KINROSS GOLD (USA) INC.
MONTEZUMA EXPLORATION PROJECT

ENVIRONMENTAL ASSESSMENT

DOI-BLM-NV-B020-2025-0027-EA

June 2025

Bureau of Land Management
Battle Mountain District
Tonopah Field Office
1553 South Main Street
Tonopah, Nevada 89049

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF ACRONYMS AND ABBREVIATIONS

°F	Degrees Fahrenheit
BAPC	Bureau of Air Pollution Control
bgs	Below Ground Surface
BLM	Bureau of Land Management
BMP	Best Management Practice
CFR	Code of Federal Regulations
CH_4	Methane
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
DOI	Department of Interior
EA	Environmental Assessment
EPM	Environmental Protection Measures
FEIS	Final Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
GHG	Greenhouse Gases
HAP	Hazardous Air Pollutant
HMA	Herd Management Area
Kinross	Kinross Gold USA, Inc.
kV	Kilovolt
N_2O	Nitrous Oxide
NAC	Nevada Administrative Code
NDEP	Nevada Division of Environmental Protection
NDOW	Nevada Department of Wildlife
NDWR	Nevada Division of Water Resources
NEPA	National Environment Policy Act
Notice	Notice of Intent
NOx	Nitrogen Oxides
NRHP	National Register of Historic Places
NSF	National Sanitary Foundation
NVAAQS	Nevada Ambient Air Quality Standards
OHV	Off-Highway Vehicle
P.L.	Public Law
PFYC	Potential Fossil Yield Classification
Plan	Plan of Operation
PM	Particulate Matter
Project	Montezuma Exploration Project
RFEA	Reasonably Foreseeable Effects Area
RFFA	Reasonably Foreseeable Future Action
RMP	Resource Management Plan
ROW	Right-of-Way
RV	Recreational Vehicle
SO_2	Sulfur Dioxide
SRP	Special Recreation Permitted
SWReGAP	Southwest Regional Gap Analysis Project
TFO	Tonopah Field Office

tpy	Tons Per Year
TSP	Total Suspended Particulate
U.S.C.	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UUD	Unnecessary or Undue Degradation
VOC	Volatile Organic Compounds
VRM	Visual Resources Management

1.0 INTRODUCTION

The Tonopah Field Office (TFO) of the United States Department of the Interior (DOI) Bureau of Land Management (BLM) Battle Mountain District received an exploration Plan of Operations (Plan) for the Montezuma Exploration Project (Project) from Kinross Gold USA, Inc. (Kinross) on January 31, 2024. The BLM deemed the Plan complete on November 25, 2024 (NVNV105862633). The Plan is in compliance with BLM Surface Management Regulations 43 Code of Federal Regulations (CFR) 3809, as amended (BLM 2012), and Nevada reclamation regulations at Nevada Administrative Code (NAC) 519A.

The Project is located on public lands administered by the BLM TFO approximately seven miles southwest of Goldfield, Nevada, in Esmeralda County. The Plan boundary is located in Mount Diablo Meridian, Nevada within all or portions of Township 3 South, Range 41 East, Sections 13, 14, 15, 16, 20, 21, 22, 23, 24, 25, 26, 27, 28, and 29 (**Figure 1** and **Figure 2**). The Project can be accessed from Goldfield by driving south on United States Highway 95 for approximately six miles and turn west on to East Railroad Spring Road for approximately eight miles then straight onto Jackson Wash Road for approximately four miles **(Figure 1** and **Figure 2)**.

Kinross previously conducted exploration activities under a Notice of Intent (Notice) NVNV106237934 in the area. The Notice allows for up to 4.64 of surface disturbance and currently has a total as-built acreage of 3.38 acres. A portion of the Notice overlaps the proposed Plan boundary.

The Project would implement phased mineral exploration activities within the 5,672-acre Plan boundary. Phase I of the exploration would disturb approximately 47.51 acres including 44.58 acres of new surface disturbance and 2.93 acres of the Notice existing disturbance within the Proposed Project boundary. This Plan would include additional phases of exploration on approximately 202.49 acres for a total of 250 acres of surface disturbance over a 10-year period.

1.1 Purpose and Need

The BLM's purpose for the federal action is to respond to the Plan and provide Kinross the opportunity to explore, locate, and delineate locatable gold deposits on their unpatented mining claims on public lands as authorized under the General Mining Law of 1872, as amended.

The need for the federal action is established by the BLM's responsibility under Section 302 of the Federal Land Policy and Management Act of 1976 (FLPMA) and the BLM Surface Management Regulations at 43 CFR 3809, to respond to a plan of operations and to take any action necessary to prevent unnecessary or undue degradation (UUD) of the public lands.

1.2 Decision to be Made

The decision the BLM would make includes the options of 1) approve the Plan with no modifications; 2) approve the Plan with mitigation measures that are needed to prevent UUD of public lands and reduce or eliminate the effects of the Proposed Action or alternatives; or 3) deny approval of the Plan as written and not authorize the Project if it is found that the Proposed Action does not comply with the 43 CFR 3809 and the FLPMA mandate to prevent UUD.

1.3 Land Use Plan Conformance and Other Permits and Approvals

The BLM is responsible for the preparation of this Environmental Assessment (EA), which was prepared in conformance with the National Environmental Policy Act (NEPA), 42 United States Code (U.S.C.) §§ 4321 et seq and applicable laws and regulations passed subsequently, including DOI requirements, and the policy guidance provided in the BLM NEPA Handbook H-1790-1 (BLM 2008). Under 43 CFR 3809.415, the operator of a plan of operations must prevent UUD to the public lands. The Proposed Action conforms with the BLM's Tonopah Resource Management Plan (RMP) Record of Decision dated October 1997 (BLM 1997), and the Nevada and Northeastern California Greater Sage-Grouse Approved Resource Management Plan Amendment (as there is no Greater Sage-Grouse or Bi-state Sage-Grouse (*Centrocercus urophasianus*) habitat within the Plan boundary (BLM 2015).

The Tonopah RMP guides the management of the public land resources for portions of south-central Nevada in Nye and Esmeralda counties, encompassing 6.1 million acres of public land (BLM 1997). Resources and program emphases in the RMP includes wildlife habitat, special status species, riparian areas, forestry and vegetative products, livestock grazing, wild horses and burros, lands and rights-of-way (ROWs), cultural resources, recreation, utility corridors, and locatable and leasable minerals (BLM 1997). The RMP designates 6,028,948 acres (99 percent of the Tonopah Planning Area) open to the operation of existing mining laws (BLM 1997). The RMP states the "BLM provides for mineral entry, exploration, location, and operations pursuant to the mining laws in a manner that: 1) will not unduly hinder the mineral activities, and 2) assures that these activities are conducted in a manner which will prevent undue or unnecessary degradation of the public land" (BLM 1997).

In addition to this EA, implementation of the Proposed Action would require authorizations from other federal, state, and local agencies with jurisdiction over certain aspects of the Project. Kinross is responsible for amending existing permits, applying for, and acquiring additional permits and approvals determined necessary.

