subsequently patented (title was transferred from the US to the mining claimant when ore was developed in accordance with

the Mining Law of 1872). The

current status of each group is given below, followed by the estimated changes in its status that would occur under each of the management alternatives proposed in the Plan and the DEIS.

ABBREVIATIONS AND SHORTENED FORMS

The abbreviations and shortened forms used here include the metals Fe (iron), Ge (germanium), Pb (lead), Ag (silver) and Zn (zinc) and corporate designations, AZ (American Zinc and Lead Smelting Co.), BH (The Bunker Hill Mining & Smelting Co.), BLM (U.S. Bureau of Land Management), CS (City of Seattle, Dept. of Lighting), Day (Day Mines Inc.), FS (U.S. Forest Service), GRCX (Gulf Resources and Chemical Exploration Co.), Gulnet (Gulnet Management, Inc.), Hecla (Hecla Mining Co.), MCM (Metaline Contact Mines), Pintlar (Pintlar Corp., successor in the Metaline district to The Bunker Hill Co. and POMM), POMM (Pend Oreille Mines and Metals Co.), Ramrod (Ramrod Consolidated Gold Co.), RFI (Resource Finance Inc.), TWI (Teck Washington Inc.), Vanguard (Vanguard Resources Inc.), and WR (Washington Resources Inc.).

GEOLOGY AND MINERALIZATION OF THE METALINE FORMATION - AN ABBREVIATED SUMMARY

Throughout much of the last century, Zn-Pb deposits in the Metaline Formation have been mined in Pend Oreille and Stevens counties, Washington and in adjacent British Columbia. The deposits are hosted by carbonate sedimentary rocks and are variants of a type of crudely stratiform ores (mineralization roughly parallel to bedding in the enclosing rocks) known as Mississippi Valley-type deposits, which have been mined at numerous locations around the world. Considerable progress has been made over the last 50 years in understanding the geology of this type of deposit, including those in Pend Oreille and Stevens counties.

Stratigraphy of the Metaline Formation. The Metaline Formation was deposited in the Cambrian-Ordovician geologic age and consists largely of the carbonate rock dolostone with lesser limestone and dolostone breccia (angular fragments of one lithology in a matrix of another lithology). In many other localities, sedimentary formations resemble a layer cake with individual beds extending laterally for great distances. Commonly, such beds can be age-dated by fossils and horizons of a particular age can be identified among them.

The Metaline Formation, however, is distinctly different from such well-layered sedimentary rocks because fossils are rare and bedding planes, even where they can be discerned, can't be traced laterally for large distances (Figure 6). For example, in some localities the Metaline may be as much as 6000 ft thick, but only one or two laterally extensive stratigraphic planes can be identified. Because of this, some geologists subdivide the formation into lithofacies, rather than stratigraphic units. The lithofacies are lithologically distinct units that may grade laterally and vertically into, or interfinger with, adjacent lithofacies and their boundaries may cut across hypothetical time planes (horizons). Even the contact between uppermost Metaline carbonates and the overlying black argillites of the Ledbetter Formation is known to be locally interfingered and to differ significantly in age from one locality to another.

Mineralization and ore. At least 2 distinct forms of Zn-Pb mineralization have been mined in the upper half of the Metaline formation (Figure 7). Josephine mineralization occurs from the top of the Metaline Formation to at least 500 ft below and comprises Zn- and Pb-sulfides with a relatively low Ag content, accompanied by pervasive silica and calcite. The deposits are generally crudely stratiform, but locally can be sharply discordant (they cut across local bedding) and appear to have formed well after their host sediments were lithified. In plan, groups of Josephine orebodies have a blob-like, amoeboid appearance. Within this irregular outline, however, some orebodies have a clear N-E-SW orientation. The mining grade of Josephine deposits is fairly low, because sulfide mineralization is erratic and poddy. Josephine orebodies were mined at the Josephine, Pend Oreille, Grandview and Metaline mines as well as at numerous other smaller mines throughout the district. Ores were concentrated in local mills and shipped to smelters in Kellogg, Idaho; Trail, BC and as far away as Montana,

Kansas and Missouri.

Yellowhead mineralization consists predominantly of Fe-pyrite with subordinate Zn- and Pb sulfides that also carry little recoverable Ag. Its Zn-sulfides, however, carry a significant amount of the rare metal germanium (recovered from TWI's Zn-Pb smelter in Trail, 50 miles to the north).

