



Working with Communities to Protect Their Land Air and Water

P.O. Box 207 Reno, NV 89504

775-348-1986, www.gbrw.org

July 25, 2016

Ely District, Egan Field Office
Atten: Stephanie Trujillo, Ely District Project Lead
U.S. Bureau of Land Management
702 North Industrial Way
Ely, NV 89301

Re: *Final Environmental Impact Statement (DEIS) for the Barrick Gold U.S Inc. proposed Bald Mountain Mine North and South Operations Area Projects*

Dear Ms Trujillo,

Great Basin Resource Watch (GBRW) remains very concerned with the cumulative impacts of the Bald Mountain mine. The footprint of the Bald Mountain mine is very significant and the expansion of the mine and its exploration fingers is a region-wide impact. Therefore, GBRW supports the No Action alternative, and the next best option is the West Redbird Modification Alternative.

Comment Response Document

GBRW found the response to comments section of the EIS to be less transparent and useful than it should be. All of the comment letter should be reproduced in their entirety, so the public can see the full context of the comments. In many cases it was difficult to fully grasp the sense of a comment with the surrounding context. It looks like there was an attempt to organize comments by topics, but there still seemed to be similar topics spread out throughout the response document. There were some comments that were indicated as “multiple.” BLM need to include the number of these “multiple comments, “ to give the public a full sense of how many people supported on position or another.

General comments

Overall, GBRW remains concerned about the affects to water, wildlife (particularly the mule deer migration routes and sage grouse), cultural sites, and viewshed. Although some of our comments were addressed in the response document we include our draft EIS comments here again for the record, since many of our concerns remain. We note many comments of concern over how this mine affects wildlife and water resources.

We note the BLM’s response to GBRW’s comment,

“Sage grouse protection hinges on the memo of understanding (MOU) signed in 2013 between United States Department of Interior Bureau of Land Management-Nevada State Office, United States Department of Agriculture, United States Forest Service, Humboldt-Toiyabe National Forest, Nevada Department of Conservation and Natural Resources, and Barrick Gold of North America, Newmont Mining Corporation, and

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

Other Companies. However, according to the MOU (DEIS, p. I-8, xi) any party may terminate its involvement with 30 day written notice. Thus, assured long-term protection of sage grouse does not exist. Furthermore, the agreement is binding upon Barrick and its Companies, but not future owners of the mine operations, which may occur in the near future. “

BLM Response:

“Comment noted. The MOU has been superseded by the September 2015 Land Use Plan Amendment. The BLM continues to coordinate closely with NDOW and the applicant to ensure the implementation of feasible conservation measures that protect and enhance the sustainability of wildlife resources within the project area and vicinity. The BLM will require terms of any approval to be applicable to the buyer of the Bald Mountain Mine property, Kinross Gold.”

Our interpretation of this response is that indeed the protections in the MOU may or not exist, since the sage grouse conservation plan appears not to be an interagency process that the general public may not be apprised of. It appears as though Appendix A may fulfill the requirement that we suggest here. The FEIS and ROD must contain the specifics of the sage grouse protection plan as it relates to this mine project.

GBRW notes that BLM added a fugitive mercury emission analysis. In the response to comments BLM states”

“Text of Section 3.14.2 is revised and includes estimated fugitive and point source mercury emissions from the mine property, calculation of mercury deposition rates in the three adjacent watersheds, and a comparison of those deposition rates to "global background" (e.g., caused by mercury emitted outside of the U.S. Canada and Mexico) deposition rates estimated by the EPA in 2008. The BMM expansion would contribute 0.2% to 2.1% of the total mercury deposition from all sources to the immediate watersheds in the project area, including Ruby Valley that contains Ruby Lake/Marsh, based on EPA REMSAD modeling.”

We did not see the global deposition contribution (0.2% to 2.1%) in the FEIS text. In addition, we do not see the global deposition contribution analysis as correct for fugitive emissions, since the global deposition analysis assumes that mercury vapor rises into the upper atmosphere to produce a mixing pool of mercury from all global sources. Unlike emissions from thermal process at the mine site the fugitive emission rise from land surfaces and we would expect these mercury emission to linger at lower elevations in the atmosphere and are likely to have a greater local deposition rate than mercury from the global pool. For this reason we see the proportion of mercury relative to the global deposition as not conservative and probably underestimates the impact from fugitive emissions.

GBRW made the following comment:

“GBRW disagrees with the approach in the DEIS on the cumulative affects of ground water pumping. The analysis presented is based on the total study area of the four hydrographic basins, which represents a perennial yield 92,000 acre feet per year (AFY) with a total allocation of 60,053 AFY (DEIS, p.3.3-64). The total allocation for mining and milling represents about 4% of the total appropriation, and the DEIS concludes, “this level of groundwater pumping would have a small effect on the total groundwater resource available in the study area.” (DEIS, p.3.3-64) However, if the individual hydrographic basins are examined, Table 3.3-4 (DEIS), Long Valley Basin is appropriated at 4,749 AFY and 4,000 AFY is mining a milling. Thus, for this basin it is more like 84% of the available water for the basin is used to mining, and is greatly

affecting other water users in the basin including wildlife needs. BLM should motivate a finer detail analysis to assess how other water needs are affected. One level finer is the hydrographic basin, where it is assumed that the water is partially contained. Of course there exists basin-to-basin movement, but the primary availability is the perennial yield of the basin. Even within a basin there is often great variation in hydraulic conductivity, thus the affect of groundwater pumping maybe be non-uniformly experienced within a basin.”

BLM’s response to this comment:

“The Cumulative Effects Study Area (CESA) for Water Quantity and Quality was established by the BLM management team during the early stages of development of the DEIS to include the Huntington Valley, Newark Valley, Long Valley, and Ruby Valley hydrographic basins. These hydrographic basins were include in the CESA because portions of the project extend into each of these four basins as shown on Figure 3.3-1 of the DEIS and is a reasonable area for the cumulative analysis.”

This response is unsatisfactory and does not address our core concern, which is methodology, the conceptual approach to the determination of impacts.

Conclusion

GBRW does not support the proposed action. Even the DEIS cites numerous potential negative affects on the wildlife in the region. Our view is that the mine should not expand further and land managers need to work towards improving conditions on the ground. It will be difficult to arrest the existing problem if expansion occurs. However, under the expansion scenarios, the West Redbird Modification alternative is the best option from our perspective.

Thank you for the opportunity to submit these comments.

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 "H".

John Hadder
Director
Great Basin Resource Watch

Bob Fulkerson
Director
Progrssive Leadership Alliance of Nevada