



*The Champion of the  
21<sup>st</sup> Century Mining Industry*

201 West Liberty Street Suite 300 Reno, NV 89501  
Tel: 775 829 2121 www.NevadaMining.org

**OFFICERS**

Robert Stepper, Chairman  
Coeur Rochester Mine  
Greg Walker, Chair Elect  
Nevada Gold Mines  
Amanda Hilton, Vice Chair  
KGHM – Robinson Mine

Dana R. Bennett, President

**DIRECTORS**

Trent Anderson  
Graymont Western  
Shana Blakeley  
Alto Gold, Inc.  
Andy Britton  
Fiore Gold Pan Mine  
MaryKaye Cashman  
Cashman Equipment  
Amanda Christensen  
Sandvik Mining and Rock  
Technology  
David Copley  
EP Minerals  
Steve Cochrane  
Cyanco  
Rebecca Darling  
Nevada Gold Mines  
Alex Deeds  
American Mining &  
Tunneling  
Mary Beth Donnelly  
Newmont  
Brian Dowd  
Granite Construction  
Tim Dyhr  
Nevada Copper  
Christina Erling  
Barrick  
Greg Gibson  
SSR Mining – Marigold  
Randy Griffin  
Lhoist North America  
Annie Huhta  
University of Nevada, Reno  
Jeff Jenkins  
Franco-Nevada  
Neil Jensen  
Kinross Gold  
Michael Lefenfeld  
Cyanco  
Jack McMahon  
Elko Mining Group  
Randy Miller  
Broadbent & Associates  
Karen Narwold  
Albemarle Corporation  
Colt Nelson  
Hecla Mining Company  
Ron Parratt  
Renaissance Exploration  
Tony Sanchez  
NV Energy  
Randy Shefman  
Royal Gold  
William Hofer  
Jerritt Canyon Gold  
Alexi Zawadzki  
Lithium Nevada Corporation

January 14, 2020

Mr. Dylan Shaver  
Deputy Chief of Staff  
City of Reno  
1 E. 1<sup>st</sup> Street  
Reno, Nevada 89501

RE: Exploration and Mining Comments Concerning Proposed Federal Land  
Transfers, Washoe County, Nevada

Dear Mr. Shaver:

Thank you for opening a dialog with the exploration and mining communities concerning the latest round of proposed federal land transfers and designations within Washoe County. We appreciate the opportunity to provide to Reno, Sparks and Washoe County (Cities/County) the positions of exploration and mining. The ability to conduct mineral exploration and extraction in Nevada is critical to our industry, Nevada's economy, and the security of our nation.

We strongly believe in the multiple use doctrine for the management of our public lands which allows for a mix of land uses best suited for the good of the public. This doctrine has served Nevada and Nevadans well for more than 40 years. It allows the public to have access to the land without binding future generations to one specific use. The doctrine gives Nevadans flexibility in the present and the future to use public lands for all manner of uses like hiking, biking, hunting, ranching, and mineral exploration and extraction.

Land withdrawals curtail the multiple use doctrine by restricting the land from entry for one or more specific uses. Some withdrawals prohibit the use of motorized vehicles; others, the use of vehicles of any sort. Other withdrawals may prohibit one from engaging in mineral exploration, extraction, or any commercial purpose at all.

We recognize that there are valid reasons to withdraw certain lands from multiple use: to protect or preserve habitat, to conserve culturally significant or environmentally sensitive areas, or to protect endangered species.

We believe that changes in current land classification through the Cities/County process must be thoroughly evaluated in a transparent way, be well-reasoned, be well-studied, and the current and future costs and impacts of land use decisions thoroughly understood.

Prohibiting mineral exploration, mine development, or extraction on public lands will have a negative effect on the industry today, will have consequences well into the future, and will likely hinder the broader economy for generations to come. It takes thousands of mine claims, years of exploration, and millions or even billions of dollars of investment before a mine is even open. Once a mine is determined to be feasible, it may take a decade or more to go through the circuitous federal, state and local permitting. During that process, there are numerous opportunities for scientific evaluation and public input as the land manager determines the best course for balancing multiple uses, but only if those lands are not saddled with undue and inappropriate use restrictions.

Land withdrawals, especially in mineralized areas, limit exploration opportunities and access to capital for explorers. They have the potential to reduce or eliminate the availability of minerals our future will depend on. To make matters worse, without exploration we cannot know with any certainty whether these minerals are present. Much of what we already know about Nevada's geology and geography can be attributed to mineral exploration, yet there is much still to learn.

