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Comments: November 5, 2018

VIA EMAIL TO: objections-chief@fs.fed.us AND FIRST CLASS MAIL

Objection Reviewing Officer USDA Forest Service

1400 Independence Ave SW EMC-LEAP, Mailstop 1104

Washington DC 20250

RE: Objection regarding the Revised Colville Forest Plan Dear Objection Reviewing Officer:

Teck Washington Incorporated (Teck) is writing to object to the Revised Colville National Forest Land Management Plan (hereinafter "Revised Plan"). Teck remains concerned that the Forest Service improperly and imprudently proposes to recommend areas of significant mineral resource and mining activity for designation as Wilderness, Research Natural Areas or Backcountry areas, and it proposes to manage those areas in a way that will interfere with mineral exploration and development.

The objector's name and address are as follows: Teck Washington Incorporated

Mark Brown, General Manager

Pend Oreille Operations

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Teck submitted comments on the Proposed Action for the Forest Plan Revision by letter dated September 19, 2011, and additional comments on the Draft Revised Plan and the associated Draft Programmatic Environmental Impact Statement by letter dated June 29, 2016. Both letters are attached and incorporated by reference. Teck's previous comments were detailed and well supported. They identified specific sections of land that should be managed differently than the Forest Service proposed. Unfortunately, the Forest Service appears to have ignored most of Teck's comments, speaking instead in the most general terms and failing to provide a legally sufficient justification for its proposed action.

Moreover, the Forest Service has not taken into account that during its multi-year process of developing the Revised Plan conditions on the ground have changed. Areas that may have once been appropriate for designation as Wilderness, Research Natural Areas or Backcountry have been explored for mineral development and staked as mining claims.

Teck sets forth objections below that are consistent with the comments it submitted previously. Teck also requests an in-person meeting to discuss and resolve its objections to the Revised Plan.

Teck's Operations in Pend Oreille County

Teck is a wholly-owned subsidiary of Teck Resources Ltd. It owns and operates the Pend Oreille Mine located two miles north of Metaline Falls, Washington. Teck resumed operations at the zinc mine in 2014. Operations are currently at a production rate of 30,000 tonnes of zinc metal contained in concentrate per year.

Teck also holds almost 19,000 acres of property in Pend Oreille County either as fee land, leased mineral rights or mining claims. Of these, approximately 8,800 acres are located on federal lands managed by the Bureau of Land Management or the United States Forest Service. These lands are highly mineralized and have tremendous potential to produce economic deposits of zinc and other minerals. Teck continues an active prospecting and exploration program in the area and has identified several significant zinc deposits on its lands that it intends to mine in the future.

In 2016, the Proposed Revised Plan and the Draft Environmental Impact Statement (Draft EIS) did not even acknowledge Teck's operations at the Pend Oreille Mine. The Final EIS now acknowledges the mine's operations, but it seems to incorrectly assume that operations will soon cease. Final EIS at 670.

The Forest Service fails to appreciate and acknowledge that Teck's mineral explorations have continued during the many years that the Service has been working on the Revised Plan. Teck has staked more than 200 mining claims since 2011. In fact, since 2016 when the Forest Service issued the Draft EIS, Teck has staked claims on almost 300 additional acres of Forest land, yet the Final EIS has not updated the mining claim information presented in 2016 draft. Compare Final EIS at 671 (stating that there are approximately 750 mining claims covering 14,980 acres) with Draft EIS at 546 (stating that there are 748 mining claims covering 14,980 acres). In particular, Teck has staked additional mining claims that render the designation of some areas as Wilderness or Research Natural Areas inappropriate.

Both Teck's operations and the mining industry in general are very important to Pend Oreille County and the communities adjacent to the Colville National Forest. The 268 jobs provided by Teck's Pend Oreille Mine constitute approximately nine percent of the jobs in the County. See <https://esd.wa.gov/labormarketinfo/countyp/rofiles/pend-oreille> (Pend Oreille County has just over 3000 jobs, and a civilian labor force of about 4750 people).

