

January 16, 2018 — Re-submitted January 30th 2020

To: *New Washoe County Land Bill Comments*

RE: Request removal of Fox Range and Pole Creek Wilderness Designation from the Washoe Public Lands Management Act

We believe that the Fox Range and Pole Creek areas should be removed from consideration as wilderness areas and returned to Multiple Landuse Management Status. It would be a waste of resources and recreational opportunities to designate these areas as wilderness.

Attached are several documents that support the above statement.

Over a 15+ year time frame the U.S. Bureau of Land Management (BLM) developed, through an Environmental Impact Statement (EIS) Process, a rationale for areas that should be considered suitable and areas considered non-suitable for wilderness designation based on extensive analysis of the existing and potential uses of the land. The Bureau of Land Management determined, through this EIS process, that both the Fox Range and Pole Creek areas should not be classified as wilderness. Accordingly, in subsequent BLM documents and maps these areas have been shown as Non-Suitable for wilderness designation. The BLM definition of "non-suitable" reads in part "... as not appropriate and not acceptable for preservation and designation as wilderness based on an analysis of the existing and potential uses of the land".

Attachment 1: Fox Range wilderness study area summary text section and boundary map from "NEVADA WILDERNESS STUDY AREA NOTEBOOK", BLM Winnemucca Field Office, April 2001. This document summarizes BLM findings for the Fox range area. Please note the first sentence under "**2. Recommendations and Rationale**" section on the first page. It recommends release of the entire area for uses other than designated wilderness.

Attachment 2: Pole Creek wilderness study area summary text section and boundary map from "NEVADA WILDERNESS STUDY AREA NOTEBOOK", BLM Winnemucca Field Office, April 2001. This document summarizes BLM findings for the Pole Creek area. Please note the first sentence under "**2. Recommendations and Rationale**" section on the first page. It recommends release of the entire area for uses other than designated wilderness.

Attachment 3: Labeled "Plate 12 - Wind Power potential" is clipped from the report entitled "Potential Resources Associated with Proposed Roadless Areas in Nevada (Second Edition)" by Ronald H. Hess and Jonathan G. Price, Nevada Bureau of Mines and Geology Open-File Report 06-12. This is newer data that was not included in the BLM data. The Fox Range is the area contained in the red outline. Note that areas of the Fox Range and Pole Creek have future potential for large scale wind energy production.

Wind Energy along with other potential land uses such as metals, minerals, and geothermal energy production, grazing, hunting, motorized and non-motorized back country activities, development of water resources, as well as primitive and not so primitive camping and hiking adventures will all be possible in these areas if they are managed as multiple landuse resources and not locked up as wilderness.

Please include this letter and attachments as part of the public record regarding the Washoe Public Lands Management Act.

Thank you for your time and consideration on these issues.

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FOX RANGE WILDERNESS STUDY AREA

1. THE STUDY AREA - 75,404 acres

The Fox Range WSA (NV-020-014) is located in central Washoe County, approximately 10 miles south of Gerlach, Nevada. Reno, Nevada is within 2 hours driving time of the study area and Sacramento, California is 4 hours driving time away. The WSA includes 75,404 acres of public land and surrounds 400 acres of private land. The northern and western boundary consists of a combination of roads and the Western Pacific Railroads; the southern boundary abuts a road and the Pyramid Lake Indian Reservation; and the eastern boundary is composed of roads, a powerline and private lands.

The Fox Mountain WSA is approximately 20 miles long in a north-south direction and 2 to 9 miles across in an east-west direction. It straddles the north end of the Fox Mountain Range, a typical range of the Basin and Range Geomorphic Province. Elevations range from 3,900 feet to 7,608 feet. The Smoke Creek Desert lies to the west and the San Emidio Desert to the east. Both of these deserts are represented on the fringe of the WSA.

There are three distinct landforms: the highly dissected rugged terrain of steep canyons and prominent ridges to the west, the smoother rolling hills and the desert piedmont located on both the east and west fringes of the WSA. There is some riparian vegetation as well as barren ridges and sand dunes.

2. RECOMMENDATION AND RATIONALE

The recommendation for this WSA is to release all 75,404 acres for uses other than wilderness.

