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Chapter 7 Public Comments and Response on the DEIS

7.1 Public Comments

7.1.1 Introduction

The Notice of Availability for the Pan Mine DEIS was published in the Federal Register on March 22, 2013 at which time the 45-day comment period commenced and ended on May 7, 2013. The BLM held two public comment meetings, one on Tuesday, April 9, 2013 at the Bristlecone Convention Center, 150 Sixth Street, Ely, Nevada and the other on Wednesday, April 10, 2013 at the Eureka Opera House, 31 S. Main St., Eureka, Nevada.

A total of 299 agencies, businesses, organizations, and interested parties provided comments on the DEIS via mail and email. All comments on the Draft EIS that were received were read and given careful consideration. Each comment was included in a comprehensive database, analyzed for its content, and appropriate responses were prepared. In some cases, the comments provided information or suggested changes that were incorporated into this Final EIS.

7.1.2 Demographics

Demographic coding in the database helps to form an overall picture of who is submitting comments, where they live, their general affiliation with various organizations or government agencies, and the manner in which they respond. Demographic coding allows managers to identify specific areas of concern linked to respondent categories, geographic areas, and response types.

Although demographic information was captured and tracked in the comment database, it is important to note that the consideration of a public comment is not swayed by demographics. Every comment and suggestion has value, whether expressed by one or many respondents, and whether or not the comment originates from an address local to the project. All input was considered, and the analysis team attempted to capture all relevant public concerns in the analysis process.

As shown in Table 7.1-1, the majority of commenters (57.5 percent) are located in White Pine County with an additional 57 (19 percent) originating elsewhere in Nevada, and 70 (23.5 percent) from other states (Alaska, California, Colorado, Florida, Idaho, Illinois, Montana, New York, Ohio, Utah, Washington, and Wyoming) or unknown locations.

Table 7.1-1 Demographic Codes

Code	Geographic Area	Number of Commenters
EC	Eureka County, Eureka NV	7
WC	Washoe County, Reno NV	0
WPC	White Pine County, Ely NV	172
ONV	Other Nevada Counties	50
OUT	Outside Nevada	52
UNK	Unknown	18
INT	International	0

Comments were received from various organizations and unaffiliated individuals. Commenters included a variety of local businesses, state and local government agencies, mining industry representatives, as well as unaffiliated individuals and others. The preponderance of commenters were individuals (65 percent) with another 29 percent representing business (Table 7.1-2). Federal, state, county, and local agencies made up less than five percent of commenters. Tribal represented one percent of comment letters received.

Table 7.1-2 Affiliation Codes

Code	Affiliation	Number of Commenters
BUS	Business	88
CNT	County Agency/Elected Official	5
GOV	Federal Agency, Government Employees, Organizations, Unions	4
IND	Individual/Unaffiliated	193
LOC	Local Agency/Elected Official	1
STA	State Agency/Elected Official	4
TRB	Tribal Official/Member	3
UNI	University	1

The form of comments (letter and email) was also tracked. Letters represented 76 percent of all comments received while 24 percent were received via email.

A list of the commenters with demographics data is presented in the DEIS comment and response table in Appendix 7A.

7.1.3 Comment Analysis

Each comment letter was reviewed, comments were identified, and a type code was assigned to each comment to indicate the associated resource or concern so that comments could be sorted and responded to by the appropriate resource specialist.

Table 7.1-3 contains a list of comment type codes that were used to indicate each comment's associated resource or concern.

Table 7.1-3 Comment Type Codes

Code	General Issue Category
ALT	Alternatives to Proposed Action (development or additional) Concern
AQ	Air Quality Concern
CR	Cultural Resources Concern
CE	Cumulative Effects Concern
EJ	Environmental Justice
GEN	General Comment/Concern
GEO	Geology and Minerals Concern
GHG/CC	Greenhouse Gas/Climate Change Concern
HAZ	Hazardous and Solid Waste Materials Concern
INF	Request for Additional Information
LST	Add to mailing list
LUA	Land Use and Access Conformance/Concern
M&M	Mitigation and Monitoring Concern
NAC	Native American Concern
NEG	General Comment, Negative
NS	Noise Concern
OPP-PA	Opposes Proposed Action
OPP-SWA	Opposes Southwest Powerline Alternative
OPP-WRDA	Opposes Waste Rock Disposal Site Design Alternative
PA	Proposed Action
PAL	Paleontological Resources Concern
POS	General Comment, Positive
PRO	Process (comments referring to scoping or NEPA process)
REC	Recreation Concern
RNG	Range Resources (including rangeland health, grazing, wild horses and burros)
SAF	Public Health and Safety Concern
SOIL	Soil Resources Concern
SOC	Socioeconomics Concern
SSS	Special Status Species (plants and animals) Concern
SUP-PA	Supports Proposed Action
SUP-SWA	Supports Southwest Powerline Alternative
SUP-WRDA	Supports Waste Rock Disposal Site Design Alternative
TRAN	Transportation Concern
VEG	Vegetation (not including listed or sensitive species) Concern
VR	Visual Resources Concern
WLF	Wildlife (not including listed or sensitive species) and Wildlife Habitat Concern
WTR	Water Resources Concern

7.2 Comments and Responses

7.2.1 General Revisions to the FEIS

In response to comments received on the DEIS additions and revisions are reflected in this FEIS and are briefly discussed below.

More detailed information concerning climate change has been added to the air sections of the FEIS.

Detailed research is being conducted as part of the ongoing efforts to keep greater sage-grouse off of the USFWS's threatened or endangered species list. As a result, the following has been added to the wildlife sections of the FEIS: a summary of the recent MOU regarding the establishment of a partnership between agencies and mining companies for the conservation and protection of greater sage-grouse and its habitat, information concerning refinement acres of PGH habitat within the project area, and updated baseline ambient noise data collected at the two active leks during the 2013 breeding season.

Additions were made to the wildlife sections in Chapters 3 and 4 in reference to Fish Creek being identified by the USFWS as bald eagle wintering habitat located approximately five miles to the west of the project area.

Updates were made to the wildlife sections of the FEIS concerning a recent spring of 2013 raptor survey conducted within 10 miles of the Proposed Action and Southwest Powerline Alternative.

Additions were made to the wildlife sections of the FEIS in reference to migratory birds and the long-term duration of mining, reclamation, and closure operations, vegetation reestablishment, and the permanent removal of pinyon-juniper vegetation which some migratory birds depend on for habitat. Other additions to the wildlife sections of the FEIS are in reference to pygmy rabbits and clarifying that since suitable pygmy rabbit habitat has been identified, there is the potential for pygmy rabbit to occupy this habitat in the future.

Additions were made to the cultural resource sections of the FEIS in reference to the impacts associated with rerouting a portion of the Lincoln Highway.

Additions were made to the cultural and visual sections of the FEIS in reference to the project area falling within the Great Basin National Heritage Area.

Additions were applied to the visual resources section in Chapter 3 in reference to dark sky resources.

Text additions were made to the Native American religious and traditional sections of the FEIS in reference to clarifying that no traditional cultural properties or sacred sites have been identified within the project area.

Additions were applied to the socioeconomics section of the FEIS in reference to addressing potential tourism and housing impacts, addressing law enforcement, emergency response, fire protection, and education demands, and employee transportation.

7.2.2 Public Comments and BLM Responses

Table 7.2-1 presents all of the specific comments that were received on the Draft EIS. It includes the comment letter number, commenter name, the specific comment, and the BLM's response to the comment. Commenters had the option of requesting anonymity; the names of those who requested it appear blacked out in the comment table. Of note, although some typos and spelling errors have been corrected, comments were generally transcribed verbatim in order to retain the originality of the comments received. Appendix 7A presents all of the comment letters or emails in their entirety.

In responding to comments, every effort was made to address all questions, concerns, and other points presented by the commenter. The "Response" provided by BLM, in many cases, refers to information already contained in the Draft EIS, and provides an explanation or clarification using this information to respond to the comment. Where the comment has resulted in a change in the FEIS narrative, this is indicated in the BLM response. The responses also note where statements are made that are not specific comments on the EIS.

The Letter/Comment ID No. in Table 7.2-1 correspond to the comment number listed on the top of each original comment letter. These original comment letters are located in Appendix 7A.

Table 7.2-1 Comments and Response

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
1	Bert Woywod, Hotel Nevada	Dear Mr. Kriedler: Hotel Nevada, Prospector Hotel and its sister properties employ approximately 160 team members, making us one of the largest private employers in White Pine County. As part of our operation, we own over 200 guest rooms and numerous rental properties. Being in the hospitality industry, we are obviously very excited about MIDWAY GOLD developing the PAN MINE project. The economy of Ely and White Pine County has recently been on a slow-down and this project will be a dramatic turn-about for White Pine County- in other words "a real game changer" for many years to come. Being in daily contact with our local clientele I can assure you that the feedback about the PAN MINE has been totally positive! We are 100% in favor of the PAN MINE project!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
2	John S Lampros, Chairman WPC Board of County Commissioner	Dear Ms. Thomas: White Pine County has been home to a number of mining companies since the early 1900's. Mining in general has provided a stable economy for White Pine County for many years Since the initial location of Midway Gold to White Pine County; the company has proved to be a good neighbor. The company has worked closely and partnered with the citizens, civic groups, businesses, and government bodies for the sustainability of White Pine County. The County Commission appreciates the close working relationship that Midway Gold has established with White Pine County and its residents. The Commission supports the Midway Gold Pan Project. The Midway Gold project will enhance the mining activity in White Pine County. If you should have any questions please feel free to contact our office at 775-293-6562.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
3	Margaret Miller Bath, Doctor of Pharmacy	Greetings: To live in Ely is to eke out existence in a frontier economy! Therefore when a company as solid as Midway Gold brings new jobs, economic development and a strong positive community spirit to Ely and White Pine County, it is time to rejoice. Ely has been my home since I was born here in 1946, with the exception of years attending to higher education. I understand, therefore, how our mining partners are so very important to the overall life of this particular community. In addition they speak to our entire state and nation of values inherent in a free society. Midway Gold has been diligent in observing the requirements that provide for the environmentally sound practices determined by the Bureau of Land Management and other governing entities. Land nearby the Pan Project was used by the Lincoln Highway, the first transcontinental highway in the United States. Our forefathers saw the need for uniting this great land through that project. Today we see the need for uniting our country through the natural resources drawn from this great land. The use of the land today honors the use of the land in the past. It is my hope that the BLM will make haste to approve the projects of Midway Gold that we may continue to rejoice with our new mining partners.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
4	Thomas Oakley Bath & Jennifer Kate Dalley, Parallel Lines Studio	Dear Mr. Kreidler: The purpose of this letter is to voice our support for the Midway Gold Company's planned Pan Mine Project. As citizens who are concerned with the well-being of the natural environment we do not offer this support lightly. We have attended community information sessions, read through literature and talked to mine officials regarding their plans for development in one of the most unique natural features on the planet, and our home, The Great Basin. With the water table in the planned mine location at nearly 900' deep, and a relatively small population of present wildlife in the area, we are comfortable supporting this planned development and are excited to share our high-mountain desert with the entrepreneurs at Midway Gold. We are confident that they will be good stewards of Nevada's most precious resource, our landscape; and welcome them to become the latest addition to an industry that has deep roots in our State. As a company, they have made countless demonstrations of their loyalty and commitment to the community. Through donations to the White Pine County School District and White Pine County Library they have demonstrated that a private company can have a significant impact of the development of a community's youth and education. Beyond monetary donations, they have donated their time and spirit to help make our community a nicer place to live. The people at Midway Gold are good team players, and are already actively contributing to making this place a little better. We offer our support to allowing this project to move forward, and we hope that you see clear to do the same.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
5	Andrew Dale Bath & Margaret Miller Bath, Economy Drug	Greetings: As business owners we want to applaud the efforts of Midway Gold in bringing new jobs and continued economic development to Ely and White Pine County. Economy Drug has been in business since 1946. We know how important our mining partners are to the overall economy of this particular community and of our region, state and nation. Checks and balances exist within federal requirements that mitigate the environmental impact of today's mining activity. Midway Gold has been diligent in observing these requirements. The strategic plan for the Pan Project addresses such issues and honors the history of the land and its inhabitants. We encourage the BLM to make haste now that such requirements have been addressed to approve the further development of this project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
6	Mark Bechtel	I have seen the impact of a mine closure in Ely. I have also seen the community's economy morale and education system thrive when mining is active. Midway Plan will be good for White Pine County. It appears that the mitigation of the negative environmental impact has been well thought out. The design of an alternative for waste rock disposal also seems a good proposal. I will always have concerns about the long range environmental impact but Midway's plan should go forward.	POS, SUP- WRDA	Comment noted.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
7	JaNeal Mathews	The Midway Gold Pan Mine Project serves as a positive for this community. They have been interested in our youth and in giving them incentive to do well in all school activities and for our community as a whole, the jobs that this project will offer will only keep our community going forward.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
8	Steven Earl	Please let Midway start the mine. There are people like myself who need the jobs. I think the company can help better the impact at the site and not mess it up like other companies in the past.	POS	Comment noted.
9	Jim Bath, Bath Lumber Co	Dear Miles Kreidler, I am writing this letter in support of Midway Gold and there proposed Pan Mine project. This mine would be of great positive economic impact on both White Pine and Eureka County. The placement of the mine is a good location with very little negative impact. Midway Gold has shown themselves to be a company that has great interest in the community and has been very generous with financial support throughout the area, especially with our public schools.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
10.1	Sally Gust	My name is Sally Gust, and I am and have been a resident of Ely for the past 57 years. I have a vested interest in this community and am very interested and concerned about what happens in this area. I am also the supervisor of the Nevada Employment Security Office in Ely, which assists the public in finding jobs. I am very interested in any project that brings growth and jobs to this community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
10.2	Sally Gust	I am also an avid wildlife photographer, so I am also interested in what preserves the wildlife in our area. I attended the presentation that was given by Midway Gold and was very impressed with all they have done to make this project happen with minimal disruption to the environment and wildlife.	POS	Statement noted.
10.3	Sally Gust	I really favor the Waste Rock Disposal Site Design Alternative, which will disrupt the least amount of sage brush terrain. They have given a considerable amount time and designated a large sum of money to assure the sage-grouse are not disturbed or harmed. We have photographed the sage hen leks many times.	SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
10.4	Sally Gust	So with this said I feel that the Midway Gold operation is a wonderful thing for this community. It will help provide many employment opportunities, and in this economy that would be very welcomed. I would also say that Midway Gold has been a great asset to our community. They have been involved with the schools and very supportive of community activities helping where ever they can. It is obvious that they are not here to take from the community but to add to the community. I would like to give my support to this project. I think it is important that you hear from people that live in this area. This would be a great project adding jobs to the community. When people are working they now have money to spend. So the entire community could benefit. I also feel the Midway Gold is a very welcomed community partner. They have put forth a great effort to assure that the environment and wildlife will not be harmed. If I can be of further assistance, please don't hesitate to contact me.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
11	Ruben Perez	I am interested in having the mine open because it will benefit all of us. The mine is an interest for the community. I am in favor. Please give more opportunity by opening the mine. I appreciate the interest so we all have more opportunity. Please allow it.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
12.1	Mike Lemich, Country Construction	My name is Mike Lemich, born in Tonopah Canyon, a native of 76 years, leaving only for school and military services. I have been in business here in White Pine County for 50 years. I attribute this good fortune, living in this environment, beautiful country and among great people to the mining industry. During this time, I served on the Nevada Fish and Game Commission for 14 years. Presently, I am serving on the White Pine County commission. This commission has endorsed the Pan project as a body, and I am here supporting this project personally. There is no question of what the Pan project will do for jobs and our economy. This fall, 2013, our community will have an eight million dollar aquatic center built by net proceeds tax. This is mine money, acquired from mines, much like Pan.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
12.2	Mike Lemich, Country Construction	An alternate access road has already been built to avoid a potential impact which was reasonable and right. To re-route a power line 32 miles verses 10 miles is unreasonable and wrong, especially with no evidence of a negative impact.	OPP-SWA	This alternative was crafted to provide greater separation between the power line and the known sage-grouse leks, was considered a reasonable alternative based on technical and economic feasibility, and to reduce impacts to sage-grouse using PPH and PGH.
12.3	Mike Lemich, Country Construction	During my time and involvement, I do not believe major issues related to sage-grouse habitat and protection have been addressed; that's wild horses and predators. Access, site and mining disturbance should be minimal related to the environment, water, and wildlife at this project. Any mitigation related to these issues should be addressed independently, reasonable, and proportionally. The permitting process is very slow, costly and cumbersome. I understand the steps BLM has to take to protect our environment, as well as Midway Gold's obligation to address these issues.	WLF	A mitigation plan to minimize impacts to sage-grouse from only the proposed action and action alternatives is included in the EIS.
12.4	Mike Lemich, Country Construction	Now that everyone has complied and completed their job, in the essence of time, this project should be approved, so we may go forward for the benefit of the State of Nevada, White Pine County and its residence.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
13	Mike Protani	The Midway Gold team appears to have put together a thoughtful project. Project impacts appear to have been sufficiently mitigated. The project will provide positive socio-economic impacts to the East Central Nevada region. Pan should be approved with the mitigation plan as proposed.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
14.1	Kenneth A. Brunk, Chairman, President & CEO Midway Gold	<p>Dear Mr. Kreidler, The following are Midway's comments on the Pan Draft EIS. Socioeconomics-Midway does not believe there will be a housing issue associated with the Pan Mine workforce. The majority of the workforce will be hired from the area and will already have homes in the area. Midway estimates that approximately 20 homes and 40 apartments will be needed for the estimated workforce that does require homes in the area. There are currently 65 to 70 houses listed for sale in the area. To aid in this regard, Midway has purchased 14 lots that are semi-developed at this time, and 12.5 acres of undeveloped land. Midway has procured development companies who will build homes on these lots and properties on an "as needed basis". The builders would build five homes and make them available to Midway first, then sell them on the open market if Midway does not take them. They would build more homes on demand, only as needed. Midway has talked with several builders who would build apartments on a similar, on-demand basis. Midway will also bring in trailers or temporary housing as necessary. Midway believes that these actions will adequately remedy any housing shortage without causing any sort of "over-building" issue for local real estate businesses. Emergency Vehicle/Police Support-First response for critical medical issues will be call for a helicopter from Salt Lake city. For less critical issues, Midway will have an ambulance on site. A call would be made to the White Pine County ambulance service in Ely. Victims would receive immediate care on site, be loaded and transported by Midway's ambulance to a point where the two ambulances meet. The patient would then be transferred to the White Pine County ambulance and take to the hospital in Ely. Midway does not envision any instance where a Eureka County ambulance service would be called upon. Police matters on mine sites are extremely rare. If this service were ever required from Eureka County, the instance would be rare and unpredictable. Midway does not feel that it would warrant any sort of mitigation to Eureka County. Transportation-Midway intends to supply transportation for employees from Ely and Eureka to the mine site. Most likely, this would be by vans or buses, depending on the number of employees from each location. Shared transportation will reduce trips to and from the site, reduce parking area requirements and will be a safer method of transportation of our employees.</p>	SOC	The information provided by Midway has been incorporated into the socioeconomic analysis in the EIS.
14.2	Kenneth A. Brunk, Midway Gold	<p>Sage-grouse Mitigation-Midway believes that with addition of raptor perch protection and line markers on the power line poles and power lines, respectively, within three miles of the two active lek locations, all potential impacts to sage-grouse will have been mitigated and that no additional mitigation should be required. That said, Midway has committed to an independent study conducted by a third party, federal agency that will cost over 1.5 million dollars, and to pay for offsite mitigation based on the actual impacts identified by this study that could reach over 4 million dollars. Consequently, Midway feels that any further mitigation would be extreme and unwarranted.</p>	SSS	Perch deterrents do not completely reduce impacts to sage-grouse from predators. The information provided by Midway will be considered when deciding on mitigation for the project.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
15.1	Nevada Department of Wildlife	Thank you for the opportunity to review and provide comments on the Pan Mine Project Draft Environmental Impact Statement (DEIS). The Nevada Department of Wildlife (NDOW) is concerned with impacts to fish and wildlife resources and their associated habitats within the proposed area.	WLF	The general statements in the letter are acknowledged and are repeated in detail in the comments that were attached to the letter.
15.2	Nevada Department of Wildlife	In review of the document, NDOW would like to support the incorporation of the Southwest Power Line alternative into any project authorization. This alternative will provide additional benefits beyond removing tall anthropogenic features near the associated sage-grouse leks and reducing impacts to preliminary priority habitat by 1,441 acres, as described in the Proposed Action. This Southwest Alternative will reduce duplicative impacts that may be created through the development of other adjacent independent project proposals. Currently, it appears that this Southwest Alternative could service the proposed Gibellini Mine, proposed Gold Rock Mine and possibly a Duckwater residential line; thereby reducing future single use footprint impacts. Collectively, this alternative would result in substantial reductions in future resource impacts, including wildlife and their habitats.	SUP-SWA	Statement noted. A portion of this same power line has been proposed to serve the Gibellini Mine, with potential to also serve Duckwater.
15.3	Nevada Department of Wildlife	NDOW would also like to acknowledge Midway Gold's willingness and cooperation in developing mitigation for project related impacts to the associated sage-grouse resource. We appreciate the BLM and project proponent's efforts to incorporate measures to avoid, minimize and offset project related impacts. Establishment of the Wildlife Working Group (WWG) will be instrumental to ensuring the successful identification, development and implementation of meaningful projects utilizing the best available science. We believe in open communication and in that spirit ask that NDOW be a part of any consultation process related to wildlife issues throughout the life of the project.	WLF	A WWG will be established as required in the mitigation plan for sage-grouse. The BLM will consider establishing a WWG for other wildlife resources for this project.
15.4	Nevada Department of Wildlife	In addition to the general comments above we have attached our more specific comments and corrections that were identified during our review of the Pan Mine Project DEIS. Should you require additional information or clarification regarding this communication, please contact myself or our Mining Biologist, Lindsey Lesmeister at 775-777-2368 or llesmeister@ndow.org.	GEN	Statement noted. This alternative was considered a reasonable alternative based on technical and economic feasibility.
15.5	Nevada Department of Wildlife	Altering the movements of wildlife species affects the individual, and surrounding individuals. Survival, growth, and reproduction at the level of individuals are tied to resources available adjacent to the disturbance, and pressure on the resource. The assumption is that altering the movement patterns of the wildlife species to adjacent habitat wouldn't have an effect on the resource but added pressure on the habitat and wildlife species could affect individuals of a population.	WLF	"Increased pressure on the habitat and wildlife species could affect individuals of a population including survival, growth and reproduction" has been inserted.
15.6	Nevada Department of Wildlife	Under the Eagle Protection Act a 10-mile buffer is mentioned for an appropriate survey area, to capture foraging, and nesting habitat. USFWS was consulted please state this within this paragraph please.	WLF	Language in the Executive Summary as well as in Chapter 4 has been updated.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
15.7	Nevada Department of Wildlife	In the comparative table it should be documented how much less of an impact the Southwest Power Line Alternative is to sage-grouse. Values are provided for other resource impact comparison so the 1,441 decrease in PPH should be displayed.	SSS	The explanation of the Southwest power line alternative having 1,441 fewer acres of PPH as compared to the Proposed Action has been updated in the text in Section 4.8.4.
15.8	Nevada Department of Wildlife	NDOW asks to be consulted prior to the construction of the process ponds to address terrestrial and avian exclusion methods.	PRO	The following language has been inserted into Chapter 2. "NDOW would be consulted prior to construction of the process ponds to address terrestrial and avian exclusion methods."
15.9	Nevada Department of Wildlife	The names of the sage-grouse leks associated with the project on this page and others should be checked throughout the document: The leks are SW Pancake Summit, E Black Point, NE Black Point, and S Silverado Mountains.	SSS	Corrections throughout the EIS have been made to the "Southwest" Pancake lek. The Silverado Mountain lek is not included in this analysis.
15.10	Nevada Department of Wildlife	Scheduling of the ground verification surveys of PGH will need to occur in the very near future if we wish to meet the spring of 2013 deadline.	SSS	Ground verification was completed in June 2013.
15.11	Nevada Department of Wildlife	Please see comment Number 1 (15.1).	WLF	"Increased pressure on the habitat and wildlife species could affect individuals of a population including survival, growth and reproduction" has been inserted.
15.12	Nevada Department of Wildlife	Was the crusher evaluated for it noise output? If not we would like to make sure it is evaluated.	SSS	Cumulative noise impacts were assessed for mining activities, which included haul road traffic, blasting and mining sources, but did not originally include impacts from the crusher. The proposed location of the crusher was nearest the E Blackpoint lek at a distance of 19,972 feet (which is still outside the BLM's requested three mile radius). For modeling purposes, the crusher was assumed to conservatively operate 80% of the time at 95 dBA (Lmax). The crusher is assumed to have a similar Lmax impact level as that of the impact pile driver (95 dBA), a piece of equipment listed in the Roadway Construction Noise Model. The model assumed the impact pile driver was used 20% of the time, whereas the crusher was assumed to operate 80% of the time. The cumulative impacts from mining, blasting, hauling and now crushing activities to the nearest lek (E Blackpoint) were compared

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
				against the threshold (baseline value at the lek +10dBA). The modeled results show that impacts do not exceed the threshold value.
15.13	Nevada Department of Wildlife	"The results show that the maximum noise impacts possible at the nearest lek are within the preliminary threshold range (Table 4.8-2)." There is no table referring to leks and noise. Table 4.8-2 refers to acres of habitat and not noise.	SSS	Table 4.8-2 has been corrected.
15.14	Nevada Department of Wildlife	How can habitat fragmentation be considered a short term minor impact? Areas that take 15 plus years to recover to pre-disturbance conditions should be considered long-term impacts. Most reclaimed sites undergo a vegetation shift and rarely mirror the diversity of the pre-disturbance condition.	WLF	The term "short-term" has been replaced with "long-term." However, reclamation would be completed concurrent with mine construction and development. Consequently, the only parts of the project that will be reclaimed during mine closure are a small part of the North Waste Disposal Area, the facilities area and interior roads. The rest will already have had from 4 to 15 years of growth prior to mine closure at 15 years.
15.15	Nevada Department of Wildlife	Who will do the pygmy rabbit pre-disturbance clearance surveys? 48 hours prior to disturbance mowing the area with potential habitat for pygmy rabbits could help disperse the rabbits.	SSS	A BLM-approved biologist would do the pre-disturbance clearance surveys per Ely District protocol.
15.16	Nevada Department of Wildlife	Mitigation Greater Sage-Grouse: We should firm up which measures Midway will employ versus potentially.	SSS	The word "potentially" has been removed.
15.17	Nevada Department of Wildlife	NDOW has concerns regarding the use of sirens and their ability to habituate raptor's behavior and additional data needs to be provided.	WLF, M&M	The use of sirens has been taken out of the mitigation section, however incorporated into the EPM table in Chapter 2.
15.18	Nevada Department of Wildlife	NDOW would ask that the general comments in paragraph 2 of our letter be consider in the impact analysis." This Southwest alternative will reduce duplicative impacts that may be created through the development of other adjacent independent project proposals. Currently, it appears that this Southwest Alternative could service the proposed Gibellini Mine, proposed Gold Rock Mine and possibly a Duckwater residential line; thereby reducing future single use footprint impacts".	SUP-SWA	The Gibellini Mine and the Gold Rock Mine are reasonably foreseeable future actions and have been addressed in Chapter 5. Regarding this comment and the Duckwater residents, this has been discussed under past and present actions in Chapter 5.

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15.19	Nevada Department of Wildlife	The positive implications of the Southwest Power Line Alternative should be analyzed in the economic and social effects. I believe this would be lesser economic impacts for the proponent, power company, Gibellini Mine and the Duckwater residents.	SUP-SWA	The alternative power line would be more expensive for Midway than the Proposed Action route. A portion of the Southwest Powerline Alternative is supported by the Gibellini Mine as their preferred power supply for the American Vanadium project and will be evaluated in the EIS being done for that project. At this time BLM is not aware that a Plan of Development has been prepared to extend the line to Duckwater. While BLM agrees with the utility of providing power to the Gibellini Mine and Duckwater, the power supplies to these locations are not connected actions to the Pan Project and have not been evaluated in the Pan EIS. However, the Gibellini Mine and Duckwater have been analyzed in the cumulative effects chapter. Also, the justification for the Strawberry line that Mt. Wheeler is putting in was due to Mt. Wheeler's assessment that it would increase stability and use for farming and not just the mines, otherwise it would have been a connected action.
15.20	Nevada Department of Wildlife	Is there a CESA boundary for big game?	WLF, CE	It was determined that impacts to mule deer, and pronghorn antelope would be short-term and negligible; therefore, cumulative effects for big game were not analyzed.
15.21	Nevada Department of Wildlife	Under Sage-Grouse, third paragraph should state: "...disruption of certain wildlife populations and their habitats, including golden eagle." Replace golden eagle with sage-grouse.	SSS	The word golden eagle has been replaced with sage-grouse.
15.22	Nevada Department of Wildlife	Will any monitoring of noise be conducted during construction and operation? We would ask that monitoring be incorporated if the noise modeling depicts impacts close to the proposed threshold of 10 dBA above ambient.	WLF, M&M	Monitoring of noise to be conducted during construction and operation, will be included in the Mitigation Plan. Also, the "Evaluating Response of Greater Sage-Grouse to Mining Activities in White Pine County, Nevada by Pete Coates" will be included in the EIS as a reference.

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15.23	Nevada Department of Wildlife	"Create barriers along access roads" barriers to address what specifically? This mitigation measure needs a more meaningful explanation.	WLF, M&M	Mitigation measure W – 5 now reads as follows "create sound barriers or berms, along access road to limit noise impacts to leks."
15.24	Nevada Department of Wildlife	Adjacent habitat should be defined as NDOW would advocate that mitigation projects stay within the impacted population management unit (PMU).	WLF, CE	The sentence now reads as follows "If adjacent habitat is not available for restoration or enhancement purposes, then Midway would make funding available to the Nevada Mitigation Bank to restore or enhance sage-grouse habitat within the Diamond and the Butte/Buck/White Pine PMUs."
15.25	Nevada Department of Wildlife	Given the status of sage-grouse, it may be worth incorporating the U.S. Fish and Wildlife Service to Wildlife Working Group.	SSS, M&M	The WWG will coordinate with the USFWS when appropriate.
16.1	Donna Bath	I would like to submit a comment in support of the Midway Gold PAN EIS. Midway Gold has shown over the last couple of years, that it is a community oriented company and truly wants to be part of White Pine County. They have been very involved in our community and have supported several local causes.	POS	Comment noted.
16.2	Donna Bath	I feel that their proposed action would be a huge benefit to our community by adding stable, good paying jobs, assisting with the upgrade of houses in our area, assisting with schools, fire and police protection and other needed services and infrastructure.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
16.3	Donna Bath	My family is very supportive of this company and their on-going efforts to obtain permitting to open a new mine in our area. In reading their Draft EIS, I feel that Midway Gold done an outstanding job in identifying and addressing possible impacts that may occur to the air shed, wildlife, etc.	POS	Comment noted.
16.4	Donna Bath	As a private citizen, I do feel that it is very excessive to ask the company to build a very costly additional 12 miles of transmission line to address the possibility of "potential impacts" to sage-grouse. In a State and county that is 97 percent government owned, there has to be some give and take, if not, the human race may have to be placed on the endangered species list as well.	OPP-SWA	Comment noted. This alternative was considered a reasonable alternative based on technical and economic feasibility.
16.5	Donna Bath	I would also like to receive a copy of the Final EIS once it is completed.	INF	The commenter has been added to the mailing list for the Final EIS.

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17	Jim Balderson, P.E., Engineering Supervisor Bureau of Safe Drinking Water	AGENCY COMMENTS: Please be aware that if the proposed Pan Mine will have 15 or more service connections or serve 25 or more people at least 60 days out of a year, the mine will need to become permitted as a public drinking water system. Plans and specifications for the drinking water system will need to be submitted to the Nevada Division of Environmental Protection (NDEP), Bureau of Safe Drinking Water (BSDW) for review and approval prior to construction. Questions or comments should be directed to Jim Balderson at 775-687-9517 or jbalderson@ndep.nv.gov .	WTR	Midway would comply with applicable State regulations for public water supplies.
18	Skip Canfield, Nevada State Clearinghouse State Land Use Planning Agency	The Nevada Division of State Lands and the State Land Use Planning Agency offer the following comments: Please consider the cumulative visual impacts from development activities (temporary and permanent). Some notable activities include proliferation of new roads, poorly-sited and designed structures, lack of co-location of infrastructure and improper lighting, to name a few. The following mitigation measures are suggested: Utilize appropriate lighting: (Support statements contained on page 2-81 of the DEIS). Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices. Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas. A lighting plan should be submitted indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan. Any required FAA lighting should be consolidated and minimized wherever possible. In addition, the following mitigation measures should be employed. Utilize building materials, colors and site placement that are compatible with the natural environment: Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible. Proliferation of new roads should be avoided. For example, the use of compatible paint colors on structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment improve the user experience for others who might have different values than what is fostered by built environment activities. Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications.	VR	Cumulative effects are analyzed in Section 5.15.6. A section has been added to analyze cumulative impacts of night sky lighting. Mitigation measures are included in Table 2.3-9. Shielded lighting fixtures would be used within the mine area. KOPs 1-4 located along U.S. Highway 50, SR 892, and SR 379 would constitute the majority of casual observers in the area during day and night hours. Placement of light fixtures within the mine area would not reduce impacts to those observers. Impacts to observers would include the glow of lights from within the mine area during nighttime operations. The BLM Standard Environmental Color Chart was used to determine the color of ancillary facilities visible from the four KOPs, based on the colors of the characteristic landscape.

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19	Rebecca Palmer, Acting State Historic Preservation Officer	The SHPO supports this document as written.	POS	Statement noted.
20.1	Dave Hoopes, Kimball Equipment	To Whom This Concerns: This letter is to inform you that I am in support of the Pan Mine Project for Midway Gold. This is the project located between Eureka and Ely, Nevada. In review of the impact this project has on the environment and wildlife in the close proximity of the project, I have found this to be very minimal. My livelihood has been supported by mining for my entire career. I have mined phosphate in Idaho, gold in Colorado, sand and gravel operations throughout Nevada. Mining is the backbone of our economy here in Nevada and should be supported by the BLM with a sound review of the environment.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
20.2	Dave Hoopes, Kimball Equipment	The increase of jobs to the area has a large impact to the residence on Nevada. Also, there are opportunities along the way for people such as myself who benefit from mining.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
20.3	Dave Hoopes, Kimball Equipment	The wildlife and ground water are important to us all. Whereas this project has little or minimal effect on these issues, I would encourage your support on getting necessary permits in place as soon as possible. It is my personal feeling that there could be a job for everyone living in our state, who wants to work, to have a mining related income. We should not be a state in recession. Thank You for supporting this Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
21.1	Tom Williams, MA, CPESC VP of Environmental Affairs Midway Gold	Dear Mr. Kreidler: I appreciate this opportunity to comment on the Bureau of Land Management's Draft Environmental Impact Statement (DEIS) for Midway Gold US Inc.'s proposed Pan Mine Project in White Pine County, Nevada. I am a restoration ecologist with over 33 years of experience in evaluating the impacts of mining projects in NEPA documents. Mining projects all have impacts, both positive and negative, to the environment and socioeconomics of the region they are in. However, this particular mine has fewer negative, and more positive effects than any I have worked on over my career.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
21.2	Tom Williams, MA, CPESC VP of Environmental Affairs Midway Gold	I share the concerns about the Southwest Power Line Alternative, as stated in the Northwest Mining Association's letter to you dated today and incorporates the specific concerns identified in that letter by reference as though set forth herein.	OPP-SWA	Statement noted. This alternative was considered a reasonable alternative based on technical and economic feasibility.

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21.3	Tom Williams, MA, CPESC VP of Environmental Affairs Midway Gold	I also recognize the positive attributes of the Waste Rock Disposal Site Design Alternative, which will: Decrease land disturbance by 79 acres. Affect less Preliminary General Habitat for sage-grouse. Reduce the height of the waste rock disposal area and thus decrease the visual impacts from U.S. Highway 50. Reduce construction and reclamation costs while maintaining environmental integrity. Again, thank you for this opportunity to provide comment on this important project.	SUP- WRDA	Statement noted.
22	Jaime Wells	Dear Mr. Kreidler, I am writing as a young woman who is pursuing a career in the mining industry. I began working with Midway Gold in August of last year and could not be more blessed to work for a company with the kind of ethical standards such as I have seen here. There are a lot of companies out there that are interested in profits and profits alone, but Midway is simply not one of them. The experience I am gaining in a very short amount of time working for our CEO, Ken Brunk, is more than many could ask for in several years in a career. I say that because he is leading our company down the correct path, that is, do the job right, do not skip steps and do not forget that it's not rocks that make our business, but people. If you are to permit a mine in Nevada that will make a difference by continually committing to do what is right, then that mine will be Pan. As an economics major who almost majored in ancient Greek, I got to learn about the origin of words. The word "Economics" is from two words, "oikos" (household) and "nomos" (the law). Together they mean the Law of the Household. That was what economics meant centuries ago and that is the way Midway is viewing the development of its business. It's about creating wealth in more than just dollar terms; ensuring that one's response to membership in a community is that of lasting quality, great relationships and creating opportunities for folks to provide for their families. These are the qualities of the Midway Team. We have brought this to Ely and will continue to do so. Rest assured the impact Midway will have in the community may not be measurable in terms of the "non-dollar wealth", but it will be REAL and it will be POSITIVE. I also believe that Midway will reclaim the grounds to a more habitable status after operations than they currently are today and that will be because we will do things the right way, not skip any steps. We will perform quality studies to assess environmental impacts as we go and are committed to ethically and appropriately mitigating those impacts as they are observed. It is these REAL and healthy impacts that an impact statement should certainly consider. It is for these REAL and POSITIVE impacts that Midway should be granted its permits in a timely manner to continue as the good stewards we have committed to be.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
23.1	Jane Wilbourn	Gentlemen: I believe the Pan Project would be in the best interest of Nevada and of the United States.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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23.2	Jane Wilbourn	The Project will create jobs which will help the entire economy of Nevada. The limited environmental impact will be outweighed by the economic and human benefits. The permit should be approved.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
24	Andrea Westland	I am a resident of White Pine County, Nevada. The proposed gold project by Midway would be a great asset to our little town. The jobs would bring families and therefore the growth of more residual jobs and revenue for the town and county. More revenue and a greater population would bring more funds into our schools. Just 100 more jobs would bring that many more families and with more families, a growth to our town. We would be able to start a senior league baseball program for our youth, and other activities. This is a community that is a positive environment for kids and families. We would like to see more growth and that will be accomplished with this mining project. Please allow this project to continue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
25.1	Jared Webley	Dear Mr. Kreidler: I sincerely appreciate the opportunity to comment on the DEIS for Midway Gold's Pan Mine project. I support this project primarily because of the tremendous economic impact it will have on the people of White Pine and Eureka County. I think the people in these counties deserve the 160 jobs during the one-year construction phase of the project and the 150 family wage jobs during operations. I've been to White Pine County many times over the years and I anticipate visiting the County many more times in future years. I would like to see the overall annual labor payroll increase by more than 11 million dollars, because of this project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
25.2	Jared Webley	Another reason the Pan Mine is an excellent project is because there are hardly any negative effects on water. With the evaporation level at Pan being substantially greater than the precipitation, this is a great project from an environmental standpoint. And because there's so little water, the local region has little wildlife. Please approve a DEIS that will allow Midway to begin production as soon as possible. There are too many people looking for work and projects simply don't get much better than that of the proposed Pan Mine project.	POS	Statement noted.
26	Danny Marmillion, CGS Mule	Dear Mr. Kreidler, I am sending you this note to voice my support for the Pan Mine project. I am a small business owner in Nevada supporting the local geologist and mines. As you know, it is a super tough time in our industry and has put a lot of pressure on small businesses. If we cannot get projects like the Pan Mine approved I will be forced to lay off some great employees this winter. I hope this note finds you well and gives you a perspective from the small business community that needs these companies to be successful.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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27.1	Laura Skaer, Exec Director Northwest Mining Assoc	Dear Mr. Kreidler: The Northwest Mining Association (NWMA) appreciates this opportunity to comment on the Bureau of Land Management's Draft Environmental Impact Statement (DEIS) for Midway Gold U.S., Inc.'s proposed Pan Mine Project in White Pine County, Nevada. INTRODUCTION NWMA is a 118 year old, 2,300 member, non-profit, non-partisan trade association based in Spokane, Washington. NWMA members reside in 42 states and are actively involved in prospecting, exploring, mining, and reclamation closure activities on BLM and USFS administered lands, as well as private/patented and state lands, especially in the West. Twenty-two percent of our members reside and work in Nevada. 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.	GEN	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
27.2	Laura Skaer, Exec Director Northwest Mining Assoc	GENERAL AND SPECIFIC COMMENTS First, we compliment the BLM and Midway for working to develop a strong project that will provide good-paying jobs in rural Nevada while protecting the surrounding environment, including water resources and sage-grouse. We support the implementation of Midway's Proposed Action and the incorporation of the Agency's Alternative design of the waste rock disposal area.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
27.3	Laura Skaer, Exec Director Northwest Mining Assoc	We oppose, however, the Agency's Southwest Power Line Alternative.	OPP-SWA	Statement noted.
27.4	Laura Skaer, Exec Director Northwest Mining Assoc	We support the Waste Rock Disposal Site Design Alternative, which will: decrease land disturbance by 79 acres, affect less Preliminary General Habitat for sage-grouse, reduce the height of the waste rock disposal area and thus decrease the visual impacts from U.S. Highway 50, reduce construction and reclamation costs while maintaining environmental integrity.	SUP- WRDA	Statement noted. The effects of this alternative noted in the comment are evaluated in the EIS.