The Proposed Action would be consistent with federal laws and regulations; state and local government laws and regulations; and other plans, programs, and policies, to the extent practicable within federal law, regulation, and policy. The BLM has prepared this EA in accordance with the following statutes and implementing regulations, policies, and procedures that govern the BLM's actions including: NEPA (42 United States Code [U.S.C.] 4321 et seq); DOI NEPA Regulations (43 CFR part 46); BLM NEPA Handbook H-1790-1 (BLM 2008); FLPMA (43 U.S.C. 1701 et seq); Mining and Mineral Policy Act of 1970 (30 U.S.C. 21a); Locatable Minerals Surface Management Regulations (43 CFR 3809); Use and Occupancy under the Mining Laws (43 CFR 3715); and BLM Reclamation Standards as referenced in the BLM Manual Handbook H-3042-1.

Executive Order 14154, Unleashing American Energy (January 20, 2025), and a Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (January 21, 2025), require the Department to strictly adhere to NEPA, 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (February 11, 1994) and 14096 (April 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The BLM verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 CFR Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025

Order and Memorandum. The BLM has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA[1], previously found at 40 CFR Parts 1500–1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.

The Project also adheres to the 2013 Final Esmeralda County Public Lands Policy Plan (Esmeralda County 2022) and the Esmeralda County Master Plan (Esmeralda County 2011) which provide guidance on how Esmeralda County can work collaboratively with federal planning agencies, including the BLM, on public land use issues.

1.3.1 Scoping, Public Involvement, and Issue Identification

The Proposed Action was internally scoped by the BLM interdisciplinary team and a baseline data needs assessment form was created. During the internal scoping meeting, the BLM and other agency resource specialists identified the elements associated with supplemental authorities and other resources and uses to be addressed in this document as outlined in Chapter 3. Issues and potential effects related to the following specific resources associated with the Proposed Action were identified as follows: Air Quality, Cultural, Forestry, Geology/Minerals, Native American Concerns, Paleontological, Recreation, Social and Economic Values, Soils, Vegetation (including Noxious Weeds), Visual, Water Quality/Quantity, Wild Horse and Burros, and Wildlife (including Migratory Birds, and Special Status Species).

[1] While the BLM recognizes that the Council on Environmental Quality regulations may not be judicially enforceable or binding on this agency action, the BLM is nonetheless voluntarily using these regulations as guideposts, in conjunction with BLM's regulations at 43 CFR part 46, to implement the NEPA, 42 U.S.C. §§ 4321 et seq, as amended.

2.0 ALTERNATIVES INCLUDING THE PROPOSED ACTION

2.1 Proposed Action

The Proposed Action is a site-specific action that proposes phased mining exploration for 250 acres within the Plan boundary of 5,672 acres (**Figure 3**). Kinross proposes mineral exploration activities including constructing drill sites with sumps, exploration drilling, drilling a water supply well and monitoring wells, constructing temporary access roads, overland travel, constructing a laydown area, maintenance of existing roads, and reclamation of new disturbance. (Kinross 2024).

The Proposed Action includes a portion of Notice NVNV106237934 that overlaps the proposed Plan boundary with 2.93 acres of disturbance (**Figure 3**; **Table 2-1**); Phase I that would create approximately 44.58 acres of new surface disturbance (**Figure 3**; **Table 2-1**); and subsequent phases of exploration activities on the remaining 200.99 acres. All exploration activities would be within the Plan boundary and occur during a 10-year period; however, the timing of these activities may change due to economic conditions. The Plan boundary would be located entirely on public land on Kinross mining claims (**Table 2-2**).

Table 2-1 Surface Disturbance on Public Land by Exploration Activity

Exploration Activity	Phase I		Subsequent Phases (acres)	Total (acres)
	Notice Disturbance (acres)	[1]New Disturbance (acres)		
Existing Drill Sites	1.75	-	202.49	1.75
Lay Down Area	0.37	2.10		2.47
Constructed Roads	0.81	-		0.81
Drill Roads 0-9.9%	N/A	5.72		5.72
Drill Roads 10-19.9%	N/A	7.41		7.41
Drill Roads 20-29.9%	N/A	5.21		5.21
Drill Roads 30-39.9%	N/A	3.72		3.72
Drill Roads >40%	N/A	5.36		5.36
Drill Sites 0-9.9%	N/A	3.02		3.02
Drill Sites 10-19.9%	N/A	4.78		4.78
Drill Sites 20-29.9%	N/A	2.58		2.58
Drill Sites 30-39.9%	N/A	2.30		2.30
Drill Sites >40%	N/A	2.38		2.38
Total	**2.93**	**44.58**	**[2]202.49**	**250**

Source: Kinross 2024

[1] Data is updated when reclamation cost estimates are updated.

[2] The Plan of Operations includes subsequent phases of exploration activities with the BLM requiring work plans with the exact locations and types of exploration activities and disturbance for each phase.

2.1.1 Phase I Exploration Drilling

Phase I would include Notice disturbance (2.93 acres) and new surface disturbance (44.58 acres). Exploration activities would include constructing up to 48 new drill sites with sumps (**Table 2-1**) (15.06 acres) and drilling; utilizing up to 19 drill sites in the Notice disturbance, construction of access roads (27.42 acres); and a laydown yard (2.10 acres) (**Table 2-1**; **Figure 3**). In addition, approximately 4.04 miles of existing roads would be improved within their existing disturbance

footprint for safe access (**Figure 3**). The existing roads would not be reclaimed by Kinross at the end of the Project and are not included in the disturbance calculations shown in **Table 2-1**.

