

# EGAN WILDERNESS RECOMMENDATIONS

## FINAL ENVIRONMENTAL IMPACT STATEMENT

1987

U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ELY DISTRICT OFFICE  
ELY, NEVADA

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FINAL ENVIRONMENTAL IMPACT STATEMENT

WILDERNESS RECOMMENDATIONS

for the

EGAN RESOURCE AREA

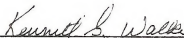
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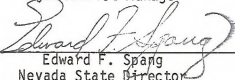
DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

ELY DISTRICT



Kenneth G. Walker  
Ely District Manager



Edward F. Spang  
Nevada State Director

The proposed land use plan contains wilderness recommendations, subject to change during administrative review, on 236,780 acres of public land in White Pine, Nye, and Lincoln Counties, Nevada. The action responds to the mandate of Section 603 of the Federal Land Policy and Management Act of 1976 to review all public land roadless areas of 5,000 acres or more and roadless islands having wilderness characteristics; determine their suitability or nonsuitability for wilderness designation; and report these suitability recommendations to the President no later than October 21, 1991.

For Further information contact: Mr. Gene L. Draiss, Egan Resource Area manager at Star Route 5, Box 1, Ely, Nevada 89301 or call (702) 289-4865.

Date final statement was made available to the Environmental Protection Agency and the public:

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## ABBREVIATIONS

AUM - Animal Unit Month

BLM - Bureau of Land Management

BM - Bureau of Mines

CFR - Code of Federal Regulations

DLE - Desert Land Entry

EIS - Environmental Impact Statement

FLPMA - Federal Land Policy and Management Act of 1976

NDOW - Nevada Department of Wildlife

ORV - Off-Road Vehicle

RA - Resource Area

RMP - Resource Management Plan

USGS - United States Geologic Survey

WSA - Wilderness Study Area

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# SUMMARY

## PURPOSE

The purpose of the proposed actions is to manage and preserve the wilderness characteristics on 107,035 acres within all or part of three of the four wilderness study areas (WSA's) in the Egan Resource Area and to manage the remaining 129,745 acres within all or part of three WSA's for purposes other than wilderness.

The four WSA's being studied are covered by the Egan Resource Management Plan (RMP). These study areas are listed below:

WSA Name	WSA Number	Acreage	County
Goshute Canyon	NV-040-015	35,594	White Pine/Elko
Park Range	NV-040-154	47,268	Nye
Riordan's Well	NV-040-166	57,002	Nye
South Egan Range	NV-040-168	96,916	Lincoln/White Pine

## ISSUES

The scoping process for the Egan Resource Area Wilderness EIS encompassed issues identified by Bureau of Land Management (BLM) staff; by the public during formal scoping meetings on issue identification in Ely and Reno; during a public scoping period held from July 16 to August 31, 1981; and from comments on the draft EIS by the public and by federal, state, and local agencies. The environmental issues identified for analysis in this EIS are listed below:

- Impacts on Wilderness Values
- Impacts on Exploration and Development of Mineral Resources
- Impacts on Exploration and Development of Energy Resources
- Impacts on Grazing Facility Maintenance and Construction
- Impacts on Woodland Products Harvest
- Impacts on Recreational Off-Road Vehicle Use
- Impacts on Bonneville Cutthroat Trout Habitat

The following issues were identified during scoping but were not selected for detailed analysis in the EIS.

- Economic Impacts on Livestock Operations
- Impacts on Air Quality Classification
- Impacts on State and Private Inholdings
- Impacts of Wilderness Designation on Reintroduction of Bighorn Sheep
- Impacts on Water Quality
- Impacts on Cultural Resources
- Impacts on Hunter and Trapper Access
- Impacts on Wildlife
- Impacts on Military Air Operations Over Wilderness Areas
- Impacts on Threatened or Endangered Species
- Impacts on Soil Erosion

## ALTERNATIVES AND CONCLUSIONS

The alternatives assessed in this EIS include: a proposed action for each WSA; a no wilderness and an all wilderness alternative for each WSA; and partial wilderness alternatives for the four WSA's.

### GOSHUTE CANYON WSA

NV-040-015

#### PROPOSED ACTION (Partial Wilderness Alternative No. 1)

The Proposed Action recommends 22,225 acres as suitable for wilderness designation (including 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area) and 13,369 acres as nonsuitable for wilderness designation.

#### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, special geologic features, stands of bristlecone pine, and Bonneville cutthroat trout habitat. Long-term negative impacts would occur in the nonsuitable portion of the WSA on approximately 200 acres. The remaining 13,169 nonsuitable acres would retain their wilderness values.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA and development of these resources is not expected to take place. There would be no impacts on the exploration or development of energy resources within the nonsuitable portion of the WSA.

There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the suitable portion of the WSA as a result of tighter wilderness restrictions. There would be no impacts to grazing facility construction within the nonsuitable portion.



The harvest of 60 fir Christmas trees every 6 years within the suitable portion of the WSA would be foregone. This would be a very minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.

Recreational ORV use of 211 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

## ALL WILDERNESS ALTERNATIVE

The All Wilderness Alternative recommends the entire 35,594-acre area as suitable for wilderness designation including 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area.

### CONCLUSIONS .

The result of designation of the 35,594-acre Goshute Canyon WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; the special geologic features, highly scenic values, stands of bristlecone pine, and the Bonneville cutthroat trout habitat.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 92 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 24 acres within the suitable portion if designation occurs. A small heap-leach operation would not occur due to lack of valid and existing claims.

All lands within the WSA would be withdrawn from mineral leasing. Geophysical exploration totalling 13 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and exploration and development is not expected to take place.

There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the WSA as a result of tighter wilderness restrictions.

The harvest of 450 Christmas trees every 6 years and 780 cords of fuelwood would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand.

## GOSHUTE CANYON

Recreational ORV use of 320 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.

There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

## PARTIAL WILDERNESS ALTERNATIVE NO. 2

The Partial Wilderness Alternative No. 2 recommends 26,436 acres (including 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area) as suitable for wilderness designation and 9,158 acres nonsuitable for wilderness designation.

### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, special geologic features, stands of bristlecone pine, and Bonneville cutthroat trout habitat. Long-term negative impacts would occur in the nonsuitable portion of the WSA on approximately 130 acres. The remaining 9,028 nonsuitable acres would retain their wilderness values.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the suitable portion of the WSA as a result of tighter wilderness restrictions. There would be no impacts to grazing facility construction within the nonsuitable portion.

The harvest of 270 Christmas trees every 6 years and 420 cords of fuelwood and commercial sales of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.

Recreational ORV use of 240 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

## NO WILDERNESS ALTERNATIVE

The No Wilderness Alternative recommends the entire 35,594-acre WSA as nonsuitable for wilderness designation, including the 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area.

### CONCLUSIONS

Long-term physical impairment to the wilderness qualities of the Goshute Canyon WSA would occur on approximately 260 acres in the southern and western portions of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values within the WSA would not be impaired. The geologic features, bristlecone pine stands and Bonneville cutthroat trout habitat would not be affected by a no wilderness designation. The remaining 35,334 acres would retain their wilderness values.

All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources.

All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

There would be no impacts on grazing facility maintenance and construction.

There would be no impacts on woodland products harvest.

There would be no impacts on recreational ORV use.

There would be no impact to the Bonneville cutthroat trout habitat. Management would be slightly easier because stabilization projects would not have to meet the wilderness criteria in the Wilderness Management Policy.

## PARK RANGE WSA

NV-040-154

### PROPOSED ACTION (All Wilderness Alternative)

The Proposed Action recommends the entire 47,268-acre Park Range WSA as suitable for wilderness designation.

#### CONCLUSIONS

The result of designation of the Park Range WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; the pristine mountain meadows, highly scenic values, and the archaeological values.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 2 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 1 acre within the suitable portion if designation occurs. Favorability for development of mineral resources is low within the WSA and development of mineral resources is not expected.

All lands within the WSA would be withdrawn from mineral leasing. Geophysical exploration totalling 1.5 miles would be foregone due to tighter wilderness restrictions. Favorability for exploration or development of energy resources is low within the WSA and development is not expected to take place.

There would be negligible impacts to grazing facility maintenance and construction.

### PARTIAL WILDERNESS ALTERNATIVE NO. 1

The Partial Wilderness Alternative No. 1 recommends 38,573 acres as suitable for wilderness designation and 8,695 acres as nonsuitable for wilderness designation.

#### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, pristine mountain meadows, and archaeological values. Long-term negative impacts to the perception of wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 300 acres. The remaining 8,395 nonsuitable acres would retain their wilderness values.

Exploration and development of mineral resources would be forgone on all unclaimed lands within the suitable portion of the WSA. Neither exploration nor development of mineral resources is anticipated within the suitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

There would be negligible impacts on grazing facility maintenance and construction.

#### NO WILDERNESS ALTERNATIVE

The No Wilderness Alternative recommends the entire 47,268-acre WSA as nonsuitable for wilderness designation.

#### CONCLUSIONS

Long-term physical impairment to the perception of wilderness qualities of the Park Range WSA would occur on approximately 300 acres in the northern portion of the WSA. Opportunities for solitude and primitive and unconfined recreation would be unaffected. The highly scenic values and other special features within the WSA would not be impaired. The remaining 46,968 acres would retain their wilderness values.

All lands within the Park Range WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources.

All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

There would be no impacts on grazing facility maintenance and construction.

## RIORDAN'S WELL WSA

NV-040-166

### PROPOSED ACTION (Partial Wilderness Alternative No. 1)

The Proposed Action recommends 37,542 acres of the Riordan's Well WSA as suitable for wilderness designation and 19,460 acres as nonsuitable for wilderness designation.

### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 6,660 acres. The remaining 12,800 nonsuitable acres would retain their wilderness values.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 31 acres of surface disturbing exploration and development activity expected within the suitable portion if designation does not occur would be reduced to 9 acres if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located in the nonsuitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

There would be no impacts to grazing facility maintenance. There would be a minor impact to grazing facility construction within the suitable portion. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the suitable portion would be foregone by disallowing portions of two seedings. There would be no impacts to grazing facility construction within the nonsuitable portion of the WSA.

The harvest of 1,000 post and poles and commercial sales of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland product harvest within the nonsuitable portion of the WSA.



Recreational ORV use of 122 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

## ALL WILDERNESS ALTERNATIVE

The All Wilderness Alternative recommends the entire 57,002-acre area as suitable for wilderness designation.

### CONCLUSIONS

The result of designation of the Riordan's Well WSA as wilderness would be to preserve the naturalness and excellent opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Even with wilderness designation, long-term negative impacts to the wilderness qualities would occur on approximately 15 acres.

Exploration and development of potential mineral resources would be foregone on all unclaimed lands within the WSA. The 47 acres of surface disturbing exploration and development activity expected if designation does not occur would be reduced to 15 acres within the WSA if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located outside of the WSA.

All lands within the WSA would be withdrawn from mineral leasing. Two wildcat oil wells would be drilled on existing leases. Geophysical exploration totalling 6 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and development is not expected.

There would be no impact to grazing facility maintenance. There would be a negative impact to grazing facility construction. The absence of some additional water developments would not affect current grazing, however, better cattle distribution would not be achieved. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the WSA would be foregone by disallowing two seedings and one chaining.

The harvest of 8,100 cords of fuelwood, 1,400 posts and poles and commercial sales of pine nuts within the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.

Recreational ORV use of 185 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.

## PARTIAL WILDERNESS ALTERNATIVE NO. 2

The Partial Wilderness Alternative No. 2 recommends 45,791 acres of the Riordan's Well WSA as suitable for wilderness designation as well as an additional 2,405 acres located outside of the WSA. The remaining 11,211 acres of the WSA are recommended as nonsuitable for wilderness designation.

### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, excellent opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 5,200 acres. The remaining 6,011 nonsuitable acres would retain their wilderness values.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 47 acres of surface disturbing exploration and development activity expected within the suitable portion if designation does not occur would be reduced to 15 acres if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located in the nonsuitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

There would be no impacts to grazing facility maintenance. There would be a negative impact to grazing facility construction. The absence of some additional water developments would not affect current grazing, however, better cattle distribution would not be achieved. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the suitable portion of the WSA would be foregone by disallowing portions of two seedings and one chaining. There would be no impacts to grazing facility construction within the nonsuitable portion of the WSA.

The harvest of 14,100 cords of fuelwood and 2,400 posts and poles and commercial sales of pine nuts within the area recommended as suitable for wilderness would be foregone. This would be a minor impact since woodland products readily available outside of this area could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.



Recreational ORV use of 148 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

## NO WILDERNESS ALTERNATIVE

The No Wilderness Alternative recommends the entire 57,002-acre area as nonsuitable for wilderness designation.

### CONCLUSIONS

Long-term physical impairment to the wilderness qualities of the Riordan's Well WSA would occur on approximately 10,675 acres in the southern and north-central portion of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values within the WSA would not be impaired. Special geologic features, ponderosa pine stands, and raptor habitat would not be affected by a no wilderness designation. The remaining 46,327 acres would retain their wilderness values.

All lands within the Riordan's Well WSA would remain open for mineral entry. There would be no impact on the exploration and development of mineral resources.

All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

There would be no impacts on grazing facility maintenance and construction within the Riordan's Well WSA.

There would be no impact on woodland products harvest.

There would be no impact to recreational ORV use.

## SOUTH EGAN RANGE WSA

NV-040-168

### PROPOSED ACTION (No Wilderness Alternative)

The Proposed Action recommends the entire 96,916-acre area as nonsuitable for wilderness designation.

#### CONCLUSIONS

Long-term physical impairment to the wilderness qualities of the South Egan Range WSA would occur on approximately 1,500 acres in the northern and eastern portions of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values, including bristlecone pine, unique geologic features, and raptor habitat would not be impaired or affected by a no wilderness designation. The remaining 95,416 acres would retain their wilderness values.

All lands within the South Egan Range WSA would remain open to mineral entry. There would be no impact on the exploration and development of mineral resources.

All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

There would be no impacts on grazing facility maintenance and construction.

There would be no impacts on woodland products harvest.

There would be no impacts to recreational ORV use.

### ALL WILDERNESS ALTERNATIVE

The All Wilderness Alternative recommends the entire 96,916-acre area as suitable for wilderness designation.

#### CONCLUSIONS

The result of designation of the South Egan Range WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, bristlecone pine, and raptor habitat would also be preserved. Long-term physical impacts to the wilderness quality of the South Egan Range WSA would occur on about 14 acres.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 17 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 4 acres within the WSA if designation occurs. Favorability for development of mineral resources is low within the WSA and development of mineral resources is not expected.

All lands within the WSA would be withdrawn from mineral leasing. Two wildcat oil wells would be drilled on existing leases. Geophysical exploration totalling 5 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and development is not expected.

There would be no impacts to grazing facility maintenance. There would be minor impacts to grazing facility construction. Most of the disallowed projects (prescribed burns, seedings, and water developments) could be located outside of the WSA boundary and still achieve the same goals. Absence of these projects within the WSA would have no impact on current grazing in the area.

The harvest of 540 Christmas trees every 6 years and 360 cords of fuelwood and commercial sales of pinyon pine nuts within the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand.

Recreational ORV use of 320 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.

#### PARTIAL WILDERNESS ALTERNATIVE NO. 1

The Partial Wilderness Alternative No. 1 recommends 57,660 acres of the South Egan Range WSA as suitable for wilderness designation and 39,256 acres as nonsuitable for wilderness designation.

#### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special features such as bristlecone pine, caves, raptor habitat, and highly scenic values. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 300 acres. The remaining 38,956 nonsuitable acres would retain their wilderness values.

Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 4 acres of surface disturbing exploration activity expected within the suitable portion if designation does not occur would be eliminated if designation occurs due to lack of valid claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

## SOUTH EGAN RANGE

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development energy resources within the nonsuitable portion of the WSA.

There would be no impacts to grazing facility maintenance. There would be minor impacts to grazing facility construction within the suitable portion. The disallowed projects (prescribed burns, seedings, and a stock reservoir) could be located outside of the WSA boundary and still achieve the same goals. Absence of these projects within the suitable portion would have no impact on current grazing in the area. There would be no impacts on grazing facility construction within the nonsuitable portion.

The commercial harvest of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.

Recreational ORV use of 192 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

## PARTIAL WILDERNESS ALTERNATIVE NO. 2

The Partial Wilderness Alternative No. 2 recommends 16,560 acres of the South Egan Range WSA as suitable for wilderness designation and 80,356 acres as nonsuitable for wilderness designation.

### CONCLUSIONS

The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special features such as bristlecone pine, caves, raptor habitat, and highly scenic values. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 1,500 acres. The remaining 78,856 nonsuitable acres would retain their wilderness values.

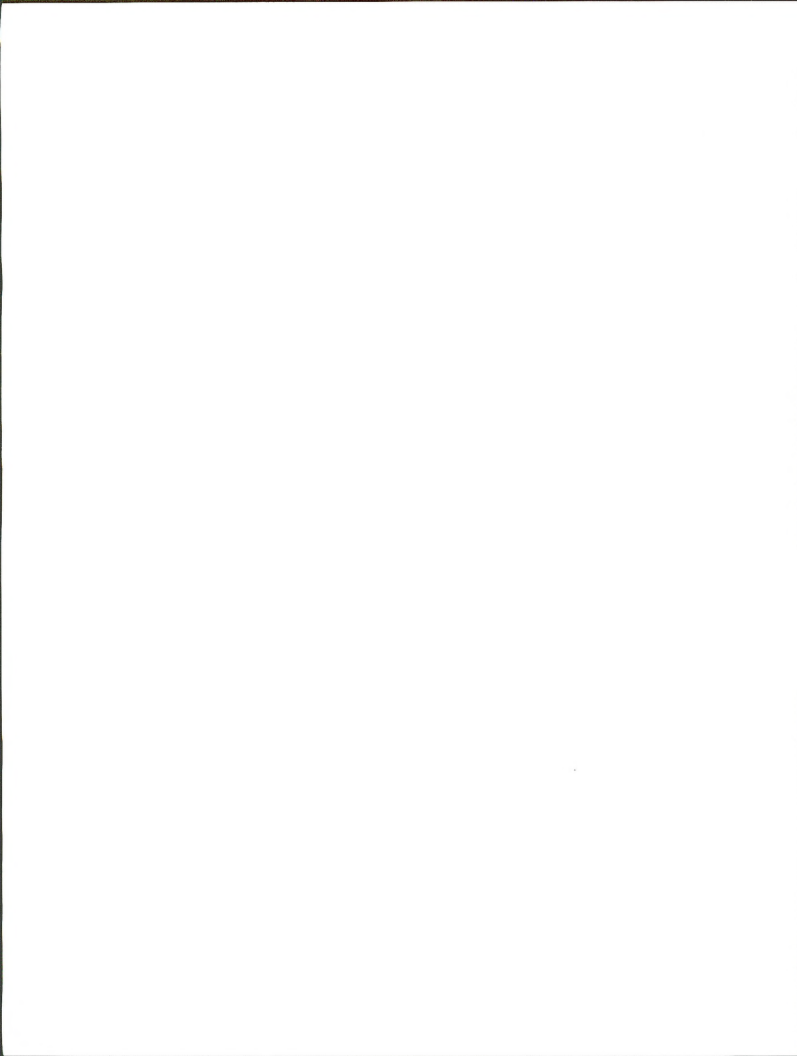
Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. Exploration of mineral resources is not anticipated to occur within the suitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or unsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the unsuitable portion of the WSA.

There would be no impacts on grazing facility maintenance and construction.

The commercial harvest of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impact on woodland products harvest within the unsuitable portion of the WSA.

Recreational ORV use of 54 visitor days annually would be foregone. The impacts of shifting this use to the unsuitable portion of the WSA or to other public lands would be negligible.



# CHAPTER 1

## Introduction

### PURPOSE AND NEED

The purpose of the proposed actions is to manage and preserve the wilderness characteristics on 107,035 acres within all or part of three of the four wilderness study areas (WSA's) in the Egan Resource Area and to manage the remaining 129,745 acres within all or part of three WSA's for purposes other than wilderness.

The Federal Land Policy and Management Act of 1976 (FLPMA) directs the Bureau of Land Management (BLM) to manage the public lands and their resources under the principles of multiple use and sustained yield. Section 603 of FLPMA requires a wilderness review of BLM roadless areas of 5,000 acres or more and roadless islands. The BLM inventory process identified WSA's which have the mandatory wilderness characteristics of size, naturalness, and outstanding opportunities for solitude and/or a primitive and unconfined type of recreation. Suitable or unsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior by October 21, 1991. The President has until October 21, 1993, to send his recommendations to the Congress. Areas can be designated wilderness only by an act of Congress. If designated as wilderness, an area would be managed in accordance with the Wilderness Act of 1964, the BLM's Wilderness Management Policy, and a wilderness management plan to be prepared for each designated area.

### LOCATION

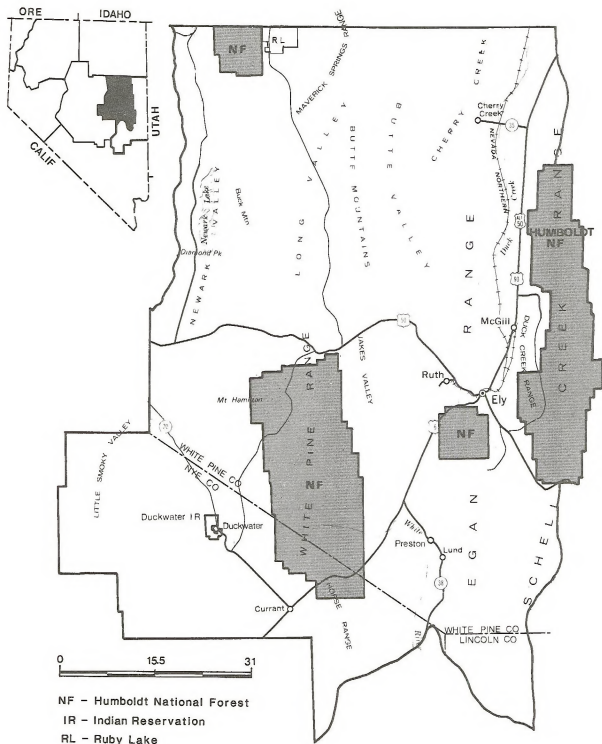
The Egan Resource Area is located in east-central Nevada, encompassing portions of White Pine, Lincoln, and Nye Counties. Refer to the Location Map and Wilderness Study Area Map for the locations of the four WSA's within the Resource Area.

TABLE 1

#### WILDERNESS STUDY AREAS

<u>WSA Name</u>	<u>WSA Number</u>	<u>Acres</u>	<u>County</u>	<u>Overlap with Other Districts/Resource Areas</u>
Goshute Canyon	NV-040-015	35,594*	White Pine, Elko	Elko District
Park Range	NV-040-154	47,268	Nye	Battle Mountain District
Riordan's Well	NV-040-166	57,002	Nye	Battle Mountain District/ Schell Resource Area
South Egan Range	NV-040-168	96,916	White Pine, Lincoln, Nye	Schell Resource Area

\* This acre figure includes the 5,009 acres of the Goshute Canyon Natural Area located within the Goshute Canyon WSA.



## EGAN RESOURCE AREA LOCATION MAP





## PLANNING PROCESS

The BLM requires public lands to be covered by a multiple-use land use plan. The Egan Resource Area's land use plan is called a resource management plan. The Egan Resource Management Plan (RMP) was prepared in accordance with the BLM's planning regulations (43 CFR 1601). Wilderness was just one of the resources included in the plan. A separate document, the Egan Wilderness Technical Report, was prepared simultaneously with the RMP. This document, made available to the public and the land managers, provided the additional analysis needed for wilderness study that could not be included in the RMP due to space restrictions.

The Wilderness Study Policy, a national policy that guides the wilderness studies, was issued by the BLM in February 1982, after public review. It mandates two criteria and six quality standards that must be addressed during wilderness study. For more detailed information refer to the actual Wilderness Study Policy, available from any BLM office, or refer to Appendix A for definitions of the criteria and quality standards.

In the draft Egan Resource Area RMP/EIS, which constituted the draft version of this document, alternatives were designated by letters (A through E) corresponding to the overall resource management alternatives. The Wilderness Technical Report which accompanied the RMP referred to the alternatives by the names, "All Wilderness," "No Wilderness," "Wilderness Emphasis," "Wilderness De-emphasis," and the "Preferred Alternative."

These designations would be confusing now that the wilderness document has been separated from the RMP/EIS. In addition, the wilderness alternatives are arranged in a different order in this document, and the "No Action" alternative has been dropped. For these reasons, no letter designations have been used for the alternatives in this final wilderness EIS. The alternatives are now referred to throughout the document simply as "No Wilderness," "All Wilderness," or "Partial Wilderness Alternative No. 1, No. 2, etc.," as appropriate.

Refer to Table 2 for a comparison of how the alternatives were treated in the various documents.

## CHANGES FROM DRAFT EIS TO FINAL EIS

As a result of comments on the draft EIS and additional field review, the Preferred Alternative for the Park Range WSA was changed. The new Proposed Action in this document is the All Wilderness Alternative. The old Preferred Alternative excluded 437 acres of seeding on the west bench. After careful review, it was found only 40 acres of the seeding was actually within the WSA boundary. It was determined that the 40 acres of seeding did not affect the naturalness of the WSA and did not warrant a separate alternative. The old Preferred Alternative was, therefore, dropped.

**TABLE 2**  
**ALTERNATIVE COMPARISON BETWEEN**  
**DOCUMENTS**

RMP Alternatives	Wilderness Technical Report Alternatives	WSA Name/Suitable Acreage	WSA Specific Alternatives in Final EIS
Preferred Alternative/ Proposed Action	Preferred Alternative/ Proposed Action	Goshute Canyon 22,225 Park Range 47,268 Riordan's Well 37,542 South Egan Range 0 Total 106,598	Proposed Action - (Partial No. 1) Proposed Action - (All Wilderness) Proposed Action - (Partial No. 1) Proposed Action - (No Wilderness)
Alternative A	No Wilderness	Goshute Canyon 0 Park Range 0 Riordan's Well 0 South Egan Range 0 Total 0	No Wilderness No Wilderness No Wilderness No Wilderness
Alternative B Alternative E	All Wilderness All Wilderness	Goshute Canyon 35,594 Park Range 47,268 Riordan's Well 57,002 South Egan Range 96,996 Total 236,860	All Wilderness All Wilderness All Wilderness All Wilderness
Alternative C	Wilderness Emphasis	Goshute Canyon 26,436 Park Range 38,573 Riordan's Well 45,791 South Egan Range 57,660 Total 168,460	Partial No. 2 Partial No. 1 Partial No. 2 Partial No. 1
Alternative D	Wilderness De-Emphasis	Goshute Canyon 0 Park Range 34,042 Riordan's Well 30,363 South Egan Range 16,560 Total 80,965	No Wilderness (Not carried forward in analysis) * (Not carried forward in analysis) * Partial No. 2

\* Refer to the 'Alternatives Considered But Dropped' Section in this chapter.

## SCOPING

Scoping for this document actually started in 1978 with the beginning of the wilderness review. Comment periods held during this early review focused mostly on the presence or absence of wilderness characteristics in the areas under review. Other issues began surfacing at that time, however. These same issues came up time and time again throughout scoping. Some of the issues dealt with potential conflicts with wilderness designation and other resource uses. These issues included: mineral and energy conflicts, restrictions on livestock grazing, access for hunters and trappers, access to and restrictions on development of private land surrounded by wilderness and restrictions on fuelwood and Christmas tree harvest. Other issues dealt with the loss of wilderness characteristics without protection, the need to provide primitive recreation opportunities, and the protection afforded wildlife and wildlife habitat. A more detailed discussion of the issues raised are presented at the end of this section.

On July 16, 1981, a "Notice of Intent" for the preparation of the Egan Resource Management Plan (including wilderness) appeared in the Federal Register to announce formally the beginning of the planning process. This initial phase (July 16 - August 31, 1981) involved developing the issues that the Egan Resource Management Plan would be addressing. An additional comment period was held from April 15 to May 21, 1982, to identify planning criteria. An active public involvement process aided in developing the EIS. Public opinion was elicited through public meetings in Ely and Reno. In addition, the Ely District mailed scoping information and copies of the draft EIS to the people and organizations on the wilderness mailing list; issued press releases to the newspapers in Nevada and Utah; and presented briefings to the Nevada State Clearinghouse, Nevada Congressional delegations, local governments, Native American groups, planning commissions, and civic organizations.

### Development of Issues

#### Issues Selected for Analysis

The environmental issues identified for analysis in this EIS follow.

1. Impacts on Wilderness Values. The wilderness values such as naturalness, opportunities for solitude, opportunities for primitive recreation, and various special features of the WSA could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSA's not be designated wilderness. The significance of these beneficial or adverse impacts is an issue for analysis in the EIS.

2. Impacts on Exploration and Development of Mineral Resources. Wilderness designation could affect the development of potential and known mineral resources by withdrawing designated lands from mineral entry. Development of existing mineral resources within designated wilderness areas could be affected by wilderness management restrictions. The impact of wilderness designation on the development of potential and known mineral resources is an issue for analysis in the EIS.
3. Impacts on Exploration and Development of Energy Resources. Wilderness designation could affect the development of potential and known energy resources by withdrawing designated lands from the mineral leasing laws. Development of existing energy resources within designated wilderness areas could be affected by wilderness management restrictions. The impact of wilderness designation on the development of potential and known energy resources is an issue for analysis in the EIS.
4. Impacts on Grazing Facility Maintenance and Construction. Wilderness designation could affect livestock operations by precluding some planned range development projects necessary for utilization of forage at planned levels. The impact of wilderness designation on the maintenance and construction of grazing and range management projects in the WSA's is an issue for analysis in the EIS.
5. Impacts on Woodland Products Harvest. Wilderness designation would prohibit the commercial or private harvest of fuelwood, Christmas trees, posts, and poles within the wilderness areas. It would also prohibit the commercial sale of pine nuts. The impact of foregoing the harvest of this resource is an issue for analysis in this EIS for the Goshute Canyon, Riordan's Well, and South Egan Range WSA's. The analysis is not an issue in the Park Range WSA because of its remoteness and the lack of interest in the area's woodland products.
6. Impacts on Recreational Off Road Vehicle Use. Wilderness designation would eliminate the use of recreational off-road vehicles (ORV's) off the cherrystemmed routes in the WSA's. Eliminating this use would shift ORV uses currently occurring in the WSA's to adjacent lands. The impact of wilderness designation on recreational ORV use within the WSA's is an issue for analysis in the EIS only on the South Egan Range, Riordan's Well, and Goshute Canyon WSA's. Rugged terrain and remoteness precludes ORV use in the Park Range WSA.
7. Impacts on Bonneville Cutthroat Trout Habitat. The impact of wilderness designation or nondesignation on the Bonneville cutthroat trout, a Class 1 sensitive species, was identified as an issue during the scoping process. The habitat and management of these fish could be affected with wilderness designation of the Goshute Canyon WSA. This impact is an issue for analysis in this EIS.

## Issues Not Selected for Analysis

The following issues were identified in scoping but were not selected for detailed analysis in this EIS. The reasons for setting each of the issues aside are discussed below.

1. Economic Impact on Livestock Operations. Concerns were raised that livestock operators could be required to modify their operations within designated wilderness areas in a manner that would have significant adverse economic impacts on their business. This issue was considered but dropped from detailed analysis because the BLM's Wilderness Management Policy provides for the continued use of wilderness areas for livestock operations at levels appropriate for proper rangeland management.

The management practices of livestock operators in the four WSA's would continue as they did prior to wilderness designation, subject to reasonable controls. The impact of wilderness designation on livestock operations as a result of curtailment of planned range developments is considered in Issue 4 above.

2. Impact on Air Quality Classification. Concerns were raised regarding the interaction between wilderness designation and air quality classification. The Wilderness Management Policy states that BLM will manage all wilderness areas to comply with the existing state air quality classification for that specific area. Wilderness designation or nondesignation would not cause the air quality classification to change. This issue was, therefore, dropped from further analysis in the EIS.
3. Impacts on State and Private Inholdings. The impact of wilderness designation or nondesignation on State or private land inholdings in WSA's was identified as an issue in comments on the Draft EIS. This issue was dropped from further consideration because the uses on these lands are not expected to change as a result of designation or nondesignation.
4. Impact of Wilderness Designation on Reintroduction of Bighorn Sheep. The Nevada Department of Wildlife has noted that bighorn sheep could be reintroduced in the South Egan Range WSA. The reintroduction of bighorn sheep, if it occurs, would be independent of the designation of the WSA as wilderness. Since the Wilderness Management Policy provides for reintroduction of native wildlife species and potential reintroduction efforts are speculative, this issue was not selected for analysis in the EIS.



5. Impact on Water Quality. The issue of how water quality would be affected by wilderness designation or nondesignation in each of the WSA's was identified by the Environmental Protection Agency. This issue was not considered in the EIS because the primary influence on water quality in these WSA's, livestock use, would not vary sufficiently with or without wilderness designation to affect water quality in any of the WSA's.
6. Impacts to Cultural Resources. Historic and prehistoric cultural resources are known to occur within all the WSA's. In the case of the Park Range WSA, limited inventory has determined that these resources may be of a significant nature. Currently, no National Register properties occur within any of the WSA's. It is not expected that impacts to cultural resources occurring from casual or unregulated uses would vary as a result of wilderness designation or nondesignation.

In addition, prior to any surface disturbing activity such as mineral development, seismic exploration, range developments, etc., a cultural resource inventory is required. For any cultural resources identified during the inventory, mitigating measures can be proposed to preserve the scientific information and/or lessen the physical impacts. The consideration given to cultural resources is in accord with Bureau responsibilities towards Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800) to identify those properties which are eligible or potentially eligible for inclusion in the National Register of Historic Places. Bureau policy is to protect, manage, and avoid inadvertent loss of cultural resources (BLM Manual 8100.06). The framework for this policy is encompassed by a body of surface protection and antiquities legislation. Thus, under any alternative, impacts to cultural resources would be approximately the same, and these cultural resources would be protected and managed in accordance with these legislative guidelines. The issue of impacts to cultural resources from wilderness designation was, therefore, dropped from further analysis.

7. Impacts to Hunter and Trapper Use. Impacts to hunters and trappers were raised as an issue, both in terms of the sport continuing and in terms of access. The Wilderness Management Policy states that hunting, fishing, and trapping are compatible with wilderness and will be allowed, subject to applicable State and Federal laws and regulations. All access routes cherrystemmed from the WSA's will continue to provide for motorized access. Consequently, there would be approximately the same level of impact with or without wilderness designation. This issue was, therefore, dropped from further consideration.

8. Impacts to the White Pine Power Project. Many people brought up the issue of how wilderness designation of the Goshute Canyon WSA would affect the White Pine Power Project which is proposed to be built within approximately five miles of the WSA. The main concern was air quality. Under the Clean Air Act (as amended, 1977), BLM-administered lands were given Class II air quality classification, which allows for moderate, well-controlled industrial and population growth. The BLM will manage designated wilderness areas as Class II unless they are reclassified by the State as a result of the procedures prescribed in the Clean Air Act (as amended, 1977). We see no impact to the White Pine Power Project as a result of wilderness designation of the Goshute Canyon WSA and have not carried this impact topic any further in the analysis. A separate environmental impact statement was prepared for the White Pine Power Project.
9. Impacts on Wildlife. Many comments during scoping and on the Draft RMP expressed a general concern for wildlife without identifying specific issues associated with wildlife. An issue dealing with wildlife in general was considered but not included in this EIS because no specific impacts on populations or the habitat of any specific species were identified. Based on the projections of development in the four WSA's, little or no change in wildlife populations or habitat is anticipated with wilderness designation or nondesignation. Prior to any surface disturbing activity, impacts to wildlife habitat are addressed in an environmental analysis of the proposed activity(s).
10. Impacts to Military Air Operations Over Wilderness Areas. Low-level military flights over the Riordan's Well WSA occur frequently. It is the BLM's policy that these flights are compatible with wilderness. The Wilderness Management Policy states "Where low (military) overflight is a problem, or expected to become a problem, wilderness management plans will provide for liaison with proper military authorities, the Federal Aviation Administration, and contact with pilots in the general area in an effort to reduce low flight."
11. Impacts to Threatened and Endangered Species. Wildlife and vegetation inventories and consultations with the U.S. Fish and Wildlife Service identified two listed endangered species within several of the WSA's; the bald eagle and peregrine falcon.

The Riordan's Well, South Egan Range, and Goshute Canyon WSA's have excellent potential for bald eagle sightings.

A few birds 'winter' in eastern Nevada (late November to May). As a transient species wintering in eastern Nevada, bald eagles will utilize tall trees such as white fir and ponderosa pine for roosting sites. These three WSA's do contain scattered stands of tall timber suitable for roosting, however, no roosting sites have been documented within the WSA's.



Within the WSA's involving bald eagles, similar disturbances involving mineral exploration and development would take place under the no wilderness alternative. Because of past mining interest, most of the areas where mineral exploration and development are expected have been previously claimed. Given valid and existing rights, some exploration and development is also anticipated to take place under the all wilderness alternative.

Regardless of wilderness designation, all mineral exploration and development notices and plans submitted under the 3802 or 3809 mining regulations would be reviewed on a case by case basis. Environmental Assessments would be written for the above actions and impacts to T&E species would be analyzed. Mitigating measures and stipulations would be recommended to protect any known habitat that could be adversely affected by mineral activities.

It is not anticipated that any of the mining activities analyzed in this document would adversely affect the bald eagle, as most mining activity occurs during the months in which the birds are not present (May through October).

Another form of disturbance anticipated within the above mentioned WSA's under the no wilderness alternative is vegetation manipulation, either through prescribed burn or mechanical conversion.

These activities would take place before or after the eagles have left the area and are planned for pinyon-juniper woodlands only, in the lower elevations. Stands of scattered tall timber in the higher elevations would not be affected by any of the above actions. It is the BLM's policy that conifers such as white fir and ponderosa pine not be removed because of their scarcity, importance to wildlife including bald eagles, and aesthetic values. Most stands of ponderosa pine within eastern Nevada are considered to be genetic pools and are preserved as seed sources.

The peregrine falcon is the other endangered species with potential of occurring in these WSA's. Although numbers of the peregrine falcon are not well documented in eastern Nevada, there is potential for sightings in any of the WSA's at any time of the year.

The peregrine falcons are primarily a cliff nesting species and generally feed on smaller shore birds, passerine birds, and waterfowl. The South Egan Range WSA has excellent potential habitat for these falcons, while the remaining WSA's also offer good habitat.

The remote, inaccessible nature of potential falcon habitat in the high cliff areas of the WSA's provide nearly complete protection from man's disturbances. Also, the geologic formations which comprise potential habitat for the peregrine are not recognized as target areas for mineral exploration or extraction, therefore, disturbances from proposed mining activity would not deter the peregrine from utilizing suitable habitats within the WSA's.

Although the bald eagle and peregrine falcon may be sighted in certain WSA's, there are no documented roosting sites for the bald eagles or nesting sites for the peregrine falcon. In any of the actions or activities analyzed in this document, the needs of these birds would be considered under any of the alternatives on a case by case basis and they would be monitored and managed as endangered species, regardless of wilderness designation.

Several Category 3C plant species have been identified in or near several of the WSA's. Standard policy is to monitor and manage these state-listed sensitive species and their habitats so as to prevent any of these species from declining to threatened or endangered status. Thus, under any alternative, these species would be afforded consideration and protection. The issue of impacts to T&E species was, therefore, dropped from further analysis.

A Class 1 sensitive species, the Bonneville cutthroat trout is discussed as a separate issue pertaining to a specific WSA (see Issue Number 7, Issues for Analysis).

12. Impacts on Soil Erosion. It is not expected that the rate of soil erosion occurring from casual or unregulated uses would vary as a result of wilderness designation or nondesignation. Prior to surface disturbing activities such as mineral and energy exploration, range developments, etc., an environmental assessment would be prepared and possible impacts on soil erosion would be considered and mitigated as necessary. Therefore, the issue of impacts on soil erosion was dropped from further consideration since the impacts would be approximately the same under all the alternatives.

#### Development of Alternatives

Development of the proposed actions is guided by requirements of the Bureau's Planning Regulations, 43 Code of Federal Regulations (CFR), part 1600. The BLM's Wilderness Study Policy (Federal Register February 3, 1982) supplements the planning regulations by providing the specific factors to be considered in developing suitability recommendations during the planning sequence.

The proposed actions recommend as suitable for wilderness designation those WSA's, or portions of WSA's, with high quality wilderness values. Under the proposed actions, 107,035 acres would be recommended suitable for wilderness designation. This acreage includes 22,225 acres of the Goshute Canyon WSA, 47,268 acres of the Park Range WSA, and 37,542 acres of the Riordan's Well WSA. The entire South Egan Range WSA would be recommended unsuitable for wilderness designation.

Alternatives to the Proposed Action Selected for Analysis

The BLM Wilderness Study Policy calls for the formulation and evaluation of alternatives ranging from resource protection to resource production. The alternatives assessed in this EIS include: (1) an all wilderness alternative for each WSA; (2) a no wilderness alternative for each WSA and; (3) two partial wilderness alternatives for Goshute Canyon, South Egan Range, and Riordan's Well WSA's; and one partial wilderness alternative for the Park Range.

One of the partial wilderness alternatives for the Riordan's Well WSA, Partial Wilderness Alternative No. 2, includes 2,405 acres located outside of the WSA in the suitable recommendation. This was done following criteria in the Wilderness Study Policy which allows for the inclusion of acreage outside of the WSA in the suitability recommendation when done to enhance the manageability of the area.

In this document, the no action alternative, as required by the National Environmental Policy Act, and the no wilderness alternative are equivalent. Both propose continuation of management as outlined in the existing RMP and recommend the WSA's as nonsuitable for wilderness.

The all wilderness alternative represents the maximum possible acreage that could be recommended as suitable for wilderness designation.

Partial wilderness alternatives are used to analyze suitable or nonsuitable recommendations ranging between the all wilderness and no wilderness alternatives.

TABLE 3  
ALTERNATIVES ANALYZED

<u>Goshute Canyon</u>	NV-040-015	<u>Suitable Acreage</u>
Proposed Action -	Partial Wilderness Alternative No. 1	22,225
	All Wilderness Alternative	35,594
	Partial Wilderness Alternative No. 2	26,436
	No Wilderness Alternative	0
<u>Park Range</u>	NV-040-154	
Proposed Action -	All Wilderness Alternative	47,268
	Partial Wilderness Alternative No. 1	38,573
	No Wilderness Alternative	0
<u>Riordan's Well</u>	NV-040-166	
Proposed Action -	Partial Wilderness Alternative No. 1	37,542
	All Wilderness Alternative	57,002
	Partial Wilderness Alternative No. 2	45,791
	No Wilderness Alternative	0
<u>South Egan Range</u>	NV-040-168	
Proposed Action -	No Wilderness Alternative	0
	All Wilderness Alternative	96,916
	Partial Wilderness Alternative No. 1	57,660
	Partial Wilderness Alternative No. 2	16,560

Alternatives Considered But Dropped From Further Analysis

## Goshute Canyon WSA

A partial alternative was raised by the public for the Goshute Canyon WSA which was a combination of the Preferred Alternative and the Wilderness Emphasis Alternative from the Wilderness Technical Report, totaling 28,600 acres. It was referred to as the Conservationist's Alternative. This alternative was not considered separately, as two similar partial alternatives were already considered.

The Goshute Canyon Natural Area/Instant Study Area comprises 7,650 acres. A total of 5,009 acres of this area is contained within the Goshute Canyon WSA. The remaining 2,641 acres of the Natural Area, located outside of the WSA, were found to lack wilderness characteristics when reviewed on their own merit and were, therefore, not carried further into the analysis. The 5,009 acres of the Natural Area within the Goshute Canyon WSA are fully covered in the analysis in this document. A separate analysis for the Goshute Canyon Natural Area was not considered necessary and was dropped from further consideration.

## Park Range WSA

The Preferred Alternative for the Park Range (46,831 acres suitable, 437 acres unsuitable) from the draft document has been dropped. The alternative was formulated to exclude a 437 acre crested wheatgrass seeding along the WSA's western boundary. After reevaluation it appears the seeding within the WSA is only 40 acres and is not unnatural enough to warrant excluding it from the Proposed Action (All Wilderness) in this document.

In addition, the Wilderness De-emphasis Alternative for the Park Range (34,042 acres suitable and 13,226 acres unsuitable) from the draft document was dropped. This alternative, 4,531 acres less than the Wilderness Emphasis Alternative, was found to be very similar to the old Wilderness Emphasis Alternative in terms of wilderness values and resource conflicts. Since the Wilderness De-emphasis Alternative does not contain any unique or substantially different values not already analyzed in this document, it was not carried forward for analysis.

## Riordan's Well WSA

A partial alternative was raised by the public for the Riordan's Well WSA which was the Wilderness Emphasis Alternative plus an unidentified 400 acres on the west side. This alternative would have totalled 46,191 acres, and was referred to as the Conservationist's Alternative. Because of its similarity to the Wilderness Emphasis Alternative and the lack of specific identification of the 400 acres, this alternative was not carried further in the analysis.

The Wilderness De-emphasis Alternative for the Riordan's Well WSA (30,363 acres suitable and 26,639 acres unsuitable) from the draft document has been dropped. The Wilderness De-emphasis Alternative, 7,179 acres less than the old Preferred Alternative was found to be very similar to the Preferred Alternative in terms of wilderness values and resource conflicts. Since the Wilderness De-emphasis Alternative does not contain any unique or substantially different values not already analyzed in this document, it was not carried forward for analysis.

## CHAPTER 2

# Proposed Actions and Alternatives

### INTRODUCTION

Since the pattern of future actions within the WSA's cannot be predicted with certainty, assumptions were made to allow the analysis of impacts under the proposed actions and alternatives. These assumptions are the basis of the impacts identified in this EIS. They are not management plans or proposals, but represent feasible patterns of activities which could occur under the alternatives analyzed.

All Mineral and Range Development Maps referred to in this chapter are located in a separate map section between Chapters 3 and 4.

### GOSHUTE CANYON WSA NV-040-015

#### PROPOSED ACTION (Partial Wilderness Alternative No. 1)

The Proposed Action recommends 22,225 acres as suitable for wilderness designation (including 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area) and 13,369 acres as nonsuitable for wilderness designation.

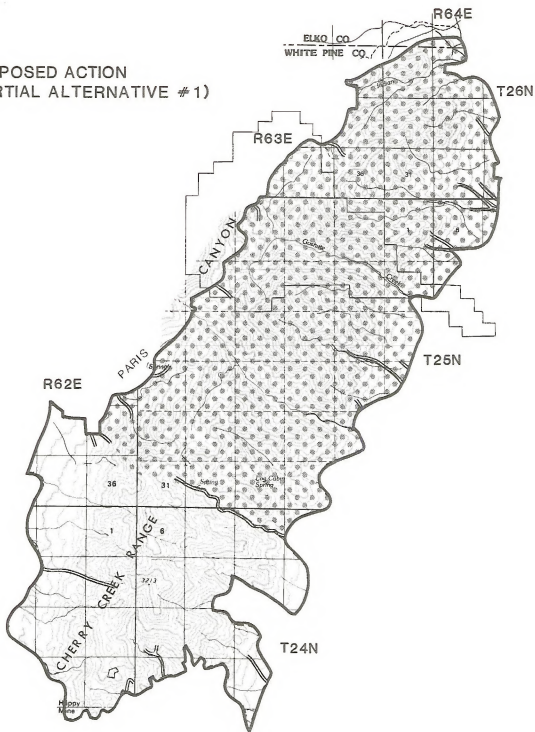
#### Minerals Management Actions

Subject to valid and existing rights, 17,016 acres of the Goshute Canyon WSA would be withdrawn from the mining laws; 5,009 acres are already withdrawn because of the natural area designation, as are 200 acres for the Goshute Cave Geologic Area designation. Also, subject to valid and existing rights, 22,225 acres would be withdrawn from the mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. The remaining 13,369 acres would continue to be open for mineral entry and leasing. As of 1983, 63 mining claims were located within the suitable portion of the WSA and 97 claims were located in the nonsuitable portion.

A total of 63 acres of surface disturbance would result from mineral development.

Four of the former producers within the Cherry Creek Mining District, located in the southern portion of the WSA, which is recommended nonsuitable, are expected to recommence as small underground operations. An estimated 39 acres of surface disturbance would be associated with developing two of the existing mines, including 12 acres of disturbance caused by construction of haul roads to join the properties and 27 acres of

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disturbance associated with stockpiles, dumps, settling ponds, and facility construction. The two remaining operations would involve an estimated 12 acres of surface disturbance each, including 6 acres for settling ponds and dumps, and 6 acres for facility construction.

Exploration for disseminated gold in the west-central portion of the WSA and subsequent development of a heap-leach gold mining operation is not anticipated under this alternative due to a lack of valid and existing claims in the area.

#### Energy Management Actions

Oil and gas potential in the WSA is estimated to be low. Based on current exploration trends, some seismic exploration is anticipated totalling 1 mile of vibroseis lines on the east and west benches in the nonsuitable portion of the WSA. Surface disturbance in the form of visible linear tracks would total 2 acres.

In addition, 5 miles of helicopter portable surface shot geophysical exploration would take place across the nonsuitable southern portion of the WSA on an east-west axis. Surface disturbance from this activity would be negligible. Development is not anticipated on the oil and gas leases within the WSA based on known occurrences of oil and gas potential for the region.

Moderately favorable conditions for geothermal resources exist along the range front fault on the east side, primarily outside of the WSA boundaries. Development of geothermal resources is not anticipated because of more favorable potential to the south in the Monte Neva Known Geothermal Resource Area located outside of the WSA.

#### Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Goshute Canyon WSA. Refer to Appendix C for additional information. Approximately 624 AUM's are currently utilized within the suitable portion of the WSA and 550 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.

Three drift fences totalling 1.75 miles, three spring developments with associated troughs, and one pipeline totalling 3 miles in Log Canyon exist within the suitable portion of the WSA. Vehicular access is common to all of the above range developments because of their location along boundary roads and cherrystemmed routes. The range developments would continue to be maintained with vehicular access even with wilderness designation. Maintenance would be performed, however, under the wilderness protection constraints set forth in the Wilderness Management Policy.

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All of the proposed range developments are located in the Goshute Basin area within the suitable portion of the WSA (refer to Range Projects Map). Four spring sources would be developed and fenced to protect the riparian habitat. Each spring would have water piped to a trough outside of the fenced enclosure. All proposed development of the spring sources and fences would be subject to the wilderness protection constraints set forth in the Wilderness Management Policy, as applied to construction and maintenance.

### Woodland Products Management Actions

The 22,225-acre suitable portion of the Goshute Canyon WSA would not be available as a Christmas tree or fuelwood cutting area for private use or commercial sales.

In the 13,369-acre nonsuitable portion, 130 acres along the southwest boundary of the WSA would be designated as a commercial cutting area for Christmas trees and fuelwood. Approximately 390 Christmas trees would be cut every 6 years and approximately 780 cords of fuelwood would be cut in the long term. About 1 mile of a primitive two-track vehicle route would be created as a result of the cutting.

### Recreation Management Actions

The 22,225-acre suitable portion of the Goshute Canyon WSA would be closed to recreational ORV use where approximately 211 visitor days of ORV use are estimated to occur annually. Vehicular use would continue along the boundary roads and along 7 miles of cherrystemmed routes. The 13,369-acre nonsuitable portion of the WSA would continue to be open to ORV use. A cave management plan would be prepared for Goshute Cave located in the suitable portion of the WSA. Surface disturbing actions are not anticipated with this plan.

### Threatened and Endangered Species Management Actions

Management of the Bonneville cutthroat trout habitat would be coordinated with implementation of the Goshute Basin Allotment Management Plan and the revision of the Goshute Creek Habitat Management Plan. These plans would include actions to help protect the Bonneville cutthroat trout (Class 1 T&E) which has been introduced into Goshute Creek. No impacts to wilderness resources are anticipated.

Actions would include maintenance of the upper gabion structure in Goshute Creek. Maintenance would be accomplished on foot because of the impracticality of vehicular access. Other watershed stabilization projects may be implemented ranging from willow waddling along the banks to construction of more erosion control structures. Changes may also occur in the type and duration of livestock grazing in the Goshute Basin watershed area.

The Wilderness Management Policy states:

Certain permanent installations to maintain conditions for wildlife and fish, upon consideration of their design, placement, duration, and use may be permitted if the resulting change is compatible with preservation of wilderness character and is consistent with wilderness management objectives for the area, and if the installations are the minimum necessary to accomplish the task.

## ALL WILDERNESS ALTERNATIVE

The All Wilderness Alternative recommends the entire 35,594-acre area as suitable for wilderness designation including 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area.

### Minerals Management Actions

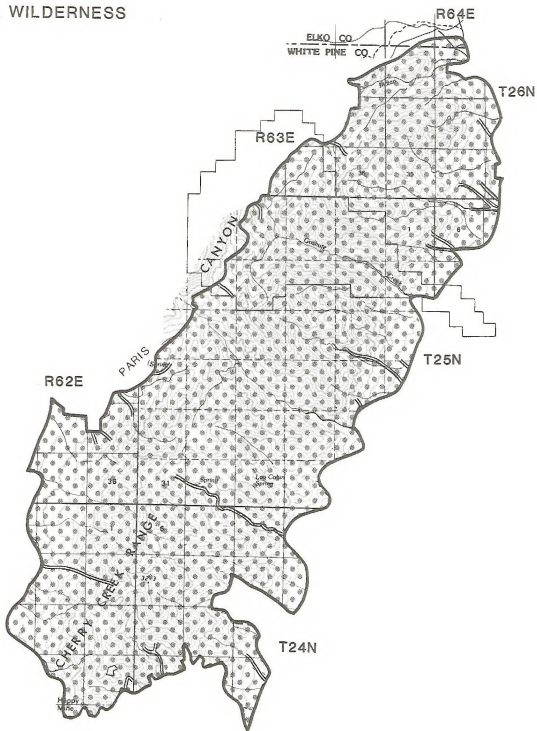
Subject to valid and existing rights, 30,385 acres of the Goshute Canyon WSA would be withdrawn from the mining laws; 5,009 acres are already withdrawn because of the natural area designation, as are 200 acres for the Goshute Cave Geologic Area designation. Also, subject to valid and existing rights, 35,594 acres would be withdrawn from the mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. As of 1983, 160 mining claims were located in the WSA.

A total of 24 acres of surface disturbance would result from mineral development within the WSA.

Four of the former producers within the Cherry Creek Mining District, located in the southern portion of the WSA are expected to recommence as small underground operations. An estimated 16 acres of surface disturbance would be associated with developing two of the existing mines, including 6 acres of disturbance caused by construction of haul roads to join the properties and 10 acres of disturbance associated with stockpiles and dumps. Portions of the haul road, settling ponds, and support facilities would be located outside of the WSA boundary. The two remaining operations would involve an estimated 4 acres of surface disturbance each, including stockpiles and dumps. Settling ponds and support facilities would occur outside of the WSA. Prior to approval of the plan of operations, mitigating measures would be adopted to minimize impacts to the wilderness resource.

Exploration for disseminated gold in the west-central portion of the WSA and subsequent development of a heap-leach gold operation is not anticipated under this alternative because of a lack of valid and existing claims in the area.

 ALL WILDERNESS



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Energy Management Actions

Oil and gas potential within the WSA is estimated to be low. Based on current exploration and development trends, no development is expected to take place on the existing oil and gas leases within the WSA.

Moderately favorable conditions for geothermal resources exist along the range front fault on the east side, primarily outside of the WSA boundary. Development of geothermal resources is not anticipated because of more favorable potential to the south in the Monte Neva Known Geothermal Resource Area located outside of the WSA.

Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Goshute Canyon WSA. Refer to Appendix C for additional information. Approximately 1,174 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

Three drift fences totalling 1.75 miles, three spring developments with associated troughs, and two pipelines totalling 4.5 miles in Carlson and Log Canyons exist within the WSA. Vehicular access is common to all of the above range developments because of their location along boundary roads and cherrystemmed routes. The range developments will continue to be maintained with vehicular access even with wilderness designation. Maintenance would be performed, however, under the wilderness protection constraints set forth in the Wilderness Management Policy.

Proposed range developments are located in the Goshute Basin area of the WSA (refer to Range Projects Map). Four spring sources would be developed and fenced to protect the riparian habitat. Each spring would have water piped to a trough outside of the fenced enclosure. All proposed development of the spring sources and fences would be subject to the wilderness protection constraints set forth in the Wilderness Management Policy, as applied to construction and maintenance.

Woodland Products Management Actions

No portions of the Goshute Canyon WSA would be available for Christmas tree or fuelwood cutting areas for either private use or commercial sales.

Recreation Management Actions

The entire Goshute Canyon WSA would be closed to recreational ORV use. Approximately 320 visitor days of ORV use are estimated to occur annually. Vehicular use would continue along the boundary roads and the 13 miles of cherrystemmed routes. A cave management plan for Goshute Cave will be prepared. Surface disturbing actions are not anticipated with this plan.

Threatened and Endangered Species Management Actions

Management of the Bonneville cutthroat trout habitat would be coordinated with implementation of the Goshute Basin Allotment Management Plan and the revision of the Goshute Creek Habitat Management Plan. These plans would include actions to help protect the Bonneville cutthroat trout (Class 1 T&E) which has been introduced into Goshute Creek. No impacts to wilderness resources are anticipated.

Actions would include maintenance of the upper gabion structure in Goshute Creek. Maintenance would be accomplished on foot because of the impracticality of vehicular access. Other watershed stabilization projects may be implemented ranging from willow waddling along the banks to construction of more erosion control structures. Changes may also occur in the type and duration of livestock grazing in the Goshute Basin watershed area.

The Wilderness Management Policy states:

Certain permanent installations to maintain conditions for wildlife and fish, upon consideration of their design, placement, duration, and use may be permitted if the resulting change is compatible with preservation of wilderness character and is consistent with wilderness management objectives for the area, and if the installations are the minimum necessary to accomplish the task.

**PARTIAL WILDERNESS ALTERNATIVE NO. 2**

The Partial Wilderness Alternative No. 2 recommends 26,436 acres (including 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area) as suitable for wilderness designation and 9,158 acres unsuitable for wilderness designation.

Minerals Management Actions

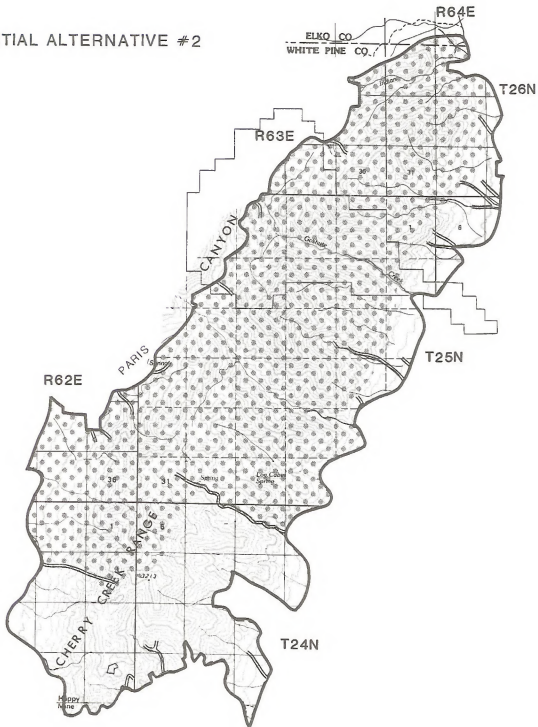
Subject to valid and existing rights, 21,227 acres of the Goshute Canyon WSA would be withdrawn from the mining laws; 5,009 acres are already withdrawn because of the natural area designation, as are 200 acres for the Goshute Cave Geologic Area designation. Also, subject to valid and existing rights, 26,436 acres would be withdrawn from the mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. The remaining 9,158 acres would continue to be open for mineral entry and leasing. As of 1983, 64 mining claims were located within the suitable portion and 96 in the unsuitable portion.

A total of 63 acres of surface disturbance would result from mineral development.





PARTIAL ALTERNATIVE #2



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Four of the former producers within the Cherry Creek Mining District, located in the southern portion of the WSA which is recommended nonsuitable are expected to recommence as small underground operations. An estimated 39 acres of surface disturbance would be associated with developing two of the existing mines, including 12 acres of disturbance caused by construction of haul roads to join the properties and 27 acres of disturbance associated with stockpiles, dumps, settling ponds, and facility construction. The two remaining operations would involve an estimated 12 acres of surface disturbance each, including 6 acres for settling ponds and dumps, and 6 acres for facility construction.

Exploration for disseminated gold in the west-central portion of the WSA and subsequent development of a heap-leach gold operation is not anticipated under this alternative because of a lack of valid and existing claims in the area.

#### Energy Management Actions

Oil and gas potential in the WSA is estimated to be low. Based on current exploration trends, some seismic exploration is anticipated totalling 2 miles of vibroseis lines on the east and west benches in the nonsuitable portion of the WSA. Surface disturbance in the form of visible linear tracks would total 4 acres.

In addition, 5 miles of helicopter portable surface shot geophysical exploration would take place across the nonsuitable southern portion of the WSA on an east-west axis. Surface disturbance from this activity would be negligible.

Development is not anticipated on the oil and gas leases within the WSA based on known occurrences of oil and gas potential for the region.

Moderately favorable conditions for geothermal resources exist along the range front fault on the east side, primarily outside of the WSA boundaries. Development of geothermal resources is not anticipated because of more favorable potential to the south in the Monte Neva Known Geothermal Resource Area.

#### Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Goshute Canyon WSA. Refer to Appendix C for additional information. Approximately 663 AUM's are currently utilized within the suitable portion of the WSA and 511 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.



One drift fence .5 miles long, three spring developments with associated troughs, and one pipeline totalling 4.5 miles in Carlson and Log Canyons exist within the suitable portion of the WSA. Vehicular access is common to all of the above range developments because of their location along boundary roads and cherrystemmed routes. The range developments would continue to be maintained with vehicular access even with wilderness designation. Maintenance would be performed, however, under the wilderness protection constraints set forth in the Wilderness Management Policy.

All of the proposed range developments are located in the Goshute Basin area within the suitable portion of the WSA (refer to Range Projects Map). Four spring sources would be developed and fenced to protect the riparian habitat. Each spring would have water piped to a trough outside of the fenced enclosure. All proposed development of the spring sources and fences would be subject to the wilderness protection constraints set forth in the Wilderness Management Policy, as applied to construction and maintenance.

#### Woodland Products Management Actions

The 26,436-acre suitable portion of the Goshute Canyon WSA would not be available for Christmas tree or fuelwood cutting either for private use or commercial sales.

In the nonsuitable portion, 60 acres along the southwest boundary of the WSA would be designated as a commercial Christmas tree and fuelwood sale area. Approximately 180 trees would be cut every 6 years and approximately 360 cords of fuelwood would be cut in the long term.

#### Recreation Management Actions

The 26,436 acre suitable portion of the Goshute Canyon WSA would be closed to recreational ORV use where approximately 240 visitor days of ORV use are expected to occur annually. Vehicular use would continue along the boundary roads and along 3.5 miles of cherrystemmed routes. The 9,158-acre nonsuitable portion would continue to remain designated as open to ORV use. A cave management plan would be prepared for Goshute Cave located in the suitable portion of the WSA. Surface disturbing actions are not anticipated with this plan.

#### Threatened and Endangered Species Management Actions

Management of the Bonneville cutthroat trout habitat would be coordinated with implementation of the Goshute Basin Allotment Management Plan and the revision of the Goshute Creek Habitat Management Plan. These plans would include actions to help protect the Bonneville cutthroat trout (Class 1 T&E) which has been introduced into Goshute Creek.

Actions would include maintenance of the upper gabion structure in Goshute Creek. Maintenance would be accomplished on foot because of the impracticality of vehicular access. Other watershed stabilization projects may be implemented ranging from willow wadding along the banks to construction of more erosion control structures. Changes may also occur in the type and duration of livestock grazing in the Goshute Basin watershed area.

The Wilderness Management Policy states:

Certain permanent installations to maintain conditions for wildlife and fish, upon consideration of their design, placement, duration, and use may be permitted if the resulting change is compatible with preservation of wilderness character and is consistent with wilderness management objectives for the area, and if the installations are the minimum necessary to accomplish the task.

## NO WILDERNESS ALTERNATIVE

The No Wilderness Alternative recommends the entire 35,594-acre WSA as nonsuitable for wilderness designation, including the 5,009 acres of the Goshute Canyon Natural Area/Instant Study Area.

### Minerals Management Actions

Under this alternative, the entire WSA would remain open for mineral entry and leasing with the exception of 5,009 acres in the Goshute Canyon Natural Area/ISA and the Goshute Cave Geologic area which would remain withdrawn from the mining laws. Validity exams would not be required prior to development. As of 1983, 160 mining claims were located in the WSA.

A total of 92 acres of surface disturbance would result from mineral exploration and development.

Four of the former producers within the Cherry Creek Mining District, located in the southern portion of the WSA are expected to recommence as small underground operations. An estimated 39 acres of surface disturbance would be associated with developing 2 of the existing mines, including 12 acres of disturbance caused by construction of haul roads to join the properties and 27 acres of disturbance associated with stockpiles, dumps, settling ponds, and facility construction. The 2 remaining operations would involve an estimated 12 acres of surface disturbance each, including 6 acres for settling ponds and dumps, and 6 acres for facility construction.

Due to favorable lithologies in the west-central portion of the WSA, increased exploration for disseminated gold deposits is anticipated. This activity would lead to the development of a modest heap-leach operation totalling 37 acres of disturbance.

Surface disturbance associated with exploration would total approximately 8 acres, involving access, drill pad construction, and trenching. Development of a 29-acre open-pit heap-leach operation would involve 12 acres of surface disturbance for the open pit (consuming 5 acres of existing disturbance from previous exploration), 10 acres for waste dumps, and 12 acres for leach pads, solution ponds, and processing facilities.

#### Energy Management Actions

Oil and gas potential in the WSA is estimated to be low. Based on current exploration trends, some seismic exploration is anticipated totalling 3 miles of vibroseis lines on the east and west benches of the WSA. Surface disturbance in the form of visible linear tracks would total 6 acres.

In addition, 10 miles of helicopter portable surface shot geophysical exploration would take place across the WSA on an east-west axis. Surface disturbance from this activity would be negligible.

Development is not anticipated within the WSA based on known occurrences of oil and gas potential for the region.

Moderately favorable conditions for geothermal resources exist along the range front fault on the east side, primarily outside of the WSA boundaries. Development of geothermal resources is not anticipated because of more favorable potential to the south in the Monte Neva Known Geothermal Resource Area located outside the WSA.

#### Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Goshute Canyon WSA. Refer to Appendix C for additional information. Approximately 1,174 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

Three drift fences totalling 1.75 miles, three spring developments with associated troughs, and two pipelines totalling 4.5 miles in Carlson and Log Canyons exist within the WSA. Vehicular access is common to all of the above range developments due to their location along boundary roads and cherrystemmed routes. The range developments will continue to be maintained with vehicular access.

Range developments proposed would involve developing five spring sources within the Goshute Basin Allotment. The spring sources would be fenced to protect the riparian habitat and water would be piped to troughs outside the fenced enclosure. In addition, a vegetation enhancement project would involve spraying with herbicide, 5 acres of wyethia-choked meadows to stimulate regrowth of grasses.

TABLE 4

## SUMMARY OF IMPACTS - GOSHUTE CANYON

IMPACT TOPIC	PROPOSED ACTION	ALL WILDERNESS
WILDERNESS VALUES	The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, special geologic features, stands of bristlecone pine, and Bonneville cutthroat trout habitat. Long-term negative impacts would occur in the nonsuitable portion of the WSA on approximately 200 acres. The remaining 13,158 nonsuitable acres would retain their wilderness values.	The result of designation of the 35,594-acre Goshute Canyon WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; the special geologic features, highly scenic values, stands of bristlecone pine, and the Bonneville cutthroat trout habitat.
EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES	Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.	Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 92 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 24 acres within the suitable portion if designation occurs. A small heap-leach operation would not occur due to lack of valid and existing claims.
EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES	Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA and development of these resources is not expected to take place. There would be no impacts on the exploration or development of energy resources within the nonsuitable portion of the WSA.	All lands within the WSA would be withdrawn from mineral leasing. Geophysical exploration totalling 13 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and exploration and development is not expected to take place.
GRAZING FACILITY MAINTENANCE & CONSTRUCTION	There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the suitable portion of the WSA as a result of tighter wilderness restrictions. There would be no impacts to grazing facility construction within the nonsuitable portion.	There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the WSA as a result of tighter wilderness restrictions.
WOODLAND PRODUCTS HARVEST	The harvest of 60 fir Christmas trees every 6 years within the suitable portion of the WSA would be foregone. This would be a very minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.	The harvest of 450 Christmas trees every 6 years and 780 cords of fuelwood would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand.
RECREATIONAL OFF-ROAD USE	Recreational ORV use of 211 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.	Recreational ORV use of 320 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.
BONNEVILLE CUTTHROAT TROUT HABITAT	There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.	There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

PARTIAL WILDERNESS NO. 2	NO WILDERNESS	IMPACT TOPIC
<p>The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, special geologic features, stands of bristlecone pine, and Bonneville cutthroat trout habitat. Long-term negative impacts would occur in the nonsuitable portion of the WSA on approximately 130 acres. The remaining 9,028 nonsuitable acres would retain their wilderness values.</p>	<p>Long-term physical impairment to the wilderness qualities of the Goshute Canyon WSA would occur on approximately 260 acres in the southern and western portions of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values within the WSA would not be impaired. The geologic features, bristlecone pine stands and Bonneville cutthroat trout habitat would not be affected by a no wilderness designation. The remaining 35,334 acres would retain their wilderness values.</p>	<p>WILDERNESS VALUES</p>
<p>Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.</p>	<p>All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources.</p>	<p>EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES</p>
<p>Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.</p>	<p>All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.</p>	<p>EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES</p>
<p>There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the suitable portion of the WSA as a result of tighter wilderness restrictions. There would be no impacts to grazing facility construction within the nonsuitable portion.</p>	<p>There would be no impacts on grazing facility maintenance and construction.</p>	<p>GRAZING FACILITY MAINTENANCE &amp; CONSTRUCTION</p>
<p>The harvest of 270 Christmas trees every 6 years and 420 cords of fuelwood and commercial sales of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.</p>	<p>There would be no impacts on woodland products harvest.</p>	<p>WOODLAND PRODUCTS HARVEST</p>
<p>Recreational ORV use of 240 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.</p>	<p>There would be no impacts on recreational ORV use.</p>	<p>RECREATIONAL OFF-ROAD USE</p>
<p>There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.</p>	<p>There would be no impact to the Bonneville cutthroat trout habitat. Management would be slightly easier because stabilization projects would not have to meet the wilderness criteria in the Wilderness Management Policy.</p>	<p>BONNEVILLE CUTTHROAT TROUT HABITAT</p>

## GOSHUTE CANYON

The final decision as to which projects would be developed would be determined following the preparation of an environmental assessment for each project.

### Woodland Products Management Actions

A 130-acre area along the southwest boundary of the WSA would be designated as a commercial Christmas tree and fuelwood sale area. Approximately 390 trees would be cut every 6 years and approximately 780 cords of fuelwood would be cut in the long term. In addition, a 30-acre commercial Christmas tree sale for scattered fir trees in Goshute Basin would be authorized. Approximately 60 trees would be cut every 6 years.

### Recreation Management Actions

The Goshute Canyon WSA would continue to be designated open to ORV use as stated in the Egan Resource Management Plan. A cave management plan would be developed for Goshute Cave. Recreation management would intensify along the mouth of Goshute Canyon and a small primitive recreational camping site would be developed just outside the WSA. Should the White Pine Power Project be constructed nearby, the recreational site would be enlarged based on demands from the increased population base. More intensive ORV management would occur to channel expected ORV increases to less sensitive areas.

### Threatened and Endangered Species Management Actions

Management of the Bonneville cutthroat trout would be coordinated with implementation of the Goshute Basin Allotment Management Plan and the revision of the Goshute Creek Habitat Management Plan. These plans would include actions to help protect the Bonneville cutthroat trout (Class 1 T&E) which has been introduced into Goshute Creek.

Actions would include maintenance of the upper gabion structure in Goshute Creek. Maintenance would be accomplished on foot because of the impracticality of vehicular access. Other watershed stabilization projects may be implemented ranging from willow waddling along the banks to construction of more erosion control structures. Changes may also occur in the type and duration of livestock grazing in the Goshute Basin watershed area.



## PARK RANGE WSA

NV-040-154

### PROPOSED ACTION (All Wilderness Alternative)

The Proposed Action recommends the entire 47,268-acre Park Range WSA as suitable for wilderness designation.

#### Minerals Management Actions

Subject to valid and existing rights, 47,268 acres of the Park Range WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. As of 1983, no mining claims were located in the WSA.

A plan of operations is expected for an exploration program in the northern tip on the WSA would be submitted. Disturbance would consist of approximately 1 acre of minimal access and drill-pad construction. Subject to valid and existing rights, an environmental assessment would be prepared to analyze and minimize impacts to the wilderness resource. Neither development nor production is anticipated as a result of the exploration. Due to unfavorable lithologies neither exploration nor development is expected to take place within the remainder of the WSA.

#### Energy Management Actions

Moderately favorable conditions for geothermal resources exist along the east and west flanks the WSA. The area's remoteness and lack of infrastructure, however, make development unlikely. Refer to the Mineral and Energy Potential Map.

The potential for energy resources (oil, gas) in the Park Range WSA is estimated to be low. Neither exploration for nor production of oil and gas is expected to occur on the oil and gas leases located in the northern tip of the WSA.

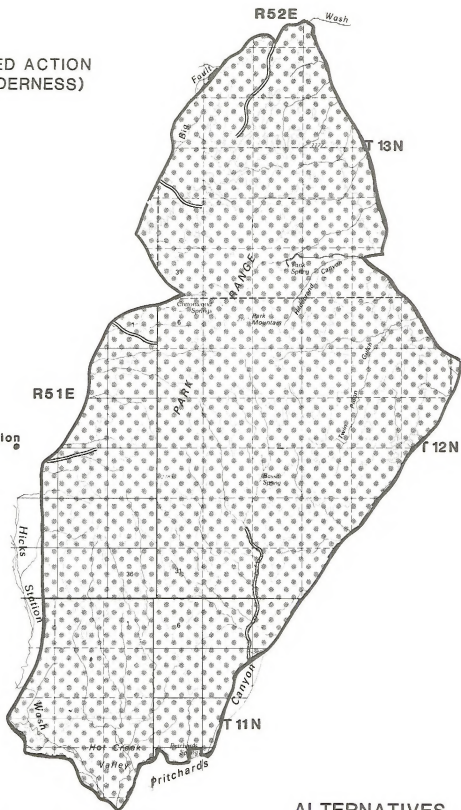
#### Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Park Range WSA. Refer to Appendix C for additional information. Approximately 125 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

Two spring developments, Tank and Cottonwood Springs, are located within the Park Range WSA. Cottonwood Spring has a .5-mile buried pipeline located along a vehicular access route. Routine maintenance would be accomplished by vehicular use where accessible and by persons on foot or horseback where required. Tank Spring has marginal vehicle access and is not regularly maintained. Any future maintenance would be accomplished by persons on foot or horseback.



 PROPOSED ACTION  
(ALL WILDERNESS)



0 1 2 3 4  
approx miles

ALTERNATIVES  
PARK RANGE  
NV-040-154

Forty acres of crested wheatgrass seeding are located along the western boundary of the WSA (refer to Range Projects Map). The seeding would continue to be maintained through the use of appropriate and acceptable methods. Two fences extend into the west side of the WSA. Each fence is 1 mile long and are both cherrystemmed out. Vehicular access would continue to be used for maintenance.

A well proposed on the west side of the WSA would be located slightly to the west, outside of the WSA.

#### Woodland Products Management Actions

The Park Range WSA would not be designated as a cutting area for private or commercial use, nor for commercial pinyon pine nut harvest. No woodland product harvest is anticipated.

#### Recreation Management Actions

The 47,268-acre suitable portion of the Park Range WSA would be closed to recreational ORV use. Because of the WSA's remoteness and minimal amount of past recreational off-road use little ORV use would be displaced. Vehicular use would still continue along the boundary roads and the 7 miles of cherrystemmed routes.

### PARTIAL WILDERNESS ALTERNATIVE NO. 1

The Partial Wilderness Alternative No. 1 recommends 38,573 acres as suitable for wilderness designation and 8,695 acres as nonsuitable for wilderness designation.

#### Minerals Management Actions

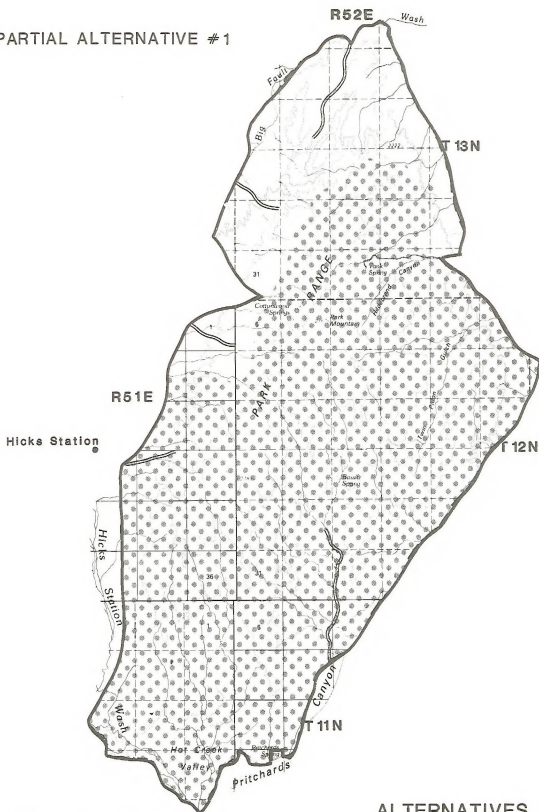
Subject to valid and existing rights, 38,573 acres of the Park Range WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. As of 1983, no mining claims were located in the WSA.

A total of 2 acres of surface disturbance involving road access and drill-pad construction would occur within the nonsuitable portion of the WSA. Disseminated gold would be the target mineral for exploration in the Paleozoic sediments located in the northern tip of the WSA. Neither development nor production is foreseen as a result of exploration.

Because of unfavorable mineral potential within the Tertiary volcanics in the suitable portion of the WSA, exploration, development, and production of mineral resources is not anticipated within the suitable or nonsuitable portions of the WSA.



PARTIAL ALTERNATIVE #1



0 1 2 3 4  
approx miles

ALTERNATIVES  
PARK RANGE  
NV-040-154

### Energy Management Actions

Moderately favorable conditions for geothermal resources exist along the east and west flanks the WSA. The area's remoteness and lack of infrastructure, however, make development unlikely. Refer to the Mineral and Energy Potential Map.

Neither oil nor gas development is expected to occur within the WSA. Oil and gas potential within the WSA is low. Based on current exploration trends some seismic exploration totalling 1½ miles of vibroseis lines is expected on the east side of the WSA in the nonsuitable portion. Surface disturbance in the form of linear tracks is expected to disturb 4 acres.

### Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Park Range WSA. Refer to Appendix C for additional information. Approximately 105 AUM's are currently utilized within the suitable portion of the WSA and 20 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.

Two spring developments, Tank and Cottonwood Springs, exist within the suitable portion of the Park Range WSA. Cottonwood Spring has a .5-mile buried pipeline located along a marginal vehicular access route. Normal maintenance would be accomplished through vehicular use where accessible and by persons on foot or horseback for the remainder. Tank Spring has no vehicle access and is not regularly maintained. Any future maintenance would be accomplished by workers on foot or horseback.

Forty acres of crested wheatgrass seeding are located within the nonsuitable portion of the WSA (refer to Range Projects Map). The seeding would continue to be maintained through the use of appropriate and acceptable methods. Two fences extend into the nonsuitable portion of the WSA for a total distance of 2 miles. Vehicular access would continue to be used for maintenance.

A well proposed on the west side of the WSA would be located slightly to the west, outside of the WSA.

### Woodland Products Management Actions

The 38,573-acre suitable portion of the Park Range WSA would not be designated as a cutting area for private use or commercial sales.

The remaining 8,595 acres of the nonsuitable portion of the WSA would be available for woodland product harvest. Because of the extreme remoteness of the WSA, however, no harvest is anticipated.

## PARK RANGE

### Recreation Management Actions

The 38,573-acre suitable portion of the Park Range WSA would be closed to recreational ORV use. Because of the area's remoteness and minimal amount of past recreational off-road use little ORV use would be displaced. The remaining 8,605 acres of the WSA would remain open as designated in the Egan RMP. Vehicular use would still continue along the boundary roads and the 5 miles of cherrystemmed routes.

### NO WILDERNESS ALTERNATIVE

The No Wilderness Alternative recommends the entire 47,268-acre WSA as nonsuitable for wilderness designation.

### Minerals Management Actions

A total of 2 acres of surface disturbance involving road access and drill-pad construction would occur within the nonsuitable portion of the WSA. Disseminated gold would be the target mineral for exploration in the Paleozoic sediments located in the northern tip of the WSA. No development or production is expected to occur within the Park Range WSA as a result of exploration.

### Energy Management Actions

Moderately favorable conditions for geothermal resources exist along the east and west flanks the WSA. The area's remoteness and lack of infrastructure, however, make development unlikely.

Oil and gas potential within the WSA is low. Based on current exploration trends, some seismic exploration totalling 1.5 miles of vibroseis lines is expected on the east side of the WSA. Surface disturbance in the form of linear tracks is expected to disturb 4 acres. Oil and gas production is not expected to take place within the WSA.

### Range Management Actions

Livestock (cattle and sheep) are grazed in four allotments within the Park Range WSA. Refer to Appendix C for additional information. Approximately 125 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

Two spring developments, Tank and Cottonwood Springs, exist within the Park Range WSA. Cottonwood Spring has a .5-mile buried pipeline located along a vehicular access route. Tank Spring has marginal vehicle access. Maintenance of the two spring developments and pipeline would continue as needed.

TABLE 5

## SUMMARY OF IMPACTS - PARK RANGE

IMPACT TOPIC	PROPOSED ACTION	PARTIAL NO. 1	NO WILDERNESS
WILDERNESS VALUES	The result of designation of the Park Range WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; the pristine mountain meadows, highly scenic values, and the archaeological values.	The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values; pristine mountain meadows, and archaeological values. Long-term negative impacts to the perception of wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 300 acres. The remaining 8,395 unsuitable acres would retain their wilderness values.	Long-term physical impairment to the perception of wilderness qualities of the Park Range WSA would occur on approximately 300 acres in the northern portion of the WSA. Opportunities for solitude and primitive and unconfined recreation would be unaffected. The highly scenic values and other special features within the WSA would not be impaired. The remaining 45,968 acres would retain their wilderness values.
EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES	Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 2 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 1 acre within the suitable portion if designation occurs. Favorability for development of mineral resources is low within the WSA and development of mineral resources is not expected.	Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. Neither exploration nor development of mineral resources is anticipated within the suitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.	All lands within the Park Range WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources.
EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES	All lands within the WSA would be withdrawn from mineral leasing. Geophysical exploration totalling 1.5 miles would be foregone due to tighter wilderness restrictions. Favorability for exploration or development of energy resources is low within the WSA and development is not expected to take place.	Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.	All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.
GRAZING FACILITY MAINTENANCE & CONSTRUCTION	There would be negligible impacts to grazing facility maintenance and construction.	There would be negligible impacts on grazing facility maintenance and construction.	There would be no impacts on grazing facility maintenance and construction.

