

**DRAFT PLAN OF DEVELOPMENT
PROPOSED CONVEYOR BELT AND ACCESS ROAD TO
LOCKWOOD INVESTMENTS PROPERTY**

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May 6, 2015, Amended November 2, 2015, and Amended February 11, 2016

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ABBREVIATIONS

APN	Assessor's Parcel Number
BLM	Bureau of Land Management, Carson City District Office, Sierra Front Field Office
BMP	Best Management Practices
BR	Bureau of Reclamation
FLPMA	Federal Land Policy and Management Act of 1976
Granite	Granite Construction Company
I-80	Interstate 80
LR 2000	Land and Mineral Legacy Rehost 2000 System
mph	Miles per Hour
MSHA	Mine Safety and Health Administration
NAC	Nevada Administrative Code
NDEP	Nevada Division of Environmental Protection
POD	Plan of Development
ROW	Right-of-Way
SF299	Standard Form 299
U.S.	United States

1.0 INTRODUCTION

Granite Construction Company (Granite) has prepared this Plan of Development (POD) describing the construction and operation of a portion of a conveyor belt and access road on public land administered by the United States (U.S.) Department of the Interior, Bureau of Land Management, Carson City District Office, Sierra Front Field Office (BLM). The proposed project is located in Washoe County, Nevada, north of Interstate 80 (I-80), approximately three miles east of the City of Sparks (Figure 1).

In order to construct and operate the conveyor belt and access road across BLM-administered public land, the project will require a right-of-way (ROW) grant from the BLM. To initiate the grant process, Granite will submit to BLM a Standard Form 299 (SF299) Application for Utility and Transportation Systems on Federal Lands and this POD describing the project. The SF299 and this POD describe only the sections of conveyor belt and road that would be located on BLM-administered public land.

This POD follows BLM guidance outlined in "Obtaining a Right-of-Way on Public Lands" (BLM, 2009), and contains the following project details:

- Purpose and Need;
- ROW Location;
- Facility Design Factors;
- Additional Components;
- Government Agencies Involved;
- Construction of Facilities;
- Resource Values and Environmental Concerns;
- Stabilization Required;
- Operation and Maintenance; and
- Termination and Restoration.

2.0 PURPOSE AND NEED

The purpose of the access easement is to provide Granite the opportunity to construct, operate, and maintain portions of an overland conveyor belt and access road to transport personnel and raw aggregate material to Granite's property (Washoe County Assessor's Parcel Number [APN] 084-060-37), from private property owned by Lockwood Investments (APN 084-060-13). The need for the action is established by the BLM's responsibility under Section 501 of the Federal Land Policy and Management Act of 1976 (FLPMA) to respond to an applicant's request for a ROW grant over public-administered lands.

A. WHAT WILL BE BUILT

Granite Construction has applied for a ROW grant authorization to construct, operate and maintain portions of an overland conveyor belt and access road to transport personnel and raw aggregate material to Granite's property (Washoe County APN 084-060-37), from private property owned by Lockwood Investments (APN 084-060-13). Granite proposes to begin using the ROW in the spring of 2016. The proposed ROW would be needed for at least 30 years.

B. WHAT IS THE USE

The proposed ROW would allow access from private land owned by Granite (APN 084-060-37) to private land owned by Lockwood Investments Company, Ltd. (APN 084-060-13), and would allow the transporting of material and personnel between the two properties. The proposed project would include the construction of both a conveyor belt and an access road. The conveyor belt would be the primary means of transporting raw aggregate material, and the road would be used for vehicle access to and from private property and for construction and maintenance of the conveyor belt. The road may also be used to transport raw material via haul trucks.

C. WHAT IS THE SIZE

The proposed ROW on BLM administered land would be approximately 400 feet wide and 571 feet long. These measurements were determined by taking the greatest extent of the proposed ROW that would occur on BLM administered land. All authorized actions would take place within this proposed ROW. The proposed ROW authorization would only apply to public land portions of the proposed project.

The total proposed ROW area would be 2.1 acres in order to incorporate the embankment slopes adjacent to the road. However, the total acres of disturbance on BLM administered land associated within the proposed ROW would be 1.8 acres. This disturbance acreage was determined from the total extents of disturbance associated with the road, conveyor belt, drainage swales and embankments. The access road/conveyor belt disturbance area would measure approximately 30 feet wide, with 15 feet for the road travel way, four feet for the conveyor belt, and 5.5 feet on each side of the road for the road shoulders and drainage swales

(Figure 2 and Figure 3). The remainder of the proposed ROW (approximately 370 feet) would consist of the embankment slopes on the side of the roads, with 240 feet of the proposed ROW on APN 084-060-16 consisting of embankment slope and 130 feet of the proposed ROW on APN 084-060-14 consisting of embankment slope.

D. NEW CONSTRUCTION, RE-CONSTRUCTION, OR IMPROVEMENT

The proposed project would consist of a newly constructed road, conveyor belt, and associated embankment slopes. The proposed ROW would be a new ROW grant authorization on BLM administered land. The project would not include re-construction or improvements to existing roads within an existing ROW.

E. TEMPORARY OR PERMANENT

The road and conveyor belt would be used and maintained year-round for the life of operations associated with extraction and transporting raw aggregate material from private property (APN 084-060-13), at which time the conveyor belt would be removed and the road would be reclaimed and completely closed.

F. ANCILLARY TO AN EXISTING ROW

This proposed ROW is not ancillary to any existing ROWs.

G. TYPE AND VOLUME OF ANTICIPATED TRAFFIC

The volume of traffic anticipated is seasonal and based on the demand for aggregate material. The proposed ROW would be used 365 days a year, seven days a week, depending on weather conditions. Hours of operations would typically occur during daylight hours, but operations may occur up to 24 hours per day. The most frequent use of the proposed ROW would be in the months of March through November. The conveyor belt would handle most of the transferring of aggregate material from APN 084-060-13 to APN 084-060-37, so actual truck traffic (i.e. haul trucks and pick-up trucks) on the road would be reduced after the conveyor belt is constructed and fully operational. However, during construction of the road and conveyor belt, during the initial stages of operations, and for maintenance activities, vehicle traffic may result in up to 25 vehicle trips per hour. The types of vehicles that are anticipated to use the road would include excavators, bulldozers, graders, water trucks, haul trucks and pickup trucks. The road would not be open to the public, so typical public passenger traffic would not occur within the proposed ROW.

H. SEASON OF USE

Construction of the road, conveyor belt and embankment slopes, and operation and maintenance within the proposed ROW would occur 365 days a year, seven days a week, depending on weather conditions. Hours of operations would typically occur during daylight

hours, but operations may occur up to 24 hours per day. The most frequent use of the proposed ROW would be in the months of March through November.

I. ORIENTATION AND DESTINATION OF THE ROAD

The proposed ROW would allow access from private land owned by Granite (APN 084-060-37) to private land owned by Lockwood Investments Company, Ltd. (APN 084-060-13).

J. ALTERNATIVES ROUTES OR LOCATIONS

Alternative 1

Alternative 1 is the Proposed Action as described above which would allow portions of a road and conveyor belt to be constructed on APN 084-060-16 and APN 084-060-14 to allow access from private land owned by Granite (APN 084-060-37) to private land owned by Lockwood Investments Company, Ltd. (APN 084-060-13).

Alternative 2

Alternative 2 would require haul trucks traveling from Granite's Lockwood Facility to travel eastbound on I-80 to Exit 23, then cross under I-80 using the underpass at the intersection of Exit 23 and Independence Avenue, and then travel along the unnamed frontage road northwest traversing APN 084-060-14 to access APN 084-060-13 (Figure 4). This alternative would cross BLM and Bureau of Reclamation (BR) administered land on APN 084-060-14. This alternative was eliminated from detailed analysis because of the environmental impacts that would result from increased haul truck traffic on I-80, and the increased potential for dust as a result of transporting aggregate material longer distances. The increased haul truck traffic on I-80 would result in potential public safety concerns. A ROW application processed through the BLM and the BR would be required for Alternative 2.

Alternative 3

Alternative 3 would require haul trucks traveling from Granite's Lockwood facility to travel eastbound on I-80 to Exit 23, and then cross under I-80 using the underpass at the intersection of Exit 23 and Independence Avenue. The haul trucks would then follow the unnamed frontage road paralleling I-80 northeast to several private roads to access the proposed mine (Figure 4). This alternative was eliminated from detailed analysis because of the environmental impacts that would result from increased haul truck traffic on I-80 and the increased potential for dust resulting from transferring aggregate material longer distances. The increased haul truck traffic on I-80 would result in potential public safety concerns. Implementation of this alternative would require Granite to enter into agreements with private landowners and secure easements on private property. If Granite was unable to secure these easements and agreements from the private landowners, this alternative would not be implemented and Granite would have to find other means to access their property. Use of this alternative would not require federal authorization as vehicular use of the frontage road is under the responsibility of the Nevada Department of Transportation (NDOT).