Table 2-2 Project Mining Claims

Pad ID	Easting	Northing	Township	Range	Section
MZ23-AB	467611	4169252	T3N	R 41 E	23
MZ23-AC	467663	4168693	T3N	R 41 E	23
MZ23-AE	466080	4168000	T3N	R 41 E	22
MZ23-AF	467728	4168499	T3N	R 41 E	23
MZ23-AG	467260	4168758	T3N	R 41 E	22
MZ23-AH	467672	4168808	T3N	R 41 E	23
MZ23-AI	466969	4168780	T3N	R 41 E	22
MZ23-AJ	467007	4169083	T3N	R 41 E	22
MZ23-AK	467296	4169194	T3N	R 41 E	22
MZ23-AL	468029	4169647	T3N	R 41 E	14
MZ23-AM	467670	4169735	T3N	R 41 E	14
MZ23-AN	466917	4169598	T3N	R 41 E	15
MZ23-AO	467140	4168595	T3N	R 41 E	22
MZ23-AP	467257	4168604	T3N	R 41 E	22
MZ23-AQ	464032.8	4167569	T3N	R 41 E	29
MZ23-AR	464229	4167526	T3N	R 41 E	29
MZ23-AS	463604.48	4167629.88	T3S	R 41 E	29
MZ23-AT	464745	4167801	T3N	R 41 E	28
MZ23-AU	466112	4169250	T3N	R 41 E	22
MZ23-AV	465933	4169277	T3N	R 41 E	22
MZ23-AW	466041	4169267	T3N	R 41 E	22
MZ23-AX	468265	4168319	T3N	R 41 E	23
MZ23-AY	468643	4168356	T3N	R 41 E	23
MZ23-AZ	468760	4168946	T3N	R 41 E	23
MZ23-BA	466525.7	4168618	T3N	R 41 E	22
MZ23-BB	466631	4168715	T3N	R 41 E	22
MZ23-BC	466386	4168559	T3N	R 41 E	22
MZ23-BD	466846	4169143	T3N	R 41 E	22
MZ23-BE	466777	4168982	T3N	R 41 E	22
MZ23-BF	466778	4168855	T3N	R 41 E	22
MZ23-BG	466639.5	4168841	T3N	R 41 E	22
MZ23-BH	467838	4169150	T3N	R 41 E	23
MZ23-BI	467630	4169403	T3N	R 41 E	23
MZ23-BJ	467652	4169596	T3N	R 41 E	14
MZ23-BK	467557	4169146	T3N	R 41 E	23
MZ23-BL	468230	4169538	T3N	R 41 E	14
MZ23-BM	466311	4168523	T3N	R 41 E	22
MZ23-BN	466269	4168462	T3N	R 41 E	22
MZ23-BO	466209	4168412	T3N	R 41 E	22
MZ23-BP	469407.3	4168874	T3N	R 41 E	24
MZ23-BQ	470040.1	4168704	T3N	R 41 E	24
MZ23-BR	469622.5	4167125	T3N	R 41 E	25
MZ23-BS	465415.2	4168459	T3N	R 41 E	21
MZ23-BT	469264.8	4167949	T3N	R 41 E	24
MZ23-BU	469220.7	4167402	T3N	R 41 E	25
MZ23-BV	469241.1	4166928	T3N	R 41 E	25

Pad ID	Easting	Northing	Township	Range	Section
MZ23-BW	468155.3	4168562	T3N	R 41 E	23
MZ23-BX	468195.6	4169024	T3N	R 41 E	23

Drilling would include up to six drill crews with up to 12 holes open at the same time. Upon completion of drilling and abandonment of the drill hole at each site, the sumps would be reclaimed at the earliest feasible time. Drill roads and sites would be reclaimed after sample results are received and it is determined the road or pad is no longer needed for additional phases of the Proposed Action. Drilling would be for 10 years with work plans for additional phases submitted to the BLM as Kinross determines the location of the additional sites.

Water would be hauled from a municipal water source until a water supply well is developed within the Plan boundary. Exploration operations, Environmental Protection Measures (EPMs), and reclamation for all phases are described in detail below.

2.1.2 Additional Phases of Exploration

Exploration drilling would occur according to confirmed geologically favorable target areas. To accommodate this progression of mineral exploration, Kinross would conduct drilling in phases within the Plan boundary until the maximum disturbance of 250 acres is reached. Work plans for each phase would include access road alignment, drill site location, the number and type of drill rigs expected, construction schedule, drilling schedule, reclamation schedule, any changes to previously authorized work plans, and any updates to the reclamation cost estimate and bonding. These work plans would be submitted to the BLM and the Nevada Division of Environmental Protection (NDEP). Exploration operations, EPMs, and reclamation for all phases are described in detail below.

On receipt of a work plan, the proposed activities would be reviewed by the BLM and NDEP for concurrence with the approved Plan and reclamation cost estimate. Each phase of exploration would be within the scope and analysis of this EA and Kinross would not commence surface-disturbing activities in new locations included in the work plans until reclamation cost estimates and financial guarantee are approved.

2.1.3 Project Schedule

The Project would begin during the first available field season following authorization of the Plan. The exploration drilling operations could be conducted 24 hours per day, seven days per week for a period of up to 10 years. The exploration drilling program would be conducted as either a single 12-hour shift per day or two 12-hour shifts per day. Typical crew rotation could result in a continuous operation 24 hours per day until drilling operations are completed. Crews typically work on a 10-day on, four-day off or 20-day on, eight-day off rotation.

Each borehole would take about five to 10 days to complete, depending on hole depth, drilling conditions, and weather. Drill core and other geologic samples would be removed from each drill site within one week of completing drilling at the site and prior to the site being reclaimed. The total time to complete each borehole is dependent on borehole conditions encountered, availability

of drill rigs, and actual depth drilled. The total time to complete 48 boreholes is dependent on borehole conditions encountered, availability of drill rigs, and actual depth drilled.

All personnel and Project supplies would be transported to the site from Goldfield on a daily or as-needed basis. No camping is proposed or would be allowed in the Plan boundary.

2.1.4 Water Supply

Initially under Phase I water for drilling operations would be obtained from a municipal source in Goldfield (Water Right 27309) and hauled daily to the Project by 4,000-gallon or smaller water trucks, to maintain drilling operations and for dust control. A 20,000-gallon water storage tank would be utilized within the Project to store water until it can be hauled to the drill rigs. The maximum water consumption for drilling and dust suppression is estimated at 10,000 to 15,000 gallons per day depending on actual subsurface conditions encountered during drilling operations.

A water supply well would be drilled at one of the two proposed locations within the Plan boundary (**Figure 3**) to supply fresh water to support drilling operations. The water well would be a six-inch diameter and drilled to 2,000 feet deep. A portable generator would power the pump and water would be stored in a 20,000-gallon portable storage tank. Water would be hauled from the storage tank to the rigs by 4,000-gallon or smaller water trucks as needed to maintain drilling operations and for dust control. If possible, the water well and storage tank would be located on a constructed drill site to reduce disturbance.

The water well would be drilled in accordance with applicable regulations of NAC 534 and in a manner to prevent degradation to water quality. A Nevada Division of Water Resources (NDWR) waiver would be obtained following the requirements of NAC 534.442. Best Management Practices (BMPs) would be used to reduce sediment, control stormwater, and manage drilling fluids.

2.1.5 Drill Site Access

Kinross would use all existing public roads within the Plan boundary to access Kinross-controlled mining claims (**Figure 3**). There would be no unauthorized off-road travel by Kinross personnel.

As needed, approximately 4.04 miles of existing roads would be improved within the existing disturbance footprint. Minor maintenance and repair of the existing road surface may be necessary to provide a safe and durable running surface, manage stormwater controls, and watered as necessary for dust control. Routine road maintenance may consist of smoothing ruts, grading, removal of large rocks, filling holes with fill material, and re-establishing waterbars and/or rolling dips when necessary. No culverts would be installed, unless approved by the BLM.

Approximately 11.66 miles of new roads would be constructed for a single lane of travel averaging 14 feet wide or less, depending on underlying slope and construction difficulty. The actual disturbance width of roads would vary depending upon underlying topography. Berms would be constructed, as required for safety purposes, on the down slope side of constructed roads. Berms would be constructed within road disturbance footprints to accommodate drainage control features to control runoff and minimize erosion. Kinross would construct new temporary roads utilizing BMPs to manage sedimentation from stormwater events including but not limited to features such

as settling basins or straw wattles. No culverts would be installed on newly constructed temporary exploration roads, unless approved by the BLM. Material would be side cast adjacent to the disturbance for reclamation. Prior to final reclamation, newly constructed roads would be graded, and water-barred to minimize erosion as BLM directs.

