

## **Comments on BLM Carson City District Office Draft RMP**

**By: Gaylord Cleveland**

6059 Torrington Drive, Reno, NV 89511 775-276-0335

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Hand Delivered to BLM, CCD RMP, 5665 Morgan Mill Road, Carson City, NV 89701

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I attended the public meeting on the BLM/CCDO Draft RMP at the Carson Valley Inn in Minden, NV, on January 22, 2015, and the public hearing in Fallon on March 19, 2015. I reviewed many of the documents on BLM's website although it is so big that I could not possibly read the entire set of documents. I am a consulting geologist. My comments fall into five categories—(a) Lands with Wilderness Characteristics, (b) locatable minerals, (c) travel and transportation, (d) wild horses, and (e) general comments on the process and findings.

### **A. Lands with Wilderness Characteristics (LWC)**

#### **1. General**

- a. In the 1968-1970 wilderness studies, the existing WSA's were all deemed unsuitable for designation as Wilderness Areas (and of course should have been reopened to public entry by Congress long ago). Inexplicably, even more areas are now proposed as LWC's (12 in Alt. C and 8 in BLM-preferred Alt. E). BLM has apparently largely just accepted an environmental group's late (Dec. 2013) submission and findings for the evaluations of so-called "roadless" areas with minimal objective evaluation.
- b. It is very important to note that BLM Instruction Memorandum No. 2013-106 dated April 15, 2013, says, "While members of the public, including individual citizens, non-governmental organizations, and cooperating agencies may collect and submit inventory information to the BLM for its consideration to help inform BLM's inventory process, (1) they may not be on BLM wilderness characteristics inventory teams, conduct the inventory for the BLM, or make any findings for the BLM regarding whether the lands in question do or do not have wilderness characteristics." The biased inventories for the currently proposed LWC's seem to have been conducted by Friends of Nevada Wilderness (FNW) and much of the evaluation seems to have been taken verbatim or summarized from FNW's documents, which is in violation of the Instruction Memorandum. I suggest that BLM go back and do its own independent thorough evaluation.
- c. The concept of an LWC seems to me to be dubious in the first place. It appears to stem from a Wilderness Policy memorandum from Secretary Ken Salazar dated June 1, 2011. He notes that on Dec. 22, 2010, he issued Secretarial Order 3310 to order use of the resource management planning process to designate certain lands as "Wild Lands". But he goes on to say that, "On April 14, 2011, Congress passed the Department of Defense and Full-Year Continuing Appropriations Act, 2011 ... which

- includes a provision (Section 1769) that prohibits the use of appropriated funds to implement, administer, or enforce Secretarial Order 3310 in Fiscal Year 2011.” He confirms that “the BLM will not designate any lands as ‘Wild Lands’”. But then he states that, “I am directing Deputy Secretary David Hayes to work with the BLM and interested parties to develop recommendations regarding management of BLM *lands with wilderness characteristics*.” (emphasis added). Since subsequent BLM Manuals 6310 and 6320 are nearly identical to draft Wild Lands implementation manuals 6300-1 and 6300-2, it appears that Secretary Salazar simply used semantics and deception to circumvent Congress and establish an LWC category, since the underlying policy did not change. I feel that this action was illegal and the entire process including the current BLM Manuals is subject to legal challenge.
- d. The proposed LWC’s are under consideration in part because “Changing land uses often reflected a decline in mineral exploration and assessment” (p. 3-132). I suggest that, if in fact real, such a decline is only temporary reflecting cyclical down periods in the minerals markets in the interim. Apparently the BLM did not check its own LR 2000 mining claim database and its database of NOI’s to assess the numbers of active claims, past inactive claims, permitted projects and past permitted projects on proposed LWC’s as a measure of mineral potential and minerals interest. (Current POO’s are discussed but in fact there may be current POO’s which are missing from your list.) You would find that there are active mining claims numbering in the hundreds or thousands on more than one of the proposed LWC’s (see also Chukar Ridge comment (c) below). It is essential that you check your own records (LR 2000, NOI, and POO) to evaluate the level of mineral interest and activity.
  - e. I could find no evaluation of the mineral potential of individual LWC’s other than the flawed overall CCD mineral potential report (see below). Although mineral potential apparently does not enter into your LWC evaluation criteria, it should be. It is most unfortunate that several of the proposed LWC’s are in areas with high hardrock mineral potential, specifically Chukar Ridge, Excelsior North, Excelsior South, and Rawe Peak-Lyon Peak (see below). I recommend that, at a minimum, all of these areas be left out of an LWC classification.
  - f. I question the supposed roadless nature of the proposed LWC’s (see below) as well as the general lack of other LWC qualifications such as “naturalness” and “primitive recreation”. The lack of such qualities precludes most of them from being considered. The significance of current human-caused disturbance is being significantly downplayed.
  - g. Even though the BLM does not necessarily have to manage an LWC as wilderness (“the BLM has discretion to determine which portions of BLM-administered lands with wilderness characteristics would be protected by special management”, p. 3-129), it will in fact be managed as wilderness (“While the BLM is in the land use planning process, the BLM will manage lands so as not to forgo management options”, p. 3-129). The simple fact of its designation as an LWC almost certainly

