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March 23, 2014

Thank you for the opportunity to Comment on The CCDO Draft Resource Management Plan and Draft EIS. I am an Exploration Geologist who has over 45 years of geologic experience, mostly in the mineral industry. From 1987-93 I worked in the Walker Lane Region of NV-CA, with Asarco, Inc. with considerable time in the territory of the CCDO. During that time I drilled well over 150 exploration drill holes for gold, silver & base metals in the CCD, some on private patented land and some with 6 individual BLM NOI permits, expending well in excess of \$1 million in today's dollars. Up to several 100 thousand ounces of inferred gold resources were developed, mostly on the Camp Douglas patents, west of Mina in the Excelsior Range, some resources were delineated on unpatented claims. Other areas were not quite so good but intercepted interesting mineralization that others now have claimed.

One area that I drilled in southern Gabbs Valley encountered 4 square miles of near-boiling water within several 100 feet of the surface in 8 holes drilled in 1990-93. This area has become, since fall 2013, a 16 MW Geothermal Power Plant (soon to be 35 MW) developed by Ormat: called Wild Rose, Dead Horse, Car, now Don Campbell Plant (visible on Google Earth). It took up to 20 years for drilling, originally for Au-Ag, based on strong geophysical anomalies, testing and State & Federal Permitting plus NV Energy power-line construction to become a renewable economic resource for Mineral County, Nevada and Southern California. It should be noted that Ormat's Geothermal Leases are essential contiguous to the "unacceptable" Gabbs Valley WSA. References to this work are below. Beside minor work in the late 1990s I've done little long-term work in the region since the 1990s but have visited various prospects and have kept up on mineral developments and resource happenings in the various counties and towns.

Since mid-Jan. 2015, when I first became aware of this CCDO project, I have reviewed the voluminous RMP documents posted on the website: some just skimmed; others in great detail. I attended the crowded January 24th RMP Work Shop in CC, spoke at length with BLM geologist Dan Erbes and several other BLM specialists. I also made 3 minutes of comments at the crowded BLM RMP Hearing in Fallon on March 19. I'm a member of the Geological Society of Nevada, Nevada Petroleum and Geothermal Society, the Nevada Minerals Exploration Coalition, a Certified Professional Geologist, CPG 10389 with the American Institute of Professional Geologists, however these comments are my own.

I will mostly confine my comments to matters relating to exploration/mining and access, the Mineral Resource Report and the Nov 2014 Report/Recommendations/Dec 2014 Unit Reports on Lands with Wilderness Characteristics which were not at all emphasized during the scoping period/discussions for this RMP.

The Mineral Potential Assessment Report (and Mineral Section in Chap 3 pp. 156-162) is incomplete and uses very dated information. The 14 pages containing geologic history, lithology and tectonics are overly long for a report such as this. Comments on mining and exploration history over the last 40-50

years are perfunctory and minimal. Table 3-29, p3-157 lists, but does not map, the 24 active mineral PoO in the CCD (only 3 are Exploration PoO, the rest are Mine PoO including 9 for non-metallics). The 37 current NOI level Projects (< 5 acres disturbance) are not tabulated or mapped nor are previous NOI dating back to 1976 (FLPMA) which must number in the 100s. Many of the PoO are old (latest 3/1/11) and not actually operating. Expired reclaimed PoO are not shown. There is no effort to tabulate or map old mines, production or published resources and reserves. All companies keep track of these items which indicate mineral potential. And yes, mineral exploration is cyclic depending on pricing and adequate auspicious ground to explore as well as government permitting delays.

There is some short discussion of the only operating gold mine-Rawhide- Map S-1 shows it in a barely visible cross- (change to a bigger red dot) and there is little mention of Santa Fe or Paradise Peak mines (except the Gabbs Magnesite Mine). Paradise Peak (S. of Gabbs) and satellite mines are on the edge of the of the CCD boundary- mostly just within the BLM Battle Mtn. District. These 3 major gold & silver mines alone produced from 1986-2010 about 3.5 million ounces of Au and 55 million ounces of Ag- worth about \$5.0 billion at today's prices- with Rawhide still with minor residual Au-Ag production. Not to mention hundreds of high-paying jobs generated during that time. New drilling in the Paradise Peak area is still going on. Likewise there is little mention of activities, production, and reserves at former large operations at Candelaria, Buckskin, Jessup, Borealis, Aurora, Bruner http://www.minquestinc.com/index.php?option=com_k2&view=item&layout=item&id=35&Itemid=171, Bell Mtn (<http://finance.yahoo.com/news/lincoln-mining-begins-drilling-bell-172105282.html>) , Talapoosa, M2-Smith and other deposits within the last 30-40 years. For example Talapoosa, 25 miles NE of the Comstock has recently announced resources of 1.3 million oz Au and 16 million oz Ag- valued at \$1.6 billion at present prices. Activities at all of these properties are easily checked on the internet but little or no effort on this front was made by CCDO Team or their contractors.

There is some discussion of the Yerington Area but nothing on the Pumpkin Hollow/Nevada Copper/Yerington/BLM land transfer for the USFS Wovoka and other New NV Wilderness Areas in process of completion. Likewise there is only minimal mention of numerous Cu resources in the greater Yerington District. Also there is little or no mention of production or exploration drilling by Comstock Mining in spite of involving the BLM off of patented ground. There were a number of comments by residents & others about Comstock's Lucerne open pit, exploration & other operations on BLM surface rights in the Scoping section- that were not addressed anywhere in the draft that I could find. Operations/resources/production on patented inholdings in the CCD contribute to the evaluation of the region's mineral potential but are not mentioned. These omissions must have deliberate as any geologic or mining professional evaluating the mineral potential of the region would have included them. Of course in some of these areas the USFS controls to surface rights but the BLM controls the mineral rights to all Federal Lands. This cannot be an issue of the BLM withholding confidential business information?

Likewise 23,800 twenty+ acre lode claims in the CCD are totaled (~475,000 acres) but not tabulated by district or mapped in spite of the fact that they are registered with the BLM, shown on maps at the BLM State Office, included in the LR-2000 by ¼ sections with the BLM collecting ~\$155 per claim as an annual "rental" fee. This amounts to \$3.7 million fee income to the BLM besides filing & other claim fees. Note that this claim fee figure is much larger than the \$1.54 million income to CCD listed the SocioEconomic Report (Table 2-3). Apparently none of these claim fees are returned to the CCD but lease payments are? Why was this \$3.7 million income left out? This number of claims, exploration and mining activity hardly make the CCD dead of mining activity- although less than the 1980s-2010. I've got no exact figures on what has been spent on exploration and mineral development in recent years but this must amount to many tens or even hundreds of millions of dollars that helped the local economy.

In addition, in Nevada all of these mining claims & maps are also filed with individual County Recorders and are drafted on easily accessible county copies of 1"=2000' BLM Master Title Plats. This includes former (case-closed since 1976) and Active lode & Placer claims. Software also exists on BLM websites to plot these claims. Plotting these claims (present & past) would help to determine the mineral potential of an area, especially including Units re-evaluated for Lands to be Managed for Wilderness Characteristics. Most exploration & mining companies keep up claim maps for areas of interest from the above data as well as field reconnaissance of claim posts.

