

Appendix 4B Mitigation Plan

MITIGATION PLAN PAN MINE PROJECT

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LIST OF ACRONYMS & ABBREVIATIONS

ATV	All-Terrain Vehicle
BBCS	Bird and Bat Conservation Strategy
BLM	Bureau of Land Management
FEIS	Final Environmental Impact Statement
EPM	Environmental Protection Measure
Midway	Midway Gold U.S. Inc.
NDOW	Nevada Department of Wildlife
NRHP	National Register of Historic Places
PGH	Preliminary General Habitat
PPH	Preliminary Priority Habitat
SHPO	State Historic Preservation Office
USFWS	United States Fish and Wildlife Service

MITIGATION PLAN PAN MINE PROJECT

1.0 INTRODUCTION

This Mitigation Plan includes mitigation by resource as described in the Final Environmental Impact Statement (FEIS) prepared for the Pan Mine Project plus additional mitigation measures that were determined through consultation between Midway Gold U.S. Inc. (Midway), the Bureau of Land Management (BLM), the Nevada Department of Wildlife (NDOW), and the United States Fish and Wildlife Service (USFWS). Specific impacts to the affected resources are described in Chapter 4 of the FEIS.

The mitigation measures specified in this Mitigation Plan are designed to reduce impacts to the resources, which may occur from the Proposed Action. The BLM approach to mitigation is to first avoid and then minimize the impacts on public lands from proposed activities. Minimization is achieved through design features, best management practices, and Environmental Protection Measures (EPMs), which are part of the project, and which are detailed in Chapter 2 of the FEIS. However, not all impacts associated with the Proposed Action can be eliminated by these measures. For those impacts that cannot be avoided or minimized, the implementation of measures to mitigate the impacts needs to be developed with the goal of ensuring the viability of the impacted resources over time. In some cases, off-site mitigation may be required to compensate resource impacts by replacing or providing substitute resources or habitat at a different location than the project area. This on-site and off-site mitigation is used to increase the BLM's ability to fulfill its resource management objectives.

Resources where it was determined that the implementation of the Proposed Action would have a significant impact are included in the mitigation plan. If impacts were avoided through project design or EPMs or no mitigation was recommended by the EIS, mitigation is not discussed in this document. Resources addressed in this document include vegetation including noxious and non native, invasive weeds and special status plants; wildlife resources including special status wildlife and migratory birds; greater sage-grouse; wild horses; cultural resources; land use and access; and visual resources.

2.0 VEGETATION, INCLUDING NOXIOUS AND NON-NATIVE, INVASIVE WEEDS AND SPECIAL STATUS PLANTS

The following mitigation measures for vegetation, and sensitive plant species, have been proposed in the EIS.

2.1 MITIGATION

Mitigation Measure Veg-1: To mitigate for the potential loss of individual sand cholla plants and its habitat as a result of disturbance from the Proposed Action, Midway would provide monitoring during construction, maintenance, and reclamation activities to minimize impacts to plants and their habitat. Previously identified individual plants and populations would be flagged and avoided, if possible, while constructing access roads and installing power poles. If it is determined that individual plants are unavoidable, the locations of these plants would be reported. In coordination with the BLM, Midway would develop a plan to salvage and transplant these plants, for which a survival rate of 80 percent must be achieved.

Mitigation Measure Veg-2: Midway would implement an employee-training program to educate employees of the importance of not disturbing flagged areas. This training would be conducted when the employee is initially hired and as part of periodic site safety training. Training would also be conducted prior to starting construction activities on the main access road and power line areas where sand cholla plants have been identified. The employee training program would educate workers on the locations of the sand cholla populations within the project area and on how to avoid impacts to those species.

Mitigation Measure Veg-3: During reclamation, a BLM approved native seed mix would be used within sand cholla habitat. A reference area would be established within sand cholla habitat and used as the target for reclamation. The frequency, density, and ground cover of the native vegetation would be documented for sand cholla habitat.

2.2 COMPLETION SCHEDULE

Mitigation Measure Veg-1: This mitigation measure would be implemented prior to construction, during construction, and during reclamation activities.

Mitigation Measure Veg-2: This mitigation measure would be implemented starting at construction and throughout the life of the mine and reclamation activities.

Mitigation Measure Veg-3: Reference areas would be established at the beginning of reclamation. Seeding similar to that of what exists in the surrounding area will take place during reclamation activities.