Nevada is one of the richest states in mineral wealth, yet today more than one-third of Nevada's land is inaccessible to mineral exploration. In 2015 and 2016, land withdrawals removed more than one million acres from the map for the mining industry. Today, various county lands bills, combined with the potential expansion of NAS Fallon, have placed an additional 1.5 million acres on the block for withdrawal – about 3.5% of the remaining lands available.

We are very concerned with any proposal that further restricts or eliminates the ability to explore and mine on public lands.

## **Background**

The Nevada Mineral Exploration Coalition (NMEC) is a non-profit, nonpartisan organization dedicated to protecting the public's right to explore for minerals on public lands. We are also advocates of the concept of multiple use of public lands.

The Nevada Mining Association (NvMA) was first organized in 1913 and consists of more than 500 companies that comprise Nevada's mining industry and rely, in whole or in part, on this state's foundational industry. These member companies are engaged across the broad spectrum of the industry in Nevada, from exploration and discovery, to development and construction, to operation and production, to closure and reclamation. NvMA provides a voice for Nevada's mining industry in federal, state, and local policy matters, community engagement, public education, and workforce development. The Nevada Mining Association has been headquartered in Reno since 1913. During the past 107 years, mining has participated in, benefited from, and often fueled the economic growth of Nevada.

The exploration and mining industries have been integral parts of Washoe County's social and economic fabric since 1860 and continues—as 21<sup>st</sup> century, high-tech industries—to be important sectors for Washoe County.



## Comments of General Consideration

NMEC and the NvMA recognize that the process of securing special interest, industry and public comments on a land transfer proposal has started anew with joint management by the City of Reno, the City of Sparks, and Washoe County. We appreciate the criteria (i.e. qualified, appropriate, responsible and manageable) established by the entities as guiding principles for the evaluation of Wilderness Study Areas and any new wilderness.

Following are general considerations we have jointly established with regard to any land transfer proposals considered by the Cities/County:

- Exploration and mining are opposed to any proposal that removes public lands from the opportunity to explore for minerals or extract those resources.
- Exploration and mining must be recognized and designated as stakeholders in the process of determining land use criteria and transfers.
- Exploration for, and on the ground evaluations of, mineral resources have not been conducted in many areas of Washoe County due to land use restrictions. The lack of identification of the presence of mineral resources in an area does not mean they are not there. Furthermore, an emerging concern for national security is rare earth and strategic minerals. The ability to explore for the presence of these important minerals must be preserved to the greatest extent possible.
- The economic viability of a mineral find is time dependent on commodity prices. In other words, a deposit not economically viable today may become viable in the future. An excellent example of this is lithium, where just a decade ago the price and demand for the mineral was modest. Today, Nevada is experiencing a "lithium boom" with large areas of the state being evaluated for its presence.
- Any areas being considered for new wilderness must be fully evaluated in a transparent process (including a NEPA analysis and with consideration of the requirements of the Federal Land Management Policy Act (FLPMA) and Congress) before it is so designated.
- NMEC and the NvMA have not had the opportunity to evaluate the most recent land use designation maps generated by the Cities/County. We reserve the right to provide additional comments when those maps are provided to us.
- Each Wilderness Study Area was evaluated in the 1980's and 1990's culminating in a Record Of Decision (ROD) on the suitability of those lands as wilderness. We strongly believe the 1991 Wilderness Study Area ROD and subsequent information gathered by the federal land managers is still valid and must be considered by the Cities/County in crafting any land transfer proposal.

- Existing historical mining districts and areas for potential clean energy projects (solar, wind and geothermal) need to be identified, recognized and made available to those land uses.
- Any areas identified as potential National Conservation Areas (NCA), or Areas of Critical Environmental Concern (ACEC) must be fully and transparently evaluated for such designation and be minimally sized to protect only the values of concern.
- RS 2477 designated roads must be considered as to their impacts in existing WSA's (suitability and qualification) and in any proposed new wilderness areas.
- As this process moves forward, all information from all interested parties who provided map information and narratives must be made publicly available in an open and transparent process.

### **Specific Comments by Area**

Following are specific comments by the NMEC and the NvMA on each WSA and its wilderness characteristics, mineral potential and a recommendation for action within the Cities/County process.

