



APR 30 2014
NEVADA STATE OFFICE
RENO, NEVADA

April 9, 2014

Whitney Wirthlin, Project Manager

Bureau of Land Management

1640 Financial Blvd.

Reno, NV 89502

PUBLIC COMMENTS PERTAINING TO THE DRAFT EIS FOR LONG CANYON MINE PROJECT

Dear Whitney:

Please see below the comments provided by the City of Wells, Nevada:

21.1

1. The City of Wells has participated as a cooperating agency during the construction of this draft EIS and supports the project, however, as stated in the preparation process we still feel there needs to be more than one power alternative listed for the natural gas line placement. While we understand that this line will not be constructed immediately and that Wells Rural Electric Coop and Newmont Mining have had conversations about short term power supply, we feel the alternative to place the natural gas line from Montello into Long Canyon does not meet the goal of mining sustainability for the public. The location of natural gas at the City of Wells heavy industrial park could provide the needed infrastructure to entice anchor industries for which sustainability of the community could be achieved after mine closure. Furthermore, with natural gas into Wells and a co-generation plant in Wells, Long Canyon could still receive its required power needs and benefit the public of Wells with a secondary local source for electricity. This would eliminate the need for a "grid" which would be required with on-site power generation. These issues—secondary electricity and sustainability through diversification, the need for a grid, are not being weighted heavily enough by the BLM. The public benefit greatly outweighs the acres affected in alternative 1 versus 2. The proposed

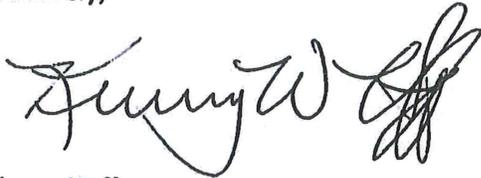
TEL 775.752.3355 FAX 775.752.3419 wellscityhall@frontier.com

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21.1
(continued)

action (2.2.9) does not discuss alternative possibilities that may be more feasible when future/greater power supplies are needed. We strongly recommend the number one alternative is reconsidered as an alternative for planning purposes to include a pipeline route from the Ruby Pipeline south along State Route US93 to Wells. The existing Ruby Pipeline Project previously installed a gate valve for future lateral attachment near the US 93 location. The future needs of all the public should be evaluated beyond just the acres affected before this power alternative is approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenny Huff", with a stylized flourish at the end.

Kenny Huff

Mayor of Wells, Nevada

From: wwirthli@blm.gov on behalf of [ELDOLongCanyonMine, BLM_NV](#)
To: [Kristi Schaff](#)
Subject: Fwd: Long Canyon Mine DEIS Comments
Date: Thursday, May 01, 2014 3:01:21 PM
Attachments: LC DEIS WREC comments42914MC.docx

----- Forwarded message -----

From: **Hank James** <hjames@wrec.coop>
Date: Thu, May 1, 2014 at 11:39 AM
Subject: Long Canyon Mine DEIS Comments
To: "BLM_NV_ELDOLongCanyonMine@blm.gov"
<BLM_NV_ELDOLongCanyonMine@blm.gov>

Attention: Whitney Wirthin

On behalf of Wells Rural Electric Company, I wish to thank you for the opportunity to provide the attached comments regarding the Long Canyon Mine Project Draft Environmental Impact Statement (DEIS).

My contact information is below in the event you should have the need for additional related information or concern.

Again, thank you for your serious consideration of our comments.

Best regards,

On behalf of:

Clay Fitch

Chief Executive Officer

By:

Hank James

Manager, Corporate Services

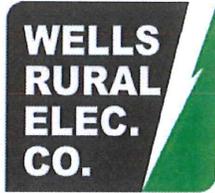
P.O. Box 365

Wells, Nevada 89835

Phone: (775) 752-1555

Cell: (775) 275-0439

<http://www.wrec.coop>



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April 29, 2014

WELLS RURAL ELECTRIC COMPANY

Long Canyon Mine Draft Environmental Impact Statement Comments

BLM Nevada State Office

Attention: *WHITNEY WIRTHLIN*
1640 FINANCIAL BLVD
RENO NEVADA 898502

CONTACT INFORMATION:

JOHN HENNING, SYSTEM ENGINEER
P.O. BOX 365
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[*jhenning@wrec.coop*](mailto:jhenning@wrec.coop)
WWW.WREC.COOP

1.0 INTRODUCTION

There are two major comments which are addressed in this document: the inadequacy of the Power Supply Screening Study; and the inaccuracies pertaining to construction of a transmission line.

2.0 INADEQUATE POWER SUPPLY SCREENING STUDY

- The Power Supply Screening Study is grossly inadequate for routing and siting a new power supply line and riddled with editing mistakes that indicate the document was hastily completed and did not receive the proper attention.

One part of the Proposed Action included in the DEIS is the routing and construction of a new power supply pipeline from the Ruby Pipeline to the proposed Long Canyon Mine complex. Gas turbine generators will be installed at the Long Canyon Mine complex to provide enough power for all mining activities. The route for the power supply pipeline is analyzed with four other alternatives in the project-associated Power Supply Screening Study and the Proposed Action is identified. WREC feels that the Power Supply Screening Study is grossly inadequate for routing and siting a new power supply line.

The five alternatives analyzed include three alternative routes for a gas pipeline from the Ruby Pipeline to the Long Canyon Mine Complex; one gas pipeline from the Ruby Pipeline to Wells, Nevada with a new transmission line from Wells to the Long Canyon Mine complex; and one transmission line re-build from Jackpot, Nevada to the Long Canyon Mine complex. The Power Supply Screening Study does not represent the typical alternatives analysis for new transmission or pipeline routing. For example, the Ruby Pipeline Final Environmental Impact Statement is a major document comprising hundreds of pages of analysis for a multitude of topics. If the power supply for the Long Canyon Mine were its own individual project, the analysis would likely require an Environmental Impact Statement. However, in this instance the Power Supply Screening Study is completed in 15 pages and only considers wildlife, botanical, visual, and water resources. It should be noted that construction of the Proposed Action power supply pipeline will have similar construction impacts to those of the Ruby Pipeline.

The Power Supply Screening Study is not attached to the DEIS as an appendix to be readily available to the public for review. The reader should have the opportunity to comment on how all aspects of the Proposed Action was formed, including how the power supply was chosen. Instead, the reader must recognize that another small analysis was completed by identifying the proper citation in the footnote of Table 2.5-1, then requesting the Power Supply Screening Study from the BLM. The Power Supply Screening Study is an important document which should be made readily available to the public as an appendix to the DEIS.

To reiterate a major concern we have with the results of the LC-DEIS, if the power supply for Long Canyon Mine were its own individual project, the analysis would likely require a more comprehensive and definitive Environmental Impact Statement. This would necessitate additional public scoping meetings to allow the public to comment on the potential power supply options and the routes each might follow. After reviewing the Long Canyon Scoping Document provided with the DEIS, it is unclear if the public was provided adequate information to provide informed comments regarding the power supply options.