Alternative 4

Alternative 4 would co-locate the road and conveyor belt with the Martin Marietta Materials' mining authorization (NVN 053288) which is an existing authorization on BLM administered land in the N ½ NW ¼ Section 16, Township 19 North, Range 21 East. This alternative would allow the road and conveyor belt to be constructed in an area with previously authorized aggregate mining activities to reduce overall project disturbance. This alternative was analyzed to determine the feasibility of locating the proposed ROW in an area with an existing BLM land use authorization and existing disturbance area.

In order to construct the road and conveyor belt in this area, it could potentially go two routes (Figure 5). The first potential route would follow the existing road and construct the proposed road and conveyor belt through Martin Marietta Materials' existing stockpile area and active mining activities to locate the proposed road and conveyor belt within existing disturbance areas and reduce project disturbance. However, this location would result in potential land use conflicts with the Martin Marietta Materials' mining activities because the road and conveyor belt would be constructed immediately adjacent to active mining activities and stockpiling thus limiting mining area and stockpiling for Martin Marietta Materials.

The second route could construct the road and conveyor belt north of the stockpile area and active mining activities to avoid conflicts with Martin Marietta Materials' existing activities. However, locating the road and conveyor belt north of active mining would also create potential land use conflicts by limiting Martin Marietta Materials' potential to further mine the area north of their existing activities as allowed by their existing BLM authorization. In addition, locating the proposed road and conveyor belt north of the active mining activities and stockpile area would necessitate an extensive cut area in order to get to the private land on APN 084-060-13 eliminating the primary goal of Alternative 4 which is to reduce disturbance area and grading volumes. This alternative was eliminated from detailed analysis because it would create land use conflicts with the existing Martin Marietta Materials authorized mining activities. In addition, an extensive cut area would still be required for this alternative.

3.0 RIGHT-OF-WAY LOCATION

A. LEGAL DESCRIPTION

The proposed road, conveyor belt and associated slopes associated with the proposed project would all be within the SE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 8, and the NW $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Section 16 of Township 19 North, Range 21 East, Mount Diablo Baseline and Meridian.

B. MAPS TIED TO SECTION CORNERS AND DRAWINGS

The location of the road, conveyor belt, and embankment slopes within the proposed ROW are shown on Figure 1 and Figure 2, with Figure 2 providing detail on the proposed ROW in relation to section corners.

C. ROAD CROSS SECTIONS, PLAN AND PROFILES

The current plan and profile for the road are shown on Figure 2, and the typical road cross sections are provided in Figure 3.

4.0 FACILITY DESIGN FACTORS

This section provides a description of the proposed project components (i.e., conveyor belt and access road) and the location and acres of ROW needed for construction and for operation of the proposed project.

A. MINIMUM AND MAXIMUM ENGINEERING STANDARDS

1) Construction Standards

The proposed access road would be exclusively for Granite's use and is not intended for public use. The road within the proposed ROW would be constructed and maintained to comply with Mine Safety and Health Administration (MSHA) standards. The proposed access road/conveyor belt disturbance area would measure approximately 33 feet long (measuring from the road center line) from property line to property line, 30 feet wide, with 15 feet for the road travel way, four feet for the conveyor belt, and 5.5 feet on each side of the road for the roads shoulder and drainage swales. The drainage swales would be constructed at a 2H:1V (horizontal to vertical) gradient with a 1.5 feet minimum depth. The slopes on each side of the road cut would be constructed at a 1.5 H:1V gradient (Figure 3).

2) Maximum Grade and Pitch

The grade of the proposed road along BLM administered land would be approximately 1.5 percent (Figure 2). The street crown grade would be approximately two percent (Figure 3).

3) Requirements and Location of Drainage Facilities

The proposed project would not require the construction of culverts, bridges, or low-water crossings. The majority of the proposed access road would be located on private property, and the portion of the proposed road on BLM administered land would be located at a high point of the overall access road which would minimize the potential for runoff entering the proposed ROW from other areas. No berms would be constructed because the road construction would all be within a cut area (Figure 2) and there would be no risk of roll-overs within the proposed ROW. Drainage swales would be constructed between the slopes and road shoulders (Figure 3) which would manage both uphill run-on and downhill run-off. Storm water run-off within the proposed ROW would be conveyed northeast within the drainage swales adjacent to the proposed road on private property owned by Lockwood Investments Company, Ltd. (APN 084-060-13).

4) Road Surfacing

The roadway would be surfaced with a minimum of four inches of Type 2 aggregate base compacted to 95 percent minimum density over compacted subgrade (Figure 3). Aggregate base required for road surfacing would be acquired from private property.

5) Length and Width of Road

The length and width of the proposed road and ROW are detailed in Section 2.0(C) and Section 4.0(A)(1) and are shown on Figure 2.

6) Cut and Fill Diagrams

Total cut volume for construction of the proposed road and conveyor belt within the proposed ROW would be 120,100 cubic yards with a maximum cut of 117 feet. A cut and fill diagram is shown in Figure 3. All cut material removed from the ROW would be transported to private property owned by Granite for reclamation of portions of Granite's Lockwood Facility.

B. DETAILED ENGINEERING PLANS AND SPECIFICATIONS FOR MAJOR STRUCTURES

No major structures are planned to be constructed.

C. TEMPORARY USE AREAS NEEDED

All work would be conducted within the proposed ROW and no temporary use areas would be needed.

5.0 ADDITIONAL COMPONENTS

A. EXISTING AND PROPOSED COMPONENTS ON AND OFF PUBLIC LAND

Proposed components on public land consist of a portion of the road, conveyor belt and embankment slopes as detailed in Section 2.0 and Section 4.0.

The largest portion of the proposed road and conveyor belt would be off of BLM administered public land and would be constructed on private property owned by Granite (APN 084-060-37) and Lockwood Investment Company, Ltd. (APN 084-060-13). Operations on private land have received approval with a Special Use Permit issued by Washoe County.

B. POSSIBLE FUTURE COMPONENTS ON AND OFF PUBLIC LAND

Future components on and off public land are the same as stated in Section 5.0(A).

C. IS THERE A NEED FOR SAND AND GRAVEL SUPPLIES FROM PUBLIC LAND

All sand and gravel supplies would be acquired from private property. There would be no need for sand and gravel to be supplied from public land.

D. LOCATION OF EQUIPMENT STORAGE AREAS

All equipment storage would occur on private land, either Granite's property (APN 084-060-37) or property owned by Lockwood Investments Company, Ltd. (APN 084-060-13).

6.0 GOVERNMENT AGENCIES INVOLVED

Government agencies that would be involved in this project include:

Table 1 Government Agency Approvals

Permit/Approval	Approving Agency
FEDERAL	
ROW Grant Authorization	BLM
National Environmental Policy Act Compliance to Grant ROW	BLM
WASHOE COUNTY	
Special Use Permit (Already Approved through Washoe County [SW04-020])	Washoe County
Air Quality Permit (Modification to Existing Permit)	Washoe County
Grading Permit	Washoe County
STATE OF NEVADA	
Construction Stormwater Permit (Modification to Existing Permit)	Nevada Division of Environmental Protection (NDEP), Bureau of Water Pollution Control

Note: Permits would be secured prior to construction.

There are not waters of the U.S., seeps, springs or wetlands located within the vicinity of the proposed ROW, so no U.S. Army Corps of Engineers Section 401 and/or 404 permits would be required to construct the proposed road and conveyor belt.

7.0 CONSTRUCTION OF FACILITIES

A. CONSTRUCTION

Major Facilities

The method of construction for the proposed road and conveyor belt would be conventional earth moving equipment for the purposes of excavation and embankment construction. Excavation would require approximately 120,100 cubic yards, or 180,150 tons (assuming the waste material weight is 1.5 ton per cubic yard) of material to be removed from within the proposed ROW. Granite would be responsible for all road and conveyor belt construction within the proposed ROW. Anticipated vehicle traffic during construction is detailed in Section 2(G).

Ancillary Facilities

Construction of ancillary facilities is not proposed.

Methods of Construction and Types of Equipment to be Used on the Road Right-of-Way

The method of construction for the proposed road and conveyor belt would be conventional earth moving equipment for the purposes of excavation and embankment. The equipment expected to be used for construction of the proposed road and conveyor belt within the proposed ROW would include one excavator, one bulldozer, one grader, one water truck, one compactor, two haul trucks and one pickup truck. During construction, a water truck would be utilized to control dust. Dust control additives may also be used.

B. WORK FORCE

It is anticipated that a work force would require at least one person per piece of equipment used plus one construction foreman. Assuming the list of potential equipment detailed in Section 7(A), the estimated work force within the proposed ROW during construction would be eight persons. Granite would be responsible for all road and conveyor belt construction within the proposed ROW.

C. FLAGGING OR STAKING THE RIGHT-OF-WAY

Site staking of the proposed ROW would include the following:

- ROW limits;
- Clearing limits;
- Road construction slope staking; and
- Finish grade stakes.

D. CLEARING AND GRADING

Clearing and grading would likely be performed using a grader and/or bulldozer. Material excavated from grading would be transported and loaded using excavators and haul trucks. All

excavated material would be transported to Granite's adjacent facility for reclamation purposes.