2.3 DETERMINATION OF EFFECTIVENESS OF PROPOSED MITIGATION

Implementation and effectiveness monitoring would occur in areas previously identified as sand cholla habitat and a monitoring report would be sent to the BLM Ely District Office upon completion of construction activities and following each monitoring event. A qualified biologist would be present during construction and reclamation activities to minimize impacts to sagebrush cholla plants and to document implementation and effectiveness monitoring.

Implementation monitoring would include documentation on whether the known locations of sand cholla were flagged and avoided during power pole placement and power line and access road construction. It would also document employee training, construction monitoring results, and reclamation results.

Effectiveness monitoring would include documenting where implementation and monitoring occurred and if new occurrences of sand cholla were observed within the project area. When evaluating the persistence of the current population of sand cholla, the baseline data from the 2011 and 2012 surveys would be used. These populations would be re-surveyed once every two years following construction and once every three years following reclamation.

2.4 RESIDUAL IMPACTS FROM MITIGATION

No negative impacts are expected from the implementation of this mitigation.

3.0 WILDLIFE RESOURCES, INCLUDING SPECIAL STATUS WILDLIFE, AND MIGRATORY BIRDS

3.1 MITIGATION

3.1.1 Greater Sage-Grouse

The conservation measures presented in this section are intended to mitigate impacts to greater sage-grouse (*Centrocercus urophasianus*) resulting from the Pan Mine Project. Greater sage-grouse population decline has recently been identified as a concern by numerous federal and state agencies in the United States. The USFWS detailed reasons for the declining populations in the following Federal Register publication: “Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to List the Greater Sage-Grouse as Threatened or Endangered”. In March 2010, the USFWS published its decision on the petition to list the greater sage-grouse as "Warranted but Precluded" 75 Fed. Reg. 13910, (March 23, 2010). Over 50 percent of the greater sage-grouse habitat is located on BLM-managed lands. In its "Warranted but Precluded" listing decision, the USFWS concluded that existing regulatory mechanisms, defined as "specific direction regarding greater sage-grouse habitat, conservation, or management in the BLM's Land Use Plans were inadequate to protect the species. The USFWS is scheduled to make a new listing decision in fiscal year 2015 (BLM, 2011). Greater sage-grouse use a variety of habitats in and around the project area. The goal of the mitigation is to avoid impacts to greater sage-grouse habitat where possible and, where avoidance is not possible, reduce impacts to an acceptable level. Where impacts are unavoidable or cannot be reduced through mitigation off-site mitigation is provided. This work would be completed in cooperation with applicable state and federal agencies and other private stakeholders.

The on-site mitigation provided below has been developed in response to impacts to greater sage-grouse from raptors perching on power lines near leks that facilitate predation and from noise and human activity that can cause mortality. During spring of 2013, ambient noise levels were measured at the lek sites. The modeled results exceed the impact threshold of 10 dB(A) at the Southwest Pancake lek from construction activities, and at the East Blackpoint lek from mining activities.

The off-site mitigation provided below has been developed in response to permanent disturbance to greater sage-grouse Preliminary Priority Habitat (PPH) and Preliminary Greater Habitat (PGH).

On-Site Mitigation

Mitigation Measure W-1: Modified transmission line structures, including line strike diverters and perch deterrents would be used for proposed transmission lines constructed within 3.2 miles of greater sage-grouse leks of unknown and active status and within PPH and PGH designated

habitats. All modifications to the transmission lines, including line strike diverters, and perch deterrents will be approved by BLM, NDOW, and or the USFWS prior to installation.

Mitigation Measure W-2: No construction or new ground disturbance would occur during the period from March 1 through May 15 from one hour before sunrise until three hours after sunrise within two miles of active greater sage-grouse leks.

During spring of 2013, ambient noise levels were measured at the lek sites. The modeled results exceed the impact threshold of 10 dB(A) at the Southwest Pancake lek from construction activities, and at the East Blackpoint lek from mining activities. Midway would limit noise at leks to less than 10 decibels above ambient from March 1 through May 15 from one hour before sunrise until three hours after sunrise. Midway would submit a plan subject to BLM approval that specifies the steps Midway would take to ensure that noise levels would remain below 10 decibels greater than ambient. Midway would conduct noise monitoring between March 1 and May 15 of each year to ensure that noise levels are achieved. If monitoring shows that noise thresholds are exceeded, Midway would employ mitigation measures as outlined in the BLM-approved plan. Suggested mitigation measures include:

- Restrict activities from March 1 through May 15 from one hour before sunrise until three hours after;
- Reduce vehicle speed limits on the access road during the period from March 1 through May 15;
- Restrict the use of engine brakes; and
- Other appropriate mitigation measures that reduce noise levels at leks.