In this WSA, the mineral potential outweighs the wilderness resources. Nine thousand eight hundred acres have high metallic mineral potential and 25,600 acres have moderate metallic mineral potential. There are 14,000 acres with high geothermal potential and 11,800 acres with moderate potential. There would also be manageability problems associated with the 2,767 acres (3% of WSA) of oil and gas leases and the 2,100 acres of preFLPMA mining claims. The claim holders and the possessors of the leases would have the right to develop their prospects.

It is projected that a 320 acre (100 acres in WSA) open pit precious metal mine is likely to be developed as well as two 10-acre underground precious metals mines. There would be 3 1/2 miles of access roads, waste dumps and staging areas associated with the mines. Development of these operations would severely reduce the wilderness characteristics of the study area.

Potential development of the 400 acres of private lands would affect an area greater than the actual disturbance. Development of these lands would greatly diminish the values of naturalness and solitude in other parts of the study area. Since the BLM is required to provide reasonable access to inholding owners, construction of access roads through the area would create an additional erosion of wilderness values. In summary, the mineral potential, combined with the manageability difficulties, outweigh the wilderness values in this WSA.

3. WILDERNESS CHARACTERISTICS

A. Naturalness: The WSA is predominantly natural. The west side of the Fox Range is a highly dissected, rugged landform of steep canyons and prominent ridges. There is an abrupt transition from the desert piedmont on the west to the range itself. A large bowl-like basin, Juniper Flat, is located near the ridge crest.

The east side of the range is a smoother, more rolling landform. The terrain alternates between narrow, confined drainages and more open drainages with several major canyons present. The steep portions of this section become gently sloping to the east where the land blends gradually into the San Emidio Desert. There is a small area of granitic outcrops and remnant boulders just east of Pah Rum Peak. The fringing desert piedmont is a transition area between the Fox Range and the Smoke Creek Desert to the west and the San Emidio Desert to the east. It is a typical alluvial landscape with gentle slopes and shallow parallel washes. This section contains several small sand dune areas, most notably along the northern tip.

The one grazing allotment has several range improvements - six developed springs, two corrals, two study plots, one reservoir and one fence (1.5 miles long). There are also three roads (8.5 miles) and seventeen ways (18.4 miles). A portion of the northeast boundary is formed by a powerline and a road which are

visible from adjacent areas in the unit. The Western Pacific Railroad along the northern and western boundary is both visible and audible from adjacent areas in the WSA. Overall, the impact of these and other features is slight because of the large size of this WSA.

B. Solitude: The WSA offers outstanding opportunities for solitude. On the west side of the range, low shrubs and scattered juniper offer fair to poor vegetative screening, but the highly dissected drainages offer excellent topographic screening. The east side is similar to the west with the low shrubs and scattered juniper offering fair to poor vegetative screening with fair topographic screening in rolling hill country and some good locations in deeper cut drainages. The fringing desert piedmont offers poor screening both from vegetation and topography because of the low shrubs and generally flat terrain. There is light, periodic travel both on the boundary roads and interior roads and ways. The Western Pacific Railroad is visible and audible from portions of the WSA on the north and west sides. Military aircraft fly over occasionally but the WSA is of a sufficient size to provide solitude and secluded spots are easily found within the unit.

C. Primitive and Unconfined Recreation: The area contains recreation opportunities similar to the other mountain ranges in the region. There are no particularly unusual recreation draws, attractions or desirable destinations within the study area. There are opportunities for primitive and unconfined recreation such as day-hiking, camping, backpacking, hunting, horse-packing, rock climbing and scrambling, and nature study. History enthusiasts are interested in the fact that part of John C. Fremont's 1842-1843 route, with Kit Carson as guide, followed the eastern edge of the WSA, but no trace of his passage still exists. The WSA is in the Fox and Lake Ranges Wild Horse Herd Use Areas. There is potential for a fishery in Wild Horse Canyon, although none presently exist.

D. Special Features: The history associated with Fremont's 1842-1843 route is a special feature of this area. It is also within the viewshed of the Noble's Route of the Immigrant Trail.