E. FACILITY CONSTRUCTION DATA

1) Description of Construction Process

Construction would proceed in the following order:

- Survey and construction staking;
- Clearing and grubbing;
- Excavation and embankment construction;
- Finished grading;
- Subgrade preparation and compaction;
- Road surfacing (aggregate base placement and compaction);
- Conveyor belt construction; and
- Seeding of slopes for erosion control.

F. ACCESS TO AND ALONG RIGHT-OF-WAY DURING CONSTRUCTION

The proposed ROW is adjacent to a parcel of private land owned by Granite (APN 084-060-37) Access to the proposed ROW would be from this private land parcel. No other access would be needed during construction, operations or maintenance.

G. CONTINGENCY PLANNING

1) Holder Contacts

Tina Mudd, Environmental Manager, 775-352-1935, tina.mudd@gcinc.com
 1900 Glendale Ave.
 P.O. Box 2087
 Sparks, NV 89431

Brian McClure, Materials Manger, 775-352-1957, brian.mcclure@gcinc.com
 1900 Glendale Ave.
 P.O. Box 2087
 Sparks, NV 89431

2) BLM Contacts

Shaina Shippen: 775-885-6110, sshippen@blm.gov
 BLM Carson City District Office
 5665 Morgan Mill Road
 Carson City, NV 89701

H. SAFETY REQUIREMENTS

All construction activities would comply with standard safety requirements set forth by MSHA. Construction activities would comply with federal, state and local statutes.

I. INDUSTRIAL WASTES AND TOXIC SUBSTANCES

The use of industrial wastes and toxic substances in the construction of the proposed road and conveyor belt would not be necessary. Construction activities would include normal use of gasoline and diesel fuel (i.e., hazardous materials) for operation of construction equipment. Granite would comply with applicable state and local statutes regarding the use and handling of hazardous materials (i.e. petroleum products). Granite would provide appropriate spill kits for any petroleum spills resulting from normal vehicle use. All fuel storage would occur on Granite's property which has a fully implemented spill prevention, control and countermeasure plan associated with the property. All hazardous materials (fuel/petroleum products) would be transported, used, stored, and disposed of in full compliance with applicable state, local and federal law. See Section 8(B)(2) for specific environmental protection measures regarding hazardous materials.

J. SEASONAL RESTRICTIONS ON VARIOUS ACTIVITIES

No seasonal restrictions for construction activities are anticipated. When specific compaction densities are required, material would not be placed and compacted during freezing temperatures because compaction requirements are difficult to meet in freezing temperatures.

8.0 RESOURCE VALUES AND ENVIRONMENTAL CONCERNS

A. LOCATION WITH REGARD TO EXISTING CORRIDORS

The proposed road and conveyor belt are not proposed within an existing road corridor, utility corridor, or other type of corridor.

B. ANTICIPATED CONFLICTS WITH RESOURCES OR PUBLIC HEALTH AND SAFETY

1) Air Quality

Construction equipment would generate combustion emissions, and construction activities would generate fugitive dust emissions. Construction activities would be short term and temporary. However, emissions and dust generation would occur over the life of the proposed use of the ROW. Granite's Lockwood Facility currently operates under a Washoe County Authority to Construct Permit. Depending on Washoe County's direction, Granite would either modify their existing Authority to Construct Permit to include the proposed operations, or they would submit a new Authority to Construct Permit to cover the proposed operations. Construction would comply with all the requirements of the Authority to Construct Permit.

To further minimize air quality impacts, Granite would implement the following environmental protection measures:

- Water would be applied to the ground during construction and utilization of disturbed areas, as necessary, to control fugitive dust emissions;
- A speed limit of 25 miles per hour (mph) would be used by project-related equipment on the proposed road to minimize the generation of fugitive airborne dust;
- Slopes would be seeded after construction to restore vegetation cover and prevent erosion; and
- All requirements of the Authority to Construct Permit issued by Washoe County would be adhered to, and any permits, or modifications to existing permits needed for construction activities would be obtained. Open burning of construction trash would not be permissible; and
- All equipment would be maintained to ensure proper function.

2) Noise

Construction equipment would generate mechanical and engine noise. All noise generated from equipment during construction of the road, conveyor belt and embankment slopes would be temporary, and would only last during construction activities. However, operation of the conveyor belt and travel on the road during operational activities would generate noise.

However, there are no known sensitive noise receptors in the vicinity. The nearest residential community is approximately 3,400 feet south of the proposed ROW and is south of I-80. The proposed project is not anticipated to result in noise impacts to the residential community south of I-80.

3) Geologic Hazards

There are no known geologic hazards in the proposed ROW area (NBMG, 1987). The proposed road and conveyor belt would not be anticipated to create any geologic hazards.

4) Geology, Mineral and Energy Resources

The proposed ROW would involve a small amount of disturbance on public land (approximately 1.8 acres) which would not lead to any structural instability within the surrounding area, and the small amount of waste material removal would not adversely impact the availability of material resources within the surrounding area. The proposed ROW would not be anticipated to have any impacts to geology, mineral and energy resources.

5) Paleontological Resources

The geologic unit mapped within the proposed ROW is Tw: Washington Hill Rhyolite. The Tw geologic unit is an igneous formation. The potential fossil yield classification for igneous formations is Class 1- Very Low (BLM, 2007). Thus, the probability for impacting any fossils or paleontological resources is unlikely. In the event that previously undiscovered paleontological resources are discovered in the performance of any surface disturbing activities, the item(s) or condition(s) would be left intact and immediately brought to the attention of the authorized officer of the BLM. If significant paleontological resources are found, avoidance, recordation, and data recovery would be required.

6) Soils & Surface Water Quality

Construction of the proposed road would require vegetation clearing and disturbance of soils. According to the Natural Resources Conservation Service Web Soil Survey, the soil type within the proposed ROW is classified as Skedaddle-Pahrangle-Lemm association (Map Unit 1550). It is considered hilly terrain with slopes of 15 percent to 70 percent. A typical soil profile consists of very stony loam, very cobbly sandy loam, cobbly clay loam, very gravelly coarse sandy loam, very gravelly loamy coarse sand, and bedrock. The soil type is considered well drained with a very low water storage capacity and a moderate to very high potential for run-off. The proposed ROW would remove approximately 1.8 acre of this soil association on public land.

Granite currently operates the Lockwood Facility under a Storm Water Pollution Prevention Plan (SWPPP) authorized by the State of Nevada's Storm Water General Permit NVR050000. As a result, Lockwood continues to maintain and improve storm water protections site wide. The road and conveyor area will be included in a SWPPP update and Storm Water best management practices (BMPs) will be incorporated and maintained. Currently a routine inspection and maintenance program is in place at Lockwood to ensure proper use and placement of BMPs.

These BMPs would be used to limit erosion and reduce sediment in precipitation runoff from the proposed ROW and disturbed areas during construction, operations, and initial stages of reclamation. BMPs would include but are not limited to measures outlined in the Truckee Meadows Construction Site BMP Handbook (Kennedy Jenks Consultants, 2008). BMPs used during construction and operation to minimize erosion and control sediment runoff would include, but are not limited to:

- Surface stabilization measures – dust control, mulching, riprap, temporary and permanent revegetation/reclamation, and placing growth media;
- Runoff control and conveyance measures – engineered channels, runoff diversions; and
- To reduce erosion in channels, swales or ditches caused by high flow velocities, installation of check dams would occur which would be constructed of rocks or gravel bags;
- Wherever possible, operations will preserve native vegetation on steep slopes;
- Operations will terrace slopes or track slopes where cuts are required and appropriate. Terracing and tracking slopes reduces erosion by creating stair-steps, furrows across slope and serration in the soil, decreasing the velocity of runoff, trapping sediments, increasing infiltration into the soil and aiding in the establishment of vegetation;
- Construction activities will be sequenced as to minimize exposure of un-stabilized soils to erosion by wind, rain and runoff. Construction activities will limit the amount of continuously connected disturbed soil areas;
- Fiber rolls, gravel bag barriers and silt fence will be used to control storm water runoff and limit erosion during construction activities;
- Inspection of site design features that are intended to block or filter storm water runoff would occur weekly during construction activities to ensure they are adequate to prevent sediment transport offsite.

The conveyor will be located adjacent to an access road which is required for maintenance and monitoring. Rock lined ditches with check dams will be used to divert flows to the settling ponds on private property (APN 084-060-13). The conveyor and road are designed to use existing drainage patterns, and the site will be graded to route the majority of flows onto private property (APN 084-060-13). Where existing drainage patterns cannot be used, flows will be routed along a rock lined ditch to settling ponds on private property (APN 084-060-13). Berms and swales will be used to keep flows on site and direct flows to the rock lined ditches where appropriate.

Revegetation of disturbed areas reduces the potential for wind and water erosion. Following construction activities, areas such as cut slopes and embankment slopes would be seeded as soon as practicable and safe. All sediment and erosion control measures would be inspected regularly, and maintenance/repairs performed, as needed. Excavated soils would be salvaged and reused for reclamation of aggregate pit facilities on adjacent private land.

