

**Friends of Nevada Wilderness (FNW)**  
**Citizen-Submitted Wilderness Characteristics Inventory Information**

CITIZEN NAME: **Excelsior North (Units 1 & 2)**

BLM UNIT NAME: **Excelsior Mountains**

BLM UNIT NUMBER: **NV-030-425**

Narrative documentation of how the Citizen-Submitted information substantially differs from the information in the BLM inventory of the area's wilderness characteristics (as per BLM Manual 6310;.06; B; 1; b; ii.)

**CHARACTERISTICS INVENTORIED:**

**1. Size:** The BLM 1980 Wilderness Inventory documented a total of 66,850 acres of Unit 425. The 2013 FNW Inventory describes this area as 54,464 acres. The 2013 FNW inventory found that the area needed to be divided into two subunits (Unit 1 & Unit 2) because of a constructed route that crosses the range just east of Moho Mountain. Unit 1 consists of 42,722 acres and Unit 2 consists of 8,336 acres. The 2013 FNW inventory found these two subunits individually meet the requirements for LWC consideration.

**2. Naturalness:** The BLM 1980 Wilderness Inventory found that: *"An area of 65,560 acres was determined to be in an essentially natural condition. About 150 acres were deleted from the subunit due to a lack of naturalness."* The 2013 FNW inventory found all 51,058 acres of these combined subunits appeared to be effected primarily by natural processes. (See Wilderness Characteristics Form 2 provided with the FNW Inventory of this unit for more information about the naturalness of this unit.)

**3. Outstanding Opportunities for:**

**A. Solitude:** The BLM 1980 Wilderness Inventory stated: *"[s]olitude opportunities were not deemed outstanding due to the configuration of the roadless subunit, numerous intrusions in the unit, and the presence of several mines, including some active ones within the center of the unit."* The 2013 FNW inventory was unable to determine how the configuration of the unit could adversely affect the outstanding opportunities for solitude within the unit. The 2013 FNW inventory documented historic, un-reclaimed mining activity near the outer edge of the Units, and excluded the most highly disturbed areas. In the intervening 4 decades since the BLM conducted the inventory of unit 425, much of the mining activity has ceased and many of these un-reclaimed mining-associated routes have not been used and are beginning to be naturally reclaimed. Most of these routes show low levels of use and now appear to be recreational in purpose only (see Appendix C: route Analysis documented by FNW for more details). These rarely-used, re-vegetating routes were determined not to adversely affect the opportunities for outstanding solitude within the unit.

The 2013 FNW did find an extensive area in the north part of Unit 1 where the mining activity had been mechanically reclaimed and was already quite re-naturalized and well re-vegetated. The 2013 FNW inventory determined that this naturalized and reclaimed mining activity did not adversely affect the outstanding opportunities for solitude in that region.

Additionally, under contemporary BLM Manual 6310 guidelines, an LWC unit not need "have outstanding opportunities on every acre" to meet the criteria for outstanding wilderness characteristics opportunities. The FNW 2013 inventory concluded that the entire 51,058 acres of Unit 1

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and Unit 2 of the Excelsior North unit met the criteria for outstanding opportunities for solitude. (See the FNW inventory Form 2 submitted for this unit for more details on outstanding opportunities for solitude.)

**B. Primitive and Unconfined Type of Recreation:** The BLM 1980 inventory listed several high quality opportunities for recreation then stated that: *“While some activities, notably day hiking and sightseeing, are possible within the subunits, outstanding opportunities do not exist. The presence of roads and mines deep within the 65,710 acre subunit restricts both the types and quality of recreational opportunities available to a visitor. In addition, water supplies are scarce.”* As mentioned above, most of the mining activity in this region has ceased in the last intervening 4 decades, some of it has been mechanically reclaimed, and much of the mining-associated routes and scars have been washed-out or have fallen into disuse and are being naturally reclaimed. (See Appendix C: Route Analysis documents for more information.)

The 2013 FNW inventory of unit 425 found many outstanding opportunities for primitive and unconfined recreation in the extremely deep and rugged canyons, the extensive pinyon forests of the uplands, the towering granite spires in the west part of the Unit 1, and in the unique opportunities for wilderness hunting of game such as desert bighorn sheep, especially in the rugged metamorphic canyons of Unit 2.

Additionally, BLM guidelines for evaluating LWC have changed in the last 40 years. Under the BLM Manual 6310 policies, “[t]he presence of water is not essential for an outstanding primitive recreation opportunity.” The 2013 FNW inventory found that this Unit offers both outstanding opportunities in several primitive and unconfined types of recreation and a diversity of recreational opportunities. (See Form 2 in the FNW Inventory documents for details.)

