



Working with Communities to Protect Their Land Air and Water

P.O. Box 207, Reno, NV 89504
775-348-1986, www.gbrw.org

June 13, 2014

Whitney Wirthlin
Bureau of Land Management
Wells Field Office Geologist
3900 E. Idaho Street
Elko, NV 89801

Re: Comments on the Long Canyon Mine Project Draft Environmental Impact Statement

Dear Ms. Wirthlin,

Great Basin Resource Watch (GBRW) apologies for the tardiness of these comments; however, there was a error in the mail forwarding process, which prevented GBRW from receiving notice of the draft EIS in a timely manner. Since the date is late our comments here are brief and focus on our key concerns only. Please review and accept.

GBRW supports the North Facilities alternative as the preferred action over the proposed action. We appreciate the effort to develop this alternative in light of our and others comments during scoping.

Wildlife

Mule deer and other similar species will be significantly impacted by the Long Canyon Mine. The draft EIS does discuss many of the impacts and it seems likely that the migration routes will be disrupted during construction and mining operations with potentially significant impacts to the area herds. The springs and surrounding environs serve many species including the mule deer and are likely to be diminished as a resource and combined with mere activity of the mining operations is likely to negatively impact wildlife use of the springs in general.

The North Facilities alternative appears to be a much better option in reducing potential impacts to wildlife. GBRW still questions whether mule deer and other similar migratory animals will use the wider corridor between the open pit and waste rock dump. There will be constant noise light at night and vehicular traffic. GBRW suggests that this be studied to see if deer actually do use this corridor.

It is well known that sage-grouse have very strong site fidelity,¹ so once the sage-grouse are displaced by resource extraction it is potentially a permanent loss to sage-grouse populations even with reclamation. The first two sage-grouse conservation options stated in the COT report:²

- “1. Avoid new mining activities and/or any associated facilities within occupied habitats, including seasonal habitats;
2. Avoid leasing in sage-grouse habitats until other suitable habitats can be restored to habitats used by sage-grouse;”

Great Basin Resource Watch is a tax-exempt (501(c)3) organization

MOAC DATE 6-26-14
PRESENTED DURING PUBLIC COMMENT
Exhibit Number GBRW
Page 1 of 5

Numerous studies show that sage-grouse populations are effected as far as 4 miles or greater from the actual disturbance. The noise, dust, and constant activity of resource extraction (most operations are 24/7) deters sage-grouse habitation far from the actual operations. As noted in the NTT report, "Impacts as measured by the number of males attending leks are most severe near the lek, remain discernable out to >4 miles, and often result in lek expirations."³ The NTT report goes on to conclude that, " Even if this approach were to be continued [establishing a No Surface Occupancy, NSO, buffer around leks], it should be noted that protecting even 75 to >80% of nesting hens would require a 4-mile radius buffer (Table 1). Even a 4-miles NSO buffer would not be large enough to offset all the impacts reviewed above."⁴

Thus, even the North Facilities Alternative is unlikely to prevent significant impacts to sage-grouse in the region. It is entirely possible if not likely that nearby leks will be abandoned resulting in a permanent impact to sage-grouse populations.

Overall, GBRW views the North Facilities Alternative as a general reduction in impacts to wildlife but still fall short of preventing significant impacts to wildlife and sensitive species in the area. Continued study of wildlife in the area, especially sensitive species, is essential here to determine the impacts to wildlife and whether mitigation measures are effective or need to revised and other measures implemented.

Wilderness Character

GBRW remains concerned about the impact of the open pit to the viewshed, and the EIS should contain an alternative for backfilling of the open pit. According to the analysis mentioned but not presented in the draft EIS back filling options are not economically feasible. However, the draft EIS failed to analyze the potential impediment that the remaining open pit would pose to future wilderness designation. Lands currently determined by BLM as having wilderness character along the eastern side of the North Pequops are more likely to be passed over for wilderness designation due to the long-term visual disturbance of the open pit. GBRW requests that the BLM examine this long-term impact from the project in the final EIS.

Figure 3.10-1 in the draft EIS (Wilderness Resources) outlines a significantly different area of overlap between the lands with wilderness characteristics (LWC) than the map provided during scoping (see Figure 1). It appears that if the map used during scoping, which appears to be the CESA for wilderness resources in the draft EIS, were used a considerably larger area of LWC would be impacted directly, overlapping the project boundary. BLM needs to explain this difference in the final EIS. Assuming the map provided during scoping is correct then BLM should reevaluate direct impacts to wilderness character.

The North Facilities alternative will still significantly impact the wilderness character of the area. The DEIS states that, "Opportunities for solitude and for primitive and unconfined recreation, which is a defining criteria of lands with wilderness characteristics (BLM, 2012c), would be diminished as a result of the restricted access to the approximately 308 acres of lands with wilderness characteristics that are in the project area." (pg. 4-112). However, there are no mitigation procedures indicated. A baseline of the ambient light and sound should be developed prior to project commencement, and procedures emplaced to decrease overall sound and ambient light towards that baseline. GBRW recommends that BLM include an analysis in the EIS of the use of sound dampening controls on any motorized vehicle and enclosed mine

operations. The use of downward directed light fixtures whenever possible to minimize ambient light should be included in the EIS as well.

In the cumulative impacts analysis the draft EIS states. "Impacts associated with increased noise from the Proposed Action would not be audible from the entire CESA, only areas close to the operations." (pg. 5-65). The phrase "close to the operations" is vague and GBRW recommends that BLM have a noise analysis done to determine how far away from the operations from various locations would be needed to not hear the operations and thus not impact the wilderness character. There are numerous existing operations in Nevada that could be used as representative mines to gather noise data and estimate the impact for the North Pequop area.