Overland travel, without blading, would be used where practical and safe. Efforts to minimize surface disturbance would be implemented where overland travel occurs.

2.1.6 Drill Site Construction

Each drill site would be a maximum of 100 feet by 100 feet (approximately 0.23 acres), but the actual disturbance width would be slope dependent (**Table 2-1)**. The individual drill site footprint includes enough area for the drill site construction and the sumps to be placed on the drill site. Each drill site is sized to accommodate a track-mounted or truck-mounted core rig or reverse circulation drilling rig. Multiple drill holes with different angles may be drilled at each site. Drill sites could also be used as laydown (storage) areas within the Plan boundary for staging equipment, drill water, and related material storage and conveyance during operations.

Sumps would be constructed within the footprint of the drill site or adjacent to it depending on the underlying ground slope. Sump dimensions would be approximately 20 feet long by 10 feet wide by six feet deep and sloped for wildlife egress. If core drill rigs are used, a portable mud system using surface tanks and an integrated solids removal unit may be used instead of sumps.

2.1.7 Drilling Operations

Kinross has designed and would implement all drilling and borehole abandonment operations in conformance with BLM and State of Nevada groundwater quality and quantity protection requirements. Generally, Kinross would not conduct drilling operations in a manner that would introduce contaminants or pollutants to the subsurface or that wastes groundwater by allowing uncontrolled losses of drilling fluids or gains from water bearing strata encountered in the borehole. No water or drilling effluent would be allowed to flow uncontrolled from sumps. Although not anticipated based on drilling techniques, Kinross would be prepared to shut down reverse circulation drilling activities if excessive groundwater were encountered during the drilling process and could not be controlled using available containment plans or BMPs. Specific regulatory requirements and methods for borehole abandonment are described below.

Planned borehole lengths (total vertical depths are dependent on borehole angle from horizontal) would average 1,700 feet below ground surface (bgs). Borehole lengths would range from 1,000 feet to 2,500 feet. Multiple boreholes (vertical and angle) may be drilled from a single drill site and would utilize the same drill sump where possible, but if additional sumps are needed, they would be adjacent to the drill site with small incremental additional disturbance area. A maximum of 12 exploration boreholes would be open at any one time. Samples recovered from the drill holes would be placed in sample bags or core boxes for on-site geologic examination and characterization and then transported off site to an assay laboratory.

In some cases, boreholes may be started with reverse circulation rigs and finished with core rigs. Plugging requirements at NAC 534.4371 would be followed to prevent any potential contamination and cross-flow. If artesian conditions are encountered with any boreholes, Kinross

would comply with State regulations at NAC 534.378. As described above, a portable construction storage tank may be used to store water for exploration operations. Depending on location of the storage tank, temporary high-density polyethylene pipe overland pipelines may be used to supply water to drill sites.

Up to 10 monitoring wells could be drilled within the Plan boundary. The monitoring wells would be completed to a four-inch-diameter drilled to approximately 2,000 feet deep. A NDWR waiver would be obtained following the requirements of NAC 534.441 for each monitoring well before construction.

Dependent on drilling results, Kinross may determine a need for geotechnical investigative drilling activities as part of the Plan. This drilling would have similar disturbance footprints as the other drilling operations already described including utilizing a diamond core, reverse circulation, auger, or sonic drill rigs. Specific details would be outlined in each phase's work plan, as needed.

2.1.7.1 Water Quality and Quantity Information

The depth to groundwater is estimated to range between 1,200 and 2,000 feet bgs based on topography and previous drilling within the Plan boundary. There are no identifiable, recorded well records in the township where drilling is proposed.

Monitoring wells would be drilled as needed with locations submitted in work plans. Kinross would attempt to locate the wells and associated equipment on constructed drill sites to reduce disturbance. If monitoring wells are installed, they would be drilled in accordance with applicable regulations at NAC 534 and in a manner to prevent degradation to water quality. Impacts to water quality are not anticipated as Kinross would employ BMPs to reduce sediment, control stormwater, and manage drilling fluids.

2.1.7.2 Drilling Fluid Materials

All drilling fluid additives and borehole abandonment materials would be products meeting National Sanitary Foundation (NSF) Standards 60 and/or NSF Standard 61 that are certified for direct or indirect use in domestic water supply wells or municipal drinking water treatment systems. All materials would be stored in a manner as to not present hazards to wildlife or other animals and prevent a release to the environment. Bagged or dry bulk materials would be covered, and any liquid additives would be kept in secure, leak-proof containers.

2.1.7.3 Drilling Fluid and Borehole Cuttings Management

Depending on the drill type sumps or portable surface mud systems would be used to capture drilling fluids and cuttings. When using wireline diamond core methods, Kinross would use a portable closed loop "mud" (drilling fluid) circulation system. This system consists of a freshwater bentonite and polymer-based drilling fluid used as a circulating medium to lubricate and cool the bit and drill rods, control borehole fluid losses or gains, and remove cuttings from the borehole during drilling operations.

Hydrological control of the borehole would be maintained by controlling drilling fluid losses and gains with the use of NSF certified materials added to fresh make-up water. This produces a drilling fluid with chemical and physical properties that allow very minor fluid losses to the surrounding formations to build a "filter cake" that "seals" the borehole and adjacent country rock

from substantial loss or gain of fluid in the borehole. The differential pressures created by the increase in fluid density in the borehole tend to be greater than the formation pressures usually encountered in relatively shallow mineral exploration drilling.

Kinross may use portable surface mud systems with the capability to remove drill cuttings (solids) from the circulating drilling fluid to maintain the desired fluid density. Processed drilling fluid would be reconditioned as needed with additional freshwater, bentonite, and other NSF-certified materials, then returned to the borehole to maintain circulation in a closed loop. Drilling fluids would not be discharged from the drill site or to the surrounding environment during drilling operations.

Dewatered drill solids would be deposited via a waste chute to a bulk container or a wheelbarrow for transport and placement against the cut bank side of the drill site. Any seepage from dewatered drill solids would be contained by additional construction measures, straw bales, or straw wattles within the limits of the drill site working surface.

When sumps are used, drilling fluid products used during drilling and abandonment operations would be contained and deposited in sumps to ensure environmental protection. If any groundwater is produced during drilling, Kinross would be prepared to shut down reverse circulation drilling activities. If excesses water is encountered, it would be discharged from the sumps after drilling fluids and solids are allowed to settle. BMPs, such as straw bales or waddles, would be employed to prevent erosion and degradation of the area. Discharge rates would not exceed the threshold volume (250 gallons per minute) and time (48 hours) requiring a discharge permit from the State of Nevada.

Kinross proposes to spread the dewatered drill solids in a thin layer along the length of the drill site against the cut bank and these would be covered with at least two feet of soil or backfilled material at the time of reclamation. If sumps are used, the cuttings would be left in the sumps, dried, and buried with a minimum of two feet of soil or backfill.

2.1.7.4 Borehole Abandonment

Upon completion of drilling operations, while the rig is still over the borehole and before moving the drill rig from the site, an abandonment fluid meeting the formulation standards required by NAC 534. would be mixed at the surface, pumped under pressure through the drill pipe, and circulated from the bottom of the borehole through the annulus in a manner meeting the general plugging requirements of NAC 534.420 and NAC 534.426 for general or artesian conditions. This would include the annular space surrounding any casing left down the hole.