## RIORDAN'S WELL

Forty acres of crested wheatgrass seeding are located along the western boundary of the WSA (refer to Range Projects Map). The seeding would continue to be maintained. Two fences extend into the west side of the WSA for a total distance of 2 miles. Vehicular access would continue to be used to maintain the fences.

A water well is anticipated to be located within the western boundary of the WSA.

### Woodland Products Management Actions

The entire 47,268-acre nonsuitable portion of the Park Range WSA would be available for woodland product harvest. Because of the extreme remoteness of the WSA's location, however, it is unlikely that any harvest would occur.

### Recreation Management Actions

The entire 47,268-acre WSA would remain open to recreational ORV use as designated in the Egan RMP.

## RIORDAN'S WELL WSA NV-040-166

### PROPOSED ACTION (Partial Wilderness Alternative No. 1)

The Proposed Action recommends 37,542 acres of the Riordan's Well WSA as suitable for wilderness designation and 19,460 acres as nonsuitable for wilderness designation.

### Minerals Management Actions

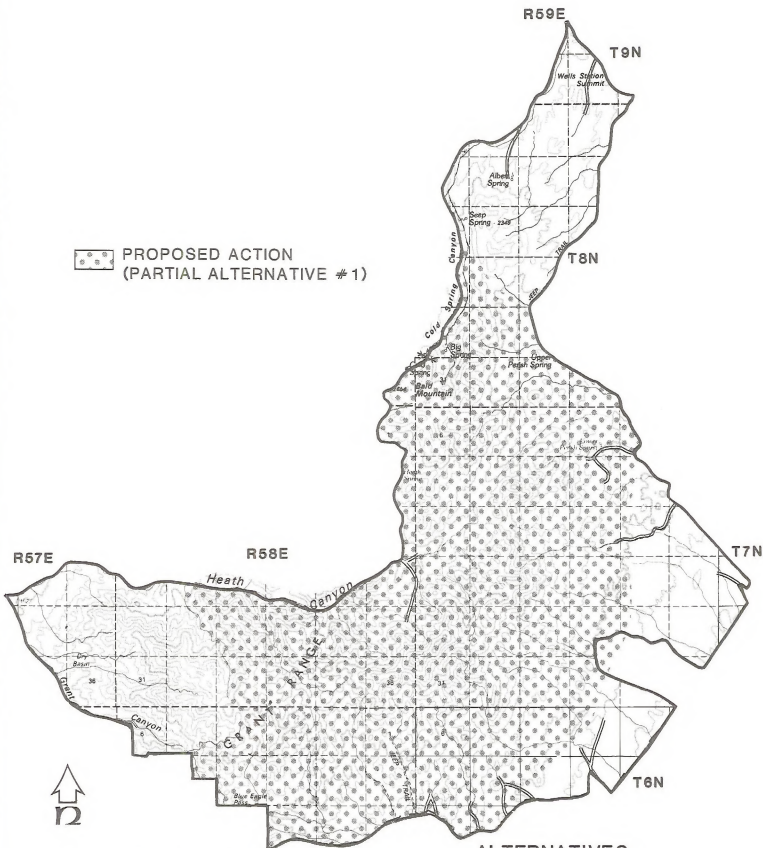
Subject to valid and existing rights, 37,542 acres of the Riordan's Well WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. The remaining 19,460 acres would continue to be open for mineral entry and leasing. As of 1983, 70 mining claims were located within the suitable portion of the WSA and 21 were located in the nonsuitable portion.

Given valid and existing claims prior to designation, some exploration and mineral development is anticipated within the suitable portion of the WSA.

The Troy Mining District is located adjacent to the southwestern corner of the WSA. This district has a recorded production of about \$1 million in gold and a moderate tonnage of tungsten (GEM, 1983).



 PROPOSED ACTION  
(PARTIAL ALTERNATIVE # 1)



ALTERNATIVES  
RIORDAN'S WELL  
NV-040-166

Development of a small underground mining operation is anticipated within the suitable southern portion of the WSA. The mine would utilize three conventional flotation cells to reduce crushed rock to three separate concentrates. In one cell, tin- and tungsten-bearing minerals would be selectively separated from all the other material by chemical or gravimetric means. In the second cell, copper- and gold-bearing minerals would be collected in the same manner by use of different chemicals. In the final cell, lead-, zinc-, and silver-bearing compounds would be collected.

As with other underground operations, most surface disturbances would be attributed to processing facilities rather than actual mining. Within the suitable WSA boundary a total of 8 acres of surface disturbance from this operation would result from a 4-acre waste dump and construction of a haul road. An 8-acre beneficiation complex and 10 acres of tailings ponds, and related facilities would be located in the nonsuitable portion of the WSA, to the south.

A small exploration program targeting disseminated gold deposits in the central portion of the WSA would be accomplished by helicopter portable drill methods. A total of about 1 acre of surface disturbance would result from drilling activities.

A total of 9 acres of surface disturbance is anticipated as a result of mining and mineral exploration activities within the suitable portion of the WSA.

Within the nonsuitable portion of the WSA, exploration efforts in the northern portion of the WSA would intensify targeting low-grade, large tonnage disseminated gold and silver deposits. Two distinct exploration programs would include drill access construction, drill pads, and trenching. The largest exploration program in the north would disturb a total of 10 acres and the other northern program would disturb 6 acres.

Exploration activities within the nonsuitable portion of the WSA would disturb a total of 16 acres.

#### Energy Management Actions

Potential for oil and gas discovery is considered low (GEM, 1983). The producing oil wells in Railroad Valley lie just outside of the WSA to the west. All production is presently limited to the valley floor. Interest in the WSA is expected to continue resulting in seismic lines and two wildcat wells, totalling 22 acres of surface disturbance within the nonsuitable portion.

Based on current exploration trends, 6 miles of cumulative seismic line within the southeast bench of the WSA would result in 12 acres of surface disturbance in the form of visible linear tracks within the nonsuitable portion of the WSA.

In addition, two wildcat wells, one on the western tip of the nonsuitable portion of the WSA and the other on the east bench (also in the nonsuitable portion) would be drilled. Each well would result in the clearing of a 3-acre pad and 2 acres for access.

Geophysical and oil and gas exploration is not expected to take place within the suitable portion of the WSA.

Geothermal potential for the WSA is low. Potential may exist outside the WSA for geothermal development, but development inside the WSA is not anticipated.

#### Range Management Actions

Livestock (cattle) are grazed in four allotments within the Riordan's Well WSA. Refer to Appendix C for additional information. Approximately 250 AUM's are currently utilized within the suitable portion of the WSA and 250 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.

With the exception of a .25-mile fence in the nonsuitable northern portion, all existing range developments have been cherrystemmed from the WSA. These cherrystemmed projects include 2-mile and .25-mile sections of drift fences, and two spring developments, one with a .5-mile section of pipeline. Current maintenance would continue on all these developments.

Proposed range projects which would be constructed in the suitable portion of the Riordan's Well WSA include the development of Upper Perish Spring and a .5-mile portion of the Lower Perish Spring pipeline. A 2-mile pipeline from Upper Perish Spring which would be located entirely outside of the WSA boundary would also be built.

The proposed spring development and pipeline would be subject to the wilderness protection constraints set forth in the Wilderness Management Policy, as applied to construction and maintenance. Maintenance of the spring and pipeline would be by vehicular access along existing roads.

A proposed allotment boundary fence which would lie within both the suitable and nonsuitable portions of the WSA would not be allowed.

The remaining 2-mile section of the Lower Perish Spring pipeline would be built in the nonsuitable portion of the WSA. In the southern portion of the WSA, two fenced crested wheatgrass seedings totalling 9,700 acres are proposed. The 4,600 acres of seeding proposed within the suitable portion of the WSA would not be allowed. The remaining 5,100 acres of fenced seeding within the nonsuitable portion would be allowed.

## RIORDAN'S WELL

Proposed range developments located entirely within the nonsuitable portion include development of seep spring and a livestock well in Dry Basin, a 1,500-acre chaining of pinyon-juniper woodland located in the northern end of the WSA with an associated well. Both of these projects as well as the 5,100 acres of fenced seeding mentioned above, would be accomplished. Refer to the Range Projects Map.

### Woodland Products Management Actions

The 37,542-acre suitable portion of the Riordan's Well WSA would not be available as a cutting area for private or commercial use, nor for commercial pinyon pine nut harvest. Some of the post and pole sales that were anticipated without wilderness designation would not occur.

In the northern nonsuitable portion of the WSA, a salvage fuelwood sale would be associated with a 1,500-acre proposed chaining. The sale could occur either before or after the chaining and approximately 8,100 cords would be harvested.

Along the nonsuitable portion of the northeast and northwest boundaries of the WSA, post and pole sales would occur. Approximately 600 posts and poles would be harvested on the east side of the WSA and 800 on the west.

Commercial pinyon pine nut sales based on nut crop availability would take place in accessible areas in the nonsuitable portion of the WSA.

### Recreation Management Actions

The 37,542-acre suitable portion of the Riordan's Well WSA would be closed to recreational ORV use. Approximately 122 visitor days of ORV use are estimated to occur annually in this suitable area. Vehicular use would continue along the boundary roads and the 4.5 miles of cherrystemmed routes. The 19,460-acre nonsuitable portion would be managed as open for recreational ORV use.

## ALL WILDERNESS ALTERNATIVE

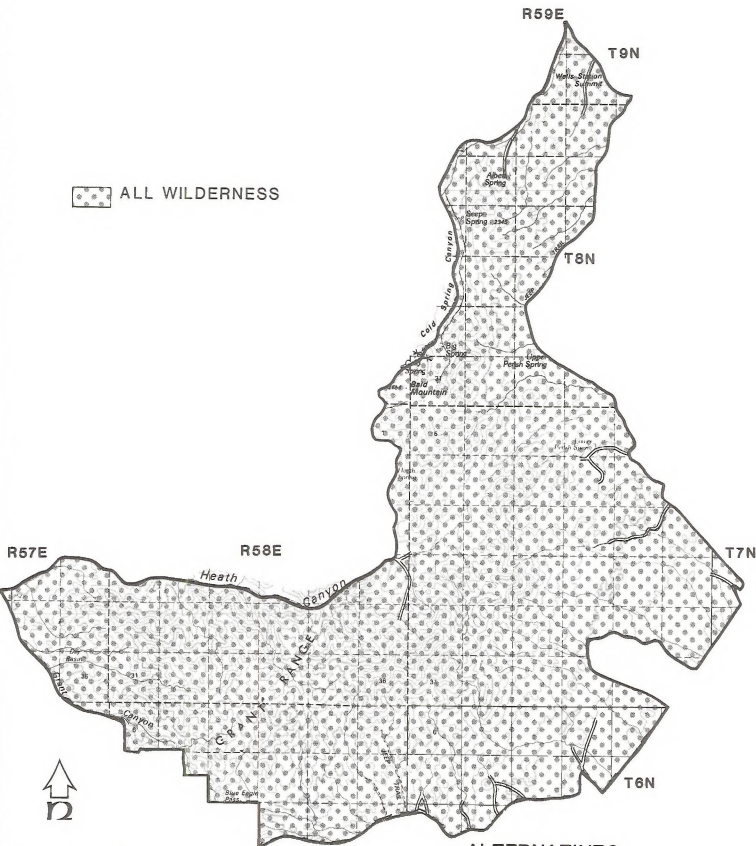
The All Wilderness Alternative recommends the entire 57,002-acre area as suitable for wilderness designation.

### Minerals Management Actions

Subject to valid and existing rights, 57,002 acres of the Riordan's Well WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. As of 1983, 91 mining claims were located within the WSA.

Given valid and existing claims prior to designation, some exploration and mineral development is expected to occur within the WSA.

 ALL WILDERNESS



ALTERNATIVES  
RIORDAN'S WELL  
NV-040-166

The Troy Mining District is located adjacent to the southwestern corner of the WSA. This district has a recorded production of about \$1 million in gold and a moderate tonnage of tungsten (GEM, 1983).

Development of a small underground mining operation is foreseen within the southern portion of the WSA. The mine would utilize three conventional flotation cells to reduce crushed rock to three separate concentrates. In one cell, tin- and tungsten-bearing minerals would be selectively separated from all other material by chemical or gravimetric means. In the second cell, copper- and gold-bearing minerals would be collected in the same manner by use of different chemicals. In the final cell, lead-, zinc-, and silver-bearing compounds would be collected.

As with other underground operations, most surface disturbance would be attributed to processing facilities rather than actual mining. Within the WSA boundary a total of 8 acres of surface disturbance from this operation would result from a 4-acre waste dump and construction of a haul road. A beneficiation complex, tailings pond, and related facilities would be located to the south outside of the WSA boundary.

A small exploration program targeting disseminated gold deposits in the central portion of the WSA would be accomplished by helicopter portable drill methods. A total of about 1 acre of surface disturbance would result from drilling activities.

Exploration efforts in the northern portion of the WSA would intensify targeting low-grade, large tonnage disseminated gold and silver deposits. Two distinct exploration programs would include minimal drill access construction and drill pads. Trenching would not be allowed. The largest exploration program in the north would disturb a total of 4 acres and the other northern program would disturb 2 acres.

A total of 15 acres of surface disturbance is anticipated as a result of mining and mineral exploration activities within the WSA.

#### Energy Management Actions

Potential for oil and gas discovery is considered low (GEM, 1983). The producing oil wells in Railroad Valley lie just outside of the WSA to the west. All production is presently limited to the valley floor. Interest in the WSA is expected to continue resulting in seismic exploration and two wildcat wells for a total of 10 acres of surface disturbance.

Geophysical (seismic) exploration would be limited to existing roads and trails resulting in no additional surface disturbance.

In addition, two wildcat wells, one on the western tip of the WSA and the other on the east bench, would be drilled on existing leases. Each well would result in the clearing of a 3-acre pad and 2 acres of surface disturbance for access construction. Development of oil and gas resources is not expected as a result of exploration. All disturbed areas would be reclaimed as stipulated under the Wilderness Management Policy.



Geothermal potential for the WSA is low. Potential may exist outside the WSA for geothermal development, but development inside the WSA is not anticipated.

#### Range Management Actions

Livestock (cattle) are grazed in four allotments within the Riordan's Well WSA. Refer to Appendix C for additional information. Approximately 500 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

With the exception of a .25-mile fence in the nonsuitable northern portion, all existing range developments have been technically cherrystemmed from the WSA. These cherrystemmed projects include a 2-mile and a .25-mile section of drift fence, and two spring developments, one with a .5-mile section of pipeline. Current maintenance would continue on all these developments.

Two range developments proposed for Riordan's Well WSA would be allowed. Upper Perish Spring, located on the eastern border of the WSA, and Seep Spring on the west, would be developed as a livestock waters. Development would include a fenced spring box and trough. A pipeline associated with Upper Perish Spring would be built outside the WSA boundary. The proposed spring development would be subject to the wilderness protection constraints set forth in the Wilderness Management Policy, as applied to construction and maintenance. Maintenance of the spring developments would be accomplished by vehicular access on existing roads.

A proposed well in Dry Basin, the Lower Perish Spring pipeline (2.5 miles), and a .5-mile pipeline extending into the southern part of the WSA would not be allowed.

A 1,500-acre chaining of pinyon-juniper woodland proposed in the northern portion of the WSA and an associated well, and two fenced crested wheatgrass seedings totalling 9,700 acres proposed in the southern portion would not be allowed. Nor would an allotment boundary fence proposed in the northern part of the WSA be allowed. Refer to the Range Projects Map.

The use of prescribed burns or limited suppression of wildfire could be used to achieve the proposed acreage of vegetation conversion. Any prescribed burns or limited suppression of wildfires within the WSA would have to adhere to the specifics outlined in the fire management plan as part of the wilderness management plan for the Riordan's Well WSA. Revegetation would be achieved through aerial or hand seeding methods using native species.

#### Woodland Products Management Actions

The entire Riordan's Well WSA would not be available as a cutting area for private or commercial use, nor for commercial pinyon nut harvest. The post and pole and salvage fuelwood sales anticipated without wilderness designation would not occur.



### Recreation Management Actions

The entire Riordan's Well WSA would be closed to recreational ORV use. Approximately 185 visitor days of ORV use are estimated to occur annually in this area. Vehicular use would continue along the boundary roads and 8.5 miles of cherrystemmed routes.

### PARTIAL WILDERNESS ALTERNATIVE NO. 2

The Partial Wilderness Alternative No. 2 recommends 45,791 acres of the Riordan's Well WSA as suitable for wilderness designation as well as an additional 2,405 acres located outside of the WSA. Refer to the Alternative Map. The remaining 11,211 acres of the WSA are recommended as nonsuitable for wilderness designation.

### Minerals Management Actions

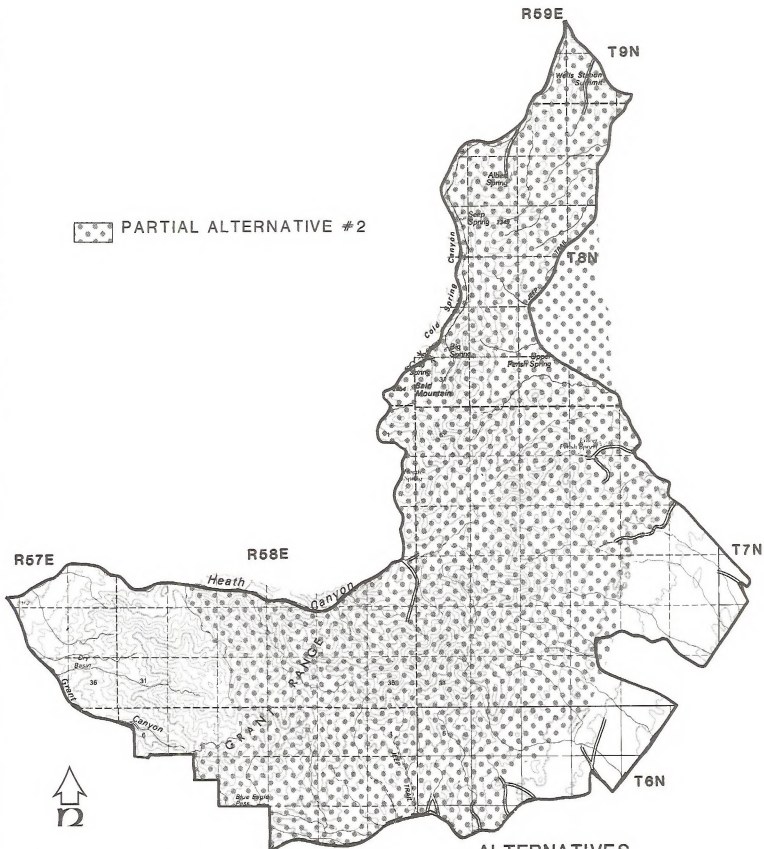
Subject to valid and existing rights, 45,791 acres of the Riordan's Well WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws as would the additional 2,405 acres outside the WSA included in the suitable recommendation. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. The remaining 11,211 acres would continue to be open for mineral entry and leasing. As of 1983, 39 mining claims were located within the suitable portion of the WSA, and 52 were located in the nonsuitable portion.

Given valid and existing claims prior to designation, some exploration and mineral development is expected to occur within the suitable portion of the WSA.

The Troy Mining District is located adjacent to the southwestern corner of the WSA. This district has a recorded production of about \$1 million in gold and a moderate tonnage of tungsten (GEM, 1983).

Development of a small underground mining operation is expected within the suitable southern portion of the WSA. The mine would utilize three conventional flotation cells to reduce crushed rock to three separate concentrates. In one cell, tin- and tungsten-bearing minerals would be selectively separated from all the other material by chemical or gravimetric means. In the second cell, copper- and gold-bearing minerals would be collected in the same manner by use of different chemicals. In the final cell, lead-, zinc, and silver-bearing compounds would be collected.

 PARTIAL ALTERNATIVE #2



ALTERNATIVES  
RIORDAN'S WELL  
NV-040-166

As with other underground operations, most surface disturbance would be attributed to processing facilities rather than actual mining. Within the suitable WSA boundary a total of 8 acres of surface disturbance from this operation would result from a 4-acre waste dump and construction of a haul road. An 8-acre beneficiation complex and 10 acres of tailings ponds and related facilities would be located in the nonsuitable portion of the WSA, to the south.

A small exploration program (also within the suitable portion) targeting disseminated gold deposits in the central portion of the WSA would be accomplished by helicopter portable drill methods. A total of about 1 acre of surface disturbance would result from drilling activities.

Exploration efforts in the northern portion of the WSA would intensify targeting low-grade, large tonnage disseminated gold and silver deposits. Two distinct exploration programs would include minimal drill access construction and drill pads. Trenching would not be allowed. The largest exploration program in the north would disturb a total of 4 acres and the other northern program would disturb 2 acres.

A total of 15 acres of surface disturbance is anticipated within the suitable portion of the WSA as a result of mining and mineral exploration activities.

#### Energy Management Actions

Potential for oil and gas discovery is considered low (GEM, 1983). The producing oil wells in Railroad Valley lie just outside of the WSA to the west. All production is presently limited to the valley floor. Interest in the WSA is expected to continue, resulting in seismic lines and two wildcat wells, totalling 26 acres of surface disturbance.

Geophysical and oil and gas exploration is not expected to take place within the suitable portion of the WSA.

Based on current exploration trends, 6 miles of cumulative seismic line within the southeast bench of the WSA would result in 12 acres of surface disturbance in the form of visible linear tracks within the nonsuitable portion of the WSA.

In addition, two wildcat wells, one on the western tip of the nonsuitable portion of the WSA and the other on the east bench (also in the nonsuitable portion) would be drilled. Each well would result in the clearing of a 3-acre pad and 2 acres for access.

Geothermal potential for the WSA is low. Potential may exist outside the WSA for geothermal development, but development inside the WSA is not anticipated.

### Range Management Actions

Livestock (cattle) are grazed in four allotments within the Riordan's Well WSA. Refer to Appendix C for additional information. Approximately 380 AUM's are currently utilized within the suitable portion of the WSA and 120 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.

With the exception of a .25-mile fence, in the nonsuitable northern portion, all existing range developments have been technically cherrystemmed from the WSA. These cherrystemmed projects include 2-mile and .25-mile sections of drift fences, and two spring development, one with a .5-mile section of pipeline. Current maintenance would continue on all of these developments.

Two proposed spring developments, one at Seep Spring and the other at Upper Perish Spring would be built within the suitable portion of the WSA. A 2-mile pipeline associated with the spring development is proposed for construction entirely within an additional 2,000-acre area outside of the WSA, an area which is being recommended for wilderness under this alternative. (Refer to Chapter 1, "Development of Alternatives.") This pipeline would not be developed.

Development of Seep Spring and Upper Perish Spring would be subject to the wilderness protection constraints set forth in the Wilderness Management Policy, as applied to construction and maintenance. Maintenance of the spring developments would be achieved by vehicular access on existing roads.

A proposed spring redevelopment and 2.5-mile pipeline at Lower Perish Spring would not be allowed. Approximately 2 miles of the pipeline would have run through the suitable portion of the WSA and .5 miles through the nonsuitable part.

In the southern portion of the WSA, two fenced crested wheatgrass seedings totalling 9,700 acres are proposed. The 4,600 acres of seeding proposed within the suitable portion of the WSA would not be allowed. The remaining 5,100 acres of fenced seeding within the nonsuitable portion would be allowed.

A proposed 1,500-acre chaining of pinyon-juniper woodland and an associated livestock well in the northern portion of the WSA would not occur. Nor would an allotment boundary fence proposed in the northern part of the WSA be allowed.

The use of prescribed burns or limited suppression of wildfire could be used to attain the proposed acreage of vegetation conversion in the northern portion of the WSA. Any prescribed burns or limited suppression of wildfires within the WSA would have to adhere to the specifics outlined in the fire management plan as part of the wilderness management plan for the Riordan's Well WSA. Revegetation would be accomplished through aerial or hand seeding methods using native species.

## RIORDAN'S WELL

Proposed range developments within the nonsuitable portion include development of a livestock well in Dry Basin and a .5-mile pipeline in the southern portion of the WSA. Both of these projects, as well as the 5,100 acres of fenced seeding mentioned above, would be completed. Refer to the Range Projects Map.

### Woodland Products Management Actions

The 45,791-acre suitable portion of the Riordan's Well WSA, as well as the additional 2,405 acres outside the WSA included in the suitable recommendation, would not be available as a cutting area for private or commercial use, nor for commercial pinyon pine nut harvest. Post and pole and salvage fuelwood sales anticipated without wilderness designation would not occur.

A private fuelwood sale proposed in the 2,000-acre non-WSA acreage included in the suitable recommendation would also not occur. Approximately 6,000 cords would not be harvested.

### Recreation Management Actions

The 48,196-acre area recommended as suitable would be closed to recreational ORV use. Approximately 148 visitor days of ORV use are estimated annually for this suitable area. Vehicular use would continue along the boundary roads and the 6 miles of cherrystemmed routes. The 11,211-acre nonsuitable portion would be managed as open for recreational ORV use.

## NO WILDERNESS ALTERNATIVE

The No Wilderness Alternative recommends the entire 57,002-acre area as nonsuitable for wilderness designation.

### Minerals Management Actions

Under this alternative, the entire 57,002-acre Riordan's Well WSA would remain open for mineral entry under the mining and mineral leasing laws. Validity examinations would not be required prior to development. As of 1983, 91 mining claims were located within the WSA.

The Troy Mining District is located adjacent to the southwestern corner of the WSA. This district has a recorded production of about \$1 million in gold and a moderate tonnage of tungsten (GEM, 1983).

Development of a small underground mining operation is expected to occur within the southern portion of the WSA. The mine would utilize three conventional flotation cells to reduce crushed rock to three separate concentrates. In one cell tin- and tungsten-bearing minerals would be selectively separated from all the other material by chemical or gravimetric means. In the second cell, copper- and gold-bearing minerals would be collected in the same manner by use of different chemicals. In the final cell, lead-, zinc-, and silver-bearing compounds would be collected.

As with other underground operation, most surface disturbance would be attributed to processing facilities rather than actual mining. A beneficiation complex would disturb 8 acres. A total of 4 acres of surface disturbance would result from upgrading of existing roads for use as haul roads. A tailings pond would disturb 10 acres and a waste dump would consume a total of 6 acres. Surface disturbance for this small operation would total 28 acres.

Exploration efforts in the northern portion of the WSA would intensify targeting low-grade, large tonnage disseminated gold and silver deposits. Three distinct exploration programs would include drill access construction, drill pads, and trenching. Two of the exploration programs would be located in the northern portion of the WSA and one program would be located in the central portion of the WSA. The largest exploration program in the north would disturb a total of 10 acres and the other northern program would disturb 6 acres.

The exploration program in the central part of the WSA would total 3 acres of surface disturbance. Mineral development is not anticipated as a result of the exploration programs.

A total of 47 acres of surface disturbance is anticipated as a result of mining and mineral exploration activities.

#### Energy Management Actions

Potential for oil and gas discovery is considered low (GEM, 1983). The producing oil wells in Railroad Valley lie just outside of the WSA to the west. All production is presently limited to the valley floor. Interest in the WSA is expected to continue, resulting in seismic lines and two wildcat wells, totalling 22 acres of surface disturbance.

Based on current exploration trends, 6 miles of cumulative seismic line within the southeast bench of the WSA would result in 12 acres of surface disturbance in the form of visible linear tracks within the nonsuitable portion of the WSA.

In addition, two wildcat wells, one on the western tip of the nonsuitable portion of the WSA and the other on the east bench (also in the nonsuitable portion) would be drilled. Each well would result in the clearing of a 3-acre pad and 2 acres for access.

Geothermal potential for the WSA is low. Potential may exist outside the WSA for geothermal development, but development inside the WSA is not anticipated.



TABLE 6

## SUMMARY OF IMPACTS - RIORDAN'S WELL

IMPACT TOPIC	PROPOSED ACTION	ALL WILDERNESS
WILDERNESS VALUES	The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 6,660 acres. The remaining 12,800 nonsuitable acres would retain their wilderness values.	The result of designation of the Riordan's Well WSA as wilderness would be to preserve the naturalness and excellent opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Even with wilderness designation, long-term negative impacts to the wilderness qualities would occur on approximately 15 acres.
EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES	Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 31 acres of surface disturbing exploration and development activity expected within the suitable portion if designation does not occur would be reduced to 9 acres if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located in the nonsuitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.	Exploration and development of potential mineral resources would be foregone on all unclaimed lands within the WSA. The 47 acres of surface disturbing exploration and development activity expected if designation does not occur would be reduced to 15 acres within the WSA if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located outside of the WSA.
EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES	Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.	All lands within the WSA would be withdrawn from mineral leasing. Two wildcat oil wells would be drilled on existing leases. Geophysical exploration totalling 6 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and development is not expected.
GRAZING FACILITY MAINTENANCE & CONSTRUCTION	There would be no impacts to grazing facility maintenance. There would be a minor impact to grazing facility construction within the suitable portion. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the suitable portion would be foregone by disallowing portions of two seedings. There would be no impacts to grazing facility construction within the nonsuitable portion of the WSA.	There would be no impact to grazing facility maintenance. There would be a negative impact to grazing facility construction. The absence of some additional water developments would not affect current grazing, however, better cattle distribution would not be achieved. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the WSA would be foregone by disallowing two seedings and one chaining.
WOODLAND PRODUCTS HARVEST	The harvest of 1,000 post and poles and commercial sales of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland product harvest within the nonsuitable portion of the WSA.	The harvest of 8,100 cords of fuelwood, 1,400 posts and poles and commercial sales of pine nuts within the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.
RECREATIONAL OFF-ROAD USE	Recreational ORV use of 122 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.	Recreational ORV use of 185 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.



PARTIAL WILDERNESS NO. 2	NO WILDERNESS	IMPACT TOPIC
<p>The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, excellent opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 5,200 acres. The remaining 6,011 nonsuitable acres would retain their wilderness values.</p>	<p>Long-term physical impairment to the wilderness qualities of the Riordan's Well WSA would occur on approximately 10,675 acres in the southern and north-central portion of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values within the WSA would not be impaired. Special geologic features, ponderosa pine stands, and raptor habitat would not be affected by a no wilderness designation. The remaining 46,327 acres would retain their wilderness values.</p>	<p>WILDERNESS VALUES</p>
<p>Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 47 acres of surface disturbing exploration and development activity expected within the suitable portion if designation does not occur would be reduced to 15 acres if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located in the nonsuitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.</p>	<p>All lands within the Riordan's Well WSA would remain open for mineral entry. There would be no impact on the exploration and development of mineral resources.</p>	<p>EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES</p>
<p>Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.</p>	<p>All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.</p>	<p>EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES</p>
<p>There would be no impacts to grazing facility maintenance. There would be a negative impact to grazing facility construction. The absence of some additional water developments would not affect current grazing, however, better cattle distribution would not be achieved. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the suitable portion of the WSA would be foregone by disallowing portions of two seedings and one chafing. There would be no impacts to grazing facility construction within the nonsuitable portion of the WSA.</p>	<p>There would be no impacts on grazing facility maintenance and construction within the Riordan's Well WSA.</p>	<p>GRAZING FACILITY MAINTENANCE &amp; CONSTRUCTION</p>
<p>The harvest of 14,100 cords of fuelwood and 2,400 posts and poles and commercial sales of pine nuts within the area recommended as suitable for wilderness would be foregone. This would be a minor impact since woodland products readily available outside of this area could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.</p>	<p>There would be no impacts on woodland products harvest.</p>	<p>WOODLAND PRODUCTS HARVEST</p>
<p>Recreational ORV use of 148 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.</p>	<p>There would be no impacts to recreational ORV use.</p>	<p>RECREATIONAL OFF-ROAD USE</p>

### Range Management Actions

Livestock (cattle) are grazed in four allotments within the Riordan's Well WSA. Refer to Appendix C for additional information. Approximately 500 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

With the exception of a .25-mile fence, all existing range developments have been technically cherrystemmed from the WSA. These cherrystemmed projects include 2-mile and .25-mile sections of drift fences, and two spring developments, one with a .5-mile section of pipeline. Current maintenance would continue on all of these developments.

Proposed developments for the Riordan's Well WSA include a well in Dry Basin, the development of Seep Spring and Upper Perish Spring, a 2.5-mile pipeline extending through the WSA from the already developed Lower Perish Spring, a .5-mile section of pipeline extending into the southern portion of the WSA, and a 3.5-mile allotment boundary fence.

In addition, within the northern portion of the WSA, 1,500 acres of pinyon-juniper stands would be chained to increase forage for livestock and wildlife. The area would then be seeded with crested wheatgrass as well as with native species. A water well would also be drilled in the area.

In the southeast portion of the WSA two areas totalling 9,700 acres would be plowed and seeded with crested wheatgrass to increase livestock forage. Both of the areas would be fenced. Approximately 10 miles of the fencing would be built within the WSA. Refer to the Range Projects Map.

### Woodland Products Management Actions

A 1,500-acre proposed chaining in the northern portion of the WSA would have a salvage fuelwood sale associated with it. The sales could occur either before or after the chaining. Approximately 8,100 cords would be harvested.

Along the northeast and northwest boundary roads, post and pole sales would occur. Approximately 1,200 posts and poles would be harvested on each side of the WSA.

Commercial pinyon pine nut sales would take place in accessible areas of the WSA, based on nut crop availability.

### Recreation Management Actions

The entire Riordan's Well WSA would be managed as open for recreational ORV use.

## SOUTH EGAN RANGE WSA

NV-040-168

### PROPOSED ACTION (No Wilderness Alternative)

The Proposed Action recommends the entire 96,916-acre area as nonsuitable for wilderness designation.

#### Minerals Management Actions

Under this alternative, the entire 96,916-acre South Egan Range WSA would remain open for mineral entry under the mining and mineral leasing laws. Validity examinations would not be required prior to development. As of 1983, a total of 51 mining claims were located within the WSA.

The Ellison (or Sawmill) Mining District is located east of Lund, Nevada, within the northern portion of the South Egan Range WSA.

Three distinct exploration programs targeting precious metal mineralization and disseminated gold are expected to take place within the South Egan Range WSA. Two of the exploration programs would be located in the northern portion of the WSA. These programs would be associated with mineralization in the Ellison Mining District. Another exploration program would be located in the east-central portion of the WSA. A total of 17 acres of surface disturbance associated with access and drill pad construction would result from the three exploration programs.

The largest of the two northern exploration programs would disturb 8 acres. The other program, located east of Lund, Nevada, would disturb 5 acres. Exploration efforts southwest of Willow Spring Canyon in the east-central portion of the WSA would disturb a total of 4 acres.

Development or production of mineral resources is not expected to occur as a result of exploration.

#### Energy Management Actions

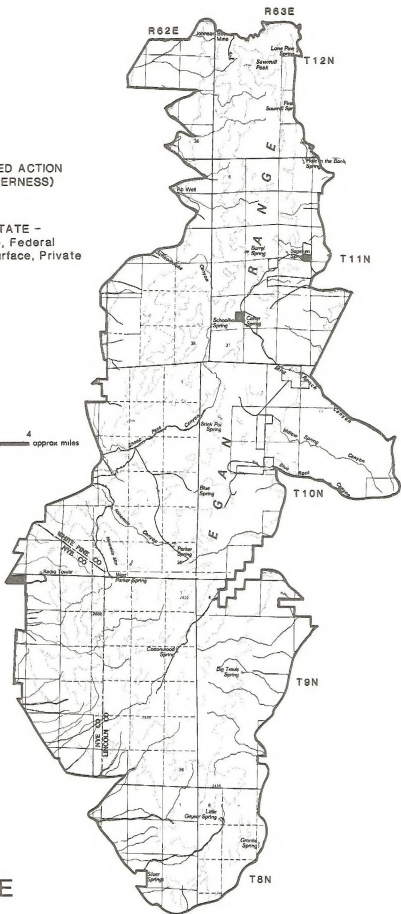
Energy resource potential (oil and gas) is considered low within the South Egan Range WSA due to high angle faulting. Oil and gas leases exist on the lower bench areas of the WSA. Exploration for oil and gas resources would result in two wildcat wells being drilled on the western bench of the WSA in White River Valley. The drilling of wildcat wells is not expected to occur on the eastern bench in Cave Valley. Surface disturbance from the two wildcat wells would total 10 acres. The 3-acre drill pads would be stripped of topsoil which would be stockpiled for reclamation. Each drill pad would have about 1 mile (2 acres) of access construction, totalling 4 acres of surface disturbance.

□ PROPOSED ACTION  
(NO WILDERNESS)

■ SPLIT ESTATE -  
Surface, Federal  
Sub-Surface, Private



0 1 2 3 4  
approx miles



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Current levels of geophysical (seismic) exploration are expected to continue in the White River Valley. A cumulative total of 5 miles of seismic lines are anticipated on the western alluvial bench of the WSA. Surface disturbance in the form of visible linear tracks would total 10 acres.

Geothermal resources for most of the South Egan Range are considered to be low. A 328-acre area of moderate geothermal potential associated with Emigrant Springs (GEM, 1983) is identified on the west side of the WSA. Development of geothermal resources for greenhouses or catfish farming is likely to occur in the future. These developments, however, would be located adjacent to the existing geothermal waters just outside of the WSA. Development of geothermal resources within the WSA is not anticipated.

#### Range Management Actions

Livestock (cattle and sheep) are grazed in eight allotments within the South Egan Range WSA. Refer to Appendix C for additional information. Approximately 4,266 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

Existing range developments within the WSA include several short sections of fence totalling about 4.5 miles, .5-mile of pipeline, two developed springs, and portions of two vegetation conversions totalling 1,600 acres. In addition, several developments are technically cherrystemmed out of the WSA. These include 3.5 miles of fence, 1 mile of pipeline, one reservoir, and six developed springs. Several miles of fences form portions of the WSA boundary. Refer to the Range Projects Map.

Maintenance of most of these developments is conducted using vehicles along existing cherrystemmed routes. This type of maintenance would continue in the future. Maintenance of the old vegetation conversions would be accomplished by burning and reseeding with a rangeland drill.

Several range projects are proposed for the South Egan Range WSA. These projects include development of two springs (Schoolhouse and Stink Pot) in the central portion of the WSA and a livestock well in the northwest corner. Two stock reservoirs are proposed in the eastern portion of the WSA. In addition, three burns totalling 1,800 acres (600 acres each) and one 1,200-acre seeding are proposed on the eastern edge of the WSA.

#### Woodland Products Management Actions

On the northwest side of the WSA near Lund, a 120-acre private greenwood cutting area would be designated. Approximately 360 cords of fuelwood would be harvested. Along the northeast boundary of the WSA, two areas (one 60 acres and the other 80 acres) would be designated for Christmas tree sales. A total of approximately 540 trees would be harvested every 6 years.

Commercial pine nut sales would take place in the southeast portion of the WSA based on nut crop availability.

## SOUTH EGAN RANGE

### Recreation Management Actions

The entire South Egan Range WSA would be managed as open for recreational ORV use.

### ALL WILDERNESS ALTERNATIVE

The All Wilderness Alternative recommends the entire 96,916-acre area as suitable for wilderness designation.

### Minerals Management Actions

Subject to valid and existing rights, 96,916 acres of the South Egan Range WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. As of 1983, a total of 51 mining claims were located within the South Egan Range WSA.

The Ellison (or Sawmill) Mining District is located east of Lund, Nevada, within the northern portion of the South Egan Range WSA.

Given valid existing claims prior to designation, some exploration is anticipated in areas presently recognized as being mineralized. Two distinct exploration programs targeting precious metal mineralization associated with the Ellison Mining District are expected to take place within the northern portion of the WSA. A total of 4 acres of surface disturbance associated with minimal access and drill pad construction would result from the two exploration programs. Access would be by cross-country vehicle travel or limited to existing cherrystemmed routes. The use of helicopter portable drills may also be required.

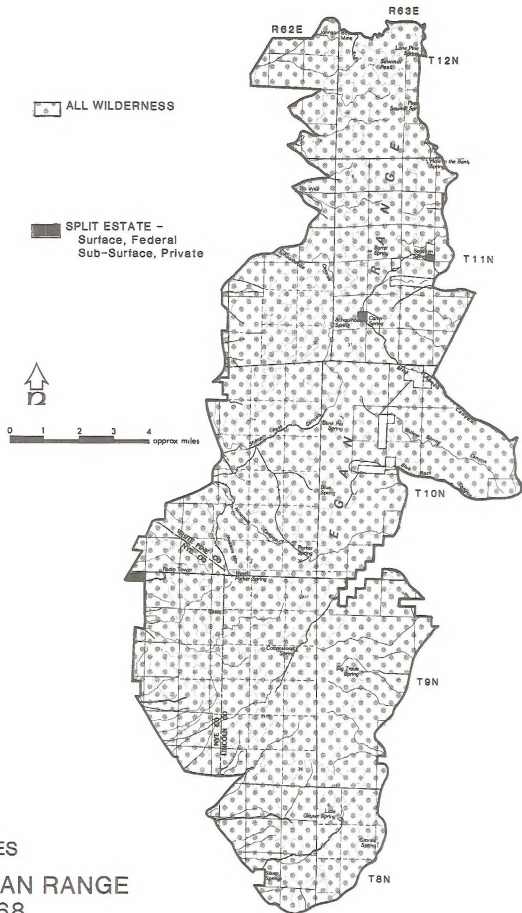
The largest of the two northern exploration programs would disturb 3 acres. The other program, located east of Lund, Nevada, would disturb 1 acre.

Development or production of mineral resources is not expected to occur as a result of exploration. Prior to approval of a plan of operations, mitigating measures will be adopted to minimize impacts to the wilderness resource.

### Energy Management Actions

Energy resource potential (oil and gas) is considered low within the South Egan Range WSA due to high angle faulting. Oil and gas leases exist on the lower bench areas of the WSA. Given existing leases, exploration for oil and gas resources would result in two wildcat wells being drilled on the western bench of the WSA in White River Valley. The drilling of wildcat wells is not expected to take place on the eastern bench in Cave Valley. Surface disturbance from the two wildcat wells would total 10 acres. The





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## SOUTH EGAN RANGE

3-acre drill pads would be stripped of topsoil which would be stockpiled for reclamation. Access construction would involve 2 acres of surface disturbance. Each drill pad would have about 1 mile of access construction, totalling 4 acres of surface disturbance.

Current levels of geophysical (seismic) exploration are expected to continue in the White River Valley. A cumulative total of 5 miles of seismic lines are anticipated on the western alluvial bench of the WSA. Geophysical exploration would be limited to existing cherrystemmed routes resulting in no additional surface disturbance.

Geothermal resources for most of the South Egan Range are considered low. A 328-acre area of moderate geothermal potential associated with Emigrant Springs (GEM, 1983) is identified on the west side of the WSA. Development of geothermal resources for greenhouses or catfish farming is likely to occur in the future. These developments, however, would be located adjacent to the existing geothermal waters just outside of the WSA. Development of geothermal resources within the WSA is not anticipated.

### Range Management Actions

Livestock (cattle and sheep) are grazed in eight allotments within the South Egan Range WSA. Refer to Appendix C for additional information. Approximately 4,266 AUM's are currently utilized within the WSA. These levels may vary slightly in the future based on resource monitoring.

Existing range developments within the WSA include several short sections of fence totalling about 4.5 miles, .5-mile of pipeline, two developed springs, and portions of two vegetation conversions totalling 1,600 acres. In addition, several developments are technically cherrystemmed out of the WSA. These include 3.5 miles of fence, 1 mile of pipeline, one reservoir, and six developed springs. Several miles of fences form portions of the WSA boundary. Refer to the Range Projects Map.

Maintenance of most of these developments is conducted using vehicles along existing cherrystemmed routes. This type of maintenance would continue in the future. Maintenance of the old vegetation conversions would be accomplished by burning and manually or aerially reseeding.

Several range projects are proposed for the South Egan Range WSA. Two springs, Schoolhouse and Stink Pot, would be developed and fences. A livestock well proposed in the northwest corner of the WSA would be located to the west, outside of the WSA. Two stock reservoirs proposed on the east side of the WSA would not be constructed.

A 1,200-acre seeding proposed on the east side of the WSA would not be allowed. The seeding would have to be located to the east, outside of the WSA. Three areas proposed for prescribed burns for the purpose of increasing livestock forage would not be allowed. The reintroduction of natural wildfires into the ecosystem may help accomplish these goals. Any limited suppression of wildfires within the WSA would have to adhere to the specifics outlined in the fire management plan as part of the wilderness management plan for the South Egan Range WSA.

#### Woodland Products Management Actions

The entire South Egan Range WSA would not be available as a cutting area for private or commercial use, nor for commercial pinyon pine nut harvest. The fuelwood, Christmas tree, and commercial pinyon nut sales proposed without wilderness designation would not occur.

#### Recreation Management Actions

The entire South Egan Range WSA would be closed to recreational ORV use. Approximately 320 visitor days of ORV use are estimated annually for this area. The Highway 318 right-of-way fence outside of the west boundary of the WSA has curtailed ORV use along the west benches of the WSA. Vehicle use would continue along the boundary roads and 46 miles of cherrystemmed routes.

### PARTIAL WILDERNESS ALTERNATIVE NO. 1

The Partial Wilderness Alternative No. 1 recommends 57,660 acres of the South Egan Range WSA as suitable for wilderness designation and 39,256 acres as nonsuitable for wilderness designation.

#### Minerals Management Actions

Subject to valid and existing rights, 57,660 acres of the South Egan Range WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to continued operations. The remaining 39,256 acres would continue to be open for mineral entry and leasing. As of 1983, no mining claims were located within the suitable portion of the WSA and a total of 51 mining claims were located within the nonsuitable portion of the WSA.

The Ellison (or Sawmill) Mining District is located east of Lund, Nevada, within the northern portion of the South Egan Range WSA.



Exploration and development of mineral resources is not expected to occur within the suitable portion of the South Egan Range WSA. Within the nonsuitable portion, two exploration programs targeting precious metal mineralization associated with the Ellison Mining District are expected to take place within the northern portion of the WSA, associated with mineralization in the Ellison Mining District. A total of 13 acres of surface disturbance associated with access and drill pad construction would result from the two exploration programs.

The largest of the two northern exploration programs would disturb 8 acres. The other program, located east of Lund, Nevada, would disturb 5 acres.

Development or production of mineral resources is not expected to occur as a result of exploration.

#### Energy Management Actions

Energy resource potential (oil and gas) is considered low within the South Egan Range WSA due to high angle faulting. Oil and gas leases exist on the lower bench areas of the WSA. Exploration for oil and gas resources would result in two wildcat wells being drilled on the western bench of the nonsuitable portion of the WSA in White River Valley. The drilling of wildcat wells is not expected to occur on the eastern bench in Cave Valley or within the suitable portion. Surface disturbance from the two wildcat wells would total 10 acres. The 3-acre drill pads would be stripped of topsoil which would be stockpiled for reclamation. Access construction would involve 1 mile (2 acres) of surface disturbance for each site, totalling 4 acres.

Seismic exploration is not anticipated within the suitable portion of the WSA. Current levels of geophysical (seismic) exploration are expected to continue in the White River Valley. A cumulative total of 5 miles of seismic lines are foreseen on the western alluvial bench of the nonsuitable portion of the WSA. Surface disturbance in the form of visible linear tracks would total 10 acres.

Geothermal resources for most of the South Egan Range are considered low. A 328-acre area of moderate geothermal potential associated with Emigrant Springs (GEM, 1983) is identified on the west side of the nonsuitable portion of the WSA. Development of geothermal resources for greenhouses or catfish farming is likely to occur in the future. These developments, however, would be located adjacent to the existing geothermal waters just outside of the WSA. Development of geothermal resources within the suitable portion of the WSA is not anticipated.

## SOUTH EGAN RANGE

### Range Management Actions

Livestock (cattle and sheep) are grazed in eight allotments within the South Egan Range WSA. Refer to Appendix C for additional information. Approximately 1,168 AUM's are currently utilized within the suitable portion of the WSA and 3,098 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.

Existing range developments within the WSA are almost all within the suitable portion and include several short sections of fence totalling about 4.5 miles, .5-mile of pipeline, two developed springs, and portions of two vegetation conversions totalling 1,600 acres. In addition, several developments are technically cherrystemmed out of the WSA. These include 3.5 miles of fence, 1 mile of pipeline, one reservoir, and six developed springs. Several miles of fences form portions of the WSA boundary. Refer to the Range Projects Map.

Maintenance of most of these developments is conducted using vehicles along existing cherrystemmed routes. This type of maintenance would continue in the future. Maintenance of the old vegetation conversions would be accomplished by burning and reseeding with a rangeland drill.

Several projects are proposed for the suitable portion of the South Egan Range WSA. Two springs, Schoolhouse and Stink Pot, would be developed and fences. One stock reservoir proposed on the east side of the WSA would not be constructed. A 1,200-acre seeding proposed on the east side of the WSA would not be allowed. The seeding would have to be located to the east, outside of the WSA. Two areas proposed for prescribed burns for the purpose of increasing livestock forage would not be allowed. The reintroduction of natural wildfires into the ecosystem may help accomplish these goals. Any limited suppression of wildfires within the WSA would have to adhere to the specifics outlined in the fire management plan as part of the wilderness management plan for the South Egan Range WSA.

Several range projects are proposed and would be constructed within the nonsuitable portion of the WSA. These projects include a livestock well in the northeast corner, one stock reservoir in the eastern portion of the WSA, and one burn, 600 acres, on the northeast edge of the WSA.

### Woodland Products Management Actions

The 57,660-acre suitable portion of the South Egan Range WSA would not be available as a cutting area for private or commercial use, nor for commercial pinyon pine nut harvest.

All anticipated cutting areas within the WSA would be located in the nonsuitable portion of the WSA. On the northwest side of the WSA near Lund, a 120-acre private greenwood cutting area would be designated. Approximately 360 cords of fuelwood would be harvested. Along the northeast boundary of the WSA, two areas (one 60 acres and the other 80 acres) would be designated for Christmas tree sales. A total of approximately 540 trees would be harvested every 6 years.

Commercial pine nut sales would take place in the southeast portion of the WSA based on nut crop availability.

#### Recreation Management Actions

The 57,660-acre suitable portion of the South Egan Range WSA would be closed to recreational ORV use. Approximately 192 visitor days of ORV use are estimated annually for this area. The Highway 318 right-of-way fence outside of the west boundary of the WSA has curtailed ORV use along the west benches of the WSA. Vehicular use would continue along the boundary roads and the 27 miles of cherrystemmed routes. The 39,256-acre nonsuitable portion would be managed as open to recreational ORV use.

### PARTIAL WILDERNESS ALTERNATIVE NO. 2

The Partial Wilderness Alternative No. 2 recommends 16,560 acres of the South Egan Range WSA as suitable for wilderness designation and 80,356 acres as nonsuitable for wilderness designation.

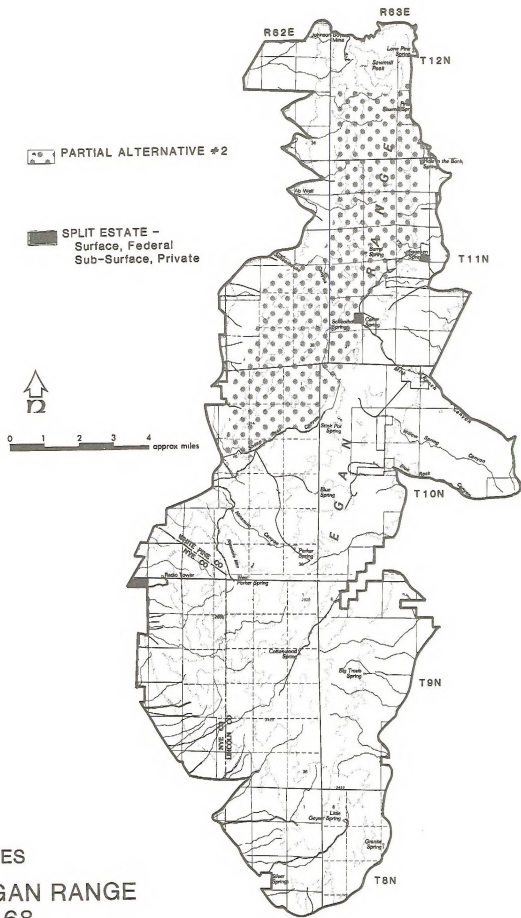
#### Minerals Management Actions

Subject to valid and existing rights, 16,560 acres of the South Egan Range WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims existing at the time of designation, prior to development. The remaining 80,356 acres would continue to be open for mineral entry and leasing. As of 1983, no mining claims were located within the suitable portion of the WSA and a total of 51 mining claims were located within the nonsuitable portion of the WSA.

The Ellison (or Sawmill) Mining District is located east of Lund, Nevada, within the northern portion of the South Egan Range WSA.

Exploration and development of mineral resources is not expected to occur within the suitable portion of the South Egan Range WSA. Within the nonsuitable portion, three distinct exploration programs targeting precious metal mineralization and disseminated gold are expected to take place. Two of the exploration programs would be located in the northern part of the nonsuitable portion of the WSA and are associated with mineralization in the Ellison Mining District. Another exploration program would be located in





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the east-central portion of the WSA. A total of 17 acres of surface disturbance associated with access and drill pad construction would result from the three exploration programs.

The largest of the two northern exploration programs would disturb 8 acres. The other program, located east of Lund, Nevada, would disturb 5 acres. Exploration efforts southwest of Willow Spring Canyon in the east-central portion of the WSA would disturb a total of 4 acres. Development or production of mineral resources is not expected to occur as a result of exploration.

#### Energy Management Actions

Energy resource potential (oil and gas) is considered low within the South Egan Range WSA due to high angle faulting. Oil and gas leases exist on the lower bench areas of the WSA. Exploration for oil and gas resources would result in two wildcat wells being drilled on the western bench of the nonsuitable portion of the WSA in White River Valley. The drilling of wildcat wells is not expected to take place on the eastern bench in Cave Valley or within the suitable portion. Surface disturbance from the two wildcat wells would total 10 acres. The 3-acre drill pads would be stripped of topsoil which would be stockpiled for reclamation. Access construction would involve 1 mile (2 acres) of surface disturbance for each pad, totalling four acres.

Seismic exploration is not anticipated within the suitable portion of the WSA. Current levels of geophysical (seismic) exploration are expected to continue in the White River Valley. A cumulative total of 5 miles of seismic lines are foreseen on the western alluvial bench of the nonsuitable portion of the WSA. Surface disturbance in the form of visible linear tracks would total 10 acres.

Geothermal resources for most of the South Egan Range are considered low. A 328-acre area of moderate geothermal potential associated with Emigrant Springs (GEM, 1983) is identified on the west side of the nonsuitable portion of the WSA. Development of geothermal resources for greenhouses or catfish farming is likely to occur in the future. These developments, however, would be located adjacent to the existing geothermal waters just outside of the WSA. Development of geothermal resources within the suitable portion of the WSA is not anticipated.

#### Range Management Actions

Livestock (cattle and sheep) are grazed in eight allotments within the South Egan Range WSA. Refer to Appendix C for additional information. Approximately 150 AUM's are currently utilized within the suitable portion of the WSA and 4,116 AUM's within the nonsuitable portion. These levels may vary slightly in the future based on resource monitoring.

TABLE 7

## SUMMARY OF IMPACTS - SOUTH EGAN RANGE

IMPACT TOPIC	PROPOSED ACTION	ALL WILDERNESS
WILDERNESS VALUES	<p>Long-term physical impairment to the wilderness qualities of the South Egan Range WSA would occur on approximately 1,500 acres in the northern and eastern portions of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values, including bristlecone pine, unique geologic features, and raptor habitat would not be impaired or affected by a no wilderness designation. The remaining 95,416 acres would retain their wilderness values.</p>	<p>The result of designation of the South Egan Range WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, bristlecone pine, and raptor habitat would also be preserved. Long-term physical impacts to the wilderness quality of the South Egan Range WSA would occur on about 14 acres.</p>
EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES	<p>All lands within the South Egan Range WSA would remain open to mineral entry. There would be no impact on the exploration and development of mineral resources.</p>	<p>Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 17 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 4 acres within the WSA if designation occurs. Favorability for development of mineral resources is low within the WSA and development of mineral resources is not expected.</p>
EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES	<p>All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.</p>	<p>All lands within the WSA would be withdrawn from mineral leasing. Two wildcat oil wells would be drilled on existing leases. Geophysical exploration totalling 5 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and development is not expected.</p>
GRAZING FACILITY MAINTENANCE AND CONSTRUCTION	<p>There would be no impacts on grazing facility maintenance and construction.</p>	<p>There would be no impacts to grazing facility maintenance. There would be minor impacts to grazing facility construction. Most of the disallowed projects (prescribed burns, seedings, and water developments) could be located outside of the WSA boundary and still achieve the same goals. Absence of these projects within the WSA would have no impact on current grazing in the area.</p>
WOODLAND PRODUCTS HARVEST	<p>There would be no impacts on woodland products harvest.</p>	<p>The harvest of 540 Christmas trees every 6 years and 360 cords of fuelwood, and commercial sales of piñon pine nuts within the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand.</p>
RECREATIONAL OFF-ROAD USE	<p>There would be no impacts to recreational ORV use.</p>	<p>Recreational ORV use of 320 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.</p>

PARTIAL WILDERNESS NO. 1	PARTIAL WILDERNESS NO. 2	IMPACT TOPIC
<p>The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special features such as bristlecone pine, caves, raptor habitat, and highly scenic values. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 300 acres. The remaining 38,956 nonsuitable acres would retain their wilderness values.</p>	<p>The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special features such as bristlecone pine, caves, raptor habitat, and highly scenic values. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 1,500 acres. The remaining 78,856 nonsuitable acres would retain their wilderness values.</p>	<p>WILDERNESS VALUES</p>
<p>Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 4 acres of surface disturbing exploration activity expected within the suitable portion if designation does not occur would be eliminated if designation occurs due to lack of valid claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.</p>	<p>Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. Exploration of mineral resources is not anticipated to occur within the suitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.</p>	<p>EXPLORATION AND DEVELOPMENT OF MINERAL RESOURCES</p>
<p>Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development energy resources within the nonsuitable portion of the WSA.</p>	<p>Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.</p>	<p>EXPLORATION AND DEVELOPMENT OF ENERGY RESOURCES</p>
<p>There would be no impacts to grazing facility maintenance. There would be minor impacts to grazing facility construction within the suitable portion. The disallowed projects (prescribed burns, seedings, and a stock reservoir) could be located outside of the WSA boundary and still achieve the same goals. Absence of these projects within the suitable portion would have no impact on current grazing in the area. There would be no impacts on grazing facility construction within the nonsuitable portion.</p>	<p>There would be no impacts on grazing facility maintenance and construction.</p>	<p>GRAZING FACILITY MAINTENANCE AND CONSTRUCTION</p>
<p>The commercial harvest of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.</p>	<p>The commercial harvest of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.</p>	<p>WOODLAND PRODUCTS HARVEST</p>
<p>Recreational ORV use of 192 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.</p>	<p>Recreational ORV use of 54 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.</p>	<p>RECREATIONAL OFF-ROAD USE</p>

## SOUTH EGAN RANGE

All existing range developments are located within the nonsuitable portion of the WSA and include several short sections of fence totalling about 4.5 miles, .5-miles of pipeline, two developed springs, and portions of two vegetation conversions totalling 1,600 acres. In addition, several developments are cherrystemmed out of the WSA. These include 3.5 miles of fence, 1 mile of pipeline, one reservoir, and six developed springs. Several miles of fences form portions of the WSA boundary. Refer to the Range Projects Map.

Maintenance of most of these developments is conducted using vehicles along existing cherrystemmed routes. This type of maintenance would continue in the future. Maintenance of the old vegetation conversions would be accomplished by burning and reseeding with a rangeland drill.

The development and fencing of Schoolhouse Spring is the only project proposed in the suitable portion of the WSA.

Several range projects are proposed and would be developed in the nonsuitable portion of the WSA for the South Egan Range WSA. These projects include development of Stink Pot Spring in the central portion of the WSA and a livestock well in the northwest corner. Two stock reservoirs are proposed in the eastern portion of the WSA. In addition, three burns totalling 1,800 acres (600 acres each) and one 1,200-acre seeding are proposed on the eastern edge of the WSA.

### Woodland Products Management Actions

The 16,560-acre suitable portion of the South Egan Range WSA would not be available as a cutting area for private or commercial use, nor for commercial pinyon pine nut harvest.

All anticipated cutting areas within the WSA would be located in the nonsuitable portion of the WSA. On the northwest side of the WSA near Lund, a 120-acre private greenwood cutting area would be designated. Approximately 360 cords of fuelwood would be harvested. Along the northeast boundary of the WSA two areas (one 60 acres and the other 80 acres) would be designated for Christmas tree sales. A total of approximately 540 trees would be harvested every 6 years.

Commercial pine nut sales would take place in the southeast portion of the WSA based on nut crop availability.

### Recreation Management Actions

The 16,560-acre suitable portion of the South Egan Range WSA would be closed to recreational ORV use. Approximately 54 visitor days of ORV use are estimated annually for this suitable area. The Highway 318 right-of-way fence outside of the west boundary of the WSA has curtailed ORV use along the west benches of the WSA. Vehicular use would continue along the boundary roads and the 1 mile of cherrystemmed routes. The 80,356-acre nonsuitable portion would be managed as open to recreational ORV use.

# CHAPTER 3

## Affected Environment

### INTRODUCTION

This chapter includes a brief description of the elements of the environment in each WSA that could be affected by actions proposed in the alternatives, including the proposed action. In an analysis of the critical elements, BLM personnel determined that the following resources do not occur or would not be affected by any actions proposed: floodplains, wetlands, prime or unique farmlands, areas of critical environmental concern, prime or sole source of drinking water, air quality, wild or scenic rivers, soils, or vegetation.

All the maps referred to in this chapter are located in a map section between Chapters 3 and 4.

### GOSHUTE CANYON WSA NV-040-015

#### General Environment

The Goshute Canyon WSA is located approximately 60 miles north of Ely, Nevada, and includes part of a mountain range formed by intrusive activity and volcanism, and by subsequent basin and range faulting. Many rock types are present including limestones, shales, and dolomites. Elevations in the WSA extend below 7,000 feet and above 10,000 feet. The eastern and southwestern fringe is sagebrush-covered valley and benchland. Much of the remainder of the area consists of rugged mountains heavily forested by the ubiquitous pinyon pine and juniper; by uncommon numbers of less common species such as aspen, white fir, limber and bristlecone pines; and, in the canyons, cottonwoods, and willows. This unusually diverse environment provides habitat for a great number of wildlife species that include mule deer, mountain lions, bobcats, owls, falcons, eagles, hawks, kestrels, and marmots.

NOTE: The Goshute Canyon Natural Area/Instant Study Area (7,650 acres) overlaps the Goshute Canyon WSA. The overlapping portion is 5,009 acres in size, while 2,641 acres lie outside the WSA, separated from it by roads. (Refer to Appendix B.) A separate analysis has not been prepared for the Natural Area since the area is not a separate entity, but rather, an integral part of the WSA. The following description of the WSA fully considers the noteworthy features of the Natural Area.

#### Wilderness Values

**Naturalness:** The Goshute Canyon WSA is in a substantially natural condition, with most of the area in an almost perfectly natural condition. Only a few imprints of man's work lie within the WSA. These imprints are

all unnoticeable within the area as a whole and do not detract from the enjoyment of the area's wilderness character. Man-made features include stream control structures in Goshute Canyon constructed of natural materials to blend with surroundings and a dilapidated log cabin at Log Cabin Spring. Three drift fences totalling 1-3/4 miles, three spring developments with associated troughs, and two pipelines totalling 4½ miles up Carlson and Log Canyons are cherrystemmed out of the WSA. A road up Goshute Canyon was washed out by heavy spring and summer rains in 1983, and reconstruction is now impractical because of the severity of erosion. Rehabilitation should occur naturally over several decades. Approximately 13 miles of short two-track routes established on the periphery of the area by regular but seasonal cross-country vehicular travel are cherrystemmed from the WSA.

Apparent naturalness is affected to a slight degree by the outside sights and sounds of mining activities on the south end. Blasting and the sounds of heavy equipment can infrequently be heard at times, but at present these disturbances are sporadic.

The foregoing description of these several unnatural features tends to focus attention on them and thereby exaggerate their significance. Vegetative and topographic screening conceal most of these features whenever the visitor is more than a few feet distant from them. The overwhelming impression of the area is that it retains its primeval character, unaltered by man's activities.

Solitude: Opportunities for solitude in the Goshute Canyon WSA are outstanding. While the size and configuration of the area contribute to these, it is the topographic and vegetative screening which are primarily responsible. The unit takes in a 14 mile length of the Cherry Creek Mountains, a rugged and very precipitous range which runs along an approximately north-south axis but is highly broken by ancillary east-west ridges and associated canyons. The screening effect of this variegated terrain is complemented by extensive forestation which cloaks most of the area.

Users within this area would have excellent opportunities to avoid contact with others and find a secluded spot. The screening combined with the size and configuration of the area would provide opportunities for solitude while sustaining general wilderness use. Some interaction of users could occur at the highest peaks, the ridgelines, streams and springs, and at likely staging areas such as the upper Paris road. Access into the core of the unit requires a strenuous hike. This would tend to limit use and enhance solitude opportunities. A few cherrystemmed routes provide limited access into the higher country. Use of these routes is expected to fluctuate seasonally. Most current use occurs during deer season.



Primitive and Unconfined Recreation: Primitive recreation opportunities are outstanding in the Goshute Canyon WSA because of their quality and diversity. Present use of these opportunities is oriented toward hunting. Much of the WSA provides key habitat for mule deer, and every year heavy hunter use occurs all around the area's periphery. Mountain lions, blue grouse, and sage grouse are also unusually prolific and provide abundant hunting opportunities.

The area around Goshute Canyon, part of the designated Goshute Canyon Natural Area, offers especially noteworthy opportunities for recreation. Fishing opportunities occur in Goshute Creek, which hosts a population of Bonneville cutthroat trout. Easy walk-in camping can be done along the banks of both Goshute and Currie Creeks beneath cottonwoods and willows. The richness of wildlife and vegetation, attributable to the presence of the creeks (which are themselves unusual features in this part of Nevada) and numerous springs, enhance any visit to the area.

Goshute Cave, an extensive limestone solution cave offers excellent spelunking and geological study opportunities. About 2,000 feet of passageway offer varying degrees of challenge, from high-ceilinged level walkways to tight squeeze ways to an 80 foot free-fall descent that requires technical gear. There is great potential for other caves in the WSA.

Less utilized but similarly excellent recreation opportunities in the WSA include hiking for pleasure, backpacking, nature study, photography, rock climbing, and cross-country skiing. These are all enhanced by the richness of the area's scenery, flora, and fauna. Because much of the area is unexplored, the enjoyment of these is accompanied by the anticipation of discovery of some important, unreported resource.

Special Features: Many special features contribute to the attractiveness of the Goshute Canyon WSA. Goshute Cave, mentioned above, is one of these. The Ely BLM District has within its boundaries the greatest cave resources in Nevada, and Goshute Cave is one of the District's outstanding caves. In 1970, an area of about 200 acres surrounding and including the cave was designated as the Goshute Cave Geologic Area and was withdrawn from the general mining laws. (See Appendix B.) The cave has over 2,000 feet of passage and contains examples of most of the common cave formations. In addition, it contains some unique and rare formations including cave pearls, folia, shields, and blistered mammalaries. The cave provides excellent recreational spelunking and is highly decorated even though it has been subjected to over 100 years of recreational use. The cave is considered to be quite significant because of its decorations and recreational and geologic values.

The bristlecone pines located in many parts of the WSA are members of the oldest living species on earth. They occur in uncharacteristic abundance, and can be found in the classic, gnarled form as well as in the straighter configuration. Stands are extensive and cover miles of terrain. They have dendrochronological value and serve to enhance the scenic value of the area.



## GOSHUTE CANYON

A portion of the Cherry Creek wild horse herd use area occurs within the WSA. Only about 15 horses spend part of the year here and so have a low visibility in the area, but their presence would contribute to the wilderness experience of many users.

Wildlife serves as a supplemental value in both the WSA and the preliminarily suitable portion. The Bonneville cutthroat trout (Salmo clarki utah) in Goshute Creek has been classified as a Category 1 Sensitive species by the U.S. Fish and Wildlife Service. Elk, uncommon in most parts of Nevada, have been observed in the WSA, although there is no known resident population in the area. Several other species of big game and upland game are present. The sheer number and number of species of raptors in the WSA serve as a supplemental feature of the area. These include great horned owls, prairie falcons, kestrels, golden eagles, red-tailed hawks, Cooper's hawks, peregrine falcons, and bald eagles (the latter not known to roost in the area). The spotted bat (Euderma maculata) has also been classified as a Category 1 Sensitive species and has been seen at Goshute Cave. See Appendix D for additional information on sensitive species.

The scenic quality of the Goshute Canyon WSA must be considered a supplemental value in itself. The area is a natural, harmonious composition of contrasts. Brilliant yellow fall color and light-colored rock are juxtaposed with the dark green foliage of the evergreen canopy. Distance becomes distorted, difficult to judge because of the immense scale of topographic features, while the detail of weathered rock, small grassland riparian areas, and stark white aspen trees complete a nearly perfect tableau. No one who visits the area leaves without a strong impression of the area's beauty.

Archaeological values are present in the WSA to a largely unknown, speculative degree. A few aboriginal sites have been recorded in the area including a camp site, but the WSA is largely uninventoried. Potential for additional discovery is high.

### Mineral Resources

The Goshute Canyon WSA lies just north of the historic mining town of Cherry Creek. Cherry Creek is the center of the Cherry Creek Mining District, part of which extends into the WSA. Production from the district is reported at \$4.8 million since records were first kept (1902). Prior to that time \$6 million to \$20 million in production has been estimated. Gold was first discovered in 1861 and the town of Cherry Creek boomed around 1883. Production practically ceased by 1893 and the town is now inhabited by only a few individuals. Metals recovered include gold, silver, lead, and copper. In addition, scheelite (tungsten) was mined in several of the old mines including the Chance and the Fillmore. Although potential still exists for tungsten, operations here have been small and sporadic with little production since World War II. A few of these old mines continue to be worked by small-time miners as the market allows, but again with little or no production.

The Goshute Canyon Natural Area was segregated on December 22, 1970, from all appropriation including the mining laws, but not the Recreation and Public Purposes Act nor the mineral leasing and material sale laws.

As of 1983, a total of 160 claims existed within the WSA (refer to Mining Claims and Leases Map). The claims on the south and east are located mainly along the Black Metals and Exchequer faults, and several of these have been mined extensively in the past. Much of the interest in the claims is in the dumps left behind by the previous miners. With current precious metal prices what was once waste is now ore. *In situ* ore deposits also remain, although their extent and content are unknown to the BLM. The ore bodies are mostly vein and replacement deposits, although tungsten occurs in calcite and calcite quartz pods and lenses. The ore bodies are estimated to be too small to be of interest to large modern corporations.

Present mineral interest is primarily in silver, but is also in gold and tungsten. Small mining companies and several individuals have interests in the area. A few individuals have devoted a lifetime to the area and have a way of life dependent upon it.

Based on 1983 GEM information, zones of mineral potential have been delineated as depicted on the Mineral and Energy Potential Map. Although the specific structures within the Cherry Creek District are well known and therefore may have been completely explored, the possibility of areas within the district with good prospecting potential remains. The area of high mineral potential in the south of the unit (5,731 acres) is for silver, copper, lead and tungsten and is so designated because of the productive mines and high number of prospects and claims. The area to the north of this is shown to have moderate potential due to its proximity to the producing area and its structural complexity. The moderate classification also covers an area of jasperoid, a target material for Carlin-type gold deposits. Total moderate potential is 18,733 acres. The remainder of the WSA has low potential for mineral deposition, based on the absence of claims, prospects, or favorable combinations of lithology and structure.

#### Energy Potential

The entire WSA has low potential for oil and gas. The underlying stratigraphy of most of the unit is older than the oil reservoir objectives which presently produce in the Basin and Range Province. A few oil and gas leases are located in the north and northeast portions of the WSA. These cover approximately 8,500 acres. Refer to the Mining Claims and Leases Map.

Moderate geothermal potential exists along the range front on the east side, primarily outside of the WSA boundary. Approximately 1,500 acres of potential exists within the WSA. The remainder of the area has low geothermal potential.

## GOSHUTE CANYON

### Livestock Grazing

The majority of the vegetation in the southern half of the Goshute Canyon WSA consists of pinyon pine, juniper, bristlecone pine, limber pine, and mountain mahogany. The lack of palatable forage, steep slopes, and rough terrain combine to render most of this portion of the WSA unsuitable for grazing. The northern half of the WSA is more suitable for grazing where few areas are inaccessible for grazing and there is more palatable forage. Cattle are grazed in the Indian Creek Allotment on the north and Cherry Creek Allotment on the east portion of the WSA. Sheep are primarily grazed on the Goshute Basin and Medicine Butte Allotments on the west side. (See Appendix C.)

Within the WSA are three drift fences totalling 1-3/4 miles, three spring developments with associated troughs, and two pipelines totalling 4-1/2 miles up Carlson and Log Canyons.

### Woodland Resources

About 16 percent or 5,600 acres of the WSA is manageable woodland. It contains about 1.2 percent of the manageable woodland in the Egan Resource Area. Although much of the area is forested it is too steep and rugged for forest harvest. The Goshute Canyon Natural Area has already resulted in a 5,009-acre woodland product harvest withdrawal within the WSA. The WSA has been used in the past by the few families living in Cherry Creek for Christmas trees and fuelwood. There is some evidence of historic logging about 80 years ago.

### Recreation Values

The Goshute Canyon WSA is a popular area for a variety of recreation activities. The area receives about 1,200 recreation visits per year. Use areas include the Paris Canyon Road, the Upper Basin, Goshute Creek, and Goshute Cave.

Hunting for mule deer occurs from August through October for bow hunters, blackpowder hunters, and rifle hunters. Sage grouse season only lasts for one week in early September, but it is a time of intense hunting activity along Paris Road and in upper Goshute Basin. Hunts within the WSA are usually associated with camping trips. Camping occurs during the summer and fall, mostly concentrated in the upper basin, along Paris Road and at the lower end of Goshute Creek. Fishing for Utah cutthroat trout occurs infrequently, but throughout the year. Trapping in the WSA occurs from about mid-September until late winter for coyotes, and from mid-December until early February for bobcats. Trappers utilize every accessible canyon within the WSA. Goshute Cave along the eastern side of the WSA receives regular use by cavers at the rate of about 250 visits per year.

Wildlife Resources

The Goshute Canyon WSA provides important habitat for a large number of species. Raptors roost or nest in the area and include great horned owls, prairie falcons, golden eagles, red-tail hawks, Cooper's hawk, and kestrels. Although as yet unconfirmed, it is believed that bald eagles and peregrine falcons roost in the area.

Deer habitat totals about 23,800 acres (6,750 acres spring range, 11,500 acres summer range, 3,950 acres winter range, and 1,600 acres yearlong range). Recent elk sightings have been made in the WSA. Antelope occur on the Steptoe Valley bench on the east side of the area where there are about 1,900 acres of identified habitat. Populations of Hungarian partridge, sage grouse, and blue grouse (with 7,308 acres of identified habitat) exist. (See Map 22.) A state sensitive species, the Bonneville cutthroat trout, occurs in Goshute Creek. Other species present are mountain lions, bobcats, and yellowbelly marmots, as well as others that commonly occur in the region.

Threatened or Endangered Species

Peregrine falcons and bald eagles, listed as endangered species, may be observed in the Goshute Canyon WSA on occasion. The spotted bat and the Utah Bonneville cutthroat trout (Category 1 Sensitive species) are found within the WSA. These two species are discussed above under Special Features.

Lands

A 15-acre mineral patent (no. 2685) lies surrounded by the WSA in the southern end. There are no other private inholdings in the WSA. Several private tracts lie adjacent to the boundary. Much of the southern boundary is based along the edges of patented mining claims.

**PARK RANGE WSA  
NV-040-154**

General Environment

The Park Range WSA (47,268 acres) is located approximately 70 air miles southwest of Ely along the border between the Ely and the Battle Mountain BLM Districts in Nye County. Most of the WSA is made up of rugged, mountainous terrain with some benchland around the periphery of the unit. Elevation ranges from 6,400 feet to 9,058 feet on Park Mountain. There is a great deal of exposed volcanic rock throughout the WSA, and this makes it an exceptionally rugged area even though its peak elevations are under 9,500 feet.

## PARK RANGE

The area also sustains heavy forest cover made up primarily of pinyon pine, juniper, and mountain mahogany with some aspen and lesser amounts of cottonwood intermixed. There is also a relatively large amount of wet meadow vegetation that occurs in the high mountain meadows scattered throughout the area, some above 8,500 feet, all above 8,000 feet. These sustain a rich and diverse mixture of wildlife. Surface water is unusually plentiful in the area because the volcanic rock prevents downward percolation into the deep ground water system.

### Wilderness Values

Naturalness: The Park Range WSA is in a substantially natural condition in a setting removed from the effects of civilization. The Park Range runs northeast to southwest through the unit. This is an extremely rugged range characterized by rocky peaks interspersed with pristine mountain meadows.

The south-central portion of the unit is the most rugged and pristine. The steep topography and the rugged terrain has in the past, and will in the future, limit access into the area.

Generally, all man-made intrusions were considered significant, and were excluded from the area during the intensive inventory. Several cherrystemmed routes which enter the unit from border roads, provide access to maintain spring developments, a pipeline, fences and a corral. These routes also provide general access for ranchers, hunters, and others. The routes and improvements all have an impact on the naturalness of the area. Their impact, however, is minimal and peripheral in the WSA, and is only noticed when one is within their immediate vicinity.

An old uninhabited cabin is included within the WSA at the northern tip. It has no modern improvements associated with it and does not detract from the naturalness of the area.

A portion of a seeding totalling approximately 40 acres is within the WSA on the northwest side. The seeding was put in along contour lines and the general slope appears natural in the landscape, but the abrupt edges and composition of grasses make it appear slightly unnatural.

Solitude: The Park Range WSA is 47,268 acres in size. This, in combination with the other factors discussed below, provides outstanding opportunities for solitude throughout the unit.

The Park Range WSA is approximately 16 miles long and ranges from two to eight miles in width. The general configuration of the area enhances opportunities for solitude. Topographic screening in the core of the unit is provided by the highly dissected and irregular Park Range mountains and includes steep canyons; large rock outcrops, both vertical and horizontal; and open, park-like meadows which combine to form a diversity of topography. The terrain around the base of the range varies from flat to gently rolling. The topographic screening by itself provides outstanding opportunities for solitude.



Vegetative screening is provided by pinyon, juniper and mountain mahogany which completely cover portions of the unit. Tree density ranges from heavy on the forested slopes, to none in the isolated open meadow areas. The vegetation provides excellent screening and enhances opportunities for solitude.

Users within this area would have excellent opportunities to avoid others and find a secluded spot. The topographic and vegetative screening coupled with the size and configuration of the area would provide for maintenance of solitude opportunities, while sustaining general wilderness use which is expected to be light. Some interaction among users might occur at destination points including Park Mountain (the highest peak), at the springs and in the park-like meadows. Access into the core of the unit is difficult from any direction. This will tend to limit use and enhance opportunities for solitude. Opportunities for solitude are also enhanced by the fact that the area is so remote.

Primitive Recreation: The Park Range offers outstanding opportunities for primitive and unconfined types of recreation throughout the unit. The abundant water enhances opportunities for hiking, camping, nature study, photography, etc.

Special Features: The variety and significance of the special features in the Park Range contribute to the area's suitability as wilderness. These features include archaeological and historical sites, pristine mountain meadows, wildlife values and wild horses.

Known archaeological resources include aboriginal sites such as lithic scatters, isolates and possible camp sites. Historic sites bordering the WSA consist of the Overland Stage Routes and Stations including Pritchard's Station, Summit Station and Hick's Station (currently inhabited).

There are several vegetative communities within the Park Range WSA which are of scientific interest as comparison or relict areas because of their apparent pristine condition. Although the meadows examined thus far show signs of historic use by horses, there is no evidence of use by cattle or sheep in the range. Because the limited evidence of use and the rugged terrain, it is possible that some of the mountain meadows abundant in the WSA are in a pristine condition, a rare occurrence within the Ely District and perhaps in the state.

Wildlife values consist of eyries for Goshawk, prairie falcon, golden eagle, kestrel, and Cooper's hawk. The eyries are located in the higher, mountainous portion. These would be of interest to sightseers and for scientific interests. This WSA is very important as a nesting area for these species. The endangered peregrine falcon can also occasionally be seen.

## PARK RANGE

Wild horses can be seen occasionally on the benchlands and lower elevations throughout the year within the WSA. They are part of the Sand Springs Herd Unit and this area is important to the herd. Users would likely enjoy viewing wild horses.

### Mineral Resources

The Park Range is a northeast trending, east tilted continuous fault block composed primarily of unaltered Tertiary volcanic units with outcroppings of Paleozoic sedimentary rocks occurring only in small areas at the north tip of the range (GEM, 1983).

The Morey Mining District occurs about five miles to the southwest of the Park Range. In the last half of the 19th century, about \$500,000 worth of silver was produced in this district. Within the WSA, there is no history of mineral production. No metallic mineral occurrences or mineralized areas are known within the WSA. As of 1983, no mining claims existed within the Park Range WSA.

The entire WSA is rated as having low potential for metallic minerals primarily because it is covered by unaltered Tertiary volcanics that bear no anomalous geochemical signature. Some of the underlying Paleozoic sediments, which include limestones and dolomites, may be favorable for the accumulation of metallic mineral resources.

### Energy Resources

Potential for oil and gas is low. Sections of thick Tertiary volcanics and overlying valley alluvium cover the area. However, some potential is present as evidenced by extensive faulting which has revealed strata of the Paleozoic age miogeosyncline, which may include oil and gas sources and reservoirs. As of 1983, 2,900 acres of the WSA were covered by oil and gas leases.

The bench areas on both the east and west have moderate geothermal potential, based solely on geologic inference. Thermal occurrences exist in wells and springs a few miles outside of the WSA and similar geologic conditions exist in the WSA. This potential occurs on 22,230 acres. Refer to the Mineral and Energy Potential Map.