Mineralization is much more stratiform overall than Josephine mineralization, but on a small scale, the sulfides are also sharply discordant and appear to have formed after lithification of their host sediments.

Mining grade is much higher than Josephine ores because sulfide mineralization is much more concentrated and continuous. Yellowhead orebodies have a pronounced NE-SW orientation and occur along linear trends. In at least one location, drilling indicates that ore occurs in as many as 5 separate zones in a near-vertical, NE-SW oriented plane extending from as little as 800 ft below the Ledbetter/Metaline contact to as much as 2,400 feet below it. This strong linear component suggests an element of NE-SW structural control in the emplacement of Yellowhead ore (and possibly Josephine ore as well), perhaps reflecting basin margin faulting during and after the deposition of Metaline and Ledbetter sediments. The West Side Yellowhead mine and drill-indicated West Riverside ore intercepts occur along one such ore trend while the Washington Rock and Pend Oreille Yellowhead orebodies occur along another parallel ore trend. Yellowhead mineralization was mined originally from the West Side Yellowhead mine across the river from the Pend Oreille mine and is currently being mined in the deeper portions of the Pend Oreille mine itself. To date, mining has occurred in the uppermost Yellowhead zone in the Pend Oreille mine (Figure 7) and in zones of uncertain depth below the Ledbetter contact at the West Side Yellowhead mine and at smaller mines such as the Sterling, Lucky Strike and Riverside mines. Yellowhead deposits were also a major source of ore in Stevens County from the Calhoun, Deep Creek and Vanstone mines.

Faulting. Faults are abundant in the Metaline district where, in combination with vague stratigraphy, they complicate the geology and make mineral exploration even more difficult (Figure 2). NE-SW oriented, high angle normal faults with displacements on the order of a thousand feet are common. Thrust faults, generally recognized where older rocks have been pushed (thrust) over younger rocks or where highly deformed rocks overlie gently dipping strata, have been mapped in the district since early in its history (Figure 7). At the surface, the low angle of thrust faults and the difficulty in recognizing offset along them, make them more difficult to identify than normal faults. However, in the deeply incised canyon of the Pend Oreille River, thrust faults and related overturned beds have been mapped and it now appears they are more extensive than previously thought. Thrusts are further obscured in the district by offset along the numerous younger, high angle, normal faults and by the widespread, but erratic distribution of glacial sediments. The direction of movement and amount of displacement along the thrust faults is uncertain (Figure 7).

Historically, the Metaline district has been considered to be bounded on the west by the Flume Creek fault, thought to have displaced Cambrian-Ordovician Metaline and Ledbetter formations, east side-down, to the same level as the much older Precambrian and Cambrian rocks of the Abercrombie Hooknose block to the west. This interpretation requires vertical displacement along the Flume Creek fault on the order of 12,000 ft (more than 2 miles) that ends abruptly near the Canadian border. A more realistic interpretation that takes into account the thrust faulting recognized in the Metaline district may be that the older Abercrombie-Hooknose rocks were thrust over younger rocks, including the Metaline Formation, and that this older-above-younger assemblage was then cut by the west-side-down normal fault with displacement on the same order of magnitude as many of the other normal faults in the district (Figure 2). A logical extension of this interpretation is that the Abercrombie-Hooknose block may be underlain at depth by the Metaline Formation and the Zn-Pb ores it is known to host in the Metaline district to the east, in mining districts of Stevens County to the west and in British Columbia to the north.

Mining claims on public land. The current system allows individuals and corporations to file mining claims on most federal land. If development work proves up a viable orebody, the claimant can obtain title to the claims by the patent process and mining can be conducted under federal and state regulations. Under this process, the mining claimant makes a profit, the mine provides employment and income for local residents, tax revenue to governments and materials useful to society - in this case, zinc metal. It may be an imperfect and complicated system, but it has worked well enough for almost a century and a half.

Most federal land is and has been managed along the lines of "multiple use", but much of it has been assigned

management designations such as non-motorized Backcountry, Wood Forage, Caribou Habitat, Scenic/Winter Range, etc., that emphasize certain uses over others. Land classified as Wilderness-Recommended is put on a track to becoming Wilderness-Designated, after it is designated as such by Congress.