7) Ground Water Quantity and Quality

The proposed ROW would not include water well drilling. All water necessary for project construction would come from existing permitted surface and ground water rights held by Granite, or through purchasing water from a local water hauling contractor. The proposed ROW would not have any impacts to ground water quantity or quality.

8) Vegetation, Invasive Species, and Noxious Weeds

Surface disturbance required for construction of the proposed road and conveyor belt would result in loss of existing vegetation within the proposed ROW. Areas of existing vegetation temporarily disturbed during construction would be reclaimed and reseeded, including road embankment slopes.

Removal of existing vegetation cover and exposure of bare soils from construction disturbance would increase the potential for colonization of invasive species and noxious weeds. A noxious weed survey would be completed prior to any surface disturbance required for construction. Areas of concern for noxious weed would be flagged by a qualified biologist to alert all personnel to avoid those areas, as practicable. Information and training regarding noxious weeds management and identification would be provided to all personnel affiliated with the implementation and maintenance of the proposed road and/or conveyor belt. All interim and final seed mixes for reclamation, and hay, straw, and hay/straw products used for erosion control would be certified weed-free for Nevada and BLM-identified noxious weeds and would be approved by the BLM botanist. All construction activities would comply with the BLM Carson City District Office Integrated Weed Management Plan (BLM, 2015b).

9) Wildlife

Wildlife habitat occurs within the proposed ROW and proposed construction and operations activities may conflict with species that potentially use habitat in the area. To minimize conflict and impacts, Granite would adhere to a speed limit of 25 mph when travelling on the road. Operators would be trained to monitor for the presence of larger wildlife such as deer and antelope that may cross the proposed road. If wildlife of any size is encountered while operating on the proposed road, vehicle operators would yield to the wildlife.

10) Threatened, Endangered and Sensitive Species

Impacts to threatened and endangered and BLM Sensitive Species are not anticipated. A biological baseline survey of the proposed 400 foot wide ROW area would be conducted prior to commencing operations to determine the presence of threatened, endangered and BLM sensitive species and/or their habitat for both wildlife and plants.

11) Nesting Migratory Birds

Vegetation cover within the proposed ROW may be suitable nesting habitat for numerous species of migratory birds. Construction-related surface disturbance would require vegetation

cover to be cleared within the proposed ROW. To minimize impacts to nesting migratory birds, construction surface disturbance on BLM-administered public land would be timed to occur outside the avian breeding season (March 1 to July 31) to the extent feasible. When habitat disturbance during the avian breeding season is unavoidable, a qualified biologist would survey the area prior to land clearing activities. If active nests are located, or if other evidence of nesting (i.e., mated pairs, territorial defense, carrying nesting material, transporting food) is observed, Granite's biologist would recommend to the BLM an avoidance buffer around the nest which the BLM, in coordination with the Nevada Department of Wildlife and the U.S. Fish and Wildlife Service, would review and approve prior to surface disturbance. Granite's biologist would inform Granite when the birds have left the nest. Granite would not conduct any surface disturbing activities within the exclusion zone until the biologist determines that the birds are no longer nesting.

12) Cultural Resources

Impacts to cultural resources (i.e., prehistoric and historic sites) would not be anticipated. Granite would conduct a cultural resource survey of the proposed 400 foot wide ROW area prior to commencing construction. Project construction personnel would be instructed on the proper protection of cultural resources. Avoidance is the BLM-preferred management response for preventing impacts to historic properties (a historic property is any prehistoric or historic site eligible to the National Register of Historic Places) or unevaluated cultural resources. If avoidance is not possible, or is not adequate to prevent adverse effects, Granite would undertake prescribed data recovery from such sites. Development of a treatment plan, data recovery, archeological documentation, and report preparation would be based on the Secretary of the Interior's "Standards and Guidelines for Archeology and Historic Preservation," 48 Code of Federal Regulations § 44716 (September 29, 1983), as amended or replaced. If an unevaluated site could not be avoided, additional information would be gathered and the site would be evaluated. If the site does not meet eligibility criteria, as defined by the Nevada State Historic Preservation Office, no further cultural work would be performed. If a site meets eligibility criteria, a data recovery plan or appropriate mitigation would be completed.

13) Visual Resources

The proposed conveyor belt and road may be visible from various locations in the surrounding vicinity. Visual contrast would be expected to be low because there are other existing roads and linear structures in the existing landscape.

14) BLM Projects

There are no known BLM projects within the proposed ROW. The proposed road and conveyor belt would not be anticipated to conflict with or impact BLM projects.

15) Recreation Activities

The proposed ROW does not contain any developed recreation sites or facilities. There are no unique attractions or features within the proposed ROW that may generate large numbers of

recreational users. However, the proposed ROW may be used for dispersed recreation activities, such as overland hiking or wildlife viewing. The proposed road and conveyor belt are not intended for public use and the public would be restricted from within the proposed ROW to protect public safety. Accordingly, recreational users would be displaced from the proposed ROW for the operational life of the road and conveyor belt.

16) Wilderness

There are no wilderness areas, wilderness study areas, or lands with wilderness characteristics within the proposed ROW. The proposed road and conveyor belt would not have any impacts on wilderness.

17) Areas of Critical Environmental Concern

There are no Areas of Critical Environmental Concern within or adjacent to the proposed ROW.

18) Native American Religious Concerns

Although the possibility of disturbing Native American gravesites within the proposed ROW is extremely low, inadvertent discovery and Native American Graves Protection and Repatriation Act procedures must be followed if any human remains or associated grave goods are disturbed. Under the Native American Graves Protection and Repatriation Act, section (3)(d)(1), it states that the discovering individual must notify the land manager in writing of such a discovery. If the discovery occurs in connection with an authorized use, the activity, which caused the discovery, is to cease and the materials are to be protected until the land manager can respond to the situation.

19) Grazing

The proposed ROW is located within the Spanish Springs/Mustang Allotment. Considering the relatively small size of surface disturbance proposed on public land (1.8 acres), there would be a negligible loss of Animal Unit Months or grazing capacity anticipated. If existing fences and gates are damaged or destroyed by construction activities, they would be repaired or replaced to their original condition, as required by the landowner or the land management agency. Temporary gates would be installed only with the permission of the landowner or the land management agency.

20) Wildland Fire

The proposed road and conveyor belt would not be anticipated to increase the potential for wildland fires. The following precautionary measures would be taken to prevent wildland fires:

- Wildland fires would be reported immediately to the BLM Central Nevada Interagency Dispatch Center (775-623-3444). To the extent known, Granite would include the location (latitude and longitude if possible), what is burning, the time the fire started, who/what is near the fire, and the direction of fire spread;

- List of emergency phone numbers would be available so that the appropriate firefighting agency can be contacted in case of a fire;
- All Granite vehicles would carry at a minimum a shovel and a conventional fire extinguisher;
- Vehicle catalytic converters on Granite vehicles that would enter and leave the proposed ROW on a regular basis would be inspected often and cleaned of all flammable debris;
- Personnel would be responsible for being aware of and complying with the requirements of any fire restrictions or closures issued by the BLM Carson City District Office, as publicized in the local media or posted at various sites throughout the field office district;
- All applicable state and federal fire laws and regulations would be complied with, and all reasonable measures would be taken to prevent and suppress fires; and
- Personnel would not be allowed to smoke within the proposed ROW.

21) Public Safety

Public safety would be maintained during all construction and maintenance activities. All project equipment would be operated and maintained in a functional, safe, and orderly manner. To protect public safety, all construction and maintenance activities would be conducted in conformance with applicable federal and state health and safety requirements.

The proposed ROW would contain the road and conveyor belt, neither of which is intended for public use. Accordingly, public access would be restricted from within the proposed ROW to protect public safety.

22) Solid and Hazardous Wastes

Granite would comply with all State of Nevada and local regulations regarding the storage and transportation of petroleum products. Spill kits would be stored onsite and/or in project equipment and vehicles during construction and maintenance activities, and would be made readily available to all personnel. Absorbent mats and pads would be immediately placed under any equipment observed to have a fluid leak to prevent possible ground contamination.

When practicable, equipment maintenance would be performed off site. In the event of oil, fuel, lubricating grease, or other equipment leaks, cleanup would be conducted as soon as possible. Any contaminated soil would be removed, managed, and disposed of at an off-site facility in compliance with state, local, and federal regulations. Spill kits would be stored onsite and/or in project equipment and vehicles during construction and maintenance activities, and would be made readily available to all personnel.

In accordance with state regulations, any spills would be reported to the NDEP if the material spilled exceeds the reportable quantity designated for that material. Per Nevada Administrative Code (NAC) 445A.347, the reportable quantity for petroleum products (e.g., gasoline, diesel,

motor oil, hydraulic fluid, etc.) is 25 gallons or any quantity if a petroleum spill occurs on or in waterways. Notification would be provided to the NDEP within one working day of the spill event via their Spill Reporting Hotline at 888-331-6337. A follow-up call to the BLM Sierra Front Field Office would be provided immediately afterwards.

All construction waste, including trash and litter, garbage or solid waste, biodegradable debris, petroleum products and other materials would be removed from BLM-administered public land to an authorized disposal facility. No wastes or surplus construction materials would be left on BLM-administered public land.