The argument that unpatented claims or leases may never be developed so do not have to be considered with other resources is invalid because they are paid for ("rented") annually. Also the argument that Valid Existing Rights will be respected within new Lands with Wilderness Characteristics is also invalid. Restrictions, advanced by NGOs, will prohibit new roads, earthwork and drilling- this has been happening since WSAs were designated before the early 1980s. Please show the historical number of NOI/PoO drilling permits with the CCD WSAs since they were formed- I suspect there were very few or none. We gave up on trying doing this on a BLM WSA east of Tonopah in 1992 after months of negotiation with the Tonopah BLM Field Office.

The sections on Exploration Methods; Geophysical and Geochemical p 2-15&16 are short and very incomplete. There are many more geophysical methods used these days besides magnetic & gravity including airborne and ground Electrical and Spectral Imagery Surveys, IP (induced potential) CSAMT- Controlled Source Auto-Magnetic Telluric, Seismic as well as digital aerial photography methods and Radar & LIDAR topographic surveying. The NURE Geochemical data cited is very dated, primitive and there are many more recent surveys published by the USGS, NV Bureau of Mines and Geology, various Universities and stock exchange-required regulatory/technical reports for individual properties (www.sedar.com), available on the internet. Figures 4-3, -4 & -5 covering the whole state- showing Au-Ag potential and industrial minerals cannot be enlarged enough to be distinct and useful for evaluating various Units in the CCD. Geologic, alteration-mineralization mapping is also critical for evaluating mineral potential. Some bigger companies, unlike Canadian-based Jr. companies, do not release their exploration results, positive or negative, for reasons of confidentiality. However there is considerable information on mineral developments on the internet for the CCDO Territory.

The listing for various elements and industrial minerals p. 3-16 to 3-44 are useful but not complete. One element is hidden under Rare Earths: Lithium (not a REE) which is presently being explored for in Teels Marsh and other playas. (<http://dajin.ca/teels-marsh>: 269 placer claims; (also see USGS OFR-76-567.) Teels Marsh also has geothermal potential and a Geothermal Lease : Fig 3-1 Mineral Report. There are just-subboiling waters at 100 feet depth in several areas). Lithium is presently being produced in a big way from brines in Clayton Valley (Silver Peak) 50 miles SE of Teels Marsh. Lithium is essential for production of batteries for electronic devices and autos-Tesla's mega-plant under construction east of Sparks- which claims they will only use NV-produced Lithium- which is now in shortage. See the 2013 NPGS Report below for other recent information on Petroleum and Geothermal Potential.

Particularly useful for mineral exploration in the southern part of the CCD are the series of 17+ USGS MF-1382 Maps at 1:250,000 scale + Texts for the Walker Lake AMS Sheet from the 1970-80s, for example. These show geology, mineralization for various elements, age-dates, and various types of alteration. There is little mention of the work in this report done by the USGS or the NV Bur Mines and Geology and various universities or professional societies concerning mineral exploration in the CCD. Such organizations were not even contacted during Scoping although, for some reason, the Nevada

Department of Minerals in Carson City turned down the opportunity to participate. No call was specifically put out to the mineral exploration community, claim or lease owners to participate in Scoping. Nor were any of the claim or stake holders in the CCDO contacted to date, to my knowledge.

One of the main problem with the Draft Report concerns the nominated **Lands with Wilderness Characteristics**, possibly what were previous considered “Wild Lands” several years ago, and the somewhat confusing updated 141 Wilderness Inventory Unit Reports (84 MB !) from 1980 associated with these areas. An initial problem is that many of these areas have changed names from the LWC listed on say figure 2-9 of Volume 1, those listed on Table C of the Rept on LWC (11/28/14) and those discussed in detail on the LWC Unit Reports (12/22/14). Gillis Range North for Agai Pah Hills, Wild Horse Canyon for Chukar Ridge, Stewart Valley Hills for Finger Rock, Teels Marsh-Basalt for Excelsior South, Excelsior Mtns. for Excelsior North, Stillwater Range for Stillwater Additions and Mountain Well, Diamond Canyon and Job Peak for the Job South mess of areas. The later terms are those areas that the Friends of Nevada Wilderness (FNW), Wilderness Society, Sierra Club and other outside so-called Citizen Groups have recommended and lobbied for as Wilderness Areas for up to 3 or 4+ decades. I find it strange that their NGO recommended LWC units online at the website are almost exactly the 12 that are BLM recommended in LWC Alternatives C or E. However FNW apparently had input into other non-recommended areas or those excised by gerrymandering from “acceptable” LWC areas.

Furthermore the maps and air photos with many of the unit areas proposed for LWC are very fuzzy and crude and the sub-areas/polygons: from A-G or more for many of these areas are not delineated, nor are the roads and trails being discussed in the text shown or labeled on the maps. Therefore it is very difficult to follow the text descriptions in the unit reports. It is very clear that the older 1980 Unit outlines have been trimmed at the margins, split-up for cherry-stemmed roads of various quality and generally gerrymandered of non-LWC areas to fit the unspecified “new criteria for LWC”. Congress not DOI/USDA/USFWL should set the criteria for wilderness lands- as they have for WSAs and Declared Wilderness Areas. Revision of these criteria as “Inventory Update” by executive agencies is “policy” and may not be considered legal by the courts without Congressional Approval. Consideration of mineral potential has always been an important factor, set by Congress, in considering wilderness characteristics in individual units since 1964. Why has this been discontinued? What is the use of evaluating CCDO Mineral Potential if it is not applied to multiple use considerations of LWC and other areas? A mandate to Inventory is a mandate to Regulate and Forbid.

Unlike the USFS apparently the BLM does not number roads and trails except for internal discussions of things like these LWC evaluation units. I suspect that there are actually some numbers- perhaps used by interagency wildland fire crews. Many OHV/ATV and other BLM users have clamored for years for such maps but except for a few areas (the BLM CA Desert Conservation Area- if I remember correctly) the maps & official road numbers have not been forthcoming. The various editions of BLM Surface and Minerals Management Maps on USGS 1:100,000 Topography show many of these roads and trails as do more detailed USGS Topographic Maps- if not edited off for Roadless Mandates. In Nevada dry washes often de facto, usually 4WD roads. It would have been very helpful to have office copies of such maps with the proposed LWC outlined and showing all roads and trails- and available for public inspection, if not actually published online or on paper. Often such roads plus fences, water sources, wildlife guzzler and other works of man are shown on BLM grazing allotment and pasturage maps. The 8 ½ x 11” maps in the draft reports/EIS & Unit descriptions do not provide the necessary detail to evaluate the alternatives in most cases. This applies not only to LWC but also many other resource issues being considered. The often “poetic” descriptions of the Wilderness Characteristics on the Unit Reports appear to essentially paraphrase those descriptions of the same areas on the FNW Website. It is not

worth getting into a discussion here on various road types vs. 2-tracks, ways, trails etc. as these may become obscure in a few years if not regularly used and brushed. That the roads are still visible from the air and the ground means that are used with some regularity.