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27.5	Laura Skaer, Exec Director Northwest Mining Assoc	We oppose the Southwest Power Line Alternative. The reasons include: Although this alternative would reduce surface disturbance impacts to lands currently identified as PPH, this alternative would increase direct impacts to 764 acres of lands currently thought to be PGH. In light of the extensive on-site and off-site mitigation measures being offered by Midway, as outlined in the Pan Mine Project Mitigation Plan, this trade-off is not warranted and should not be part of the Agency Preferred Alternative. Moreover, the USGS sage-grouse study that Midway has agreed to fund as part of the Pan Mine Project Mitigation Plan may modify the extent and location of the PPH and PGH as well as refine the understanding of the seasonal uses in each habitat area. Consequently, it would be inappropriate for BLM to select the Southwest Power Line Alternative as the Agency Preferred Alternative based on the current map of PPH and PGH because there is significant likelihood that these boundaries will change as a result of the USGS study. It is important to remember that the current map is preliminary and shows areas thought to represent Preliminary Priority Habitat and Preliminary General Habitat. Because the Pan Mine Project Mitigation Plan includes extensive mitigation for unavoidable impacts to PPH, selection of the Southwest Power Line Alternative would inappropriately elevate protection of PPH above all other land use objectives. Selection of this would be inconsistent with the mandate in the Federal Land Management and Policy Act (FLPMA) to balance resource uses. For this reason, BLM cannot select the Southwest Power Line Alternative.	OPP-SWA	<p>Statement noted. The NWMA's comments on the Southwest Power Line Alternative will be considered by BLM.</p> <p>The habitat boundaries currently being utilized are the best available data; however, future research, including that being conducting by the USGS, is ongoing and could potentially increase or decrease habitat boundaries. This has been added to Chapter 4: "The access road and power line have the potential to cause habitat fragmentation, which may disrupt migration movement between leks and nesting and brood rearing habitat. Little is known about sage-grouse habitat use within the PMU; however, the USGS is currently conducting a study that could help in defining sage-grouse movement patterns."</p>
27.6	Laura Skaer, Exec Director Northwest Mining Assoc	Midway's Proposed Action, including placement of the power line along the access road corridor fully complies with all requirements in BLM's 43 CFR 3809 Surface Management Regulations to prevent unnecessary and undue degradation. The Proposed Alternative power line route is consistent with BLM's surface use and occupancy regulations at 43 CFR 3715.0-5 and Midway's rights under the U.S. Mining Law to use public lands for ancillary uses that are reasonably incident to its mining operation. BLM's surface management regulations at 43 CFR 3809.420(b)(7) mandate "The operator shall take such action as may be needed to prevent adverse impacts to threatened or endangered species, and their habitat which may be affected by operations." Greater sage-grouse is a candidate species – not a listed threatened or endangered species. The mitigation measures described in the Pan Mine Project Mitigation Plan go far beyond the requirements for protecting a candidate species. Both BLM and Midway should be applauded for taking such proactive steps to minimize and mitigate impacts to Greater sage-grouse. In light of the extensive sage-grouse protection measures in Midway's Proposed Action – which include the Mitigation Plan – the Southwest Power Line Alternative does not represent a meaningful or practical environmental enhancement compared to the Proposed Action and should not be included in the Agency Preferred Alternative. The	M&M	<p>Statement noted. The NWMA's comments on the Southwest Power Line Alternative will be considered by BLM.</p> <p>The Southwest Power Line Alternative was analyzed to avoid active sage-grouse leks. Chapter 2 Alternatives Considered but Eliminated from Further Analysis, analyzed other alternatives to avoid active sage-grouse leks; however, were eliminated from further analysis due to cost and terrain issues. Although the greater sage-grouse is currently a Candidate species, it has been identified by the USFWS that conservation of this species is critical to avoid listing of the species as Threatened or Endangered under the Endangered Species Act.</p>

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		Southwest Power Line Alternative is without merit due to the increase in surface disturbance, the potential for adverse impacts to other important avian species, and the substantial increase in costs to Midway.		
27.7	Laura Skaer, Exec Director Northwest Mining Assoc	We support a prompt Record of Decision regarding the Pan Mine for several reasons; including the fact it will strengthen the economy in White Pine, Eureka and neighboring counties. The economic benefits include:160 jobs during the one-year construction phase, 150 family wage jobs during operations, a majority of the workforce will be hired from the local region. The overall annual labor payroll for this project will be more than 11 million dollars. Property taxes are expected to bring in 1.2 million dollars per year. Nevada purchases are expected to total 20 million dollars per year. This project's overall capital investment is 100 million dollars. The net proceeds tax is expected to bring in 28 million dollars with a gold price of 1550 dollars /oz. Again, thank you for this opportunity to provide comments on this important project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
28	Michael Uliana Technical Sales Manager TMEIC	As a Nevada resident, I am thrilled to be in a progressive work state, especially since I lived in So. California for 10 years before moving to Nevada in 2005. I would like to mention a story that happened to me last year in Seattle during the Society of Mining Engineers Annual Meeting. While eating dinner at a local restaurant I got in a conversation with the lady next to me and my job of selling equipment to the mining industry came up. Well, you can imagine that she immediately got on the offensive of how destructive an industry it is and how it destroys the environment. After 30 minutes of conversation discussing how mining now is very environmentally conscious. We discussed the fact that if it isn't grown, it's mined and if she looked around Seattle, it polluted more than all the mines in the west combined. If she enjoys living in the city and all the products that mining produces, she needs to work with the industry instead of against it. Outsourcing to other parts of the world do not help environment, probably hurts it in the long run. I do live in Lake Tahoe and am very environmentally conscious. However, I also understand the need to find the happy medium of creating jobs, producing in America and reclaiming the land after the mine is played out. Surprisingly, at the end of this conversation, I believe she may have actually believed we need to mine in USA and understood that in today's world, mining companies are very proactive in safety & environmental conservation. I have seen the plan for the Pan Mine and am impressed with the impact studies and plan for this mine. It was interesting to learn that due to lack of water at mine site, the only wildlife impact was in the 2 to 3 mile range on access road. TMEIC will benefit from this project with support position for pump control requirements as the mine grows along with the equipment supplied during the construction stage. Nevada needs this for all the mine jobs and peripheral jobs that it would support. I personally support this as we need to start bringing jobs back into America, especially core industry jobs. I look forward to final permitting of this mine. As noted, I believe it is good for Nevada, good for TMEIC and good for America.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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29.1	Eureka County Board of Commissioners	We appreciate the opportunity, as a Cooperating Agency on the Pan Mine Project Environmental Impact Statement (EIS), to review the Draft EIS (DEIS) and provide comments and input. We do want to make it clear that we support mining and the Pan Project. However, this support is based on our belief that the Project must be done right and with limited impact and/or mitigation of all negative impacts due to the Project. Although not in Eureka County, the Pan Project (Project) will affect resources and citizens of the County. Both the Eureka County Master Plan and County Code call for us to be actively involved in the permitting and management processes of any project that may affect Eureka County. We have participated in the review of both Preliminary DEIS (PDEIS) for the Project. We are gratified that a fair number of previous comments were incorporated into the current DEIS. These changes helped to clarify a number of important concepts or correct factual errors. We also received the response to our comments on the PDEIS which has helped us to get a feel why some of our previous comments affected no change in the DEIS. Please adequately consider our remaining comments and concerns outlined below for incorporation into the Final EIS (FEIS).	GEN	Statement noted.
29.2	Eureka County Board of Commissioners	Socioeconomics 1. As we commented on the PDEIS, little has been done to quantify the fiscal and social impacts tied to the Project. In most cases there are subjective statements such as "increase demand" or "changes expected." The only places we could see any quantification was in terms of hard numbers reasonably known such as employment, taxes, and spending. We understand the difficulty in defining a specific impact of the Project due to population growth and increased demand in services. At the very least, the EIS should make it very clear that the burden upon Eureka County will remain largely unmitigated because of the lack of revenues from the Project to address these strains. As we advocated on the PDEIS, there could be some type of analysis done which provides a range of potentials from low to high (as we advocated and accomplished on the Mt. Hope EIS). Since Eureka County is in the position to be affected by the Project yet receiving limited, if any, revenues from the Project it is important for us to have a grasp on the scope of the potential impacts to our citizenry and County taxpayers. Please take the time to include a range of expected and quantified projections. We welcome the opportunity to work with BLM on addressing this concern.	SOC	The requested additional analysis for socioeconomic impacts has been added to the FEIS.
29.3	Eureka County Board of Commissioners	General Comments Regarding Maps 1. In previous reviews of the PDEIS, we brought it to the attention of the BLM that maps mislabel Hydrographic Area or Basin Boundaries as "Hydrographic Subbasin Boundary." The text properly refers to "Sub-basins", but maps continue to use the misspelling "Subasins" in the legend/explanation.	WTR	The Figures have been corrected to properly refer to "sub-basin".

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29.4	Eureka County Board of Commissioners	2. In previous reviews of the PDEIS, we brought it to the attention of the BLM that some maps show the Eureka/White Pine County line, but the symbol for the county line is not provided in the legend for some figures in the DEIS.	GEN	All the maps in the EIS have been corrected to show the symbol for the county lines in the legend.
29.5	Eureka County Board of Commissioners	3. There are instances where figure titles were apparently used as place holders (figure title in bold text), but the figures were not inserted. Examples: • Last line on page 3-24, "Figure 3.2-8... ."The figure is also missing in the CD-ROM version of the document.	GEN	Figure 3.2-8 has been corrected in the FEIS.
29.6	Eureka County Board of Commissioners	4. Our review of the first PDEIS identified a misunderstanding of the information provided by the Basin Summary for Newark Valley and how it affected the discussion of potential impacts to water resources. In particular, the quantity of committed water rights was misconstrued as the amount of water currently being put to use. This was corrected in Chapter 3 of the DEIS but did not "flow through" to other sections. The DEIS would benefit from careful technical editing such that changes in one section need to be applied to any other relevant chapters.	WTR	JBR has updated Section 5.5.3 and Section 5.5.6 to reflect the distinction between wet water rights and paper water rights. Sections 3.2.3 and 4.2 and Table 2.6-1 accurately reflect the distinction between paper and wet rights as written. See also responses to Comments 29.18 and 29.19.
29.7	Eureka County Board of Commissioners	5. We realize that the hydrogeologic cross sections in the DEIS are meant to be conceptual, but there should be some consistency from one figure to the next so it is clear to any technical person who reviews the document that the BLM has a clear understanding of the hydrogeologic regime. For example: • Figure 3.2-4 shows an easterly hydraulic gradient from Little Smoky Valley toward the Project. • Figure 4.2-1 shows a westerly hydraulic gradient through the project toward Little Smoky Valley.	WTR	The two figures included in the comment, 3.2-4 and 4.2-1, indicate the approximate location of the carbonate aquifer water table. Although they are at different scales, the two figures do appear to be consistent with each other in showing a nearly flat gradient under the immediate project area.
29.8	Eureka County Board of Commissioners	6. If it is too difficult for the BLM or its contractor to change the figures, a statement that reconciles the differences may be appropriate.	WTR	The two figures, 3.2-4 and 4.2-1, are consistent with each other and do not need to be changed. Existing narrative in the Deep Bedrock Carbonate Aquifer section indicates, "Groundwater elevations in the carbonate aquifer at the project area showed no consistent gradient across the site. This is consistent with the conditions shown on the subject figures.

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29.9	Eureka County Board of Commissioners	Project Water-Supply Demand1. The quantity of the water needed for the project is not consistent throughout the DEIS. For example: • Pg ES-5, last paragraph- "Midway estimates that it would use water at an average rate of approximately 400 gallons per minute. This equates to approximately 645.4 acre feet per year ... " • Pg 4-7, last paragraph, 2nd bullet- "Project average water requirement of 750 gpm;" • Pg 4-10, last paragraph, 2nd and 3rd sentences- "Midway estimates that it would use water at an average rate of approximately 400 gpm. This equates to approximately 645.5 afy." Our best guess is that the analysis (pg 4-7) was meant to be conservative by assuming all the leased water would be put to use, but the BLM should disclose the reason why different numbers are used in different sections.	WTR	The three statements of average water use cited in the comment are correct as written. The statements on pages ES-5 and 4-10 that the average water usages would be about 400 gpm or 645.5 afy are correct. The statement on page 4-7 that the average water requirement, for the purpose of the groundwater modeling (750 gpm), is also correct. Groundwater modeling of this type is often conducted conservatively, which in this case includes an artificially high average water consumption rate for the project. The fact that the groundwater model used a conservatively estimated (high) water requirement is not inconsistent with the estimated average water usage described elsewhere in the EIS.
29.10	Eureka County Board of Commissioners	2. Pg ES-6, 2nd full sentence of the first paragraph- "Midway has leased 1200.5 afy instead of the anticipated 645.5 afy to account for potential weather conditions that could increase their usage." Is there a suggestion that there is some kind of future climatic condition that may more than double evaporation? Some justification needs to be provided somewhere in the document to support this statement. Unsupported declarations like this suggest some other, undisclosed reason for the need to secure additional water rights, like a planned expansion they do not want to tie to this DEIS.	WTR	The statement in the Executive Summary that is the subject of the comment also appears in the EIS in the Water Rights subsection of Section 4.2.2 on page 4-10. In that narrative, it is explained that the average water consumption during operations would be 645.5 afy. However, the same narrative indicates that peak water usage of the project would likely occur during the overlap of construction and accumulating initial solution inventory in the heap leach. That narrative indicates that water use, during this period, "is dependent on weather conditions during construction". The reason for this statement is that high temperatures and low humidity encountered during this time would increase evaporation of the water applied to construction sites and the heap leach, temporarily driving up water consumption to over 645.5 afy.

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29.11	Eureka County Board of Commissioners	3. Pg 5-37, 3rd sentence of the first paragraph under "Groundwater"- The paragraph alludes to 1,200 afy of groundwater to be provided by the Project's two wells, which is inconsistent with other citations, above.	WTR	The subject comment is on a statement occurring in the cumulative effects section of the EIS. The subject statement that the water supply wells at the project site would provide 1,200 afy of water is consistent with the explanation of the average and potential peak annual water needs explained on page 4-10 of the EIS. In order to meet the potential peak water demand of the project, the water wells will need to be designed to deliver the peak water requirements of 1,200 afy. This does not change the fact that the average water consumption rate during operations would be about 645.5 afy.
29.12	Eureka County Board of Commissioners	4. It is incumbent on the BLM and its contractor to clean up these inconsistencies, and not rely on outside reviewers to edit their report.	WTR	As indicated in the responses to Comments 29.9 through 29.11, the inconsistencies described by the commenter are, in fact, not inconsistencies and are adequately described in the document itself and in the responses to Comments 29.9 through 29.11.
29.13	Eureka County Board of Commissioners	Project Water Rights 1. Pg ES-6, 4th sentence of the first paragraph- " ... it is unknown if the leased water represents wet rights [water rights that have been put to use] or paper rights [approved permits, but water that is not being put to use] ... " We find it disingenuous that the Project Proponent cannot inform the BLM or the BLM's contractor cannot ascertain whether or not the water rights they intend to apply to their project have been previously put to use and disclose this to the public. As a starting point, the latest crop inventory for Newark Valley clearly shows that a large percentage of the leased water has not been used in the recent past. We provided a summary of water rights (reprinted below) in previous comments to the PDEIS and this information was disregarded. The reason this is important relates to whether or not the Project will result in a new stress to the groundwater system. Granted, the DEIS takes a conservative approach and assumes that the groundwater pumpage by the Project will be a new, added stress to the groundwater system. PLEASE REFER TO THE TABLE	WTR	Page 4-11 of the EIS contains the more detailed explanation of the water rights situation that is summarized on page ES-6. On page 3-23 of the EIS, the water rights situation in the valley is described and all the water rights are listed in Appendix 3A, including the eight water rights that are leased by Midway Gold. The commenter has referenced prior information from the 2011 crop inventory provided by them listing the use of the eight subject water rights in 2011. This tabulation shows four of the water rights being put to use for irrigation in the 2011 crop inventory (wet rights) and four not used (paper rights). These water rights are not equally utilized every year introducing uncertainty into the environmental impact analysis when compared to the No Action (baseline) condition. For example, the crop inventory for 2012 indicates that, of the subject eight water

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				<p>rights five were used and three were not used, for a gain of one wet right for the year compared to 2011. However, the crop inventory for 2006 shows that six of the water rights were used and two were not, so the 2011 and 2012 conditions actually represented a drop in utilization compared to 2006. During all three of these years, one of the water rights was not used in any year. On page 4-11 of the EIS, the statement is made that it is unknown if the subject leased water rights are wet or paper rights, and this is a correct statement in general when the status of the water rights changes as described above. This is not meant to be disingenuous but is intended to disclose the uncertainty in the status of the subject water rights in the baseline condition. In response to this uncertainty, the EIS analysis conservatively assumes that all the subject leased water rights are paper rights because use of these paper rights would place the entire amount as new water used on the basin. Even so, the increased annual usage of groundwater from the basin would still be substantially below the perennial yield for the basin.</p>

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29.14	Eureka County Board of Commissioners	<p>Analysis of Impacts Arising from Water Resource Exploitation by the Project</p> <p>1. Pg 4-7, last paragraph, top of page 4-10- The DEIS alludes to some kind of model analysis of drawdown arising from water exploitation by the Project. The specific analysis is not described, nor are the assumed aquifer properties provided. Interralogic [2012a] presumably provides the supporting information, but why not disclose the specific analytical method, the aquifer properties, etc. such that an interested party could assess the methodology? Eureka County and the general public do not have ready access to this reference. At the very least, the DEIS should provide the supporting information as an appendix.</p>	WTR	<p>The EIS narrative on page 4-7 expressly states that a model was done to predict the long-term impact of the project on the carbonate aquifer. That narrative describes the general assumptions made in running the model and that it encompassed a range of aquifer parameters from high hydraulic conductivity and storage coefficient to low conductivity and storage. The technical report that contains the detailed information on this modeling, Interralogic (2012a), is cited and the data is summarized in the Groundwater Monitoring Plan (Interralogic 2013a), which is included as Appendix 2D in the EIS. It is thought that these descriptions of the groundwater modeling are adequately descriptive for the average reader of the EIS without providing more technical detail from the Interralogic report that most readers who are not groundwater scientists, would not understand. If Appendix 2D is not detailed enough, BLM will provide you with an electronic copy of the technical report as well, if requested.</p>
29.15	Eureka County Board of Commissioners	<p>2. Pg 4-10, 1st full paragraph near the top of the page- Ten feet or more of drawdown due to pumping water by the Project is assumed to represent a potential impact to the groundwater system. Conversely, drawdown less than 10 feet (e.g. 9.9 feet or less) is by default considered not to represent an impact. There needs to be a statement that this 10-foot drawdown criterion is simply a convention adopted by the BLM, but that it has no scientific or rational basis.</p>	WTR	<p>The analysis in the EIS is based upon scientific studies and modeling conducted specifically for the Project (Interralogic 2012a, 2012b, and 2013a). The Groundwater Monitoring Plan (Interralogic 2013a), which includes a summary of the pertinent data from the Baseline Geochemistry Report (Interralogic 2012a) and the Baseline Hydrogeology Report (Interralogic 2012b), is included as Appendix 2D in the EIS. The groundwater narrative in Chapter 4 was reviewed and additional cites to the associated reports were added or revised where appropriate. Use of a 10 foot drawdown is a convention based on model resolution and seasonal water level variation.</p>

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29.16	Eureka County Board of Commissioners	3. No map showing the 10-foot drawdown contour was provided in the document such the reader is required to conjure up an image. In order to fully disclose the range of predicted drawdown impacts the BLM must provide a map showing the maximum and minimum extent of the 10-foot contour based on the range of assumptions used in the analysis.	WTR	Narrative has been updated to describe "...The maximum extent of the drawdown occurred within the boundary of the project area for the base, high and low conductivity cases. For the low conductivity and low storage case the results predicted that the maximum extent of the 10-foot aquifer drawdown contour would be 1,136 feet in radius from the well, which would be within the project area boundary." The image of the boundary of the project area is shown on many figures in the EIS including all the figures in Section 3.2, Water Resources. It is thought that these descriptions of the drawdown impacts are adequately descriptive for the average reader. BLM intends to provide copies of certain technical reports that support the EIS in a distribution CD that will be provided upon request to interested parties. A copy of this CD will be provided to the commenter.
29.17	Eureka County Board of Commissioners	Cumulative Water Resource Impacts 1. Pg 5-36, 3rd full paragraph- "The largest water use in the CESA is irrigation, which consumes over 27,000 afy and is 150 percent of perennial yield for the Newark Valley." This statement is an example of how changes to in earlier chapters of the DEIS did not flow through the document.	WTR	The subject narrative on page 5-36 has been changed to: "The largest permitted water use in the CESA is irrigation, which totals over 27,000 afy and is 150 percent of the perennial yield for the Newark Valley. However, the actual amount of water used for irrigation is less than the permitted amount, being approximately 9,300 afy in 2011 and 2012, which is well below the perennial yield for the basin (18,000 afy)."

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29.18	Eureka County Board of Commissioners	2. Pg 5-37, First sentence of the first paragraph under "Groundwater"; "Potential cumulative impacts to groundwater are negligible"- This opinion is not supported by analysis. At the very least, we would expect some kind of tabulation of the increased groundwater withdrawals that might be expected from the various mining projects "in the pipeline" for the Newark Valley Regional Flow System.	WTR	The reasons why the cumulative impacts from the proposed pumping for the project are considered to be negligible are described in the narrative. Assuming that all the leased water rights are "paper rights" and would add to all other water utilization in the basin, the increase in water usage from the Proposed Action would be 1,200 afy, which is 6.7 percent of the basin perennial yield. As described on page 3-23, the total usage of groundwater in the basin for 2011 was 10,745 afy, which is about 60 percent of the perennial yield. So, even in all the subject leased water rights were "paper" rights, there would be essentially negligible impacts on use of groundwater in the basin because there would still be a surplus of one-third of the perennial yield available. However, the subject language on page 5-37 also indicates the water rights to be used in the Proposed Action are leased from an existing water right owner so the subject water rights would not be used by the prior owner but would be used by Midway Gold for the duration of the project. Thus, there would be no addition to the permitted water rights in the basin. Also, because the leased water rights are not all "paper" rights, and half or more of them have actually been used for irrigation in the past, there will actually be negligible additional usage of groundwater in the basin from the Proposed Action.
29.19	Eureka County Board of Commissioners	3. Pg 5-37, 3rd sentence of the first paragraph under "Groundwater"; "These wells would provide approximately 1,200 afy of groundwater"- As noted previously, this amount is inconsistent with other citations of the Project's water supply demand (vs. 645.5 afy).	WTR	See response to Comment 29.11.
29.20	Eureka County Board of Commissioners	Air Quality 1. We understand the BLM is checking with the BLM State Office on our previous comments regarding air quality. We look forward to how they are addressed in the FEIS. We repeat them here to ensure they are considered.	AIR	Statement noted. The input from the BLM State Office was received and has been utilized in the FEIS.

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29.21	Eureka County Board of Commissioners	2. There has been no air quality data collected at the Project. This calls into question the BLM's process and the conclusions regarding air quality where local data is needed. It is especially of concern when local data could inform the federal decision making process to protect the health and safety of local affected communities. A remedy to this shortcoming is for BLM to work with NDEP to require installation of local monitoring stations now and collect local and on-site baseline data until the mine would be operable.	AIR	The EPA does not require continued air monitoring if the three-year average monitored concentrations fall below 60% of the NAAQS. NDEP has discontinued ambient monitoring in much of Nevada due to this EPA guidance. NDEP has compiled the historical data from discontinued monitoring sites and advises applicants in rural areas of Nevada to use background concentrations from the Great Basin National Park monitoring station. In addition, gaseous pollutants in rural areas are expected to be negligible with respect to the NAAQS. Modeled emissions from the Proposed Action and alternatives do not show a need for additional ambient air monitoring. NDEP will install and maintain monitoring stations in areas that have shown a need for such, in this case modeling has shown that there will not be a sufficient need for additional monitoring. Statements have been added to the FEIS to clarify this.
29.22	Eureka County Board of Commissioners	3. The receptors in the Jarbidge Wilderness Area and Great Basin National Park are more than 50 kilometers from the proposed facility. AERMOD is not recommended by EPA for distances greater than 50 kilometers. The CALPUFF model is currently recommended by EPA for these more distant receptors.	AIR	The AERMOD air dispersion modeling software uses prevailing winds and emissions from the Proposed Action and alternatives to determine the size and direction of impacts on a near-field basis. If concentrations from the AERMOD modeling are sufficiently large and located in the direction of sensitive areas, a far-field analysis will typically be conducted using the CALPUFF model. Since the site-specific impacts were located to the east of the site and under the NAAQS concentration limits, CALPUFF was not warranted for major impacts at the Great Basin National Park (110 kilometers distant) nor the Jarbidge Wilderness Area (250 kilometers distant).

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29.23	Eureka County Board of Commissioners	Grazing 1. While BLM's response to our PDEIS comments notes that AUMs will likely not be reduced based on forage analysis, the DEIS still speaks that AUMs will be reduced. Our concern is partially based on the fact that if BLM is going to keep the analysis of reduced AUMs in the EIS, then our comments still apply. We want the socioeconomic impacts of the reduced AUMs analyzed if the AUM reduction language stays in the EIS (even if the AUMs do not get reduced "on the ground"). We repeat our previous comments here to ensure they are considered.	RNG	Explanatory text has been added to the EIS.
29.24	Eureka County Board of Commissioners	2. There should be cross-cutting analyses where the reduction in AUMs, even if temporary, is quantified and disclosed in the socioeconomics section. For example, consider something similar to the following analysis: Of all the agricultural commodity sales in Eureka County, cattle/calves and sheep/lambs historically average 40% of the sales with most of the remainder made up of export hay. According to the 2007 Census of Agriculture, there was a livestock inventory in Eureka County of nearly 25,000 head and \$25,015,000 worth of agriculture commodity sales. Since livestock accounts for 40 percent of agriculture commodity sales, livestock production is responsible for generating \$10,000,000 worth of product sales in Eureka County in 2007. The direct and induced benefits of the livestock industry in Eureka County can be determined based upon information contained in the University of Nevada Report: Reno Technical Report UCED 2005/06-14 Updated Economic Linkages in the Economy of Eureka County. The livestock sector in Eureka County has a final demand multiplier of 2.0283. In short this means that for every \$1 generated by the sector Eureka County's economy will benefit \$2.02 of total revenue. The high final demand multiplier suggests strong economic linkages of the livestock sector to other sectors of the county's economy. Income and employment multipliers are also of importance. The livestock sector has an income multiplier of 1.6812 and an employment multiplier of 1.4439. Thus, for every \$1 generated by livestock production, total county household income increases by \$1.68 and for every job added by the livestock sector, total employment in Eureka County increases by 1.44 employees. In 1999 funds were appropriated through the Nevada Legislature to create a Nevada Public Land Grazing Database and Economic Analysis. In 2000, the Nevada State Department of Agriculture asked the Nevada Association of Counties to assist in fulfilling this mandate. Resource Concepts, Inc. was contracted to help complete the database and analysis. The product of this effort is the report, Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada (Resource Concepts, Inc. March 26, 2001). Table 3 of the Report (p. 48) summarizes the economic impacts of 1 AUM of grazing in Nevada as follows: Basically, for every AUM lost (or gained), the overall impact to the livestock producer himself in one year equals \$29.40. The total economic impacts, which include the industry impacts and value added impacts, totaled to \$53.40 per AUM (\$29.40 direct and \$24.00 in indirect and induced impacts). The	RNG	Explanatory text has been added to the EIS.

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		figures above do not take into account inflationary changes since 1999. Based on data reported from the Bureau of Labor Statistics for each year since 1999 through 2010, the average rate over the past 12 years is approximately 2.5% per year (actually 2.46%). For a more robust estimate, removing the volatile years with the highest rate (2008 at 3.85%) and the lowest rate (2009 with -0.34%) gives an adjusted average inflation rate of 2.6% which is more in line with the average over the past 20 years. Therefore applying a rate of 2.6% each year since 1999 gives a 2010 value of one AUM to the producer at \$39.24 and the entire economy at \$71.28. Again, we do support the Pan Project. We look forward with working with BLM and the Project Proponent to address our comments and move forward with the best Project possible.		
30.1	Karl Lee	Attn: Miles Kreidler My name is Karl Lee and am a long time resident of Ely of about thirty years and I would like to submit my comment on Midway Gold's Pan Mine. I think this mine will have a very low environmental impact and I don't see anything that gives me cause for concern. I feel there are very few negatives but there are a lot of positives for having this mine in our area.	GEN	Statement noted.
30.2	Karl Lee	The jobs and revenue this mine will bring is much needed for the future of this part of the state. Our county, city, and schools will all benefit along with the local businesses. Please approve this mine I think it is a win win for us all. Thanks.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
31.1	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	Original National Park Service submittal. The revised submittal 144 has been responded to. Re: DEC 13-0063 Proposed Pan Mine Project. Thank you for the opportunity to review the Draft Environmental Impact Statement for the proposed Pan Mine which would be located on BLM-administered lands in White Pine County, Nevada. Midway Gold, U.S., Incorporated proposes an open-pit gold mine about 50 miles west of Ely, which would consist of two primary open pits, four satellite pits, one heap leach pad and two rock disposal areas. The total surface disturbance would be approximately 3,204 acres. The environmental impact analysis is based on a proposed 13 year mining period, with associated construction, closure, reclamation and post-closure monitoring periods extending the project life to approximately 25 years. No comments were received from any other National Park Service office, nor any other agency. Our comments and concerns are categorized as follows:	GEN	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.
31.2	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	Cultural Resources A reasonable Area of Potential Effects was defined that includes both direct and indirect effects associated with the Pan Mine Project plan. Appropriate background research and "Class III cultural resource inventories" were conducted within the Proposed Action area but do not include the transmission line corridor of the SW line alternative and the unidentified reroute area of the Lincoln Highway. Additional cultural resource surveys should be completed in accordance with the executed Programmatic Agreement. We recommend that the potential for an archaeological district be considered for the NRHP eligible sites, along with	CR	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.

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		<p>any non-eligible sites that may contribute to the district. As noted below, we disagree with the statement that “no additional direct impacts to NRHP-eligible cultural resources... would be anticipated after construction [besides the reroute of the NRHP-eligible portion of the Lincoln Highway].” Ground disturbing activities associated with the project have the potential to disturb, damage, and/or destroy currently unknown archaeological resources.</p> <p>Is it necessary to permanently reroute any portion of the Lincoln Highway away from a temporary project site? From a cultural resources perspective, why would a permanent reroute of the highway constitute a mitigation of impact? Can the highway instead be reestablished upon conclusion of the project, with appropriate signage and identification of interpretation of the reconstruction along the original route? Did the preparing principle investigator for archaeological identification studies meet the criteria noted in DOI Historic Preservation Professional Qualification Standards? Was that individual also involved in preparing the proposed mitigation impact plan? The Draft EIS (p.3-134) indicates no Traditional Cultural Properties (TCP) have been identified in previous studies but that doesn't mean there are not any such properties, only there are none in a database. The federal agency must be proactive and determine, by consulting directly with tribes, whether the lands contain such resources or areas of concern. This is also true for other cultural resources. If the consultants only reviewed what is in the SHPO database, this reports what has been completed in the past. How up to date are these records? A recent, up to date inventory completed by professionals who meet the Secretary of the Interior's Standards for professional qualifications should be cited, not just the existing record. The Draft EIS (p.3-140 §3.12.2) mentions that data for TCPs relied on the BLM tribal liaison's knowledge of places and resources. Is this information up to date? Liaison should consult directly with the tribe and not just count on what he/she knows at the present time. A greater effort to consult with tribes should be encouraged to ascertain whether or not there are sacred or other important sites to the tribe. The Draft EIS (p.3-141) indicates that “to date no TCPs or EO 13007 sites have been identified within the project area”. Again, has BLM conducted research or survey work to determine whether or not such sites exist or merely reviewed an existing database? §110 of the NHPA requires federal agencies to conduct research proactively and identify, evaluate and nominate such properties. Has work on TCPs been completed by the federal agency or is the agency waiting for others to record information?</p>		

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31.3	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	Tribal Coordination Local Tribes were sent a notification of project plans. A meeting was conducted between the Senior Research Economist for the Bureau of Economic and Business Research at the University of Utah and a Tribal Chairman of the Duckwater Shoshone Tribe. Has additional contact been attempted/made with the local Tribes? Follow-up phone calls with the Tribes are recommended. It is also recommended that a tribal liaison (with a background in cultural resource management and Tribal consultation) be designated to speak with Tribal representatives regarding matters arising from the §106 process. Additionally, we recommend consultation with Tribes be performed on a government-to-government basis, in accordance with NATHPO's Tribal Consultation: Best Practices in Historic Preservation (http://www.nathpo.org/PDF/Tribal_Consultation.pdf).	NAC	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.
31.4	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	Great Basin National Heritage Area In 2006 the national significance of this superlative area was recognized by Congressional designation. The Area of Potential Effect (APE) for this mining proposal is entirely within the Great Basin National Heritage Area. The proposed undertaking could negatively impact heritage resources, including natural and cultural resources, in and around the APE and consequently conflict with the fundamental values of the National Heritage Area. What consultation has taken place with the Great Basin National Heritage Partnership? Was the integrity and value of the National Heritage Area considered in identifying and analyzing the impacts to resources listed in the Draft EIS? The Final Management Plan for the Great Basin Heritage Area was recommended to the Director, National Park Service during February 2013. The March 2012 Draft Plan was prepared in consultation with BLM and other partners, and is available at (http://www.greatbasinheritage.org/images/Draft%20Management%20Plan%20&%20EA%20GBNHA%206-1-11.pdf). It is suggested that preparation of the Final EIS be undertaken in consultation with the Great Basin Partnership, which also could aid in refining mitigation strategies for the cultural and visual resources (among others) being impacted by this proposal.	CR	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.

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31.5	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	<p>Lincoln Highway</p> <p>The conclusion in the Executive Summary (p.ES-15) that the project proposal will have minor to moderate and long term impacts to the Lincoln Highway is not accurate. There will be permanent adverse effects to a National Register listed property. If the section is relocated, it is a precedent which threatens the long term health and welfare of this unique resource. Thus the effect of proposed relocation of the section of National Register listed Lincoln Highway within the APE is a concern. This is a much-loved national historic cross-country highway, and travelers on this section expect this one-of-a-kind resource to be preserved for future generations. The relocation of this section reflects a nibbling away at the integrity of the resource. Perhaps the mine should not extend to the road bed at all, and be reduced in size, so the nationally significant resource is not adversely impacted. The landscape traversed by the Lincoln Highway is characterized as having wide open vistas, long and lonely roads crossing these open ranges, with little to no sign of human intervention. The Great Basin NHA describes the landscape as iconically Western...big unobstructed views and big skies. Building a new road and transmission line coming directly off a NR listed cultural resource road corridor is a visually intrusive act upon the landscape. In preparing the Final EIS, we recommend including photographs showing what the landscape in and around the new road and transmission lines will look like before and after installation of these modern intrusions. Preparation of photo-simulations in consultation with the Great Basin NHA ascertain key viewpoints along public right-of-ways would aid in assessing how visibly intrusive the new construction will or will not be. The Draft EIS (p. 3-152: re VRM class III lands) indicates that moderate changes that are not visible to the casual observer may be allowed. However, a new road and transmission line and associated facility development would be very noticeable to the casual observer who is largely expecting to see an open, unobstructed, Western landscape of basin and range, and not what is described above, as they travel through the historic Lincoln Highway corridor.</p>	CR	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.

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31.6	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	Dark Night Skies We disagree with the conclusion in Chapter 4 that states: "Illumination resulting from use of the proposed project lights would have a negligible impact on the night sky, because there are very few existing light sources in the area and the ambient light level is very low." The project is proposed in a largely uninhabited area with very few existing light sources and will have a substantial impact on the "the largest contiguous region of dark skies in the United States" (p. 108 in the Great Basin National Heritage Area Management Plan). Since the ambient light level is very low, any lights used for the proposed project will be introduced to an otherwise dark background and create high contrast, making light sources readily visible. Consequently, the ability to view astral and stellar features will be lost. The Visual Resources in Chapters 3 and 4 of the EIS should include a thorough description of the existing night sky condition and the foreseeable environmental consequences of the proposed action on the nationally recognized area. The minimum amount of light that will be needed for night operations should also be identified and described. How unmitigated night lighting for project activities will affect plants and resident and migratory birds and animals should be assessed.	VR	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.
31.7	Craig Ackerman for Christine S Lehnertz, Regional Director Dept of Interior National Park Service	Thank you for your consideration of these comments and suggestions. For additional information concerning the Great Basin Heritage Area and dark night skies please contact Linda Stonier, Heritage Areas Co-Coordinator, Rivers, Trails, Conservation Assistance, Pacific West Region (415) 623-2322; for information concerning cultural resources and Tribal coordination please contact Mark Rudo, Regional Archeologist, Pacific West Region (415) 263-2361; for information about Lincoln Highway and visual resource impacts, please contact Gretchen Luxenberg, Heritage Areas Co-Coordinator, Rivers, Trails, Conservation Assistance, Pacific West Region (206) 220-4138. Thank you for the opportunity to review the Draft EIS.	GEN	Original National Park Service submittal. The revised submittal comment letter number 144 has been responded to.
32.1	Eric Williams	Dear Mr. Kreidler: Thank you for the opportunity to provide comments on Midway Gold's Pan Mine.	GEN	Statement noted.
32.2	Eric Williams	As a current contractor to Midway, we represent the fact that mines in the U.S. bring strong economic benefits both locally and across the country.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
32.3	Eric Williams	A major reason we do work for Midway is that CEO Ken Brunk and the entire company are committed to doing things right – right by the environment, right by the communities they operate in, and right by their employees and shareholders. At the BLM your major concern is the resources in and around the mines footprint, and I'm impressed with the steps the company has taken to protect those. Further, the BLM's proposed modification of the waste rock area enhances Midway's strong plan.	POS, SUP- WRDA	Statement noted.

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32.4	Eric Williams	I'm not in favor, however, of the circuitous alternative route suggested for the power line. It simply doesn't make sense to add miles of wires and poles and disturb additional acreage for some perceived and illusory gain. It does little more than substantially raise costs while bringing essentially no benefits.	OPP-SWA	Statement noted.
32.5	Eric Williams	The Pan Mine is an excellent project for multiple reasons. First, there are virtually no water issues; the evaporation at Pan is substantially greater than the precipitation, and the bottom of the pit will be approximately 300 feet from the water table. Because there's so little water, the local region has little wildlife.	POS	Statement noted.
32.6	Eric Williams	Moreover, Midway has demonstrated a commitment to taking extra steps to protect sage-grouse and their habitat.	POS	Statement noted.
32.7	Eric Williams	And importantly, the project will provide family wage jobs for 150 people, primarily in White Pine and Eureka Counties, along with attendant tax revenues and sales of goods and services. While not a particularly large mine, Pan provides great opportunity to bring substantial socio-economic benefit with minimal accompanying disruption. Please continue progressing toward a favorable Record of Decision so more Nevada families can have the comfort of a good-paying job and additional tax revenues for schools and other services.	POS, SOC	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
33	Brian Morris, VP of Exploration	Dear Mr. Miles Kreidler, I am writing this email in support of Midway's Pan Mine EIS approval. Early in my career I worked at Bald Mountain and lived at the mine's man camp located near the Strawberry mining district. I travelled in to Eureka about twice a week for groceries and also just to get out of the camp for the day. In the early nineties before the discovery of Ruby Hill, the town was depressed, run down and little employment in the area. Years later I returned to Eureka after the Ruby Hill went into production. What an incredible positive change I witnessed with the town. Business were thriving, school full with kids and the face lifts I saw on the old buildings. It was obvious to me that mining for Eureka was a positive experience. With that being said, I am requesting that you seriously consider approving Midway's Pan Mine EIS. Eureka and other surrounding communities need the continued steady stream of jobs as well as the State needing the additional tax revenue that the Pan Mine will generate from their gold production. Rural Nevada needs these jobs. Thank you for your consideration.	POS, SOC	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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34	Jennifer Lee	<p>Attn: Miles Kreidler My name is Jennifer Lee, have resided in Ely for the last twenty years and was also raised here. In short, I consider Ely home and value the clean air and beautiful mountain vistas residents enjoy here. I also value jobs being available in the area from environmentally responsible companies, such as MIDWAY GOLD. Midway's Pan Mine project demonstrates their commitment to wildlife areas as well as the communities of Ely and Eureka, Nevada; case in point, Midway supports the BLM's Waste Rock Disposal Site Design Alternative because it will disturb fewer acres of potential sage-grouse habitat. Further, the Pan Mine's pit will be 300 feet above groundwater; there is no surface water at the mine site; little sulfide material; and the net evaporation (50") versus precipitation ratio (11") is ideal, thus eliminating the need for the mine to dewater. Further, Midway Gold is a good member of the community! They recently sponsored the musical The Wizard of Oz at White Pine High School - all of my grown daughters participated in the drama program there - and they are always contributing to youth athletic programs. Please approve this mine. In 2010, my husband and brother had to close a family business that had been open forty years; if Pan Mine had been operational, E-Lee Ford Yamaha Suzuki could very well still be open.</p>	POS	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>
35	Michael Cole, Senior Mining Engineer, Midway Gold	<p>Dear Mr. Kreidler; I would like to share with you my support for Midway Gold's Pan Mine Project. I am a fellow mining engineer with seven years of experience with feasibility studies for projects similar to the Pan Mine Project. As I started to learn about Midway and the project, and reading through the reports and meeting employees of Midway, I quickly became impressed with the quality of the work and great care put into these studies. I was also impressed by Midway's commitment to the environment, ecosystems and communities of Nevada. So impressed, that I joined the Midway team in April, and will soon move to Ely to be part of the Pan Mine Project. The Pan Mine Project will greatly impact the lives of Nevadans of Ely and Eureka, and other surrounding communities for the better. During the one-year construction phase, 160 jobs will be created for citizens in the local region. Once in operation, the mine will sustain 150 well-paid jobs. This is great news for communities like Ely. In addition, numerous indirect jobs within the communities will follow support mining activities, miners' families, local government, and beyond. Midway has demonstrated their commitment to the community by supporting local school sports teams and local organizations. Midway has also demonstrated their commitment to the environment and ecosystems of Nevada, especially by committing to fund 1.5 million dollars for an independent study of sage-grouse. I do feel the alternative power line route poses more risks to the local environment and ecosystems. The greater risk to several golden eagle nests and burrowing owl territories, along with a larger footprint of disturbance to vegetation and water resources along the alternative route do not outweigh the benefits to sage-grouse along the shorter power line route. As a new</p>	POS, OPP-SWA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>

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		member of the Midway team, I look forward to working with yourself and the rest of the team at the BLM to ensure that the Pan Mine is a role-model for responsible mining in Nevada. Kind Regards.		
36	David Campbell, General Manager Thomas Petroleum	To Whom It may Concern, Thomas Petroleum is a fuel and lubricant supplier to many of the Nevada Mines. Based on our evaluation of the Pan Project this has great potential to help out the neighboring communities by providing good high paying jobs. We also looked at the access road options and think that the shorter seven mile route is key to the operations success and Safety. The alternate route that exceeds 30 miles will cause numerous transportation concerns such as safety, wear on vehicles, additional cost to all miners and vendors supporting the project. Thomas Petroleum is committed to safe and environmentally friendly mining operations. This is good for the economy of Nevada and the United States as a whole.	POS	Statement noted. The Southwest Access Road is not an action alternative evaluated in the EIS.
37	Philip Ritz, CH Spencer Company	BLM, I approve of this project, from attending their meetings I see they have done the work involved in protecting habitat, as well as resources and seem to be very conscience of their surrounding neighbors by keeping them informed of the plans and any impacts there might be. I like it when companies do the required work and seem to go out of their way to respond to concerns people might have regarding the project. Look forward to a new mine in the area, I have been in Elko Nevada since 1985, I have a family, we hunt, fish, camp as much as possible and with new projects that are being done as professional as this one I have no concerns that it will affect my being able to do this with my Family or anyone else's for that matter. Thank you.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
38	Robert B. Valceschini, P.E.	To whom it may concern, I am a graduate of the Mackay School of Mines and the owner of Applied Soil Water Technologies, LLC (ASW) a geotechnical/geoenvironmental engineering firm based in Sparks Nevada. ASW currently maintains 12 full time employees along with two college (Mackay) interns in our Nevada office. I am writing to express my enthusiastic support for Midway Gold's Pan Project. With regard to alternatives, I support the Waste Rock Disposal Site Design Alternative and I support the most direct access road and power line route. Throughout this economic downturn the majority of our revenue is derived from mining projects. Therefore at ASW alone 12 Nevada families and two University of Nevada, Reno college interns are being supported primarily through mining. Additionally, ASW was awarded the Small Company Capital Investment Award for 2012 from the Economic Development Authority of Western Nevada. This award was based on ASW's economic investment back into our local community. The funds for this investment were derived primarily through revenue generated from mining projects. With regard to respect for the environment and wildlife habitat; I have known on a personal and professional basis key personnel for Midway Gold's Nevada operation for over seven years. During that time we worked together on numerous operational and reclamation	POS, SUP-PA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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		projects on several properties. I can personally say that their respect and concern for the environment and wildlife habitat are beyond reproach, that the Pan Project will be implemented with minimal impacts, and that on closure, the habitat will be left in as good, if not better, condition than prior to mining. If you have any questions, please do not hesitate to contact me.		
39	Ed Jucevic	My concern: I strongly urge you to expedite all permitting of the Midway Gold's Pan Project in White Pine County, Nevada. Although there are many reasons the project should go into production (jobs, return on investment, taxes to the County, State and Federal Government) many others will undoubtedly emphasize them. I would like to focus on the most important reason any mining project exists: To produce the mineral resources society needs to survive. This country and the world need the gold that will be produced at the Pan mine. As a past resident of White Pine County, a long time resident of Nevada and an individual who mined just east of the Pan Project (White Pine Range) a half century ago I can attest to significant firsthand experience in the area. Since retiring a few years ago (I am 76 years old), I have been studying moral philosophy, banking, monetary policy, and finance. The Country will soon need gold as our fiat currency will become almost worthless, as all past fiat currencies have.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
40	David Szumigala	Dear Mr. Kriedler I am writing to support Midway Gold's Pan Project as it progresses through EIS planning. Midway, with BLM consultation, has done a good job of developing a plan that will employ 150-160 people while protecting the surrounding environment, including water and wildlife. The local economy of Ely and White Pine County will be positively impacted. I graduated from the University of Nevada Reno with a B.S. in geological engineering in 1981. I spent summer geology field camp and several years of mineral exploration in the general area of the Pan Project. The country is beautiful and appealing. I believe a properly engineered mine is an acceptable use of this part of Nevada. I support the BLM's Waste Rock Disposal Site Design Alternative. It seems a win-win alternative: overall lower costs to the company and decreased land disturbance with less impact to sage-grouse habitat. I do not support the BLM proposed Southwest Power Line alternative. Midway's proposed power line is 8.5 miles long, while the proposed Alternative would be 32 miles long, unduly increasing land disturbance and costs. Any benefit to sage-grouse is more than offset by the negative impacts to other birds, including burrowing owls and golden eagles, vegetation and water resources. Thank you for considering my comments.	POS, SUP- WRDA, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The impacts to wildlife and hydrology mentioned in the comment are included in the EIS.