The Power Supply Screening Study and power supply section of the DEIS (Section 2.5.6) contain several errors throughout the document. Incorrect table references, figures with incorrect legends, incomplete sentences, and grammatical errors occur throughout:

- Power Screening Supply Study Section 1.2.2 sites Table 1 for details regarding data considered in the Power Supply Screening Study. Table 2 provides that information, not Table 1;
- Grammatical error in Section 1.3.1 reads "...some resources were eliminated from further analysis because they very unlikely to cause...";

22.5
(continued)

- Power Screening Supply Study Section 1.3.1 identifies the need for a 3-mile buffer surrounding greater sage-grouse leks, but provides no citation as to why a 3-mile buffer is applied;
- Power Screening Supply Study Section 1.3.1 states that the West Wide Energy Corridor and designated BLM ROW Corridors are included in the analysis but these two corridors are not mentioned again;
- Power Screening Supply Study Figure 1 does not provide a correct figure legend to identify each aspect of the map;
- Power Screening Supply Study Figure 2 legend indicates Alternative 2 is shown on the map when it is not;
- Power Screening Supply Study Figure 3 legend indicates Alternative 3 is shown on the map when it is not;
- Power Screening Supply Study Figure 4 legend indicates Alternative 4 is shown on the map when it is not;
- Power Screening Supply Study Figure 5 legend indicates Alternative 5 is shown on the map when it is not.
- DEIS Section 2.5.6 states that Economic Viability was considered for each potential power supply alternative. Economic Viability is not addressed in the Power Supply Screening Study.
- DEIS Section 2.5.6 states that Alternative 3 was selected as the Proposed Action due to the least environmental impacts and being the least expensive to construct. However, Table 2.5-1 indicates Alternative 4 has the least environmental impacts and is the shortest.

These mistakes indicate that the Power Supply Screening Study, a document responsible for routing over 30 miles of new natural gas pipeline or 100 miles of transmission line re-build, was not reviewed to an adequate level prior to determining which of the five alternatives would be part of the Proposed Action. This last error bullet is a concern because it leads the reader to believe that cost of construction was the deciding factor in which power supply alternative was carried forward.

22.6

All results of the Power Supply Screening Study are lumped in an inadequate summary table (Table 5 of the document). For the Power Supply Screening Study analysis, all environmental resources are classified into two categories: Environmental Issues or Potential Environmental Issues. For areas where Environmental Issues overlapped Potential Environmental Issues, the entire area is categorized as the more restrictive Environmental Issue category and included in the summary table. This practice could mask serious environmental impacts of each power supply alternative. It is unknown to the reader how many or what type of each environmental resource is impacted. For instance, if the buffered polygons surrounding an active greater sage-grouse (*Centrocercus urophasianus*) lek incorporate several acres of wetland which may occur in the construction areas, the “potential” environmental impact to wetlands is not disclosed because the lek buffer is the more restrictive of the two.

22.7

Another example of the failure to identify all resources potentially impacted by each power supply alternative is indicated by the vague structure of Table 6 in the Power Supply Screening Study. This table identifies what environmental resources may be impacted by each alternative but fails to identify the full impacts of each alternative. For example, Table 6 identifies that each alternative has golden eagles (*Aquila chrysaetos*) nesting within two miles; however, Table 6 and the rest of the Power Supply Screening Study fails to identify how many golden eagles are nesting within two miles. This failure to disclose a quantifiable measurement for each resource does not allow the reader to truly determine impacts. Does Alternative 3 have two or 12 golden eagle nests within two miles? The reader does not receive this information for each alternative.

22.7 (continued) [Without the full and complete disclosure of all environmental impacts from each power supply alternative, the reader cannot justify why the Bureau of Land Management (BLM) chose Alternative 3 for the power supply alternative of the DEIS.

3.0 INACCURACIES OF TRANSMISSION LINE CONSTRUCTION

- The Power Supply Screening Study bases its conclusion regarding Alternative 5 on inaccurate information.

Alternative 5 of the Power Supply Screening Study is the re-building of approximately 100 miles of an existing 138 kilovolt (kV) transmission line from Jackpot, Nevada to the Long Canyon Mine Complex. Alternative 5 states that the re-built transmission line will be sited 500 feet to either side of the current transmission line, then calculates that all areas within a 1,000-foot-wide corridor (500 feet either side of the existing line) will be disturbed. This assumption that all areas within the 1,000-foot-wide disturbance corridor will be disturbed is extremely inaccurate and will give readers the impression that all new transmission lines disturb far more acreage than they actually do.

22.8 According to the Power Supply Screening Study, Alternative 5 will disturb 12,146 acres. This would not be the typical disturbance acreage associated with a 100 mile 138 kV transmission line. Construction of a transmission line requires a temporary work area around each new structure and pulling and tensioning sites to string the conductors. For a typical 138 kV transmission line on H-frame support structures, each temporary work area would encompass approximately 0.25 acre. There would be approximately eight structures per mile and a two acre pulling and tensioning site every four miles. Considering the approximate 100 mile length of Alternative 5, the actual temporary disturbance will be 200 acres of temporary work areas and an additional 50 acres of pulling and tensioning sites, for a total temporary disturbance of 250 acres.

The 12,146 acres of disturbance reported for Alternative 5 in the Power Supply Screening Study is over 48 times the amount of temporary disturbance which would accompany the typical construction of a 138 kV transmission line.

22.9 It should be noted that Alternative 5 will be a re-build of an existing transmission line. Because a line is currently in place along the proposed Alternative 5 route, many of the impacts to wildlife resources typically associated with a new transmission line would not occur. For instance, any greater sage-grouse lek identified within three miles of Alternative 5 would be acclimated to the existing line. Therefore a re-build of that existing line would not impact greater sage-grouse attending that lek. The same logic can be applied to golden eagle and other raptor nests.

22.10 Alternative 1 of the Power Supply Screening Study incorporates a new transmission line for a portion of the power delivery. The transmission line associated with Alternative 1 was only given a disturbance corridor of 50 feet, not 1,000 feet.

Respectfully submitted,



Clay R. Fitch
Chief Executive Officer

James Young
513 Ashcroft Dr.
Spring Creek, Nevada 89815
(775) - 777 - 6813

Bureau of Land Management
Long Canyon Mine Project
Attention: Whitney Wirthlin
1340 Financial Blvd.
Reno, NV 89502

April 26, 2014

Dear Whitney Whitney,

RECEIVED BY BLM

MAY 02 2014

NEVADA STATE OFFICE
RENO, NEVADA

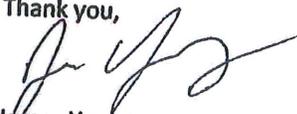
I am writing to provide comments in support of Newmont's proposed Long Canyon Mine Project. I feel that the positive aspects of the project, including its affect on the community, far outweigh any potential risks.

The impact of this project on the local economy cannot be ignored. This project is a great extension of Newmont's Carlin Operations and allows continued employment of thousands of Northern Nevadans. This project also offers the opportunity to extend employment opportunities in the Wells and Wendover communities. Newmont and its employees have been excellent community partners for years; there is every reason to believe this positive partnership will be continue and extend to Wells and Wendover. Newmont provides high quality jobs with excellent benefits and pay; additionally Newmont has significantly improved the quality of life in Northern Nevada since the company arrived on the Carlin Trend in the 1960's.

Newmont has taken every step possible to ensure that the Long Canyon Project will have a minimal impact of the environment. Newmont continually receives awards for its environmental and reclamation stewardship. This history demonstrates Newmont is committed to being stewards of the environment wherever the company operates. Although the landscape at Long Canyon will be altered once operations are finished, I am confident it will be just as viable for wildlife and livestock as the pre-mine landscape.

Because of Newmont's ability to follow through on its commitment to responsible mining and the benefits to those living in Northern Nevada, I urge the BLM team to approve this project and allow mining to move ahead as quickly as you can.