I also believe beside in the early 1980s as part of the Intensive Wilderness Evaluation Project, all of these LWC areas were also evaluated & rejected during the hearings for the 1989-91 Nevada Wilderness Bill (Excelsior was for sure as it was discussed while I was working in the district) based on the presence of mineralized areas, old mines and roads, and military activity. The property owner of the Camp Douglas Patents was quite concerned in the late 1980s that the BLM would take away his mining property access by wilderness declarations. I believe this is also the case while the number of wilderness areas in NV expanded from one to over 70 today? There is little or no mention of this in these reports. The Wilderness Study Report by the NV BLM in 1991 does give some consideration to these areas. These areas were also heavily lobbied for during in the 2007-08 era and the recent Nevada Copper BLM Land Transfer to Yerington and the designation of the Wovoka Wilderness. In addition the FNW group contacted several of the claim owners I know to attempt to get claim maps and information within several of these LWC units. I understand that the FNW were referred by claim owners to the State BLM Office or various County Recorders for these maps. FNW and others have held "flash mob" weekend hikes and camp-outs/BBQ/photo sessions in some of these LWC areas in recent years to build interest in Wilderness designations. These involve at most a few dozen people, according to their website photos. I'm told that Geocachers are sometimes found in these LWC areas- maybe not associated with these wilderness advocate groups. Most Geocachers use 4WD & ATVs if available. The BLM and NGOs have not considered the periodic heavy military use of surface and near-ground airspace around Hawthorne and Fallon. I understand that this was one of the major reasons that the Gabbs Valley WSA was considered unacceptable because of low-level military flights in the FAA-designated MOA.

A Quote from page 12 of Report on LWC, Nov 2014, CCD RMP Plan Revision, under *Naturalness*:

" During the review, visual impacts on an area's naturalness from mining activities for gold, silver, lead, **plutonium** and other minerals were readily evident by the presence of denuded tailing piles, road-cuts across steep hillsides, deforestation of native trees, side casting of spoils from mine shafts and adits, heap leach piles used for mineral extraction, town sites with surface disturbance from remaining infrastructure. The review found that polygons that may have been previously disqualified from meeting wilderness characteristics definition for naturalness at one time are slowly being reclaimed and such impacts are now substantially unnoticeable." Exactly who wrote this?

This is the confessed rationale for "saving" these LMWC- to prevent any future exploration, mining, road building or wood cutting or mechanized access. Note that the writers must have slept in 5th grade and subsequent chemistry classes. **Plutonium** is made in reactors- not mined. Where are the Pu mines in NV? I would guess that the 14 CCDO LWC Interdisciplinary Team Members (p11, Table A) and the Acting CCD Manager, who presumably are college graduates, read and approved the *Naturalness* statement. This casts great doubt on the validity of other statements/reviews made by this "Team." Also note that the team admits that disturbance becomes unnoticeable with time. Apparently this "Rewilding" or "Renewable, Sustainable Wilderness" is apparently one of the BLM new criteria for LWC. Very little evidence has been presented that this has happened in these LWC nominated areas. It is apparent that the Team has rejected the "Multiple Use" concept for public lands. It is necessary to show that this revegetation/rewilding has actually happened in these 12 units- not just take the biased word of "citizen" NGOs.

In addition, Au, Ag, Pb and Pu are elements or metals not “minerals” which many of us also learned in 5th grade. This misuse of the term “minerals” is throughout the various RMP Reports and many government reports in general. There are numerous examples of this kind of poor science and misuse of words scattered throughout these reports. Please review these usages with qualified professionals.

The Battle Mountain District Mineral Appraisal Report for their RMP from Jan 2012 is much more complete and useful while being considerably shorter.

Some comments on specific LWC nominations that I have visited and worked on over the years:

Excelsior North (NV-030-425) : I note that 1988 additions to the Garfield Flat Bombing Range of Aerojet General (transferred to the Hawthorne Army Ammo Plant ~ 2006) have been subtracted from the 1980 Boundary, the boundary margins clipped, but the indicated 2014 Unit 425 boundary appears to overlap significantly with heavily mineralized Unit 425A (Camp Douglas- Silver Dyke) that is always unacceptable for LWC. This is just plain sloppiness on the part of Arthur Cullan (a recreation specialist), Teresa J. Knutson and the “SFFO LWC Team” or those that put together the 84 MB Unit Reports. The 2014 re-evaluation of these units and polygons has appeared to have received more attention than any other of the 141 LWC Inventory Units. The USFS area in the west end of the Excelsior Range was apparently a designated Rare II Roadless and Primitive Area, then Further Planning Area at one time- I’m unsure of present status, but FNW is promoting this USFS area as well as the main BLM Excelsior range for Wilderness designation(see their website). All the numbered roads and sub-areas/polygons are impossible to discuss unless they are indicated on a more detailed map. The abrupt shift in evaluation findings from 1980 to 2014 make the several versions of the Unit Evaluations very difficult to follow.

There are a number of patented inholdings in Unit 425, reached by roads in the Mono Mtn. and Marietta Mines areas. Many of these roads/trails/2-tracks are not shown on maps but can be noted on Google Earth. If roads/ways are closed by LWC Designation how will inholders reach their property? These areas have numerous unpatented mining claims, some held for almost 50 years with drilling - perhaps 300 total holes. (In addition to the Camp Douglas holes mentioned above- my tiers of drill roads on the patents from 1988 are still visible on Google Earth- and extended mineralization off patented ground to the SW onto Unit 425.) Gold resources amounting to more than several 100,000 oz beside specialty clays and have been actively explored for in recent years.

(http://www.minquestinc.com/index.php?option=com_k2&view=item&layout=item&id=48&Itemid=187). Over 1 million pounds of Tungsten has been produced from Silver Dyke with considerable by-product Mo, Au and Ag. An old US Bureau of Mines Report:

<http://www.nbmgs.unr.edu/scans/4410/44100021.pdf> There are a number of current videos on the internet on the Silver Dyke area including the following of a dangerous and somewhat foolish underground mine visit. <https://www.youtube.com/watch?v=GxGWnuYFccI> .

I believe that there was deep drilling in this 425 area in the 1960s by Summa Corp and Conoco for porphyry molybdenum deposits. Summa Corp/Tenneco was the original owner of the Camp Douglas Patents traded with the Pauley Family for ground at Manhattan. There may be additional drilled resources of these elements at Silver Dyke- including perhaps 100,000 oz Au. I also drilled an NOI BLM project in the north Marietta area (Roy Ladd ground) in 1988-89 with some good Au-Ag intercepts. There are perhaps 400-500 total exploration drill holes and resources of 1/3 to 1/2 million oz of Gold in the Excelsior Range.

The geology & mineral potential of much of the Excelsior Range has been evaluated by Dr. L.J. Garside of the NV Bur of Mines and Geology (1979, 1982, 1986 plus open-file in Reno)- refs at end of these comments. I'm not that familiar with the far western/NW part of the proposed LWC but it does have mineral potential according to Garside and others. Drill results prove this mineral potential for the whole Excelsior Range. I do remember there was extensive local wood-cutting in the western/NW part of the Excelsiors but do not know where these BLM preferred wood cutting areas were/are. One has to go to a local BLM office to buy a Permit first. Locals often pay no attention to BLM permits or preferred areas.

