

**ENVIRONMENTAL ASSESSMENT  
COVER SHEET**

**Project Title:** Cecil R. – Jackson Exploration Plan of Operation

**Project Type:** Metallic mineral exploration

**Project Proponent:** CR Briggs Corporation  
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**Project Location:** Portions of sections 13, 14, 15, 22, 23, 24, 25, 26, 27, 34, 35, and 36, T22S, R 44E, Mount Diablo Meridian Inyo County, CA. East of Wingate road on the western flank of the Panamint Mountains, two to five miles south of Ballarat, CA.

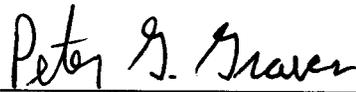
**EA Number:** CA – 065 – 2002 – 082

**Case File Number:** CACA 42806

**Date:** June 10, 2002

**Summary:** This document complies with the NEPA requirements for an Environmental Assessment of the proposed Cecil R – Jackson Exploration Plan of Operations. It examines the impacts of the proposed project as well as the impacts of the no action alternative.

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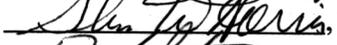
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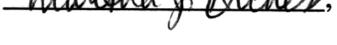
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## **1. Introduction**

The National Environmental Policy Act (NEPA) requires that the Bureau of Land Management (BLM) consider and document environmental impacts prior to making certain decisions. CR Briggs Corporation (“Project Proponent”) has submitted a plan of operations for exploration drilling on BLM administered lands; the Cecil R. – Jackson Exploration Plan of Operations (“Project”). BLM must review this application and decide whether or not to grant approval to the applicant. The decision whether or not to grant approval is subject to NEPA review. This Environmental Assessment (“EA”) satisfies the review requirements.

This document analyzes the environmental impacts and mitigation of impacts associated with the proposed Project. It also determines whether significant impacts would result if the proposed action or alternatives were implemented.

### **1.1 Purpose and Need for the Proposed Action**

The purpose of the proposed action is to develop data to determine the quantity, concentration, and geometry of precious metals deposits in the proposed exploration area. The need for the proposed action is to satisfy free market demand for metals.

### **1.2 Conformance with Land Use Plan**

This proposed action is subject to the California Desert Conservation Area Plan (“CDCA Plan”) approved in 1980 and last amended in 1993. The proposed action has been reviewed to determine whether it conforms with the terms and conditions of the land use plan as required by 43 CFR 1610.5 – 3. The proposed mineral exploration is consistent with the CDCA Plan which recognizes: (1) “The widespread availability of land and access is a crucial factor in maintaining the outstanding productive potential of Geology-Energy-Mineral resources.” (CDCA Plan, 1980, p 95), (2) “All mineral exploration and mining operations on public land under BLM surface administration in Multiple Use Class C, L, M and I will be subject to the Bureau’s surface mining regulations under 43 CFR 3802 and 43 CFR 3809.” And (3) “Under the regulations at 43 CFR 3809, surface disturbing operations will be regulated to prevent undue degradation of the public lands and to provide adequate environmental safeguards...”(CDCA Plan, 1980, p 101).

### **1.3 Relationship to Statutes, Regulations, or Other Plans**

**1.3.1 Federal Land Policy and Management Act.** The Federal Land Policy and Management Act (FLPMA) guides the BLM in administering federal lands under its control. Under FLPMA (Title VI 43 USC 1781 Sec. 601 (a)) The Congress finds that:

- (1) the California Desert contains historical, scenic, archaeological, environmental, biological, cultural, scientific, educational, recreational, and economic resources that are uniquely located adjacent to an area of large population;

- (2) the California desert environment is a total ecosystem that is extremely fragile, easily scarred, and slowly healed;
- (3) the California desert environment and its resources, including certain rare and endangered species of wildlife, plants, and fishes, and numerous archeological and historic sites, are seriously threatened by air pollution, inadequate Federal management authority, and pressures of increased use, particularly recreational use, which are certain to intensify because of the rapidly growing population of southern California;
- (4) the use of all California desert resources can and should be provided for in a multiple use and sustained yield management plan to conserve these resources for future generations, and to provide present and future use and enjoyment, particularly outdoor recreation uses, including the use, where appropriate, of off-road vehicles;
- (5) the Secretary has initiated a comprehensive planning process and established an interim management program for the public lands in the California desert; and
- (6) to insure further study of the relationship of man and the California desert environment, preserve the unique and irreplaceable resources, including archeological values, and conserve the use of the economic resources of the California desert, the public must be provided an opportunity to participate in such planning and management, and additional management authority must be provided to the Secretary to facilitate effective implementation of such planning and management.

**1.3.2 Federal Environmental Review.** The National Environmental Policy Act of 1969 (NEPA), as amended (PL 91-190, 42 USC 4321 et seq.) is the basic national charter for protection of the environment. The Act establishes policy, sets goals, and provides means for carrying out the policy. It is the law under which Environmental Impact Statements and Environmental Assessments (EA's) are prepared. The following excerpts are taken from the regulations at 40 CFR Part 1500 (NEPA).

1500.2 Policy

(b) Implement procedures to make the NEPA process more useful to decisionmakers and the public; to reduce paperwork and the accumulation of extraneous background data; and to emphasize real environmental issues and alternatives. Environmental "documents" shall be concise, clear, and to the point, and shall be supported by evidence that agencies have made the necessary environmental analyses.

1500.4 Reducing Paperwork

(q) Using a finding of no significant impact when an action not otherwise excluded will not have a significant effect on the human environment and is therefore exempt from requirements to prepare an environmental impact statement.