The Draft Record of Decision touts an estimated 830 timber, recreation and livestock related jobs the Forest Service claims will be supported by the Revised Plan, but it fails to acknowledge the threat the Revised Plan poses to mining jobs in the region. USFS, Draft Record of Decision for the Colville National Forest Revised Land Management Plan 9 (Sept. 2018) (hereinafter "Draft Record of Decision"). The

Forest Service should carefully consider the implications for this important sector of the economy before finalizing its Record of Decision.

Objections to the Revised Plan

For the past seven years, the Forest Service has been proposing revisions to the Colville Forest Plan, holding public meetings and accepting written comments. Unfortunately, the Forest Service has not considered and responded to Teck's comments in any meaningful way. The result is an arbitrary and capricious Revised Plan that is not consistent with the underlying statute. The Service's draft Record of Decision is not supported by the facts in the record.

Although the Forest Service has made minor changes to designated management areas in the Revised Plan, Teck continues to object to several specific areas designated as Recommended Wilderness, Research Natural Areas, and Backcountry.

1. Teck objects to the designation of mineral-rich areas near Metaline Falls as Recommended Wilderness. The Revised Plan designates a total of 61,630 acres of the Colville National Forest as Recommended Wilderness. See Draft Record of Decision at 8. The wilderness recommendations include three areas identified as Abercrombie-Hook.nose (29,330 acres), Bald Snow (17,400 acres) and Salmo-Priest Adjacent (14,900 acres). See id. If these recommendations were adopted, they would more than double the amount of Wilderness area in the Colville Forest, from its current 29,000 acres.

In 2011, Teck objected to the proposal to include mineral-rich areas in the Recommended Wilderness designations. In 2016, Teck identified the following specific sections of land east of Metaline Falls that the Forest Service proposed to recommend adding to the Salmo-Priest National Wilderness, and the following specific sections of land west of Metaline Falls that the Forest Service proposed to recommend adding to the Abercrombie-Hook.nose Wilderness Area:

Sections 1, 2, 11, 12, T38N, R42E

Sections 25, 36, T39N, R42E

Sections 1, 8, 12, 13, 14, 17, 20, T39N, R43E

Sections 28, 29, 32, 36, T40N, R43E

Sections 29, 30, 31, T40N, R44E

Teck's exploration activities have continued since 2016, and we have now identified the following additional sections with prospective mineralization:

Sections 19, 30, 31, T39N, R43E.

As shown in attached figures, Teck has mining claims that now cover these areas.

The Forest Service indicates that "[t]he recommended wilderness boundaries in the proposed revised forest plan have been modified to exclude some areas where existing mining claims are located. These adjustments have been made in recognition of northeastern Washington's high

mineral potential and the statutory rights of U.S. citizens to explore for and develop valuable minerals deposits." Final EIS at 1084-85. The Service does not explain, however, why all of the mineral rich areas with mining claims were not excluded.

Looking at the materials on the Forest Service website it is very difficult to even determine which sections of land are included in the Recommended Wilderness designations. The documentation speaks in very general terms and on-line GIS maps do not include layers showing property sections. It appears that the Forest Service may have adjusted some of the Recommended Wilderness designations in T39N, R43E, and in T40N, R43E, but it is difficult to determine.

Teck objects to the designation of any of the above-listed sections as Recommended Wilderness. There are mineral resources, exploration or development activity in or adjacent to these areas.

These areas do not meet the criteria for Wilderness designation, and the Forest Service has not provided any explanation for including these areas in its recommendations.

a. The Forest Service's decision to designate more Recommended Wilderness in the Colville National Forest is arbitrary and capricious.

The Revised Plan recommends adding 61,630 acres of Wilderness to the Colville National Forest without any justification. The Draft Record of Decision explains the decision to designate this additional Recommended Wilderness as follows:

These [Wilderness] areas are important to some members of the public for the opportunities they provide for a recreational experience with a sense of solitude and self[shy] rebance. These areas also provide unroaded blocks wildlife habitat with relatively little human disturbance.