- biases future decisions such as actions by Congress towards a wilderness classification, whether or not it is warranted by facts on the ground.
- h. The BLM's plan for management of LWC's should be specified in this RMP document rather than being kicked down the road (i.e., controversy dodged). Note the following text, "A final determination as to the management of these areas will be issued through a separate ROD" p. 3-131, and "The final *Lands with Wilderness Characteristics Inventory Summary Report* is anticipated winter 2015", p. 3-131. I fear that delayed management decisions on LWC's may unfortunately be pushed into the category of "implementation decisions ... not subject to protest" as discussed on p. ES-5 and 6.
  - i. But the purported delayed management decision for LWC's is in fact contradicted by statements in the LWC section of Table 2-2 (p. 2-100), under (a) Objective: "Manage lands to protect wilderness characteristics to maintain a high degree of naturalness and offer outstanding opportunities for solitude ...", and (b) Action (for Alts. C and E): "Manage [416,500 or 332,600] acres to protect wilderness characteristics".
  - j. The Report on Lands with Wilderness Characteristics is not a report at all; it is essentially a joke. All it does is describe the evaluation process. The only results given in the report consist of a list of acreages identified in Table C; there is no discussion of individual LWC's. Data on individual LWC's is found only in a series of checklists in the giant Full\_LWC file. The Full\_LWC files have missing information, i.e. Appendices C and D, for each area evaluated, some of which appears to have been posted for selected LWC's after public requests. But these data are not complete for all LWC's.
  - k. The Mineral Potential Assessment Report is way out-of-date in terms of both the geologic description and more modern views of the mineral deposit models. Several significant past-producing mines and deposits on or immediately adjacent to the CCD are not shown on maps or are barely discussed, for example, the Santa Fe mine near Calvada Summit. Only currently operating mines are shown on Figure S-1. I suspect the bulk of the report was slightly modified from a 1960's vintage report. Nevertheless Figure 4.2 shows high probabilities of volcanic-hosted gold and silver deposits in many of the proposed LWC's including Chukar Ridge, the Excelsiors, and Rawe Peak-Lyon Peak. Please re-do this report with current input from the USGS, Nevada Bureau of Mines and Geology/ University of Nevada Reno, and the minerals industry. In addition, this report is designed only as a summary to evaluate the potential of the entire Carson City district, but does not substitute for detailed evaluations of individual LWC's.
  - l. The presence of Nevada Department of Wildlife (NDOW) "guzzlers" (water development features for wildlife separated into big game and small game types) is generally ignored in the evaluations. Photo 1 below is of a recently-constructed big game guzzler. Access to those guzzlers for maintenance is essential. Certainly

features beneficial to wildlife have just as much aesthetic value to citizens of the U.S. as closing off large areas to all but a few backpackers.



**Photo 1.** NDOW’s Mabel South big game guzzler located north of the Excelsior North LWC, constructed on March 8-9, 2014.

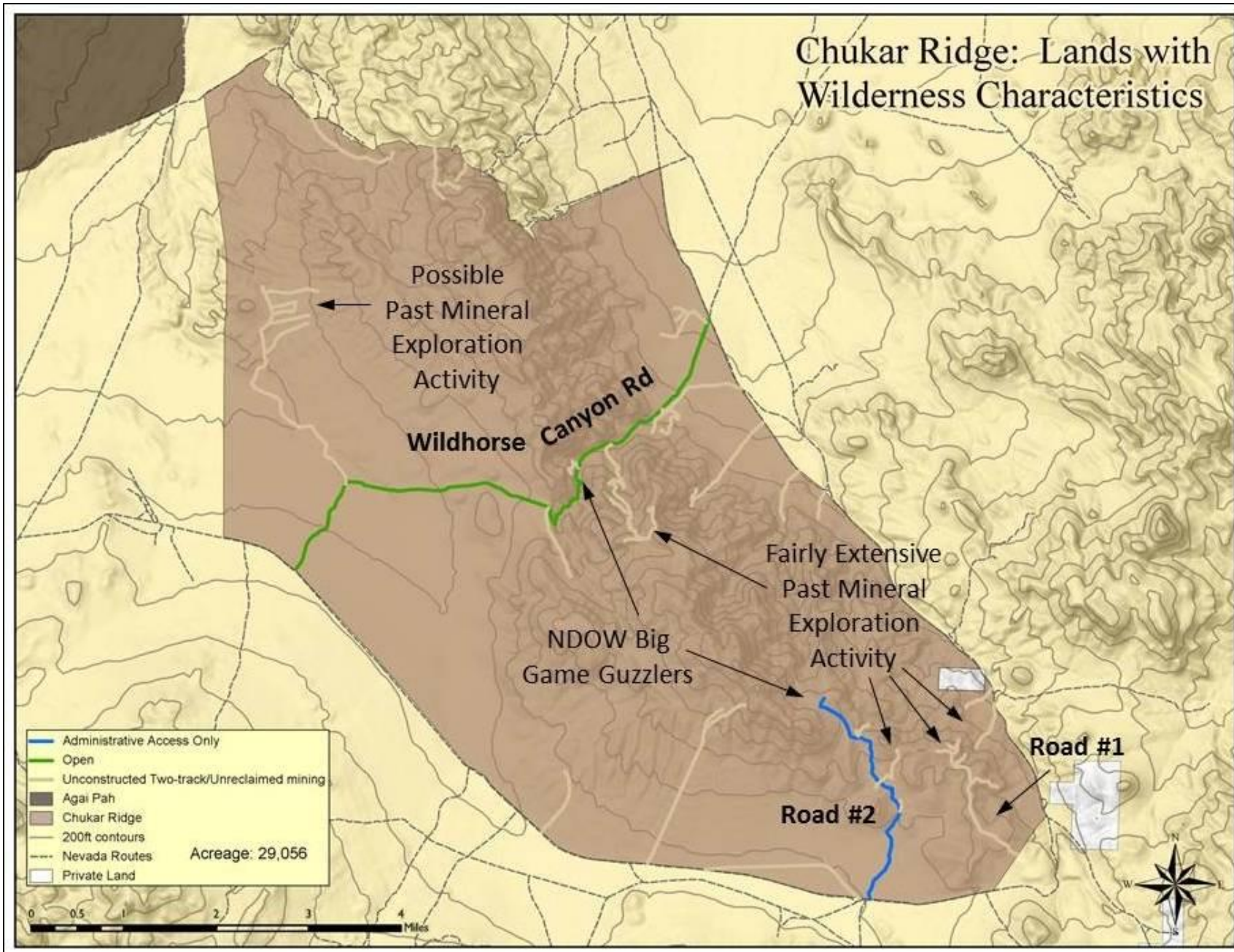
2. Chukar Ridge (aka Wildhorse Canyon), NV-030-405

