



Nevada Mineral Exploration Coalition

The Voice of Nevada Exploration

Carson City RMP
Bureau of Land Management
Carson City District Office
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Via e-mail

To all concerned:

The Nevada Mineral Exploration Coalition (NMEC, or, the Coalition) respectfully submits the following comments with regard to the Carson City District Draft Resource Management Plan and Environmental Impact Statement. (CCD-RMP).

The Nevada Mineral Exploration Coalition is an IRS-recognized 501(c)(6) grass roots organization consisting of those who make their living directly or indirectly by exploring for mineral deposits in the state of Nevada. The latest figures (2011) provided by the Nevada Bureau of Mines and Geology show that there were in excess of 200 private and public companies engaged in mineral exploration activities in Nevada with expenditures directly into the Nevada economy in excess of \$600,000,000.

We will comment on the following categories: (a) Inadequate notification to interested parties regarding the land use planning; (b) Lands with Wilderness Characteristics; (c) Travel and Transportation Management; (d) Locatable Minerals; (e) Mineral Potential Assessment

A. Notification

The BLM is required by Section 2 of H1601-1 NEPA Land Use Planning Handbook to notify all interested parties of its intent to revise land use plans. The BLM did not provide adequate notice. Mineral claimants are undeniably interested parties. Owners of patented inholdings are equally interested parties. Given that the draft RMP proposes a land use plan with the potential to significantly restrict mineral exploration on public land, more than a short posting in the Federal Register and local newspapers is required to ensure fair notification to all land users. We point out that the BLM has the addresses of all claimants, so sending a direct notice to each one is feasible. As part of the scoping process, the scoping team mailed postcards “in February 2012 to over 630 agency officials, organizations, and members of the public” (pg. 1-8). Claimants of record should have received those same postcards.

B. Lands with Wilderness Characteristics

1. Incomplete inventory

This draft Resource Management Plan contains a proposed management category that was not present in previous versions of the plan: Land with Wilderness Characteristics (LWC), managed to maintain those wilderness characteristics. During the preparation of this draft RMP, the wilderness characteristics of these areas were inventoried on a parcel-by-parcel basis, but none of the other characteristics were inventoried. Of greatest concern to us, mineral resources and mineral potential were not inventoried. (The *Mineral Potential Assessment Report* is a review but it is not an inventory). The BLM cannot make an informed decision regarding the best management of resources if it does not have a current inventory of all the various resources: wilderness, mineral, and other. Before making any decision regarding management of these candidate LWC areas, BLM must inventory all resources on those areas to the same level of detail as they have the wilderness resources. The Coalition and its members would be pleased to provide citizen input on mineral resources and mineral potential, akin to input submitted by other citizen groups regarding wilderness resources. Of course Coalition input could only inform, not replace, BLM inventory.

2. Roadlessness as a Wilderness Characteristic

The draft RMP states “The inventory process entails the identification of wilderness inventory units, an inventory of roads and wilderness characteristics, and a determination of whether or not the area meets the overall criteria for wilderness character” (pg. 3-129). Size is the first criterion for wilderness characteristics and it is defined as: “an area must be a roadless area larger than 5000 acres of contiguous BLM administered land ...”. The Resource Management Plan does not define ‘road’, but *Manual 6310 Conducting Wilderness Characteristics Inventory on BLM Lands (Public)* does define ‘road’. Appendix C, Pg 1, footnote 3:

Road: An access route which has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

- a. Improved and maintained – Actions taken physically by people to keep the road open to vehicle traffic. “Improved” does not necessarily mean formal construction. “Maintained” does not necessarily mean annual maintenance.
- b. Mechanical means – Use of hand or power machinery or tools.
- c. Relatively regular and continuous use – Vehicular use that has occurred and will continue to occur on a relatively regular basis. Examples are: access roads for equipment to maintain a stock water tank or other established water sources, access roads to maintained recreation sites or facilities, or access roads to mining claims.

We assert that, using the above definition, none of the 12 candidates for LWC designation is roadless. There are only two candidate LWC areas for which the Route Analysis has been made public, Excelsior North and Chukar Ridge. The Route Analysis for both of them lists and provides photographs of numerous locations where a road has been constructed by blading. It may have been some time since the last blading, but the definition specifically states that maintenance does not necessarily have to be annual. We expect that examination of the Route Analyses for all the other candidate LWC areas, when provided by the BLM, will document similar constructed, improved, and maintained roads. The extensive experience of Coalition members in these areas is that all the candidate LWC areas have roads.

3. Self-reclamation

The document *Full_LWC.pdf* (downloaded from the Carson City District website) is a compilation of the Inventory Area Evaluations for numerous inventory areas that were evaluated for wilderness characteristics during the studies leading up to the draft RMP. Several evaluations use the concept of self-reclamation or natural reclamation. For two candidate LWC areas, Excelsior North and Chukar Ridge, BLM has released more detailed analysis and evaluation, which also incorporate the concept of natural reclamation. For example, “Throughout the range, old stumps can be found as testament to the wood cutting industry that fueled the surrounding mining activities. This early 20th century human activity is substantially unnoticeable as the intervening decades have produced a second growth forest that appears to be entirely natural” (*Excelsior No 1 WILDERNESS CHARACTERISTICS*, pg. 2). For another example, a charming and nearly roofless historic wooden cabin is the subject of Photo 7 of the wilderness characteristics photo log for Excelsior North (*NV_030-425_Appendix_D_2014_Photo_Log_.pdf* and *NV-030-425_Appendix_D_2014_Photos.pdf*, downloaded from the Carson City District website). For yet another example, historic mining structures are identified as a supplemental value for the Chukar Ridge candidate LWC: “This area has historical significance with mining and mineral resources. . . . Significant historical sites exist along the northern boundary including the Nevada Rand Mine, the Golden Pen Mine, and the Blue Sphinx Mine. Some large historical structures are still intact and remain standing to this day. In these locations, one can almost sense the presence of past humans, and feel the spirits in an echoing and ghostly fashion Much past development is re-naturalizing with no extra help.” (*Chukar_WILDERNESS_CHARACTERISTICS.pdf*, pg. 7-8)

