

Supplemental Comments on BLM Carson City District Office Draft RMP

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I submitted comments on the BLM/CCDO Draft RMP on April 20, 2015 which fell 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. Following a subsequent visit to the proposed Chukar Ridge LWC (Wildhorse Canyon portion) on April 25, 2015, I here submit the following additional comments regarding this particular LWC and on LWC's in general. Please consider these comments supplemental to those that I made earlier.

A. Lands with Wilderness Characteristics (LWC)

1. General

- a. Lack of notification. So far as I am aware, owners of mining claims, both patented (private land) and unpatented (BLM-managed federal land), were not notified of the proposed establishment of LWC's or any other matters in the draft RMP which would directly affect them. Similarly I believe that ranchers with federal grazing allotments were not notified. This would seem to be contrary to federal rules and procedures, and contrary to common sense. Many such individuals were made aware of the proposed LWC's unofficially by friends or colleagues, but only at a very late date with little time to prepare documented comments.
- b. If LWC's are to be managed as wilderness, you will not be able to fight wildfires using motorized or mechanized equipment which could have a significant impact on the sagebrush ecosystem. One of the higher priorities of land use management presently is avoiding loss of habitat for the greater sage grouse. Therefore LWC's will likely have a negative impact on the grouse.
- c. Nevada Department of Wildlife big game guzzlers as described in my April 20 comments A.1.i. and A.2.h. require Environmental Assessments prior to construction, a process which can take up to several years. The presence of EA-permitted projects involving disturbance should preclude consideration of LWC's with big game guzzlers within them.

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

- a. In my April 20 comments I submitted GPS and photo evidence of two roads within the proposed LWC which I labeled as Roads #1 and #2 on Figure 1. I hereby submit some GPS and photo evidence regarding two other roads within the LWC that branch from the Wildhorse Canyon road—Roads #3 and #4 (Fig. 1, Photos 1 to 3, Table 1). These two roads have been bladed, i.e. constructed using mechanical equipment.