- a. The Wildhorse Canyon road crosses the proposed LWC in the middle (from the Win Wan Valley road down Wildhorse Canyon to the Rabbit Spring road on the NE side of the ridge), which should preclude its consideration as an LWC. But the BLM then conveniently breaks the LWC into two parts. There are also numerous other roads into the area as shown on the BLM’s own map (Fig. 1). The majority of these roads are shown as “Unconstructed Two-track/Unreclaimed mining” roads. I surveyed with my GPS unit all of the road marked as Road #1 (about 2 miles in length) and part of Road #2 (Tables 1 and 2). These are good, prominent roads (Photos 2 to 12). To suggest that these roads are fading into the background—“some minor surface disturbance related to mining reclamation, but the disturbance is substantially unnoticeable” (Full\_LWC.pdf file)—is ludicrous. The document named Chukar\_WILDERNESS\_CHARACTERISTICS.pdf discusses the numerous roads and other mining disturbance and recommends either cherry-stemming them out or “closure and reclamation”, i.e. they are not so “unnoticeable” as discussed in the Full\_LWC.pdf file. Downtown Carson City could be converted to roadless wilderness with enough “reclamation and closure”. The file named Chukar\_-\_Standard.pdf has numerous photos of roads and other disturbance in the proposed

LWC. Many of them appear to be designed to show faint tracks, natural reclamation, etc., but in the aerial photographs, many of these photo sites are taken at intersections with more prominent roads. I also note that the photographers (whom I presume to be FNW personnel) drove to all of the photo sites in a full size truck, i.e., it is not so roadless or wilderness in character that they actually would have had to hike in.