### Livestock Grazing

The Park Range WSA has low value for livestock grazing. On the slopes that are accessible, most of the vegetation is comprised of pinyon pine, juniper, mountain mahogany and various species of sagebrush. Though vegetation on the remaining areas is more palatable, these areas are not accessible to livestock. Examples of these inaccessible areas are the small meadows and sagebrush/grass basins located to the south of Cottonwood Peak. Portions of four grazing allotments cover the WSA. (See Appendix C). Three allotments to the south and west are utilized by cattle. In the fourth, sheep are trailed along the east benches. Most existing projects have been excluded from the WSA. About 40 acres of a seeding occurs within the western boundary of the WSA.



Woodland Resources

About 20 percent (9,500 acres) of the WSA is manageable woodland. It contains approximately 2 percent of the manageable woodland in the Egan RA. Although the area has usable forest products, use in the past has been low because of the area's remoteness.

Recreation Values

The Park Range WSA currently receives little recreation use but offers an abundance of backcountry recreation opportunities. Most current use is by hunters and trappers. The area is remote and access into portions of it is difficult. The carrying capacity of the WSA is fairly low. It will be able to absorb some increased use, but not large numbers. It is not expected, however, that there will be large increases in use in this WSA.

Wildlife Resources

The Park Range WSA hosts several species of wildlife including Cooper's hawks, goshawks, prairie falcons, golden eagles, and kestrels. There are about 11,600 acres of deer yearlong range and about 7,550 acres of antelope yearlong range. Sage grouse, blue grouse, yellowbelly marmots, mountain lions and bobcats also occur. The Park Range is a possible desert bighorn sheep release area.

The Park Range wildlife habitat is like the area itself, undisturbed by human activity.

Lands and Realty

There are no private inholdings within the Park Range WSA. One tract of private land, Pritchard's Station (an old stage stop) lies adjacent to the WSA boundary on the south end.

## RIORDAN'S WELL WSA

NV-040-166

General Environment

The Riordan's Well WSA (57,002 acres) is located approximately 50 miles southwest of Ely and includes a portion of the Grant Range. The central part of the WSA is comprised of forested mountains of the Grant Range. Forest cover is primarily pinyon pine and juniper, with smaller stands of ponderosa pine, white fir, aspen, mountain mahogany, and cottonwood. The mountains fall away to the valley floor on either side (east and west), and also taper to foothills on the north and to a low mountain pass on the south. The valley and some bench portions on the east and west are treeless, sagebrush-covered areas.

## RIORDAN'S WELL

Elevation in the WSA ranges from below 5,000 feet to 9,352 feet on Heath Peak. Wildlife in the area is highly diverse, and includes mountain lion, gray fox, several raptor species, mule deer, and bighorn sheep.

### Wilderness Characteristics

**Naturalness:** The Riordan's Well WSA is in a very natural condition except for the northern tip and the southeast crescent. The unit contains a core area of rugged mountains. It includes at least 18 peaks over 8,000 feet in elevation, with Heath Peak being the highest at 9,352 feet. Ponderosa pine and other conifers can also be found in canyons in this high country. The mountainous area is concentrated in the central and southwestern portions of the unit. The remainder of the unit is mostly low rolling mountains and alluvial fans.

Generally, all man-made intrusions were considered significant and were excluded from the WSA. These include two spring developments, a fence line and 15 cherrystemmed routes. These routes are concentrated in the southeastern crescent of the unit and, although technically excluded, they impair one's feeling of naturalness in small portions of the area. The terrain allows for easy access in this area and new routes are easily formed by vehicle passage. Use associated with hunting, mineral exploration, and ranching are the main causes of these routes. This type of use is difficult to control.

**Solitude:** Opportunities for solitude vary from fair to excellent based on individual factors. However, the factors of size and topographic and vegetative screening in combination offer an outstanding opportunity for solitude over much of the unit. The size of the area (57,002 acres) contributes to the opportunities for solitude. The area is roughly crescent-shaped and varies from two to twelve miles across. Except for the northern portion which is narrow, the configuration enhances opportunities for solitude.

Topographic screening is provided by the mountains, hills, rock outcrops and rolling alluvial fans. Most of the core of the area is mountainous and dissected by steep canyons. The mountainous portion is complex and not dominated by a single ridgeline. Topographic screening here is outstanding. The quality of the screening decreases, however, as one moves from the mountains to the rolling hills. Screening is almost nonexistent in the valley portions.

Vegetative screening is provided primarily by the mixed pinyon and juniper woodlands. There are stands of ponderosa pine and white fir along the western slopes located in the higher elevations. The pinyon and juniper are dense with larger growth in the southern two-thirds of the WSA and less dense with smaller growth along the eastern periphery and in the northern third. The alluvial fans making up the eastern part of the unit are covered with low vegetation and do not provide very effective vegetative screening. Overall, outstanding solitude can be found within much of the unit as a result of the combination of vegetative and topographic screening.

Impacts of outside sights and sounds on solitude would stem primarily from the infrequent vehicle use on the perimeter roads and cherrystemmed routes. The area along the southeastern portion of the crescent would potentially be most severely affected from these outside sights and sounds since this is where the majority of cherrystemmed routes exist. Impacts of other outside sights and sounds would not impair opportunities for solitude.

Users within the area would have good opportunities to avoid contact with others. The combination of screening and size would provide for insurance of a high degree of solitude while sustaining wilderness use. Should there ever be heavy use, some interaction among users can be expected at staging areas and at destination points such as Heath Peak, the highest point. Use may be somewhat restricted since the area is removed from large population centers.

Primitive Recreation: Riordan's Well WSA offers very good opportunities for primitive recreation. However, neither the diversity nor the quality was considered to be outstanding. Hiking, cave exploration and wildlife viewing are some of the best activities although many recreational opportunities can be undertaken in the WSA.

Special Features: The types and quality of special features including ponderosa pine, caves, wild horses and wildlife values add to the suitability of a portion of the Riordan's Well WSA as wilderness.

Numerous stands of ponderosa pine are located along the north and western slopes of the high country. These are viable stands with reproduction occurring. They would be of interest to wilderness users and are valuable as seed sources and as a source of genetic diversity.

The wild horses are part of the White River Herd Unit. Approximately 25 horses spend part of their year within the WSA. This area is important to the horse herd. Users would likely enjoy wild horses.

A cave (Thunder Cave) is of unknown quality. It has been visited by Ely District personnel, but the full extent of the cave is not known. Other cave openings have been spotted but not explored.

Wildlife values consist of mule deer, bighorn sheep, upland and small game as well as eyries for golden eagle, kestrels, turkey vultures, red-tailed hawks, great horned and long-eared owls, and prairie falcons. The endangered bald eagle and peregrine falcon can also occasionally be seen in the WSA. Wildlife viewing would be an attraction for visitors within the area.

#### Mineral Resources

The Grant Range, of which the Riordan's Well WSA is a portion, is a northerly trending fault block of Paleozoic sediments that have been complexly thrust, faulted, and locally overlain by Tertiary volcanics (GEM, 1983).

## RIORDAN'S WELL

The major mountain formation in the area occurred in the mid-Mesozoic time. The first part of this phase was associated with low-grade regional metamorphism, the latter part with eastward thrusting of Paleozoic sediments. The upper plates of these thrusts are cut by high angle faults, both normal and reverse, and most occurred after the thrusting.

Following this period, extrusions of welded tuffs, flows, and breccias occurred. Volcanism also occurred during the Quaternary period.

There is no recorded production from within the Riordan's Well WSA. Southwest of the WSA is the Troy Mining District where a recorded production of \$1 million in gold has occurred. An unknown quantity of tungsten was produced from the nearby Nye and Terrell Mines. There are no known mineral occurrences or prospects in the WSA.

There are three blocks of claims located within the WSA, two along the southern border and another in the central portion. As of 1983, a total of 91 claims existed within the WSA.

Within the WSA there is one small area where contact metamorphism may have contributed to the concentration of tungsten or gold as it did to the north. A thrust plate noted in the western portion of the WSA, subjected to the proper hydrothermal influence, could provide for the same potential as observed, for example, in the jasperoid breccia at the Gold Point Mine. This area (2,950 acres), therefore, has been rated as having moderate metallic mineral potential. The remainder of the WSA has been rated as having low potential for metallic mineral resources (GEM, 1983).

### Energy Resources

The valley portions, totalling 10,064 acres of the WSA, have low potential for oil and gas. The mountainous portion has virtually no potential. About 27,000 acres of the WSA are leased for oil and gas.

Oil and gas exploration activity is strong to the east of the WSA in White River Valley, but interest seems not to extend into the WSA itself. (Refer to the Mining Claims and Leases Map.) Several fields in Railroad Valley to the west have produced oil since the early 1950's. Interest continues in this area.

There are no known geothermal occurrences in the WSA, but several warm springs are located from within 5 to 15 miles of the WSA boundary. Temperatures range from 72° F. to 100° F. There are no geothermal leases in the WSA.

### Livestock Grazing

The large expanses of dense pinyon-juniper woodland and rough terrain which cover much of the study area are the main factors contributing to its overall low value for livestock grazing. About 3,000 acres on the lower east slopes have greater value for grazing since they have more palatable vegetation and less severe terrain. Portions of five grazing allotments are included within the WSA boundary. Cattle are grazed on four of these allotments. One of the allotments is reserved for wildlife and livestock grazing does not occur here. Refer to Appendix C. All range improvements have been cherrystemmed from the area. The only proposed improvement is a well in Dry Basin (T. 7 N., R. 57 E., sec. 36, NW¼). There are ten undeveloped springs in the unit.

### Woodland Resources

About 31 percent, (17,892 acres) of the WSA is manageable woodland. It contains about 4 percent of the manageable woodland in the Egan RA. Pine nuts and fuelwood have been taken from this area in the past, mostly by local ranchers since the WSA is fairly remote. There is, however, unauthorized woodcutting occurring within the WSA in the north and east portion.

### Recreation Values

The Riordan's Well WSA receives very little recreation use, but has good opportunities for primitive backcountry recreation. Most current use in the area is by hunters and trappers. The area is relatively remote.

### Wildlife Resources

Wildlife in the Riordan's Well WSA includes mountain lion and bobcat, ringtail cat, gray fox, and several species of raptors (golden eagles, kestrels, turkey vultures, red-tailed hawks, great horned and long-eared owls, prairie falcons). There are 48,000 acres of high density deer winter range within the WSA. This habitat is crucial to get large numbers of deer through the winter. Bighorn sheep from the adjacent USFS Grant Range unit range into the WSA as do elk.

### Threatened and Endangered Species

The endangered bald eagle and peregrine falcon can occasionally be seen in the WSA.

Several state-listed sensitive species are found in the WSA. These include the ferruginous hawk and the oneleaf Torrey milk-vetch (Astragalus calycosus var. monophyllidius). Refer to Appendix D.

### Lands and Realty

There are no private inholdings in the Riordan's Well WSA.

## SOUTH EGAN RANGE WSA

NV-040-168

### General Environment

The South Egan Range WSA (96,916 acres) is located approximately 25 miles south of Ely in the Egan Range in White Pine, Nye, and Lincoln Counties. This WSA is made up primarily of forested, mountainous terrain with some associated bench and valley land. The mountains, formed by thrust and normal faulting, are made up mainly of Paleozoic rocks, some of which form a large series of spectacular cliffs on the west side of the range. The high point in the WSA rises above 9,600 feet, while parts of the area lie near 5,600 feet. Tree cover is dense in many places and primarily made up of pinyon pine and juniper, although the higher elevations support stands of white fir and limber and bristlecone pine. Riparian areas and wildlife are very abundant, and wildlife species include high mule deer populations, elk sage grouse, blue grouse, quail, mountain lions, bobcats, eagles, kestrels, hawks, owls, and falcons.

### Wilderness Characteristics

Naturalness: The high country of the South Egan Range is in a very natural condition. Other portions of the WSA appear unnatural and are adversely affected by the presence of cherrystemmed routes and range developments.

The WSA includes the rugged high country of this portion of the Egan Range and some of the foot hills area. The high country is quite scenic because of the limestone cliffs and conifer forests. Much of the west side of the range between Brown Knoll and Sheep Pass Canyon is virtually impenetrable because of the sheer limestone cliffs.

Much of the area, however, is adversely affected by man's imprints. Around the base of the unit and extending into the interior are 39 cherrystemmed routes. At least six of the routes extend for 5 miles or more into the WSA and three come to within 1 mile of each other in the high country. They are cherrystemmed and technically out of the area but their presence does affect the feeling of naturalness. There are also numerous range developments such as fence lines and stock ponds associated with the cherrystemmed roads. A radio transmission structure is located on the southwest edge of the WSA. It is situated on a hill, painted white, and creates a visual impact within its immediate vicinity.

Solitude: The South Egan Range WSA is approximately 26 miles long and 3 to 9 miles wide encompassing 96,916 acres. The large size of the WSA in combination with other factors discussed below provides outstanding opportunities for solitude within several portions of the WSA.

The configuration is severely affected by cherrystemmed routes, several of which nearly join in the central portion of the WSA. This creates a narrow roadless corridor through the WSA's center. Solitude is impaired by the presence of these routes and the vehicles using them.



Topographic screening is provided by the rolling hills around the perimeter and the steep mountains of the interior, especially in the central part where massive limestone cliffs and bluffs provide effective screening and barriers. The southern one-third of the mountainous area includes an open bowl (Long Canyon) between high mountain ridges. The northern one-third is generally mountainous, but lacks the spectacular bluffs of the central portion. Topographic screening greatly enhances opportunities for solitude within most of the WSA except for the rolling hills.

Vegetative screening is provided primarily by pinyon, juniper and mixed conifer woodland. The eastern benches have fairly dense stands of pinyon and juniper. The mountainous portions have dense stands of pinyon, juniper and mixed conifer interspersed with open areas and meadows. Mountain mahogany and aspen are present in small, scattered stands throughout the unit. Most of the WSA has effective vegetative screening which enhances opportunities for solitude.

Users within the area would have excellent opportunities to avoid contact with others and find a secluded spot. The combination of topographic and vegetative screening with the size and configuration of the area would accommodate users while maintaining opportunities for solitude. Interaction among users can be expected at staging areas, at springs, in the upper meadows, at the highest peaks and at specific attractions such as Angel Cave or the bristlecone pine areas.

Primitive and Unconfined Recreation: The variety and quality of recreational pursuits make the area outstanding in the opportunities offered for primitive recreation. Recreation activities include backpacking, hunting, nature study, horseback riding, rock climbing, technical climbing and spelunking. The area provides a diversity of terrain, ecosystems, and scenic vistas which enhance hiking, horseback riding and nature study. The central third of the unit includes massive limestone cliffs which provide the full range of challenge opportunities for rock climbing and technical climbing. Hunting is good for mule deer and mountain lion since there are moderate to high populations of these species. Spelunking opportunities are available at Angel Cave in the top of the Egan Range and the potential for discovering other caves is good.

Access into the core of the unit ranges from quite difficult to quite easy. Access is difficult in the northern portion, but fairly easy via the cherrystemmed roads which reach into the southern and central part of the unit.

Special Features: The variety, extent and significance of the special features enhance the wilderness values of the WSA. The area contains bristlecone pine, Angel Cave, massive limestone cliffs, archaeological features, and wildlife values.

The bristlecone pine occur in places along the ridgeline.



## SOUTH EGAN RANGE

Angel Cave is a pit cave of undetermined significance, approximately 100 feet deep. It's location is unusual because it is at the top of the Egan Range, just under 9,000 feet. Nearly all limestone solution caves occur at a lower level where the ground water accumulates.

The massive limestone cliffs that run along the west side of the WSA are significant in their scenic and geological value. They also provide quality recreational opportunities.

Cultural values include several large lithic scatters and one quarry site. Much of the area has a very high potential for the occurrence of archaeological sites. The recorded archaeological values are fairly extensive.

Wildlife values include big game, small and upland game as well as raptor eyries for red-tail hawks, prairie falcons, golden eagles, kestrels, great horned and long eared owls. These are located along the limestone cliffs. Turkey vultures nest in the area. This WSA also includes the highest density prairie falcon nesting area in the Ely District. Small numbers of Gambel's quail can also be found within the WSA. They are an unusual occurrence within the Ely District and are confined to the lower foothills, springs, and riparian areas.

### Minerals and Energy

The Egan Range is a northerly trending fault block composed of Paleozoic carbonate sediments that have been deformed by thrust and normal faulting. Tertiary volcanic units locally overlie the older sediments. Rock units within the WSA include the Prospect Mountain Quartzite, the Pioche Shale, the Pogonip Group, the Devonian Sevy Dolomite, the Guilmette Formation, the Devonian-Mississippian Group, Pilot Shale, and others. Structural features in the WSA include Early-Middle Paleozoic upwarping, Late Mesozoic-Early Cenozoic thrusting, large pre-Eocene reverse faults, low-angle Oligocene-Miocene normal faults and Pliocene-Pleistocene Basin and Range normal faulting (Gem, 1983).

The Ellison Mining District is partly located in the north end of the WSA. Limited amounts of gold, silver, lead, copper, zinc, and fluorite were produced from the area in the 1930's and 1940's. Production totals were 3 ounces of gold, 801 ounces of silver, 11,427 pounds of copper, 4,325 pounds of lead, and 1,910 pounds of zinc. Rich oxidized near-surface ore has been mined out. Recent exploration was conducted in the district by U.S. Borax, but results were not encouraging.

Mining claims are located on the north end of the WSA in the Ellison District and on the northwest bench just east of Lund. As of 1983, a total of 51 mining claims existed within the WSA. Ore bodies in the Ellison District occur as contact metamorphic deposits associated with volcanic stocks or plugs. In the claim group east of Lund, disseminated precious metals occur in a volcanic porphyry.

A zone on the north end of the WSA totalling 802 acres has high potential for base and precious metals. A zone of moderate potential for base and precious metals totalling 7,633 acres lies just south of the high potential area. (Refer to Mineral and Energy Potential Map.)

East of Lund, disseminated gold has been discovered although its grade is subeconomic at this time. The remainder of the WSA has low potential for metallic minerals (GEM, 1983).

Potential for nonmetallic minerals is high in the Ellison District because of the fluorite present along narrow veins in both limestones and Tertiary volcanics. Moderate potential occurs on the bench areas for sand and gravel.

#### Energy Resources

The entire WSA has low or no potential for oil and gas resources (GEM, 1983). Oil and gas leases are held on about 45,000 acres of the WSA. (Refer to Mining Claims and Leases Map.)

Twenty-two exploratory oil and gas wells have been drilled in the valleys surrounding the WSA. Several have had shows, however, there is no current production.

A small (328 acre) portion on the southwest bench at Emigrant Springs has moderate geothermal potential (refer to the Mineral and Energy Potential Map). The thermal water here is measured at 70°F. The remainder of the WSA has low potential for geothermal resources (GEM, 1983).

#### Livestock Grazing

The western mountain portion of the study area is generally unsuitable for grazing (except for some bench areas) because of steep, rocky terrain and low-value forage. The eastern slopes are more accessible and vegetated with more palatable species. From late spring through winter these eastern areas receive substantial livestock use with heavy use in canyons containing springs. Portions of eight allotments are within the WSA boundaries. Permittees run primarily cattle in seven of the allotments and sheep in the other. (See Appendix C.) All existing range improvements except for one combination spraying/seeding (1,460 acres) in the Rock Canyon allotment and part of an old chaining (400 acres) in the Brown Knoll allotment have been cherrystemmed from the WSA boundaries. There are approximately 28 undeveloped springs within the WSA.

#### Woodland Resources

About 16 percent (15,000 acres) of the WSA is manageable woodland. It contains approximately 3 percent of the manageable woodland in the Egan RA. The area has been used heavily in the past and present for fuelwood cutting. Historic commercial logging took place in Sawmill Canyon at the turn of the century. Residents of Lund, Preston and Ely use the area for gathering Christmas trees and fuelwood. Unauthorized wood cutting in this area is a problem and signifies a locally heavy demand.

## SOUTH EGAN RANGE

### Recreation Values

This WSA is readily accessible from U.S. highway 318. In addition, several routes extend into the core of the high country from both sides of the area.

This portion of the South Egan Range is a popular area for a variety of recreation activities. The area receives about 1,100 visits per year. Use areas include nearly all accessible portions. The Cave Valley area which borders most of the eastern side is a popular camping and staging area for recreationists while they are in the vicinity.

The primary current use of the area is by hunters and trappers. However, the area hosts many other activities including spelunking, hiking, camping, off-road vehicle use, horseback riding and rockhounding.

### Wildlife Resources

The South Egan Range provides high quality habitat for a number of species. Golden eagles, kestrels, turkey vultures, red-tail hawks, and great horned and long eared owls nest in this WSA. Along the WSA's cliffs, prairie falcons have the highest nesting density in the Ely BLM District. There are about 66,600 acres of deer habitat, including 39,900 acres of deer summer range (24,700 acres of which are key habitat), 26,700 acres of deer winter range (13,500 acres of which are key habitat). Sage grouse occur on about 15,250 acres of the WSA, blue grouse on 17,450 acres. Gambel's quail, mountain lions, bobcats, and occasional elk also occur. The WSA is a potential bighorn sheep transplant area.

### Threatened and Endangered Species

The endangered bald eagle and peregrine falcon can occasionally be seen in the WSA. The ferruginous hawk, a state listed sensitive species, can also be found in the WSA. Refer to Appendix D.

### Lands and Realty

There are numerous private parcels of land that lie adjacent to the WSA forming portions of the boundary. The following seven private parcels totalling 697 acres are surrounded by the WSA:

Parcel No. 1-- T. 10 N., R. 63 E., sec. 3, SW $\frac{1}{4}$ NW $\frac{1}{4}$ ; sec. 4, Lots 1 and 2, SE $\frac{1}{4}$ NE $\frac{1}{4}$  (177.04 acres) White Pine County. The parcel is owned by C B Ranch and has no water rights on record.

Parcel No. 2-- T. 10 N., R. 63 E., sec. 8, SE $\frac{1}{4}$ NE $\frac{1}{4}$ , E $\frac{1}{2}$ SE $\frac{1}{2}$ ; sec. 9, SW $\frac{1}{4}$ NW $\frac{1}{4}$ ; sec. 17, NE $\frac{1}{4}$ NE $\frac{1}{4}$  (200 acres) White Pine County. The parcel is owned by Unelco, Inc. Adams-McGill has the water rights to Willow Spring located on this parcel.

Parcel No. 3-- T. 10 N., R. 63 E., sec. 16, NW $\frac{1}{4}$ SW $\frac{1}{4}$ , (40 acres) White Pine County. The parcel is owned by Unelco, Inc. and has no water rights on record.

Parcel No. 4-- T. 10 N., R. 63 E., sec. 17, SE $\frac{1}{4}$ SW $\frac{1}{4}$ , S $\frac{1}{2}$ SE $\frac{1}{4}$  (120 acres) White Pine County. The parcel is owned by Unelco, Inc. and has no water rights on record.

Parcel No. 5-- T. 11 N., R. 63 E., sec. 16, NE $\frac{1}{4}$ SE $\frac{1}{4}$  (40 acres) White Pine County. The parcel is owned by S & H Ranches and has no water rights on record.

Parcel No. 6-- T. 11 N., R. 63 E., sec. 17, N $\frac{1}{2}$ SW $\frac{1}{4}$  (80 acres) White Pine County. The parcel is owned by S & H Ranches. Barrel Spring is located on this parcel and the water rights are owned by Adams-McGill.

Parcel No. 7-- T. 11 N., R. 63 E., sec. 20, NE $\frac{1}{4}$ NE $\frac{1}{4}$  (40 acres) White Pine County. The parcel is owned by S & H Ranches and has no water rights on record.

In the following sections, surface rights are in public ownership, while subsurface mineral rights are privately held:

T. 11 N., R. 63 E., sec. 16 (40 acres)  
T. 11 N., R. 63 E., sec. 30 (40 acres)

Portions of two Desert Land Entry Applications have been filed on about 300 acres within the WSA in T. 11 N., R. 62 E.

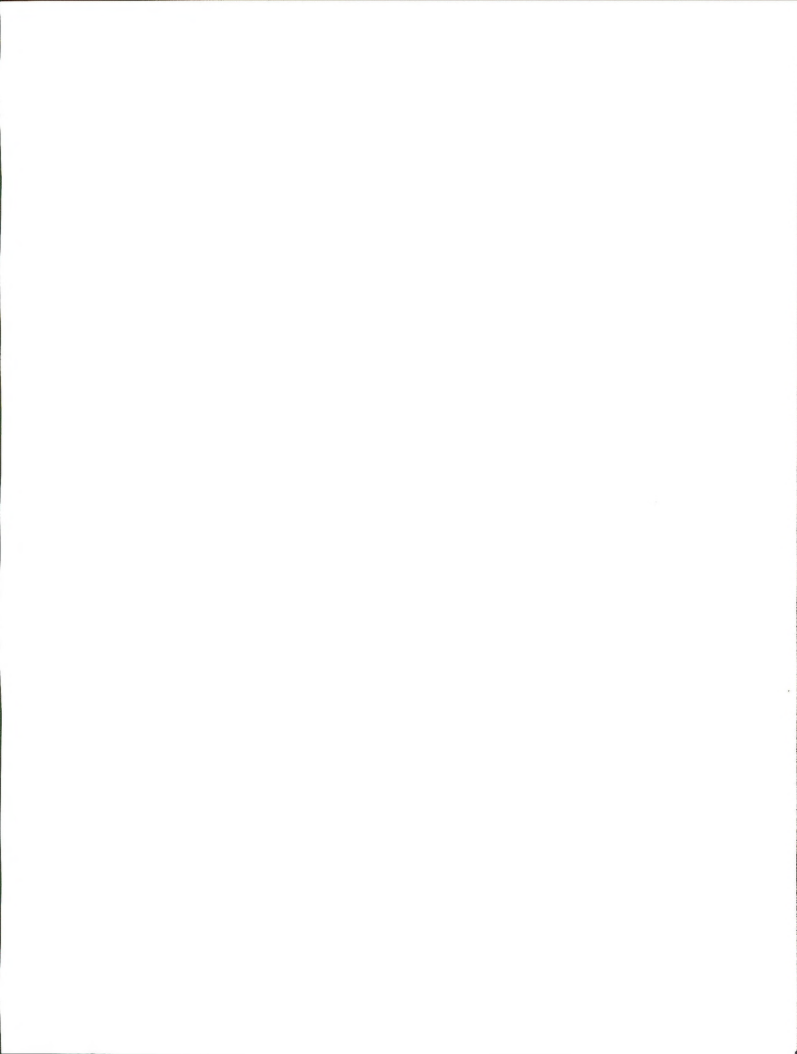
A proposed rail corridor, identified by the developers of the White Pine Power Project, would pass through the South Egan Range WSA on the east side where the WSA touches the Cave Valley road. This corridor is one alternative route for coal delivery to the proposed power plant site in North Steptoe Valley. The corridor was, however, not chosen as the preferred route.

One radio transmission facility exists in the lower foothills on the west side of the WSA. The right-of-way issued for the site and the road leading to it has been cherrystemmed out of the WSA.



## WSA MAPS SECTION

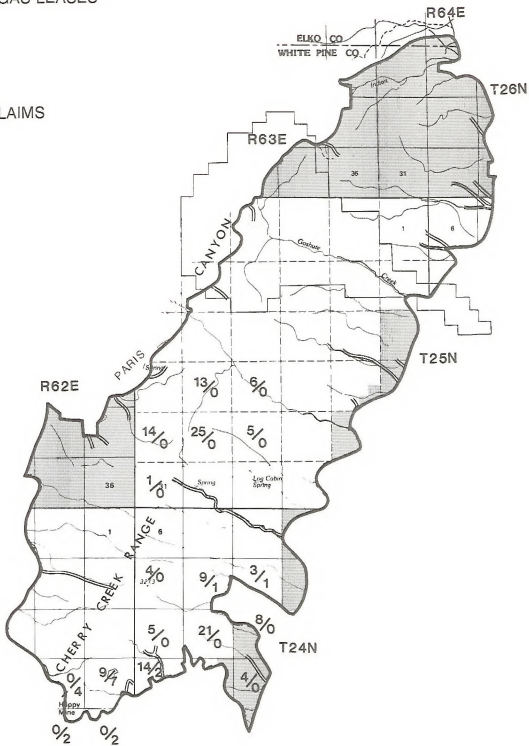








# Goshute Canyon WSA Maps

 OIL AND GAS LEASES

POST / PRE FLPMA CLAIMS

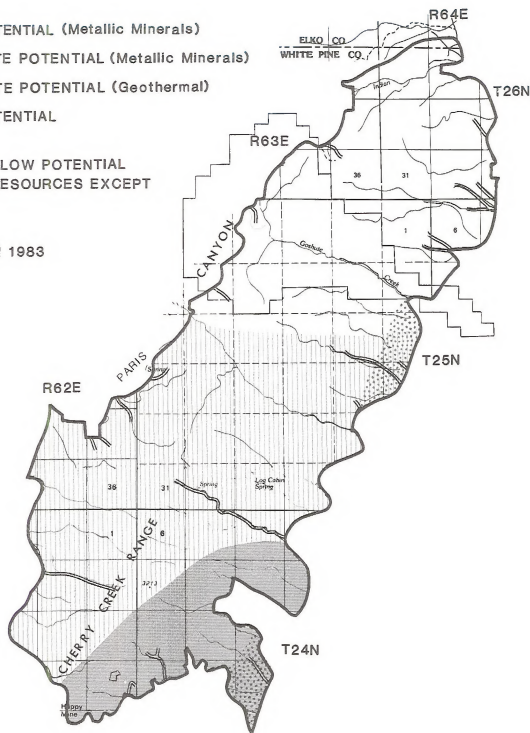


MINING CLAIMS AND LEASES  
GOSHUTE CANYON  
NV-040-015

-  HIGH POTENTIAL (Metallic Minerals)
-  MODERATE POTENTIAL (Metallic Minerals)
-  MODERATE POTENTIAL (Geothermal)
-  LOW POTENTIAL

ENTIRE WSA - LOW POTENTIAL  
FOR ENERGY RESOURCES EXCEPT  
AS NOTED

GEM 1983



0 1 2 3 4  
approx miles

● Cherry Creek

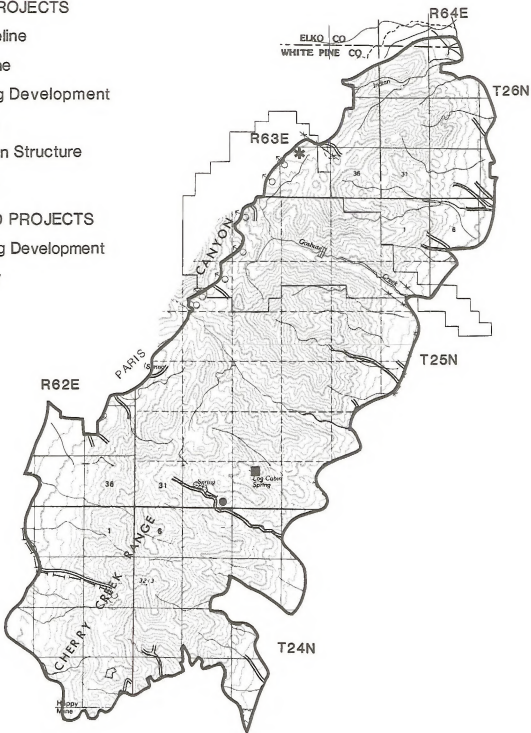
MINERAL AND ENERGY POTENTIAL  
GOSHUTE CANYON  
NV-040-015

**EXISTING PROJECTS**

- Fenceline
- Pipeline
- ⊕ Spring Development
- Cabin
- ◇ Gabion Structure
- Tank

**PROPOSED PROJECTS**

- ⊕ Spring Development
- \* Spray



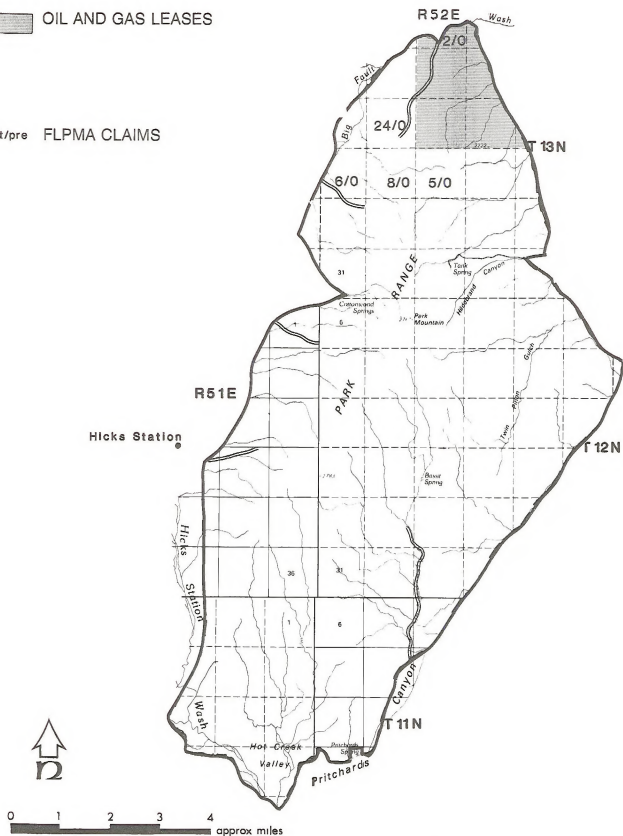
**RANGE PROJECTS  
GOSHUTE CANYON  
NV-040-015**

# Park Range WSA Maps



 OIL AND GAS LEASES

post/pre FLPMA CLAIMS

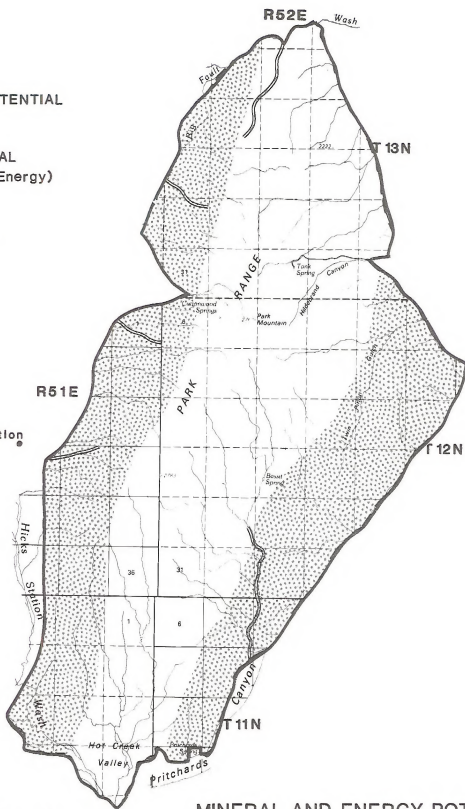


MINING CLAIMS AND LEASES  
PARK RANGE  
NV-040-154

 MODERATE POTENTIAL  
(Geothermal)

 LOW POTENTIAL  
(Minerals and Energy)

GEM 1983



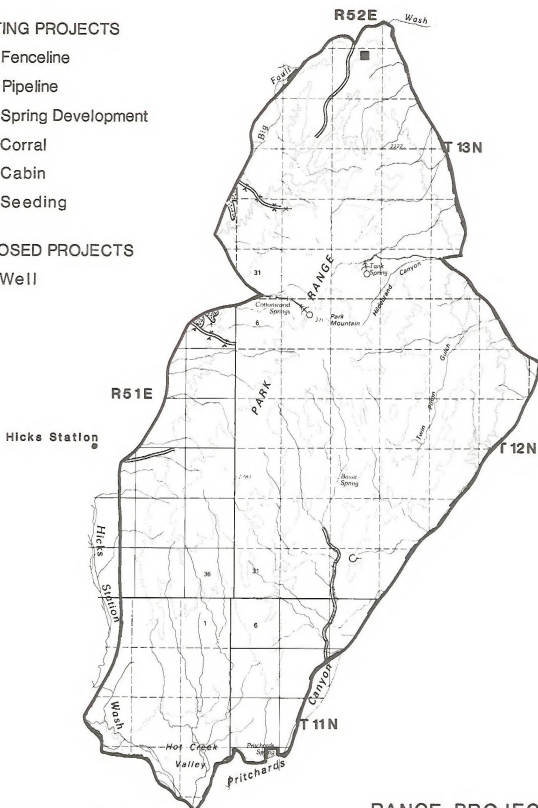
MINERAL AND ENERGY POTENTIAL  
PARK RANGE  
NV-040-154

EXISTING PROJECTS

- \*—\*— Fenceline
- |— Pipeline
- ⊕ Spring Development
- Corral
- Cabin
- ▨ Seeding

PROPOSED PROJECTS

- ⊕ Well



RANGE PROJECTS  
PARK RANGE  
NV-040-154

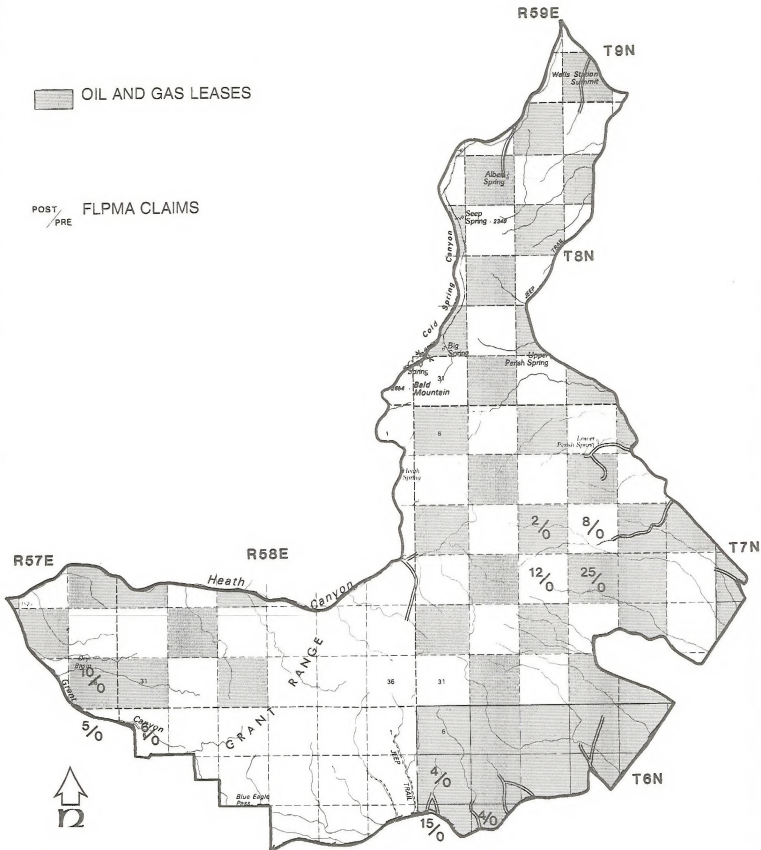
# Riordan's Well WSA Maps

R59E

T9N

 OIL AND GAS LEASES

POST / PRE  
 FLPMA CLAIMS





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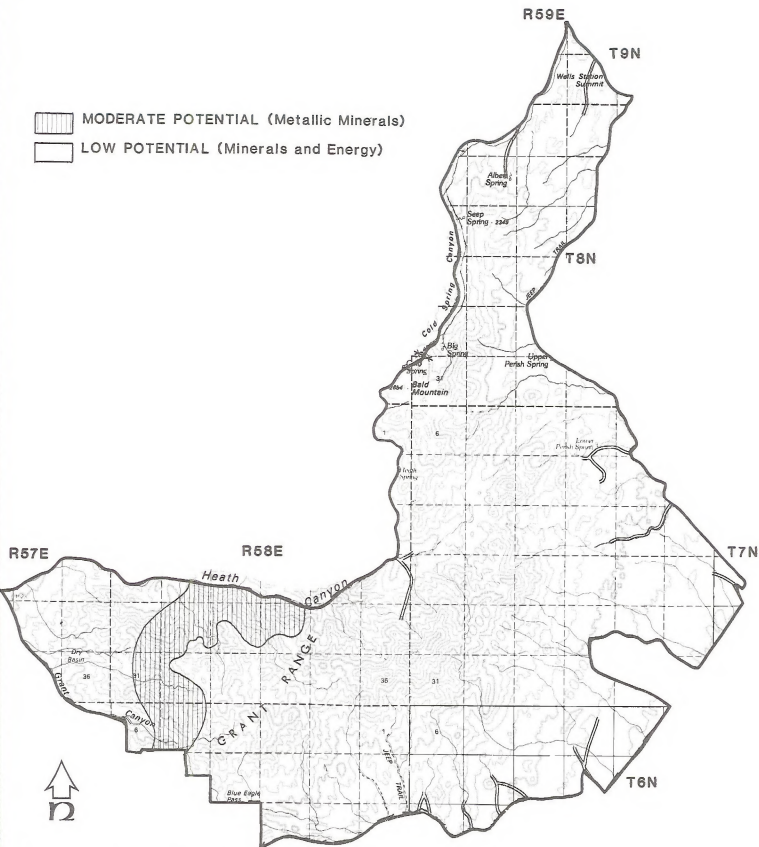
R58E

T7N

T6N

RIORDAN'S WELL  
NV-040-166  
MINING CLAIMS AND LEASES

-  MODERATE POTENTIAL (Metallic Minerals)
-  LOW POTENTIAL (Minerals and Energy)



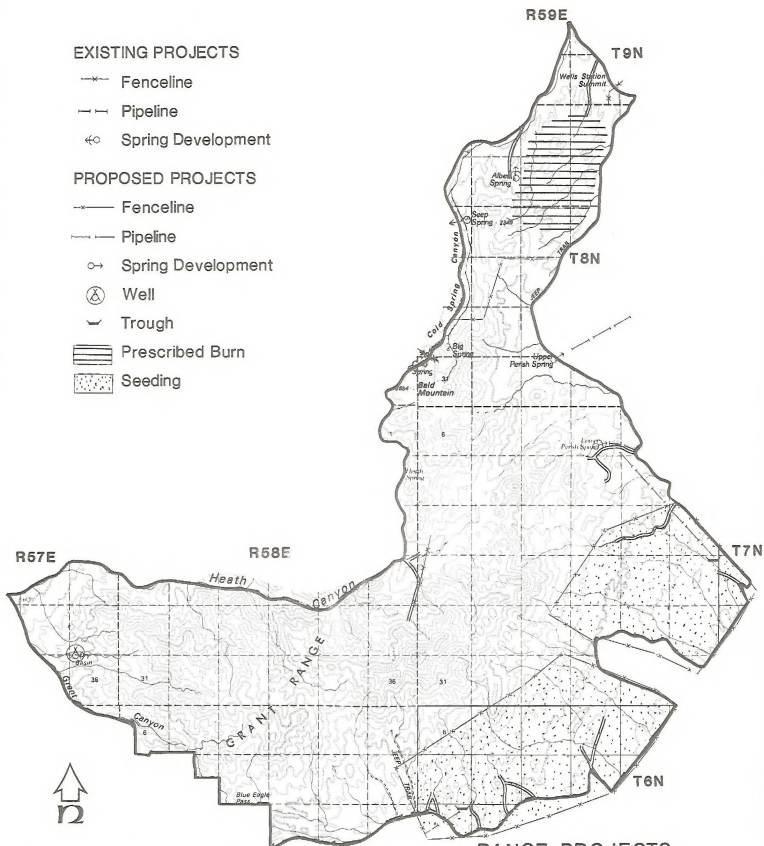
**RIORDAN'S WELL**  
**NV-040-166**  
**MINERAL AND ENERGY POTENTIAL**

EXISTING PROJECTS

- \*— Fenceline
- |— Pipeline
- ⊕ Spring Development

PROPOSED PROJECTS

- \*— Fenceline
- |— Pipeline
- ⊕ Spring Development
- ⊗ Well
- ∩ Trough
- ▨ Prescribed Burn
- ▩ Seeding



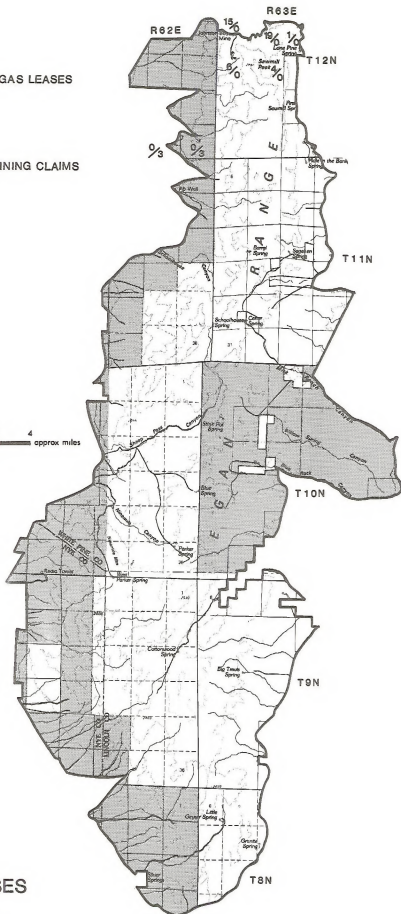
**RANGE PROJECTS  
RIORDAN'S WELL  
NV-040-166**



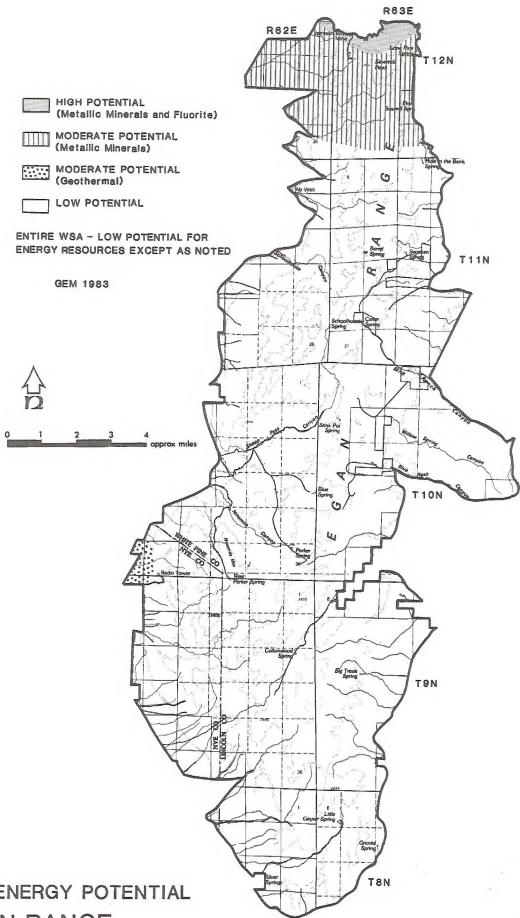
SOUTH EGAN RANGE  
WSA

 OIL AND GAS LEASES

POST/  
PRE FLPMA MINING CLAIMS



MINING CLAIMS AND LEASES  
SOUTH EGAN RANGE  
NV-040-168



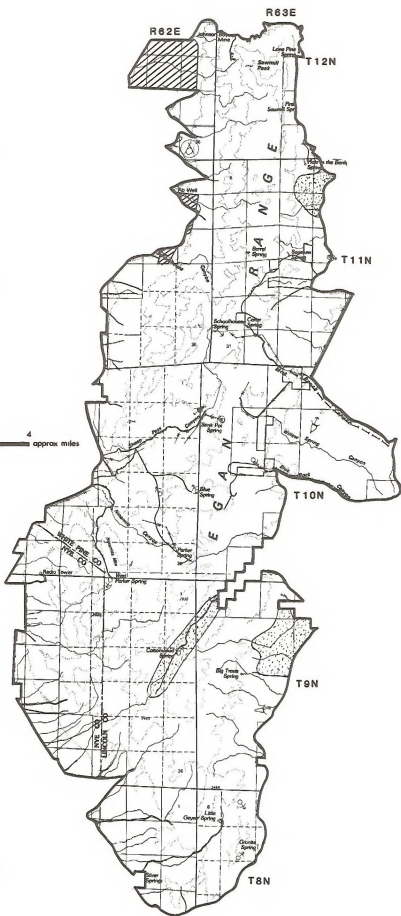
**MINERAL AND ENERGY POTENTIAL  
SOUTH EGAN RANGE  
NV-040-168**

EXISTING PROJECTS

- x— Fenceline
- |-|- Pipeline
- ⊕ Spring Development
- ▶ Reservoir
- ▨ Vegetative Conversion

PROPOSED PROJECTS

- ⊙ Well
- ⊕ Spring Development
- ▶ Reservoir
- ▨ Vegetative Conversion



RANGE PROJECTS  
SOUTH EGAN RANGE  
NV-040-168

## CHAPTER 4

# Environmental Consequences

### INTRODUCTION

This chapter describes the environmental consequences of implementing the different wilderness alternatives. The impacts are summarized in Tables 4-7 in Chapter 2. Only the required elements and the environmental issues (impact topics) that were identified during scoping are discussed and analyzed in this document. The "Scoping" section in Chapter 1 contains a list of the impact topics.

A discussion of the adverse impacts which cannot be avoided, the relationship between short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and the irreversible and irretrievable commitments of resources, can be found following the analysis of each of the proposed actions in this chapter.

All mineral and range development maps referred to in this chapter are located in a separate map section between Chapters 3 and 4.

### GOSHUTE CANYON WSA

NV-040-015

### PROPOSED ACTION (Partial Wilderness Alternative No. 1)

#### Impacts on Wilderness Values

Under the Proposed Action, 22,225 acres of the Goshute Canyon WSA would receive special legislative protection provided by wilderness designation. The remaining 13,369 acres would receive no special protection.

Naturalness (Suitable Portion): Naturalness within the suitable portion of the Goshute Canyon WSA would be slightly impaired in the vicinity of five proposed spring developments. Minor surface disturbance resulting during development of the five spring areas would have a short-term effect on naturalness in their immediate vicinity due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside the fenced area. The presence of fences and troughs would detract slightly from the natural character in their immediate vicinity. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.

There would be a slight, positive effect on naturalness due primarily to the closure of the 22,225 acres to vehicles which would halt the formation of new two-wheel tracks associated with repeated off-road use. Also benefiting naturalness in the suitable portion would be the closure of the area to mineral and energy exploration and development and woodland product harvest.

Naturalness (Nonsuitable Portion): Surface disturbance and construction activities associated with mineral exploration and development of four small underground mines in the southern portion of the WSA would physically disturb and impair the natural character of 63 acres. Due to the already disturbed nature of the land just outside of the WSA boundary in the same area as these mines, the overall perception of naturalness would not be greatly affected.

Naturalness would also be impaired on 2 acres (1 mile) by seismic lines. The wilderness user would see these lines only if they were crossed while hiking or were seen from the high country.

Stumps left by commercial woodcutting, piled branches, and associated two-wheel tracks would detract from the area's naturalness within the 130-acre cutting area on the southwest boundary of the WSA. Due to the thick tree cover the overall perception of naturalness would not be greatly affected by the presence of the cutting area.

Solitude (Suitable Portion): Solitude would be slightly impaired in the immediate vicinity of the range developments for the duration of actual construction activities. Occasional maintenance of the spring developments accessed by vehicle would have a negligible short-term effect on solitude.

Occasional vehicular use of the 7 miles of cherrystemmed routes would detract from the feeling of solitude in their immediate vicinity, especially during hunting season. The low use of recreational vehicles during the remainder of the year lessens the impact.

The reduction of additional mineral and energy exploration and development, and the elimination of woodland product harvest and ORV use would have a positive effect on solitude.

Solitude (Nonsuitable Portion): The occasional blasting, use of heavy equipment, and traffic to and from the four mining sites would detract from the feeling of solitude along the WSA's southern boundary, especially in close proximity to the mines. The duration of each mine is expected to be about 5 years. Solitude would also be impaired from the blasting and helicopters associated with the 5 miles of surface shot seismic line and from the heavy equipment used for the 1 mile of vibroseis lines.

Chain saws and vehicle use would affect solitude in the 130-acre area designated for woodcutting. These impacts would be sporadic based on the cordage, or number of Christmas trees the contractor was permitted to take.

Occasional off-road vehicle use would detract from the feeling of solitude in the nonsuitable portion of the WSA.

Primitive and Unconfined Recreation (Suitable Portion): The impacts described in the solitude section for the suitable area would also diminish the opportunities for primitive and unconfined recreation while they are in progress and the visitor is nearby.

The reduction of additional mining development and energy exploration, and the elimination of woodland product harvest and ORV use would have a positive effect on enhancing the area's opportunities for primitive and unconfined recreation.

Primitive and Unconfined Recreation (Nonsuitable Portion): The presence of ongoing mining operations, woodland product harvest, and ORV use would diminish the opportunity for primitive or unconfined recreation for those visitors in the vicinity of these operations.

Special Features: The area's special features, the bristlecone pine, archaeological values, Goshute Cave, and Bonneville cutthroat trout are mostly located within the suitable portion of the WSA and would receive the added protection from tighter restrictions on surface disturbing activities within wilderness. The bristlecone pine located in the nonsuitable portion would still be protected.

CONCLUSIONS: The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, special geologic features, stands of bristlecone pine, and Bonneville cutthroat trout habitat. Long-term negative impacts would occur in the nonsuitable portion of the WSA on approximately 200 acres. The remaining 13,169 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 22,225-acre suitable portion of the Goshute Canyon WSA would be withdrawn from all forms of mineral entry. This would include 5,209 acres previously withdrawn due to special area designation. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. This includes approximately 10,300 acres of moderate potential for metallic minerals. The remainder of the WSA is identified as having low potential for metallic minerals. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims.

All lands within the 13,369-acre nonsuitable portion of the WSA would remain open to mineral entry. All potential mineral resources would be available for exploration and development. This includes 5,731 acres of high potential and 8,433 acres of moderate potential for metallic minerals. Actual development of mineral resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.



CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

#### Impacts on the Exploration and Development of Energy Resources

All lands within the 22,225-acre suitable portion of the Goshute Canyon WSA would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. With the exception of 800 acres of moderate potential for geothermal resources, the remainder of the suitable portion of the WSA has been rated as having low potential for energy resources (oil, gas, geothermal).

All lands within the 13,369-acre nonsuitable portion of the WSA would remain open to mineral leasing. This includes 700 acres of moderate potential for geothermal resources. All energy resources would be available for exploration and development. Actual development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA and development of these resources is not expected to take place. There would be no impacts on the exploration or development of energy resources within the nonsuitable portion of the WSA.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the suitable and nonsuitable portions of the Goshute Canyon WSA would not change. The proposed spring developments and riparian fencing would be allowed following criteria in the Wilderness Management Policy. A 5-acre herbicide spraying of wyethia within the suitable portion would not be approved. An alternative method of removing the plants would be required.

CONCLUSIONS: There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the suitable portion of the WSA as a result of tighter wilderness restrictions. There would be no impacts to grazing facility construction within the nonsuitable portion.

Impacts on Woodland Products Harvest

The 22,225-acre suitable portion of the Goshute Canyon WSA would not be available for commercial or private harvest of woodland products. The harvest of 60 fir Christmas trees every 6 years in the Goshute Basin would be foregone. This would be a minor impact since there are enough areas outside of the suitable portion of the WSA to supply woodland products for the foreseeable future.

The remaining 13,369-acre nonsuitable portion would be available for woodland product harvest. This would include a 130-acre commercial Christmas tree and fuelwood sale. A total of 780 cords of fuelwood would be removed and 390 Christmas trees would be harvested every 6 years .

CONCLUSIONS: The harvest of 60 fir Christmas trees every 6 years within the suitable portion of the WSA would be foregone. This would be a very minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.

Impacts on Recreational Off-Road Vehicle Use

Under this alternative, 22,225 acres of the Goshute Canyon WSA would be closed to all forms of recreational ORV use. The boundary roads and 7 miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 211 visitor days annually would be foregone in the suitable portion of the WSA. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Recreational ORV use foregone in the suitable portion of the WSA would be absorbed on the nonsuitable portion and on surrounding public lands.

The remaining 13,369-acre, nonsuitable portion of the WSA would continue to remain open for recreational ORV use as designated in the Egan RMP.

CONCLUSIONS: Recreational ORV use of 211 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

Impacts on Bonneville Cutthroat Trout

Implementation of the Goshute Canyon Habitat Management Plan and the associated construction of stream stabilization projects to protect the habitat of the Bonneville cutthroat trout along Goshute Creek would be slightly constrained by the wilderness criteria of the Wilderness Management Policy. Some types of habitat enhancement would not be allowed. An example of this would be creating pools and slowing water in the creek by blasting boulders from the cliff faces above the creek so they would drop into the water. Regardless of the constraints, the actual trout population is not expected to be affected.

CONCLUSIONS: There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

ADVERSE IMPACTS WHICH CANNOT BE AVOIDED

On the 22,225 acres designated as wilderness, the unavoidable adverse impacts would be the withdrawal of the suitable portion to all forms of mineral entry.

On the 13,369 acres designated as nonwilderness, the unavoidable adverse impacts would be those associated with the loss of wilderness values from mineral exploration and development. Some of these impacts may be reduced by careful examination and mitigating stipulations in approved notices of intent and plans of operations.

RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

On the 22,225 acres designated as wilderness, the wilderness values would be protected, except in areas of valid mineral discoveries.

On the 13,369 acres designated as nonwilderness, all present uses would continue. Mineral and energy exploration and development, woodland product harvest, and off-road vehicle use would reduce wilderness values in the long-term.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

On the 22,225 acres designated as wilderness, irreversible or irretrievable commitments of wilderness values is not expected, except in areas of valid mineral discoveries.

On the 13,369 acres designated as nonwilderness, mineral and energy exploration and development would create an irreversible commitment of wilderness resources.

## ALL WILDERNESS ALTERNATIVE

Impacts on Wilderness Values

The entire 35,594-acre Goshute Canyon WSA would receive special legislative protection provided by wilderness designation.

Naturalness: Surface disturbance and construction activities associated with mineral exploration and reactivation of four small underground mines in the southern portion of the WSA would physically disturb and impair the natural character of 24 acres. Due to the already disturbed nature of the land just outside of the WSA boundary in the same area as these mines, the overall perception of naturalness would not be greatly affected. Mitigating measures in the plans of operation would minimize impacts to the wilderness resource and would require reclamation efforts to restore the area to a natural appearance.

Naturalness would be slightly impaired in the vicinity of five proposed spring developments. Minor surface disturbance resulting during development of the five spring areas would have a negligible short-term effect on naturalness in their immediate vicinity due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside of the fenced area. The presence of fences and troughs would detract slightly from the natural character in their immediate vicinity. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.

There would be a slight, positive effect on naturalness due primarily to the closure of the area to vehicles which would halt the formation of new two-wheel tracks associated with repeated off-road use. Also benefiting naturalness would be the closure of the area to additional mineral and energy exploration and development and woodland product harvest.

Solitude: The occasional blasting, use of heavy equipment, and traffic to and from the four mining sites would affect the feeling of solitude along the WSA's southern and southwestern boundaries, especially in close proximity to the mines. The duration of each mine is expected to be about 5 years. Thereafter, solitude would be restored.

Solitude would be slightly impaired in the immediate vicinity of the range developments for the duration of actual construction activities. Occasional maintenance of the spring developments accessed by vehicle would have a negligible short-term effect on solitude.

Occasional off-road vehicle use would detract from the feeling of solitude for those visitors close to the boundary roads and 13 miles of cherrystemmed routes, especially in October during hunting season. The low use of recreational vehicles (less than 15 visitor use days) during the remainder of the year lessens the impact however.

The elimination of additional mineral and energy exploration and development, as well as woodland product harvest and ORV use would have a positive effect on solitude.

Primitive and Unconfined Recreation: The operation of the above described mining operations would affect opportunities for primitive and unconfined recreation while they are in existence and the visitor is nearby. The occasional presence of vehicles would affect these opportunities as described above under solitude.

The elimination of additional mining development and energy exploration as well as woodland product harvest and ORV use would have a positive effect on enhancing the area's opportunities for primitive and unconfined recreation.

Special Features: The area's special features would remain protected under this alternative. They would receive the added protection from tighter restrictions on surface disturbing activities within wilderness.

CONCLUSIONS: The result of designation of the 35,594-acre Goshute Canyon WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; the special geologic features, highly scenic values, stands of bristlecone pine, and the Bonneville cutthroat trout habitat.

#### Impacts on the Exploration and Development of Mineral Resources

The entire 35,594-acre Goshute Canyon WSA would be withdrawn from all forms of mineral entry. This would include 5,209 acres previously withdrawn due to special area designations. Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. This includes approximately 5,731 acres of high potential and 18,733 acres of moderate potential for metallic minerals located in the southern part of the WSA. Exploration and development of mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. The 92 acres of surface disturbance associated with mineral exploration and development expected to occur without wilderness designation would be reduced to 24 acres as a result of tighter wilderness restrictions. Surface disturbance associated with exploration and development activities would include the reactivation of four small underground mines along the southern boundary of the WSA. The heap-leach operation would be foregone due to the lack of valid and existing mining claims.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 92 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 24 acres within the suitable portion if designation occurs. A small heap-leach operation would not occur due to lack of valid and existing claims.

Impacts on the Exploration and Development of Energy Resources

The entire 35,594-acre Goshute Canyon WSA would be withdrawn from all forms of mineral leasing. Development of energy resources would be foregone on all unleased lands within the WSA. This includes 1,500 acres with moderate potential for geothermal resources. The remainder of the WSA is identified as having low potential for energy resources (oil, gas, geothermal).

The 6 acres of surface disturbance (3 miles of seismic line) associated with energy exploration expected to occur without wilderness designation would be eliminated as would the 10 miles of surface shot geophysical exploration as a result of tighter wilderness restrictions. Regardless of wilderness designation, development of energy resources is not foreseen.

CONCLUSIONS: All lands within the WSA would be withdrawn from mineral leasing. Geophysical exploration totalling 13 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and exploration and development is not expected to take place.

Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the Goshute Canyon WSA would not change. The proposed spring developments and riparian fencing would be allowed, following criteria in the Wilderness Management Policy. A 5-acre herbicide spraying of wyethia within the suitable portion would not be approved. An alternative method of removing the plants would be required.

CONCLUSIONS: There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the WSA as a result of tighter wilderness restrictions.

Impacts on Woodland Products Harvest

The entire 35,594-acre Goshute Canyon WSA would not be available for commercial or private woodland products. The harvest of 780 cords of fuelwood would be foregone as would the harvest of 450 Christmas trees 6 years. This would be a minor impact since there are enough areas outside of the WSA to supply woodland products for the foreseeable future.

CONCLUSIONS: The harvest of 450 Christmas trees every 6 years and 780 cords of fuelwood would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand.



Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 35,594-acre Goshute Canyon WSA to all forms of recreational ORV use. The boundary roads and the 13 miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 320 visitor days annually would be foregone. Hunters using vehicles off existing roads would be the main recreational group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use foregone in the WSA would be absorbed on surrounding public lands.

CONCLUSIONS: Recreational ORV use of 320 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.

Impacts on Bonneville Cutthroat Trout

Implementation of the Goshute Creek Habitat Management Plan and the associated construction of stream stabilization projects to protect the habitat of the Bonneville cutthroat trout along Goshute Creek would be slightly constrained by the wilderness criteria of the Wilderness Management Policy. Some types of habitat enhancement would not be allowed. An example of this would be creating pools and slowing water in the creek by blasting boulders from the cliff faces above the creek so they would drop into the water. Regardless of the constraints, the actual trout population is not expected to be affected.

CONCLUSIONS: There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

PARTIAL WILDERNESS ALTERNATIVE NO. 2

Impacts on Wilderness Values

Under this alternative, 26,436 acres of the Goshute Canyon WSA would receive special legislative protection provided by wilderness designation. The remaining 9,158 acres would receive no special protection.

Naturalness (Suitable Portion): Naturalness within the suitable portion of the Goshute Canyon WSA would be slightly impaired in the vicinity of five proposed spring developments. Minor surface disturbance resulting during development of the five spring areas would have a slight short-term effect on naturalness in their immediate vicinity due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside of the fenced area. The presence of fences and troughs would detract slightly from the natural character in their immediate vicinity. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.



There would be a slight, positive effect on naturalness due primarily to the closure of the 26,436 acres to vehicles which would halt the formation of new two-wheel tracks associated with repeated off-road use. Also benefiting naturalness in the suitable portion would be the closure of the area to mineral and energy exploration and development and woodland product harvest.

Naturalness (Nonsuitable Portion): Surface disturbance and construction activities associated with mineral exploration and reactivation of four small underground mines in the southern portion of the WSA would physically disturb and impair the natural character of 63 acres. Due to the already disturbed nature of the land just outside of the WSA boundary in the same area as these mines, the overall perception of naturalness would not be greatly affected.

Naturalness would also be impaired on 4 acres (2 miles) by seismic lines. The wilderness user would see these lines only if they were crossed while hiking or were seen from the high country.

Stumps left by commercial woodcutting, piled branches, and associated two-wheel tracks would detract from the area's naturalness within the 60-acre cutting area on the southwest boundary of the WSA. Due to the thick tree cover, the overall perception of naturalness would not be greatly affected by the presence of the cutting area.

Solitude (Suitable Portion): Solitude would be slightly impaired in the immediate vicinity of the range developments for the duration of actual construction activities. Occasional maintenance of the spring developments accessed by vehicle would have a negligible short-term effect on solitude.

Occasional vehicular use of the 3.5 miles of cherrystemmed routes would detract from the feeling of solitude in their immediate vicinity, especially during hunting season. The low use of recreational vehicles during the remainder of the year lessens the impact.

The elimination of additional mineral and energy exploration and development, as well as woodland product harvest and ORV use would have a positive effect on solitude.

Solitude (Nonsuitable Portion): The occasional blasting, use of heavy equipment, and traffic to and from the four mining sites would detract from the feeling of solitude along the WSA's southern boundary, especially in close proximity to the mines. The duration of each mine is expected to be about 5 years. Solitude would also be impaired from the blasting and helicopters associated with the 5 miles of surface shot seismic line and from the heavy equipment used for the 1 mile of vibroseis lines.

Chain saws and vehicle use would affect solitude in the 60-acre area designated for woodcutting. These impacts would be sporadic based on the cordage, or number of Christmas trees the contractor was permitted to take.

Occasional off-road vehicle use would detract from the feeling of solitude in the nonsuitable portion of the WSA.

Primitive and Unconfined Recreation (Suitable Portion): The impacts described in the solitude section for the suitable area would also diminish the opportunities for primitive and unconfined recreation while they are in progress and the visitor is nearby.

The elimination of additional mineral development and energy exploration, as well as woodland product harvest and ORV use would have a positive effect on enhancing the area's opportunities for primitive and unconfined recreation.

Primitive and Unconfined Recreation (Nonsuitable Portion): The presence of ongoing mining operations, woodland product harvest, and ORV use would diminish the opportunity for primitive or unconfined recreation for those visitors in the vicinity of these operations.

Special Features: The area's special features -- the bristlecone pine, archaeological values, Goshute Cave, and Bonneville cutthroat trout -- are mostly located within the suitable portion of the WSA and would receive the added protection from tighter restrictions on surface disturbing activities within wilderness. The bristlecone pine located in the nonsuitable portion are still protected by laws and policies.

CONCLUSIONS: The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, special geologic features, stands of bristlecone pine, and Bonneville cutthroat trout habitat. Long-term negative impacts would occur in the nonsuitable portion of the WSA on approximately 130 acres. The remaining 9,028 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 26,436-acre suitable portion of the Goshute Canyon WSA would be withdrawn from all forms of mineral entry. This includes about 2,000 acres already withdrawn because of special area designation. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. This includes approximately 15,230 acres of moderate potential for metallic minerals. The remainder of the WSA is identified as having low potential for metallic minerals. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims.

All lands within the 9,158-acre nonsuitable portion of the WSA would remain open to mineral entry. All mineral resources would be available for exploration and development. This includes 5,731 acres of high potential and 3,503 acres of moderate potential for metallic minerals. Actual development of mineral resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The small heap-leach operation anticipated without wilderness designation would be foregone due to the lack of valid and existing claims.

All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

#### Impacts on the Exploration and Development of Energy Resources

All lands within the 26,436-acre suitable portion of the Goshute Canyon WSA would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. The suitable portion of the WSA has been rated as having low potential for energy resources (oil, gas, and geothermal).

All lands within the 9,158-acre nonsuitable portion of the WSA would remain open to mineral leasing. This includes 1,500 acres with moderate potential for geothermal resources. All energy resources would be available for exploration and development. Actual development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the suitable and nonsuitable portions of the Goshute Canyon WSA would not change. The proposed spring developments and riparian fencing would be allowed, following criteria in the Wilderness Management Policy. A 5-acre herbicide spraying of wyethia within the suitable portion would not be approved. An alternative method of removing the plants would be required.

CONCLUSIONS: There would be no impacts to grazing facility maintenance. There would be negligible impacts on the development of new projects within the suitable portion of the WSA as a result of tighter wilderness restrictions. There would be no impacts to grazing facility construction within the nonsuitable portion.

## GOSHUTE CANYON

### Impacts on Woodland Products Harvest

The 26,436-acre suitable portion of the Goshute Canyon WSA would not be available for commercial or private harvest of woodland products. The harvest of 270 Christmas trees every 6 years and 420 cords of fuelwood would be foregone. This would be a minor impact since there are enough areas outside of the suitable portion of the WSA to supply woodland products for the foreseeable future.

The remaining 9,158-acre nonsuitable portion would be available for woodland product harvest. This would include a 60-acre cutting area for commercial Christmas tree and fuelwood sales. Approximately 180 Christmas trees every 6 years and 360 cords of fuelwood would be harvested.

**CONCLUSIONS:** The harvest of 270 Christmas trees every 6 years and 420 cords of fuelwood and commercial sales of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the nonsuitable portion of the WSA.

### Impacts on Recreational Off-Road Vehicle Use

Under this alternative, 26,436 acres of the Goshute Canyon WSA would be closed to all forms of recreational ORV use. The boundary roads and 3.5 miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 240 visitor days annually would be foregone in the suitable portion of the WSA. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Recreational ORV use foregone in the suitable portion of the WSA would be absorbed on the nonsuitable portion and on surrounding public lands.

The remaining 9,158-acre, nonsuitable portion of the WSA would continue to remain open for recreational ORV use as designated in the Egan RMP.

**CONCLUSIONS:** Recreational ORV use of 240 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

### Impacts on Bonneville Cutthroat Trout

Implementation of the Goshute Canyon Habitat Management Plan and the associated construction of stream stabilization projects to protect the habitat of the Bonneville cutthroat trout along Goshute Creek would be slightly constrained by the wilderness criteria of the Wilderness Management Policy. Some types of habitat enhancement would not be allowed. An example of this would be creating pools and slowing water in the creek by blasting boulders from the cliff faces above the creek so they would drop into the water. Regardless of the constraints, the actual trout population is not expected to be affected.

CONCLUSIONS: There would be no impact to the Bonneville cutthroat trout habitat. Management actions would be slightly constrained because stabilization projects and other proposed actions would have to meet the wilderness criteria set forth in the Wilderness Management Policy.

## NO WILDERNESS ALTERNATIVE

### Impacts on Wilderness Values

The entire 35,594-acre Goshute Canyon WSA would not be designated as wilderness and would receive no special legislative protection.

Naturalness: Surface disturbance and construction activities associated with mineral exploration and reactivation of four small underground mines in the southern portion of the WSA would physically disturb and impair the natural character of 63 acres. Due to the already disturbed nature of the land just outside of the WSA boundary in the same area as these mines, the overall perception of naturalness would not be greatly affected. A 34-acre heap-leach mining operation on the west side of the WSA would impair the area's naturalness in the mine's vicinity.

Naturalness would also be slightly impaired on approximately 6 acres (3 miles) as a result of geophysical exploration. Surface disturbance would be in the form of visible linear tracks lasting approximately 15 years. The wilderness user would see these lines only if they were crossed while hiking or were seen from the high country.

Minor surface disturbance resulting from development of the five spring areas would have a slight short-term effect on naturalness in the immediate vicinity of the spring developments due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside of the fenced area. The presence of fences and troughs would detract slightly from the natural character in the immediate vicinity. This would be offset, however, by the reestablishment of vegetation within three years and the presence of ungrazed riparian areas.

Stumps left by commercial woodcutting, piled branches, and associated two-wheel tracks would detract from the area's naturalness within the 130-acre cutting area on the southwest boundary of the WSA, as well as from the 30-acre area in Goshute Basin for fir Christmas trees. Due to the thick tree cover the overall perception of naturalness would not be greatly affected by the presence of the cutting areas. The fir stumps would be partially hidden from sight by the surrounding aspen groves.

Solitude: The occasional blasting, use of heavy equipment, and traffic to and from the five mining sites would affect the feeling of solitude along the WSA's southern and southwestern boundaries, especially in close proximity to the mines. The duration of each mine is expected to be about 5 years. Solitude would also be impaired from the blasting and helicopters associated with the 10 miles of surface shot seismic line and from the heavy equipment used for the 3 miles of vibroseis lines. The nature of these impacts would last only for a short time while the lines are run.



## GOSHUTE CANYON

Chain saws and vehicle use will affect solitude in the 130-acre area designated for woodcutting. These impacts would be sporadic based on the cordage, or number of Christmas trees the contractor was permitted to take.

Occasional off-road vehicle use would detract from the feeling of solitude for those visitors close to the boundary roads and 13 miles of cherrystemmed routes, especially in October during hunting season. The low use of recreational vehicles (less than 15 visitor use days) during the remainder of the year lessens the impact however. Should the White Pine Power Project be constructed nearby, recreational ORV use would increase substantially especially during the construction phase where workers would be housed on site. Solitude would also be occasionally affected by visitors using the primitive campground just outside of the WSA.

Primitive and Unconfined Recreation: The presence of ongoing mining operations and recreational ORV use would diminish the opportunity for primitive or unconfined recreation for those visitors close to the mining operations or along the boundary roads and 13 miles of cherrystemmed routes.

Special Features: The area's special features would not be affected under this alternative. The bristlecone pine, archaeological values, Goshute Cave, and Bonneville cutthroat trout are all protected under various laws and policies.

CONCLUSIONS: Long-term physical impairment to the wilderness qualities of the Goshute Canyon WSA would occur on approximately 260 acres in the southern and western portions of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values within the WSA would not be impaired. The geologic features, bristlecone pine stands and Bonneville cutthroat trout habitat would not be affected by a no wilderness designation. The remaining 35,334 acres would retain their wilderness values.

### Impacts on the Exploration and Development of Mineral Resources

All lands within the Goshute Canyon WSA would remain open to mineral entry. All mineral resources would be available for exploration and development. This includes 5,731 acres of high potential and 17,833 acres of moderate potential for metallic minerals in the southern part of the WSA.

Because all minerals would remain available for development, there would be no impact on the exploration and development of mineral resources.

CONCLUSIONS: All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources.

Impacts on the Exploration and Development of Energy Resources

All lands within the 35,594-acre Goshute Canyon WSA would remain open to all forms of mineral leasing. Energy resource potential for the entire WSA is considered to be low with the exception of 1,500 acres with moderate potential for geothermal potential. Exploration or development of these resources (oil, gas, geothermal) is not expected. Because the WSA would remain available for mineral leasing, there would be no impact to the development of energy resources. Energy development is not expected to occur within the WSA.

CONCLUSIONS: All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the Goshute Canyon WSA would not change. All proposed range projects would be allowed without the constraints of the Wilderness Management Policy.

CONCLUSIONS: There would be no impacts on grazing facility maintenance and construction.

Impacts on Woodland Products Harvest

The entire 35,594-acre Goshute Canyon WSA would be available for commercial and private woodland products harvest. The harvest of 780 cords of fuelwood would take place as would the harvest of 450 Christmas trees every 6 years.

CONCLUSIONS: There would be no impacts on woodland products harvest.

Impacts on Recreational Off-Road Vehicle Use

The entire 35,594-acre Goshute Canyon WSA would remain open to ORV use as designated in the Egan RMP. Recreational ORV use would remain below 400 visitor days annually for the foreseeable future.

CONCLUSIONS: There would be no impacts on recreational ORV use.

Impacts on Bonneville Cutthroat Trout

Implementation of the Goshute Canyon Habitat Management Plan and the associated construction of stream stabilization projects to protect the habitat of the Bonneville cutthroat trout habitat along Goshute Creek would not be encumbered by the requirements of the Wilderness Management Policy.

CONCLUSIONS: There would be no impact to the Bonneville cutthroat trout habitat. Management would be slightly easier because stabilization projects would not have to meet the wilderness criteria in the Wilderness Management Policy.



## PARK RANGE WSA

NV-040-154

### PROPOSED ACTION (All Wilderness Alternative)

#### Impacts on Wilderness Values

The entire 47,268-acre Park Range WSA would receive special legislative protection provided by wilderness designation.

Naturalness: Surface disturbance and construction activities associated with exploration in the northern tip of the WSA would physically disturb and impair the natural character of 1 acre. The disturbance would be in the form of minimal access and drill pad construction.

Naturalness would be benefited from the closure of the area to mineral energy exploration and possible development and recreational ORV use.

Solitude: The occasional use of heavy equipment for mineral exploration would impair a visitor's solitude only slightly for the duration of the activities. Vehicular use for maintenance of existing range developments would be sporadic and would have negligible effects on opportunities for solitude. Absence of mineral and energy exploration would have a positive effect on solitude within the WSA.

Primitive and Unconfined Recreation: Opportunities for primitive recreation would be preserved.

Special Features: The area's special features such as pristine meadows, archaeological values and wild horses would be preserved and would receive protection from tighter restrictions on surface disturbing activities within wilderness.

CONCLUSIONS: The result of designation of the Park Range WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; the pristine mountain meadows, highly scenic values, and the archaeological values.

#### Impacts on the Exploration and Development of Mineral Resources

The entire 47,268-acre Park Range WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The entire WSA has been rated as having low potential for metallic minerals. Exploration for mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. The 2 acres of surface disturbance associated with mineral exploration expected to occur without wilderness designation would be reduced to 1 acre as a result of tighter wilderness restrictions. Surface disturbance associated with exploration activities would include minimal access and drill pad construction. No mineral development is expected.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 2 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 1 acre within the suitable portion if designation occurs. Favorability for development of mineral resources is low within the WSA and development of mineral resources is not expected.

#### Impacts on the Exploration and Development of Energy Resources

The entire 47,268-acre Park Range WSA would be withdrawn from all forms of mineral leasing. Development of energy resources would be foregone on all unleased lands within the WSA. The benches of the WSA have been identified as having 22,230 acres of moderate potential for geothermal resources. The remainder of the WSA has low potential for energy resources (oil, gas, and geothermal). Geothermal development could more easily occur just outside the WSA where the same or better level of potential exists. The area's remoteness and lack of infrastructure make exploration or development of geothermal resources unlikely.

The 3 acres of surface disturbance (1.5 miles of seismic line) associated with energy exploration expected to occur without wilderness designation would be eliminated as a result of tighter wilderness restrictions. Regardless of wilderness designation, development of energy resources is not expected to take place.

CONCLUSIONS: All lands within the WSA would be withdrawn from mineral leasing. Geophysical exploration totalling 1.5 miles would be foregone due to tighter wilderness restrictions. Favorability for exploration or development of energy resources is low within the WSA and development is not expected to take place.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the Park Range WSA would remain the same with the exception that maintenance of Tank Spring would be accomplished without the use of vehicles.

A livestock well proposed on the west side of the WSA would be located slightly to the west, outside of the WSA. This would cause little if any inconvenience to the operator.

CONCLUSIONS: There would be negligible impacts to grazing facility maintenance and construction.

#### ADVERSE IMPACTS WHICH CANNOT BE AVOIDED

On the 47,268 acres designated as wilderness, the unavoidable adverse impacts would be the withdrawal of the WSA to all forms of mineral entry and mineral leasing.

## PARK RANGE

### RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

On the 47,268 acres designated as wilderness, the wilderness values would be protected except in areas of valid mineral discoveries.

### IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

On the 47,268 acres designated as wilderness, irreversible and irretrievable commitments of wilderness resources is not expected except in areas of valid mineral discoveries.

## PARTIAL WILDERNESS ALTERNATIVE NO. 1

### Impacts on Wilderness Values

Under this alternative, 38,573 acres of the Park Range WSA would receive legislative protection provided by wilderness designation. The remaining 8,695 acres would receive no special protection.

Naturalness (Suitable Portion): The natural character of the WSA would be preserved. There are no adverse impacts anticipated within the suitable portion of the WSA.

Naturalness (Nonsuitable Portion): Surface disturbance and construction activities associated with mineral exploration in the northern tip of the WSA would physically disturb and impair the natural character of 5 acres. Construction of drill pads and access would result in localized areas of scarified topography which would last many years. Due to the open nature of the northern tip of the WSA, these disturbances would be visible from the western boundary road. The perception of naturalness would be impaired on approximately 300 acres.

In addition, 1.5 miles of seismic line would disturb 3 acres resulting in the formation of visible linear tracks.

Solitude (Suitable Portion): Vehicular access for maintenance of range developments would be sporadic and would have only negligible effects on opportunities for solitude.

Solitude (Nonsuitable Portion): The occasional use of heavy equipment for mineral and energy exploration would impair a visitor's solitude only slightly for the short duration of the activities.

Primitive and Unconfined Recreation (Suitable Portion): Opportunities for primitive recreation would be preserved in the suitable portion of the WSA. No adverse impacts are anticipated.

Primitive and Unconfined Recreation (Nonsuitable Portion): Opportunities for primitive recreation would be unaffected.

Special Features: Most of the area's special features such as the highly scenic values, pristine mountain meadows, and archaeological values are located within the suitable portion of the WSA and would receive the added protection from the tighter restrictions placed on surface disturbing activities within wilderness.

CONCLUSIONS: The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; highly scenic values, pristine mountain meadows, and archaeological values. Long-term negative impacts to the perception of wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 300 acres. The remaining 8,395 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 38,573-acre suitable portion of the Park Range WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The entire WSA has been rated as having low potential for mineral resources. Exploration for mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. There would be no surface disturbance associated with exploration or development activities within the suitable portion of the WSA.

All lands within the 8,695-acre nonsuitable portion of the WSA would remain open to mineral entry. All mineral resources would be available for exploration and development. The entire WSA has low potential for metallic minerals. Exploration would take place on 2 acres in the northern portion of the WSA including access and drill pad construction. Actual development of mineral resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Exploration and development of mineral resources would be forgone on all unclaimed lands within the suitable portion of the WSA. Neither exploration nor development of mineral resources is anticipated within the suitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

Impacts on the Exploration and Development of Energy Resources

All lands within the 38,573-acre suitable portion of the Park Range WSA would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. This includes 16,790 acres identified as having moderate geothermal potential. Geothermal development could more easily occur just outside the WSA where the same or better level of potential exists. The area's remoteness and lack of infrastructure make exploration or development of geothermal resources unlikely.

All lands within the 8,695-acre nonsuitable portion of the WSA would remain open to mineral leasing, including 5,440 acres of moderate geothermal potential. All energy resources would be available for exploration and development. Actual development of energy resources (oil, gas, geothermal) is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the Park Range WSA would remain the same with the exception that maintenance of Tank Spring would be accomplished without the use of vehicles.