Thank you,



James Young
Senior Mine Engineer
Newmont Mining Corporation
Emigrant Operations

23.1

From: [Kristi Schaff](#)
To: [Kimberly Carter](#)
Subject: FW: Long Canyon Letter PDF
Date: Monday, May 05, 2014 1:31:35 PM
Attachments: image001.gif
Long Canyon DEIS EPA Comments.pdf
image002.png

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Kristi Schaff

JBR_logo_RGB_R.emf



Supervisor/Project Manager
JBR Environmental Consultants
595 Double Eagle Ct. Ste 2000
Reno, Nevada 89521
775.747.5777
Cell 775.397.2635

From: Wirthlin, Whitney [mailto:wwirthli@blm.gov]
Sent: Monday, May 05, 2014 12:41 PM
To: Kristi Schaff
Subject: Fwd: Long Canyon Letter PDF

Hi Kristi,
Here are EPA's comments on the DEIS. Thanks!

----- Forwarded message -----

From: Sachs, Carol <Sachs.Carol@epa.gov>
Date: Mon, May 5, 2014 at 12:31 PM
Subject: Long Canyon Letter PDF
To: "wwirthli@blm.gov" <wwirthli@blm.gov>
Cc: "Geselbracht, Jeanne" <Geselbracht.Jeanne@epa.gov>



Mr. Wirthlin
The hard copy should arrive later this week.
Thank you
Carol

--

Whitney Wirthlin
Bureau of Land Management
Nevada State Office
1340 Financial Blvd
Reno, NV 89502
Office 775.861.6568



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 2 2014

Whitney Wirthlin
Bureau of Land Management
1340 Financial Boulevard
Reno, Nevada 89520

Subject: Long Canyon Mine Draft Environmental Impact Statement (EIS), Elko County, Nevada
[CEQ #20140082]

Dear Ms. Wirthlin,

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.

24.1 We commend the Bureau of Land Management and Newmont Mining Corporation for developing an alternative to the originally proposed Long Canyon Mine project. It appears that the North Facilities Alternative, identified in the Draft EIS as the preferred alternative, would pose fewer and/or less adverse impacts to most environmental resources than would the Proposed Alternative. Nevertheless, we have some outstanding concerns regarding potential impacts to, and mitigation of, wetland/riparian resources, water quality, and air quality. For this reason, we have rated this Draft EIS as EC-2 – Environmental Concerns-Insufficient Information (see enclosed “Summary of Rating Definitions and Follow-Up Action”). We recommend that the Final EIS include a detailed wetland/riparian resources mitigation plan; provide additional information on the project’s potential impacts to surface water, groundwater, and air quality; identify cover specifications for reclaiming mine facilities; and include additional information on monitoring.

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 or geselbracht.jeanne@epa.gov.

Sincerely,

Kathleen Martyn Goforth
Manager
Environmental Review Section

Enclosures: EPA's Summary of Rating Definitions and Follow-Up Action
EPA's Detailed Comments

cc: Bryan Fuell, BLM Elko

REC'D YAM

Bruce Holmgren, Nevada Division of Environmental Protection

Steve Foree, Nevada Division of Wildlife

U.S. EPA Detailed Comments on the Draft Environmental Impact Statement for the Long Canyon Mine Project, Elko County, Nevada; May, 2014

Wetland/Riparian Resources

The Draft EIS (p. 4-31) indicates that the North Facilities Alternative would increase drawdown in the alluvial and carbonate aquifers and reduce flows in Hardy Creek and the Johnson Springs system, resulting in flow reductions of 300-500 gallons per minute at Big Springs. Flow rates at Big Springs have been as high as 2,053 gpm in November 2006 and as low as 400 gpm, under current drought conditions, in December 2013. The Draft EIS states that, because flows at Big Springs can naturally vary by as much as 1,000 gpm seasonally, the predicted 300-500 gpm reduction in flow under the proposed project could be indistinguishable from natural flow variation. EPA is concerned, however, that a flow reduction of 300-500 gpm in addition to reduced flows due to natural variation could, nonetheless, result in significant impacts to aquatic species, migratory birds, and reptiles and amphibians in these wetland/riparian areas, particularly in drought years. While the Draft EIS (p. 4-35) states that the potential reduction in wetlands does not meet BLM's policy of no net loss of wetland/riparian habitat or Elko County's Public Land Policy Plan, the Draft EIS also states that mitigation measures for wetland and riparian resources are not required. Please note that the NEPA regulations at 40 CFR 1502.14(f) and 1502.16(h) require the disclosure, in an EIS, of measures to mitigate the adverse impacts of a proposed action.

24.2

The Draft EIS (p. 2-78) indicates that Mitigation Measure W-4, which would provide greater sage-grouse brood rearing habitat enhancement and restoration within the Hardy Creek corridor at a compensation ratio of 2:1, may also provide incidental mitigation for impacts to surface water resources at Hardy Creek. It is unclear, however, what functions and values this measure might provide that would serve this purpose.

Recommendation: The Final EIS should discuss how the project's potential impacts to wetland/riparian resources, including values and functions, could be mitigated under both the proposed action and North Facilities Alternative. We strongly urge Newmont to commit to mitigating these impacts. We recommend that Newmont, BLM and the Nevada Division of Wildlife work together to develop a detailed plan that specifies monitoring requirements, action levels, and commitments to specific mitigation measures for impacts to wetland/riparian resources and each potentially affected species. We also recommend that specific commitments be made regarding Newmont's water use at various flow thresholds or resource conditions. In light of the uncertainty of groundwater pumping impacts to surface waters and wetlands, an adaptive management plan may provide an appropriate approach to mitigating impacts. The mitigation plan should be included in the Final EIS.

Water Quality Protection

24.3

In a discussion about cover/growth medium for the waste rock storage facility (WRSF), heap leach facility, and tailings storage facility (TSF), the Draft EIS (p. 4-20) states that Newmont's proposal calls for "approximately one foot of growth medium on top of and as part of the cover." The discussion includes some findings from two infiltration/drainage studies, including a finding in *Long Canyon Waste Rock Storage and Heap Leach Facilities: Assessment of Cover*

Performance (SRK, 2013b) that the cover was estimated to reduce the average infiltration from 22 percent to one percent of mean annual precipitation (MAP). That finding was based on a three-foot cover thickness, however, rather than a one-foot cover thickness. Furthermore, in *Geochemical Characterization and Predictive Modeling for the Long Canyon Project, Nevada* (2013a), SRK also reported:

“The results show that for the average infiltration rates for the 2-foot and 3-foot cover scenarios (i.e., 1% and 2% of MAP), none of the parameters are predicted to be elevated above NDEP [Nevada Division of Environmental Protection] reference values in the groundwater underlying the WRSF. This demonstrates that limiting infiltration to less than 1% to 2% of MAP should be sufficient to prevent degradation of groundwater under the facility. For higher infiltration scenarios, mercury concentrations are predicted to increase and are predicted to be slightly elevated above NDEP reference values under the maximum infiltration rates for the 2-foot and 3-foot cover scenarios (i.e., 6% and 11% of MAP).”

