



Working with Communities to Protect Their Land Air and Water

85 Keystone Ave., Suite I, Reno, NV 89503
775-348-1986, www.gbrw.org

12/12/2012

Great Basin Resource Watch comments to Nevada Mining Oversight and Accountability Commission

John Hadder, Director

Good morning Commissioners and thank you for taking time for public comment. Great Basin Resource Watch (GBRW) appreciates the Commission's consideration of pit lakes in Nevada, and the concerns we raised at the last meeting of this Commission. At the end of our presentation we had these requests of the Commission:

- The Commission recommend to the Nevada Legislature that state statutes be modified or created to require a beneficial use for all current and future pit lakes.
- We also request that the Commission direct the NDEP work with the mining industry to develop a reclamation cost estimate of compliance for recreational postmining pit lake use and report on finding by the next meeting of the Commission.
- We further propose that the Lone Tree pit lake be used as the sample for this estimate. The Lone Tree pit lake will be quite large, it does pose representative challenges in terms of public access, it has had acid and toxicity problems requiring treatment, and its near the Humboldt River. Using the Lone Tree pit lake should serve as a conservative example.

We would like to know if the Commission has considered these requests. If so, we ask the Commission to address these requests at the next regular meeting. If not, when can we expect the Commission to consider these requests?

GBRW continues to support the resolution SJR 15 that will be before the legislative again in the 2013 legislative session. The mining industry should not be given special tax status and the legislature should be allowed to develop a just and fair taxation scheme for the mining industry, which appears to be the will of the public.

In closing we have another request of the Commission. For over two years people living in the Historic Comstock have been trying to protect the Historical Heritage of the Comstock and preserve the unique "rural residential" lifestyle of the area. The issue of modern large-scale mining in more residential areas needs to be addressed, and GBRW asks that the Commission place item on the next agenda to discuss the remaining of the Comstock and the Historical Heritage that maybe at stake. On the agenda we suggest that the Comstock Residence Association be asked to present their perspective and in fairness we expect that the Commission will also wish to hear from the Comstock Mining Inc.

Not only is the Comstock of historical significance, but it is also intermingled with the Carson River Mercury Superfund Site, a legacy of the historic mining period, which complicates modern mining in that area as well. Therefore, we further suggest that the U.S. EPA and the state of Nevada be invited to present the current understanding of contamination and process forward to clean-up of the Superfund site.

Great Basin Resource Watch as always is open to assisting the Commission in any way to motivate actions on these issues.

Sincerely,

A handwritten signature in black ink that reads "John Hadder". The signature is written in a cursive, flowing style with a large initial "J" and a long, sweeping underline.

John Hadder, Director