1508.9 Environmental Assessment

- (a) Means a concise public document for which a Federal agency is responsible that serves to:
- (1) Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact.
  - (2) Aid an agency's compliance with the Act when no environmental impact statement is necessary.
  - (3) Facilitate preparation of a statement when one is necessary.
- (b) Shall include brief discussions of the need for the proposal, of alternatives as required by sec. 102(2)(E), of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

**1.3.3 Federal Regulations for Surface Management of Mining.** The regulations at 43 CFR 3809 (“3809 Regulations) were promulgated to implement provisions of the Federal Land Policy and Management Act of 1976 for the surface management of mining. The purpose of the 3809 Regulations is to prevent undue or unnecessary degradation of the Federal lands due to mineral activities. Some of the pertinent environmental standards which would apply to exploration are listed below:

- Access routes shall be planned for only the minimum width needed for operations and shall follow natural contours, where practicable, to minimize cut and fill. When the construction of access routes involves slopes which require cuts on the inside edge in excess of three feet, the operator may be required to consult with the authorized officer concerning the most appropriate location of the access route prior to commencing operations.
- Reclamation shall include but shall not be limited to:
- Saving of topsoil for final application after reshaping of disturbed areas has been completed;
- Measures to control erosion, landslides and water runoff;
- Reshaping the area disturbed, application of the topsoil and revegetation of disturbed areas, where reasonably practicable.
- Operations ...are subject to monitoring by the authorized officer to ensure that operators are conducting operations in a manner which will not cause undue or unnecessary degradation.
- Failure of the operator to prevent undue or unnecessary degradation or to complete reclamation to the standards described in this subpart (43 CFR 3809.1-3) may cause the operator to be subject to a notice of noncompliance as described in 43 CFR 3809.3-2 of this title.

**1.3.4 State Surface Mining Act.** The Surface Mining and Reclamation Act of 1975 (SMARA) is a California law which addresses mining reclamation. The SMARA statutes also apply to mineral exploration. Mineral exploration operations that disturb more than one acre of surface land, or that excavate more than 1000 cubic yards at a single location, must obtain a SMARA reclamation plan. The Inyo County Planning Department is the lead agency for SMARA enforcement at the Project.

**1.3.5 Water Quality Protection.** The federal Clean Water Act (CWA) delegates to the states the authority to regulate certain activities that may affect waters of the United States. The Project would require an industrial storm water permit under Section 402 of the CWA. California implements its delegated authority under the CWA through the State Water Resources Control Board and several Regional Water Quality Control Boards. The Lahontan Regional Water Quality Control Board administers the Project area.

**1.3.6 Air Quality Protection.** The federal Clean Air Act (CAA) delegates to the states the authority to regulate certain activities that may affect air quality. The Project may require an air quality permit. California implements its delegated authority under the CAA through several Air Pollution Control Districts. Management and enforcement of the air quality standards in the Project area are under the jurisdiction of the Great Basin Unified Air Pollution Control District.

**1.3.7 Protection of Wildlife.** A number of public laws, acts and executive orders provide direction to the BLM in managing wildlife resources. Some of these are: National Environmental Policy Act of 1969; Endangered Species Act of 1973 (as amended); Sikes Act; Executive Order No. 11514, Protection and Enhancement of Environmental Quality; Federal Land Policy And Management Act of 1976. The BLM has translated applicable parts of these laws, acts, and executive orders into policies and guidance, which are contained within the BLM manual system. Manual 6840 provides direction to the ‘Special Status Species’ program, with Wildlife Management being guided by BLM Manual 6500.

The Federal Endangered Species Act of 1973 (“ESA”), and the California Endangered Species Act provide for the identification, listing, protection and recovery of threatened or endangered species of animals and plants. The threatened desert tortoise is the primary focus of mitigative and protective efforts in the Mojave Desert area. Consultation with the U.S. Fish and Wildlife Service under section 7 of the Act has produced a biological opinion for exploration projects.

**1.3.8 The California Desert Protection Act.** Among other things, the California Desert Protection Act (CDPA) established Mojave National Preserve, designated Death Valley as a National Park, and set aside millions of acres of wilderness. It also addressed matters that bear directly on the Project. The pertinent sections are:

“NO BUFFER ZONES. – The Congress does not intend for the designation of wilderness areas in section 102 of this title to lead to the creation of protective perimeters or buffer zones around any such wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within a wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.” (CDPA section 103 (d))

“SUITABILITY REPORT. The Secretary [of the Interior] is required, ten years after the date of enactment of the Act, to report to Congress on current and planned exploration, development or mining activities on, and suitability for future wilderness designation of, the lands as generally depicted on maps entitled “Surprise Canyon Wilderness – Proposed”, “Middle Park Canyon Wilderness – Proposed”, and “Death Valley National

Park Boundary and Wilderness 15”, dated September 1991 and a map entitled “Manly Peak Wilderness – Proposed”, dated October 1991.” (CDPA section 106)

Senator Feinstein explained congressional intent of Section 106 as follows:

“Mr. President, on April 13 the Senate passed S. 21, the California Desert Protection Act. I would like to take this opportunity to explain section 106 of the bill. ...[C]ertain wilderness areas in the southern Panamint Range that would have been designated by the bill were eliminated – Middle Park Canyon Wilderness – or reduced in size – Manly Peak, Surprise Canyon, and Slate Range Wilderness Areas, in order to allow mineral exploration and development on the affected lands.”

“The principal beneficiary of this reduction in wilderness designation is a proposed gold mine – the Briggs Mine – that is now in the final stages of permitting. The mine is located in a cherry-stemmed intrusion in the excluded lands. ...S. 21 removes the excluded lands from wilderness study area status and thereby will allow the Briggs Mine operators to mine the Briggs deposit more efficiently and to explore and possibly develop their larger claim block on the excluded lands. Other companies may also become active in exploring these excluded lands.

“In approving the California Desert bill in 1991, the House Committee recognized, however, that if these excluded lands are not developed for their minerals, a future Congress may want to consider again whether they should be designated as wilderness. To that end, the committee included a provision to require the Secretary of Interior to report to Congress in 10 years on the status of mineral exploration and development or mining activities in these areas and on their suitability for future designation as wilderness. I agreed with this provision and included it in S. 21 as section 106.

“The reporting requirement of section 106 does not bind the Secretary or a future Congress to make any particular decision as to the subsequent management of the excluded lands after the submission of the report. However, section 106 clearly contemplates that the Secretary will manage the excluded lands prior to the reporting date so as to facilitate mineral exploration and development.” (Congressional Record, May 5, 1994)

In 1991, the 3,000-acre project area currently proposed for exploration by Briggs comprised part of the lands being proposed for wilderness designation by proponents of the California Desert Protection Act. These lands were later dropped (deleted) from the final wilderness areas approved by Congress in the California Desert Protection Act of 1994. These deleted lands were not retained as Wilderness Study Areas (WSAs) but were released, either as Class L or M multiple-use lands.

The CDPA and Senator Feinstein’s statement make it clear that the CDPA specifically accommodated mineral exploration and development on the Project area, while reserving the

right to reconsider, pending the outcome of such activities, whether these deleted lands should be reallocated and designated for wilderness in ten years time.