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41	Chris Moltz, E.I Stanka Consulting, LTD	To Whom It May Concern, Greetings. My name is Christopher Moltz of Stanka Consulting, LTD. I am writing this e-mail on behalf of my boss, Michael Stanka, PE, who attended the presentation by Midway Gold this past Thursday at John Ascuaga's Nugget in Sparks, Nevada. Stanka Consulting, LTD is a professional engineering company in the State of Nevada. Stanka Consulting, LTD does not have any past, planned, or future contracts with Midway Gold. Stanka Consulting, LTD fully supports the Pan Project in White Pine County, Nevada because it will bring growth, economic stability, and new jobs to the State of Nevada. Based on review of the project, the Pan Project appears to be environmentally conscious to the ecosystems and wildlife that is native to Nevada. Stanka Consulting, LTD recommends the "Waste Rock Disposal Site Design Alternative" to reduce potential impact on sage-grouse habitat; however, Stanka Consulting, LTD, does not recommend that it is necessary for Midway Gold build an additional 50 mile pipeline to alter a path for sage-grouse mitigation. Overall, Stanka Consulting, LTD thinks that with these suggestions, the Midway Gold Pan Project will be valuable in strengthening Nevada as a whole. I hope you take this into account went evaluating the project.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. A 50-mile pipeline is not part of any action alternative considered in the EIS.
42	John F. Kotek	Dear Mr. Kreidler: I am writing to voice my support for Midway Gold's proposed Pan Mine. The mine will bring much-needed jobs and other benefits to White Pine and Eureka counties, and it appears that the mining and reclamation plan will be more than adequately protective of human health and the environment. In particular, I'd like to offer my support for the BLM's Waste Rock Disposal Site Design Alternative. I'm pleased to know that the Alternative will result in less land disturbance, affect less sage-grouse habitat, and reduce construction and reclamation costs. I do have a concern with the proposed Southwest Power Line Alternative, in that it appears this alternative could result in greater overall impacts when factoring in the overall amount of land disturbance, the potential for river bank erosion, and impacts to other species (such as burrowing owls and golden eagles). Thank you for your efforts to develop a thorough evaluation of the potential environmental impacts of the Pan Mine proposal. I urge you to move quickly to issue a final EIS and a positive Record of Decision. With best regards.	POS, SUP- WRDA, OPP- SWA, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The impacts to wildlife and hydrology mentioned in the comment are included in the EIS.
43	Dan Neuffer, P.E. Senior Consultant Civil/Geotechnic al Engineering	Dear Mr. Kreidler, I had the opportunity to work with Midway Gold on the Pan Project over the course of two years. In our work together, I found the Midway Gold leadership to be proactive and committed to environmental stewardship. I believe the Project will bring significant economic benefits to rural Nevada, especially to residents of Eureka and White Pine counties. Feel free to contact me with any questions.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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44	William Crowl, VP Mining Sector Gustavson Assoc	Dear Mr. Kreidler: As a long-time member of the international and North American mining community, I am proud to be able to write to you in support of the responsible development of Midway Gold's Pan Project. I have worked on and off in the Ely, NV area for years. The development of the Pan Project will bring much needed jobs to the area, providing additional tax revenue and local business revenue. The company I work for, Gustavson Associates, LLC, has been involved with the study and planning of the Pan Project for several years. Working together with Midway Gold staff, we have helped design a mine, facilities and infrastructure that will be a good example of how to build mine correctly, in compliance with government guidelines and regulations. On my recent visit to the Project site, I was made aware of the measures that Midway is using in terms of the sage-grouse habitats and mitigation of potential impacts. I am sure that Midway will adhere to the regulations as written or amended and will be pro-active in reasonable approaches to the sage-grouse issues. I understand the BLM has included an alternative waste rock disposal site in the DEIS, and that Midway has expressed their support for the alternative proposal. Midway's support is an indication of their commitment to appropriate development of Pan. Please feel free to contact me anytime. Again, I am in full support of the development of the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
45.1	William R. Wilson	1. Socioeconomics. Midway Gold has been a strong partner of the Ely community during its years of development and planning and is expected to continue in that role. It should be mentioned in section 5.17 that the addition of a mine with known life of a minimum of 13 years coupled with continuous expansions at the Bald Mountain and Robinson mines would strongly stimulate the desire for added permanent housing, shopping, and social activities for new as well as current families in the affected communities.	SOC	Section 5.17.6 addresses this as it states "the proposed action would contribute to cumulative effects on socioeconomics by increasing employment, income, and the demand for housing, schools, law enforcement, fire protection, and other services and infrastructure."
45.2	William R. Wilson	2. Waste Rock Disposal Site Design Alternative: 2.4.1. This makes good sense since it mitigates visual resource concerns about visibility from US 50 and reduces potential conflicts with sage-grouse. Apparently, it also reduces ground disturbance by 79 acres.	SUP- WRDA	Statement noted. The impacts to wildlife and visual resources mentioned in the comment are included in the EIS.
45.3	William R. Wilson	3. Southwest Power Line Alternative: 2.4.2. This makes no sense.	OPP-SWA	Statement noted.
45.4	William R. Wilson	4. Cultural. Page 3-125, 4th paragraph, end of 4th line should probably read "played out" instead of "panned out."	CR	The terminology used by the author cited in the subject narrative is used in the EIS.

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45.5	William R. Wilson	4.11.2.1 Mitigation. Is it possible to share some of the information and documentation with locally based cultural and historical organizations such as the White Pine Public Museum, Lincoln Highway Association, Great Basin National Heritage Partnerships, and others?	CR, M&M	Cultural resource locations are generally restricted by law in order to protect the resources. Depending on the type, sensitivity, and general public knowledge of the resource, some information could be shared, especially if it were part of public outreach/interpretive program.
45.6	William R. Wilson	5.13.6 Cumulative Effects, last sentence. While physical disturbance to cultural resources would not occur under the No Action Alternative, the cultural field studies and interpretations discussed in 3.11.3 have already been completed on behalf of the proposed project. Did these not “expand the regional database and knowledge of prehistoric and historic contexts” (line 5 of paragraph 2)? So, isn’t this a favorable impact even under the No Action alternative?	CR, CE	It is correct that the cultural resource inventories and evaluations expand the regional database and contribute to knowledge of prehistoric and historic context. Additional text has been added to Section 5.13.6.
46	Marion J. Hanson	I have lived in or near mining communities in Utah most of my adult life, and in Ely for nearly seven years. Upon evaluation of the proposed Pan Mine project and its environmental and community impact, I have never seen a proposed mining project so carefully tailored to the needs of balancing the environment to those of a community in desperate need of economic development. I am satisfied that Midway Gold has gone above and beyond anyone’s expectations to accommodate the desire to maintain the natural beauty and purity of life so long associated with White Pine County while allowing for the development of its natural resources in a manner which will satisfy present and future naturalists. Moreover, I have found their willingness to contribute to the welfare of the community by their sponsorship of so many and varied projects, that their future operations will only see a further and even deeper commitment to partner with our leading community organizations. As a teacher at White Pine High School, I am especially pleased with Midway’s contribution to the technology center at the school, having already seen my students grow through access to the resources it provides. It is therefore without hesitation that I wholeheartedly endorse Midway Gold’s proposed Pan Mine.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
47	James G. Wilbourn	Dear Sir: I would like to submit my comments in favor of the Pan Project in Nevada. I believe this project will be of enormous benefit to the State of Nevada and its citizens. It will provide many well paying jobs and much new revenue to the local economy. In a state as sparsely populated as Nevada, the jobs created and the revenue that will flow to the many related businesses will have a very significant impact on the economic wellbeing the area. It is exactly the kind of business activity that is uniquely suited to this part of the state and that its residents desire. I believe that the Pan Project, while providing tremendous economic opportunity and benefits, can be accomplished with minimum impact on the environment. Whatever the environmental impact or concerns are, I don’t think they come close to outweighing the socioeconomic benefits of the project to	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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		the citizens of Nevada. Midway Gold supports research to determine any real and significant impact of the project to the habitat of the sage-grouse and supports the BLM's alternative waste rock disposal site to minimize any potential impact. This is exactly the kind of response to environmental concerns the BLM should expect and support. It should provide significant justification for a favorable Environmental impact Statement and a permit approval for the project..		
48	Jim Wilbourn	Dear Mr. Kreidler, I am writing to express my support for Midway Gold's Pan Project and comment with respect to the Draft Environmental Impact Statement. I believe that this project will greatly benefit the economy of the immediate surrounding areas and the greater State of Nevada. Midway is committed to supporting the White Pine County community and offering economic opportunities to the residents of Nevada. I believe the socioeconomic impact to the local community and state far outweigh the environmental impacts of the project. Further, Midway is supporting sage-grouse research to lessen any such impacts. Midway is also designing its operation so as to minimize environmental impacts, as demonstrated by the alternative waste rock disposal site. Please consider this correspondence as my indication of strong support for the project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
49	Brion Theriault, Consulting Geologist	I am submitting the following comments concerning the Midway Gold Pan Draft EIS:- The Pan project will provide important high-paying jobs for the local community, including the Duckwater Indian Reservation. Because of the remoteness of the Eastern Nevada area where the project is located, mining is one of the few industries which can realistically provide employment offering wages which will support families, as well as good benefits. As such, I fully support the project. My understanding is that the Waste Rock Disposal Site Design Alternative will result in reduced disturbance and impact on sage-grouse. I support adoption of this Alternative. I believe that the Southwest Power Line Alternative may present significant safety risks to workers traveling to and from the mine. This route would be the main access road to the mine. Most of the mine workers will probably live in Ely. By lengthening the commute time significantly, the Alternative would increase the risk of death or serious injury due to traffic accidents caused by fatigue. Increasing the commute distance will also encourage speeding. In addition, the Southwest Power Line Alternative will cause the main access road to be built over steep terrain in places. This will lead to traffic congestion as heavy equipment is forced to travel slowly over the steep parts of the road. This will in turn lead to increased risk of serious traffic accidents as drivers attempt to pass such slow moving equipment. Traversing steep roads in winter will also increase the danger of accidents. While it is important that impacts to the sage-grouse population be minimized and eliminated altogether if possible, I recommend that other solutions to mitigate these impacts be considered because of the reasons noted above.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The Southwest Access Road is not an action alternative evaluated in the EIS.

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50	Howard Adams	Gentlemen: I would like to see the PAN project of Midway Gold get approval of their EIS to mine. The property has been explored since the 1980's by several different companies. I worked at Bald Mountain Mine for three years mostly around the old Alligator Ridge mine. The geology is very similar and an oxide deposit very amenable to ADR extraction. This would provide employment for several construction workers and future miners from Ely and Eureka, Nevada. I am at retirement age now but was still an active geologist until the end of March 2013. I have had a rich and rewarding life in the mining industry and wish this will remain for those coming out of high school and college. I do not plan to actively search for work at Pan but have had mining claims within sight of the property. If the EIS is approved maybe the operation will have the opportunity to study areas adjacent to their property. Thanks for your interest in public comment and opportunity to provide new jobs. The only real wealth comes from mining, ranching, farming, logging, and other natural resources.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
51	Ray Farnsworth, Western Nevada Kenworth	I am a 3rd generation Nevadan. Most of us born in Ely. My sons are the 4th generation Nevadans and very proud of our state. My Grandfather, Dad, and myself have all raised our families working in or working as a vendor/supplier to the mining industries. My son is also working with a vendor/supplier company so the mines are our lives. Through the years the mining industry has made great improvements in reclamation, community, habitat and job revenues. I know a lot of that has come from your BLM studies. All mines currently spend a lot of money and time devoted to those issues and midway has put forth great efforts and money making the pan mine a reality. I strongly support the approval of the pan mine for continued job growth and revenue for our great State of Nevada.	POS	Comment noted.
52	Roger Newell	Dear Miles Kreidler: First of all, thanks to you and to the BLM for working on permitting issues regarding the Pan Gold Mining Project. The time and effort you have devoted to this project is much appreciated, and I am sure the project will benefit from your work. The project will provide solid and long lasting benefits to White Pine County in the form of between 150 to 200 badly needed quality jobs. In addition to this immediate benefit, a longer term benefit will derive from opportunities that will be available for on the job training to advance skills and abilities of men and women in the community that are interested in personal development. These people will have an opportunity to learn important skills that will allow them to add value back into the community and to their families. Environmentally, the Pan Project is in a sage-grouse area, and Midway is itself working hard and supports focused research regarding sage-grouse issues. Where the sage-grouse and the Pan Project overlap, Midway will act to minimize and mitigate impacts on the sage-grouse population. The Pan Project has a solid economic basis, will be a positive addition to White Pine County, and I support approving the project for full development. Again, thank you for your time and efforts devoted to permitting the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The mitigation plans for the sage-grouse impacts are discussed in the EIS.

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53	John Welsh, President Welsh Hagen Associates	Gentlemen, I have reviewed the proposed Pan Project EIS and I am writing to support the development of the mine as proposed with the Alternative Waste Rock location and the proposed power line location (not the alternative that is several miles longer). My small business provides engineering services to the mining industry and my 15 employees live and work throughout Nevada. As we travel to the various mine sites, we buy fuel, food, and supplies from local vendors and routinely rent motel rooms and small equipment in mining communities. Our economic impact does not get counted in the statistics, but it is due to the mining of minerals. If we continue to develop new mines, mining can remain a sustainable endeavor in Nevada. We need to preserve the jobs we have and create new jobs whenever possible. Respectfully submitted in Favor of the Pan Project.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
54	Mark D. Compton, President Utah Mining Associates	Dear Mr. Kreidler, The Utah Mining Association (UMA) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Midway Gold's Pan Project in White Pine County, Nevada. UMA supports Midway Gold and the good paying, environmentally sound mining jobs the Pan Project will create. UMA is a 97 year old, 142 member, non-profit, non-partisan trade association representing the interests of the mining industry in Utah. UMA members are actively involved in exploration and mining operations on public and private lands throughout the state. Our diverse membership includes every facet of the mining industry, including geology, exploration, mining, engineering, equipment manufacturing, legal and technical services, and sales of equipment and supplies. Midway Gold is a UMA member, and the Pan Project will provide tremendous economic benefits to regional businesses, including those in Utah, that will service and supply the mine. It is readily apparent by studying the DEIS that Midway Gold and the BLM have developed a solid plan that will employ 160 people during the construction phase and provide 150 good-paying jobs during the mine operation, all while protecting the surrounding environment, including water and wildlife. We support Midway's proposed action, along with the BLM's suggested modifications to the waste rock design. The waste rock design modifications will decrease land disturbance by 79 acres, thereby affecting less sage-grouse habitat. However, we do not favor the South West Power Line Alternative that proposes an unnecessarily long, more circuitous power line. Midway's proposed line will be 8.5 miles long, while the proposed Alternative would be 32 miles long, unduly increasing disturbance and costs. Any benefits to the sage-grouse realized by the longer alternative would be more than offset by the negative impacts to other birds, vegetation and water resources. We urge you to adopt Midway Gold's proposed action, with the suggested modifications to the waste rock design. The measurable socioeconomic benefits of the Pan Project, along with the low environmental impacts, make this a win win for the region. Thank you for your consideration of our comments.	POS, SUP- WRDA, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the alternative power line are described in the EIS.

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55	Don Whipple, VP Eagle View Contractors	We at Eagle View Contractors strongly support the Pan Mine project. Eagle View Contractors is a Nevada contractor and corporation that has suffered significantly in the economic downturn of the past few years. In 2012, Eagle View did less than half of the gross revenues that it had done just a few years ago. Should Eagle View be successful in contracting with Midway, the Pan Mine provides an opportunity for us to rehire many, if not all, of our laid-off employees that had been loyal to our company for years. We appreciate the Governments interest in our opinions.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
56	Ann Carpenter	Mr. Kreidler: Although I work for Granite Construction in the role of Mining Business Development Manager, I am writing as a citizen in support of the Midway Gold Pan Project, located east of Eureka, Nevada. I have these general comments: The Pan Mine is good for jobs creation, and has a stated objective of hiring locally and from Nevada-based entities. The tax proceeds from the mine construction and production phases will be good for the local and state economies, helping with employment diversification as well as revenue generation. Upon reviewing the mine plans and Alternatives in the DEIS, along with the understanding that there is no surface water and groundwater is at depths well below the designed open pit depths, I believe mine environmental considerations will be minimal and mitigation plans coupled with the robust reclamation plans will secure this site with strong environmental management and stewardship measures. In consideration of the Proposed Action and the two Alternatives outlined in the DEIS, I have these comments: • I support the Waste Rock Disposal Site Design Alternative for decreased land disturbance; least effect on sage-grouse and other wildlife considerations; and decreased visual impacts. I oppose the South West Power Line Alternative-32 miles vs. about 8 miles in proposed action. Undue focus on single species (sage-grouse) negates focus on the broader diverse environmental impacts. Other concerns include: Safety concerns for mine employees and contractors; increased negative visual impacts; reduced grazing; greater risks to diverse wildlife I have been in the exploration and mine development industries for over 33 years; I lived in Ely from 1982-1984, and would have stayed except there were no mining-related jobs. I am excited about the development of this mine project in eastern Nevada, contributing to economic diversification in the region, while also providing respected environmental controls and mitigation measures.	POS, SUP- WRDA, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the WRDA and power line alternative are described in the EIS.

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57	Graeme Major	I have been a resident of Nevada for more than 15 years and live here by choice because of the lifestyle and opportunities. I value the opportunities for outdoor recreation, and also recognize the importance of the business and employment opportunities that sustain Nevada's rural communities. I am familiar with the Eureka area including the Pan site. I have read the Executive Summary of the DEIS and consider that this project represents a good opportunity to provide support to rural Nevada with minimal potential impact to outdoor opportunities and groundwater resources. Projects of this nature are essential for sustaining rural communities, and the historic mining and outdoor culture of the state. Based on my knowledge of the area and the information presented in the ES of the DEIS I strongly support the development of this project. Design options that minimize the area of disturbance should be preferred.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
58	John Collins	My name is John Collins and I am a resident of Douglas County, Nevada. While I may live several hundred miles away from the proposed Pan Mine, I want to offer my support for this project. Mining is an important industry in our state, and is one of the only industries that supports rural communities. The mines are invested in their communities and support programs like schools, athletics, arts, and public parks and open space. Mining is also an important tax base in our state, and not only supports the community around the mines, but the state as a whole. I work for Granite Construction Company, and to me and my coworkers, and my family, this project means an opportunity for work, not only for the mine, but for roads and infrastructure to support the mine, increased tax revenue for roads for the state and county, and development and housing for Ely and Eureka. I am also a hunter and enjoy outdoor activities with my family. Mining does scar the earth during production, so I would encourage you to choose options that limit the footprint of disturbance and minimize the length of power lines and other infrastructure that remain visible throughout production mining and beyond. Projects and industries like mining support so much more than themselves, and while we need to manage them and not let them operate unregulated, we need to not only allow them, but encourage them to explore and develop new resources. I hope you will allow and encourage Midway Gold in such endeavors. Thank you for your time and consideration of Midway Gold and the Pan Mine Project.	POS, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
59	Nolan Smith, Geological Engineer	Mr. Kreidler, I am familiar with Midway's Pan project and know many of the principles involved. I have the utmost confidence in the project's success and those involved. I urge you to grant Midway their permit in a timely manner with the waste rock alternative design.	POS	Statement noted.

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60	Linda A. Derbidge	I would like to take this opportunity to express my support for the Midway Gold Pan Mine project. I have been a resident of Ely for over thirty-eight years. My husband and I bought a business here in 1975 and have been business owners ever since. I have seen the economy of the area at it's very worst and also at some of the best times. I feel that permitting Midway Gold to operate the Pan Mine would not only make a very positive impact on the economy in Ely and surrounding areas but would give our young people an opportunity to stay in the community and make a living. I have seen the Midway Gold proposal and what they have already done to minimize the impact the mining operation would have on the environment. I appreciate everything this area has to offer and the job the BLM is doing to maintain the integrity of our environmental landscape.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
61	Bob Warriner	Thank goodness for companies like Midway who are willing to risk millions to develop new projects that result in more jobs and economic stability. My company is a supplier to the mining industry and employs more than 40 people in Nevada. Without mining, we would employ 0. I strongly endorse the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
62	Bill McNeil, Cate Equipment Co	Dear Mr. Kreidler I am writing to comment on Midway Gold's request for permission to open a gold mine on their Pan Project. Cate Equipment Company is a distributor for mining equipment with locations in Salt Lake City, Pocatello, Idaho, Gillette Wyoming and Elko Nevada. The Midway Gold Pan Project will result in an initial benefit to Cate Equipment of \$2,000,000.00 in sales with additional \$6,000,000.00 in business over the next several years. It may also result in us adding additional personnel in the Ely area. One concern we have is the proposed alternative power line and access road. We feel the original proposal for the power line and access road is far more appropriate than the alternate proposal. The alternate proposal will add at least (1) one additional hour of travel each way for our service technicians driving large DOT compliant trucks. The alternate route is considerably more dangerous with more hills and blind curves especially causing more concern in the dark and in winter. We ask that you give strong consideration to the original power line and access road proposal. We hope you approve Midway Gold's application for permit to open the Pan Project. Please feel free to contact us if you have any questions regarding these comments.	POS, SOC, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The Southwest Access Road is not an action alternative evaluated in the EIS. The environmental effects of the WRDA and power line alternative are described in the EIS.

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63	Frank Yu	<p>Dear Mr. Kreidler, I am writing to you regarding Midway Gold's Draft Environmental Impact Statement for its Pan project. As a director and a substantial shareholder of Midway, I would like to provide my comments in the following two areas, 1. Economic Impacts Midway Gold currently has multiple gold mining projects in Nevada and the company is committed to bring these projects to production. The Pan project is the first in line and is expected to have a significant economic impact to the State of Nevada and the local communities. The project is projected to generate approximately a. \$100 Million capital investment b. 150 jobs (\$11.5 Million payroll per year) c. \$20 Million purchases per year in Nevada d. \$28.9 Million Net Proceeds Tax (at \$1550/oz gold) or \$18.1 Million (at \$1200/oz gold) e. \$9.8 Million per year property taxes over the first 8 years 2. Environmental Issues Midway Gold is committed to address and minimize any environmental impact that may arise due to the operation of its Pan project. One example will be the sage-grouse issue which is currently affecting business opportunities across the state. We support the effort to have an independent and well founded research to determine the real and measurable issues and impacts regarding sage-grouse. Prior to that, we are committed to do what is right and will assess any impact observed during operations and mitigate appropriately. In today's economic environment, I believe the social and economic benefits recognized from the project far outweigh any potential environmental impact. I strongly urge you to advance the EIS process for Midway Gold's Pan project in an expeditious manner. Thank you!</p>	POS, SOC	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The descriptions of the proposed study and other mitigation measures for sage-grouse impacts are included in the FEIS.</p>
64	Glenn & Charlotte Hammock	<p>We, Glenn & Charlotte Hammock approve the opening of Midway Gold Pan project here in White Pine County. We feel it would be very positive for our communities' economic growth. The company has already made a positive impact on our community. Ever since the Robinson Mine layoffs, White Pine Counties economy has taken a big hit and the community has been really hurt. Many people have left the area vowing not to return and there are so many who have stayed that are still unemployed. Us that live here take very good care of our lands and wildlife and don't see where Midway would change that. We live here because we love the area and wildlife and like all of you, watch out for people that try to destroy what we have. We see that if Midway opened up, it would only have a very positive impact on everything and everyone here in White Pine County. Midway could only make things better so that die hard White Pine County people won't have to leave. Thank you very much.</p>	POS	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>

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65	Steven C. Borell, PE Borell Consulting Services LLC	Dear Mr. Kreidler, The Midway Gold Pan project provides a great economic opportunity for the immediate future for this area of Nevada. This is unique for the Nation right now when quality, skilled jobs are so badly needed. I support the Waste Rock Disposal Site Design Alternative and the Southwest Power Line Alternative. Both of these alternatives are better from the standpoint of both potential environmental impacts and at the same time they are less costly for the mine. Other waste rock and power line alternatives would have greater land disturbance an greater potential impacts on sage-grouse habitat. I urge that the Record of Decision be published at the earliest possible date that will provide a legally defensible decision.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the WRDA and power line alternative are described in the EIS.
66	William W. Walker, President Mine Development Analysis, Inc	Dear Mr. Kreidler, I wish to offer my support of the Pan Project for the following reasons:- 160 jobs during the one-year construction phase. 150 family wage jobs during operations. A majority of the workforce will be hired from the local region. The overall annual labor payroll for this project will be more than \$11 million. Property taxes are expected to bring in \$1.2 million per year. Nevada purchases are expected to total \$20 million per year. This project's overall capital investment is \$100 million. The net proceeds tax is expected to bring in \$28 million with a gold price of \$1550/oz. The BLM's Waste Rock Disposal Site Design Alternative should also be implemented as it minimizes the amount of land necessary for the operation of the Pan Project. Thank you for considering my support of this valuable economic addition to the economy of Ely and White Pine County.	POS, SOC	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the WRDA Alternative are described in the EIS.
67	Catherine Clark, Environmental Director Western Lithium	Hi Miles – I understand that you are the person in charge for the Pan Mine Project Draft Environmental Impact Statement. I was reviewing the DEIS document on-line and noticed that Appendix 4A Bird and Bat Conservation Strategy is not posted or available for download on the web site. Appendix 4A is incorrectly labeled as the Mitigation Plan. Would it be possible for the BLM to both a) post the appendix 4A Bird and Bat Conservation Strategy document on the web site, and b) send me a copy for my review. My contact information is below. Should you have any questions, feel free to contact me at your convenience. Thank you.	INF	The BBCS was not included for publication in the DEIS; however, will be available with the FEIS.

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68	Robert Parker, Industrial Division Manager Ames Construction	<p>Mr. Kreidler, Ames Construction, Inc. is a heavy civil, mining and industrial general contractor that has maintained a local office in Carlin, Nevada since 1989. We are a major supplier of construction services to the US mining industry. Additionally, Ames has had its Western Regional headquarters in nearby West Valley City, Utah since 1985. We are very familiar with the Pan Mine project, and have reviewed the Draft Environmental Impact Statement. We are very confident in Midway Gold's experienced management team and their commitment to environmental stewardship. The design and construction of this project will provide about 150 well-paying construction jobs for 18 months, and similar number of long-term well-paying jobs for at least the next 13 years. These jobs represent a tremendous benefit to White Pine County, nearby Eureka County, the State of Nevada, and economic benefits throughout the US as design firms are engaged and mining equipment and plant construction materials and are purchased. The Pan Mine project is going to employ long-established and proven mining and processing methods that minimize operational risk. We have reviewed the Environmental Protection Measures for the Proposed Action and believe them to be comprehensive, reasonable, and customary. We would expect negligible environmental impacts if the project is managed, monitored and inspected to ensure compliance with their operating permits and proposed actions. With respect to the Southwest Power line alternative, we urge the common sense approach, the shortest route (8.2 miles vs. 32 miles), which should result in the least environmental impact and would be the most practical and cost effective. The shorter route has the additional advantage of avoiding negative impacts to other birds, vegetation and water resources. With respect to the Waste Rock Disposal Site Alternative Design, it makes the most sense to limit the footprint of the disposal site by some 79 acres which would reduce impacts to potential sage-grouse habitat. We support the alternative design. The Midway Gold Pan Mine Project has our unqualified support!</p>	POS, OPP- SWA, Sup- WRDA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the WRDA and power line alternative are described in the EIS.</p>

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69	Norman Schwab, Uranium One	Mr. Kreidler I was fortunate to be exposed to the Pan Project in May 2009 and also got to know the people involved. It is evident that Midway Gold has taken this project much further and employed the necessary people to support the planning and permitting process, who have had a positive impact on the economy of the area. The Pan Project will clearly require more employees and these employees and associated project expenditure will have a positive impact on the economy of Ely and White Pine County. I have been following efforts to address the reported decline in the number of sage-grouse for several years. In my opinion, a scientifically conclusive method to address this reported decline has not yet been identified, particularly whilst hunting of the sage-grouse is continuing. Midway Gold's commitment to assess any impacts to the Pan Project area sage-grouse population during operations is commendable. Their further commitment to mitigate any adverse impacts upon the sage-grouse should be supported. These proposed actions by Midway Gold should suffice until a scientifically based plan for addressing the reported sage-grouse decline is developed. The waste rock site design alternative included in the DEIS should be implemented. It clearly makes sense to disturb the minimum amount of land necessary for the economical operation of the Pan Project. Midway Gold has committed to caring for all species at the Pan Project site. Requirements for mitigating impacts should be reasonable and proportional to the land area disturbed by the project. Thank you for considering my comments.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the WRDA Alternative are described in the EIS.
70	Warren Thompson, Nevada Exploration Manager	To whom it may concern, I write on behalf of Midway Gold and their efforts to advance a very important exploration project in our state of Nevada. Please understand my company Premier Gold Mines USA (Au Reka Gold) is just finishing a POO at Cove Project in Lander County. The benefits are many and the negatives are few. Midway and the BLM have done a good job of developing a plan that will employ 150 people at good paying jobs, all while protecting the surrounding environment, including water and wildlife. The BLM is considering two alternatives; we support Midway's proposed action along with the BLM's suggested modifications to the waste rock design, but we do not favor the alternative proposing an unnecessarily long power line. Please consider the value of this project in our negative economy. Please consider this project will give back more to the regional and local economy/government if it moves forward.	POS, SUP- WRDA, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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71	Cory Hayes Application Engineer Mining and Industrial Nexans AmerCable	Mr. Miles Kreidler, Please move forward with the DEIS in favor of the Midway Gold - Pan Mine Project. The Pan Mine is good for the economy and that is an important factor in America right now – every job counts! Of the two alternatives proposed - the Waste Rock Disposal Site Design Alternative seems to make sense. The proposed the Southwest Power Line Alternative however is contrary to Midway's proposed line that will be 8.5 miles long, while the proposed Alternative would be 32 miles long, unduly increasing disturbance and costs. Thank you for taking the time to read my opinion on this matter please take into consideration in your decision.	POS, SUP- WRDA, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The environmental effects of the power line alternative are described in the EIS.
72.1	Jamie Sturgess, MS Ecology UC Davis	Dear District Manager: Please accept these comments from an experienced NEPA professional, degreed ecologist, and minerals industry veteran on both public private, and state lands. My experience with NEPA has included power lines, open pit precious line and base metals and BLM, National Forest, and Endangered Species issues as well as water quality concerns. Through all of these proceedings, which are included over a dozen Environmental Assessments for mines, as well as a half dozen EIS's, three things come out as almost universal:	GEN	Statement noted.
72.2	Jamie Sturgess, MS Ecology UC Davis	Shorter distances means lower impacts. Direct access routes impact less than indirect access routes. And common-sense selections of alternatives are almost always superior and more supportable than contrived inelegant fixes to perceived problems. To the point for the Midway Mine Plan: avoiding or skirting a sage-grouse area with a 32 mile long power line instead of an 8 mile long power line is not conservation. It is reality evasion. It is tripling or worse of costs, for a reason that is not likely required to meet ESA section 7 consultation needs to avoid either jeopardy or adverse modification to critical habitat. In a very real way it is not a reasonable or prudent alternative. Not to suggest it is not without basis or without some positive mitigative values, but it is not compelling as a conclusion. By this approach, the BLM should close all of its roads through sage-grouse habitat, and take other even more draconian steps, if it would avoid jeopardy. But in this case, there is no jeopardy at question and the idea that the extra 24 miles of power line make LESS IMPACT than a more direct route is arguable at best, and litigatable at worst. BLM rules require mitigation of unreasonable impact. I suggest that quadrupling power line construction costs, impacts, and maintenance forever is unreasonable. Perhaps avoid a specific lek area with a roundabout route, but not that extreme. On other matters, the collaboration of mining management and BLM ID Team to revise the waste rock and footprint are superb examples of impact avoidance. Thank you for the chance to comment.	OPP-SWA	The alternative power line would be a greater distance from the active leks than the Proposed Action route, which would reduce potential impacts to the leks from the power line, compared to the Proposed Action. The effects of the alternative power line itself are described in the EIS. The mitigation plan for sage-grouse is also included in the EIS. The BLM will decide on the appropriate power line alternative considering the balance of effects and benefits of both the action alternative in question.
73.1	Curtis Moore	Dear Mr. Kreidler, BLM: As a supporter of mining and domestic mineral development, I submit this email in support of the proposed action in the DEIS for Midway Gold's Pan Mine in Nevada.	POS	Statement noted.

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73.2	Curtis Moore	I believe the BLM compiled an excellent record in support of the proposed action by fully examining the costs, benefits, and environmental, economic, safety, wildlife, cultural and other impacts.	SUP-PA	Statement noted.
73.2	Curtis Moore	Indeed, there are some people who would like to see all mining cease in the U.S., including mining on BLM lands. However, the BLM is required to manage its lands under a principal of "multiple use", which includes resource development. And, the U.S. should develop our minerals, because we need the raw materials for our industry, energy, and advanced, dynamic economy. In fact, the U.S. develops our minerals more responsibly than any other country in the World, because we have the toughest laws, regulations, and enforcement. Government agencies like the BLM help ensure responsible resource development. Lastly, at a local level, good mining jobs will be created and economic development will occur. While the national economy appears to be improving, we can use all the economic growth we can get these days. Again, thank you for your hard work, and I hope you give the final approval for this good project to move forward.	GEN	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
74.1	Stephen Quin, President & CEO Midas Gold Inc	Dear Sir: I am writing in support of Midway's planned development of the Pan project in Nevada as it should be good for the economy in the current very challenging fiscal environment faced by Nevada and the USA. Midway notes that the Pan mine, if approved, would create 160 jobs during the construction phase and support 150 jobs during operations, mostly to be hired from the local region, injecting significant payroll, taxes, purchasing and contracts into the local economy. These significant benefits should be weighed very carefully in the decision process.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
74.2	Stephen Quin, President & CEO Midas Gold Inc	I understand that the DEIS puts forth two primary alternatives to Midway's proposal - a modified waste rock site design and a longer power line. I support the alternative waste rock site design, but do not support the longer power line option. I support the modified waste rock site design because it significantly decreases land disturbance, impact on sage-grouse habitat, visual impact and costs.	SUP- WRDA, OPP-SWA	Statement noted. The environmental effects of the alternative WRDA and power line are evaluated in the EIS.
74.3	Stephen Quin, President & CEO Midas Gold Inc	I am not supportive of the longer power line route because the longer route would unduly increase disturbance and costs, reduce livestock grazing, while potentially increase the risk for impacting habitat for burrowing owls and golden eagles. As the EIS says, this longer route likely impacts on four golden eagle nests and two burrowing owl nesting territories that may more than offset any benefits to sage-grouse habitat. Thank you for the opportunity to comment.	OPP-SWA	Statement noted. The environmental effects of the alternative power line are evaluated in the EIS.
75.1	Nathaniel Klein Hale Capital Partners	Mr. Kreidler, After reviewing Midway Gold's Draft Environmental Impact Statement for the Pan Project (DEIS) I am in complete support of the project.	POS	Statement noted.

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75.2	Nathaniel Klein Hale Capital Partners	The Midway team has thoroughly examined the project and has put forth a plan that is both environmentally responsible and offers significant socioeconomic benefits. The current economic state of Nevada is bleak, resulting in significant unemployment. The Pan Project will provide jobs for Nevada, which will create income for many to spend locally that will trickle through the local economy. This is a needed project for Nevada and Ely.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
75.3	Nathaniel Klein Hale Capital Partners	The Midway team understands the sensitivity of the sage-grouse across Nevada. This issue is not just affecting the Pan Project but many business opportunities across Nevada. The Midway approach discussed in the DEIS should be used as the gold standard to address this issue. Midway takes this issue seriously and has put forth a plan that will mitigate any concerns.	POS	Comment noted.
75.4	Nathaniel Klein Hale Capital Partners	Lastly, the BLM alternative waste rock disposal site in the DEIS will reduce the acreage of land disturbed in the area and reduce potential impacts to sage-grouse habitat.	SUP- WRDA	Statement noted. The environmental effects of the WRDA Alternative are evaluated in the EIS.
75.5	Nathaniel Klein Hale Capital Partners	I am in favor of the proposed project, which has socioeconomic benefits that significantly outweigh the minimal, if any, environmental impact.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
76	Charlie Palmer Harrison Western Construction	As in all parts of the country we need jobs. This project Midway Gold is trying to permit in White Pine County should be highly considered. The mining industry supplies well paying jobs which are will help the local economy. Midway Gold supports regulatory and environmental concerns of the BLM and is committed to compliance. The project is a plus for everyone. I support this worthy project and believe their permit should be granted.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
77	Dave Bentel	Dear Mr. Kreidler. I am in support of this project going forward because Midway are responsible project proponents who make it clear that they are very supportive of technical solutions that are protective against environmental contamination, and have public health and safety at the top of their list. Under these circumstances the project looks to be an economic win for this region of Nevada.	POS	Comment noted.

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78	Richard Landers & PJ Benet-Davis, Owners Scotty's RV Park	<p>Dear Mr. Kreidler, As business owners (Scotty's RV Park in Eureka) and as responsible and happy residents of Eureka, we wish to indicate our support for the success of the nearby Midway Gold Pan project. When so many parts of the country are having tough times, we feel fortunate to live in Nevada where we are blessed with abundant natural resources, and where the intelligent management and use of those resources will be a continuing asset to the local and national economy. We believe that the effects of the substantial taxes and payroll monies from the Pan Project will benefit everyone in the area in different ways and that the 150 or so mining jobs (at good wages!) will generate other supporting jobs that we can't even imagine yet. Our healthcare facilities in Eureka will likely expand to meet the increased population, and all of us (particularly some of us seniors!) would certainly welcome that.</p> <p>As an aside, one of our best friends is a local mature horsewoman, who has been training horses and people for most of her adult life, and she still has a couple of beautiful Appaloosas who are chomping at the bit to get working again. Things have been a little slow for our friend these last few years because of the economy, but an increasing population of workers (and their families) here would likely enable her to get back in the saddle again and start training a new generation of riders.</p> <p>Comments we have heard from others regarding the Pan Mine has been overwhelmingly positive. We strongly support the Pan Project and hope that the responsible decisions of your Office will permit the operation to move ahead.</p>	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
79	Scot Troter	To whom it may concern: I, Scot Troter, living at 1580 Fawn Street; Pahrump, Nevada, 89048 would like to see the Pan Mine approved. I am a current student at Great Basin College in Pahrump. Many of the students here will need jobs once they graduate. Mining has been a great industry here in Nevada (I was born in Las Vegas), and will be for many years to come.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
80.1	Bernie Romero	I want to be on the mailing list for future updates and notifications for this project	LST	Statement noted. Commenter has been added to the mailing list.
80.2	Bernie Romero	<p>Comment: I fully support this project, mainly because of the employment opportunities and the economic benefit it will provide for White Pine County and the State of Nevada. I believe these benefits far outweigh any environmental impact that cannot be mitigated. Income from the jobs generated by this project will largely remain in the community and will help in improving the infrastructure for the City of Ely and White Pine County. For so long these governments have struggled to make ends meet and in doing so, the planned capital projects have been placed on the back burner and have therefore degenerated. Our schools have suffered because of lack of funding and our children and grand children are receiving inadequate education. Projects such as this will assist in bringing us back to normal or above average.</p>	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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80.3	Bernie Romero	I also support the well-founded and proven research that is used to determine real and measurable issues and impacts to other indigenous animals living the disturbed areas. Even though, it were not for Federal Requirements, the average citizen would not these animals existed. All in all, I fully support this project and urge the Bureau of Land Management to issue a record of decision and allow Midway to proceed with its mining operations.	POS	Statement noted.
81.1	Ron Espell, VP Environment American Vanadium	I would like to provide the following comments on the Midway Gold Pan Project: 1. I fully support this project for the following reasons:	POS	Statement noted.
81.2	Ron Espell, VP Environment American Vanadium	a. JOBS & REVENUE – The real and measurable socioeconomic benefits far outweigh the comparatively low environmental impacts the Pan Mine could produce. Midway has already made a positive impact in the local community and future benefits including jobs and cash flow into the region are being counted on to assist economic rejuvenation in the area.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
81.3	Ron Espell, VP Environment American Vanadium	b. sage-grouse MITIGATION – The sage-grouse mitigation plan included in the EIS is comprehensive and fully addresses the possible impacts.	POS, M&M	Statement noted.
81.4	Ron Espell, VP Environment American Vanadium	c. WASTE ROCK DISPOSAL SITE DESIGN ALTERNATIVE – The alternative in the DEIS that will reduce the acreage of land disturbed in the area and reduces impacts to potential sage-grouse habitat.	SUP- WRDA	Statement noted.
81.5	Ron Espell, VP Environment American Vanadium	d. OTHER WILDLIFE MITIGATION –The analysis in the DEIS is appropriate to analyze impacts to other species such as to the burrowing owl, pygmy rabbit, kangaroo mouse and other wildlife. The mitigation proposed is appropriate to the potential impacts.	POS, M&M	Statement noted.

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82	Brent Johnson, InterraLogic	<p>Dear Mr. Kreidler, I am writing as a private citizen and mining geochemistry and hydrogeology expert, to express my support for Midway Gold's Pan Mine project in general, and for the Draft EIS in particular. I have worked with scores of mining companies in Nevada over the past 20 years and the Midway Gold team ranks among the best I have worked with. I am proud to have had the opportunity to work with the solid team at Midway Gold and observed how they have responded to the various environmental issues they faced through the permitting process. From a geochemistry standpoint, the Pan project has the benefit of abundant carbonate material and benign waste rock which will be easily manageable using standard mining and closure practices. This means there is no risk of acid rock drainage and metals leaching potential is low. In addition, the low rainfall and high evaporation at the site provide additional assurance that no acid rock drainage or metals leaching will be generated. The alternative waste rock disposal facility proposed in the DEIS poses negligible risk from an acid-rock drainage or metals leaching standpoint (same as proposed action), but also provides additional benefits compared to the proposed action in that it will have a smaller disturbance area. The hydrogeologic conditions at the site provide a perfect scenario for a mining project; abundant, warm water to supply the mine, from a confined (i.e., isolated) bedrock aquifer deep beneath the project. Drawing water from this aquifer will not affect any other local users due to the large distance from other users, the highly-productive nature of the aquifer, and the stratigraphy that dips to the west, further buffering the local bedrock aquifer from the alluvial groundwater users miles away. In addition, water levels are very deep, resulting in a very thick unsaturated zone beneath the mine facilities that provides extra protection of groundwater resources in the case of accidental discharge or leakage from mine facilities. While I am no economist, it is obvious that the project will supply sorely needed employment to the region in a time when unemployment in the nation and in Nevada in particular is an acute problem.</p>	POS, WTR	Comment noted. The potential impacts to water quality from the proposed mining operations are described in the EIS.
83	Kenneth A. Brunk, Chairman, President & CEO Midway Gold	<p>Dear Mr. Kreidler I am writing as a private citizen to endorse the plan that Midway Gold is proposing to mine the deposit at the Pan project in Nevada. In a forty-two year career I have conducted numerous feasibility studies as well as been responsible for designing, constructing, staffing and operating multiple mining operations and improving process efficiencies around the world. The past four years I have served as Chairman, President and CEO of Midway, pleased to lead a team with equally deep experience in mine planning and operation. This team has worked hard to bring the Pan mine into reality, pursuing a sustainable approach to mining. The Pan Mine will be exemplary, benefitting from the fortunate environmental factors of an arid climate, deep aquifer, highly buffering carbonate geologic setting. The mine has been designed to minimize environmental and social impacts, and will bring economic advantages to Nevada and the communities we are part of. Mining plays a significant role in Nevada's economy, contributing more than 6.5 billion dollars or nearly 5 percent of the state</p>	POS, SOC	Statement noted. The socioeconomic and other environmental information provided in the comment has been considered in developing the EIS.