**SUMMARY OF PUBLIC COMMENTS:** The 1980 BLM Inventory for Unit 425 stated that the: *BLM received seven specific comments on this unit, all citing roads, intrusions, or lack of outstanding opportunities. Five listed other resource values. Also received were 2,288 general comments stating the unit meets the wilderness criteria.”*

**RATIONALE FOR DECISION:** The 1980 BLM Inventory for Unit 425 stated: *“Even though comments were received both supporting and opposing WSA designation, the evidence available to the Bureau indicates the area does not possess the necessary criteria for WSA designation.”*

Although this may have been an accurate assessment at the time the 2013 FNW inventory demonstrates that the wilderness characteristics of this area have, according to contemporary 6310 standards, substantially changed over the intervening four decades. The wilderness characteristics generated from the FNW 2013 Inventory for Unit 425 substantially differ from the information in the BLM inventory of the area’s wilderness characteristics. Under current 6310 guidelines, FNW recommends that this unit should be re-considered for LWC status.

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**Additional considerations and a historical perspective on differences between the original WSA Inventory conducted by the BLM in the late 1970's and today's inventories.**

Four decades ago the concept of wilderness was new to the BLM and new to the state of Nevada. At that point in time, most wilderness designations had been traditionally in mountainous and forested roadless areas. Nevada's only wilderness at that time was Jarbidge Wilderness in northern Nevada managed by the Forest Service. As a result, the criteria and language for wilderness characteristics was heavily biased toward these very, forest-service oriented "rock and ice" types of terrains. Careful study of the 1980 Nevada BLM Wilderness Study Areas Decisions reveals that many outstanding Nevada roadless areas were dropped from wilderness consideration because they lacked wilderness characteristics that were biased toward alpine environments.

Over the last four decades, the BLM has developed definitions of wilderness characteristics that both aligned with the intent of the Wilderness Act of 1964 and recognized the wilderness potential of low-relief and more arid roadless lands. The current BLM Manual 6310—Conducting Wilderness Characteristics Inventory on BLM Lands (Public), provides a stellar example of removing the alpine-terrain bias from wilderness characteristics. Congress has affirmed this action by the BLM to recognize wilderness in flat and arid regions through designating millions of acres of these terrains, such as the Black Rock Desert and the Nellis Wash, as Wilderness Areas.

FLPMA, passed by Congress in 1976, dramatically changed the mission of the BLM. With the recognition of the value of the public lands and a mandate that these lands would remain in public ownership, the BLM had to scramble to redefine itself. This was a daunting task that required many changes to perspectives within the agency complicated by changing perspectives of the agency externally, i.e. from the public sector. The land management role of the BLM, and the agency's perspective for land use have changed substantially since the original wilderness inventories of the 1970s. In realizing this new mission, the BLM has been dealing with increasingly complex management issues including, threatened and endangered species, increased recreation use, rapidly changing recreation technology, climate change, invasive species, wildlife management, mineral leasing, land exchanges, energy developments, etc. over the last 40 years.

To face this increasing complexity required the BLM to significantly changed agency positions and staffing over the intervening decades. BLM staffing now includes ecologists, biologists, wildlife biologists, botanists, archaeologists, recreation planners, economists, etc, positions that were rare or in the 1970's. The inclusion of this resource specialist staffing created an enhanced scientific approach to resource management and better understanding of ecological connectivity and complexity.

Forty years of growth, development, and ever-increasing urbanization of the west has resulted in wholesale losses of habitat, which in has turn led to more challenges with species such as the desert tortoise and the sage grouse. The newest generation of powerful and high performance ORV's

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combined with current trends for large-scale energy development on public lands (including “fracking,” solar, and wind) is creating ever-escalating threats to the remaining roadless BLM Lands.

All of these factors illustrate the multitude of changes both within the BLM and external to the agency that have radically changed attitudes and policies toward lands with wilderness characteristics. Today the remaining Nevada BLM LWCs have high value for a growing population on a shrinking planet. These same LWCs can provide critical, scientific case-studies for the interaction between diverse habitats as climate patterns shift. Retaining the natural integrity of these LWC will assure that these natural interactions can continue to be monitored into an uncertain climatic future. LWCs provide the critical habitat to accommodate the shifting ecosystems that will result from climate change.

On the ground, the character and use of these BLM roadless areas have changed in the intervening 40 decades. Many of the “roads,” mining, mineral exploration activities, and other human impacts that may have disqualified this area from wilderness consideration in the 1970s have been decades abandoned and are actively being eroded, revegetated, and reclaimed by natural forces. Many of the 1980 WSA Decision disqualifying-human-impacts for this area have become substantially unnoticeable since those WSA inventories were completed.

The general observations outlined above and the specific findings for this unit (found in the first part of this document) illustrate the significant differences between: 1) the inventory information available in the BLM files based on the culture, policy, and observations of nearly 4 decades ago; and 2) the inventory information that is available today, as in the 2013 FNW Inventory of this area. These significant differences provide compelling reasons to reevaluate this unit for LWC status.