Off-Site Mitigation

An off-site mitigation plan would be developed and approved by the BLM, of which the key components would include:

- Complete off-site mitigation of impacted PPH on a three to one basis, meaning that for every one acre that is impacted by the project within PPH, Midway would restore or enhance three acres of habitat either adjacent to the project, within the Population Management Unit, or within adjacent PPH habitats (Table 3.1).
- Complete off-site mitigation of impacted PGH on a two to one basis (Table 3.1).

Table 3.1 Impacted Habitat Requiring Off-Site Mitigation

	PPH Disturbance (acres)	PGH Disturbance (acres)
Proposed Action*	2,652	1,704
Waste Rock Disposal Site Design Alternative**	2,652	1,733
Southwest Power Line Alternative***	468	1,302

*Since sage-grouse perceive danger from tall structures, such as power lines, an additional zone of influence of 600 meters on either side of the power line would be affected.

**There would be an increase of 29 acres of impacted PGH during operation compared to the proposed action because the fence line within the project area shifts slightly to the east to accommodate the WRDA footprints for the Waste Rock Disposal Area Design Alternative (Figure 2.4-1).

***The Southwest Power Line Alternative was developed to avoid impacts to sage-grouse to the greatest extent possible; therefore, off-site mitigation from the effects to the zone of influence from the power line would not be required.

Midway would be given a mitigation offset for the cost of the USGS sage-grouse study for up to 50 percent of its total mitigation obligation from the project.

A Wildlife Working Group would be established and would consist of members from the BLM, NDOW, and Midway to determine specific off-site mitigation steps, ensure compliance, and monitor progress.

3.1.2 Pygmy Rabbits

Mitigation Measure W-8: Pre-construction clearance surveys for pygmy rabbits would occur prior to any surface disturbance. Pygmy rabbits are known to be active above ground throughout the year, so these surveys would be required regardless of the season. If occupied pygmy rabbit habitat is identified during pre-construction clearance surveys and natal burrows are found, new disturbance would not occur within 200 feet of those areas. If disturbance of these areas is determined to be unavoidable, consultation with the appropriate BLM and NDOW wildlife biologists would occur to develop mitigation techniques.

3.1.3 Raptors

Mitigation Measure W-9: Midway would fully implement and adhere to the construction techniques, design standards, and avian mortality reporting set forth in the Pan Bird and Bat Conservation Strategy (BBCS) for the Proposed Action for raptors, western burrowing owls, migratory birds, and bats and the Eagle Conservation Plan for golden and bald eagles.

3.1.4 Western Burrowing Owl

Mitigation Measure W-10: Pre-construction clearance surveys for western burrowing owl would occur prior to any surface disturbance occurring from March 15 through August 31. If occupied western burrowing owl nesting territories are encountered, Midway would avoid the area within 0.25 miles of the active territory until a qualified biologist has determined the young have fledged and the nesting territory has been abandoned for the season. If disturbance of these areas

is determined to be unavoidable, consultation with the appropriate BLM and NDOW wildlife biologists would occur to develop mitigation techniques.

3.1.5 Migratory Birds

Mitigation Measure W-11: Midway would fully implement and adhere to the construction techniques, design standards, and avian mortality reporting set forth in the BBCS for the Proposed Action.

Mitigation Measure W-12: Midway would conduct nesting surveys for migratory birds if disturbance needs to occur between April 1 and July 31 within seven days of disturbance. In coordination with the BLM, an avoidance buffer would be determined and the nest would be avoided to prevent destruction or disturbance of nests until the birds are no longer present.

3.1.6 Dark Kangaroo Mouse

Mitigation Measure W-13: During pre-construction trapping for dark kangaroo mice in potentially suitable habitat within the project area, occupied dark kangaroo mouse habitat was identified; however, this habitat is outside of the disturbance area. If disturbance of this area is proposed in the future, consultation with the appropriate BLM and NDOW wildlife biologists would occur to develop avoidance strategies and mitigation techniques.

3.2 COMPLETION SCHEDULE

3.2.1 Sage-Grouse

The Wildlife Working Group would determine where restoration projects would be completed. The USGS sage-grouse study may help determine where and when off-site mitigation would be conducted. The off-site mitigation would be initiated within one year of ground disturbance and completed within 10 years of ground disturbance.

3.2.2 Pygmy Rabbits

This mitigation would take place prior to any surface disturbance.

3.2.3 Raptors

This mitigation would take place as outlined in the BBCS.