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		<p>GDP (up more than 400 percent since 2004). The mining industry accounted for 19.7 percent of all employment growth June 2009-June 2012 (2,600 jobs out of 13,200 net growth statewide). Mining contributed \$417.2 million in Nevada property, sales, and net proceeds tax in 2011 (statistics available from the Nevada Mining Association website: http://www.nevadamining.org/issues/policy/pdfs/NevadaEconomyandMining.pdf). Through the Pan Mine, Midway is well situated to contribute to this important sector of Nevada's economy. The Pan Mine will provide 160 jobs during the one-year construction phase and 150 jobs during operations, with the expectation that the majority of the workforce will be hired from the local region. The overall annual labor payroll for this project will be more than \$11 million. Property taxes are expected to bring in \$1.2 million per year and the net proceeds tax is projected to bring in \$28 million (gold price of \$1550/oz.). The project's overall capital investment is \$100 million with Nevada purchases expected to an average of \$20 million per year. Midway is even now working to reduce the environmental impact of the mine plan. We prefer the waste rock disposal site alternative identified in the Draft EIS because it will occupy less sage-grouse general habitat, as well as reduce visual impacts and total acreage disturbed by 79 acres. We are voluntarily modifying our designs so that we will meet the ICMI International Cyanide Management Code. We are making plans to house and transport employees as necessary to provide the best working conditions possible. These plans have been outlined in Midway's formal comments to the BLM on the DEIS. Midway has already made contributions to the local community through participation in community events as well as contributions to deserving organizations. Midway has worked with the BLM and NDOW to address concerns regarding sage-grouse habitat. The access road has been routed to avoid and shield leks found in the area. Further site-specific surveys have added to the BLM's understanding of sage-grouse usage of local habitat. In addition, Midway has committed to an independent study to be conducted by the USGS, funding it for more than \$1.5 million. Midway will also pay for mitigation to actual impacts identified by these studies. The Southwest Powerline Alternative has been studied but it has been found that any benefits to the sage-grouse brought by the longer alternative would be more than offset by the negative impacts to other birds, vegetation and water resources. However, Midway supports modifications to the powerline that will also moderate impacts to any nesting sage-grouse in the area. I appreciate that the Egan field office of the BLM has worked with Midway to develop the plan to this point. We look forward to continued good stewardship on the part of the BLM.</p>		

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84	Doug Carriger, Sunrise Engineering	Mr. Kreidler I have had the opportunity to visit the Midway Gold office in Ely on several occasions. It was obvious to me that Midway Gold has employed a number of people in Ely to support the planning and permitting process for the Pan Project. I am confident that these employees have had a positive impact upon the economy of Ely and White Pine County. It would seem to me that the increased employees needed to operate the Pan Project by Midway Gold will have a greater positive impact upon the area economy. I have been following efforts to address the reported decline in the number of sage-grouse for several years. In my opinion, a scientifically conclusive method to address this reported decline has not yet been identified. Midway Gold's commitment to assess any impacts to the Pan Project area sage-grouse population during operations is commendable. Their further commitment to mitigate any adverse impacts upon the sage-grouse population should be supported. These proposed actions by Midway Gold should suffice until a scientifically based plan for addressing the reported sage-grouse population decline is developed. The waste rock site design alternative included in the DE IS should be implemented. It just makes sense to disturb the minimum amount of land necessary for the economical operation of the Pan Project. Midway Gold has committed to caring for all species at the Pan Project site. Requirements for mitigating impacts should be reasonable and proportional to the land area disturbed by the project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
85	Laura Fletcher, Business Manager Harrison Western Construction Corp	Dear Mr. Kreidler, Please accept this letter in support of Midway Gold's Pan Project in White Pine County, Nevada. The project will foster much-needed job opportunities, and Midway's planned mine can supply well-paying jobs to the local population, helping to diversify the local economies. In addition, Midway supports appropriate mitigation regarding the listing of the sage-grouse and is committed to addressing impacts identified. As an example, Midway supports the BLM's alternative waste rock disposal site, which will reduce the area of disturbance, thus addressing concerns to the local sage-grouse population. For these reasons, and in accordance with my own personal reasons to support all domestic mining efforts, I believe that Midway will be a "good citizen" of the mining community and should be granted their permits to proceed with the Pan Project. My employer, Harrison Western Construction Corporation, also supports Midway Gold in their pursuit of a successful mining project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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86	Don Beesley, Principal & Director Hardrock Consulting LLC	Attn: Miles Kreidler: My comments on the Pan Project DEIS: Jobs and Revenue: The potential socioeconomic benefits recognized from the project are expected to far outweigh the potential environmental impact. This is clear from the Draft EIS and what I have read from news releases. The location somewhat mid way between Eureka and Ely will make the project valuable to both communities. Sage-grouse Mitigation: The sage-grouse issue is currently affecting business opportunities across the state and Midway is no exception. I support well-founded and proven research that is used to determine real and measurable issues and impacts. Subsequent to this research, I support appropriate mitigation to help the bird and the sagebrush ecosystem as a whole. Prior to any outside well-founded and proven research, I would hope we do what is right and also hope we are committed to assessing any impacts observed during operations for appropriate mitigation. Waste Rock Disposal Site Design Alternative: The BLM has included an alternative waste rock disposal site in the DEIS that will reduce the acreage of land disturbed in the area. I support this alternative because the majority of the land is potential sage-grouse habitat. Choosing this alternative will reduce potential impacts to sage-grouse habitat. It is also more cost effective for operations which will enhance the viability of the operation and therefore also enhance the economic benefit to the communities.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
87	Laura Ruud	Dear BLM in Ely, Nevada, I would like to express my support for Midway Gold's Pan Project, currently being developed in White Pine County, Nevada. This area of Nevada is sorely in need of new job opportunities, and Midway's planned mine can supply well-paying jobs to the local population, helping to diversify the local economies. In addition, Midway supports appropriate mitigation regarding the listing of the sage-grouse and is committed to addressing impacts identified. As an example, Midway supports the BLM's alternative waste rock disposal site, which will reduce the area of disturbance, thus addressing concerns to the local sage-grouse population. For these reasons, I believe that Midway will be a "good citizen" of the mining community and should be granted their permits to proceed with the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
88	Bryan Larsen	To whom it may concern: I am writing you today to voice my support of the proposed Pan Mine Project West of Ely. In my opinion this project will add much needed employment opportunity to the White Pine County area. In addition, I think that Midway Gold is committed to sustainability and this operation will benefit the community in many ways for generations to come. I realize some individuals have concerns with this project but I have not heard any objections that are significant enough to block this project, or that cannot be mitigated in a reasonable way.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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89	David R. Shaddrick, Geologist	Dear Sir, I have reviewed the draft EIS submitted by Midway Gold and I am quite impressed. They have done an excellent job of covering all of the bases and will clearly be responsible stewards of our public lands. The alternatives proposed by the BLM appear to be effective and reasonable. I'm sure you are aware of the fact that projects of this type are very important for the economy of rural Nevada and should be encouraged wherever possible. I strongly support Midway Gold in its efforts to expand the economy and tax base of Nevada and I strongly support the efforts of the BLM to promote responsible development of our natural resources.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
90	Lynne Volpi, Coordinator Women's Mining Coalition	Dear. Mr. Kreidler; I would like to express my support for Midway Gold's Pan Project, currently being developed in White Pine County, Nevada. As you know, this area of Nevada is sorely in need of new job opportunities, and Midway's planned mine can supply well-paying jobs to the local population. In addition, Midway supports appropriate mitigation regarding the listing of the sage-grouse and is committed to assessing any impacts observed during their operations. Also with respect to sage-grouse, Midway supports the BLM's alternative waste rock disposal site, which will reduce the area of disturbance, thus positively impacting the local sage-grouse population. For these reasons, I believe that Midway will be a "good citizen" of the mining community and should be granted their permits to proceed with the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
91	Steve Stork, Principal Conrad & Son's Ltd	Dear BLM, I am writing to express support for Midway Gold's Pan Project in White Pine County Nevada. Midway has demonstrated that they are responsible stewards of our natural resources, by way of the plan presented. Midways project fits one of the many multiple uses of our public lands. I look forward to the final EIS process and its publication in the federal register.	POS	Statement noted.
92	Kevin Brown	Miles, I fully support Midway Gold's Pan Mine. It is clear that the mine will be operated in a safe and environmentally prudent manner by Midway under the BLM's auspices. The prospect of 150 fulltime jobs more than offsets the very well mitigated impacts to any sage-grouse. At a mitigation cost of over \$50,000.00 per sage-grouse, it is clear that Midway is going above and beyond in their duty to reasonably mitigate impacts. Apparently the BLM has come up with an alternate waste rock disposal site, which I support as long as the economic impact to Midway's mine operations is neutral or positive. This mine is especially important to Ely to diversify its economics, which currently revolve almost entirely around a single copper mine. Please support Ely and White Pine County with this new project.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
93	Paul Johnson, CFO WPCSD	Attn: Miles Kreidler Please accept this letter of support for the Midway Gold Corporation's Pan Project located in White Pine County, Nevada. Midway Gold's development of its Pan Project will provide a much needed boost to the communities and local governments in White Pine County. Not only will the tax revenue help local governments, the increase in employment and payroll will revitalize and support local businesses, community events and youth activities.	POS, SOC	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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		<p>The increase in tax base from property and net proceeds of minerals will help the local school district (White Pine County School District) address some of its facilities, technology and transportation needs that have been deferred over the years in order to maximize instructional and student support services.</p> <p>Many of the communities in White Pine County were founded through mining and have had a long relationship with the industry. As of today, mining is the largest private employer in the County. The potential financial benefits from the Pan Project will help fund public services, however perhaps the most valuable asset this development will bring are its human resources. The quality of a community is predicated on the quality of the people within the community. It has been our experience that the mining industry understands the significant role the community plays not only with job recruitment but also with job retention. Over the years mining industry employees have provided leadership for local governments and have helped revitalize community organizations including senior citizen and youth organizations. Their generous support through financial donations, sponsored events and fund raising activities have been fulfilled needs and provided benefits that would not have been possible without their support. We see the construction of the Pan Project as a key component to improve the financial landscape as well as the socioeconomic health and welfare of White Pine. It is critical to the economic viability of the communities, businesses and local governments in White Pine County that this project and similar projects be developed.</p>		
94	Donald Harris	<p>Miles K. Pan is a good gold project associated with the Ely and Eureka areas. Comments on the project include: 1. Impact to sage-grouse habitat, with a lek field located proximal to the proposed activity 2. Impact to ground water levels, presume that the mine water production will come from valley to west, which has major ranching/alfalfa growing area. 3. Has Midway secured water rights in the area and changed to point of diversion? 4. Relation to Gold Rock project. Has this been included in the analysis, as the project is close enough to use the Pan infrastructure? 5. Does Midway have the financial backing needed to complete this project and resultant reclamation? Two instances of small companies in the immediate area, Mt. Hamilton and Easy Junior, have gone defunct during process and Federal government ended up doing reclamation and relying on bond. 6. Impact to archeology sites, including carbonari sites and native American sites. Has this been adequately addressed to BLM satisfaction? 7. Rock types are very similar to the Emigrant Project of Newmont's near Carlin, NV. Has waste characterization been sufficiently addressed, so that we do not see acid mine drainage issues similar to Rain? There was a very extended HCT period for Emigrant to determine this. 8. With Mt Hope and Ruby Hill mines in Eureka, is there sufficient infrastructure to support Pan as a mine? Does Midway have a housing/staffing plan of merit?</p>	POS	<p>Groundwater would be obtained from the bedrock aquifer, which does not directly support the local farming. Midway has obtained leases on the water rights and has applied for a change in point of diversion. Gold Rock project impacts have not been included because that project has separate utilities. Midway has sufficient resources to develop the Pan Project and would be required to post an actual-cost reclamation/closure bond. Cultural resources impacts have been analyzed to the satisfaction of the BLM and State Historic Preservation Office. Static and HCT testing has provided sufficient information that BLM is confident the Pan waste rock will not be acid generating. The socioeconomic impact analysis has shown sufficient resources to support the Pan development.</p>

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95	Mark Dibble, Product Manager Wheeler Machinery Co	Hello. I would like to submit my support for Midway Gold's Pan Project. I know the Midway people and I believe that they will be excellent stewards of the property that they mine. I am confident that Midway will do a first rate reclamation job when the project is complete. The Pan project will deliver needed jobs to the people of Eureka and White Pine Counties in Nevada. The Pan project will also support businesses in Ely and Eureka.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
96	Karen & Kip Mecum	To whom it may concern, we wish to lend our support to and on behalf of the Midway Gold Pan Project. The Pan Project is one of those opportunities for BLM to support a project that will create good paying jobs in both a County and a State that will help to improve the local and regional economies in an area of the country where they are badly needed. Your time and attention in reading this email is greatly appreciated.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
97	Pete Mangum	My name is Rory L. (Pete) Mangum. I am a Community Based Instructor for Nevada Cooperative Extension. I am in charge of the 4-H program. I am also a 8-year Veteran Member of the White Pine County School District Board of Trustees. I am a Volunteer Firefighter and EMT for the City of Ely for 25 years. Midway Gold has been a dedicated and invested company in our City and County since they began here a few years ago. They support our schools, our 4-H program and other youth programs here. They are without a doubt investing in our community. Midway Gold will bring much needed jobs to our economy. The real and measurable economics far outweigh the low environmental impacts the Pan Mine can produce. Midway Gold's sage-grouse mitigation plan is solid. They are taking every effort to reduce impact on this habitat. They are spending a great deal of funding towards this effort. I am in favor of the Waste Rock Disposal Site Design Alternative that will help reduce the acreage of land disturbed in the area. I am confident Midway will work hand in hand with BLM biologists to reduce the impacts on all other wildlife in the area. It is my opinion, Midway Gold is a reputable company and we need them here in our county for growth in our schools. 4-H and other youth programs, Adult Organizations, 4-H Volunteer Leaders, and other aspects of our communities. Our elementary and middle schools are now over 100 years old. They are outdated, outlived and quite frankly tired places in which to educate the next generation. We need Midway's tax dollars to work towards newer more modern schools so that we can keep up with Science, Math, Language Arts, and especially Technology. Please consider all my comments in your decision.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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98	Daniel B. Funk	<p>I would like to focus my comments on the data found in the various DEIS documents that attempt to measure the socioeconomic impact of Midway's Pan Project on the following entities. Employee jobs and payroll income White Pine County property tax revenue White Pine County ad valorem tax revenue Jobs and payroll.</p> <p>While the Construction, Operations-Maintenance, and Reclamation phases of the mine life would extend to 28 years, the planned active mining period would encompass a 13 year period when employment would be at its maximum steady state of 176 employees. A substantial number of these jobs would be held by local residents which would represent a significant fraction of the White Pine County work force. As stated in the DEIS: 4.16-2.1, pg 4-92 "The Midway Mine operations would create major, long-term positive impacts on the economies of White Pine and Eureka counties and the Duckwater Reservation. Mine operations would result in beneficial, long-term impacts for individuals seeking stable employment as the mine would provide long-term employment and income throughout the life of the Proposed Action." Table 4.16-2, pg 4-92 indicates that the 176 jobs would produce annual labor income of \$12,099,967, or a 13 year total of \$157,299,571. Property tax revenue Table 4.16-3, pg 4-99, Estimated Property Tax Liabilities for the Pan Mine This table shows a breakdown of the property tax revenue that would accrue to various entities within White Pine County during the first 8 years of mine operations. Extended to the 13 year operational life of the mine, the estimated property tax revenue to the County would total \$15,925,000. Ad valorem tax revenue Ad valorem taxes would be levied on the net proceeds of mining (NPM), a function of production, costs of recovery and processing, and other variables. An assumption of gold at \$1550/ounce would result in NPM taxes totaling \$28.9 million over the life of the mine, of which an estimated \$21.2 million would accrue to White Pine County. There are a number of additional monetary benefits that would accrue to the surrounding community including but not limited to the multiplier effect of the income and revenue, sales tax receipts from expenditures by individuals and businesses, and the income and tax revenue generated from the construction and reclamation phases of the project which are not accounted for above. The above total in tax revenue and labor income stands at \$194,424,571, so that I believe it is not unreasonable to assume that with other increments added, the community stands to benefit on the order of 1 quarter of a billion dollars if the project is permitted. Further, I believe both Midway as a company and Pan as a project are viable entities. Midway, in an extremely tight credit environment, has secured more than 70% of the financing necessary to fund the project and awaits only the conclusion of the permitting process to secure the remainder. Pan is a relatively simple and inexpensive project on an all-in cost basis per ounce making the project failure risk minimal. In support of permitting the project I would also cite</p>	POS, SOC	Comments noted. The information provided by the commenter has been reviewed.

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		the BLM mission statement "IT IS THE MISSION OF THE BLM TO SUSTAIN THE HEALTH, DIVERSITY, AND PRODUCTIVITY OF THE PUBLIC LANDS FOR THE USE AND ENJOYMENT OF THE PRESENT AND FUTURE GENERATIONS" and the White Pine County Policy statement concerning mineral resources: 7. Mineral Resources The development of Nevada's mineral resources is desirable and necessary to the economy of the nation, the state and particularly to White Pine County. White Pine is the state's leading producer of copper and has produced vast quantities of gold, silver, and other metals. I believe permitting this project conforms to both the spirit and the letter of these statements. Thank you for your consideration.		
99	Mark L. Breeden, Senior VP Investments	Mr. Kreidler, I'm in favor of the project that Midway is proposing. As a past resident of McGill, Nevada when Kennecott was the main employer I realize how vital mining is to White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
100	Scott McLeod	To whom it may concern: I am a Nevada resident who would like to comment on Midway Gold's potential Pan Gold Project. I think it's a wonderful addition to our state. It will bring much needed "high" paying jobs to the rural communities. This in turn will help our local business and more importantly our state treasury in the form of taxes. We need more jobs for our youth and to help sustain our small rural communities. As a citizen of the state- I say give the mining company the permit they need and tell them to get to "WORK". Thank you for your time and consideration.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
101	Eben Robinson Technical Services	Dear Sir or Ma'am, I am writing in support of Midway Gold's Pan Project near Eureka. I work for a regional mining contractor based in Tucson but having local facilities and employees across Nevada. With the economy being what it is, we need all the jobs we can produce in this country. A new operation coming online in Nevada will provide opportunities not only locally but across the US. The mine in Nevada will need local employees; they will need equipment built in our shop in Tucson; our shop will buy parts from somewhere else; and eventually a factory somewhere needs raw materials from the mines to make whatever it is they are selling to consumers. I strongly support American jobs, please approve the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
102	Lennie Boteilho, Ames Construction, Inc.	Our company continues to have interest in this important project	POS	Statement noted.

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103	██████████	I was involved with the closure design of the north waste rock dump in early stages of the project. Based on my experience with the project, the alternative dump location would be preferable and reduce visual impact. As an engineer in a local design firm, this project could potentially allow us to increase our local workload and get involved in the design. This would help us hire another engineer in our Elko office.	POS, SUP- WRDA	Comment noted. The effects of the alternative WRDA are discussed in the EIS. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
104	Michael Hardy	After reviewing the Pan Mine EIS this project appears to have more benefit to the area/region than negative impact. I agree with all the proposed layouts & mitigation measures except one. The waste rock disposal site design alternative appears to have benefits including less visibility. I would recommend the alternative. This project should help to bring jobs & revenues to a region of Nevada that really need it.	POS	Comment noted. The effects of the alternative WRDA are discussed in the EIS. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
105	Harvie Tibbs	I want more mining.	POS	Statement noted.
106	Keith Norris	I plan to move to Ely soon.	POS	Statement noted.
107	Levien Brown	I believe in mining.	POS	Statement noted.
108	██████████	Welcome Midway-It is nice to see a company that cares about the entire communities, public, impact, and the care of the land involved-As a business owner, I've see the ups and downs of Ely over the past 30 years-I believe its Ely's turn to grow, and not just barely survive.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
109	Lindsay D. Craig, Renaissance Gold Corporation	Dear Mr. Kreidler I have been in the area of the Pan Gold Deposits numerous times over many years because I am a Nevada based gold exploration geologist and spend much time on the land. I have been aware of the many stages of development an permitting that Midway Gold Corporation's development of these deposits. I consider the efforts of Midway to move towards production as a good thing and the accompanying EIS as mostly a thoughtful and well prepared document. As evidence by the EIS document Midway is on track to protect the environment while creating new wealth that will help fund taxes and jobs. Concerning the EIS, I support the BLM's modified waste rock design, also I support the shortest proposed route for the power line to the project. Concerning the notion that there are a declining number of sage-grouse, I feel there is no valid scientific evidence at this time to quantify such a decline. It is also my observation that wild horses are a destructive invasive species that have had and continue to have a huge negative impacts on the native flora and fauna; I have observed much degradation on Nevada's riparian habitat and the sensitive natural feed caused by horses and it is unfortunate that they are given any protection at all in this EIS. Thank you for your consideration.	POS, SUP- WRDA	Comment noted.

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110	Jed A. Peeler, President of General Dental Products Incorporated	BLM Ely District Office Attn: Miles Kreidler HC Box 33500 Ely, Nevada 89301 Re: Midway Pan Mine I am the Founder and President of General Dental Products, Inc., as well as a former White Pine County Regional Planning Commissioner (8 years). I have been a City of Ely Planning Commissioner for three years. I take a deep interest in all types of projects, business development, and civic projects that improve financial and social conditions in Ely. The Midway Gold Company, through its many presentations and answer sessions in Ely and Eureka, has demonstrated the merits of their Pan Mine project. The creation of 150 jobs, plus another 300 jobs for other projects, is good news for our entire area (Ely, Eureka, and Lund). The tax revenue for White Pine County is badly needed, and the local Ely economy will greatly benefit. Midway's reclamation plan, ongoing even while the mine is operating, is exemplary. I have spoken many times to Mr. Roger Gross about the Pan Mine project. He is an expert in reclamation, and he was able to answer all my questions. I have no reservations about the Pan Mine project. I support it wholeheartedly. Sincerely, Jed A. Peeler	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
111	Becky Rolley	I would like more mining in Nevada.	POS	Statement noted.
112	██████████	Mining is revenue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
113	██████████	Mining means revenue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
114	Lee Epperson Jr	More jobs in Nevada, Mining is Nevada.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
115	██████████	My husband and I have some rentals & I would like to see more people and more jobs and revenue for the county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
116	Lance Burns	I think we need to keep mining going in our community as much as possible. It is our number one employment in our community. Let's work with them instead of against them.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
117	Garline Stevenson	Nevada is mining.	POS	Statement noted.
118	Burton Hilton	I strongly support this project. It will provide immense benefits to the community and county. This county was built on mining, and it is the highest use of the land to benefit humans.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
119	Melody VanCamp	This project will breathe life into our community, employment and already lots of community involvement. There has been lots of time and planning with this project it is a plus.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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120	William Miller	I am in favor of the Midway Gold pan Project. White Pine County relies on business ventures such as this to sustain itself. Residents have been accustomed to this type of industry for over 100 years, welcoming the benefits that definitely outweigh any impacts. Midway Gold's efforts toward mitigations for the Greater sage-grouse should be commended. The measures that they are taking can be utilized as a template for future projects that will use our public lands.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
121	██████████	Mining is good that's what Nev. is all about. Cut the red tape & put people to work to help our communities. I realize we have to abide by regulations. But that process can be simplified & cut the paper work a lot. A fellow miner in Nev.	POS	Statement noted.
122	██████████	I am a long time resident of Ely come from 50 yrs of mining in my family. I've been a bartender for thirty years and would like a change in work force.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
123	Andrew Covert	Plan on moving to Ely, Nevada.	POS	Statement noted.
124	George Chachas	I would like to support the granting of the needed permits and the approval of the final EIS for Midway Gold's Pan Mine Project. In attending some of the local informational hearings held by the Midway Company, I believe their project will be far more beneficial than any possible negative to our community, county, and state. Their proposed mitigations, I believe are reasonable. The City of Ely has been decreasing in population and services for years. The possibility of a new employer and one that will contribute to the existing tax base is greatly needed. The project will create new jobs and opportunities for our communities.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
125	Dan Stevenson	I have been in mining all my life and would like to see it continue.	POS	Statement noted.
126	Greg Madsen	I wish to offer thoughts in support of the Midway Gold-Pan Mine. While mining in general is disruptive to the scenery, landscape and habitat, it is crucial to our collective economic future. I have followed the development of the Pan Mine for over a year. I have concluded that the location is relatively low risk, and that Midway is acting in a conscientious and responsible manner and is committed to minimizing the negative aspects of their mining activity. Therefore, I feel that the necessary permits should be granted to allow for the mine to go forward.	POS	Statement noted.
127	██████████	Because mining is good for Nevada!	POS	Statement noted.
128	██████████	I would like to see more revenue for White Pine County and Nevada. I believe Nevada and mining are one.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
129	Tom Keefhaver	To whom it may concern, I am in favor of Midway Gold. It appears that they have a plan that will minimally impact the environment while having great economic impact for the surrounding communities. Their vision is proactive and responsible and looks to the future of both sides that may be affected.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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130	Teresa Porterfield	Mining is good for Nevada	POS	Statement noted.
131	Debbie Larson	I greatly support the Midway Gold Pan Mine Project. I feel it will be very beneficial to our community! Please move this project forward-the sooner the better!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
132	Randy Larson	I am in support of Midway Gold being granted permission to develop their project! White Pine County and the State of Nevada, and the US Economy need the development of new companies to support the domestic economy. Please move this project forward as soon as possible. Pull out all stops! Regards Randy Larson	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
133	Marty Westland	To Whom it may concern: this letter is written in support of Midway Gold's Pan Mine project. IT is obvious to the most casual observer how important such a project is to a town the size of Ely. 150 mining jobs, along with the "support" jobs that will necessarily follow, represents a very significant economic boost to a town of 4000. However, the environmental impact cannot be ignored. I want to put that concern into perspective. Nevada has a land area of more than 70 million acres. The vast majority of that area is under the diligent stewardship of Federal agencies, and that should be a consolation to anyone concerned with the environment and its wildlife. The Pan Mine is projected to have a total disturbance area of 3200 acres, the largest majority of that which will be reclaimed. If you would, please indulge me in the following analogy: consider this sheet of paper to represent the land area of the State of Nevada. The total disturbance area of the Pan Mine would be hardly larger than the period at the end of this sentence. Yes, "." is fairly accurate. After reclamation, the land area impacted will not be detectable on this paper. To me, that is acceptable price to pay for the livelihood of so many people for so many years. Just drive from Ely to Eureka, through the area where this mine will be. The vastness is striking now, and I am certain will remain so throughout the life of this mine. This mine is truly a place that can accommodate industry and wildlife alike. I urge the decision-makers to let this project proceed. Thank you for your consideration. Sincerely, Marty Westland, Ely City Councilman.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
134	Adam Riches	To Whom It May Concern, I am commenting as an employee of Midway Gold, a member of the board of trustees for the Northwest Mining Association, and an individual who is a strong supporter of both the environment and the economy in rural Nevada. It is well known that the development of hard rock minerals creates new wealth, which is distributed throughout the Nevada and US economies and benefits all levels of our societies. With unemployment in Nevada at 9.7% (http://www.bls.gov/eag/eag.nv.htm), the direct and indirect economic benefits of developing a mine are clear. Local jobs will be added and payroll, property, sales, and net proceed taxes will be paid. I am a strong supporter of the Pan project! Thanks.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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135	Duckwater Shoshone Tribe	The Duckwater Shoshone Tribe submitted a comment letter dated May 10, 2013 that essentially contained identical comments to the Goshute Tribe comment letter (Comment 150). On May 14, 2013, the Duckwater Tribe submitted another letter under the signature of Maurice Frank-Churchill (Comment 298) that provide different comments. On July 2, 2013 the Duckwater Tribe submitted a letter that withdrew their May 10th comment letter in its entirety and asked that their May 14th letter be considered their only comments on the EIS.	GEN	Statement noted. The Goshute Tribe comment letter contains many comments on concerns related to potential impacts to the Duckwater Tribe and Reservation, which were also contained in the May 10th Duckwater Tribe comment letter. The retraction of their May 10th comment letter removes these comments from the official Duckwater Tribe commentary on the Draft EIS.
136	Jim Leavitt, President JDL Resources Inc	The minor environmental impact coupled with the positive economic impact compels me to view this project favorably. The company Midway, the supplier, the residents of White Pine and Eureka counties, all of us residents of the great state of Nevada would benefit if the Pan Mine becomes a reality.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
137	Scott H. Husbands, Attorney Gianoli Husbands PLLC	I am writing to comment on the proposed Midway Gold Pan Mine as a local business owners and attorneys, we are deeply committed to our community and the success of our neighbors. Midway Gold has already played a valuable role in our community by contributing to local charities, supporting the schools and maintaining an active presence in many organizations. If approved, the Pan Mine will bring needed jobs and revenue to the community. These benefits greatly outweigh any potential environmental impact of the mine. I have reviewed the materials available and am very confident that Midway has adequately prepared itself to mitigate the very slight impact the mine would have. On behalf of my family, our business, and the community where we live and rank, I urge you to approve the proposed project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
138	Linda Tokarczyk	I strongly support the Pan Project. The potential employment and economic benefits to the local economy and state make this project vital to the area. Mining jobs are usually "family-wage" jobs-allowing one wage earner to support a family, and those types of jobs are good for families as well as communities. I support the alternative waste rock disposal site in the DEIS, so that potential impacts to sage-grouse habitat are minimized. Regarding sage-grouse management, I urge your agency to mitigate appropriately-based on proven research and common sense principles so that the sage brush ecosystem and the species benefit without unnecessary limitations regarding the project.	POS, SUPP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
139	William D. Worrall, Senior Project Engineer Golder Associates	I wish to express my support for the project because I believe it provides a significant economic benefit with minimal impact. I also wish to state emphatically that choosing the alternative access road route would be a serious mistake bound to result in serious injury. The alternative road and powerline route would present an enormous safety hazard. The route would add 1.5-2 hours round-trip on a road that will see significant heavy vehicle traffic. The addition time commuting is bound to result in a serious accident due to sleep deprivation. The longer commute would mean less time for mine employees to spend with their families	POS, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The Southwest Access Road is not an action alternative evaluated in the EIS.

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		and the first item people will eliminate as a result is sleep. Even if vans or busses are provided to transport personnel to/from the mine the quantity and quality of sleep will suffer. There is a cumulative effect to sleep deprivation making everyone less safe whether driving to/from work, around town or performing task at home. The resulting sleep deprivation will make driving in the Ely & Eureka areas more hazardous in general. I speak from personal experience because my brother suffered a traumatic brain injury in an accident resulting from sleep deprivation. The injury renders him incapable of living on his own. He will live with my parents until they can no longer care for him.. In addition a friend of his was killed and another had his arm severed at the shoulder. I implore that the alternative route not be chosen because I hate to think of the predictable devastation every family is being set up for should it be implemented.		
140	Gregory L Leclaire, Regional Mgr Maxam US, LLC	I am for the "waste rock disposal site design alternative". It makes no sense to have to run the powerline along the 32 mile route. This project brings with it 150 great paying jobs to an area that needs them!!	SUP- WRDA, OPP-SWA	Statement noted.
141	Dan Johnson Engineer Golder Associates	I recently heard that a long (+/- 32 mile) access road to the Midway Gold Pan Project was being considered by the BLM as an alternative to a more direct (+/- 7 mile) route as originally proposed. Please for the sake of the workers, contractors, delivery drivers et al, and their children, spouses, and friends, embrace the shorter and safer route. Indeed, during a safety discussion this week the point was made that an individual working at a mine was more likely to be injured or killed getting to/from the mine rather than at the mine itself. Please minimize risk to the workers & family/friends.	OPP-SWA	The Southwest Access Road is not an action alternative evaluated in the EIS.
142.1	Interior Pacific Southwest Region Fish and Wildlife Service	The U.S. Fish and Wildlife Service (Service) has reviewed the March 8, 2013 Draft Environmental Impact Statement (DEIS) for the Pan Mine Project, which was received by our office on March 21, 2013. The DEIS was prepared for the Bureau of Land Management's (BLM) Egan Field Office by JBR Environmental Consultants, Incorporated. The Pan Mine Project (Project) is located approximately 50 miles west of Ely and 22 miles southeast of Eureka in White Pine County, Nevada. The proposed project is an open-pit gold mine with two larger pits and four smaller pits. The site would also include crushing facilities and stockpiles, two waste rock disposal areas, a heap leach pad and associated conveyors, processing facilities and ponds, water supply wells, haul and access roads, ancillary facilities, and a 69 kV transmission line. Construction, operation, and reclamation of the mine would result in approximately 3,104 acres of new project-related disturbance on BLM-administered public lands. The Service's comments and recommendations on the DEIS are provided below pursuant to the Endangered Species Act of 1973, as amended (ESA; 16 U.S.C. 1531 et seq.);	GEN	Statement noted.

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		Migratory Bird Treaty Act, as amended (MBTA, 16 U.S.C. 703 et seq.); and Bald and Golden Eagle Protection Act, as amended (GEPA 16 U.S.C. 668-668d). Other fish and wildlife resources are considered under the Fish and Wildlife Coordination Act, as amended (48 Stat. 401; 16 U.S.C. 661 et seq.); and the Fish and Wildlife Act of 1956, as amended (70 Stat. 1119; 16 U.S.C. 742a- 742j).		
142.2	Interior Pacific Southwest Region Fish and Wildlife Service	Field Manager: 2.3.6 Processing Ponds and Plant. p.2-37: The DEIS states that "The process ponds would be fenced with eight-foot high chain-link fencing and covered by bird balls, or equivalent, to prevent avian access ... " Equivalent needs to be defined here. For example, if netting is selected for use, then daily monitoring must be conducted to ensure that the netting itself does not result in wildlife mortality.	PA	The words "or equivalent" have been deleted. The ponds will be covered with floating, hollow, High Density Polyethylene (HDPE) bird disks or balls. Netting will not be used.
142.3	Interior Pacific Southwest Region Fish and Wildlife Service	2.3.13 Reclamation Plan. Heap Leach Pad, p, 2-69: The DEIS states that "The pregnant process pond would be converted to an ET [evapotranspiration] cell to store and release heap drain down through ET until de minimus flow is achieved, at which time the ET cell would be closed." If the flow rate at which the ET cell is closed is not defined, then the DEIS needs to state who will have the responsibility to make this decision and on what criteria this decision will be based.	PA	Joint consultation with Midway Gold, NDEP, and BLM would occur re: de minimus flow and closure.
142.4	Interior Pacific Southwest Region Fish and Wildlife Service	2.3.13. Reclamation Plan, Solution Ponds. p. 2-69: Rather than disposing of the synthetic liner in place, this liner (presumably high density polyethylene) needs to be removed and disposed of properly off-site.	PA	Following closure of the ET cell, the dry synthetic liner is planned to be folded over on itself and buried in place. In the event that the liner is required to be disposed off-site for any reason, it must be triple-rinsed prior to being transported to an off-site conventional landfill. The liner can also be removed from the ET cell site and buried in any other lined facility on-site, e.g., buried within an abandoned heap leach pile. Typical final closure of heap leach solution ponds includes the in-place burial of the liner, which is approved by the state regulatory authority.
142.5	Interior Pacific Southwest Region Fish and Wildlife Service	3.8 Wildlife Resources. Including Migratory Birds and Special Status Wildlife, 3-86: The Fish Creek drainage is a bald eagle (<i>Haliaeetus leucocephalus</i>) wintering area and needs to be mentioned in relevant Sections of the DEIS. Like the golden eagle (<i>Aquila chrysaetos</i>), a survey buffer of 10 miles (see comment under Table 5. 1-1) is also required for the bald eagle.	WLF	A statement has been added to the FEIS that identifies the Fish Creek Drainage as a bald eagle wintering area. The 10-mile buffer area has been identified for both bald and golden eagles.

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142.6	Interior Pacific Southwest Region Fish and Wildlife Service	4.2.2 Proposed Action. Operations, Maintenance, and Reclamation. Groundwater', p. 4-10: There are three aquifers of importance at the southern end of Newark Valley that are described in the Affected Environment section of the DEIS (p. 3-5) - a small, perched alluvial aquifer, an extensive valley fill aquifer, and a deep, regional carbonate bedrock aquifer. However, the monitoring plan in the DEIS states that the network of monitoring wells will only monitor the perched and deep bedrock aquifers, not the valley fill aquifer. In the Affected Environment section (p. 3-6), a USGS report is referenced that notes the potential for groundwater flow to occur from the Newark Valley System to Railroad Valley. If the perched aquifer is truly a perched aquifer, the connection between the two systems does not occur in that aquifer. Instead, it will occur in one or both of the other two aquifers. There are several refugium populations of the threatened Railroad Valley Springfish (<i>Crenichthys Nevada</i>) present in Railroad Valley, including one at the northern end of the valley near Duckwater, Nevada. As a result, the Service recommends the monitoring of the valley fill and deep bedrock aquifers and not the small, perched aquifer.	WTR	The perched aquifer that would be monitored is the closest and shallowest aquifer in the vicinity of the heap leach pond. Because of its relative proximity to the heap leach facilities, the perched aquifer would be most at risk if there was leakage from the heap leach facilities. See Figure 2.3-11 for location of the shallow monitoring wells that would monitor this aquifer. The deep bedrock aquifer is the only major aquifer that directly underlies the heap leach facilities and WRDAs, which is why it is proposed to be monitored. Figures 3.2-4 and 3.2-5 show that the valley fill alluvial aquifer is located to the west of the Pan project. Any potential contamination of groundwater from the proposed facilities would be contained in either the perched or carbonate aquifer before reaching the valley fill alluvial aquifer, which is why the groundwater monitoring program is proposed in its current configuration.
142.7	Interior Pacific Southwest Region Fish and Wildlife Service	4.8.2 Proposed Action. Construction. Federally-listed, Proposed. and Candidate Species. Greater Sage-Grouse (p. 4-43 to 45): The reference given for the 3 mile buffer around the project area for project-related noise disturbance on greater sage-grouse (<i>Centrocercus urophasianus</i>) is a habitat map that is not accessible from the web site referenced. The DEIS does not provide any data or reference to support a fixed buffer of any distance.	SSS	Reference to Table 4.8-2 has been corrected.
142.8	Interior Pacific Southwest Region Fish and Wildlife Service	The DEIS states that noise data specific to the Project leks will be collected in spring of 2013 and as a result, an estimated ambient baseline was provided by NDOW and was used for the assessment of noise impacts. An explanation needs to be included in the DEIS that states how this baseline was estimated and what it was based on. If it was based on actual readings, the DEIS should include a table of the actual readings and appropriate descriptions of the conditions in which they were recorded (e.g. ,weather, vegetation type, distance, etc.).	SSS	The FEIS has been updated to reflect this.

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142.9	Interior Pacific Southwest Region Fish and Wildlife Service	<p>The Service does not accept a threshold of 10 A-weighted decibels (dBA) above ambient baseline. Ambient noise levels are what the greater sage-grouse are habituated to. Noise above ambient levels may or may not result in disturbance depending on what the greater sage-grouse will tolerate. That threshold has not been determined and will vary by individual and population (e.g., lek). For instance, leks within proximity to a high use road, etc. are likely to be more tolerant of disturbance or at least certain types of disturbance (e.g., road noise). During the 2013 data collection effort, decibel readings should be recorded in which conditions vary (distance, vegetation type, weather, etc). Monitoring should be done to note changes in behavior of sage-grouse that are present (startling, flushing, etc.) Three activities models were used in the DEIS road construction (40.8 dBA), open-pit mining 25.3 (dBA), and access road travel (29.0 dBA). Notwithstanding this threshold of 10 dBA, all three are projected to be above ambient threshold levels (16.4 to 23 dBA).</p>	M&M	<p>According to Dr. Gail L. Patricelli, Jessica Blickley, and Dr. Stacie L. Hooper, in their work titled "The impacts of noise on greater sage-grouse: A discussion of current management strategies in Wyoming with recommendations for further research and interim protections," they state that "most current noise management strategies limit new noise levels to 10 dB above [an established] ambient value. This 10 dB threshold is used commonly inside and outside of Wyoming core areas and in other states; however, we do not yet know whether this threshold is sufficient to protect greater sage-grouse. This threshold is based on only a handful of studies on songbirds (Wyoming Bird Conservation Plan, 2003; Dooling & Popper 2007), and there is no scientific basis for assuming that sage-grouse will respond to noise in a manner similar to songbirds. Research is needed to determine whether the 10 dB threshold is appropriate for sage-grouse." The discussion goes on to suggest that "we do not yet know whether limiting noise to 10 dB above ambient is appropriate for protecting sage-grouse. However, we recommend continuing to use the 10 dB threshold as an interim measure, combined with appropriate measures of ambient (i.e. 20-22 dBA). This threshold value is based on the best available science to date, but should be revised as needed when better information becomes available."</p> <p>Based on this recommendation, appropriate ambient baseline monitoring was conducted Ambient baseline noise monitoring was conducted in May of 2013 nearby each of the two lek sites, which incorporated the varying conditions at each site. Collected data, along with the subsequent impact analysis summary, will be included in the FEIS. The modeled impacts for each of the three scenarios at the two lek sites are below the baseline +10 dBA impact threshold.</p>

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142.10	Interior Pacific Southwest Region Fish and Wildlife Service	4.8.2 Proposed Action, Construction. BLM Sensitive Species and State of Nevada Protected Species, Migratory Birds (p. 4-47): The proposed action will include the removal of 3,204 acres of vegetation, 452 acres of which will represent permanent (vegetation removal p. 4-33). Reclamation activities will start once mining activities are completed (estimation of 13 years post mining). Reclamation is estimated to take an additional 15 years for a total of 28 years (p. 4-7). The DEIS states that in the short-term vegetation would consist primarily of grasses. In the long term, native shrubs and pinyon pine and juniper would increase with time but could take many years to become established (p. 4-34). Native shrub habitats take > 20 years to establish after reclamation activities are completed and pinyon pine and juniper habitats generally take an additional 20 - 30 years to establish (reviewed in Knick et al. 2005). Therefore the impacts to migratory birds in the project area are not short-term, but are rather likely to extend across numerous generations depending on the bird species.	WLF	Language has been changed to "long-term." See response to comment 15.14.
142.11	Interior Pacific Southwest Region Fish and Wildlife Service	4.8.2.1 Mitigation. Golden Eagle, p. 4-55: In order to minimize raptor electrocutions and collision potential, power transmission lines should be designed and constructed with Avian Powerline Interaction Committee guidelines. Please ensure that the updated reference: "Reducing Avian Collisions with Power Lines: State of the Art in 2012" (http://www.aplic.org) is included in the Bird and Bat Conservation Strategy (BBCS).	M&M	The APLIC 2006 reference deals primarily with electrocution while the 2012 deals with collisions. The references have been changed accordingly.
142.12	Interior Pacific Southwest Region Fish and Wildlife Service	5.1 Cumulative Effects. Introduction. p. 5-2: The Service disagrees with the omission of migratory birds as part of the cumulative effects analysis. The Project encompasses and will displace migratory birds from a large area (3,204 acres) of which 452 will be permanently lost as suitable migratory bird habitat. The life of the mine, including reclamation activities, is estimated at 28 years (p. 4-7). This time estimate plus time for vegetation (other than grasses) to re-establish is not a short-term prospect, especially for bird species dependent on pinyon-juniper.	WLF	Impact determination has been changed to long-term and negligible and analyzed under impacts in Chapter 4 and cumulative effects in Chapter 5.
142.13	Interior Pacific Southwest Region Fish and Wildlife Service	On p. 4-53, the DEIS states that " ... implementation of the BBCS ... would greatly reduce the likelihood of migratory bird nesting behavior being disrupted or nests being destroyed." This statement implies that some impacts to migratory birds may result from proposed Project activities. This fact, plus the long-term impacts discussed above, needs to be incorporated into a cumulative impacts analysis in addition to the impacts from other past, present, or reasonably foreseeable future actions.	CE	The potential impacts to migratory birds would include the long-term loss of approximately 452 acres of potentially suitable nesting and foraging habitat. However, the losses are expected to have little effect on local bird populations based on the amount of similar suitable foraging and nesting habitat in the surrounding area. Pre-construction surveys would identify nesting migratory birds and nest buffers and/or timing restrictions until fledging occurs would preclude impacts to nesting migratory birds. Migratory birds moving into the vicinity of the project would either displace

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				into the vast, suitable, adjacent habitat or become habituated to project activities.
142.14	Interior Pacific Southwest Region Fish and Wildlife Service	Table 5.1 -1 Cumulative Effects Study Area by Resource, p. 5-2: Survey requirements for golden eagles have changed since the Service was consulted in 2010 (USFWS <i>In litt.</i> , 2010; our File No. 2010-SL-0281). The Service's Pacific Southwest Regional Office Migratory Bird Program (RMBP) is now requiring surveys up to 10 miles for large scale production mines. Chris Nicolai with the RMBP has been in contact with Josh Vittori of JBR Consultants regarding these changes. The cumulative affects section (5.10, p.5-49) will need to be expanded to include the additional area for analysis, pursuant to input submitted by Chris Nicolai on behalf of the RMBP.	CE	The cumulative effects section has been updated to include a 10-mile buffer.
142.15	Interior Pacific Southwest Region Fish and Wildlife Service	The population management unit (PMU) is not the appropriate level of analysis for the greater sage-grouse. Analyzing effects at the PMU scale will mask any effects on the leks in the vicinity of the project as demonstrated in the first paragraph in Section 5.10.5 under Cumulative Disturbances. A 4 mile buffer around each of the two active leks should be shown on Figure 4.8-1 and the percentage of both preliminary priority habitat and preliminary general habitat impacted from the proposed action should be calculated. A discussion from this analysis should be included where appropriate within the DEIS. The Service recommends a buffer of 4 miles for two reasons: (1) when studying natural gas field development in western Wyoming, Holloran (2005) found that development within < 4 miles of leks resulted in decreasing counts of displaying males; and (2) a 4-mile buffer protects approximately eighty percent of nesting hens (e.g., Hagen 2011).	CE	This method assumes 80% of nests are within 4 miles of the leks. Currently the EIS analyzes impacts to all PPH, PGH, and the leks from the proposed action and action alternatives. The portions of the project that disturbs PPH or PGH is within 4 miles of the leks and therefore the disturbance acreage within the 4 mile buffer would be the same as the currently calculated disturbance. The BLM believes that using the refined PPH and PGH information (as updated in chapter 4) is more accurate in identifying impacts since the sage-grouse may nest more than 4 miles from a lek if that is where the preferred habitat is. If it is assumed that the sage-grouse are using PPH or PGH for nesting, then most of the land to the northwest and southwest of the East Blackpoint lek is not being used for nesting. This either means the sage-grouse are nesting only to the east or they are nesting further than 4 miles from the lek. Pete Coates of USGS is conducting an ongoing monitoring/mitigation study that will determine where the sage-grouse are nesting from the nearby leks.