**Table 1. Chukar Ridge Road #1 GPS Survey (UTM Zone 11S)**

Way-point	Date	UTM NAD27		UTM NAD83		Elevation		Location
		East m	North m	East m	North m	m	ft	
21	04/03/15	391,809	4,279,419	391,729	4,279,618	2068	6784	Rhyolite Pass rd photo
22	04/03/15	391,236	4,280,311	391,156	4,280,510	2009	6591	Rhyolite Pass rd photo
23	04/03/15	388,935	4,280,680	388,855	4,280,879	1957	6419	Jct. WinWan & powerline roads
24	04/03/15	389,346	4,281,288	389,266	4,281,487	1999	6557	Jct powerln rd & Rd #1
25	04/03/15	389,284	4,281,317	389,204	4,281,516	1998	6555	Road #1
26	04/03/15	389,213	4,281,374	389,132	4,281,573	2003	6572	Road #1
27	04/03/15	389,163	4,281,462	389,083	4,281,661	2016	6613	Road #1
28	04/03/15	388,993	4,281,563	388,913	4,281,763	2046	6714	Road #1
29	04/03/15	388,953	4,281,605	388,873	4,281,804	2045	6710	Road #1
30	04/03/15	388,831	4,281,658	388,751	4,281,857	2033	6669	Road #1
31	04/03/15	388,692	4,281,733	388,612	4,281,932	2044	6705	Road #1
32	04/03/15	388,658	4,281,816	388,578	4,282,016	2037	6682	Road #1
33	04/03/15	388,628	4,281,860	388,548	4,282,059	2036	6680	Road #1
34	04/03/15	388,543	4,282,045	388,463	4,282,244	2034	6672	Road #1
35	04/03/15	388,518	4,282,038	388,438	4,282,237	2034	6674	Prospect pit adj. Rd #1
36	04/03/15	388,527	4,282,100	388,447	4,282,299	2030	6660	Road #1
37	04/03/15	388,518	4,282,110	388,438	4,282,309	2026	6647	Road #1
38	04/03/15	388,520	4,282,143	388,439	4,282,343	2025	6645	Road #1
39	04/03/15	388,526	4,282,185	388,446	4,282,384	2018	6622	Road #1
40	04/03/15	388,524	4,282,349	388,444	4,282,548	2039	6691	Road #1
41	04/03/15	388,488	4,282,440	388,408	4,282,639	2045	6708	Road #1
42	04/03/15	388,497	4,282,461	388,417	4,282,660	2044	6706	Road #1
43	04/03/15	388,528	4,282,515	388,448	4,282,714	2044	6706	Jct. Road #1 & Rd #1A
44	04/03/15	388,590	4,282,563	388,510	4,282,762	2049	6724	Road #1A
45	04/03/15	388,614	4,282,613	388,534	4,282,812	2054	6740	Road #1A
46	04/03/15	388,660	4,282,613	388,580	4,282,812	2048	6718	Road #1A, still going, faint
47	04/03/15	388,517	4,282,733	388,437	4,282,932	2021	6631	Road #1
48	04/03/15	388,457	4,282,806	388,377	4,283,005	2013	6605	Road #1
49	04/03/15	388,375	4,282,823	388,295	4,283,022	2017	6617	Road #1
50	04/03/15	388,338	4,282,817	388,258	4,283,016	2015	6610	Jct Road #1 & reclaimed drill rd
51	04/03/15	388,283	4,282,812	388,203	4,283,012	2017	6618	Road #1
52	04/03/15	388,210	4,282,889	388,130	4,283,088	2032	6667	Road #1
53	04/03/15	388,187	4,283,082	388,106	4,283,281	2067	6781	Road #1
54	04/03/15	388,109	4,283,103	388,029	4,283,302	2076	6810	Road #1
55	04/03/15	388,001	4,283,085	387,921	4,283,285	2071	6795	Road #1
56	04/03/15	387,950	4,283,097	387,870	4,283,297	2068	6785	Road #1 end



**Figure 1. BLM Map of Proposed Chukar Ridge/Wildhorse Canyon LWC with Labels Added.**

**Table 2. Chukar Ridge Road #2 Partial GPS Survey (UTM Zone 11S)**

Way-point	Date	UTM NAD27		UTM NAD83		Elevation		Location
		East m	North m	East m	North m	m	ft	
57	04/03/15	386,778	4,280,528	386,698	4,280,727	1894	6214	Jct. WinWan-IndianHd-Road #2
58	04/03/15	386,758	4,280,626	386,678	4,280,825	1892	6207	Road #2
59	04/03/15	386,811	4,280,701	386,731	4,280,900	1891	6203	Road #2
60	04/03/15	386,856	4,280,856	386,776	4,281,055	1892	6208	Road #2
61	04/03/15	387,050	4,281,032	386,970	4,281,231	1904	6248	Road #2
62	04/03/15	387,126	4,281,191	387,046	4,281,390	1912	6273	Road #2
63	04/03/15	387,114	4,281,289	387,034	4,281,488	1914	6278	Road #2
64	04/03/15	387,158	4,281,435	387,078	4,281,635	1921	6304	Road #2
65	04/03/15	387,154	4,281,579	387,074	4,281,778	1928	6326	Road #2
66	04/03/15	387,075	4,281,682	386,995	4,281,881	1930	6333	Road #2
67	04/03/15	387,195	4,281,829	387,115	4,282,028	1935	6348	Road #2
68	04/03/15	387,212	4,281,879	387,131	4,282,078	1938	6357	Road #2
69	04/03/15	387,250	4,281,916	387,170	4,282,116	1938	6359	Road #2
70	04/03/15	387,308	4,282,026	387,228	4,282,226	1942	6372	Road #2
71	04/03/15	387,268	4,282,181	387,187	4,282,381	1949	6394	Road #2
72	04/03/15	387,173	4,282,265	387,093	4,282,465	1957	6420	Road #2
73	04/03/15	387,172	4,282,369	387,092	4,282,569	1961	6433	Road #2
74	04/03/15	387,142	4,282,457	387,062	4,282,656	1967	6453	Road #2
75	04/03/15	387,020	4,282,492	386,940	4,282,692	1976	6482	Road #2
76	04/03/15	386,951	4,282,550	386,871	4,282,749	1981	6498	Jct Rd#2&faint Rd#2A
77	04/03/15	386,885	4,282,496	386,805	4,282,695	1986	6516	Faint Road #2A end
78	04/03/15	386,900	4,282,594	386,820	4,282,793	1979	6492	Road #2, <u>still going</u>
79	04/03/15	387,973	4,280,473	387,893	4,280,672	1928	6326	WinWan road photo



**Photo 2.** Chukar Ridge taken from waypoint 22 on Rhyolite Pass/Rabbit Spring road 1.3 mi. off SE end of the LWC. Note prominent Road #1 on the LWC on the ridge in front of the mountain.



**Photo 3.** Road #1 on the LWC heading NW up the hill from its junction with the powerline road (waypoint 24) that forms the SE boundary of the proposed LWC. Photo taken from a point about 80 m to the SE of the junction.