4. MANAGEABILITY

The study area is capable of being managed as wilderness but there will be some manageability concerns. One percent of the WSA (867 acres) is under geothermal leases; three percent of the area (2,267 acres) is under oil and gas leases; there is an additional three percent of the WSA with preFLPMA mining claims (2,100 acres); and there are 400 acres of private inholdings. If any of these parcels are developed, as the owners/possessors have the legal right to do, intrusions created by mining or drilling operations would seriously and adversely impact the wilderness values present. Access to allow the owners/possessors to reach these parcels would also have to be granted. This would involve new roads scarring up the countryside and the additional noise and dust caused by vehicles working in the area.

A management concern is the fact that 13,000 acres (17% of WSA) are accessible to off-road vehicles .

5. ENERGY AND MINERAL RESOURCE VALUES

The following conclusions were reached regarding this study area: 9,800 acres rated high for metallic mineral potential (antimony, lead, zinc, copper, nickel, mercury, molybdenum, gold and silver), 25,600 acres rated moderate for metallic mineral potential (same as above with the exception of lead), 14,000 acres rated high for geothermal potential and 11,800 acres with moderate geothermal potential. Portions of the Cottonwood Mining District and the Wild Horse Mine occur in cherrystem areas in the heart of the WSA. The mines in these areas have been past producers of gold, silver, copper, lead, zinc and antimony. This WSA has been nominated as an "Area of Critical Mineral Potential" by Exxon Minerals Company.

There are 2,100 acres of mining claims, 867 acres of geothermal leases and 2,267 acres of oil and gas leases in the WSA. There is no present production of any mineral or geothermal resource in the study area.

It is projected that a 320 acre (100 acres in WSA) open pit precious metal mine is likely to be developed as well as two 10 acre underground precious metals mines if the area were not to be designated as wilderness. There would be 3 1/2 miles of access roads, waste dumps and staging areas associated with the mines.

In summary, quantities of various mineral or geothermal resources are unknown, but the potential for occurrence is from moderate to high in several portions of the WSA.

6. SUMMARY OF WSA-SPECIFIC COMMENTS

During the initial and intensive inventory stages (1978-1980), many of the 16 comments addressed characteristics of the area (e.g., intrusions, resources, wilderness qualities) or suggested boundary changes. Reasons given for supporting WSA status were naturalness and opportunities for solitude and recreation. Reasons given for opposing wilderness study area status included other resource values, roads and intrusions.

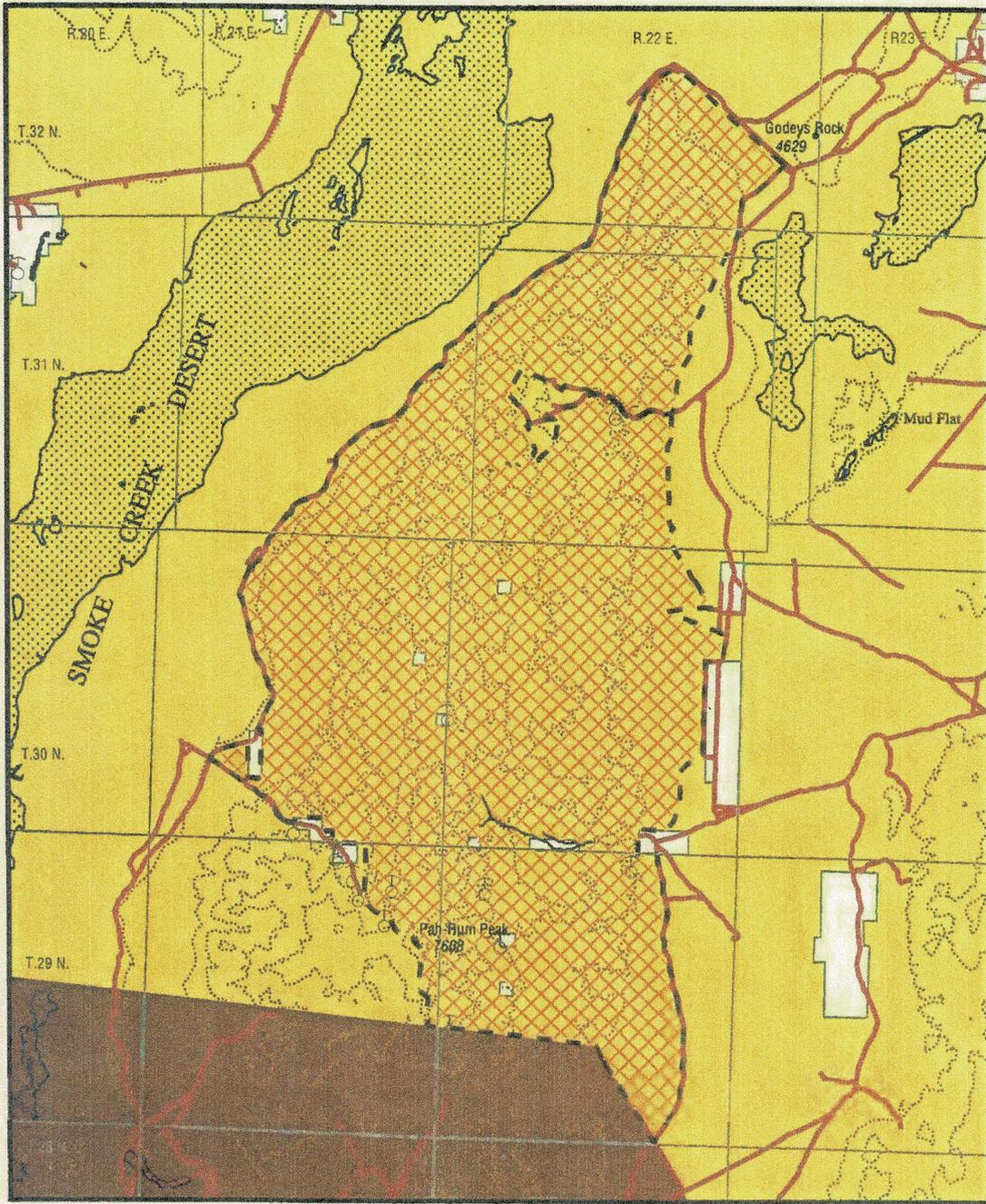
These comments addressed the entire 100,000 acres which became the Fox Range and the Pole Creek WSAs. About 12,000 acres of the original study area have since been released from wilderness consideration.