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142.16	Interior Pacific Southwest Region Fish and Wildlife Service	Table 5.1-3 Past, Present and Reasonably Foreseeable Future Actions for the Pan Mine Project Cumulative Effects Study Area, p. 5-6: The area proposed for the Gibellini Mine needs to be expanded. The exploration activities for this proposed vanadium mine have already been conducted. The NEPA process for this site has been initiated. Therefore, the operations, maintenance and reclamation activities for this mine should be considered in the reasonably foreseeable future actions for the Pan Mine Project and should therefore be included in the cumulative effects analysis. The proposed alternate power line corridor for the Pan Mine Project is the same as the proposed power line corridor for the Gibellini Mine Project.	CE	According to the American Vanadium Gibellini Project POO submitted to the Battle Mountain District BLM, proposed disturbance, for the Gibellini Mine is 730 acres. The Gibellini Mine has been included in the reasonably foreseeable future actions in Chapter 5 of the FEIS.
142.17	Interior Pacific Southwest Region Fish and Wildlife Service	5.10 Wildlife Resources, Including Special Status Wildlife, and Migratory Birds, p. 5-49: This section currently combines general wildlife and the golden eagle in one species group and the greater sage-grouse into a second species group. The style in which the cumulative effects analysis is written, in combination with the inappropriate scale of analysis for the greater sage-grouse, results in confusion regarding the outcome of the cumulative effects analysis for each of the two species groups. Both of these two species groups need to be split into two separate cumulative effects study areas (CESA) in order to conduct an accurate cumulative effects analysis. (See additional comments above under Table 5.1-1 Cumulative Effects Study Area by Resource, p. 5-2.)	CE	This has been revised in the FEIS.
142.18	Interior Pacific Southwest Region Fish and Wildlife Service	5.10 Wildlife Resources, Including Special Status Wildlife and Migratory Birds. p. 5-52 to 54: The following statement (or variations of it) appears multiple times in this section (e.g., p.S-52) "Fragmentation effects within the 5-mile buffer have not been quantified by the land management agencies as quantification is very difficult." An accurate cumulative effects analysis cannot be done without at least a basic quantification. Splitting out the cumulative effects analysis into two different sections, one for general wildlife and golden eagles and the second exclusively for greater sage-grouse should assist with this process. Please again note our prior comment regarding an expanded buffer of 10 miles for the golden eagle.	CE	This has been revised in the FEIS.

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142.19	Interior Pacific Southwest Region Fish and Wildlife Service	On p. 5-52, the DEIS states "Past and present disturbances from oil gas and geothermal development activities as well as other utility line activities ... would likely result in minor and temporary impacts. There is no justification for this determination in the DEIS. There are a number of maps in the DEIS, but none depicting a species specific CESA (e.g., greater sage-grouse) incorporating past, present and reasonably foreseeable future actions. In addition to splitting out the greater sage-grouse into its own CESA, the Service requests that the CESA be re-analyzed and limited to the area within 4 miles of each of the two active leks. Knick and his colleagues (2013) found that only a small increase in disturbance can result in a negative impact to a lek. As a result, the Service has concerns that the proposed project may result in the two active leks being abandoned.	CE	Chapter 5 of the FEIS separates out general wildlife and golden eagles as one discussion and greater sage-grouse as another. However, greater sage-grouse has its own CESA (Figure 5.10-1), which consists of the two PMU's, which the project falls within at 3,657,236 acres, which sufficiently expands beyond the four-mile buffer for each of the two active leks.
142.20	Interior Pacific Southwest Region Fish and Wildlife Service	Table 5.1-3 Past, Present and Reasonably Foreseeable Future Actions for the Pan Mine Project Cumulative Effects Study Area, p. 5-6: The acres for wildland fires need to be included in the general wildlife and golden eagles category. Currently, all the acres burned are combined into one total under the "wildland fires, designation, although the actual total acres burned assigned to each CESA (e.g., general wildlife and golden eagle)~ as shown in the table, vary due to the variations in area in each CESA. Instead of combining all burned acres under one category, split out the number of acres by each fire season (e.g., 2005, 2006, etc.) or short interval (e.g., 2006- 2008) into its own category. This would accomplish two things: (1) assist with quantifying fragmentation within each CESA; (2) provide an indicator of vegetation type based on age (e.g., grass/forb, shrub, etc) and subsequent habitat value depending on the species under discussion.	CE	Note that in Table 5.1-1 the "" means there were no fires within the general wildlife and golden eagles CESA. The acres by each fire season have been split out in the FEIS. The analysis of wildland fires shows no fires within the general wildlife and golden eagles category. The analysis has been re-run based on the new 10-mile buffer for golden eagles. Fires have been broken out by year on Table 5.1-1, however, not discuss by individual fire years within the text for each resource. Breaking out the fires by year for the resources, does not achieve any difference in cumulative effects.
142.21	Interior Pacific Southwest Region Fish and Wildlife Service	5.10.5 and 5.10.6 Cumulative Disturbances and Effects, General Wildlife and Golden Eagles and Greater Sage-Grouse, p. 5-54 to 55: The two sections- Cumulative Disturbances and Cumulative Effects - need to be combined for each of the two CESAs, one for general wildlife and golden eagles and the second exclusively for greater sage-grouse. The Cumulative Effects section, as it stands now, is just a series of summary statements. For example, on p. 5-55, the DEIS states "Cumulative effects to greater sage-grouse are expected to be long-term and moderate for activities associated with the Proposed Action." However, there are no explanations given as to how this determination was made and what information it was based on. The Service recommends combining these two sections to more clearly define the reasoning for each determination.	CE	Cumulative Disturbances and Cumulative Effects are separated consistently throughout Chapter 5. To remain consistent, general wildlife and golden eagles are separated out from the sage-grouse discussion. 5.10 Determinations in the Cumulative Effects section are based on the summary for the entire Section 5.10. Explanations of a determination has been inserted into Section 5.10.

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142.22	Interior Pacific Southwest Region Fish and Wildlife Service	We appreciate the opportunity to comment on this DEIS. Please contact me or Kerensa King at (775) 861-6300 if you have any questions.	GEN	Statement noted.
142.23	Interior Pacific Southwest Region Fish and Wildlife Service	<p>Literature Cited</p> <p>Ilagan, C. 2011. Greater sage-grouse conservation assessment and strategy for Oregon: a plan to maintain and enhance populations and habitats. Oregon Department of Fish and Wildlife, Portland, Oregon, USA.</p> <p>Holloran, M.J. 2005. Greater sage-grouse (<i>Centrocercus urophasianus</i>) population response to natural gas field development in western Wyoming. Dissertation, Department of Zoology and Physiology, University of Wyoming, Laramie, Wyoming.</p> <p>Knick, S.T., A.L. Holmes, and R.F. Miller. 2005. The role of fire in structuring sagebrush habitats and bird communities. <i>Studies in Avian Biology</i> 30:1-13.</p> <p>Knick, S.T., S.E. Hanser, and K.L. Preston. 2013. Modeling ecological minimum requirements for distribution of greater sage-grouse leks: implications for population connectivity across their western range, U.S.A. <i>Ecology and Evolution</i>. Correspondence</p> <p>U.S. Fish and Wildlife Service. 2010. Nevada Fish and Wildlife Office, Reno, Nevada. Letter from Robert Williams, State Supervisor, to Ms. Kendra Olcott of JBR Environmental Consultants, Incorporated. Subject: Species List Request for Midway Gold Corp - Pan Project, File No. 2010-SL-028. Date: May 5, 2010.</p>	GEN	Statement noted.
143.1	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>Comment Number 143 is supplemental information provided by Eureka County Board of Commissioners: Eureka County has raised a number of issues and concerns regarding the June 2, 2008 Mount Hope Project Socioeconomic Assessment prepared by Blankenship Consulting LLC and Sammons/Dutton LLC (the socioeconomic assessment). This memo summarizes the process and results of efforts taken in consultation with Abby Johnson and Rex Massey, consultants to the Eureka County NEPA Committee, to address five areas of those concerns.</p> <ol style="list-style-type: none"> 1. Mount Hope-related population estimates 2. The characterization of the southern Eureka County economy 3. The description of the Eureka utility infrastructure and existing deficiencies 4. The effects of the Mount Hope Project on the existing Whiskey Flats landfill 5. The assessment and portrayal of the fiscal conditions and potential effects of the project <p>The individuals identified above worked cooperatively to reach mutually acceptable understandings and resolutions to items #1 through #4. The results of those efforts are presented below. With regard to Item # 5, the group was unable</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.

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		<p>to achieve a similar level of agreement. Consequently, we understand that Eureka County intends to submit additional information on fiscal impacts identified in their report, Eureka County Fiscal Impact Review and Analysis of the Mt. Hope Project (Research and Consulting Services, Inc., December 2008) for the BLM's consideration in the NEPA process. Item # 5 in this memo summarizes the findings of the County's fiscal assessment and identifies our general concerns associated with some of those findings.</p> <p>Mount Hope-related population estimates: Eureka County noted the uncertainties that exist with respect to the Mount Hope Project operations phase resident population projections and some of the household size, employee per household and school age children per household factors used in the socioeconomic assessment. The socioeconomic assessment assumed that 35 percent of the Mount Hope operations workforce would be comprised of households relocating to southern Eureka County and the remainder of the workforce would be comprised of daily and weekly commuters and local hires. The County expressed an interest in assessing the population effects of relocating households comprising a range of 30 to 50 percent of the operations workers. Eureka County also expressed concern about the assumption in the socioeconomic assessment that jobs in the local economy vacated by workers who chose to work at the mine would be filled by increases in labor force participation and the resulting expansion of the local labor force, given the current limited labor availability within the county. In response to these concerns, a review of the demographic and household assessment factors was conducted in consultation with the County's consultants and a series of sensitivity analyses (SA) were performed to assess the potential effects on total resident population and school age children of alternative demographic factors and residency assumptions. Per the consensus among the group, the sensitivity analyses focused on the operational phases of the project. The information presented below supplements section 3.2 Population of the socioeconomic assessment, focusing on subsection 3.2.2 Operations Phase Population and subsection 3.2.3 School Enrollment. Table 1 below summarizes the results of the sensitivity analyses and the following tables provide additional detail about each specific scenario developed as part of the sensitivity analysis process. In all, three scenarios were developed to bound the range of population and school enrollment effects that might reasonably be expected to occur. The population and school enrollment projections contained in the June 2, 2008 Final Mount Hope Socioeconomic Assessment (the socioeconomic assessment) submitted to the BLM are presented as the Base Case, to provide a point of comparison for the sensitivity analyses. The changes in assumptions associated with each sensitivity analysis scenario, include the following:</p>		

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143.2	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>SA 1. Modified Base Case – Infill: SA 1 assumes the share of secondary jobs filled by relocating households would be 50% and the share filled by spouses/partners would be 45% compared to 45% and 50% respectively in the socioeconomic assessment. This analysis also assumes that existing local jobs assumed to be vacated by workers who accept jobs at the mine would be filled by additional relocating worker households. Infill jobs are not accounted for in the Base Case scenario. Consistent with the socioeconomic assessment and other sensitivity analyses, SA 1 assumes an average of 1.3 jobs per relocating household. Because these relocating households are not expected to fill jobs directly associated with the mine, but rather fill other jobs in the local economy, SA 1 assumes an average household size mid-way between that used for the direct households and those associated with new indirect/induced jobs. Finally, the projected number of mine-related school-age children in Eureka County during operations is presented as a range of 20% to 23% of the permanent resident population; a change from the 16% of combined resident and weekly commuting population assumed in the Base Case. The allocation of students between elementary and middle/high school students is also presented as a range; 50% to 70% elementary and 50% to 30% for middle/high school, a change from the 70%/30% assumption in the Base Case.</p> <p>SA 2. 30 Percent Relocating Households: This analysis assumes that 30 percent of Mount Hope operations workers would relocate to Eureka County; compared to the 35 percent assumed in the socioeconomic assessment. All other population and household factors remain the same as those used in the socioeconomic assessment, except that the SA 2 scenario incorporates the same ranges of assumptions associated with school-age children described for SA 1 above. SA 2 provides the lower bound of population effects for the sensitivity analyses.</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.
143.3	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>SA 3. 50 Percent Relocating Households: This scenario assumes that 50 percent of Mount Hope operations workers would relocate to Eureka County; compared to the 35 percent assumed in the socioeconomic assessment. It also assumes that all jobs vacated by existing local employees who accept employment at the mine would be filled by additional relocating worker households. SA 3 assumes that: the average operations worker persons per household (PPH) would be 2.85 compared to 2.64 in the socioeconomic assessment; the percentage of secondary jobs filled by relocation households would be 35% compared to 45% in the socioeconomic assessment to reflect the substantial increase in second workers associated with the increased number of direct worker relocations; and, the average persons per household (PPH) for relocating households filling secondary jobs would be 2.01 compared to 1.90 in the socioeconomic assessment. The SA3 scenario incorporates the same ranges of assumptions associated with school-age children described for SA 1 above. SA 3 provides the upper bound of population effects for the sensitivity analyses. Table 1 on the</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.

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		<p>following page summarizes the key results of the sensitivity analyses, presenting comparative projections associated with different operational phases of the mine in a series of columns. The summary table is followed by more detailed tables showing the derivation of the results for each scenario. The primary focus of the sensitivity analysis results is the column labeled "Full Production (Yrs. 1 – 10)". That column represents the potential impacts during the first ten years of operations, a period when the mine would achieve and maintain full production, creating long-term steady job opportunities conducive to household relocation, and to the creation of indirect and induced jobs in the community. As shown, the range of long-term projected population effects range from 584 to 795 residents, including weekly commuters, with a corresponding increase of between 83 and 161 school age children. The corresponding range of effects during peak production, which is not anticipated to occur for more than two decades, is from 719 to 974 residents and between 103 and 198 school-age children. One of the County's objectives in promoting the sensitivity analysis was to identify a range of potential population effects for long-term community planning purposes. Based upon recent demographic research, there appears to be a higher likelihood that the Mount Hope-related population growth and school enrollment effects would be closer to those associated with the Base Case or SA 1 than the lower or higher bound scenarios (SA2 or SA 3). Note that the difference in county staff required to serve the relocating populations of either the high (SA2) or low (SA 3) population range would be relatively small and the difference in county equipment and infrastructure improvements needed to serve the population associated with either scenario would be similar to that required for the Base Case or Modified Base Case (SA 1). Also note that although the Eureka County School District would need additional teachers to serve the incremental enrollment associated with the higher bound scenario (SA 3), the district's elementary and middle/high school facilities would be able to accommodate the projected incremental growth associated with all scenarios during all phases of the project, although the enrollment associated with the high end of the range for the highest bound scenario (SA 3) would exceed the optimum but not the maximum capacity of the middle/high school facility. Eureka County feels that the baseline report describes Eureka as more of a "boom and bust" mining community like Battle Mountain, than a "quieter agricultural community," and they would like to see that description changed.</p>		

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143.4	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>2.2 Social and Economic Setting Eureka County is the second least populous county in Nevada with a 2006 estimated population of 1,460 (Nevada State Demographer 2007) and a 2005 resident population density of 0.35 persons per square mile. The unincorporated town of Eureka, the county seat and largest community in the county, is located in the southern portion of the county. The communities of Beowawe and Crescent Valley are located in the northwestern portion of the county. Farm and ranch households reside on agricultural operations throughout the county (Eureka County 2006a). The town of Eureka initially developed in conjunction with the mining industry, but has been sustained through the years by the agricultural industry. Although there have been good and bad years, agriculture, principally alfalfa and hay farming, cattle ranching, and to a lesser extent sheep ranching, have historically provided a relatively stable base for the Eureka County economy. The history of farming in Eureka County is described in the Land Use element of the Eureka County Master Plan as follows. Development of the mines brought sheepmen, cattlemen and other settlers who settled in the valleys in Eureka County. Government land programs, including the 1877 Desert Lands Act, the Act of 1888, the Act of 1890, the 1891 Creative Act, and the 1916 Stock Raising Homestead Act, established privately-owned base properties to support permanent range livestock operations and farms. Farming was limited to native sub-irrigated meadows and lands irrigated by diverted surface water until supplemental flowing wells were drilled on the Romano Ranch in 1948 and the Flynn Ranch in 1949. In 1949 two irrigation wells were drilled in Diamond Valley in an effort to develop land under Desert Land Entry. By the mid 1950s, pumped irrigation wells were being developed in southern Diamond Valley, Crescent Valley and Pine Valley. By 1965, some 200 irrigation wells had been drilled in Diamond Valley alone. Today, Eureka County's farming districts support a robust grass, alfalfa and meadow hay industry (Eureka County 2006a). European settlement of the area around Eureka began with the discovery of silver-lead deposits near the present town site in the 1860s. Improvements in smelting processes led to a mining boom in the county. By 1878, Eureka was the state's second largest city with a population of over 7,000 and a railroad that connected the town with Palisade to the north. As ore bodies played out Eureka lost most of its population, although mining activity continued around Eureka through the latter part of the 1800s and up until about 1920. From that time until the late 1980s when the Atlas Gold Bar mine began operations, little mining activity occurred in southern Eureka County.</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.
143.5	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>Mining currently plays a large, yet complex role in the economy and culture of Eureka County. The two largest gold mining operations in the state, Barrick Goldstrike's Betze/Post Mine and Newmont Mining's Carlin Trend Complex, are located in northern Eureka County, yet most of the economic activity associated with these mines accrues to Elko County, which is also home to most of the</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.

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		<p>employees. Mining again became a major economic influence in southern Eureka County in 1997 with the development of the Ruby Hill mine adjacent to the Town of Eureka. However, population related impacts were somewhat limited because a number of local residents were able to secure jobs at the mine. Southern Eureka County experienced an economic and population contraction when the Ruby Hill mine ceased mining in 2002 and experienced a modest economic surge when the East Archimedes expansion of the Ruby Hill mine opened in 2006. Economic and social conditions in Eureka County have also been affected indirectly by mining development in the northern part of the county, which has occurred for over 50 years and began to accelerate during the mid 1980s. The tax revenues that Eureka County and the Eureka County School District have received from the mines in the northern part of the County have allowed the County and the School District to construct new facilities and expand public services throughout the county including the communities of Eureka and Crescent Valley. The influence of the mining revenues from the northern part of the county are reflected in levels of employment, local government spending for goods and services, and county and school district service provision that are higher than would be available without the tax revenues from the northern mines. Along with agriculture and mining, the legacy of mining's early glory now forms the basis for an emerging third facet of Eureka's economy; a tourism and recreation industry supported by historic attractions, restored buildings and the area's striking natural setting. As demonstrated by the foregoing, the economy of Eureka County is natural resource based. Farming, ranching, mining and tourism/recreation all rely on the land and its resources. The traditional uses of these resources complement each other for the most part. Farming and ranching provide a stable population base and support a basic level of local commerce. Mining in the north and periodic surges in mining development in the southern part of the county provide economic activity and local government revenue, which the county has used to upgrade public infrastructure and restore historic buildings and streetscapes. This restoration coupled with the scenic setting and recreation resources have attracted tourists, which in turn, support commercial infrastructure and provide a modest level of local government sales tax revenue. Although residents are interested in economic development, the increasing urbanization occurring elsewhere in the state, increased environmental and land use regulation by federal land management agencies and the social, economic dislocation and other costs of the bust side of mining booms have "galvanized (Eureka County) residents and their elected representatives to seek mechanisms to manage growth and influence resource management." The county considers these actions "necessary to maintain and enhance local economic security and the rural quality of life which has long typified Eureka County" (Eureka County Economic Development Council 2006).</p>		

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143.6	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>Additionally, we suggest that section 2.3.1 Employment of the socioeconomic assessment should be clarified as follows: • The first sentence of the first paragraph under section 2.3.1 should be replaced by the following sentence: As might be expected, mining dominates the northern Eureka County economy in terms of employment and earnings. This dominance is reflected in the Eureka County employment by place of work statistics, but not in the employment by place of residence statistics discussed in section 2.3.2, which are more reflective of the much smaller and more recent mining presence in southern Eureka County.” • The first sentence of the second paragraph under section 2.3.1 should be amended to read: “During the peak employment year of 1997, total employment reached 5,321, driven by record high mining employment of 4,374, which included the startup operations for the Ruby Hill mine in southern Eureka County, although that mine accounted for less than three percent of total mining jobs in Eureka County that year.” • The third sentence in the second paragraph under section 2.3.1 should be amended to read: Mining employment subsequently fell to 2,903 in 2004.” • The last sentence in the second paragraph under section 2.3.1 should be deleted. • The paragraph immediately following Figure 3 on page 9 should be moved up to follow the second paragraph under section 2.3.1 Employment. • The following sentence should be added to the end of the first footnote under Table 3. The vast majority of these mining jobs have been located at mines in the northern part of Eureka County.” 3. Eureka County is uncomfortable with the description of the Eureka utility infrastructure in terms of the description of existing deficiencies. In response to this concern, we offer the following supplement to the socioeconomic study. This information would supplement section 3.4.8 Community Infrastructure/Public Works Department on page 62. Specifically, the following paragraph should be inserted as a third paragraph following the existing two paragraphs at the beginning of section 3.4.8. Although the Master Plan for the Town of Eureka Water and Sewer Systems and Devil’s Gate GID (District 1 & 2) Water Systems identifies a number of existing deficiencies, not all of the improvements identified to correct these deficiencies would have to be implemented immediately. These identified improvements to the existing system would also be necessary to serve new population demands. According to County officials, the Town of Eureka water and sewer systems are largely adequate for the demand they presently serve and are not under any regulatory requirements for improvements. The Devil’s Gate GID District 2 is deficient in compliance with the Arsenic Rule. The GID board is in the process of making necessary improvements to bring the present system into compliance.</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.

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143.7	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<p>4. Eureka County would like an expanded discussion of the effects of the Mount Hope Project on the County's Whiskey Flats Landfill. To address this concern, we offer the following supplement to the socioeconomic study. This information references section 3.4.8 Community Infrastructure and Services, subsection Solid Waste Disposal on page 63. Specifically, we suggest that the first paragraph in the Solid Waste Disposal subsection be restated as follows. Demand from the population associated with the Mount Hope Project will reduce the remaining life of the Class II-rated (less than 20-tons per day) Whiskey Flat landfill, but the landfill capacity should be adequate through construction and much of the project's initial operations period. The anticipated increase in Eureka County population associated with the Mount Hope Project during the first 20 years would be about 40 to 45 percent of Eureka County's 2007 population. It is important to note that the Whiskey Flat landfill serves all areas of Eureka County's population, either through waste collection services or directly. With the expansion of the Mount Hope residential subdivision, regular solid waste collection will increase substantially. Additionally, waste from the Mount Hope subdivision construction will also utilize capacity in the landfill. Consequently, assuming similar rates of solid waste generation, the project would shorten the anticipated 30 years of remaining land fill life to just over 20 years. Additional operating staff and/or equipment may be necessary to accommodate the increased volumes of solid waste.</p> <p>5. Eureka County is concerned about the extent to which local government expenditures were identified and described in the socioeconomic assessment. Eureka County is uncomfortable with the way the Socioeconomic Assessment portrays County fiscal conditions and believes the assessment portrays the county as having "lots of money and can just fix any impacts." Eureka County has developed preliminary cost estimates to meet the service demands associated with projected Mount Hope-related population growth. (Eureka County Fiscal Impact Review and Analysis of the Mt. Hope Project, Research and Consulting Services, Inc., December 2008). The County's analysis outlines the incremental increases in Eureka County government employees, operational expenses and capital improvements to address direct and indirect impacts of the Mt. Hope Project. Generally, the estimated needs are based on the projected population growth when the project is at full production. The County's fiscal assessment provides estimates of additional staffing requirements and associated operating costs, based on the judgment of County service administrators. The County's fiscal assessment estimates incremental staff needs of as many as 24 full-time equivalent employees. Eureka County's fiscal assessment estimates gross annual operating costs, a large portion of which would be the payroll costs associated with staff, at just over \$2.0 million. The total does not include any additional costs that could be associated with operations of the local health clinic, but neither does</p>	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.

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		<p>it reflect allowances for increased revenues derived from services. The fiscal assessment notes that the water system operating costs could increase substantially if arsenic treatment is required for new water sources. The operating costs are largely variable and could change based upon the actual impacts on service demands and future decisions regarding levels of service by the Board of Eureka County Commissioners. Eureka County's fiscal assessment outlined a number of capital improvements required to address estimated service demands related to population growth from the proposed Mount Hope Project. The combined costs of those improvements are estimated at about \$7.2 million. Some of these costs would occur prior to, or concurrently with, project construction, others would occur later in time as the project operations continue. The major capital expenditure estimates developed by Eureka County are summarized below and are separated into two groups; those improvements supported by general revenue sources and those capital costs associated with utility operations that are supported largely by revenues collected from system users.</p>		
143.8	George Blankenship & Ron Dutton, Blankenship Consulting LLC	<ul style="list-style-type: none"> • Capital Costs-General Revenue Sources Jail Expansion \$1,500,000 Adm. Improvements-Sheriff's Office \$ 750,000 Landfill Capacity \$ 720,000 Major Equipment \$ 860,000 Other Improvements and Equipment \$ 150,000 Total \$3,980,000 <p>Eureka County's fiscal assessment noted that recreation related impacts and those associated with local street and highway improvements are unknown.</p> <ul style="list-style-type: none"> • Capital Costs-Funded By Users <p>The County's fiscal assessment allocated the following costs to the Mount Hope Project-related population based on projected population impacts.</p> <ul style="list-style-type: none"> Wastewater Treatment Capacity \$ 969,500 Allocated Water Storage Capacity \$ 990,345 Pump Station-Water System \$ 315,000 Outfall Pipe-Wastewater Treatment \$ 777,600 Effluent Disposal-RIBS \$ 200,000 Total Costs \$3,252,445 	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.

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143.9	George Blankenship & Ron Dutton, Blankenship Consulting LLC	Regarding Eureka County's concerns with the fiscal section of the socioeconomic study, we offer the following. Eureka County's fiscal impact estimates contain a number of major improvements that the County believes are required to accommodate mine related growth. County services and staffing could also increase substantially as a result of mine related development. However, some of the items identified in the County's fiscal assessment may in part address existing needs or provide higher levels of services to current residents of the community. Others would likely be funded at least in part by developers or by user fees. Moreover, it is possible that more detailed studies and continued cooperative efforts between GMI and the County could identify alternative approaches or reduce the costs to meet some of the County's identified needs. Eureka County's fiscal assessment was limited to potential County expenditures associated with Mount Hope Project demand. However, as noted in the socioeconomic assessment, the Mount Hope Mine will generate an estimated \$9.5 million in Basic and Supplemental City-County Relief tax (sales and use tax) revenues during the construction phase of the project that would effectively defray the County's initial capital costs. Over the long term, the estimates of projected on-going revenues from ad valorem and sales and use taxes of over \$1.9 million annually, combined with even a modest amount of revenue from net proceeds of mining taxes from the mine, would be sufficient to offset the County's estimates of operating costs. Finally, we reiterate the statement contained in section 3.6.2 of the socioeconomic assessment It is anticipated that GMI and Eureka County will work cooperatively to identify and quantify specific staff, equipment and capital needs to accommodate the project-related demand."	SOC	Supplemental information provided by Eureka County Board of Commissioners has been reviewed and additional impact analysis has been added to the FEIS.
144.1	NATIONAL PARK SERVICE Pacific West Regional Office	Revised National Park Service submittal: Thank you for the opportunity to review the Draft Environmental Impact Statement for the proposed Pan Mine which would be located on BLM-administered lands in White Pine County, Nevada. These comments replace our comments sent on May 3, 2013. Midway Gold, U.S., Incorporated proposes an open-pit gold mine about 50 miles west of Ely, which would consist of two primary open pits, four satellite pits, one heap leach pad and two rock disposal areas. The total surface disturbance would be approximately 3,204 acres. The environmental impact analysis is based on a proposed 13 year mining period, with associated construction, closure, reclamation and post-closure monitoring periods extending the project life to approximately 25 years. No comments were received from any other National Park Service office, nor any other agency. Our comments and concerns are categorized as follows:	GEN	Statement noted.

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144.2	NATIONAL PARK SERVICE Pacific West Regional Office	Cultural Resources and Tribal Consultations : Appropriate background research and "Class III" archaeological surveys were conducted within the Area of Potential Effects (APE) but do not include the transmission line corridor of the SW line alternative and the unidentified reroute area of the Lincoln Highway. Additional archaeological survey should be completed.	CR	It is stated in the EIS that "If the Southwest Powerline Alternative is selected, cultural resource surveys would be conducted prior to construction and appropriate mitigation measures would be implemented." If the Southwest Powerline Alternative is chosen, then an inventory would be done and Section 106 protocol will be followed for the Lincoln Highway reroute.
144.3	NATIONAL PARK SERVICE Pacific West Regional Office	In addition, we recommend that the potential for an archaeological district be considered for National Register eligible sites, including any individually ineligible sites that contribute to the district.	CR	The SHPO and BLM archaeologists have reviewed the cultural resources data for the project and are familiar with the cultural resources in the area. An archaeological district is not currently being considered.
144.4	NATIONAL PARK SERVICE Pacific West Regional Office	Most of the APE has been surveyed for archaeological resources. However, it is unclear if other cultural resources, such as historic sites, buildings and structures, ethnographic sites, and traditional cultural properties, were adequately covered or if they will be, and whether individuals who meet the Professional Qualifications Standards of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation were, or will be, directing the inventory and evaluation efforts. Please clarify.	CR	Prior to conducting the cultural resource inventory, archaeological record searches were conducted at the appropriate agency offices, including the Nevada State Museum. Archival information from sources such as GLO plat maps, land patent records, and other sources were also consulted. Further, BLM provided information regarding known and potential sites and resources. In order to be permitted to conduct cultural resource inventories on BLM lands, the contractor must meet the Professional Qualifications Standards of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. The cultural resource contractors, Don Zerga and later, the Chambers Group, meet these standards.

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144.5	NATIONAL PARK SERVICE Pacific West Regional Office	In §3.12, "Native American Religious and Traditional Values", it is stated "to date no TCPs or EO 13007 sites have been identified within the project area." It was also stated that data for TCPs relied on the BLM tribal liaison's knowledge of places and resources. Although local Tribes were sent a notification of project plans and a meeting took place with the Tribal Chairman of the Duckwater Shoshone Tribe, what follow-up has there been in consulting with Tribes on a government-to-government basis and in collecting relevant information?	NAC	<p>On June 7, 2012, letters soliciting information from Native American Tribes and inviting the Tribes to enter into consultation for the proposed project were sent by the BLM to the 11 Tribal governments. The BLM conducted a consultation and information meeting with the Tribes on July 2, 2012 at the Duckwater Reservation. At that time, the BLM tribal liaison and the project manager met face-to-face in a meeting with the Duckwater Shoshone Tribe to discuss sage-grouse and mining activities north of the Duckwater Reservation. On August 10, 2012, the BLM met with the Yomba Shoshone Tribe to discuss the project. The Yomba Shoshone Tribe expressed concerns with impacts to groundwater and applicable mitigation measures.</p> <p>As the Duckwater Shoshone Tribe did not express any specific concerns before the public comment period, additional meetings and consultation have not been conducted in the interim. Tribal comments on the DEIS are addressed in the FEIS. If Native American concerns emerge through consultation, BLM will continue to consult with the appropriate Tribe(s) and individuals to obtain information about those concerns, such that BLM can determine an appropriate course of action taking that information into account.</p>
144.6	NATIONAL PARK SERVICE Pacific West Regional Office	What are the qualifications of the BLM tribal liaison? Does that individual possess a background in cultural resource management and tribal consultation? We recommend that consultation with Tribes be performed in accordance with Tribal Consultation: Best Practices in Historic Preservation by the National Association of Tribal Historic Preservation Officers (http://www.nathpo.org/PDF/Tribal_Consultation.pdf).	NAC	Though this comment is out of the scope of the EIS analysis, it is important to reiterate that resource impacts are analyzed by resource specialists, such as archaeologists and biologists. As a part of the Department of Interior, all analysts must meet Department standards, and implement Department policy. The BLM tribal liaison is a Native American coordinator, with a Bachelor of Science degree in Social Sciences, who has worked in the Ely District Office and with the surrounding tribes for approximately 6 years.

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144.7	NATIONAL PARK SERVICE Pacific West Regional Office	Great Basin National Heritage Area and Lincoln Highway Throughout the document there seems to be an overall lack of recognition that Congress designated the Great Basin National Heritage Area (GBNHA) in 2006 and that this project falls within its boundaries. There is no reference to the designation, or to the implications of the project for the integrity of the GBNHA. The proposed undertaking clearly has the potential to negatively impact heritage resources, including natural and cultural resources in and around the project area, and consequently conflict with the fundamental values of the GBNHA. The GBNHA and the values recognized by its designation should be included and addressed in the Abstract, Executive Summary, and Chapters 3 through 6. The Final Management Plan for the Great Basin Heritage Area was recommended to the Director, National Park Service during February 2013. The September 2011 Draft Plan was prepared in consultation with BLM and other partners, and is available for reference at http://www.nps.gov/grba/parkmgmt/partners.htm . It is recommended that preparation of the Final EIS be undertaken in consultation with the Great Basin Partnership, which also could aid in developing or refining mitigation strategies for all potentially affected resources which may be impacted by this proposal.	CR	The BLM will consult with Great Basin Partnership before the Record of Decision is signed. The project falls within the GBNHA. An impact analysis in regards to visual and cultural resources is presented in the EIS.
144.8	NATIONAL PARK SERVICE Pacific West Regional Office	Lincoln Highway We disagree with the statement in the Executive Summary stating that the project will have minor to moderate and long term impacts to the Lincoln Highway. There would be a permanent adverse effect to a National Register of Historic Places eligible section of the Lincoln Highway through its destruction and relocation. Furthermore, a precedent would be established that would threaten the long-term viability and preservation of other significant sections of the Lincoln Highway in Nevada. The proposed mitigation measures, which consist of a video of its former alignment and an information kiosk, appear to be inadequate when compared with the destruction of the resource. We recommend that the mine not extend to the roadbed of the Lincoln Highway, so that this nationally significant resource will not be destroyed.	CR	The segment of the Lincoln Highway that is within the project area was a segment used only from about 1913-1924 when the highway was realigned. The impacts to the Lincoln Highway segment have been revised to be long-term and major. The purpose of videotaping the condition of this segment is to document its characteristics and condition prior to disturbance as part of mitigation in the form of data recovery. Informational kiosks would provide the public with history about the highway and its realignments. The Lincoln Highway Association is a signatory party of the Programmatic Agreement and was consulted on mitigation.
144.9	NATIONAL PARK SERVICE Pacific West Regional Office	In §3.16 "Socioeconomics", no mention was made of recreation, the NHA, the Lincoln Highway, or tourism as economic drivers (or potential drivers) for the socio-economics of the region. We suggest that you consult with the Heritage Partnership, which may have data on heritage tourism and what scenic and historic corridors, such as the Lincoln Highway, do for an area. Driving is an important and relevant form of recreation that is important to the GBNHA. We also suggest you consult with the Nevada Commission on Tourism.	SOC	A discussion of recreation drivers has been included in the socioeconomic section of the FEIS.

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144.10	NATIONAL PARK SERVICE Pacific West Regional Office	<p>Dark Night Skies and Visual Resource Protection</p> <p>We disagree with the statement in Chapter 4 (and the related statements in the Executive Summary) that says, "Illumination resulting from use of the proposed project lights would have a negligible impact on the night sky, because there are very few existing light sources in the area and the ambient light level is very low." Since the ambient light level is very low, any lights used for the proposed project will be introduced to an otherwise dark background and create high contrast, making light sources readily visible. Referring to the GBNHA, Appendix I (Page 327) of the Management Plan states: "With some of the least polluted skies in the nation, very low humidity, and low population density, the region may offer some of the best night sky viewing in the lower 48 states." Consequently, the ability to view many low intensity astral and stellar features from the area may be reduced or lost. The Visual Resources in Chapters 3 and 4 of the EIS should include a thorough description of the existing night sky condition and the environmental consequences of the proposed action on this nationally recognized area. The minimum amount of light that will be needed at night by the project should be identified. The Mitigation Plan for the project should address impacts to the night sky in detail.</p>	VR	<p>The word "viewing" has been added to the following sentence. "Illumination resulting from use of the proposed project lights would have a negligible impact on viewing night skies because there are very few...". Strong contrasts against the black backdrop was analyzed in Section 4.14.2. A description of existing night sky conditions has been added to Section 3.14.3. Minimum lighting requirements are determined by MSHA.</p>
144.11	NATIONAL PARK SERVICE Pacific West Regional Office	<p>The Visual Simulations provided in Appendix 3C should be included in the main document under Visual Resources. Juxtaposed before and after shots of the APE and surrounding area will visually represent the impacts of the undertaking on the currently open and undeveloped landscape. A simulation of what the project alternatives and access road will look like entering the main highway from the east and the west, as well as the APE and proposed transmission lines from any key overlooks, rest areas, or other places the public might stop and get out of their vehicles to survey the landscape should be included. Providing both day and night simulations would be appropriate.</p>	VR	<p>KOPs were determined based on areas based on high visual quality and high visual sensitivity within the viewshed of the area of analysis. There are no rest areas or overlooks within the viewshed. KOP 2 is located at an area where the public might stop to view landscape. A night simulation was not completed because it would not influence a reasoned choice among alternatives nor would it provide a measurable difference in analysis from what is already provided in Section 4.14.2.</p>
144.12	NATIONAL PARK SERVICE Pacific West Regional Office	<p>In Section 3.14 "Visual Resources", it is noted that for VRM class III lands, moderate changes that are not visible to the casual observer are allowed. These are the types of land determined by BLM to be in the project area. The new road and transmission line and associated facility development, though, would likely be very noticeable to the casual observer who is expecting to see an open, unobstructed, Western landscape of basin and range topography while passing through the historic Lincoln Highway corridor in the GBNHA. The proposed changes do not appear to be moderate when considering the values of the GBNHA. We recommend consultation with the Nevada Commission on Tourism on this issue. The Commission has invested substantial resources in promoting the GBNHA to visitors from around the world.</p>	VR	<p>The project occurs within VRM Classes III and IV, the objectives are identified in Section 3.14.3. Based on direction from the 8400 Visual Resource Management Manual the Visual Contrast Rating System was used to determine the impacts of the project based on the KOPs, in relation to the objectives for each VRM class. The values of the GBNHA would not affect the impacts that were determine using the above method. The BLM Standard Environmental Color Chart was used to</p>

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		The mitigation plan referenced in Appendix 4 suggests that exterior surfaces for new facilities in conjunction with the mine project be of 'shadow gray' and 'shale green'. What do these colors actually look like in different kinds of light at different times of day? Please provide large color samples to the Heritage Partnership, so that they can take the samples out into the field to assess the colors' effectiveness prior to implementation. Work with the Partnership to ensure the most appropriate and suitable colors are employed on new facilities that will be visible from the public roads.		determine the color of ancillary facilities visible from the four KOPs, based on the colors of the characteristic landscape. The Color Chart can be found at the following location: http://www.blm.gov/pgdata/content/wo/en/prog/Recreation/recreation_national/RMS.html The BLM invites all organizations with special expertise to be involved in resource analysis.
144.13	NATIONAL PARK SERVICE Pacific West Regional Office	Thank you for your consideration of these comments and suggestions. For additional information concerning the Great Basin Heritage Area and dark night skies please contact Linda Stonier, Heritage Areas Co-Coordinator, Rivers, Trails, Conservation Assistance, Pacific West Region (415) 623-2322; for information concerning cultural resources and Tribal coordination please contact Mark Rudo, Archeologist, Pacific West Region (415) 263-2361; for information about Lincoln Highway and visual resource impacts, please contact Gretchen Luxenberg, Heritage Areas Co-Coordinator, Pacific West Region (206) 220-4138.	GEN	Statement noted.
145	Tyson	Revenue for the town and more jobs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
146	Jesse Kjorstad	To Whom it may concern: I, Jesse Lee Kjorstad, am in full support of the Midway Gold Pan project. I believe in the right to mine. I also believe Midway will operate in a very responsible and safe manner in all regards to the mining process. Midway has showed great respect for all parties and concerns and I believe they will protect and support the environment and community. Thank You.	POS	Statement noted.
147	Tim Vidrine	Midway Gold would be a good asset to White Pine County. It would give plenty of jobs and tax money to Ely. And they donate a lot of money to the kids here.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
148	Gregory L. LeClaire	I am for the "waste rock disposal site design alternative." It makes no sense to have to run the powerline along the 32 mile route. This project brings with it 150 great paying jobs to an area that needs them.	POS, SUP- WRDA	Statement noted.
149	Mark Breeden, Senior VP Investments Stifel Nicolaus Canada Inc.	Mr. Kreidler, I'm in favor of the project that Midway is proposing. As a past resident of McGill, Nevada when Kennecott was the main employer I realize how vital mining is to White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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150.1	Confederated Tribes of the Goshute Reservation	RE: CTGR Comments on the Pan Mine Project Draft Environmental Impact Statement (Casefile NVN - 090444) The Confederated Tribes of the Goshute Reservation (hereinafter: "CTGR" or "Tribe") respectfully submit these comments on the Pan Mine Project Draft Environmental Impact Statement (Casefile: JV:J - 090444). The CTGR is a federally recognized Indian Tribe and sovereign tribal nation. Our Reservation was formed by executive orders and includes portions of Utah and Nevada, but our resources, interests and use of lands are not confined to the Reservation boundaries. The Tribe's aboriginal homelands include a large area of Nevada and Utah and they encompass the entire Proposed Pan Mine Project Area. Our Tribe still uses our aboriginal territory for hunting, fishing, gathering, sacred/ religious purposes, and other uses. Some tribal uses occur in and around the Pan Project Area. Because of our prehistoric, historic and current uses of these lands, we are concerned about the impacts to the Project Area and surrounding environment on our interests, resources and rights.	GEN	Statement noted. The proposed mine disturbance is located approximately 190 road miles from Ibapah, Utah. BLM is not aware of any unique tribal resources at the project area that are used by the CTGR or that are not available much closer to the Goshute Reservation.
150.2	Confederated Tribes of the Goshute Reservation	After our review of this Pan Mine Project Draft EIS, we are greatly concerned about the potential irreparable environmental impacts - direct, indirect and cumulative impacts - from the proposed mining activity both in the short term and long term. Also, we are concerned that this Draft EIS does not adequately address and mitigate potential impacts. If the concerns are not sufficiently addressed and mitigated to the fullest extent, the BLM as the Federal trustee must reject the proposed Pan Mine Project in order to protect our tribal resources, interests, and rights.	GEN	BLM believes it has disclosed and addressed all potential environmental impacts in the EIS. It is not necessary to fully mitigate all such impacts. BLM's decision on the Plan of Operations will fully consider the environmental impacts along with existing resource values and current stakeholder rights in allowing multiple uses of the project area while preventing undue and unnecessary degradation of the public lands involved.
150.3	Confederated Tribes of the Goshute Reservation	I. Past and Present Mining and Exploration in the Affected Area Mining activity in the Pan Mine region of the Pancake Range has been active at least since 1876. According to the DEIS, at least ten exploration companies have been involved in drilling and exploring the Pan Mine area since 1978. The DEIS also identifies many mine operations and/or exploration endeavors that are past actions in the affected area that have defaced 3,644 acres of land, and many other present mining operations that currently deface 41,097 acres of land. (see DEIS Sections 5.2 and 5.3).	GEN	Statement noted. The comment is referring to the existing disturbances within the cumulative effects area.