On congressionally designated Wilderness, only mining claims located on or before December 31, 1983 can be patented (if a valid discovery can be proven) and then only the mineral estate becomes the property of the claimant - surface rights are retained by the federal government. A mining claim located after December 31, 1983, but before congressional Wilderness designation could not be patented. Claims staked on land that is already designated by Congress as Wilderness are Invalid from the beginning.

At any time, on any unpatented mining claim, the federal government can conduct a validity Investigation to determine if a claim holder has made a valid discovery. If the federal minerals examiner determines that a valid discovery (one that can be developed and operated as a profitable mine) has been made, the claimant can patent the claim, thereby receiving title to the surface and minerals. If the examiner determines a valid discovery has not been made, the claims are declared null and void and the claimant loses all rights to the land. In some Instances, as In this case with the proposed expansion of the Salmo-Priest Wilderness and the recommendation for an Abercrombie-Hooknose Wilderness area, the federal government may decide It Is in the public interest for particular pieces of federal land to be used for purposes other than mining and withdraw the land from further staking of mining claims ("mineral entry"). Claims that already exist on such land may be allowed under "valid existing rights".

However, the government can ask such a mining claimant to prove they have made a valid discovery and if they cannot, the claims can be declared invalid and any and all rights the claimant may have had withdrawn.

References

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ESTIMATED EFFECTS ON GROUPS OF MCM PARCELS

Below, MCM land is segregated into groups of contiguous parcels, labeled "A" through "O" (Figure 5). Their current status with respect to FS management and access is described as well as their status under the variety of proposed alternatives given in the 2016 Plan and DEIS and the effects of those alternatives.

In "Appendix E: Suitable Uses by Management Area" (p.163) of the Plan, the FS classifies various uses with the phrases "May Authorize" and "May Not Authorize", For use categories that effect mineral exploration and mining, such as "Infrastructure, above ground . . .", "Minerals, locatable", "Road Construction, temporary" and "Utility corridors", these vague terms make any attempt to estimate the consequences of the proposed management

designations even more difficult. To further complicate matters, both "May" and "May Not" are used on some of the same management areas.

A - Private land in sections 3 and 4. T40N, R43E

Current Status. The group is bounded on the north by the Canadian border; on the west by FS Wood Forage; on the south by Scenic Timber; and on the east by other private land. Access is via an existing USFS road that diverges to the north from the Boundary Dam-Frisco Standard road (Figure 8).

Alternative P-Preferred. All of adjoining FS land would become Focused Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. Most adjoining FS land would become Restoration. FS land along the southern border would become Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. Most adjoining FS land to the west would become Restoration and along the southern border would become Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. All of adjoining FS land would become General Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. All adjoining FS land would become Active Restoration B. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property. The status of the FS roads on the land directly to the south could change, but it is unlikely the FS could close these and thereby deny access to this isolated parcel.

B - Private land and Bugle-Tuxedo claim group in sections 3, 9 and 10. T40N, R43E

Current Status. The status of some of the adjacent land is uncertain. Much of the adjoining FS land is classified as Scenic Timber and a small portion to the south is Scenic Winter Range. Some portions of the claim group and the private land border the Pend Oreille River. The Boundary Dam-Frisco Standard road passes through the property and runs along its eastern border (Figure 8).

Alternative P-Preferred. Portions of the group would become surrounded by Focused Restoration. Very near the western border of the private land a large patch of ground would become Backcountry. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. Some portions of the parcels would become surrounded by Active Management and Responsible Management Areas. Very near the western border of the private land, a large patch of ground would become Backcountry. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. Much of the group would become surrounded by Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. Almost all of the group would be surrounded by General Restoration land, the complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. Almost all of the group would become surrounded by Active Restoration B land. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

C- Private land and BJ and Giant claim groups in sections 15, 16, 21, 22 and 27, T40N, R43E

Current Status. The extreme north border of this group is adjacent to FS Scenic Winter Range and Scenic Timber; the western portion borders Interspersed private, FS Scenic Winter Range, Semi Primitive, Non-Motorized Recreation and Scenic Timber land; the southwestern portions border Scenic Timber, Scenic Winter Range and private land; and the eastern portions border interspersed Scenic Winter Range, Winter Range, Old Growth Dependent Species Habitat and private land. Boundary Dam road runs through the middle of the property and FS roads also traverse the property.