**Photos 4 and 5.** At waypoint 31, Road #1 looking SE (left) and NW (right).





**Photos 6 and 7.** Prospect pit adjacent to Road #1 at waypoint 35 (left), and Road #1 with reclaimed trenches from waypoint 38 (right), both looking NW.



**Photo 8.** Prospect pit adjacent to Road #1 at waypoint 41.



**Photo 9.** From waypoint 53 looking NW at Road #1 (right edge of photo and going up distant ridge) and at reclaimed drill road (flat gradient).



**Photos 10 and 11.** Road #2 looking N from waypoint 59 (left) and SE from waypoint 76 (right).



**Photo 12.** Road #2 looking NW from waypoint 78.

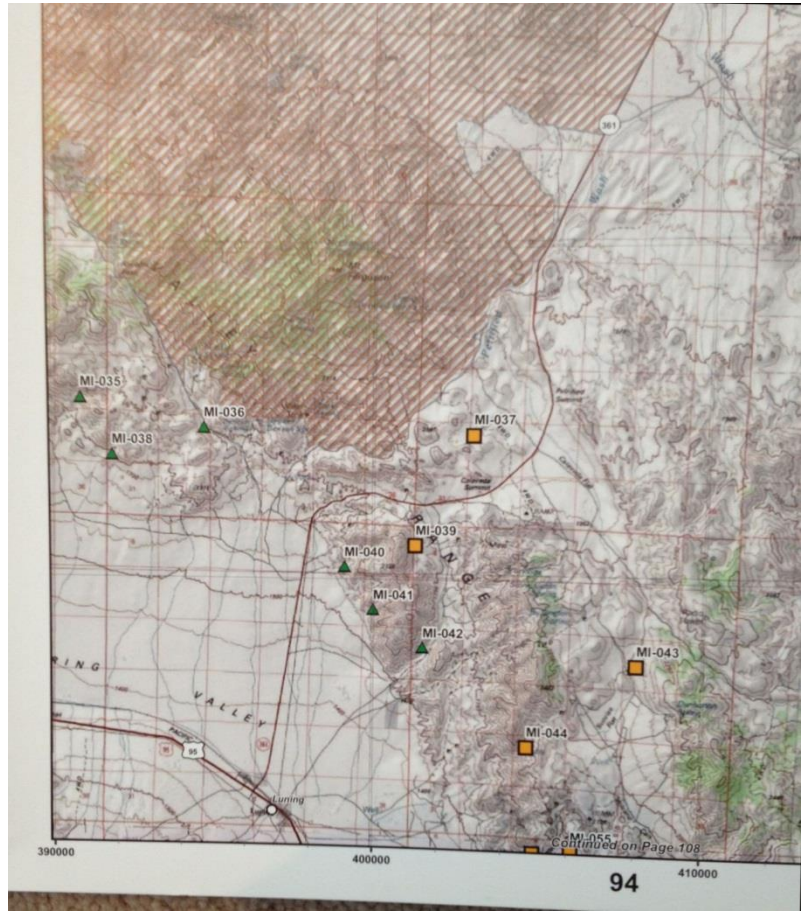
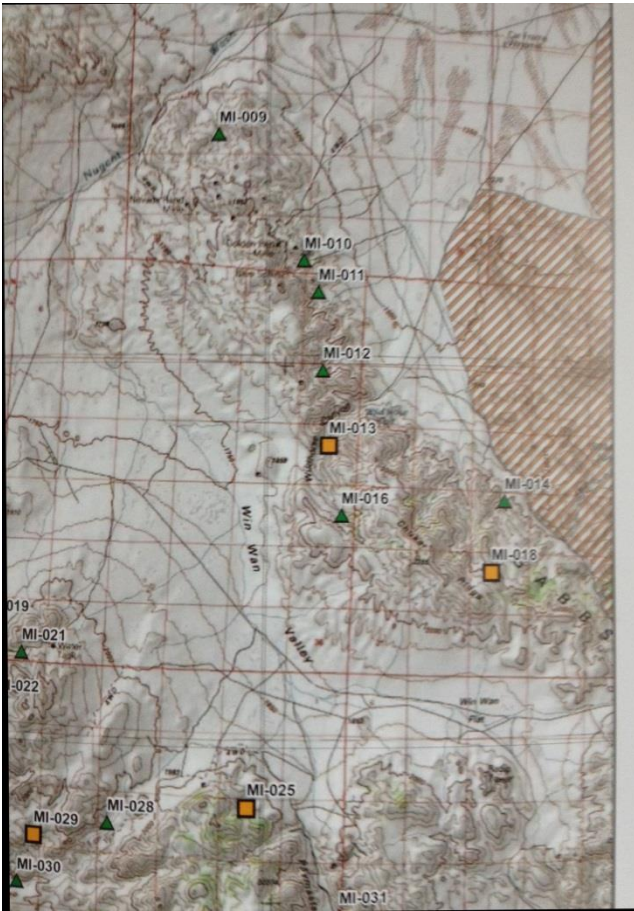
- b. In the WILDERNESS\_CHARACTERISTICS file, I find the descriptions of naturalness, solitude, primitive and unconfined recreation, and supplemental values to be glossy pap designed to convert ordinary Nevada landscape into a new Yosemite Valley in the reader's eyes. Witness the final photograph in the file which shows a nice sunrise or sunset photo of a bare, uninteresting ridge. Photos 13 and 14 along with the road photos (2 to 12) in my comments show a relatively bland landscape with virtually no especially interesting topographic features or much vegetation; i.e., there are very few supplemental values on the ridge. An item listed in the Full\_LWC file under supplemental values, in addition to some bighorn sheep, is "Rhyolite and other volcanic rock formations are found in the unit.", a statement which is perhaps inclusive of 50% of the state of Nevada.



