

# Comstock Gold Prospectors

Post Office Box 207891 Reno, Nevada 89515



April 30, 2016

To the Attention of:

Mr. Darin Bloyed, Chairman  
Ms. Carol Shank, Vice-Chairman  
Mr. Pat Irwin, Commissioner  
Pershing County Board of  
Commissioners  
P.O. Drawer E  
Lovelock, NV 89419

Ms. Sara Moffat  
Legislative Assistant  
U.S. Senator Harry Reid (NV)  
Hart Senate Office Building  
Washington, DC 20510  
E-mail:  
[sara\\_moffat@reid.senate.gov](mailto:sara_moffat@reid.senate.gov)

Mr. Jeremy Harrell  
Legislative Assistant  
U.S. Senator Dean Heller (NV)  
324 Hart Senate Office Building  
Washington, DC 20510  
E-mail:  
[jeremy\\_harrell@heller.senate.gov](mailto:jeremy_harrell@heller.senate.gov)

## **Comments on Pershing County Economic Development and Conservation Act Draft Legislation**

### **Introduction**

We are a prospecting club in Nevada with over 400 plus members and have been active for over 25 years. We would like to reiterate our position detailed in our letter of April 4, 2016, that we believe the proposed legislation is overweight regarding proposed wilderness areas. We are recommending that the County Commissioners drop the proposed Bluewing wilderness and other newly proposed wilderness areas from the proposed legislation. A number of WSA's have also been recommended for elevation to Wilderness status. We do not believe that these areas should be elevated to

Wilderness status due to the fact the BLM in their 1991 Record of Decision determined that these areas within the boundaries of Pershing County, are mostly not suitable for wilderness designation.

### **Specific Concerns with the Proposed Bluewing Wilderness Area.**

Comstock Gold Prospectors club (CGP) has an active claim (the Tammy) which is partially within the currently proposed Bluewing wilderness designation area (based on maps dated 7/14/15 and 4/1/16 on Senator Heller's website). Individual club members and others also have claims in this area and those claims are also directly impacted by the proposed Bluewing wilderness area (Figure 1). We have identified 16 active claims in T29N R26E and 13 active claims in T29N R27E.

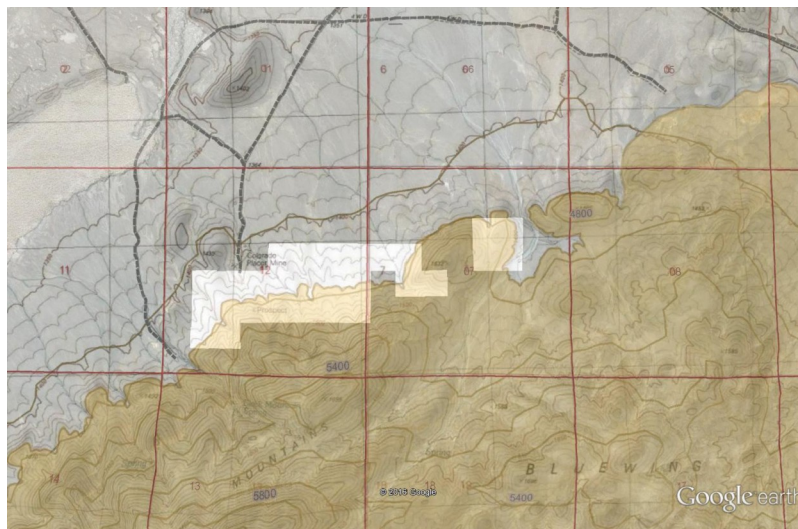


Figure 1 CGP and other active claims in white rectangles.  
Proposed Bluewing Wilderness in tan/brown runs through and over active claims.

The claims outlined in Figure 1 are placer claims. There are also three lode claims in Section 12. The placer deposits consist of free gold that has been liberated from its host rock which is generally quartz vein material. Generally speaking as erosion breaks down the host rock the free gold is liberated and deposited in gravel at lower elevations.

The conclusion to be for this area is that the source of the placer material is likely up slope from the present claim blocks. One claim owner has told me that he observed abundant quartz vein material up slope from the claims. The point here is that the full size and extent of gold mineralization in the northern Bluewing Mountains is yet to be determined. Exploration is ongoing and we anticipate future discoveries and claim locations.

In the southern Bluewing Mountains there are 12 currently active lode claims in Sec 36 T29N R26E and sections 30 and 31 of T29N R27E. This is an area of known base metal sulfide mineralization and the formations in the area are favorable host rocks for silver and base metal deposits.