**1.3.9 Plant Protection.** It is BLM’s policy to carry out management, consistent with the principals of multiple use, for the conservation of Special Status Plant Species and their habitats. BLM will work to ensure that actions authorized, funded, or carried out do not contribute to the need to list any species as threatened or endangered.

**1.3.10 Protection of Cultural Resources.** Several laws require consideration of cultural resources and Native American concerns. The National Historic Preservation Act (as amended) requires that federal agencies consider the effects of all actions on cultural resources and that effects to significant cultural resources be mitigated. It also requires that federal agencies consult with the relevant State Historic Preservation Officer (SHPO) on these matters. The requirements of the National Historic Preservation Act are currently dealt with under a protocol agreement between BLM and the California SHPO. The National Historic Preservation Act also has provisions for consulting with Native Americans on the effects of proposed actions to archaeological sites or areas of traditional use or concern. The American Indian Religious Freedom Act requires that agencies obtain and consider the views of Native Americans during decision-making. The Religious Freedom Restoration Act requires that agencies ensure that their decisions do not burden the free exercise of religion by Native Americans, especially in terms of access, use, or ritual practice. FLPMA and NEPA also have provisions for providing tribal officials with opportunity to comment on planning and NEPA documents.

#### **1.4 Related Activities**

The Cecil R. – Jackson Exploration Plan of Operations was submitted by CR Briggs Corporation (CR Briggs). CR Briggs operates the Briggs Mine located approximately two miles south of the current application area. The Briggs Mine, and this current exploration project, are located within a block of claims held by CR Briggs on the western flank of the Panamint Range. BLM and other agencies granted approval(s) to the Briggs mine in 1995 following preparation of a joint federal-state EIS/EIR. BLM and other agencies have approved exploration permits for CR Briggs both inside and outside the permit area of the Briggs mine as well as exploration for others on mining claims in nearby and adjacent areas not held by CR Briggs. These exploration permits were granted after preparation of Environmental Assessments. In all, BLM has prepared at least one EIS and six EAs for mining exploration on the western flank of the Panamint Range in the past 10 years. The work from these prior studies, and follow-up monitoring of the mining and exploration operations, comprises an extensive body of environmental knowledge on the Panamint Range and the effects of mining and mining exploration on the area.

In the Panamint Range, CR Briggs currently holds a mining authorization for the Briggs Mine that authorizes up to 577 acres of disturbance (including 50 acres of disturbance authorized for clay extraction in Panamint dry lake), and an exploration permit (the North Briggs – Gold Tooth Permit) that authorizes up to 31 acres of disturbance within the Briggs Mine permit boundary. The approval of this present proposal would expand the Project Proponent’s authorized

disturbance in the Panamint Range and valley to a total of 708 acres on or near a claim block of 12,000 acres (about 6 percent of the total claim block area).

## **2. Proposed Action and Alternatives**

NEPA requires that the EA analyze the proposed action and other alternatives to provide a comparison among feasible alternatives, “thus sharply defining the issues and providing a clear basis for choice among the options by the decisionmaker and the public.” (40 CFR 1502.14) This EA analyzes the impacts of the proposed action as described in the CR Briggs permit application, and of the no action alternative. The no action alternative is the alternative of not approving the exploration plan.

### **2.1 Proposed Action**

CR Briggs Corporation has applied to BLM for permission to conduct exploration activities on the west flank of the southern Panamint Range. The proposed exploration would affect up to 100 acres within a proposed area of approximately 3000 acres. The activity is proposed to take place in portions of sections 13, 14, 15, 22, 23, 24, 25, 26, 27, 34, 35, and 36, T22S, R 44E, Mount Diablo Meridian, Inyo County, California (see Figure 1).

Exploration drilling requires access for drill rigs (roads) and places for the drill rigs to work (drill pads). A drill pad is a more or less level spot in a drill road. The drill rig sets on the drill pad and drills a four to eight inch diameter hole, retrieving pieces of rock as it drills. Sometimes the rock is retrieved as core, other times it is retrieved as drill cuttings. When exploration drilling is complete, the hole is refilled and sealed, and the drill road reclaimed.

The proposed action is the proposal submitted by CR Briggs. Under this alternative, BLM would approve the permit application as submitted by the company, subject to mitigation measures. The following describes where CR Briggs proposes to drill, how they propose to construct their roads and pads, and how they propose to reclaim their roads and pads.

CR Briggs is proposing to conduct exploration drilling to investigate the mineral resources on a portion of the western flank of the Panamint Range. Previous exploration has identified three principal target areas; the Cecil R area, the Jackson area, and the Nostradamus area. All of these areas have been explored in the past and are known to contain gold bearing rocks, although there is not enough information to determine whether or not the areas contain enough ore grade material to mine economically. Figure 1, General Location Map shows the location of the exploration area.

CR Briggs will avoid critical natural resources during the course of operations, including identified archaeological sites and BLM sensitive (wildlife) species. No drilling will be conducted within 200+ feet of any site known to be inhabited by the Townsend’s Bat.

CR Briggs has proposed an exploration area of approximately 3000 acres. Within this 3000 acre area, CR Briggs proposes to disturb up to 100 acres by exploration drilling. CR Briggs proposes to conduct the exploration using techniques specific to the terrain encountered. On the pediment and alluvial fan slopes, the company proposes to use buggy mounted rigs to directly access the

drill sites. Buggy mounted rigs are drill rigs mounted on a chassis having large, low-pressure tires. The chassis is designed to carry the rig over rough terrain minimizing the need for road building. For areas that can be accessed by buggy rig, road construction, if needed, would consist of removing or reshaping occasional obstacles.

CR Briggs will obtain all pertinent state, local and federal environmental permits prior to beginning operations, and abide by the requirements of these permits during the course of operation as a condition of approval. This includes abiding by any fugitive dust emission requirements (Rule 401) of the Great Basin Unified Air Pollution Control District; State requirements of the California Surface Mining and Reclamation Act; requirements of any Conditional Use Permit issued by the County of Inyo, and; any industrial storm water requirements of the Lahontan Regional Water Quality Control Board.

Some portions of the Panamint Range are too inaccessible for buggy rigs to travel unassisted. In these areas, traditional drill access roads would be constructed. Roads would be constructed using bulldozers to side cast roads to a minimum safe width for travel. Construction will be done so as to minimize erosion on newly constructed roads, such as; sloping roads to the fill site so as to shed water, and construction of water bars (or other measures) at intervals to move water off the road.