During the 90-day comment period for the Draft Wilderness Environmental Impact Statement, three formal public meetings were held in Nevada (Gerlach on November 1, Winnemucca on November 3, and Reno on November 8, 1983). During this period, 72 comments were received; six of them were oral and 66 were written. All of the oral comments supported more wilderness than what was recommended in the draft EIS (no wilderness). Of the 66 written comments, 56 of them recommended more wilderness than that recommended in the draft EIS and 10 agreed with the proposed action (no wilderness). The subject of comments were the intrusions, such as fences, roads and private property, as well as the area's low wilderness quality. Other people said that the canyons were impressive and that the WSA's closeness to Reno should be considered.

The Governor of the State of Nevada concurred with The Bureau's recommendation. No comments about wilderness were received from Washoe County agencies or officials. The U.S. Air Force supports wilderness designation provided no restrictions are placed on military flights. It has promised to work with the BLM if military flights create problems in some areas.

No comments have been received on the Final Environmental Impact Statement

Fox Range Wilderness Study Area WSA BOUNDARIES AND LAND OWNERSHIP



— Road
○ Spring
1 0 1 Miles
CONTOUR INTERVAL 200 METERS (656 FEET)
☪ Lake
☪ Dry Lake

■ BLM
□ Private Land
■ Other Agency
-- Wilderness Study Area Boundary
XXXX Recommended Non-Suitable



POLE CREEK WILDERNESS STUDY AREA

1. THE STUDY AREA - 12,969 acres

The Pole Creek WSA (NV-020-014A) is located in central Washoe County, about 20 miles southwest of Gerlach, Nevada. It is a 3 hour drive from Reno. The WSA includes 12,969 acres of public land and no private or state lands. The area is bordered on the south by the Pyramid Lake Indian Reservation, to the west and northwest by a road and the Western Pacific Railroad and on the north and east by private land. The WSA is roughly triangular in shape with 5 or 6 miles on a side.

The study area lies along part of the west face of the Fox Range, a typical mountain range of the Basin and Range Geomorphic Province. The Smoke Creek Desert lies to the west. There are two distinct landforms within the study area: part of the Fox Range and the fringing desert piedmont. The Fox Range is a highly dissected, rugged landform of steep canyons and prominent ridges. Along the east edge and adjacent to the main ridge line, the terrain is markedly smoother and less dissected. There are several prominent canyons in this section, running both north-south and east-west.