Draft Record of Decision at 11-12. [t continues:

I believe that this approach for recommended and designated wilderness provides balance with managing for other desired conditions across the Colville NF. The Salmo-Priest Adjacent recommended wilderness area will improve the manageability of the boundaries of the Salmo-Priest Wilderness. This area also provides valuable habitat for wildlife species that benefit from quiet, unroaded environments, such as grizzly bear, caribou, and lynx. Providing the Abercrombie-Hook.nose and Bald Snow recommended wilderness areas will ensure that forest users who seek a wilderness-like experience can find that opportunity on both the east and west zones of the Forest.

Draft Record of Decision at 12.

This is the sum total of the rationale presented for the decision to recommend a more than doubling of the amount of Wilderness in the Colville Forest: wildlife habitat and recreational opportunities. The Forest Service's own documents undercut both bases.

The desire to provide wildlife habitat does not justify the recommendation to significantly increase the area of Wilderness. None of the areas designated as Recommended Wilderness are considered critical habitat for the species mentioned. Indeed, in 2011, the Forest Service

admitted that providing wildlife "refugia is not a driving factor" supporting the wilderness recommendations. USFS, Preliminary Administrative Wilderness Recommendation:

Information for Proposed Action 11 (June 30, 2011). In the same document, the Forest Service concluded that "none of the species needed wilderness in order to survive." Id. at 6.

Likewise, recreational needs do not justify the Wilderness recommendations. In 2011, the Forest Service did claim that "additional wilderness was recommended due to a need to increase the availability of that recreational

experience in the area." Id. at 3. However, that general claim was contradicted by the Forest Service's own data. There are already more than 29,000 acres of Wilderness in the Colville Forest, and very few people use it. In 2009, the Forest Service acknowledged that use of the current wilderness areas in the Colville Forest is "fairly light."¹ USFS, Wilderness Evaluation: Abercrombie -Hooknose 13 (May-June 2009). In 2011, the Forest Service acknowledged that although 362,000 recreational visitors came to the Colville National Forest in 2009, only 1000 visited the existing wilderness area. USFS, Proposed Action for Forest Plan Revision: Colville National Forest 45 (June 2011); see also Draft EIS at 660 (less than one percent of forest visits are to wilderness areas).

In the Draft Revised Plan, the Forest Service acknowledged that the Salmo-Priest Wilderness already provides "outstanding opportunities for solitude and isolation." Draft Revised Plan at

114. None of the forest users surveyed reported concerns of overcrowding in wilderness areas. Draft EIS at 660-661. Based on this data, the Forest Service stated "[t]hese findings suggest that current designated wilderness is adequate to satisfy recreational demand for wilderness." Id.

It is also important to keep in mind that the Colville Forest is not the only area available for recreation. There are an additional 1,470,000 acres of Wilderness available in the nearby Okanogan-Wenatchee National Forests. Preliminary Administrative Wilderness Recommendation at 5. Indeed, Washington State has thirty-one Wilderness Areas, covering a total of more than 4.4 million acres. See USFS, Forest Plan Revision of the Colville and Okanogan-Wenatchee National Forests: Briefing Wilderness Statistics.

The Final EIS vaguely refers to "the public's desire for additional wilderness" but does not include any reference supporting this claim. Final EIS at 714. The data summarized above does not support this claim of a public desire for more Wilderness. On the contrary, previous surveys suggest that there is a public desire for more managed recreation and recreational infrastructure designed for mountain biking, ATV riding and other non-Wilderness recreational activity. See Proposed Action for Forest Plan Revision at 12, 13. The suggestion that there is a need for, or even a widespread public desire for, additional Wilderness area for recreation is simply not true. Indeed, the County officials elected to represent the public in this area have objected to the Recommended Wilderness designations. Draft Record of Decision at 11, 18.