Access to the Cecil R area would be over several existing roads that connect to Wingate road south of Ballarat. Over 7000 feet of road already exists in the Cecil R. area. These roads would be used whenever practicable, reducing the need for additional road building. Access to the Nostradamas area would require new road construction, beginning at a point north of the Cecil R Mine workings. The Jackson area is very steep and would require new road construction if new drill locations are needed. The company is considering the possibility of helicopter access to the higher portions of the Nostradamas area.

Reclamation of all disturbed lands would take place after the exploration program. Drill holes that do not intercept ground water would be refilled with drill cuttings, and the top three feet of each hole would be sealed with cement grout (holes that intersect the earth's surface are commonly capped with cement for public safety). Drill holes that intercept ground water would be sealed with bentonite from the bottom to a level 50 feet above the static water level in the hole. Once the bentonite seal is placed, the hole would be refilled with drill cuttings and the top three feet sealed with cement grout. The BLM will be provided with pertinent groundwater data, if any is encountered.

Reclamation on the affected area(s) will be initiated no later than 18 months following the completion of exploration. Should CR Briggs submit a plan of operations for the development of a mine before the end of that time, the reclamation of any affected drill sites will be considered as part of that plan.

Drill roads and pads in steep areas would be reclaimed by using a track hoe. From a position on the road surface, the track hoe would reach down the hill to the retrieve side cast material. The material would be placed on the road surface where it would be contoured against the cut slope to blend with the existing terrain. Pre-existing drainages would be re-established; erosion

controls would be re-installed on old roads in their original location. Over-land drill routes would be reclaimed by ripping to relieve compaction. All reclaimed areas would be left in a loose, roughened condition, and would be reseeded as prescribed by BLM. Seeding would be done prior to the onset of winter rains, to maximize seed germination and avoid working on wet, muddy soils.

Some of the drill roads that the Project would use are existing roads that are not subject to any reclamation plan. To the extent that the Project Proponent uses these existing drill roads, these roads would be subject to the reclamation requirements of this plan, resulting in a reduction in total disturbance.

## **2.2 No Action Alternative**

The No Action Alternative means not approving any exploration plan of operations. Under this alternative there would be no new disturbance, and no reclamation.

## **2.3 Alternatives Considered but Not Analyzed in Detail**

An alternative would be to grant only a portion of the requested drill disturbance, say 50 acres instead of the 100 acres requested by the Project Proponent, or approving disturbance in only a portion of the requested exploration area. These alternatives were eliminated from consideration for three reasons: (1) They would not meet the purpose and need of the project proposal, (2) They would change the numerical tally of disturbance and environmental impact, but would not eliminate any single type of impact, and (3) They would not reduce any impact below any known regulatory threshold. (e.g., certain types of actions are considered to be “categorically exempt” from NEPA review due to their impacts being so small as to not be noticeable (also known as de minimis impacts). Some activities proposed to BLM are near the de minimis threshold for some impacts and can be brought below the threshold by minor alteration in their design. Such is not the case here. There are no impacts of the Project that could be brought below any regulatory threshold by merely reducing the Project acreage.

### **3. Affected Resources**

The Project is located in the Mojave Desert region of California. Environmental resources in the Project area are described in the California Desert Conservation Area Plan EIS (1980) and in the Briggs Project Final EIS/EIR (May 1995). Those documents are incorporated herein by reference. In addition, several site specific studies have been completed on the Project area. Those studies are discussed in the appropriate sections.

BLM has considered the following critical environmental elements and finds that they are not affected by the Project, and are therefore excluded from this analysis: (1) Prime or Unique Farmlands, (2) Floodplains, (3) Forestry, (4) Fire Management Objectives, (5) Paleontology, (6) Range, (7) Hazardous or solid wastes, (8) Wetlands and Riparian, and (9) Wild and Scenic Rivers.

#### **3.1 Air Quality**

The Project lies in the Panamint Valley, a portion of the area administered by the Great Basin Unified Air Pollution Control District (“GBUAPCD”). Air quality in the area is generally good. The area is classified as being in attainment, or unclassified due to lack of data, for all national ambient air quality standards (“NAAQS”). The area is classified as being in attainment, or unclassified due to lack of data, for all state ambient air quality standards except PM10 (fine dust). The area is classified as non-attainment for PM10 under state standards (for contextual reference, Lake County is the only county in the state classified as being in attainment for state PM10 standards).

Fine dust is the principal air pollutant in the area. Sources of PM10 are wind erosion of crustal material and dust from vehicular traffic on roads and other human activity, including the Briggs mine. In certain areas within the Project boundary, the soil has been disturbed by prior mineral exploration efforts and has not been reclaimed. Without reclamation, these areas contribute to dust emissions in the area by wind erosion. They may also attract some off road vehicle use that also creates dust by traveling over the disturbed surface. The Project Proponent may choose to use some of these disturbed areas.

PM10 data has been collected in the Panamint Valley around the Briggs Project. Baseline data was collected to support the Briggs Project EIS/EIR, and operational data has been collected at monitoring stations north and south of the Briggs Mine since December 1995.

#### **3.2 Soils**

Soils in the Project area are generally coarse and rocky. They are derived from either the bedrock substrate or alluvial outwash materials and are subject to wind scouring during portions of each year. Soil descriptions are found in JBR (1991). Limited discussions are included as part of the vegetation community descriptions found in the vegetation survey information (CCA et al 1998, and CCA 2001). In certain areas within the Project boundary, the soil has been disturbed by prior mineral exploration efforts and has not been reclaimed. Without reclamation,

these areas are subject to soil loss from wind and water erosion. The Project Proponent may choose to use some of these disturbed areas.

### **3.3 Vegetation**

Vegetation is described in detail in site specific survey documents (CCA et al 1998, CCA 2001 and JBR 1991). CCA (2001) describes site specific surveys to obtain quantitative data on plant communities and to survey the site for sensitive plant species. The 2001 report includes information from the earlier report (CCA et al, 1998) which covered a larger area. In certain areas within the Project boundary, the vegetation has been disturbed by prior mineral exploration and not reclaimed. Without reclamation, these areas have been slow to revegetate. The Project Proponent may choose to use some of these disturbed areas.