The fringing desert piedmont is the transition zone between the Smoke Creek Desert to the west and the Fox Mountain Range. It is an alluvial landscape with gentle slopes and shallow parallel washes and small wave-cut terraced hills to the south. The elevation of the WSA ranges from 3,870 feet near the railroad to 7,608 at the summit of Pah Rum Peak

2. RECOMMENDATION AND RATIONALE

The recommendation for this WSA is to release all 12,969 acres for uses other than wilderness.

The Pole Creek WSA is recommended for uses other than wilderness because the high and moderate mineral potentials identified justify management emphasis on continued access for mineral exploration and development rather than management as a wilderness area. Three thousand and four hundred acres (26% of WSA) are rated as having high potential for metallic minerals and 9,569 acres (the remainder of the WSA) are rated as having moderate mineral potential. The minerals involved are lead, copper, zinc, gold, silver, tungsten, mercury, molybdenum and nickel. Also, 3,700 acres have moderate geothermal potential. There are 100 acres of pre-FLPMA mining claims in the WSA.

Based on current and past activities in the area, short-term interest in the Pole Creek WSA is likely. This interest would result in precious metal exploration consisting of cross-country travel, small drill sites and 1/2 mile of access roads disturbing a total of five acres. There are no existing geothermal leases, however, the exploration activities would continue with or without additional leasing activities. Oil and gas potential has been identified as being low, so no exploration is projected for them.

3. WILDERNESS CHARACTERISTICS

A. Naturalness: The WSA is predominantly natural. There are two distinct landforms within the study area: part of the Fox Range and the fringing desert piedmont. The Fox Range is a highly dissected, rugged landform of steep canyons and prominent ridges. Along the east edge and adjacent to the main ridge line, the terrain is markedly smoother and less dissected. There are several prominent canyons in this section, running both north-south and east-west. The fringing desert piedmont is the transition zone between the Smoke Creek Desert to the west and the Fox Mountain Range. It is an alluvial landscape with gentle slopes and shallow parallel washes and small wave-cut terraced hills to the south.

Range improvements in the two grazing allotments consist of two developed springs, seven miles of fence and two vehicle ways totalling 2.4 miles. The Western Pacific Railroad runs along the western boundary and is visible and audible from adjacent areas in the WSA. The main mining area in Wild Horse Canyon is visible from small portions inside the unit.

B. Solitude: In the Fox Range section of the WSA, low shrubs and scattered juniper offer fair to poor vegetative screening while highly dissected drainages offer excellent topographic screening. Low shrubs provide minimal vegetative screening in the fringing desert piedmont section. Also, topographic screening is generally poor except on the wave-cut terraced hills on the south end where it is fair.

With the exception of the area within Wild Horse Canyon which has mining activity in it, the WSA is of a size and shape that would provide solitude. The low military flights and the railroad are also major external impacts on solitude. Periodic, light traffic along the boundary roads is visible from immediately adjacent areas within the unit but does not create a significant impact.

C. Primitive and Unconfined Recreation: The WSA has outstanding opportunities for primitive and unconfined recreation. There is easy accessibility both to the unit and within it. There is a variety of wildlife and excellent views of the Smoke Creek Desert to the west. Day-hiking, backpacking, camping, hunting, rock-climbing and nature study are activities that are known to occur. There are no known fish populations but potential for a fishery exists in Wild Horse Canyon. The WSA is in the Fox and Lake Ranges Wild Horse Use Area so people interested in viewing wild horses and burros may have the opportunity.

D. Special Features: There are no special features in the WSA.

4. Manageability (the area must be capable of being effectively managed to preserve its wilderness character):

The WSA is capable of being managed as wilderness. There will be manageability problems, however, associated with access to and development of the 100 acres of pre-FLPMA mining claims. Access to allow the development and operation of the mining claims would have to be granted which would result in new roads into the area. There would be management concerns associated with the following: vehicle ways (2.4 miles), easy accessibility for ORVs (3,000 acres or 23% of WSA) and occasional military flights.