GBRW remains concerned that on the whole the Long Canyon Project with the other existing and likely explorations in the North Pequops will serious undermine the wilderness character of the region and make this area unavailable for future wilderness designation. GBRW does not agree with the BLM's final assessment that "cumulative impacts from the Proposed Action (North Facilities Alternative) would be minor within the CESA." GBRW strongly requests that BLM reexamine this issue

If you have any questions regarding any of our comments feel free to contact us.

Sincerely,



John Hadder
Director

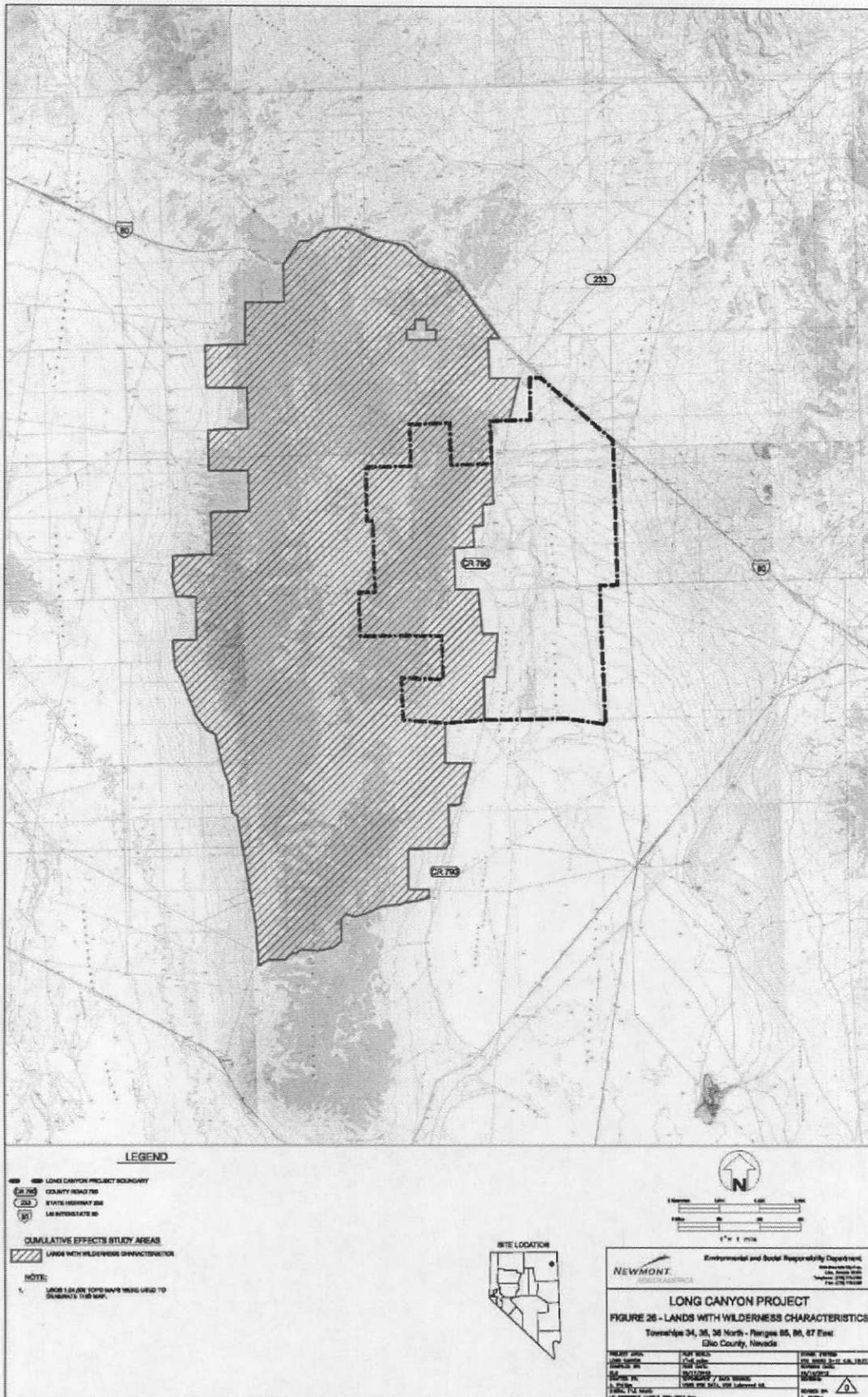


Figure 1 – Lands with Wilderness Characteristics from the scoping informational materials.

MOAC DATE 6-26-14
 PRESENTED DURING PUBLIC COMMENT
 Exhibit Number GBRW
 Page 4 of 5

¹ Connelly, J.W., S.T. Knick, M.A. Schroeder, and S.J. Stiver. 2004. Conservation assessment of greater sage-grouse and sagebrush habitats. Unpublished Report, Western Association of fish and Wildlife Agencies. Cheyene, WY. 610 pp.

Connelly, J.W., C.A. Hagen, and M.A. Schroeder. 2011. Characteristics and dynamics of greater sage-grouse populations. pp. 53-68 in S.T. Knick and J.W. Connelly, editors. Greater sage-grouse: ecology and conservation of a landscape species and its habitats. Studies in Avian Biology vol. 38. University of California Press, Berkeley, California, USA.

² U.S. Fish and Wildlife Service. 2013. Greater Sage-grouse (*Centrocercus urophasianus*) Conservation Objectives: Final Report. U.S. Fish and Wildlife Service, Denver, CO. February 2013. pg. 49.

³ NTT(National Technical Team). 2011. A Report on National Greater Sage-Grouse Conservation Measures. Produced by the Sage-Grouse National technical Team. Washington D.C. December 21, 2011. (pg. 20)

⁴ NTT, 2011, pp. 20-21.