If circulation from the bottom is not possible, abandonment fluid would be mixed at the surface, circulated through the drill pipe from the bottom of the borehole under pressure and placed in phases as the drill pipe is retrieved from the borehole, keeping the bottom of the drill string below the abandonment fluid level at each pumping phase.

After the rig has left the site and the abandonment fluid has been allowed to stabilize in the borehole, a 20-foot cement surface plug extending from three feet bgs would be placed in the top of each borehole. Portland cement mixed with freshwater and aggregates, or bagged cement mixed with freshwater, would be used for the surface plug. Any remaining surface casing would be removed below the ground surface to a sufficient depth that would not interfere with general

reclamation requirements to eliminate physical hazards to humans and wild or domestic animals as well as to prevent ponding of water directly over the borehole, allow for placement of growth media, and allow for passage of earthmoving equipment required for reclamation operations.

A record of each borehole would be kept by Kinross as required by NAC 534.4369.

2.1.8 Fuel Storage and Hazardous Material Storage

All hydrocarbons used would be stored on the equipment and fueling of equipment would be done with mobile fuel/lube trucks. A temporary 8,000-gallon double-walled fuel tank may be utilized within the Project for equipment fueling. Kinross would implement BMPs that would prevent or reduce the quantity of potential pollutants discharged to the soil, groundwater, or surface water.

2.1.9 Electrical Power

Portable electrical power sources (light plants) would be used for the exploration activities. Any supplemental power needed at the site would be provided by the portable generators on the drill rigs.

2.1.10 Communications

On-site communications would be provided through two-way radios, Wi-Fi calling, and cellular service, as available.

2.1.11 Employee Training

Kinross along with their designated representatives would train employees, contractors, and other related personnel as to the operational, environmental, and cultural resources responsibilities required under this Proposed Action as well as state and federal law.

2.1.12 Quality Assurance Plan

Kinross would conduct site inspections of exploration activities on a daily basis. Radio and/or mobile phone contact would be maintained with the construction and drill crews to address unexpected conditions or problems that may be encountered.

Preventative measures would be taken to ensure that cultural sites, sensitive wildlife habitat, and wildlife are avoided. In addition, any stipulations or other permit conditions imposed by the BLM during the review process would be strictly enforced by Kinross.

2.1.13 Proposed Equipment and Vehicles

Typical vehicles and equipment would be utilized in the Plan boundary (**Table 2-3)**. The exact equipment used would be determined by the selected contractor and operational conditions.

Table 2-3 List of Proposed Project Equipment

Equipment	Number
Diamond Core Drilling Rig	Up to five
Reverse Circulation Drilling Rig	Up to three

Equipment	Number
Pipe Truck or Trailer	Up to six
Three Axle Flatbed Truck	One
Centrifuge Drill Mud Systems	Up to three
Auxiliary Air Compressor	Up to six
Water Storage Tanks 20k Gallon	Up to three
4K Gallon Water Truck	Up to six
7K Gallon Water Truck	One
Backhoe	Up to three
Rubber Tire Loader	One
Excavator	Up to two
Dozer	Up to two
Tandem Axle Dump Truck	Up to two
Portable Generator	Up to two
Portable Light Plant/Generator (6 kW or similar)	Up to six
Portable Fuel Tank (500 Gallons or less)	One
Temporary Double-Walled Fuel Tank 8,000 Gallon	One
Light Vehicles	Up to fifteen
UTV/ATV	Up to two
Portable Toilets	Up to four

Source: Kinross 2024

A maximum of six drill rigs of either type would be on site at one time. Equipment maintenance and repairs would be conducted on site. Substantial repairs would either be done on site by a service truck or moved off site for repairs. All equipment would be washed at the nearest facility prior to use on public lands to prevent transport of weeds. All portable equipment, including drill rigs, support vehicles, and drilling supplies, would be removed from the Plan boundary during extended period of non-operations.

2.1.14 Structures

Portable toilets would be provided for drill and construction crews. One toilet would be provided for every 10 crew members as stated by Mine Safety and Health Administration regulations at 30 CFR 71.500. One or more portable toilets would be kept in active drilling areas while crews are present and would be removed upon completion of the drilling programs.

Public access routes through or around the Plan boundary to adjacent public lands would not be closed unless required for public safety, in which case, locations and reasons for any enclosures, fences, gates, and signs intended to exclude the general public would be defined in work plans submitted to the BLM for approval.

2.1.15 Environmental Protection Measures

Kinross would comply with the performance standards described in 43 CFR 3809.420 to prevent UUD of public lands during all phases of the Proposed Action, including construction, operation, and reclamation. Kinross would also commit to the following EPMs as part of the Proposed Action.

2.1.15.1 Air Quality

Roads, drill sites, and other disturbed areas affected by Kinross operations and activities would be watered as needed to control fugitive dust in conformance with the NDEP Bureau of Air Pollution Control (BAPC) Air Quality BMPs. Vehicular traffic would be minimized, and prudent speeds observed to minimize fugitive dust emissions, protect wildlife and livestock, and maintain operational safety. Vehicles associated with the exploration program would maintain a safe and appropriate speed limit for existing road conditions.

2.1.15.2 Water Quality

Water Use

Water meeting domestic drinking water standards would be used for drilling fluids and fugitive dust control and would be imported from municipal or other permitted sources outside of the Project area. Water supply and storage information is further described above in the Project Description.

All water used on the Project would be consumptively used on drilling operations and dust control efforts. There is no need for treatment or disposal facility.

Erosion Control

Kinross would conduct exploration operations to minimize soil erosion. Equipment would not be operated when ground conditions are such that excessive resource damage or increased sediment transport will occur. BMPs would be utilized to control erosion and sedimentation.

Drilling fluid effluent from the borehole and drilling fluid products used during drilling and abandonment operations would be contained and stored, managed, and reclaimed as described in the Project Description above.

BMPs for erosion and sediment control would be utilized during construction, operation, and reclamation to minimize sedimentation from disturbed areas. Sediment control structures would include, but not be limited to, fabric and/or certified weed free straw bale filter fences, siltation or filter berms, mud sumps, and down gradient drainage channels to prevent unnecessary or undue degradation to the environment. Sediment traps (sumps), constructed as necessary adjacent to drill sites, would be used to settle drill cuttings, and prevent uncontrolled release of drill cuttings in produced groundwater. To control erosion from roads and drill sites, and from the unlikely event of drilling cuttings being released, certified weed-free straw bales and silt fences would be placed in drainages to capture sediment, where required. To facilitate drainage and prevent erosion, all bladed roads would have waterbars constructed as determined by site conditions and grade.

2.1.15.3 Weed Management

Noxious weed control measures shall be taken in accordance with the BLM requirements. All equipment shall be washed prior to entering the Plan boundary to prevent the introduction of noxious weeds into the Plan boundary. Kinross has developed an Integrated Weed Management Plan as part of the Plan that outlines methods to prevent and control the spread of noxious plant species during the construction, operation, and post-reclamation phases of the Project.