Moreover, even if there were a desire for some additional roadless recreational areas, the Forest Service has not justified make such large additional designations. The Revised Plan includes Recommended Wilderness areas that are larger than the entire current Wilderness designations in the Forest. In addition, it would create the Kettle Crest Recreation Area, that consists of more than 80,000 acres that will be managed in part as Backcountry. Draft Record of Decision at 11; Final EIS at 725; Revised Plan at 133.

The basis for the Recommended Wilderness designations presented in the Draft Record of Decision is contrary to the Forest Service's own data and previous conclusions. It is also worth noting that Pend Oreille County opposes these Recommended Wilderness designations. The Forest Service's claims that the Revised Plan "is the outcome of extensive collaboration" with county governments, and that the Forest Service has a "commitment to work with the counties." Draft Record of Decision at 6, 9. Yet at the end of the day, the Forest Service has designated Recommended Wilderness areas that the elected officials closest to those areas oppose. Id. at 11, 18.

b. The specific designations of Recommended Wilderness are arbitrary and capricious.

Teck objects more strongly to some of the specific designations of Recommended Wilderness than to the general idea of recommending more Wilderness. Even if more Wilderness were appropriate, the decision to designate the specific sections identified above is arbitrary and capricious.

In 2011, the Forest Service explained its reason for recommending designation of the Salmo-Priest Adjacent area east of Metaline Falls as follows:

Rationale: This area would add acres to the existing Salmo-Priest Wilderness, improving the overall wilderness setting, consolidating trails within wilderness, and improving boundary management. It is relatively important for fish, plant, and wildlife habitat and connectivity. It offers under-represented vegetation types and landforms. Trade-offs are few, but include mountain-biking and the range of tools available for vegetation manipulation. Most of the wildland urban interface and mining claims are excluded,

USFS, Preliminary Administrative Wilderness Recommendation at 16.

Similarly, in 2011, the Forest Service explained its reason for recommending designation of the Abercrombie-Hooknose area west of Metaline Falls as follows:

Rationale: This area provides a large wilderness-like setting, contributing a high quality primitive recreation experience with an existing trail system, which is a need on the Forest. It is relatively important for wildlife habitat and connectivity. Wilderness management is relatively helped by shape and size. It offers underrepresented vegetation types and landforms currently not widely found in the wilderness system. Trade-offs are few, but include mountain-biking which is not allowed in designated wilderness. Most of the wildland urban interface and mining claims are excluded. There is a cherry-stem with a private inholding that may affect management of wilderness.

Id. at 12.

These general paragraphs fall far short of the scientific findings required to support Wilderness designation, the rarest and most protective designation in the National Forest System. Moreover, they do not address the specific sections of land that are the focus of Teck's objections.

The area around Metaline Falls is an area rich in minerals. In 2001, the Forest Service acknowledged that there were "many active mining claims" on the periphery of these areas.

Preliminary Administrative Wilderness Recommendation at 12, 16. The Bureau of Land Management has identified the area as having "high locatable mineral potential." Figure 2 is a BLM map showing the bureau's assessment of mineral potential in north eastern Washington counties, including Pend Oreille County. Numerous acres of land, mining rights and claims are owned or leased by Teck and other mining companies in this area. See Figure 3. These areas near Metaline Falls do not satisfy the criteria for wilderness designation and designating them as wilderness would be contrary to federal public land management policy.

The Forest Service has interpreted the statute to require Wilderness to satisfy three tests: "capability, availability and need." Forest Service Handbook 1909.12, section 72 (2005). These tests are site specific. The Forest Service may only recommend a particular area for Wilderness designation if the area satisfies all three tests. The specific sections of land identified above do not.