On all of the FS maps except Alternative O and No-Action, a very thin strip is shown just west of the western boundaries of sections 16 and 21 that separates FS management areas. Since the western boundary of section 16 is also the western border of a portion of the MCM private land, this leaves a very thin strip of FS land with a management designation that differs from FS land immediately to its west. There is no apparent reason for this strip and it is possible that it is a printing error - it may have been intended to place the line separating management areas on the western boundaries of sections 16 and 24 (Figure 8).

Alternative P-Preferred. FS land adjoining the property on the north would become Focused Restoration and on the west, a thin strip of Backcountry would separate MCM private land from Wilderness-Recommended. Some of the FS land to the west would also become General Restoration. Adjoining FS land to the east would change to Focused Restoration. FS land under the BJ claims would become General Restoration and under the Giant group, Focused Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. Much of the FS land surrounding property would become Restoration and Active Management and Responsible Management Areas and a small adjacent portion to the extreme west would become Backcountry. FS land under the BJ claims would become Restoration and under the Giant group, Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. Almost all of the adjacent USFS land would become Active Management and Responsible Management Area. To the extreme west, the area that would become Wilderness Recommended separated from the MCM private land by an extremely thin strip of General Restoration. FS land under the BJ and Giant claims would become Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. All of the adjacent FS land would become General Restoration land including a very thin strip on the extreme west that would separate MCM private land from FS land that would become Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. Much of the adjacent USFS land would become Active Restoration B land, including a very thin strip on the extreme west that would become non-motorized Backcountry separating MCM private land from FS land that would become Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

D - Ax and Ex claim group in sections 22, 23, 26, 27, 34 and 35, T40N, R43E

Current Status. The claims are held jointly by MCM and TWI. To the north the claim block is bordered by private land; to the west, by private land, FS Old Growth Dependent Species Habitat, and Scenic Winter Range; to the south by private and BLM land; and to the east by BLM land, the Pend Oreille River and Recreation land (Figure 8).

Alternative P-Preferred. Most of the FS land would be changed to Focused Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O, Most of the FS land on the western portion of the claims would change to Restoration land with small portions of Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B, Most of the FS land on the western portion of the claims would change to Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. Most of the land on the western portion of the claims would change to General Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make It impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. Most of the land on the western portion of the claims would change to Active Restoration B land. The complexity of the proposal and the uncertainty as to how it would be administered make it Impossible to predict the effect it would have on the property.

E · Rho claim group in sections 28, 33 and 34, T40N,R43E

Current Status. The claims are held jointly by MCM and TWI and are situated on FS land designated as Scenic Timber, Scenic/Winter Range, and Winter Range. Several USFS roads cross the property (Figure 8).

Alternative P-Preferred. Almost all of the land occupied by the Rho group would convert to General Restoration. A small portion along the western border would change to Backcountry. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. FS land on which the northern portions of the claims are located would become Restoration land, while the southern portion would become a combination of Restoration, non motorized Backcountry, and Active Management and Responsible Management Area. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. FS land on which the northern portions of the claims are located would become Active Management and Responsible Management Area, while the southern portion would become Restoration land. The complexity of the proposal and the uncertainty as to how it would be administered make it Impossible to predict the effect it would have on the property.

Alternative R. FS land on which the claims are located would become General Restoration land.

The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect t would have on the property.

DEIS Proposed Alternative. Most FS land on which the claims are located would become Active Restoration C land. A small portion of the claims in section 33 would become non-motorized Backcountry. A Backcountry designation could hinder or prevent such mineral activities as temporary road construction and drilling.

F - Private land in section 33 and 34. T40N.R43E

Current Status. This group of parcels of private land Is bordered on the north, south and east by private land and is contiguous on the west with the Rho claims on FS land designated Scenic/Winter Range and Winter Range. It Is bordered on the southeast by MCM/TWI claims on BLM land. Boundary Dam road runs through the middle of the property, which is also traversed by private roads (Figure 8).

Alternative P-Preferred. The FS land under the adjacent Rho claims would become General Restoration. The complexity of the proposal and the uncertainty as to how It would be administered make It Impossible to predict the effect it would have on the property (Figure 9).

Alternative O. The FS land under the adjacent Rho claims would become Restoration and Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. The FS land under the adjacent Rho claims would become Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it Impossible to predict the effect it would

have on the property.

Alternative R. The FS land under the adjacent Rho claims would become General Restoration.