A livestock well proposed on the west side of the WSA would be located slightly to the west, outside of the WSA. This would cause little if any inconvenience to the operator.

CONCLUSIONS: There would be negligible impacts on grazing facility maintenance and construction.

NO WILDERNESS ALTERNATIVE

Impacts on Wilderness Values

The entire 47,268-acre Park Range WSA would not be designated as wilderness and would receive no special legislative protection.

Naturalness: Surface disturbance and construction activities associated with mineral exploration in the northern tip of the WSA would physically disturb and impair the natural character of 5 acres. The disturbance would be in the form of access and drill pad construction. Construction of drill pads and access would result in localized areas of scarified topography which would last many years. Due to the open nature of the northern tip of the WSA, these disturbances would be visible from the western boundary road. The perception of naturalness would be impaired on approximately 300 acres.

In addition, 1.5 miles of vibroseis lines would disturb 3 acres resulting in visible linear tracks. A proposed well and trough on the west side of the WSA would affect naturalness in their immediate vicinity. Approximately 1 acre would be denuded of vegetation by cattle congregation.

Solitude: The occasional use of heavy equipment for mineral exploration would impair a visitor's solitude only slightly, for the duration of the activities. Vehicular access for maintenance of existing range developments would be sporadic and would have negligible effects on opportunities for solitude.

Primitive and Unconfined Recreation: Opportunities for primitive recreation would be unaffected.

Special Features: The area's special features such as pristine meadows, archaeological values, and wild horses would be unaffected.

CONCLUSIONS: Long-term physical impairment to the perception of wilderness qualities of the Park Range WSA would occur on approximately 300 acres in the northern portion of the WSA. Opportunities for solitude and primitive and unconfined recreation would be unaffected. The highly scenic values and other special features within the WSA would not be impaired. The remaining 46,968 acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the Park Range WSA would remain open to mineral entry. All minerals would be available for exploration and development. The entire WSA was rated as having low potential for metallic minerals. Because all minerals would remain available for development, there would be no impact to the exploration and development of mineral resources.

CONCLUSIONS: All lands within the Park Range WSA would remain open to mineral entry. There would be no impacts on the development of mineral resources.



Impacts on the Exploration and Development of Energy Resources

All lands within the 47,278-acre Park Range WSA would remain open to all forms of mineral leasing. Oil and gas potential for the WSA is considered low and exploration or development of these resources is not anticipated. Approximately 22,230 acres on the east and west benches have been identified as having moderate potential for geothermal resources. Geothermal development could more easily occur just outside the WSA where the same or better level of potential exists. The area's remoteness and lack of infrastructure make exploration or development of geothermal resources unlikely. Because the WSA would remain available for mineral leasing, there would be no impact to the exploration and development of energy resources.

CONCLUSIONS: All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the Park Range WSA would not change. A proposed livestock well would be located along the west boundary of the WSA.

CONCLUSIONS: There would be no impacts on grazing facility maintenance and construction.

RIORDAN'S WELL WSA

NV-040-166

PROPOSED ACTION (Partial Wilderness Alternative No. 1)

Impacts on Wilderness Values

Under the Proposed Action, 37,532 acres of the Riordan's Well WSA would receive special legislative protection provided by wilderness designation. The remaining 19,460 acres would receive no special protection.

Naturalness (Suitable Portion): Surface disturbance associated with mineral development and exploration activities would physically disturb and impair the natural character of 9 acres within the suitable portion of the WSA. Eight acres of surface disturbance, including a 4-acre waste dump and construction of a haul road would result from the development of a small underground mine on the southern boundary of the suitable portion. The presence of a waste dump would result in a modified landform detracting from the natural character of the landscape. Due to the surrounding thick tree cover, this disturbance would be visible only in its immediate vicinity. Tailings ponds and support facilities would be located to the south within the nonsuitable portion. A small exploration program in the central portion of the WSA using helicopter-portable drills would physically disturb up to 1 acre.



Naturalness would be slightly impaired in the vicinity of a proposed spring development at Upper Perish Spring. An additional development at Lower Perish Spring would involve the construction of a .5-mile pipeline to troughs located within the nonsuitable portion of the WSA. Minor surface disturbance resulting from development of these range projects would have a short-term effect on naturalness due to vegetation disturbance. The spring area would also be fenced which would detract slightly from the feeling of naturalness in its immediate vicinity. This would be offset by the reestablishment of vegetation within 3 years and the presence of an ungrazed riparian area.

Naturalness would be benefited by the closure of the suitable area to mineral and energy exploration and possible development, and to woodland product harvest. There would also be a slight positive effect on naturalness with the closure of the suitable portion of the WSA to off-road vehicles. This action would halt the formation of new, two-wheel tracks associated with repeated off-road use.

Naturalness (Nonsuitable Portion): Surface disturbance associated with mineral development and exploration activities would physically disturb and impair the natural character of 34 acres within the nonsuitable portion of the WSA. Approximately 18 acres would be stripped of thick tree cover for the construction of beneficiation facilities and tailings ponds for a small underground mine located within the suitable portion. The tailings pond would result in a modified landform which would detract from the natural character of the landscape and would be visible from the high country near Heath Peak and along the southern boundary road.

Two exploration programs would physically disturb a total of 16 acres in the northern part of the nonsuitable portion. Surface disturbance would include access construction and drill pads.

Surface disturbance totalling 10 acres would result from two wildcat oil and gas exploration wells on the east and west benches of the nonsuitable portion. Each 3-acre well pad would be stripped of vegetation and topsoil. Access to the well pads would total 4 acres of disturbance. The well pads would be reclaimed and restored to a natural condition in about 8 years. Seismic lines from geophysical exploration would leave 6 miles (12 acres) of noticeable linear tracks on the southeastern bench lasting approximately 15 years.

A 1,500-acre pinyon-juniper chaining in the northern part of the nonsuitable portion would result in large areas of vegetation disturbance and slash piles which would greatly affect the natural character in this area.

Vegetation treatment in the form of crested wheatgrass seedings proposed for 5,100 acres in the southeastern parts of the nonsuitable portion of the WSA would be accomplished by either plowing, prescribed burning, or the limited suppression of wildfire. In any case, the seeding would likely be accomplished with the use of a rangeland drill. The resulting block of crested wheatgrass would appear somewhat unnatural in comparison to the surrounding untreated area. The seedings would be fenced and this would also detract from the naturalness of the area.

Two livestock wells and a .5-mile pipeline with troughs would be built in the nonsuitable portion. Each well would result in a 1-acre area denuded of vegetation due to livestock congregation. The pipeline construction would disturb a swath about 12 feet wide totalling less than 1 acre of surface disturbance. Naturalness would be slightly impaired in the vicinity of a proposed spring development at Seep Spring. Minor surface disturbance resulting from development would have a short-term effect on naturalness due to vegetation disturbance. The spring area would also be fenced which would detract slightly from the feeling of naturalness in its immediate vicinity. This would be offset by the reestablishment of vegetation within 3 years and the presence of an ungrazed riparian area.

Solitude (Suitable Portion): Solitude would be affected in the southern part of the suitable portion of the WSA in the vicinity of the underground mining operation and also in the vicinity of mineral exploration in the central part of the WSA.

Solitude would also be slightly affected in the immediate vicinity of the range project during development.

Occasional vehicle use would detract from the feeling of solitude for those visitors in close proximity to the area's boundary roads and 4.5 miles of cherrystemmed routes. Periodic maintenance visits to the existing range developments would also slightly detract from the feeling of solitude.

The reduction of mineral exploration and the elimination of woodland products harvest and ORV use would have a positive effect on solitude within the suitable portion of the WSA.

Solitude (Nonsuitable Portion): Mineral and energy exploration activities and mineral development of a small underground mine would affect the wilderness value of solitude. Sights and sounds from traffic and construction related to exploration and development of mineral resources would lower the quality of solitude in the nonsuitable portion of the WSA, for the duration of the activities. Solitude would also be impaired during the mechanical conversion of pinyon woodland in the northern part of the nonsuitable portion. Sounds of chain saws within the chaining area from salvage woodcutters would impair solitude sporadically. Solitude would similarly be affected in two areas of post and pole sales.

Treatment of 5,100 acres of sagebrush in the southeastern part of the nonsuitable portion would affect solitude during plowing and seeding activities.

Occasional off-road vehicle use would detract from the feeling of solitude, especially in the September-October hunting season. During years of peak pinyon nut crop, certain areas would experience an increase in nut harvesters in the autumn season.

Primitive and Unconfined Recreation (Suitable Portion): The impacts described in the naturalness and solitude sections above would also affect the opportunities for primitive and unconfined recreation, particularly in the southern portion of the area. The reduction of mineral exploration, woodland product harvest, and ORV use would have a positive effect on enhancing the opportunities for primitive recreation within the remainder of the suitable portion.

Primitive and Unconfined Recreation (Nonsuitable Portion): The presence of mineral development, mineral and energy exploration, commercial woodland products harvest, vegetation treatment on 6,600 acres, and occasional ORV use would all combine to diminish the opportunity for primitive and unconfined recreation for the visitors near these disturbances.

Special Features: The highly scenic qualities of the Riordan's Well WSA including large stands of ponderosa pine, numerous caves, and avian wildlife are located almost entirely within the suitable portion of the WSA and would receive the added protection afforded from wilderness designation.

CONCLUSIONS: The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 6,660 acres. The remaining 12,800 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 37,542-acre suitable portion of the Riordan's Well WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. This includes approximately 1,230 acres of moderate potential for metallic minerals. The remainder of the WSA is identified as having a low potential for metallic minerals. Exploration and development of mineral resources on valid claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. Surface disturbance associated with exploration and development activities would include minimal access and haul roads, drill pads and waste dumps. The underground mine anticipated within the WSA would occur even with wilderness designation. The mine would be located within the suitable portion of the WSA as would a 4-acre waste dump and 4 acres for haul roads. Tailings ponds support and beneficiation facilities would be located 1 mile south, in the nonsuitable portion of the WSA due to tighter wilderness restrictions. Waste dumps within the suitable portion would be reduced from 6 acres to 4 acres as a result of wilderness designation.

The 3 acres of surface disturbing exploration activity expected within the suitable portion of the WSA if designation does not occur would be reduced to 1 acre with designation.

All lands within the 19,460-acre nonsuitable portion of the WSA would remain open to mineral entry. All mineral resources would be available for exploration and development. This includes 1,720 acres of moderate potential for metallic minerals.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 31 acres of surface disturbing exploration and development activity expected within the suitable portion if designation does not occur would be reduced to 9 acres if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located in the nonsuitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

#### Impacts on the Exploration and Development of Energy Resources

All lands within the 37,542-acre suitable portion of the Riordan's Well WSA would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA.

All lands within the 19,460-acre nonsuitable portion of the WSA would remain open to mineral leasing. All energy resources would be available for exploration and development. The entire WSA has been rated as having low potential for energy resources (oil, gas, and geothermal). Actual development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the suitable and nonsuitable portions of the Riordan's Well WSA would not change. Within the suitable portion, the proposed spring developments (Upper Parish and Seep Springs) and the Lower Parish Spring pipeline would be constructed following criteria in the Wilderness Management Policy.

In the nonsuitable portion of the WSA, the following proposed projects would occur: 5,100 acres of a 9,100-acre proposed seeding; a 1,500-acre chaining of pinyon woodland; two livestock wells and a .5-mile pipeline in the southern portion of the WSA. The remainder of the seeding could be accomplished outside of the WSA and still achieve the goal of increasing forage in the affected allotments. A proposed allotment boundary fence would not be allowed since it is located half within the suitable portion of the WSA and half in the nonsuitable portion. As a result, minor cattle trespass would continue. Should cattle trespass become more of a problem, the allotment boundary fence would be moved slightly to the north and constructed entirely within the nonsuitable portion of the WSA.

**CONCLUSIONS:** There would be no impacts to grazing facility maintenance. There would be a minor impact to grazing facility construction within the suitable portion. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the suitable portion would be foregone by disallowing portions of two seedings. There would be no impacts to grazing facility construction within the nonsuitable portion of the WSA.

#### Impacts on Woodland Products Harvest

The 37,542-acre suitable portion of the Riordan's Well WSA would not be available for commercial or private harvest of woodland products. The harvest of 1,000 post and poles, and commercial sales of pinyon pine nuts would be foregone. This would be a minor impact since there are enough areas outside of the suitable portion of the WSA to supply woodland products for the foreseeable future.

The remaining 19,460-acre nonsuitable portion would be available for woodland product harvest. This would include the harvest of 8,100 cords of fuelwood, 1,400 post and poles, and commercial pinyon nut sales.

**CONCLUSIONS:** The harvest of 1,000 post and poles and commercial sales of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impacts on woodland product harvest within the nonsuitable portion of the WSA.

#### Impacts on Recreational Off-Road Vehicle Use

Under this alternative, 37,542 acres of the Riordan's Well WSA would be closed to all forms of recreational ORV use. The boundary roads and 4½ miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 122 visitor days annually would be foregone in the suitable portion of the WSA. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Recreational ORV use foregone in the suitable portion of the WSA would be absorbed on the nonsuitable portion and on surrounding public lands.



## RIORDAN'S WELL

The remaining 19,460-acre nonsuitable portion of the WSA would continue to remain open for recreational ORV use as designated in the Egan RMP.

**CONCLUSIONS:** Recreational ORV use of 122 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

### ADVERSE IMPACTS WHICH CANNOT BE AVOIDED

On the 37,542 acres designated as wilderness, the unavoidable adverse impacts would be the withdrawal of the suitable portion to all forms of mineral entry.

On the 19,469 acres designated as nonwilderness, the unavoidable adverse impacts would be those associated with the loss of wilderness values from mineral and energy exploration and development. Some of these impacts may be reduced by careful examination and mitigating stipulations in approved notices of intent and plans of operations.

### RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

On the 37,542 acres designated as wilderness, the wilderness values would be protected except in areas of valid mineral discoveries.

On the 19,460 acres designated as nonwilderness, all present uses would continue. Mineral and energy exploration and development, woodland product harvest, vegetation conversions, and off-road vehicle use would reduce wilderness values in the long-term.

### IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

On the 37,542 acres designated as wilderness, irreversible or irretrievable commitments of wilderness values is not expected except in areas of valid mineral discoveries.

On the 19,460 acres designated as nonwilderness, mineral and energy exploration and development would create an irreversible commitment of wilderness resources.

## ALL WILDERNESS ALTERNATIVE

### Impacts on Wilderness Values

The entire 57,002-acre Riordan's Well WSA would receive special legislative protection provided by wilderness designation.

Naturalness: Surface disturbance associated with mineral development and exploration activities would physically disturb and impair the natural character of 15 acres within the WSA. Eight acres of surface disturbance, including a 4-acre waste dump and construction of a haul road would result from the development of a small underground mine on the southern boundary of the WSA. The presence of a waste dump would result in a modified landform, detracting from the natural character of the landscape. Due to the surrounding thick tree cover, this disturbance would be visible only in its immediate vicinity. Tailings ponds and support facilities would be located to the south outside of the WSA boundary. A small exploration program in the central portion of the WSA, using helicopter-portable drills would physically disturb up to 1 acre. Additionally, two exploration programs in the northern part of the WSA would disturb 2 and 4 acres respectively through minimal access and drill pad construction.

Surface disturbance totalling 10 acres would result in two wildcat oil and gas exploration wells on the east and west benches of the WSA. Each 3-acre drill pad would be stripped of vegetation and topsoil. Access to the well pads would total 4 acres of disturbance. The well pads and access routes would have more intensive reclamation and should be restored to a natural appearing condition in 5 years. Depending on the slope of the drill site, the well pads may result in a slightly modified landform which would essentially blend with the natural landscape after revegetation.

Naturalness would be slightly impaired in the vicinity of two proposed spring developments at Upper Perish and Seep Springs. The spring areas would be fenced which would detract slightly from the feeling of naturalness in their immediate vicinity. This would be offset by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.

Naturalness would be benefited by the closure of the WSA to mineral and energy exploration and possible development, and to woodland product harvest. There would also be a slight positive effect on naturalness with the closure of the WSA to off-road vehicles. This action would halt the formation of new two-wheel tracks associated with repeated off-road use.

Solitude: Solitude would be affected in the southern part of the WSA in the vicinity of the underground mining operation and also in the vicinity of mineral exploration activities in the central and northern part of the WSA. Solitude would also be slightly affected while development of the Upper Perish Spring occurs.

Occasional vehicle use would detract from the feeling of solitude for those visitors in close proximity to the area's boundary roads and 8.5 miles of cherrystemmed routes. Periodic maintenance visits to the existing range developments would also affect the feeling of solitude.

The reduction of mineral exploration and the elimination of woodland products harvest and ORV use would have a positive effect on solitude.



Primitive and Unconfined Recreation: The impacts described in the naturalness and solitude sections above would also affect the opportunities for primitive and unconfined recreation, particularly in the central and northern portions of the area. The reduction of mineral exploration, woodland product harvest, and ORV use would have a positive effect on enhancing the opportunities for primitive recreation within the WSA.

Special Features: The highly scenic qualities of the Riordan's Well WSA including large stands of ponderosa pine, numerous caves, and avian wildlife would receive the added protection afforded from wilderness designation.

CONCLUSIONS: The result of designation of the Riordan's Well WSA as wilderness would be to preserve the naturalness and excellent opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Even with wilderness designation, long-term negative impacts to the wilderness qualities would occur on approximately 15 acres.

#### Impacts on the Exploration and Development of Mineral Resources

The entire 57,002-acre Riordan's Well WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. This includes approximately 2,950 acres of moderate potential for metallic minerals located in the western part of the WSA. Exploration and development of mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. The underground mine anticipated within the WSA would occur even with wilderness designation. The mine would be located within the WSA as would a 4-acre waste dump and 4 acres for haul roads. Tailings ponds, support and beneficiation facilities would be located approximately 1.5 miles south, outside of the WSA due to tighter wilderness restrictions. Waste dumps within the WSA would be reduced from 6 acres to 4 acres as a result of wilderness designation.

The 19 acres of surface disturbing exploration activity expected within the WSA if designation does not occur would be reduced to 7 acres with designation. Surface disturbance associated with exploration and development activities would include waste dumps, haul road, minimal access, and drill pad construction.

CONCLUSIONS: Exploration and development of potential mineral resources would be foregone on all unclaimed lands within the WSA. The 47 acres of surface disturbing exploration and development activity expected if designation does not occur would be reduced to 15 acres within the WSA if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located outside of the WSA.

Impacts on the Exploration and Development of Energy Resources

The entire 57,002-acre Riordan's Well WSA would be withdrawn from all forms of mineral leasing. Development of energy resources would be foregone on all unleased lands within the WSA. The entire WSA is identified as having low potential for energy resources (oil, gas, and geothermal).

Two wildcat oil wells, totalling 10 acres of surface disturbance would be drilled on existing leases, even with wilderness designation.

The 12 acres of surface disturbance (6 miles of seismic line) associated with energy exploration expected to occur without wilderness designation would be eliminated as a result of tighter wilderness restrictions. Regardless of wilderness designation, development of energy resources is not expected.

CONCLUSIONS: All lands within the WSA would be withdrawn from mineral leasing. Two wildcat oil wells would be drilled on existing leases. Geophysical exploration totalling 6 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and development is not expected.

Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the Riordan's Well WSA would not change. Upper Perish Spring and Seep Spring would be developed following criteria in the Wilderness Management Policy.

A number of the proposed range projects within Riordan's Well WSA would not be allowed. These include two livestock wells, two sections of pipelines totalling 3 miles, 3.5 miles of an allotment boundary fence, a 1,500-acre chaining, and two fenced seedings totalling 9,700 acres.

Disallowing the water projects would not affect current grazing, however, better cattle distribution would not be achieved. Additional forage for cattle would not be created within the WSA due to the fenced seedings and chaining being prohibited. The seedings and chaining could be accomplished outside of the WSA and still achieve the goal of increasing forage in the affected allotments. Minor cattle trespass would still continue as a result of not having the allotment boundary fence constructed.

CONCLUSIONS: There would be no impact to grazing facility maintenance. There would be a negative impact to grazing facility construction. The absence of some additional water developments would not affect current grazing, however, better cattle distribution would not be achieved. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the WSA would be foregone by disallowing two seedings and one chaining.

### Impacts on Woodland Products Harvest

The entire 57,002-acre Riordan's Well WSA would not be available for commercial or private harvest of woodland products. The harvest of 8,100 cords of fuelwood; 1,400 posts and poles; and commercial sales of pinyon pine nuts would be foregone. This would be a minor impact since there are enough areas outside of the WSA to supply woodland products for the foreseeable future.

**CONCLUSIONS:** The harvest of 8,100 cords of fuelwood, 1,400 posts and poles and commercial sales of pine nuts within the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand. There would be no impacts on woodland products harvest within the unsuitable portion of the WSA.

### Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 57,002-acre Riordan's Well WSA to all forms of recreational ORV use. The boundary roads and 8½ miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 185 visitor days annually would be foregone. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use foregone in the WSA would be absorbed on surrounding public lands.

**CONCLUSIONS:** Recreational ORV use of 185 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.

## PARTIAL WILDERNESS ALTERNATIVE NO. 2

### Impacts on Wilderness Values

Under this alternative, 45,791 acres of the Riordan's Well WSA and an additional 2,409 acres of non-WSA lands would receive special legislative protection provided by wilderness designation. The remaining 11,211 acres would receive no special protection.

**Naturalness (Suitable Portion):** Surface disturbance associated with mineral development and exploration activities would physically disturb and impair the natural character of 15 acres within the suitable portion of the WSA. Eight acres of surface disturbance, including a 4-acre waste dump and construction of a haul road would result from the development of a small underground mine on the southern boundary of the suitable portion. The presence of a waste dump would result in a modified landform, detracting from the natural character of the landscape. Due to the surrounding thick tree cover, this disturbance would be visible only in its immediate

vicinity. Tailings ponds and support facilities would be located to the south within the nonsuitable portion. A small exploration program in the central portion of the WSA, using helicopter-portable drills would physically disturb up to 1 acre. Additionally, two exploration programs in the northern part of the WSA would disturb 2 and 4 acres respectively through minimal access and drill pad construction.

Naturalness would be slightly impaired in the vicinity of two proposed spring developments at Upper Perish and Seep Springs. The spring areas would be fenced which would detract slightly from the feeling of naturalness in their immediate vicinity. This would be offset by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.

Naturalness would be benefited by the closure of the suitable area to mineral and energy exploration and possible development, and to woodland product harvest. There would also be a slight positive effect on naturalness with the closure of the suitable portion of the WSA to off-road vehicles. This action would halt the formation of new two-wheel tracks associated with repeated off-road use.

Naturalness (Nonsuitable Portion): Surface disturbance associated with mineral development and exploration activities would physically disturb and impair the natural character of 18 acres within the nonsuitable portion of the WSA. Approximately 18 acres would be stripped of thick tree cover for the by construction of beneficiation facilities and tailings pond for a small underground mine located within the suitable portion. The tailings pond would result in a modified landform which would detract from the natural character of the landscape and would be visible from the high country near Heath Peak and along the southern boundary road.

Surface disturbance totalling 10 acres would result from two wildcat oil and gas exploration wells on the east and west benches of the nonsuitable portion. Each 3-acre well pad would be stripped of vegetation and topsoil. Access to the well pads would total 4 acres of disturbance. The well pads would be reclaimed and restored to a natural condition in about 8 years. Seismic lines from geophysical exploration would leave 6 miles (12 acres) of noticeable linear tracks on the southeastern bench lasting approximately 15 years.

Vegetation treatment in the form of crested wheatgrass seedings proposed for 5,100 acres in the southeastern parts of the nonsuitable portion of the WSA would be accomplished by either plowing, prescribed burning, or the limited suppression of wildfire. In any case, the seeding would likely be accomplished with the use of a rangeland drill. The resulting block of crested wheatgrass would appear somewhat unnatural in comparison to the surrounding untreated area. The seedings would be fenced and this would also detract from the naturalness of the area.

A livestock well and a .5-mile pipeline with troughs would be built in the nonsuitable portion. The well would result in a 1-acre area denuded of vegetation due to livestock congregation. The pipeline construction would disturb a swath about 12 feet wide totalling less than 1 acre of surface disturbance.

CONCLUSIONS: The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, excellent opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, ponderosa pine stands, and raptor habitat. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 5,200 acres. The remaining 6,011 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 45,791-acre suitable portion of the Riordan's Well WSA and an additional 2,409 acres of non-WSA lands would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. This includes approximately 1,230 acres of moderate potential for metallic minerals. The remainder of the WSA is identified as having low potential for metallic minerals. Exploration and development of mineral resources on valid claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. Surface disturbance associated with exploration and development activities would include minimal access and haul roads, drill pads and waste dumps.

The underground mine anticipated within the WSA would occur even with wilderness designation. The mine would be located within the suitable portion of the WSA as would a 4-acre waste dump and 4 acres for haul roads. Tailings ponds support and beneficiation facilities would be located 1 mile south, in the nonsuitable portion of the WSA due to tighter wilderness restrictions. Waste dumps within the suitable portion would be reduced from 6 acres to 4 acres as a result of wilderness designation.

The 19 acres of surface disturbing exploration activity expected within the suitable portion of the WSA if designation does not occur would be reduced to 7 acres with designation.

All lands within the 11,211-acre nonsuitable portion of the WSA would remain open to mineral entry. All mineral resources would be available for exploration and development. This includes 1,720 acres of moderate potential for metallic minerals.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 47 acres of surface disturbing exploration and development activity expected within the suitable portion if designation does not occur would be reduced to 15 acres if designation occurs. Tailings ponds, support and beneficiation facilities for the mine would be located in the nonsuitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.



### Impacts on the Exploration and Development of Energy Resources

All lands within the 45,791-acre suitable portion of the Riordan's Well WSA and an additional 2,409 acres of non-WSA land would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA.

All lands within the 11,211-acre nonsuitable portion of the WSA would remain open to mineral leasing. All energy resources would be available for exploration and development. The entire WSA has been rated as having low potential for energy resources (oil, gas, and geothermal). Actual development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

**CONCLUSIONS:** Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the suitable and nonsuitable portions of the Riordan's Well WSA would not change. Within the suitable portion, Upper Perish and Seep Springs would be constructed following criteria in the Wilderness Management Policy.

Several proposed range projects within the suitable portion of the Riordan's Well WSA would not be allowed. These include one livestock well, the Lower Perish Spring pipeline, 3.5 miles of an allotment boundary fence, a 1,500-acre chaining, and portions of two fenced seedings totalling 4,000 acres.

Disallowing a well and pipeline would not affect current grazing, however, better cattle distribution would not be achieved. Additional forage for cattle would not be created within suitable portion of the WSA due to portions of the fenced seedings and chaining being prohibited. The remainder of the seedings and chaining could be accomplished outside of the WSA and still achieve the goal of increasing forage in the affected allotments. Minor cattle trespass would still continue as a result of not having the allotment boundary fence constructed.

In the nonsuitable portion of the WSA, the following proposed projects would occur: 5,100 acres of a 9,100-acre proposed seeding; a livestock well in Dry Basin; and a .5-mile pipeline in the southern portion of the WSA.



Solitude (Suitable Portion): Solitude would be affected in the southern part of the suitable portion of the WSA in the vicinity of the underground mining operation and also in the vicinity of mineral exploration activities in the central and northern part of the WSA.

Occasional vehicle use would detract from the feeling of solitude for those visitors in close proximity to the area's boundary roads and 6 miles of cherrystemmed routes. Periodic maintenance visits to the existing range developments would also affect the feeling of solitude.

The reduction of mineral exploration and the elimination of woodland products harvest and ORV use would have a positive effect on solitude within the suitable portion of the WSA.

Solitude (Nonsuitable Portion): Mineral and energy exploration activities and mineral development of a small underground mine would affect the wilderness value of solitude. Sights and sounds from traffic and construction related to exploration and development of mineral resources would lower the quality of solitude in the nonsuitable portion of the WSA, for the duration of the activities.

Treatment of 5,100 acres of sagebrush in the southeastern part of the nonsuitable portion would affect solitude during plowing and seeding activities. Solitude would also be affected by the use of heavy equipment needed to drill the water well and lay pipeline.

Occasional off-road vehicle use would detract from the feeling of solitude while range developments are being maintained and especially during the September-October hunting season. During years of peak pinyon nut crop, certain areas would experience an increase in nut harvesters in the autumn season.

Primitive and Unconfined Recreation (Suitable Portion): The impacts described in the naturalness and solitude sections above would also affect the opportunities for primitive and unconfined recreation, particularly in the southern portion of the area. The reduction of mineral exploration, woodland product harvest, and ORV use would have a positive effect on enhancing the opportunities for primitive recreation within the remainder of the suitable portion.

Primitive and Unconfined Recreation (Nonsuitable Portion): The presence of mineral development, mineral and energy exploration, vegetation treatment on 5,100 acres, and occasional ORV use would all combine to diminish the opportunity for primitive and unconfined recreation for the visitors near these disturbances.

Special Features: The highly scenic qualities of the Riordan's Well WSA including large stands of ponderosa pine, numerous caves, and avian wildlife are located almost entirely within the suitable portion of the WSA and would receive the added protection afforded from wilderness designation.

CONCLUSIONS: There would be no impacts to grazing facility maintenance. There would be a negative impact to grazing facility construction. The absence of some additional water developments would not affect current grazing, however, better cattle distribution would not be achieved. Minor cattle trespass would continue as a result of the allotment boundary fence not being allowed. Increased forage within the suitable portion of the WSA would be foregone by disallowing portions of two seedings and one chaining. There would be no impacts to grazing facility construction within the nonsuitable portion of the WSA.

CONCLUSIONS: There would be no impacts on grazing facility maintenance. Approximately 4,000 acres of a proposed 9,100-acre seeding would not be allowed within the suitable portion nor would a 1,500-acre chaining and 2½ miles of pipeline. There would be no impacts on grazing facility construction within the nonsuitable portion of the WSA.

#### Impacts on Woodland Products Harvest

The 45,791-acre suitable portion of the Riordan's Well WSA would not be available for commercial or private harvest of woodland products. The harvest of 14,100 cords of fuelwood and 2,400 posts and poles, and commercial sales of pinyon pine nuts would be foregone. This would be a minor impact since there are enough areas outside of the suitable portion of the WSA to supply woodland products for the foreseeable future.

The remaining 11,211-acre nonsuitable portion would be available for woodland product harvest. This would include commercial sales of pinyon pine nuts.

CONCLUSIONS: The harvest of 14,100 cords of fuelwood and 2,400 posts and poles and commercial sales of pine nuts within the area recommended as suitable for wilderness would be foregone. This would be a minor impact since woodland products readily available outside of this area could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.

#### Impacts on Recreational Off-Road Vehicle Use

Under this alternative, 45,791 acres of the Riordan's Well WSA and an additional 2,409 acres of non-WSA would be closed to all forms of recreational ORV use. The boundary roads and 6 miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 148 visitor days annually would be foregone in the suitable portion of the WSA. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Recreational ORV use foregone in the suitable portion of the WSA would be absorbed on the nonsuitable portion and on surrounding public lands.

## RIORDAN'S WELL

The remaining 11,211-acre, nonsuitable portion of the WSA would be managed as open for recreational ORV use.

CONCLUSIONS: Recreational ORV use of 148 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

## NO WILDERNESS ALTERNATIVE

### Impacts on Wilderness Values

The entire 57,002-acre Riordan's Well WSA would not be designated as wilderness and would receive no special legislative protection.

**Naturalness:** Surface disturbance associated with mineral exploration and development, including road and drill pad construction, waste dumps, tailings pond, and support facilities would physically disturb and impair the natural character of 47 acres within the WSA. A small underground mine would be developed in the southern portion of the WSA disturbing a total of 28 acres. The construction of the beneficiation and support facilities would result in the removal of thick tree cover which would be visible from the high country around Heath Peak and along the southern boundary road. The presence of a waste dump and tailings pond would result in permanent modified land forms that would detract from the natural character of the landscape. Three small exploration programs within the WSA would physically disturb a total of 19 acres. Surface disturbance would include road access, drill pad construction and trenching, resulting in an unnatural scarified appearance to the landscape, which would last many years.

Seismic lines from geophysical exploration would leave 6 miles (12 acres) of noticeable linear tracks on the southeastern bench lasting approximately 15 years.

Two spring developments and a 2.5-mile pipeline would be constructed within the WSA. Development activities with the use of a backhoe and bulldozer would have both short-term and long-term effects on the natural character of the WSA in the vicinity of the springs and pipeline route because of vegetation disturbance. Within 3 years of development, vegetation would become reestablished so that disturbance would be substantially unnoticeable near the springs. Structures associated with the spring developments such as troughs and fenced riparian enclosures would detract slightly from the natural character of the area. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of an ungrazed riparian areas. The pipeline route may appear as an unnatural corridor and would result in an additional 2.5 miles of new road for maintenance purposes.

A 1,500-acre pinyon-juniper chaining in the northern part of the WSA would result in large areas of vegetation disturbance and slash piles which would greatly affect the natural character in this area.

Vegetation treatment in the form of crested wheatgrass seedings proposed for 9,100 acres in the southeastern part of the WSA would be accomplished by either plowing, prescribed burning, or the limited suppression of wildfire. In any case, the seeding would likely be accomplished with the use of a rangeland drill. The resulting block of crested wheatgrass would appear somewhat unnatural in comparison to the surrounding, untreated area. The seedings would be fenced and would also detract from the naturalness of the area.

Two livestock wells and .5 mile of pipeline with troughs would be built. Each well would result in a 1-acre area denuded of vegetation due to livestock congregation. The pipeline would disturb a swath about 12 feet wide totalling less than 1 acre, and appear unnatural due to the resulting vegetation disturbance.

An allotment boundary fence totalling 3.5 miles in the northern portion of the WSA would have a slight effect on the perception of naturalness. An unnatural-appearing corridor would be visible to the user when in the immediate vicinity of the fence line. The fence, located within the interior of the WSA in a heavily wooded area would not be noticeable for any great distance.

Solitude: Mineral and energy exploration activities and mineral development of a small underground mine would affect the wilderness value of solitude. Sights and sounds from traffic and construction related to exploration and development of mineral resources would lower the quality of solitude in the southern portion of the WSA for the duration of the activities.

Solitude would also be impaired during the mechanical conversion of pinyon woodland in the northern part of the WSA. Treatment and seeding of 9,100 acres in the southeastern part of the WSA would affect solitude during plowing and seeding activities.

Sounds of chain saws within the chaining area from salvage woodcutters would impair solitude sporadically. Similarly, solitude would be affected in two areas of post and pole sales.

Occasional off-road vehicle use would detract from the feeling of solitude especially in the September-October hunting season. During years of peak pinyon nut crop, certain areas would experience an increase in nut harvesters in the autumn season.

Primitive and Unconfined Recreation: The presence of mineral development, mineral and energy exploration, commercial woodland products harvest, vegetation treatment on 10,600 acres, and occasional ORV use would all combine to diminish the opportunity for primitive and unconfined recreation for the visitors near these disturbances.

Special Features: The highly scenic qualities of the Riordan's Well WSA, including large stands of ponderosa pine, numerous caves, and avian wildlife are located almost entirely within the rugged high country of the WSA and would not be affected by the anticipated disturbances and developments.

## RIORDAN'S WELL

CONCLUSIONS: Long-term physical impairment to the wilderness qualities of the Riordan's Well WSA would occur on approximately 10,675 acres in the southern and north-central portion of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values within the WSA would not be impaired. Special geologic features, ponderosa pine stands, and raptor habitat would not be affected by a no wilderness designation. The remaining 46,327 acres would retain their wilderness values.

### Impacts on the Exploration and Development of Mineral Resources

All lands within the 57,002-acre Riordan's Well WSA would remain open to mineral entry. All potential minerals would be available for exploration and development. This includes 2,950 acres of moderate potential for metallic minerals in the western part of the WSA.

Because all minerals would remain available for development, there would be no impact to the exploration and development of mineral resources.

CONCLUSIONS: All lands within the Riordan's Well WSA would remain open for mineral entry. There would be no impact on the exploration and development of mineral resources.

### Impacts on the Exploration and Development of Energy Resources

All lands within the 57,002-acre Riordan's Well WSA would remain open to all forms of mineral leasing. Energy resource potential for the WSA is considered low and exploration or development of these resources (oil, gas, geothermal) is not anticipated. Because the WSA would remain available for mineral leasing, there would be no impact to the exploration and development of energy resources. Energy development is not expected to occur within the WSA.

CONCLUSIONS: All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

### Impacts on Grazing Facility Maintenance and Construction

Maintenance of existing range developments within the Riordan's Well WSA would not change. Development and fencing of one spring, construction of two pipelines and a livestock well would take place.

Vegetation treatment and seeding on 6,600 acres would be accomplished by prescribed burn or mechanical methods. Fences around the new seedings would be built.

CONCLUSIONS: There would be no impacts on grazing facility maintenance and construction within the Riordan's Well WSA.



Impacts on Woodland Products Harvest

The entire 57,002-acre Riordan's Well WSA would be available for commercial and private woodland products harvest. The harvest of 8,100 cords of fuelwood, 1,400 posts and poles, and commercial pinyon nut sales would occur.

CONCLUSIONS: There would be no impact on woodland products harvest.

Impacts on Recreational Off-Road Vehicle Use

The entire 57,002-acre Riordan's Well WSA would remain open to ORV use as designated in the Egan RMP. Recreational ORV use would remain below 300 visitor days annually for the foreseeable future.

CONCLUSIONS: There would be no impact to recreational ORV use.

## SOUTH EGAN RANGE WSA

NV-040-168

## PROPOSED ACTION (No Wilderness Alternative)

Impacts on Wilderness Values

Under the Proposed Action, the entire 96,916-acre South Egan Range WSA would not be designated as wilderness and would receive no special legislative protection.

Naturalness: Surface disturbance associated with mineral exploration activities, including access construction and drill pads, would physically disturb and impair a total of 17 acres within the WSA. Two exploration programs targeting precious metal mineralization would disturb 8 acres and 5 acres respectively in the northern portion of the WSA. A third exploration program southwest of Willow Spring Canyon in the east-central portion of the WSA would total 4 acres of surface disturbance. Construction of drill pads and access would result in localized areas of scarified topography which would last many years. Due to vegetative and topographic screening these disturbances would be visible only in their immediate vicinity. Development of mineral resources as a result of exploration is not anticipated.

On the eastern bench of the WSA, two wildcat oil and gas wells are anticipated. Surface disturbance from drilling activities would total 10 acres. Two 3-acre drill pads would be stripped of vegetation and topsoil which would be stockpiled for reclamation. Access construction to the well pads would total about 4 acres of surface disturbance. The well pads would be reclaimed and restored to a natural condition in about 8 years. Depending on the slope of the drill site, the well pads may result in a slightly modified landform which would essentially blend with the natural landscape after revegetation. Seismic lines from geophysical exploration would result in 5 miles (10 acres) of noticeable linear tracks lasting approximately 15 years.



## SOUTH EGAN RANGE

Two springs would be developed within the WSA. Surface disturbance resulting from development of the two springs would have a slight short-term effect on naturalness in the immediate vicinity of the springs due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside of the fenced areas. The presence of fences and troughs would detract slightly from the natural character in the immediate vicinity of the springs. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas. A proposed well and trough on the east side of the WSA would affect naturalness in their immediate vicinity. Approximately 1 acre would be denuded of vegetation by cattle congregation. Two stock reservoirs on the east side of the WSA would result in slightly modified landforms which would impair the perception of naturalness on the lower bench areas where the reservoirs would be located.

Three areas proposed for prescribed burns totalling 1,800 acres would have a negligible affect on naturalness. The burns would finger along drainages and create openings in the wooded areas and thicker brush. A 1,200-acre seeding would result in an area appearing somewhat unnatural in comparison to the surrounding untreated area. Prior to seeding, much of the area would have to be chained or burned to remove the trees. The contrast between the monotypic crested wheatgrass seeding and the surrounding trees and brush would be especially apparent along the seeding's edges.

A 120-acre fuelwood cutting area would be designated in the northwest portion of the WSA east of Lund, Nevada. The resulting partial clearcut of stumps and slash piles would affect the natural character of the WSA in that area. Two Christmas tree cutting areas in the northeastern part of the WSA, totalling 140 acres (60 acres and 80 acres, respectively) would leave stumps scattered through the sale areas and would have a slight detrimental effect on the natural character of the area in their immediate vicinity.

Solitude: The use of heavy equipment and associated traffic would disturb the area's solitude in the vicinity of the mineral and energy exploration as well as range project construction. The effect on solitude would be relatively short term and discontinuous within the WSA. Solitude would also be impaired by the sounds of chain saws within the woodcutting and Christmas tree areas. Based on the time of year and cordage, or number of Christmas trees the contractor was permitted to remove at one time, the effects on solitude would be sporadic.

Occasional off-road vehicle use would detract from the feeling of solitude, especially in October during hunting season. The lower use of recreational vehicles (less than 50 visitor use days) during the remainder of the year would lessen the impact, however.

Primitive and Unconfined Recreation: The presence of ongoing mineral exploration, range developments, commercial wood product harvest, and occasional ORV use would all combine to diminish the opportunity for primitive and unconfined recreation for visitors near these disturbances.

Special Features: The area's special features including bristlecone pine, caves, massive limestone cliffs, and their associated raptor habitat would be largely unaffected by a no wilderness designation.

CONCLUSIONS: Long-term physical impairment to the wilderness qualities of the South Egan Range WSA would occur on approximately 1,500 acres in the northern and eastern portions of the WSA. Opportunities for solitude and primitive and unconfined recreation would also be reduced. The highly scenic values, including bristlecone pine, unique geologic features, and raptor habitat would not be impaired or affected by a no wilderness designation. The remaining 95,416 acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the South Egan Range WSA would remain open to mineral entry. All potential minerals would be available for exploration and development. This includes 802 acres of high potential for metallic minerals and fluorite and 7,633 acres of moderate potential for metallic minerals. Both areas are located in the northern part of the WSA. Because all minerals would remain available for development, there would be no impact to the exploration and development of mineral resources.

CONCLUSIONS: All lands within the South Egan Range WSA would remain open to mineral entry. There would be no impact on the exploration and development of mineral resources.

#### Impacts on the Exploration and Development of Energy Resources

All lands within the 96,916-acre South Egan Range WSA would remain open to all forms of mineral leasing. Energy resource potential for the WSA is considered low with the exception of 328 acres along the west boundary having moderate geothermal potential. Because the WSA would remain available for mineral leasing, there would be no impact to the exploration or development of energy resources. Energy development is not expected to occur within the WSA.

CONCLUSIONS: All lands within the WSA would remain open to mineral leasing. There would be no impacts on the exploration and development of energy resources.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the South Egan Range WSA would not change. Two springs, one livestock well, and two stock reservoirs would be developed. In addition, three burns totalling 1,800 acres and one seeding totalling 1,200 acres would take place.

CONCLUSIONS: There would be no impacts on grazing facility maintenance and construction.

## SOUTH EGAN RANGE

### Impacts on Woodland Products Harvest

The entire 96,916-acre South Egan Range WSA would be available for commercial and private woodland products harvest. The harvest of 360 cords of fuelwood, 540 Christmas trees every 6 years, and commercial pinyon nut sales would take place.

CONCLUSIONS: There would be no impacts on woodland products harvest.

### Impacts on Recreational Off-Road Vehicle Use

The entire 96,916-acre South Egan Range WSA would remain open to ORV use as designated in the Egan RMP. Recreational ORV use would remain below 400 visitor days annually for the foreseeable future.

CONCLUSIONS: There would be no impacts to recreational ORV use.

### ADVERSE IMPACTS WHICH CANNOT BE AVOIDED

The only unavoidable adverse impacts would be those associated with the loss of wilderness values from mineral and energy exploration. Some of these impacts may be reduced by careful examination and mitigating stipulations in environmental assessments.

### RELATIONSHIP BETWEEN SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Nondesignation of the WSA would allow all present short-term uses to continue. Mineral and energy exploration, woodland product harvest, and ORV use would reduce wilderness values over the long-term.

### IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Mineral and energy exploration would create an irreversible commitment of wilderness resources.

## ALL WILDERNESS ALTERNATIVE

### Impacts on Wilderness Values

The entire 96,916-acre South Egan Range WSA would receive special legislative protection provided by wilderness designation.

Naturalness: Surface disturbance associated with mineral exploration activities on valid claims, including minimal access construction and drill pads, would physically disturb and impair the natural character of 4 acres within the northern part of the WSA. Two exploration programs (3 acres and 1 acre, respectively) targeting precious metal mineralization would be limited to vehicle travel on existing roads or cherrystemmed routes or by

cross-country travel. Drill rigs would be mounted on rubber-tired vehicles, or be helicopter-portable. Minimal clearing of topsoil and vegetation would be required for drill pad locations, and reclamation would be required to restore the area to a natural appearance. Drill pads would result in isolated areas of scarified or modified topography, appearing somewhat unnatural.

On the eastern bench of the WSA, two exploratory oil and gas wells are anticipated. Surface disturbance from drilling activities would total 10 acres. Two 3-acre drill pads would be stripped of vegetation and topsoil which would be stockpiled for reclamation. Access construction to the well pads would total about 4 acres of surface disturbance. The well pads would be reclaimed and restored to a natural condition in about 8 years. Depending on the slope of the drill site, the well pads may result in a slightly modified landform which would essentially blend with the natural landscape after revegetation.

Two springs would be developed within the WSA. Surface disturbance resulting from development of the two springs would have a slight short-term effect on naturalness in the immediate vicinity of the springs due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside of the fenced areas. The presence of fences and troughs would detract slightly from the natural character in the immediate vicinity of the springs. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.

Naturalness would be benefited by the closure of the WSA to mineral and energy exploration and possible development, and to the woodland product harvest all of which would occur without wilderness designation. There would also be a slight positive effect on naturalness due to the closure of the WSA to off-road vehicle use, which would halt the formation of new two-wheel tracks associated with repeated off-road use.

Solitude: The use of heavy equipment and associated traffic would disturb the area's solitude in the vicinity of the mineral and energy exploration. The impact on solitude would be relatively short-term and discontinuous within the WSA.

Occasional off-road vehicle use would detract from the feeling of solitude for those visitors in close proximity to the WSA's boundary roads and 46 miles of cherrystemmed routes. The reduction of mineral exploration and the elimination of woodland products harvest and ORV use would have a positive effect on solitude within the WSA.

Primitive and Unconfined Recreation: The presence of mineral and energy exploration, and occasional ORV use along the cherrystemmed routes would slightly detract from the enjoyment of a primitive and unconfined type of recreation. The reduction of additional mineral and energy exploration and the elimination of woodland products harvest would have a positive effect on enhancing the area's opportunities for primitive and unconfined recreation.

## SOUTH EGAN RANGE

Special Features: The area's special features including bristlecone pine, caves, unique geologic features and raptor habitat would remain protected under this alternative. They would receive the added protection from tighter restrictions placed on surface disturbing activities within wilderness.

CONCLUSIONS: The result of designation of the South Egan Range WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special geologic features, highly scenic values, bristlecone pine, and raptor habitat would also be preserved. Long-term physical impacts to the wilderness quality of the South Egan Range WSA would occur on about 14 acres.

### Impacts on the Exploration and Development of Mineral Resources

The entire 96,916-acre South Egan Range WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. This includes approximately 802 acres of high potential for metallic minerals and fluorite and 7,633 acres of moderate potential for metallic minerals. Exploration for mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. The 17 acres of surface disturbance associated with mineral exploration expected to occur without wilderness designation would be reduced to 4 acres as a result of tighter wilderness restrictions. Surface disturbance associated with exploration activities would include minimal access and drill pad construction.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the WSA. The 17 acres of surface disturbing exploration activity expected if designation does not occur would be reduced to 4 acres within the WSA if designation occurs. Favorability for development of mineral resources is low within the WSA and development of mineral resources is not expected.

### Impacts on the Exploration and Development of Energy Resources

The entire 96,916-acre South Egan Range WSA would be withdrawn from all forms of mineral leasing. Development of energy resources would be foregone on all unleased lands within the WSA. The entire WSA is identified as having low potential for energy resources with the exception of 328 acres along the west boundary having a moderate potential for geothermal resources.

The 20 acres of surface disturbance (two wildcat oil wells and 5 miles of seismic line) associated with energy exploration expected to occur without wilderness designation would be reduced to 10 acres as a result of tighter wilderness restrictions. The two wildcat wells would be allowed on existing leases, but seismic exploration would not take place. Regardless of wilderness designation, development of energy resources is not expected.



CONCLUSIONS: All lands within the WSA would be withdrawn from mineral leasing. Two wildcat oil wells would be drilled on existing leases. Geophysical exploration totalling 5 miles would be foregone due to tighter wilderness restrictions. Favorability for development of energy resources is low within the WSA and development is not expected.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the South Egan Range WSA would not change. Schoolhouse and Stink Pot Springs would be developed following criteria in the Wilderness Management Policy. One livestock well would be located outside of the WSA and two stock reservoirs would not be constructed. Prescribed burns on 1,800 acres would not be allowed. A 1,200-acre seeding would be located outside of the WSA.

CONCLUSIONS: There would be no impacts to grazing facility maintenance. There would be minor impacts to grazing facility construction. Most of the disallowed projects (prescribed burns, seedings, and water developments) could be located outside of the WSA boundary and still achieve the same goals. Absence of these projects within the WSA would have no impact on current grazing in the area.

#### Impacts on Woodland Products Harvest

The entire 96,916-acre South Egan Range WSA would not be available for commercial or private harvest of woodland products. The harvest of 360 cords of fuelwood, 540 Christmas trees every 6 years, and commercial sales of pinyon pine nuts would be foregone. This would be a minor impact since there are enough areas outside of the WSA to supply woodland products for the foreseeable future.

CONCLUSIONS: The harvest of 540 Christmas trees every 6 years and 360 cords of fuelwood and commercial sales of pinyon pine nuts within the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the WSA could satisfy demand.

#### Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 96,916-acre South Egan Range WSA to all forms of recreational ORV use. The boundary roads and the 46 miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 320 visitor days annually would be foregone. Hunters using vehicles off existing roads would be the main recreational group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use foregone in the WSA would be absorbed on surrounding public lands.

CONCLUSIONS: Recreational ORV use of 320 visitor days annually would be foregone. The impacts of shifting this use to other public lands would be negligible.



PARTIAL WILDERNESS ALTERNATIVE NO. 1

Impacts on Wilderness Values

Under this alternative, 57,660 acres of the South Egan Range WSA would receive special legislative protection provided by wilderness designation. The remaining 39,256 acres would receive no special protection.

Naturalness (Suitable Portion): Two springs would be developed within the WSA. Surface disturbance resulting from development of the two springs would have a slight short-term effect on naturalness in the immediate vicinity of the springs due to vegetation disturbance. The spring sources would be fenced and troughs would be placed outside of the fenced areas. The presence of fences and troughs would detract slightly from the natural character in the immediate vicinity of the springs. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of ungrazed riparian areas.

Naturalness would be benefited by the elimination of mineral and energy exploration and possible development within the suitable portion. There would be a slight positive effect on naturalness with the closure of the suitable portion of the WSA to off-road vehicles. This action would halt the formation of new two-wheel tracks associated with repeated off-road use. Naturalness would also be benefited by the absence of commercial fuelwood and Christmas tree harvest areas and the absence of new range developments.

Naturalness (Nonsuitable Portion): Surface disturbance associated with mineral exploration activities, including access construction and drill pads, would physically disturb and impair a total of 13 acres within the WSA. Two exploration programs targeting precious metal mineralization would disturb 8 acres and 5 acres, respectively, in the northern portion of the WSA. Construction of drill pads and access would result in localized areas of scarified topography which would last many years. Development of mineral resources as a result of exploration is not expected to take place.

On the eastern bench of the nonsuitable portion of the WSA, two wildcat oil and gas wells are anticipated. Surface disturbance from drilling activities would total 10 acres. Two 3-acre drill pads would be stripped of vegetation and topsoil which would be stockpiled for reclamation. Access construction to the well pads would total about 4 acres of surface disturbance. The well pads would be reclaimed and restored to a natural condition in about 8 years. Depending on the slope of the drill site, the well pads may result in a slightly modified landform which would essentially blend with the natural landscape after revegetation.

Seismic lines from geophysical exploration would result in 5 miles (10 acres) of noticeable linear tracks within the nonsuitable portion lasting approximately 15 years.

A proposed well and trough on the east side of the WSA would affect naturalness in their immediate vicinity. Approximately 1 acre would be denuded of vegetation by cattle congregation.

One stock reservoir on the east side of the WSA would result in slightly modified landform which would impair the perception of naturalness on the lower bench areas where the reservoir would be located.

One 600-acre area proposed for a prescribed burn would have a negligible affect on naturalness. The burn would finger along a drainage and create openings in the wooded areas and thicker brush.

A 120-acre fuelwood cutting area would be designated in the northwest part of the nonsuitable portion of the WSA east of Lund, Nevada. The resulting partial clearcut of stumps and slash piles would affect the natural character of the WSA in that area. Two Christmas tree cutting areas in the northeastern part of the nonsuitable portion, totalling 140 acres (60 acres and 80 acres, respectively) would leave stumps scattered through the sale areas and would have a slight detrimental effect on the natural character of the area.

Solitude (Suitable Portion): Opportunities for solitude would be preserved within the suitable portion of the WSA. Vehicular access for maintenance of range developments would be sporadic and would have only negligible effects on opportunities for solitude.

Solitude (Nonsuitable Portion): The use of heavy equipment and associated traffic would disturb the area's solitude in the vicinity of the mineral and energy exploration. The impact on solitude would be relatively short term and discontinuous within the nonsuitable portion. Solitude would also be impaired by the sounds of chain saws within the woodcutting and Christmas tree areas. Based on the time of year and cordage, or number of Christmas trees the contractor was permitted to remove at one time, the effects on solitude would be sporadic.

Occasional off-road vehicle use would detract from the feeling of solitude especially in October during hunting season. The lower use of recreational vehicles (less than 30 visitor use days) during the remainder of the year would lessen the impact, however.

Primitive and Unconfined Recreation (Suitable Portion): Opportunities for primitive recreation would be preserved. There are no adverse impacts anticipated within the suitable portion of the WSA.

Primitive and Unconfined Recreation (Nonsuitable Portion): The presence of ongoing mineral exploration, commercial wood product harvest, and occasional ORV use would all combine to diminish the opportunity for primitive and unconfined recreation for visitors near these disturbances within the nonsuitable portion of the WSA.

Special Features: The area's special features including bristlecone pine, caves, massive limestone cliffs, and their associated raptor habitat occur primarily within the suitable portion of the WSA and would not be affected by the expected disturbances.

CONCLUSIONS: The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special features such as bristlecone pine, caves, raptor habitat, and highly scenic values. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 300 acres. The remaining 38,956 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 57,660-acre suitable portion of the South Egan Range WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. This includes approximately 4,300 acres of moderate potential for metallic minerals. The remainder of the WSA is identified as having low potential for metallic minerals. Exploration for mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. Exploration for mineral resources is not expected within the suitable portion. Without wilderness designation, surface disturbing exploration activities would total 4 acres within the suitable portion of the WSA. This exploration would be eliminated due to a lack of valid claims should the suitable portion be designated as wilderness.

All lands within the 39,256-acre nonsuitable portion of the WSA would remain open to mineral entry. All potential minerals would be available for exploration and development. This includes 3,333 acres of moderate potential for metallic minerals and 802 acres of high potential for metallic minerals and fluorite. Actual development of mineral resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The 4 acres of surface disturbing exploration activity expected within the suitable portion if designation does not occur would be eliminated if designation occurs due to lack of valid claims. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

#### Impacts on the Exploration and Development of Energy Resources

All lands within the 57,660-acre suitable portion of the South Egan Range WSA would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA.

All lands within the 39,256-acre nonsuitable portion of the WSA would remain open to mineral leasing. This includes 328 acres identified as having moderate potential for geothermal resources. All energy resources would be available for exploration and development. Actual development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

**CONCLUSIONS:** Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development energy resources within the nonsuitable portion of the WSA.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the suitable and nonsuitable portions of the South Egan Range WSA would not change. Schoolhouse and Stink Pot Springs would be developed following criteria in the Wilderness Management Policy. Two prescribed burns totalling 1,200 acres and a stock reservoir would not be allowed. A 1,200-acre seeding would be located outside of the suitable portion of the WSA.

Within the nonsuitable portion of the WSA, a prescribed burn totalling 600 acres would take place. A livestock well and a stock reservoir would be developed.

**CONCLUSIONS:** There would be no impacts to grazing facility maintenance. There would be minor impacts to grazing facility construction within the suitable portion. The disallowed projects (prescribed burns, seedings, and a stock reservoir) could be located outside of the WSA boundary and still achieve the same goals. Absence of these projects within the suitable portion would have no impact on current grazing in the area. There would be no impacts on grazing facility construction within the nonsuitable portion.

#### Impacts on Woodland Products Harvest

The 57,660-acre suitable portion of the South Egan Range WSA would not be available for commercial or private harvest of woodland products. No commercial or private woodland products sales are proposed for the suitable portion of the WSA. The commercial harvest of pinyon pine nuts within the suitable portion would be foregone. This would be a minor impact since there are enough areas outside of the suitable portion of the WSA to supply woodland products for the foreseeable future. The remaining 39,256-acre nonsuitable portion would be available for woodland product harvest. This would include a 120-acre greenwood cutting area and two commercial Christmas tree sales totalling 140 acres.

CONCLUSIONS: The commercial harvest of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.

#### Impacts on Recreational Off-Road Vehicle Use

Under this alternative, 57,660 acres of the South Egan Range WSA would be closed to all forms of recreational ORV use. The boundary roads and 27 miles of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 192 visitor days annually would be foregone in the suitable portion of the WSA. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Recreational ORV use foregone in the suitable portion of the WSA would be absorbed on the nonsuitable portion and on surrounding public lands.

The remaining 39,256-acre, nonsuitable portion of the WSA would continue to be managed as open for recreational ORV use.

CONCLUSIONS: Recreational ORV use of 192 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

### PARTIAL WILDERNESS ALTERNATIVE NO. 2

#### Impacts on Wilderness Values

Under this alternative, 16,560 acres of the South Egan Range WSA would receive special legislative protection provided by wilderness designation. The remaining 80,356 acres would receive no special protection.

Naturalness (Suitable Portion): Schoolhouse Spring would be developed within the suitable portion of the WSA. Surface disturbance resulting from development of the spring would have a slight short-term effect on naturalness in its immediate vicinity due to vegetation disturbance. The spring source would be fenced and a trough would be placed outside of the fenced area. The presence of a fence and trough would detract slightly from the natural character in the immediate vicinity of the spring. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of an ungrazed riparian area.

Naturalness (Nonsuitable Portion): Surface disturbance associated with mineral exploration activities, including access and drill pad construction, would physically disturb and impair a total of 17 acres within the WSA. Two exploration programs targeting precious metal mineralization in the northern portion of the WSA would disturb 8 acres and 5 acres respectively. A third exploration program southwest of Willow Spring Canyon in the east-central



portion of the WSA would total 4 acres of surface disturbance. Construction of drill pads and access would result in localized areas of scarified topography which would last many years. Development of mineral resources as a result of exploration is not anticipated.

On the eastern bench of the WSA, two wildcat oil and gas wells are anticipated. Surface disturbance from drilling activities would total 10 acres. Two 3-acre drill pads would be stripped of vegetation and topsoil which would be stockpiled for reclamation. Access construction to the well pads would total about 4 acres of surface disturbance. The well pads would be reclaimed and restored to a natural condition in about 8 years. Depending on the slope of the drill site, the well pads may result in a slightly modified landform which would essentially blend with the natural landscape after revegetation.

One spring would be developed within the nonsuitable portion of the WSA. Surface disturbance resulting from development of the spring would have a slight short-term effect on naturalness in the immediate vicinity of the spring due to vegetation disturbance. The spring source would be fenced and a trough would be placed outside of the fenced area. The presence of the fence and trough would detract slightly from the natural character in the immediate vicinity of the spring. This would be offset, however, by the reestablishment of vegetation within 3 years and the presence of an ungrazed riparian area.

A proposed well and trough on the east side of the WSA would affect naturalness in their immediate vicinity. Approximately 1 acre would be denuded of vegetation by cattle congregation.

Two stock reservoirs on the east side of the WSA would result in slightly modified landforms which would impair the perception of naturalness on the lower bench areas where the reservoirs would be located.

Three areas proposed for prescribed burns totalling 1,800 acres would have a negligible affect on naturalness. The burns would finger along drainages and create openings in the wooded areas and thicker brush. A 1,200-acre seeding would result in an area appearing somewhat unnatural in comparison to the surrounding untreated area. Prior to seeding, much of the area would have to be chained or burned to remove the trees. The contrast between the monotypic crested wheatgrass seeding and the surrounding trees and brush would be especially apparent along the seeding's edges.

Seismic lines from geophysical exploration would result in 5 miles (10 acres) of noticeable linear tracks within the nonsuitable portion lasting approximately 15 years.

A 120-acre fuelwood cutting area would be designated in the northwest portion of the WSA east of Lund, Nevada. The resulting partial clearcut of stumps and slash piles would affect the natural character of the WSA in that area. Two Christmas tree cutting areas in the northeastern part of the nonsuitable portion, totalling 140 acres (60 acres and 80 acres, respectively) would leave stumps scattered through the sale areas and would have a slight detrimental effect on the natural character of the area.



Solitude (Suitable Portion): Opportunities for solitude would be preserved. There are no adverse impacts anticipated within the suitable portion of the WSA.

Solitude (Nonsuitable Portion): The use of heavy equipment and associated traffic would disturb the area's solitude in the vicinity of the mineral and energy exploration as well as near the range project construction. The impact on solitude would be relatively short term and discontinuous within the WSA. Solitude would also be impaired by the sounds of chain saws within the woodcutting and Christmas tree areas. Based on the time of year and cordage, or number of Christmas trees the contractor was permitted to remove at one time, the effects on solitude would be sporadic.

Occasional off-road vehicle use would detract from the feeling of solitude, especially in October during hunting season. The lower use of recreational vehicles (less than 9 visitor use days) during the remainder of the year would lessen the impact, however.

Primitive and Unconfined Recreation (Suitable Portion): Opportunities for primitive recreation would be preserved. There are no adverse impacts anticipated within the suitable portion of the WSA.

Primitive and Unconfined Recreation (Nonsuitable Portion): The presence of on going mineral exploration, commercial wood product harvest, and occasional ORV use would all combine to diminish the opportunity for primitive and unconfined recreation for visitors near these disturbances.

Special Features: The WSA's special features including bristlecone pine, caves, massive limestone cliffs, and their associated raptor habitat are located in both the suitable and nonsuitable portions of the WSA. These features would remain largely unaffected regardless of wilderness designation.

**CONCLUSIONS:** The result of designating the suitable portion of the WSA as wilderness would be to preserve the naturalness, outstanding opportunities for solitude and primitive and unconfined recreation; special features such as bristlecone pine, caves, raptor habitat, and highly scenic values. Long-term negative impacts to the wilderness qualities in the nonsuitable portion of the WSA would occur on approximately 1,500 acres. The remaining 78,856 nonsuitable acres would retain their wilderness values.

#### Impacts on the Exploration and Development of Mineral Resources

All lands within the 16,560-acre suitable portion of the South Egan Range WSA would be withdrawn from all forms of mineral entry. Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. The entire suitable portion of the WSA is identified as having a low potential. Exploration for mineral resources on valid existing claims would be done in a manner that minimizes impacts on the wilderness resource while protecting the rights of the operator. Exploration of mineral resources is not anticipated within the suitable portion of the WSA.

All lands within the 80,356-acre nonsuitable portion of the WSA would remain open to mineral entry. All minerals would be available for exploration and development. This includes 802 acres of high potential for metallic minerals and fluorite and 7,633 acres of moderate potential for metallic minerals. Actual development of mineral resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Exploration and development of mineral resources would be foregone on all unclaimed lands within the suitable portion of the WSA. Exploration of mineral resources is not anticipated to occur within the suitable portion of the WSA. All lands within the nonsuitable portion of the WSA would remain open to mineral entry. There would be no impacts on the exploration and development of mineral resources within the nonsuitable portion of the WSA.

#### Impacts on the Exploration and Development of Energy Resources

All lands within the 16,560-acre suitable portion of the South Egan Range WSA would be withdrawn from all forms of mineral leasing. Exploration and development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA.

All lands within the 80,356-acre nonsuitable portion of the WSA would remain open to mineral leasing. This includes 328 acres identified as having moderate potential for geothermal resources. All energy resources would be available for exploration and development. Actual development of energy resources is not expected within either the suitable or nonsuitable portions of the WSA as a result of exploration.

CONCLUSIONS: Development of energy resources would be foregone on all unleased lands within the suitable portion of the WSA. Exploration for energy resources is not anticipated within the suitable portion of the WSA. Favorability for development of energy resources is low within the entire WSA. Development of energy resources is not expected to take place within either the suitable or nonsuitable portions of the WSA. There would be no impacts on the exploration and development of energy resources within the nonsuitable portion of the WSA.

#### Impacts on Grazing Facility Maintenance and Construction

Maintenance of the existing range developments within the suitable and nonsuitable portions of the South Egan Range WSA would not change. Schoolhouse Spring would be developed following criteria in the Wilderness Management Policy. Within the nonsuitable portion of the WSA, one spring, a livestock well, and two stock reservoirs would be developed. Three prescribed burns totalling 1,800 acres and a 1,200-acre seeding would take place.

CONCLUSIONS: There would be no impacts on grazing facility maintenance and construction.

Impacts on Woodland Products Harvest

The 16,560-acre suitable portion of the South Egan Range WSA would not be available for commercial or private harvest of woodland products. No commercial or private woodland products sales are proposed for the suitable portion of the WSA. The commercial harvest of pinyon pine nuts within the suitable portion would be foregone. This would be a minor impact since there are enough areas outside of the suitable portion of the WSA to supply woodland products for the foreseeable future.

The remaining 80,356-acre nonsuitable portion would be available for woodland product harvest. This would include a 120-acre greenwood cutting area and two commercial Christmas tree sales totalling 140 acres.

CONCLUSIONS: The commercial harvest of pine nuts within the suitable portion of the WSA would be foregone. This would be a minor impact since woodland products readily available outside of the suitable portion of the WSA could satisfy demand. There would be no impact on woodland products harvest within the nonsuitable portion of the WSA.

Impacts on Recreational Off-Road Vehicle Use

Under this alternative, 16,560 acres of the South Egan Range WSA would be closed to all forms of recreational ORV use. The boundary roads and 1 mile of cherrystemmed routes would continue to provide vehicular access into the WSA. Estimated off-road recreational ORV use of 54 visitor days annually would be foregone in the suitable portion of the WSA. Hunters using vehicles off existing roads would be the main recreational user group affected since little other off-road use occurs. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Recreational ORV use foregone in the suitable portion of the WSA would be absorbed on the nonsuitable portion and on surrounding public lands.

The remaining 80,356-acre, nonsuitable portion of the WSA would continue to be managed as open for recreational ORV use.

CONCLUSIONS: Recreational ORV use of 54 visitor days annually would be foregone. The impacts of shifting this use to the nonsuitable portion of the WSA or to other public lands would be negligible.

## CHAPTER 5

# Consultation and Coordination

### INTRODUCTION

This Final Wilderness Environmental Impact Statement for the Egan Resource Area has been prepared by specialists from the Ely District Office with assistance from the Nevada State Office. The entire wilderness review process has involved public participation since its initiation in 1978 with the wilderness review required by FLPMA. The process included inventories of resources, public participation, and coordination with individuals, organizations, and other agencies. Care has been exercised to ensure that the public has been consulted and informed throughout the wilderness review process.

### PUBLIC INVOLVEMENT

The Federal Register notice announcing the filing of the draft plan and Environmental Impact Statement and its availability to the public appeared in the September 23, 1983, issue of the Federal Register. In addition, this notice stated that public hearings would be held in Ely and Reno, Nevada, and that the public review period for the draft document would end on December 24, 1983. News releases were also issued to announce the availability of the draft document.

A public hearing was held in Ely on October 25, 1983. Nine people attended the meeting and four of them made oral statements. A second hearing was held in Reno on October 26, 1983. It was attended by forty-two members of the public, twenty-one of whom made oral statements. The transcripts of these public meetings are available for inspection at the Ely District Office Bureau of Land Management, and those dealing with wilderness are reprinted in this document.

In addition to the public hearings, briefings were offered to the State of Nevada Clearinghouse on November 8, 1983, and to the Nevada Congressional Delegations on November 7, 1983.

Throughout the study, consultation, and coordination has occurred with other federal agencies; state, county, and local governments; and the public. The Egan Draft RMP/EIS and Wilderness Technical Report were mailed out to the persons on the wilderness mailing list on September 9, 1983. An abbreviated form of those contacted follows.

## FEDERAL AGENCIES

Department of Agriculture  
Soil Conservation Service  
\* U.S. Forest Service

Department of the Interior  
\* Bureau of Indian Affairs  
Bureau of Land Management  
\* Bureau of Mines  
\* Bureau of Reclamation  
\* National Park Service  
\* U.S. Fish and Wildlife Service  
\*\*U.S. Geological Survey

\* U.S. Environmental Protection Agency

White Pine, Nye and Lincoln  
County Extension Agents

## STATE AGENCIES

\* Nevada Bureau of Mines  
\* Nevada Department of Agriculture  
\* Nevada Department of Conservation  
and Natural Resources  
Nevada Department of Transportation  
\* Nevada Department of Wildlife

## LOCAL AGENCIES

\* White Pine County Commission  
Lincoln and Nye County Commissions  
Lincoln and Nye Planning Commissions  
\* White Pine Regional Planning Commission  
Central Nevada Development Authority  
\* Ely City Council  
\* Lund Town Council  
Ruth and McGill Town Councils

## PUBLIC LIBRARIES

White Pine, Lincoln and Nye County Libraries  
Nevada State Library  
University of Nevada Library

\* A written response was received and is published in the following section.

\*\* No written response was received, but a telephone confirmation is in the files stating the agency had no comments.

BLM ADVISORY COUNCILS

Ely District Grazing Board  
 Ely District Advisory Council  
 Nevada State Grazing Board

NATIVE AMERICAN COUNCILS

Duckwater Tribal Council  
 Ely Colony Council

CONSERVATION GROUPS

- American Horse Protection Association
- Animal Protection Institute
- \* Conservation Call
- \* Defenders of Wildlife
- \* Eastern Nevada Trappers & Furtakers Association
- \* Ecology Center of Southern California
- \* Lahontan Audubon Society
- National Wildlife Federation
- Natural Resources Defense Council
- The Nature Conservancy
- Nevada Archaeological Association
- \* Nevada Outdoor Recreation Association
- \* Nevada Wilderness Association
- Nevada Wildlife Federation
- \* Sierra Club
- \* White Pine Sportsman's Club
- \* The Wilderness Society
- Wild Horse Organized Assistance
- The Wildlife Society

GRAZING INTERESTS

Egan Resource Area Permittees  
 National Cattleman's Association  
 Nevada Cattleman's Association  
 Nevada Woolgrowers Association  
 White Pine County Farm Bureau

MINERAL INDUSTRIES

- Amselco Minerals, Inc.
- \* Atlantic Richfield
- Bear Creek Mining Company
- Boudy and Foreman
- Chevron Resource Co.
- Ely Valley Mines
- Exxon Minerals Co.

\* A written response was received and is published in the following section.



- \* Gold Prospectors Association of America  
Kennecott Minerals Co.
- \* Mineralogical Research Co.  
Northeastern Nevada Miners  
and Prospectors Association
- \* Nevada Mining Association  
Placer Amex  
Silver King Mines  
Superior Oil Company  
Texaco Incorporated  
White Pine Minerals Corporation

OTHER ORGANIZATIONS/COMPANIES

- Mt. Wheeler Power Company  
Nevada Power Company  
Pacific Legal Foundation  
Public Lands Institute  
Public Lands Council
- \* Resource Concepts, Inc.  
Sierra Pacific Power Company  
White Pine County Chamber of Commerce  
White Pine Power Project  
Local and Regional Newspapers  
Other Interested Individuals & Organizations

ELECTED REPRESENTATIVES

State

- \* Governor Richard Bryan  
Assemblyman Virgil Getto  
Senator Richard Blakemore

Federal

Representative Barbara Vucanovich  
Senator Chic Hecht  
Senator Paul Laxalt

- \* A written response was received and is published in the following section.

## CONSISTENCY WITH OTHER PLANS

### Federal Agencies

The Proposed Action does not conflict with any known plan of any Federal agency.

### State Agencies

The Proposed Action does not conflict with any known state plans. The Nevada Division of State Parks supports wilderness designation as being consistent with their Statewide Comprehensive Outdoor Recreation Plan.

### County Governments

White Pine, Lincoln, and Nye Counties have adopted Policy Plans for Public Lands. These plans generally encourage and stress multiple use of the public lands but regard wilderness designation as a single use which does not allow for the multiple use type of management which they would prefer.

All three county plans encourage agricultural development and request that the Federal Government preserve and promote agricultural pursuits. This is generally compatible with wilderness designation. The Lincoln County Plan, however, states that, "Range improvement projects should be developed to improve grazing." Wilderness designation could put some restrictions on the type and manner of construction of range developments within designated wilderness. There may be some range improvements in Lincoln County which would be foregone because of wilderness designation. While this will technically conflict with the Lincoln County Plan, range developments can be implemented in the majority of the county, and depending on the specific project, may be implemented within the wilderness areas as well.

All three county plans encourage the promotion and expansion of mining exploration and development. This is a potential conflict with wilderness designation in that mineral development would be confined to areas with valid and existing rights. In addition, new mining claims would not be allowed.

All three county plans state that wilderness should only be designated where its values would outweigh other resource values and uses which would be foregone. The Lincoln County Plan further states that, "It is generally felt that there are no areas suitable for wilderness designation in Lincoln County." Wilderness designation would be inconsistent with this section of the Lincoln County Plan.

Wilderness designation would be in compliance with the majority of policy statements for federal lands of the three counties. All of the counties expressed interest in introducing bighorn sheep and elk. Some of the counties specify existing WSA's as suitable habitat for these introductions. This would be allowed within designated wilderness.

All three county plans recognize that outdoor recreation opportunities play an important part in the lifestyles and economy in the county; backcountry-type dispersed and unstructured recreational activities are to be provided and encouraged. This is also compatible with wilderness designation.

#### Native Americans

Representatives of Native American groups in Ely, Duckwater, and Elko have been invited to comment and to attend public wilderness meetings throughout the review process. The Bureau knows of no conflicts between wilderness designation and Native American traditional or religious uses of the land. The Western Shoshone People claim their aboriginal title to the land, which includes much of the Egan Resource Area, has never been extinguished.

#### COMMENTS AND RESPONSES

All of the letters and oral testimony on the Egan Draft RMP/EIS and the Wilderness Technical Report were reviewed. Since wilderness was only one of the issues discussed in the RMP/EIS, many of the letters in this document have comments relating to the grazing and realty sections in the RMP/EIS. These nonwilderness-type comments are not responded to in this document, and only those letters specifically addressing wilderness have been reprinted. The Proposed Egan RMP and Final EIS contains all of the letters received and all the issues have had responses prepared.

A total of 74 letters were received from the public on the draft RMP/EIS. Most of these (69 letters) mentioned wilderness, and these are printed here. The letters and testimonies printed in the next section are grouped as follows: federal agencies, state/local agencies, organizations/companies, and individuals. The numbers in the left margins adjacent to each issue addressed refer to numbered responses following each document. Each letter and testimony was addressed individually in this manner. Comments from the Nevada State Clearinghouse were counted as one letter although they were composed of individual agency comments.

There were 21 oral testimonies given and these are grouped in the same manner as the letters. Table 8 contains a list of all the commentators by number and corresponding name.

TABLE 8  
INDEX OF PUBLIC COMMENT

Comment No.    Commentor

LETTERS

Federal Agencies

1	USDI Bureau of Indian Affairs
2	USDI Bureau of Mines
3	USDI Bureau of Reclamation
4	USDI Fish and Wildlife Service
5	USDI National Park Service
6	U.S. Environmental Protection Agency
7	USDA Forest Service

State/Local Agencies

8	Governor Bryan
9	Nevada State Clearinghouse
10	White Pine County Commissioners
11	Regional Planning Commission
12	City of Ely
13	Lund Town Council

Organizations/Companies

14	Atlantic Richfield Company
15	Conservation Call
16	Defenders of Wildlife
17	Eastern Nevada Trappers and Furtakers Association
18	Ecology Center of Southern California
19	Lahonton Audobon Society, Inc.
20	Mineralogical Research Company
21	Nevada Mining Association
22	Nevada Outdoor Recreation Association
23	Resource Concepts Inc.
24	Nevada Wilderness Association
25	Sierra Club
26	White Pine Sportsmen
27	The Wilderness Society
28	Gold Prospectors Association of America/ Reno Prospectors Supply, Inc.

## Individuals

29	Rudy Adams
30	Brent Boyer
31	M. P. Boysen
32	Steven Carter
33	Marguerite Christoph
34	Cheri Cinkoske
35	Paul C. Clifford
36	Harold L. Dittmer
37	Ward T. Donley
38	Craig C. Downer
39	Gregory P. Ebner
40	Ken Goldsmith
41	Doug Hansen
42	B. W. Hendrix
43	Maxine and Emil Hrubik
44	Joanna G. Ihnatowicz
45	Barbara Kelley
46	Ann Rosemary Kersten
47	Betty Kersten
48	Earl W. Kersten
49	William Kersten
50	Guy Q. King
51	Laura Kersten King
52	Eileen and Darwin Lambert
53	Thor Lane
54	Bob Langsenkamp
55	Mrs. A. N. Lundholm
56	Glenn C. Miller
57	Marta Porter
58	Richard H. Pough
59	Art C. Ruggles
60	Marjorie Sill
61	Denise Smith
62	Gayle Smith
63	J. R. Swanson
64	Mary Jeanne Terrazas
65	Steven Triaw
66	Ethyl W. Thorniley
67	Jeff van Ee
68	Terry Woodin
69	Charles C. Yoder

## TESTIMONIES

Federal Agencies

(None)

State and Local Agencies

- |   |                                |
|---|--------------------------------|
| 1 | Nevada Department of Minerals  |
| 2 | Nevada Division of State Lands |

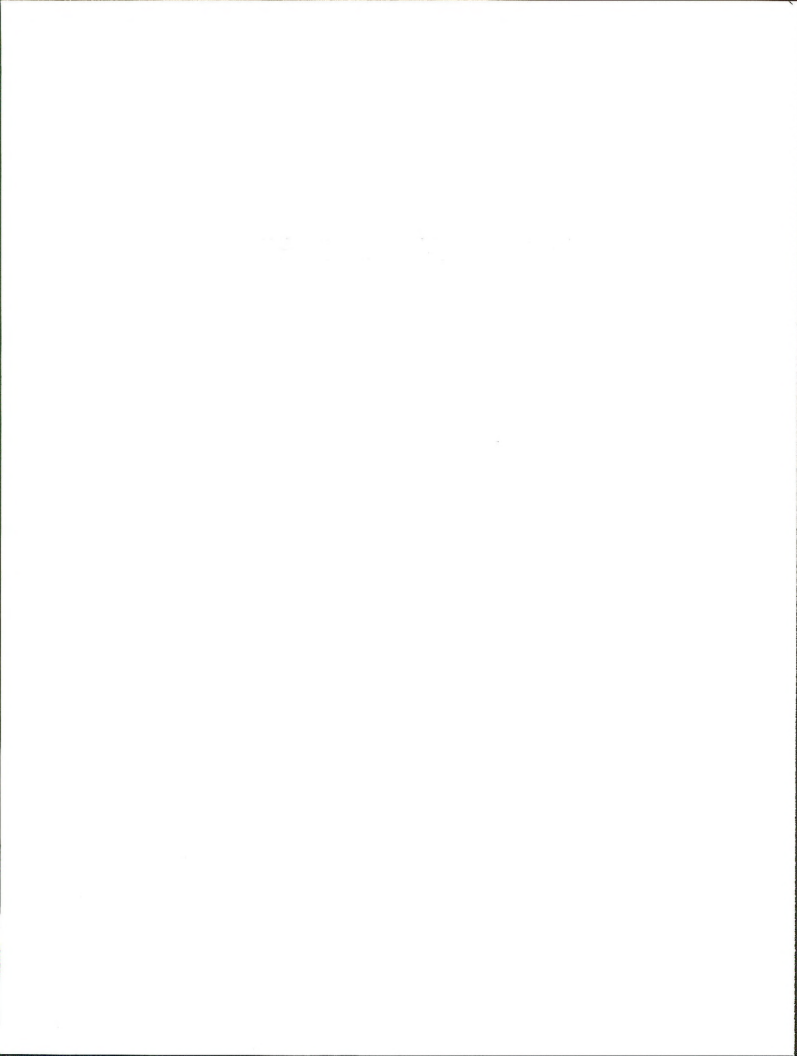
Organizations/Companies

- |   |                                       |
|---|---------------------------------------|
| 3 | Nevada Mining Association             |
| 4 | Nevada Outdoor Recreation Association |
| 5 | Sierra Club - Toiyabe Chapter         |
| 6 | Gold Prospectors Association          |

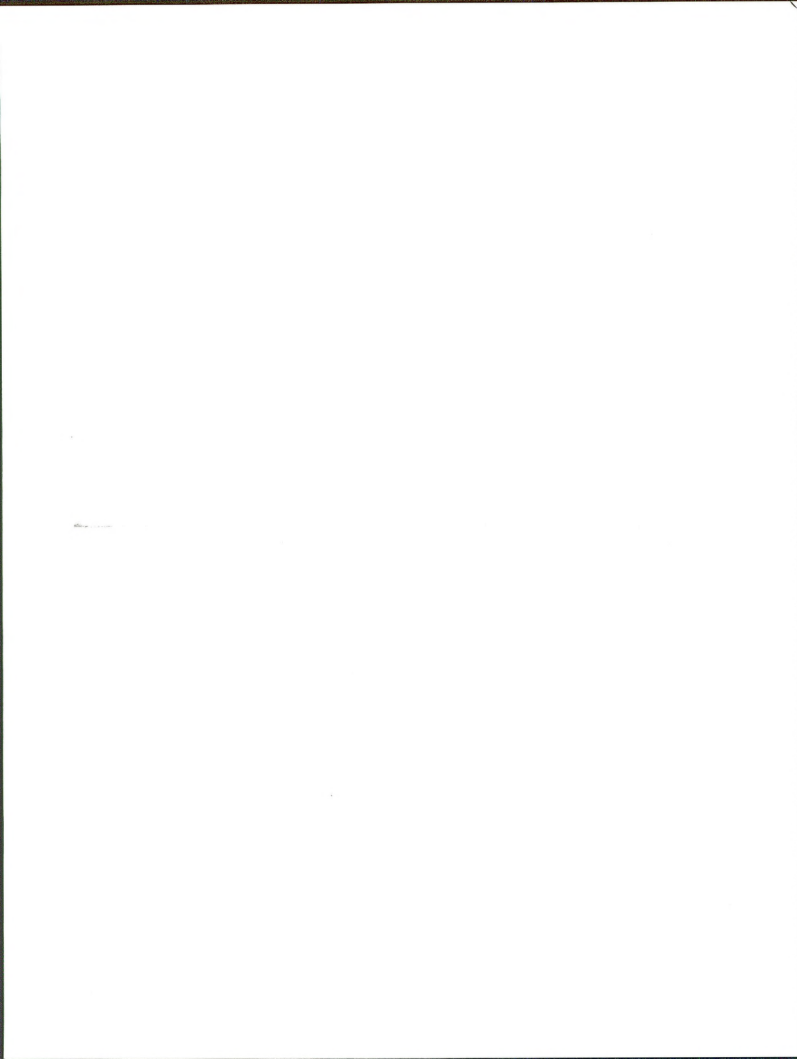
Individuals

- |    |                     |
|----|---------------------|
| 7  | Ray Arnold          |
| 8  | Elizabeth Brownsen  |
| 9  | Glenn Buchanan      |
| 10 | Gary Clark          |
| 11 | Larry Dwyer         |
| 12 | Jeff Conrad-Forrest |
| 13 | Bud Hendrix         |
| 14 | David Hornbeck      |
| 15 | Nina Keeney         |
| 16 | Gordon Lorsung      |
| 17 | Amy Mazza           |
| 18 | Glenn Miller        |
| 19 | Ross Smith          |
| 20 | Karen Tanner        |
| 21 | Terry Woodin        |





## COMMENT LETTERS



## COMMENT LETTER 1

UNITED STATES GOVERNMENT  
memorandum

DATE: December 17, 1986

REPLY TO  
ATTENTION: Superintendent, Eastern Nevada AgencySUBJECT: Draft Wilderness Environmental Impact Statements,  
Ely District Office, Bureau of Land ManagementTO: Kenneth G. Walker, District Manager  
Attention: Shaaron Metherton

Pursuant to your request for review and comment for the Draft Schell Wilderness EIS, Draft Egan Resource Management Plan/EIS, and the Egan Wilderness Technical Report, we offer "No Comment" at this time. We were concerned how this would affect some of the spiritual values and cultures and have contacted and consulted the Ely Indian Colony Council Staff for their review. In speaking with your Environmental Protection Office, we understand you are not receiving any more comments from the Tribe at this point; however, we do request that you invite any response if any, the Tribe might have.