2.1.15.4 Solid and Hazardous Wastes

Non-hazardous Project-related refuse, mostly composed of empty drilling fluid additive bags and containers, would be collected in approved trash bins and/or containers with lids and hauled from the site by Kinross or their contractors for disposal at an approved landfill on a regular basis. Debris that may have a hazardous characteristic, residue, or contain fluids would not be disposed of in these trash bins and would be managed as a hazardous substance. To minimize impacts during precipitation events, trash bins would be regularly inspected for leaks and the lids would remain closed except when depositing debris. The trash bins would not contain materials that may attract wildlife (food items, etc.) and would be emptied on a regular basis.

All drilling fluid materials and additives are NSF certified for use in public water wells and treatment systems and have no hazardous or toxic components.

Transportation of hazardous substances would be conducted in accordance with applicable regulatory guidelines. Fuel (gasoline and/or diesel) for drill rigs would be transported daily by pickup trucks to the site. A temporary 8,000-gallon double-walled fuel tank may be utilized within the Project for equipment fueling.

In the event of an accidental spill of fuel or other petroleum products or hazardous wastes, measures will be taken to control the spill. Hazardous material spills in exceedance of five gallons will be reported to the BLM, NDEP, and/or the Emergency Response Hotline. All spills will be cleaned up immediately, and any resulting waste will be transferred off site in accordance with applicable local, state, and federal regulations. The following BMPs will be implemented within the Project:

- Drill sites and any temporary material storage areas will be maintained in a clean and well-organized manner.
- Products and materials will not be stored in a manner on individual drill sites where the products and materials will be susceptible to meteoric precipitation by use of storage trailers, pallets, tarps, or other appropriate covers.
- Gasoline, oil, diesel fuels, and petroleum-based lubricating products will be on site in quantities necessary to operative drilling, heavy equipment, and pickup trucks.
- The manufacturer’s recommendations for proper use and disposal will be followed.
- All hazardous materials stored on site, including fixed machinery such as generators or compressors, will be placed on an impermeable material within a lined or bermed containment that will be constructed to exceed the capacity of the storage containers. The containment will be present at each staging area.
- Spill kits will be available at each active drill site, throughout the Project area, and in each vehicle in order to take the appropriate measures to control a potential spill of hazardous materials.
- Five-gallon buckets with lids will be stored on site to collect soils contaminated by accidental discharge of hazardous material.

- Designated fueling areas will be located on a level-graded area (typically on the active drill site) and will be protected from run-on or run-off. During fueling, vehicles will be attended at all times. Fueling will not occur in drainages.

- Fueling equipment will be equipped with an authorized shut-off nozzle to contain drips and to eliminate accidental overflowing. The practice of "topping off" the tank will not be allowed.

- All containers of hazardous substances will be labeled and handled in accordance with Nevada Department of Transportation and Occupational Safety and Health Administration regulations.

2.1.15.5 Scenic Values

All of Kinross's newly created disturbances would be reclaimed to the level of disturbance existing on site currently or as advised and approved by the BLM within three years of the completion of the ground-disturbing activities at the site.

2.1.15.6 Wildlife

Kinross understands the compliance obligations associated with the Migratory Bird Treaty Act, Endangered Species Act, and the need to avoid disturbing special status species during the conduct of the proposed exploration operations. Kinross would implement the following actions to enhance our compliance with these operational obligations to minimize impacts to wildlife.

- Drill sumps would be constructed with at least one sloped end to allow animals to escape the sumps.

- To avoid possible disturbance to migratory birds that may be nesting in the Plan boundary Kinross would ensure that a qualified wildlife biologist conducts a survey for nesting birds 14 days prior to conducting any surface-disturbing activities between March 1 and July 31. If ground disturbance does not occur within 14 days of the survey date, new surveys will be required. If active nests are located, a protective buffer (the size depending on the habitat requirements of the species) would be determined by the BLM based on best available science and placed around the nests to prevent destruction or disturbance to nests. If active nests are identified, no ground disturbance would be allowed within the established buffer zone until the birds are no longer actively breeding or rearing young. If the survey is done by a contractor, a copy of the survey will be provided, and any nesting activity would be reported to the BLM prior to any surface disturbance. The start and end dates of the seasonal restriction may be altered due to site-specific information such as elevation and winter weather patterns which would affect breeding chronology or the presence of migratory species. Any changes to the start and end dates of seasonal restrictions would be in consultation with the BLM.

- To avoid possible disturbance to raptors that may be nesting in the Plan boundary, ground-disturbing activity would be avoided during the time of nesting with times dependent upon species. If work must be performed during this time frame, Kinross would ensure the necessary buffers are established and a qualified wildlife biologist conducts survey(s) periodically for nesting raptors prior to conducting any surface-disturbing activities. If an active nest is identified, a protective buffer (the size depending on the species) would be

determined by the BLM based on best available science and placed around the nests to prevent destruction or disturbance to nests. If active nests are identified, no ground disturbance would be allowed within the established buffer zone until the birds are no longer actively breeding or rearing young. If the survey is done by a contractor, a copy of the survey would be provided, and any nesting activity will be reported to the BLM prior to any surface disturbance. The start and end dates of the seasonal restriction may be altered due to site-specific information such as elevation and winter weather patterns which will affect breeding chronology or the presence of migratory species.

- All wildlife injury and mortality would be reported to the BLM and the Nevada Department of Wildlife (NDOW).

- Trash and food items would be disposed of promptly in animal-proof containers. Trash containers would be emptied daily, and waste would be removed from the area and disposed of in an approved off-site landfill. Construction waste including, but not limited to, broken parts, wrapping, material, cords, cable, wire, rope, strapping, twine, buckets, metal or plastic containers, boxes, and welding rods would be removed from the site and disposed of properly.

2.1.15.7 Sensitive Plant Species

Implementation of the Integrated Weed Management Plan at the proposed Project would reduce impacts to the sensitive plant species in the Project boundary.

Joshua trees (*Yucca brevifolia*) and Pahute Mesa beardtongue (*Penstemon pahutensis*) would be avoided to the extent possible.

If a Joshua tree is problematic for access or drill pad construction, if limbing would allow access this approach would be taken. If a tree must be removed for access or drill pad construction, Kinross commits to pay for healthy Joshua trees that must be removed through a Contract for the Sale of Vegetative Resources with the BLM at the rates outlined below following the BLM fee pricing schedule by size class per the Nevada Division of Forestry Program Guidance September 2017:

- Up to 6 feet in height: $3.00 per tree
- Up to 10 feet in height: $12.00 per tree
- Over 10 feet in height: $24.00 per tree

2.1.15.8 Cultural Resources

While conducting the exploration program, in accordance with 43 CFR 3809.420(b)(8), Kinross would not knowingly disturb, alter, injure, or destroy any historical or archaeological site, structure, building or object on federal lands.

While conducting disturbance activities within 30 meters of an eligible site wherein subsurface potential has been indicated on the site formation, Kinross would have an archaeological monitor present.