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150.4	Confederated Tribes of the Goshute Reservation	<p>II. Synopsis of the Pan Mine Project</p> <p>Midway Gold US Inc. submitted to the BLM Ely District a Plan of Operations (POO) in October 2011 (with subsequent POO revisions in February and May 2012) to commence mining operations on 3,204 acres of BLM-administered land. The proposed Pan Mine Project "is located on the western edge of White Pine County, Nevada in the Pancake Mountain Range approximately 22 miles southeast of Eureka and 50 miles west of Ely". Midway Gold's technical feasibility study has indicated that the proposed Pan Mine mineral reserve of 53,254,000 tons of material contains 864,000 ounces of recoverable gold, thus indicating an economically feasible mine project. However, the DEIS does not address whether the Pan Mine Project would mine other minerals at the site. The Project would construct and operate the gold mine and associated facilities, including but not limited to mining in two main open pits, mining in four satellite pits, developing rock crushing facilities and stockpiles, developing two waste rock disposal areas, developing processing facilities, heap leach pads and ponds, developing groundwater for use in mine operations and associated facilities, developing roads, conducting additional exploration activities, and developing a large number of other mine related facilities.</p>	LUA	The narrative in the EIS describes Midway's plans to mine gold ore and also utilization of waste rock and other common materials on-site for construction of the facilities.
150.5	Confederated Tribes of the Goshute Reservation	<p>Many documents either are not included in the DEIS or on BLM's website for our Tribe to effectively review and comment on this DEIS. These documents include feasibility studies, technical studies on resources, rights-of-way application from Mt. Wheeler Power, and Midway Gold's POO. Based on Midway Gold's POO, the BLM states that their review of the POO ensures: (1) "Adequate provisions are included to prevent unnecessary or undue degradation of Federal lands and to protect the non-mineral resources of the Federal lands;" (2) "measures are included to provide for reclamation of disturbed areas;" and (3) "Compliance with applicable State and Federal laws is achieved." Because the BLM has precluded our Tribe and the public from a fair opportunity to obtain and review the POO (and the other aforementioned documents), our Tribe has no way of appropriately reviewing and commenting on this DEIS and the determinations provided above.</p>	LUA	A complete copy of the Plan of Operations is not typically included in a mining EIS. Copies of the Plan of Operations and other technical reports cited in the EIS are separately available upon request to the Tribe for its review. The Mt. Wheeler Power ROW application is included as Appendix 1A.

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150.6	Confederated Tribes of the Goshute Reservation	<p>III. Inadequate Consideration of Project Conformance with Land Use Plans NEPA documents are required to inform the public as to whether the project will be in conformance with the applicable land use plans. The BLM's planning regulations state that conformance or conformity means that "a resource management action shall be specifically provided for in the plan, or if not specifically mentioned, shall be clearly consistent with the terms, conditions, and decisions of the approved plan or amendment." Conformance also requires the BLM to disclose what elements of land use plans may not be in conformance with the proposed Federal action in the DEIS. According to the BLM 2008 Handbook, if the proposed action does not conform to the existing land use plan, either the proposal should be modified to conform, or a land use plan amendment that allows the action to be considered. Moreover, if the existing land use plan is silent about an activity, the plan direction should be reviewed, including the broad and programmatic goals and objectives. Second, the DEIS fails to disclose whether or not the Proposed Action and Alternatives have possible conflicts with the applicable BLM land use plans. The NEPA question is compliance with land use plans: "Possible conflicts between the proposed action and the objectives of Federal land use plans"</p> <p>"The DEIS must disclose these possible conflicts. If that information is not in the DEIS, then it must be revised so this disclosure can be subject to public notice and comment. With this element absent, the DEIS does not meet NEPA's requirements for full and reasonable disclosure of conformity.</p>	LUA	<p>Section 1.6 of the EIS discusses the relationship of the project to the Ely Proposed Resource Management Plan and other policies, regulations, and plans. This section affirms that the Proposed Action and alternatives are in conformance with the cited plans, statutes, regulations, executive orders, and manuals.</p>
150.7	Confederated Tribes of the Goshute Reservation	<p>The DEIS claims that the Project is in conformance with various land use plans, including "Management Guidelines for Sage-Grouse and Sagebrush Ecosystems in Nevada", "BLM National Greater Sage-Grouse Land Use Planning Strategy", "Greater Sage-Grouse Interim Management Policies and Procedures", and the other documents listed at DEIS 1-7. Our Tribe does not concur with the BLM's findings on conformance with these plans and guidelines in several areas. For example, sage-grouse priority habitat will be destroyed if the Project is approved. This is contrary to several areas within the sage-grouse plans and management guidelines.</p>	SSS	<p>The land use plans cited in the comment do not prevent all impacts to sage-grouse habitat but allow multiple use of federal lands with appropriate mitigation for impacts to sage-grouse habitat. The proposed impacts to sage-grouse habitat are disclosed in the EIS and mitigation for these impacts is also described.</p>

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150.8	Confederated Tribes of the Goshute Reservation	<p>IV. Inadequate Disclosure of Compliance with Statutes, Regulations and Plans: Any NEPA project must achieve conformance with existing regulations, statutes and land use plans. Section 1.6, the DEIS lists an array of plans, policies, guidelines and statutes that have been analyzed to determine whether the Proposed Action achieved compliance. The DEIS provides no basis for the compliance determinations information in the DEIS allows the Tribe to gauge whether the Project is in compliance with that list of plans, policies, guidelines and statutes. This precludes our Tribe, and the general public, from having the opportunity to fairly and adequately evaluate this Pan Mine DEIS to not only ensure compliance but also to ensure proper avoidance of potential adverse impacts on resources that are protected under those plans, regulations, and statutes. The DEIS identifies that there will be impacts on Golden Eagles within the Project area. Golden eagles are protected under the Bald and Golden Eagle Protection Act. Even disturbance of habitat, nests, or individual birds is considered "take" under this Eagle Act. Because the Pan Mine Project would clearly have impacts on these birds, which are sacred to our Tribe, this aspect of the Project is not in conformance with the Eagle Act.</p>	LUA	<p>The BLM staff involved in analyzing the environmental impacts of the project are familiar with the applicable existing regulations, statutes, and land use plans. In the judgment of these experienced individuals, the proposed operations would be in compliance with these regulations, statutes, and plans. Determining this compliance is within the role of the BLM. The Tribe has access to the cited legal documents and can specifically comment if they think there are certain aspects of the Proposed Action and alternatives that they think may not conform to the applicable legal requirements.</p>
150.9	Confederated Tribes of the Goshute Reservation	<p>V. Errors on Project Segmentation: Exploration and mining activities in the Pan Mine Project Area has been ongoing and those actions are similar, connected, and cumulative actions. The relationships of those past actions to this Project have not been adequately explained in the DEIS (see DEIS at 1-1 through 1-5). The past and present mining activities are clearly connected, and thus the environmental impacts in their entirety must be analyzed and disclosed in this DEIS. The BLM incorporates by reference several past EA's for activities in the Pan Mine area; however, that reference and disclosure attempt are inadequate for several reasons. First, the mining activity that has led to the Proposed Action is of longer duration than what has been disclosed in the DEIS. Second, the impacts to the Project area from past actions are not analyzed adequately and in a way that allows the combined impacts of connected/ similar actions to be presented in this single DEIS. While some disclosure and assessment is presented in the Cumulative Impacts chapter regarding these connected actions, the analysis fails on those issues. The DEIS must be revised so that our Tribe has a reasonable opportunity to gauge the totality of the connected action and their cumulative impacts.</p>	CE	<p>The previous exploration projects were conducted under separate NEPA analyses because each one of those projects had its own, separate utility. They are not connected actions to the Proposed Action and their impacts do not require re-analysis in this EIS. The major, prior activity proposed by Midway (NVN-078305) included descriptions of the project area and what impacts would occur from the proposed exploration activity. The existing disturbances in the project area are shown on Figure 2.2-1 in the EIS. The majority of these disturbances are related to drilling and trenching that will either be incorporated into the area of the proposed open pits or buried under the WRDAs, the impacts of which are described in the EIS.</p>

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150.10	Confederated Tribes of the Goshute Reservation	<p>VI. Alternatives to the Proposed Action are Insufficient: NEPA requires that the BLM formulate appropriate alternatives that address not only public concerns and issues raised throughout the NEPA process, but also environmental information available to the BLM. The purpose in developing alternatives to the Proposed Action is to "avoid or minimize adverse effect upon the quality of the human environment." Appropriate alternatives must be developed, studied and described to "recommend courses of action in any proposal which involves unresolved resource conflicts concerning alternative uses of available resource". Moreover, the BLM has the directive to analyze a "reasonable number to cover the full spectrum of alternatives." Alternatives must not simply respond to an Applicant's proposal, but develop alternatives that are practical and feasible while maintaining compliance with state and federal statutes and regulations. The Pan Mine DEIS describes four alternatives - the Proposed Action, Waste Rock Disposal Alternative, the Southwest Power Line Alternative, and a No Action Alternative. Pursuant to prior authorizations, Midway Gold is conducting mining exploration activities that permit 100 acres of surface disturbance, including road construction, drill pads and exploration drilling, trench excavation and borehole augers, sanitation facilities, staging areas for materials and equipment, and development of groundwater wells. While the DEIS appears to examine numerous alternatives, the methods for identifying, selecting and eliminating alternatives is not based on sufficient methodologies. NEPA requires that all Federal agencies "shall identify any methodologies used". The method for deriving alternatives is not disclosed, and the information that is provided remains insufficient. Indeed, the DEIS in Table 2.4-1 provides a matrix of potential alternatives. Yet the DEIS does not disclose where/how each alternative was generated nor is there any justification for its subjective "Yes" or "No" decisions in Table 2.4-1. The presentation of information under Sections 2.4 - 2.6 does not constitute the methodologies used in the decision-making process, and is insufficient justification of the alternatives. (see Section 2.5). Thus, the BLM failed to appropriately construct a reasonable range of alternatives given the issues important to our Tribe and the general public.</p>	ALT	<p>The methodology used to screen the available alternatives listed in Table 2.4-1 is contained in the narrative preceding the table. The table summarizes the decisions made under each of the screening criteria for each of the alternatives considered. The reasons for either including the alternative for full evaluation in the EIS, or not, are included in the narrative for each alternative in Section 2.4 and 2.5. The EIS describes that a total of 13 alternatives were considered for evaluation and for various reasons that are described in the narrative, all but four of these alternatives were determined to be unreasonable and were dropped from full evaluation.</p>

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150.11	Confederated Tribes of the Goshute Reservation	The BLM also failed to develop an appropriate range of alternatives given potential environmental impacts. All of the alternatives that are presented in the DEIS will have irreparable and significant impacts on vegetation, water, air, land use, environmental justice, and tribal religious/ cultural uses of the 3,204 acres of land. Moreover, estimations of impacts from the Project are likely to be greatly underestimated (as presented below), which generates ineffective and underestimated proposed mitigation measures. Because of these issues, there is a clear need for alternatives that would actually reduce impacts.	ALT	See response to Comment 150.10. The action alternatives that were evaluated do reduce impacts to certain resources as described in the EIS. For example, the Southwest Power Line Alternative would have a smaller impact on sage-grouse because it would be further away from known leks. The WRDA Alternative would disturb less area, impact less sage-grouse habitat, and be less visible from KOPs. The closure and reclamation actions proposed for the project would reduce most of the environmental impacts to a large degree following mining. None of the action alternatives would eliminate significant impacts from the proposed mining operations and NEPA does not require this.
150.12	Confederated Tribes of the Goshute Reservation	Given the DEIS' failure to analyze a reasonable range of alternatives, failure to develop sufficient alternatives based on the scoping process and the best available information, and failure to provide due justification for selecting and eliminating alternatives, the DEIS essentially responded to the Applicant's desired outcome. Even a preliminary constraints analysis for the proposed Project would have demonstrated significant impacts of particular resources, including cultural resources and Native American religious values. Indeed, the DEIS identifies that the Proposed Action would result in adverse impacts to several sites that are eligible for the National Register of Historic Properties. These significant impacts alone provide a trigger for the need and development of appropriate alternatives, but the BLM's DEIS states that no effect on historic/cultural properties would occur. Our Tribe had no input on cultural resource inventories, cultural site determinations, NRHP eligibility, and no input on whether cultural sites may be adversely impacted from the Proposed Action. The DEIS apparently has missed previously documented information on cultural use areas/historic sites that did not make it into the impact assessment for this proposed gold mine project.	ALT	See responses to Comments 150.10 and 150.11. A review of Midway's comments on the EIS shows that BLM did not only analyze the proponents desired outcome but evaluated an action alternative (Southwest Power Line) that is more costly and reduces impacts to sage-grouse. The sage-grouse mitigation measures included in the EIS also go beyond what Midway proposed. It is impossible to microsite large disturbances like open pits, WRDAs, and heap leach facilities to avoid individual historic/cultural sites. As described in Section 4.11, such sites would be avoided to the extent practical and those sites that would be disturbed would be treated under the Programmatic Agreement (Appendix 3B) which details what actions would be taken to recover cultural resources data prior to disturbance. This approach has been approved by BLM archeologists and the SHPO.

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150.13	Confederated Tribes of the Goshute Reservation	<p>The DEIS avoids additional working alternatives by suggesting actions that may minimize or avoid some impacts. For example, the DEIS suggests that a treatment plan may be instituted and that data recovery measures may be instituted. These measures would purportedly offset the adverse impacts. We do not agree that those measures would offset impacts to cultural resources. Additional alternatives must be added to the DEIS that respond to and/or avoid entirely the impacts on cultural areas. These Issues are errs of noncompliance. The range of alternatives analyzed fails to match the Federal Land Policy and Management Act as a multi-use mandate. FLPMA is the BLM 's "organic act that establishes the agency's multiple-use mandate to serve present and future generations." Instead, the alternatives simply respond to the Applicant's plan to commence large-scale mining operations in the Pan Mine area. The DEIS fails to consider alternatives that meet the multiple-use mandate that might achieve both the Applicant's proposed Project and the BLM 's mandate to manage lands in a manner that will: protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use. Thus, the DEIS must analyze an appropriate range of alternatives that meets that multiple use mandate and conforms to the entirety of the applicable land use plan(s).</p>	ALT	<p>Section 2.4 of the EIS fully describes the action alternatives included in the analysis. Section 2.5 describes a wide range of alternatives that were considered but determined to not be reasonable for full analysis. The reasons why these alternatives were dropped from analysis are described. The action alternatives selected for full analysis are evaluated for all the resource values included in the analysis.</p>
150.14	Confederated Tribes of the Goshute Reservation	<p>VII. Inadequate Disclosure of the Affected Environment: The DEIS' Affected Environment chapter does not fully disclose important resources. First, the Duckwater Shoshone Tribe's Proposed Expansion Area is not provided in the DEIS. The DEIS must address potential impacts to that are important to the area, to our neighboring Duckwater Tribe's current reservation lands, and to historical prehistoric cultural areas. Not providing that analysis in the Pan Mine DEIS is a failure to meet NEPA requirements on several counts.</p>	NAC	<p>The environmental resources for the project area and potential impacts to those resources are fully disclosed in the EIS. These descriptions would be the same for the Duckwater Tribe's proposed expansion area that may include the same area.</p>

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150.15	Confederated Tribes of the Goshute Reservation	Second, the DEIS does not sufficiently address water resources including groundwater. The DEIS provides an arbitrary "three-mile buffer to allow for impacts that may go beyond the project area" plus the direct effects area of analysis within the actual Project area. . No justification for the three-mile buffer is provided and no information is offered that would suggest that such a buffer distance is appropriate for the environmental conditions in and around the Project area. The Project is situated just north of the Duckwater Tribe Reservation. Groundwater flows from the Project area toward the Duckwater Reservation.	WTR	Section 4.2 of the EIS evaluates potential impacts to groundwater. Impacts to groundwater quality from the proposed processing facilities are considered to be negligible because the processing facilities are designed with proven systems to prevent leakage of process solutions. The geochemistry testing of the material to be placed in the WRDAs has indicated little potential for generation of leachate with deleterious chemistry and the depth to groundwater under these facilities (650 to 800 feet) would also minimize any groundwater quality impacts from these facilities. Modeling of the effects of pumping groundwater for the Proposed Action is also described and the drawdown occurred within the project boundary. These impact descriptions, combined with the distance of the project to the Duckwater Tribe Reservation (27 miles south of the project) indicate there would be no noticeable environmental effects to groundwater at the reservation from the project.
150.16	Confederated Tribes of the Goshute Reservation	Third, endangered species occupy springs at the Duckwater Reservation. Because the springs are connected to groundwater sources,	SSS	See response to Comment 150.15.
150.17	Confederated Tribes of the Goshute Reservation	Our Tribe is concerned that contamination from the Pan Mine will eventually flow to the Reservation and will impact the endangered species and their habitat, Duckwater's domestic wells, irrigation wells, and other water resources in the area.	HAZ	See response to Comment 150.15.

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150.18	Confederated Tribes of the Goshute Reservation	Fourth, the Project area and lands adjacent the Project area had long-term tribal occupancy and uses. No disclosure or descriptions are provided in the DEIS. Presently, the DEIS fails to look at any of these critical environmental issues.	WTR	The affected environment description of cultural resources in the EIS includes descriptive information on page 3-124 about long-term occupancy and use of the general project area by the Western Shoshone and Goshute peoples. Pages 3-127 and 3-131 contain descriptions of the prehistoric resources of the project area. Section 4.11 of the EIS discusses potential impacts to these resources and proposed mitigation measures.
150.19	Confederated Tribes of the Goshute Reservation	VIII. Inadequate Evaluation, Disclosure and Mitigation of Impacts on Water Resources: The DEIS identifies under Section 4.2.1 that the Project may have impacts on water resources both short and long-term, including downgradient springs, surface water, and groundwater. The methods to determine whether impacts will occur, and to what extent, are generally vacant and/ or in need of a sufficient analysis. The DEIS provides no assessment of what distance downstream the impacts may occur to those resources. The DEIS suggests that based on a comparison of topographic map contours, mine activities would not impact an unnamed spring. This assessment is given in the following DEIS statement: there are no mapped springs or seeps within the Proposed Action project area; however, there is an unnamed spring located approximately 0.25 miles due south and upgradient of the area. Based on topographic analysis, the unnamed spring is not downgradient of any mine facilities or disturbance, and therefore would not be impacted by the Proposed Action or any Action Alternatives. DEIS at 4-4.	WTR	See response to Comment 150.15. The information in the EIS indicates there are no seeps or springs in the project area that can be impacted by the operations and the one spring closest to the project area is 0.25 miles upgradient, is ephemeral, and discharges from rock that is non-carbonate (is not supported by the carbonate aquifer that will be pumped by the project). These are the reasons why it was concluded that the project would not impact this spring.
150.20	Confederated Tribes of the Goshute Reservation	The DEIS offers no methodology to make this determination; it does not identify a distance upgradient that the spring is located from the Project Area; it provides no information whatsoever to allow the reader to fairly evaluate the conditions and methods that were used in arriving at that determination. The surface water section 4.2.2 is replete with inadequacies that prevent reasonable evaluations of impacts for the Project.	WTR	See response to Comment 150.19. The environmental impacts discussed in Chapter 4 of the EIS are based on resource descriptions contained in Chapter 3. The description of surface water features in the project area is contained in Section 3.2.3 and concludes that all streams draining the project area are ephemeral, had no continuous, defined channels and no areas of hydrophytic plant communities or hydric soils.

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150.21	Confederated Tribes of the Goshute Reservation	Another example is that the DEIS states that there "are no identified wetlands within or in close proximity to the project area." We have no way of gauging what "identified wetlands" refer to, nor what specific distance "close proximity" refers to. Further, the DEIS does not provide any illustration of where groundwater wells, the unnamed spring, and salient features that may have impacts on the unnamed spring. This precludes our Tribe from having any reasonable opportunity to review this potential impact.	WTR	See response to Comment 150.20. The narrative on page 3-5 of the EIS indicates a field survey was conducted in the project area (see Figure 3.2-1 for location of the project area) and submitted to the U.S. Army Corps of Engineers (USACE). The narrative indicates that USACE guidance was followed (USACE 1987) and no wetlands or areas that meet the definition of waters of the U.S. were identified in the project area. Figure 3.2-7 shows the locations of all groundwater wells and springs that have water rights associated with them.
150.22	Confederated Tribes of the Goshute Reservation	Our Tribe is greatly concerned about the methodology that was used to determine impacts on this water resource, lending to our subsequent concerns of how impact assessments were conducted for other resources throughout this DEIS. The DEIS suggests that "the potential for acid rock drainage and or metals leaching from the WRDAs is considered low" and only minor amounts of arsenic and thallium are likely to leach into the ground. And as a result, there are no assurances that groundwater will not be contaminated either in the short term or long term from the mining activities. Indeed, the DEIS "indicates that impacts to groundwater quality from the operation and reclamation of the WRDAs are considered long-term". The Project must require appropriate avoidance, monitoring and mitigation for any impacts on groundwater.	WTR	Sections 2.3.5 and 2.3.6 of the EIS describe the heap leach processing facilities as being "no discharge" for the reasons described in the narrative. The impact analysis on page 4-6 summarizes the design and operational monitoring of these facilities and concludes there would be negligible impacts to surface water or groundwater. The geochemistry of the waste rock is summarized on page 4-6 citing the Final Baseline Geochemistry Report (Interralogic 2012a) for a full description of the details. More information on the acid generating potential and leachability of the waste rock is contained in Appendix 2A, Waste Rock Management Plan. The EIS narrative and Appendix 2A clearly state that waste rock at Pan will not be acid generating and that leaching of the waste rock by MWMP testing showed all analytes were below the NDEP reference values except for arsenic and thallium. The average concentrations of these two solutes were 0.02 mg/L and 0.03 mg/L, respectively. These low concentrations, combined with the depth to groundwater under the WRDAs (650 to 800 feet) lead to the conclusion that impacts to groundwater quality under the WRDAs would be negligible to minor. Proposed groundwater monitoring is described on page 2-49 and in Appendix 2D.

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				As indicated in the EIS, groundwater monitoring would be conducted in compliance with the requirements of the NDEP Water Pollution Control Permit, which means that data collected would be submitted to the NDEP who would determine if the data indicate any real or potential impacts to groundwater quality and direct any necessary mitigation if impacts are detected. This would occur in the immediate project area, which is located about 27 miles from the Duckwater Tribes' Reservation so there is little chance that groundwater quality at the reservation would be impacted by the project.
150.23	Confederated Tribes of the Goshute Reservation	IX. Inadequate Evaluation, Disclosure and Mitigation of Impacts on Air Resources: Air quality modeling was conducted "to assess ambient air quality impacts off-site as a result of the Proposed Action". The DEIS must provide maps of air quality dispersion models to show the pollutant dispersions across different temporal scales to determine the extent of impacts to downwind areas, including the Duckwater Reservation, their Proposed Expansion Area, and any of our tribal historical/ cultural use areas. Given the multitude of air pollutants, our Tribe is concerned not only about the air quality in general, but particularly about the air quality impacts on the Duckwater Tribe.	AQ	The EPA limits concentrations of criteria pollutants where there is public access and the Nevada Bureau of Air Pollution Control enforces the limits as concentrations not to be exceeded. Air dispersion modeling was conducted to estimate what the air pollutant concentrations will register at points accessible to the public under the influence of local meteorological conditions. The technical support document on the modeling analysis shows that the wind blows predominately from the south at the project area. The Duckwater Reservation is located approximately 27 miles south (typically upwind) of the proposed site. The air dispersion modeling predicted impacts up to three miles from the site with maximum concentrations located at the property boundary and decreasing concentrations radiating out from the boundary to the three mile distance. The maximum concentrations were found to be well below the EPA limits within the extent of the model. Local wind patterns suggest that any emissions from the site would be blown away from the Duckwater Reservation.

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150.24	Confederated Tribes of the Goshute Reservation	<p>The proposed Project will put a large number of pollutants into the air. Quantities of pollutants are given in tons/ year. Based on modeling predictions, the pollutants are generally shown as process and ancillary emissions, fugitive dust emissions, vehicle tailpipe emissions, greenhouse gas emissions, mercury emissions, hazardous air pollutant emissions. NEPA requires that all of these different types of predicted emissions be disclosed as regulatory caps, grand sums, estimates of how mitigation subtracts from the grand sums, amounts already present in the affected environment, the causes of different emissions, and incremental increases from different sources. At present, the DEIS does not provide an understanding of these separate elements and how they add an increment to the cumulative. The DEIS only provides regulatory caps on nitrogen oxide, sulfur dioxide, carbon monoxide, PV110, PV12.5, led, ozone. No regulatory cap is provided for HAP emissions for example.</p>	AQ	<p>The air dispersion modeling was conducted using all emission sources within the proposed site. The modeling used hourly emission rates and local meteorological data to predict the concentrations at receptors located at the property boundary and spaced out in a Cartesian grid extending three miles from the property boundary. The maximum impacts were located on the property boundary and decreased outward radially. NDEP requires estimation of the total emissions from various activities in order to impose fees based on the level of pollution emitted from the facility. The EPA does not have a method in place for modeling HAP emissions. NDEP utilizes a best available control technology analysis on sources of HAPs in order to minimize the quantity released to the atmosphere. Like criteria pollutants, HAPs are quantified and NDEP imposes a fee based on the levels emitted.</p>
150.25	Confederated Tribes of the Goshute Reservation	<p>Disclosure of GHG emissions is inadequate. On February 18, 2010, the Council on Environmental Quality provided a draft guidance memorandum to assist Federal agencies to improve their consideration of effects of greenhouse gas emission (GHGs) and climate change in their evaluation of proposal for Federal actions under NEPA. CEQ brought attention to the issue of how GHGs and climate change issues are considered in NEPA documents to provide a chance to examine reasonable alternatives and mitigation of impacts. The CEQ guidance brings forth two main issues: (1) The GHG emissions effects of a proposed action and alternative actions; and (2) The relationship of climate change effects to a proposed action or alternatives, including the relationship to proposal design, environmental impacts, mitigation and adaptation measures. The CEQ guidance identifies that the Federal government is committed to the goals of energy conservation, reducing energy use, and eliminating or reducing GHG emissions, among other renewable energy goals. The BLM is obligated to consider and conduct the appropriate environmental analyses in federal projects that implicate these goals. The CEQ identifies that "information on GHG emissions (qualitative or quantitative) that is useful and relevant to the decision should be used when deciding among alternatives." Thus, it is appropriate for the BLM to quantify and disclose estimates of GHGs given off from all Project activities - direct, indirect and cumulative emissions - no matter whether they are primary or secondary</p>	GHG	<p>The method used to calculate the GHG emissions from the Proposed Action and alternatives utilized CFR Part 98 – Mandatory Greenhouse Gas Reporting. This method reduces the various GHG constituents into one CO2e (carbon dioxide equivalent) value. CO2, CH4, and N2O were all calculated for project combustion sources such as propane, diesel, and gasoline. While disturbance of the existing vegetation and soil at the site would affect the carbon sequestration in these media, the combined effect would be relatively small, compared to the GHG effect from fuel combustion related to the project. The carbon sequestration in the desert soil and vegetation present at the site can be estimated but is relatively small compared to regions with mature forest cover. The project specific, carbon mass balance is dominated by on-site burning of large quantities of fuel in mobile</p>

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		<p>importance in terms of quantities of emissions. GHG emissions associated with the proposed Project primarily would be associated with the consumption of energy for mining and ore processing over the life of the mine. The DEIS does not disclose GHG emissions other than "process and fugitive" CO₂ emissions, which is based on an arbitrary decision to disclose only those "primary" GHGs. CEQ and NEPA guidance does not limit the disclosure of GHG emissions to primary pollutants as suggested in the DEIS at 4-28. The BLM must quantify and disclose all sources of GHG emissions and expected amounts for this mining project DEIS, especially since mining activities emit GHGs both from machinery use and land disturbance. Defacing and disturbing the ground surface invariably causes a release of GHGs and changes the natural GHG flux. The Project proposes to disturb about 3,204 acres of land, including large amounts of soil and vegetation. The loss of vegetation eliminates the natural GHG fluxes, and likewise soil disturbance by mining and bulldozing releases GHGs such as CO₂, CH₄ and N₂O. Both vegetation and soil GHG losses to the atmosphere, and the land's long-term inability to function properly in terms of GHG fluxes following disturbance, must be considered. The DEIS must include all types GHG emissions from all of the sources and provide estimates of those emissions no matter the type or quantity. Otherwise, the DEIS does not meet full disclosure for public review and commenting.</p>		<p>equipment and these emissions have been disclosed (Table 4.6-5). These GHG emissions, or the effects of soil and vegetation disturbance on carbon sequestration, would not differ between the mining action alternatives under consideration to any significant degree. Additional information on climate change has been added to the Climate Change section of Section 5.8.6 of the EIS that summarizes the current understanding of the effects of climate change on the environmental resources of the general project area. The GHG emissions of the project are already described in Section 5.8.6 and these are compared to estimates of existing GHG emissions at the state, national, and global scales. This shows that the GHG emissions from the project would be negligible compared to global amounts so the direct effect of the project emissions on the overall effects of climate change would be negligible.</p>
150.26	Confederated Tribes of the Goshute Reservation	<p>X. Inadequate Evaluation, Disclosure and Mitigation of Impacts on Vegetation and Wildlife Resources: The evaluation and disclosure of impacts on vegetation and wildlife resources are insufficient. The DEIS in the previous Air Resources section essentially omits any analysis and disclosure of climate change, which can add an increment of impact on resources: Climate change analyses are comprised of several factors, including GHGs, land use management practices, and the albedo effect. The tools necessary to quantify incremental climatic impacts of specific activities associated with those factors are presently unavailable. As a consequence, impact assessment of effects of specific anthropogenic activities cannot be performed. Additionally, specific levels of significance have not yet been established. Therefore, climate change analysis for the purpose of this document is limited to accounting and disclosing of factors that contribute to climate change. Qualitative and or quantitative evaluation[s] of potential contributing factors within the planning area are included where appropriate and practicable. DEIS at 4.28. The potential impact on native and invasive vegetation, for example, is only partially addressed in this DEIS because of the failure to address how climate change coupled with mining activities will impact the resource. The Humboldt-Toiyabe National Forest Vulnerability Report 2011 [USFS 2011] addresses potential effects of climate change to natural resources in the Project area. Regarding invasive species, the USFS study states the</p>	GHG	<p>See response to Comment 150.25. As stated in the comment, "The tools necessary to quantify incremental climatic impacts of specific activities associated with those factors are presently unavailable. As a consequence, impact assessment of effects of specific anthropogenic activities cannot be performed. Additionally, specific levels of significance have not yet been established. Therefore, climate change analysis for the purpose of this document is limited to accounting and disclosing of factors that contribute to climate change." Since there are no quantifiable levels to compare climate change to at this time, the level of analysis was performed to the furthest extent possible without the additional levels to compare. Additional discussion of the effects of climate change on the local environmental resources of the project area has been added to the</p>

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		<p>following: Invasibility of cheatgrass (<i>Bromus tectorum</i>) varies across elevation gradients on the Forest and appears to be closely related to temperature at higher elevations and to soil water availability at lower elevations. Cold soil temperatures at higher elevations limit the growth and reproduction of cheatgrass. High variability in soil water and lower average perennial herbaceous cover appear to increase invasion potential at low to mid elevations explaining the high susceptibility of more mesic Salt desert shrub and Wyoming sagebrush ecosystems to invasion by cheatgrass. Fire and removal of perennial herbaceous species increases the susceptibility to invasion due to elevated soil water and the lack of competition. These environmental conditions identified above are conditions influenced by climate change and land disturbances such as this Pan Mine Project. Climate change is predicted to generally cause warmer temperatures, earlier snowmelt, impacts to springs and other water resources, and climate-induced vegetation and wildlife whereby the drought-tolerant and heat-tolerant species will be favored. This DEIS fails to make any attempt to evaluate and disclose anticipated effects of climate change separately and/or combined with Project-level impacts. This fails the test of a hard look that is required in NEPA documents. There must be additive and synergistic effects over the long term from the Project and climate change added to the DEIS.</p>		cumulative effects section for air resources.
150.27	Confederated Tribes of the Goshute Reservation	<p>The Proposed Action will denude 2, 752 acres of vegetation, including pinyon-juniper stands that our tribal ancestors and tribal members have used as a center for pine nut harvests since time immemorial. Thirty-five percent of the 3,204-acre Project area is pinyon-juniper, mixed with other shrublands. There are a large number of other plants that have traditional uses in the Project area. No discussion is provided that indicates this or suggests in any way that tribal uses of plants may be impacted. The loss of vegetation would constitute a significant loss. Moreover, there will be long term direct, indirect, and cumulative impacts. The DEIS fails to provide disclosures that allow the reader to see what the additive and synergistic impacts would be from the Proposed Action. Mitigation that is offered to offset impacts on vegetation includes mostly reclamation. While there may be an aim to successfully reclaim disturbed areas, it is well known that sagebrush and pinyon-juniper habitats cannot be successfully reclaimed in the short term. These vegetation types require many decades of succession before they start to revert to pre-disturbed conditions.</p>	VEG	<p>Language has been changed in the FEIS from "short-term impacts" to "long-term impacts." Although reclamation may take a long period of time depending on plant succession and reclamation success, reestablishment of pre-existing vegetation communities will occur. The vegetative communities of the project area are not unique and there are ample areas of similar vegetation closer to the Goshute Reservation that can be used for traditional uses.</p>
150.28	Confederated Tribes of the Goshute Reservation	<p>Our Tribe also is concerned about the potential impacts on wildlife. Sage-grouse leks occur very near the Project Area, with distances ranging from 1.04 to 2.98 miles from the Project site. DEIS at 4-43. And admittedly, the DEIS identifies that these leks are likely to be impacted from the mining operations and construction. DEIS at 4-43. This runs contrary to statements early on in the DEIS that indicated the Proposed Action and Alternatives are in conformance with applicable management guidelines, plans and regulations. Moreover, Figure 4.8.1 clearly</p>	SSS	<p>The process for determining impacts and conservation measures for sage-grouse has been directed by a collaboration between the proponent, NDOW, and the BLM. Further, research studies are ongoing and will help to avoid listing of the species. Mitigation measures for sage-grouse have been</p>

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		shows that sage-grouse priority habitat would be destroyed by Project construction. Instead of providing much analysis of this real impact, the DEIS stresses the potential impacts on sage-grouse from natural predation from ravens, hawks and eagles. In fact, the DEIS uses about twice as much text space to describe that ravens, hawks, and eagles may hunt sage-grouse compared to the DEIS text that discloses the impacts from the mine project on sage-grouse. DEIS at 4-48, 4-49. The fact that sage-grouse have natural predators is not the issue at hand for this DEIS. The issue is: What is the impact from the Proposed Action and Alternatives?		developed through collaboration with the proponent, NDOW, and the BLM to comply with management plans and guidelines for the species. Mitigation measures such as modified transmission lines have been developed to avoid increased predation by natural avian predators. Off-site mitigation has been developed to avoid direct impacts to sage-grouse as habitat improvement projects will be conducted within the same Population Management Unit.
150.29	Confederated Tribes of the Goshute Reservation	The DEIS must describe fully what the impacts will be and develop the appropriate mitigation for those impacts. In fact, much of the mitigation offered to avoid impacts on sage-grouse skirts the issue of the actual impacts on sage-grouse and their habitat in the Project area. Instead, the mitigation offers "off-site mitigation" and minor alterations such as modified transmission lines, vehicles speed limits, restricting engine brakes. DEIS at 4-54. Thus, the DEIS not only fails to be in conformance with applicable sage-grouse management plans and guidelines, but the DEIS also fails to disclose, evaluate, and mitigate real impacts on sage-grouse and their habitat.	M&M	See response to Comment 150.28.
150.30	Confederated Tribes of the Goshute Reservation	The Project Area also contains Golden Eagle habitat and nesting territory. DEIS at 4.45. Eagles are sacred animals to our Tribe and the Project must not impact these animals and their nesting territory, which is protected under the Bald and Golden Eagle Protection Act. Indeed, even "nest site abandonment constitutes take under the Eagle Act". "Take" includes pursuit, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb (CSC 668c; 50 CFR 22 .3). Nest site abandonment or any disturbance to the nest is defined as disturbance, which is "take" under the Eagle Act. Further, there may be cumulative impacts that lead to a "take" under the Eagle Act. This DEIS is silent on these issues and fails to conduct any real assessment of whether mine construction and operation will impact eagles, their nests, and habitat. Further, the DEIS does not address the cumulative impacts for this resource parameter, but must do so to provide full disclosure of impacts on wildlife resources.	SSS	Pages 4-45 and 46 of the EIS described that impacts to golden eagles would potentially occur if nesting was attempted or occurred during mine construction activities and that construction would potentially displace eagles from nests and the surrounding foraging habitat. The narrative also quotes USFWS descriptions of the relationship between disturbance of eagles and potential "takes". The narrative on page 4-46 describes other potential project impacts to eagles including collisions and electrocution from power lines, habitat fragmentation, and displacement. Section 5.10.3 describes the potential cumulative effects to golden eagles from mineral development, oil/gas and geothermal development, utility lines, recreation, roads, and grazing.

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150.31	Confederated Tribes of the Goshute Reservation	<p>If there is a likelihood of these impacts, which is already obvious, the DEIS must provide appropriate mitigation to first and foremost avoid impacts, and secondarily to minimize and offset impacts. The mitigation provided in the DEIS to offset impacts to golden eagles in the Project area is as follows: In Utah, Rom in and Muck (1999) recommend habituating raptors to noise and other disturbance activities associated with a project. Specifically, these authors state that "beginning land use, human activities, or construction prior to the breeding season will allow a pair of raptors to "choose" whether the nest site is still acceptable considering the disturbance. Warning sirens at regular intervals have also been used to alert raptor pairs to potentially startling noises such as blasting. This technique has generally been used where there is no acceptable alternative to the proposed action. While loss of the nest site may occur the goal of this technique is to avoid the loss of eggs or young and allow the adults an opportunity to select an alternate nesting site." These habituation techniques would be applicable to the Proposed Action. If activities such as blasting were to begin during early spring and summer, birds potentially nesting in proximity to the project area would either become habituated to the disturbance or seek another location for nesting. Pre-disturbance signals such as sounding sirens prior to blasting may be effective in limiting negative raptor responses to blasting. As sounding sirens prior to a blast is a standard safety practice at most mine sites, this technique would be implemented to reduce impacts. Our Tribe has serious concerns about this idea as an effective piece of mitigation. The mines already sound their sirens to alert workers of blasting. Mitigation is suppose to be effective, so the question is whether this sounding-of-sirens mitigation technique actually works and actually offers any real mitigation to the loss, damage, or take of golden eagles and their habitat. The BLM must devise real mitigation for golden eagle disturbance/ take in the Project area. The DEIS then must be revised and resubmitted for public review and comment.</p>	M&M	<p>The direct, indirect, and cumulative effects on golden eagles is described in the EIS (see response to Comment 150.30). Reference to Romin and Muck (1999) habituation techniques in reference to mitigation measures have been removed and added to Environmental Protection Measures in Chapter 2. Section 4.8.2.1 includes mitigation measures for golden eagles and refers to the BBCS for more details. The BBCS will be included as an appendix in the Final EIS.</p>
150.32	Confederated Tribes of the Goshute Reservation	<p>There is no disclosure or evaluation of impacts on elk. Elk are important for our tribal member's use all over White Pine County including areas near the Project area. We are surprised to see that no assessment was conducted on elk and their habitat for this Project. No disclosure of important elk habitat is provided.</p>	WLF	<p>Section 3.2 of the EIS discusses hydrologic resources and identifies that they are extremely limited within the project area. Rocky Mountain elk are extremely mobile but require watering sources, especially during warm months. Although the project falls within the western portion of NDOW Hunt Unit 131, which is managed for elk, the 2012 NDOW Big Game Status Book does not identify the northern portion of the Pancake Range, which is the location of the project area, as occupied elk habitat.</p>

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150.33	Confederated Tribes of the Goshute Reservation	We are concerned that the elk that may occupy or use the Project area for any duration may be subject to pollution from contaminated water, air, soil, and vegetation.	WLF	The EIS discusses the Environmental Protection Measures included in the design of the facilities to eliminate releases of process solutions or contact with those solutions by wildlife. Environmental analysis included in the EIS indicates that toxic pollution to surface water and groundwater is considered to be negligible so potential uptake by wildlife and vegetation of toxic pollution is also unlikely. Air emissions have been shown in the EIS to be in compliance with applicable state and federal requirements for protection of human health. The EIS indicates that soil that is salvaged would be stockpiled in designated locations to preserve it for future use in reclamation. Finally, the immediate project area where all the most significant, physical impacts would occur is not likely going to be used by elk while the 24/7 operations are ongoing (see response to Comment 150.32).
150.34	Confederated Tribes of the Goshute Reservation	The DEIS must address the direct, indirect or cumulative impact on elk. And because tribal members hunt elk in this region, this is a tribal cultural use that the DEIS must disclose how that use will be impacted by the Project.	CE	See response to Comment 150.32.
150.35	Confederated Tribes of the Goshute Reservation	Our Tribe also is concerned about the impacts and mitigation on big game species that tribal members rely on for hunting.	M&M	Statement noted.

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150.36	Confederated Tribes of the Goshute Reservation	The BLM identified that pronghorn antelope and mule deer are the two primary big game species that occur within the Project area, DEIS at 3-95. These animals range from the Project area to areas where tribal members hunt for and rely on these animals. The DEIS does not disclose the critical habitat for these animals and does not evaluate the impacts on the habitat or the animal populations. And because of the pollutants that are inherent in gold mining operations and processing, we are concerned that these animals may get contaminated from the mine pollutants in the air, water, soil or vegetation. The DEIS mentions that impacts to mule deer and pronghorn antelope would be "short-term and negligible." But it is not clear as to how this determination arose, especially given that some impacts have not been disclosed and evaluated.	WLF	Environmental Protection Measures and mitigation measures have been developed to avoid impacts to wildlife species and are described in the EIS. Critical habitat for these two species was not identified during consultation with NDOW. Through consultation with NDOW, it was identified that mule deer are found in low densities within the northern portion of the Pancake Range and pronghorn antelope tend to favor the agricultural fields to the west of the project, especially during summer months. The mule deer and pronghorn antelope short-term and negligible impact determination was determined due to noise and human activity within the project area likely displacing these species to adjacent habitat during activities associated with the Proposed Action.
150.37	Confederated Tribes of the Goshute Reservation	XI. Inadequate Evaluation, Disclosure and Mitigation of Impacts on Cultural Resources, Native American Concerns, and Indian Sacred Sites: The Pan Mine DEIS analysis of impacts on Native American Concerns and Traditional Values is severely deficient. For starters, the BLM greatly diminishes the importance of the region to the Tribes. Our Western Shoshone ancestors have occupied the region since time immemorial. The Project Area is right in the heart of some Western Shoshone homes, villages, and hunting and gathering locations. The DEIS offered the following as their assessment method in determining Native American concerns: The analysis of potential impacts to Native American Concerns and Traditional values is based on a review of known tribal interests, traditional cultural places, trust assets/ treaty rights resources, and consultation with the potentially affected Tribes.	NAC	Section 3.12.3 of the EIS identifies the Duckwater Shoshone and Te-Moak Tribe of Western Shoshone as Indian Tribes that may attach religious and cultural significance to cultural resources within the APE; further it states that there are traditional use areas in the vicinity of the project area used for hunting and gathering. The purpose of an EIS is not to provide an exhaustive review of information and background for all resources associated with the project area. Instead it presents only the data required to analyze potential impacts.
150.38	Confederated Tribes of the Goshute Reservation	We are not sure what the BLM means by "known" interests, places, and resources. Background literature reviews easily would have shown that there are tribal interests, cultural places, and resources important to the Tribes. This approach to summarily reject any importance that the area has historically and culturally to Tribes based on what is "known" is of great concern. The definition of "known" seems to be quite limited in scope. We are left to assume that all of the known information was contained in cultural resource inventories, which our Tribe was precluded from having any involvement in whatsoever. As such, we were not given an opportunity to add tribal perspectives, tribal history, interpretations, and our literature reviews and findings into those cultural resource documents. We were not given an opportunity to examine and interpret on the ground resources.	NAC	BLM acknowledges that the area holds importance to the Tribes. The BLM regrets that the Tribe was not asked to participate in the cultural resource inventories, the NRHP-eligibility determinations, and review of cultural resources documentation for the project. The BLM will provide copies of the cultural resource inventories for review and comment by the Tribe.