24.3
(continued)

The Draft EIS states, on page 4-23, that the geochemical modeling, which assumes attenuation of contaminants of concern in the top 30 feet of alluvium beneath the WRSF, is based on infiltration of three percent of MAP. The discussion on pages 4-19 and 4-20 of the Draft EIS, however, makes no connections between the studies’ findings and a conclusion that Newmont’s proposed one foot of cover material would provide sufficient reduction of meteoric water infiltration to prevent degradation of groundwater under the facilities after closure. In fact, a one-foot cover appears to conflict with the findings in the SRK reports. Additional information is needed in the Final EIS to support the above conclusion, and this information will be needed to assess the availability and cost of the specified cover material for reclamation purposes.

Recommendations: The Final EIS should:

- Discuss the closure objectives of the WRSF, heap leach facility, and TSF in terms of concentration limits for contaminants of concern seeping into groundwater, draining to the TSF, or being used for agricultural applications;
- Identify, for each facility, the maximum allowable infiltration rates, thickness, composition, and other cover specifications needed to meet the closure objectives;
- Discuss consistency of these specifications with the findings from the cover evaluations conducted for this mine; and
- Include commitments to contingency measures to be implemented in the event that the modeling proves to be incorrect.

24.4

The residual draindown from the TSF and heap leach facility (totaling approximately 42 gpm) after closure would be managed through evaporation, infiltration and/or agricultural applications. The Draft EIS (pp. 4-21, 22) indicates that spent ore may leach arsenic, antimony, thallium, and mercury. It is unclear whether and how long it may take for concentrations of parameters in TSF and heap leach draindown solutions to be reduced to below levels of concern, or how this volume of solution could be treated or otherwise managed over a period longer than the projected “active” draindown/recirculation period of six years and one year, respectively. It is understood that modeling will be refined as additional information is gathered throughout mine

24.4
(continued)

life, and that closure plans, mitigation measures, long-term costs, etc., may need to be revised accordingly based on better understanding of water management needs later in project life, and as the closure plan is developed in more detail. This does not, however, obviate the need for information in the EIS regarding the potential foreseeable closure/post-closure facilities such as evaporation ponds, evapotranspiration (ET) cells, infiltration basins, and wildlife protection measures, as well as monitoring of these facilities and solutions. This information will also be needed to calculate reclamation, closure, and potentially post-closure costs.

Recommendation: The Final EIS should describe the draindown solution management facilities that are being considered, including sizes and potential locations of ponds, ET cells, and infiltration basins; monitoring needs; and discuss any post-closure financial assurance needs to cover the cost of solution management over the long term.

24.5

Table 3.2-3 highlights that waste rock subjected to the Meteoric Water Mobility Procedure only exceeded NDEP Profile 1 values for arsenic, antimony, and mercury, but samples also exceeded the Nevada aquatic life standards for copper, lead, and selenium, which are more stringent than Profile 1 values.

Recommendation: The Final EIS should include a detailed discussion of the potential for arsenic, antimony, mercury, copper, lead, and selenium to contaminate surface water and groundwater that daylight, as well as water exposed to pit surfaces, especially in light of the proximity of the pit and other mine facilities to the range front fault system, Big Springs complex, and shallow groundwater. The discussion should specifically address attenuation capacity for these contaminants, should they reach surface waters, in the context of the aquatic life standards.

24.6

Monitoring

The Draft EIS (p. 2-71) states that surface water and groundwater wells would be monitored quarterly during operations, and wells would be monitored for three to five years after reclamation for the TSF and heap leach facility is complete, or as required by NDEP. It does not appear that surface waters would continue to be monitored after reclamation is complete, but they should be. We are concerned that three to five years of surface water and groundwater monitoring may not be sufficient to ensure that closure and reclamation measures are effectively protecting water quality, and that TSF and heap leach facility draindown solution management activities are working as designed over the long-term.

Recommendation: We recommend that water quality in both wells and surface water monitoring locations be monitored for significantly longer than five years after mine closure, as it may take decades to ensure that closure and reclamation of all mine facilities are effectively protecting water quality, and that TSF and heap leach facility draindown solution management is working as designed over the long-term. The TSF, leach pad, and WRSF should be regularly inspected throughout mine life and after closure for seeps, particularly after storms; and solution ponds, ET cells, and any seepage and/or mine drainage should be sampled so this information can be used to inform development of appropriate mitigation measures, if needed. The Final EIS should discuss

24.6 [the financial assurance needed to cover the costs of monitoring during, and potentially
(continued)] after, mine closure.

Air Quality

24.7 [The DEIS does not include the projected emissions from commute and delivery traffic to and from the mine. Because these emissions will result from the existence of operations at Long Canyon, they are part of the emissions budget for the mine. Furthermore, it does not appear that the dispersion modeling accounted for emissions from the support and delivery vehicles on the project site, from ore and carbon column hauling to and from the Carlin processing facilities, or from commute and delivery traffic to and from the mine.

Recommendation: Dispersion modeling should account for emissions from support and delivery vehicles on the project site, ore and carbon column hauling to and from the Carlin processing facilities, and commute and delivery traffic to and from the mine. The Final EIS should discuss how the new model-predicted maximum impacts could affect Prevention of Significant Deterioration increments.

We commend Newmont for providing buses and vanpools for employee commuting at its operations, which helps to reduce off-site vehicle emissions and traffic. In addition to the on-site fugitive emissions reduction measures (e.g., water and/or chemical dust suppressants) identified in the Draft EIS, additional measures can be used to control diesel particulate matter (DPM) and other criteria pollutants from fugitive sources at the mine.

Recommendation: We recommend the following additional emissions reduction measures:

- 24.8 [
- Use particle traps and other appropriate controls to reduce emissions of DPM and other air pollutants. Traps control approximately 80 percent of DPM, and specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions;
 - Lease or buy newer, cleaner equipment (1996 or newer model);
 - Employ periodic, unscheduled inspections to ensure that construction equipment is properly maintained at all times and does not unnecessarily idle, is tuned to manufacturer's specifications, and is not modified to increase horsepower except in accordance with established specifications.

From: [Kristi Schaff](#)
To: [Kimberly Carter](#)
Subject: FW: Long Canyon Project Draft EIS
Date: Monday, May 05, 2014 1:31:49 PM
Attachments: [image001.png](#)

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Kristi Schaff

JBR_logo_RGB_R.emf



Supervisor/Project Manager
JBR Environmental Consultants
595 Double Eagle Ct. Ste 2000
Reno, Nevada 89521
775.747.5777
Cell 775.397.2635

From: wwirthli@blm.gov [mailto:wwirthli@blm.gov] **On Behalf Of** ELDOLongCanyonMine, BLM_NV
Sent: Monday, May 05, 2014 12:42 PM
To: Kristi Schaff
Subject: Fwd: Long Canyon Project Draft EIS

Here is another comment. Thanks!

----- Forwarded message -----

From: Pamela Zaga <zaga06@live.com>
Date: Mon, May 5, 2014 at 12:22 PM
Subject: Long Canyon Project Draft EIS
To: "BLM_NV_ELDOLongCanyonMine@blm.gov"
<blm_nv_eldolongcanyonmine@blm.gov>

May 5, 2014

BLM, Long Canyon Mine Project
Attention: Whitney Wirthlin
BLM_NV_ELDOLongCanyonMine@blm.gov

RE: Long Canyon Project Draft EIS

To whom it may concern,

I am writing this letter in support of the proposed Long Canyon project in Elko County, Nevada. The Newmont endorsed, North Facilities Alternative, disturbs a smaller footprint over the proposed project. Compared to the Proposed Project, this smaller footprint minimizes the impact on cultural resources; moves processing and mine facilities further from municipal water and surface water sources; and lessens environmental impact to the Sage Grouse, deer migration, and Big Springs/Johnson Spring wetland system.