Kinross shall immediately bring to the attention of the BLM Authorized Officer any cultural and/or paleontological resources that might be altered or destroyed on federal lands by Kinross operations, work will cease within 100 meters of the discovery, and Kinross shall leave such discovery intact until told to proceed by the BLM Authorized Officer. The BLM Authorized Officer shall evaluate the discoveries brought to their attention within 48 hours, act to protect or remove the resource, and would work to develop a plan to allow operations to proceed.

Kinross would not remove, disturb, alter, injure, or destroy any historical or archaeological site, structure, building, object, or artifact that meets criteria for listing on the National Register of Historic Places or has not been evaluated for National Register eligibility. Kinross would be responsible for ensuring that employees, contractors, or any others associated with the Project do not damage, destroy, or vandalize archaeological or historical sites. Should damage to cultural resources within or near the Project occur during the period of construction, operation, or rehabilitation due to the unauthorized, negligent, or inadvertent actions of Kinross or other Project personnel, Kinross would be responsible for costs of rehabilitation or mitigation. Individuals involved in illegal activities could be subject to penalties under the Archaeological Resources Protection Act (16 U.S.C. 470ii), the FLPMA (43 U.S.C. 1701), the Native American Graves and Repatriation Act (16 U.S.C. 1170), and other applicable statues.

If human remains/burials or any previously unidentified cultural (archaeological or historical) resources are discovered during the conduction of activities under the approved Plan, Kinross would immediately cease activities within 100 feet of the discovery, ensure that the discovery is appropriately protected, and immediately notify the BLM Authorized Officer by telephone, followed with written confirmation. Work would not resume, and the discovery would be protected until notified in writing by the BLM Authorized Officer that compliance with the provisions for mitigating unforeseen impacts as required by 43 CFR 3809 and additional consultation per 36 CFR 800.13.b.3 have been satisfied.

Tribes would be notified of ground construction three to five days prior to construction in order to voluntarily provide a tribal monitor during construction if desired. Monitors would be able to suggest shifts in roads and pads as long as the shift does not delay construction activities and is feasible for the Project or impact other resources. Shifting Project features could be done if it does not shift more than 200 feet from the original location and is still within the cultural survey boundaries and not in an avoidance area. Work Plan submissions for additional phases would also be submitted to the tribal contact at the same time as the BLM with the same review timelines.

2.1.15.9 Paleontological Resources

While conducting the exploration program in accordance with 43 CFR 3809.420(b)(8), Kinross would not knowingly disturb, alter, injure, or destroy any scientifically important paleontological remains on federal lands.

Kinross would employ the following EPMs to minimize the loss of significant fossil resources:

- Kinross would retain a paleontologist who is permitted by the BLM and meets the Society of Vertebrate Paleontology's definition for Qualified Professional Paleontologist (Qualified Paleontologist) to carry out the EPMs related to paleontological resources.

- Paleontological monitoring would be conducted during ground-disturbing activities at specific locations identified as having potential for containing scientifically important paleontological resources (PYFC 4 and 5). Monitoring would be conducted by a qualified Paleontological Monitor working under the direct supervision of the Qualified Paleontologist. The Monitor would inspect the area immediately preceding disturbance to ensure any surface fossils are collected.

- If a potential fossil is found, the paleontological monitor would temporarily divert or redirect grading and construction activities in the area of the exposed fossil to facilitate evaluation of the discovery. Kinross would notify the BLM, and leave the discovery intact until notified to proceed by the BLM.

- Fossils encountered and recovered would be prepared to the point of identification, catalogued, and curated at an accredited repository, preferably the Nevada State Museum.

2.1.15.10 Lighting

To minimize effects from portable plant light, lighting would be directed onto the pertinent site only and away from adjacent areas not in use, with safety and proper lighting of the active work areas being the primary goal. Lighting figures would be hooded and down-shielded as appropriate. Kinross would use lighting designed to reduce the impacts to night skies.

2.1.15.11 Livestock and Range

Kinross would protect fences, gates, stock ponds, and other range improvements that may exist within the Plan boundary. Any gates would be left open or closed as appropriate.

2.1.15.12 Fire Prevention

Kinross would comply with applicable agency and state fire laws and regulations. Reasonable measures to prevent and suppress fires within the Project boundaries will be taken by employees, contractors, and subcontractors. No open fires would be allowed within the Project area during the life of the Project.

Welding operations would be conducted on constructed drill sites on mineral soils or in an area otherwise free from vegetation. A minimum of 10 gallons of water and a shovel would be in support vehicles where the welding is occurring to extinguish any fires created from the sparks. Extra personnel would be at the welding site to watch for fires created by welding sparks. Welding aprons would be used when conditions warrant (i.e., during red flag warnings).

Wildland fires would immediately be reported to the Central Nevada Interagency Dispatch Center at (775) 623-3444. Information reported would include the location (latitude and longitude if possible), fuels involved, time started, who or what is near the fire, and the direction of fire spread.

Smoking would only be permitted in areas that are free of flammable materials and only if allowed by state law or federal regulations. If smoking is allowed, smokers would position themselves in such a manner that burning material would fall within cleared areas. Smoking materials would be extinguished by pressing said materials into soils. When completely extinguished, debris associated with smoking would then be put into containers designed solely for this purpose and properly disposed.

Vehicles and equipment operated on public lands and roads would meet proper wildfire preparedness requirements including, but not limited to, being equipped with approved spark arrestors, fire suppression tools, and other appropriate supplies. Power equipment would be equipped with fire extinguishers, buckets, and shovels during the exploration program.

An effective communications network consisting of radios and/or cellular telephones would be in place. Crew vehicles and equipment would be equipped with radios and/or cellular telephones for fire preparedness and prevention, suppression operations, and emergency purposes. Crew vehicles and equipment would also be equipped with an emergency communication list that will include numbers for the administering agency emergency contact.

2.1.16 Reclamation Plan

Drill roads and sites would be reclaimed after sample results are received and it is determined the road or pad is no longer needed for additional phases of the Proposed Action.

The intent would be to reclaim the Project exploration disturbance to conform to the existing beneficial land uses, minimize adverse environmental impacts, and reclaim disturbed areas to ensure visual and functional compatibility with surrounding undisturbed areas.

Growth media salvaged from the disturbed areas would be selectively stripped, stockpiled in the side cast berm material, and replaced during reclamation. Generally, the final surface of backfilled sites and recontoured roads would be left in rough condition to hold seed and to optimize germination. Reclaimed areas would be seeded by hand broadcasting, mechanical broadcasting and harrowing, drill seeding, or hydroseeding and mulching with an approved BLM seed mix. All seed used would be certified weed-free. Seeding would typically occur between the months of September and February to take advantage of the winter/spring moisture.

In the event additional surface disturbance is associated with an extreme storm event due to existing Kinross disturbance, Kinross would repair and recontour any rills or gullying resulting from the event. Straw bales, wattles, and other diversion controls may be utilized to prevent erosion pending revegetation. The affected area would be seeded (hand seeded if the area is not accessible by equipment) using the BLM-approved seed mix. Kinross would be responsible for controlling all noxious weeds in newly disturbed areas until the reclamation activities have been determined to be successful and released by the BLM Authorized Officer.