Please note that there is a lack of consistency between BLM's WSA designations and the Cities/County map nomenclature (i.e. WSA names). In the absence of our ability to obtain the most recent Cities/County maps, the following are referred to by their WSA identification numbers contained in the 1991 ROD. Finally, a significant amount of the use information referenced below are from the 1991 ROD and information subsequently provided by the BLM. We strongly believe this information is still valid. The population of western Nevada has grown significantly (population of Reno in 1991: 150,000; population in 2020: 250,000) in the last few decades and along with it more users of public lands. Consequently, these data are conservative and underrepresent current land usage but are highly indicative of the wilderness characteristics present.

**Dry Valley Rim CA-020-615** (31,505 acres non-suitable and 44,560 acres suitable)

#### Non-Suitable Characteristics:

- The Sierra Army depot is located only 2 miles southwest of the WSA. Ongoing Department of Defense activities at the depot adversely affect the wilderness characteristics of the area.
- Six miles of cherry-stem roads and 47 miles of ways also adversely affect the wilderness characteristics of the area.
- Hunting use in the area is estimated at 3,600 visitor days per year by the BLM.
- OHV use is estimated at 400 visitor days per year by the BLM.
- The Sheephead mining district is located inside and along the eastern edge of the area. A perlite deposit located in Section 25, T29N, R18E is reported by the BLM. They note that additional clay may be present inside the WSA boundaries.



- The BLM reports in its assessment of the area that 17,400 acres in the southern portion of the WSA has geothermal potential. The Wendel Known Geothermal Resource Area (KGRA) is located only 15 miles east of the WSA.

Recommendation:

- Wilderness designation is not appropriate or manageable for a portion of this WSA, and it does not meet the “qualified” criteria outlined by the Cities/County. We recommend the release of 31,505 acres to multiple use.
- The remaining 44,560 acres are deemed suitable by the BLM. Our recommendation is that these acres could be considered for wilderness pending the input of other land users.

**Fox Range WSA NV-020-014 (75,404 acres non-suitable and 0 acres suitable)**

Non-Suitable Characteristics:

- Manmade imprints in the area include: 8.5 miles of roads and 18.4 miles of ways. Six developed springs, one reservoir and one fence are also present. The Western Pacific Railroad runs along the northern and western boundaries of the area and is both visible and audible from areas within the WSA detracting from its wilderness characteristics.
- There are no unique recreational draws within this study area.
- 13,000 acres of this area are accessible to off-road vehicles which will create manageability issues.
- The area has had geothermal as well as oil and gas leases. There are also 400 acres of private inholdings. Development of these parcels is not consistent with wilderness designation for this area.
- The Cottonwood Mining District covers the entire WSA. The BLM reported in the 1991 Wilderness Report and 2001 Wilderness Notebook that 9,800 acres rated high for metallic mineral potential and 25,600 acres rated moderate. 14,000 acres rated high for geothermal potential and 11,800 acres rated moderate.

Recommendation:

- Wilderness designation is not appropriate or manageable for this WSA and it does not meet the “qualified” criteria outlined by the Cities/County. We recommend the release all 75,404 acres to multiple use. In this WSA the mineral potential outweighs the wilderness resources.

**Massacre Rim WSA CA-020-1013 (78,825 acres non-suitable and 22,465 acres suitable)**

Non-Suitable Characteristics:

- The Lone Pine Mining District (gold, silver and mercury) is located along the northern boundary of this WSA. The U.S. Geological Survey found the area to have moderate potential for the discovery of significant mineral deposits. Our study of satellite imagery show significant color anomalies (bleaching and iron oxides) that may correlate with areas of hydrothermal alteration. These areas are present along the

northern boundary of the WSA and continue to the south under post-mineral basalt cover.

- Favorable settings for deposits of lithium exist along the northwest and south-central parts of the WSA.
- The western two-thirds of the WSA have numerous man-made incursions consisting of dirt roads, stock ponds and fences. Ranching/grazing uses will continue to impact the area detracting from a natural character. Maintenance of stock ponds and fences will continue to impact the area.
- Opportunities for solitude are limited due to the gentle terrain and sparse and low vegetation.
- The area does not have outstanding opportunities for primitive and unconfined recreation due to the lack of resources used by hikers and campers. There are no distinctive topography or vegetation features and no dependable water.
- The western and southern parts of this area will be difficult to manage due to the dense two track road network and the open rolling terrain. It is likely that vehicles will travel cross-country in this area and is not preventable.

Recommendation:

- Wilderness designation is not appropriate or manageable for a portion of this WSA and it does not contain and does not meet the “qualified” criteria outlined by the Cities/County. We recommend 78,825 acres be released for multiple use. The remaining 22,465 acres deemed suitable by the BLM could be considered for wilderness designation pending the input and concerns of other land users, especially those with grazing allotments in the area.