**3.3.1 General.** The Project area includes a single major vegetation community, the Mojave Creosote Brush Scrub type. This community is subdivided into five subtypes based on terrain, the subtypes are: (1) bajada, (2) wash, (3) sandy gravelly slopes, (4) mountain slope thin soils and (5) mountain slope deep soils. For mapping purposes, rock outcrops, which are devoid of vegetation, are also considered. Surveys for ground cover, species composition, and woody plant density were conducted in each of the five vegetation sub types.

The survey showed 119 species present from 33 families: 61 annual forbs, five annual grasses, 14 perennial forbs, three perennial grasses, 29 shrubs, and seven sub-shrubs. Of the 119 species observed, only 23 were encountered during the quantitative surveys, indicating that the vegetation communities are dominated by a relatively small portion of the total species count. The other species occur only occasionally. Vegetation cover averages 10 percent over the area, and woody plant density averages 1090 stems per acre.

**3.3.2 Special Status Species.** The study for sensitive plant species included all plants that could occur in the area that are listed under any of the following: (1) the federal list of threatened or endangered species, (2) the list of federal candidate species (3) the state list of rare, threatened or endangered species, (4) the list of state proposed species, (5) BLM special status species list, (6) California Natural Diversity Data Base special plant list, and (7) the California Native Plant Society inventory of rare and endangered plants of California. From these lists, 25 special status plants were found to have some potential to occur in the area. None of the 25 special status plant species were observed in the Project area.

### **3.4 Surface Water**

There are no perennial surface water sources in the Project area. Surface water is limited to sheet flow and concentrated runoff from rainfall events. Due to the limited vegetation cover and coarse nature of area soils, runoff normally contains high levels of sediment. Much of the surface has been shaped by high-energy, flowing water, and its ability to move soils, either through erosion or sedimentation. In certain areas within the Project boundary, the ground surface has been disturbed by prior mineral exploration efforts and has not been reclaimed. These unreclaimed areas contribute to increased erosion in the area. The Project Proponent may choose to use some of these disturbed areas.

### **3.5 Ground Water**

Ground water in the area can be grouped in to two classes, the saline waters found in the valley sediments, and the upland waters found in the bedrock of the Panamint Range. A conceptual ground water model is found in BLM (1995).

Saline waters in the valley are relatively static, with a surface elevation of approximately 1040 ft. This elevation varies somewhat across the southern Panamint Valley, but not much, because it is largely controlled by evaporation from the relatively flat playa on the valley floor.

Upland water tends to be fresher than the valley waters and are found in cracks and fissures in the bedrock. Depth to water in the bedrock is unknown.

### **3.6 Wildlife Habitat**

The area supports a diversity of wildlife species, due to the large elevation difference on the western face of the Panamint Range. However, wildlife population densities are low due to the limited availability of water and food sources, common in a desert environment. The area is not designated habitat for Mojave desert tortoise, nor is it known habitat for Mojave ground squirrel. Tortoise sign has been seen in the Panamint Valley about 5 miles south of the Project (where a tortoise was recorded crossing the road in the vicinity of Coyote Canyon as well as another individual up in the canyon). The nearest Mojave ground squirrel sightings are approximately 10 miles southwest in the Searles Valley, and 15 miles north at Panamint Springs.

Mines in the area support colonies of Townsend's big-eared bat. Ongoing monitoring by CR Briggs confirmed the existence of a colony of Townsend's big-eared bats using the Cecil R Mine during the 2001 maternity season.

The Project and surrounding area could host several raptor species, but none have been recorded as nesting. The following species could use the area for foraging while migrating through the area: ferruginous hawk, Golden eagle, northern harrier, sharp-shinned hawk, Coopers hawk, and prairie falcon. Of these species, only the ferruginous hawk has been sighted in the area.

The Project area provides habitat for Nelson's bighorn sheep and feral burros.

In certain areas within the Project boundary, the ground surface has been disturbed by prior mineral exploration and not reclaimed. Without reclamation, these areas have been slow to revegetate, reducing forage for some animals. The Project Proponent may choose to use some of these disturbed areas.

### **3.7 Wildlife**

Animals in the area have been studied extensively (BLM et al, 1995 and JBR, 1991). The studies have addressed special interest species as well as common species. Two species of concern reside in the area, the Nelson's bighorn sheep and the Townsend's big-eared bat. In addition, feral burros are found in the area.

**3.7.1 Bighorn Sheep.** Nelsons bighorn sheep are known to use the area. A small number of ewes are tied to Redlands Spring (a spring east of the existing Briggs Mine), but use the lower slopes during the Spring. The BLM, Death Valley National Park, California Department of Fish and Game, and CR Briggs sponsored a three-year study of the effects of the Briggs Mine on bighorn sheep. The study (not released) showed no significant impact from the mining operation.

**3.7.2 Bats.** The mine workings at the historic Cecil R mine have been monitored for bats since 1989. Monitoring has included ten visits to the site by wildlife biologists, the most recent being in April of 2002. Townsend's big-eared bats, a CDF&G Species of Special Concern and a BLM Sensitive Species, use the old mine workings. Single males appear to use the northern adits and southern prospects; the central complex is used as a maternity roost. The maternity season begins in May and extends through August. Animal counts ranged from 2 to 20 animals observed per visit over the monitoring history (2002 data not available).

**3.7.3 Burros.** Feral burros roam the desert, including the Project area. BLM is seeking to eliminate burros in the Panamint Range due to their competition with other species, and to coordinate management of this species with Death Valley National Park.

### **3.8 Cultural Resources**

A site-specific Class III cultural resources inventory has been completed (Schaefer and O'Neill 2001). The inventory resulted in location of 5 sites representing historic mining activity. All five sites have been determined to be ineligible for listing in the National Register of Historic Places under terms of the 1997 Protocol Agreement between BLM and the State Office of Historic Preservation.

The report suggests that prehistoric resources were not located during the inventory because of the stark landscape.

Although Prehistoric Native Americans undoubtedly accessed the area for some resources, it may never have been a populated or heavily used location. The project area lacks several attributes which appear to make a location useful. Notably, the area lacks vegetation (and the ubiquitous desert holly, *Atriplex hymenelytra* indicates that water is absent, even by Great Basin standards), contains steep slopes and difficult terrain, and lacks routes to springs in the upper elevations of the Panamint Range (Schaefer and O'Neill 2001:28).