3.2.4 Western Burrowing Owl

This mitigation would take place prior to any surface disturbance.

3.2.5 Migratory Birds

This mitigation would take place throughout the project.

3.2.6 Dark Kangaroo Mouse

This mitigation would take place prior to any surface disturbance.

3.3 DETERMINATION OF EFFECTIVENESS OF PROPOSED MITIGATION

3.3.1 Sage-Grouse

The effectiveness of the mitigation would be determined by performing lek counts and population surveys.

3.3.2 Pygmy Rabbits

Effectiveness of mitigation will be determined by the BLM in consultation with NDOW and other consulting parties, as appropriate.

3.3.3 Raptors

Effectiveness of mitigation will be determined by raptor nest usage and location surveys, including Golden Eagles.

3.3.4 Western Burrowing Owl

Effectiveness of mitigation will be determined by the BLM in consultation with NDOW and other consulting parties, as appropriate.

3.3.5 Migratory Birds

Effectiveness of mitigation will be determined by the BLM in consultation with NDOW and other consulting parties, as appropriate.

3.3.6 Dark Kangaroo Mouse

Effectiveness of mitigation will be determined by the BLM in consultation with NDOW and other consulting parties, as appropriate.

3.4 RESIDUAL IMPACTS FROM MITIGATION

3.4.1 Sage-Grouse

The Wildlife Working Group would determine where restoration projects would be completed; therefore, site-specific analysis cannot currently be prepared. NEPA analysis for these restoration projects would be determined by the BLM.

3.4.2 Pygmy Rabbits

No negative impacts are expected from the implementation of this mitigation.

3.4.3 Raptors

No negative impacts are expected from the implementation of this mitigation.

3.4.4 Western Burrowing Owl

No negative impacts are expected from the implementation of this mitigation.

3.4.5 Migratory Birds

No negative impacts are expected from the implementation of this mitigation.

3.4.6 Dark Kangaroo Mouse

Impacts from mitigation include the potential loss of individuals during trapping. This would be kept at a minimum by practicing accepted small mammal trapping techniques.

4.0 WILD HORSES

4.1 MITIGATION

In order to minimize the potential of wild horses accidentally entering the fenced portion of the project area and not being able to be released easily, the following mitigation measure would be employed.

Mitigation Measure H-1: Gates would be installed along the fence line at every corner. If the fence stretches longer than one mile, a gate would be placed at one-mile increments. Gates also need to be placed on either side of cattle guards.

4.2 COMPLETION SCHEDULE

Mitigation Measure H-1: The gates along the mine boundary fence line would be installed during the construction of the fence.

4.3 DETERMINATION OF EFFECTIVENESS OF PROPOSED MITIGATION

Field verification will be conducted by the BLM to ensure that gates are properly installed once the entire fence line is constructed.

4.4 RESIDUAL IMPACTS FROM MITIGATION

No additional impacts are expected from the implementation of this mitigation.

5.0 CULTURAL RESOURCES

5.1 MITIGATION

A mitigation plan for the 1913 to 1922 alternative route of the Lincoln Highway segment has been completed, in coordination with the Eastern Nevada Chapter of the Lincoln Highway Association (Midway, 2012). The road segment would be re-routed along an existing two-track.

Mitigation Measure C-1: Mitigation for the 1913 to 1922 alternative route of the Lincoln Highway and the proposed re-route includes video documentation of its existing condition and route. The purpose of videotaping the 1913 to 1922 alternative route of the Lincoln Highway is to document its characteristics and condition prior to disturbance as a form of data recovery. Lincoln Highway reroute signs directing the public will be placed at the intersection of U.S. Highway 50 and the old Pan Project access road and at the intersection of U.S. Highway 50 and the reroute. Also, an informational kiosk would be installed at the intersection of the Lincoln Highway reroute and the 1913 to 1922 alternative route. The informational kiosk would provide the public with history about the highway and its realignments.

The proposed reroute would utilize an existing two-track road that would interconnect with Highway 50 on the north. This two-track would require minor work to make it passable; two eroded sections of the road would be repaired by smoothing its approach and departure angles slightly to allow a vehicle to safely cross the section. When conducting this repair there are three options: a.) do no earthwork and simply drive the route on an all-terrain vehicle (ATV) to accentuate the route and smooth the two or three ditch crossings; b.) place galvanized, corrugated metal culverts in the either two or three ditch crossings, as necessary, and then cover the culverts with imported material; c.) place smooth steel pipes as culverts in the same manner as the corrugated culverts with the idea that the steel culverts would rust and present a more nostalgic presence as it was indicative of the era of the Lincoln Highway.