23) Land Use and Access

The proposed ROW complies with the Carson City District Consolidated Resource Management Plan (BLM, 2001) regarding ROW grant authorizations. This includes the National Policy Objective which states:

"It is the objective of the Secretary of the Interior to grant rights-of-way and temporary use permits, covered by the regulations in this part, to any qualified individual, business entity, or governmental entity and regulate, control and direct the use of said rights-of way on public land so as to:

- A. Protect the natural resources associated with the public lands and adjacent private property or other lands administered by a government agency.
- B. Prevent unnecessary or undue environmental damage to the lands and resources.
- C. Promote the utilization of rights-of way in common with respect to engineering and technological compatibility, national security and land use plans.
- D. Coordinate to the fullest extent possible, all actions taken pursuant to this part with state and local governments, interested individuals, and appropriate quasi-public entities."

In addition, the proposed project complies with standard operating procedures detailed within the Resource Management Plan (BLM, 2001), including:

- The right-of-way holder would use every reasonable means to minimize erosion and soil damage in connection with construction, rehabilitation or maintenance activities under a grant, including (but not limited to) construction of water bars, cross ditches, or other structures.
- Revegetation of disturbed land would be required as specified by the BLM. The appropriate seed mixture and proper planting techniques would be specified by the BLM.
- The right-of-way holder's activities in key fish and wildlife areas would be restricted by the BLM, if necessary, during periods of fish and wildlife breeding, nesting, spawning, lambing or calving activity.

- If the BLM deems necessary, a complete intensive cultural resources survey (BLM Class III) would be completed prior to issuance of a grant. Known or located cultural sites would be avoided within the corridors when locating roads, assembly areas and towers.
- The Holder would immediately bring to the attention of the authorized officer all antiquities or other objects of historic or scientific interest, including but not limited to historic or prehistoric ruins, fossils, or artifacts discovered as a result of operations under the grant and would leave such discoveries intact.

The proposed ROW is not within a BLM designated corridor. According to the BLM's Land and Mineral Legacy Rehost 2000 System (LR 2000), several authorized or pending land use authorization or ROWs occur within Township 19 North, Range 21 East, Sections 8 and 16. These authorizations include:

Table 2 Authorized and Pending ROWs within Project Vicinity per LR2000

Serial Number	Status	LR 2000 Authorization Classification
NVN 061040	Authorized	Community Pit
NVN 0054977	Authorized	Federal Aid Highways
NVN 053288	Authorized	Mineral Materials Sale
NVN 025627	Authorized	ROW-Communication Site, FLPMA
NVN 0044126	Authorized	ROW- Oil and Gas Pipelines
NVN 0042764	Authorized	ROW-Power Transmission Line
NVN 057376	Authorized	ROW-Power Transmission-FLPMA
NVN 078423	Authorized	ROW-Roads
NVN 037434	Authorized	ROW-Roads Federal
NVCC 0020776	Authorized	ROW-Telephone and Telegraph, FLPMA
NVCC 0021089	Authorized	ROW-Telephone and Telegraph, FLPMA
NVN 065550	Authorized	ROW-Telephone and Telegraph, FLPMA
NVN 087359	Authorized	ROW-Telephone & Telegraph, FLPMA
NVN 002370	Authorized	ROW-Telephone-Telegraph-43USC961
NVN 0043254	Authorized	Rail Road and Stations Outside Alaska
NVN 066363	Authorized	Withdrawal-BLM Miscellaneous
NVN 0044542	Authorized	Withdrawal-Federal Aviation Administration
NVN 0051770	Authorized	Withdrawal-Federal Aviation Administration
NVN 093904	Pending	Mineral Material Exploration Permit
NVN 076798	Pending	Sale-Public Lands-FLPMA
NVN 076799	Pending	Sale-Public Lands-FLPMA
NVN 069612	Pending	Surface Management-Plan

Source: LR 2000 (BLM, 2015a)

This proposed ROW is not anticipated to impact access to or use of the above authorized or pending ROWs and land use authorizations. If conflicts with existing authorizations occur, Granite would work with the BLM and the affected ROW/permit holder to resolve any conflicts or issues resulting from the proposed ROW.

24) Environmental Justice

The proposed ROW is not anticipated to disproportionately affect minority or low-income populations within the surrounding area.

25) Wild Horses and Burros

The proposed ROW is not within an active Herd Management Area for wild horses and burros.

26) Social Values and Economics

The proposed ROW is located within unincorporated Washoe County. The primary businesses adjacent to the proposed ROW are industrial uses, including aggregate extraction activities. The closest residential community in the vicinity of the proposed ROW (approximately 3,400 feet south) is located south of I-80, and is within Storey County. The proposed ROW is not expected to result in noticeable changes to Washoe County expenditures or revenues. The proposed ROW is not expected to result in a noticeable change to employment within Washoe County or Storey County, nor is it expected to increase the demand for additional public or private services (e.g., law enforcement, emergency response, fire protection, health care and social services, water, and solid waste, public schools) and it would not impact the demand or availability of permanent housing within Washoe County or Storey County. The proposed project is not anticipated to have noticeable impacts on social values or economics within Washoe County or Storey County.

9.0 STABILIZATION AND REHABILITATION

A. SOIL REPLACEMENT AND STABILIZATION

After construction of the road improvements, all embankment slopes constructed would be seeded with a weed-free seed mix approved by the BLM. The roadway would be stabilized with aggregate base and water run-on and run-off would be controlled with drainage swales adjacent to the road shoulder. Soils removed during construction would be used for reclamation of surface disturbance on private land owned by Granite Construction southwest of the proposed ROW. None of the cut material removed from the site would be stored within the ROW for future reclamation purposes. Reclamation measures would comply with the conditions set forth in the Special Use Permits approved by Washoe County (SPW1-5-94 and SW04-020). The Special Use Permits include a Mine Plan and Reclamation Plan. This proposed project would comply with the reclamation measures set forth in the Mine Plan and Reclamation Plan on file with Washoe County. Reclamation measures would include but are not limited to:

- All disturbed land shall be contoured and seeded no later than the month of March in the spring or the month of November in the fall. Revegetation will include the use of a jute erosion control blanket under the seed mix or other approved method of soil stabilization to be used in conjunction with the reseeding to promote growth and soil stabilization.
- Finished slope faces shall be contoured to have a natural appearance by varying the topography both horizontally and vertically; no flat-slope faces or planes intersecting at 90-degree angles would occur.
- All slopes created by the road and conveyor construction shall be immediately stabilized and reseeded.

B. DISPOSAL OF VEGETATION REMOVED DURING CONSTRUCTION

Any vegetation removed during construction would be used to stabilize the road embankment slopes within the proposed ROW.

C. SEEDING SPECIFICATIONS

The seed mix used for revegetation would be approved by the BLM and all seeds would have a minimum pure live seed. The vegetation mixture would not include any seed specifically prohibited or restricted by NAC 587.173 and NAC 587.175. The vegetation mixture would not include any vegetation considered to be a noxious weed by NAC 555.010. Seeding procedures would be dependent upon site characteristics. The most likely method would be broadcast seeding. Broadcast seed would be covered by harrowing or raking to ensure germination and establishment. Seed application would not occur during windy days. Seed application would

occur in late fall or early winter. Revegetation would be considered a success when vegetation cover is restored to, or in excess of the existing pre-disturbance vegetation cover.

D. FERTILIZER

No fertilizer would be used for the proposed project, including for any stabilization and rehabilitation activities.

E. LIMITING ACCESS TO THE RIGHT-OF-WAY

The proposed road embankment slopes would be graded to a 1.5H:1V gradient. Slopes of this grade would be anticipated to prevent most public access. Additionally, the proposed road would begin and end at private aggregate mining facilities where public access is restricted. Mining activities also occur southeast of the proposed ROW, which would further prevent public access in the vicinity.

10.0 OPERATION AND MAINTENANCE

A. MINIMUM MAINTENANCE AND MAINTENANCE SCHEDULE

General maintenance of road and conveyor belt within the proposed ROW would be performed by Granite. Daily inspections would be made during work days. If the road is inactive for any period of time, it would be inspected prior to use. Water trucks would be used to control dust within the proposed ROW during operation and maintenance activities.

B. PLACEMENT OF CONTROL, WARNING, AND DIRECTIONAL TRAFFIC SIGNS

Control, warning, and directional traffic signs would not be necessary because public access to the proposed ROW would be restricted by the steep constructed slopes adjacent to the proposed road and the proposed ROW's location to existing gravel mining activities on private and public land. No control, warning or directional signs are proposed.

C. MAINTENANCE OF SPECIAL NEEDS SUCH AS SNOW REMOVAL, SEASONAL CLOSURE, AND CONTROLLED ACCESS

Equipment that would be used for maintenance work and snow removal would include, but is not limited to graders and bulldozers. Seasonal closures would not be anticipated. Granite would inform the BLM immediately if maintenance or repair activities within the proposed ROW would involve excavation or extensive surface disturbance.

D. SAFETY

All operation and maintenance activities would comply with standard safety requirements set forth by MSHA, as well as federal, state and local statutes.