**Photos 13 and 14.** General photos of Chukar Ridge showing bland, non-outstanding characteristics: (Top) Looking W from waypoint 31 on Road #1, Road #2 visible in the valley and on the ridge in front of highest mountain; (Bottom) Looking NNW from waypoint 79 on Win Wan Valley road.

- c. There are a large number of prospect pits and other old workings on the ridge (Photos 6 and 8). There is recent (within the last 20 years) drilling activity in the Wildhorse Canyon drainage and the southeast portion of the ridge, which has been reclaimed (Photos 7 and 9). Despite the reclamation, the “naturalness” of the area has been significantly affected by various old and new human impacts, which should disqualify it from consideration as an LWC.
- d. There are several hundred currently active mining claims on the ridge, mainly controlled by two companies, with the expectation that additional exploration activity including road building and drilling will be undertaken. One of the companies is currently focused on permitting a gold mine at Isabella-Pearl 6.5 miles off the southeast end of the proposed LWC; once in production this operation will likely sponsor a significant level of exploration activity on its other claims including those in the proposed LWC. Please check your LR2000 claim database.
- e. The favorable geology at the Isabella-Pearl site and at the nearby Santa Fe mine (1980’s-1990’s production of something like 300,000 oz gold) and related prospects continues NW along the full length of Chukar Ridge (the full length of the proposed LWC) and on to the old Blue Sphinx and Nevada Rand mines off the NW end of the LWC. Significant amounts of exploration have taken place in the Blue Sphinx-Nevada Rand area and on the proposed LWC and will likely take place again in the future. In my opinion, there is very significant mineral potential on the ridge.
- f. The evaluation criteria listed in the Full\_LWC report are confusing and contradictory. The 1979 evaluation listed the area as unsuitable for all three of naturalness, solitude, and primitive and unconfined recreation. The 2014 evaluation seems to fall back on a lame statement that “BLM guidelines for evaluating LWC have changed since 1980” and “New information from citizen-based proposals”, i.e. parroted from an environmental group (FNW) proposal without a solid evaluation by BLM personnel. The citizen-based proposal apparently discusses such fairly meaningless criteria as “expansive ridgelines ... and alluvial fans” and “challenging hikes, backpacking, stargazing ...”, phrases which are repeated in the BLM 2014 Inventory. Even at that, the 2014 evaluation states ”The north parcel ... exhibits some surface disturbance related to mining reclamation, but the disturbance is substantially unnoticeable” and “The south parcel [shows] some minor surface disturbance related to mining reclamation, but the disturbance is substantially unnoticeable.” While it appears that the mining industry has done a good job of reclaiming its exploration activities, I disagree that the activity has been only “minor”. In fact I believe that there will be significant ongoing industry interest in this area.
- g. The second evaluation under NV-030-405 is confusing, but appears to represent the parts of the original 1979 area removed from consideration under the 2014 proposed LWC, i.e. the north part (Nevada Rand and Blue Sphinx mines area), the Wildhorse

- Canyon road, and a fenceline and corral at the southern end. Nevertheless, there are statements in this evaluation that I believe apply better to the entire 2014 proposed LWC as discussed in item (f) above. For example, under naturalness: “The north end or ‘tip’ of the unit exhibits enough mining related surface disturbance to warrant this northern area unnatural. ... several occurrences of noxious weed infestations in Wildhorse Canyon. ... A small study plot enclosure exists south of Wildhorse Canyon.” Under solitude: “no outstanding opportunities for solitude in the unit that are superior to its kind. The opportunities for solitude in this unit are represented throughout the CCDO.” Under primitive and unconfined recreation: “no outstanding opportunities for primitive and unconfined recreation in the unit that are superior to its kind. The opportunities for primitive and unconfined recreation in this unit are represented throughout the CCDO.” That is, I believe that the statements regarding “opportunities ... represented throughout the CCDO” apply equally to the full proposed LWC and that the LWC represents nothing special in terms of landscape.
- h. There appear to be 6 NDOW guzzlers in the proposed LWC including two big game guzzlers (Figs. 2 and 3, Table 3). NDOW needs access to these installations for maintenance. It appears that my Road #2 goes to big game guzzler MI-18 (Fig. 1). This road is marked as “Administrative Access Only” which I presume might include NDOW. Nevertheless, this supposedly “roadless” area will have a maintained road, but for government use only. Too bad ordinary citizens cannot be trusted to drive the road, even though many ordinary citizens through Nevada Bighorns Unlimited (NBU) helped to build the guzzler in the first place. Sherwood Forest revisited. Also, this map reveals BLM’s true plan for managing Chukar Ridge and the other LWC—basically to keep the public out.
  - i. The public’s best interest would be served by leaving Chukar Ridge out of an LWC designation and available for multiple use including mineral exploration and potential mining.
3. Agai Pah Hills (aka Gillis Range North), NV-030-402
- a. I do not know very many specifics about this area, but even on the Walker Lake 1:100,000 scale topo map, there are a number of roads and 4WD trails into and across it. I fail to see how it could even be considered as an LWC.
  - b. Information from a 3<sup>rd</sup> party source indicates that this area has been heavily overgrazed by feral horses.