If you have any questions or concerns, please feel free to contact James Vallie of our Realty Staff at telephone number (702) 738-5165.



OPTIONAL FORM NO. 10  
MAY 1962  
GSA FPMR (41 CFR) 101-11.6  
5010-104

U.S. GOVERNMENT PRINTING OFFICE: 1980 O - 285-268 (8021)

## COMMENT LETTER 2



United States Department of the Interior

BUREAU OF MINES  
WESTERN FIELD OPERATIONS CENTER  
EAST 900 100 AVENUE  
SPOKANE, WASHINGTON 99202

November 25, 1986

## Memorandum

TO: Kenneth G. Walker, District Manager--Ely District Office,  
Bureau of Land Management, Ely, Nevada

FROM: Supervisor--Minerals Involvement Section, Branch of Engineering  
Studies

SUBJECT: Draft Egan Resource Management Plan/EIS, Egan Wilderness Technical  
Report, and Draft Schell Wilderness EIS

Thank you for seeking assurance that we have reviewed the subject documents. Our records indicate we reviewed the documents in March 1984, but inadvertently failed to relay our comment to your office. The subject documents covered mineral resources very well, and a no comment response is given.



for  
D'Arcy P. Banister

## COMMENT LETTER 3



## United States Department of the Interior

BUREAU OF RECLAMATION  
MID-PACIFIC REGIONAL OFFICE  
2800 COTTAGE WAY  
SACRAMENTO, CALIFORNIA 95825-1898

IN REPLY  
REFER TO: MP-750  
120.1

DEC 9 - 1986

To: District Manager, Bureau of Land Management, Ely, Nevada  
From: Chief, Division of Planning and Technical Services, Bureau  
of Reclamation, Sacramento, California  
Subject: Review of Egan Wilderness Technical Report, Ely District,  
Ely Resource Area

We have reviewed your Egan Resource Area Wilderness Technical Report which discusses the criteria and quality standards for four WSAs within the Ely District. At this time, we do not have any specific comments regarding the technical aspects or the discussion of the alternatives in this report.

cc: Mid-Pacific Code 420

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## COMMENT LETTER 4



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
GREAT BASIN COMPLEX  
4600 Kietzke Lane, Bldg. C  
Reno, Nevada 89502

December 19, 1986

## Memorandum

To: District Manager  
Bureau of Land Management  
Ely, Nevada  
AFNE  
From: Complex Manager, Reno, Nevada  
Subject: Egan Draft Resource Management Plan and Environmental Impact  
Statement, Egan Wilderness Technical Report, and Scheff Resource  
Area Draft Wilderness Environmental Impact Statement

We are sorry to let you know that because of other commitments we cannot review and provide comments on the above subject document. We do, however, thank you for the opportunity to provide comments on these documents, and look forward to providing input on future Bureau of Land Management planning documents.

cc: Assistant Regional Director (AFNE), Portland, Oregon  
Dave Harmon, Bureau of Land Management, Reno, Nevada

## COMMENT LETTER 5



## United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 36063

SAN FRANCISCO, CALIFORNIA 94132

IN APPROPRIATE CASE

L7617 (WR-RPE)

December 1, 1983

## Memorandum

To: *Approved* District Manager, Bureau of Land Management, Ely, Nevada

From: Regional Director, Western Region

Subject: Egan Draft Resource Management Plan and Environmental Impact Statement (DES 81/63)

In response to your request, we have reviewed the subject document and have the following comments.

In Chapter 3, Affected Environment, the draft document totally fails to address cultural resources. Therefore, we believe that, in order to fulfill the requirements of NEPA and the National Historic Preservation Act and its implementing regulations, 36 CFR 800, the Bureau of Land Management should contact the State Historic Officer and develop a plan for (1) estimating possible archeological resources; (2) summarizing known values based on a review of State Archeological Site files as well as the Bureau of Land Management's State Office Archeological Site files; and (3) initiating archeological field reconnaissance studies in the project area if these have not already been started. At the same time, any future environmental documents prepared for this project area should indicate BLM's willingness and procedures for undertaking site specific surveys of all planned projects within the area, including maintenance bases, access roads, fence lines, springhead sodifications, etc., as agreed upon with the State Historic Preservation Officer.

At present, we are reviewing the Draft Environmental Statement for the White Pine Power Project (DES-83/71) which appears to involve portions of the Egan Resource Area. Consequently, we may have additional cultural resource comments pertinent to the Egan Area in our review response on the White Pine statement.

cc:  
WASO (792)  
IAS

## RESPONSE TO COMMENT LETTER 5

Response Number 1

This comment letter is addressing the entire Egan Resource Management Plan/EIS, not just the Wilderness portion. The following response to the National Park Service letter was published in the Final RMP/EIS.

During the issue identification phase in which the public was requested to submit their concerns, cultural resources did not surface as a major problem in the Egan Resource Area. Therefore, cultural resources were not considered a critical issue requiring specific management direction within the RMP/EIS. However, cultural resources is considered an important program and is still operating under normal administrative procedures as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA), the National Environmental Policy Act of 1969 (NEPA), and the National Historic Preservation Act of 1966. Chapter 3, the affected environment, has been expanded in this document to include more cultural information.

BLM's "willingness and procedures for undertaking site specific surveys of all planned projects within the area" has been addressed under Standard Operating Procedures Number 4 in Chapter 2 of this document. A cultural resources section has been added to the affected environment chapter and impacts chapter in this document.

In this document, the Final Egan Wilderness EIS, cultural resources were considered in Chapter 1, discussed and dropped as an issue from further evaluation.



## COMMENT LETTER 6



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 215 Fremont Street  
 San Francisco, Ca. 94105

Merrill L. DeSpain  
 District Manager  
 Bureau of Land Management  
 Star Route 5, Box 1  
 Ely, NV 89301

DEC 19 1983

Dear Mr. DeSpain:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled EGAN RESOURCE MANAGEMENT PLAN. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2 (lack of objections - more information needed). The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

*Charles W. Murray, Jr.*  
 Charles W. Murray, Jr.  
 Assistant Regional Administrator  
 for Policy, Technical and  
 Resources Management

Enclosure (1)

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## COMMENT LETTER 6

Water Quality Comments

1 The FEIS should provide a basis for the statement on page 91 that impacts to ground and surface water are not considered significant and will not be discussed further. The impacts from grazing to surface water can be significant due to erosion and sedimentation. Water quality and beneficial uses should be protected through effective implementation of the range management practices presented.

RESPONSE TO COMMENT LETTER 6

Response Number 1

The comment of page 91 referred to the entire RMP, not just the wilderness portion. This statement has been stricken in the Proposed Egan RMP/Final EIS, and a new analysis included in Chapters 3 and 4. The water quality issue was considered but dropped from further consideration in this document. Refer to the issues section in Chapter 1 for the rationale.

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COMMENT LETTER 7



United States  
Department of  
Agriculture

Forest  
Service

Intermountain  
Region

324-25th St.  
Ogden, UT 84401

Re: Mr.

Date DEC 15 1983

Mr. Merrill L. DeSpain  
Bureau of Land Management  
Ely District Ranger  
SR 5 Box 1  
Ely, NV 89301

Dear Mr. DeSpain:

The Intermountain Region Office and the Humboldt National Forest have completed a review of the Egan Draft Resource Management Plan and Environmental Impact Statement. We wish to commend your staff for the development of a quality document.

The Preferred Alternative appears to provide a balanced approach to resource management. The management of some area resources, however, require a greater coordination by our two agencies than is called for in the document. You may want to recognize these areas and provide specific direction for continued coordination efforts. The major areas requiring coordination are: Schell Creek Elk winter range, Duckwater Wildhorse Management Unit, the Riordan's Well wilderness study area, noxious weed control, and grazing allotments used in conjunction with National Forest lands.

We appreciate the opportunity to review and comment on your EIS.

RICHARD K. GRISWOLD  
Director, Planning and Budget

RESPONSE TO COMMENT LETTER 7

Response Number 1

Thank you for your comments. BLM will continue to work closely with the Forest Service in management of the Riordan's Well Wilderness Study Area.

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COMMENT LETTER 8



THE STATE OF NEVADA  
EXECUTIVE CHAMBER

Carson City, Nevada 89710

January 9, 1984

RICHARD H. KEAN  
Governor

TELEPHONE  
(702) 688-5470

Merrill L. DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

Thank you for providing the Draft Egan Resource Management Plan and Environmental Impact Statement for our comment. The Resource Management Plan deals with a variety of issues and uses relating to the Bureau of Land Management lands within the resource area; however, at this time, this comment is specifically on the wilderness study areas considered in the document.

You should have already received comments from various state agencies representing their specific concerns with each area. I hope you find these informative and useful. Because the various state agencies are given different mandates and have different concerns, their evaluations and comments may understandably vary.

I have asked the various state agencies to work with my office to develop a consensus position for the wilderness study areas in the Egan Resource Area. These agencies were the State Department of Agriculture, Conservation and Natural Resources, Minerals and Wildlife. The State's position is based upon information provided by the Bureau of Land Management, the State's knowledge of the resources and attributes of each area, and concerns presented by the general public.

1 Park Range (NV-040-143) - This is a very scenic area having outstanding primitive recreation opportunities and wilderness qualities. The area is isolated and has very few resource conflicts apparent at this time. I concur with the Preferred Alternative which proposes the area to be continued to be considered for wilderness designation.

## COMMENT LETTER 8

2 Riordan's Well (NV-040-166) - The wilderness values in this area do not seem to be substantial or of special significance. Portions of the area are isolated and do have scenic value; however, many roads extending into the area compromise the solitude that may be found. Mineral values are noted within the area. This area should not be further considered as a potential wilderness area.

1 South Egan Range (NV-040-168) - This area does have some limited portions which can be considered to have high wilderness qualities; however, the values of these limited areas are outweighed by the mineral potential and other resource values found throughout the range. Numerous roads and ways further detract from the limited wilderness characteristics present. I concur with the preferred alternative which proposes the area to be not further considered for wilderness designation.

3 Goshute Canyon (NV-040-015) - Much of the study area does have wilderness qualities worthy of further consideration of wilderness designation. The highest wilderness qualities are found in the northern portion of the area and within the area presently designated as a natural area. The portion of the study area south of the natural area contains high mineral values and should remain open to mineral exploration and development. I support continued wilderness consideration for the area included in, and north of, the area now designated as a natural area.

The State appreciates the opportunity to comment on your study. We urge you to consider carefully the concerns of the State and the local units of government in your continued review.

Sincerely,

  
RICHARD H. BAYAN  
Governor

RHS/sc

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## RESPONSE TO COMMENT LETTER 8

Response Number 1

Your support for the Preferred Alternatives from the Draft EIS for the Park Range and the South Egan Range WSAs has been noted.

Response Number 2

The wilderness values for the area are documented in Chapter 3. Most of the unit, including its large core of mountainous terrain is untouched by man-made intrusions. At the lower elevations of the suitable portion, 5 two-track roads and ways are present, that are very primitive and are well accreted by piñon and juniper. These are cherry-steamed out of the suitable area in accordance with BLM policy and practice, and thus results available for use. Their presence does not affect the naturalness or solitude of the suitable portion of the WSA.

Based on geologic inference, potential was estimated to be low for accumulation of metallic mineral resources, with one exception in the west where contact metamorphism may have occurred in about 3,000 acres. The 37,542 acre area recommended as suitable will have an intensive mineral inventory conducted by the USGS/BLM to determine the area's mineral potential.

Response Number 3

The Goshute Canyon WSA has outstanding opportunities for both recreation and solitude. These opportunities discussed in Chapter 3 are many and diverse and are distributed uniformly throughout the WSA. The mountains are rugged throughout, although the highest elevations occur to the south. Goshute Canyon in the northern half offers great recreation opportunities and a chance to penetrate deeply into the mountains, but so do two major canyons to the south, Currie Canyon and Log Canyon. Vegetation and wildlife are very similar in the type and numbers along the entire length of the range.

Special features enhance the outstanding opportunities found within the unit. These special features include one of the Elly Barrier's largest regenerating stands of bristlecone pine. The trees occur to the central high country mostly south of Goshute Creek and along the ridgelines. Other special features include the highly decorated Goshute Cave, archaeological values, diverse wildlife and spectacular scenery.

The quality of minerals information for the area varies greatly. In the southern tip of the area near where mining has occurred since the late 1800's, the information is good, and mineral potential appears to be high. This zone of potential is excluded from the suitable portion.

The northern half of the WSA is rated as having low potential because of the lack of prospects, claims, or evidence of mineralization, and because of the lack of complex geology. It falls within the suitable portion.

Between the high potential in the south and the low potential in the north is an area rated as having moderate mineral potential. About half of this zone lies within the area recommended suitable for wilderness in the draft RMP. The estimation of moderate mineral potential is based primarily upon the proximity of the area to active mining in the south and the structural complexity of the geology. To help substantiate what at this point are mere suspicions, the BLM, as required by the Federal Land Policy and Management Act, has arranged for the U.S. Geological Survey and Bureau of Mines to extensively survey the area to more accurately assess the mineral potential.

## COMMENT LETTER 9

STATE BOARD OF AGRICULTURE  
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STATE OF NEVADA  
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350 CAPITOL HILL AVENUE, RENO, NEVADA 89502  
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 DIVISION OF RANGE MANAGEMENT

November 30, 1983

Office of Community Services  
 1100 E. Williams, Suite 109  
 Carson City, NV 89710

SAI # 84300018 - Egan Wilderness Technical Report/Egan Draft RMP/EIS

We appreciate the opportunity to comment on the Draft Egan Resource Management Plan and Environmental Impact Statement and the Egan Wilderness Technical Report. The Nevada Department of Agriculture comments and recommendations are as follows:

The proposed RMP for the Egan Resource Area is a long-term proposition. Over the 20-year span envisioned in the plan, many changes will occur in BLM personnel, ranch ownership and management, local needs, local economy, national emphasis and priorities, etc. It is our recommendation that a Stewardship Committee be established to provide long range objectivity, direction, continuity, stability, flexibility, and local acceptance to resource management in the Egan Resource Area.

Corridors: Designate reasonable width transportation and utility corridors along existing rights-of-way. Require use of these corridors for future developments wherever feasible. Livestock grazing and Desert Land Entry should be allowed in the corridors where feasible.

Wilderness: Implement Alternative "A" with respect to wilderness area action.

Livestock Grazing: The three year average use levels in every management zone within the proposed resource area are well below the preference levels indicating the concern of the livestock operator to protect the range resource. Top priority should be given to range improvement to increase usable livestock forage. Monitoring must be of the highest quality to guarantee maximum efficient use of available forage while at the same time ensuring range improvement. AM's should be adjusted regularly to reflect range conditions. To limit grazing to the three year average for an undetermined period of time may not provide for efficient forage use.

## COMMENT LETTER 9

Community Services  
 Page 2  
 November 30, 1983  
 SAI #84300018

Review the categorization procedure described in the document and after consultation with the livestock operators, re-categorize the allotments, placing greater emphasis on range condition, trend and productive potential and on the desires of the livestock operators.

Develop grazing plans for those allotments where extensive improvements and/or grazing systems are needed and practical, and where the livestock operators are willing to participate.

Wild Horses: Reduce and maintain horse numbers to 1971. Do not allow horses to extend into areas where they did not exist prior to 1971.

Wildlife: Wildlife should be maintained and protected without adversely affecting the livestock interests.

Selective Management (M-I-C): It is our experience that no allotment is totally uniform and so it is a matter of judgement when they are placed in the different M, I, and C categories. It is recognized that there is room for improvements on every allotment. Therefore, we recommend that placement of allotments in one of the categories should not be inflexible. Where the livestock operator objects or wishes to have it in a different category, his reasonable desire should be allowed.

Sincerely,

THOMAS W. BALLOW  
 Executive Director

TWB:L

## COMMENT LETTER 9

NEVADA BUREAU OF MINES AND GEOLOGY  
 MACKAY SCHOOL OF MINES  
 UNIVERSITY OF NEVADA-RENO  
 RENO, NEVADA 89567-0088

(702) 784-6681

13 December 1983

EGAN DRAFT RMP/EIS, EGAN WILDERNESS TECHNICAL REPORT

As described within the preferred alternative management plan, boundary of the Goshute wilderness study area includes an area with inferred high mineral potential along the north and eastern margins of Paris Canyon. There is considerable claim staking activity here, and there may be potential for the discovery of disseminated gold deposits in this area. Rocks outcropping along the upper reaches of Paris Canyon include the Mississippian Chathamian Shale and Jones Limestone. This group of rocks forms the host horizon for the disseminated gold deposit at Alligator Ridge in the southern Ruby Range to the west. Pennsylvanian-Permian rocks on the northwest side of Paris Canyon contain one of the few coal deposits in the State of Nevada. Old workings on the coal seam indicate that some coal has been mined here.

*J. W. Tompkins*

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## COMMENT LETTER 9

STATE OF NEVADA

ROBERT D. WENGERLARD

Nevada Historic Preservation Officer



## DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

DIVISION OF HISTORIC PRESERVATION AND ARCHIOLOGY

201 S. 3rd Street  
 Capitol Complex  
 Carson City, Nevada 89710  
 (702) 885-1130

December 8, 1983

## M E M O R A N D U M

TO: John Walker, Office of Community Services

FROM: Alice M. Becker, Staff Archeologist *Alice M. Becker*

SUBJECT: EGAN DRAFT RMP/EIS, SAI NVF8430018

The Division participated with other state agencies in commenting on the BLM's proposed wilderness designations for the Egan Resource Area. Our comments in general are included with those to be submitted by the state of Nevada. However, we would also like to communicate our concern for cultural resources in several areas.

3 First, there is a need for further investigation of archeological sites associated with the pristine mountain meadows in the Park Range. Although these sites will receive added protection from wilderness designation, we feel they merit study for a more complete understanding of regional pre-history.

4 In regards to the South Egan Range, numerous archeological sites have been located. Because the area was not recommended for wilderness designation, some form of additional protection may be necessary if development accelerates in the near future.

The Resource Management Plan/EIS does not adequately describe cultural resources in the chapter on affected environment. In accordance with the Rangeland PMA between the BLM and the Advisory Council dated January 14, 1980 reference must be made of existing Class I and II Inventory reports identifying historic and cultural properties. This information should be included in the final RMP/EIS.

If there are any questions regarding these comments, BLM staff is encouraged to contact us.

AMB/law



RICHARD H. BEYAR  
Governor

STATE OF NEVADA



## DEPARTMENT OF MINERALS

400 W. King Street, Suite 100  
Carson City, Nevada 89701  
(702) 885-5050

December 7, 1983

Mr. Merrill L. DeSpain  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

The Nevada Department of Minerals appreciates the opportunity to review and comment on the Draft Egan Resource Management Plan and Environmental Impact Statement (SAI NV # 843D0010). Our agency is particularly interested in issues associated with minerals and energy development, since related decisions could have long lasting effects on the mineral industry in the State.

The Nevada Department of Minerals has several concerns relative to the Egan Resource Management Plan and Environmental Impact Statement. Of primary concern is the proposal to close several sections of land in which there currently is or has been mining or exploration activity. Many of these areas also have favorable potential for geothermal development and include sections of lands currently under oil and gas leases. The department is also concerned about the designated mineral potential as stated in the draft document. We feel that the rating system to evaluate mineral potential is inaccurate and biased since a high rating only recognizes past mineral activities. We believe that an area's true mineral potential can never be fully known until actual mining and exploration occurs. In many cases, major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seems to have little or no mineral potential into a prime exploration target.

The Department recommends that wilderness study areas should only be considered if an area has no mineral resource potential; that is, areas with sufficient geologic data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

Page Two  
December 7, 1983  
Egan Wilderness Comments

Furthermore, the department feels that if any area with favorable mineral potential is to be recommended for wilderness, it should only be because: 1) There are no alternate sites with no mineral potential, or 2) An intensive U. S. Geologic Survey or U. S. Bureau of Mines study has been conducted at a sufficient level of detail to reclassify the area as having no resource potential.

Generally, the department found the draft document to be well written and easy to understand. Your staff should be complimented on these efforts concerning both data collection and compilation.

For clarification purposes, please find listed below our specific comments on each of the four Wilderness Study Areas identified in the Egan Resource Area.

7 Park Range-The moderate geothermal potential on both the western and eastern edge of the MSA along with the possibilities of favorable metallic mineral resources presents resource conflicts that the department feels outweighs the wilderness value in the area. Therefore, the department recommends that the entire area not be considered for wilderness since all alternatives, except no wilderness, would have a significant adverse impact on mineral and energy development in the area.

8 Bixidan's Wells-The Nevada Department of Minerals recommends that the entire area not be considered for wilderness due to the numerous oil and gas leases in the area along with moderate mineral potential in the southern half of the MSA. The numerous mining claims in the central sections of the MSA indicates that favorable mineral potential may occur in areas not designated in the draft document. The Troy mining district, which is located southeast of the MSA was very active during past years with recorded production of gold valued at approximately 1 million dollars. The Terrell Mine, which produced tungsten, is located just outside the southern edge of the MSA. The department feels that all alternatives, except no wilderness, would have a significant adverse impact on mineral and energy development in the area.

9 South Egan Range-The Nevada Department of Minerals supports the preferred alternative for this Wilderness Study Area.

10 Goshute Canyon-The Nevada Department of Minerals strongly recommends that the entire area not be considered for wilderness due primarily to excellent mineral potential and consequent resource conflicts which exist in the area. The Goshute Canyon MSA is very close to the historic mining town of Cherry Creek. The Cherry Creek mining district, which recorded millions of dollars in production, extends into the MSA. Minerals produced in the Cherry Creek mining district include gold, silver, lead, copper and tungsten. Nevada's only known coal deposits are located in Paris Canyon on the western edge of the MSA. The coal deposits, only a few feet thick in many areas, have been of interest to the mineral industry for many years.

## COMMENT LETTER 9

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December 7, 1983  
Egan Wilderness Comments

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Goshute Canon (cont.) - Paleozoic sedimentary rocks cropping out in the center of the USA are the same formation type as the host rock which is currently being mined for gold and silver at the Alligator Ridge Mine. The Jasperoid rocks located in the center of the USA are of extreme interest to the mineral industry since Jasperoids are a target material for Carlin-type gold deposits. The department feels that all alternatives, except no wilderness and wilderness de-emphasis, would have a significant adverse impact on mineral and energy development in the area.

As a closing statement, the Department of Minerals does value preserving some public lands for future generations and scientific study, as long as the mineral industry, which is so essential to our national defense and the State's progressive economy, can remain healthy and be provided the opportunity to pursue new mineral resources.

Sincerely,

  
Paul Iverson  
Deputy Director

P1/kc

cc: Edward F. Spang, State Director  
Linda Ryan, Office of Community Services, State Clearinghouse Program

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## COMMENT LETTER 9

Division of State Lands  
State Land Office  
State Land Use Planning Agency  
(502) 487-6642



Address Reply to  
Division of State Lands  
208 S. Fall Street  
Carlin, Nevada  
Carlin City, Nevada 89718

STATE OF NEVADA  
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

## Division of State Lands

December 15, 1983

Merrill L. DeSpain  
District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

SUBJECT: Comments on Egan Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. DeSpain:

After reviewing the Egan Draft Resource Management Plan and Environmental Impact Statement and attending all the public hearings held regarding the plan and EIS, we would like to offer the following comments:

1. The three year average licensed use of 121,461 AUM's for livestock grazing levels is considerably lower than 216,348 AUM active grazing preference for the entire area. It is generally agreed that since the three year average licensed use represents actual livestock use in the area, little adverse impact would be noted for most of the livestock operators in the area. Our concern is with the livestock operators whose three year average use is lower than a reasonable stocking rate for their allotment. These reduced numbers may have occurred for a variety of reasons, some not related to forage conditions. We would recommend that the three year licensed use be used as a general guide in establishing stocking rates on which monitoring will be based. For those livestock operators who have been running less livestock in the past three years for reasons unrelated to forage availability, we suggest that BLM work with this limited number of operators to establish a stocking rate which would be more equitable. This would avoid unfairly penalizing a few operators who happened to have had herd levels less than what they reasonably could have had during the past three years. We recognize that a proper monitoring program should allow for upward adjustments for these operators; however, these adjustments under the process proposed, will not be implemented until after monitoring is well underway. This will still unfairly penalize some of the operators who have reduced herd levels.

The actual implementation of fair stocking rates to be used as a basis for monitoring could be established through a coordinated resource management planning process, if all participants are agreeable to using the process.

## COMMENT LETTER 9

Merrill DeSpain  
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Page 2

2. We question how a significant increase in wild horses (page 99 under the preferred alternative) will be a beneficial impact. Wild horse numbers are far too high in many areas of the State, including the Egan Resource Area, and considerable effort and money is being expended in trying to reduce these already high wild horse populations. A proposal to reduce wild horse levels, perhaps to 1871 levels, should be proposed in the preferred alternative, instead of retaining the unreasonably high population levels now found in the area.
3. The Plan and EIS fail to address the possible impacts that may occur if the White Pine Power Project is implemented. The preferred site for the power plant is in Steptoe Valley north of Ely. If this plant is constructed, it will have impacts on the Goshute Canyon WSA, land disposal proposals, potential irrigated agricultural land entries in Steptoe Valley, loss of ANM's for livestock, wild horses, and wildlife, recreation and utility corridors. We suggest that these potential impacts be addressed in the plan and EIS.
4. For wilderness study areas included in the planning area, we offer the following evaluations and recommendations:

- A. Park Range (NV-040-143) - We concur with the preferred alternative which proposes the Park Range be further considered as a potential wilderness area. The WSA is a very natural area which has excellent wilderness values. These values, coupled with the fact that few resource conflicts are evident and the area appears to be manageable as a wilderness, make this area worthy of further wilderness consideration.
- B. Bjordan's Well (NV-040-166) - The area should be dropped from further consideration as a wilderness area. Some portions of the area have potential mineral resource conflicts and other portions are adversely impacted by many ways and cherry-stem roads. The area, also, lacks significant wilderness qualities and opportunities for solitude and primitive recreation experiences.
- C. South Egan Range (NV-040-168) - The area should not be further considered for wilderness designation. Portions of the area do contain outstanding wilderness characteristics; however, much of the area is adversely affected by the intrusions of man through cherry-stem roads and numerous ways which nearly divide the area into many small segments. Resource conflicts, primarily mineral potential, are significant throughout the study area. The many multiple use benefits that can be realized from the area outweigh its potential as a wilderness area.
- D. Goshute Canyon (NV-040-015) - The area contains high wilderness values and unique features which seem to qualify some of the area for further wilderness consideration. The best areas for wilderness are located in the northerly portion of the WSA. We support continued consideration for wilderness for the area north of the southerly boundary of the designated natural area. The portion of the WSA south of this line contains high mineral values and should remain open to mineral exploration and development. We are concerned, however, that the proposed power plant, with its preferred site close to the WSA, could adversely affect the wilderness values, and vice-versa, the proximity of the WSA could adversely influence the power plant proposal.

## COMMENT LETTER 9

Merrill DeSpain  
December 15, 1983  
Page 3

5. On a small matter that appears to be an oversight, we note on the preferred alternative map (no page or map number) that a proposed utility corridor is shown extending northeast from Carrant to the National Forest boundary. This corridor does not seem to exit the National Forest as it should. We suggest that the map be corrected to show the corridor east of the National Forest.
6. The DEIS for the White Pine Power Project indicates that approximately 2250 acres of public land would go out of public ownership if the plant is constructed, irrespective of the site. On page 100, Table 4-1 should be amended to reflect this possibility under the alternatives presented.
7. Under Alternative D, on Table 4-1 (page 100) 7,855 acres are indicated for possible disposal for "Grass Seeding (Dryland)," a figure considerably higher than that which is proposed for any of the other alternatives. Discussion of this type of disposal was not found in the EIS. We suggest that this type of disposal be more fully explained. Included in the discussion should be an explanation of why 7,855 acres is appropriate for this alternative and only 713 or 813 acres are considered for disposal for this class in the other alternatives.

We thank you for the opportunity to participate in the planning for the Egan Resource Area and hope our comments and suggestions are useful to you.

Sincerely,

Pamela B. Wilcox  
Administrator

PBW:JMD/jc

## COMMENT LETTER 9

STATE OF NEVADA  
DEPARTMENT OF WILDLIFE1100 Valley Road  
P.O. Box 10678  
Reno, Nevada 89520-0022  
(702) 789-0500RICHARD H. BRYAN  
GovernorWILLIAM A. MOLINE  
Director

December 13, 1983

Ms. Linda Ryan, Director  
Office of Community Services  
1100 East William, Suite 109  
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and provide comments on the Egan Wilderness Technical Report which was prepared by the Ely District of the Bureau of Land Management (SAI NVF84 300018). Our agency provided some input directly to the BLM on those issues in the form of a completed questionnaire in 1980. Our comments relative to the specific areas in question are as follows:

**Park Range** - We support the designation of the Park Range as a wilderness area as a means of protecting existing resource values. This remote tract of land has few inroads and is important transitional and wintering habitat for mule deer.

**Jordan's Well** - Our agency supported wilderness consideration for this area in 1980 with mention that numerous roadways were present in the canyon bottoms and along the alluvial fans. We continue to support wilderness for such of the area as a protective measure for the natural resources but believe that existing access roads should continue to be maintained. Hunter access to the canyon areas is important because of the use of the area as a deer winter range.

**South Egan Range** - We did not support wilderness consideration for this area since it appears to lack significant natural features. Numerous roads also proliferate the area.

**Coshute Canyon** - We did not believe that this area provided significant wilderness characteristics because of past development projects within and adjacent to the area. The naturalness and associated opportunities for solitude appear to be limited.

I hope the above comments will be of value to the Bureau of Land Management in making a final determination as to the wilderness values within the Egan Resource Area. If you have any questions on the above or feel a need for further input at this time, please advise.

Sincerely,

Jim Wessner  
Acting DirectorRPM:cb  
cc: Region II

## COMMENT LETTER 9

RICHARD BRYAN  
GovernorDIVISION  
OF  
STATE  
PARKS  
JOHN RICHARDSON  
District Manager  
Star Route 5, Box 1  
Ely, Nevada 89301

October 21, 1983

Merrill L. DeSpain  
District Manager  
Star Route 5, Box 1  
Ely, Nevada 89301

In Reply Refer to

Dear Merrill,

We have reviewed the Egan Draft of the Resource Management and the Environmental Impact Statement.

We feel that a modified version of the Bureau's Preferred Alternative would be beneficial to the recreational interests of the State of Nevada.

We suggest that the South Egan Range not be dropped from Wilderness Designation. Instead we feel that a compromise can be made by modifying the acreage to eliminate part of the conflicts, while protecting the most significant natural, geological, and biological aspects within the South Egan Range.

If the South Egan Range can not be included in the Preferred Alternative, we would support Alternative B.

I would be happy to meet with you to discuss our concerns and recommendations.

Sincerely,

John Richardson  
Administrator

JR:km

Administrative Fee: \$4.00  
 District or Field Office: (702) 789-1100  
 Statewide Management: (702) 789-1100

A Division of the Department of Conservation and Natural Resources  
 Roland D. Westergaard, Director

4-11

## RESPONSE TO COMMENT LETTER 9

### Response Number 1

Your preference for the No Wilderness Alternative has been noted.

### Response Number 2

Thank you for your information on the Goshute Canyon WSA.

### Response Number 3

A study of several archaeological sites associated with the Park Range WSA meadows is currently underway.

### Response Number 4

In the case of any development which may affect archaeological sites in the South Egan Range WSA, impacts would be analyzed and mitigated as outlined under the Standard Operating Procedures in the Egan BLM. Refer to Chapter 1, Impact Topic 6 under Issues Identified but dropped, in this document.

### Response Number 5

The definition for high mineral potential used by the Great Basin GEM Joint Venture, an independent group contracted by the BLM to rate potentials in Nevada USA's, reads as follows:

The geologic environment, the inferred geologic processes, the reported mineral occurrences, and the known mines or deposits indicate high favorability for accumulation of mineral resources.

This definition allows for a high rating in previously unmined areas. The findings of the GEM Joint Venture were accepted by the BLM largely without change, so that the above definition of high potential supersedes the one listed in the Egan Wilderness Technical Report. All areas found by the GEM Joint Venture to have high mineral potential are shown on maps and reported in the text of this document.

### Response Number 6

Although nonimpairing geochemical and geophysical studies can be conducted to assess mineral potentials, in order to determine that an area has no mineral resource potential, its naturalness and other values would have to be adversely affected by extensive exploration. To do so in the search for suitable wilderness areas could paradoxically destroy the resource that is being considered for protection. This, of course, would thwart the original interest of Congress when it established the National Wilderness Preservation System. Furthermore, the Congress did not indicate any intent to prohibit designation of areas with mineral potential. Instead, it mandated an extensive mineral survey for all areas prior to designation so that a reasoned and knowledgeable balancing of values could be conducted. Where it appears that wilderness values outweigh mineral (and other competing resources) values based upon the best available information, then wilderness designation is indicated. No single resource will always have priority in these management recommendations.

### Response Number 7

The GEM inventory identified the entire Park Range WSA as having low potential for metallic minerals. Moderate geothermal potential was identified, but because of the numerous other areas with better potential located outside of the WSA, development was not considered likely.

## RESPONSE TO COMMENT LETTER 9

### Response Number 8

The presence of oil and gas leases does not indicate potential for these resources. The GEM inventory identified the entire WSA as having low potential for energy and minerals. A more complete survey will be undertaken by the USGS/BM to identify potential mineral resources.

### Response Number 9

Your support for the Preferred Alternative has been noted.

### Response Number 10

The area of high mineral potential in the southern portion of the WSA is well documented and was not included in the Proposed Action for the Goshute Canyon WSA. The potential for the remainder of the WSA is less well known. The USGS/BM will be providing more detailed mineral information on this area in their final mineral report.

### Response Number 11

Impacts resulting from the construction of the White Pine Power Project (WPPP) were addressed in the EIS prepared specifically for the WPPP.

### Response Number 12

Your support of the Preferred Alternatives for the Park Range and South Egan Range WSAs has been noted.

### Response Number 13

The wilderness values for the area are documented in Chapter 3. Most of the unit, including its large core of mountainous terrain is untouched by man-made intrusions. At the lower elevations of the suitable portion, 5 two-track roads and ways are present that are very primitive and are well screened by piñon and juniper. These are cherrystemmed out of the suitable area in accordance with BLM policy and practice, and thus remain available for use. Their presence does not affect the naturalness or solitude of the suitable portion of the WSA.

Based on geologic inference, potential was estimated to be low for accumulation of metallic mineral resources, with one exception in the west where contact metamorphism may have occurred in about 3,000 acres. The 37,542 acre area recommended as suitable will have an intensive mineral inventory conducted by the USGS/BM to determine the area's mineral potential.

### Response Number 14

The Goshute Canyon WSA has outstanding opportunities for both recreation and solitude. These opportunities discussed in Chapter 3 are many and diverse and are distributed uniformly throughout the WSA. The mountains are rugged throughout, although the highest elevations occur in the south. Goshute Canyon in the northern half offers great recreation opportunities and a chance to penetrate deeply into the mountains, but so do two major canyons to the south, Currie Canyon and Log Canyon. Vegetation and wildlife are very similar in the type and numbers along the entire length of the range.

Special features enhance the outstanding opportunities found within the unit. These special features include one of the Ely District's largest regenerating stands of bristlecone pine. The trees occur in the central high country mostly south of Goshute Creek and along the ridgelines. Other special features include the highly decorated Goshute Cave, archaeological values, diverse wildlife and spectacular scenery.

NO  
→  
NO

RESPONSE TO COMMENT LETTER 9

The quality of mineral information for the area varies greatly. In the southern tip of the area near where mining has occurred since the late 1800's, the information is good, and mineral potential appears to be high. This zone of potential is excluded from the suitable portions.

The northern half of the WSA is rated as having low potential because of the lack of prospects, claims, or evidences of mineralization, and because of the lack of complex geology. It falls within the suitable portions.

Between the high potential to the south and the low potential in the north is an area rated as having moderate mineral potential. About half of this zone lies within the area recommended suitable for wilderness in the draft RMP. The estimation of moderate mineral potential is based primarily upon the proximity of the area to active mining in the south and the structural complexity of the geology. To help substantiate what at this point are more speculative, the BLM, as required by the Federal Land Policy and Management Act, has arranged for the U.S. Geological Survey and Bureau of Mines to extensively survey the area to more accurately assess the mineral potential.

Response Number 15

The proximity of the proposed MPPP to the Goshute Canyon WSA would not affect the proposed project. Impacts to the WSA, should the MPPP be constructed, have been addressed in the EIS prepared specifically for the MPPP.

Response Number 16

Your support for the Preferred Alternatives for the Park Range, the South Egan Range, and the Riordan's Well WSA's has been noted.

Response Number 17

Your support of wilderness for the South Egan Range WSA has been noted, as well as your support for the preferred alternative for the other WSA's.

COMMENT LETTER 10

Brent Eldridge, Chairman  
 J. Kenneth Jones, M.D., Vice Chairman  
 Arthur Robinson, Member  
 Jay Hornrod, Member  
 Wayne Cameron, Member

P.O. Box 1502  
 (702) 289-8841

Board of County Commissioners

WHITE PINE COUNTY  
 ELY, NEVADA 89301  
 December 21, 1983

Mr. Merrill Despain, District Manager  
 Ely District Bureau of Land Management  
 Star Route 5, Box 1  
 Ely, Nevada 89301

*Merrill*  
 Dear Mr. Despain:

Our Board has reviewed the Draft Egan RMP and EIS and offers the following comments.

We note a letter to you from Mr. Eldon Cotton, Project Manager for White Pine Power Project, dated November 10, 1983, which points out the potential impacts to that project should various alternatives in the RMP be chosen. We favor the preferred alternative, but with the following reservations:

1. That Mr. Cotton's concerns are satisfied, assuring reasonable clearance for White Pine Power Project. Both the Egan and White Pine Power Project DEIS's should agree upon the alternatives for utility corridors and construction sites, and should also address the impact of wilderness designation upon air quality in general upon White Pine Power Project operation in particular.
2. That wilderness designation for Goshute Creek area not be recommended. Our Board has submitted a resolution previously which opposes wilderness designation anywhere in White Pine County because of its potential for adversely affecting our fragile economy. A Goshute Creek wilderness area could, we fear, spell the demise of White Pine Power Project at the preferred North Steptoe site. It could also impact likewise any other emitting industry which might settle in Steptoe Valley, as well as mining and agriculture.

Your approach to planning for the Egan R. A. is appreciated, and we feel that the monitoring program you propose for measuring the effects of forage utilization is good. Except as noted above, we support your preferred alternative.

We thank you and your staff for the presentations given us and for your other efforts to keep us informed.

Sincerely,  
  
 BRENT ELDRIDGE  
 Chairman

BE/cw



Response Number 1

Impacts resulting from the construction of the White Pine Power Project (WPPP) are addressed in the EIS prepared specifically for the WPPP.

Response Number 2

The BLM's Wilderness Management Policy states, regarding wilderness areas, that:

"When activities on adjacent lands are proposed, the specific impacts of [sic] those activities upon the wilderness resource and upon public use of the wilderness area will be addressed in environmental assessments or environmental impact statements, as appropriate. Mitigation of impacts from outside wilderness will not be so restrictive as to preclude or seriously impede such activities. (II. 8.9.)"

The same document also states the BLM's position on air quality in wilderness areas:

"Under the Clean Air Act (as amended, 1977), BLM-administered lands were given Class II air quality classification, which allows moderate deterioration associated with moderate, well-controlled industrial and population growth. The BLM will manage designated wilderness areas as Class II unless they are reclassified by the State as a result of the procedures prescribed in the Clean Air Act (as amended, 1977)."

According to the Clean Air Act, air quality reclassification is the prerogative of the State. The State must follow a process mandated by the Clean Air Act Amendments of 1977, involving a study of health, environmental, economic, social, and energy effects, a public hearing, and a report to the Environmental Protection Agency. (III.G.)

With these guidelines, wilderness designation would not endanger the White Pine Power Project to any way.

## REGIONAL PLANNING COMMISSION

of White Pine County

PHONE 289-3261

CITY HALL, ELY, NEVADA 89301

P. O. BOX 822

December 21, 1983

Mr. Merrill L. DeSpain  
Ely District Manager  
Bureau of Land Management,  
Star Route 5, Box 1  
Ely, Nevada 89301

RE: Egan Draft Resource  
Management Plan and  
Egan Wilderness Technical  
Report

Dear Mr. DeSpain:

The Regional Planning Commission of White Pine County has read and discussed the above documents. A meeting of the Regional Planning Commission was held December 15, 1983. Concerns were expressed by board members on the following items:

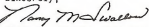
1. Seven members of the eight who were present felt that wilderness designation of any kind in White Pine County would endanger and perhaps eliminate the White Pine Power Project. These members opposed wilderness if elimination of the Power Project was the result.
2. Reference was made to the depressed economy in White Pine County. Concerns were expressed by six board members that wilderness designation of any kind would preclude exploration for oil and gas and minerals, etc. A statement was made that a great deal of the State of Nevada is already under Federal control and jurisdiction. It was felt by the board that existing laws and regulations afford adequate protection for undesignated wilderness, scenic and primitive areas under present multiple use practices. It was felt that range management practices as they are presently being followed should be continued. Multiple use in a literal sense should be allowed. Further regulation of the public lands was opposed by six of the eight members present.

**COMMENT LETTER 11**

We have ten members on the RPC Board. One member, Vice Chairman Joyce Haszew, was unable to attend but submitted written comments, which were read into the minutes of the meeting. Six members voted to oppose any wilderness designations in or near White Pine County; one member favored wilderness use, however was opposed to any designation which would endanger the White Pine Power Project. The eighth member abstained from comment for he is employed by the Bureau of Land Management.

I personally contacted Ron Deale of the Employment Security Department and was informed that the November unemployment rate is 15.6% for White Pine County. In my opinion this does not represent a true picture of unemployment in White Pine County. There are many discouraged workers who have quit looking or who have moved from the area. Any wilderness designation will tend to limit potential economic development essential to the welfare of White Pine County Residents.

Sincerely,



Nancy M. Swallow, Chairman  
Regional Planning Commission

NMS/jh

cc: White Pine County, Board of County Commissioners  
White Pine County District Attorney  
City of Ely

**RESPONSE TO COMMENT LETTER 11**Response Number 1

Wilderness designation of the Goshute Canyon WSA would not affect the White Pine Power Project. Under the Clean Air Act (as amended, 1977), BLM-administered lands were given Class II air quality classification, which allows moderate deterioration associated with moderate, well-controlled industrial and population growth. The BLM will manage designated wilderness areas as Class II unless they are reclassified by the State.

Response Number 2

Wilderness designation would not necessarily preclude exploration and development of oil and gas and minerals. These activities could continue in designated wilderness areas on valid leases and claims. Lands designated as wilderness are still managed for multiple use. These uses include wildlife, recreation, watershed, and range management. Current range management practices would not change as a result of wilderness designation.

Response Number 3

The proposed actions recommend that 106,216 acres, or 2.8 percent of the Resource Area be designated as wilderness. This leaves 97.2 percent of the Resource Area unaffected by wilderness designation. This is not considered to be an excessive recommendation. The economic and social impacts which would result from the recommendation have been considered.

## CITY OF ELY

BOX 299  
ELY, NEVADA 89301

January 9, 1983

Bureau of Land Management  
SR 5 Box 1  
Ely, Nevada 89301

re: Egan Wilderness Study

Gentlemen:

The Ely City Council at its January 9th meeting discussed the Egan Wilderness Study performed by your agency. The City Council feels if this designation will in any way hurt the economy of Ely (ie: White Pine Power Project, oil and gas exploration etc.) than the City of Ely cannot in any way support this possible designation.

Sincerely

  
Robert Spellberg  
City Clerk

cc: Mayor White  
Ely City Council

Response Number 1

Wilderness designation of the Goshute Canyon WSA would not affect the White Pine Power Project.

COMMENT LETTER 13

December 20, 1983  
Lund Town Council

Dear Sirs:

On the 9th of November 1983, the Lund Town Council held a community meeting at which the proposed wilderness area classification of the South Egan Range was discussed. Those in attendance unanimously expressed opposition to the proposed reclassification and encouraged the town council to draft a letter expressing this feeling. This letter is in response to that request.

The Community feels that the proposed change would be considering the desires and wishes of a chosen few, (many of which are not even familiar with this area) while the majorities viewpoint is ignored. We therefore, proposed that the South Egan Range remain "as-is" with no changes being made.

Sincerely,

Lund Town Council

*John Hendrick*  
*Edith Staffin*  
*Mr. Wayne Pace*

RESPONSE TO COMMENT LETTER 13

Response Number 1

The Proposed Action recommends that all of the South Egan Range WSA is consultable for wilderness designation.

AllanRitchieHeldCompany  
555 Seventeenth Street  
Denver, Colorado 80202  
Telephone 303 293 7577

J. R. Mitchell  
Manager  
Public Lands Coordination  
Government Relations

December 20, 1983

Mr. Merrill L. De Spain  
Ely District Manager  
SR 5 Box 1  
Ely, Nevada 89301

Re: Draft Resource Management Plan/  
Environmental Impact Statement  
Egan Resource Area, Nevada

Dear Mr. De Spain:

Please accept the following comments on the Draft Resource Management Plan and Environmental Impact Statement for the Egan Resource Area in Nevada.

Goshute Canyon (NV-040-015)

We disagree with the proposed suitability for wilderness of 22,225 acres in this area especially 10,300 acres in the middle third of this WSA.

There is high, not moderate, potential for precious and base metals including gold, silver, and lead. The Cherry Creek Range is a major mining district and a prime target for additional discoveries. The "limited number of mining claims" should not be construed as an indication of low mineral interest or potential.

We propose declaring the entire WSA as unsuitable for wilderness, or at the very least, moving the wilderness southern boundary north to the Goshute Creek so areas of mineral and geothermal potential remain open to exploration and development.

RJordan's Well (NV-040-166)

We disagree with the proposed suitability for wilderness of the 37,540 acres in this area especially the 1,210 acres of moderate mineral potential on the southern side of Heath Canyon.

Mining interest in this area is not slight. The Troy Mining District, including the Terrell Tungsten Mine, is within one mile of the WSA. Neither the tungsten mines or the surrounding areas have been fully



Mr. Merrill L. De Spain  
December 20, 1983  
Page 2

3 | explored, but this does not indicate the lack of mineral interest or potential. In addition, there are oil and gas leases and mining claims throughout the proposed wilderness area.

We propose declaring the entire WSA as unsuitable for wilderness based on its geologic favorability for gold, silver, zeolites and salts or at the very least moving the western boundary east so as to open up the area of moderate mineral potential south of Heath Canyon to multiple use that will encourage exploration and development.

South Egan (NV-040-168)

We agree with the proposed unsuitability of this entire WSA based on its energy and mineral potential.

We appreciate the opportunity to comment on the Draft Plan for the Egan Resource Area.

Sincerely,

*Jay R Mitchell*

J. R. Mitchell

RESPONSE TO COMMENT LETTER 14

Response Number 1

The BLM has established a set of definite criteria for assigning classes of mineral potential to different areas. The purpose in first defining these criteria is to allow for judgments about potential that are as scientific and nonarbitrary as possible. However, a certain amount of subjectivity—and therefore room for disagreement—is unavoidable. The Ely District recognizes these differences, but respectfully declines to adjust its judgments solely on the basis of a difference of opinion. All specific comments regarding mineral resource values submitted to the Ely District over the past five years of inventory and study have been given consideration commensurate with their specificity and accuracy.

Response Number 2

The Goshute Canyon WSA has high wilderness values, but it also has high mineral values concentrated in the southern third of the area. The Proposed Action excludes the portions with the highest mineral potential.

Response Number 3

The geologic environments which host ores in nearby areas are not known to occur within the Riordan's Well WSA. The presence of staking claims and mineral leases do not, by themselves, signify the presence of energy or mineral potential. A thorough mineral survey will be conducted by the USGS/BM for the portion that has been recommended suitable for designation.

COMMENT LETTER 15



CONSERVATION CALL  
3942 Hughes Court  
San Diego, Ca. 92115

16 November 1983 Telephone: 619 444-583 583-8486

Merrill DeSpain  
District Manager, Bureau of Land Management  
Scar Route 5, Box 1  
Ely, NV 89803

Dear Mr. DeSpain:

We urge that the four WSAs you have studying in your district be established as wildernesses.

1 Our information indicates that a combination of the Preferred Alternative and the Wilderness Emphasis Alternative would make up an excellent wilderness of the Goshute Canyon Area. Friends, formerly of San Diego, report this as a hiker/backpacker's delight that should total 28,000 acres.

2 We urge the establishment of a South Egan Range wilderness. The 57,600 acres as set forth in Preferred Alternative would surely make a very fine wilderness.

We are glad to endorse the Park Range wilderness of 46,831 acres. As one who hails from a state (Illinois) that once had tall grass prairies, I am particularly pleased that some of Nevada's grassland is slated for preservation.

3 We commend the proposed Riordan's Well wilderness, but suggest that if this is, as mentioned, a most important bird of prey habitat, it should be expanded to 45,751 acres, with hopefully, the addition of those 400 acres dropped because of supposed minerals.

Finally, we strongly oppose all large acreage identifications shown in the Resource Management Plan as listed for sale or any other disposal.

Sincerely,  
*Roscoe A. Poland*  
Roscoe A. Poland, Director



## RESPONSE TO COMMENT LETTER 15

### Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts.

### Response Number 2

Your support for the 57,660 acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted.

### Response Number 3

The most important values in the Riordan's Well WSA, including the scenic areas, raptor habitat, and ponderosa pine, are still contained within the Proposed Action for the area. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

220

## COMMENT LETTER 16

# Defenders OF WILDLIFE

November 28, 1983

Mr. Merrill DeSpain  
Ely District Manager  
U.S. Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89803

Dear Mr. DeSpain:

On behalf of our Nevada members, Defenders of Wildlife submits this letter as our comments and recommendations on your Draft Environmental Impact Statement and Resource Management Plan (EIS/RMP) for the Egan Resource Area. If possible, please include this letter in the appropriate hearing record.

We generally support and applaud BLM's wilderness recommendations outlined in the Preferred Alternative for three of the four Wilderness Study Areas within the Egan Resource Area. However, we believe that additional wilderness protection is necessary and appropriate.

1 For example, we recommend that the Goshute Canyon wilderness proposal be increased to about 28,600 acres between the Preferred Alternative and the Wilderness Emphasis Alternative. As you know, this is a magnificent roadless area, with important natural values, including cutthroat trout, spotted bats, and bristlecone pine. Expanded wilderness protection would benefit these and other values, and is compatible with the Goshute Canyon Natural Area.

With respect to the Park Range, we commend BLM for the outstanding 46,431-acre wilderness recommendation. This area contains pristine scientific studies.

2 While we support the 37,542-acre wilderness proposal for Riordan's Well, we believe this should be increased to the 45,791 acres within the Wilderness Alternative, along with another 400 acres on the west side which were improperly omitted due to speculative mineral potential. This Wilderness Study Area has a number of impressive primitive values, including ponderosa pine forest stands and raptor sites.

3 We are disappointed, however, that BLM did not recommend any wilderness for the South Egan Range within the Preferred Alternative. We feel that the 57,660 acres in the Wilderness Emphasis

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

## COMMENT LETTER 16

2.

- 3 | Alternative is desirable and necessary. This Wilderness Study Area, with its white fir forests, ancient bristlecones, and limestone cliffs, possesses valuable wildlife habitats. Abundant populations of deer, raptors, and other species will benefit.

Finally, we wish to express several overall concerns. First, we hope that BLM will consider these wilderness recommendations in the proper perspective. If Congress approves all of these recommendations, well over 90% of BLM lands will remain under multiple use management. Stated another way, since federal lands should be managed to include wilderness and to recognize the public's support for wilderness protection, it is certainly reasonable to set aside this relatively small fraction of public lands within your jurisdiction as wilderness. It is also important to underscore that fishing, hunting, hiking, and other passive recreational activities are compatible with and allowed in wilderness, as is grazing.

- 4 | Second, qualified Wilderness Study Areas should receive wilderness protection and not be denied wilderness status because of speculative mineral potential. Mineral surveys should focus on public lands generally, both in and out of Wilderness Study Areas, to determine the location of marketable reserves, and to compare mineral values in and out of Wilderness Study Areas. This level of precision and comparison is extremely important. If marketable mineral reserves are not located or identified within a Wilderness Study Area, these areas should not be disqualified for wilderness protection simply because some degree of speculation on possible future developments may linger among some commercial interests.
- 5 | Of course, where demonstrable marketable reserves do occur in Wilderness Study Areas, this requires a more difficult balancing of competing values. In some instances, the designation of Areas of Critical Environmental Concern may provide an acceptable compromise. Thus, we recommend that, whenever possible, mineral analyses occur in a comprehensive fashion through all or most of a Resource Area.

Lastly, we are greatly disappointed that both the Preferred Alternative and Alternative "C" propose the sale of about 80,000 acres for community expansion, ranch annexation, and agricultural programs. We strenuously oppose any such large-scale proposals to sell or dispose of public lands. Indeed, the White House, through the Property Review Board and the Department of the Interior, have reportedly discontinued the controversial and ambitious "asset management program." We, therefore, urge you to reconsider and reject these land sales proposals.

Please keep us informed on your planning activities and management actions affecting the above Wilderness Study Areas.

## COMMENT LETTER 16

3.

Thank you very much for considering our views.

Sincerely,

*Richard Spotts*  
Richard Spotts  
California/Nevada Representative  
Defenders of Wildlife

5604 Rosedale Way  
Sacramento, CA 95822  
(916) 442-6386

RS/js

## RESPONSE TO COMMENT LETTER 16

### Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts.

### Response Number 2

Your preference for the 45,791 acres, Wilderness Emphasis Alternative from the draft document is noted. The most important values in the Klondan's Well USA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action for the area.

### Response Number 3

Your support for the 57,660 acres, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area will be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

### Response Number 4

Except in a very few cases, it is impossible to say absolutely whether or not minerals exist in an area without spending many millions of dollars and impacting some of the values which are being considered for protection. However, the confidence with which assessments of potential are made can and have been ranked, and these rankings have played a part in the final recommendations contained in this document.

Resource area-wide surveys are desirable for conducting wilderness studies, but in the case of the Egan studies were impossible to attain because of funding and timeframes. (They have been available for other studies, such as those for the Schell Resource Area in the Ely District.) There is nonetheless some implicit judgment about the relative abundance of outside opportunities in the selection of the proposed action and in the statements about its impacts on energy and minerals.

### Response Number 5

Unlike wilderness areas, ACEC's are not necessarily areas in which no development can occur. An ACEC designation is not a mineral withdrawal; withdrawal authority is retained by the Secretary of the Interior. The BLM did not find that ACEC designation of nonsuitable wilderness acreage in the Egan Resource Area was warranted.

## COMMENT LETTER 17

EASTERN NEVADA



EASTERN NEVADA TRAPPERS & FURTKAKERS, ASSOC.  
P.O. BOX 1304 — McGILL, NV 89318

December 22, 1983

Mr. Merrill DeSpain  
District Manager  
Bureau of Land Management  
F.R. 5, Box 1  
Ely, NV 89301

Dear Mr. DeSpain:

These comments are in response to the Egan Resource Area Management Plan and Environmental Impact Statement. The following comments represent the Eastern Nevada Trappers and Furtakers Association's response to this document. Our association is based in White Pine County, Nevada and made up of informed, concerned, and active conservationists, many of which have lived in the area and Nevada most of their lives. They know the Egan Resource Area and the various opportunities it provides recreationists very well.

It should be noted that the user group we represent have historically made the most use in the Egan proposed wilderness areas. Traditionally trappers have always tried to protect and preserve the wilderness characteristics of our Nevada ranges along with other state sportsmen groups. Were it not for these users' concern, many of those areas considered suitable as per BLM evaluations, may not have been so.

Our association has determined that the preferred alternative is the best alternative of those presented in the Egan RFP Summary. We are truly concerned with any current access routes being closed. Since this has been taken into account by the BLM and existing roads into wilderness areas will continue to allow access to public uses, we support the proposed alternative. However, we support prevention of future access ways into these locations.

Again our support for the proposed alternative is based on assurances that hunting and trapping users have always been compatible within these areas prior to wilderness designation, and these activities will continue to be allowed there.

We feel comfortable with the BLM's handling of the livestock use in the Egan Resource Area. However, we are concerned that the Feral Horse populations are, and will continue to have, significant adverse impacts to the resource. These animals should be reduced to far lower numbers, and managed in such a way as to keep the population down.

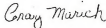
## COMMENT LETTER 17

2

They have the potential to far more adversely effect the wilderness area's and the resource area at large, than most other users which are much more closely controlled.

We appreciate your extending to us the opportunity to comment on this EIS. We hope you'll consider our input, and continue to keep the association apprised on the progress of your actions on these matters.

Sincerely yours,



Craig Marich, Secretary  
Eastern Nevada Trappers and Furtrappers Assoc.  
Box 1394  
McGill, Nevada 89318

## RESPONSE TO COMMENT LETTER 17

### Response Number 1

The BLM Wilderness Management Policy states that hunting, fishing, and trapping are compatible with wilderness and will be allowed, subject to applicable State and Federal laws and regulations.

## COMMENT LETTER 18



ECOLOGY CENTER OF SOUTHERN CALIFORNIA  
Project of Educational Communications, Inc.  
P.O. Box 54473, Los Angeles, CA 90035

Telephone (213) 559-9160

December 5, 1983

Mr. Merrill DeSpain  
Ely District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, NV 89301

Dear Mr. De Spain:

We understand your district is considering the suitability of the four below areas of the Egan Resource Area, for Wilderness Designation. We would like to present to you our recommendations for same:

1. Goshute Canyon WSA: This has especially high wilderness values, including the Goshute Cave Geological Area. We think it possible as well as desirable to have a 28,600 wilderness of outstanding qualities by combining two of the alternatives listed by ELM.
2. South Egan Range WSA: 37,600 acres listed in your Draft EIS would make a fine wilderness. Also an important raptor location.
3. Park Range WSA, one of Nevada's last remaining grasslands. We wish to commend BLM for recommending 46,831 acres.
4. Riordan's Well WSA: we recommend 45,791 acres, over the proposed 37,542, because this area is an important bird raptor location. There are seventeen peaks over 8000 feet.

We are opposing 79,800 acres recommendation on the grounds that the Interior Department has announced they are no longer considering large scale land sales.

We urge a more comprehensive environmental stewardship for these areas, and trust our comments will be part of your records.

Sincerely,

*Elaine Stansfield*  
Elaine Stansfield  
Assistant Director

ES:mp

NO  
A

## COMMENT LETTER 18



ECOLOGY CENTER OF SOUTHERN CALIFORNIA  
Project of Educational Communications, Inc.  
P.O. Box 54473, Los Angeles, CA 90035

Telephone (213) 559-9160

December 10, 1983

Mr. Merrill DeSpain  
Ely District Manager  
United States Bureau of Land Management  
Star Route 5, Box 1  
Ely, NV 89803

Dear Mr. DeSpain:

As the Ecology Center of Southern California members have expressed to you before, extensive wilderness designation is crucial for the protection of valuable natural areas in our Southwest deserts. Because those of us living in the urban and rural areas of Southern California appreciate the wildness of the United States landscape, we believe that it is your agency's responsibility to designate extensive acreage as part of the National Wilderness System.

Please revise your Environmental Impact Statement so that your Preferred Alternative for the Wilderness Study Areas in the Egan Resource Area includes portions of all sections. Since these areas encompass 236,780 acres of public land which qualified for WSA status on the basis of naturalness, solitude, and/or outstanding primitive recreational opportunities, why not give full protection? Specifically:

1. Goshute Canyon Area--needs 28,600 acres to protect its caves, bristlecone pines, rare spotted bats and Utah Cutthroat trout; the limestone cliffs complement 10,342 foot Exchange Peak; such wildlife in the Goshute Canyon Natural Area which is part of this Wilderness Area
2. South Egan Range--57,660 acres would make a nice addition to save limestone cliffs and white fir forests
3. Park Range--46,831 acre BLM recommendation is excellent for this rugged remote area with few resource conflicts; virgin grasslands and meadows are guarded by rugged cliffs
3. Riordan's Well--45,791 acres would protect ponderosa pine forests and an important predatory bird raptor area.

Thank you for your consideration of our recommendations. Please add this letter to our other correspondence as part of the public record.

Sincerely yours,  
*Nancy Sue Pearlman*  
Nancy Sue Pearlman  
Executive Director

NSP:ez

## RESPONSE TO COMMENT LETTER 18

### Response Number 1

Your preference for a 28,600-acre alternative has been noted. The BLM determined the four alternatives analyzed were sufficient to adequately address the environmental impacts.

### Response Number 2

Your support for the 57,660 acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic limestone cliffs, white fir, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

### Response Number 3

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Eldoran's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.

## COMMENT LETTER 19



December 21, 1983

Merrill L. DeSpain  
District Manager  
S. R. 5 Box 1  
Ely, Nevada 89301

Re: Egan Resource Management Plan

Dear Mr. DeSpain:

The Plan and EIS fail to address the possible impacts of the White Pine Power Project. While it is acknowledged that not all possible projects can be addressed, and a separate EIS is being prepared on WPPP, there should be some acknowledgement of impacts on Goshute Canyon WSA, wetlands and other resources.

Generally we support the objective and management actions of Alternative B, specifically the protection and enhancement of natural resources values and wildlife. The listed wetlands available within the Egan Resource Area must be managed for wildlife values regardless of which alternative is selected.

For wilderness study areas included in the Egan Resource Area, we recommend the following:

- A. Park Range - We concur with the preferred alternative.



## COMMENT LETTER 19

2-

- 1 B. Riordans Well - We concur with the wilderness emphasis alternative in that the boundaries should form a manageable unit and boundaries should be easily identifiable.
- 2 C. South Egan Range - We feel that the EIS and technical report write-up are prejudiced against wilderness. The variety extent and significance of the special features contribute to the importance of this WSA. We recommend the wilderness emphasis alternative.
- 3 D. Goshute Canyon - We would recommend that all of the WSA be found suitable for wilderness, but as a compromise, we could settle for the preferred alternative area.

With the change in the Administrations emphasis on land disposal, and with the declared policy of Congress (second sentence of FLEPMA) "that the public lands be retained in Federal ownership", we ask that you reevaluate the lands disposal proposals in the plan, and retain all lands in a public use concept, available to all the people.

Sincerely

Janet C. Meierdierck  
President  
Lahontan Audubon Society

## RESPONSE TO COMMENT LETTER 19

### Response Number 1

Your preference for the 45,791-acre Wildermeesa Emphasis Alternative from the draft document has been noted.

### Response Number 2

Your support for the 57,660-acre, Wildermeesa Emphasis Alternative for the South Egan Range in the draft document is noted.

### Response Number 3

Your preference for the All Wilderness Alternative for the Goshute Canyon WSA has been noted.



## MINERALOGICAL RESEARCH CO.

DIVISION OF THE NAZCA CORPORATION  
 Eugene & Sharon Cisneros • 704-706 Charcol Avenue • San Jose, California 95131-2292 U.S.A.  
 Phone: (408) 263-5422 DAYTIME  
 (408) 923-6800 EVENING

DECEMBER 8, 1983

Merrill DeSpain  
 Ely District Manager  
 U.S. Bureau of Land Management  
 Star Route 5, Box 1  
 Ely, NV 89303

Subject: Egan Resource Area

Dear Mr. DeSpain:

It has come to our attention that the Ely District of the BLM is considering the suitability of four Wilderness Study Areas in the Egan Resource Area for inclusion into the National Wilderness System, specifically, the Goshute Canyon Area, South Egan Range, Park Range, and Riordan's Well.

Our company has been directly involved in the marketing of mineralogical samples for research institutions, school use, private collection, and museum display for nearly twenty years. While we have, from time to time, had the opportunity to deal in small amounts of mineral samples from the State of Nevada, we have never been offered, or heard of, any valuable mineralogical or mining areas or sites within the area in question. If such resources exist, they would be of an extremely small type of deposit, and certainly would not constitute what you could refer to as a valuable mineralogical occurrence or mineral reserve, suitable for mining.

We feel it is extremely important to preserve these valuable wilderness areas, and that mining ventures in these areas should not be allowed, on the basis of our observations of the materials present in quantities sufficient to support profitable ventures on the part of the mining industry, during the time we have been in business.

Very truly yours,

MINERALOGICAL RESEARCH COMPANY  
 DIVISION OF THE NAZCA CORPORATION

*Sharon L. Cisneros*

Sharon L. Cisneros  
 Corporate Vice President

SLC:mek

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 Mineralogical Books — Mineralogical Record Back Issues

### Response Number 1

Your support for wilderness designation of the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well USA's have been noted.

## COMMENT LETTER 21

ROBERT E. WARREN  
Executive Secretary  
The Wilderness Society  
Washington

October 27, 1983

MEMORANDUM FOR THE EXECUTIVE DIRECTOR  
FROM: ROBERT E. WARREN  
SUBJECT: BLM'S PLANNING ASSUMPTIONS

Mr. Edward F. Spang, Director  
Nevada Bureau of Land Management  
Post Office Box 12000  
Reno, Nevada 89520

Re: Egan Resource Area Wilderness Proposals

Dear Ed:

1 I am dismayed to learn the Ely District is recommending three out of the final four WSAs as wilderness. The mining (and eventually ranching) industry can be severely harmed by BLM's apparent willingness to support so much wilderness in Nevada.

Enclosed is a copy of the Nevada Mining Association testimony on the BLM's proposal. I hope you can find time to read it.

2 Because BLM's ground rules were laid down by the Carter-Andrus Administration, which was frequently hostile to Western interests and the concept of multiple use of the public lands, the BLM's planning assumptions suffer from a systemic bias toward wilderness and against the mining industry.

3 If the mining industry loses access to these key mineral areas - some of the highest potential sites in the state - the industry will gradually diminish to an insignificant economic impact in our rural counties.

If BLM and the Forest Service continue to recommend so many wilderness areas for Nevada, this state will move from the state with the least wilderness (one at Jarbidge) to the most in the nation.

4 Additionally, when the buffer zone concept is eventually accepted by Congress (it passed the House this month), most of the industrial and agriculture activities within Nevada's valleys will fall under the surveillance (and to an alarming degree the control) of the Federal government. (See enclosed article on buffer zones, taken from the Summer issue of the NMA BULLETIN.)

Sincerely,



Robert E. Warren

REW:iv  
Enc.

\* Robert Warren's testimony is printed in the oral testimony section.

## COMMENT LETTER 21

## BUFFER ZONE

Cont. from page 3

Bill offers little protection for parks

delay for the Congressional review.

The bill offers little enhanced protection for the parks. Federal statutes are replete with requirements, to control, sensitivity in and around parks (Clean Air Act, National Environmental Policy Act, etc.). Similarly, the existing Federal project approval process has many park system safeguards already built-in. For example, the legislation establishing the U.S. Department of Transportation provided that all projects must preserve the natural beauty of the countryside, public park and recreation lands, wildlife and waterfowl refuges and historic sites. Around these basic requirements a body of law has developed requiring environmental impact statements and reviews for project impacts on water pollution, coastal zones and wetlands, endangered species and historic properties.

The meaning of "adjacent" land is unclear. In addition to its duplication of the existing safeguards, the bill fails to define adjacent land. Hundreds of thousands of acres of Federal, state, local and private land could fall under the controls created by HR 2375. This imprecise nature invites constant and continued litigation. Ultimately, the courts may be forced into deciding the future of hundreds of road projects each year.

-RW-

## Environmentalists sue EPA to enforce buffer zone concept

Environmentalists are suing the Federal Environmental Protection Agency (EPA) in an effort to force the Reagan Administration to adopt the buffer zone (integral vital) concept of protection of visibility from within Federal conservation lands.

The environmental groups claim the EPA must not permit "undeirable" activities to take place outside of national parks, wildlife refuges, and wilderness sites which might be viewed by persons from within the protected federal conservation lands.

Such activities could include mining, ranching, farming, land developments, construction (in short, any man-caused action which environmentalists may consider detrimental to the enjoyment of persons within the conservation lands). Should the buffer zone concept be adopted, environmentalists can ask the courts to limit, control or stop the "offensive" activities.

The suit is being brought by the National Parks and Conservation Association, the Environmental Defense Fund, and the Colorado Mountain Club. It is also supported by the Sierra Club, the Wilderness Society and other preservationist organizations.

The suit charges that EPA has done nothing to implement 1980 (Carter-Andrus) rules to control the lines of sight outside the boundaries of the parks, refuges and wilderness areas. The rules ask all states to develop such plans; but none have complied.

The Reagan Administration has also refused to adopt the buffer zone concept of restricting commercial and industrial activities within the line of sight of the parks and wilderness areas.

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4 - Nevada Mining Assn. BULLETIN - Summer '83

RESPONSE TO COMMENT LETTER 2 I

Response Number 1

The proposed action recommend that 106,216 acres, or 2.9 percent of the Resource Area be designated as wilderness. This leaves 97.1 percent of the Resource Area unaffected by wilderness designation. The economic and social impacts which would result from the recommendation have been thoroughly considered. Impacts to the mining and ranching industries have been evaluated in this document.

Response Number 2

The basis for the BLM's wilderness review has been the Wilderness Act of 1964, passed by the U.S. Congress during the early Johnson Administration, but conceived during the days of the Eisenhower and Kennedy Administrations. This Act sought to ensure recognition and protection for one particular legitimate use of the land--wilderness--within a multiple use framework. It applied to Forest Service and National Park Service lands. The Federal Land Policy and Management Act, passed by Congress in 1976, directed the Bureau of Land Management to conduct a wilderness review of the lands it administers in accordance with the guidance set forth in the Wilderness Act. The BLM's "ground rules" for developing wilderness recommendations were issued in February 1982, with the publication of the Wilderness Study Policy, Policies, Criteria and Guidelines for Conducting Wilderness Studies on Public Lands. This policy was issued during the present administration. The specific procedures for inventory and wilderness study were developed only after lengthy and wide-ranging public comment periods were held throughout the nation. These extensive efforts were made to avoid bias of any sort in the process.

Response Number 3

The assessment of mineral potential has been given top priority in the wilderness studies. Not only is this policy, it is mandated in the Wilderness Act and the Federal Land Policy and Management Act. The best information available to the BLM at this time indicates that withdrawal from mineral entry of the 2.8 percent of the Resource Area contained in the suitable areas would affect the mining industry very little. However, this analysis is just the beginning. Every area that is found suitable for designation must undergo an extensive mineral survey conducted by the U.S. Geological Survey and the U.S. Bureau of Mines. New findings can affect the suitability recommendation for any USA. The redundancy and intensity of minerals impact analysis is designed to avoid any major economic dislocations.

Response Number 4

The Bureau of Land Management's Wilderness Study Policy explicitly states that "no buffer zones will be created around wilderness areas to protect them from the influence of activities on adjacent lands" (11.8.9).

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COMMENT LETTER 22

NATIONAL PUBLIC LANDS TASK FORCE  
NEVADA OUTDOOR RECREATION ASSOCIATION, INC.

October 26, 1983

P.O. Box 1245  
Carson City, NV 89702

Enclosed 1983

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Merrill De Spain  
District Manager  
KIV District  
U.S. Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89503

Subject: Egan Resource Area  
RNP and EIS hearings

Gentlemen:

To begin, concerning the RNP, this organization has serious objections to raise concerning the proposed land sales within the district. In the Egan proceeding, the BLM proposes to offer for sale nearly 80,000 acres within the scope of just a single BLM resource area. We find this truly astonishing... In light of both the Secretary of Interior's and the Property Review Board's clear pronouncements that large scale land sales would cease on the Federal lands. There's always someone who does not get the word.

I recently visited Boston, Mass., where I was briefed by our attorneys at the Nevada Outdoor Recreation Association is a co-plaintiff in a lawsuit challenging the legality of the "asset management" land sales (privatization) program. We consider this whole program as nothing less than a "Great Terrain Robbery" that would deny Americans and future generations their landed inheritance. Incidentally, while in Boston--I learned that at the last court hearing before Federal Judge Andrew A. Caffrey, the Justice Department attorneys had assured the court that "all substantial sale programs, as charged by the plaintiffs, are no longer being considered by the USDO". Gentlemen, in the light of all this, these sales violate not only PLPMA law but new extant government policy. They should be removed from the RNP.

WILDERNESS RECOMMENDATIONS:

(1) GOSHUTE CANYON: we endorse a combination of the preferred alternative and the wilderness emphasis alternative. We have visited this exceptional and unique wildland. The existence of the native trout streams and such wonders as Goshute Cave were first inventoried by the NOAA Index & Survey nearly 20 years ago. In the mid-1970s, we again visited the canyon and actually saw native fish in Goshute Creek. We came away truly impressed with its geological, botanical, archeological and wildlife attributes. The area has rare spotted bats, Utah outthroat trout, ancient bristlecone pine forests and truly spectacular cliffs and canyons. We urge preservation of 28,600 acres.

(2) SOUTH EGAN RANGE: we are concerned and perplexed over the failure of the BLM to include this area in its preferred alternative. We know of stunning sets of towering bluffs, hidden

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## COMMENT LETTER 22

Egan Resource Area

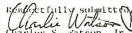
page two

2 gorges, white fir forests from Brown Knoll to Sheep Pass Canyon. Again, this area contains ancient bristlecone pines and an unusual pit cave - Angel Cave - near the top of the range. The Egan Range is known to us as an important habitat for predatory birds. All too often, we have seen the BLM indicate that "ways" both in and outside of the USA constitute "substantial" intrusions and therefore effect solitude, we challenge statements in the technical report which assert that "ways" impact the rugged and sublime interior of the range. These for the most part are but paths that actually help the casual hiker enjoy the wilderness through-hike. This is truly one of the ruggedest wildlands in the state. It is an exceptional area; and we recommend protection of 57,660 acres.

3 (3) PARK RANGE: we have known this area from explorations dating back to 1960. This range was one of the first defacto roadless areas to be noted in our Nevada Outdoor Recreation Resources Index & Survey, while there are no towerline peaks, it is one of the most pristine massi-type mountain areas in the state. It is known to us for its hidden alens, meadows which have rarely been grazed and colorful bluffs and cliffs. It has high value for wilderness screening since it is well forested. We urge 46,331 acres for wilderness protection.

4 (4) WILSON WELLS: this organization urges 45,791 acres as suitable for protection as wilderness. These mountainous ridges which extend to 9,352 feet is an area rich in geological displays: faulting, complex thrusts and volcanism. It's higher slopes are covered with virgin ponderosa and there are cliffs, bluffs and ridges known to contain important predatory bird captures. It is an important winter deer habitat, and we have received reports of elk in the USA. There is a cave system in the area, which has yet to be explored and mapped by professional spelunkers. Too many of these virgin caves are being lost, even before the most rudimentary examinations can take place. We stiple are not convinced by reading the BLM's technical report, that they truly understand what transpire through this series of connected Grant Range ridges is. Surely, enough is known concerning its wilderness character to upgrade the BLM's preferred alternative.

5 In closing, we must point out a glaring omission in all the BLM reports we have examined concerning lands and resources in the Egan Resource Area. Since 1959, we have repeatedly brought the NORA Index & Survey into the district office. Much information in BLM files, almost all from this report 25 year old project. We would ask the Ely District to make the corrected reference to the project in its final revisions to both the NRP and wilderness EIS. The NORA Index & Survey is a large inventory, consisting of mainly maps, short narratives and extensive color photographs of BLM wildlands dating back to 1958. Even the Public Land Law Review Commission and the National Park Service have noted that it was the original BLM Public Lands environmental project in the nation. We trust that the record will be corrected.

Respectfully submitted,  
  
 Charles S. Watson, Jr.  
 Director

attachments: May 17, 1967 letter  
 (3 pages)  
 July 7, 1983 Edwin L. Harper  
 (Ely House) letter  
 July 18, 1983 USDI Sec. Watt letter

## COMMENT LETTER 22



BLM-PL-7 (7/12e)  
 6101.7 (712e)

UNITED STATES  
 DEPARTMENT OF THE INTERIOR  
 BUREAU OF LAND MANAGEMENT  
 WASHINGTON, D.C. 20240

May 17, 1967

Mr. Charles S. Watson, Jr.  
 P. O. Box #601, Lemay Branch  
 6197a Lemay Ferry Road  
 St. Louis, Missouri 63125

Dear Mr. Watson:

Thank you for your letter of May 10, 1967 and the attached correspondence from Mr. Baker to Dr. Lyon, dated April 27, and Mr. Baker's letter to you on the same date.

You have raised several questions in your letter that I will try to answer as best I know how:

1. "It would appear that his letter to Dr. Lyon indicates Mr. Baker knows nothing at all about the 'task force' on recreation you discussed with George Kell and I early last year. I had understood that during your trip to Nevada, at that time, you discussed this with Mr. Baker and Mr. Kell. As I recall it was agreed 'NORA' Inc. would be made a part of this 'task force on recreation'."

Answer:

My one and only trip to Reno, Nevada in connection with the N.O.R.A. program was when Mr. Penny was State Director. Mr. Kell was at that time Assistant State Director of California. A meeting was held by me with Mr. Kell of N.O.R.A., Mr. Penny and Mr. Baker at that time. As I recall, our general discussion with Mr. Kell centered around a "joint effort" on the part of N.O.R.A., BLM and other agencies, to identify, study, exchange information, and assess outstanding scenic, natural, historic and outdoor recreation opportunities on BLM lands in Nevada. In my phone conversation yesterday with Mr. Baker, he stated that he recalled no specific reference to the establishment of a task force during this meeting. I believe this to be understandable in that our discussion was general and was mostly focused on joint efforts in the exchange of information and how N.O.R.A. and BLM could best accomplish this. As I recall, no reference was made toward establishment of a working group, membership of group or assigned responsibilities normally considered the formation of a task force. I am assuming that you have somewhat the same viewpoint of what constitutes a task force.

## COMMENT LETTER 22

It was my view during that meeting and subsequent meetings with you, that joint efforts are necessary between your organization and ours (and other agencies) to be sure that all the outdoor recreation opportunities on BLM lands in Nevada are identified and that we move as rapidly as we can to preserve and protect them within the limitation of funds and manpower.

It was not my intention to establish a task force on recreation for Nevada with specific membership, specific duties and specific responsibilities, but rather your group and ours work together jointly to freely exchange information and receive the benefit of individual knowledge, expertise and experience. I recall stating to you that joint effort could best be accomplished by identified individuals of your organization and ours studying together the opportunities in Nevada. This is what I envisioned we should do, both here and at the field level. Whether I called it "task force" or "joint effort" I truthfully don't recall. Nevertheless, it still is my view that we should continue to objectively analyze together, cooperatively, the Nevada recreation resources - endeavoring to find ways to preserve and protect them. You are, and have been the spokesman for N.O.R.A. and I have sought to the best of my ability to discuss with you the various problems in order that you can participate jointly in our effort; I will continue to do this. I do not, however, feel that this effort requires a formal working group with an established membership, and responsibilities.

2. "I would also appreciate an explanation of what Mr. Baker means by his claim that N.O.R.A.'s survey had been considered. . . ."

## Answer:

It would be my thinking that Mr. Baker is referring to actions taken both at the Washington level and Nevada level in connection with the N.O.R.A. survey.

A good deal of time has been spent at both levels in comparisons of inventory information, analysis of significant areas, and, being sure that all possible opportunities are identified. This includes microfilming the N.O.R.A. survey at the State Office, and providing the respective District offices with all this information. Each District office in its development of plans for protection, preservation and development is giving and will give full consideration to N.O.R.A.'s inventory along with BLM's to be sure that no opportunities are missed. To my knowledge your inventory and assessment of significant areas is a very basic part of our inventory, and that through the exchange of information between N.O.R.A. and BLM, both of us have a pretty good picture.

I have always enjoyed our discussions over the many hours we have spent analyzing inventories and problems of protection of the Nevada recreation resources. I hope you will continue to give me your viewpoints and comments as they occur to you.

Sincerely yours,

*Eldon F. Holmes*  
Eldon F. Holmes  
Chief, Recreation Staff

## COMMENT LETTER 22

THE WHITE HOUSE

WASHINGTON

July 7, 1983

Honorable James Watt  
Secretary of the Interior  
Washington, D.C. 20240

Dear Secretary Watt:

I am writing to clarify the role of the Property Review Board as it relates to the disposal of public lands by the Department of the Interior. In Executive Order 12348 the President directed the Board to develop and review policies of Federal agencies as they relate to the management of real property. In this regard, the Board has consulted with the Department of the Interior to determine the Department's current land management policies and to give the Department guidance as to where those policies could be adjusted to make them consistent with the provisions and the philosophy of the Executive Order. The Executive Order did not intend nor has the Board presumed for the Board to become involved in the operational functioning of the agency in regard to the management of the public lands.