E. INDUSTRIAL WASTES AND TOXIC SUBSTANCES

No industrial wastes and toxic substances would be used during operation and maintenance of the road or conveyor belt. Operation and maintenance activities would include normal use of gasoline and diesel fuel for operation of construction equipment. Granite would provide appropriate spill kits for any petroleum spills resulting from normal vehicle use. All fuel storage would occur on Granite's private property which has a fully implemented spill prevention, control and countermeasure plan. All hazardous materials (i.e., fuel/petroleum products) would be transported, used, stored, and disposed of in full compliance with applicable state, local and federal law. See the environmental protection measures detailed in Section 8(B)(22) regarding solid and hazardous waste.

F. INSPECTION AND MAINTENANCE SCHEDULES

The proposed road and conveyor belt would be maintained continuously as needed. Daily inspections would be made during work days. If the road or conveyor belt is inactive for any period of time, they would be inspected prior to use.

G. WORK SCHEDULES

Operation and maintenance activities would likely occur during daylight hours, but may extend up to 24 hours, seven days per week. In the event of damage to the road or conveyor belt, the length of time needed for Granite to make the repairs would depend on the extent of the damage.

H. FIRE CONTROL

The environmental protection measures that would be implemented during operation and maintenance activities, as well as construction activities to control fire are listed in Section 8 (B)(20) of this POD.

I. INSPECTIONS

During operations, MSHA has authority for regular site wide inspections that would include the operation and maintenance of the proposed road and conveyor belt.

J. CONTINGENCY PLANNING

See Sections 7(G)(1) and 7(G)(2) for a list of contacts for contingency planning purposes.

11.0 TERMINATION AND RESTORATION ACTIVITIES

A. DETERMINE IF THE ROAD WILL BE TOTALLY OBLITERATED

At the completion of operations the proposed road and conveyor belt would be removed. The road surface would be ripped and seeded.

B. WHAT STRUCTURES WILL BE LEFT IN PLACE OR REMOVED

At the completion of operations the proposed road and conveyor belt would be removed. No structures would be left or abandoned in place. Embankment slopes would remain, but would be seeded.

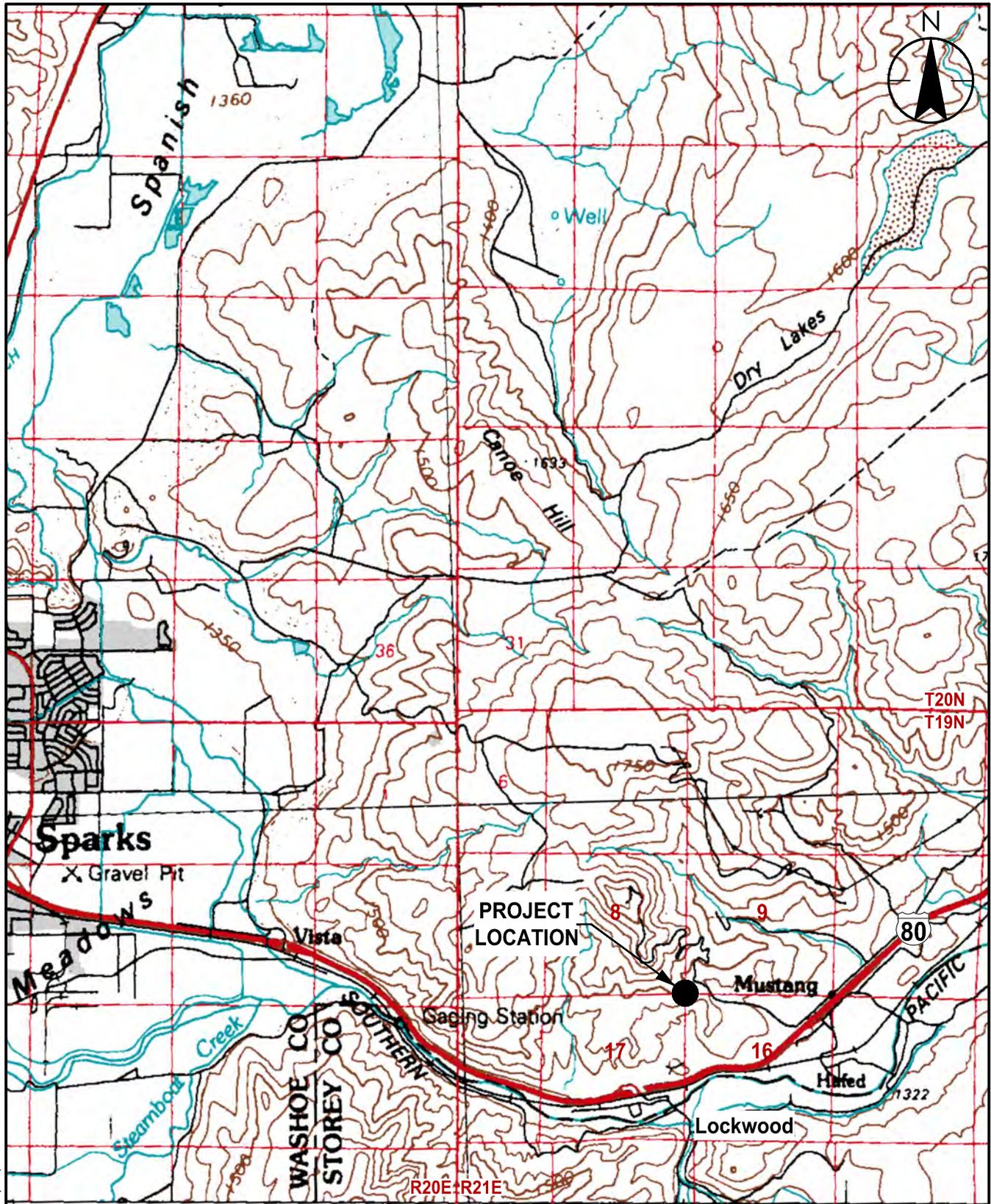
C. STABILIZATION AND RE-VEGETATION OF DISTURBED AREA

The roadway would be ripped and seeded. The seed mix would be approved by the BLM and certified weed free. Seeding procedures would be dependent upon site characteristics. The most likely method would be broadcast seeding. Broadcast seed would be covered by harrowing or raking to ensure germination and establishment. Seed application would not occur during windy days. Seed application would occur in late fall or early winter. During restoration, soil disturbance would be minimized and limited to the areas that require ripping and seeding treatments.