**Figures 2 and 3. Photos of parts of pages 93 and 94 from NDOW Water Development Atlas showing locations of guzzlers.** Guzzlers MI-11 to 14, 16 and 18 are on the proposed Chukar Ridge LWC. MI-10 is on the north edge. Orange squares are big game guzzlers and blue triangles are small game guzzlers. Diagonal lines mark the Gabbs Valley Range WSA.

**Table 3. NDOW Guzzler Coordinates in Proposed Chukar Ridge LWC (from Water Development Atlas)**

No.	Date	UTM NAD27		UTM NAD83		Elevation		Location
		East m	North m	East m	North m	m	ft	
MI-10		381,004	4,292,513	380,924	4,292,712			Small game guzzler
MI-11		381,397	4,291,689	381,317	4,291,888			Small game guzzler
MI-12		381,532	4,289,618	381,452	4,289,817			Small game guzzler
MI-13		381,698	4,287,609	381,618	4,287,808			Big game guzzler
MI-14		386,450	4,286,191	386,370	4,286,390			Small game guzzler
MI-16		382,047	4,285,768	381,967	4,285,967			Small game guzzler
MI-18		386,085	4,284,285	386,005	4,284,484			Big game guzzler

4. Excelsior North (aka Excelsior Mountains), NV-030-425
  - a. The Camp Douglas mining district at the NE end of the proposed Excelsior North LWC has been an area of significant past precious metal production and modern mineral exploration. Exploration activity in this district is on-going and the mineral potential is very significant.
  - b. Some of the Camp Douglas district is outside of the proposed LWC boundary, but portions of the geologically favorable area fall within the LWC.
  - c. There are a number of roads into the proposed LWC: Silver Dyke Canyon, the Silver Dyke mine, W side of Moho Mountain, the Birdsong-Endowment-Black Hawk mine area, plus portions of the main old Camp Douglas workings.
  
5. Excelsior South (aka Teels Marsh-Basalt), NV-030-430
  - a. The road to the old Noquez mine is within this proposed LWC.
  - b. A new NDOW big game guzzler constructed on March 14, 2015, is located on the LWC north-northwest of the Eastside mine at GPS coordinates 383,009 E, 4,218,020 N (NAD83).
  - c. Topographically this seems to be a particularly uninteresting area.
  - d. The BLM's inventory in the Full\_LWC.pdf file states that "Adjacent USFS lands are not WSA or areas of Recommended Wilderness.", nor should this proposed LWC be established. The "solitude" line item is checked No, but the 2014 Inventory description states that "New information from citizen based proposal was considered ... it is the conclusion of this evaluation that there are outstanding opportunities for solitude ... that are superior to its kind"; this is indicative of the degree to which the BLM simply accepted biased material from an environmental group.
  - e. Information from a 3<sup>rd</sup> party source indicates that there is an exploration project in this area which is to the point of a mineral resource is being defined.
  
6. Rawe Peak, NV-030-517 (and Lyon Peak, NV-030-520)
  - a. According to the Full\_LWC.pdf file, "The 2014 inventory found that the unit needed to be divided into two subunits because of a constructed, maintained route that crosses the range ..." The 1980 inventories of the various LWC evaluation criteria are spot-on in terms of things like "man-caused intrusions ... mining disturbances, roads, water catchment devices", a BLM-authorized communications site, private land parcels, roads, road and dozer scars from fire suppression, etc. Many of these items have been removed by parceling out tracts or cherry-stemming roads, but as the 1980 inventory says, "A person cannot get as far as two miles away from the unit boundary at any point in the unit. This distance is not great enough to contribute outstanding quality to the opportunity for solitude." There are several similar statements. In addition the unit is immediately adjacent to the communities of Carson City and Dayton—not exactly solitude. But the 2014 Inventories contradict the



earlier evaluations glaringly—how can this be? I believe that the 2014 Inventories are completely out of line and were simply made up to fit the nominal description of wilderness by FNW and adopted by BLM without much objective evaluation.

- b. The proposed LWC borders the Como mining area on its south side and the Hercules mine on its north side, both of which appear to be cherry stemmed out. Nevertheless the currently proposed LWC boundary would include both some old mining activity and areas of significant mineral potential adjacent to the known mineral occurrences. Modern exploration has taken place in this district in the past and may again in the future. See the following two reports: “Economic Geology and Potential for Gold Discovery at the Como Gold Project, with Recommendations for Exploration”, NI43-101 report prepared for Royal Standard Minerals Inc. by D. Strachan, T. Master, and D. Hudson, 2003; and “Technical Report on the Hercules Property, Lyon County, Nevada”, prepared for Iconic Minerals, Ltd. by D.H. McGibbon, 2013. The latter report describes a previous resource estimate for Hercules, non-compliant with current Canadian NI43-101 resource standards, of about 900,000 ounces of gold, which despite being “non-compliant” is indicative of a very significant undeveloped gold resource.
- c. The Lyon Peak proposed LWC is similar to Rawe Peak in terms of human intrusions such as roads and power lines, and there is a significant percentage of private land. There is no reason for this to be considered as LWC.