### **3.9 Native American Values**

Because the Timbisha Shoshone Tribe of Death Valley has consistently expressed serious objections to mining in the Panamint Mountains generally and to the CR Briggs operation specifically since consideration of the plan of operations for the current mine, BLM requested that CR Briggs retain an ethnographer to work with the tribe to provide BLM with all information the tribe feels BLM should have in making a decision on the current proposal. In addition to meeting with tribal members and staff, BLM staff, and CR Briggs staff, the ethnographer searched available literature sources for existing ethno-historic information on the project area. This report concluded that, "The ethnographic literature dating back to the early

1800s places the proposed project site within the overall Panamint Shoshone territory. As summarized by Fowler, Dufort, and Rusco, today's Timbisha Shoshone Tribe is 'the primary descendant group representing the whole of what has been called in the anthropological literature "Panamint Shoshone" territory" (1995:2)(Baksh 2002). Kawaiisu were also documented in the southern Panamint Valley, probably on a seasonal or occasional basis. The project area falls within the Timbisha Tribal Homeland as identified in the Timbisha Shoshone Homeland Legislative Environmental Impact Statement and within a few miles of the Timbisha Natural and Cultural Preservation Area as identified in the same document (USDI 2000). Several ethnographers have identified Shoshone names for the Panamint Mountains ((Dayler 1989:41; Grosscup (1977:143, citing Merriam's notes; Steward 1938:95; and Fowler, Dufort, and Rusco 1995:99). Specific locations near the project area were identified but no specific locations or resources were identified within the project area by Shoshone consultants. "Although no specific cultural resources are located within the project site, the Timbisha feel that the proposed project itself is located on an extremely important cultural resource, the Panamint Mountains. They are deeply concerned with the physical devastation of the Panamint Mountains which they believe to be a sacred mountain range . . . the Timbisha Shoshone also described concerns that the proposed project would result in significant visual aesthetic impacts . . . Finally, it should be noted that the Timbisha Shoshone could not think of any appropriate mitigation that could be developed" (Baksh 2002).

### **3.10 Visual Resources**

BLM uses characteristics of color, line and texture to evaluate visual quality. The Project area is visible from distal views on Trona-Wildrose Road, and proximal views from Wingate road.

The distal view of the Panamint Range is highly variegated, with hues ranging from light to dark and colors across the spectrum. Incised canyons in the range face add texture to the range. Dominant lines are formed by the flat playa surface and the fault scarp at the base of the range. The proximal view of the Project area is obstructed in some areas by intervening terrain east of Wingate Road. In some places the face of the range is highly visible, in others it is hidden by large fault scarps near the road. From the proximal view, color is more uniform and texture is dominated by vegetation and rock outcrop. Lines in this view are formed by alluvial fan slopes and lesser fault scarps.

In certain areas within the Project boundary, the ground surface has been disturbed by prior mineral exploration and not reclaimed. Without reclamation, these areas have been slow to revegetate, and remain as changes in color on the west face of the Panamint Range. The Project Proponent may choose to use some of these disturbed areas.

### **3.11 Wilderness**

The Project area is 1.25 miles from the Manly Peak Wilderness to the east and 3 miles from the Surprise Canyon Wilderness to the north. Another wilderness, the Argus Range Wilderness, lies 8.5 miles across the valley to the west.

### **3.12 Outdoor Recreation and Open Space**

Recreational uses of the area are dispersed hiking, camping, rock collecting, four wheeling, and investigating old mining camps. Some visitors come to the area knowing their destination, others set the Panamint Valley as a destination in general, and look for opportunities on arrival. Some visitors who come for four wheeling are attracted by the old mining roads in the area, including, possibly, existing exploration drilling disturbance in the Project area.

### **3.13 Social and Economic Values**

Population centers in the area are Trona, Ridgecrest, and Inyokern. Social and economic values in the area are dominated by the major local employers. Major employers are the tourist trade (driven by Death Valley National Park), the China Lake Naval Air Weapons Station, and mining activities at Trona, the Briggs Mine, and the Rand Mining. Tourism supports a number of low paying jobs in the gift shop and hospitality industries. The Naval Station supports a large number of high paying jobs, and brings stability to the community. Mining supports high paying jobs, but has suffered from low commodity prices in recent years which have caused some reductions in work force.

Social groups largely include people associated with the various basic economic drivers of the area, plus the Timbisha Shoshone Indian Tribe. The tribe is centered in Furnace Creek in Death Valley, roughly 100 miles (by road) from the Project site. The project area has been identified as part of the Timbisha traditional homeland.

#### **4. Mitigation Measures and Impacts**

The following discussion explains the mitigation that would occur for each resource, and then describes the residual impacts of the alternatives after application of that mitigation. Mitigation can come from the applicant's proposal, existing statute or regulation, or stipulations imposed by BLM imposed as a condition of permit issuance. To the extent that mitigation would arise from a permit stipulation, BLM would include that stipulation in any permit it may issue for the described Project. Impacts include all direct, indirect, and cumulative impacts.

Cumulative impacts are the result of all past, present, and reasonably foreseeable future impacts, added together. For the purposes of this EA, the cumulative impact discussion from BLM et. al. (1995) is adopted by reference. The reader should note that development of a mine is not considered a reasonably foreseeable impact of exploration and is outside the scope of this analysis. Most exploration projects are terminated for lack of success in finding ore. Moreover, it is not possible to predict even the most rudimentary elements (e.g., size, type, longevity, processing method, location) of a mine that might be developed in the event that the exploration project were successful. Lacking specifics, any attempt to analyze impacts of a potential future mine development project would be speculative and inappropriate in an NEPA document.

If the Project should result in the location of a mineable ore body, the Project Proponent would be required to file application for a mining plan of operations as per federal regulations. BLM would, at that time, complete an appropriate NEPA review, likely an EIS, that would analyze and disclose any expected impacts of the proposed mine development.

#### **4.1 Air Quality**

##### **4.1.1 Mitigation.**

The proposed action includes compliance with any Rule 401 (fugitive dust emissions) enforced by the Great Basin Unified Air Pollution Control District (GBUAPCD). This rule requires that "a person shall take reasonable precautions to prevent visible particulate matter from being airborne, under normal wind conditions..." The rule also contains prescriptive measures to be taken to minimize dust. BLM would require that the Project be in compliance with GBUAPCD rules.

The Project Proponent has proposed a program of overland drilling that would eliminate the need for some road building. Any access that eliminates road building would reduce fugitive emissions by leaving the desert pavement in place, preventing exposure of fine dust particles to wind erosion.