This project provides Elko County with the following benefits:

- Nevada Net Proceeds Tax
- Approximately 300 jobs during construction of the site
- Approximately 300-500 new mine related job opportunities to county residents with bussing to/from Wells, West Wendover, and Elko.
- Over ten years of mine life currently projected.
- Plan of Operations includes a broad range of environmental protection activities such as:
 - Concurrent reclamation minimizes the disturbance of a significant deer migration corridor. Additionally, all BLM/NDOW compensation for deer mitigation should be directed habitat restoration and enhancement of the Long Canyon area.
 - Establishing a riparian corridor as mitigation and preservation of wetlands that also allows for domestic ranching. The wetlands will provide valued habitat for all wildlife, including Sage Grouse, as well as restoring hydrologic functions and values.
 - Re-vegetation efforts should complement wildlife habitat, fire management, and domestic livestock objectives.
 - Excavation and preservation of cultural resources within the mine disturbance area.

25.1

Please approve the advancement of this well studied and beneficial project.

Regards,

Pam Zaga
Elko County, Nevada Citizen

From: [Kristi Schaff](#)
To: [Kimberly Carter](#)
Subject: FW: State Agency Comments E2014-115 DEIS - Long Canyon Mine - Pequop Range
Date: Monday, May 05, 2014 2:27:44 PM
Attachments: E2014-115 NDOT2 (DEIS - Long Canyon Mine - Pequop Range).pdf
E2014-115 NDWR DEIS - Long Canyon Mine - Pequop Range.pdf
E2014-115 NDEP (DEIS - Long Canyon Mine - Pequop Range).pdf
E2014-115 NDOT (DEIS - Long Canyon Mine - Pequop Range).pdf
image001.png

More comments.

--

Kristi Schaff

JBR_logo_RGB_R.emf



Supervisor/Project Manager
JBR Environmental Consultants
595 Double Eagle Ct. Ste 2000
Reno, Nevada 89521
775.747.5777
Cell 775.397.2635

From: Wirthlin, Whitney [mailto:wwirthli@blm.gov]
Sent: Monday, May 05, 2014 2:20 PM
To: Kristi Schaff
Subject: Fwd: State Agency Comments E2014-115 DEIS - Long Canyon Mine - Pequop Range

Hi Kristi,
Attached are the comments from the Nevada Clearinghouse. Thanks!

----- Forwarded message -----

From: Skip Canfield <scanfield@lands.nv.gov>
Date: Mon, May 5, 2014 at 2:16 PM
Subject: State Agency Comments E2014-115 DEIS - Long Canyon Mine - Pequop Range
To: "wwirthli@blm.gov" <wwirthli@blm.gov>,
"BLM_NV_ELDOLongCanyonMine@blm.gov"
<BLM_NV_ELDOLongCanyonMine@blm.gov>
Cc: Skip Canfield <scanfield@lands.nv.gov>

Whitney:

The Nevada State Clearinghouse received the attached comments and the comments below regarding the Long Canyon Mine - Pequop Range.

Skip Canfield
Nevada State Clearinghouse
State Land Use Planning Agency

*Nevada Division of State Lands
Department of Conservation and Natural Resources
901 South Stewart Street, Suite 5003
Carson City, NV 89701
775-684-2723
<http://clearinghouse.nv.gov>
www.lands.nv.gov*

The Nevada Division of State Lands and the State Land Use Planning Agency offer the following comments:

26.1 [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 should be required:

Utilize appropriate lighting:

- 26.2 [
- 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.

26.3 [**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.

26.3
(continued)

- 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.

Skip Canfield
State Land Use Planning Agency

--
Whitney Wirthlin
Bureau of Land Management
Nevada State Office
1340 Financial Blvd
Reno, NV 89502
Office 775.861.6568

Skip Canfield

From: Ratliff, Boyd A <BRatliff@dot.state.nv.us>
Sent: Wednesday, April 02, 2014 8:30 AM
To: Skip Canfield; Ison, Mitch
Subject: FW: Nevada State Clearinghouse Notice E2014-115 (DEIS - Long Canyon Mine - Pequop Range)

Skip and Mitch,

More comments regarding the Long Canyon Mine Development. Thank you.

Boyd Ratliff
District III Traffic Engineer
1951 Idaho Street
Elko, NV 89801
T: 775-777-2700 F: 775-777-2705

From: Sherwood, Joanne M
Sent: Tuesday, April 01, 2014 4:45 PM
To: Ratliff, Boyd A; Murphy, Michael E; Demaline, Jason D
Subject: RE: Nevada State Clearinghouse Notice E2014-115 (DEIS - Long Canyon Mine - Pequop Range)

I see several potential problems at first glance, including impacting 3 material sites.

Proposed pipeline route:

27.1

1. The proposed pipeline appears to be within the NDOT ROW on SR-233 from Montello to the south side of IR-80 (based on included maps and previous conversation with Newmont's landman). SR-233 ROW is 100' each side of centerline for that entire length. Possible permitting issues: UPR crossing, IR-80, BLM right-of-way grant areas, private owners where we have an easement only, our own environmental, etc. Longitudinal long-haul permits must show a public benefit for the utility to be in the NDOT ROW.
2. NDOT has a comm. facility ("Loray") within the NDOT ROW at MP EL-13.45 adjacent to Material Site NEV054650.
3. NDOT has two material sites on this portion of SR-233 which will be impacted if the pipeline is out of the NDOT ROW: NEV054650 (no EL number) and NEV054649 (EL35-01). The easterly portions of both are currently used but they both extend to the westerly side of the highway as well.

27.2

NDOT also has a material source on the south side of IR-80 just east of the Oasis interchange, NVN 000958, which is adjacent to the west edge of the actual project area. Closing County Road 790 south of IR-80 (as previously proposed) would cut off our access to this material source. Note: we may or may not have legal access to this pit.

--Jo Sherwood

From: Ison, Mitch
Sent: Tuesday, March 25, 2014 3:58 PM
To: Murphy, Michael E; Cooke, Steve M; Salazar, Halana D
Subject: FW: Nevada State Clearinghouse Notice E2014-115 (DEIS - Long Canyon Mine - Pequop Range)

Please send me any comments by May 2nd, 2014. Thanks.

From: scanfield@lands.nv.gov [<mailto:scanfield@lands.nv.gov>]