A search of the BLM's LR 2000 shows listings for 401 closed claims in T29N R26E MDBM and 592 closed claims in T29N R27E. Numerous companies and individuals have identified prospective ground and done exploration in the Bluewing Mountains in the past clearly indicating the area has potential for future discoveries of valuable minerals.

Considering the historic and current level of activity in the Blue Wing Mountains we would urge the County Commissioners to remove the proposed Bluewing Mountain Wilderness Area from the draft legislation. This area needs to be left open for mineral entry so we can have the opportunity for future discoveries.

### **General Comments on other New Wilderness Area Proposals**

CGP strongly believes that any lands considered for new wilderness should first be evaluated by an unbiased independent third party organization. A special emphasis should be placed on assessing the potential for mineral resources at least as thoroughly as was done when evaluating the original WSAs. Only with careful consideration given to those evaluations should any bill be crafted to designate new wilderness.

The following areas are newly proposed for Wilderness status but as far as we know have never been studied by an independent third party such as the BLM Table 1. Due to the lack of a complete review of these areas CGP recommends that these lands be dropped from the bill.

<b>North Sahwave:</b> New never studied.
<b>Bluewing:</b> New never studied.
<b>Fencemaker:</b> New never studied. (95 active claims are in this area).
<b>Tobin Crest:</b> Much of this area is New and never studied. It links the Tobin and China Mountain WSA's which have been found not suitable for Wilderness designation.

Table 1 New wilderness proposals with no comprehensive studies.

### **Wilderness Study Area (WSA) Recommendations.**

These areas were identified for study many years ago to see if they suitable for wilderness designation. The BLM was tasked with this evaluation and their final recommendations can be found on line at:

[http://www.blm.gov/nv/st/en/prog/blm\\_special\\_areas/wsas0.html](http://www.blm.gov/nv/st/en/prog/blm_special_areas/wsas0.html)

The source document for this information is the October 1991 Nevada BLM Statewide Wilderness Report Record of Decision (figure 2). This report states that the

recommendations were developed from the findings of a 15 year study. The study considered each areas resource values including future uses. Mineral surveys from the U.S. Geological Survey and Bureau of Mines were used in conjunction with other data.

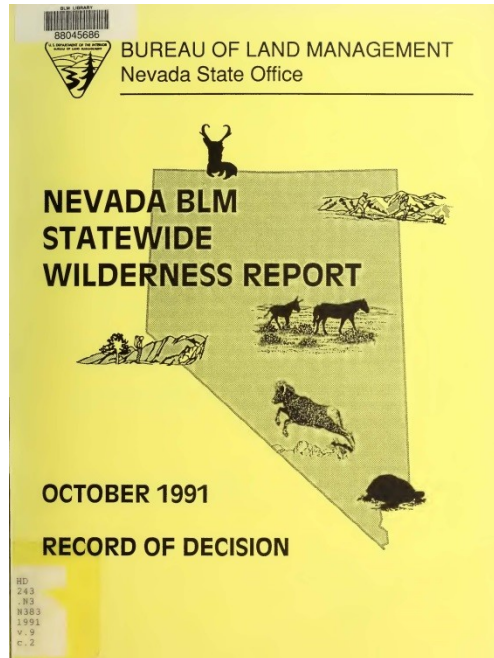


Figure 2 Cover of the 1991 Record of Decision

The 1991 Record of Decision found that only a portion of one of the WSA’s was recommended as suitable for Wilderness status in Pershing County (Table 2). The study further recommended that the non-suitable areas be released from WSA status and returned to multiple use.

<b>WSA</b>	<b>Acres Suitable</b>
<b>Augusta Mountains</b>	0 acres suitable
<b>Selenite Mountains</b>	0 acres suitable
<b>Mount Limbo</b>	12,750 acres suitable out of 23,752
<b>China Mountain</b>	0 acres suitable
<b>Tobin Range</b>	0 acres suitable

Table 2 1991 BLM recommendations for Pershing County WSA’S

We believe the Pershing County Commissioners should follow the recommendations provided in the 1991 record of decision document as they apply to WSA’s within

Pershing County. Additionally, areas considered non suitable should be released from WSA status and returned to multiple use. We also believe the bill should contain language providing for a moratorium on any future Wilderness Area, WSA or Lands with Wilderness Characteristics (LWC) designations.

**Conclusion:**

In closing we would like to emphasize that mineral exploration is one of the critical elements for economic development in Nevada. Mineral exploration is a long term process and it may take multiple exploration efforts prior to making discoveries. We feel it is important that we leave as much public land available for mineral development so we are able to make these discoveries in the future.

Thank you for your attention.

Sincerely,

Jim Richards – President Comstock Gold Prospectors  
Kevin M. Conway Member – Comstock Gold Prospectors/Geologist