Reclamation of new disturbances would reduce future dust emissions by revegetating the area and eliminating routes that could otherwise be used by off road vehicles. If the Project Proponent uses some of the old drill roads in the area, the BLM would require that the old roads used as part of the permitted effort would be reclaimed to the same standards proposed for the Project.

**4.1.2 Impacts.** The Project would cause emission of PM10 (fine dust) from traffic and drilling activities. The emissions would be short term and would cease when Project activity ceased. It is expected that Project related sources would be small compared to natural and man-made sources in the area. If the Project Proponent uses some of the old drill roads in the area, there would be a cumulative reduction in dust emissions from the area by reclaiming the old roads.

It is not expected that the cumulative effects of air emissions in the area would cause a violation of the NAAQS.

Under the no action alternative, there would be no short term increase in PM10 emissions in the area. Likewise, there would be no cumulative reduction due to reclamation of old drill roads.

## **4.2 Soils**

**4.2.1 Mitigation.** Upon completion of the Project, the area would be reclaimed. On steep slope areas, reclamation would include pulling side cast material up to the road surface and revegetating the surface. On flatter portions of the area, reclamation would include ripping of compacted surfaces, as needed.

The proposed action includes reclamation of any old drill roads that are used as part of the Project. BLM would determine, in the field, which roads would be reclaimed. Reclamation of old drill roads would be done to the same standards as roads created for this Project.

**4.2.2 Impacts.** For portions of the Project on areas of flatter slope, soil disruption would be minimal. Vehicles would travel over the soil surface and may cause some soil compaction, which would be relieved, if needed. In steep slope areas of the Project, reclamation would minimize future erosion of soil by revegetating the area and minimizing water concentration during runoff events.

If the Project Proponent uses some of the old drill roads in the area, there would be a cumulative reduction in disturbed lands due to the reclamation of the old roads.

Under the no action alternative, there would be no disturbance of area soils, and no reclamation of Project related disturbance. Likewise, there would be no reclamation of old drill roads in the area.

## **4.3 Vegetation**

**4.3.1 Mitigation.** The proposed action includes reclamation of the affected area(s). On steep slope areas, reclamation would include pulling side cast material up to the road surface and revegetating the surface. On flatter portions of the area, reclamation would include ripping of compacted surfaces, if needed. The BLM authorized officer would determine the seed mix to be used in reclamation upon inspection of the disturbed areas in the field. The seed mix would include grasses, forbs and shrubs endemic to this specific area.

Similarly, the BLM would determine, in the field, which roads would be reclaimed. Reclamation of old drill roads would be done to the same standards as roads created for this Project.

**4.3.2 Impacts.** The Project would temporarily remove up to 100 acres of vegetation. Reclamation would reestablish vegetation on the disturbed areas.

If the Project Proponent uses some of the old drill roads in the area, there would be a cumulative reduction in disturbed lands as any old drill roads used would be reclaimed to the same standards proposed for the Project.

Long term impacts would be reduced vegetative productivity on disturbed lands for 50+ years. Eventually the revegetated areas would return to pre-disturbance productivity rates.

The no action alternative would not remove any additional vegetation, but would also not cause current disturbance to be reclaimed.

#### **4.4 Surface Water**

**4.4.1 Mitigation.** The proposed action includes compliance with the conditions of any industrial storm water permit issued by the Lahontan Regional Water Quality Control Board. BLM would further require that all roads comply with standard road construction techniques to minimize erosion on newly constructed roads. Measures include sloping roads to the fill side to shed water as quickly as possible, and construction of water bars or other measures at specified intervals to move water off the road.

Upon Project completion, surface reshaping and revegetation would return the area to a condition similar to that which existed before the Project.

**4.4.2 Impacts.** Under the Project alternative, there would be a small near-term increase in sedimentation due to surface disturbance, especially in steep slope areas. If the Project Proponent uses some of the old drill roads in the area, the Project would result in a small cumulative improvement in surface water quality due to reclamation of the old roads.

Under the no action alternative water quality would remain as it is today, and there would be no reclamation of existing disturbance, thus, water quality around the currently disturbed areas would return to pre-disturbance conditions very slowly, without the accelerated improvement that reclamation would bring.

#### **4.5 Ground Water**

**4.5.1 Mitigation.** If ground water is encountered during drilling, the affected drill holes will be plugged in accordance with BLM and California standards. The BLM would be presented with information on depth, elevation of water, artesian conditions, and such other data pertinent to the description of ground water resources.

**4.5.2 Impacts.** It is not expected that the Project would encounter ground water. Ground water is not expected to be affected by either alternative.

#### **4.6 Wildlife Habitat**

**4.6.1 Mitigation.** Upon Project completion, reclamation would begin the process of restoring lost forage habitat. BLM would require that any old drill roads used as part of the Project operation be reclaimed to the same standards as new roads constructed for the Project.

BLM would require that the Project Proponent maintain a separation of at least 200 feet between any activity and the Cecil R Mine during maternity season for the Townsend's big eared bat.

**4.6.2 Impacts.** The Project would temporarily remove up to 100 acres of foraging habitat for raptors, burros, bighorn sheep, and other species in the area. There would be no habitat reduction for bats. Reclamation would replace the lost foraging habitat. If the Project Proponent chooses to use some of the old drill roads, reclamation would be applied to these areas as well, hastening the process of habitat recovery.

Under the no action alternative, there would be no temporary loss of forage habitat, and no potential for hastening habitat recovery on old drill roads.

#### **4.7 Wildlife**

**4.7.1 Mitigation.** BLM would prohibit road building or drilling operations within 200 feet of known bat habitat during the period beginning on the first of April of each year and extending through September of each year. Exploration workers would be prohibited from entering the maternity roost during this same period. Drilling directly into known mine workings would also be prohibited.

All newly disturbed areas would be reclaimed. BLM would require that the Project Proponent reclaim any old drill roads that are used as part of the Project. Reclamation of old drill roads would be done to the same standards as roads created for this Project.

**4.7.2 Impacts.** Project impacts on bighorn sheep and burros would be to reduce available forage until the reclamation returns forage levels to pre-project levels. However, this impact is expected to be small, as populations of these large species are probably more limited by access to perennial water sources than by limitations in available forage. The animals would also likely avoid using the area while drilling operations were ongoing. These animals can acclimate to human occupation, but are not likely to do so in the short duration of the Project.

Under the no action alternative, impacts to bighorn sheep and burros would be minimal. There would be no short term loss of forage, but also no acceleration of forage recovery, as no reclamation of old disturbances would take place.