The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. The FS land under the adjacent Rho claims would become Active Restoration C I and. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

G - Bee claim group in section 35, T40N, R43E

Current Status. The claims on BLM land are held jointly by MCM and TWI. They are bordered on the north by BLM land and on the west by the adjoining MCM private land. To the south, the border BLM land and on the east, the Pend Oreille River. The property appears to be accessible via roads on FS and BLM roads. Numerous core holes were drilled by POMM in the 1970s, several of which intersected Yellowhead mineralization of ore grade-thickness (Figure 8).

Alternative P-Preferred. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

H - Molly-Patsy claim group in sections 35 and 36, T40N, R43E and adjacent sections 31, T40N, R44E and section 1, T39N, R43E

Current Status. The Molly and Patsy claim groups are located on USFS Scenic Winter Range and Old Growth Species Dependent Habitat and partially extend into the adjacent Halliday Fen RNA, which was established after the claims were located, so the RNA is "subject to valid existing rights" held by MCM. The claims are surrounded on all sides by Scenic/Winter Range except where the RNA boundary overlaps them. Mineral entry {{locating mining claims}} was withdrawn on the RNA, but no effort has yet been made to invalidate those portions of the overlapped Molly and Patsy claims. State Hwy 31 and the Scenic Byways associated with it run through the claims as do a USFS road and the PUD overhead powerlines and the access road on which the lines are situated. TWI claims overlap some of claim group and there is some question as to seniority (Figure 8). The western branch of the claims lies above the projected ore trend of Yellowhead ore bodies drilled and mined at the far northeast end of the Pend Oreille mine. In addition, many of the more than two dozen surface holes drilled in the immediate vicinity over the past 60 years by AI, POMM, RFI, TWJ, Guinet, USBM and CS encountered significant intercepts of both Yellowhead and Josephine mineralization.

Alternative P-Preferred. The RNA would remain as it is, probably including the MCM claims with "valid existing rights". Much of the surrounding land, including much of the claim group would be changed to Wilderness-Recommended and Scenic Byways. This would likely make permits for road construction, drilling and underground mining extremely difficult or impossible to obtain {{Figure 9}}.

Alternative O. The RNA would remain as it is, probably including the MCM claims with "valid existing rights". Much of the surrounding land, including much of the claim group would be changed to Wilderness-Recommended and Scenic Byways. This would likely make permits for road construction, drilling and underground mining extremely difficult or impossible to obtain (Figure 10).

Alternative B. The RNA would remain as it is, probably including the MCM claims with "Valid existing rights". Much of the surrounding land, including much of the claim group would be changed to Wilderness-Recommended and Scenic Byways, This would likely make permits for road construction, drilling and

underground mining extremely difficult or impossible to obtain.

Alternative R. The RNA would remain as it is, probably including the claims with "valid existing rights". Much of the surrounding land, including much of the claim group would be changed to Wilderness-Recommended and Scenic Byways and "valid existing rights" would likely hold for the existing claims. This would likely make permits for drilling and road building and plans of operation almost impossible to obtain,

DEIS Proposed Alternative. Most or all of the RNA would become Wilderness-Recommended, possibly including the claims with "valid existing rights". Much of the surrounding land, including much of the claim group would be changed to Wilderness-Recommended, non-motorized Backcountry and Scenic Byways and "valid existing rights" would likely hold for existing claims. This would likely make permits for drilling and road building and plans of operation almost impossible to obtain.

I- Private land in section 3, 9 and 10, T39N. R43E

Current Status. This group of private parcels is bounded by private land except on the southeast where it is adjacent to the Pend Oreille River and on a small portion of the western border where it is adjacent to Winter Range. Much of the property is traversed by Boundary Dam road and by private roads (Figure 8).

Alternative P-Preferred. FS land adjacent to the small portion of the western border would become General Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. FS land adjacent to the small portion of the western border would become Active Management and Responsible Management Area. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. FS land adjacent to the small portion of the western border would become Active Management and Responsible Management Area. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. FS land adjacent to the small portion of the western border would become General Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. FS land adjacent to the small portion of the western border would become Active Restoration C. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

J - Private land in section 9, T39N, R43E

Current Status. This parcel is bounded on three sides by private property and the west is adjacent to FS land designated Semi-Primitive Non-Motorized Recreation and Scenic Timber. Boundary Dam road traverses the length of the parcel (Figure B).