The concept of self-reclamation or natural reclamation is of course a slippery slope and one can slide down it in any one of many different directions. It seems the authors are stating that old disturbance is good, but future disturbance would be bad. A flippant observation yet one that holds truth is that new disturbance will, with time, become old disturbance and become something for future hikers to enjoy in the same way they enjoy semi-collapsed wooden cabins today. Just be patient! Another point is that exploration and mining activities today do not require that kind of waiting for self-reclamation. Today, operators are required to reclaim all disturbances promptly and there is bonding in place to guarantee the reclamation.

4 Highest and Best Use

BLM’s own instruction manuals state that the existence of wilderness characteristics does not mean that wilderness is the highest and best use of an area. For example, *Manual 6320 Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process (Public)* states “Considering wilderness characteristics in the land use planning process may result in several outcomes, including, but not limited to: (1) emphasizing other multiple uses as a priority over protecting wilderness characteristics; (2) emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; (3) the protection of wilderness characteristics as a priority over other multiple uses.” (pg. 3)

Before choosing to manage the LWC to maintain wilderness characteristics (as in Alternatives C or E), the BLM must defend why those characteristics are a priority over other multiple uses. The draft RMP does not include such a defense.

The position of NMEC is that the long-term future economic and “jobs” health of the Carson City District, the state and the country require that public lands be managed to maintain open access and to embrace the concept of multiple use. In many cases the highest and best use of the land is the

development of the mineral resources contained therein. Managing lands having demonstrable mineral potential for their, at best, marginal wilderness qualities does not conform to multiple-use ideals.

C. Travel and Transportation Management

We believe that a universal limitation of motorized travel to existing routes is not in the best interests of the BLM or the general public. Many essential activities are carried out in these areas by governmental, academic and industry geologists, biologists, archeologists, surveyors etc. In many cases there are no roads or trails to areas they must access. This includes historic mining areas, land survey monuments, wildlife habitat, archeological sites and mining claims. These workers generally use low impact vehicles that have a limited, transitory effect on the land. In addition, firefighters need to travel overland to where they need to fight or prevent fires, in whatever vehicle can get them there. We do agree that some restrictions may be necessary in areas of very high usage where mitigation is clearly warranted.

D. Locatable Minerals

In the RMP, Row 333 & 334 of Table 2-2, illustrated by figures 2-26 and 2-28 states that Alternatives B, D, and E recommend withdrawal of a huge tract of land from locatable mineral entry, that tract being the Department of Defense coordination area to the east and west of Dixie Valley. Alternative C does not recommend withdrawal of that area. The rationale for withdrawal is public safety. BLM does not offer any evidence or documentation of a safety issue. Before pursuing that withdrawal BLM must document why the area is not safe for mineral exploration but it is safe for, say, solar development (Fig 2-86 to 2-89) or Extensive Recreation Management (Fig 2-58 to 2-61); and why there would be no safety issue if the land is managed to preserve and protect ecosystem health (Alternative C).

E. Mineral Potential Assessment

Geology and minerals in the planning area are discussed in at least three places: Section 3.3.3: Affected Environment / Resource Uses / Geology and Minerals (Locatable, Salable, and Leasable); Section 4.4.3: Environmental Consequences / Resource Uses / Geology and Minerals (Locatable, Salable, and Leasable); and the separate document *Mineral Potential Assessment Report (June 2013)* (MPAR). The descriptions of the geology and mineral resources are a reasonable start but are dated and incomplete.

For example, only one significant active precious metal mine is listed in the planning area, Rawhide Mine in Mineral County. However Nevada Bureau of Mines and Geology Special Publication 25, *Major Mines of Nevada 2013* lists two additional precious metal mines: Borealis Mine in Mineral County, and Comstock Mining's Lucerne Mine in Storey County. Even if the second two operations are not on BLM land per se, they are very much a factor in the mineral potential on adjacent BLM land and must be considered in the assessment.

A Plan of Operation for a significant active diatomite mine is also missing, Grefco Minerals in Mineral and Esmeralda counties

The listing of Plans of Operation (Table 3-29 in the RMP; Tables 3-3 to 3-13 in the MPAR) are informative but would be substantially more informative if they were displayed on a map, the way geothermal leases are. Similarly, the listing of historical mining districts (Table 3-1 in the MPAR) would be much more informative if presented as a map

The MPAR and RMP lack an analysis of the past and potential future economic impact of minerals production in the Carson City District. No informed management decisions can be made without such an analysis.

Summary comment

The multitude of various restrictive resource categories (WSA, LWC, ACEC, VRM, SRMA, ERMA, Scenic Area, Wild and Scenic River, etc. etc.) is confusing and totals vast areas, with the cumulative effect of closing off a great deal of public land. Public land is intended to be used, to work and to be enjoyed, not to languish fenced off like a museum.

Thank you for your consideration of these comments. We acknowledge that the Bureau of Land Management must balance vehemently competing interests and it is not an easy job. Thank you for the effort that has gone into the planning process.

Sincerely,



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CC: Governor Brian Sandoval
US Senator Harry Reid
US Senator Dean Heller
US Representative Mark Amodei
US Representative Crescent Hardy