From the 6+ years I worked in the Excelsior Mountains I do not think I saw a single recreational hiker, backpacker, casual camper, or horseback rider. Many cowboys ride ATVs besides horses these days. A few geologists, collectors of ghost town artifacts (metal detectors) and arrowheads, ATV riders, a few hunters- mostly bird hunters and some local wood cutters were noted in the range- usually much less than a mile from their vehicle. Hunters in pick-up campers sometimes camped overnight (fire rings). Also some denizens of Marietta- landowners or swatters living in shacks amongst considerable trash & junk also drive into the range- mostly for hunting and woodcutting. The Excelsiors are a prime woodcutting area, permitted or not, for those living in the Mina, Luning and Hawthorne area and often advertised by the BLM. Much of the area was logged-off in the late 19th & early 20th centuries for mine timbers and firewood- some for the T&G Railroad thru Mina. There is lots of second-growth pinyon-juniper, sage and a few grassy high, wind-swept plains. Except for a few (2-3) springs at the base of the range there is no water which limits wildlife and people. I saw no bighorn sheep but there are plenty of coyotes. A few 100 wild horses and burros are present but they seldom get very far from water sources: springs or dirt tanks built & maintained by Sweetwater (Hilton) Ranch or perhaps the BLM. There is also at least one wildlife guzzler put in by NDOW/BLM in the range, apparently installed by NDOW, to promote desert big horn sheep recent transplanted into the range (see ref below). How will they be accessed for repair if this area is closed to vehicle travel? Access will be much more difficult for wildland fire crews.

The "unusual" geologic features mentioned in the Unit descriptions (& FNW promotions) include altered, bleached and iron-oxide stained rock- all indicative of mineralization. Varicolored rocky outcrops can be found all over Nevada. The range-front geology of the Excelsiors is impressive- at least when viewed from the south on US95, again in part due to low-angle faulting and iron oxides from mineralization. The area does have historic borate production (which should not be a LWC positive criterion) on the playas to the south- and also has potential for lithium deposits mentioned above. There is present heavy exploration for copper (NOI permits) in Little Huntoon Valley a few miles SW of this LWC study area (<http://www.greatwesternmining.com/projects-operations>). The skies can be very dark for astronomy and the mountains windy, not unusual in most of rural Nevada- not just LWC. Scenic views of desert and mountains from ridge lines to outside the nominated LWC, especially at sunset, are not indications of LWC-such views can be found throughout Nevada.

I'm not sure of the present status of the Garfield Flat Bombing Range (Ordnance Impact Testing Area) 2-3 miles north of the Unit 425 area. Back when I worked at Camp Douglas there was monthly or by-monthly testing of cluster bombs, dropped from jets. There was also testing of 20 & 40mm cannon fire from these jets on targets. During these noisy tests Day & Zimmermann security personnel from Hawthorne Army Ammo Plant closed access roads off, flew the ranges & playas with helicopters looking for people or wild horses within 5-10 miles of the still-fenced target site. Closures often continued for several days while bomb fragments were cleaned up and studied. Besides the noise this would not contribute to a Wilderness experience, but was certainly spectacular at times. In addition I suspect this area was a bombing and gunnery range during WW2 & Korea. Our personnel found practice (unarmed) bombs and live, 4-5" rockets SW of Camp Douglas in the main Excelsiors, which were removed by Fallon

NAS/HWAAP teams. There are large-caliber military cartridge casings dating from the 1940s. Other hazards include unfenced shafts and open tunnels- old mine workings. The area is often over flown every few hours by heavy jet traffic- and sometimes helicopters, sometimes at very low levels. I can also remember looking down onto Navy jets flying within canyons from roads in the upper part of the Excelsiors: Again not conducive to “solitude.”

Some 8 miles west of the west end of the North Excelsior Unit is a 3000 acre Ordinance Disposal Area, just off NV highway 359- part of HWAAP- code named “New Bomb” where old/excess munitions are burned or detonated regularly, especially during preferred winds from the west away from the town of Hawthorne. Blasts sounds, echos & fumes often easily reach the Excelsiors. On occasion there were HWAAP contractor monitoring teams in Garfield Flat or on the higher roads in the Excelsiors or Forest Rd. 200 off on the west end of the Excelsior North Unit during this munition detonation.

(http://ndep.nv.gov/docs_04/hwad072005_f.pdf) This blasting may be confused with sonic booms- not uncommon in the region. Other environmental problems associated with the Hawthorne Army Depot that might affect BLM lands around Hawthorne are covered in the following report. There is little discussion of military use/ hazards in the whole RMP set of reports.
<http://aec.army.mil/Portals/3/IAP/NV-Hawthorne.pdf>

There are 3 NV state - designated water reservoirs in the Garfield Flat area, filled from wells and run-off from the playa that provide water for wild horses, range cattle and wildlife. It could not be easily or safely consumed by humans without considerable treatment. One can easily see hoof-prints on many of the roads around the range- often to springs or these dirt tanks. It is not just vehicles that keep open these road tracks.

An evaluation of Garfield Flat and other playas in the area for geothermal potential follows. LWC designations may curtail permitting for geothermal development in these areas/which apparently are scheduled to be removed from geothermal leasing under Option C & E LWC proposals. :

http://www.atlasgeoinc.com/wp-content/uploads/2012/Publications/Nevada/GarfieldFlat_GeothermalPotential_FinalReport.pdf

In summary Unit NV-030-425 needs to be re-evaluated and better documented for the public, nominated LWC acreage reduced or eliminated to avoid patented ground, well used roads & trails, wood cutting areas, access to inholding patents, mine workings and unpatented claims, especially for several miles SW from Silver Dyke and north of the mines/claims on or west of Moho Mountain, to well-avoid unacceptable Unit 425a.

Excelsior South (NV-030-430) aka Teel’s Marsh-Basalt.

The Unit Description is very confusing because the map & discussed subunits are not clear. There is a long discussion of past land transfers with the USFS- some of which lands had Rare II designation. Teels Marsh proper has apparently been removed from this combined unit since 1980. This playa has high borate, lithium potential and geothermal potential (active lease) and 269 recently staked placer claims (see above Lithium Discussion). Part of the Eastside mine area has been excised from the LWC Unit and apparently 140 acres around the inholding Norquez Mine has been removed both for disturbance but not shown as removed on the Unit map/photo. I believe there are several recent NDOW Guzzlers (NDOW EA Permitting) installed in the Nominated Unit. The Rock House Spring area in the northern part of the Unit has strong argillic (clay) alteration and silification over several sq. miles with local anomalous Au, when sampled in 1989. The Basalt area includes some of the most desolate county in NV but is not

attractive, except to decorative stone dealers. Basalt flows, craters and “malpais” are present throughout this region & show on BLM & USFS maps. Apparently “Desolation” is the New BLM or at least FNW indicator of “diverse solitude.” Most recreation in this area is by 4WD or ATV but is hard on tires. There is often high military use of the air space in and around this unit.