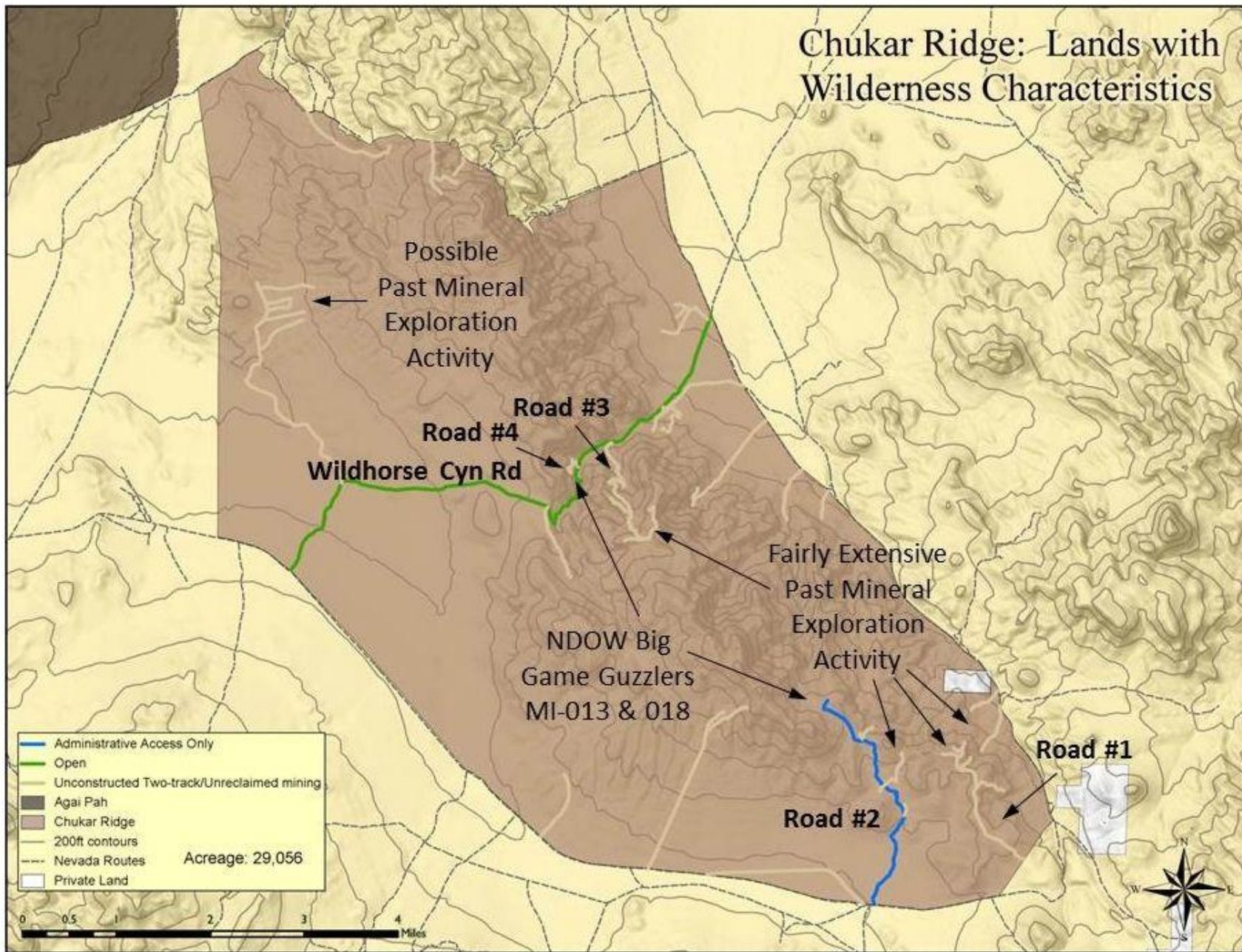


Figure 1. BLM Map of Proposed Chukar Ridge/Wildhorse Canyon LWC with Labels Added (revised April 27, 2015).



Photos 1 and 2. Road #3 at waypoints 87 looking SW (top) and 88 looking SE (bottom). Note bladed sections of the road and that it is well traveled. The road leads to a mining prospect with several constructed drill sites on the ridge in upper right of photo.



Photo 3. Junction of Road #4 with Wildhorse Canyon road in the wash bottom at waypoint 90 looking NW. Last few feet of Road #4 are washed out. Although brush is growing on Road #4, it is clearly a bladed (mechanically constructed) road. Road #4 leads to a mining prospect with constructed drill sites.

Table 1. Wildhorse Canyon Roads #3 and #4 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	
87	04/25/15	382,224	4,288,400	382,143	4,288,599	1683	5523	Road #3
88	04/25/15	382,198	4,288,275	382,118	4,288,475	1692	5551	Road #3
89	04/25/15	382,327	4,288,453	382,247	4,288,653	1666	5465	Jct Rd #3 & Wildhorse Rd
90	04/25/15	381,702	4,288,025	381,622	4,288,224	1709	5606	Jct Rd #4 & Wildhorse Rd
91	04/25/15	381,743	4,288,158	381,663	4,288,358	1700	5577	Wildhorse Rd, u. part Rd#4 visible

- b. In my comments of April 20, I documented the presence of 6 NDOW guzzlers in the proposed LWC including two big game guzzlers. On April 25 I was present during NDOW maintenance of one of the big game guzzlers, MI-013 (Photos 4 and 5, next page), and I collected GPS coordinates of the site (Table 2). Use of a backhoe was necessary to lower the elevation of the “drinker”. Even though this particular guzzler is located along Wildhorse Canyon road corridor and would presumably be on the edge of the LWC, it provides an example of the maintenance sometimes required for one of these installations. It seems to me that providing water for wildlife including big game and sage grouse, and maintaining those water supplies, is a higher and better purpose than segregating an area with no motorized or mechanical access.

**Table 2. NDOW Guzzler Coordinates in Proposed Chukar Ridge LWC
(dated coordinates are from my GPS survey, undated coordinates are from
NDOW’s Water Development Atlas)**

No.	Date	UTM NAD27		UTM NAD83		Elevation		Location
		East m	North m	East m	North m	m	ft	
MI-010		381,004	4,292,513	380,924	4,292,712			Small game guzzler
MI-011		381,397	4,291,689	381,317	4,291,888			Small game guzzler
MI-012		381,532	4,289,618	381,452	4,289,817			Small game guzzler
MI-013		381,698	4,287,609	381,618	4,287,808			Big game guzzler
MI-013 wypt 85	04/25/15	381,699	4,287,603	381,619	4,287,802	1748	5736	MI-013 apron, front center
MI-013 wypt 86	04/25/15	381,697	4,287,591	381,617	4,287,791	1750	5743	MI-013 new drinker
MI-014		386,450	4,286,191	386,370	4,286,390			Small game guzzler
MI-016		382,047	4,285,768	381,967	4,285,967			Small game guzzler
MI-018		386,085	4,284,285	386,005	4,284,484			Big game guzzler



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Photos 4 and 5. Repair activity at NDOW big game guzzler MI-013, April 25, 2015, located along Wildhorse Canyon road (in wash bottom).