**Pole Creek NV-020-014A** (12,969 acres non-suitable and 0 acres suitable)

Non-Suitable Characteristics:

- The BLM stated in its 2001 Wilderness Study Handbook that 3,400 acres of the area are rated high for metallic mineral potential, and 9,569 acres are rated moderate.
- 3,700 acres are rated moderate for geothermal potential.
- Manmade imprints on the area include seven miles of fence, two vehicle ways totaling 2.4 miles, and two developed springs.
- Railroad tracks run along the western boundary and are visible and audible from within the WSA.
- The area is in a military flyway which impacts solitude.
- Grandfathered mining claims bordering the area along Pole Creek could be developed which would affect the wilderness characteristics of the area.
- Vehicle ways allow for easy accessibility for OHV use and will negatively impact manageability.

Recommendation:

- Wilderness designation is not appropriate or manageable for this WSA and does not meet the “qualified” criteria of the Cities/County. The mineral potential of the area outweighs the wilderness resources. We recommend release all 12,969 acres to multiple use.



**Poodle Mountain WSA NV-020-012 (142,050 acres non-suitable and 0 acres suitable)**

Non-Suitable Characteristics:

- Our studies of satellite imagery show significant color anomalies on the east side of the area. The bleaching and iron staining may correlate with areas of hydrothermal alteration which is associated with mineral deposits.
- Significant man-made improvements largely related to ranching and grazing activities detract from the wilderness characteristics of the area.
- 14 developed springs, 23 reservoirs, six fences (27 miles), a pipeline, water trough and two corrals were identified during the BLM inventory of the area.
- 63 ways totaling 76.9 miles of roadway crosscut and provide access to the area for ranching, hunting, and OHV use.
- Opportunities for solitude are negatively impacted due to the main north-south road that cuts into the interior of the area. Military training routes are also present over the area and will negatively impact wilderness characteristics.
- Manageability of the area will be difficult due to the main access road and 76.9 miles of ways providing easy accessibility for OHV's

Recommendation:

- Wilderness designation is not appropriate or manageable for this WSA, and it does not meet the Cities/County "Qualified" criteria. Range improvements related to ranching/grazing activities have impacted the area to such a degree that it no longer has wilderness characteristics. The area will also be difficult to manage due to the extensive road network which must remain in place to allow access for ranching, hunting and OHV use. We recommend release all 142,050 acres to multiple use.

**Granite-Banjo Proposed Wilderness (38,044 acres non-suitable and 0 acres suitable)**

Non-Suitable Characteristics:

- This area is designated as Lands with Wilderness Characteristics (LWC) by the BLM but is not a WSA. The area has not been studied and evaluated through the process outlined in the 1964 Wilderness Act as required by the Cities/County criteria.
- The proposed wilderness overlaps the southern portion of the Deep Hole Mining District. In their 1985 mineral inventory, Bonham, Garside, and others reported on The Mountain View Mine, Silver Bell Mine, Mountain View Tungsten Prospect, Copper King Prospect and Cottonwood Creek Prospects – all in the Deephole Mining District. Deposits in the area are of the contact metamorphic type; this type of deposit forms at the boundary between the granodiorite intrusive rocks and the surrounding country rock. This contact zone must be preserved for future exploration and development.

Recommendation:

- This area should not be designated as Wilderness. The area has never been a WSA and has not gone through the appropriate scientific and administrative evaluation processes.

The area also overlaps a significant mining district and would limit or curtail economic development of projects in this region.

**Selenite Mountains WSA NV-020-200** (1,322 acres non-suitable and 0 acres suitable)

Non-Suitable Characteristics:

- The BLM 2001 Wilderness Study Notebook reports 25% of this area has moderate and 25% of this area has high geothermal values.
- The BLM handbook also states that 40% of the area has moderate mineral values.
- The significant outside sights and sounds of an active gypsum mine affect the area, detracting from its wilderness characteristics.
- The area does not meet the minimum acreage threshold for a wilderness area (5,000 acres).

Recommendation:

- We recommend the release all 1,322 acres to multiple use. This area does not meet the criteria for size for a Wilderness Area (5,000 acres), nor does it contain minimal human imprint. Consequently, the area does not meet the “qualified” criteria outlined by the Cities/County.