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		Moreover, any preliminary assessment of the importance of the region to Tribes should have required the BLM to conduct an ethnographic assessment, which may have illuminated our cultural ties and concerns to the area.		
150.39	Confederated Tribes of the Goshute Reservation	Without the appropriate studies or any reasonable effort to address tribal religious values and concerns about the Project, the BLM failed to make a good faith effort to attach religious and cultural experiences to the cultural sites in the area of potential effects. No associated impact analysis was provided for the Tribe and the public to consider. ACHP regulations require the BLM, in consultation with SHPO and any tribe that attaches religious and cultural significance to site, to apply criteria of adverse effect with respect to all the characteristics of a culturally significant site that qualify it for listing or eligibility under the National Register. Tribal consultation and ethnographic assessments are often necessary in order to thoroughly document sites and gauge adverse impacts. Our Tribe was precluded from having a reasonable opportunity to participate in the identification of sites and in the resolution of any adverse effects. Moreover, this violates the BLM's regulatory and statutory requirements of full and fair disclosure and duty to inform the public that it has indeed taken a hard look at these potential impacts. BLM is obligated to carefully and fully contemplate the environmental effects of the proposed agency action, and to insure that the public has sufficient information to review and comment on the agency's determinations.	NAC	Ethnographic data for the area exists and was used in the DEIS. In 2003, Ginny Bengston did an ethnography/ethnographic overview of the Northern Paiute and Western Shoshone (including Confederated Tribes of Goshutes) for Nevada BLM (BLM Cultural Resource Series No. 12 - 2003). This document combined many studies and ethnographic information that is pertinent to the area. Consultation and coordination with the Tribes supplements this data. A project-specific ethnographic study was not deemed necessary.
150.40	Confederated Tribes of the Goshute Reservation	The DEIS states that "[t]here are no known potential places of cultural and/ or geographic interest to the Tribes within or near the project area." DEIS at 4-6 7. Further the DEIS states that ". No TCPs or EO 13007 (Executive Order on the Indian Sacred Sites) sites have been identified within the project area that might be impacted by the Proposed Action. Therefore, no impacts to "Native American religious concerns are anticipated from the Proposed Action." Our Tribe does not agree with this assessment as the area provided historical homes and village sites for our tribal ancestors, pine nut gathering areas, and hunting areas for the Tribes. These above issues establish an incorrect and misleading assessment of impacts on tribal interests and resources, evading the requirement to consider every significant aspect of an environmental impact of the Proposed Action. Further, "NEPA documents require that environmental concerns have been fully considered in the decision making process and that those issues are clearly articulated for public review and comment. Without this disclosure, the document gives the appearance that there will be no impacts on resources and interests that are important to Tribes. Based on this alone, the DEIS must be revised and resubmitted for public comment and review.	NAC	As Native American concerns emerge through consultation, BLM will continue to consult with the appropriate Tribe(s) and individuals to obtain information about those concerns, such that BLM can determine an appropriate course of action taking that information into account. Additional information has been added to the EIS.

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150.41	Confederated Tribes of the Goshute Reservation	Our Tribe was precluded from having a fair and reasonable opportunity to participate many of the cultural resource inventories, the NRHP-eligibility determinations, and the review and final decisions presented in cultural resource documents. The BLM identified in the DEIS at 3-130 that numerous cultural resource inventories have been conducted in the Project Area: Class III cultural resource inventories (systematic and detailed field inspections) were conducted for the entire fenced area and access roads (Banks, et al., 2012a, 2012b, 20 12c, and 2012d; Orcutt and Brewer, 2012). ... Information regarding cultural resources in the project area was collected through literature searches and field inventory.... Data for cultural resources includes record search information for an area one-mile out from project components and field inventories.	CR	The BLM regrets that the Tribe was not asked to participate in the cultural resource inventories, the NRHP-eligibility determinations, and review of cultural resources documentation for the project. The BLM will provide copies of the cultural resource inventories for review and comment by the Tribe.
150.42	Confederated Tribes of the Goshute Reservation	Yet, our Tribe was never provided an opportunity to participate at any stage of the cultural resources projects that are well within our aboriginal territory and in close proximity to Tribal lands. Our Tribe's review and input was never asked for, we were unaware of when these inventories were being conducted, and we were never given copies of the cultural resource inventories. Our Tribe had no part in the field surveys or conclusions drawn in the reports. Our Tribe's interpretations of tribal cultural resources generally are different than what is provided by BLM studies and inventories by an applicant's third party consultant.	CR	See response to Comment 150.41.
150.43	Confederated Tribes of the Goshute Reservation	The BLM determined, without Tribal participation in any part of the cultural resources work, that "impacts to cultural resources would be minor to moderate and long-term". DEIS at 4-66. The DEIS summarizes the cultural resource findings as follows: There are 75 NRHP-eligible cultural resource sites (i.e., historic properties) known to be within the project area (Table 3.11-1. These include 67 historic sites, one prehistoric site, and seven multi component sites. Impacts could potentially be avoided through construction design modification or mitigated through data recovery studies. DEIS at 4-66. unfortunately, our Tribe has no way to fairly evaluate the cultural resources, as we were not part of the inventories nor the interpretations of field data regarding what constitutes a cultural site and what constitutes NRHP eligible resources based on the NHPA criteria. This DEIS suggests that impacts to our cultural resources can be "mitigated through data recovery studies." This is not sufficient mitigation for the wholesale permanent loss of cultural resources. Appropriate And sufficient mitigation must be a part of the DEIS in order for the project to be approved.	CR	Mitigation or treatment for impacts to cultural resources is outlined in Section IV of the Programmatic Agreement which has been signed by the Nevada SHPO, the Duckwater Shoshone Tribe, and the Lincoln Highway Association. The Programmatic Agreement will be included as Appendix 3B in the EIS. As Native American concerns emerge through consultation, BLM will continue to consult with the appropriate Tribe(s) and individuals to obtain information about those concerns, the importance of the resource, and what mitigation measures might be appropriate, such that BLM can determine an appropriate course of action taking that information into account. The Project would implement actions to ensure that cultural resources that are to be avoided by Project design or redesign are not impacted during construction, operation, or reclamation activities. Such actions would be subject to agency approval and may include,

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				as appropriate, temporarily placing barriers or marking areas to be avoided; monitoring by a professional archaeologist; and/or placing locked gates to restrict public access to roads that may increase the potential for indirect impacts. For historic properties (NRHP-eligible cultural resources) that cannot be avoided, scientific data recovery may be implemented to mitigate impacts. Procedures for scientific investigations, reporting, and long-term preservation of data and collections would be specified in a Historic Properties Treatment Plan implemented in accordance with the terms of the Programmatic Agreement. Additional consultation with the Tribes will occur during this process.
150.44	Confederated Tribes of the Goshute Reservation	<p>XII. Inadequate Evaluation, Disclosure and Mitigation of Impacts on Environmental Justice and Health Concerns: The DEIS fails to provide an appropriate analysis of environmental justice. The EPA defines environmental justice as "the fair treatment and meaningful involvement of all people regardless of race, color, sex, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies." The DEIS offers that an adverse impact on environmental justice is one that would result in several cases: (1) disproportionate high and adverse human health or environmental effects on minority populations or low-income populations; (2) increased risk of rate of exposure to an adverse environmental hazard by a minority population or low-income population that appreciably exceeds the risk or rate of exposure to the general population; and (3) health and safety hazards that disproportionately affect children. Moreover, the BLM made a determination of adverse impact on environmental justice based on these two factors: (1) whether the impact would be likely on the natural or physical environment that significantly and adversely affects a minority population or low-income population; and (2) whether environmental effects would have a significant adverse impact on minority or low income populations or children. DEIS at 4-102. The DEIS states that "impacts on environmental justice issues would not be anticipated." This is incorrect. We cannot find where there is any real analysis or details on this matter in the DEIS. However the BLM arrived at this determination seems questionable and is replete with serious flaws because of other problems in the way this impact assessment has been conducted across resource parameters. For example, the DEIS did not provide a sufficient analysis</p>	EJ	<p>As noted in Section 3.17.2, the Environmental Justice analysis was conducted using EPA's Environmental Justice Geographic Assessment Tool in combination with demographics data provided by the US Census Bureau. The Duckwater reservation is not in the EJ analysis area nor in the CESA. As noted in Section 4.2.2 of the EIS, no groundwater quality impacts are expected to occur within the Project Area. Therefore, it is unnecessary to conduct fate and transport modeling to evaluate impacts to groundwater quality at the Duckwater Reservation. However, Midway would implement a groundwater monitoring plan to detect any changes in groundwater level and quality that may be associated with mining activities (Interralogic, 2012b). The monitoring plan would include a network of monitoring wells in both the deep carbonate aquifer and the perched alluvial aquifer below and downgradient of the project area and well upgradient of the Duckwater Reservation.</p>

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		of groundwater quality or air quality impacts and how those impacts will be carried toward the Duckwater Reservation. Groundwater flows south from the Project area to the Duckwater Reservation. No analysis was conducted to determine the rate of groundwater flow and how long it might take for contaminated groundwater to meet the Reservation. Whether that time period is 10 years or 100 years, that potential impact is likely to occur and is certainly an environmental justice impact.		
150.45	Confederated Tribes of the Goshute Reservation	The DEIS also failed to appropriately address impacts on air quality that may impact the Duckwater Reservation. There was no assessment of which direction and how far air quality will be impacted. If such an analysis demonstrated that air pollutants impacted the Duckwater Reservation, this could constitute an adverse impact of environmental justice. But because the DEIS has not provided full disclosure of these types of potential impacts on resources, the environmental justice impact cannot be fairly gauged. The fact that the DEIS indicates that there will be 3204 acres of impact on our ancestral homelands, impacts to our history, impacts to historic tribal homes and villages, impacts to ancestral hunting and gathering areas, impacts to our sacred animals, plants and other resources collectively and separately constitutes adverse impacts on environmental justice according to BLM's own criteria. BLM's determination must be reversed. Further, this DEIS must be revised to include the appropriate impact analyses, the appropriate impacts on environmental justice, and the appropriate determinations of impacts.	AQ	The air dispersion modeling analysis and the technical supporting document shows that impacts to air quality at points accessible to the public are below the health-based limits set forth by the EPA and enforced by the Nevada Bureau of Air Pollution Control. The modeling analysis predicted the impacts extending three miles outward from the project boundary using local meteorological data. The maximum impacts were below all applicable health-based limits as seen at the project boundary, decreasing away from the site. Also included in the analysis was a wind rose. Winds can be seen at higher velocities from the south heading north. Since the project is located approximately 27 miles north of the Duckwater Reservation and winds travel in a northward direction at the project site, the impacts at the Duckwater Reservation would be negligible. Because the impact analysis has not demonstrated a adverse impact to the public, there would not be an environmental justice impact to the Duckwater Reservation.
150.46	Confederated Tribes of the Goshute Reservation	XIII. Inadequate Evaluation, Disclosure and Mitigation of Cumulative Impacts: A cumulative impact as defined under CEQ regulations Section 1508.7 is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably future actions regardless of what agency (Federal or nonfederal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." Our Tribe has concerns about the inadequate evaluation and disclosure of cumulative impacts for this Pan Mine Project. The Pan Mine DEIS provides a rather large list of past projects within a rather large spatial extent. The DEIS provides miles of impact in some cases, areas of impact in other cases and then sums the total acreages and miles of	CE	The past, present, and reasonably foreseeable actions are summed in Table 5.1-3 of the EIS. The individual actions, disturbances and projects are described in some detail in Sections 5.2, 5.3 and 5.4. The major impacts on environmental resources from the Proposed Action are directly related to surface disturbance so surface disturbance characteristics from the past, present and reasonably foreseeable actions are presented in Table 5.1-3. The incremental increase in

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		<p>disturbance. While these general developed areas are interesting, the DEIS fails to show the incremental increase of impacts for a given resource, and how that increment adds to the cumulative. Nor does the DEIS identify how future actions add their increment to the grand sum of cumulative impacts for the individual resource parameters. For example, the DEIS states that the "potential cumulative impact to groundwater are negligible." Yet the DEIS presents no times series of data that shows groundwater quality testing since active mining in the region. Further, the cumulative impact on water resources as a whole fails to define a regulatory cap, grand sum of past, present and future actions, and how mitigation would offset the present action, regulations caps, etc.</p>		<p>environmental impacts are fully disclosed in Chapter 4 of the EIS and are summarized in Sections 5.4 through 5.18 of the cumulative effects analysis, including the incremental change in cumulative impacts. Taking as an example a resource of stated concern by the CTGR, Cultural Resources, Sections 5.13.1 through 5.13.4 describe the specific past, present, and reasonably foreseeable actions that have and will impact these resources through surface disturbance. Section 5.13.5 then describes the incremental impact caused by the Proposed Action and relates this impact as a percentage of the CESA and of the increase in impact (surface disturbance) within the CESA. For the groundwater resource, the direct and indirect impacts to groundwater quality are disclosed in Section 4.2.2 of the EIS are concluded to be unquantifiable and negligible to minor while the impacts to water availability are quantified and considered to be minor. The lack of groundwater quality impacts indicates there would not be a cumulative impact from the Proposed Action. Section 5.5.6 of the EIS also provides a description why the water use for the project would present a negligible cumulative impact.</p>

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150.47	Confederated Tribes of the Goshute Reservation	For air resources, the regulatory cap is not defined for cumulative impacts. The grand sum of impacts is not clear, yet the DEIS purports that "there would be no meaningful change in cumulative impacts to air quality under the two action alternatives or the No Action Alternative." DEIS at 5-45. The DEIS does provide estimations of CO2 emissions for the Pan Mine Area, Nevada, the US, and the world; but it does not give the regulatory cap and does not provide the incremental increase of GHGs at Pan Mine and surrounding area for the multitude of projects that have taken place, or future projects, on federal lands.	CE	Cumulative impacts are predicted with air dispersion modeling for criteria pollutants that have an EPA defined limit. Table 4.6-1 lists the air quality standards that were used as a cumulative impact assessment tool. These limits are standards that the EPA developed to protect the public health and the environment. The modeling analysis compared the predicted maximum impacts with these limits and found that the impacts were below the national and Nevada specific standards; therefore impacts are minimal due to emissions from the project at all points accessible to the public. CO2e emissions are all GHG emissions reduced into one comparable chemical, carbon dioxide equivalents. There are no current standards or limits for GHG emissions. There is uncertainty how specific GHG emissions affect climate change or how a specific change in local vegetation will affect climate change. Due to this uncertainty there have been no standards developed to compare project related emissions with in order to describe the cumulative impact. Additional information has been added to the EIS to describe in general the potential changes that may occur to local environmental resources due to climate change.

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150.48	Confederated Tribes of the Goshute Reservation	The cumulative impact analysis of vegetation is flawed. The DEIS purports that passed reclamation activities have successfully reclaimed lands. However, this is not really the case because the reclaimed lands remain largely in the disturbance, condition, or comprising the original negative vegetation community before disturbance occurred. (See DEIS at 5 – 46). The DEIS subtracts reclaimed land from the total disturbance area. This is an incorrect approach because the disturbed lands and reclaimed lands have gradations of reclamation – they are not fully reclaimed so they cannot be treated as such.	VEG	Vegetation structure and composition would be altered in disturbed and reclaimed areas. Mine reclamation is primarily based on stabilizing the land for the long-term and providing for a post-mining land use, even if it is not the same as the pre-mining condition. An altered type of potentially suitable habitat would be available after reclamation activities and could be considered successful. Since reclamation would not provide or replace pinyon-juniper trees, at least in the short-term, some of the reclaimed areas would not resemble the current habitats, thus reclaimed areas may provide suitable habitat for different species and uses than currently apply. Additional text to reflect this has been added to the FEIS.
150.49	Confederated Tribes of the Goshute Reservation	The DEIS does not adequately identify cumulative impacts on any of the resources. While some potential effects were addressed, unspecified effects remain as described above. In several cases, the DEIS fails to adequately evaluate cumulative impacts because effects from these activities within the CESA have not been quantified by the land management agencies as quantification is very difficult. (see DEIS at 5-53) Because quantification is difficult does not release the Federal agency from conducting the proper impact assessments.	CE	Under NEPA, there must be a good faith effort to explain effects that are reasonably foreseeable. Chapter 5 includes the information that is readily available from public records and can describe the past, present, and reasonably foreseeable actions within the various CESAs.
150.50	Confederated Tribes of the Goshute Reservation	Furthermore, the Project area that has seen 150 years of degradation from mining activities and other impacts is not given the proper cumulative impact assessment especially for cultural resources and Native American concerns and traditional values. With the history of mining and associated environmental assessments in the region, the BLM made little effort to use those earlier assessments to conduct a meaningful cumulative impact analysis. The BLM also failed to examine how many other projects and disturbances might impact the subject area, and how impacts might spread to other regions such as to Duckwater Tribe's Reservation and Expansion Area. As is, the DEIS failed to conduct the appropriate cumulative impacts analysis for individual resources and on the whole. The cumulative impacts section of this DEIS is replete with examples of noncompliance. At minimum, the BLM must address the cumulative impacts analysis at a level of adequacy and then redistribute the DEIS for public review and comment.	CE	Chapter 5 presents numerous past and present mining activities and disturbances within the different CESAs, as well as other identifiable disturbances. Resources analyzed for cumulative effects are based on whether there would be any direct and/or indirect effects on those resources from the proposed project (Section 5.1). If there are no direct or indirect effects, there cannot be a cumulative effect.

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150.51	Confederated Tribes of the Goshute Reservation	<p>XIV. Failed to Conduct Government-To-Government Consultation: Federal mandates and orders require the BLM to consult with our Tribe in an appropriate government-to-government manner. In accordance with the NHPA (P.L. 89- 665), the EPA (P.L. 91-190), the FLP\1A (P. L.94-579), the AIRFA (P.L. 95-341), the ~AGPRA (P.L. 101-601), ARPA (P.L. 96-95), EO 13007 (Indian Sacred Sites, 1996), and EO 13175 (Consultation and Coordination with Indian Tribal Governments 2000), Department of Interior Secretarial Order 3317 (December 1, 2011), and other laws, the BLM must provide affected Tribes, organizations, and/ or individuals an appropriate opportunity to participate in, comment, and consult on proposed actions that might impact resources, sites, or activities of concern. Through appropriate government-to-government consultation with Tribes, BUA must attempt to identify specific traditional/cultural/spiritual sites, activities, and resources and limit, reduce, or possibly eliminate any negative impacts. The BLM failed to act in a government-to-government consultation manner with our Tribe, failed to share relevant cultural resource/ prehistoric information from their Class I and Class III cultural resource inventories, and failed to provide our Tribe with a reasonable opportunity to participate in determining and protecting eligible properties under ~HPA and sacred sites under EO 13007 and AIRFA/ RFRA. This precluded our Tribe from having a fair and reasonable opportunity to resolve cultural resource conflicts associated with this Project. The federal government is charged with moral obligations of the highest responsibility and trust. Its conduct, as disclosed in the acts of those who represent it in dealings with the Indians, should therefore be judged by the most exacting fiduciary standards. Seminole Nation v. United States, 316 I.J.S. 286, 296-297 (1942). The trust responsibility restrains government action that affects Indians and therefore is an important source of protection for Indian rights. This trust responsibility applies to all federal actions or projects and agencies that occur beyond Indian reservation boundaries. The Tribes have the right to maintain their religious practices in the same place and in the same manner as their ancestors have since time immemorial. The federal government's trust responsibilities to the Tribe are such that government actions must prevent adverse impacts on American Indian religious beliefs and practices, and to protect the spiritual lives of tribal members now and into the foreseeable future. In this case, the BUA has failed to uphold its trust obligations to the Tribe. Furthermore, the BLM has not complied with numerous Executive Orders that apply to federal agency actions and are specifically designed to protect Indian interests. E.g., EO 13007 (agencies must "avoid adversely affecting the physical integrity of such sacred sites"); EO 11593 (agencies shall "administer the cultural properties under their control in a spirit of stewardship and trusteeship").</p>	NAC	<p>On June 7, 2012, letters soliciting information from Native American Tribes and inviting the Tribes to enter into consultation for the proposed project were sent by the BLM to the 11 Tribal governments (Section 3.12.3 of DEIS). The BLM conducted a consultation and information meeting with the Tribes on July 2, 2012 at the BLM Office in Elko. At that time, the BLM tribal liaison and the project manager met face-to-face in a meeting with the Duckwater Shoshone Tribe representatives to discuss sage-grouse and mining activities north of the Duckwater Reservation. On August 10, 2012, the BLM met with the Yomba Shoshone Tribe to discuss the project. The Yomba Shoshone Tribe expressed concerns with impacts to groundwater and applicable mitigation measures. As the Duckwater Shoshone Tribe and CTGR did not express any specific concerns before the public comment period, additional meetings and consultation have not been conducted in the interim. Tribal comments on the DEIS are addressed in the FEIS. If Native American concerns emerge through consultation, BLM will continue to consult with the appropriate Tribe(s) and individuals to obtain information about those concerns, such that BLM can determine an appropriate course of action taking that information into account.</p>

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150.52	Confederated Tribes of the Goshute Reservation	XV. Concluding Remarks. Our Tribe has identified that the Pan Mine Project Draft EIS is significantly flawed in the development and analysis of alternatives, conformance with land use plans, and disclosure, analysis and mitigation of impacts on resources important to our Tribe. The DEIS delivered a multitude of "negligible" determinations that were not supported by evidence. Moreover, the mitigation often was insufficient for the impacts described, and cumulative impact assessments were replete with errors. Given these flaws, the BLM must either correct the DEIS and recirculate for public comment and review, or not permit the Pan Mine Project. Our Tribe appreciates the opportunity to provide comments on the DEIS and who look forward to the BLM, as federal trustee, ensuring that our tribal interests and resources are protected.	GEN	Statement noted. See responses to Comments 150.2 to 150.50.
151	Dave Costello, President WP Chamber of Commerce	The White Pine Chamber of Commerce Board of Directors voted unanimously to send a letter of support on the above named project. Midway has been a strong supporter of many, many activities throughout White Pine County. They hold public meetings to keep the citizens up to date informed as to their progress. We wish to endorse the DEIS and express that there are many reasons that this project is important to the business community of White Pine County. First and foremost is the jobs that will be created during construction and then when production begins. The added revenue that will be brought into the County through purchases and taxes. We agree with Midway about the Waste Rock Disposal site Design Alternative.	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
152	Kenneth A . Brunk, Chairman, President & CEO Midway Gold	Two identical comments were sent in, please refer to comment number 83.		Comment noted. No response required.

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153	Eleny Carrion Mentaberry, Eureka Business Network Chair	Dear Mr. Kreidler, As Chairwoman of the Eureka Business Network (EBN), I am writing this letter of support for Midway Gold's Pan Mine Project located in White Pine County, Nevada. The EBN is a local organization that meets monthly to discuss local economic issues and business related topics. EBN membership is comprised of businesses in Eureka County and our members seek and support economic development and diversification. During the Pan Mine permitting process, Midway Gold has proved itself a good neighbor by contributing generously to the community and by participating in various business and community development projects. The development of the Pan Mine would provide long-term employment for area residents and generate income for local businesses. The town of Eureka needs an infusion of new residents, new businesses, new housing development and new jobs. Please accept this letter of support for Midway Gold and the Pan Mine from EBN as testimony from the EBN members that voted in support of this letter for the Pan Mine Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
154	Shane Bybee, GM/Secretary	Dear Mr. Kreidler: I present you with these comments on behalf of the three principals of M.B. Bybee Co. Inc., DBA The Ramada Inn & Copper Queen Casino, 805 Great Basin Blvd. Ely, Nevada 89301, M.B. Bybee, President, Marl B. Bybee, Vice President and Shane A. Bybee, Secretary. It is our sincere feeling that the Pan Mine will introduce many high paying jobs, directly and indirectly, into Ely and White Pine County. These jobs will have an immense impact on the economic future of our small community. These jobs are only part of what Midway offers our community. Midway Gold has already become a powerhouse of community involvement with the small workforce they have employed for the permitting stage of this project, we are excited to see the benefit they will provide our community when their staffing reaches full force! Ely and White Pine County have a strong tradition of responsible mining, it is our feeling that Midway is committed to this tradition. Midway's commitment to the mitigation of sage-grouse and other wildlife habitat impact has been, in our opinion, exemplary. The hours of research and the millions of dollars invested into alternative waste rock disposal solutions, road location and habitat protection demonstrate Midway's commitment to responsible mineral production. We at the Ramada Inn & Copper Queen Casino wholeheartedly support the opening of the Pan Mine and wish them a bright future.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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155	Frank Dalia Underhill	Dear Sir, It is most important to Nevada to allow Midway Gold to put its Pan Mine in production. Few residents in Nevada realize our #1 industry is mining not casinos. Mining brings educated people to the state, engineers, lawyers, geologists and pays the highest wages in Nevada. These are not service jobs as the casinos bring in as dealers and dish washers. We in Nevada need mining. Please bring the mine in ASAP and not have the long power line. You try to raise funds today. Midway will have to borrow from the public. The banks will not lend funds it can raise money. Nevada is lucky to have Midway and who else would drop into our state and give us 150 jobs. Please go with this and not the long power line.	POS, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
156	Kenneth A. Brunk, Chairman, President & CEO Midway Gold	Two identical comments were sent in, please refer to comment number 14.		Comment noted. No response required.
157	Scott Raine	Dear US Government: I am writing this letter of support for Midway Gold's Pan Mine Project located in White Pine County, Nevada. During the Pan Mine permitting process, Midway Gold has proven itself to be support of Eureka. I have every reason to believe that Midway Gold will be a positive influence on our community and Nevada. I am an educated avid outdoors man and wildlife advocate who has spent a lot of time in the vicinity of the mine project and the agreed upon mitigation of wildlife is far more than sufficient, to the point of being more of a burden on the mine than necessary. I do not believe that the mine will have significant negative impact on the wildlife in the area. The development of the Pan Mine will provide long-term employment for area residents and generate needed income for local businesses. Please accept this letter of support for Midway Gold and the Pan Mine as testimony in support of the Pan Mine Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
158	Renee Baker, Chairwoman White Pine County Community & Economic Development	Dear Ms. Thomas: White Pine County has been home to a number of mining companies since the early 1900's. Mining in general has provided a stable economy for White Pine County for many years. Since the initial location of Midway Gold to White Pine County, the company has proved to be a good neighbor. The company has worked closely and partnered with the citizens, civic groups, businesses, and government bodies for the sustainability of White Pine County. The White Pine County Economic Diversification Council appreciates the close working relationship that Midway Gold has established with White Pine County and its residents. The White Pine County Economic Diversification Council supports the Midway Gold Pan Project. The Midway Gold project will enhance the mining activity in White Pine County. If you should have any questions, please feel free to contact our office at 775-293-6562.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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159	Warren & Julie Krch	<p>To Whom It May Concern: The purpose of this letter is to support the efforts of Midway Gold to establish a working mine in White Pine County, Nevada. Midway's efforts to date are indicative of a project that will become a major part of the lifestyle that we enjoy in our community. My wife and I have lived here in rural Nevada since 1968 and made our living as educators in the local school system. I worked summer jobs in the mining industry for nearly 25 years and am very aware of the contributions that mines make to our local and State's economy. I was always proud to work shoulder-to-shoulder with White Pine graduates. That experience led me to positions in our District's school administration system and brought me to understand the symbiotic relationship that can exist between mines and communities. My wife worked for 30+ years in a local parochial school until its close years ago and then the public school system. She is currently establishing a charter school that will be able to educate many of the children brought by the mine to our area. With mining's unselfish efforts in the past, White Pine Schools have flourished and have produced many admirable citizens, consumers and contributors to society. Midway's revenues will continue that trend! Midway Mines have quickly established themselves as community members and progressive leaders. They have already done a great deal to aid school's efforts here in Ely. It is quite apparent that their community support will continue to expand as their operations flourish and prosper. It is also apparent that Midway is a company that is interested and invested in conserving the beauty of the natural resources that makes our county unique in Nevada. We greatly admire their efforts to this point in time. We attended a meeting of our local Shoshone tribal council and were privileged to be present during a Midway presentation by Roger Gross and Andy Britton. They were describing the Pan Project's progress to this point. We thought they were very reassuring to the council. They enumerated all that they were doing to preserve the sanctity of the Shoshone ancient areas and the painstaking work to be done to ensure that the Tribe's concerns would receive the highest priority. We heartily endorse Midway's efforts to contribute to this area's stability and prosperity. We admire the sincerity of their contributions to this point and are confident that they will energize our economy and future. There is no doubt that their contributions as a mining company will also have a positive national impact. They should be supported in these efforts.</p>	POS	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>
160	John & Irene Chachas, Agent/Broker Farmers Insurance	<p>Congratulations to Midway Gold Company, the investors and employees for their accomplishments and a big "thank you" for the investment in White Pine County. The window of opportunity for a mining venture is short lived and time is of the essence to make a project successful for everyone involved. I acknowledge and respect the permitting process that a mining company must endure, but stress the need for diligence in placing these procedures on a "fast track" process. We live in an extremely challenging economic environment and cannot hinder any kind of potential economic growth in White Pine County. We all can appreciate how</p>	POS	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>

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		<p>difficult it is to entice new industry into this community. As a sixteen year veteran County Commissioner, and Irene, being a twelve year veteran White Pine County School Board member, we support this investment and welcome the stimulus it brings to our business community, the appreciation in real estate values, increased enrollment in our school system and fortunately, for the current elected officials, the bountiful tax dollars provided to their operating budgets. As business owners in White Pine County, Irene and I pride ourselves as survivors of the local economic roller coaster and can be identified as "endangered species" while living and operating businesses in Ely, Nevada. We plead for intelligent and progressive processing of Midway Gold's applications and look forward to the celebration at their ground breaking ceremonies.</p>		
161.1	Laura Baldwin	<p>Dear Miles, As you likely know, I am a geologist for Midway Gold. I have worked on the Pan project since moving to Ely for my job in October of 2010. Naturally, I am somewhat biased in favor of the Pan Mine opening, as my job is potentially contingent upon the success of that single project. However, I am not writing to you today as an employee of Midway, but rather as a citizen of Ely, White Pine County, and the Great Basin area. I have always lived in areas where mining is an important part of the community. I grew up in a part of Idaho situated between the phosphate mining in the east and the metals mining in the central part of the state. I went to college in northern Idaho, not far from the Coeur d'Alene mining district. In graduate school, I lived in Indiana where facing stone, crushed stone and gypsum mining operations are common. The economic benefits to the communities are clear. They provide jobs, diversify the economies and create revenue at various levels. Clearly the Great basin is no exception to this. Ely has suffered the fluctuations of the metals market for years. The employment in Ely is split into several major sectors. There are those who work for the prison, those who work for "Robinson"-regardless of who owns it, those who work for Barrick, many who work for the government in some capacity and others in supporting services and gaming. My husband was born and raised here and recalls the periods when "the mine" was open and closed. That was one of the main factors to the success of Ely as a whole. Diversification of the local economy, both in terms of the commodity being produced, and the major employers will help to stabilize the community and Midway is in a position to provide that to us. As stated in the Draft EIS, the addition of nearly 150 new jobs would be a significant boon to a restless workforce. In my opinion, the Pan mine would benefit my family directly by creating a better community in which to live and work. My husband and I also own a small handy-man business here in Ely. I know that the creation of more good-paying jobs and a more stable economic situation would benefit our business by creating more work and helping us expand. I think that another big employer would help all of the local businesses thrive. When the local economy is depressed, everyone tightens their belts and settles in for hard times. Spreading</p>	POS, SUP- WRDA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>

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		<p>out the employment would mitigate that effect so that businesses can keep their doors open. That would make Ely and surrounding communities more desirable areas to settle, raise families, retire, live, work and play. In terms of the environmental impacts of the Pan mine, I think that Waste Rock Disposal Site Design Alternative is an excellent design. I have had the opportunity to thoroughly study the Proposed Action, the Southwest Power Line Alternative (SPLA), and the Waste Rock Disposal Site Design Alternative (WRDSDA). The WRDSDA has a slightly smaller overall footprint, and provides improved mitigation measures for greater sage-grouse, in addition to being an economically feasible option. It is my personal belief that the original design was made using the best information available at the time, but that as the issue of sage-grouse became more serious the WRDSDA was initiated to have an increased mitigating effect. I think that the increased negative effects of the SPLA in terms of greater emissions, disturbance, and increased cost of the design on the initial capital expenditure outweigh the marginal benefits to the inactive Northeast Blackpoint lek.</p>		
161.2	Laura Baldwin	<p>I understand that the only choice to avoid all further impacts would be the No Action Alternative. From personal experience, I do not believe that this is a realistic option. In my opinion, most of the historic cultural sites and roads on the Pan Project location are from historic mining activities. More recent disturbance dating after the 1979 discovery of the deposit by Lyle Campbell is in a variety of states of reclamation. I think that Midway's progressive attitude to reclamation and environmental stewardship suggests that with the approval of the Pan Mine, the land can be restored to its former level of productivity when mining ceases. The adage that "if it can't be grown, it has to be mined" is true. If I could pick a place to put a low-impact gold mine, it would be Pan, and therefore, I am in support of the project. I would encourage you to entertain the idea of a museum-type exhibit highlighting the historic cultural resources including the Lincoln Highway and specifically, the Carbonari sites as a mitigating measure to the degradation of the original historic cultural resource. Such an exhibit could be at a museum like the White Pine Public Museum, or at a road-side turnout highlighting the past, present and future of mining at the Pan site. This would not need to be included as a measure in the Final EIS, but I think it would be a very interesting exhibit as a benefit to the community and a tourist attraction. I believe in the mission of the BLM: "It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations." I believe that the overall Pan Project, and specifically the mitigating measures and designs proposed with the Waste Rock Disposal Site Design Alternative are in line with the mission of the BLM. I think that the socioeconomic benefits and slight environmental impacts outweigh the negative effects of a new mine. Thank you for considering my ideas and opinions on the Draft EIS. I hope that you do everything in your power to bring the mine to fruition.</p>	POS	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>

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162	██████████	This mine should be approved. I'm all in favor of this project so please approve it. It will help bring more jobs and people to White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
163	Debbie Francone	I am in favor of the EIS. We need all the help we can get. Thank you.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
164	Larry Dunton	A project this size can have no impact except financial. We have lived here almost 60 years and would like to live her until we die. The financial impact could help that happen. Mining is always a gamble with every many outside impacts like government regulation. Don't kill this and our community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
165	Merlin Searle	I am for Midway Gold Pan Mine Project it's more jobs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
166	Peggy Romero	Yes, I want Midway Gold Pan Mine Project. It will create more jobs in our community & Midway Gold is an asset to our nonprofit organizations they are very giving to all our programs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
167	Charles Kitchell	Heavy equipment operator need a job.	POS	Statement noted.
168	██████████	(No comment - comment sheet is blank).	-	
169	Rich McAnany	This project is a good thing for all of Northern Nevada.	POS	Statement noted.
170	Roy Allen	Mining has been a big part of White Pine County and we need it to help the County out of its slump. I think that they are more than their part for the EIS. So let's get our country back to work. Thanks	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
171	Chris Matson	Nevada is mining-the stud state for it. This mine would make our economy better. That always helps! My opinion: this mine should get on line ASAP.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
172	Doug Salisbury	We need more jobs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
173	Ron Williams	Issue 4-honest proven research to determine measurable impacts. No impact on livestock grazing issues.	POS	Statement noted.
174	██████████	Mining is a great source of economical growth for Nevada by creating jobs and revenue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
175	Rick Wade	Want people to go to work tax money to stay in White Pine County. Mining is very important to this state and this county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
176	Carmella Dearborn	I have been out of work for six months. A mine would boost the economy in this town. It would be nice to have more jobs available.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
177	F. Jean Kneese	WP County needs all the tax revenue and employees it can get. Too many small businesses are closing for lack of customers. More employees equals more customers. I have little concern for "endangered species". Humans are becoming an "endangered species" if all the environmentalist get their way. We need the jobs-the income!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
178	Alan Zimmer	Nevada is mining.	POS	Statement noted.
179	Rene Drzklyen	Increase tax revenue & more jobs in White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
180	Kim Stevenson	More jobs for White Pine.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
181	Robert McDonnell	Nevada is about mining.	POS	Statement noted.
182	Violet Thompson	The "Silver State" needs the revenue and jobs!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
183	Sandy Salisbury	More money for White Pine Co.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
184	Todd C. Wilkin	Mining has been an important part of rural Nevada economics for several decades. As long as there is a continued need and market for precious metals, we should continue to mine these resources that we have in this county. This will continue to help support our local economy with jobs. I am in favor of the Midway Gold Project going forward.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
185	Penny Deklyen	Increase revenue and more jobs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
186	Kerri Pintar	Please accept this comment as my acknowledgement of support in permitting Midway Gold so they may bring employment opportunities and growth to White Pine County once they are operational. Your expedience in processing your findings is greatly appreciated so as a community we can begin to move forward with opportunities presented to us.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
187	Judy Ortiz	Nevada has always had mines. We need this project for White Pine County.	POS	Statement noted.
188	Diann Martin	Nevada is historically a mining state. We need more jobs in rural Nevada especially. I'm all for mining.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
189	Steve Lundgreen	White Pine County needs the job opportunities that it would bring to help increase the economy.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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190	Ronald Gallegos	I work cement for a living for Gallegos some jobs.	POS	Statement noted.
191	Justin Ortez	More jobs & revenue	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
192	Brian J. Peart	I have been a lifelong Nevadan and I would really like to see this mine come into production as well as all mining in White Pine County and Nevada for revenue for the County. I have also been a lifelong hunter and miner and I do not see any harm to sage-grouse. Please let's not miss this opportunity.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
193	Selenda Snodgrass	It is in the best interest of White Pine county and the State of Nevada to allow this project to move forward. Not only is mining intricate to Nevada's heritage, it would contribute to the tax base as well as provide jobs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
194	Lee Epperson	To bring more jobs and money to our county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
195	Lee Duvall	I would like to see more revenue and jobs in WP county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
196	██████████	Mining is good for Nevada economy and the United States economy. The small amount of land need for the pan mine to operate will have very little effect on the sage-grouse.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
197	Michael Kneese	If you can't grow it you have mine it-yes I believe in mining in White Pine Co and we need the money in our country.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
198	Kathy Dean	My brother is a major bird hunter and we believe Sage hens are just fine! Our county needs the revenue and the jobs! Please don't drag your feet on this issue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
199	Mike Lamoreaux	White Pine County needs the tax revenue and the jobs.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
200	Tony Whilten	It works for Nevada.	POS	Statement noted.
201	I. Claire Morrow, Ruby Mountain Realty & Appraisal Service	Dear Sirs, I was over to Ely again yesterday which is 77 miles from me here in Eureka. Regarding the Midway's Pan Mine Project which is closer here to Eureka than Ely, I would like to make the following comments! I feel the mine would make the highest and best use of the land as it is described. Eureka with a population of some 900 people, no doctor or hospital in the whole county of Eureka, no pharmacy, two little gas station, one small grocery store-this town certainly needs a boost. The added employment and activity would be of benefit to this area and help the economy. Sincerely yours, I Claire Morrow, ARA	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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202	Peter G. Morros	<p>My name is Peter G. Morros, born in Ely, Nevada and presently residing in Reno, Nevada at 1455 View Crest Ct 89511. I have attached a brief summary of my background and experience in natural resource disciplines. I am a native Nevadan and have had the good fortune to enjoy and benefit from the abundant natural resources in Nevada, particularly in White Pine County. I spent my childhood in Old Ruth, Kimberly, Riepetown and Ely way before the population in Nevada reached 1 million people. Having said that, here are my comments on the Pan Project DEIS</p> <p>1) Midway has the followed the guidelines set forth in the NEPA process, related to identifying and analyzing potential environmental consequences of the project and the alternatives based on the information available to me. I believe they have supported and encouraged the public input in the process. They will have the responsibility of responding to all comments of merit in the final EIS process.</p> <p>2) The economic impact of the project will be, first the number of jobs it creates and as Midway states the multiplier effect of additional support jobs and services in Nevada's rural counties along with tax revenue which has been responsible for reviewing economic conditions on more than one occasion. The town and county of Eureka is a prime example of what mining can do for a rural county economy. The creation of 150 jobs in the project alone may appear to be a drop in the bucket in a large metropolitan area, but in Nevada counties where the population is +/- 10,000 people the impact is significant. Additionally the income from the net proceeds tax will also have a significant impact on the infrastructure. High expectations can be stabilized by a strong economy. White Pine County has come through some difficult times economically since Kennecott Copper shut down mining operations in 1977. In recent years the economy has stabilized again because of operating mining projects.</p> <p>3) There have been some major issues related to the listing of a native bird to Nevada-The sage-grouse. Wildlife Habitat is important to all wildlife and should be protected. Any mining project located in Nevada has to be sensitive to wildlife habitat. The sage-grouse issue is effected by several conditions including but not limited to, wild land fires, wild horse populations, range use, hunter pressure and wildlife management. Finding a balanced plan that can address these issues is not easy and will take time. A coordinated effort to address this effectively by all involved is necessary including by not limited to mining industry and government regulating agencies.</p> <p>4) Nevada has the most comprehensive and effective ground water law and regulation of all the western states. A water supply to support the project will be ground water from the Newark Valley or Northern Railroad ground water basin. These basins have had some development of the ground water resource for agriculture and previous mining operations. At the present time these basins are not designated under the provisions of NRS chapter 534 as in need of additional administration. The administration and enforcement of the Nevada water law is under jurisdiction of</p>	POS, SUP- WRDA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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		<p>the Nevada Division of Water Resources commonly known as the Nevada State Water Engineers office. I don't see any insurmountable hurdles to obtaining an adequate water supply to support the project once an operational plan is provided by Midway addressing such issues as projected annual use including plant and processing losses, dust control, consumptive use, recycling and other issues requested by the regulating agencies. Jobs and Revenue: I agree with Midway that jobs and revenue are probably the most important element. The socioeconomic benefits outweigh the potential environmental impact which Midway should keep within acceptable limits. A mining operation cannot exist without some disturbance. sage-grouse Mitigation: Midway's statement on the sage-grouse issue is correct. Midway also supports "well-founded and proven research", to fully understand the issues and impacts. They have committed to support appropriate mitigation as long as it is supported by appropriate research. I concur with this commitment by Midway and they should be expected to take an active role in the process. Waste Rock Disposal Site Design Alternative: Midway has taken the right step in supporting this disposal alternative included by the BLM in DEIS.</p>		
203	Steven C. Borell, Borell Consulting Services, LLC	<p>Dear Mr. Kreidler, The Midway Gold Pan project provides a great economic opportunity for the immediate future for this area of Nevada. This is unique for the Nation right now when quality, skilled jobs are so badly needed. I support the Waste Rock Disposal Site Design Alternative and the Southwest Power Line Alternative. Both of these alternatives are better from the standpoint of both potential environmental impacts and at the same time they are less costly for the mine. Other waste rock and power line alternatives would have greater land disturbance and greater potential impacts on sage-grouse habitat. I urge that the Record of Decision be published at the earliest possible date that will provide a legally defensible decision.</p>	POS, SUP- WRDA, SUPP- SWA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The effects of the WRDA and power line alternatives are discussed in the EIS.</p>
204	Thomas A. Bath	<p>Mr. Kreidler; I would like to support the Draft Environmental Impact Statement with the #3 Waste Rock Alternative. This mine will have even more of a benefit to the city and County. I am pleased the amount of community involvement they have done up to this point. As this area is a mining area the additional jobs, taxes and involvement will make our areas even better. My family came to this area in 1905 from Colorado which was another mining area. We have been through many economic and social challenges. This mine will help stabilize and improve the area. As far as environmental impacts, the draft identifies these and I feel they have been addressed. The sage-grouse in that area is small as the water is 800' below the surface. I am a lifetime member of the Lincoln Highway association. The road through the property has been addressed. Midway Gold has been up front and very responsive to this and other issues. Please contact me if you have any questions.</p>	POS, SUP- WRDA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.</p>