Sent: Monday, March 24, 2014 3:07 PM

To: ajenne@ndow.org; clytle@lincoln.nv.com; bhrdnbrk@ndow.org; cohn1@nv.doe.gov; lprice@govmail.state.nv.us; markfreese@ndow.org; PeteA@forestry.nv.gov; rharvey@forestry.nv.gov; squillci@dcnr.nv.gov; Mueller, Timothy; Tod.oppenborn@nellis.af.mil; zip.upham@navy.mil; alanza@ndep.nv.gov; dmarlow@lands.nv.gov; Shimi.Mathew@nellis.af.mil; craig.mortimore@wildnevada.org; njboland.nev@gmail.com; jcrandell@crc.nv.gov; eharrison@lands.nv.gov; 99abw.ccy@nellis.af.mil; whenderson@nvleague.org; dstapleton@nvnaco.org; alisah@unr.edu; Rebecca.Palmer@nevadaculture.org; ed.rvbold@navy.mil; srupert@govmail.state.nv.us; kirk.bausman@us.army.mil; Jscanland@parks.nv.gov; dmouat@dri.edu; AWMaffei@doit.nv.gov; MBedeau@nevadaculture.org; scanfield@lands.nv.gov; brian.hunsaker@us.army.mil; bhartnett@energy.nv.gov; **Ison, Mitch**; wturkett@crc.nv.gov; mvisher@govmail.state.nv.us; JBALDERSON@ndep.nv.gov; plassaline@ndep.nv.gov; Van Havel, Jason D; llesmeister@ndow.org; sfree@ndow.org; menders@ndow.org; jctull@ndow.org; jcrist@forestry.nv.gov; rmperry@govmail.state.nv.us; timrubald@sagebrushco.nv.gov; kjhill@energy.nv.gov; jwoodruff@puc.nv.gov; BWhitney@washoecounty.us; endacottsteve@charter.net; jered.mcdonald@lcb.state.nv.us; mkolada@ndow.org; rwarnold@hotmail.com; lkryder@co.nye.nv.us; jernstein@shpo.nv.gov; jdmore@heritage.nv.gov; jnewmark@heritage.nv.gov; JBWalker@ndep.nv.gov; ddavis@unr.edu; munteanj@unr.edu; jprice@unr.edu; kbeckley@health.nv.gov; jhardcas@unr.edu; mpharris@puc.nv.gov; trubald@tax.state.nv.us; robertm@water.nv.gov; rewell@tax.state.nv.us; mstewart@lcb.state.nv.us; sscholley@lcb.state.nv.us; clawson@ndep.nv.gov; efoster@agri.state.nv.us; brenda@cwsd.org; gderks@dps.state.nv.us; Madams@ag.nv.gov; WHowle@ag.nv.gov
Subject: Nevada State Clearinghouse Notice E2014-115 (DEIS - Long Canyon Mine - Pequop Range)



NEVADA STATE CLEARINGHOUSE

Department of Conservation and Natural Resources, Division of State Lands
901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246
(775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 03/24/2014

U.S. Bureau of Land Management

Nevada State Clearinghouse Notice E2014-115

Project: DEIS - Long Canyon Mine - Pequop Range

Follow the link below to find information concerning the above-mentioned project for your review and comment.

[E2014-115 -](#)

http://www.blm.gov/nv/st/en/fo/elko_field_office/blm_information/nepa/long_canyon_eis_7.html

- **Please evaluate this project's effects on your agency's plans and programs and any other issues that you are aware of that might be pertinent to applicable laws and regulations.**
- **Please reply directly from this e-mail and attach your comments.**

- **Please submit your comments no later than Friday May 2nd, 2014.**

If you have any comments, please respond directly to the Clearinghouse.

[Clearinghouse project archive](#)

Questions? Skip Canfield, Program Manager, (775) 684-2723 or nevadaclearinghouse@lands.nv.gov

___ No comment on this project ___ Proposal supported as written

AGENCY COMMENTS:

Signature:

Date:

Requested By:

Distribution:

- 99ABW Nellis
- Division of Emergency Management
Alan Jenne - Department of Wildlife, Elko
Alex Lanza -
Alisa Huckle - UNR Library
Alisanne Maffei - Department of Administration
Bert Bedeau - Comstock Historic District Commission
Bette Hartnett - State Energy Office
Bill Whitney - Washoe County Planning
Brenda Hunt - CWSD
CPT Brian Hunsaker - Nevada National Guard
Cliff Lawson - Nevada Division of Environmental Protection
Cory Lytle - Lincoln County
Craig Mortimore - Wild Nevada
D. Bradford Hardenbrook - Department of Wildlife, Las Vegas
Dagny Stapleton - NACO
Dave Marlow -
David David - UNR Bureau of Mines
David Mouat - Desert Research Institute
Ed Foster - Department of Agriculture

Ed Rybold - NAS Fallon
Elizabeth A. Harrison - Tahoe Resource Team - Division of State Lands
Gary Derks - Division of Emergency Management
J Crandell - Colorado River Commission of Nevada
James D. Morefield - Natural Heritage Program
Jason Van Havel - NDOT
Jason Woodruff - PUCN
Jeff Hardcastle - State Demographer
Jennifer Newmark -
Jennifer Scanland - Division of State Parks
Jered McDonald - Legislative Counsel Bureau
Jim Balderson - NDEP
John Christopherson - Nevada Division of Forestry
John Muntean - UNR Bureau of Mines
John Tull - NDOW
John Walker - Nevada Division of Environmental Protection
Jon Price - UNR Bureau of Mines
Julie Erstein - State Historic Preservation Office
Karen Beckley - State Health Division
Kevin Hill - Nevada State Energy Office
Kirk Bausman - Hawthorne Army Depot
Levi Kryder - Nye County
Linda Cohn - National Nuclear Security Administration
Lindsey Lesmeister - NDOW
Lowell Price - Commission on Minerals
Mark Enders - NDOW
Mark Freese - Department of Wildlife
Mark Harris, PE - Public Utilities Commission
Marta Adams - Attorney General
Michael J. Stewart - Legislative Counsel Bureau
Michael Visser - Division of Minerals
Mitch Ison - NDOT
Moira Kolada - NDOW
Nancy Boland - Esmeralda County
Pete Anderson - Division of Forestry
Peter Lassaline - NDEP
Rebecca Palmer - State Historic Preservation Office
Rich Harvey - Division of Forestry
Rich Perry - Nevada Division of Minerals
Richard Arnold - Nevada Indian Commission
Robert Martinez - Division of Water Resources
Sandy Quilici - Department of Conservation & Natural Resources
Sherry Rupert - Indian Commission
Shimi Mathew - Nellis AFB
Skip Canfield - Division of State Lands
Stephen Foree - NDOW
Steve Endacott - City of Fallon
Susan Scholley - Legislative Counsel Bureau
Terry Rubald - Nevada Department of Taxation, Local Government, Centrally Assessed Property
Tim Rubald - Nevada Sagebrush Ecosystem Team
Timothy Mueller - Department of Transportation
Tod Oppenborn - Nellis Air Force Base
Warren Turkett - Colorado River Commission of Nevada
Wayne Howle - Attorney General
Wes Henderson - Nevada League of Cities
Zip Upham - NAS Fallon

This communication, including any attachments, may contain confidential information and is intended only for the individual or entity to whom it is addressed. Any review, dissemination or copying of this communication by anyone other than the intended recipient is strictly prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and delete all copies of the original message.

Nevada State Clearinghouse

Department of Conservation and Natural Resources

901 South Stewart Street, Suite 5003

Carson City, NV 89701

775-684-2723

<http://clearinghouse.nv.gov>

www.lands.nv.gov

DATE: 4/14/2014

Division of Water Resources

Nevada SAI # E2014-115

Project: (DEIS - Long Canyon Mine - Pequop Range)

_____ No comment on this project Proposal supported as written

AGENCY COMMENTS:

Any person proposing to alter a dam in this state shall, before constructing, reconstructing or altering in any way any dam, notify the State Engineer and must submit to the State Engineer in triplicate plans and specifications thereof for his approval in accordance with Nevada Revised Statute Chapter 535 and Nevada Administrative Code Chapter 535 prior to construction is to begin.

28.1

All waters of the State belong to the public and may be appropriated for beneficial use pursuant to the provisions of Chapters 533 and 534 of the Nevada Revised Statutes (NRS), and not otherwise. Any water used on the described project for construction, dust control, or maintenance should be provided by an established utility or under a permit.