Alternative P-Preferred. Adjacent FS land on the west would change to Backcountry and General Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. Adjacent FS land on the west would change to Backcountry and Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. Adjacent FS land on the west would change to Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. Adjacent FS land on the west would change to General Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. Adjacent FS land on the west would change to Backcountry and Active Restoration C. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

K - Private land in sections 2, 11 and 12. T39N. R43E

Current Status. This private parcel is bordered on the north by private land; on the west by FS Scenic/Winter Range and a small strip of Recreation land; on the south by private land; and on the east by Scenic Timber and Scenic/Winter Range. State Hwy. 31 runs through the length of the property.

Portions of the Yellowhead orebody in the Pend Oreille mine may underlie the northwestern tip of this parcel (Figure 8).

Alternative P - Preferred. The bordering FS land on the east would be consolidated entirely into Wilderness-Recommended and the land to the north would become Scenic Byways. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. The bordering FS land on the east would be consolidated entirely into Wilderness-Recommended and the land to the north would become Scenic Byways. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. The bordering FS land on the east would be consolidated entirely into Wilderness-Recommended and the land to the north would become Scenic Byways. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. The bordering FS land on the east would be consolidated entirely into Wilderness-Recommended and the land to the north would become Scenic Byways. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. FS property bordering the northern half of the parcel would become Scenic Byways and the portion bordering on the southeast would become non-motorized Backcountry. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

L - Private land in section 21, T39N. R43E

Current Status. This private parcel of patented mining claims sits atop Washington Rock where dozens of POMM and TWI drill holes have intercepted ore grade-thicknesses of mineralization in several Yellowhead zones in the Washington Rock-East Side Yellowhead ore trend. The property is surrounded by private land. Drill access roads extend north from Boundary Dam throughout most of the parcel (Figure 8).

Alternative P-Preferred. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. The complexity of the proposal and the uncertainty as to how it would be

administered make it impossible to predict the effect it would have on the property.

M - Private land in section 20, T39N. R43E

Current Status. The private parcel is situated on the bench above the town of Metaliene. It is surrounded on three sides by private land and is bordered on the west FS land classified Wood Forage. The parcel is readily accessible via the high voltage powerline road and other roads across private land (Figure 8).

Alternative P-Preferred. The upper portion of the FS land to the west would become Wilderness-Recommended, the portion below that would remain General Restoration and the lowest portion would become Focused Restoration. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. The upper portion of the FS land to the west would become Backcountry, small portions adjacent to that would become Restoration as well as Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. A tiny upper portion of the USFS land to the west would become Wilderness Recommended, small portions to the south of that would become Restoration as well as Active Management and Responsible Management Areas. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. A tiny upper portion of the USFS land to the west would become Wilderness Recommended, just south of that a tiny piece would become General Restoration and the portion south of that would become Old Growth Dependent Species Habitat/Late Forest Structures land. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. A tiny upper portion of the FS land to the west would become non motorized Backcountry, the portion below that would become Active Restoration C and the lower portion would become Active Restoration B. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

N " Private land and the Annex and Round Top-Eight Spot claim groups in sections 29, 30, 31 and 32, T39N, R43E, sections 1 and 2, T38N. R42E and sections 5, 6 and 7, T38N, R43E

Current Status. This large and complex piece is bordered on the north by a small patch of FS land designated Scenic Timber, to the north and west by Semi-Primitive, Non-Motorized Recreation land and to the south, southeast, east and northeast by private land and the Pend Oreille River. A portion of the southwest border is adjacent to Wood /Forage land. Road access is via Highway 31, the FS road along the high voltage powerlines and the FS Lost Lake road (Figure 8).

Alternative P-Preferred. The small portion of adjacent land adjacent to section 6 on the west would become Focused Restoration and the small portion to the far north would be divided between General Restoration and Focused Restoration. Almost all of the land to the northwest would become Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. The small portion of adjacent land adjacent to section 6 on the west would become Restoration and the small portion to the far north would be divided between Restoration and Active Management and Responsible Management Areas. Almost all of the land to the northwest would remain non-motorized Backcountry. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. The small portion of land at the far north would become Restoration, as would the small portion

adjacent to section 6. The small portion of adjacent FS land in the northwest corner of section 31 would become Active Management and Responsible Management Areas. The remainder of adjacent FS land to the north and west would become Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. The small portion of adjacent FS land at the far north would become Old Growth Dependent Species Habitat/Late Forest Structure as would the small portion adjacent to section 6.