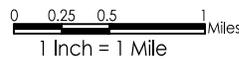
12.0 REFERENCES

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Client/Project

GRANITE CONSTRUCTION COMPANY
 PROPOSED ACCESS ROAD AND
 CONVEYOR BELT

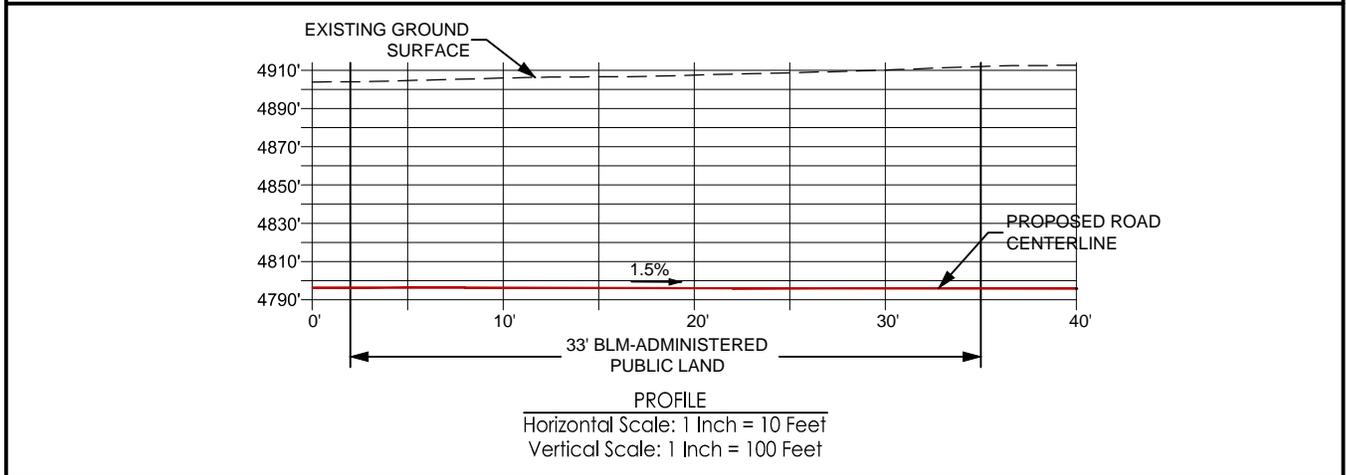
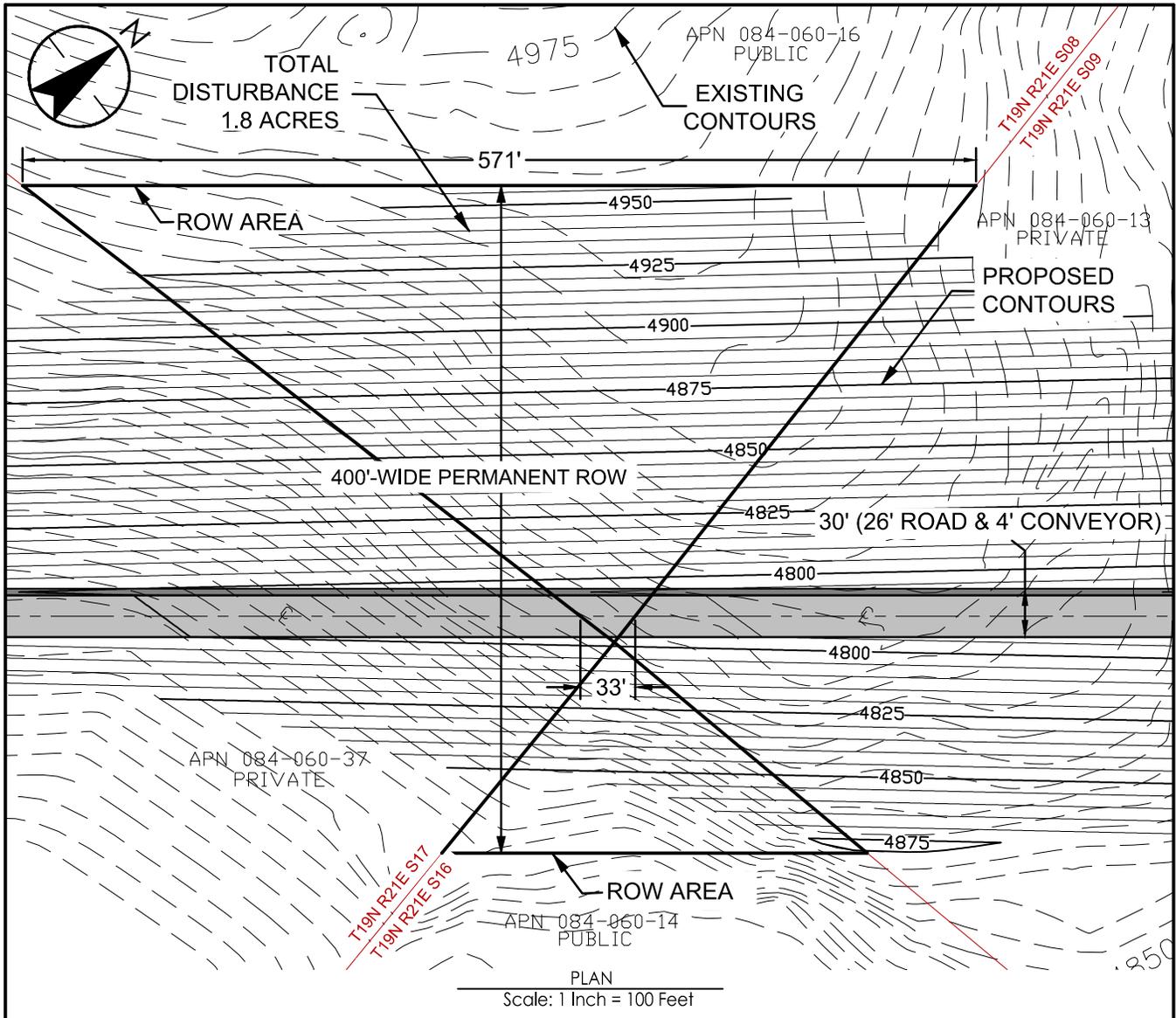
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Title

PROJECT LOCATION MAP

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GRANITE CONSTRUCTION COMPANY
PROPOSED ACCESS ROAD AND
CONVEYOR BELT

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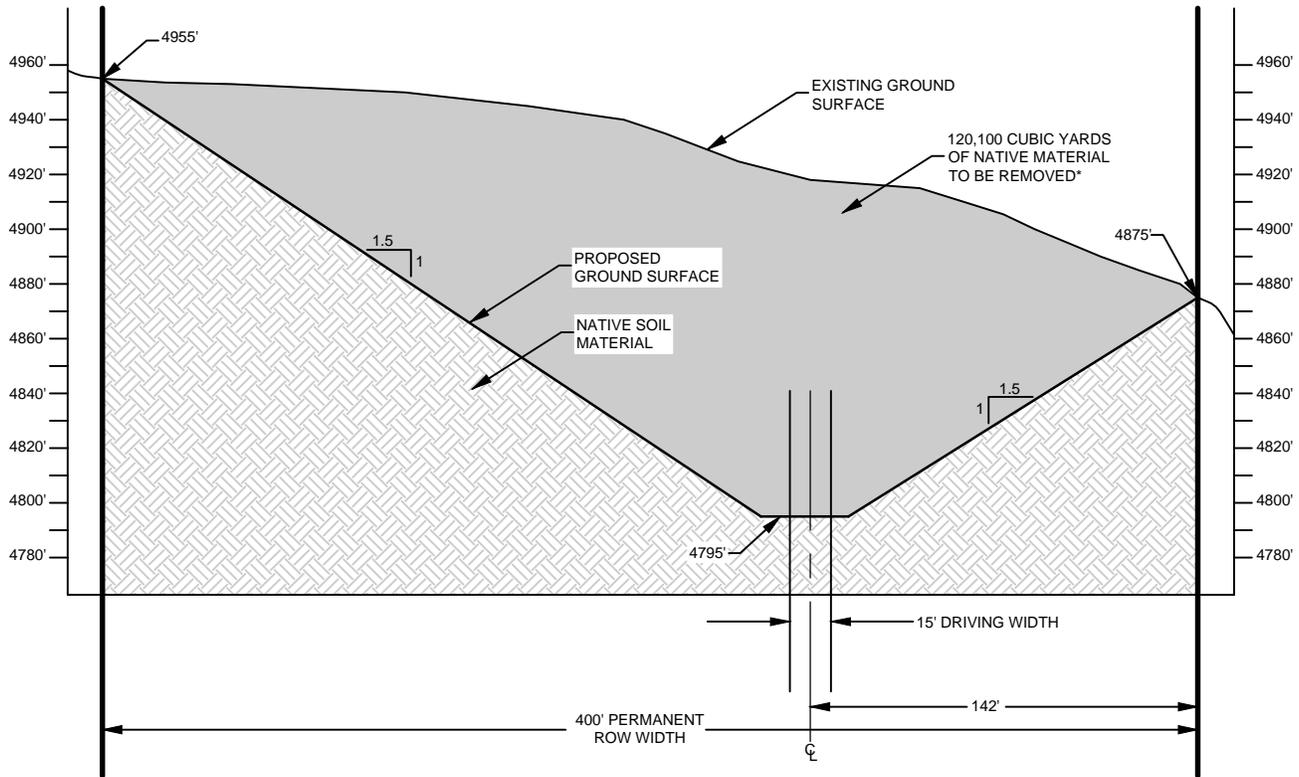
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CONSTRUCTION PLAN AND PROFILE

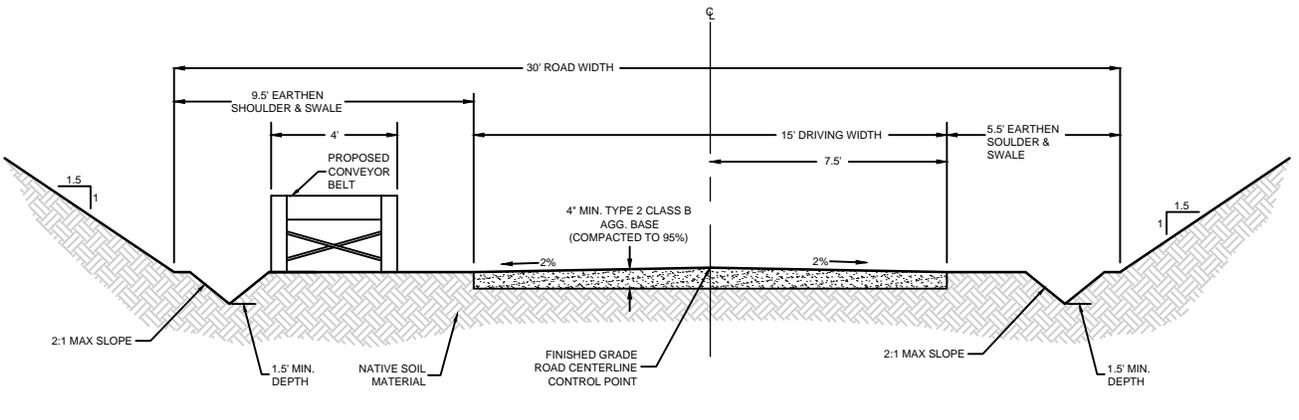
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*ALL REMOVED MATERIAL WILL BE USED FOR RECLAMATION ACTIVITIES ON THE EXISTING LOCKWOOD FACILITY.