The Candelaria mining district is centered just over 10 miles to the NE of this nominated LWC and has produced about 70 million oz of silver and significant gold from 1864-1999 with a remaining resource of about 120 million oz Ag- largely on patented ground and active exploration by Silver Standard. Outlying regions are covered with unpatented claims. The mineral potential of this area alone makes it unacceptable for a LWV Unit.

Chukar Ridge (NV-030-405) aka Wildhorse Canyon. This area, apparently unacceptable as a WSA in the past was split into 2 or 3 areas, again not fully delineated & labeled in the detailed Unit descriptions maps, aerial photos to excise some heavily disturbed areas. I’ve not been thru much of this area since the early 1990s. This area in the NW-trending Gabbs Valley Range has heavy argillic, silicic alteration (USGS map MF-1382-Q) and iron oxides after pyrite both NW and SE of heavily explored Wildhorse Canyon, past small mine production (~\$400,000 Au +Ag), active unpatented claims, recent drilling. There are numerous old workings, trenches, discovery pits visible on Google Earth. There are also amalgamation (Mercury-processed) tailings in the area that I doubt have been removed or reclaimed. The Rand-Bovard mining District was heavily explored 10-30 years ago and a number of RC & core holes drilled by Gold Standard, Lac, Centera & others. Unpatented claims may still be owned by Nevada Eagle or Frontier/Newmont. (I suspect you will hear from Newmont.) Most of this mining/exploration was in the northern portion boundary but there was considerable claim & drilling activity to the north of Win Wan Flat in recent past years. I’ve not checked the full extent of claims. http://westernmininghistory.com/mine_detail/10310399. In spite of reclamation exploration/mining work is still evident. Older excavations, junk and trash are considered historic and archeologists would scream if they were reclaimed.

I remember a major power line coming out of the SW portion of Gabbs Valley through this area (along the NE side) plus a microwave tower. The NW portion is desolate with only low scrub vegetation but does have some interesting colorful geology (Blue Sphinx, etc.) The colors often come from alteration minerals or various types of oxidized pyrite mineralization. The SE portion does have some sparse pinyon-juniper, where protected from heavy winds. There is little or no water in the NW portion but some springs during wet seasons near the base of the range in the SE portion of the Unit. There are at least 6 NDOW bird & large ungulate guzzlers in the nominated LWC plus wet-season dirt cattle tanks. I have seen a few hunters, prospectors and weekend-overnight pick-up campers/ghost town/metal detector tourists and partiers around the Blue Sphinx area. Lighted sky from Hawthorne to the SW makes this not the best areas for astronomy. The LWC features are “natural” but can be found many places in the CCD. The Army Ammo Plant/Storage Bunkers are 15-20 miles to the SW. Someone must have a weird definition of solitude to call this area an LWC Unit. Being contiguous to the “unacceptable” Gabbs Valley WSA is not a criterion for LWC. This unit is also next to the Gabbs Valley Central Military Operations Area (MOA/ATCAA) with periodic high-speed aircraft use down to 100 feet above ground level.

Agai Pah Hills (NV-030-402) aka Gillis Range North. This Unit has sharp, straight north and west boundaries as it is contiguous with the Walker River Indian Reservation. Most of the actual Agai Pah Hills are actually on the Reservation. http://westernmininghistory.com/mine_detail/10045442. The Copper

Mountain Skarn Cu property- with little production is at the NE corner of this unit (patented in part?). Some of this mineralization continues NW onto the reservation and into the 402 Unit.

This unit area is heavily cut up by roads, trails, ways, cow-paths used by prospectors, a few bird hunters, cattle, sheep herders, 4WD, ORV enthusiasts who like dust. Flash floods, slope wash and winds often obliterate trails. The BLM evaluators (after turning this area down multiple times) cut this general area up into 16 subunits, again not indicated/labeled on the maps and photos and number some roads- again not indicated. They edited out one area that they somehow thought had LWC.

I've been thru this area a number of times in the early 1990s. The volcanic, pediment and wash geology is somewhat interesting and varicolored but can be found in many areas of Nevada. It is among the most desolate and sparsely vegetated areas in NV- which is why the rocks are visible. There is absolutely no water, except trucked in for grazing sheep in the spring/early summer of a few wet years and a few dirt tanks, filled after flash floods (quick to dry-up). Rain-induced grass is around for maybe 4-6 weeks. During the short grazing season there are multiple herds of 100s or thousands of domestic sheep busy removing this grass with barking shepherd dogs watching them. There are few natural critters but yes there are "birds of prey", like FONW says: http://www.nevadawilderness.org/agai_pah_hills - usually feeding on sheep and a few cattle carcasses. Along with the sheep there are hoards of ticks that hang around for many weeks or months after the sheep leave- just waiting for a human to come by. There are also often intestinal/lung parasitic worm eggs in the sheep pellets/feces that can remain viable for over a year around these dried-up watering places according to local veterinarians. These parasites cause great damage non-resistant to big-horn sheep populations, which may wonder in after rare heavy rains. http://www.bighornsheep.org/article_rmrs_gtr209.pdf

There are a number of historic & modern trash piles with broken bottles and beer cans- probably from Hawthorne-area desert-partying locals & the Peruvian sheep herders who have to camp out here and may agree that there is lonely "Soledad." There are very few visitors off the roads in this area. I'm not sure sheep grazing continues in this area. Considering this desolate area as LWC is a perversion of the term Wilderness. In addition most of this area is within the Gabbs Central Military Operations Area which starts at 100 feet above ground level 7AM to Midnite, up to 7 days a week. Expect multiple low level aircraft operating at high speeds at unexpected times. Again military operations are not conducive to Solitude. Opportunities for ATV use are not superior or outstanding to their kind.

Rawe Peak (NV-030-517) This unit, in the north end of the Pine Nut Range, has been trimmed and cherry-stemmed of non-qualifying and patented areas from the 1980 BLM evaluation into two areas, both of which I believe still have active mining claims. The BLM map and aerial photo are fuzzy, like other unit reports and the mentioned roads are not well-labeled. The new eastern unit also has considerable private inholdings. What about access to this private property? There are two major E-W power lines thru the area, one thru Como and the other just south of Rawe Peak. There is also a communications tower on Rawe Peak Ridge. I've not been in the area since the early 1990s but there were a considerable number of wild horses and I'm told Sage Grouse. There is little vegetation besides wind-swept rocky sage and grasses over much of this area, but some thicker vegetation exists in the draws and valleys and north-facing slopes. There is little water available- except at a few springs that are in exploration-drill tested areas. There are nice views of Carson City, the Sierra Crest, Carson Valley, Virginia-City-Gold Hill, the Carson River Valley along US-50 and the northern Mason Valley-Yerington- all urban, industrial and agricultural- views not particularly a characteristic of wilderness.