7. Tule Peak (aka Virginia Mountains), NV-030-605

- a. There are numerous roads and trails and tracts of private land within this proposed LWC. It was necessary in the 1980 evaluation to break the unit up into at least 5 subunits; the 2014 Inventory has combined some of the subunits into “a core unit ... made possible by combining units that no longer were separated from other units by roads. Boundary roads from the 1980 inventory were either not being maintained or were in a state of natural reclamation. External new information from citizen proposals was also considered in the evaluation.” Once again it sounds as if the prior evaluation, which was quite thorough, was simply rewritten in 2014 to say “yes” to the various wilderness characteristics; that is to say, environmental politics trumps reality. On the basis of the inholdings of private land alone, let alone roads and other human developments, this tract should be precluded from consideration as an LWC.

## **B. Locatable Minerals**

1. Large areas of the Stillwater and Clan Alpine ranges are to be recommended for closure to mineral entry in most of the alternatives under consideration including Alternative E. I do not understand the need for this. Clearly there is little incentive for staking and exploration in the existing WSA’s, but much of the area proposed for closing to location

is currently open to multiple use. Why close them off? It appears this has something to do with the military, but I fail to see any real reason for a closing.

### **C. Travel and Transportation**

1. Under BLM's preferred Alternative (Alt. E) motorized travel or motorized and mechanized travel is to be restricted to existing routes on essentially all of the BLM-managed land in the CCD. I suggest this is impractical. What about a BLM surveyor who takes an ATV cross country to find section corners and conduct a land survey? Will you follow your own rules? I recommend that other criteria should be used in order to prevent undue damage; criteria that allow low impact motorized and mechanized use. During minerals exploration ATV's are used during reconnaissance and in the claim staking process and for transport of soil and other types of samples from large areas with negligible impact on the terrain. Hunters use ATV's, mostly on existing trails, but also to retrieve animals and for other one-time uses. Cattlemen use ATV's. These low-impact uses leave no real traces. I realize that there are certain areas where repeated ATV use has created problems, but these are not extensive. Why close everything down because of problems in relatively small areas?—Deal with those areas separately.
2. The term “existing routes” is deceiving because, of the true existing roads and trails, the agency generally picks a few and closes the rest, effectively reducing access to the public land. I object to this reduced access. The public land should be open to access on all existing roads and trails (“ways”).

### **D. Wild Horses**

1. The BLM has a difficult job in managing the controversial issue of wild horses and burros and has had to persevere in reducing wild horse and burro populations on the public lands in spite of vocal opposition from horse advocates. However, I feel that not enough of the feral horses are removed from the range or otherwise dealt with by sterilization or other means. The horses overgraze many areas resulting in damage to the range and negative impacts to native Nevada wildlife—deer, pronghorn, bighorn sheep, elk, etc.—and negative impacts to the horses themselves as well in terms of starvation. I wish there were management alternatives available in order to dispose of the majority of the removed horses without having to take care of them for the rest of their lives. The Wild Horse and Burro Act should be repealed so that horses and burros could be managed like any other wildlife species. In the meantime, please step up the removal process or take other measures to reduce the population.
2. I do not have specific comments on the proposed Herd Management Areas other than to say these areas should be eliminated whenever horses vacate a given Herd Area, as you are apparently proposing in Alternative E.

## E. General Comments

1. The plethora 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 federal land. This defeats the stated purpose of multiple land use. The agenda seems to be to exclude/drive out people who might actually use the land.
2. In my view, no-action Alternative A (the current situation) is the best alternative, and in reality keeps options open for a variety of future resource uses, which include scenic and wildlife resources as well as economic uses. The language on page ES-15 says, "... FLPMA mandates that BLM-administered lands be managed for multiple use and sustained yield ..." which, to me, means keeping them open to multiple (future) use. These areas are not going to be overrun with "land-rapers". Preserving the opportunity for economic uses when a resource is discovered or an opportunity developed is important for the country and the state of Nevada. When developments occur, they will affect modest amounts of the total land package. Closing huge tracts of land to everybody but a backpacker makes no sense, especially when the majority of the area has no special scenic value.
3. On page ES-17 under the Soils heading it is stated that "Alternatives C, D, and E would prohibit surface disturbance on slopes greater than 40 percent" (22°), presumably on all BLM land. This would preclude construction of a road on only moderately steep ground into any new project, such as a mineral prospect or energy project. Adequate erosion control measures can be built into most any such road and I believe that the rule is unnecessary.
4. Economic consequences. I feel that the economic consequences of the various Alternatives are inadequately addressed in the documents, particularly the effects of the LWCs, locatable mineral withdrawals, and travel and transportation restrictions.
5. The draft RMP and associated documents comprise such a large volume of material that it is impossible for one person to wade through it all. Such a massive tome should not be necessary to adequately manage even a relatively large area of generally open land.



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Gaylord Cleveland

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