Any water wells or monitor wells that are proposed to be drilled within the described lands are the ultimate responsibility of the entity allowing the drilling to occur and must be plugged and abandoned as required in Chapter 534 of the Nevada Administrative Code.

28.2

A search of water rights in the proposed mining area revealed that Fronteer Development (USA) Inc., Elko Land and Livestock Company, the City of West Wendover Nevada and the City of Wendover Utah, Wendover Project and Star Living Trust, are listed as owner of record of active Permitted water rights. .

If you have any questions, please contact this office at (775) 684-2800.

Sincerely,

P. Luke Opperman
Water Resource Specialist II

PLO/

E2014-115 (DEIS - Long Canyon Mine - Pequop Range)

AGENCY COMMENTS:

- 29.1 Please be aware that the proposed Long Canyon Mine potable water system 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. Additionally, any alternative water supply (drinking water wells and associated infrastructure) provided by Newmont to replace a portion of West Wendover's current water supply which comes primarily from the Big Springs, will also need to have the plans and specifications submitted to the 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.
- 29.2

Signature: Jim Balderson



Date: 04/15/2014

Jim Balderson P.E., Engineering Supervisor
Bureau of Safe Drinking Water
901 S. Stewart Street, Ste 4001
Carson City, NV89701
775-687-9517
jbalderson@ndep.nv.gov

NDOT District III Comments for Nevada State Clearinghouse Notice E2014-115 (DEIS - Long Canyon Mine - Pequop Range

Review of the proposed plan performed on March 25, 2014 and comments by Boyd Ratliff,
District III Traffic Engineer.

Please consider the following comments for incorporation to the proposed development:

- 30.1 [1. Proposed development must include provisions for complying with the Clean Water Act through a Stormwater Pollution Prevention Plan that includes mitigation for, but is not limited to, track out onto highways, drainage onto or through State Right of Way, and any other impacts, either direct or indirect.
- 30.2 [2. Proposed development must include provisions to mitigate and manage noxious weeds caused to be in State Highway Right of Ways from the proposed development.
- 30.3 [3. Proposed development must provide written use agreements with any permittee for existing permitted accesses.
- 30.4 [4. Proposed development must perform a Traffic Study to adequately assess the impact of highway use caused by the development. Results of the study may require the developer to provide and follow a Transportation Safety Management Plan. A Transportation Safety Management Plan may include, but is not limited to, mitigation of traffic impacts by Traffic Control Plans, flaggers, truck crossings, warning signs, etc. that meet the requirements of the MUTCD and NDOT. All such plans shall be submitted for approval to the District III office.
- 30.5 [5. Subsequent analysis of operations and impacts on State Highways will be performed by the Nevada Department of Transportation. Results of any such analysis by NDOT may cause additional limitations of operations including, but not limited to, reduced weight limits and route changes. Results of any analysis may require repairs and/or improvements to the Highway System to mitigate damage or safety.
- 30.6 [6. Highway routes in Nevada may become subject to Frost Law's at anytime. Frost Law reduces legal load weights due to critically sensitive roadbeds during cold & wet seasons. Haul routes may be impacted.
- 30.7 [7. Use of development proposed borrow material sites that are adjacent to NDOT designated material sources shall not encroach or impact use of NDOT

30.7 [designated sources by NDOT. This includes, but is not limited to, access,
(continued)] environment, or materials.

	Commenter	Chapter	Page Number	Comment
31.1	NDOW	ES	13	Greater Sage Grouse: Does the impacted acreage(2,785) include public and private? Please show the acreage separated into these categories.
31.2	NDOW	3	155	Both the Murdock and West Cobre leks were active in 2014 per Scott Roberts, NDOW. Previous information suggested that in 2009 the Murdock lek no birds were observed.
31.3	NDOW	3	161-162	Range Resources: - There should be a description of what significant range improvements have been or will be implemented to facilitate an increase of AUMs in the associated allotments. - There should also be a description of the range management objectives that will need to be attained prior to the sizable increases in AUMs.
31.4				- There has been conversations as to the use of private lands within the East Big Springs Allotment to mitigate for the proposed disturbances to GSG habitat. It is unclear as to how increasing AUMs within the allotment will aid in restoring and/or protecting the limited priority habitat within and near the project area.
31.5	NDOW	4	94	The document indicates under mitigation measure #4 that development of a conservation easement "would" include. It is our view that "would" should be changed to "could" or "may". There is no guarantee that we will come to agreement on the goals and objectives for a conservation easement on the Big Springs Ranch.
31.6	NDOW	4	94	Mitigation Measure #4. We are still somewhat uncomfortable with the provision of a credit for long term assurances for habitat protection on private land. While we understand in concept as identified in the Mining MOU, however the idea that habitat losses will occur on public lands and to compensate for these losses we will be enhancing and/or protecting habitat on private land owned by the proponent is somewhat bothersome. Furthermore in conversation with NDOW Reno staff how this credit would be applied is in question. We need to seek clarification from our perspective State offices whether the credit is provided before or after we apply the 3:1, 2:1 compensation.
31.7	NDOW	4	94	Mitigation Measure #4. We need to identify that all offsite habitat enhancement projects as a result of mitigation for sage-grouse will occur within the East Valley PMU or an adjacent PMU.
31.8	NDOW	4	94	We need to identify the concept that should no agreement be reached on the goals and objectives of a conservation easement on Newmont owned private land, mitigation for loss of sage-grouse habitat on public lands would default to the off-site mitigation ratios of 3:1 for PPH and 2:1 for PGH and that an off site mitigation account would be developed under MOU between Newmont, BLM and NDOW.
31.9	NDOW	4	95	Will the wording of the development of Eagle conservation plan be changed since USFWS has decided that wind energy is a priority?

	Commenter	Chapter	Page Number	Comment
31.10	NDOW	4	102	Comments provided for sage-grouse mitigation measures specific to the proposed action also apply to the North Alternative.
31.11	NDOW	General		The mule deer seasonal distribution map needs to be updated to reflect appropriate crucial mule deer winter range into the South Pequops
31.12	NDOW	General		NDOW would like to see a representation of the socioeconomics of Area 7 mule deer herd and the economic impact recreation use of this herd provides to the surrounding communities. USFWS puts a census out depicting monetary values for hunting in Nevada. Please use this source for information and reference this census from 2011 in the EIS.
31.13	NDOW	General		At some place in the EIS we need to discuss the development of a monitoring plan which provides the specifics of the mule deer collaring program and the potential for adaptive management as an outgrowth of this monitoring effort. Adaptive management strategies could include adjustments to berm location, lay down fence locations, as well as potential travel management restrictions during the key hours of the day during the migration season. While we understand that haul truck traffic most likely cannot be affected by such restrictions we should look at the basic human presence in the migratory corridor to see what actions we can take to facilitate ease of deer movement through the project area during migration periods. The WWG, previously developed, could address any potential issues and adaptive management strategies specific to this monitoring effort. NDOW has previously provided a draft mule deer monitoring plan and we have attached the plan for reference.
31.14	NDOW	General		The recreational aspect of hunting Area 7 isn't truly depicted, along with what the impacts of the road closure on accessing the South Pequops for hunting/trapping and other forms of recreation.