First, these areas fail the capability test because they are not untouched by human activity. According to the National Wilderness Preservation System statute, wilderness is "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." 23 U.S.C. [sect] 113 l(c). To be designated as Wilderness, an area must have wilderness characteristics. This means it must be free of human disturbance or development, have natural integrity, provide solitude and offer special features, such as areas with unique geological, scenic or cultural significance. See Forest Service Handbook 1909.12, section 72.1. An area of historic and on-going mineral exploration and mining activity lacks the pristine natural character and solitude necessary to be considered capable of being Wilderness.

The Metaline Mining District has a long history of commercial mining. Mining activity in the area dates back to the mid-nineteenth century. Teck's objection focuses on the areas near the existing Pend Oreille Mine -- see specific sections identified above. Teck affiliates hold approximately 18,800 acres in Pend Oreille County as fee land, leased mineral rights or mining claims. A map showing Teck's mineral interests is attached as Figure 1. As shown in Figures 4(a), (b), and (c) many of Teck's mining claims are found on Forest Service lands that are included in the proposed wilderness recommendations.

Second, the specific properties identified by Teck fail the availability test for Wilderness

designation. To determine whether a particular area is available for Wilderness designation, the Forest Service must evaluate "how wilderness designation would be beneficial or detrimental to various resource values." USFS, Northeastern Washington Forest Plan Revision: Wilderness Recommendation Process 2 (2011). Although designating a particular area as Wilderness might protect certain recreational opportunities, the area should not be considered available if the area has other important values, such as a significant mineral potential. For this reason, the Forest Service Handbook indicates that highly mineralized areas should not generally be considered

available for Wilderness designation. Forest Service Handbook 1909 .12, section 72.21.

Teck's Pend Oreille zinc mine lies near the center of the Kootenay Arc, a geologic feature extending from British Columbia to Northeast Washington and characterized by numerous base metal deposits. Our geologists also believe that similar deposits exist in the adjacent public property. Indeed, we have staked numerous claims in these areas. A Wilderness designation, however, would likely preclude any further investigation of the mineral potential.

The Forest Service has previously acknowledged the mineral resources and mining activities

areas that it now recommends for Wilderness designation. The 2011 Wilderness

Recommendation Information document acknowledged that there are numerous mining claims in the Salmo-Priest Adjacent area and that one mining plan has been filed. Preliminary Administrative Wilderness Recommendation at 16. The Forest Service has also acknowledged that the proposed wilderness areas in the Abercrombie Hooknose areas included "several important areas ...with moderate to high potential" for locatable minerals, Wilderness Evaluation:Abercrombie-Hooknose 12 (May-June 2009), and "[m]any active mineral claims on the periphery." Preliminary Administrative Wilderness Recommendation at 12.

However, in 2011, the Service stated that "[m]ining claims along PWA boundaries are excluded, including one with a filed plan of operations." Id. at 10. This statement is incorrect. As shown in Figures 4(a), (b), and (c) the Recommended Wilderness designations include many areas with active mining claims. These areas should be considered "unavailable" for Wilderness designation under the Forest Service's standards. Moreover, if the Service intended to exclude active mining claims, it should exclude the areas identified above.

Third, the specific properties at issue fail the needtest for Wilderness designation. To be designated as Wilderness, a site-specific analysis must demonstrate that an area is needed to provide additional wilderness values. As discussed above, the Forest Service has not demonstrated that more Wilderness is needed at all. However, our objection here is more specific. The Forest Service has not demonstrated a need to designate the particular areas we

have identified above. In revising other forest plans, the Forest Service has focused on whether a particular area is needed to provide specialized habitat for plants or animals, or to protect unique scientific values. See USFS, Northeastern Washington Forest Plan Revision: Wilderness Recommendation Process at 3. Here, Teck objects to the Recommended Wilderness designation of a specific list of properties -- see page 3 above -- and the Forest Service has not provided any explanation suggesting there is a need to designate these areas as Wilderness.

c. The Recommended Wilderness designations are contrary to law.