The impacts to Townsend's big-eared bats that would be most disruptive would be physical destruction of the habitat that could occur if drills or road building equipment were to penetrate the mine workings. This is followed closely by potential abandonment of the maternity roost that could result from disturbance to the animals during the maternity season. The mitigation that BLM would impose on the Project would prevent these two potential impacts, making impacts to this species not significant.

Under the no action alternative, there would be no impacts.

#### **4.8 Cultural Resources**

**4.8.2 Impacts.** There would be no disturbance of known sites that are eligible for listing in the National Register of Historic Places under either alternative. There would be no residual impacts under either alternative.

#### **4.9 Native American Values**

**4.9.1 Mitigation.** The Timbisha Shoshone feel that there are no mitigation measures that will reduce impacts from mining and related activities to the values they ascribe to the Panamint Mountains. Neither have cultural resource managers devised mitigation measures that they feel address non-intrinsic values, such as sacredness, ascribed to particular places. No mitigation can lessen impacts to aesthetic values that are ascribed by people who do not wish to see changes of appearance in places that are special to them for traditional reasons. The only measure that would reduce or eliminate such measures would be to consider other locations for the activity.

**4.9.1 Impacts.** Under the Proposed Action there would be impacts to sacred and other traditional values. The Timbisha Shoshone who were consulted feel that a sacred place (the Panamint Mountains) is being desecrated by the on-going activity at the Briggs Mine and that approval of the Proposed Action would increase the level of desecration. At least one member complained that greater attention is given to habitat for animal species (such as bats) than to the habitat of the Shoshone people. They feel that their values are not respected and that this reflects an attitude of disrespect toward them. In the years during which agencies have been consulting with Native Americans on such issues, it has become evident that many Native Americans feel genuine and great emotional and psychological pain when permitted actions affect places that are of importance to them. If the Proposed Action leads to full-scale mining and an expansion of Briggs' operations, these impacts would be greatly increased and tribal members expressed great concern that this is what will happen.

Under the No Action alternative there would be no increase in the level of impact to these values over what is already occurring as a result of the current mining activities.

#### **4.10 Visual Resources**

**4.10.1 Mitigation.** Mitigation for visual resource impacts would include reclamation of new disturbances. BLM would require that the Project Proponent reclaim any old drill roads that are used as part of the Project. Reclamation of old drill roads would be done to the same standards as roads created for this Project.

**4.10.2 Impacts.** For the Project alternative, it is likely that the drill roads would not be visible in the distal view, they are relatively small features that would not be highly visible from large distances. In the proximal view, the roads on the steep range face would be visible from vantage points along Wingate Road. Overland drill roads would not be visible at all, owing to their not disturbing the ground surface. The portions of the roads on the steep face would be lighter in color than surrounding areas, as road construction would disturb the desert varnish found on

many of the rock surfaces. It is not expected that the roads would change the texture or add new lines to the view. It is not expected that the new roads would dominate the view.

Impacts of new road construction would be reduced but not eliminated by reclamation. Revegetation would help reduce color contrast with surrounding undisturbed areas, but the change in soil color would remain. If the Project Proponent uses some of the old drill roads in the area, there would be a reduction in historic disturbed lands as any old drill roads used would be reclaimed to the same standards proposed for the Project. The reclamation of historic disturbance would offset some of the Project related impacts, but there would still be a cumulative increase in visual impact in the proximal view.

Under the no action alternative, there would be no new road construction, eliminating this increase in man-made impact, and there would be no reclamation of old drill roads.

#### **4.11 Wilderness**

##### **4.11.1 Mitigation**

Reclaim the disturbance at drill pads, access roads and any associated work areas at the first practical opportunity, consistent with management of the area.

##### **4.11.2 Impacts**

The Project is entirely outside the Surprise and Manly Peak Wildernesses, and has no direct impact to either wilderness.

However, there could be an indirect impact to the perception of wilderness values. The Wilderness Act of 1964, Section 2(c), defines wilderness as an “undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation,” and which “generally appears to have been affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable.” It is further defined as a place that has “outstanding opportunities for solitude or a primitive and unconfined type of recreation.” While it is unlikely that noise from the Project or that the Project itself will be visible to the unaided eye from within either one of the two adjacent wilderness areas due to the intervening terrain, the Project will dominate the immediate approaches to these wildernesses. It will negatively impact the perception of these wilderness areas’ naturalness and remoteness, as well as the wilderness user’s sense of solitude and of opportunities for a primitive and unconfined type of recreation. The residual impacts of this drilling will be negligible, if the drill pads, sites and roads are successfully reclaimed.

Due to the greater intervening distance, it is anticipated that the Project will have little or no effect on the Argus Range Wilderness.

Under the no action alternative, there would be no significant impacts on wilderness.

#### **4.12 Outdoor Recreation and Open Space**

**4.12.1 Mitigation.** Once complete, reclamation would prevent off road vehicle use of Project roads. BLM would require that the Project Proponent reclaim any old drill roads that are used as part of the Project. Reclamation of old drill roads would be done to the same standards as roads created for this Project.

**4.12.2 Impacts.** During Project operation, People who are prospecting for recreational opportunities in the Panamint Valley could chance upon the area and seek to investigate it, leading to a temporary increase in visitor use. In the long run, reclamation would eliminate this impact. Moreover, in the event that the Project Proponent chooses to use some of the old drill roads, those roads would be reclaimed, resulting in a net loss of recreational opportunity for off road vehicles in the area.

Under the no action alternative, there would be no change in recreational use of the area.

#### **4.13 Social and Economic Values**

At any one time, fewer than a dozen outside workers would be brought in to the area to work on the Project. These workers would occupy available hotel rooms or camper slots. They would purchase some goods locally. In total, the impact on the local economy would be negligible.

Economic impacts under the no action alternative, would be much the same as under the Project alternative.

The only significant ethnic community in the area, the Timbisha Shoshone tribe, live over 100 road miles from the project. Effects on this community are described under Native American Values.

## **5. Persons and Agencies Consulted**

The following were consulted during the writing of this E.A.:

California Department of Fish and Game  
Inyo County  
Timbisha Tribe of Death Valley

BLM Preparers:

Glenn Harris, Natural Resource Specialist  
Randy Porter, Geologist  
Judyth Reed, Archaeologist  
Robert Parker, Wildlife Biologist  
Martha Dickes, Wilderness Specialist

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# Cecil R - Jackson Exploration Project

