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December 16, 2009

Mountain City, Ruby Mountains and Jarbidge Ranger Districts  
Combined Travel Management Project  
c/o James Winfrey  
Humboldt-Toiyabe National Forest  
1200 Franklin Way  
Sparks, NV 89431

RE: Combined Travel Management Plan: Jarbidge, Mountain City and Ruby Mountains Ranger Districts

Dear Mr. Winfrey,

The Northwest Mining Association (NWMA) appreciates the opportunity to provide comments regarding the U.S. Forest Service's revised Travel Management Plan for the Jarbidge, Mountain City and Ruby Mountain Ranger Districts of the Humboldt-Toiyabe National Forest.

In preparing our comments, we are mindful of the Forest Service's responsibility to manage our National Forests in a manner that protects the natural environment and simultaneously promotes sensible multiple uses of the public's lands. We have given careful consideration to the needs of our members, and the general public, so that they may be able to enjoy reasonable access to public lands for the purpose of early-stage mineral exploration and prospecting in a manner that is consistent with the concept of multiple use of the Humboldt-Toiyabe National Forest.

## **NWMA – WHO WE ARE**

NWMA is a 114 year old, 1,750 member, non-profit, non-partisan trade association based in Spokane, Washington. NWMA members reside in 40 states and are actively involved in exploration and mining operations on public and private lands, especially in the West. Our diverse membership includes every facet of the mining industry including geology, exploration, mining, engineering, equipment manufacturing, technical services, and sales of equipment and supplies. NWMA's broad membership represents a true cross-section of the American mining community from small miners and exploration geologists to both junior and large mining companies. More than 90% of our members are small businesses or work for small businesses. Most of our members are individual citizens.

NWMA has more than 300 members residing in Nevada, and many more whose livelihood depends on the state's minerals resources. In fact, America's way of life, standard of living, and even our national security depends in large part on the mineral resources of Nevada and having access to those critical resources.

## **CONCERNS WITH PROPOSED CLOSURES**

In the revised Travel Management Plan, we have serious concerns that numerous roads and motorized trails are recommended for closure on a seasonal basis in order to protect areas such as "heritage" sites, Sage Grouse leks and Northern Goshawk nests. These proposed closures commence in February or March and extend through August or September of each year. Unfortunately, the term of seasonal closure has the net effect of a full closure of these access routes because the time period of closure generally corresponds with that portion of the year when these routes are not covered with snow.

We are especially concerned about the Forest Service's proposal to close roads and trails because of proximity to Northern Goshawk nests. As you know, considerable research has been undertaken in the Northern Independence and Bull Run Mountains of northeastern Nevada regarding the Northern Goshawk - research that was funded by the mining industry in cooperation with the Raptor Research Center at Boise State University, Nevada Department of Wildlife, and the Humboldt-Toiyabe National Forest.

We are aware that the principal investigators of these studies, Dr. Marc Bechard and Mr. James Younk, studied such topics as breeding ecology, nesting behavior, diet and home range size. We recognize that the Northern Goshawk is an indicator species and the health of this migratory raptor population is an indicator of the overall health of the forest. It is our understanding from the studies that casual use of motorized vehicles did no harm to post-fledgling areas or otherwise upset the nesting habits of the goshawk. It also is our understanding that the greatest threat to the continued health of the Northern Goshawk in the Humboldt-Toiyabe National Forest is fragmentation of habitat. Since the access roads proposed for seasonal closure have been in existence for many years, ongoing occasional use by the general public would have no impact on additional habitat fragmentation. Accordingly, we question the need to close public access to the subject roads.

## **NWMA RECOMMENDATIONS**

With particular reference to the U.S. Forest Service 1:48,000 scale maps, dated October 14, 2009, that depict the road and motorized trail network we request that the Humboldt-Toiyabe National Forest not implement any closure, full or seasonal, for the following roads and motorized trails:

<b>Route Designation</b>	<b>Mining District</b>	<b>Ranger District</b>
U-57341	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
U-57118B	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
U-57518B	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
U-5718A	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
R-8463A	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
R-9784	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
R-9788	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
R-8490	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
R-8418	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
R-8442	Corral Creek/Harrison Pass Mining District	Ruby Mountain Ranger District
U-56882A	Schoonover Creek/Coffin Creek	Mountain City Ranger District
M-6892	Schoonover Creek/Coffin Creek	Mountain City Ranger District
M-6999A	Schoonover Creek/Coffin Creek	Mountain City Ranger District
U-56514C	Tennessee Mountain	Mountain City Ranger District
U-56562F	Foreman Creek	Mountain City Ranger District
U-56885D	Jerritt Canyon	Mountain City Ranger District
U-56848A	Jerritt Canyon	Mountain City Ranger District
M-067	Jerritt Canyon	Mountain City Ranger District
M-3323A	Mountain City	Mountain City Ranger District
M-3083A	Mountain City	Mountain City Ranger District
M-2885A	Mountain City	Mountain City Ranger District
M-2885B	Mountain City	Mountain City Ranger District
M-2867B	Mountain City	Mountain City Ranger District
M-15781	Mountain City	Mountain City Ranger District
U-56917E	Mountain City	Mountain City Ranger District
U-56917A	Mountain City	Mountain City Ranger District
U-56170C	Edgemont	Mountain City Ranger District
U-56589A	Edgemont	Mountain City Ranger District
M-1306	Doby George	Mountain City Ranger District
M-2503	Doby George	Mountain City Ranger District
M-2496A	Doby George	Mountain City Ranger District
M-2662	Doby George	Mountain City Ranger District
J-7377R	Elk Mountain	Jarbidge Ranger District
U-56946B	Hicks District	Mountain City Ranger District

## CONCLUSION

The Northwest Mining Association offers our appreciation to the staff of the Humboldt-Toiyabe National Forest, in particular Mountain City District Ranger Tom Montoya, for preparing the revised Travel Management Plan, and the courtesies extended to our members as they prepared our comments. While it would appear NWMA has concerns over the potential closure of a large number of roads and motorized trails in the Humboldt-Toiyabe National Forest, a careful review of our recommendations will show they are consistent with the overall objectives of a healthy forest environment and an ongoing healthy mineral resource industry. In other words, we are supporting the concept of responsible multiple uses of our public lands.

Sincerely,

A handwritten signature in cursive script that reads "Laura Skaer".

Laura Skaer  
Executive Director