Even if the specific properties at issue met all three of the required tests- capability, availability and need - Teck would still object to their designation as Recommended Wilderness because this designation would interfere with

significant mining activities and, therefore, is contrary to law.

Congress has long declared as a matter of policy that the Federal Government shall "foster and encourage ... the orderly and economic development of mineral resources." 30 U.S.C. [sect] 21a.

Public lands are to be "managed in a manner which recognizes the Nation's need for domestic sources of minerals." 43 U.S.C. [sect] 1701(12). Forest Service policy reflects these statutory commands through the concept of "multiple use." When it comes to planning, Forest Service regulations provide that the "first priority for planning to guide management of the National Forest System is ... to provide for a wide variety of uses, values, products and services. 36 C.F.R.

[sect]219.2(a). The Recommended Wilderness designations are directly contrary to these statutory and regulatory commands.

As the Forest Service acknowledges, its regulations require that land management plans "provide for multiple-use and sustained yield of goods and services from the National Forest System in a way that maximizes long-term net public benefits in an environmentally sound manner." Draft Record of Decision at 13 (quoting the 1982 Planning Rule 219.1). The specific wilderness

designations to which Teck objects do not provide a net public benefit. On the contrary, the public would lose the benefit of mineral exploration and development and get no corresponding gain. Significantly, Teck is not objecting to all Recommended Wilderness designations. Rather it has carefully tailored its objection to specifically identified mineralized sections, with known mineral potential and existing mining claims.

3. The Forest Plan should not manage recommended areas as if they were designated Wilderness. Teck objects to the Forest Service's decision to manage Recommended Wilderness areas as if they were already designated as Wilderness by Congress. Only Congress can designate wilderness areas. If Congress does so, those areas must be preserved and protected as required by federal statute. The Forest Service may not circumvent this statutory process by imposing Wilderness-like restrictions in those areas before Congress acts.

The Revised Plan would immediately restrict activities in areas recommended for wilderness designation. "Wilderness characteristics are protected until Congress either designates the area as part of the National Wilderness Preservation System or the area is released from consideration." Revised Plan at 149; see also Final EIS at 59. This likely means restricting access and other changes that will make further mining activity infeasible or impractical.

4. The Forest Service should not identify mineral rich areas near Metaline Falls as Research Natural Areas.

The Forest Service has explained that Research Natural Areas as follows:

Research Natural Areas (RNA), whether established or proposed, are a part of a national network of ecological areas designated in perpetuity for research and education and/or to maintain biological diversity on National Forest System lands. They are established to provide study and protection of a full range of habitat types and remain in a relatively unaltered condition for non-manipulative research observation, and study.

Proposed Action of Forest Plan Revision at 61.

The Revised Plan indicates that all mineral uses, road construction and surface occupancy would be prohibited in these areas. Revised Plan at 117. Management of these areas a de facto Wilderness would prevent the development of existing Teck mining claims in the Halliday Fen Research Natural Area. Teck objects to the designation and use restrictions. Research Natural Areas are intended to be areas that remain in a "relatively unaltered condition." Revised Plan at

117. It is not appropriate to designate areas of active mining claims as Research Natural Areas

because these areas are already altered by human activities.

5. The Forest Service should not include mineral rich areas near Metaline Falls in the Backcountry Management areas.

The Revised Plan has included mineral rich areas amongst those identified for management as Backcountry Management Areas. Although the Plan provides that some mineral-related activity could be authorized in backcountry, the Plan would prohibit temporary or permanent road construction, which would make mineral exploration and development activity infeasible.

Teck objects to the designation of the eastern half of Section 9, T40N, R43E, and all of sections 28 and 33, T40N, R43E as Backcountry. These areas have existing mining claims and private mineral rights that would require roads for development.