5. ENERGY AND MINERAL RESOURCE VALUES

The following conclusions were determined: 3,400 acres rated high for metallic mineral potential (lead, copper, nickel, gold, zinc, mercury, silver and molybdenum), 9,569 acres rated moderate for metallic mineral potential (lead, tungsten, mercury, and molybdenum) and 3,700 acres rated as having moderate geothermal potential.

There is no present production of any mineral or geothermal resources in the study area. The Wild Horse Mine, located just outside the northern boundary of the WSA, has been a past producer of gold and silver. The WSA was nominated an "Area of Critical Mineral Concern" by Exxon Minerals Company. Based on surrounding current and past metallic mineral exploration/development, short-term interest within the Pole Creek WSA is likely. This interest would result in precious metal exploration, consisting of crosscountry travel, one mile of drill roads and pads, dozer trenches and open cuts disturbing five acres on the southwest side.

Geothermal interest has subsided compared to the past, however, proposed developments are increasing in the surrounding areas. This interest would result in exploration consisting of cross country travel, small drill sites and 1/2 mile of access roads disturbing 5 acres along the west side. There are no existing geothermal leases, however, these exploration activities would occur with or without additional leasing activities. No exploration or development is expected for low potential oil and gas.

In summary, quantities of various mineral and energy resources are unknown but the potential for occurrence is from moderate to high throughout the entire WSA. The total acres of projected disturbance resulting from energy/mineral activity would be approximately 10 acres.

6. SUMMARY OF WSA-SPECIFIC COMMENTS

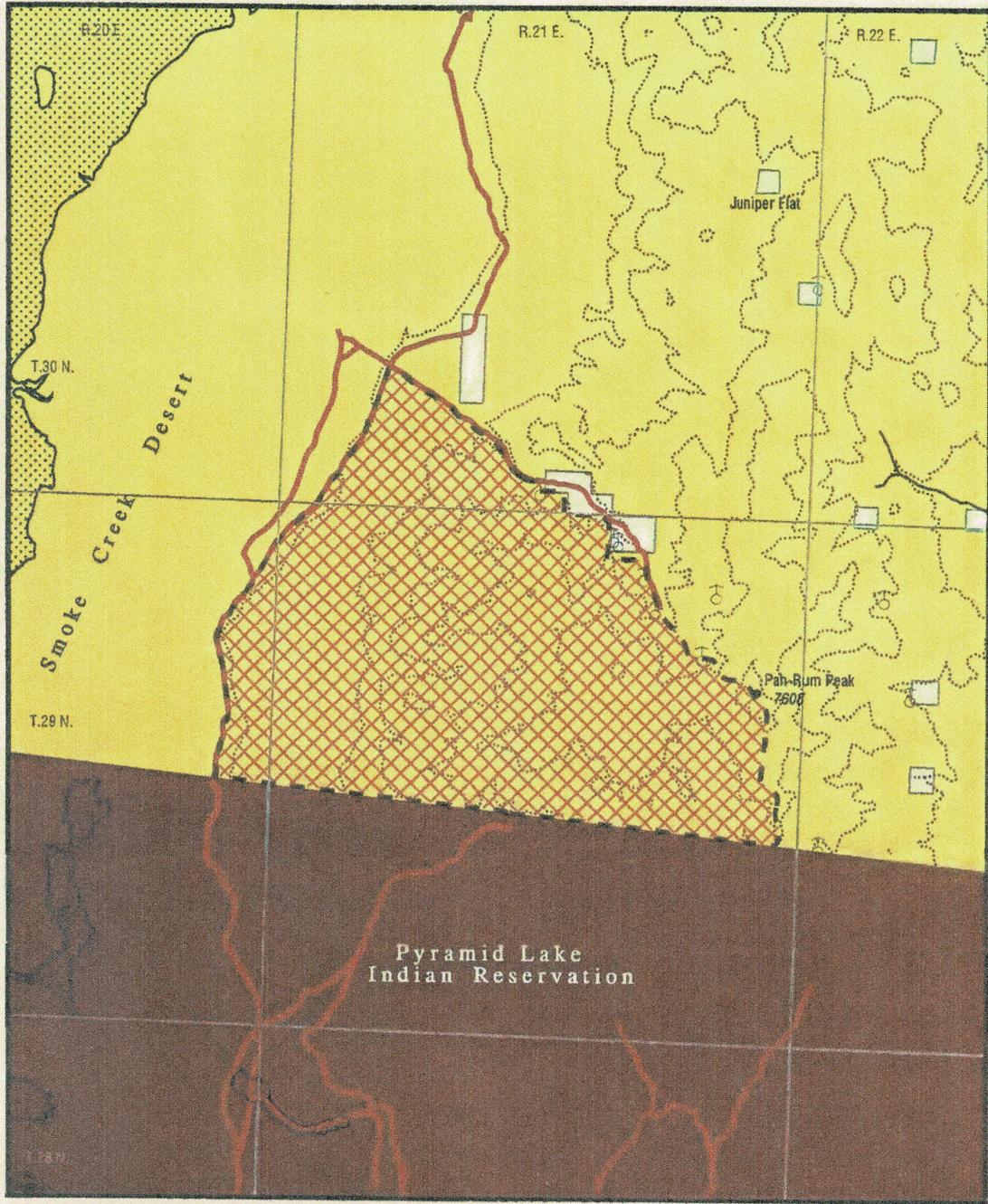
During the initial and intensive inventory stages (1978-1980) many of the 16 comments discussed characteristics of the area (e.g., intrusions, resources, wilderness qualities) or suggested boundary changes. Reasons given for supporting wilderness study status were the following: naturalness and opportunities for solitude and recreation. Reasons given for opposing wilderness study area status were the following: other resource values, roads and intrusions. These comments addressed the entire 100,000 acres which became the Fox Range (014) and Pole Creek (014A) WSAs. About 12,000 acres of the original study area have since been released from wilderness consideration.