ROAD CUT - TYPICAL SECTION
 Not to Scale



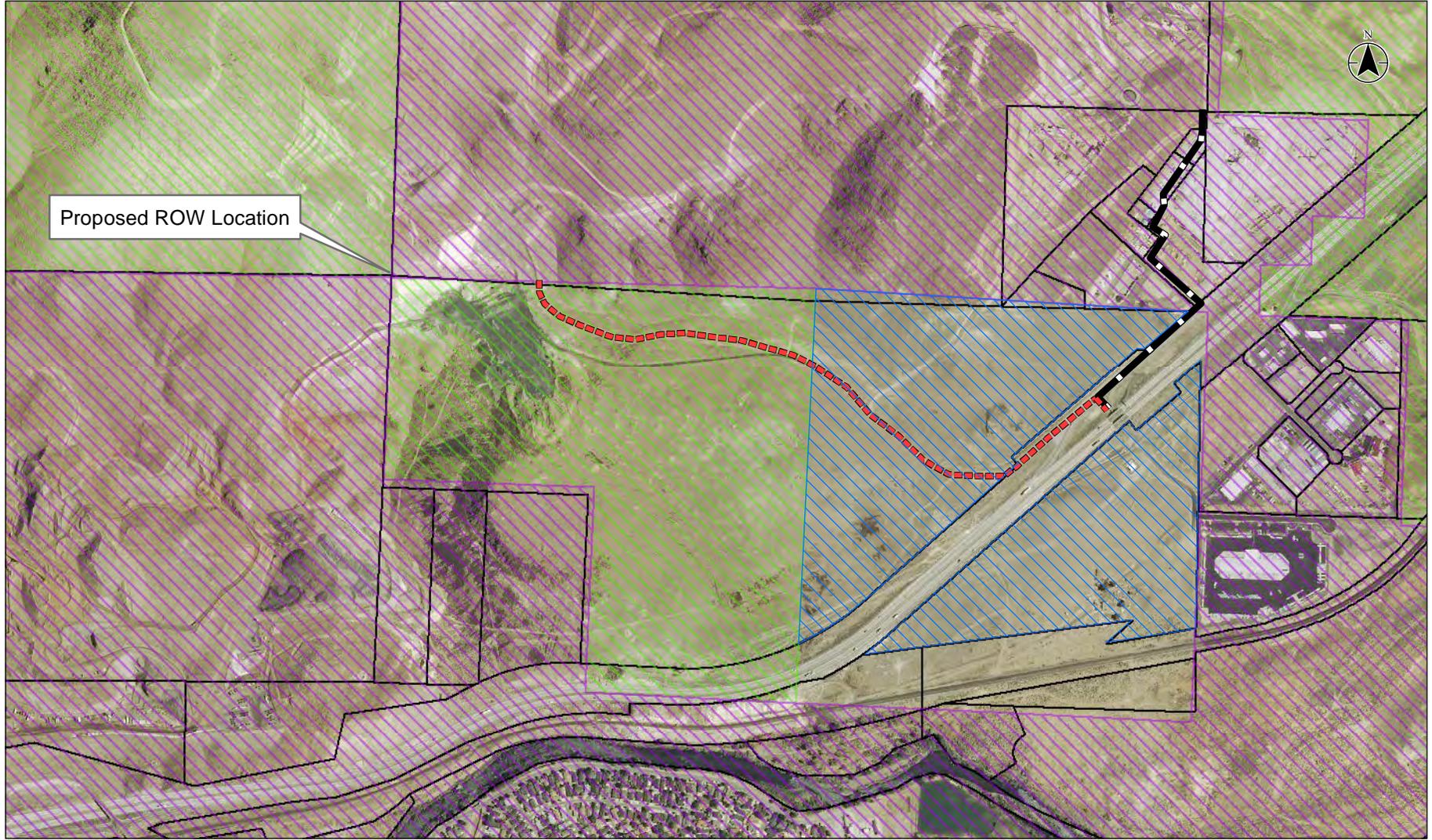
ACCESS ROAD AND CONVEYOR BELT - TYPICAL SECTION
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 3
 Title
 TYPICAL CROSS SECTIONS

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Proposed ROW Location



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LEGEND

- ALTERNATIVE 2
- ALTERNATIVE 3
- LAND ADMINISTRATION/OWNERSHIP**
- BUREAU OF LAND MANAGEMENT
- BUREAU OF RECLAMATION
- PRIVATE LAND

0 500 1,000 Feet
 1 inch = 1,000 feet

Notes
 1. NAD 1983 UTM Zone 11 Nitraverse Mercator
 2. NAIP Imagery-Nevada_2013_1m

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 PROPOSED ACCESS ROAD AND
 CONVEYOR BELT

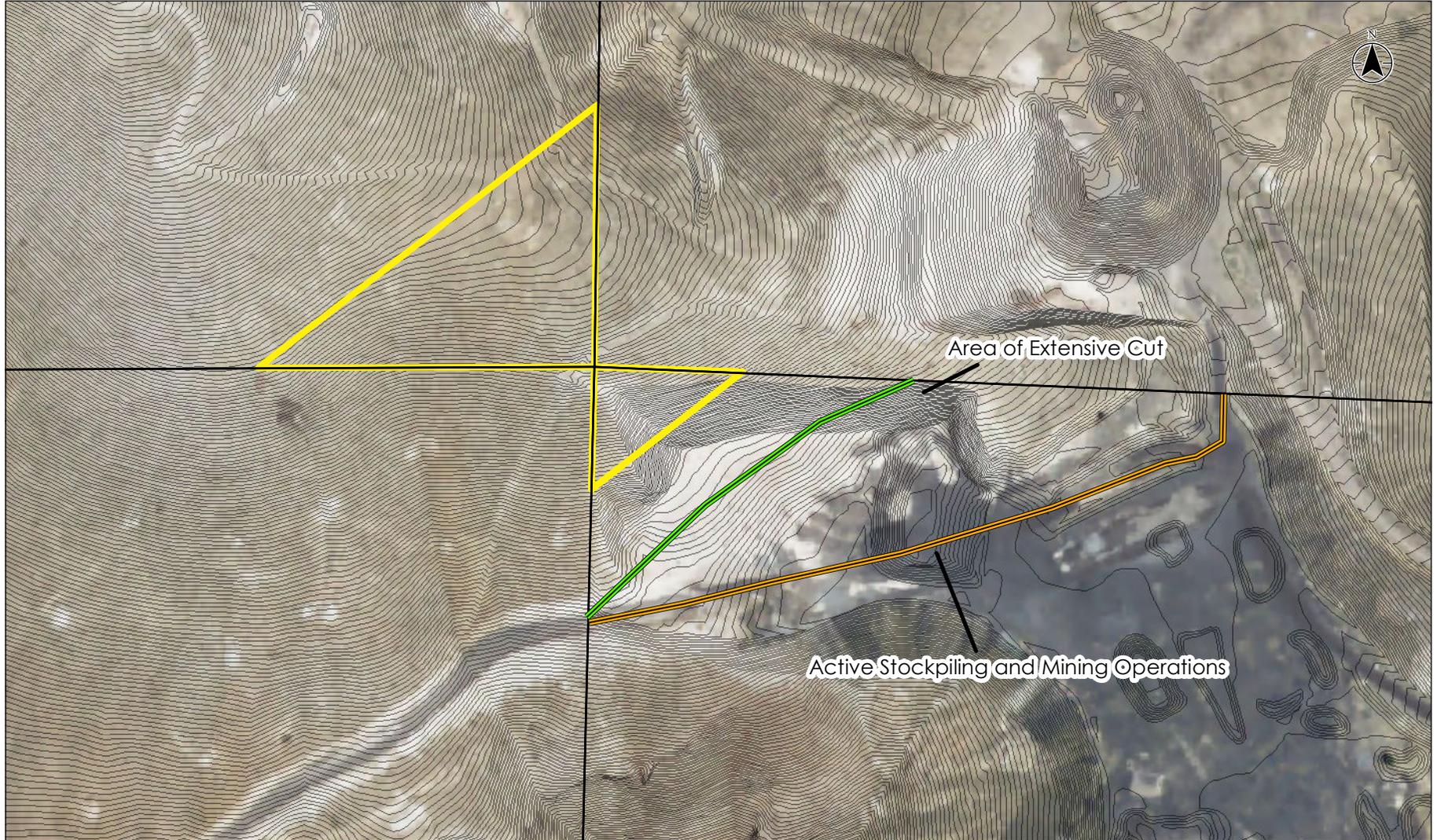
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 ALTERNATIVES CONSIDERED BUT
 ELIMINATED FROM DETAILED ANALYSIS

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-  Alternative 4 Route 1
-  Alternative 4 Route 2
-  Proposed ROW
-  2-Foot Countours



1 inch = 200 feet

- Notes
1. NAD 1983 UTM Zone 11 N Transverse Mercator
 2. NAIP Imagery-Nevada, 2015_1m

Client/Project
 GRANITE CONSTRUCTION COMPANY
 PROPOSED ACCESS ROAD AND
 CONVEYOR BELT

Figure No.
 5

Title
 ALTERNATIVES CONSIDERED BUT
 ELIMINATED FROM DETAILED ANALYSIS

Drawn: October 28, 2015
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