The Board has not requested that you consult with it in regard to transactions where land is sold for fair market value. We are interested in the Department's sales program in order to monitor the progress being made in the disposal process, but it is not our intent to in any way inhibit the statutory authority granted you to sell BLM lands. It would be helpful if the Department of the Interior provided the Board monthly with a summary of the previous month's sales activity.

I trust that this letter will clarify any confusion that may have existed concerning the Board's role in the Department of the Interior's disposal process.

Sincerely,

*[Signature]*  
Edwin L. Harper  
Chairman, Property Review Board



## COMMENT LETTER 22



THE SECRETARY OF THE INTERIOR  
WASHINGTON

July 18, 1983

MEMORANDUM TO WESTERN GOVERNORS

FROM: Secretary of the Interior

SUBJECT: Good Neighbor Policy

I was particularly pleased with the opportunity to share with you the tremendous successes we have had in the last two and a half years. I felt your questions, both in private and public, dramatized the real progress that has been made. The questions that were not asked were more revealing than the questions that were. As I reflect back over the several meetings we have had in the past and compare them to the Montana meeting, I am delighted with the progress that has been made. That is not to suggest, however, that more progress does not yet remain to be realized.

One of the areas that continues to draw criticism deals with the disposal of lands no longer needed by the Federal Government. I am satisfied that the mistakes of 1982 are not being, and will not be, repeated. Each Governor has been briefed, or his staff has been briefed, on our plans for disposing of the few isolated tracts in the respective states. Several of you did suggest that we needed to reduce the involvement of the Property Review Board of the White House in the Department of the Interior activities. I assured you that as a practical matter they were not involved, but I would seek to formalize that relationship.

Upon returning to Washington, I have secured from the Chairman of the Property Review Board a letter that clearly states that the Board was not to "become involved in the operational functioning of the agency (Interior) in regard to the management of the public lands." I am attaching a copy of that letter just so that there can be no doubt. I am satisfied, based on the private conversations and the public dialogue, that there is no room for criticism of this program as it relates to future activities. Criticism of the past is for the most part justified.

I look forward to improving relationships and thank you for helping us to be as successful as we have been.

If you have any concerns or questions, please call. The rule continues to be that if I don't hear from you, things are going well.

## RESPONSE TO COMMENT LETTER 22

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts. The native trout streams and Goshute Cave are contained within the Proposed Action.

Response Number 2

Your support for the 37,860-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, bristlemore pine, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

Your support for the Preferred Alternative for the Park Range, in the draft document has been noted.

Response Number 4

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Wall WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.

Response Number 5

The efforts of NORA (and many other groups and individuals) to provide relevant information about the Egan WSA's are greatly acknowledged by the Ely District. Comments received from NORA have been considered and are on file with all other public comments received during the inventory and study of lands for wilderness designation.

## COMMENT LETTER 23

Only one page of this lengthy letter dealt with wilderness and was reproduced in this document. The entire letter can be found as comment letter 54 in the Proposed Egan RMP/Final EIS.

Page 97 of the DEIS states that "Added costs to livestock operators would occur because of wilderness designation".

**Question:** As wilderness designation benefits will accrue primarily to recreationists, why should a livestock operator need to incur higher costs? Would it not be equitable for the BLM, acting on behalf of the non-paying recreationists, to incur these additional costs?

**Recommendation:** Added range improvement development and maintenance costs attributable to wilderness designations will be easily quantified. Because these benefits will accrue to recreationists, we would recommend that wilderness area users, their special interest representatives, or the public (via the BLM) pay any added costs associated with range improvements in wilderness areas.

None of the discussions of economic impact associated with the various alternatives (pp. 118-151) addresses the added costs of production that will occur after 1994 as all rangeland improvement maintenance costs and a higher share of development costs are shifted to permittees.

**Question:** Has the BLM considered the ability of permittees to share in development costs and incur full maintenance costs for new range improvements proposed to improve vegetative conditions throughout the area?

**Recommendation:** The eventual success of any of the alternatives presented in the DEIS in accomplishing its intended objectives will depend heavily upon development of new and/or maintenance of existing range improvements. Because the Rangeland Improvement Policy will effectively shift the major costs of new improvements and maintenance of existing ones to the livestock industry, the industry's ability to incur these additional costs must be considered. The Final EIS should include an analysis of the livestock industry's ability to finance in whole or in part the range improvements proposed under each alternative.

Further, because the Rangeland Improvement Policy directs that primary beneficiaries (51 percent or greater) of range improvements will bear the cost of maintenance, the question of how maintenance will occur under alternative K should be addressed. Where will the funding come from? Under NEPA it is doubtful that selection of any management approach can be completed until the EIS is expanded to address these questions.

RESOURCE CONCEPTS INC.  
340 N. Merriwell - Casper, WY, 82401 - (702) 881-1000

## RESPONSE TO COMMENT LETTER 23

### Response Number 1

This only refers to added costs of new range projects. Costs will be higher to wilderness study areas because of the emphasis placed on use of the least impacting construction methods and most environmentally compatible materials. It would have been more accurate to say that, if it was decided to construct a new project within a wilderness study area, the construction costs would be higher. However, the majority of projects in the Egan Resource Area are funded by BLM, not the rancher.

## COMMENT LETTER 24

Marion DeSpain  
District Mgr. - B.L.M.  
Ely District

Dear Merrill:

The following are my comments concerning wilderness recommendations for the Egan Reserve Area:

- 1) Goshute Canyon -- The outstanding characteristics of this special area are well known and well documented. I support the entire 35,594 acre area for wilderness. Additionally, you should develop a "wilderness enhancement" alternative. This has been done successfully in Wyoming. Such an alternative would expand the area north & west beyond the defunct "Indian Creek Way", and include the high ridges at the head of Goshute Creek; it also <sup>is</sup> close down the so-called "Paris Canyon" road". I am interested in protecting complete drainage systems; unfortunately this area has been dissected. I haven't given up on protecting an expanded Goshute Canyon area -- but apparently you have.
- 2) South Egan Range -- I support the 57,660 acre "wilderness emphasis" alternative for this suggest and beautiful area.
- 3) Park Range -- Your preferred alternative recommendation for this area is very good. Don't back down from this proposal.
- 4) Rivordan's Well -- I support wilderness for the entire area of 57,002 acres. This area is a vital component of the Grant Range wilderness complex, and should be recommended in full.

Thank you,

Best Koehler  
Consultant for  
Newspaper Wilderness Assoc.

## RESPONSE TO COMMENT LETTER 24

## Response Number 1

Your preference for the 35,594-acre All Wilderness Alternative for the Goshute Canyon WSA is noted. Our regulations do not provide for your suggestion of a Wilderness Enhancement Alternative which reaches beyond the original WSA boundaries, unless it is for enhancing manageability. The WSA boundaries were finalized in 1980 with the publication of the Final Wilderness Inventory Decisions.

## Response Number 2

Your support for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted.

## Response Number 3

Your support for the Preferred Alternative for the Park Range WSA is noted.

## Response Number 4

Your preference for the 57,002-acre All Wilderness Alternative for the Rivordan's Well WSA is noted.



## SIERRA CLUB

Toiyabe Chapter - Nevada and Eastern California

PLEASE REPLY TO:

GREAT BASIN GROUP  
P.O. Box 19777  
Las Vegas, Nevada 89119

LAS VEGAS GROUP  
P.O. Box 19777  
Las Vegas, Nevada 89119

December 23, 1983

Merrill DeSpain, Manager  
BLM/Ely District  
Star Route 4, Box 1  
Ely, NV 89803

Dear Manager DeSpain,

I am submitting these comments on the Egan Draft Resource Management Plan and Draft Environmental Impact Statement as Chair of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club. The Toiyabe Chapter has nearly 2,000 members in Nevada and Eastern California who are vitally concerned with the quality of public land management in the Egan Resource Area. The public lands committee has considerable expertise in its review as it has reviewed all previous grazing EISs produced in Nevada and Sierra Club members have participated in local planning groups and BLM advisory councils when permitted by the national administrations.

I was very disappointed with the Egan RMP/EIS as it proposes no real solution to very serious public land management problems in the Egan RA, except categorization of allotments into M, I, and C and extensive and expensive vegetation conversions which primarily benefit livestock. There is extremely limited reference to reducing or eliminating livestock overgrazing or even to improving the ecological condition of the vegetation, which would actually benefit wildlife and wild horses, improve watershed, recreational, wilderness, and all other non-commodity values, in addition to livestock operations.

Nowhere does FLPMA or PRLA state the overall goal of public land management is "to improve the resources of the resource area which would result in increased goods and services to the public lands users and general public." (p.11) A less commodity oriented goal which would comply with the stated intentions of Congress would be "to improve and maintain public rangelands to good or better ecological condition." An objective to reach this goal would be "to reduce overgrazing by adjusting livestock numbers to the carrying capacity of the range and developing grazing systems which comply with the principle of sustained yield, a legal requirement of BLM operations.

Any vegetation conversion projects should be considered only after grazing management has been implemented, not in substitution for a grazing system. When ADMS increase due to improved grazing management, they should be used to make up for the BLM-estimated forage deficiency in over 98% of the RA, not be

*To explore, enjoy, and protect the natural resources...*

used to justify increases in livestock numbers, as the EIS implies. And why is fire as overproposed as a conversion technique? There is no justification given for the purported improvement in wildlife habitat by extensive burning. In fact, most wildlife professionals oppose a "let-burn" philosophy, especially when an increase in livestock forage production is the BLM goal.

Not enough emphasis is given to the use of other standard range management practices, such as the setting of utilization levels of vegetation, especially that important to wildlife, nor to maintaining a credible and functioning monitoring program. In fact, we are very concerned that monitoring in the Egan RA will be used to justify additional range improvements to bring forage up to and beyond existing (over) stocking rates, not to adjust livestock numbers to the carrying capacity of the public rangelands. We would have little confidence in such monitoring data.

In addition, adjusting seasons-of-use does not appear to be under consideration for use in the Egan RA. The EIS is fuzzy on how many ADMS will be developed for the 98 allotments without grazing management and when. No range improvements should be even considered unless they are a part of a comprehensive AMP.

It is totally unacceptable to the public concerned with proper range management and the correction of historic abuses of livestock overgrazing for BLM to propose in most of its alternatives to license livestock use at the 3 year average levels or higher when the EIS acknowledges extensive overgrazing, i.e. "forage demand is far greater than forage production" (p.20), although estimates of acreage in poor, fair, good, and excellent condition are never made. Instead, statements on range condition and carrying capacity are prefaced by "professional judgement and preliminary data from monitoring studies indicate." Doesn't BLM even know the condition of the rangeland it is supposed to be managing? What is the "preliminary data"? If BLM does not know range conditions or carrying capacity, then on what legitimate basis is the agency permitting any livestock use of the public lands?

The EIS appears to be written to obfuscate the actual poor conditions of the public land. The use of "percent acres in desired successional stages" instead of poor, fair, good, and excellent is ridiculous. The use of "percent acres in doublepeak in 1984, which has arrived! It is not even clear that if the Egan RA successional stages occur as desired that the public rangelands will be in satisfactory condition. It appears that BLM is using this language to confuse the public and to be thus relieved of accountability for poor management.

Categorizing allotments into M, I, and C is an action designed to convince the public that something is being done about livestock overgrazing. Categorizing is a paper exercise, which on its face is ridiculous. Putting 76 allotments into M & C categories (i.e., do nothing) when BLM admits that over 98% of the Egan RA

COMMENT LETTER 25

is overgrazed, riparian areas are being systematically destroyed, only 5 allotments have AMPs, etc., is a callous disregard of BLMs public land management responsibilities.

1 Wilderness was handled with more consideration. We support an increase to the Preferred Alternative for the Goshute Canyon WSA to 29,000 acres. Its wilderness and numerous other natural values make it an outstanding addition to the National Wilderness system. We support the Wilderness Emphasis Alternative for the South Egan Range WSA of 58,000 acres. The unique white fir forests, the Hardy bristlecone, the limestone caves, the 2 important raptor sites as well as its solitude and outstanding opportunities for primitive recreation qualify the WSA as wilderness. The 47,000 acre Preferred Alternative recommendation for the Park Range is very good. We support it especially given the pristine meadows which should be used as a comparison for excellent ecological condition. We support the 46,000 acre 3 Wilderness Alternative recommendation for the Jordan's Well WSA. Resource conflicts are minimal and wilderness values are extremely high in this rugged area.

We have several other general complaints about the planning process in the Egan RA. While the RMP/EIS states (p.11) that RMPs are designed to make maximum use of the best available data in formulating and analyzing alternatives," the document never states what data is available. Have range surveys been conducted? When was monitoring initiated in the Egan RA? What kind of monitoring has occurred, where, and for how long? How is this data actually used?

The lack of specificity in the Egan RMP/EIS leads this reviewer to conclude that this EIS is pragmatic and will not meet a court test of its adequacy.

The Sierra Club is also concerned about the lack of identification of Areas of Critical Environmental Concern in the Egan RA. It is inconceivable that in 3.8 million acres, the BLM can find no ACECs. It is well known that the Egan RA has critical wildlife habitat, including habitat for rare and endangered species, bristlecone pine areas, significant archeological and cultural sites, and other scenic and geological areas of public interest. The RMP and EIS is quite deficient in complying with its own regulations on ACECs.

We are very interested in the principle articulated on p.15 regarding OWV designation. The RMP states "An undefined 'potential' for off-road vehicle use damage is not adequate justification for constraints on off-road vehicle use." Does this principle also apply to land disposal, i.e., "an undefined or non-specified 'potential' for disposal of public lands is not adequate justification for BLM proposed disposals in the Egan RA?" Does this principle apply to wilderness designation, i.e., "an undefined or non-specified 'potential' for minerals in a WSA is not adequate justification for BLM proposed negative recommendations for wilderness designation or the elimination of

RESPONSE TO COMMENT LETTER 25

large areas of WSAs due to 'mineral conflicts'?" BLM should try to be consistent!

We object to the handling of "mineral resources management" (on p.15). Doesn't the BLM have some regulations regarding the minimization of negative environmental impacts of mining exploration and development or at least some requirements for minimal reclamation of disturbed areas? If so, environmental protection from disturbances from mineral development should be a part of the Egan RMP.

The treatment of the destruction of riparian areas by unmanaged livestock and BLM actions proposed to correct this problem are very superficial. Is not BLM specifically mandated to protect riparian areas and manage them in good or better condition? If so, the proposed alternatives are deficient.

A particularly obtuse statement on p.23 requires clarification. What is meant by "All vegetation will be managed for those successional stages which would best meet the objectives of this alternative"? The paragraph was truncated by a misplaced paragraph 5 before it could reveal which Appendix attempted to quantify this obtusity. Although the Preferred Alternative is supposed to be balanced, the management actions described appear to almost exclusively benefit livestock; therefore, does this unclear statement mean that the vegetation will be managed to benefit livestock?

The acreage proposed for disposal is totally unacceptable. No justification was given for how the disposal of 86,000 acres is in the public interest, nor even of who is requesting such massive land disposals. The law provides for reasonable disposals for community expansion and other public purposes and for small unmanageable parcels, not for thousands of acres which apparently will benefit private individuals, not the public.

In general, we support Alternative B, but feel it is a feeble effort in an overall inadequate plan to balance land management among all the multiple uses. We have no idea if livestock levels of 75% of 3-year average use is adequate or not. Are 92,000 AUMs within the carrying capacity of the range?

The other alternatives are obviously inadequate. We do commend BLM for including a NEPA-mandated no grazing alternative, but the general non-specificity of this EIS practically negates the usefulness of using the no-grazing alternative for base-line comparisons. Why is the requirement for a benefit-cost ratio of 1:0 for range improvement projects only mentioned in one alternative? Does this requirement not apply to projects in all alternatives? Or does BLM propose to fund range improvements in which costs exceed benefits?

According to information obtained from the Nevada Department of Wildlife, there are inaccuracies or substantive disagreements on the categorization of 29 allotments into M or C categories. We

## COMMENT LETTER 25

support DoW recommendations for all the 2# allotments to be put into the I category.

The Egan RNP/EIS is one of the most poorly written documents I have yet reviewed. Substantively, it is inadequate, leading me to believe that the BLM does not know much about the Egan RA, its problems, or their solutions or that the Bureau is not courageous enough to honestly describe the problems nor take the necessary corrective actions. I hope and trust that this "plan" will be rewritten when reason is restored to public land management in this country.

Thank you for considering my comments.

Sincerely,

  
Rose Strickland, Chair  
Public Lands Committee of the Tolyabe Chapter of the Sierra Club

## RESPONSE TO COMMENT LETTER 25

### Response Number 1

Your preference for a 29,000-acre alternative for the Goshute Canyon WSA has been noted. The BLM determined the four alternatives analyzed were sufficient to adequately address the environmental impacts.

### Response Number 2

Your support for the 58,000-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions; raptor habitat; and many opportunities for recreation. The area will be given special attention for possible recreational developments and will be managed in a manner to preserve these special values.

### Response Number 3

Your preference for the 46,000-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.



## WHITE PINE SPORTSMEN

Nevado Wildlife Federation - Member

P. O. BOX 1187

ELY, NEVADA



December 29, 1983

Bureau of Land Management  
SR 5 Box 1  
Ely, Nevada 89301

Attention: Merrill L. DeSpain

Subject: Comments on Egan Draft Resource Management Plan

Our primary interests are wildlife and recreational use of the land.

Our most serious concerns for wildlife are: 1) present overpopulation of wildhorses, 2) almost no habitat improvement for wildlife.

The wildhorse overpopulation problem is severe in the Buck-Said Mountains and Long Valley areas for mule deer. These areas are winter range for our mule deer and the habitat is being ruined. Since the U.S. Congress resists efforts to legally and rapidly reduce the impact of these wildhorses, the problem drifts year after year. We deplore the lack of action by U.S. Government agencies and the U.S. Congress. We don't see how you can have an effective, long range "Egan RMP" without this problem being addressed in total.

- 1 Our concerns for recreational use of RMP land is that the citizens of Nevada will have the same access to all RMP public lands after the RMP is implemented as before. There are literally hundreds of four wheel drive roadways existing that do not show up on official maps. If they aren't considered a maintained roadway, they are defined as not existing. If these wilderness areas are created, a great deal of access will be lost to older and physically impaired citizens. We applaud the principle of setting aside some of our public lands for wilderness. Our great basin valleys also have many unique wildlife, plant, and scenic features, but they aren't included in wilderness areas. The mountain ranges that are included are so narrow that they would make only marginal wilderness areas at best.

- 2
- 3
- 4 The "Preferred Alternative" is flawed from our point of view. In several areas: 1) wildhorse populations aren't being reduced, 2) nearly 1/3 of total proposed wilderness study area acreage is included which has substantial negative impact on mining.

We do not support the "Preferred Alternative" nor "Alternative A through E" as written.

*Bob Marcum*  
Bob Marcum, President

*Robert E. Hollinger*  
Bob Hollinger, Secretary

Response Number 1

A great deal of effort was expended during the wilderness inventory to identify all roads and ways in the wilderness inventory units. Field reconnaissance included fixed wing and helicopter (use and extensive ground work. Several formal comment periods were held to acquire from the public specific information about manmade imprints in the areas. Identified roads and noticeable ways would not be closed.

Response Number 2

All existing access would remain open in the areas recommended suitable in the Egan Resource Area. The aged and infirm would not be denied the ability to travel anywhere that they are now able to visit.

Several commentors of advanced years have presented an opposing view, stating that they continue to enjoy large unroaded areas in spite of their senior status. Handicapped persons have often experienced the exhilaration of overcoming the challenge of the wild.

Response Number 3

None of the valley areas by themselves qualified as WSA's during the wilderness inventory, however, most of the WSA's include roadless valley portions associated with the mountain ranges. The BLM recognizes the special and unique features of our valley areas. The mountain ranges in the Great Basin are by nature not as expansive as those found in other areas. Those identified as WSA's, however, were found to possess the wilderness criteria specified by Congress.

Response Number 4

Your lack of support for any of the alternatives has been noted.



# THE WILDERNESS SOCIETY

FOUNDED IN 1935

Merrill L. DeSpain  
District Manager  
SR 5 Box 1  
Ely, NV 89301

December 14, 1983

Dear Mr. DeSpain,

The Wilderness Society is pleased with this opportunity to respond to the Draft Environment Impact Statement for the Egan District. Although we endorse the areas recommended for wilderness, we believe these recommendations should be expanded and added to.

Park Range: We fully commend and endorse wilderness designation for the 46,831 acres recommended in the DEIS.

Jordan's Well: The BLM report notes that this area has excellent wilderness qualifications: "...a very natural condition...opportunities for solitude are outstanding...good opportunities for hiking (etc.)." It is within 5 hours driving from a major population center, is an important raptor habitat, and contains many different wildlife and vegetation species. Significant man-made intrusions have already been eliminated from the wilderness boundaries, and the mineral potential does not appear to be truly substantial. Therefore, we urge an increased wilderness designation of 45,791 acres.

South Egan Range: This area has excellent wilderness qualities. Among them -- in addition to the opportunities for recreation, solitude, and high degree of naturalness cited by the BLM -- are raptor nests, deer habitat, ancient bristlecone pines, and unique white fir forests. The area is within 5 hours drive from a major population center, and artificial impacts are insignificant. We urge a wilderness designation of 57,560.

Goshute Canyon: In view of the extremely high wilderness values in the Canyon, we urge an increase of 6,375 acres over the BLM recommendation. This would restore the area dropped due to mineral potential and increase protection for the rare spotted bats, trout habitat, bristlecone pine, and aboriginal site. It would also preserve the area for the many forms of primitive recreation, the naturalness of the area, the opportunities for solitude, and the outstanding scenery. We urge a recommendation of 28,600 acres.

278 POST STREET, #400, SAN FRANCISCO, CA 94108

(415) 982-2075

2776

Mr. Merrill L. DeSpain  
December 14, 1983  
Page Two

Two issues in particular concern us deeply about the DEIS and Management Plan. The mineral studies conducted by the BLM seem specious, since they rely on the "needle biopsy" method. Since analysis of these samples is not tied to the marketability or strategic reserve value of the minerals, this process appears to be used mainly to discredit wilderness potential in WSAs. It is important, for a fair and reasonable minerals assessment, to carry out sampling for proven resources in surrounding lands as well as the WSAs. A Resource Area-wide analysis is the only way to determine if mineral potential on a WSA is so much greater than the potential on non-WSA lands that wilderness values are out-weighted.

Our second concern is with the realty management section of the preferred alternative. We oppose disposing of large blocks of public land to the private sector, especially when the eventual use of this land is so unclear. Since attempts to make these lands commercially and economically productive have so often been ineffective and have exacted great cost from the government and the private investor, we would like to see this program discontinued.

Sincerely,

Patricia Hedge  
Regional Director, California-Nevada

RESPONSE TO COMMENT LETTER 27

Response Number 1

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.

Response Number 2

Your support for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

Your preference for a 28,600-acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.

Response Number 4

The Bureau of Land Management began with a macroscopic examination of geologic settings and inferred geologic processes, then considered more area-specific information about past mining, mining claim and lease location, and known mineral deposition. In certain instances, actual assay information is available. In all of these efforts, there is consideration of the economic conditions affecting possible development of potential of resources. There is also, as required, consideration of impacts to the national effort to develop and stockpile critical and strategic minerals.

Resource area-wide surveys are desirable for conducting wilderness studies, but in the case of the Egan studies were impossible to attain because of funding and timeframes. (They have been available for other studies, such as those for the Schell Resource Area in the Ely District.) There is nonetheless some implicit judgment about the relative abundance of outside opportunities in the selection of the proposed actions and in the statements about its impacts on energy and minerals.

COMMENT LETTER 28

1 | The undersigned are totally opposed to ANY form of Wilderness designation to be made by the BLM within the Egan District of Eastern Nevada.

We appreciate any and all help you can give on our behalf before December 30, 1983.

1. Marcella Kennedy 1927 G. St. Sparks N.
2. John [unclear] 8524 [unclear] Hwy #13
3. John a [unclear] 1408 [unclear] Sparks NV
4. Charles [unclear] 4765 [unclear] Reno
5. [unclear] 4265 [unclear] Forest P Sparks N.
6. [unclear] 435 [unclear] Reno NV
7. Samuel [unclear] 5874 [unclear] Reno
8. [unclear] 7874 [unclear] Reno
9. London [unclear] 734 [unclear] Hawthorn
10. Tom [unclear] " "
11. John Clark 275 Diamond Circle Egan Valley Nev
12. Rubin [unclear] Box 304 856 [unclear] OR
13. Bob Nolec Box 262 Lee Valley Ca
14. \_\_\_\_\_
15. \_\_\_\_\_
16. \_\_\_\_\_

Several of these petitions were received with a total of 119 signatures.

21. \_\_\_\_\_
22. \_\_\_\_\_
23. \_\_\_\_\_
24. \_\_\_\_\_
25. \_\_\_\_\_
26. \_\_\_\_\_
27. \_\_\_\_\_

RESPONSE TO COMMENT LETTER 28

Response Number 1

Your opposition to wilderness has been noted.

COMMENT LETTER 29

12-22-53

Gentlemen:

1 I feel all ~~interests~~ <sup>press</sup> under  
consideration or wilderness in  
Egon District to be unsuitable.

W. H. King  
WS12003  
Reno W57510

RESPONSE TO COMMENT LETTER 29

Response Number 1

Your opposition to wilderness has been noted.

242

COMMENT LETTER 30

December 19, 1983

Merrill DeSpain  
BLM District Manager  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Sir:

Should the Liberty Bell be sold for scrap metal?  
Should the Yosemite Valley be flooded by a reservoir?  
Of course not. These are national treasures.

Likewise, the few remaining unspoiled, unscared  
areas of our state are also national treasures that  
must be protected for our future generations.

I support all the recommended wilderness areas in  
your district. Having visited the Egan and Park  
ranges, I am particularly pleased that we have the  
opportunity to save these beautiful mountains from  
the kind of despoliation seen in so many other of  
Nevada's beautiful areas.

Let us protect these few remaining unspoiled areas  
in Nevada by designating them wilderness areas.

With best regards,

*Brent Boyer*

Brent Boyer  
P.O. Box 414  
Reno, Nevada 89504

RESPONSE TO COMMENT LETTER 30

Response Number 1

Your support for wilderness has been noted.

COMMENT LETTER 31

Dear Mr. Dolpin,  
I wish to comment on the BLM Wilderness  
Review of the Big Ducts Open Resource  
Area. I want you to know that I support  
the proposal prepared by the Nevada  
environmental groups coalition. I believe  
that this proposal will preserve the most  
beautiful and significant BLM lands.  
Thank you.  
Sincerely,  
D.P. Boyson



Response Number 1

Your support for the Nevada environmental groups coalition proposal has been noted.

12-20-83

To Merrill L. Despain:

I don't really have the time to go page by page in the EIS Egan Range. But I do have a few comments.

1. I don't want to lose any quans in the course of the EIS because of outside influence.  
2. I don't want wilderness area to hinder this area.

3. On page 181. Rock canyon management goal is C which means that all that is going to be done is being done. In fact Rock Canyon area has 3 sub-ranges which are all excellent places to put in a reservoir. There is nothing there but black brush and I know that crossed wheat is more productive. This needs to be reclassified to could improve.

4. The North Cave says the trend is down. The trend since Five Brown around 80yrs is on the improve and the old timers will infer that fact. The cattle come off this allotment after the winter fat.

5. The cattle camp allotment trend is downward. This is not true. There is more food over there than there has ever been. The cattle come off this <sup>summer</sup> range fat.

The studies I think are taken near the roads and water holes and don't represent the range as a whole.

6. All of my allotments would be ~~for~~ favorable to improvements of some kind. Sacramen. Big Six NorthCave + Dec Gov Spring is a should not be cut out of that classification!!!

To Merrill L. DeSpain:

1. I am opposed to the designation of South Egan Range as a wilderness area. Because
1. The Rock Canyon allotment is 41% in this area. There is a high potential for development of this grazing resource and if made into a wilderness area would make improvements prohibitive. I drive my pickup & equipment out into this area all the time and there are roads all over it.
2. Our drive trails are in this wilderness area. Maintenance of these trails are essential.
3. Our summer range is in the cattle camp allotment. There are no wilderness characteristics out in the grazing allotments. Also <sup>improvements</sup> would become impossible.
4. The reports say there are a lot of wild hells in the area, but I have never seen any more than a jack rabbit or badger.
5. It states on page 94 that there will be no curtailment of grazing rights but if water developments realigning and I can't get to the project and become uncommitted to repair, grazing will be curtailed for that area.
4. Page 97 says there will be increase cost of operation in a regulatory constraint.
7. We don't need more federal control we need less. Multiple use is the way we need to handle. Historic use of wood and tree products is a way of life and will not & should not be changed. The top of the mountain has wilderness characteristics and will never change regardless of the designation.
3. On page 99 it says that there will be a loss of additional forage due to the preclusion of some vegetation manipulation projects. It also goes on to say that there will be restrictions on range improvement projects we need less restrictions.

9. In firing this area would almost be impossible. There would be a lot of undue harassment to citizens of this area who have always got wood and Christmas trees out of there and always will continue (pg 105). This will cause a Socialistic Police State.
10. On page 106 it says maintenance of the chimney & sending would be allowed be cast could be higher than a non wilderness area. I'm opposed to this.
11. Page 106 No new range developments have been prepared. Rock canyon area has some of the greatest potential for ~~recreation~~ and resource development. I should not be cut out because of some wilderness area.

I strongly oppose making the South Egan Range a wilderness area or any other for that fact. The numerous camp letters that exist, the people don't know what the country is like and should have little influence on the decision. There is enough areas for selection for all. We don't have to protect these areas from ourselves.

Thank you for your consideration

Steven Carter  
65W Northland Rd  
Lund, Nevada  
89317

RESPONSE TO COMMENT LETTER 32

Response Number 1

Your preference for the Preferred Alternative in the draft document for the South Egan Range has been noted.

Response Number 2

No access would be closed even if this area were designated wilderness, since existing roads would be left open to vehicle travel.

Response Number 3

The BLM's Wilderness Management Policy states that "maintenance of existing necessary rangeland improvements may be allowed to continue" (111.H.e.1.). Mitigation requirements would not entail unreasonable costs.

Response Number 4

The statements on page 97 and 106 of the draft RMP refers to new range improvements developed after designation. The same statement says that "cost increases will be within reason."

Response Number 5

The problems of managing the area as wilderness are partly responsible for the development of the Preferred Alternative.

Response Number 6

Page 106 in the Egan Technical Report does state there are no range improvements proposed. During the allotment categorization process, the Rock Canyon Allotment was designated as a "C" allotment. Funding of rangeland improvements will first be emphasized in "I" category allotments. As the funding is limited, "B" and "C" allotments would be scheduled for few, if any projects. This is unrelated to the wilderness study area.

N  
B  
O

COMMENT LETTER 33

4475 Brindere Lt  
San Diego, CA 92107  
November 21, 1983

Merrill DeSpain, City District Manager  
Bureau of Land Management  
Dear Sir,

The Egan Resource Area has some fine areas suitable, in my opinion, for wilderness protection. For one, Blakely Canyon WSA would be a valuable 28,600 acre wilderness. It has Goshute Cave Biological Area for the spelunkers I comment the BLM for recommending Park Range WSA for a 46,231 acre wilderness. Its virgin grasslands and meadows and cliffs make it very desirable. I am pleased too, that the BLM has found the Rimdon Well WSA suitable for a 37,544 acre wilderness. This area is important as a bird raptor location. South Egan Range WSA has not been recommended for wilderness protection but I feel it should be because it provides and it protects birds of prey as does the Rimdon Well WSA.

Sincerely,  
Marguerite Christoph

RESPONSE TO COMMENT LETTER 33

Response Number 1

Your preference for a 28,600 acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.

Response Number 2

Your support for the Preferred Alternative in the draft document for the Park Range and the Riordan's Well WSAs has been noted. Your support for wilderness designation for the South Egan Range WSA has also been noted.

247

COMMENT LETTER 34

816 Lillis  
N. Las Vegas NV 89030  
December 26, 1983

Merrill DeSpain  
District Manager  
Star Route 5  
Box 1  
Ely, NV 89803

Dear Mr. DeSpain:

I realize that the deadline for letters regarding the wilderness recommendations for the Egan Resource Area was the 24th, but I hope this letter will still be considered. With Christmas and all, I just didn't manage to write it any sooner.

I would like to compliment the Bureau of Land Management for its Preferred Alternative. I believe that you acted sincerely in evaluating the potentials for wilderness. The Egan Area contains great potential for wilderness. However, I feel that certain additions are necessary in order to best evaluate this area.

1 First, in the Goshute Canyon area, it is important to combine the Preferred Alternative and the Wilderness Emphasis Alternative. This area is extremely valuable for wilderness, especially because of its bristlecone pine and aboriginal site. In addition, it has extremely important wildlife values--both "ordinary" wildlife such as deer and elk, as well as rare wildlife such as rare spotted bats and Utah Cutthroat trout. The area is extremely important to hikers, photographers, cavers, and backpackers. Although there were mineral conflicts in the southern part of the WSA, these have been eliminated, so there is no reason not to preserve as much land as possible in this area as wilderness.

2 I would also recommend you propose the South Egan Range as wilderness. This area would be a unique addition to the wilderness system because of its limestone cliffs and white fir forests. Furthermore, it also offers much habitat for raptors and deer.

I would very much applaud your recommendation for the Park Range. You have recognized the lack of resource conflicts and the excellent opportunities for wilderness experience in this range.

3 Finally, I would recommend you greatly enlarge your recommended wilderness for Riordan's Well. It is important to complete the wilderness recommendation in this area, between the Forest Service recommended wilderness and the proposed Blue Eagle Mountain wilderness. Again, there are few mineral or other conflicts in this area.

As I stated above, I hope this letter is not too late to help urge you to consider expanded wilderness proposals. The Egan

COMMENT LETTER 34

Resource District is an important wilderness resource for residents throughout the state of Nevada. Even if all the above areas were included in a wilderness proposal, less than 5 per cent of the Resource Area would be proposed for wilderness.

Sincerely,

*Cheri Cinkoske*

Cheri Cinkoske

RESPONSE TO COMMENT LETTER 34

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM feels that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.

Response Number 2

Your support for wilderness for the South Egan and Park Range WSAs has been noted.

Response Number 3

Your support for an enlarged recommendation has been noted. The most important values in the Riordan's Well WSA, including the scenic areas, raptor habitat, and ponderosa pine, are contained within the BLM's suitable recommendation for the area. This suitable portion still forms an integral component of the Great Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II area.

## COMMENT LETTER 35

2955 DeSoto  
Cleveland Heights OH 44118

January 13, 1914

Mr. Merrill DeSpain  
District Manager  
U.S. Bureau of Land Management  
SR 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

I must apologize for the lateness of this comment. However, I feel that there are definite extenuating circumstances. I requested the Ely EIS, RMP, and Wilderness Technical Report (WTR) on December 14 and it was mailed from Ely that day. It was not delivered to me until December 27 and already after the due date. It was not sent PRIORITY mail. The Lahontan EIS, RMP and WTR were requested on December 13. These were sent PRIORITY mail and arrived on the 15th.

Technically, you can throw the attached comment away, disregard it, or not even read it, but you are not obliged to do so. You can also still accept it and I hope that you will.

I feel that I am uniquely qualified to comment on the issue of wilderness in northern Nevada as I am a member of every responding special interest group except ranching. I am a professional geologist with a Master's degree in geology and work experience with the U.S.G.S. (field mapping); Hanna Mining Co. (base and precious metal exploration); Humboldt Oil and Refining Co., now Exxon (geophysical). I have also been president of my own mining company, Phoenix Mineral and Mining Associates, for ten years. That company successfully carried out precious opal mining operations at Virgin Valley, Humboldt Co., Nevada, for two years as well as base and precious metal exploration and property evaluation in Nevada, Alaska, and elsewhere. During the opal mining operation we had the largest mining operation in Humboldt County according to the Nevada Bureau of Mines. I feel that I am familiar with much of northern Nevada because of these activities.

Presently I am Curator of Mineralogy at the Cleveland Museum of Natural History and consider myself a conservationist. I also do considerable field collecting of rocks and minerals and am deeply involved with regional and national rock-hound organizations. I have two bad knees which prohibit extensive field work so I cherish my ability to drive my car like an RV into the most outlandish areas. (I've gone farther than some motorcycles and pulled jumps out of bays.) I am an Eagle Scout (1958) and have enjoyed primitive camping in the West since 1956.

## COMMENT LETTER 35

In addition, my parents had three lots on Assateague Island which were taken by the U.S. government for the National Seashore there with what I still consider to be woefully inadequate compensation. There is absolutely no question, however, that the area has been put to a much better use as a National Seashore than had it been developed in cottages. I thoroughly enjoyed my subsequent visit there.

Possibly I have written far too much about myself but I am going to propose some things for which I thought it best to state my qualifications. The most important is that I love northern Nevada very much and would consider it an honor to live there. Virtually everyone I spoke with in the area also cherishes the place, but most, in fact, are so familiar with it that they do not appreciate the uniqueness of the environment in which they live. In time, I think that they and their children will thank you for saving some portion in a degree of wilderness. The designation of wilderness areas seeks to preserve exactly those elements of the environment that we all cherish, whether we be ranchers, miners, rockhounds, or "conservationists" (whoever they are).

Finally, I would like to especially thank those who prepared the Wilderness Technical Report and Environmental Impact Statement. They have provided concerned persons of all persuasions the facts with which to make informed comment. It is deeply appreciated. I hope that my comments are received by them as an extension of the same theme -- that all of us are trying to find the most suitable use for some unique lands that we all cherish. I would like to receive any comments from BLM or others regarding this comment. I also wish to be kept informed of all matters relating to BLM actions on wilderness in the Ely District.

Sincerely,



Paul C. Clifford



## COMMENTS ON EGAN DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT AND SUPPORTING EGAN WILDERNESS TECHNICAL REPORT

## The Wilderness Study Areas (WSAs) of Interest are:

Goshute Canyon (NV-040-015)  
Park Range (NV-040-154)  
Riordan's Well (NV-040-164)  
South Egan Range (NV-040-168)

Comments pertaining to all four WSAs

All four of the areas under consideration have been designated Wilderness Study Areas (WSAs). Under the Wilderness Act of 1964 and Federal Lands Policy and Management Act (FLPMA) of 1976, Section 603, these areas are to be managed under an Interim Management Plan (IMP) which essentially treats them as wilderness areas until Congress designates each area a Wilderness Area or returns the specific area to general multiple use. As a WSA each area has been found to be suitable as wilderness under the Wilderness Intensive Inventory. To delete an entire area or portion of an area from recommendation to Congress there must exist a documented and clearly overriding resource or management conflict. They must be settled in favor of wilderness designation. These areas without a documented significant conflict must be recommended as suitable. This comment will focus on conflicts cited by BLM for reductions of acreages suitable for recommendation to Congress for Wilderness Designation.

Size, naturalness, and outstanding opportunities for solitude or primitive recreation are mandatory wilderness characteristics which are splendidly met by all four WSAs. Special features, multiple resource benefits, and diversity in the National Wilderness Inventory are additional (supplemental), highly valued, but not mandatory wilderness characteristics.

It is also my understanding that decisions in California RARE II disputes as applied to WSAs and Interior Board of Land Appeals decisions in Utah and Arizona mandate that only man-generated imprints arising within a WSA are to be considered. Imprints such as noise and view impairment arising outside the area are not to be considered. Minor imprints such as range improvements do not disqualify an area.

Wilderness Study Policy and Planning Criteria Quality Standard 4 states: "In determining whether an area is suitable or unsuitable for wilderness designation, the BLM wilderness study process will consider comments received from interested and affected publics at all levels: local, state, regional, and national. Wilderness recommendations will not be based exclusively on a vote counting majority rule system. The bureau will develop its recommendations by considering public comment in conjunction with its analysis of a wilderness study area's multiple resource, social, and economic values and uses." This clearly says that the recommendation isn't a beauty contest. Informed public comment pertinent to the issues of analysis will be considered by the BLM. Yet at the end of the presentation of each alternative there is a section under Special Conditions anticipating the local and nonlocal responses to the alternative. This is very troubling, because it seeks a political solution to what is basically a technical process, namely determining suitability of all or part of a WSA for designation as wilderness.

This is painfully obvious in the case of wilderness designation. The severe changes made in the Preferred Alternative (as opposed to the balanced approach put forward in the Mid Range Alternative "C") regarding wilderness have been brought forward, without BLM comment or justification, apparently to placate certain segments of the local community. According to Wilderness Study Policy and Planning Criteria, each quality standard will be "fully considered and documented" in determining recommendation as suitable or unsuitable.

As BLM chose to include the wilderness considerations with the RMP they must still justify (document) why the preferred alternative is better, particularly since it is so different from the Mid Range Alternative. As such the EIS is severely if not fatally flawed as regards wilderness designation recommendation.

It is critical to accurately evaluate potential resource or management conflicts to determine the ultimate suitability of each individual WSA. The Egan Wilderness Technical Report (WTR) is generally an excellent document setting forth well the facts necessary to make proper decisions. The most important differences of opinion are the valuation of mineral potential and the consistent introduction of outside imprints which should not be considered (see above).

While the technical report is generally excellent, I have major difficulties with some evaluations of that report contained in the Egan Draft Resource Management Plan and Environmental Impact Statement (EIS), most specifically with regard to mineral potential, BLM management conflict concerns with off-road vehicle (ORV) use, and perception of wilderness value.

The conflict with ORV use is a real one. Northern Nevada is one of the most sparsely populated areas in the entire country. Most people would consider this as solitude even without a wilderness title. Yet, for about 140 years people have driven their wagons, trains, cars, trucks and ORVs hither and thither until even here some 87% of the Resource area is unsuitable for wilderness designation. The stereotyped Nevadan is extremely independent and will "drive" (go) there he pleases. In recognition of this the BLM has removed as much area literally accessible to ORV users as possible from its preferred and wilderness emphasis recommendations. The only difficulty with this defensive approach is that new generations of ORVs are continually becoming available and even now I suspect there is virtually no area absolutely inaccessible to ORVs.

Additionally, some WSAs are severely reduced in size or eliminated altogether by the removal of areas accessible to ORVs. Fortunately, Nevadans are also very law-abiding people with a well-developed sense of social justice. They don't like government interference by laws but usually they will comply with them, particularly if they are viewed as reasonable. I think, in time, more and more Nevadans will recognize that the use of land as wilderness is reasonable.

But what should the BLM do in the meantime? First, one needs to look at the scale of the potential problem. The EIS (p. 93) states: "Current off-road vehicle (ORV) use within the area is generally restricted, by user choice, to existing roads and trails. Topography, terrain and vegetation effectively eliminate ORV use on much of the area. In addition, the existing roads and trails provide access to many backcountry areas and the roads and trails provide the variety of challenge sought by many

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3 enthusiastically. ORV use is low in comparison to the size of the area. Use is estimated at 8,000 visitor hours per year. Little damage is known to be occurring from the current levels of use or from the current use patterns. Therefore, it is assumed that there are currently no significant impacts from off-road vehicle use within the Egan Resource Area.

The EIS (p. 15) also states:

"Public lands within the Resource Area may be designated either open, limited or closed to off-road vehicle use. Constraints on off-road vehicle use need to be based on identifiable and defendable concerns. An undefined "potential" for off-road vehicle use damage is not adequate justification for constraints on off-road vehicle use. Damage must be shown to be occurring or imminent".

This is a very sensible approach and extends very well to ORV management in wilderness areas and basically translates "We don't have a problem we cannot document. We will not solve problems we do not have". In terms of management of ORVs no problem has been documented despite a concerted effort to define ORV use as a problem. Therefore ORV use by current patterns (see above) does not pose a significant management problem in the MSAs.

4 BLM is required at present to manage all MSAs to preserve wilderness values under existing IMPS. Management is an active endeavor according to my dictionary and involves manipulation to achieve the desired goals. Removing all substantial parts of a MSA based on potential illegal vehicle trespass on a scale so trivial as described above is not management of wilderness but active abetting of the destruction of it which is forbidden by the IMP. As such, these reductions in size are themselves illegal except in areas of overwhelming impact. These exceptions are very, very rare in the 4 MSAs.

I feel that the best defined boundaries on the ground are existing roads and fence lines. Conspicuous signs can be placed when entering, leaving, or adjoining a MSA. Perforic signs along the boundary roads and at critical logical entry points should be sufficient to inform the public of the presence of a wilderness area. I think that you will get a reasonable compliance as a result of such postings. Boundary effects are always present in any physical system. They must be accepted, tolerated, but not condoned. It is therefore best to site the boundaries such that the boundary effects do not affect core wilderness values i.e. at the side of the boundary road. Determined ORV trespassers will ignore or destroy any other boundary device anyway, including topographic barriers.

The real problem then is what to do with the deliberate ORV trespasser. I would suggest that fines for first time offenders be up to \$100; second offense, mandatory \$500; and third offense, mandatory \$1000 and confiscation of vehicle. The BLM contends that it does not have or anticipate sufficient manpower to police such regulations regardless of desirability or willingness. I would therefore recommend that responsible local people (probably ranchers) be deputized to enforce these rules and that the arresting officer (if deputy or citizen) receive 75% of any fine collected. The BLM should receive the other 25% or 100% if its own personnel make the arrest. Such a system would generate a strong incentive for enforcing compliance from local citizens. The economic gains to the local community from such a revenue source would far offset any adverse economic impact due to designation of any of the MSAs as a wilderness if the ORV problem is as serious as BLM contends.

A second problem involves the evaluation of portions of the MSAs for

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5 potential mineral production. There appears to be a mixture of terminology in the MTR and EIS between "high-moderate-low" potential which I associate with the "Classification and Confidence" scheme used in other BLM EISs and "high-good-speculative-low" as defined in the MTR Glossary. In fact they correlate well: high-high, moderate-good, low-low. The MTR classification has the crucial and mandatory additional classification of "Speculative." I have addressed this "speculative" component in my comments on other wilderness EISs. The mineral potential used in this comment will be as defined in MTR Glossary (p. 144), and recited below:

## MINERALS POTENTIALS:

High Potential - High potential is assigned to areas that contain or are extensions of active or inactive properties which show evidence of ore, mineralization and favorable geologic characteristics. All producing properties fall within this category.

Good Potential - Good potential is assigned to areas with several geologic characteristics indicative of mineralization, relatively lower economic value of past production and similar environments out at greater distances from known ore and mineral occurrences. This category may include areas adjacent to known districts or in mineral belts.

Speculative Potential - Speculative potential is assigned to areas having some favorable geologic parameters and inferences based on geologic models and analogies to known favorable environments. Increasing depth of alluvial cover over areas of potential deposits is also a consideration in this category, except in the case of oil and gas potential.

Low Potential - Low potential is assigned to areas that are outside any constructed favorable geologic and mineral trend projections or are buried by over 1,500 meters of alluvium (except oil and gas).

As defined above, all areas of high potential were excluded during the Wilderness Intensive Survey. No mines presently active or inactive are included in any of the MSAs. The areas assigned a high or moderate value in the MTR or EIS should have a lower classification detailed below.

In fact the potential of all four MSAs to produce ore at a profit is quite low. There are no working mines in any of the four MSAs as far as I know and according to the MTR. Most of these areas lie near or directly in the path of early emigrant trails and have been prospected for the last 140 years. Nothing of any real significance has ever been found within them.

There is a big difference between prospecting and developing a claim. Serious development is hard, expensive work. Prospecting, on the other hand, can be anything from a pleasant diversion to hard work as well. I am not aware of any serious development work or large scale mineral prospecting at the present time in any of the MSAs. Given the strong work ethic of most Nevadans I suspect that for many prospecting is a somewhat more socially acceptable recreation than fishing. Besides there are more mountains than fishing holes in Nevada. The main point is that it is socially acceptable to be "working" at prospecting (rather than fence mending, say) but it is not yet socially acceptable to hike, birdwatch, or do other such silly things. None-the-less, prospecting for many is a means of getting away from the

regular routine under the guise of work. The last thing these people want is to actually find something which would demand or warrant serious development. That would be real work again! But, one does need to file a claim now and again and do the annual assessment work (that no one can find later) so that one's wife and peers will take one's effort seriously and not interfere with one's prospecting "work".

Whether by dint of hard work or pure chance some people do make a valid discovery of mineral wealth. Such fortunate people can stake a valid claim and that claim should be honored. However, the conditions that must be met are pretty strict. First, the claim must be properly located, staked and recorded with both the county and BLM in Nevada. The assessment work must be kept current. And, perhaps most important and least honored, there must be a valid discovery.

A valid discovery of minerals is one "where the evidence is of such a character that a person of ordinary prudence would be justified in the further expenditure of his labor and means, with a reasonable expectation of success, to develop a valuable mine, and where the requirements of the statutes have been met".

There are a number of key words here. Evidence discernible by others rather than hope is required. A prudent person, not a gambler, must assess and be willing to accept the risk of further effort be it labor or money. Remember, the law was written in 1872 and requires either a 10' X 10' X 10' hole or heading or its equivalent or \$100 expended on labor or material directly for the mine. In 1872 holes were drilled with a single or double Jack with some poor fellow holding the drill steel in his hands. One hundred dollars was about equivalent to the average working man's salary for an entire year. This is the kind of commitment required in the original law. Our prudent person must have a reasonable expectation of success in developing a valuable mine, i.e., it must be consistently workable at a profit commensurate with return of investment. It cannot just be a hobby, and the overriding principal value must be the mineral produced not the recreational value of the site. Other case laws have developed that the reasonable return is equivalent to all or a substantial part of a person's annual earnings of today, say \$10,000 profit per year.

Serious prospectors and developers holding claims in these MSAs should demand that they be designated as suitable for wilderness. If they are, then the USGS and USBM are required to do an individual in-depth analysis of each claim to determine its validity. Such an analysis is invaluable to the serious claim holder and anathema to the hobbyists.

There was once (and maybe there still is) a program administered by USBM to aid small mine developers in assessing the potential of their property but giving the U.S. Government an equity position in the potential production. A lot of miners wished to take advantage of this program but it was never really funded and very few were actually helped. Here, anybody with a claim in a MSA gets the same or better for free! If the claim is not found to contain a valid discovery then the serious claim holder would want to cut their losses and drop it anyway. Invalid claims should not affect wilderness considerations.

Additionally if the claims are not filed by December 30, or whenever the designation is made, the free market place has determined that the BLM assessments of moderate and high potential do not economically warrant the

NO  
ON  
NO

expenditure of effort simply to file as the USBM and USGS will have to analyze them for free.

The EIS and Technical Report have been out for some months to tell prospectors where to locate additional claims with a minimum of effort. I suspect that the non-filers are indeed reasonable and prudent people.

Saleable minerals include sand, gravel, and silt. However, these commodities can be made available in sufficient quantity in adjacent areas. The extraction and potential of saleable minerals within the MSAs are insignificant.

A number of geologic factors must be present to create an economic concentration of oil or gas. There must be source rocks, usually marine. These must be buried deeply enough to be gently heated but not so deeply that the oil and gas are subsequently heated to such a degree that they are destroyed. The oil and gas must then be able to move to permeable reservoir rocks which are sealed on top and sides to prevent the escape of the oil or gas. The deposit must then be found and developed.

Oil and gas potential is bimodal in the Egan RA. There is valley fill, and various portions of all four MSAs centered on mountain masses. The geologic history of the region essentially precludes economic concentrations of oil and gas in the mountain masses. The conditions above are simply not met. The mountain masses do not end at the topographic break in slope we now observe, but rather they are bounded by faults which may be some distance, often a mile or more toward the valley from the topographic break in slope. This means that the valley edges generally belong to the geologic province of the mountains and hence have a very low potential for oil and gas production.

The fact that these areas are leased for oil and gas has no significance except to show that the government is very shrewd about such leases. Leases within the lease have high or low potential. Often as much land of low or no potential is added to a lease as the traffic will bear. This happens under the guise of keeping neat boundaries, like township lines, etc. If you want the good you take the bad as well. This has two profitable effects from the government's point of view. First, otherwise unleaseable land is leased at the same rate as higher potential land. Second, acre allotments of the same general size can be leased. Both of these make the leasor (BLM) look very good. The oil and gas leases in all of the MSAs essentially fall into this category and should not be considered further.

An indication that leases do not intrinsically mean any real potential for production is seen in the areas where the same ground is leased for both oil and gas as well as geothermal. The two are essentially mutually exclusive. One may have production of either hydrocarbons or steam from a specific site but not both. Geothermal targets are of two types: 1) deep circulation of water on the major boundary faults mentioned above, and 2) igneous rocks cooling near the surface. The fault type target usually gives low to moderate temperatures presently generally only suitable for space heating or processing. These are found associated with many of the mountain masses throughout the basin and range province so are not unusual. The second type of geothermal target, cooling igneous rocks at shallow depths can give very high "dry" steam temperatures eminently suitable for electrical generation. The only significant geothermal area associated with these MSAs is far from the transportation and social infra-structure necessary to warrant

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putting it to use except for very local space leasing at the isolated ranches. Such use would in no way adversely impact wilderness.

The EIS implies a great adverse economic impact due to wilderness designation due to withdrawal of WSAs from mineral entry. This is totally unwarranted. No larger mines employing a number of people are anticipated in any WSA since overall projections are that there would be no significant changes in area or loss of economies whether designated wilderness or not. One cannot claim an economic loss of a potential resource that has not been identified, quantified, or even staked with a mineral claim.

For example, the Minneruccia FIS(p. 3-9) correctly states that "wilderness designation allows livestock grazing and range developments (except for vegetative manipulation). However, vegetative manipulation is a proposed project and represents potential ADPs of forage not presently used by the operator, therefore, denial of vegetative manipulation cannot be considered a true economic impact to those operators". The economic impact of vegetative manipulation on range value can at least be quantitatively estimated with a fair degree of accuracy. Nevertheless, the impact is a potential one since the BLM is under no obligation to act to manipulate the vegetation. This is directly analogous to the unpatented mining claims and ground not covered by claims before designation. The potential values contained in unvaliated mining claims, and certainly any values associated with all the ground not even claimed, are not being currently used by anyone. Therefore, denial of development of such resources should they even exist harms no one individually since BLM is not obligated to act by staking claims for "parties unknown."

This is not an economic impact but a perceived distortion of individual opportunity which is a sociological impact. Not one unpatented claim in any of the WSAs has been validated. Claims can presumably be staked until Congress designates the area as wilderness. Anyone who can show a valid mineral interest in a valid mineral claim will be permitted to pursue that economic value and is thus made economically whole. The likelihood of certifying significant numbers of valid mining claims on geologic parameters is dealt with above and in the unit analyses. Overall the likelihood is very low that any of the fraction of claims certified will be brought to actual production. It is not the threat of a claim but the ground disturbance associated with actual development which is detrimental to wilderness values.

The EIS states in all alternatives that wilderness designation will have an adverse impact on grazing permissives because of increased costs of range improvements. However, the EIS also states that essentially all cost effective range improvements have already been made within the WSAs. There is only one range improvement planned in the Rigidan's Well WSA. This well will be dealt with in the unit analysis for the WSA. As no other range improvements are planned or held to be cost effective the economic impact is nonexistent. There is an insignificant potential adverse impact if new range improvements are designed and found to be cost effective.

The following WSA unit analyses will show that the sum of all acreage found "suitable" under any of the alternatives other than "All Wilderness" has high wilderness value, is manageable, has an insignificant impact on the minerals and energy industries and an insignificant economic impact on the economy and social fabric of the local area. All such areas should therefore be recommended to Congress as suitable for designation as wilderness areas.

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WILDERNESS ALTERNATIVES  
ALL

UNPATENTED



MAP 2  
PARK RANGE  
NV-040-154

Park Range MSA (NV-040-154)

Size: 47268 acres

Naturalness: Pristine

Solitude: Exceptional  
Topographic Screening: Excellent  
Vegetative Screening: Good

Primitive Recreation: Outstanding

Special Features: Archaeological sites, ungrazed mountain meadows, raptor eyries, wild horses

Energy: No recorded production  
Oil and Gas: Low potential  
Geothermal: 22,250 acres based solely on inference

Minerals: No recorded production  
Potential: Low metallic mineral potential  
Claims: None

Manageability: Said by BLM to be manageable under the preferred alternative  
Essentially self protecting  
No private land  
437 acre crested wheat grass seeding

Manageable Forest Land: 9000 acres or about 2% of RA resource

Economic Impact: Negligible on all sectors

BLM Perceived Conflicts:

Conflict # 1: 437 acre seeding is unnatural  
BLM Resolution: Exclude from suitable area  
Acceptability (this comment): Acceptable

Conflict # 2: 22,250 acres moderate geothermal potential  
BLM Resolution: Incore - mitigated by remote location and lack of economic infrastructure

Acceptability (this report): Concur with comment.  
This moderate classification is too high to begin with. No geothermal activity is known in the MSA. Classification is based only on inference and is therefore "speculative" potential. Action is the same.

8 | Area To Be Found Suitable: 46,831 acres (same as the preferred alternative)

Blinden's Well MSA (NV-040-166)

Size: 57,002 acres

Naturalness: Very natural

Solitude: Excellent  
Topographic Screening: Very Good to Fair  
Vegetative Screening: Excellent

Primitive Recreation: Good (BLM).

9 | Comment: I do not understand this rating. The diversity of scenery may not be outstanding but the opportunities for primitive recreation are excellent. Scenic qualities are excellent in mountainous core and throughout Heath Canyon.

Special Features: Ponderosa Pine, wild horses, raptor eyries, elk and big horn sheep, especially scenic Heath Canyon, Thunder Cave

Energy: No recorded production  
Oil and Gas: Low, no potential  
Geothermal: Low, no potential

Minerals: No recorded production  
Metallic Minerals: 2950 acres moderate (BLM) remainder low potential  
Non-Metallic Minerals: Moderate throughout MSA  
Claims: Two blocks - 16 in and near Great Canyon; 47 in the east central portion; 23 along southern border

Manageability: Said by BLM to be manageable under the Wilderness Emphasis (C) Alternative. There are no private inholdings. There are numerous cherry stem routes along the SE bench which pose an ORV problem. There is one proposed well.

Manageable Woodlands: 17,892 acres or about 4% of RA resource

Economic Impact: Negligible all sectors

BLM Perceived Conflicts:

Conflict # 1: 2950 acres of moderate (BLM) metallic mineral potential would be withdrawn from mineral entry  
BLM Resolution: Under the Wilderness Emphasis Alternative 1230 acres would be included in the suitable portion.



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The remaining 1520 acres would be part of 7360 acres deemed unsuitable in the western tip availability (this comment): The "moderate" potential classification is too high. It is based solely on the presence of the Thrust fault (a favorable geologic parameter) and the Jasperoid gold deposit model. No Jasperoid is in fact known. This fits the definition of "speculative" potential exactly. There is some potential for gold and tungsten according to the BLM because of mines in the Troy District to the southwest. The geologic environments which host these ores are not known to extend or occur in the WSA. There are no occurrences or prospects in the WSA (WTR p. 63). The 2940 acres should have a "speculative" classification. The entire 7360 acres, which has high wilderness values, should be returned to the suitable area. This area (7360 acres) is critical as it is adjacent to a USFS Presidentially endorsed wilderness area to the south and connects along the length of Heath Canyon to Blue Eagle WSA which is recommended preliminarily "suitable" in the Tonopah Draft EIS. Designation would also increase manageability of all three areas by making the total designated area more compact.

Conflict # 2: There is a proposed stock well in the Dry Basin (also in the 7360 acre area above)

BLM Resolution: Either declare 7360 acres unsuitable or disallow development of the well

Comment: The permittee does not have a "right" to the well. It is unclear from the EIS and WTR if the proposed well is cost effective. Let's assume that it is. The proposed well is only 0.25 miles up a draw into the WSA. If the well can be moved downstream it would soon be outside the WSA and be allowed. Alternatively the well could be permitted where it is and access allowed if sufficient justification can be found for protecting the range or wilderness value. This may take some creative thinking on the part of those in favor of development. The simplest and best solution is just to move the well downstream to the WSA boundary. The well is certainly not justification for removing 7360 acres of prime wilderness from "suitable" status.

Conflict # 3: "Moderate" potential for non-metallic minerals throughout

BLM Resolution: Conflict entirely mitigated by abundant supply, closer to markets available throughout the general area. No rational or interest in development.

Comment: I concur.

Conflict # 4: Excessive ORV accessibility to SE benches.

NO  
OR

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Resolution: Remove approximately 5900 acres (wilderness emphasis) or 5200 acres (preferred) from those "suitable" for recommendation.

Comment: The boundaries proposed by either alternative are within 0.25 miles of each other and in fact cross. Either would be acceptable with the following caveat. I feel that the best boundary is in fact the boundary road. It is easily defined and is unequivocal. There will always be boundary effects and it is best to keep these effects from impacting core wilderness values. The area is remote and usage is very low. The deleted area has lower (but not low) wilderness value but plays a vital role as a buffer zone. See above for BLM rationale for controlling ORV. If no real problem exists, don't fix it.

Conflict # 6: Potential ORV abuse in northern portion.

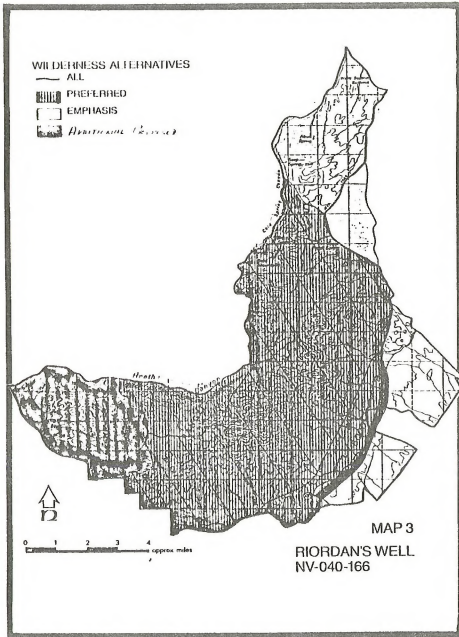
BLM Resolution: In the BLM preferred alternative the resolution is to delete about 5600 acres. In the wilderness emphasis alternative the solution is to add about 2000 acres to the WSA increase manageability and solitude. The latter is better because the area to the NW and adjoining the WSA along the lower reaches of Cold Spring Canyon is part of the Blue Eagle WSA which has been preliminarily recommended as suitable in the Tonopah Draft EIS. Including this area improves manageability of both WSAs greatly by eliminating a huge reentrant into the wilderness areas. The wilderness emphasis alternative should be adopted for this conflict.

Summary: The Wilderness Emphasis Alternative area with the restoration of approximately 7360 acres on the western tip of the USA, should be recommended as suitable for designation as wilderness. There are no documented, substantial, unmitigated conflicts with this action.

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South Egan Range WSA (NV-040-160)

Size: 96916 Acres

- **Naturalness:** Very natural condition, particularly in the high country. The center of the unit has some impact of cherty stone roads and range improvements.
- Suititude:** Outstanding opportunities are present in most of the WSA.  
**Topographic Screening:** Excellent with rugged mountains and cliffs.  
**Vegetative Screening:** Excellent in the high country.
- Primitive Recreation:** Outstanding opportunities for recreation. Strongly supported by the Nevada Division of State Parks. Hiking, hunting, nature study, horseback riding, rock and technical climbing and spelunking are excellent.
- Special Features:** Archaeological sites, Ansel Cave, bristlecone pine, Gambel's quail, elk, raptors and massive limestone cliffs are of interest.
- Manageability:** The area is said to be manageable as wilderness under either the Wilderness Emphasis or Wilderness Alternatives.
- Energy:**  
 Oil and Gas: Low potential - exploratory wells have shown no commercial shows of oil or gas  
 Geothermal: Low potential
- Minerals:** No active mining in the WSA  
 802 acres of "high" mineral potential (BLM)  
 7633 acres of "moderate" mineral potential (BLM)  
 Remainder of WSA has a low potential for minerals  
 Non metallic mineral potential high in the Ellison District (BLM)
- Forestry:** 15000 acres is manageable woodland 3% of Egan RA resource
- Economic Impact:** Negligible beneficial or adverse impacts on all segments of economy.
- Conflicts Perceived by BLM:**  
 Conflict # 1: Withdrawal of 802 acres of "high" mineral potential represents an adverse impact to the mining community

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BLM Resolution: Exclude this area from acreage recommended suitable

Comment: The potential assigned here should be "unsu". The Ellison District has only very small mines, none of which were large producers. All of the rich oxidized surface ore has been mined out and drilling by a major company revealed no new reserves. This is the definition of "unsu potential" in the WFR Glossary. The area has been excluded under the Wilderness Emphasis and De-emphasis Alternatives. I concur.

Conflict # 2: Withdrawal of 7633 acres of "moderate" mineral potential represents a significant adverse impact on the mining community

BLM Response: Exclude all but 4300 acres of this area under either the Emphasis or De-emphasis Alternatives.

Comment: The proper mineral potential classification for this acreage is "speculative." There are no known mineral occurrences or even particularly favorable geology. Past mining is some miles away. No models even predict economic deposits here. All the known ore controls are well to the north. Mining of a non-existent resource will not extend into this 4300 acre area.

Conflict # 3: Potential OWR management problems on cherry stem roads into the Interior-particularly in the Sheep Pass Canyon Area.

BLM Resolution: Condemn the entire USA and deem the entire USA unsuitable for designation under the Preferred Alternative.

Comment: The BLM resolution of this conflict cannot be justified by documentation. Under the Wilderness Emphasis Alternative there are no remotely significant conflicts with anything but OWR manageability. Even the De-emphasis Alternative found the "impenetrable" 16000 acres in the north acceptable! The de-emphasis alternative finds any resource conflict significant and throws the area out.

As to OWR manageability, the BLM's own study found no current significant impacts and therefore no current need of remedies to OWR abuse. How then can an entire USA, two-thirds of it inaccessible to ORVs be thrown out on the basis of potential OWR abuse! The solution is very close at hand in my front. Should OWR abuse actually occur then BLM has the authority and the obligation to restrict OVA access under either the IMP or Wilderness Management Program. The penetrating roads can be closed to all but permittees and BLM vehicles. This can be done easily where the roads enter the narrow defiles to breach the ridge.

BLM claims there is no current abuse and that none is anticipated in the RA. The remedy for potential abuse is readily at hand and is inexpensive. Measures were outlined in the general comments about deliberate OWR trespasses. This is a bogus excuse for the reduction of Wilderness acreage. Very real concerns affect much of the acreage removed from the USA under the Wilderness Emphasis Alternative. This reduction can perhaps be justified. The obliteration of the USA cannot!

The Wilderness Emphasis Alternative should be adopted (with roads closed to all but permittees if necessary). The 57,460 acres should be recommended to Congress as suitable for Wilderness Designation.

## COMMENT LETTER 35

Goshute Canyon WSA (WV-040-015)

Size: 35,594 acres

Naturalness: One would perceive the WSA to be in a natural condition

Soiltype: Outstanding  
Topographic Screening: Excellent. The mountains are steep, rugged and dissected with many canyons  
Vegetative Screening: Good-mostly mixed conifer and piñon/juniper forest cover on mountains

Primitive Recreation: Outstanding-splunking in Goshute Cave, fishing for Utah cutthroat trout, hunting deer and grouse, high scenic qualities, nature photography, hiking, camping, backpacking and winter sports

Special Features: Outstanding scenery, bristlecone pine, wild horses, archaeological sites, Goshute Cave, elk, spotted bats, Utah cutthroat trout, Goshute Canyon  
Natural Area

Manageability: Said by BLM to be manageable under the Preferred Alternative covering 22,225 acres or under the Wilderness Emphasis Alternative

Energy: Oil and Gas - potential is low  
Geothermal - low except in extreme SE

Minerals:  
5731 acres classified as "high" mineral potential by BLM and 18,733 acres of moderate mineral potential including a jasperoid prospecting target  
The remainder has a low mineral potential

Forestry: 5600 acres of manageability (1.2% of RA resource)

Economic Impact: Negligible favorable or adverse all segments

Conflicts Perceived by BLM:

Conflict # 1: Withdrawal of 5731 acres of "high" mineral potential would constitute a significant adverse impact on the mining community

BLM Resolution: Withdraw this area from the acreage deemed "suitable" under all alternatives other than all wilderness

Comment: The area under discussion contains no working mines, past mines or current prospects

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These were all deleted during the intensive inventory. The 5731 acres are however of "good" potential because they are adjacent to the active mining areas, and have some favorable genetic characteristics, but are at some distance from the producing areas. The subject acreage has only a "good" potential but it should be withdrawn from the suitable acreage.

Conflict #2: There is a Jasperoid prospecting target for a disseminated gold deposit in the south central portion of the MSA.

BLM Resolution: This prospect has been thoroughly explored and drilled and an exploitable deposit was not found and the claims were dropped.

Comment: The area can now be safely assigned a potential value of "speculative" at best, not the "good" or "moderate" values assigned by the BLM. The exploration has shown that an economic deposit is not there with considerable confidence. I concur that the presence of the Jasperoid can be ignored in this case.

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Conflict # 3: Withdrawal of 18,733 acres of moderate mineral potential represents a significant adverse impact to the mining community.

BLM Resolution: Withdraw the southern portion (13,369 acres) from the area recommended as suitable under the Preferred Alternative and 8500 acres in the southern portion in the Wilderness Emphasis Alternative.

Comment: The subject acreage is far removed (up to 5 miles) from the active mining properties. The specific ore controls important within the Cherry Creek District are well known and have been essentially explored.

These controls do not extend into the area in question. At best this acreage should have a "speculative" potential rating and some if not all should be restored to the acreage found "suitable."

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Conclusions: Approximately 8500 acres in the southern portion of the MSA should be withdrawn because of mineral conflicts. The remainder of the MSA has been found to be manageable under either the Preferred or Wilderness Alternatives. Exclusion of this area essentially removes all conflict of potential economic mineral production. No acres of genuine "high" or "good" mineral potential as defined in the Glossary of the MTR remain in the area proposed as suitable. As a result, the amended Goshute MSA (less the 8500 acres mentioned above) should be recommended to Congress as suitable for Wilderness designation.

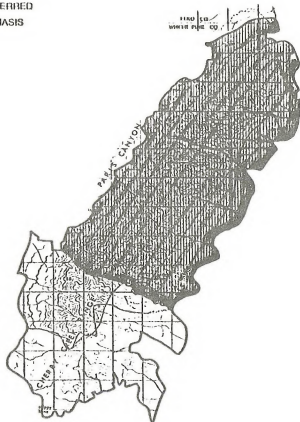
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WILDERNESS ALTERNATIVES

- ALL
- ▨ PREFERRED
- EMPHASIS



MAP 5

GOSHUTE CANYON  
NV-040-015

## COMMENT LETTER 35

### Summary

Portions of all four WSAs should be recommended as suitable for Wilderness Designation. There are:

Goshute Canyon WSA (NV-040-015)	27,094 acres
Park Range WSA (NV-040-154)	46,831 acres
Riordan's Well WSA (NV-404-166)	53,091 acres
South Egan Range WSA (NV-404-168)	57,660 acres
<b>Total</b>	<b>184,676 acres</b>

In the 185,000 acres more or less there are no substantiated unmitigated significant adverse impacts. There are no "high" or "good/moderate" mineral potential lands in the proposed acreage and therefore no significant adverse impact on the mining community. There are no ORV management problems which cannot be simply remedied. In short, on this acreage, there are no overriding conflicts and these portions of the four WSAs must, according to the law, be suggested to Congress as suitable for designation as Wilderness Areas under the National Wilderness Preservation System.

## RESPONSE TO COMMENT LETTER 35

### Response Number 1

The social conditions sections in the draft EIS were never meant to provide a political solution. Social and economic impacts are just one of the many criteria that needed to be addressed before a decision was made on the Proposed Action. Refer to Appendix A for a list of these criteria.

### Response Number 2

The Draft EIS/EIS is a document designed to help the manager make decisions by presenting a range of alternatives and analyzing their impacts. A draft document should not justify any alternative. It is up to the manager to choose the proposed action from the information presented in the draft.

### Response Number 3

The ORV manageability issue stemmed from the BLM's manageability criteria in the study policy. This criteria was applied in formulating the alternatives. Carrying it into the body of the EIS caused confusion as it did not really belong in an environmental analysis document. Reference to manageability has been deleted. The Affected Environment and the Environmental Consequence chapters have been rewritten to more accurately reflect reasonable ORV use in the long term. We have attempted to incorporate your concerns to this revision.

### Response Number 4

The alternatives were formulated to present a broad spectrum for analysis purposes. The fact that areas may have been excluded under certain alternatives because of manageability concerns in no way reflects the area's management. All WSAs, in total continue to be managed under the Interim Management Policy until Congress either designates or releases an area from wilderness consideration.

### Response Number 5

The definitions for mineral potential listed in the Wilderness Technical Report have been supplanted by the same "Classification and Confidence" scheme used in other BLM EIS's. All analyses of mineral potential contained in the Technical Report is based on this latter scheme, and this document carries the appropriate definitions.

### Response Number 6

The BLM recognizes that the presence of oil and gas leases does not indicate potential for oil and gas.

### Response Number 7

The mineral impact sections in the Final EIS have been revised to analyze impacts on mineral development in a more realistic site specific manner.

### Response Number 8

Your support for the Preferred Alternative in the draft document for the Park Range is noted.

### Response Number 9

The BLM's wilderness inventory indicated that the opportunities for primitive recreation are quite good, but they are not considered outstanding. The inventory did indicate that the opportunity for solitude was outstanding.

### Response Number 10

The mineral inventory to be conducted by the USGS/BM will supply more accurate minerals information for this WSA.

RESPONSE TO COMMENT LETTER 35

Response Number 11

The removal of the 7,360 acres on the west side of the WSA from the Proposed Action was based on the potential of the area for mineral resources, not because of a potential well development.

Response Number 12

Manageability concerns and lower wilderness values combine with potential for oil and gas to exclude the east valley part of the Riordan's Well WSA from several of the partial wilderness alternatives, including the Preferred Alternative in the draft document.

Response Number 13

Your preference for the Wilderness Emphasis Alternative from the draft document for the Riordan's Well WSA has been noted.

Response Number 14

Additional information suggests potential for a mineable subsurface deposit. This, in combination with the revised definitions of mineral potential, warrants a "high" potential rating.

Response Number 15

The revised definitions of mineral potential allow for this rating. Information from claim holders further substantiate the findings.

Response Number 16

Your preference for the Wilderness Emphasis Alternative from the draft document to the South Egan Range WSA has been noted.

Response Number 17

The Jasperoid prospect mentioned has definitely been drilled by Amasco Minerals and they have dropped this area from further consideration. It may be however, that a smaller company could still be interested in the area. It is felt that further study of the area is warranted and no change in mineral classification needs to be made.

Response Number 18

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM has determined the four alternatives analyzed were sufficient to adequately address the environmental impacts.

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COMMENT LETTER 36



11-25-83  
 Dear Mr DeSpain,  
 DISTRICT MGR, ELY, DEL.

IN CONSIDERATION OF AREAS SUITABLE FOR WILDERNESS, YOUR ELY DISTRICT CERTAINLY MUST HOLD A MULTITUDE OF PLACES THAT QUALIFY.

IN THE FEW TIMES THAT I HAVE VISITED SOME OF THESE PLACES, IT IS NOT WITHIN MY PROVINCE TO JUDGE. I WOULD BE INDEARED BECAUSE I COME FROM CALIFORNIA, BUT THE SAME THE AREAS UNDER CONSIDERATION DO HAVE FEATURES MANY OF WHICH ARE IMMEDIATELY IDENTIFIABLE, BUT MANY THAT HAVE ESCAPED MY SIGHTING. HOWEVER, BUT PLEASE DO CONSIDER ALL THE BEERAGE IN THE ELY DISTRICT THAT ARE BEING CONSIDERED AND DON'T BE SPICY.

I AM AN "ALL OR NOTHING AT ALL" ADVOCATE.

CONSIDER WHAT YOU ARE TRYING TO SAVE AND PROTECT. NOT FOR ME, BUT, FOR FUTURE "ME" PEOPLE THAT WANT TO COME TO NEVADA AND ENJOY MORE THAN JUST THE CASINOS, THE FANCY SHOWS AND ENTERTAINERS, THE GAMBLING. SOME OF US LIKE THE NATURAL. SURE THAT OUR COUNTRY WAS BLESSED WITH.

TRY TO SAVE SOME OF YOUR STATE. DON'T LEAVE IT FULL BY THE WAY FOR PROMOTERS, COMMERCIAL ENTERTAINERS TO RUN. KEEP SOME OF IT - NO - AS MUCH AS IS PRACTICABLE TO GO - AS IS.

*Harold L. Dittmer*

HAROLD L. DITTMER  
 3911 FERNHILL AVE  
 LOS ANGELES CA 90027

RESPONSE TO COMMENT LETTER 36

Response Number 1

Your support for wilderness has been noted.

COMMENT LETTER 37

9745 Lamar Street  
Spring Valley, CA 92077  
November 22, 1983

Mr. Merrill DeSpain  
Ely District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89703

Dear Mr. DeSpain:

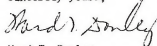
I wish to make comment concerning the possible designation of certain areas as wilderness within the Egan Resource Area. Let me first express my appreciation for the wildernesses already established in your district. Land, a finite asset, cannot be restored to its original form once its pristine state has been violated. For that reason, the concept of wilderness is vital in this day of rapid despdation of the land that one can see in virtually every corner of our country.

I wish to make the following brief remarks:

- Goshute Canyon unquestionably merits consideration as a wilderness and, in my opinion, there should be no hesitation by the Bureau of Land Management in so recommending it.
- 1 - Riordan's Well has been recommended as wilderness but not at an acreage level commensurate to realize its full potential. Since it is an important bird raptor location, the 37, 542 acres currently in the recommendation ought to be enlarged.
- The South Egan Range has not been recommended but should be. It appears comparable to Riordan's Well in its wildlife assets and really should not be left out as a wilderness area.

Thank you for your kind attention to this letter.

Sincerely yours,



Ward T. Donley



Response Number 1

Your support for the Goshute Canyon, Eldoran's Well, and the South Egan Range WSAs as wilderness has been noted.

Dec. 17, 1983

Mr. Merrill L. DeSpain  
 Ely District Manager B.L.M.,  
 S.R. 5, Box 1  
 Ely, Nevada 89301

Dear Mr. DeSpain:

Thank you for mailing me the Draft Egan Resource Management Plan and Environmental Impact Statement. In general, I like the manner in which the different values were treated, and felt that much of the bias I had encountered in earlier statements had been eliminated. However, I still do not favor the Preferred Alternative but would like to lend my support to Alternative B, which gave a more reasonable treatment to all the multiple use values, balancing those of the U.S. Public at large against those of local vested interests. I somewhat favored Alternative E, but believe that its implementation would be very hard to achieve. If Alternative E, the elimination of livestock grazing from public lands --an alternative entirely possible since the land is public--were to be accomplished, then some alternative program should be funded for those livestock operators who would be forced out of business due to the action. Such an alternative program was not mentioned; and, so widespread discontent would result. Although I dare say that the naïve Indian who had a life-style distinct from that of the white was given no such special consideration when the white largely displaced him and his way of life from the land which was his birthright.

The following are my specific comments to the Draft:  
 p. 7, Alternative B. Social Analysis: This is said to be a significantly adverse impact and it is true that it would stir things up quite a bit, yet I wonder whether its end result would not be better for the majority of the U.S. citizens, for it would mean that they would have to face up to the harsh reality of what public livestock overgrazing is doing to our marginal desert lands. Perhaps if they faced up now and such a drastic measure as Alt. E was taken, a better way of life would emerge and catastrophe would be averted. This would require a government with considerable foresight, however, and the means to accomplish this change by developing new and imaginative lifestyles.

Ch. I: Planning Issues and Criteria.  
 Purpose and Need: 3rd P., beginning: I disagree with the overall purpose of the resource management planning process as stated: "to improve the resources of the resource area which would result in increased goods and services to the public land users and general public." This overlooks the goal of the preservation of inherent natural values, and discounts them as being of little or no value. Too often it is only after such existing non-money producing values are gone that we realize their overriding value both to society and in and of themselves.  
 3rd P., ending: There needs to be a well-thought out and long-term balance between multiple-use and sustained yield and the ecological, etc., values, so that use does not become abuse and some expression of the native ecosystem itself is allowed to manifest itself.  
 p. 12, Settling: 2nd P.: Tourism indicates the importance of the area to the general public. Often this is greatly underestimated for no tally is kept of all the visitors to the area or the vicarious appreciation that the public feel for it. This value should not be underestimated in its importance for it affects the very quality of human life.

## COMMENT LETTER 38

Downer-2

Criteria Upon Which The Selection of the Preferred Alternative and Planning Decisions Will Be Based  
 P. 13, 2nd P: You should mention the preserving of values or qualities rather than speaking only of usms.

1st P: Good.

P. 14: Criteria Guiding the Development of Alternatives.

1st P: Protection Parameter: I favor this statement as set forth. I think the natural values such as wilderness, wild horses, and wildlife --and the former is a part of the latter--should outweigh in importance the livestock usage of the land. This would be fairer to all the people of the United States.

I disfavor the Development Parameter...in general I favor the protection parameter in the Wilderness Designation and other use aspects.  
 P. 15, GRV: There is a great need to restrict GRV's in the desert environment. Mineral Resource Management: There is a great need to address the environmental impact of mining activity upon the desert ecosystems.

Ch. 2, Alternatives.

Of the 6 presented I favor Alternative B. I think it is a fairer balance among the various uses and values represented in the Egan Resource Area. And, although I am partial to E, I think it would prove unrealistic at this time.

Preferred Alternative:

Realty Management: I object to the disposal of so much public land in the 5 zones and believe it would be better to leave the land in public hands in most--but not all--cases.

Wilderness Study Areas

P. 24, a. Goshute Canyon: Too much acreage has been deleted here. This would be a detriment to the integrity of the wilderness area. Furthermore, many of the spillover factors would be erased with time and wilderness qualities removed if the areas were declared as wilderness.

d. South Egan Range: I find the exclusion of this area unacceptable. This is a splendid area. Most of the objections you mention could be overcome were the area declared wilderness for the same reason mentioned under Goshute Canyon.

P. 26, Alt. B: I do not agree with managing the wild horse herds at their 1982-83 levels, as these are far short of those which would result from the horses natural place in the desert ecosystem. I think that maintaining them at this level would result in a wild horse population that is frustrated in its attempts to come to terms with its environment and fill a vacant niche which exists for it in the Egan Resource Area as elsewhere in Nevada and for which it is preadapted (referring to the long prehistory of equids in North America).