6. The Final EIS fails to present a reasonably thorough discussion of the Revised Forest Plan's environmental impacts.

Under the National Environmental Policy Act (NEPA), a federal agency is required to prepare an Environmental Impact Statement or EIS in connection with any action that would significantly affect the environment. An EIS is intended to provide agency decision makers and the public with information about the environmental impacts of the proposed action. In order to do so effectively, an EIS must contain a reasonably thorough discussion of the significant aspects of the probable environmental consequences." *City of Carmel-by-the-Sea v. U.S. Dept. of Transp.*, 123 F.3d 1142, 1150 (9th Cir. 1997). The agency must take a "hard look" at the action's effects, and the EIS must provide a "full and fair discussion of significant environmental impacts." *National Parks & Conservation Ass'n v. Bureau of Land Mgt.*, 606 F.3d 1058, 1072 (9th Cir.

2009). In evaluating the thoroughness of an EIS, courts consider whether the EIS has fostered informed decision making and informed public participation. *California v. Block*, 690 F.2d 753, 761 (9th Cir. 1982).

Here, the Final EIS provides no meaningful discussion of the issues of concern raised by Teck. The Final EIS states that "the boundaries of the Sallno-Priest Adjacent and Abercrombie[shy] Hooknose Recommended Wilderness areas were modified, to the extent practicable, to exclude some areas where existing mining claims are known to exist." Final EIS at 1088. This does not explain why the Forest Service did not exclude all existing mining claims, or why it would not be "practicable" to exclude the areas identified by Teck.

The Final EIS also states that although adjustments were made to exclude some areas of mining claims, "the proposed revised forest plan still encompass existing mining claims that are located deeper within the recommended wilderness area boundaries." Final EIS at 1112. This statement is misleading. Most of the areas of mining claims identified by Teck are found along the boundaries of the Recommended Wilderness designations, not deep within the designated areas. See Figures 4(a) and 4(b). There is no reason these areas should not have been excluded as well.

The Final EIS fails to include a reasonably thorough discussion of the impact of Recommended Wilderness designations on mining activities in the area. The Final EIS does not mention that there are mineral resources and mining activity in the areas designated as Recommended Wilderness. It does not explain how the limitations on temporary and permanent road construction would effectively prevent most mineral exploration and development in these areas. In fact, these designations would severely restrict, if not completely eliminate the ability to utilize these mineral resources.

7. Teck objects to a Forest Service decision that appears to be based on information that has not been made available for public review.

The Forest Service has failed to explain its decision and to present to the public the information that it claims provided the basis of its decision on Recommended Wilderness.

The Draft Record of Decision states as follows :

To ensure I met my legal and regulatory responsibilities during the land management plan revision process for evaluating areas that exhibit wilderness values, I directed the

IDT to again look for areas that met the criteria of recommended wilderness areas prior to the release of the final EIS. Through ground verification, the team found limited areas in the Abercrombie-Hooknose recommended wilderness that did indeed have evidence of past timber harvest. The team also addressed concerns from the mining industry regarding access to claims that led to refinement of the boundaries of the Abercrombie[shy]

Hooknose and Salmo-Priest Adjacent recommended wilderness.

Draft Record of Decision at 15.

This amounts to little more than an unsupported claim that "we did what we were supposed to do." Neither the Service's original look at the specific areas designated as Recommended Wilderness, nor the Service's claimed second look are documented in any detail. Why were the specific areas Teck identified in its 2016 comment letter originally included in the designations, and why do most of them remain in the designations despite the supposed second look? The public cannot understand or meaningfully participate in the Forest Plan revision process if the Forest Service never explains its proposals or decisions and fails to present any documentation of its alleged analysis.

Prior to finalizing the Record of Decision, Teck requests a meeting with the Forest Service. We ask the Forest Service to review the specific sections listed above for a determination of their Wilderness characteristics and be prepared to explain why they should be included in a designation of Wilderness or Backcountry. We also request a review of the boundaries of the proposed Research Natural Area and consider excluding the areas covered by mining claims.

We would like to discuss these specific objections with the Forest Service . Respectfully,

/s/ Mark Brown

General Manager, Pend Oreille Mine