During the 90-day comment period for the draft Wilderness Environmental Impact Statement, three formal public meetings were held in Nevada (Gerlach on November 1, Winnemucca on November 3 and Reno on November 8, 1983). Of the 9 written comments received during this period, three of them supported more wilderness than the draft EIS (no wilderness) and six of them agreed with the draft EIS. Several comments discussed the need to preserve the naturalness, wildlife, scenery and recreation opportunities for future generations.

No comments about wilderness were received from Washoe County agencies or officials. The Governor of the State of Nevada concurred with the Bureau's recommendation. The U.S. Air Force supports wilderness designation provided no restrictions are placed on military flights. It has said that it will work with the BLM if military flights create problems in some areas.

No comments were received on the final EIS.

Pole Creek Wilderness Study Area WSA BOUNDARIES AND LAND OWNERSHIP



— Road
○ Spring

1 0 1 Miles

☁ Dry Lake

CONTOUR INTERVAL 200 METERS (656 FEET)

■ BLM
□ Private Land
■ Other Agency

-- Wilderness Study Area Boundary
☒ Recommended Non-Suitable

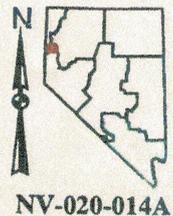
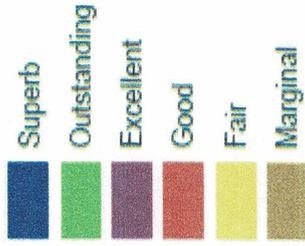


Plate 12 - Wind power potential.

Fox Range and Pole Creek Wilderness Study Areas contained in red outline. Note areas of Wind Energy Production Potential ranging from Marginal through Outstanding in the higher elevation areas of the Range.

NREL Nevada Wind Potential



This map shows areas assessed as poor to superb for wind-power generation at an elevation of 50 meters above the ground.

Source: U.S. Department of Energy, National Renewable Energy Laboratory, (www.eere.energy.gov/windandhydro/windpoweringamerica/maps_template.asp?stateab=nv).

Data compiled by Ronald H. Hess and Jonathan G. Price. Report prepared by the Nevada Bureau of Mines and Geology in cooperation with the Nevada Division of Minerals.

This information should be considered preliminary. It has not been edited or checked for completeness or accuracy.

The Wind Power Potential information presented above was taken from the following report: "Potential Resources Associated with Proposed Roadless Areas in Nevada (Second Edition)", by Ronald H. Hess and Jonathan G. Price, Nevada Bureau of Mines and Geology Open-File Report 06-12.