**Sheldon Contiguous WSA CA-020-1012** (22,952 acres non-suitable and 748 acres suitable)

Non-Suitable Characteristics:

- Studies of the area by the U.S. Geological Survey and the U.S. Bureau of Mines suggest that the area may contain concealed mineral deposits. Flat lying basalt flows in the area may be covering mineral deposits. Advancements in exploration technology may lead to new discoveries in the area. There is potential for lithium deposits along the northwest edge of the WSA as well.
- The area is primarily used for ranching/grazing, hunting and OHV travel. As such, many two track dirt roads and stock ponds crosscut and dot the landscape, detracting from the naturalness of the area.
- Opportunities for solitude are limited due to the gentle terrain and sparse, low vegetation.
- The area does not have outstanding opportunities for primitive and unconfined recreation due to the lack of resources used by primitive hikers and campers. There is no distinctive topography or vegetational features, and no dependable water.
- The area will be difficult to manage due to the open rolling terrain. Cross-country travel in the area is likely using the existing two track road network and the two “cherry-stem” roads.

Recommendation:

- We recommend all 23,700 acres be released to multiple use. Wilderness designation is not appropriate (i.e. does not contain minimal human imprint) and would be unmanageable as wilderness. It therefore would not meet the “qualified” criteria of the Cities/County.



**Skedaddle CA-020-0612** (0 acres non-suitable and 160 acres suitable)

Non-Suitable Characteristics:

- Only 160 acres of this wilderness are located in Nevada, so the area does not meet the 5,000 acre threshold for Wilderness.

Recommendation:

- While BLM found the 160 acres in Nevada to be suitable, this area is well below the 5,000 acre threshold for wilderness, nor does it contain minimal human imprint. Consequently, the area does not meet the “qualified” criteria outlined by the Cities/County and should be released to multiple use.

**Twin Peaks WSA CA-020-619A** (20,015 acres non-suitable and 47,270 acres suitable)

Non-Suitable Characteristics:

- Our studies of satellite imagery show significant color anomalies on the southwest and northeast sides of the area. The bleaching and iron staining may correlate with areas of hydrothermal alteration which is associated with mineral deposits.
- Manmade features in the area include 9 miles of fence, 2 stock ponds, 8 developed springs, 1 well with windmill, 38 miles of access ways.
- A ½ mile long dirt airstrip is located on the southwest edge.
- Periodic overflights by military aircraft will affect wilderness characteristics.

Recommendation:

- We recommend the release 20,015 acres to multiple use. This area does not have minimal human imprint. Consequently, the area does not meet the “qualified” criteria outlined by the Cities/County.
- We would not be opposed to the designation of 47,270 acres as suitable for wilderness following the 1991 BLM Record of Decision. Stakeholders, including ranchers, should be consulted to address access roads and appropriate boundary adjustments to ensure operations can continue in an efficient manner.

**Wall Canyon WSA CA-020-805** (46,305 acres non-suitable and 0 acres suitable)

Non-Suitable Characteristics:

- Our studies of satellite imagery show significant color anomalies on the west, east and south sides of the area. The bleaching and iron staining may correlate with areas of hydrothermal alteration which is associated with mineral deposits.
- A significant manmade imprint consisting of 57 miles of two track roads (our digitizing off satellite imagery), 13 reservoirs, 11 developed springs and 24 miles of fence line (12 miles follow bladed lines) detract from the natural character of the landscape in this WSA.
- We believe the area has only limited opportunities for primitive and unconfined recreation. Opportunities for solitude are also impacted due to the presence of well-

developed boundary roads which ranchers, hunters and OHV users can travel on and enter the area easily.

- The southern part of the WSA will be difficult to manage due to flat sloping topography with low growing vegetation. The northern part, with significant private inholdings, will also be difficult to manage if the owners improve their access roads.

Recommendation:

- We recommend the release all 46,305 acres to multiple use. The BLM recognized that Wall Canyon differs little from the surrounding region. The high density of two track roads and trails and heavy ranching use are also factors in favor of releasing this area. This area does not meet the criteria for minimal human imprint and does not meet the “qualified” criteria as outlined by the Cities/County.

**Summary**

Past studies have demonstrated that much of the land proposed as wilderness in Washoe County is not suitable for such designation. Furthermore, those lands cannot be designated as wilderness under the criteria established by the Cities/County. The return of lands to multiple use will result in economic benefits to the region as well as an increase in the recreational opportunities for the residents and visitors of western Nevada. The NMEC and the NvMA greatly appreciate Reno, Sparks and Washoe County’s open and inclusive process in developing these proposals. We look forward to continuing this partnership and are available as a resource for the future.

Sincerely,



David Shaddrick  
President  
Nevada Minerals  
Exploration Committee



Dana Bennett, PhD  
President  
Nevada Mining Association