Pilot Gold (USA) Inc.
Suite 110
1031 Railroad Street
Elko, Nevada
USA 89801 3975

pilotgold.com

T 775 777 2900
F 775 777 2901

May 5, 2014

Bureau of Land Management
Long Canyon Mine Project
Attn: Whitney Wirthlin
1340 Financial Blvd.
Reno, NV 89502

Re: Draft Environmental Impact Statement, Long Canyon Mine Project

Dear Ms. Wirthlin:

Pilot Gold (USA) Inc. fully supports the North Facilities Alternative for the Long Canyon Mine Project in Elko County, Nevada. Pilot Gold believes the North Facilities Alternative will benefit Elko County and the State of Nevada with enhanced environmental protection measures, including:

32.1

- Enhanced protection of wetland and riparian zones
- Expanded wildlife migration corridors
- Mining and facilities positioned above the groundwater table
- Better public access to the California Trail Hastings Cutoff via county easement

Please contact me at 775-777-2900 or gheston@pilotgold.com if you have questions about this letter.
Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "G. Heston", is written over a light blue horizontal line.

Gerald S. Heston
GIS Manager, Land, & Permitting

MAYOR
Mike Crawford

CITY ADMINISTRATOR
Glenn Wadsworth



CITY COUNCIL

Ms. Karen Shepherd
Mr. Lamar Melville
Mr. Dennis Sweat
Ms. Mandolin Hunt
Mr. Tom Carlisle

May 01, 2014

Bureau of Land Management
Long Canyon Mine Project
Attention: Whitney Wirthlin
1340 Financial Boulevard
Reno, Nevada 89502

Dear Ms. Wirthlin:

The City of Wendover, Utah would like to thank you for taking the time to present for discussions the Long Canyon Mine Project. It is very helpful for our Citizens and City Representatives to be able to communicate freely and openly with Newmont and The Bureau of Land Management with regards to the Long Canyon Mine Project.

33.1

The City of Wendover, Utah in conjunction with West Wendover have had the opportunity to meet with Newmont representatives numerous times and discuss the concerns with respect to water and the impact(s) the projected surface mine may have on the communities as well.

Therefore, the City of Wendover, Utah sustains the Long Canyon Mine project and the benefits it may bring to the communities.

Yours Truly,

Mike Crawford
Mayor

RECEIVED BY BLM
MAY 05 2014
NEVADA STATE OFFICE
RENO, NEVADA

From: [Kristi Schaff](#)
To: [Kimberly Carter](#)
Subject: FW: FW: City of Elko Letter of Comment
Date: Wednesday, May 07, 2014 3:25:18 PM
Attachments: [Letter of Comment.pdf](#)
[image001.png](#)

Kim

Here is the latest comment letter.

--

Kristi Schaff



Supervisor/Project Manager
JBR Environmental Consultants
595 Double Eagle Ct. Ste 2000
Reno, Nevada 89521
775.747.5777
Cell 775.397.2635

From: Wirthlin, Whitney [mailto:wwirthli@blm.gov]
Sent: Wednesday, May 07, 2014 2:18 PM
To: Kristi Schaff
Subject: Fwd: FW: City of Elko Letter of Comment

The City of Elko never sent the letter, so here it is attached. Thanks!

----- Forwarded message -----

From: Curtis Calder <ccalder@ci.elko.nv.us>
Date: Wed, May 7, 2014 at 2:13 PM
Subject: FW: City of Elko Letter of Comment
To: "Wirthlin, Whitney (wwirthli@blm.gov)" <wwirthli@blm.gov>
Cc: "Pamela Smith (Pamela.Smith@newmont.com)" <Pamela.Smith@newmont.com>

Hi Whitney,

I sent the attached letter to the designated email address, but wanted to send you a copy as well. Sorry for the delay.

Thanks!

Curtis

From: Curtis Calder
Sent: Wednesday, May 07, 2014 2:02 PM
To: 'BLM NV ELDOLongCanyonMine@blm.gov'

Subject: City of Elko Letter of Comment
Importance: High

Attn: Whitney Wirthlin

Please accept the attached letter regarding the Long Canyon Mine Project DEIS. The Elko City Council approved the letter on April 22, 2014 and it was signed on April 28, 2014. For some unknown reason, it was not mailed upon signature.

Sincerely,

Curtis Calder
Elko City Manager

--

Whitney Wirthlin
Bureau of Land Management
Nevada State Office
1340 Financial Blvd
Reno, NV 89502
Office 775.861.6568



City of Elko
City Hall
 1751 College Avenue
 Elko, Nevada 89801
 Phone: 775-777-7110
 Fax: 775-777-7119

April 28, 2014

Bureau of Land Management
 Nevada State Office
 Attn: Whitney Wirthlin
 1640 Financial Blvd.
 Reno, NV 89502

RE: Long Canyon Mine Project DEIS Letter of Comment

Dear Ms. Wirthlin:

34.1 The City of Elko has reviewed the Long Canyon Mine Project’s Draft Environmental Impact Statement (DEIS) and has prepared this letter of comment. The letter addresses only those areas that might impact Elko as discussed in the Executive Summary and in Section 3.16, Socioeconomics. The mission statement for the City of Elko includes the term “enabling economic development”. We believe it is appropriate to provide comments on this important regional project.

With regard to the Executive Summary, it is noted that the project will “strain the currently available temporary and long-term housing resources in Elko County, especially in Elko.” However, the City of Elko has significantly increased long-term housing resources over the past two (2) years. In Calendar Years 2012 and 2013, 214 single-family and multi-family residential units were completed. Additionally, four (4) single-family subdivisions and one (1) large multi-family apartment complex are currently under construction. Plans for additional subdivisions, multi-family residential projects, and hotels have been approved and are pending construction.

34.2 The DEIS estimates employment during construction will average 350 workers for 18 months. The study further estimates that 40% will be hired from the local workforce. Section 3.16 correctly identifies the temporary housing resources in the surrounding communities that could easily accommodate a construction labor force of this size. The City of Elko alone has 31 motels with 1890 rooms, and 7 RV Parks with 518 available spaces. In the event that the construction labor force resides in Elko, we do not anticipate any negative impacts associated with this project. Our hotel, motel, RV Park owners, and local businesses would welcome this additional business and the City would welcome the room tax revenue it generates.

Bureau of Land Management

April 28, 2014

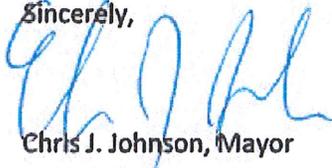
Page Two

After construction, the DEIS estimates 360 permanent jobs at the Long Canyon Mine Project. Since Newmont Mining Corporation maintains a regional office and a large contingent of employees in Elko, we anticipate a significant portion of these permanent employees will reside in Elko and commute to the mine site.

Elko has experienced significant growth in the private sector from mining and other natural resources, transportation, energy, and regional warehousing. In 2011, the City completed a major update of its Master Plan and is well prepared for future growth. There is developable land within the City limits, ample water supply and sewage infrastructure, a class 1 Regional landfill, a regional airport serviced by daily flights, and a philosophy that welcomes planned growth, new citizens, and new businesses. We do not see any major impacts if a significant portion of Long Canyon's work force choose to live in Elko. The sales and property taxes these new residents would add would help mitigate the cost of additional services the City provides.

The DEIS also assumes some indirect employment will be created. Elko is the regional retail, industrial, transportation, entertainment, and post-secondary education hub for Northeastern Nevada. This added business will have a favorable impact on direct and indirect employment, sales and property taxes, and business fees.

Sincerely,



Chris J. Johnson, Mayor
City of Elko

Cc: Elko City Council
File

34.2
(continued)