The ghost town area of Como at the south central portion of this unit has been heavily explored of its similarities to the Comstock Lode for the last 150 years with minor vein production of >20,000 oz of Au

and 500,000 oz Ag. There have been 100s of drill holes in the last 50 years developing about 40,000 oz of Au resource. Newmont apparently holds claims in the Como area. I am told that there are active planned NOI exploration drilling plans in this area. A recent aerial photo (Google Earth) shows iron-oxide staining, drill roads and pads in several areas around Bull Springs, Barton and Whitman Springs, Hercules (http://www.minquestinc.com/index.php?option=com_k2&view=item&layout=item&id=41&Itemid=180) and other areas. I understand there is at least one current NOI/PoO planned drilling operation in the Hercules area. FNW has been promoting this area for Wilderness for a number of years and held a familiarization/promotional hike to the Unit on March 21, 2015. This is a nice area to visit for a mineral exploration geologist, hunter or peak-bagger hiker but its attributes have been twisted into LWC. It's mineral potential alone disqualifies it as LWC. Again, an area for good views is not a Wilderness Characteristic. I'm not sure of the density of pine nuts but I have seen local native collectors from the Carson Valley in the area years ago.

Lyon Peak (NV-030-520) This unit has been halved in size: edited out from non-LWC areas to the west from the 1980 evaluation. I've only been in the northern part of this area back in the early 1990s. Again the map and photo with the unit description are blurry and the roads & text descriptions cannot easily be followed with labels. The area has considerable private inholdings and at least several previous NOI drill programs for minerals south of Como. There are active mining claims in the northern portion of the area. The Google Earth photo of the area shows considerable dead and mangled vegetation-apparently from "treatments" from 2007-2011 noted in the unit text. From tracks and trails some of this appears to be from heavy commercial logging or "hydro axe" type equipment. A hiker's description: http://www.fedak.net/photos/LyonPeak/lyon_topo-standard.html of a route to Lyon Peak with 54 photos shows this to be the case with considerable smaller new growth, trash, claim posts, but good views from the crest of the range of the developed Carson Valley. There are visible paths thru the wooded areas- probably a relic of grazing or the vegetative treatments. There are local thickets of almost impassible mountain mahogany. There is apparently some spring water available early in the year. There are power lines and roads bounding much of the unit. The area is also infested with large numbers of wild horses according to the descriptions. All of these features detract from the naturalness and solitude of the unit and it is certainly not outstanding. The data from the Citizen Groups provided in the 2013 is not presented in any detail- so really cannot be evaluated. It does not appear to be on the current FNW internet published list. Good views from ridge crests are not necessary outstanding wilderness characteristics- they can be found all around Nevada.

Finger Rock (NV-030-409) aka Stewart Valley Hills This unit adjoins just SE the 1980s-90s Santa Fe open-pit gold-silver Mine (with residual resources) just SE of NV Route 361 and is adjacent/overlaps the Stewart Valley restricted fossil non-collecting area (ACEC) well known for its Miocene fauna & flora, particularly insects in paper-thin, lacustrine ashy shales. This ACEC designation, however, just highlights it to fossil private & commercial collectors. The area is open, desolate and bare of most vegetation above waist-height with grasses for grazing only in the wetter parts of the year. The higher areas have thinly scattered small trees on selected, more shaded slopes. At times there is ATV and jeep traffic in these hills and dry washes, some by cattle ranchers, other by ATV recreationists. There is nil water except during the monsoon season- which promotes the growth of grass for grazing. The rock & soil is soft and after a few years tracks and trails erode, mostly by wind, and disappear. This area was visited during the Oct 2013 NPGS Field Trip- reference below.

A major power line from Luning to Gabbs crosses the area. The white-painted Mina VORTAC FAA/DOD aerial navigation aide (pylon) & hut with access road & power line is on Muller Mountain just SW of the area. At times there is heavy, noisy and sometimes low-level military (down to 100 feet above ground

level) and civilian air traffic thru this area. This area is part of the FAA-designated often noisy Gabbs Central & Southern Military Operation Areas. FAA/DOD Aeronautical Maps- Sectional Charts at 1:500,000 Scale (San Francisco Sheet) show these aerial routes, topography culture and potential obstructions such as power lines in many of the proposed LWC areas. The detail in the Unit description, again, is a little confusing because the roads & sub-areas mentioned are not delineated on the map & air photo provided

The more mountainous part of the Gabbs Valley range to the SW of the unit is laced with roads, some mines and numerous mining claims. This contiguous area also includes the New York Canyon porphyry copper-molybdenum deposit now held by Falcon Gold (<http://www.falcongold.ca/s/home.asp>) with production of 9 million pounds of Cu and 160 million pounds Cu resources. Just NW of the Santa Fe mine is the proposed, undeveloped, under-permitting Isabella-Pearl Gold-Silver Deposit (http://westernmininghistory.com/mine_detail/10310573) (http://www.blm.gov/nv/st/en/fo/carson_city_field/blm_information/nepa/isabella_pearl_llc.html) on the range front/pediment with resources of over 400,000 oz of Au. From the higher portions of the NW portion of the unit the extensive mine workings of the Paradise Peak and County Line area Au deposits are visible. The SW facing range front of the Gabbs Valley Range is impressive but is not part of the nominated LWC. Much of this area is natural and is of interest to paleontologists but it is hardly an area of superior solitude. The proposed ACEC does provide some regulation to the valley areas. It is a mystery why new 2014 information by Outside Groups” suddenly makes this outstanding LWC except for its desolation and nearby ACEC.

Monte Cristo North. Indicated on Fig 2-19 (A-19) “Alternative C: LMMWC” but extends into Esmeralda County and another BLM District- Battle Mtn. There is no mention in the CCD Detailed Unit Description and the area has apparently no CCD number or listed in the LWC Report. Apparently the area will be covered in the BMD- RMP Report when it is out within several years. This area in the Redlich Summit-Rock Hill area of US95 is on the eastern outskirts of the Candelaria Mining District and has been drilled multiple times over the last 40 years- as recently as 5 years ago. The lower elevation area is open and windswept with little vegetation over waist height. Areas both E and W of US 95 are laced with drill roads and trails, partially reclaimed but still very visible- after 40 years. The abandoned grade of the Railroad to Tonopah & Goldfield extends thru this area with associated historic artifacts and junk. There is also considerable windblown trash & junk from US-395. There are a few NDOT gravel pits- often some miles from the US95 ROW. The area is described on the FNW Website mostly on its geology and barren, empty desolate landscape. The geology is multicolored volcanic ash & lava flows with alluvial fans, possibly spectacular to some but routine for this whole region from Hawthorne to Beatty. Some of the colors are due to alteration/mineralization. I’ve spent many months all over the Monte Cristo Range and it cannot be considered wilderness unless barren desert is wilderness. There is no water except during monsoonal flash-floods and a few rare springs. Some grass and flowers spring up for a few weeks after rains. Desert critters are sparse but there are some wild horses. There are considerable past and present mining claims over portions of this area. Again there is little of Outstanding, Superior LWC in this area that cannot be found in much of central & northwest Nevada. Interesting scenery is not Wilderness.

I’m not that familiar with the **4 other LWC nominated units** north of US-50 & I-80. Again some of these areas have changed names/consolidated from Table C of the LWC Report and alternatives C & E – Fig 2-9 & 10 of Chap 1. The photos and maps of the subunits are unclear & the roads discussed are unlabeled in the Reports. Unacceptable areas have been edited out by trimming and cherry-stemming- some extreme.