P. 27, 6. I approve of the plan for wild fire...some fire should be allowed to burn in order to renovate the land and allow for a greater variety of habitat types and therefore niches for a greater variety of organisms.

7. I also agree with the reintroduction of antelope into their historic ranges and to the reintroduction of elk--but for this to occur the reduction of livestock grazing would certainly have to be more than a "paper titer". Realty Management: I favor not disposing of land in "wildlife habitat" or in a wild horse herd management area, but by wildlife do you only mean rare species? Also, you should look with an eye to the potential wildlife habitat of these various areas. --Certainly all land is potential wildlife habitat for these various areas, when allowed to its own course. The question is: where would it have the best chance to continue in largest units of continuity and with the greatest degree of habitat diversity.

NO  
OO

## COMMENT LETTER 38

Downer-3

P. 27, Wilderness Study Areas: I very much favor the designation of all 4 WSA's in their entirety. These 4 are already greatly reduced from those originally possible and should be declared in their entirety in order to adequately represent the wilderness value and all the various desert habitat types. (I am especially upset by the elimination of the South Egan Range from the preferred alternative.)

Alt. C.

P. 30, Realty Management: I object to the disposal of this much land.

Alt. D.

P. 32, Management Action

2. There are too many vegetative conversions.

4. Cutting the wild horse herd back to such a low level is not at all acceptable to me. This is not a fair representation of the wild horse population on public lands.

P. 33, Long-Term Actions

3. This is not fair multiple-use, but is dominant livestock use.

P. 34, W.S.A.'s: 1a. Goshute Canyon: This is a beautiful area with exceptional solitude which should be protected as wilderness, not dropped from consideration.

Alternative E

Management Action

6. You say prescribed burns would enhance wildlife and wild horse habitats--but my question is which wildlife? Many non-game species thrive in bushy or forest habitat, i.e. owls, song birds, and depend on the pinyon nut and other food sources here. These deserve equal consideration.

P. 36, Realty Management

1. How is it known that these lands are not in wildlife habitat? Again are we considering only game animals?

Wilderness Study Areas: I am very much in favor of designating these 4 WSA's in their entirety. These are only a small fraction of the total resource area and deserve further study. Enough will be dropped by the time Congress gets around to declaring Nevada's wilderness, without major surgery at the initial stage.

P. 38, Wild Horses

How will the 1971 herd areas be determined. I hope not simply by talking to ranchers. Also, I would like to know how the wild horses can be both free and restricted to these herd areas. If they are free then they are distributing their grazing pressure more equitably. Do you allow the wild horses to shift their distribution over time according to their nomadic life style.

P. 39, Selective Management

To what extent are these judgements of current satisfactory or unsatisfactory arbitrary and what are the long-term trends?

P. 43, 9. I favor the exception of riparian areas from vegetative conversion.

P. 44, I protest the use of vegetative conversion requiring herbicides, which can have major detrimental impact on many organisms in the desert community.

Ch. 3, Impacted Environment

Wildlife, P. 61, Mule Deer: Nevada's Dept. of Wildlife's bucks only hunting upsets the stability of the deer population, killing off the fittest male members of the population, resulting in increased productivity each year, but little long term stability and co-adaptiveness of the population to its environment.

P. 62, Bighorn Sheep: These animals contract disease from domestic sheep, which should be lessened or excluded from areas of bighorn introduction.

4.

Aquatic. P. 64. It is important to protect the White River Speckled Dace and Mountain Sucker, remnant native fish that show much about adaptation to the high desert. Strict measures are needed to assure their survival. Wild Horse. P. 66. This competition between wild horses on the one hand and wildlife and livestock on the other is misleading as stated. The wild horse is wildlife, adapting to the natural scene. The livestock are set out on the range and artificially propped up by man. They are the chief problem in Nevada's desert ecology.

The problems that the wild horses will face in the future can be circumvented by proper actions in the present, and by enforcement of regulations of watering rights and unrestricted movement. I recommend the BLM's using trade-off agreements to effect this. After all, it is a privilege for livestock to graze on the public lands whereas the wild horses have a right to do so.

Wilderness. P. 70. Large contiguous areas of wilderness preservation are important for the preservation of life communities intact.

F. 72. Social Analysis.

Since the BLM Resource area is 86% public land, the entire U.S. public should have a proportionate say in what happens to this land.

F. 73. There are other more important values at stake here than more beef. The meat industry is already causing serious health and ecological problems and habitat destruction right in our own country and on a world scale.

F. Livestock Grazing is a privilege not a "right."

I would also oppose this massive sell-off of public lands.

F. 74. The local citizens should also have some regard for the natural values at stake here. "Traditional Nevada antipathy" for the federal government and the wilderness program is true for vested interests, but not necessarily for the majority of Nevadans, nor Americans.

Ch. 4. Environmental Consequences.

Introduction. P. 91. It is an oversight to think that the environmental impacts to air quality, soil, and ground and surface water are not considered to be significant. Even the maintenance of the level of livestock grazing as preferred alternative will continue to aggravate a worsening condition of water depletion and soil erosion. Much of the dust that is blown off the desert ends up in the high atmosphere where it definitely does affect the air quality--and on a world scale!

F. 93. Are you sure that little damage is occurring from OHV's? I doubt it. Determination of Significant Impacts. The resource specialist should not be influenced by public opinion when it comes to judging trends and impacts to desert ecology.

The 10% figure for judging significant impact seems arbitrary, but is at least consistent for most of your categories.

F. 94. Wild Horses. Put a herd, I would recommend more like 100 as the minimum level--and even this would be too small, in my opinion.

F. 95. Economics. The percentage figures here are smaller than for other natural values. I think instead of accepting the status quo lifestyles, the government should attempt to develop alternative lifestyles which would be more compatible with the other desert qualities here.

Visual Resources: I approve of your criteria for Visual Resources.

PREFERRED ALTERNATIVE: Wild horses and wildlife should benefit in the same proportion as livestock from any range improvement. But be careful you do not overlook vital components of the desert ecosystem which may not thrive with these "improvements."

F. 98-99. Wild Horses: Very important to preserve distinctive characteristics by preserving the stallions and the breeding mares. It is not acceptable to me that herd viability would decline.

I would like to know how you know just how few wild horses are

5

injured, including all those that are chased and may become lame and go off in the desert to suffer or die. I have seen these escapees, or survivors, limping along, scared out of their wits by a recent BLM helicopter roundup.

F. 101. Wilderness. This proposed reduction is excessive since the wilderness areas are already small enough before being further reduced. F. 103. The drooping of the BLM WSA is certainly an oversight due to the area's vastness, natural solitude and wilderness characteristics. Conclusion. I agree that a significant adverse impact is incurred by dropping the BLM WSA.

F. 102-3. Minerals and Energy. I really doubt that in the overview the loss of these WSA's from mining would be significant to the industry which has access to the large majority of public lands already--and more than enough to exploit.

F. 103. Social Analysis. The view by ranchers that the wild horses are causing the destruction of public range lands is erroneous; rather, it is their own livestock which have been causing this!

F. 104. Public values would suffer due to this commercialization. Wilderness visitors would create wholesome recreation in Nevada and improve the state's image.

F. 105. Realty Mgmt. There is a large discrepancy here between sale value and assessed value and this should not be tolerated by the U.S. taxpayer.

F. 111. Wildhorses. 6. How would the BLM insure that the distinctive characteristics would not disappear after the roundups? This is not at all clear to me.

F. 112. Wilderness. It is absolutely unacceptable that no wilderness WSA's would be declared.

F. 113. Social Analysis. Wild horse population levels are minor and degradation of habitat is the result of too many livestock.

Alt. B.

F. 119. Wild Horses. 1. The BLM must assure that the wild horses receive an equitable portion of these increased AUM's.

F. 120. 6. Is there a contradiction here? How can wild horse be free-roaming and remain confined to the arbitrarily imposed 1971 herd use areas? And how does this set with the ecological health of the life community?

F. 120. 6. If this wild horse gathering is random, then how can you be sure of this outcome? What is your method of selection?

Realty Mgmt. 1. I favor this low rate of realty disposal but object to the overall amount. Also, is 39,555 acres to be a ceiling?

2/F. 121. Utility industry should try to minimize corridor area and use these to the maximum degree necessary.

Social Analysis

F. 123. Cultural heritage in wilderness. Yes, indeed, this would uphold a long tradition of naturalism, stemming from Thoreau and even the Indians. Ref. Paul Brooks. 1983. *Speaking For Nature*. Sierra Club, S.F. Last P. The individuals who use the area see their use as a right to act without considering the consequences; really, they guard their right to destroy.

F. 124. Economic Analysis. The few would have to look elsewhere for livelihood or develop a more compatible livelihood in this area, so that the many would benefit.

Alt. C.

F. 130. The wild horse's numbers should actually increase if the multiple-use concept is fairly applied.

F. 133. Social Analysis. This indicates that the BLM is catering to locals and is not adequately representing the public interest--which is the nation at large!

Alternative D. P. 136. Vegetation: This further deterioration of vegetation is unacceptable and at the root of many of the problems here.

P. 137. I find it unacceptable that present livestock use would increase above present and that wild horse herd viability would be lost (p. 138) and characteristics eliminated (p. 139).

P. 139. Realty management. Unplanned expansion would lead to serious social problems in the future, similar to those of the 3rd world.  
P. 140. I object strenuously to the wholesale droppings of WSA's and acreages, especially flagrant in the case of Goshute WSA.

Alternative E. Many undesirable elements here, including the concentration of use around waterholes, favoring of big game over other species, etc.

P. 145. Wildlife. Wild horse reducing competition for bitterbrush indicates a complementarity between mule deer and wild horses.

2. Big game... This will also be a better use of the land, i.e. more meat possibly harvested while at the same time preserving the ecological balance.

P. 146. Wild Horses. The 1982-3 level is still artificially low and not in accord with the wild horses' natural place in the ecosystem.

P. 147. Wilderness. I greatly favor the inclusion of all 4 WSA's in their entirety.

P. 148. Minerals and Energy. I doubt that mineral development would be so adversely affected due to the large portion of public lands already open for such.

P. 149. Social Analysis. Perhaps the elimination of livestock grazing would be best in the end, bringing a needed change. But sound alternative lifestyles should be worked out before so that a new and better way of life could emerge. More political support is needed for this truly revolutionary move.

Livestock Grazing. Ranch wealth would decline but greater values than money are at stake here.

P. 151. 4th P. A relatively small number of large scale ranchers hold the majority of AUM's -- about 1/3 of these account for a substantial majority of the state's AUM's.

Forestry. This could prove very profitable in the long term if well managed and done in moderation.

P. 152. Irreversible Commitment of Resources. Are concessions to development in balance with concessions to preservation and in accordance with the long-term public interest--meaning all the people in the U.S.? Irretrievable Commitment of Resources.

3. Mining Activities have and will continue to scar the land unless checked. There is a need to change the antiquated Mining Law of 1879 (?).

7. The loss of a ranch could be a positive gain if the people could evolve a sound alternative, perhaps incorporating much of the ranching life style, but getting away from dependence on destructive overgrazing and fencing and disruption of the freedom of life on the land.  
Short-Term VS Long-Term Productivity.

P. 153. 3. There is too much emphasis on productivity in the BLM's management program. You need also to mention such qualities as diversity, stability, balance, and complementarity among the various elements of the ecosystem.

CLOSING: Again, I appreciate this opportunity to review your Draft Management Plan for the Escalante Resource Area and hope that my suggestions and comments have been of some help to you. Please keep me informed of the progress of this and other plans.

Sincerely,



Craig C. Downer, N.S. P.O. Box 456 Minden, Nevada 89423

Response Number 1

Your support for Alternative B (the All Wilderness Alternative) has been noted.

## COMMENT LETTER 39

December 24, 1983

Merrill DeLoach, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 181,091 acres comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*H. Gregory F. E. 6/14/84  
14 East "I" St  
Ely, Nevada 89301*

## RESPONSE TO COMMENT LETTER 39

Response Number 1

Your support for the conservationist's alternative for the four WSA's is noted.

Ken Goldsmith  
565 Forest Rd  
Northford, CT 06472  
Nov 25, 1983

Dear Sirs,

I wish to go on record as strongly suggesting Alt. B of the Egan RMP.

1 In particular, I ~~would~~ urge wilderness designation for all four WSA's. As a frequent visitor to the Intermountain West (spending my tourist \$ in forests), I feel qualified to say that designating a few of the unique, undeveloped mountain ranges of the state (which <sup>as wilderness</sup> will greatly enhance their attraction to visitors while preserving wild & irreplaceable natural areas. The recommendations (in the proposed Alternatives) for the Park Range & Riordan's Well & Goshute Canyon are excellent, but the non-wilderness recommendation for the South Egan Range is faulty. This is a beautiful mountain area with outstanding recreational & natural features. I urge you not to give it to local, narrow mining & mow-cutting interests & preserve this area for the people of Nevada & future generations.

2  
3 The EIS does have a couple of problems. First, it is unclear exactly what areas are included & excluded in the WSA's in ~~the~~ each alternative. What exactly are the boundaries? Maps of each

area would be a great help. Second, all of the discussions of actions & effects of each alternative are rather vague & generalised. ~~For example,~~ <sup>For example,</sup> what condition is each riparian area in, and what is its suggested condition under each alternative? Here again, maps would help.

Sincerely,  
Ken Goldsmith



RESPONSE TO COMMENT LETTER 40

Response Number 1

Your support for wilderness for the four WSA's has been noted.

Response Number 2

The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

The maps have been redone in the final EIS to make the boundaries of each alternative for each WSA more clear.

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COMMENT LETTER 41

December 17, 1983

Doug Hansen  
3050 Covote Creek Rd,  
Wolf Creek, OR 97497

Merrill DeSpain  
Ely District Manager  
Bureau of Land Management -  
Star Route 5, Box 1  
Ely, NV 89803

Dear Mr. DeSpain:

I am writing in order to comment on the BLM's wilderness recommendations in the Egan Resource Area of the Ely District. Although the Preferred Alternative has one really good wilderness recommendation (Park Range WSA), I believe that one significant area was not recommended, and two that were recommended need to be expanded.

1 The South Egan Range WSA should be recommended because  
of its unique and very rare bristlecone pine and white fir  
forests, as well as its importance for birds-of-prey and deer.  
2 The Riordan's Well WSA should be expanded because it is part  
of a larger area of de-facto wilderness that includes the Blue  
Eagle WSA, which is part of an adjacent Resource Area, and  
land belonging to the Forest Service.

3 The Goshute Canyon WSA needs to be added because of the  
many wilderness resources it contains. Among these are a  
BLM designated Geological Area and a Designated Natural Area,  
important habitat for many kinds of wildlife, and its high  
recreational use.

Additionally, I would like to comment on the 80,000 acres  
the Preferred Alternative proposes to sell. Both Secretary of  
the Interior Watt and the Executive Branch's Property Review  
Board have totally withdrawn their support for such large scale  
land disposal. The 80,000 acres should remain in public hands.

In closing, I would like to point out that with the addition  
of the new or expanded areas I have mentioned above, the total  
amount of wilderness in the District would amount to less than  
7% of the district's total area. In addition, none of the areas  
have proven mineral reserves of any type, and in any case,  
each area recommended for wilderness would have to have a  
thorough mineral survey done by the U.S.G.S.

Sincerely yours,

*Doug Hansen*

Doug Hansen

RESPONSE TO COMMENT LETTER 41

Response Number 1

Your support for the Preferred Alternative for the Park Range has been noted as well as your support for expanded versions for Riordan's Well, South Egan Range, and the Goshute Canyon WSA's.

The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 2

The most important values in the Riordan's Well WSA, including the scenic areas, raptor habitat, and ponderosa pine, are contained within the BLM's suitable recommendation for the area. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

Response Number 3

The geologic and natural areas within the Goshute Canyon WSA are included in the Proposed Action in the Final EIS.

COMMENT LETTER 42

Ely, Nev.  
Dec. 22, 1983

Merrill L. DeSpain  
District Manager  
Bureau of Land Management

Dear Sir:

1 Even though the bureau has recommended the South Egan Range unsuitable as a whole for a wilderness area, I feel we should protest the suitability of any portion as being suitable. Our objections are as follows.

First is the possibility of a large mining area. This is in the north part of the study area. Not only the northern portion but the nine mile area on the east side of the mountain and the foot hills on the north western portion.

Second the possibility of oil or gas in the southern portions.

Third the numerous roads in the area from east to west, south and north. A primitive area in my opinion should be a place of solitude. A place that is quiet except for the birds and animals of the area and you have the occasional noise of an airplane overhead. In the latter part of 1983 in August, September, October and November, I spent about twenty nine days in the northern part of the study area. There wasn't a day when from two to four or more pickups and trucks and an occasional motorbike disturbed the solitude.

Fourth is the nearness of the town of Lund.

Fifth is the use of the area by the people of Lund and Preston. They have used it from 1900 to the present time for grazing, timber for building, fence posts, fuel wood and rocks for building plus picnicking, hiking and hunting.

I am better acquainted with the northern half of the study area than any other living being as my father run sheep and cattle in the area for years.

COMMENT LETTER 42

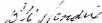
page 2

I have walked the aera many times and have ridden it horse-back. I have hunted in the aera for the past fifty five years and camed in the aera many times, prospecting and mining.

I am writing this letter of protest in behalf of myself and all the Hendrix families who have an interest in mining claims in the aera.

A copy of this letter, with the signatures of all concerned will be mailed to the Govner of Nevada and to our congressman and senator.

Sincerely,



B. W. Hendrix  
321 Fay ave.  
Ely, Nev.

RESPONSE TO COMMENT LETTER 42

Response Number 1

The Proposed Action recommends that all of the South Egan Range WSA is nonsuitable for wilderness designation.

COMMENT LETTER 43

P. O. Box 202  
Redwood Valley, CA 95470  
Nov. 29, 1983

Mr. Merrill DeSpain  
Ely District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, NV 89301

Dear Mr. DeSpain:

Thanks to the BLM for recommending as wilderness areas Park Range WSA and Riordan's Well WSA.

1 | However, we would like to see Riordan's Well increased to 45,791 acres, as it is an important raptor location.

2 | We feel Goshute Canyon WSA deserves full recognition as a wilderness area. Also, South Egan Range WSA (listed in BLM's Draft EIS) would be a very desirable wilderness.

Very truly yours,



Gail Hrubik



Maxine Hrubik

RESPONSE TO COMMENT LETTER 43

Response Number 1

Your preference for the 45,791 acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.

Response Number 2

Your support for the Goshute Canyon and South Egan Range WSA's as wilderness is noted.

2001 Santa Lomas  
El Cajon, California  
December 8, 1983

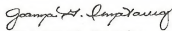
Office of the District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada

Dear Mr. DeSpain:

- 1 Your agency if to be commended for wilderness recommendations involving  
the following areas: Goshute Canyon (28,000 acres) and Park Range  
2 (46,831 acres). While Riordan's Well is included in your recommendations,  
the acreage should be upped to 49,791 acres to allow a suitable range  
for the large population of birds of prey residing therein.
- 3 Sadly your agency did not recommend South Egan for wilderness status.  
It is a fine area with raptor habitat similar to Riordan's Well. Please  
reconsider and designate 57,600 acres here as wilderness.

You may wonder why someone from Southern California would bother about  
wilderness areas far from home which probably will never be personally  
even seen. I find wilderness protection to be an integral and valuable  
part of investment for the future. Simply to know these areas are there  
and protected by our government makes me more willing to pay my taxes.  
Those areas which I do visit were once applied for in a similar way and I  
respect my predecessors' efforts in finding them wilderness today and  
not overruled by private interests. That is why I do not favor the  
selling off of any of the large acreages or disposing of them in any  
way to the mining consortia.

Sincerely,

  
/Ms./ Joanna G. Ichnatowicz

cc Charles Watson

Response Number 1

Your preference for a 28,000 acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts. Your support for the Park Range WSA is noted.

Response Number 2

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.

Response Number 3

Your preference for the 57,600-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

## COMMENT LETTER 45

Mr. Merrill DeSpain, District Manager  
Egan Resource Area  
Star Route 5, Box 1  
Ely, NV. 89503

Barbara Kelley  
1850 Van Ness Ave.  
Reno, NV. 89503

December 11, 1983

Dear Mr. DeSpain,

As your office considers suitability of the four Wilderness Study Areas in the Egan Resource Area for inclusion in the National Wilderness System, I most strongly recommend some changes in your Preferred Alternatives.

First, in the Goshute Canyon area, I recommend a total of 28,600 acres in a combination of your Preferred Alternative and you Wilderness Emphasis Alternative.

I have hiked this excellent wilderness region with its extremely high wilderness values of solitude and beauty, and am concerned about protection of the Goshute Cave Geological Area, bristlecone pine forest, rare spotted bats, the beautiful Utah Cutthroat trout, and archeological sites. This area also abounds in wildlife.

Second, the 57,660 acres in the WSA for the South Egan Range would be an important addition to the Wilderness System. This area is beautiful with its limestone cliffs and forests, ft raptors, deer and other wildlife. The Wilderness Study Area eliminates mineral conflicts and it is inexcusable to omit this area from your recommendations as wilderness.

Third, I am pleased to see the Park Range included in your wilderness recommendations. The cliffs and meadows of this area are gorgeous.

Finally, I recommend inclusion of all 45,791 acres in the WSA for Riordan's Well, as well as 400 or so acres on the west that were excluded. Riordan's well is an important part of the wilderness areas including Forest Service recommended wilderness and BLM recommended Blue Eagle Mountain wilderness.

The alternative outlined above recommends all four areas be selected for wilderness, for a total of 183,091, less than 5% of the entire Egan Resource Area. This is barely a reasonable balance in the management of public lands for multiple use.

Sincerely,

*Barbara Kelley*  
Barbara Kelley

## RESPONSE TO COMMENT LETTER 45

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM does determine that the four alternatives analyzed were sufficient to adequately address the environmental impacts. The Bonneville cutthroat trout, and Goshute Cave Geologic Area are within the boundary of the Proposed Action.

Response Number 2

Your preference for the 57,600-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the scenic areas, raptor habitat, and ponderosa pine, are contained within the BLM's suitable recommendation for the area. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.



December 24, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*Ann Rosemary Kerstan*  
1650 Royal Drive  
Reno, Nevada, 89503

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

December 24, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
ELY, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,092 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*Betty Hunt*  
1426 Royal Dr.  
Reno, NV 89505

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

December 24, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
ELY, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

Prof. Carl W. Krastin

1650 Royal Dr. Reno, NV. 89503

and

Geography Dept., Univ. of Nevada, Reno, NV.

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

December 29, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Elko, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*William Kuntz*  
1550 Royal  
Reno, NV  
89503

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well USA's has been noted.

## COMMENT LETTER 50

December 24, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 181,091 acres, comprising 8.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*Bug D. King*  
1218 Patrick Ave.  
Reno, NV

## RESPONSE TO COMMENT LETTER 50

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

## COMMENT LETTER 51

December 24, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1
- 1) Goshute Canyon (28,600 acres)
  - 2) South Egan Range (57,660 acres)
  - 3) Park Range (46,831 acres)
  - 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.3% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

Laura Keaton King  
1218 Patrick Ave  
Reno, Nevada  
89509

## RESPONSE TO COMMENT LETTER 51

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well MSA's has been noted.



## COMMENT LETTER 52

423 Route 2  
Larney, Virginia 22855

November 28, 1985

Merrill DeSpain, District Manager  
Bureau of Land Management  
U.S. Dept. of Interior  
Ely, Nevada 89803

Dear Mr. DeSpain:

1 My wife and I want your records to show our strong support for the top priority your recommendations favor for wilderness in Goshute Canyon (NV-040-015), Park Range (154), and Riordan's Well (166). Also our strong hope that you will upgrade wilderness emphasis in the South Egan Range (168, 172).

Though we're not experts on these areas (a status we've come close to on some wild parts of Nevada), we've scouted them from airplanes and car quite a number of times and hiked into the Egan-Cherry Creek mountain system at intervals for many years. We feel this system has outstanding wilderness charm in quite a few places, including the study areas now involved. We've enjoyed the spectacular geology, petroglyphs, the wildlife and the vegetation, including evergreen forests and our favorite species, bristlecone pine, in impressive situations. These long-lived trees on earth generate deep feelings of the primeval in almost everyone who visits them and are the subject of innumerable photographs and of extensive scientific study in relation to climatic patterns, archeological dating, rates of erosion, secrets of longevity, and many other matters.

We'd like to see top emphasis on substantial-sized wilderness in all four areas named—something like a hundred square miles in South Egan, at least half that much in the Coalste Canyon area, and around 75 square miles each in Park Range (which amount you now recommend) and in Riordan's Well—and believe these areas could be achieved without significant hurt to other interests.

I've prospected and mined in Nevada—as well as been a working member of a Nevada ranching family—yet it doesn't seem to me that these wild interests should have top priority on more than 95% of the land. Wilderness is genuinely important in lastingly protecting the quality of the overall resource as well as for recreation and adventure for an increasing number of Americans. The proportion of wilderness priority we favor seems wise now. If it should happen not to be wise forever, the people and government of another century, in the light of needs not now predictable, could restudy and change as necessary—because we have cared enough to leave them substantial areas not yet harmed.

Sincerely,

  
Eileen and Marvin Lambert

## RESPONSE TO COMMENT LETTER 52

Response Number 1

Your support for Goshute Canyon, Park Range, Riordan's Well, and the South Egan Range as wilderness has been noted.

Box 87

Cocharo, AZ 85230

December 21, 1983

Merrill DeSpain  
Ely Dist. Mgr.  
BLM  
Star Bldg 5, Box 1  
Ely, NV 89803

Dear Mr. DeSpain:

Please enter this letter as part of the public hearing record for the Ely District Wilderness Studies.

I support a 28,600 acre Goshute Canyon wilderness, a combination of the Preferred Alternative and the Wilderness Emphasis Alternative. Goshute Canyon, containing several hundred acres of bristlecone and rare spotted bats, should be set aside with wilderness protection to preserve the flora and fauna.

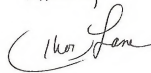
A South Egan Range 57,600 acre wilderness should be created. In addition to bristlecone pines, the area contains an unusual pit cave. Wilderness would afford protection.

I support a 45,791 acre wilderness for Riordan's Well. This area is

an important predatory bird area and  
3 wilderness would help maintain present bird populations. (2

4 A 46,831 acre Park Range wilderness should be created. One of the state's few remaining virgin grasslands is found in this area. Wilderness would help maintain the present flora which has considerable scientific value.

Sincerely,




---

 Thor Lane

3 Park Range 46, 831 acres. Rugged wild  
with few resource conflicts. Contains  
pristine meadows + grassland which  
are very much underrepresented in  
the riparian. High potential for scientific  
study of such areas.

4 Riverton's Mill 45, 791 acres.  
Semi high country. High potential  
for primitive + unconfined recreation.

Thank you for your consideration  
of these comments.

Sincerely,  
Robert W. Longmire

Response Number 1

Your preference for a 28,600-acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.

Response Number 2

Your preference for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

Your support for the 47,268-acre, All Wilderness Alternative for the Park Range WSA has been noted.

Response Number 4

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riverton's Mill WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action.

RESPONSE TO COMMENT LETTER 53

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM has determined the four alternatives analyzed were sufficient to adequately address the environmental impacts.

Response Number 2

Your preference for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Hell WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action.

Response Number 4

Your support for the 46,831-acre, alternatives for the Park Range has been noted.

COMMENT LETTER 54

BOS LANGSENKAMP  
P.O. BOX 801  
SILVER CITY, NEW MEXICO 86001  
(505) 366-4326

Mr. Marshall De Spain  
Ely Dist., Mont  
BLM  
Attn: Rm. 6, Box 1  
Ely NV 89803

12/1/83

Dear Mr. De Spain:

I would like to recommend the following areas for WSA status for the following reasons:

1. Shoshone Canyon, Area 28, 600 acres total. Slope areas are very scenic. Provide habitat for wilderness dependent species (skunk) or rare species (spotted owl). Have a geological site that would benefit by this protection, and offer high vantage for wilderness recreation. Hiking, climbing, birding, spelunking etc.
2. South Egan Mtns - 57660 acres. High peaks. High potential for unconfined recreation. Most insistent conflicts would be eliminated or minimized.

November 29, 1983

Merrill Despain,  
Ely Dist. Mgr., BLM,  
Star Route, Box 1,  
Ely, N.V. 89703

Dear Mr. Despain,

1 Your recommendations for Goshute  
Canyon with the Goshute Cave Geological  
Area, Park Range and Riordan's Well, are  
commendable. My sincere thanks.

2 Why, or what is the reason that South  
Edge Range has not been recommended?  
It is a great haven for birds and other  
wildlife, the same as the abundant  
wildlife in Riordan's Well.

I herein request that you do not sell  
or dispose of the large acreages that are  
mentioned in the Resource Mgmt Plan.

Sincerely,  
(ms) G. W. Leelandson

79 PEARCE MITCHELL PLACE  
STANFORD, CA 94305

Response Number 1

Your support for the Preferred Alternative for the Goshute Canyon, Park Range, and Riordan's Well WSA's has been noted.

Response Number 2

Your support for wilderness for the South Egan Range is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

## COMMENT LETTER 56

1850 Prior Road  
Reno, Nevada 89503

Dec. 21, 1983

Herrill DeSpain  
Ely District Manager  
BLM  
Star Route 5, Box 1  
Ely, Nevada 89803

Dear Mr. DeSpain,

I wish to offer comments on the BLM's wilderness recommendations for the Egan Resource Area. I strongly support designation of wilderness in Nevada to protect some of the wild country in our state. Your recommendations will be a very major part of that process. The Ely District BLM lands have undergone sharp scrutiny and all those areas that have conflicts or do not qualify have been eliminated. The four areas that remain all have outstanding wilderness character and the majority or all of each area should be recommended for wilderness management. Specifically, I recommend the following areas:

1 | Goshute Canyon This area is particularly scenic and has abundant wildlife values, particularly Utah Cutthroat trout, rare spotted bats and various big game species and birdlife. The recommended unit should include a combination of the preferred and wilderness emphasis alternatives, which total approximately 28,600 acres. The areas of high mineral potential in the south should be eliminated, although the preferred alternative eliminates an excessive amount of land in the southern part.

2 | South Egan Range The high Egan Range in this area should be included in the recommendation, as indicated in the 57,660 acre wilderness emphasis alternative. This unit offers rugged recreational country and excellent raptor and large game habitat. While several ways exist in the total unit (most of which are on the edge) the area retains very high wilderness character and should be recommended. Roads can be cherry stemmed and ways returned to a natural condition.

3 | Riordan's Well The 45,791 acre wilderness emphasis alternative most adequately presents the best wilderness recommendation. The unit is adjacent to the USFS recommended Grant Range and the BLM recommended Blue Eagle unit, and together, they make a particularly outstanding and large area for wilderness protection. Essentially no mineral conflicts exist. This large area is particularly valuable for recreational opportunities and is truly remote and offers unequalled solitude.

## COMMENT LETTER 56

2.

Park Range The preferred alternative for the Park Range is excellent. This pristine area, guarded by steep limestone cliffs exists as a biological resource research area. Since it has not been grazed extensively and has not been roaded, it still contains historically natural areas that must be protected and kept in their pristine condition. There are essentially no conflicts, and this area, particularly, has scientific merit, in addition to the wildlife and recreational values.

The BLM has done a good job identifying these units, and I am hopeful that each of these very valuable areas can be protected for our children over the long term.

Thank-you for considering these comments.

Sincerely,

*Glenn C. Miller*  
Glenn C. Miller

RESPONSE TO COMMENT LETTER 56

Response Number 1

Your preference for a 28,600-acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.

Response Number 2

Your preference for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

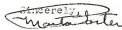
Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range BARE II areas.

COMMENT LETTER 57

December 15, 1983  
 3901 Broadway #1  
 Oakland, California 94618

Merrill DeSpain,  
 Ely District Manager,  
 Bureau of Land Management  
 Star Route 5, Box 1  
 Ely, Nevada 89703

- 1 | Thank you for considering the following areas for wilderness designation:  
 Goshute Canyon WSA  
 Park Range WSA  
 Riordan's Well WSA
- 2 | Future generations will surely benefit as well as this generation. However, I believe the South Egan Range should also be considered. I understand it is an important raptorial bird location.

Sincerely,  
  
 Marta Factor



RESPONSE TO COMMENT LETTER 57

Response Number 1

Your support for wilderness designation in the Goshute Canyon, Park Range, and Klondan's Well USA's is noted.

Response Number 2

Your support for wilderness for the South Egan Range is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

COMMENT LETTER 58

RICHARD H. POUGH  
38 HICHBROOK AVENUE  
PELHAM, NEW YORK 10803

December 2, 1983

Mr. Merrill DeSpain  
Ely District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89303

Dear Mr. DeSpain:

We are fortunate to have the Bureau of Land Management protecting so much of our country's land in Nevada. I have read with interest BLM's recommendations for Wilderness Study Areas in the Egan Resource Area and would appreciate if you would consider my comments and see that they are put into the record.

So much land qualifies as Wilderness Study Areas for inclusion into the National Wilderness System that I believe it is essential to eliminate agricultural, residential and other areas that might cause disputes now or in the future.

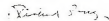
- 1 The Goshute Canyon Area has naturalness, solitude and outstanding primitive recreational opportunities. 28,600 acres, combining areas BLM recommends as Preferred Alternatives and Wilderness Emphasis Alternatives, are needed to protect Goshute Canyon, Goshute Cave and the area that surrounds Exchange Peak. The area is already used for rugged outdoor recreation.
- 2 The Park Range in the westernmost part of the Egan Resource Area justly deserves BLM's 46,031-acre recommendation. We are fortunate that virgin grasslands are still protected by the remoteness of the area here and the surrounding rugged cliffs.
- 3 The South Egan Range deserves to be included in the National Wilderness System. 57,660 acres (a BLM Emphasis Alternative), including the entire area from Brown Knoll to Sheep Pass Canyon, has outstanding wilderness values -- ancient bristlecone pines, white fir forests, nesting areas for raptors, deer habitat, limestone cliffs, caves, etc., etc.

RICHARD H. POUGH  
 93 HIGHBROOK AVENUE  
 PELHAM, NEW YORK

- 2 -

4 | Riordan's Well to the south would be my final recommendation for  
 inclusion into our National Wilderness System, stretching the  
 area recommended by BLM as a Preferred Alternative to a more  
 viable 45,791 acres. This would include part of the Grant Range,  
 Forest Service lands, Blue Eagle (recommended by BLM in another  
 resource area). 18 peaks in the range are higher than 8,000  
 feet, including Heath Peak at 9,352 feet.

Yours sincerely,



Richard H. Pough

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM has determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts.

Response Number 2

Your support of the Preferred Alternative for the Park Range 1a noted.

Response Number 3

Your preference for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 4

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

## COMMENT LETTER 59

800 Compton,  
Ely, NV 89301  
Dec. 22, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5 Box 1  
Ely, NV 89301

Dear Mr. DeSpain,

This letter is in protest of ,NV-000-015 USA,  
Coshute Canyon Wilderness Area designation

I believe the south end of this USA area does  
have mineral potential. Improvement in precious metal  
prices as well as new recovery processes have  
brought about a change in criteria for determination  
of orebody potential, during the past several years

As a former Cherry Creek resident, with mining  
claims spanning the past thirty-five years, I feel  
the interests of the people in the area, would best  
be served by maintaining this area at its present  
level of use.

Sincerely,  
Art C. Ruggie

## RESPONSE TO COMMENT LETTER 59

Response Number 1

The BLM recognizes the high mineral potential and historic mineral interest in the south end of the unit by recommending that this zone of potential is unsuitable for designation.

## COMMENT LETTER 60

720 Brookfield Drive  
Reno, Nevada 89503  
December 17, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89803

Dear Mr. DeSpain:

Thank you for the opportunity to comment on the wilderness recommendations in the Egan Area Draft Environmental Impact Statement. I believe that all four of the WSA's have outstanding wilderness values and should be recommended.

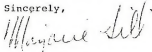
1 The speculative mineral potential in the Goshute Canyon Area should not be allowed to override the enormous value of the area as wilderness. Prime resources are the bristlecone pines, spotted bats, Goshute Cave, and the Goshute Natural Area. Eliminating most of the mining conflicts in the southern part of the WSA still leaves approximately 28,000 acres that qualify for wilderness and that will represent a unique resource in the national wilderness system.

2 The South Egan's are also an important wilderness resource with their limestone cliffs, fir forests, bristlecone pines, and myriad of caves. The 57,000 acres recommended in the wilderness emphasis alternative eliminates most mining conflicts and cherry stem roads and ways and still provides a manageable and large wilderness area.

3 Both the Park Range and Riordans Well are truly wild areas with few resource conflicts. The Park Range has pristine mountain meadows protected by spectacular rock walls. Riordan's Well is part of the large Grant Range complex and provides important habitat for nesting raptors. I support your 47,000 acre recommendation for the Park Range and ask that Riordan's Well be enlarged to approximately 45,000 acres to include all the wilderness values.

I particularly appreciate the fine work that was done by your staff in writing the descriptions of the four WSA's.

Sincerely,



Marjorie Sill

## RESPONSE TO COMMENT LETTER 60

Response Number 1

Your preference for a 28,500-acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.

Response Number 2

Your support for the 57,650-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic porcupine, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

Your support for the Park Range Preferred Alternative and your preference for the 45,701-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action.

## COMMENT LETTER 61

December 24, 1983

Merrill DeSpain, District Manager  
Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89301

Dear Mr. DeSpain:

As a long-time citizen of the state of Nevada, I feel it is my right and duty to voice my full support for the proposed wilderness areas in your district. The wilderness area concept is a far-sighted, intelligent one guaranteeing the existence of unspoiled land, air and water for all citizens and their posterity to enjoy and treasure now and forever. In addition, I give my full support to the conservationist's alternative which includes the following:

- 1) Goshute Canyon (28,600 acres)
- 2) South Egan Range (57,660 acres)
- 3) Park Range (46,831 acres)
- 4) Riordan's Well (45,791 acres)

The Conservationist's Alternative recommends all four areas be selected for wilderness. This recommendation includes 183,091 acres, comprising 4.5% of the Egan Resource Area. This alternative provides a reasonable balance between protecting the wilderness values of the Egan Resource Area and providing for other multiple uses of the land.

Sincerely,

*Wanda M. Smith*

*1850 Meadows, Ely,*

*Ely, No. 87502*

## RESPONSE TO COMMENT LETTER 61

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

Dec. 20, 1983

Merrill DeSpain, District Manager  
 Star Route 5  
 Box 1  
 Ely, Nevada 89303

Dear Mr. DeSpain,

As a resident of Nevada concerned about the preservation of Nevada's wilderness areas, I should like to voice my support for the wilderness areas proposed within the Egan Resource Area by BLM.

I support and highly commend BLM's decision to include Park Range, Wardens Well and Goshute Canyon in their Preferred Alternative proposal. I feel however that acreage in the latter two areas should be expanded. For Goshute Canyon, I endorse a combination of Preferred Alternative and Wilderness Alternative which will expand that area to 28,600 acres. This will better ensure protection of the primitive

pine forest therein, and rare/unique wildlife, and unique geologic formations.

I also support an increase in acreage for the Wardens Well area, from 37,542 to 45,741 (as stated in the wilderness Alternative), plus 400 acres on its western side.

Lastly, I should like to recommend an additional area to the Preferred Alternative in the Egan Wilderness Area. The South Egan Range (57,400 acres) should also be considered because of locations of primitive pine and unusual geologic formations (e.g. Angel Cave).

I support inclusion of all four areas above for designation to

COMMENT LETTER 62

wilderness status. The total area includes 183,091 acres, representing 45% of the Egan Resource area, and will adequately protect the wilderness of the Egan Resource Area, while accommodating other land uses. Thank you for your attention.

Yours sincerely,

Shirley Danks Smith

RESPONSE TO COMMENT LETTER 62

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM has determined the four alternatives analyzed were sufficient to adequately address the environmental impacts.

Response Number 2

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted.

Response Number 3

Your support for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, bristlecone pine, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.



## COMMENT LETTER 63

John R. Swanson  
P.O. Box 922  
Berkeley, Calif. 94701

December 15, 1981

Egan Resource Area - Bureau of Land Management  
Ely, Nevada 89301.

Dear Sirs:

Please accept my comments, as follows, concerning -  
\*Egan Draft Resource Management Plan and Environmental  
Impact Statement

I have been acquainted with this area of Nevada for nearly a half-century and certainly agree that this - now - Egan Resource Area features certain outstanding Wilderness, scenic, wildlife, botanic and cultural resources of particular national interest.

As it contains significant national natural heritage lands; areas that provide a lasting refuge for all Life, including Man, on this decimated planet.

The purpose of Each Unit of all of our Public Lands: local, State and Federal, is to Preserve each such unit. So, then, establish each and every Public Lands Unit into a lasting Preserve. To permanently preserve such units, Wilderness, scenic, wildlife, fish, botanic and cultural resources.

Each Preserve to protect, strengthen and expand Wilderness, preserve watersheds, protect ecosystems, save and enhance wildlife - fish and their respective habitats, protect and to promote biological diversity and to restore - recover - all used - damaged areas back to their respective natural environmental condition.

To accept that Wilderness is the foundation of all Land-Water Resources. With the primary goal of all land-water resources planning and management to protect, strengthen and expand Wilderness.

1 I Urge that the following areas - acreages located on this Egan Resource Area - Only - Bureau of Land Management administered areas - only - receive permanent Wilderness classification, at this time:

2 \*Park Range 54,217. \*Goshute Canyon 41,426.  
\*Picardan's Well 65,103. \*Mount Grafton 85,362.  
\*South Egan Range 114,849. \*Central Egan Range 52,807.

3 \*Plus, to add to this - above - acreages - areas some (at least) 105,000 Acres located on this Egan Resource Area - Only -; lands administered - only - by the Bureau of Land Management.

## COMMENT LETTER 63

2

To total (at least) about 805,000 acres and to be added to our National Wilderness Preservation System representing only Bureau of Land Management administered areas - Egan Resource Area.

To establish this Resource Area as the Egan National Land Preserve.

To Ban - permanently - all forms of surface and sub-surface development on all current, proposed and potential Wilderness, including, Roadless Areas - Wilderness Study Areas. With No Release of any Roadless - Wilderness Study Areas; as they are to be added as Wilderness.

To acquire all Inholdings on all Public Lands, With No Disposal of any Public Lands.

To eliminate the use of all Off-Road Vehicles.

And to adopt, permanently, Alternative P - for Preservation - as the management plan and program for this Egan Resource Area.

For when we save our natural lands and waters - including Wilderness - we save America!

Sincerely,

J. R. Swanson

[This letter was retyped by the BLM since the original could not be reduced in size without being illegible.]

## COMMENT LETTER 63

John R. Swanson  
P.O. Box 922  
Berkeley, Calif. 94701

December 15, 1983

Ely District Office - Bureau of Land Management,

Star Route 3, Box 1  
Ely, Nevada 89301

Dear Sirs,

Please accept my comments, as follows, concerning -

\* Egan Wilderness Technical Report.

I have been acquainted with this portion of Nevada for nearly fifty years; and for many decades have held the firm opinion that this - now current - Egan Resource Area contains outstanding wilderness, scenic, wildlife, botanic, and cultural resources of certain national significance. Land and water units that form an important segment of our nation's natural heritage. Areas that provide a vital and as all Americans hope, a lasting refuge for man, and for all life, on this endangered planet.

I urge that the following areas - acreages located on this Egan Resource Area - Bureau of Land Management administered lands - Only - be fully classified and permanently protected as wilderness; as Each such unit features superb wilderness attributes and to be included - added - to our National Wilderness Preservation System, at this time.

- \* Park Range 54,217
- \* Riordan's Well 65,103
- \* South Egan Range 114,849
- \* Goshute Canyon 41,426
- \* Mount Grafton 85,362
- \* Central Egan Range 52,807

\* And to add, an additional, 385,000 acres of Wilderness located on this Egan Resource Area - Bureau of Land Management administered lands - Only -.

\* Total some 805,000 acres of Wilderness representing this Egan Resource Area - Only - administered only by the Bureau of Land Management -.

To permanently Ban all forms; surface and sub-surface development on all current, proposed and Potential Wilderness, including all Roadless Areas - Wilderness Study Areas. With No Release of any Roadless Areas; as they are to be added as Wilderness.

To acquire all Inholdings on all Public Lands.

With No Disposal of any Public Lands, as they are to be retained.

Also, to Ban all Off-Road Vehicles as they destroy land resources.

And when we save Wilderness;  
we save America!

Sincerely,  
J. R. Swanson

(This letter was retyped by the BLM since the original could not be reduced in size without being illegible.)

## RESPONSE TO COMMENT LETTER 63

Response Number 1

Your support for wilderness designation for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

Response Number 2

The Mount Grafton WSA was studied in the Schell Wilderness Draft EIS, made public April 8, 1983.

Response Number 3

All roadless areas in the Egan Resource Area were inventoried for wilderness characteristics. The four wilderness study areas considered in this document and the Egan Wilderness Technical Report were the areas determined to contain wilderness characteristics. Only these may now be considered for wilderness designation.

COMMENT LETTER 64

2684 Canyon Crest Drive  
Escondido, California 92027

January 23, 1984

Merrill DeSpain, Ely District Manager  
Bureau of Land Management  
Box 1, Star Route 5  
Ely, Nevada 8903

Dear Sir:

All of us in the western half of the United States have become increasingly aware of the importance of preserving our birds of prey and their natural habits. Therefore, we appreciate the attention the BLM is giving to the recommendation of new wilderness areas in the state of Nevada.

I have recently learned that one excellent candidate for wilderness designation was not included, even though it is comparable to Borden's well, as a bird of prey refuge--South Egan Range. Please reconsider this area.

In closing I would like to state that I am not in favor of selling lands within your district.

Sincerely,

*Mary Jeanne Terrasas*  
Mary Jeanne TERRASAS

RESPONSE TO COMMENT LETTER 64

Response Number 1

Your support for wilderness designation for the South Egan Range is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational development and would be managed in a manner to preserve those special values.

COMMENT LETTER 65

RESPONSE TO COMMENT LETTER 65

December 20, 1983

Dear Mr. DeSpain,

Please support the conservationists

ALTERNATIVE which includes <sup>6</sup>Goshute Canyon,

the 46,911 acres of the <sup>200</sup>Park Range, the

45,791 <sup>300</sup>ALTERNATIVE OF RICHARDSON'S WELL, AND

THE ADDITION OF THE <sup>6</sup>SOUTH EGAN RANGE, 57,660

ACRES FOR WILDERNESS DESIGNATION.

THANK YOU VERY MUCH.

Sincerely,

STEVEN THAM

Box 2798

STATELINE, NEVADA

89449

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Richard's Well WSA's has been noted.

COMMENT LETTER 66

December 14, 1983

Mr. Merrill L. DeSrain  
Ely District Manager  
SR 59, Box 1  
Ely, NV 89301

Dear Mr. DeSrain:

1 Alternatives B and E seem to be very similar and would seem to be the best of the lot as they are the most protective of our precious wilderness and wildlife values.

What is protected now could be exploited at a later date if we were ever to be in extremis but it is extremely difficult to restore values which have been damaged.

With the present administration which often talks well but is shortsighted and mainly interested in special interests profits wilderness and wildlife interests need all the protection they can obtain to protect the country as a whole.

Yours truly,

*Edith W. Thorsley*

Ms. Edith W. Thorsley  
1803 Schuster  
Drexel, NE 68528

RESPONSE TO COMMENT LETTER 66

Response Number 1

Your support for Alternative B and E (all Wilderness) has been noted.

## COMMENT LETTER 67

2092 Heritage Cakc  
Las Vegas, Nevada 89109  
December 1, 1983

Merrill DeSpain  
Ely District Manager  
U.S. Bureau of Land Management  
Star Route 5, Box 1  
Ely, Nevada 89803

Dear Mr. DeSpain:

This letter is in support of wilderness recommendations for portions of four #SA's within your district: Goshute Canyon area, South Sean Range, Park Range, and Hierdan's Well. This letter also will register my concern with the Bureau's assessment of mineral potentials, or mineral resources, within #SA's. Further, I wish to express my opposition to the sale of public lands.

I am in sympathy with any attempt to consolidate public and private lands for better land management practices. I also am in favor of allowing "land locked" Nevada communities some public lands so the communities may expand and prosper. I am not in favor of the sale of public lands to accomplish these objectives unless an approach similar to the "Santini-Burton" approach is used. (I had a part in the passage of the Santini-Burton bill which, as you probably are aware, was used to allow the city of Las Vegas to expand while critical, environmentally sensitive lands in the Lake Tahoe area were purchased.) When the proceeds of public land sales merely go to the general fund of the Treasury Department, and private lands await Federal Funds for purchase, I am strongly opposed to the Bureau selling valuable public lands. I urge your district to give some thought to the land exchange option, and also to the passage of "Santini-Burton" legislation that would allow the consolidation of both public and private lands when land exchanges prove to be too lengthy or unproductive.

1 The Bureau in many of its EIS's has attempted to determine the value of the mineral resources within a #SA without regard to the overall quantity and value of those resources that lie outside the #SA. Further, the Bureau has prejudged the U.S. Geological and the Congress in determining the relative value of those resources. I urge the Bureau to consider the available information on minerals within a #SA, but leave the final evaluations to the U.S.G.S. and Congress.

## COMMENT LETTER 67

3 I support the recommendations that a combination of the "Preferred Alternative" and the "Wilderness Emphasis Alternative" be considered for the Goshute Canyon area. The 5009 acre Goshute Canyon Natural Area together with Echoequer Peak and the Goshute Cave should be included in any recommendation.

4 Although the South Sean Range has not recommended for wilderness, I believe the area described in the "Wilderness Emphasis Alternative" should be recommended for wilderness. Most of the mineral conflicts and road-access conflicts have been eliminated in the Alternative, and I see no reason why the BLM should exclude this area from its wilderness recommendation.

5 The 46,831 acres recommended by the BLM for wilderness in the Hierdan's Well area, I see no reason why the recommendation. The ungrazed meadows and grasslands in this area are a unique characteristic of this area.

6 While I support the BLM's recommendation for wilderness in the Hierdan's Well area, I see no reason why the "Wilderness Alternative" was dismissed. I recommend that the BLM reconsider it's decision and adopt their "Wilderness Alternative" for this area.

Thank you for the opportunity to comment on this important topic for your district.

Sincerely,  
*Walt van Be*  
Walt van Be

RESPONSE TO COMMENT LETTER 67

Response Number 1

Resource area-wide surveys are desirable for conducting wilderness studies, but in the case of the Egan studies were impossible to attain because of funding and timeframes. (They have been available for other studies, such as those for the Schell Resource Area in the Ely District.) There is nonetheless some implicit judgment about the relative abundance of outside opportunities in the selection of the Proposed Action and in the statements about its impacts on energy and minerals.

Response Number 2

The Federal Land Policy and Management Act of 1976 directed the Secretary of the Interior to have a mineral survey completed by the USGS/Bureau of Mines on all areas recommended as suitable for wilderness. This survey is done completely independent of the BLM. If, when these mineral surveys are complete and new information is brought forward which would require the proposed sections in this document to be changed, an amendment to this final EIS would be written. Congress is, however, in no way constrained by the BLM's recommendations.

Response Number 3

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts.

Response Number 4

Your support for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 5

Your support for the Preferred Alternative for the Park Range has been noted.

Response Number 6

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted.

300

COMMENT LETTER 68

1835 Clearcreek Lane  
 Reno NV 89572  
 October 28, 1983

Mervell De Spain, Esq.  
 Law Office  
 Box 1, Ely NV 89303

Dear Mr. De Spain,  
 In regards to Draft EIS regarding Park Range, Ashute Canyon, Rio-dan's Well, I commend your courage in recommending these areas and urge you to increase their acreage as recommended by the conservationists alternative. We have lived in Nevada for over fifteen years. My 5 children grew up here and value its wild beauty. We realize the needs of miners and ranchers but feel the proposed acreage set aside does not threaten either interest. As the hearing concerning these lands is heard,

1



people complain that the  
land will no longer be  
available to senior citizens  
- phooey - I'm fast ~~approach~~  
approaching senior citizen  
status and I can still  
hike in the wilderness,  
climb Mt Rose and feel good,  
when my children or others  
conquer more difficult terrain  
and come back to tell me of its  
beauties.

The fact I am a scientist  
also influences my decision  
to support wilderness design-  
ation for these areas. Too  
often we have rushed  
into develop when we were  
not ready to do so. Preser-  
vation of these areas will  
allow future generations to  
enjoy and study these  
pristine lands who knows

what they'll learn, given  
improved tools and methods,  
if only we can preserve  
this land as is.

Thank you for your  
consideration

Sincerely  
Ferry Woodin

RESPONSE TO COMMENT LETTER 68

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Rierdon's Well WSA's has been noted.

302

COMMENT LETTER 69

21 Dec 1983

Merrill DeSpain, Mgr.  
Ely District, BLM  
Star Rt. 5, Box 1  
Ely NV 89803

Subject: Wilderness Proposals, Egan Resource Area

Dear Mr. DeSpain:

In considering the question of wilderness I believe the BLM is obligated to consider the question of "balance". In considering the balance of a wilderness proposal it is necessary to remember that the wilderness values of most of the public lands have already been destroyed. The hand of man rests very heavily on the West, on Nevada, and on the Ely District. This lack of balance in the current situation probably can't be changed. It certainly must be considered by the BLM in establishing wilderness recommendations. Even if you recommended as wilderness every roadless acre in the district you would still have a balance tipped against natural values. This lack of balance in the current situation mandates wilderness recommendations unless you are faced with overwhelming conflict unresolvable without development. Such a situation is not established for the Egan Resource Area.

Wilderness recommendation is thus the most balanced recommendation possible unless you are willing to recommend that roads be closed and natural values be restored to lands now developed. Even Wilderness recommendation represents a loss of natural value to development. This bias to development is the result of the BLM's Wilderness Management Policy which seems to protect natural values only if it is not inconvenient to the needs of man. But, discussion of the Wilderness Management policy is relevant here only in that the accommodations to development found in that policy render absurd any statement that a Wilderness Recommendation exacts an uncompensated "cost" from users of the public lands. In fact, one could administer as Wilderness a majority of the District without exacting any costs except those needed to respect the long term needs of the land. Since it is not possible to ignore or escape those "costs" they should not be a factor in a wilderness decision.

My comments on your proposal are made in the context on your need to achieve a balance of values as explained above.

## COMMENT LETTER 69


1) In the South Egan Range you should look to and adopt the Wilderness Emphasis Alternative. The wilderness and natural values are clearly shown in the inventory. This area should be protected, and can be protected without serious conflict.

2) In the Riordan's Well area one finds important natural values. Since the conflicts are insignificant I suggest your recommendation for wilderness be expanded by 8,000 acres.

3) Your recommendation for the Goshute Canyon area appears to be heavily influenced by speculation about possible mineral potential. The Wilderness and natural values are real. They exist now. They are not speculation. They are fragile and perishable. Your wilderness recommendation for this area should be at least 28,000 acres.

4) Congratulations! Your proposal for the Park Range shows respect and recognition for the unique accomplishment represented by that area. Any grassland area that can survive 100 years of "stewardship" by the cattle industry deserves a chance to continue. Legislative designation as wilderness would only be legislative acknowledgement of what nature herself has done: create a remote pristine area inaccessible to the benefits of human attention. I support your proposal.

Thank you for the opportunity to comment on your wilderness recommendations.

  
Charles C. Foder  
1238 Camelot  
Boise, Idaho 83704

## RESPONSE TO COMMENT LETTER 69

Response Number 1

Your preference for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted.

Response Number 2

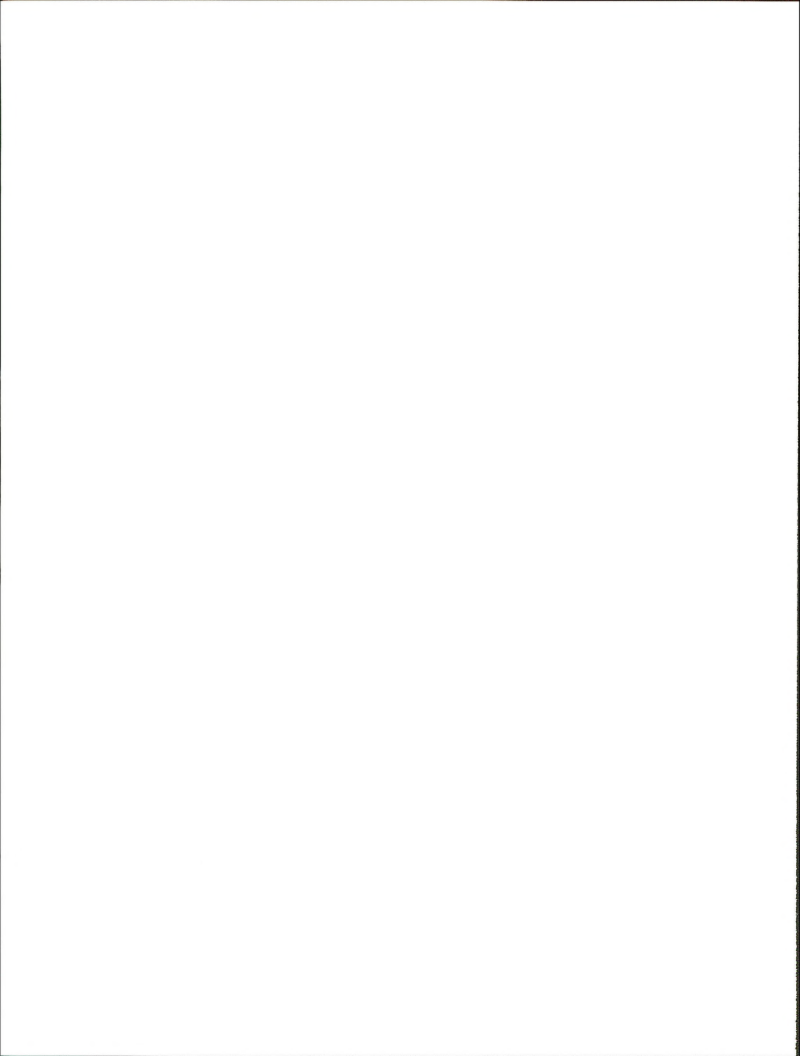
Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scent areas, and ponderosa pine are still contained in the Proposed Action.

Response Number 3

Your preference for a 28,000-acre alternative for the Goshute Canyon WSA has been noted. The BLM determined that the four alternatives analyzed in this document were sufficient to adequately address the environmental impacts.



## ORAL TESTIMONIES



TESTIMONY 1

MR. IVERSON: My name is Paul Iverson, Carson City, Nevada. I represent the newly created Nevada Department of Minerals.

The Nevada Department of Minerals has several concerns relating to the Egan Resource Management Plan and Environmental Impact Statement.

A primary concern is a proposal to close several sections of land in which there are currently or have in the past been exploration activities also areas having potential for geothermal development and sections of land under oil and gas leases.

The department is also concerned about the designated mineral potential as stated in the draft documentation. We believe that an area's true mineral potential can never be fully known until actual mining and exploration occurs. In many cases the major mineral deposits are overlooked or ignored until new technological breakthroughs or shifts in industrial needs suddenly transform an area which seemed to have little or no mineral potential into a prime exploration target.

From our viewpoint, wilderness study areas should only be considered if an area has no mineral resource potential and that that is, areas with significant geological data to indicate the lack of favorable host rocks or mineral resources given today's mining technology and, of course, present and predicted economic conditions.

TESTIMONY 1

Furthermore, the department feels that if any area has favorable mineral potential that is to be recommended as wilderness, it should only be because, one, there are no alternate sites, with no mineral potential or two, if intense U.S. Geological Survey or U.S. Bureau of Mines study has been conducted at a sufficient level of detail to reclassify the area as having no resource potential.

The Nevada Department of Minerals would like to emphasize the fact that preserving and expanding the mining industry in the State of Nevada is considered a major element in the Governor's economic development program.

The department feels that wilderness designation of such areas as those in the Egan Resource Area would be in direct conflict with the State's economic development plan. The Department of Minerals remains an active participant in the clearinghouse process by reviewing and analyzing proposed wilderness study areas with other State agencies and negotiate with them on important issues such as mineral potential. Since different agencies are concerned with various issues the negotiation process provides for State consensus resulting in the drafting of a recommended State policy which is submitted to the Governor for his review and final approval.

As a closing statement, the department does value preserving some public lands for future generations and scientific study as long as the



## TESTIMONY 1

mining industry which is so essential to our national defense and this State's progressive economy can remain healthy and be provided the opportunity to pursue new mineral resources.

Thank you.

## RESPONSE TO TESTIMONY 1

### Response Number 1

All areas are candidates for wilderness designation, whether they have high, moderate, low, or no mineral potential.

### Response Number 2

Although contemplating geochemical and geophysical studies can be conducted to assess mineral potentials, in order to determine that an area has no mineral resource potential, its naturalness and other values would have to be impacted by extensive exploration. To do so in the search for suitable wilderness areas could paradoxically destroy the resource that is being considered for protection. This, of course, would thwart the original interest of Congress when it established the National Wilderness Preservation System. Furthermore, the Congress did not indicate any intent to prohibit designation of areas with mineral potential. Instead, it mandated an extensive mineral survey for all areas prior to designation so that a reasoned and knowledgeable balancing of values could be conducted. Where it appears that wilderness values outweigh mineral (and other competing resources) values based upon the best available information, then wilderness designation is indicated. No single resource will always have priority in these management recommendations.

### Response Number 3

The proposed actions recommend that 106,216 acres, or 2.8 percent of the Resource Area be designated as wilderness. This leaves 97.2 percent of the Resource Area unaffected by wilderness designation. This is not considered to be an excessive recommendation. The economic and social impacts which would result from the recommendation have been thoroughly considered. All available information indicates that impacts would be insignificant to all sectors of the local and state economies.

## TESTIMONY 2

MR. DELGROSSO: It's only going to take  
a second.

As Paul Iverson mentioned  
the State is getting together the various departments and  
divisions to consider wilderness proposals and one of the  
reasons we are here tonight is to get input from the local  
people, get their feelings. And we're a little bit  
disappointed there weren't more comments made. But what  
we have heard has been helpful. Thank you.

## RESPONSE TO TESTIMONY 2

Response Number 1

Thank you for your comments.

MR. WARREN: My name is Bob Warren. I'm the Executive Secretary of the Nevada Mining Association. The Mining Association has some 730, I guess, up to this time, members. Sixty of them are the larger corporations; the AnaconJas, Kennecotts, and Duvals.

The larger operating mining companies in Nevada upon which the rural communities depend for their economic sustenance--others are individuals who are interested in mining--hope to be someday prospectors, hope to be someday producers and suppliers of equipment and supplies, and mining law attorneys.

A large number of them are also small exploration firms; some of the largest exploration firms in the nation and some of the most sophisticated in the world.

We, also, I feel, represent directly the people who live in our rural areas in Nevada who must depend upon mining and ranching for a long-term economic liability; the families, their children, their cousins, and all of the people who depend upon a strong economic base for continued high quality of life, which they hope to preserve in Nevada.

My final statement is not to be interpreted by the individual staffers of the BLM as critical of them as individuals. I respect your integrity and your professional competence, and you know that I do.

I think, however, that my remarks will demonstrate that you are victims of the system.

A careful reading of the Draft Resource Management Plan in the Environmental Impact Statement leaves the Nevada Mining Association to reluctantly conclude the judgmental elements of this report are heavily biased toward creation of wilderness at the expense of the development of the resource

potential of the proposed wilderness areas.

The judgments that flow from this systemic bias will irretrievably injure the economic viability of the communities near these sites. This built-in bias toward wilderness is probably not evident to the BLM professionals who prepared this document, because it flows logically from certain key assumptions in the planning process. The result, however, unfortunately, is an anti-mining document.

These two assumptions: Assumption one, the rating system to determine mineral potential is prejudicial and unprofessional according to top exploration geologists, many of whom are located in Reno, because Nevada is now considered one of the prime targets for mineral potential in the entire United States and, indeed, in the world, we have firms here from Belgium, South America, France, Germany, England. We have the top talent, the cream of the talent in the state.

A high rating for mineral potential is given only if the area shows favorable geological characteristics. Of course, that would be appropriate. And if the area is contained or are extensions of active or inactive properties which show evidence of ore for mineralization. In other words, to rate high. And if you are not high you are not to be considered a candidate for wilderness. To rate high there must have been previous evidence of mining -- evidence of previous mining.

Based upon this flawed rating system, such major mineral areas such as Freeport's World-Class Gold Mine in Elko City and the U.S. Steel Corporation's discovery of nearly two billion tons of high-grade ore east of Yerington, do not qualify as areas of high mineral potential. Yet, these are some of the most significant discoveries made in the last ten years in Nevada.

TESTIMONY 3

Face it, we wouldn't qualify under the definition of high mineral potential in the BLM's rating system. In similar "non-mining areas" today, other important discoveries of minerals and resources are being made. They are the results of today's sophisticated geologic models and geologic concepts; thus, the built-in bias number one:

3 The BLM staff cannot properly rate an area's mineral potential under the system. Areas with potential for production are thereby automatically underrated and become candidates for wilderness.

4 Assumption number two: There are only two of them that I am commenting on that have created this systemic bias. Quoting from the page 105 of the draft EIS, we find the following assumption: "There would be minimal overall impacts on the local non-ranching community," if we were not permitted to mine, in other words.

5 If the exploration for the production of mineral resources is forfeit, there would be forces - there will be minimal overall economic impacts on the local non-ranching community. I will offer evidence later to demonstrate the fallacy of this assumption.

6 But with such an assumption as planning guidelines, and it is one of the planning guidelines, BLM staff has found it 4 much more comfortable to make the judgment that wilderness values outweigh the benefits that would flow from future mineral production.

5 Speaking specifically to this Egan draft, may I point out the erroneous conclusions that have resulted from these two erroneous planning assumptions? For instance, in the analysis of the Park Range, the technical draft states, Page 11:

TESTIMONY 3

"Wilderness values are high and in nearly all cases take precedence over current or potential incompatible uses."

BLM can support such a conclusion when it is based upon an assumption of only minimal economic impact on the Nevada communities when the future of mineral production is forfeit.

The analysis of the Riordan's Well states also: "Wilderness values are limited" -- and they don't point out that they are limited -- "but appear to be the highest and best use for the core of this area."

6 This statement, despite the high mineral potential of this area, which I will document again in our program, and I am quoting, again, "The wilderness values were of more importance than a moderate potential for minerals based on a geologic inference."

2 But the conclusion of "moderate potential" is based upon the faulty definition of what is high or moderate mineral potential. It flows, again, in part from built-in bias number one: That there must have been previous mining to rate as high potential.

7 And we all know that is no longer a proper geologic determination. The best discoveries in Nevada are being made in areas that had no exploration previous and no evidence of previous mining.

To comment on the Goshute Canyon, we find the same bias in the analysis of the Goshute Canyon. The analysis states: "It was decided that known high wilderness values in this situation outweighed an unknown potential for mineral resources."

Here again, the two key planning assumptions lead to inaccurate conclusions. The minerals rating system

fail to recognize the mineral potential, and it was assumed that forfeited mineral production is of minimal concern to persons living within that county. Thus, BLM staff is able to conclude that wilderness is the highest use of the land.

Quoting from a report prepared at BLM's request by the Nevada Mining Association, BLM asked us to review the G&I report, which was contracted for by BLM, to review the areas. It was largely literature search and BLM recognized that. So they asked me to put together some of the top exploration jobs in the world and in Nevada. I did so. I did so, and about nine of them reviewed the report and found that because it was limited to a search of literature, primarily the officers didn't have a chance to get out in the field, but they had terribly understated some of the potential.

For instance, in the Goshute Canyon area the nine geologists concluded this, and I am quoting from the report: "High exploration potential for precious and base metals."

Listen to this: "The formation names of units in the Cherry Creek Range sounds like a "Who's Who" of host rocks for major ore bodies."

8 Yet, the conclusions of the BLM, EIS and the U.S. management report says this is an unknown potential and, therefore, it cannot be considered as a component weight against the wilderness values.

Let me move now to more specific comments which will be backed again by documentation entered into your record.

2 Back again to assumption number one, a high mineral potential rating is limited only to areas of previous

mining or evidence of mineralization. BLM's own geologists know that this is untrue. I had talked to some of them about this. They are disturbed about the trap that has been laid for them, because all of these guidelines were laid down by a previous administration at a time when there was not only a systemic bias towards the creation of wilderness, but there was a political bias at that time.

I suggest that BLM's management -- because the geologists don't need to do that -- confer with the Nevada Bureau of Mines and Geology and other geologists identified in my exhibits, and those geologists that put this report together are some of the people from Noranda Exploration, the eighth largest mining company from the United States; from the Anacosta, from the Freeport Exploration, from Asarco, and several of the independent jobs including the former professor of the Mackay School of Mines.

I would suggest that the management confer and find out the true feeling about what is and what is not a proper tool to identify mineral potential in an area. I will also place some testimony in the report requested by BLM from the Nevada Mining Association. This is the report I just told you about.

9 We did this, and we find that the limited report of the dealing contract based upon the dollars available, simply wasn't able to identify mineral potential. We urge, therefore, that BLM adopt a more professionally recognized rating system for mineral potential.

10 And we likewise urge BLM to make use of the information compiled by BLM's team of nine skilled geologists, and I will submit that into the record.

TESTIMONY 3

Finally, we urge BLM also to re-think assumption number two; that the loss of future mineral production will have only "a minimal overall impact on the local non-ranching mining community." I can put it in parenthesis that if you are talking about ranching community, it is also going to have an impact on the ranching community. Because Nevada ranchers know. They do not believe the statement by the Federal Government that if you create a wilderness you will be able to continue to raise your cows, continue to have access to your water wells and to your tanks. They know better.

11 | And the Cattlemen's Association of Nevada and Natl. Cattlemen have resolved repeatedly that they are terribly concerned about setting these areas aside for wilderness, because they know eventually it will severely cripple the cattle industry.

These assumptions have robbed BLM of the objectivity it needs to evaluate which public lands should be closed to mineral production if continued -- And it has gone on with the previous reports; that was, the same systemic bias has continued - this statewide bias will severely injure the economic viability of Nevada's rural communities which must depend upon ranching and mining for the next 100 years or more as a source of employment, income, tax revenues, and the economic vitality that can contribute to the high quality of life for Nevada's rural citizens.

12 | We are talking about wilderness to contribute to the high quality of life for the hikers. We ought to consider the high quality of the life to the rural citizens who live in the areas

The necessity of continued mining and, therefore, access to future mineral deposits, is documented by a recent study by three University of Nevada economists, published by the

TESTIMONY 3

Bureau of Business and Economic Research -- and I will submit this into the record tonight -- the report is entitled "An Analysis of the Economic Impact of the Mining Industry on Nevada's Economy."

If someone would like to know about the importance of the mining industry to the rural community, you need to review this highly professional report.

13 | If BLM fails to correct this bias toward wilderness built into the statewide wilderness evaluations system, the agency will severely injure the long-term interests of the ranching industry, as I had pointed out, the interest of vehicle orientated recreationists who need more, not less, access to Nevada's mountain playgrounds; the interest of hunters who can no longer drive into some of the best hunting areas in the State; and, of course, the mining industry which must mine where nature created and exposed ore deposits, not deep beneath Nevada's valleys and dry lake beds.

THE HEARING OFFICER: Would you conclude --  
MR. WARREN: Yes. I have one paragraph left.

12 | Nevada's preservationists are asking for exclusionary use of up to five percent of the public lands. Mining would be happy with one-tenth of this to mine. Our activities disturb about a scratch of a chicken in a large football field.

Nevada's ranking geologists recognize that some 70 percent of this land being proposed for wilderness has high potential for mineral production. And, in fact, some of it is probably the most favorable area in the State. Inasmuch as there are 70 percent, there still are 30 percent probably that would not have high potential; that would be an ample area, considering all of the wilderness areas, some hundred areas of Nevada in consideration for wilderness.

## TESTIMONY 3

If 30 percent belonged to the Forest Service and the Department of Fish and Game, Wildlife, and the Federal Department were put together, there would be a vast wilderness area in the State without injuring the mining and ranching industries.

My final comment, please don't forfeit the long-term interests of Nevada's rural mining communities for a trickle of Nevada and out-of-state hikers who seek a "wilderness experience" without concern for the obvious injury to the economy and quality of life of rural Nevadans.

I will submit these documents for the record.

Thank you.

13

## RESPONSE TO TESTIMONY 3

### Response Number 1

The proposed actions recommend that 106,216 acres, or 2.8 percent of the Resource Area be designated as wilderness. This leaves 97.2 percent of the Resource Area unaffected by wilderness designation. This is not considered to be an excessive recommendation. The economic and social impacts which would result from the recommendation have been thoroughly considered. All available information indicates that impacts would be insignificant to all sectors of the local and state economies.

### Response Number 2

The definition for high mineral potential used by the Great Basin GEM Joint Venture, an independent group contracted by the BLM to rate potentials in Nevada WSA's, reads as follows:

The geologic environment, the inferred geologic processes, the reported mineral occurrences, and the known mass or deposits indicate high favorability for accumulation of mineral resources.

This definition allows for a high rating in previously unmined areas. The findings of the GEM Joint Venture were accepted by the BLM largely without change, so that the above definition of high potential supercedes the one listed in the Egan Wilderness Technical Report. All areas found by the GEM Joint Venture to have high mineral potential are shown on maps and reported in the text of this document.

### Response Number 3

All areas are candidates for wilderness designation, whether they have high, moderate, low, or no mineral potential.

### Response Number 4

The quote from page 105 in the Draft Resource Management Plan is not a generic assumption, it is a conclusion about the specific proposals contained in the Preferred Alternatives: there would be "minimal overall impacts" as a result of designating production and on other components of the local economy have been given due consideration in the Egan Wilderness Technical Report, and will continue to receive treatment in the mineral surveys conducted for the suitable areas.

### Response Number 5

The selected statement referred to here comes from the "Alternatives" Chapter of the Technical Report, not the "Environmental Consequences" Chapter. The statement describes the guidance used to formulate one alternative for one area. The analysis of impacts which follows concludes, indeed, that wilderness designation for the Park Range (46,831 acres) would not significantly affect the minerals industry. This conclusion applies only to this area in this alternative. It is not a generic assumption about wilderness designation's impacts on the industry.

### Response Number 6

The best available information indicates low to moderate favorability for mineral accumulation in the Jordan's Well WSA.

### Response Number 7

This quote, taken out of context, refers to the formulation of alternatives, not the assessment of impacts. It refers to one part of the Goshute Canyon WSA, not the entire area. The same paragraph states that "the southern third is recommended unsuitable because of a combination of high and moderate favorability." The BLM is fully aware of the importance of mining to the local economy.



## RESPONSE TO TESTIMONY 3

### Response Number 8

The GEM report for the Goshute Canyon USA lists high mineral potential in the south end of the area, and moderate potential for much of the remainder. This information was incorporated in the Wilderness Technical Report, the RMP, and this document, and is directly responsible for the delineated configuration of the prehistorically suitable part of the USA.

### Response Number 9

The assessment of mineral potential has been given top priority in the wilderness studies. Not only is this policy, it is mandated in the Wilderness Act and the Federal Land Policy and Management Act. The best information available to the BLM at this time indicates that withdrawal from mineral entry of the 2.8 percent of the Resource Area contained in the suitable areas would affect the mining industry very little. However, this analysis is just the beginning. Every area that is found suitable for designation must undergo an extensive mineral survey conducted by the U.S. Geological Survey and the U.S. Bureau of Mines. New findings can affect the suitability recommendation for any USA. The redundancy and intensity of minerals impact analysis is designed to avoid any major economic dislocations.

### Response Number 10

We have incorporated your report into the Final EIS.

### Response Number 11

The Nevada Cattlemen's Association, in a letter dated 1983 supported wilderness designation in four (unspecified) roadless areas in the Egan Resource Area. This letter is on file at the Ely District Office.

### Response Number 12

Wilderness is not an exclusive use of the land. Livestock grazing, for example, will be allowed to continue at present levels. The benefits of designation may also be wide-ranging, affecting resources such as wildlife, watershed, and social values of long-standing.

### Response Number 13

The BLM believes that the wilderness recommendations for the Egan Resource Area are reasonable response to the Congressional mandate contained in the Wilderness Act and the Federal Land Policy and Management Act. By recommending that 2.8 percent of the Resource Area be set aside as wilderness, the BLM is contributing to the establishment of "an enduring resource of wilderness" for "the permanent good of the whole people," not just for a few "Nevada and out-of-state bikers." These recommendations come only after extensive consideration of their effects on other resources and uses, and are subject to modification after still further study.

## TESTIMONY 4

MR. WATSON: My name is Charles S. Watson, Jr., Director of the Nevada Outdoor Recreation Association. The headquarters are in Carson City, Nevada. We are an organization of approximately 400 members, not only in Nevada, but in 17 other states.

The main thrust of our organization is in support of the continued existence of the public lands and public ownership. We also exist for the support of the Federal Lands Policy Management Act.

\*\*\*  
Those are now our wilderness recommendations:  
Number one, Goshute Canyon. We endorse a combination of the preferred alternative and the wilderness emphasis alternative. We have visited this exceptional and unique wild land. The existence of the native trout streams and such wonders as the Goshute Cave were first inventoried by NORA in our NORA Index and Survey nearly 20 years ago.

In the mid-1970s, we again visited the canyon with BLM personnel and actually observed the native fish in the Goshute Creek area. We came away truly astonished and impressed with its geological, botanical, archeological and wildlife attributes.

The area has rare spotted bats, Utah cutthroat trout, ancient Bristlecone pine forests and truly spectacular cliffs and canyons. We urge preservation of 28,600 acres.

The South Egan Range: We are very concerned and perplexed over the failure of the BLM to include this area in its preferred alternative. We know of stunning sets of towering bluffs, hidden gorges, white fir forests from Brown Knoll to Sheep Pass Canyon. Again, this area contains ancient Bristlecone pines and an unusual pit cave -- angel cave -- near the top of the range.

The Egan Range is known to us as an important habitat for predatory birds. All too often, we have seen the BLM indicate that "ways" both in and outside of the WSA constitute "substantial" intrusions and thereafter effects solitude.

3 We challenge such statements in the light of our investigations of district and state office records and photographs of these roads we have seen. They are clearly trails and ways. These are for the most part paths that actually help the casual hiker enjoy the wilderness threshold. This is truly one of the most rugged areas of wild lands in the State. It is an exceptional area; and we recommend protection of 57,660 acres.

The Park Range: We have known this area from explorations dating back to 1960. This range was one of the first de facto roadless wilderness areas to be noted in our Nevada Outdoor Recreation Resources Index and Survey.

While there are no towering peaks, it is one of the most pristine massif-type mountain areas -- massif, m-a-s-s-i-f -- in the state. It has a great resemblance to the Black Hills of South Dakota. It is known to us for its pristine hidden glens, beautiful sedimentary rock formations, untouched meadows, and colorful bluffs and cliffs. It has high value for wilderness screening, because it is well forested.

4 Therefore, we urge 46,831 acres for wilderness protection.

5 Riordan's Well: This organization urges 45,791 acres as suitable for protection as wilderness. These mountainous ridges, which extend up to 9,352 feet, is in an area rich in geological displays; faulting, complex thrusts, and vulcanism.

Its higher slopes are covered with virgin ponderosa and there are cliffs, bluffs and ridges known to contain important predatory bird raptors. It is an important winter deer habitat, and we have received reports of elk in the WSA.

There is a cave system in the area, which has yet to be explored and mapped by professional spelunkers. Too many of these virgin caves are being lost, even before the most rudimentary examinations can be made of them.

We simply are not convinced by reading the BLM's technical report, that they truly understand what a treasure-trove this series of connected Grant Range ridges is. Surely, enough is known concerning its wilderness character to upgrade the BLM's preferred alternative.

I have some closing remarks. The bibliography of the reports that have been issued by the BLM, not the Ely District but others. In closing we must point out a glaring omission in all the BLM reports we have seen, including Egan, that have come out in Las Vegas and other areas as well.

6 Since 1959, we have repeatedly brought the NORA Index and Survey -- this is a giant book, 25 pounds, that contains photographs, maps, and narratives -- and periodically we visit every district in the State of Nevada, including resource area offices. Much information that was in BLM files that was used to consider these WSA's came as a result of the NORA Index and Survey being fed into the BLM planning system as early as 1956.

The NORA Index and Survey is a large inventory, consisting of mainly maps, short narratives, and extensive color photographs of BLM wild lands which dates back to 1958.

6

It is extremely comprehensive. Even the Public Land Law Review Commission and the National Park Service in 1966 and 1969 have noted in their reports to Congress that this inventory was the first and original BLM public lands environmental project in the nation.

We trust, therefore, that the record will be corrected in regard to putting the references of the NORA Index and Survey into them. Thank you very much.

Response Number 1

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts. The native trout streams and Goshute Cave are contained within the Proposed Action.

Response Number 2

Your support for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, bristlecone pine, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

Response Number 3

In several cases, primitive roads and ways have provided partial reasons for nonsemitable recommendations. Oftentimes this is so not only because of the unnatural appearance of the travel routes, which is in some cases admittedly slight; but also because of the impracticality of ever closing such routes to vehicles, because of the impacts such vehicles would have on a wilderness area, and because of the cumulative effect of such routes when several occur in a relatively small area. All such instances were given careful consideration by personnel who had good on-the-ground knowledge of the areas.

Response Number 4

Your support for the Preferred Alternative for the Park Range, in the draft document has been noted.

Response Number 5

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine are still contained in the Proposed Action.

Response Number 6

The efforts of NORA (and many other groups and individuals) to provide relevant information about the Egan WSA's are greatly acknowledged by the Ely District. Comments received from NORA have been considered - and are on file with - all other public comments received during the inventory and study of lands for wilderness designation.

TESTIMONY 5

MR. SCHOLL: Good evening. I am Roger Scholl from Reno, the wilderness committee chairman for the Toiyabe Chapter of the Sierra Club.

The Toiyabe Chapter appreciates this opportunity to comment on the Draft EIS/Resource Management Plan for the Egan Resource Area. My comments represent the Chapter's suggestions only on the wilderness resources under consideration.

BLM is to be commended for recommending in its preferred alternative portions of three of the resource areas four WSA's, wilderness study areas, as suitable for wilderness preservation.

Each would make an outstanding addition to the wilderness system. However, we urge that BLM in its final decision adopt a modified version of the wilderness emphasis alternative, which includes a portion of the South Egan Range WSA.

The massive limestone cliffs, fir, and bristlecone pine forests, caves and excellent wildlife habitat make this a spectacular wilderness.

The wilderness emphasis alternative boundary has almost all of the high wilderness values, yet excludes most resource conflicts except possibly some range developments and vehicle routes in the center of the area.

But, livestock grazing and some range improvements are allowed. So BLM should strongly consider recommending even this part of the area.

