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April 25, 2015

Carson City District  
Bureau of Land Management  
5665 Morgan Mill Rd  
Carson City, Nevada 89701

RE: Resource Management Plan – Draft

To whom it may concern:

The Women's Mining Coalition (WMC), a nation-wide grass roots group of women, respectfully submits the following comments addressing the draft Environmental Impact Statement and the accompanying documents and reports for the Carson City BLM District Draft Resource Management Plan.

The WMC was founded in 1993 with membership composed of women who work in all aspects of mining, mineral exploration, mining equipment manufacturing and support industries. The women fill all positions within these industries from equipment operators, to technicians/scientists, to management. We have many members dealing with regulatory and permitting tasks.

We see our industry as being part of our nation's future economic success, with exploration for, and development of our own natural resources, done in an environmentally sensitive manner.

Based on our members with the technical expertise in permitting, exploration and development we submit the following comments.

Sincerely,

WMC President 2015-2016

Specific Comments:

- 1- Notification of all interested parties: Section 2, H1601-1 NEPA requires notification of all interested parties when revising Resource Management Plans. Since claimants are interested parties, and claimants pay claim maintenance fees, posting in local newspapers and in the Federal Register is not enough to ensure that claimants learn of the proposed changes to land management. Some of these claimants have held claims for many decades, and have paid claim maintenance fees for more than 2 decades. Except for Alternative A all of the Alternatives change the management of some acreage hosting existing claims. There are mineral withdrawals proposed, essentially invalidating claims, and the “lands with wilderness characteristics” will change the management from multiple-use to managing as a WSA. Claimants have spent time and money on evaluating their mineral rights, as per statute, with the goal of developing a mineral deposit and the proposed changes to management of multiple-use lands makes development uncertain. The BLM has a database of all claimants and that database needs to be used to notify claim holders of the proposed changes to multiple-use.
- 2- The accompanying documents and maps for the draft RMP are seriously flawed leading to erroneous conclusions.

The maps for Alternatives A-E (Volume 4, Appendix A) do not include Nevada state highways 361, 839, 369 and 360, all of which are paved leading someone not familiar with the area to assume it is less accessible than it really is.

The Mineral Assessment Potential Report (June 2013) is also seriously flawed compiled by authors who do not have an understanding of the geology of Nevada, especially the Walker Lane structural belt, nor an understanding of the science of mineral deposits. The RMP is supposed to be “based on current scientific knowledge and the best available data”, but much of the data used in the report is from 3-4 decades ago, with no (no references from the last 5 years) recent scientific literature, such as epithermal systems, included in the report.

The report does not include operating mines/developing mines within the CCD, such as the Grefco diatomite mine; the report states that Denton-Rawhide is in closure when, through a POO approved by the CCD BLM, they are mining again with adjacent exploration underway; the report minimizes the Pumpkin Hollow copper project by stating there is some “interest” in copper development near Yerington when the CCD BLM permitted the initial POO which included building a shaft which is under construction.

Because the authors of the Mineral Assessment Potential Report don't understand Nevada geology or mineral deposits the conclusion that “BLM-administered lands within the planning area are known to contain several areas of moderate to high mineral resource potential” (Volume 1, Chapter 3, Pg 3-159) is erroneous. Just based on the number of active POOs and NOIs (61) the potential is greater than several, let alone the number of historic mining districts, all of which, prove there are numerous (not several) areas with moderate to high potential.

The lack of understanding mineral deposits is demonstrated by the statement on

statement on Pg 4-450; “Finally, operators may choose to relocate outside of the withdrawal area where there are fewer requirements” – exploring for minerals means claims will be located where the minerals exist, not locating claims where the “requirements” are easiest.

The CCD BLM should have the Mineral Assessment Report re-written by authors with experience in Nevada geology and the science of mineral deposits, then more appropriate conclusions can be made.

3- Report on Lands with Wilderness Characteristics (LWC):

This report was released in November 2014. The time frame from the posting of the report to the comment due date (including the extension) was not enough time for anyone to field check the proposed LWC units for mineral potential or for other multiple-uses. Each LWC deserves more than a few hours to a couple of days, which was the time frame given to assessing the wilderness characteristics, to evaluate all the categories of multiple-use during a season when access can be assured.

The CCD BLM should allow time for each LWC unit to be evaluated for all multiple-use, which would require a minimum of 10-14 field days for each unit.

4- The WMC has concerns with the proposed mineral withdrawals and other land use restrictions in areas with both Bi-State and Greater Sage-Grouse habitat. There should be no mineral withdrawals on the basis of sage-grouse habitat. The CCD RMP should adopt the 2014 Nevada Greater Sage-grouse Conservation Plan developed by the Nevada Sagebrush Ecosystem Council as the sage-grouse conservation measures on BLM-administered lands in the District.

Alternatives:

The WMC looks forward to the CCD recognizing the deficiencies in both the accompanying documents and the draft RMP which have led to proposals with too much acreage which limits multiple-use. Since all of the Alternatives include withdrawals for Locatable Minerals, except Alternative A, the WMC supports Alternative A. Alternative C is not at all acceptable with too many acres being withdrawn from mineral entry, and too many acres subject to a change in management. The BLM preferred Alternative E also takes too many acres out of mineral entry, plus too many acres placed into a restrictive category for mineral exploration and development.