The LWC designated areas have changed from “non superior features that are found throughout the CCDO” to areas with “diversity of topography and relief” and “incredible expanses of solitude”. “Opportunities for hunting, hiking, rock-hounding, camping, wildlife-viewing, dark skies (astronomy) and photography” which are found throughout much of the CCDO are now, on the basis of “new outside information” suddenly Superior Attributes for LWC because “BLM guidelines have changed from 1980” & later to 2014. Nowhere in these CCDO reports are the exact Changed BLM Guidelines defined. Lack of previously necessary topographic or vegetative screening for short-range solitude to expansiveness is the only change of guideline I can note. Also perhaps the concept that disturbed previously unacceptable areas can become LWC with time and “healing.” Erosion by wind (such as at heavily trafficked Sand Mtn.) and water/flash floods do heal tracks and trails.

I’m surprised that Alkali Flat (NV-030-201) in western Gabbs Valley was not nominated for LWC by these outside groups because it is natural and has incredible expanses of solitude, interesting if flat topography, a little dusty and very little pesky vegetation to obscure outstanding views. Of course it is infested with geothermal leases, hot springs, and power plant & multiple power lines, roads and causeways, old waterlines, corrals, a major mine in the NW portion, a mercury mine in the SE portion, old placer & mill site workings and interesting trash. Plus lots of arrowheads and potshards are present around Paleo-Indian village ruins on the shady shorelines of an evaporated Pleistocene lake. Low passes from pilots from Fallon NAS in the Gabbs Central MOA add to its excitement. Nevertheless there are occasional trailer campers, often geothermal construction workers/miners in the unit enjoying the solitude. There is much more use of this very desolate area than any of the nominated LWC.

In summary, mineral resources including petroleum and geothermal are necessary for our nation’s well-being. Exploration and mining are cyclic depending on metal prices and costs primarily fuel/energy. Government regulations and permitting- often stretching for tens of years- with required environmental studies contribute to delays and this cyclicity. The mining boom in the 1980s-90s in the CCD, which provided 100s of jobs for locals as well as Native Americans started with the discovery of Paradise Peak and reopening of old districts at Rawhide and Borealis/Aurora. Extensive exploration and development of new mineral resources has lead to the reopening of the south end of the Comstock Lode at Gold Hill. Extensive copper deposits, mostly at least partially delineated for decades are leading to a re-opening for the Yerington District. There are a number of well-delineated Au-Ag deposits waiting higher metal prices, development money and permitting delays before going into production. These deposits will provide jobs for the locals including Native Americans- a matter of “Environmental Justice.”

This new concept of LWC appears to be trying to get around the intent of Congress in limiting new Wilderness Areas by changing BLM Evaluation Manuals. Last year’s NDOT Official Highway Map lists 62 Wilderness areas (not including WSAs) in NV. Apparently the number of NV Wilderness areas managed by 4 federal agencies now total 70. There are 140 Wilderness areas in California- most much more inviting than these newly nominated NV LWC de facto wilderness areas. There are 66 WSAs in NV. In the CCD only 18% of the acreage in these CCDO WSAs was acceptable for wilderness when evaluated (p. 3-199; Table 3-42). I suspect that this 18% would increase if re-evaluated today based on the BLM poorly specified “New Criteria.” Most of these nominated LWC Units lack water, trails and features that would attract non-mechanized wilderness users. I do not understand how they could be classified as superior or outstanding as compared to other areas in the region.

I am concerned that while evaluated, if poorly, mineral potential/mining claims in the CCD were not investigated within each of these proposed LWC designations. One reason they “may never be developed” are all the added government restrictions including NEPA. I am also concerned that NGOs-

especially FNW seem to have a too cozy relationship with the BLM and other Federal Regulators. They receive grants and awards from the BLM but do considerable volunteer work on BLM lands- apparently BLM approved: removing old fencing, pulling weeds, collecting trash, maintaining trails but blocking and “naturalizing” old roads (See FONW Website.) Several of their paid officers & directors are ex-BLM “wilderness” employees. FONW appears to be a large part of the RMP scoping process and were actively involved with the BLM and their Contractors on this LWC Project at least from mid-2013 before this LWC was released to the public just before Thanksgiving and Christmas 2014 with little significant notice until Jan 2015. Stakeholders- who “rent” from the BLM – owners of mining claims, geothermal and petroleum leases were not notified, and not even considered a “Special Interest Group.” According to ranchers I’ve talked to there was no contact about the RMP from the BLM concerning LWC, grazing, ATVs, new road restrictions or other issues beyond the normal communications with allotment holders.

I’m concerned that all of these LWC areas are proposed to be closed to Fluid Mineral and other leasing (Fig 2-32, A-32) - although geothermal and petroleum exploration in NV has initially been confined to basins. Although not stated, the “closed to mineral leasing option”, means that unpatented mining claims and their resources will also be essentially invalidated and locked up in practice- there is no disclaimer of this. I’m concerned that huge areas (Fig. 2-64, A-64) are proposed to be closed to motorized travel or limited to existing routes. The ancillary designation for mechanized/no motorized travel must be for the benefit of bicyclists, wheel-chair and wheelbarrow users. If there is no access, mineral and other resources (fuel wood for example) cannot be developed. See the NPGS Report below for recent Petroleum Developments in the CCD.

Finally I’m concerned that these LWC, once designated will be treated exactly like Wilderness areas or WSAs in spite of their use by, at most, a few hundred people per year beyond current motorized users. Various NGOs promise to “hold the BLM Accountable” or “hold BLM’s Feet to the Fire” - presumably meaning protests and lawsuits. The various flash mob photos on the FNW, Wilderness Society and Sierra Club Websites attest to this. These users can get the same benefit without the LWC designation right now, but are not attracted to these areas because of poor road/trail access, lack of water, shade, trail systems, signage, etc. compared to previously designated areas- especially in California or the higher alpine mountain ranges in NV. These new nominated LWC areas have few Superior or Outstanding opportunities for Primitive or Unconfined Recreation that cannot be found elsewhere in the CCDO. If say a mine is proposed or a drilling & road Exploration Plan of Operations (even NOI) they will have many years during the permitting process to oppose such “degrading uses” as well as the courts. And as is said: with reclamation, evidence of such uses may disappear with time.

I would suggest that the Draft Mineral Potential Report be rewritten to remove errors, including a full explanation of the past, present and possible future production and its economic consequences- similar to the 2012 Battle Mountain District Report. This is not dealt with fully enough in the SocioEconomic/Environmental Justice Sections. Right now, unless more detailed information and maps are provided for the 12 nominated LWC areas, I’d say they should be placed in the Option A category or “No Change.”

Thank you for the opportunity to comment.

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Exploration Geologist

April 7, 2015

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Above two papers in: Garside, L.J., ed., 2013 Nevada Petroleum and Geothermal Society Field Trip Guidebook, NPGS 24, Geothermal and Petroleum Developments of the Central Walker Lane, Nevada, Oct 12-13, 131p. (ISBN-978-1-881-308-39-3) Contains considerable info on petroleum and geothermal resources and development in the region.

Garside, L. J., 1979, Geologic Map of the Camp Douglas Quadrangle , Nevada, NV Bur. Mines and Geol. Map 63, with Explanation, 1:24,000. Longer Report and more detail on open-file at NBMG.