We are especially gratified to see part of the Goshute Canyon WSA recommended by the BLM. We have followed this area carefully from the inventory stage and the wilderness review process. I believe it contains some of the

TESTIMONY 5

highest wilderness values that the BLM manages in Nevada.

With the extensive forests, including bristlecone pines, peaks of 10,500 feet, rare spotted bats, Utah Cutthroat trout, the area is truly outstanding. We urge the BLM to extend its recommendation to include all of the land in the preferred alternative plus the south end down to at least the area that existing information indicates has high mineral potential.

While there are indications that much of the south end of the area has moderate potential, this is not the stage of the process for BLM to exclude it on that basis. Only areas recommended suitable now will have the benefit of the USGS mineral survey which will better define potential for mineral development.

When an area has such a high wilderness value as the Goshute Canyon, boundary decisions should be made later in the development of administration recommendations with the benefit of added information on possible mineral potential.

It is, after all, only a sketchy idea of mineral potential that we have at this stage. In fact, there are not even any mining claims in most of the area rated as moderate potential. Yet we know the wilderness values are truly outstanding.

The BLM's recommendation for the Park Range in the preferred alternative is excellent. This remote rugged area has virtually no resource conflicts, but has wilderness values that are essentially untouched by man including rare, pristine meadows. We heartily support it.

The BLM's preferred alternative recommendation for the Riordan's Wells WSA is also good, but would be improved by

## TESTIMONY 5

5

expansion to include the wilderness emphasis alternative boundaries plus adding about 4,000 acres of rugged land on the west.

This recommendation would fill an important wilderness corridor between the Grant Range, national forest recommended wilderness, to the south and the BLM's wilderness recommended to the north.

In conclusion, we urge that the BLM recommend portions of all four WSA's as outlined above. We feel four to five percent of this vast 3.8 million acre resource area is wilderness, preserving that much is wilderness, while leaving some 95 percent available for all other uses. Including mineral development, will in no way cripple the mining industry or other uses of public lands.

In fact, we contend that recommending some five percent of the resource area as wilderness and four widely scattered areas will only provide some semblance of a reasonable balance for protecting the remaining wilderness values in the Egan Resource Area while providing for other uses, other multiple uses of the lands. Thank you, again, for this opportunity to present our comments.

## RESPONSE TO TESTIMONY 5

### Response Number 1

Your support for the 57,660 acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

### Response Number 2

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts.

### Response Number 3

In case of the Goshute Canyon WSA, the body of information concerning mineral potential is extensive and well-researched. Where such information is mostly cursory for other areas, it is believed adequate in this case to make major boundary adjustments.

### Response Number 4

Your support for the Preferred Alternative for the Park Range, in the draft document has been noted.

### Response Number 5

Your preference for an expanded, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

MR. ADAMS: My name is Rudy Adams. I am from Reno, Nevada. I am a member of the Gold Prospectors Association, which has approximately 100,000 members in the nation and about 3,000 of those in Nevada, and the local Comstock Chapter has approximately 300 members.

1 I would like to address the issue of the wilderness areas. I think they are a little bit ill conceived, as the previous speaker implied better than I could possibly say it, but the bottom line comes down to stop picking on Nevada. There is nothing wrong with having wilderness areas in some part of the country, but it seems like we are getting too much of our share being proposed here.

We presently have access to this land for not only recreational, prospecting, but for the more serious mining interest. But with the wilderness concepts slowly creeping along, we are slowly being denied access to this land or would be denied access to this land.

2 So therefore, I am not in favor of that in any way. So we should maybe consider some more of the eastern states that have some areas and, of course, the gross discrimination against the handicapped and the senior citizens, of course, is a very serious issue to address, because as the wilderness concept simply means unless you are very hale or a very strong-type person or hiker and that sort of thing, you are not going to be able to enjoy it.

Then, of course, I would also like to comment on the fact, knowing the nature of the government, that we really have no guarantees that in the future even the wilderness areas would be protected. So, therefore, I am not in favor of wilderness areas in this area in the State of Nevada in the

concept that is presently being considered, of which is too much land, as the previous speaker spoke of, and as Mr. Clark addressed earlier in the evening, that some of these areas that are -- could be put aside as possibly state parks that do not have any mineral potential, are not readily available or the type of property that would be available to the handicapped and the senior citizens.

3 In fact, if we use the criteria of the present wilderness system, Yosemite National Park would be a wilderness area. And, of course, we would all be missing a very valuable treasure there if we would not be able to see it. That is the whole concept, the American people of our land should have access to it and be able to see it and not limit it just only to the hale and the hearty.

4 So with our small Nevada population and, of course, the few visitors that we have, I do not think it would be used very much anyway, and I think that there is a possibility that they could be more useful, as our Director of Minerals pointed out earlier, that this is a mining state and it is moving along, and we in the prospecting organization are out there looking for things that we hope someday will benefit our State from an economical standpoint and, of course, improve our quality of life. Thank you.



## RESPONSE TO TESTIMONY 6

### Response Number 1

The proposed actions recommend that 106,216 acres, or 2.8 percent of the Resource Area be designated as wilderness. This leaves 97.2 percent of the Resource Area unaffected by wilderness designation. This is not considered to be an extensive recommendation. The economic and social impacts which would result from the recommendation have been thoroughly considered.

### Response Number 2

All existing access would remain open in the areas recommended suitable in the Egan Resource Area. The aged and infirm would not be denied the ability to travel anywhere that they are now able to visit.

Several commentators of advanced years have presented an opposing view, stating that they continue to enjoy large unroaded areas in spite of their senior status. Handicapped persons have often experienced the exhilaration of overcoming the challenge of the wild.

### Response Number 3

The United States Congress has recognized a need for National Parks and designated wilderness in a long history of enabling legislation. In fact, portions of the backcountry of Yosemite National Park are designated wilderness.

### Response Number 4

It is predicted that wilderness areas in the Egan Resource Area would receive only light recreation use for several years to come. Recreation use, however, is only one of six public purposes for which Congress established the National Wilderness Preservation System. The others are scenic, scientific, educational, conservation, and historical use. Also, the Congress established the system for the American people of present and future generations. Use in these areas may not be high during this or even the next generation, but at some time in the future may become substantial. Because of the nature of the resource, however, allocations must be made now.

## TESTIMONY 7

MR. ARHOLD: I am Ray Arnold and my address is in Reno. I have lived here some 13 years, but I have been an inhabitant of Nevada for some 30 years.

I know it well and I have explored the Black Rock Desert. I have explored in the Ely area. And I was free to go anywhere anytime that I wanted to. I could walk with a stick in my hand and I could knock off a rock and look at it, inspect it, and proceed.

There are thousands of people in this small State, a small populated State, that are prospectors. They are interested in more in the welfare of the State than they are of themselves.

Let me tell you, not all of us have the luxury of time and of the money to put on a backpack and walk out into the area. There is nobody preventing them from doing that, regardless of what happens at the final decision of this great Congress who will have the final approval.

May I say that there are thousands of prospectors that ride out into the hills with a pick in their hands. They are hardly able to move around, hardly able to get up in the morning, but the pleasure they get of going out there and seeing the beauty of this country, irregardless of the two or three or four, half a dozen mining ventures that have been created in this State; such as in Ely, such as in Yerington -- is that where the big copper mine is? All right. Those have not deteriorated the area or the areas for the hikers. They still hike. They go anywhere they want to, and I have yet to see a mining venture destroy a view or destroy very many plants except where they are actually operating and putting in roads.

But let me say, I heartily favor our speakers, the statements made by Paul Iverson and Bob Williams (sic). And I hope a lot of other people here can support this.



## RESPONSE TO TESTIMONY 7

### Response Number 1

The BLM's Wilderness Management Plan states that: "Recreational or hobby collection of mineral specimens (rockhounding) will be allowed in wilderness. Such use will be limited to hand methods or detection equipment that does not cause surface disturbance, such as a metal detector, or Geiger counter." (111.A.5.)

### Response Number 2

All existing access would remain open in the areas recommended in the proposed actions for the Egan Resource Area. The aged and infirm would not be denied the ability to travel anywhere that they are now able to visit.

## TESTIMONY 8

MS. BROWNSON: My name is Elizabeth Brownson. I am a resident here in Reno, Nevada. I also want to commend the BLM for their report and their study, but I hope that they will also extend their recommendations to include the conservationist areas in the decision, all four of the lands.

I really think it is important that we don't look at just today and now, but consider the whole history to come still, that these lands are valuable to maintain.

As Mr. Warren states, we are not creating the wilderness. It is there and we need to save it, I think.

I am not against progress. I have lived a good part of my life in major cities and enjoyed it, but I think the most valuable experiences you have is when you go in the wilderness areas and experience that. I mean, it just -- I can't believe you are talking about this map. It is just a little area of the whole State, a small percent, and you are talking even about a smaller fraction of the percent in these areas that are colored in.

There might be some mining there, although in the Park Range there is really not any.

I think the value that you are going to gain by saving and preserving those areas is going to be far outweighed. And I don't -- there is still a great deal of land in the State still to mine, and I think it is important that we save it, and that the areas we do want to preserve are rich with wildlife and all sorts of resources that we want to preserve.

RESPONSE TO TESTIMONY 8

Response Number 1

Your support for the Conservationist's Alternative for the Goshute Canyon, South Egan Range, Park Range, and the Riordan's Well WSA's has been noted.

63  
13  
62

TESTIMONY 9

MR. BUCHANAN: My name is Glenn Buchanan from Reno and everywhere else. I have done a lot of prospecting and a lot of mining, but the actual principle behind the whole thing with the Bureau of Land Management and mining is a subject by itself.

1 The country needs the minerals and the forests and the terrain. In other words, different formations to draw the eye, but we have to stop to remember that the minerals is what we live with. And if you cut the minerals out, you have cut everything out.

The other amendments put up by the BLM in the past, deregulated and didn't permit inference. You who are speaking in favor of this maybe sorry later, because you may not be able to get into that land as easy as you think.

That is about my comment. Thank you.

RESPONSE TO TESTIMONY 9

Response Number 1

Thank you for your comment.

TESTIMONY 10

MR. CLARK: My name is Gary Clark. I live in Sparks, Nevada. I am with the GPAA, the Gold Prospectors Association of America.

I support wholeheartedly the State's position on mineral identification and resource management of those minerals in this State. I have spent a great many summers in the Egan District. There are some very pristine areas; however, the amount of land required certainly is grossly overestimated. The entire state would be served by those areas being put into a State Park system. Thank you.

RESPONSE TO TESTIMONY 10

Response Number 1

The proposed actions recommend that 106,216 acres, or 2.8 percent of the Resource Area be designated as wilderness. This leaves 97.2 percent of the Resource Area unaffected by wilderness designation. This is not considered to be an excessive recommendation.

TESTIMONY 11

MR. DWYER: My name is Larry Dwyer. I live in Reno, Nevada. I am here representing myself as well as many friends of mine who enjoy hiking, backpacking, fishing and hunting in Nevada's many de facto wilderness areas, as well as the few designated wilderness areas.

I commend the BLM for their proposal which includes the three wilderness recommendations on the map and their preferred alternative. I would also urge the BLM to extend their proposal to all four of the study areas. In particular, I would recommend adding the Goshute Canyon area, as well as including the South Egan area in the wilderness proposal.

Thank you.

RESPONSE TO TESTIMONY 11

Response Number 1

Your support for wilderness for the four areas in the Egan Resource Area has been noted.

TESTIMONY 12

MR. FORREST: My name is Jeff Conrad-Forrest. I live in Reno. I respect the BLM staff for their ability to professionally assess the Egan Resource Area. I think they appreciate the unique qualities of eastern Nevada, which are represented in the Egan and Schell Resource Areas with their proximity to the Ruby, Schell Creek, and White Pine Ranges.

I support the preferred alternative resource plan with modifications to the -- with modifications to the Riordan's Well and Goshute Canyon area to include the areas outlined in the wilderness alternative. Also, the South Egan Range should be included as a wilderness area.

The wilderness alternative for this area has eliminated most of the mineral and cherrystemed road conflicts.

In summary, the Goshute Canyon, South Egan Range, Park Range and Riordan's Well, including the modifications stated previously, are only 4.5 percent of the resource area and should be administered as wilderness.

As a postscript I would like to say that wilderness values are appreciated by more than just hikers. There are philosophical and psychological benefits which are important to many people. Thank you.

## RESPONSE TO TESTIMONY 12

### Response Number 1

Your support for the Wilderness Emphasis Alternatives from the draft EIS for the Hlordan's Well, Goshute Canyon, and the South Egan Range WSA's has been noted.

## TESTIMONY 13

MR. HENDRIX: My name is Bud Hendrix. I live at 321 Fay Avenue in Ely. I am representing the Hendrix families that own about fifty-eight unpatented claims and seven patented claims in the Egan Area.

I'm a little appalled at the lack of interest in this meeting this evening. I thought that there would be more people here to listen and make comments.

I have gone through this wilderness technical report and am fairly well pleased with it. A lot of work has gone into it.

In some areas I was a little disappointed in the lack of information and it seemed to me that the minerals part of it was kind of downgraded or maybe they didn't mean to downgrade it, but that's the way it seemed to me. They didn't put enough emphasis on the importance of minerals.

In another part of the book they went into the fact that the government isn't going to stockpile no more of this mineral or that mineral because they had plenty of it. And, then they stated that a certain percent, certain type of mineral was imported from foreign countries, just like that pipeline would always be open. And, we know this isn't right. You can have a source of foreign material today and tomorrow that material can be cut off.

All we got to do is look back at the gasoline shortage, or supposed to have been a shortage, which was no shortage at all. But the only shortage was between our two ears.





## RESPONSE TO TESTIMONY 13

### Response Number 1

The patented land was not included in the WSA. It is adjacent to the north boundary of the WSA but is located outside of the WSA. The maps in this document have been improved to make this more clear.

### Response Number 2

Your support for the Preferred Alternative for the South Egan Range has been noted.

## TESTIMONY 14

MR. HORNBECK: Thank you. My name is David Hornbeck. I am a resident of Reno. I am an attorney here in Reno. I am speaking on behalf of myself.

First of all, I would like to congratulate the Ely District for a very comprehensive and well thought out analysis of this Egan Resource Area. Basically, or in general, I would like to support the preferred alternative with some additions and generally those additions would follow along with what has already been referred to a number of times this evening as a conservations' alternative list. With additions from what would be the All Wilderness Alternative, although not all of it.

1 | With respect to the Park Range, I have no quarrel with that whatsoever. I think that is a fine decision.

2 | With respect to Riordan's Well, I feel that the addition of the area that connects to the Grant Range and the Forest Service area should be included for the reasons earlier stated. It has an ability to make a better continuity wilderness area, an area which also contains a raptor habitat.

I refer to the technical summary or technical analysis on page 103, when it points out--this is in the All Wilderness Alternative, that with respect to the mineral aspects of the area, there are nominal adverse impacts of asking that entire -- entirely wilderness area.

There are only 2,950 acres which indicate a moderate level. And this does not raise the level of a significant impact as indicated by that definition on page 95 of the draft plan.

I would point out that on page 122 of the draft plan, with respect to all of these areas there is an analysis of mineral impact for the All Wilderness Alternative. And in that listing there are no significant impacts in any of these

areas to minerals by the definition you've adopted with the exception of the Goshute Canyon Area at the south end -- I assume of where they are the high and moderate potential and, therefore, enough area over the 5,000 acres to constitute what you would define as a significant adverse impact there. I will get to that in a moment.

3 | But with respect to the Riordan's Well, I think that the advantages certainly outweigh the disadvantages including all of that area.

4 | With respect to Goshute Canyon, in the technical report on page 85 it points out -- or it mentions that the BLM does not really know what the mineral potentials are there.

5 | It also points out that ore bodies are estimated to be too small to be of interest to large modern corporations. Coupling those two facts, I think that the prudent thing to do is to go ahead and recommend a greater area except for those definite and existing claims that are, in fact, in operation at the very south end.

I notice in -- I can't turn to the map at this instance, but I was noticing one of your maps that indicate essentially all of the claims are post FLPPA with the exception of the very few in the very southern part. So I think there would be no great difficulty in following a procedure that way, designate a far greater part of the area excluding only those parts at the very southern end where there is actual activity.

6 | And then let the USGS make its survey, and then perhaps you will have a better idea and better picture of what is there rather than just making assumptions.

I know Bob Warren is critical of some of the --

I think it is the GEN report -- and perhaps well he should be. And, therefore, since that is the data you are going on, I suggest that that -- I agree with you in that if this isn't good data, we should wait until we have good data before we make these management decisions.

With respect to the South Egan Range, you obviously have excluded all of it with which I disagree. Particularly in -- let me refer to the page. Well, that is a portion around page 121 referring to the wilderness aspects of the South Egan Range. I guess this is the section on Alternative B, which covers the All Wilderness Emphasis Alternative.

7 | Under the manageability, which appears to be the only real problem that you have with the South Egan Range, I point out that it is only a thousand acres of this area that is involved with possible mining activity. There is the one possible inholder with potential for building a road. And I would suggest that it may be premature to assume that such a road be built, because quite possibly when those areas are designated there are other alternatives.

For example, to use land transfers or outright purchase the land from the inholder to consolidate the area.

8 | The other point is that it would be difficult to manage off-road vehicle access. I submit that this area is far too valuable an area as a wilderness area to allow these potentials or problems and supposed management problems, which are not perhaps realized at this point from stopping at this stage from designating it and then dealing with the realities of what may happen later.

In the technical report, I would point out that

there are a number of positive aspects to designating this area as wilderness that you list. For example, the existing access development that I refer to, the 40 acre parcel, you state that there would be a loss of naturalness and opportunity for solitude which will result immediately adjacent to road access, but this will not affect the area as a whole. And that the non-conforming developments on many of the adjacent parcels of private land are possible but not likely.

I submit that it is not likely that this would occur either with reference to the fact that there are beneficial impacts occurring both long- and short-term for the area as a result of wilderness designation, and that is your conclusion.

As far as the minerals go, you point out that the ore deposits are too small to be of interest to the large mining companies, and that is also listed as not a significant area, as I mentioned before. There is no significant mineral impacts or energy impacts in any of the areas except Goshute Canyon.

As far as range goes, these would be minor impacts. As far as wildlife, this is a positive beneficial aspect for wilderness designation.

You also list the adverse impacts on forestry which involves, apparently, local cutting of Christmas trees. I think there can be alternatives to that.

The really, the White Pine Power Project, I wasn't under the impression that this was right on this. There is no direct interference, as I understand it, between the area and the White Pine Power Project. And there are alternatives available to the routing and so forth for the access.

There is the one Desert Land Entry that you refer to, and also a mention of possible coal delivery systems and the like. In my opinion, the values of the South Egans far outweigh these supposed and tentative problems that may or may not develop. Therefore, I would recommend that it be included as a recommended area for more intensive and further evaluation.

In summary, I have to agree that I think 4.5 percent of a 3.8 million acre resource area is a very small area indeed. And I would point out that the winnowing process has been going on for a long time. I always find it somewhat incongruous that when one speaks in favor of wilderness, one has to come from the standpoint of proving that this is a superior use of the land than some other; whereas if we apply the same requirement, let's say to mining, that say this entire area of the resource area is going to be considered wilderness unless you can prove that there is a better use and prove that there is a mineral use there that exists.

In fact, I think that would put the shoe on the other foot and we would have far larger areas designated wilderness. After all, the wilderness is compatible with almost all of the multiple uses that the Congress has designated for the management of our public lands, whereas mining is essentially a totally exclusive use.

There isn't much grazing in a mine; there isn't much watershed in a mine; there isn't much wildlife habitat, riparian areas, or anything of this sort in a mine, for example. So I think that the public interest is best served by a use of the land that is truly in multiple use.

Karen's comments about her children and spending your savings versus putting it in a trust reminded me of another

point. That is that from a conservative standpoint, I feel that our national interests are much better served by placing some of these mineral resources in trust for future generations as well as wilderness. Wilderness can always be used to get to the mineral resources.

Once we have exhausted these non-renewable resources, we are then, perhaps, in a much greater position of being dependent upon others, whereas -- in the world -- whereas if we save these natural resources and approach a policy of stockpiling sources from outside this country, I think we would be much better served in the long run, because then we would have not only wilderness in trust for future generations, but minerals as well.

And if, in fact, those minerals were there and if in fact there is some time when those minerals become crucial to us, then we can always get them, if in fact we can find them.

THE HEARING OFFICER: Mr. Hornbeck --

MR. HORNBECK: Thank you. That concludes my remarks. Thank you.

Response Number 1

Your support for the Preferred Alternative in the draft EIS for the Park Range has been noted.

Response Number 2

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

Response Number 3

While mineral resource potentials played some small role in the configuration of the Riordan's Well suitable area, a more important factor was the unmanageable character of certain portions, including the north end and the east bench.

Response Number 4

The mention on page 85 of the Technical Report refers to actual ore bodies, not potential. The extent of ore bodies is not known, but potential for substantial deposition is believed high.

Response Number 5

While large companies may be uninterested in the area, smaller scale operations may profitably extract minerals from the area. Such operations can be very important to the local economy since small and medium-sized operations are more likely to have substantial involvement from local firms than are large operations.

Response Number 6

In case of the Goshute Canyon WSA, the body of information concerning mineral potential is extensive and well-researched. Where such information is mainly cursory for other areas, it is believed adequate in this case to make major boundary adjustments.

Response Number 7

No single factor is responsible for the unsuitable recommendation for the South Egan Range WSA. Rather, it is the combination of factors enumerated in this document and the Technical Report that is the cause. Any one of these factors might successfully be mitigated, but the combination of them presents an insurmountable problem.

Response Number 8

The ORV manageability issue stemmed from the BLM's manageability criteria in the study policy. This criteria was applied in formulating the alternatives. Carrying it into the body of the EIS caused confusion as it did not really belong in an environmental analysis document. Reference to manageability has been deleted. The Affected Environment and the Environmental Consequence chapters have been rewritten to more accurately reflect reasonable ORV use in the long term. We have attempted to incorporate your concerns in this revision.

Response Number 9

The conflict with the White Pine Power Project involved the routing of a coal transportation railroad to the power plant from a point south of the WSA. This route was not selected in the Preferred Alternative of the WPPP EIS.

Response Number 10

Your support for the South Egan Range as wilderness is noted.

TESTIMONY 15

1 MS. KEEBEY: My name is Hina Keebey. I am  
Treasurer of the Great Basin Group of the Sierra Club. I don't  
like -- I don't hunt, I don't fish or prospect or mine or  
ranch, but my concern is mainly that with the -- all of the  
raping that has been done to the environment and the land and  
on the east where you have so few areas left that are  
populated, I think we should reserve as much land as we can now  
for the future generations to come. Thank you.

RESPONSE TO TESTIMONY 15

Response Number 1

Thank you for your comments.

## TESTIMONY 16

MR. LORSUNG: My name is Gordon Lorsung. I am from Reno and I represent me.

I have sat here tonight and listened to a lot of talk about preserving the land and about mining it. And I haven't heard anything about what I like to do, which is drive.

I am a little crippled up. I don't walk well. I like to see these pretty sights around the country. And if you take the roads away from me, I don't get out there and I don't like that.

I think I have got pretty much as much right as anyone else to see them. That is about all I have to say.

## RESPONSE TO TESTIMONY 16

### Response Number 1

All existing access would remain open in the areas recommended suitable in the Egan Resource Area. The aged and infirm would not be denied the ability to travel anywhere that they are now able to visit.

Several commentators of advanced years have presented an opposing view, stating that they continue to enjoy large unroaded areas in spite of their senior status. Handicapped persons have often experienced the exhilaration of overcoming the challenge of the wild.

TESTIMONY 17

MS. MAZZA: My name is Amy Mazza. I live in Reno, Nevada.

I think the BLM has done an excellent job in studying the Wilderness Study Areas in the Egan Resource Area. I support the wilderness recommendation for all four: The Goshute Canyon, the Park Range, the South Egan Range, and the Riordan's Well.

The wilderness resource of the Park Range has long been recognized by the BLM. I remember before FLPMA was passed, it was high on the list, high on a list of primitive areas proposed in the State Office. I totally support the BLM's proposal for the Park Range.

I have hiked in the Grant Range both to the north and to the south of Riordan's Well and experienced an awesome beauty there. I support expansion of the WSA on the southwest. It makes much more sense to me to protect the known resource now and to allow the USGS to study this mountainous portion to see if a sufficient economically productive mineral really does exist there.

I believe this is also true of a couple thousand acres in the southern portion of the Goshute WSA. The South Egan Range is, as Charlie Watson pointed out, possesses pristine wilderness and natural features. It should be recommended for wilderness by the BLM. These four areas are in effect wilderness now and it is not injuring our local economy.

Further, even though I am not a hunter, I think that some hunters also need areas not roaded up. In addition, not all Nevada ranchers are against wilderness and it has a positive value of protecting their grazing lands from some of the troubles that vehicular access can bring.

TESTIMONY 17

If there is, as Bob Warren said, a so-called business bias against mining in this document, I think it is because it is such a change. For the first time this process is the first time that in the history of the west that BLM is giving wilderness a fair shake. It is really looking at the wilderness value and what is the wilderness value.

And I think that is a hard change, because for so long the west has not been interested in preserving itself. It has been destroying itself.

But I believe wilderness is just as important as mining. As Aldo Leopold said, something like, "What good are 40 freedoms without a blank spot on the map?" What good is the standard of living and material things that mining gives us if we destroy the beauty of spectacular places like these four WSA's?

In this materially dominated world, I think we need beauty.. I think we need a passion for beauty if we are going to -- if our race is going to exist in the future. Thank you.



## RESPONSE TO TESTIMONY 17

### Response Number 1

Your support for wilderness designation for the four WSA's in the Egan Resource Area has been noted.

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## TESTIMONY 18

MR. MILLER: My name is Glenn Miller. I live at 1850 Pryor Road in Reno. I would like to speak generally for wilderness and in the preferred alternative in some cases and the wilderness emphasis in some other cases.

First of all, I would like to make a couple comments generally about the wilderness process. As I am sure you are well aware of, the wilderness progress has been going on for quite some time now. And in that progress, lands have been gone through various processes of wilderness study. And the lands that have been excluded up to now, in some cases are areas that we felt -- conservationists felt that should have been retained.

A couple of those areas are an area in the Egan Range, which is Martin Spring, and also the north part of the Goshute Canyon Range to the north of the large road cut.

These areas are very high and very spectacular and have wilderness qualities that we feel should have been retained. The point is that a lot of land in the Egan Resource Area has already been excluded into what has come down to a very, very, I think, a fine line or a very detailed consideration and exclusion of a lot of areas. So what remains are areas that do, indeed, have dramatic wilderness potential.

1 | First of all, I would like to support strongly the Park Range proposal. It has a special primitive character that exists in very few places in the lower 48 states. There is, indeed, very very few areas in the entire world at this time that are as remote and, I think, as pristine as the Park Range, from an academic perspective, which is what I have the areas --

TESTIMONY 18

the areas have offered tremendous research potential in the years to have some areas that exist today and will hopefully exist in the future as they existed a hundred, two hundred thousand years ago.

I think it is very important to have that biological and genetic research available in those kinds of areas which exist in very few other places.

2 Second, Riordan's Well, again, it has been expressed before. It is a very fine land north of the Blue Eagle recommended wilderness and also the Forest Service Grant recommended wilderness. And I feel that could be very easily extended to the west to include the wilderness emphasis alternative. There are very few conflicts in either of the first two.

In the South Egans also we would very much like to see recommended, wildlife emphasis, as you are well aware is not recommended, but the Egans is an area I have hiked in and was particularly impressed with the spectacular and high nature of Egan, which is unlike a lot of the BLM areas that have been considered around the State.

It is a pine forest. It has running water in many cases, and the wildlife resource - which is tremendous.

3 Again, the South Egans should be recommended. It is part of a chain of mountains and it extends quite a ways up. I think there should be aspects of that range protected over the long term. It would require some firm decisions, resource decisions, but certainly there is an area that could be taken -- that could be recommended with very little conflicts, particularly in the north.

And, finally, the Goshute Canyon area is an area,

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TESTIMONY 18

I think, there has been some concern about. It is an area of particularly high wilderness value. It has high classic wilderness values. Ask the general population what kind of an area would you think about wilderness and they would talk about an area such as the Goshute Canyon.

It has fishing qualities, hunting qualities that will best be retained by having a very unroaded area.

I hiked last weekend with my two girls and my wife in an area around Renu that had previously not, obviously, and will not be declared a wilderness, close to Reno, and it had -- it seemed to have roads go everywhere. There was not, I don't think, from what we could see, there was not even a quarter of a mile of open country that was not roaded. It was a very nice area, but, obviously, there was no experience of solitude or no wilderness experience in that area, although this was very pleasant to walk in.

I think a four percent recommendation of the resource area is certainly not an overestimation of the amount of area that could be recommended.

4 Lastly, in the Goshute Canyon area, I would like to see the south wilderness emphasis and an overlap of the wilderness emphasis and the recommended -- the preferred alternative be included. I even think the wilderness emphasis is not including enough land to the south. Certainly, there are some mining conflicts in the very far south. I think they can be excluded. They can be drawn around, but the rest has certainly high wilderness values.

From a mining perspective, I can understand criticism if an area like Alligator Ridge was recommended, because of the very high mineral potential in that area. It

## TESTIMONY 18

is not and clearly should not be. It has high values for the minerals industry and I don't think anyone is proposing that it is; it is what is -- the use of that land is as it should be. It is a mineral production.

But the areas that are under consideration now, none of them have high wilderness potential. There is only a small percent that even has a moderate potential. And a lot of them have really essentially no -- excuse me -- have high minerals, very, very little of it even has a moderate minerals potential, and most of it has a very, very low mineral potential.

And I think that the -- on a balancing thing, and this is what I think everybody is interested in, a four percent recommendation is not very large.

Finally, what we are balancing in most of these areas, all of those areas is a very known and well established wilderness value against a highly speculative mineral potential, and I think in this case with all the other areas that have been excluded, going with the known wilderness resources is the obvious and correct decision. Thank you.

## RESPONSE TO TESTIMONY 18

### Response Number 1

Your support for the Preferred Alternative for the Park Range in the Draft document has been noted.

### Response Number 2

Your preference for the 45,791-acre, Wilderness Emphasis Alternative from the draft document has been noted. The most important values in the Riordan's Mill WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quins Range RARE II areas.

### Response Number 3

Your support for wilderness for the South Egan Range is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

### Response Number 4

Your preference for a combination of the Preferred and Wilderness Emphasis Alternatives from the draft document is noted. The BLM determined that the four alternatives analyzed were sufficient to adequately address the environmental impacts.

MR. SMITH: My name is Ross Smith. I live in Reno and at the present time I represent myself, only.

My acquaintance with the Egan Resource Area dates from quite a while ago. During my college days at UNR in the late 40's, I worked for several summers over in the Liberty Pit at Ruth for Kennecott Copper Corporation.

After graduation, in 1950 I worked for a year as a mining engineer for a Consolidated Copper Mines Corporation, Kimberly Nevada, a company which later sold out to Kennecott and no longer exists.

At that time I did visit at least one of the areas. I visited the Go-hute Canyon area, and I may have visited the South Egan area, although I am a little bit uncertain now about exactly where I did go. It may have been a little north of there.

At the present time I am a professor of minerals processing in the Mackay School of Mines, University of Nevada, Reno. Now, at the same time I am an environmentalist and a member of a number of environmental organizations. And since 1940, I have been a backpacker and have backpacked over most of the western United States and have seen all types and manners of wilderness areas, de facto areas, and so on.

As I stated before, I represent myself, only. When I think about this, of course, I do experience some conflicts when I think of my mining position and background and of my love and respect for the wild places of the United States.

Of course, when I take a stand on something like this, I must decide on how I will act as a true professional, based on the greatest good for the most people over the longest

period of time, as I see it.

Actually, however, in the case of the Egan area, the choice is easy, as it is in many other areas, considering the amount of designated wilderness that does exist in the U.S. at the present time. I think that at least the wilderness emphasis and preferably the All Wilderness Alternative should be recommended. I will attempt to explain why.

There are, according to the BLM, approximately 3.8 million acres of public land on the resource area. The four areas being looked at are already, you know, a compromise of a compromise. And if we reduce the area of any of them further, we have another compromise. We are being compromised to death here. And every compromise really is a loss. Even the All Wilderness Alternative would involve only about 6.2 percent of the public lands in the Egan Resource Area; really a rather trivial amount. The wilderness emphasis is only about four and a half percent.

Now, I ask you, is that all that is left of our Nevada wild heritage? I mean, is that all we can come up with out there?

Further, you know, we have had people talk about, oh, the people who live out in White Pine County. I know some of those people. I also know many who have left the area. I mean, I still know a few, but most of them have left by now or have died, or various things have happened to them.

I cannot believe that all the people in White Pine County want every last square mile, every last square inch, I should say, of the Egan area roaded.

You know, many of the people out there really like the land, the land out in White Pine County. They are, of

There is, of course, Crested Butte in Colorado which has not been developed; a large deposit on the Colville Indian Reservation in Washington, and so on.

That is what I am trying to say. Is that we have so much moly that we really don't know what to do with it. Copper, there is a fair amount of copper, low grade, in Nevada.

You know, I have not commented about this too much, but I would like to take one small pot shot at a statement in the Egan wilderness technical report. At one point it says something about other companies supplying copper in the world market at an artificially low price. Come on now, does this mean that they are artificially upgrading the grade of their ores? But that actually has very little to do with my discussion here.

At any rate, what I am trying to say is that one could not expect a significant copper from the State of Nevada in the near future. There is a substantial amount of barite present and magnesite, some magnesite, one big magnesite operation, some gypsum. I am not certain whether there is a fluoride operation or not.

Some mercury, however mercury is a poor bet as long as Almaden, Spain exists, where the problem there is to keep from poisoning all of the workers from the mercury that oozes out of the rocks.

At any rate, what I am trying to say is that on that four and a half to six percent, chances of really finding something viable--or we could have some people out there tearing up the land, a single man with a bulldozer can do a lot of damage. We are not talking about anything really significant, in my opinion.

Also, keep in mind, someone mentioned something about exploration geologists. Keep in mind that they are not disinterested observers, that their job depends on going out and looking. So, of course, they are going to say we have wonders here. Otherwise, you know, there is not much mining, really, in Nevada.

There is probably some things I have forgotten about.

Geothermal, you know, the geothermal deposits that are going to be developed are only those -- at least for the power generations -- are only those that are very large and have a very high temperature. They are not likely to be present on those little areas that we are talking about. That is that it is simply not going to be possible to run them, if one considers the laws of thermodynamics and so on, unless they are very, very large.

Now, it is true there are some operations around the State where lower amounts, smaller amounts of geothermal energy can be used for agricultural use and so on. But this can only take place very close to a railroad or a major highway. It will not take place in some of these more remote corners of the State.

My gosh, we can't even develop Steamboat Springs near Reno, right here, let alone some of this other stuff.

THE HEARING OFFICER: Can you conclude?

MR. SMITH: I am just about to finish.

At any rate, what I fear more than loss of mining opportunities is that we will not in the long run set aside enough wilderness areas, BLM, Forest Service, National Parks and so on, not certainly for the year 2100, perhaps not even

## TESTIMONY 19

course, suspicious of the government and so maybe we all are in our own way. But I seem -- it seems to me that someday they will all recognize and realize that the only way to really protect their wild Nevada heritage is through a certain quantity of formally designated wilderness areas.

Concerning mining and geothermal development, again we are only talking about four and a half to six percent of the Egan area. And, again, I would claim that this is insignificant.

Consider, for example, Nevada has been opened to mining, prospecting and the like for a long time, for well over a century. Furthermore, among western states, the lower 48 and more of it has been available for prospecting.

Furthermore, as was noted in McPhee's recent book on the Great Basin, Nevada is aware, in his words, everything hangs out unencumbered by thick vegetation and soil. In spite of this and in spite of the fact that any number of prospectors have gone over the State time and time again. And, furthermore, yes, a few more things can be found through modern methods, but maybe not all that many.

In spite of this intensive look that has been given to Nevada by prospectors for well over a hundred years, there really is surprisingly little mining in Nevada. In 1981, according to the U.S. Bureau of Mines Mineral Yearbook, Nevada was only sixteenth in the nation in production for value of non-fuel mineral resources; thirty-third based on a square mile basis, per square mile basis.

Also, let us consider -- I mean, that is just -- there are lots more important mining states than Nevada, obviously, and this is in spite of the fact that most of it

## TESTIMONY 19

has been available for prospecting and mining and so on for well over a hundred years. Consider what is being mined now in Nevada. It is true that there is a considerable amount of gold, some silver mining in this State and, yes, Nevada is an important gold mining state. This is where the most values will be found.

There is also, of course, molybdenum mining. I guess it is not being mined right now since the Tonopah concentrator. I think it is operating, but I am not sure if there is any mining there. No molybdenum has been sold. No, that is not true. I guess some has been sold to Japan, but not much from that.

What I am trying to say, there is quite a bit of molybdenum in the State, not only in Tonopah, but Exxon has a rather large find in eastern Nevada. But my God, we have more moly than we know what to do with, and we are well into the 21st century.

Consider that Anaconda's operation in Tonopah is very much in doubt. It could only be resuscitated by a tremendous growth in our steel industry, which is unlikely to take place.

Furthermore, Moly Corp at Questa, New Mexico, has recently completed a third of a million dollar expansion and renovation program, a moly operation; the Thompson Creek operation in Idaho, development of this has continued about the present. It may stop. This is of the same order of magnitude as the Tonopah operation; the exploration at Quartz Hill. The development of Quartz Hill in Alaska is continuing. This property is of the order ten times greater than anything that we have been talking about now.

## TESTIMONY 19

for the year 2000.

And I think that we should set aside a reasonable amount here. More than we will really, much more than we are going to.

Furthermore, I do resent the whole idea, even though I am a mining man and mining has its place here on public lands, but public land should not be administered strictly for mining, and should of you would have it. Thank you.

## RESPONSE TO TESTIMONY 19

### Response Number 1

Your support for the All Wilderness Alternatives for the WSA's in the Egan Resource Area has been noted.

### Response Number 2

The statement from the Technical Report refers to the fact that some nations subsidize their copper industries with wealth drawn from other domestic industries, then export the copper at very competitive prices so as to acquire foreign exchange.



TESTIMONY 20

MS. TANNER: Well, if I can decipher these notes tonight, I might have something to say to you. My name is Karen Tanner and I live in Reno and I am speaking just for myself.

I am a school teacher, an elementary school teacher. In school the other day we were having a discussion in social studies. I teach three of the fifth grade classes social studies, because we trade four different subjects, and we were doing sort of an overview of the whole United States and talking about the different natural regions and what each of those regions had to offer.

We were talking about the natural resources of the land as a whole and, gee, why were people interested in coming there from Europe. And so we began listing what things land had to give us. I like to teach by asking questions rather than telling the children.

So we were listing them on the board and they were giving me some ideas, and we listed forests, and water and minerals and oil, and gas and coal.

Then one little girl raised her hand, and she is sort of a slow-speaking child, and she kind of is slow in a lot of ways, but she said very quietly, "Beauty."

And I said, "What?"

And she repeated it. She said, "Beauty."

I had never had this come up before and I have been teaching nine years. I thought: Well, yes, Erica, you really have a good idea there.

And then I asked the children, "Well, can the land be valuable just for itself; is beauty a value?"

And we did discuss that for a while and there

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were different opinions on that. I won't go into that right now, but it really points out how we are at sort of a turning point right now in that our historical perspective has always been one of needing to use the land for its economic benefits, and now we are just -- this whole inventory is sort of a symbol of fact beginning to change and develop a land ethic now that we are finally running out to the end of our land, that perhaps there are other values besides the economic value.

Well, all that just sort of gives you an indication that I, of course, will be speaking in favor of wilderness. And, so to speak specifically to your proposal, I would like to say that I think you did a really fine job and I like your preferred alternative, although I would make additions to that.

1 The Park Range is fantastic. That is great. I don't see any resource conflicts there. The wilderness values are high and that is just a real -- that is a shoe-in. That is great.

2 Riordan's Well, I would -- I would ask for the whole thing. I think that while down in the boot-shape unit it does have some mineral potential on that, that is speculative. And in the north, I think it is very important that this area is adjoining to the Blue Eagle Unit, which is also a WSA.

And I think that in the preferred alternative that boundary is pulled back away from the Blue Eagle Unit, and I think that it should be maintained adjoining in the hopes that perhaps we can make some kind of a significant complex some day, maybe even to the point of closing that road. I think we have a great opportunity there.

Let's see. The Goshute Canyon is a beautiful area.

TESTIMONY 20

3 | Your proposal is good, but I think what we really need is,  
 again, the whole thing.

4 | In the south it is quite scenic and it is known,  
 the whole area is known for its wilderness qualities. The  
 conflict is, again, mineral. And, again, I would say that that  
 is speculative and we really need to find out more about that  
 before we cut so much out of the Goshute Canyon Unit.

5 | And last of all, the South Egan Range. I would  
 propose that we keep a portion of the South Egan Range and  
 that we go with the wilderness emphasis alternative. It is  
 highly scenic, especially the nine mile canyon area. I know that  
 there are a lot of conflicts with this area. I know that there  
 are a lot of cherrystom roads, but I think with the  
 wilderness emphasis alternative, that where you pull back the  
 boundaries to that western bench, that you have eliminated the  
 majority of the cherrystom problem, granted there are still  
 roads penetrating the central portion, but these roads are of  
 a low quality.

I think that we -- that this area is important  
 enough that we should consider some other alternatives, whether  
 it were to break this unit up into two separate units and  
 consider them that way, or I would prefer that perhaps those  
 roads -- those portions of those roads be closed.

And, last of all, I would like to re-emphasize  
 like so many people have done, that we are really talking  
 about a very, very small portion of this entire resource area.  
 My proposal is just a little over four and a half percent.  
 That is just negligible, and if you were really to be truly  
 democratic and divide this area up amongst the different  
 multiple uses that are listed in the organic act, what are

TESTIMONY 20

there, maybe four or six different amounts? Maybe wilderness  
 should be getting 20 percent or 25 percent. So I think  
 four and a half percent is a very small percentage to ask.

Also, I think it is very important to note  
 what Roger had said, that if indeed these areas are recommended,  
 that the USGS and the Bureau of Mines are then required to do  
 an intensive study of these areas for their mineral potential.

I agree with Bob Warron that the mineral study  
 so far is highly inadequate and they do need to be able to be  
 looked at much more thoroughly. So I think it would be to  
 everyone's benefit to have these areas be recommended and then  
 have a thorough study done and then make the final decision.

Last of all, I would just like to say that --  
 conclude with a thought that we should really begin thinking of  
 not just ourselves and our particular lifetime, but our future  
 generations.

I have two teenagers and am contemplating  
 grandmotherhood not too long down the road, and I would like  
 to think my children and their children and even 200 years from  
 now, my distant relatives will be able to have some sort of  
 choice in what is to be done with our land.

We are down to the very last little bit of it  
 that we are looking at now and that is like our money in the  
 savings bank. We are faced with the choice now of whether we  
 are going to spend all our savings now or hold some of that in  
 trust.

So I would say that if we err -- I think we  
 should err on the side of wilderness, because once that land is  
 opened, it cannot be returned to a wilderness state. But if it  
 is protected as wilderness, it is not locked up. It is just  
 held in trust for a future decision. Thank you.

## RESPONSE TO TESTIMONY 20

### Response Number 1

Your support for the Preferred Alternative for the Park Range in the Draft document has been noted.

### Response Number 2

Your preference for the All Wilderness Alternative for the Hordan's Well WSA has been noted. The most important values in the Hordan's Well WSA, including the raptor habitat, scenic areas, and ponderosa pine, are still contained in the Proposed Action. This suitable portion still forms an integral component of the Grant Range complex which includes the Blue Eagle WSA and the Forest Service's Grant and Quinn Range RARE II areas.

### Response Number 3

Your support for the All Wilderness Alternative for the Goshute Canyon WSA is noted.

### Response Number 4

In case of the Goshute Canyon WSA, the body of information concerning mineral potential is extensive and well-researched. Where such information is mainly cursory for other areas, it is believed adequate in this case to make major boundary adjustments.

### Response Number 5

Your support for the 57,660-acre, Wilderness Emphasis Alternative for the South Egan Range in the draft document is noted. The BLM does recognize that the South Egan Range contains highly scenic portions, raptor habitat, and many opportunities for recreation. The area would be given special attention for possible recreational developments and would be managed in a manner to preserve these special values.

No single factor is responsible for the non-suitable recommendation for the South Egan Range WSA. Rather, it is the combination of factors enumerated in this document and the Technical Report that is the cause. Any one of these factors might successfully be mitigated, but the combination of them presents an insurmountable problem.

## TESTIMONY 21

MS. WOODIN: I'm Terry Woodin. My address is Reno, Nevada. I represent myself and a large family.

My main remarks are directed to, one, thanking you for your courage in this political climate to be willing to set aside any lands for wilderness designation. A bit of chagrin to find my tax dollars are paying for statements that essentially say, "No land can be set aside," because in order to set it aside we first have to explore to see if there are mineral resources.

And the sort of exploration that was described would, in effect, destroy any wilderness designation that was there to begin with.

1  
And to urge you to include in your wilderness areas not only those which you have already included, but those which are just recommended to you by the previous speaker, because as -- not only as a mother of a large family, as a scientist I realize the necessity for keeping some for future generations to explore areas which have not been touched or damaged, so that things that we now do not anticipate being valuable will be available to be utilized in the future. Thank you.

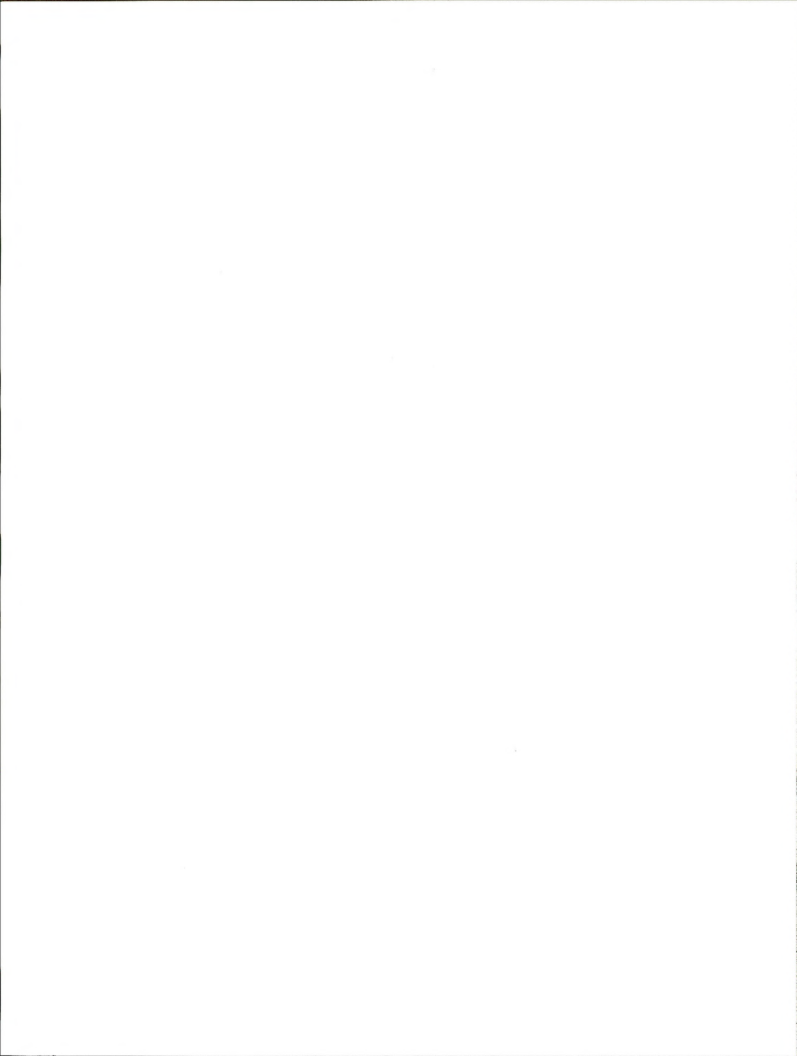
**RESPONSE TO TESTIMONY 2 1**

Response Number 1

Your support for wilderness is noted.

# GOVERNOR'S CONSISTENCY

## REVIEW



RICHARD H. RYAN  
Governor



LINDA A. RYAN  
Director

## STATE OFFICE OF COMMUNITY SERVICES

Capitol Complex  
Carson City, Nevada 89710  
(702) 885-4420

June 1, 1984

Edward F. Spang, Director  
Nevada State Office  
Bureau of Land Management  
P.O. Box 12000  
Reno, Nevada 89520

NV SAI No. 84300018

RE: Governor's Consistency Review

Dear Mr. Spang:

The State has reviewed the Proposed Egan Resource Management Plan and Final Environmental Impact Statement for consistency with the State's plans, policies and programs.

After this review, and after discussion among the various State agencies as well as with representatives of your agency, the State is reiterating the concerns expressed in the State consensus position on wilderness sent to you in January in response to your draft document.

Specifically, while we concur with your position on the Park Range Wilderness Study Area and the South Egan Range Wilderness Study Area, we remain in disagreement about the remaining two areas.

In both the Riordan's Well Wilderness Study Area and the central portion of the Goshute Canyon Wilderness Study Area, the State feels that the mineral potential is well documented. New studies released since the State developed its consensus position only reinforce this position. While we do recognize the wilderness values present in both areas, the State contends that the minerals conflicts render both areas unsuitable for wilderness designation. We would support the consideration of other methods



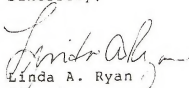
Edward F. Spang

Page -2-

of protection of the natural and scenic and recreational values of these areas. However, we urge you to drop from further wilderness consideration all of the Riordan's Well Wilderness Study Area and that portion of the Goshute Canyon Wilderness Study Area that extends south of the existing natural area along Goshute Creek.

The State appreciates the opportunity to review this document, and the willingness of your agency to discuss it with us. Please notify us of any further action on this matter.

Sincerely,



Linda A. Ryan  
Director

LAR/11

## LIST OF PREPARERS

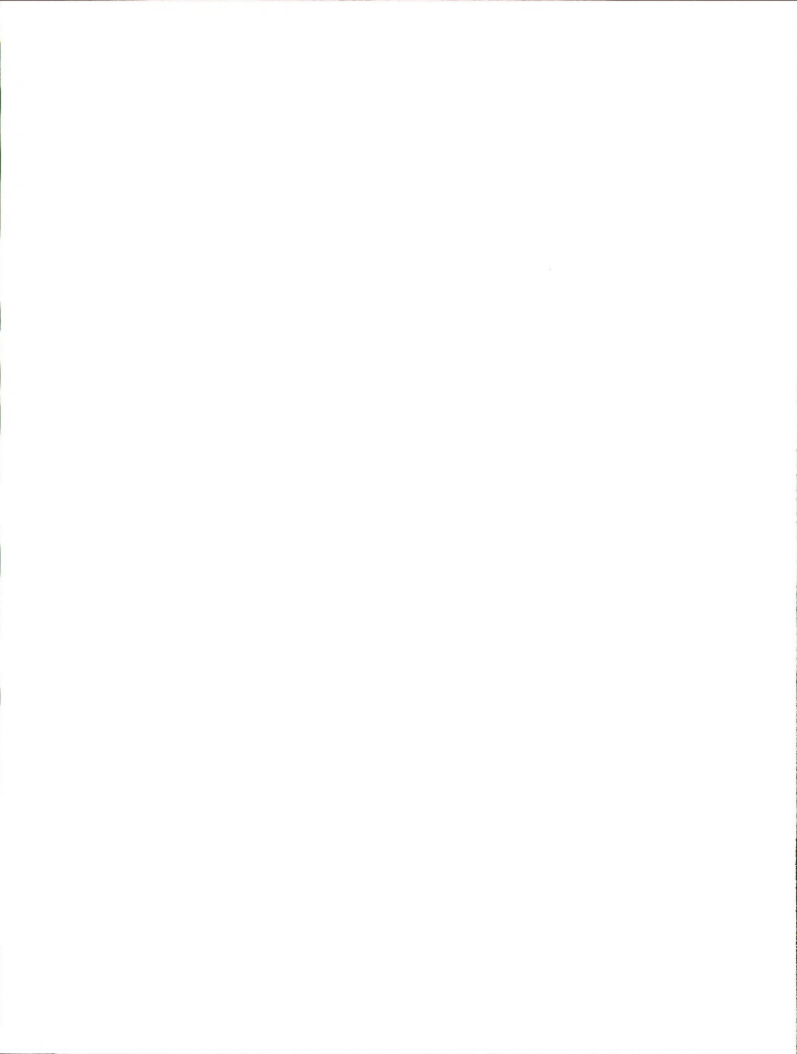


TABLE 9

## LIST OF PREPARERS

<u>Name</u>	<u>Assignment</u>	<u>Education</u>	<u>Years of Experience</u>
Brian Amme	Assistant Team Leader/Cultural Resources	B.A. Anthropology Univ. of California Santa Barbara	11
Mark Barber	T & E Animals/ Watershed	B.S. Wildlife Mgt. Oregon State University	16
Robert Brown	Wild Horses	B.S. Zoology Univ. of Arizona	11
Cris Ann Bybee	Soils	B.S. Agronomy Univ. of Nevada-Reno (1 yr. graduate-Soil Science)	8
Diane Colcord	Cartography	B.S. Art Education Univ. of Oregon	18
Lisa Diercks	Range	B.S. Biology William Woods College, MO Range Management Studies New Mexico State Univ.	8
Dana Larsen	Range	B.S. Range Science Utah State Univ.	4
Bill Lindsey	Range	B.S. Range Resources Oregon State Univ.	8
Kathy Lindsey	T & E Plants	B.S. Wildlife Mgt. Univ. of Nevada - Reno	8
Shaaron Netherton	Team Leader/ Recreation/ Wilderness	B.S. Wildlife Mgt. Humboldt State Univ.	9
Jerry O'Donnell	Word Processor	A.A. College of Southern Utah	4
Michael Perkins	Wildlife	B.S. Wildlife Science and Fisheries Science Utah State Univ.	10

Paula Peterson	Hardrock Minerals	B.S. Geology Univ. of Michigan M.S. Geology Michigan Tech. Univ.	7
Louise Power	Editor/Proofreader	B.S. Park Administration Texas Tech. Univ.	20
Jacob Rajala	Environmental Review/WPPP	B.A., M.A. Anthropology M.S. Forestry & Range Mgt. Washington State Univ.	10
Harry T. Rhea	Forestry	B.S. Forestry Univ. of Tennessee	13
William D. Robison	Oil and Gas	A.A. Engineering South Western College B.S. Geology San Diego State University	6
Ronald Sjogren	Lands	B.A. Geography San Diego State University	24

## REFERENCES



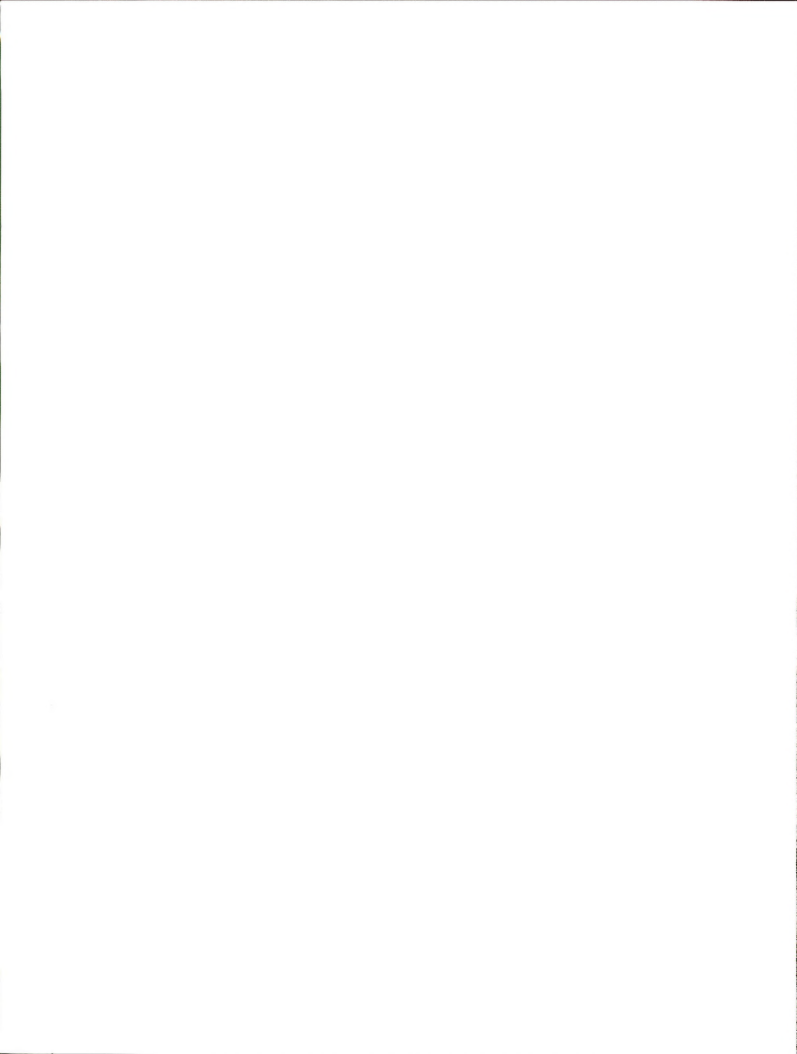


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## APPENDICIES



# APPENDIX A

## SUMMARY OF STUDY POLICY CRITERIA AND QUALITY STANDARDS

CRITERION 1 EVALUATION OF WILDERNESS VALUES: The BLM will consider the extent that each of the following factors contributes to the overall wilderness value of the area.

-Mandatory Wilderness Characteristics: The quality of the WSAs wilderness characteristics (size, naturalness, and outstanding opportunities for solitude or primitive recreation).

-Special Features: The quality of the optional wilderness characteristics (ecological, geological or other features of scientific, educational, scenic, or historical value).

-Multiple Resource Benefits: The benefits to other resource values which only wilderness designation of the area could ensure.

-Diversity in the National Wilderness Preservation System (NWPS): How wilderness designation of the area would contribute to expanding the diversity of the NWPS. To be addressed are: ecosystems and land forms, areas within a day's driving time, and balancing the geographic distribution of wilderness areas.

CRITERION 2 MANAGEABILITY: The area must be capable of being effectively managed to preserve its wilderness character.

QUALITY STANDARDS: These six standards will be applied to each WSA and the information gathered will be analyzed and documented in the wilderness environmental impact statement and wilderness study reports.

ENERGY AND MINERAL RESOURCE VALUES: Each WSA's identified or potential energy and mineral resource values will be assessed before making a suitability recommendation. All areas recommended as suitable for wilderness preservation will have a U.S. Geological Survey/Bureau of Mines mineral survey completed before Congress reviews the final recommendations.

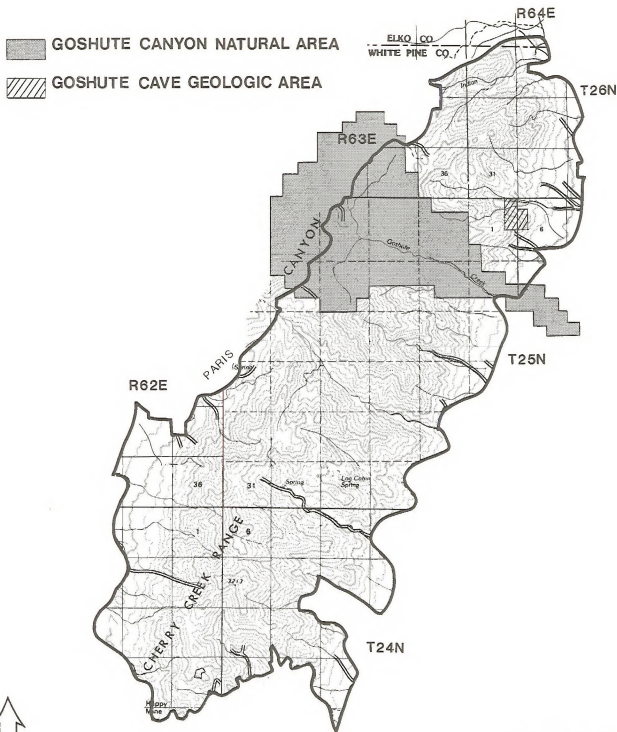
IMPACTS ON OTHER RESOURCES: The resource values or uses of the WSA which would be foregone or adversely affected by wilderness designation will be considered.

IMPACTS OF NONDESIGNATION ON WILDERNESS VALUES: If an area were not designated as wilderness, those values which would be foregone or adversely affected will be considered.

PUBLIC COMMENT: The BLM will consider all comments received from the public at all levels -- local, state, regional and national.

LOCAL SOCIAL AND ECONOMIC EFFECTS: The BLM will give special attention to local adverse or favorable economic and social effects, identified through the wilderness study process, in determining the suitability recommendations.

CONSISTENCY WITH OTHER PLANS: The BLM will consider the extent to which its suitability recommendations are consistent with approved and adopted resource-related plans of state and local governments and Indian tribes.



APPENDIX B  
 GOSHUTE CANYON  
 NV-040-015

WILDERNESS REPORT

Goshute Canyon

Natural Area

Bureau of Land Management  
Department of the Interior

February 28, 1980



Goshute Canyon Natural Area

Assessment of Wilderness Characteristics:

After an intensive inventory, it has been determined that the Goshute Canyon Natural Area does not by itself possess wilderness characteristics. The basis for this determination is as follows:

Area Description and Size - This Natural Area consists of a narrow, wooded creek canyon and an upper basin containing sagebrush and other low-lying shrubs. The total size of the area is 7,650 acres; however, a road divides the Natural Area into an eastern and western portion.

Naturalness - The eastern portion of the unit (N1) contains 4,400 acres that appear to be in a substantially natural condition. The western portion is further divided into two apparently natural portions: (N2 (1,580 acres) and N3 (740 acres).

Outstanding Opportunities -

Solitude: There are no outstanding opportunities for solitude in the designated Natural Area. The sizes of the natural portions of the designated Natural Area serve to restrict opportunities for solitude. Additionally, neither the vegetative nor the topographic screening is sufficient to provide outstanding opportunities for solitude.

Primitive and Unconfined Recreation: Neither the diversity nor the quality of opportunities for primitive and unconfined recreation is outstanding in the designated Natural Area.

Supplemental Values - Scenic, archaeological, and scientific values (the presence of an endangered fish) is present in the unit.

Because this area does not meet either the naturalness or solitude or primitive recreation criterion set by the Wilderness Act for wilderness qualification, this Natural Area does not by itself qualify for wilderness designation.

Description of Status of Contiguous Roadless Lands:

The lands contiguous to the designated Natural Area make up, along with the Natural Area, wilderness review area NV-040-015, 195,100 acres of which are currently in the intensive inventory phase of the wilderness review process. Much of this area is highly intruded with undocumented routes and imprints of man's work associated with ranching and mining activities. A 28,600 acre portion of the unit, NV-040-015A, was dropped from further wilderness consideration during the initial inventory. It is, however, part of the roadless land contiguous to the Natural Area. The total area of the contiguous roadless lands is 223,700 acres. About 6,700 of these acres are privately owned, with the rest under management by the Bureau of Land Management. At this time, the Natural Area and its contiguous lands that are being inventoried remain under the interim management protection provided for all lands under wilderness review.

Documentation of the Reason for Deferral of the Recommendation on Wilderness Suitability:

A special, separate intensive inventory was conducted on the designated Natural Area, and the conclusion drawn by this inventory was that the Natural Area does not qualify by itself for wilderness. There is a possibility, however, that the Natural Area might possess wilderness characteristics when considered together with its contiguous roadless lands. These contiguous roadless lands are currently under intensive wilderness inventory. Until this inventory is complete, a recommendation on the Goshute Canyon Natural Area will be deferred.

Schedule for Completion Date of the Study on Contiguous Lands:

The schedule for completion of the intensive inventory of the contiguous lands is the same as for all intensive inventory units in Nevada. Final State Director decisions will be made on September 30, 1980. If the unit is found to qualify for wilderness study, a suitability recommendation on the Goshute Canyon Natural Area and its contiguous roadless lands will be made following the completion of the Resource Management Plan for the Egan Resource Area, scheduled for June 30, 1985. An environmental impact statement is also scheduled for completion in 1985.

If the contiguous lands are found to lack wilderness characteristics, a final report will be submitted on the inventoried area by January 30, 1981. If protests or appeals are registered on the September 30 decision, the final report will be submitted three months after the protest or appeal is resolved.

A Geological Survey - Bureau of Mines mineral survey should be scheduled for the Natural Area and its contiguous lands in 1983.

## BACKGROUND INFORMATION

## I. Statement of Previous Designation:

Goshute Canyon was designated a Natural Area on December 22, 1970. It was thereby segregated from all forms of appropriation under the public land laws, except the Recreation and Public Purposes Act and the material sale and mineral leasing laws. It has also been segregated from appropriation under the general mining laws. The purpose of this designation is to protect the Utah Cutthroat Trout, a fish which inhabits Goshute Creek and which is on the State's endangered species list. (See Federal Register, 22 December, 1970, p. 19367).

## II. Significant Resource Data:

- A. The Utah Cutthroat Trout, listed by the State of Nevada as an endangered species, inhabits Goshute Creek, located within the Goshute Canyon Natural Area.
- B. Two minor archaeological finds have been located and collected from the Natural Area.

## III. Description of the Report Area:

The Goshute Canyon Natural Area and its contiguous roadless lands are located in the central portion of the Cherry Creek Range. The Natural Area consists of a high meadow bowl and a creek canyon. Much of the contiguous roadless land south of the Natural Area consists of rugged mountains, while the contiguous roadless land to the north is composed of less rugged, more rolling mountains, plus a significant portion of valley floor and benchlands.

Vegetation in the Natural Area includes some pinyon pine, juniper, and aspen, as well as conifers, cottonwoods and willows in Goshute Canyon, but the dominant vegetative form is sagebrush. South of the Natural Area, tree cover is thicker, and in some areas, in particular in several draws, is very dense. A forest fire has recently burned a portion of the unit south of the Natural Area. The mountains north of the Natural Area support only scattered stands of pinyon, juniper and white fir, and the dominant vegetative forms are low brush forbs. The valley portions are entirely treeless.

The Goshute Canyon Natural Area is located in the Ely District's Cherry Creek Planning Unit which is over 2,000,000 acres in size. Approximately 196 persons were directly and indirectly employed in the recreation industry in the Planning Unit around 1972, but only about 21 of these persons were dependent on recreation activities in Natural Resource Lands.

A survey of residents of the Cherry Creek Planning Unit discovered that most residents utilized public lands for recreation purposes, but are opposed to preservation of recreation values at the expense of jobs and income. Most also want development of National Resource Lands. Certain specific groups such as the White Pine Sportsmen, the Nevada Outdoor Recreation Association, and the Bristlecone Pine Riders generally oppose development of these lands.

# APPENDIX C

## GRAZING ALLOTMENTS IN THE WSA'S

WSA	Allotment	District Administered By	Class of Livestock	% of Allotment in WSA	No. AUM's Active Preference	Approximate AUM's/WSA
Goshute Canyon	Indian Creek	Ely	Cattle	55%	177	88
	Goshute Basin	Ely	Cattle & Sheep	68%	633	311
	Medicine Butte	Ely	Cattle & Sheep	2%	15,174	400
	Cherry Creek	Ely	Cattle	13%	6,915	375
Park Range	Hick's Station	Battle Mountain	Cattle	20%	180	35
	Snowball	Battle Mountain	Cattle	1%	853	30
	Morey Unit	Battle Mountain	Cattle	10%	450	35
	Duckwater (Hildebrand Use Area)	Ely	Sheep	6%	540	25
Riordan's Well	Duckwater (Currant Ranch Use Area)	Ely	Cattle	6%	2,440	150
	Hardy Springs	Ely	Cattle	5%	5,746	115
	Butterfield	Battle Mountain	Cattle	11%	4,779	200
	Forest Moon	Ely	Cattle	15%	3,980	35
	Reserved for Wildlife	Ely	--	32%		
South Egan Range	Rock Canyon	Ely	Cattle	41%	432	86
	Chimney Rock	Ely	Cattle & Sheep	80%	684	410
	Brown Knoll	Ely	Cattle	42%	135	40
	Sheep Pass	Ely	Cattle	35%	1,150	690
	Six Mile Ranch	Ely	Cattle	7%	162	2
	Cattle Camp/ Cave Valley	Ely	Cattle	7%	6,878	138
	Shingle Pass	Ely	Cattle	51%	2,802	1,500
	Hardy Springs	Ely	Cattle	19%	3,980	1,400

# APPENDIX D

## T&E and Sensitive Species List

<u>Species Name</u>	<u>Status</u>	<u>Management Areas</u>
Bald Eagle ( <u>Haliaeetus leucocephalus</u> )	Endangered	Scattered - winter near open water/wetland. Found in Goshute Canyon, Park Range, South Egan Range, and Riordan's Well WSA's.
Bonneville Cutthroat Trout ( <u>Salmo clarki utah</u> )	Endangered	Goshute Creek - found in Goshute Canyon WSA.
Ferruginous Hawk ( <u>Buteo regalis</u> )	Category 2*	Nests in juniper stringers near white sage flats, most commonly on the east side of valleys. Found in Goshute Canyon, Riordan's Well, and South Egan Range WSA's.
Peregrine Falcon ( <u>Falco peregrinus</u> )	Endangered	Scattered - most common in areas with high concentrations of small birds. Found in Goshute Canyon, Park Range, Riordan's Well, and South Egan Range WSA's.
Spotted Bat ( <u>Euderma maculata</u> )	Category 2*	Rocky ledges - sighted in the Goshute Canyon WSA.
Oneleaf Torrey Milkvetch ( <u>Astragalus calycosus</u> var. <u>monophyllidius</u> )	Category 3C**	Calcareous outcrops - Riordan's Well WSA.

\* Category 2 - Comprises taxa for which information now indicates that proposing to list the species as Endangered or Threatened is possibly appropriate, but for which substantial data are not currently available to biologically support a proposed rule. Further biological research and field study will usually be necessary to ascertain the status of the taxa in this category.

\*\* Category 3C - Comprises taxa proven to be more abundant or widespread than originally believed and/or not subject to any identifiable threat.

## GLOSSARY





# GLOSSARY

**ALLOTMENT:** An area allocated for the use of the livestock of one or more qualified grazing permittees including prescribed numbers and kinds of livestock under one plan of management.

**ALLOTMENT MANAGEMENT PLAN (AMP):** A documented program which applies to livestock grazing on the public lands, prepared in consultation, cooperation, and coordination with the permittee(s), lessee(s), or other involved affected interests. (See 43 CFR 4100.0-5.)

**ANIMAL UNIT MONTH (AUM):** The amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month.

**AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACEC):** Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage in important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

**BENCH:** A series of confluent alluvial fans along the base of a mountain range.

**BENEFICIATION:** The process of concentrating or otherwise preparing ore for smelting.

**CHAINING:** A method of vegetation manipulation consisting of dragging an anchor chain through vegetation to break off or uproot shrubs or trees.

**CHERRYSTEM:** A boundary configuration in which the boundary of a wilderness study area or proposed wilderness is drawn around a dead-end road or other linear feature so as to exclude that road or feature from the wilderness study area or proposed wilderness.

**CHERRYSTEM ROAD:** A dead-end road excluded from wilderness study by means of a cherrystem.

- CULTURAL RESOURCES:** Those fragile and nonrenewable remains of human activity, occupation, or endeavor, reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture and natural features, that were of importance in human events. These resources consist of (1) physical remains, (2) areas where significant human events occurred-- even though evidence of the event may no longer remain and (3) the environment immediately surrounding the resource.
- DESERT LAND ENTRY:** The application under the Desert Land Act of 1877 for arid and semi-arid western public lands for farming purposes. This Act is to encourage and promote the reclamation, by irrigation, of these desert lands. It permits the entry of up to 320 acres of land per individual.
- DISCOVERY:** A term used in connection with mining claims. As stated in a legal ruling which has been upheld in many later decisions, it is "where minerals have been found and the evidence is of such a character that a person of ordinary prudence would be justified in the further expenditure of his labor and means, with a reasonable prospect of success, in developing a valuable mine..."
- DRIFT FENCE:** A fence designed to keep livestock from getting off or on to a range or confine herds to specific elevations.
- ECOSYSTEM:** A complex self-sustaining natural system which includes living and non-living components of the environment and the interactions that bind them together. Its functioning involves the circulation of matter and energy between organisms and their environment.
- ENDANGERED SPECIES:** Any species in danger of extinction throughout all or a significant portion of its range, as identified in accordance with the Endangered Species Act of 1973, as amended.
- FLPMA:** The Federal Land Policy and Management Act of 1976 (Public Law 94-579, 90 Stat. 2743, 43 USC 1701).
- FORAGE:** All browse and herbaceous foods that are available to grazing animals. It may be grazed or harvested for feeding.
- GABION:** A wire-mesh structure filled with stones and sunk in water to provide creek stabilization.
- GUZZLER:** A water catchment which traps and stores precipitation in a water storage area. The water is fed into a trough and made available to wildlife or livestock.
- HABITAT:** All elements of an organism's environment needed to complete its life cycle through reproduction including, but not limited to food, cover, water and living space in the amounts, qualities and locations which the organism requires to complete its life cycle.

**HABITAT MANAGEMENT PLAN:** An officially approved plan for a specific geographic area which identifies wildlife habitat and related objectives, establishes the sequence of actions for achieving objectives and outlines procedures for evaluating accomplishments.

**INHOLDING:** State or privately owned property surrounded by the WSA.

**INSTANT STUDY AREA:** One of the primitive or natural areas formally identified prior to November 1, 1975.

**KEY RANGE:** Range on which a species depends for survival; there are no alternative ranges available.

**KGRA (KNOWN GEOTHERMAL RESOURCE AREA):** An area in which the geology, nearby discoveries or competitive interests, would encourage exploration of geothermal stream or associated geothermal resources.

**LEASABLE MINERALS:** Those minerals subject to lease by the Federal Government. Includes oil and gas, coal, geothermal, phosphate, sodium, potash and oil shale.

**LITHIC:** Pertaining to stone.

**LOCATABLE MINERALS:** Minerals subject to disposal and development through the Mining Law of 1872 (as amended). Generally includes metallic minerals such as gold and silver and other materials not subject to lease or sale.

**LONG-TERM:** Five years or more from the implementation of the Congressionally selected alternative.

**MANAGEABLE WOODLAND:** Any woodland area of 10 percent or greater crown cover located on a slope of 30 percent or less which has existing or potential feasible access.

**METALLIC MINERALS:** Minerals with a high specific gravity and metallic luster, such as titanium, tin, lead, iron, etc.

**MINERAL ENTRY:** Is claim location on Federal lands open to mining for the purpose of exploration or exploitation of minerals located there.

MINERAL RESOURCE POTENTIAL:

High Potential - High potential is assigned to areas when the geologic environment, the inferred geologic processes, the reported mineral occurrences, and the known mines or deposits indicate high favorability for accumulation of mineral resources.

Moderate Potential - Moderate potential is assigned to areas when the geologic environment, the inferred geologic processes, and the reported mineral occurrences indicate moderate favorability for accumulation of mineral resources.

Low Potential - Low potential is assigned to areas when the geologic environment and the inferred geologic processes indicate low favorability for accumulation of mineral resources.

No Potential - No potential is assigned to areas when the geologic environment and the inferred geologic processes do not indicate favorability for accumulation of mineral resources.

**MINING DISTRICT:** A section of country usually designated by name and described or understood as being confined within certain natural boundaries, in which gold or silver or other minerals may be found in paying quantities.

**MULTIPLE-USE:** Balanced management of the various surface and subsurface resources, without permanent impairment of the productivity of the land that will best meet present and future needs.

**NATIONAL REGISTER OF HISTORIC PLACES:** The official list implemented by the Historic Preservation Act of 1966, of the Nation's cultural resources worthy of preservation.

**NATURALNESS:** Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's works substantially unnoticeable." (From Section 2(c), Wilderness Act).

**NATURAL AREA:** An area of unusually natural characteristics where management of recreation activities is necessary to preserve those characteristics.

**OFF-ROAD VEHICLE (ORV):** Any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other terrain.

**OPEN DESIGNATION:** Areas on public lands where motor vehicles may be operated, subject only to standard operating regulations.

OUTSTANDING: 1. standing out among others of its kind; conspicuous; prominent. 2. superior to others of its kind; distinguished; excellent.

PATENTED MINING CLAIM: A claim in which title has passed from the Federal Government to the mining claimant under the mining laws.

PERMITTEE: One who holds a permit to graze livestock on public land.

PETROGLYPH: A form of rock art manufactured by incising, scratching, or pecking designs into rock surfaces.

PINYON AND JUNIPER ENCROACHMENT: The invasion of pinyon pine and juniper trees into a dominant brushland area where pinyon pine and juniper have not previously occurred or in an area where the dominant brushland is essential to the sustenance of wildlife species.

POST-FLPMA: The period of time after the enactment of the Federal Land Policy and Management Act (October 21, 1976).

PRECIOUS MINERALS: Minerals identified as having an intrinsic value. These are the relatively scarce metals such as gold, silver, and the platinum-group metals.

PRE-FLPMA: On or before October 21, 1976.

PRESCRIBED BURNING: Controlled application of fire to wildland fuels in either their natural or modified state, under such conditions of weather, fuel, moisture, etc., as to allow the fire to be confined to a predetermined area while producing the intensity of heat and rate of spread required to achieve certain planned objectives of silviculture, wildlife management, grazing, fire hazard reduction and insect and disease control.

PRIMITIVE AND UNCONFINED RECREATION: Nonmotorized and nondeveloped types of outdoor recreational activities.

PUBLIC LANDS: Lands administered by the Secretary of the Interior through the Bureau of Land Management.

RANGE CONDITION: The present state of vegetation of a range site in relation to the climax plant community for that site. It is an expression of the relative degree to which the kinds, proportions, and amounts of plants in the present plant community resemble that of the climax plant community for the site. Range condition is basically an ecological rating of the plant community. Four range condition classes are used to express the degree to which the composition of the present plant community reflects that of the climax: Excellent (76-100%), Good (51-75%), fair (26-50%), Poor (0-25%).

**RANGE DEVELOPMENT:** Any activity on or relating to rangelands designed to improve production of forage, change vegetation composition, control pattern of use, provide water, stabilize soil and water conditions and enhance habitat for livestock, fish, wildlife and wild horses and burros.

**RANGELAND DRILL:** A piece of machinery used to dig furrows and apply seed at the same time.

**RAPTOR:** A bird of prey.

**RECREATION VISITOR DAY:** A 12-hour period spent in recreation activities by one or more individuals in a public land area. The time may be spent, for example, by one individual for 12 hours or 3 individuals for 4 hours each. This unit helps to calculate recreation use.

**RIPARIAN:** Situated on or pertaining to the bank of a river, stream, or other body of water. Normally used to refer to plants of all types that grow along streams or around springs.

**RESOURCE MANAGEMENT PLAN (RMP):** The basic decision document of BLM's resource management planning process, used to establish allocation and coordination among uses for the various resources within a Resource Area. An RMP is a "land-use plan" prescribed by Section 202 of the Federal Land Policy and Management Act. The RMP regulations appear at 43 CFR 1601.

**ROAD:** A vehicle route which has been improved and maintained by mechanical means to ensure relatively regular and continuous use.

**ROADLESS:** For the purpose of the wilderness review program, this refers to the absence of roads which have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

**SCOPING SESSION:** An early and open process for determining the significant issues related to a proposed action which are to be addressed in the environment impact statement.

**SHORT-TERM:** The five-year period following the implementation of the Congressionally selected alternative.

**SOLITUDE:** 1. The state of being alone or remote from habitations; isolation. 2. A lonely, unfrequented, or secluded place.

**SUITABLE FOR PRESERVATION AS WILDERNESS:** Refers to a recommendation that certain Federal lands satisfy the definition of wilderness in the Wilderness Act and have been found appropriate for designation as wilderness on the basis of an analysis of the existing and potential uses of the land.



**SUPPLEMENTAL VALUES:** Values that may be present in an area under consideration for wilderness, such as ecological, geological, or other features or scientific, educational, scenic, or historical value. They are not required for wilderness designation, but their presence will enhance an area's wilderness quality.

**THREATENED SPECIES:** Any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

**UNIT RESOURCE ANALYSIS (URA):** A BLM planning document which contains a comprehensive display of physical resource data and an analysis of the current use, production, condition, and trend of the resources and the potentials and opportunities within a planning unit, including a profile of ecological values.

**VALID MINING CLAIM:** A mining claim on which a discovery has been made. (See "discovery.")

**VEGETATION MANIPULATION:** Alternative of vegetation by fire, mechanical, chemical, or biological means to meet management objective.

**WATERSHED:** A total area of land above a given point on a waterway that contributes runoff water to the flow at that point.

**WAY:** A vehicle route which has not been improved and maintained by mechanical means to ensure relatively regular and continuous use.

**WICKIUP:** An American Indian hut made of brushwood or covered with mats.

**WILDCAT WELL:** A hole drilled to explore for oil and gas on a geologic structure or in an environment that has never produced.

**WILDERNESS:** An uncultivated, uninhabited, and usually roadless area set aside for preservation of natural conditions. According to Section 2(c) of the Wilderness Act of 1964.

A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.



**WILDERNESS AREA:** An area formally designated by Act of Congress as part of the National Wilderness Preservation System.

**WILDERNESS CHARACTERISTICS:** Key characteristics of a wilderness listed in Section 2(c) of the Wilderness Act of 1964 and used by BLM in its wilderness inventory. These characteristics include size, naturalness, outstanding opportunities for solitude, outstanding opportunities for primitive or unconfined recreation and supplemental values.

**WILDERNESS MANAGEMENT:** The management of lands which have been designated by Act of Congress as wilderness areas.

**WILDERNESS RECOMMENDATIONS:** A recommendation by the Bureau of Land Management, the Secretary of the Interior, or the President, with respect to an area's suitability or unsuitability for preservation as wilderness.

**WILDERNESS STUDY AREA (WSA):** A roadless area or island that has been inventoried and found to have wilderness characteristics as described in the Wilderness Act of 1964.

**WILDERNESS STUDY CRITERIA:** The criteria and quality standards developed in the Wilderness Study Policy to guide planning efforts in the wilderness EIS's. Refer to Appendix A for a list of the criteria.

**WILDLIFE HABITAT IMPROVEMENT:** Any procedure or activity designed to maintain or improve aquatic or terrestrial habitat, including, but not limited to seeding and other methods of vegetative management, water development, fence construction and/or modification and installation of in-stream structures.

**WILLOW WADDLING:** A creek stabilization method using cut bundles of willows buried near the waterline. The cut willows sprout and help hold the soil.

**WITHDRAWAL:** Removal, or withholding, of public lands by statute, or Secretarial order, from operation of some or all of the public land laws ("surface", mining and/or mineral leasing laws).

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