Almost all of the land to the northwest would become Wilderness-Recommended, except for a small isolated piece in section 31 that would become Back Country, non-motorized. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. The small portion of adjacent FS land at the far north would become Active Restoration B and non-motorized Backcountry. The small portion adjacent to section 6 on the west would become Active Restoration B. Almost all of the remaining land to the north and west would become Wilderness-Recommended, except for a small isolated piece in section 31 that would become non-motorized Back Country. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

O - Private land in section 1. T38N. R42E

Current Status. This parcel is bordered on the north and south by FS Wood/Forage, on the west by Scenic Timber and on the east by private land. Access to and through the parcel is via the powerline and Lost Lake roads (Figure 8).

Alternative P-Preferred. FS land to the north and south would become Focused Restoration and on the west, Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 9).

Alternative O. FS land to the north and south would become Restoration and non-motorized Backcountry on the west. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property (Figure 10).

Alternative B. FS land to the north would become Restoration, to Wilderness-Recommended on the west and Active Management and Responsible Management Areas on the south. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

Alternative R. FS land to the north and south would become Old Growth Dependent Species Habitat/Late Forest Structures and to the west, Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

DEIS Proposed Alternative. FS land to the north and south would become Active Restoration B and to the west, Wilderness-Recommended. The complexity of the proposal and the uncertainty as to how it would be administered make it impossible to predict the effect it would have on the property.

SECTION II

The following is a summary of my thoughts on the proposed Wilderness Designation on the area surrounding the Metaline and Metaline Falls towns in NE Washington. Metaline is on the West side of the Pend Oreille River while Metaline Falls is on the East side of the River approximately ten miles South of the Canadian border along the river at the base of ridges on both sides of the River. The ridges and peaks are minimum of 2500 feet above these towns and only 4 miles to the West of Metaline with a one mile wide bench, meaning a very steep slope to the summit of the ridge.

Wilderness areas by definition from the 1964 resolution is defined as an area of a minimum of 5000 acres of no man disturbed sites located within the area. This means no roads or trails for homesteading, exploration or transportation to the peaks. The area will be left unmanaged by man and not to have trees cut for management,

disease, Insect problems or for fire suppression.

A road system is located on each side of the river on top of river system and in some instances closer than a quarter mile from the proposed boundary. One is the State highway going into Canada, and the other is a main road way going to Boundary Dam and a famous State Park on the Canadian border just Inside the U.S. Both road systems have both industrial, Major Dam and electrical transmission lines, and a Major mine and concentrator site, along with numerous family settlements within feet of the proposed border. There are also lawful Patented and Unpatented mineral claims both within the boundary and bordering the boundary. Surface exploration work will need to be done especially on the unpatented claims which will interfere with the border of the proposed wilderness along with a transportation system which a drill will require that may interfere with the proposed border. As previous stated there are numerous residents along the proposed border and private land that enters the proposed area with road systems required for entering the private properties. Also the area has numerous cattle farms that are mostly open range that will require the entering and exiting of this area for the rounding up of cows that leave their designated areas. All of this activity has been going on for many years, some for a Century (100 years), -and the government just cannot come in and stop it as some of the activities are protected by law because of duration of use or requirements of proving mineral. One of the most upsetting part of this proposed Wilderness Area, is the fact of lack of management of the timber within the area. As stated above people live within feet of some of the border and or live down in the steep valleys as is the town of Metaline. With no management of the forest, and with the disease and insect problems a fire in these thick, unmanaged forests that have a high mortality will cause a very hot fire that can not only burn the trees but cause extreme heat in the valleys that can burn human lungs and even get hot enough to cause spontaneous combustion within the town site. This has happened numerous times with firefighters losing their lives not by the flames in most instances, but being trapped in a valley with the heat burning their organs.

If people would look at photos of areas that were taken five-ten years before a major forest fire occurred, In most of these areas they will notice grey and or red trees that are dead or dying. These unmanaged areas are the most dangerous areas to the forest and the components of the forest such as the native animals and man the lives adjacent to the area or within the area. One can look at a major burned area, then look at the history photos taken 5-10 years before and see this type of activity before the fire.

As a life-long forester another disturbing thought about this proposal is the fact that most fires are caused by some sort of man related activity. Here we have a border of a wilderness area along a main highway a series of high voltage power lines and family homes, in some instances feet a quarter mile from this unmanaged forest. Finally remember that a Fire within a Wilderness cannot be fought within its borders as fighting the fire is not natural or Mother Nature's way of control. It's always best to fight the fire as it starts before it gets large and threatens human settlements.