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Additional Note (4/13/15)

Most of the above 14 pages were completed about two weeks ago. I've since discovered 12 items have been added to the BLM CCDO PMP Document Website on 3/27 & 4/06 including the 3/31 Transcript of the 3/19/15 Fallon Public Hearing. These are quite revealing and show that FONW had much more input into the considerations of LWC than the BLM itself did and at least 6-8 months before the general public knew about these LWC proposals.

You will note on the FNW-provided Appendix D Excelsior Log of 40 FNW (7/16-18/2014) Photos and Chukar Ridge 47 FNW (10/1-3/2014) photos (with Goggle Earth contour relief & vertical aerial photos all recorded on an i-Pad with GeoJot, GPS coordinates other metadata) that many photos, taken over 2-3 days for each area (almost all including roads) are off the Proposed LWC outlines, that there is little or no evidence of self reclamation/revegetation in & along the photographed road tracks, and the FNW seldom followed the roads to their ends. These photos, including recent tire-tracks, crushed sage-brush, demonstrate that these roads are still regularly used and have very little if any "self reclamation" - in spite of the claims in the FNW verbiage. The photos show fire-rings, guzzlers, claim posts, drill pads, trash from old mining ventures, woodcutting, etc. and commonly have the notation that "Rehabilitation/Naturalization" should be done on the roads. Many of the scenery shots, including those 8 (10/19/14) by the BLM, show road scars in the distance as well as the well-used roadbed. I have numerous 35 mm color slides of these areas from 1987-93 that show practically the same road use. The

pinyons/junipers have perhaps grown a little since then. Few photos are more than a few hundred feet from a 2WD drivable road. The Nov 1980 Excelsior BLM Intensive Wilderness Inventory Report (99MB) in typescript with color photo mosaics and labeled roads is quite good and demonstrates little self-reclamation in the last 34 years. The 1980 Report also clears up some of the road and boundary considerations. It does clear up some confusion on these items in the Unit Reports on NV-030- 425. Still missing is the BLM 2014 detail on why these should be LWC areas- beside the sketchy Unit Reports including “new criteria”, input from citizen groups. Photo shots including distant ranges in spite of green vegetation in the foreground are not evidence of LWC. Most not motorized recreational opportunities listed are not outstanding and are available at many locations in the CCD. The over-the-top positive verbiage supplied by FONW lacks any consideration of negative factors such as heavy use by 4WD/ORV, heavy, noisy military use or the presence of thousands of mining claims plus drill rigs. Essentially an area is wilderness if FONW says it is. FONW appears to be Wilderness Crusade in spite of the facts.

Here is another reason that Excelsior roads are not self-reclaimed: Periodic use by 4WD/Off Highway Vehicles. There are a number of such photo sets & videos on the internet for example: <http://www.mikestoller.com/Off-Road-Adventure/Excelsior-Mountains-Nevada-May/>

Also note on the photos that the FONW drove a late model, white 4WD Dodge Ram 1500 crew-cab pickup (NV plates 288-YTY) with no dents, scratches or mud. Where are the backpacks and pack-burros they recommend for LWC users? Perhaps they did camp-out as they note that a Chuckar Ridge “drill pad is now a cool campsite.” What a bunch of hypocrites! All the FONW submittals in BLM format should have been made available for the 12 or more units they nominated just like these page will eventually be.

The 8 BLM photos with log, taken on a single day 10/9/14 contain only 2 shots of historic culture and 6 scenery shots just off roads, over a very limited area (from 4 sections) by Mr. Callan and Ms Hornsby, driving a Chevy Truck. How can 54,464 acres of proposed LWC be evaluated from this minimal, < one day road field check? The professional-quality FONW scenery photos by K.A. Peterson (not logged or GeoJot Documented) of FNW- a FONW “Inventory Coordinator”, LWC Advocate and retired NPS Ranger- including 2 of big horn sheep and a burro along with the FNW text were apparently the main impetus to nominate the Excelsior for LWC status. Common wildlife presences are not characteristics of Wilderness. There is no evidence that FNW or the BLM visited any significant off-road portion of the Excelsiors for a field ground-truth check of revegetation or suitability for LWC. (Note: in Nov 2012, 25 Desert Big Horn Sheep were transplanted into the Excelsiors by NDOW. <https://www.wildsheepfoundation.org/Page.php/News/230/1351746000-1354251600>)

Personnel skilled in interpretation of aerial imagery/photos should be able to determine continued use of roads and trails in the Excelsiors and revegetation/migration of vegetation types with time. Since the 1930s USDA (and other government agencies) have stereo aerial photographed all the areas in the CCDO- usually annually, often in color or other spectral wave lengths. I’ve used such older photos several times to prove that recent explorationists did not build specific historic roads. The annual photos often end up on Google Earth or other, often government, websites or can be easily obtained from government repositories. I’m sure such personnel exist in the BLM and may be already tracking changes in vegetation communities as part of Sage Grouse studies using such imagery. This long term, broad-scale, synoptic imagery monitoring is a much better determinant of easily visible roads/2-tracks and vegetation densities than possibly biased photos groups taken at only one time of the year.

In addition FONW, a IRS 501-C non-profit corporation, survives on grant and donations- including government grants which make up about 35% of their income (See their IRS Forms 990 on their website.) The BLM is one of these government grantors to FONW. That makes FONW essentially a Government Contractor besides being a "BLM Partner." Their Roads Reports recommending "Rehabilitation/Naturalization" seem more to be trolling for more BLM monetary Grants than evaluating Wilderness Characteristics. Their goals are clearly stated on Form 990 and their website: Obliterating "illegal or unnecessary vehicle routes", pulling invasive weeds, removing old fencing, replanting native species- all with hand tools and largely young volunteer labor- are futile work in the Nevada desert but make great publicity photos for these young, idealistic people. These RMP Reports should clearly disclose the exact relationship of FONW to the BLM and these reports. Has the BLM relied on FONW to do their evaluation work for them? Who "changed BLM Guidelines since 1980"?- FONW? These "Citizen Proposals" are from a long-term 1984 franchised lobbying/advocacy self-interest Group with a budget of \$700,000+ who had considerable, non-disclosed advance notice of these proposed actions. This is essentially unfair to many other stakeholders and those trying to evaluate these proposals in a few months.

I realize that these are draft reports but they need updated and finalized. The CCDO BLM needed to provide much better early announcements to the Public on the RMP Process. Very few read the Federal Register. The January Workshops were very useful, but crowded, almost unruly and many participants had not had a chance to read and study the several thousand pages of documents beforehand. More Workshops to specifically answer questions by concerned citizens later in the comment period- on a variety of issues- would have been helpful as well as working copies of maps, photos, reports. Wild horses, vehicle use and access, grazing and fairness to Native Americans seem to be the major issues. There was also a sense that BLM personnel were just going thru the motions with these Workshops and Public Hearing. However BLM personnel have been very helpful in providing additional information when requested. FONW should have been available to answer questions, but were conspicuously absent. No doubt you will receive 100s of responses from their members.

FRKoutz.