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
205	Cindy and Bill Gee	<p>For many years we have been following Midway Gold and the Pan Project, as well as other similar projects in Nevada. We are pleased to see this project advance and are appreciative of the opportunity to provide the BLM with public comments on the DEIS. This project currently provides significant employment in the area to support the mine planning and permitting efforts. Moving the project forward will ensure continued employment as well as providing additional employment opportunities. The positive economic impact of the Pan Mine is significant and multifaceted: the majority of the workforce will be hired locally, property taxes will generate additional revenues locally and the purchases made in Nevada are expected to total in the many millions of dollars annually. The ripple effect of these revenues will be felt across Nevada. In addition to the many positive economic impacts stemming from development of the Pan Mine, Midway Gold's development plans are responsible and environmentally sensitive. The Waste Rock Disposal Site Design Alternative is preferable since it will decrease overall land disturbance as well as affect less preliminary general habitat for the sage-grouse. The Southwest Power Line Alternative is a much less desirable alternative since it greatly increases overall land disturbance (at greater cost) as well as potentially increasing impacts on other wildlife habitats. We encourage the BLM to approve the DEIS and support Midway Gold's efforts to move forward with this project expeditiously. Midway Gold has demonstrated a commitment to the area and an intent to mine responsibly with minimal impact and maximum benefit to Nevada and the public lands.</p>	POS, SUPP- WRDA, OPP-SWA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The effects of the WRDA and power line alternatives are discussed in the EIS.</p>
206	Joe Spink, Business Development Manager Granite Construction	<p>Mr. Kreidler: Granite and our subsidiaries provide construction services in mining, earthwork, water resources and sewer infrastructure, power transmission and distribution, tunneling, rail, underground/utilities, roads, highway and bridge construction. In addition, Granite, as one of the nation's leading producers of construction materials, utilizing both stationary and mobile crushing and processing facilities, operates multiple aggregate mining operations and asphalt and ready-mix plants that produce specialty aggregates, sand, gravel, ready-mix and asphalt concrete and other construction materials that support the construction industry. Granite, utilizing our expert construction professionals, highly trained crews, and significant equipment resources, has been providing mine development support services since 1977, helping mining clients continue profitable operations, while completing expansion, reclamation, and maintenance projects on time and on budget. As Granite's Business Development Manager for our Northwest Operating Group, I want to express the company's support of the Midway Gold Pan Project. The Pan Mine is good for jobs creation, and with the stated objective of hiring locally and from Nevada-based entities, we at Granite are excited about the work opportunities this mine development offers. In consideration of the Proposed Action and the two Alternatives outlined in the DEIS, I have these comments: Granite supports the Waste Rock Disposal Site</p>	POS, SUP- WRDA, OPP-SWA	<p>Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The Southwest Access Road is not an action alternative evaluated in the EIS.</p>

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
		Design Alternative. Decreased land disturbance; least effect on sage-grouse and other wildlife considerations; and decreased visual impacts. Granite opposes the South West Power Line Alternative. Although building and an approximate 32 mile power line (Alternative) as compared to the approximate 8-mile route is attractive, Granite has concerns that the longer route has far greater impacts to: Employee and contractor safety (4 times the distance); increased negative visual impacts; reduced grazing; greater effects on diverse wildlife habitat. Granite looks forward to the development of this mine project in eastern Nevada, and the opportunity to be one of the local contractors working on the construction phases.		
207	Jon Hickman, Mayor City of Ely	Dear Mr. Kreidler; As Ely City Mayor, I, along with the City Council Members, unanimously support the Midway Gold Pan Project. The Midway Gold Pan Project will bring many new jobs to our area; jobs that provide a cash flow that supports business growth and an increased tax base will help stabilize the ups and downs of the local economy. Midway Gold's work on sensitive environmental issues is a clear illustration of their willingness to protect wildlife and to use modern mining methods to minimize land disruption. Please let this letter become part of the final record "in support" of the proposed mining operation at the Pan Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
208	Thomas A. Bath, President	Mr. Kreidler, We have been in the motel business since the 1950's. Mining, tourism, and business travelers have kept us in business. The many consultants and workers this mine has been very positive for us. We need this actively to support the services in the community. We definitely support the EIS for Midway Gold Pan Mine EIS. We feel the Alternative Design would be the best. The wildlife mitigation is good so long as it is supported by reasonable solutions.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
209	John C. Gianoli, President First National Bank of Ely	There are three items of primary concern for our country, state and community. In order of importance they are the economy, the economy and the economy. I was born, raised and now work in White Pine County. I have an abiding love for this area and the pristine beauty it possesses. I would not support any project that I believed would negatively impact our environment not only for myself but more importantly for my children and now my first grandchild. That said, we need to become more supportive and respectful of small business in this country as two out of three jobs are created by small businesses. I have witnessed numerous mining companies come and ultimately leave town. Midway has shown more interest and concern for the community than any I have seen in the last thirty five years. I have personally witnessed this involvement at many community functions. I have been told that Midway will employ approximately 129 people at their Pan Project. This would be a boost to our local and state economy. Nevada's latest unemployment rate is 10.2% (most likely understated) which is a major hindrance to the state fiscal health and wellbeing. the Pan Project is located on the an existing mine site, creates very little new imprint on the landscape and is not visible (six miles) from highway 50. For the betterment of	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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		our community and state I support the efforts of Midway gold at their Pan Project and trust they will be given every appropriate opportunity to bring their project to fruition.		
210	Les Baker	More jobs and revenue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
211	██████	Don't mess it up!! It's another chance to do better.	POS	Statement noted.
212	David R. Pritchett	One plain fact: more jobs and revenue for our county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
213	Patricia Jackson	Our economy would benefit from the jobs and revenue this project would produce. We need this to happen.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
214	James Crigger	I think the mine would be good for the town.	POS	Statement noted.
215	Craig Hendrickson	I am for all legal mining, been a miner for half my life.	POS	Statement noted.
216	Susan Sims	I believe the Midway Gold Mine Project would be an asset to our community. Providing jobs and revenue for our community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
217	Marie McIntosh	I'd like to see the mine open so we can have revenue for our county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
218	Walter Ebquist	I want it open! I want jobs. I want everyone to have to have a job!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
219	Wes Radford	White Pine County needs the revenue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
220	██████	I just moved here and I would like more job opportunities.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
221	John Forman	Nevada is mining.	POS	Statement noted.
222	Bill Reed	Nevada is mining.	POS	Statement noted.

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223	Keith Van Vranken, H&E Equipment Services Inc	It is my understanding that the public commit period is open for the Midway Gold Pan Mine? May I state my support of this project? Our company, H&E Equipment Services, has two operations in Nevada and one in Utah that support the mine industry and this project would go a long ways to enable us to maintain the employees we now employ plus the possibility of adding new workers. I understand that there are also two routes for both mine access roads and to supply electric power. I also support the shortest & least disruptive route to our land for these purposes. May your quick approval of this project come shortly.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The Southwest Access Road is not an action alternative evaluated in the EIS.
224	Thom Seal, PhD, PE	Support mining and mining and Mineral Policy Act of 1870. Good jobs-minimal environmental impact. Taxes for Nevada-sales taxes. Jobs for Northern Nevada!!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
225	Bruce Setterstrom	As a citizen of Ely I am totally in favor of this mine project. I can see no downsides to Midway Gold's plan. Without mining our state in the Northern half would be worthless. If it isn't grown then its mined. This is a mining state & it should be easier to obtain permits faster. Thank you for allowing me to be a part of this process.	POS	Statement noted.
226	Laura Rainey	I have been present at two of your presentations and I believe your plans sound good. I wish you well.	POS	Statement noted.
227	Barbara Zimmer	We need jobs and a bigger tax base in White Pine county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
228	██████████	The Pan Mine means safe, high tech and family wage jobs for 150 full time employees. The proposed action by Midway should be approved, but it seems the BLM's proposed power line route is too long and thus too expensive, harmful to the environment and would consume too many resources. Approve Midway's proposed action and put Americans to work.	POS, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
229	Randy Lee	Thank you. I've attended numerous Nevada Mining Association workshops over the years and enjoyed every one of them. I whole heartedly support your company mining in general.	POS	Statement noted.
230	██████████	Go for it-we need the employment. All environmental testing has been done I see no reason for you not to proceed.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
231	Chris Ricci White, Pine Nutrition Program	I am in total support of Midway's Pan Mine Project. I for personal reasons-have a son and his young friends are majoring in mine engineer at Colorado School of Mines. This means jobs for them and of course our local community will benefit. Not only will this project create jobs, but will boost our local economy. Midway Gold has been generous in their support of our community already. With the project in operation their support will only continue.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

Letter/ Comment ID No.	Name/Entity	Comment	Comment Code	Response
232	Patrick Fox	I'm appreciative of what you've done for the community a few years ago I took your bus ride to the state football championship it was the nicest community event I've been to in the 7 years I've lived here. I'm also happy that Barrick Gold is partnering with you in the Spring Valley Project.	POS	Statement noted.
233	Jack Moore	The area needs the jobs and income.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
234	G.R. Schielke	I believe that the project is important to our county because it will provide needed employment and a necessary boost to our economy.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
235	Rosavra Perkins	Yes open as soon as possible, good for the economy job opportunities.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
236	Mary C. Martinez	It is important to be able to generate more jobs for the area also it helps the economy. By allowing Midway Gold open it's Pan Mining. Please reconsider.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
237	██████████	This is good for the economy. There are still many people that do not know or understand what the project is about. What this will do for wildlife plant's the hunting in this area. How all the natural habitat of the wild life will be protected if this project is approved.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
238	██████████	White Pine County needs the work.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
239	Leon Ernest	I believe this would be a big benefit to the White Pine County area. It would benefit the local economy by creating jobs. I don't see any negative impact on the area. I would like to see this project move forward as fast as possible.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
240	Carol Hunt	Good luck!	POS	Statement noted.
241	General Dental Products	We as a business which was moved here for economic development would like to support the Midway Gold EIS draft with alternative 3. The economic impact of this project will be very welcome. We feel the environmental impacts will be small. We support good sound policies with realistic solutions with the environment. The quicker the better for getting this mine in production.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
242	██████████	Go for it.	POS	Statement noted.
243	Glenn Tallman	We need the jobs in (White Pine).	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
244	██████████	I am all for anything that will help bring up our economy by employment and for bringing money into the community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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245	Glenn Clayton	Nevada needs this mine to open for jobs & revenue!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
246	Jeremy Pescio	This mine needs to open for jobs in our local area.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
247	Aaron Martinez	Nevada is mining.	POS	Statement noted.
248	Joey Lerch	Midway Gold is a big supporter in our community with donations being made in our high school and libraries. I think they will be a nice improvement in White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
249	James Kaiser	I am for mining and the revenue it will bring. Oh yeah-don't forget-the JOBS!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
250	Russel Gust, VP Gust Electric	Midway Gold is an important customer of our company. We need the business they give us helps us to maintain our current employee base. The added business this project will bring to the community will significantly impact the local economy in a very positive way. Gust Electric is in total support of the Midway Gold Pan Mine Project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
251	Mike Snodgrass	The Pan Mine Project must move forward. White Pine county needs the revenue and the jobs!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
252	Robert B Miller	Go on the Aultman Street (Ely's Main Street) and count the vacant lots, empty buildings, and "for sale" signs. Ely, Nevada needs all the economic development it can get. The economic impact of the Midway Gold Pan Mine project will have a significant positive effect on Ely, Nevada. There will be other positive effects of the project both statewide and nationally. Equipment and supplies that will be purchased will put people to work in other states of our nation. Once the mine site was selected, there was more human impact by BLM personnel and contractors made necessary by BLM regulations than in the previous 1,000 years and more.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
253	Cayle Crans	Need to move this project forward. This will benefit all people in the county and state and it will benefit habitat during the reclamation phase.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
254	Brent C. Porter	I have worked at several mines that had shutdown. During the operations they were very careful to take care of the land and habitat, do reclamation as they went and after the mines closed. Most mine sites ended up looking better than when they started due to good planning and reclamation. We as miners always leave it in better shape when we leave than we started, it is part in taking care of the environment.	POS	Statement noted.

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255	Cam Reber	Number One-Jobs and revenue, there are plenty of people that need a job. The mine has already been opened before. Midway has already made a positive impact in the local community along with cash flow put into the region.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
256	Randon Garcia	This community relies on mining for jobs. Under the current administration we would be very fortunate to have any job opportunity let alone this many good paying jobs. The impact on sage-grouse while important is one that I am sure Midway will address with diligence and concern. Along those some lines they are in an area that the wildlife can exist and thrive during Midway's operation. Waste disposal is manageable and should be easily managed. I have worked at many of the mining properties and the wildlife adapts quickly and do better in some instances as they are monitored and watched more than other animals on public land.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
257	Nathaniel Klein Hale, Capital Partners	Two comments were sent in. One was handwritten and one was typed. Please refer to comment number 75.	-	Comment noted. No response required.
258	Minnis Alderman	My concern is the protection of the wildlife within our area. More jobs-wonderful! But the wildlife is at the mercy of people; so more information about that protection is of tremendous interest.	WLF	Effects on wildlife are discussed in the EIS, along with mitigative measures.
259		This mining project will provide good jobs and economic development for rural Nevada. I believe the sage-grouse habitat issue has been adequately addressed and the short access road/power line corridor is the logical choice to ensure the safety of the employees. My job is directly related to the minerals industry in Nevada and I want to continue to live and work in Nevada	POS, OPP-SWA	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
260	Terry Vampler, Chief Estimator Ames Construction	I support this project.	POS	Statement noted.
261	Chris Ennes Environmental Manager Ames Construction	I support this project. Specifically the BLM waste rock disposal site design alternative. I do not support the BLM SW power line alternative however.	POS, SUP- WRDA, OPP-SWA	Statement noted.

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262	Wesley Walker, Account Exec Anachemia Mining	I support the Pan Project. The proposed mine will add to Nevada's economic future; White Pine, Eureka as well as other counties in our state. Midway is committed to help sage-grouse habitat and do what is necessary to not impact this birds ecosystem. The BLM included an alternative waste rock disposal site. This is a good idea because it disturbs less land. Regarding land disturbance, the shorter route into the project will disturb much less land than the alternative. I support the shorter route.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17. The effects of the alternative WRDA and power line are evaluated in the EIS.
263	Richard Howe	As a White Pine County Commissioner I believe the Midway Gold Pan Project has gone overboard in compliance with the BLM this county needs the jobs that this project will provide. Each of these studies are costly both in monetary and time. I would hope that the future studies could be monitored while the company is in production. Let's cut the "red tape" and put people to work.	POS	Statement noted.
264	Tim Pruitt, EHS Manager Boart Longyear	As a company it is our pleasure to support projects like the Midway Gold Pan Project. We do this not only from a potential client perspective but more importantly from a strong desire to keep Nevada and our rural communities economically sound. We believe that projects that are studied, planned and executed with purpose not only provide for Nevada families but also improve and keep our environment strong. This particular project is a good example with the relocation of the waste rock site of industry and regulators working together to not just benefit the project but also provide and improve wildlife habitat. With the overall well being of Nevada in mind we strongly support the continuation and approval of the Pan Project in White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
265	Dan Watts, White Pine County SO	As the Sheriff of White Pine County, I'm in full support of this project. We have already seen a positive impact on our community with their presence. In speaking with their management it's been very professional. With the jobs and revenue that will be generated by this project I feel there will be a positive impact on this area. As a sportsman and speaking with other sportsman in White Pine County I don't feel there will be a negative impact on the sage-grouse population within the proposed project area. I am confident if any issues arise Midway will take an aggressive stance and work with all parties involved. In talking with Mr. Gross I believe this is a professional and well run organization, he shows great concerns and pride when it comes to public lands and the community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
266	Jorge De la Cerde, Margarita's Mexican Restaurant	I am in favor of the Pan mine. It will bring economic growth to Ely and more support for small business establishments.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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267	Jennifer Rowley, LaQuinta Inn and Suites Ely	As both a community member and a manager of a local business I hope you give good consideration to this proposal. I have seen Midway Gold take an active role in the community with funding of community events and school activities. It is great to see local businesses giving back to the community and I greatly approve this. As a manager of a local hotel I am also happy to see more business coming through my front door. Midway Gold has been outstanding to work with. Both their local representatives and their corporate visitors have been great! We have seen the increase in business and that is great for the local economy!	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
268	Michael L (Milo) Pearce, Prospector Spectrum Enterprises	Midway Gold's Pan Project is a viable, above board endeavor. The company is investing \$100,000 million in overall capital. I have lived here for 55 years, the fact is mining has been a staple for employment for over 100 years. Midway has shown they are willing to do whatever they can to meet environmental hurdles. Moving the waste dump at a cost of 4 million dollars for the protection of the sage-grouse is only one example. The employment of 311 people for mine construction and operations is a definite plus. The project should be given a complete thumbs up. God Bless America.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
269	Felix Ha owner Twin Wok Restaurant	It's good to have more jobs in White Pine County. I think it's good for the entire county to have more mines come in, so there will be more tax can be collected for the county. Every city and county needs more jobs and business, but what type of business would come to White Pine other than the mines?	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
270	██████████	The Pan Project would be an economic boost to the citizens of this part of the state of Nevada.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
271	Frank Sharp Owner Sharps Home Furn	We welcome Midway Gold. The jobs and revenue that the mine would bring to Ely would help a sluggish economy and give a boost to many businesses.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
272	Donna Sjogren Owner Donna's Bookkeeping & Secretarial	Ely Nevada and surrounding areas are very much in need of the Midway Gold Pan Mine Project to boost the economic growth of our community. Ely has struggled for as long as I have lived here. We need jobs and new people to move to our community. With new jobs, new businesses will come. Everyone will benefit from this project.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
273	Jaren Gilbert	I am writing in support of Midway Gold's pan Mine Project to be located in White Pine County Nevada. As a local resident of Eureka, Nevada, I feel that this project would help and contribute to the local economy and community. It would add growth to the local economy and bring new residents to the area as well as other job opportunities.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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274	Galen Schorsch, Op Mgr Al Park Petroleum	Mining is good for Nevada. It creates jobs in small communities like Ely and Eureka. Midway Gold is a responsible mining company and will take care of the environment in a conscientious way.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
275	Nobero Nakashima	I fully endorse the Midway gold Pan Mine Project. It will be a great help to White Pine, state of Nevada and the future of city of Ely. Midway Gold has already shown to be a good partner to the community, school, and veterans. They will do well with the ecosystem as much as possible.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
276	Cheryl Nakashima	After reading the pros and cons on the project I feel the mine can coexist with BLM. The Midway Gold project will improve Ely and White Pine County's economy. I have noticed Midway has become involved with the local projects for students and veterans.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
277	Kenna Almborg, Broker/Owner Desert Mountain Realty	I am the broker of Desert Mountain Realty and have been selling real estate in White Pine county for nearly 11 years. Our company was established over 30 years ago so we have seen the impact that the mining industry has had on our community. Our local economy relies greatly on mining for employment, community and school support, as well as the stability of our housing market. From both a personal standpoint and a business standpoint, I would love to see the Midway Gold Pan Mine project go forward and believe that it would have a positive effect on the community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
278		Being in a business that thrives off of and will thrive off local economic development, I have noticed and foresee lots of ways that the Midway Gold Pan Mine project would benefit our community. I believe that with modern laws and regulations the way they are this project would have a far more potential to bring socioeconomic benefits that outweigh any potential environmental impact.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
279		There is only so much available land left in these United States upon which to perform agricultural, ranching, and mining all of which are vital to our nation. I am 100 percent for this project going forward. It has not escaped my notice that wildlife habitats may be encroached upon, certain plants may be at risk, for which I offer these ideas: for the wildlife, animals are amazing when they migrate from one area to another. They will bounce back!! As to the plants, native reseeding is common practice. I see very little reason not to allow this project to go forward. Thank you.	POS	Statement noted.
280	Chuck Hutton, GM Sahara Motors	Any additional opportunities that can be brought into the community is a plus. The environmental impact has been shown to be controllable by proper management. I look forward to welcoming this company to White Pine County.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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281	Kent Robertson OD	I am in favor of approving the EIS applications for Midway Gold. They have proven to be a great fit for our community and have donated time and money to improving our community. The practice seen to be in accordance with a favorable impact on the environment and their mining operation would provide good jobs and boost the economy of our area.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
282	██████████	I would like to see this project up and running. Main reason is for the jobs and revenue. I think it is important to continue growth in the Ely area and believe this company would bring both jobs and revenue growth.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
283	Jennifer Rowley	I have to honesty say as a member of the local community I am happy to see a local business that is active in the community. I am a mom first above all and I see this company supporting community events and school projects. It is nice to see some economic growth and more access to local jobs. Where I am a biology-minded person I hope to see the ecosystem protected and guidelines followed. But it really is great to see the local economy prosper.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
284	Jeffrey B Willes, President/ Corporation Jeffrey B Willes, DC PC	It is imperative that as a community we have this project come to fruition. At a time of economic difficulty using natural resources for the benefits of our community is not only right but necessary.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
285	Donnell Doty	Ely has been my home for almost 50 years. We moved here from Salt Lake City when I was in the third grade, my dad had a dream of going into business for himself and this was the place he wanted that to happen in. We were here for a few years and the opportunity presented itself, after his first few months in business Kennecott went on strike-the longest strike they were ever on. We survived along with all the other people in Ely. Ely has had many lean years, but the people of Ely are survivors, this is where they want to be. Ely has the nicest people. I would love for the economy in Ely to stay strong so people have the ability to stay in our little community maybe even encourage a few more to return. Midway does so much for our community they are very involved in so many different areas-especially when it comes to our youth. I look forward to having them and their operation located in Ely.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
286	Lorraine Clark	As a resident of Ely for nearly 45 years and a business owner here for over 20 years, I encourage new business efforts. Employment for our residents and new people is good for all of us. Midway Gold has been very responsible with the land and making provisions to preserve the history of the Lincoln Highway.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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287	[REDACTED]	I am all about jobs and revenue. This state has gone through a four year recession and it's not over yet. There should be some concern about the well being of sage-grouse. I don't think it is as important as food on the table for people who want to support their families. I think we need to worry about humans more than sage-grouse.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
288	Diane Hansen	Midway Gold has had a positive impact on the area with youth and community activities their support of local business has been way above any other organization. We are lucky to have Midway in our county.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
289	Ray S. Hansen	Midway gold has been very active in the county in a very positive way. Midway support of youth and school has been great impact on the county. Midway support of local business has been outstanding.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
290	Brad K Simpson, Realtor Keller Williams Realty	My wife and I have a real estate office in Ely, Nevada. Not only would the mine bring many jobs to the area, the impact on our business would be very substantial, this impact does not just affect us but would also provide a needed boost the housing construction business in Ely. The efforts at wildlife mitigation and waste rock disposal would also benefit the area. This is a well thought out plan with great economic potential for the area. Mining has a huge impact on the continued growth and economic well being of rural Nevada. I don't believe the environmental impact of this project is a problem. Worse for the state is the continued growth of Las Vegas and their water use.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
291	Deepak Mautotra, President Resource Development	I have been involved in over 300 mining projects worldwide and 10 projects have been built in last decade. Any new project provides socio-economic benefits by creating jobs. For every employee working for the company, three people are indirectly employed. This is good for the county, the state and the country especially at this time of high unemployment. I have worked with the Midway Senior management for over two decades like me, they are lovers of outdoor activities. Hence they make sure that the environment disturbance is minimum and proper mitigation methods are employed. Based on the above comments I strongly recommend that the license to proceed with the project be granted as early as possible.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
292	[REDACTED]	I am in support of Midway Gold and the development of their Pan Project. This type of project is important to Nevada and the people of Nevada.	POS	Statement noted.
293	Fred Baca	I think it is a great idea, it will create jobs for Ely and Eureka the people need it to help out business in towns.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
294	Sheri Tolbert, President Beta Sigma Phi	I would like to see this project move forward. I understand all of the risks and benefits and feel benefits far outweigh the risks. It will be a great addition for our community.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.

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295	Alice Romero	I am hoping your mine project keeps on working here in Ely.	POS	Statement noted.
296	Herminio Romero	Let's hope that everything goes good for Midway Gold Pan Mine Project.	POS	Statement noted.
297	Jeff Snyder, Golder Associates	To whom it may concern, I manage and operate an office of engineers scientist and technician that provides services to the mining industry in Northern Nevada our business depends on growth and continue operation of mines in Northern Nevada. I support the Pan project and hope and pray that a Rod is issued that has logical and sensible alternatives. Thank you.	POS	Comment noted. Socioeconomic impacts, including benefits, are analyzed in Sections 3.16, 4.16, and 5.17.
298.1	Duckwater Shoshone Tribe	Dear Mr. Kreidler; Here are some comments from the Duckwater Shoshone Tribe on the above mentioned EIS. 4.8: Greater sage-grouse: In regards to sage-grouse leks, definitely a time should be placed on mining activities. Consider the actual strutting activities of the sage-grouse. There is a very short time frame when the actual strut and the females mated with the mature roosters. When this strutting occurs, an in-depth study should be considered to determine their actual mating time.	SSS	Section 4.8.2.1 of the DEIS, and the Mitigation Plan as Appendix 4B of the DEIS properly cover mining activity/timing restrictions to avoid active sage-grouse leks.
298.2	Duckwater Shoshone Tribe	4.8 Pygmy Rabbit: A thorough field study should determine if there is a population of pygmy rabbits that are actually in the mining project area. If pygmy rabbits are found, every measure should be made to protect this special status species.	SSS	The USFWS and NDOW were consulted in reference to pygmy rabbits being present east and north of the project area and the potential to be present within the project area. Suitable pygmy rabbit habitat was encountered during baseline surveys, although no individuals or their sign were documented (Chapter 3 of the DEIS). The Mitigation Plan (Appendix 4B) of the DEIS outlines applicable mitigation for the pygmy rabbit.
298.3	Duckwater Shoshone Tribe	Environmental Consequences 4.12 Native American Concerns 4.12.1 Indicators: No field trips have been made to the Pan Mine with the Cultural Resources Office, the Pan Mine, and the BLM-Ely District. The field report indicates that there are not any culturally significant sites in the footprint of the mining project. To prevent any cultural sites that may be identified by tribal elders and culturally knowledgeable people, Tribal monitors/Observers should be hired as consultants during the construction phase of the project and also during the time any ground disturbance is happening. With Tribal Monitors/Observers in place, the Pan Mine is insured that unforeseen or un-reported cultural, sacred, or burials unconverted, the inadvertent discoveries can be handled in a culturally appropriate manner and with integrity.	CR	Cultural monitors are not required for the project because of the lack of prehistoric cultural sites and all unanticipated discoveries would be reported and activities would cease within 100 feet until a notice to proceed is issued by the BLM as outlined in the Programmatic Agreement (Appendix 3B), which the Duckwater Tribe is a signatory of.

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298.4	Duckwater Shoshone Tribe	Cumulative Affect 5.10.2 Greater sage-grouse: The EIS states there will be a negative impacts at various levels to the sage-grouse habitat. The greatest impact will be mining development and exploration activities, roads~ and utilities. This statement is correct, however there is no mention of a mitigation measure to minimize the cumulative effects. A mitigation plan has to be in place to minimize the impacts.	SSS	A mitigation plan to minimize impacts to sage-grouse from only the Proposed Action and action alternatives is included in the EIS as Appendix 4B.
298.5	Duckwater Shoshone Tribe	5.10 Pygmy Rabbit Where is the restoration plan for the pygmy rabbits? There is no mention of the pygmy rabbits in this section. As with any special status species-regardless if the habitat is in the area of potential effect or not. A plan for the pygmy rabbit needs to be in place. These are the comments to the Pan Mine Project.	SSS	The impact determination to pygmy rabbits in Chapter 4 has been updated from "negligible" to "negligible to minor" impacts and has been analyzed in Chapter 5 cumulative effects. No individuals or sign were found; however, suitable habitat is available. The mitigation plan (Appendix 4B) of the DEIS outlines applicable mitigation for pygmy rabbits.
299.1	Environmental Protection Agency, Region IX	Subject: Pan Mine Project Draft Environmental Impact Statement, White Pine County, Nevada [CEQ# 20130071] Dear Mr. Kreidler: The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act. We have rated this Draft EIS as EC-2- Environmental Concerns-Insufficient Information (see enclosed "Summary of Rating Definitions and Follow-Up Action"). Our rating is based on our concerns about the quality of the geochemical characterization conducted for this project and the need for additional water quality monitoring at the mine. We recommend that the Final EIS provide additional information, including a detailed adaptive management plan for geochemical characterization, a commitment to monitor waste rock disposal areas for seepage, and more detail on the heap leach evapotranspiration cell and the power transmission line. Our detailed comments are enclosed. We appreciate the opportunity to review this Draft EIS. Per our Memorandum of Understanding with Nevada BLM for mining EISs, we respectfully request a copy of the preliminary Final EIS prior to its publication. If you have questions, please call me at (415) 972-3521 or contact Jeanne Geselbracht at 415-972-3853. Enclosures: EPA's Summary of Rating Definitions and Follow-Up Action, EPA's Detailed Comments	GEN	The general comments in the letter are acknowledged and are repeated in detail in the actual comments that were attached to the letter.

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299.2	Environmental Protection Agency, Region IX	<p>Geochemical Characterization: Before the North Pan Pit is mined, an adaptive management plan for supplemental waste rock characterization will be implemented with a focus on the North Pan Pit waste rock "with low neutralizing potential" (Waste Rock Management Plan, Draft EIS, App. 2A). If future humidity cell test results indicate acid rock drainage and/or significant metal leaching potential in localized zones of the waste rock, the block model will be refined to the extent possible to identify problematic waste rock zones, and potentially acid generating (PAG) material would be selectively handled in the North Waste Rock Disposal Area. EPA supports conducting supplemental geochemical characterization throughout mining operations and using new information to adaptively manage the project. The Pan project, however, does not appear to present a sampling and analysis plan in support of its geochemical characterization program for either the characterization that has been conducted thus far or the characterization that is to be done under the adaptive management plan. Neither the Waste Rock Management Plan nor the June 2012 Pan Project Final Baseline Geochemistry Report provides the details for sampling and analysis, such as the basis for the samples selected, number of samples, and quantity of material subjected to mineralogical analysis and static and kinetic testing (whole rock analysis, acid base accounting, short-term leach tests and humidity cell tests). Recommendations: The Final EIS and Waste rock Management Plan should include a detailed waste rock sampling and analysis plan for adaptive management. The plan should specify the protocols for selecting representative waste rock samples for testing, the parameters to be analyzed, and criteria for determining whether humidity cell tests have run long enough. The sampling and analysis plan should provide for a statistically representative approach that allows for evaluation based on:</p> <ul style="list-style-type: none"> • Geological and lithological units • Zones of mineralization within the units • Source type (wall rock, waste rock, ore, etc.) • Mining phase <p>The plan should provide the basis for the samples selected, number of samples, and quantity of material tested, for each unit, source, and phase. The plan should also address sample storage and preparation, quality assurance/quality control, and identify and justify the type and number of mineralogical, whole rock, acid-base accounting, and short-term and long-term leach tests to be performed.</p> <p>The following table identifies some references that address these issues and which we recommend be considered for the sampling and analysis plan: PLEASE REFER TO TABLE ON PAGE 2</p> <p>Criteria for determining the duration of individual humidity cell tests should be based on the relative reactivity of, and actual available neutralization potential present in, each sample. These criteria should account for initial reactivity of calcium and magnesium carbonate minerals and allow for their complete dissolution in the presence of acid generation potential before discontinuing tests. We recommend that tests continue until the rates of</p>	PA	<p>Midway has prepared an updated Waste Rock Management Plan (Appendix 2A) that will include the information recommended by EPA for ongoing waste rock characterization for adaptive management. Additional information would be developed during the first 4 to 6 years of mining including advancement of the mine plan, block model and geologic model and as part of the operational waste rock monitoring. These data would be instrumental in doing the final design of the final supplemental waste rock characterization for the North Pit unconfirmed PAG material. While BLM agrees with EPA that such a detailed plan is helpful, this level of detail is not considered necessary for the BLM to make a reasoned choice between the action alternatives.</p> <p>The 1.5 percent sulfur value was not used as a cut-off value for any testing and no samples were excluded from any testing based on this value. The 1.5 percent sulfur value was an observation based on data interpretation only. The non-PAG determination was gleaned from all available data, weighting the (more rigorous) kinetic (e.g., HCT) test results more heavily than static test results. It is also not our intention to use the sulfur data in isolation for any screening during the supplemental waste rock characterization.</p>

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		<p>sulfate generation and metal leaching have stabilized at relatively constant rates for at least several weeks and until either acid effluent is produced or all calcium and magnesium carbonate minerals have been depleted. According to the June 2012 Pan Project Final Baseline Geochemistry Report (p. 29), the majority of unconfirmed PAG waste rock samples have "low total sulfur (less than 1.5 percent)" and "are generally relatively inert" because they have low acid potential (AP) and low neutralizing potential (NP). It appears that these assumptions may have led to an erroneous discounting of samples with less than 1.5 percent sulfur content. According to the MEND Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials, the Global Acid Rock Drainage (GARD) Guide, and other sources, a percent sulfur cut-off grade should not be used as the only means of addressing acid generation potential to limit kinetic testing of PAG samples. Even low levels of sulfide can lead to acid drainage if neutralization potential is less than acid generating potential. Recommendation: We recommend that samples be considered for testing if their NP:AP ratio is less than 3:1, and that 1.5 percent sulfide not be used as a cut-off to determine "low neutralizing potential."</p>		
299.3	Environmental Protection Agency, Region IX	<p>Water Quality Monitoring The Draft EIS includes the Groundwater Monitoring Plan and the Stormwater Management Plan, which describe water quality monitoring of wells, and inspection schedules and best management practices for stormwater controls, respectively. Neither these plans nor the Waste Rock Management Plan, however, address monitoring and reporting of surface or subsurface discharges from the waste rock disposal areas, should they occur. Recommendation: The Pan Project Waste Rock Management Plan should be revised in the Final EIS to include a monitoring and reporting section to address potential seepage. We recommend that the waste rock disposal areas be thoroughly inspected for seepage between seven and 14 days after 25-year, 24-hour storm events, as well as during and after spring runoff, to look for non-stormwater seeps. Any detected seepage should be sampled and analyzed for Profile I parameters. The plan should describe the actions that would be taken to prevent pollutant migration and wildlife exposures if any pollutants are found at concentrations trending toward or exceeding water quality criteria. We recommend that this information also be added to Section 6, Non-Stormwater Discharge Management, of the Pan Project Stormwater Management Plan.</p>	WTR	<p>Midway has prepared an updated Waste Rock Management Plan (Appendix 2A) that will include the information recommended by EPA for monitoring and reporting of potential seepage from the waste rock storage facilities. While BLM agrees with EPA that such a detailed plan is helpful, this level of detail is not considered necessary for the BLM to make a reasoned choice between the action alternatives. The subject additions to the updated Waste Rock Management Plan will also be added to Section 6, Non-Stormwater Discharge Management of the Pan Stormwater Management Plan as a compliance stipulation in the Record of Decision. Midway will revise the Waste Rock Management Plan and Stormwater Management Plan to include a monitoring and reporting protocol. The WRDAs would be visually inspected a minimum of once per year immediately after the spring melt/runoff period, and additionally within one to two weeks after storm events equal to or greater than the 25-year, 24-hours event. Any seeps</p>

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				<p>would be identified, coordinates noted, and described in terms of flow rate estimate, and color or unusual character. If the flow rate is sufficient, a water sample would be collected and sent for Profile I analysis. If Nevada reference values are exceeded, a plan would be developed to minimize potential seepage and consequent impacts to groundwater, including but not limited to the following possible actions:</p> <ul style="list-style-type: none"> • elimination of ponding on the dump surface to promote runoff and minimize infiltration and seepage, • creating new and/or deepening existing upstream surface water diversion ditches to better intercept shallow groundwater flux and reduce seepage, • concurrent reclamation of the source area to maximize in-situ (i.e., on dump) surface losses via runoff and/or vegetation transpiration, • collection and pumping of seepage water into the mill circuit for make-up water use during operations, and • longer term closure management via evaporation from an evaporation or evapotranspiration cell.

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299.4	Environmental Protection Agency, Region IX	<p>The Draft EIS provides no information regarding the fate and transport of cyanide, metals, and the other constituents in the leached ore and evapotranspiration (ET) cell over the course of closure and post-closure. The document states that operational monitoring data for drain down flows and chemistry would be used to confirm modeled flows, and submitted as part of the Final Plan for Permanent Closure at least two years prior to closure of the heap leach facility. We agree that operational monitoring should be used to inform and update the closure and post-closure plans as the project approaches its closure phase; however, information on the projected drain down flows and chemistry of the heap leach facilities and ET cell is needed at the planning stage and should be disclosed in the EIS. This information is necessary to inform and support the Record of Decision (ROD) with respect to the mine design and anticipated closure and post-closure needs, including appropriate financial assurance. Recommendation: The Final EIS should provide the projected drain down chemistry and flow timelines for the heap leach facility and ET cell.</p>	HAZ	<p>The information recommended by EPA on the projected draindown flows and chemistry of the heap leach and ET cell has been added to the EIS. That information consists of the following narrative:</p> <p>Initial leach pad effluent chemistry at the cessation of active leaching operations would be similar to operational chemistry. Metallurgical column testing indicates concentrations of: aluminum (1.4 – 24.3 mg/L), arsenic (0.1 – 1.9 mg/L), cadmium (<0.1 - 0.1 mg/L), copper (<0.1 – 1.9 mg/L), iron (0.3 – 3.3 mg/L), and lead (<0.1 – 0.1 mg/L) would be greater than State of Nevada Form 0190 Reference Standards for these solutes. All other metals are expected to be less than the reference standards. In addition, WAD cyanide would significantly exceed the reference standard of 0.2 mg/L during operations, and pH would be maintained a higher value than 8.5 standard units to facilitate beneficiation operations. TDS is expected to be elevated above the reference value of 1,000 mg/l depending on ore type with major contributors to TDS being sodium and bicarbonates (or carbonates).</p> <p>With regard to leach pad effluent chemistry following closure stabilization actions, additional data specific to ore samples are provided in Table 6 of the Interrallogic, 2012 report titled Final Baseline Geochemistry Report: Pan Project, Nevada, prepared for Midway Gold US Inc., and dated June 2012. These data include 16 MWMP results which indicate that arsenic and thallium would tend to be leached by meteoric water at concentrations that exceed NDEP reference values. This report will be part of the Midway Pan Mine Plan of Operations and Reclamation Permit Application update when finalized. When sodium cyanide addition to heap leach process solution is curtailed, recirculation of process solution will be performed resulting in</p>

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				<p>the following potential changes to solution chemistry passing through the heap:</p> <ul style="list-style-type: none"> • Reduction in WAD cyanide to single figures and perhaps less than unity, but still above the reference standard of 0.2 mg/L; • Increase in nitrate to above the reference standard of 10 mg/L (possibly to hundreds of mg/L); and • Nominal increases in TDS and some metals concentrations because of the effects of evaporation. TDS is expected to be greater than 1,000 mg/L. <p>Following cover placement, the chemistry of leach pad effluent is anticipated to contain constituent concentrations of nitrate, WAD cyanide, TDS, aluminum, arsenic, cadmium, copper and lead that are elevated above State of Nevada reference standards. WAD cyanide in post-closure effluent flows is anticipated to reduce to below the NDEP reference standard of 0.2 mg/L in the longer post-closure term, based on empirical data from other Nevada gold oxide-ore leach pads, and nitrate concentrations may increase as a result. At no stage is pH expected to decrease below six standard units or increase to above nine standard units. Modeled flows include the HLDE Model to determine the short-term flow rates requiring initial evaporation in the ET Cell (i.e., before closure cover placement), as well as a post-closure infiltration model to determine flow rates requiring evaporation in the ET Cell. The HLDE Model for heap leach closure draindown flows immediately following leaching operations is provided in Appendix M.1 – Standardized Reclamation Cost Estimator Version 1.1.2 (SRCE) in the Pan Mines Plan of Operations Reclamation Permit Application, May 2012 revision. The model results show that following cessation of operational leaching the drain down flow rate reduces from 5,000 gpm to around 10 gpm within 12 months and further reduces to a consistent flow rate of around 2 gpm within a</p>

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				<p>few months thereafter. This is the initial minimum design flow rate for the ET Cell, theoretically requiring one to two acres of post-closure evaporation area to manage (refer to NDEP Guidelines for Closure; and HLDE Model guidelines). A single process water pond (area of about 7.6 acres) is therefore sufficient to manage the effluent flow prior to cover construction.</p> <p>After cessation of leaching, process solutions would be recirculated from the process ponds to the heap and actively evaporated on the heap until draindown flows can be managed via evaporation in the Pregnant Solution Pond. No fresh water rinsing of spent ore is anticipated during heap closure.</p> <p>Infiltration modeling performed by Dwyer Engineering (presented in the report titled Modeling Report in Support of a Soil Cover Design, dated January 2012 and contained in Appendix F in the Pan Mines Plan of Operations Reclamation Permit Application, May 2012 revision), predicts that a 2.5-foot soil cover will experience zero flux of water under average precipitation conditions and low flux conditions for the wettest year on record, and concludes that significant percolation is not anticipated if the final cover is composed of 2.5 feet of sandy, loam, sandy clay loam or loamy sand. Therefore the single pond area ET Cell appears fully adequate for both containment and disposal via evaporation of post-closure HLP flows.</p> <p>Financial assurance for closure and reclamation of the HLP, modification of a single process water pond and closure of a second process water pond is provided in Appendix M.1 in the Pan Mine Plan of Operations Reclamation Permit Application, May 2012 revision.</p>

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299.5	Environmental Protection Agency, Region IX	According to the Draft EIS (p. ES-5), the spent leach material on the heap leach pad would be rinsed with water to reduce reagent and dissolved metals concentrations in the heap leach pad drainage to the solution ponds. The Draft EIS (p. 2-68) and the May 2012 Plan of Operations (p. 3-9), however, state that the spent heap would be allowed to drain with no fresh water rinsing. Based on personal communication (May 1, 2013 email from Miles Kreidler to Jeanne Geselbracht), we understand the latter to be the case. Recommendation: The Final EIS should clarify that no fresh water rinsing of the spent ore is anticipated during closure.	WTR	After cessation of leaching, process solutions would be recirculated from the process ponds to the heap and actively evaporated on the heap until draindown flows can be managed via evaporation in the pregnant solution pond. No fresh water rinsing of spent ore is anticipated during heap closure. The necessary correction was made to the Executive Summary in the EIS.
299.6	Environmental Protection Agency, Region IX	Connected Actions According to the Draft EIS (p. 2-10), a new 69 kV power transmission line will be constructed as part of the proposed action. While part of the transmission line is evaluated as a connected action in the Draft EIS, the segment of the line that would run north of Highway 50 is evaluated in a separate Environmental Assessment rather than in this EIS. It is unclear from the Draft EIS whether the segment planned for north of Highway 50 would have independent utility. For example, if the Pan Mine were not permitted, would the transmission line segment north of Highway 50 still be constructed? Other than transmitting power to the Pan Mine, what are the purpose and need for the new transmission line? Recommendation: If the northern segment of the transmission line does not have independent utility, the entire proposed new transmission line should be evaluated as a connected action in the Pan Project Final EIS.	PA	Mt. Wheeler Power has made it clear that the proposed 69 kV power line located north of Highway 50 is necessary to establish power at this location for not only the Proposed Action transmission line for the Pan Project but also for the proposed transmission line from this point to the proposed American Vanadium, Gibellini Mine Project located southwest across the valley from the Pan Mine. Additionally, if the power line to American Vanadium is constructed, Mt. Wheeler Power has indicated interest by the Duckwater Shoshone Tribe to extend a new power line south to Duckwater, Nevada. Based on the above information, BLM determined that the power line north of Highway 50 has independent utility and is therefore not a connected action for the Pan EIS.