If either of the culvert options is chosen, there would be no need for incising the culvert in the erosion channel or disturbing any native ground around the area. The culverts would be covered with imported material to avoid disturbance, providing simple burial and cover of any existing resources. If the option for simply driving the route on an ATV to accentuate the route and smooth the crossings is chosen, the road may need to have the repair repeated periodically to maintain the travel way. Although any of these options would work, for safety, historical accuracy and reduced maintenance, the steel culvert option is preferable.

Mitigation Measure C-2: Adverse impacts to National Register of Historic Places (NRHP)-eligible cultural resources would be mitigated as directed by the Programmatic Agreement.

5.2 COMPLETION SCHEDULE

Mitigation Measure C-1: Prior to any project-related disturbance, Midway would conduct video documentation of the 1913 to 1922 alternative route of the Lincoln Highway and the reroute within the project area. This would be submitted to and approved by BLM in consultation with the Lincoln Highway Association. Once the documentation was approved and BLM has provided a notice to proceed, rerouting of the Lincoln Highway segment and installation of signs and the kiosk would occur.

Mitigation Measure C-2: This mitigation measure would take place throughout construction, the life of the mine, and reclamation.

5.3 DETERMINATION OF EFFECTIVENESS OF PROPOSED MITIGATION

Effectiveness of mitigation will be determined by the BLM in consultation with the State Historic Preservation Office (SHPO) and other consulting parties, as appropriate. Rerouting of the original Lincoln Highway route segment will be documented with video and field verification. Effective mitigation for NRHP-eligible cultural resources will be achieved through completion and approval by BLM and SHPO of a site-specific Treatment Plan, as directed by the Programmatic Agreement, and acceptance of the results of that Treatment Plan. Monitoring of sites and associated reporting will aid in determining the effectiveness of the implemented measures.

5.4 RESIDUAL IMPACTS FROM MITIGATION

Residual impacts to wildlife, mainly greater sage-grouse leks and soils from the Lincoln Highway reroute, would be negligible and long-term as traffic would be limited to mostly dispersed recreational use. Any soil erosion potential from construction of the culvert would be minimal.

Mitigation of impacts through data recovery (i.e., excavation) would constitute an irreversible commitment of that resource. Information and data retrieved through mitigation measures such as data recovery would represent the only research opportunity because data recovery destroys a site.

6.0 LAND USE AND ACCESS

6.1 MITIGATION

Mitigation Measure L-1: In order to minimize unnecessary traffic on the access road, the mine access road would be signed to inform the public that it is a dead end road and for mine access only.

6.2 COMPLETION SCHEDULE

Mitigation Measure L-1: The mine access road would be signed to inform the public that it is a dead end road and for mine access only at the completion of constructing the mine access road.

6.3 DETERMINATION OF EFFECTIVENESS OF PROPOSED MITIGATION

Field verification will be conducted by the BLM to ensure that the access road is properly signed at the completion of constructing the mine access road.

6.4 RESIDUAL IMPACTS FROM MITIGATION

No additional impacts are expected from the implementation of this mitigation.

7.0 VISUAL RESOURCES

7.1 MITIGATION

Mitigation Measure V-1: The exterior surfaces of any ancillary facilities visible from any project Key Observation Points (KOP) or Highway 50 would be painted with non-reflective *shale green* if located in pinyon-juniper vegetation or *shadow gray* if located in shrublands or other open areas. Other non-reflective colors of paint, as determined by the BLM, may be used in place of *shale green* or *shadow gray*.

7.2 COMPLETION SCHEDULE

Mitigation Measure V-1: Implementation of this mitigation measure would take place during construction of project facilities.

7.3 DETERMINATION OF EFFECTIVENESS OF PROPOSED MITIGATION

Field verification will be conducted to ensure that ancillary facilities are minimally visible from all project KOPs and Highway 50, that non-reflective paint is used, and that facility colors blend with the surrounding landscape.

7.4 RESIDUAL IMPACTS FROM MITIGATION

No visual mitigation impacts are expected.

8.0 REFERENCES

Bureau of Land Management (BLM). 2011. BLM National Greater Sage-Grouse Land Use Planning Strategy. Instruction Memorandum No. 2012-044. December 27, 2011.

Midway Gold U.S. Inc. (Midway). 2012. Lincoln Highway Mitigation Plan – Midway Gold Pan Mine, dated December 5, 2012. [Drafted by Midway and approved by the BLM and SHPO]. Ely, NV: Midway.