Reclamation would be completed to the standards described in 43 CFR 3809.420. New temporary roads, in addition to constructed drill sites, would be recontoured to blend with the surrounding area. The area would then be seeded with a BLM-approved certified weed-free seed mix at the appropriate application rate. Seeding would be completed using broadcast methods, then scarified with mechanical equipment, or raked in with hand tools. The reclaimed surfaces would be left in a textured or rough condition. Monitoring would be conducted by Kinross and BLM personnel for a minimum of three growing seasons after reclamation and seeding and may continue past the Project completion date.

During the exploration program, reclamation activities would involve management of drilling procedures to contain cuttings, management of drilling fluids, and keeping work sites clean and safe. In order to avoid post-reclamation subsidence, sumps would be allowed to dry completely

before backfilling. Reclamation of roads and drill sites would be completed to the extent practicable during drilling operations.

No additional measures would be necessary to stabilize temporary disturbances in the event of temporary closure. Regular monitoring would ensure that erosion and sediment control measures are in working order. The following measures would be some of the steps taken during a period of non-operation. Equipment and supplies would either be removed from the site or secured from theft and vandalism. Equipment remaining in operation during the temporary closure, including dozers, excavators, and personal vehicles, would continue to be maintained according to standard procedures. Equipment would be inspected for compliance with appropriate federal and state mining regulations before exploration activities re-commence. Non-hazardous Project-related refuse would continue to be collected in approved trash bins and/or containers and hauled from the site for disposal on a regular basis. Kinross would provide staff as required for maintenance, monitoring, security, and financial guarantee in the event of temporary or seasonal closure. All fuels, lubricants, chemicals, and drilling fluid products would be removed from the Project area at the cessation of construction and/or drilling activities. Interim erosion control measures may include waterbar construction and placement of erosion control barriers as necessary to prevent distribution of silt during periods of project inactivity.

2.2 No Action Alternative

The No Action Alternative is included in this document (40 CFR Part 1502.14(c)) as an alternative carried through for full analysis. Under the No Action Alternative, the Proposed Action would not be approved by the BLM; however, the area would remain available for other multiple use activities as approved by the BLM. Kinross would continue reclamation of previous exploration disturbance on 4.64 acres of public land under its expired mineral exploration Notice NVNV106237934 that is located partially within the proposed Plan boundary (**Figure 4**).

2.3 Alternatives Considered but Eliminated from Detailed Analysis

To be considered for detailed analysis in this EA, potential alternatives had to meet the definition of alternatives described in Section 102(2)(E) of NEPA. A reasonable range of alternatives to the proposed agency action, including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a No Action Alternative that are technically and economically feasible, and meet the purpose and need of the proposal (42 U.S.C. 4332(C)(iii))(iii). The Proposed Action would be located on claims held by Kinross and is therefore limited to the claims they hold and areas where the potential resources have been identified. In addition, access is well established due to previous exploration activities within the Plan boundary. Due to these factors, limited opportunities for alternatives are present.

Based on the criteria for reasonable alternatives, no other alternatives to the Proposed Action and No Action Alternative have been identified or proposed.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL EFFECTS

3.1 Introduction

This chapter presents the existing environment (i.e., the physical, biological, social, and economic values, and resources), the issues analyzed, the effects to the analyzed resources, and Project design features. "Reasonably foreseeable future actions include those federal and non-federal activities not yet undertaken, but sufficiently likely to occur, that a Responsible Official of ordinary prudence would take such activities into account in reaching a decision… Reasonably foreseeable future actions do not include those actions that are highly speculative or indefinite" (43 CFR 46.30).

A project may have some degree of effect upon a resource or concern, but that effect does not always approach a threshold of significance after consideration of short and long-term effects, beneficial and adverse effects, effects on public health and safety, and effects that would violate federal, state, tribal, or local law protecting the environment. Such effects are described as "negligible" in the rationale for dismissal from analysis. The temporal scope for effects includes definitions for the intensity, duration, and context. These definitions are defined in **Table 3-1**.

Table 3-1 Impact Definitions

Element	Term	Status for EA Analysis
Intensity	Negligible	Effects would be so small it would not be measurable or perceptible. Resources would not be significantly altered and there would be no effect on the value or distribution of the resource.
	Minor	Effects would be detectable, measurable, or perceptible, but would occur within the area of analysis and would not affect the overall value or distribution of the resource. Effects would be minimized with implementation of EPMs, BMPs, and reclamation.
	Moderate	Effects would be readily apparent, measurable, large, and of consequence in the area of analysis. Effects may occur to the overall value or distribution of the resource. Mitigation beyond the EPMs and BMPs may be necessary; the effectiveness of these measures would be known.
	Major	Effects would occur and would substantially change the value or distribution of the resource. Mitigation beyond EPMs and BMPs may be necessary; these measures would be anticipated to be effective but would also need to be monitored.
Duration	Temporary	Effects would occur for up to six months or less.
	Short-term	Effects would occur for up to one year.
	Long-term	Effects would occur for the life of the Proposed Action, or beyond one year.
	Permanent	Effects would last after successful reclamation.
Context	Localized	Effects would occur within the area of analysis.
	Regional	Effects would occur within and/or beyond the area of analysis.

In this NEPA analysis, potentially affected resources have been reviewed to determine if they may be significantly impacted by the Proposed Action. The BLM is required to consider specific elements of the human environment (supplemental authorities) that are subject to requirements specified in statute, regulation, or by Executive Order. In addition to resources covered by supplemental authorities that require consideration in NEPA documents, the BLM considers other important resources and uses that may be impacted from the Proposed Action and alternatives.

Table 3-2 lists the resources covered by supplemental authorities and **Table 3-3** lists those resources that are considered additional affected resources.

Each resource was reviewed to determine the potential effects from the Project (i.e., not present, present and not affected, or present and may be affected). Resources identified as Present May be Affected are discussed in the effects analysis. The analysis of effects is disclosed under each affected resource and focuses on potential impacts remaining after the implementation of the EPMs described in Section 2.1.9. **Table 3-2** and **Table 3-3** provide specific sections where details and rationale for determinations of "present, not affected" are discussed.

Table 3-2 Supplemental Authorities

Element	Not Present	Present/Not Affected	Present/May be Affected	Status for EA Analysis
Air Quality			X	Section 3.3.1
Areas of Critical Environmental Concern, National Monument, Wild and Scenic Rivers	X			There are no Special Designation Management Areas Present in or near the Plan boundary.
Cultural Resources		X		Section 3.3.2
Farmlands (Unique or Prime)	X			Not Present in the Plan boundary.
Floodplains		X		Present, Not Affected – See Section 3.2.2
Forest Resources			X	Discussed under Vegetation Resources Section 3.3.10.
Grazing Management		X		Present, Not Affected – See Section 3.2.3
Human Health and Safety	X			Not Present in the Plan boundary.
Migratory Birds			X	Discussed under Wildlife Resources 3.3.14
Native American Concerns			X	Section 3.3.3 Consultation is ongoing
Non-native Invasive and Noxious Species			X	Discussed under Vegetation Resources.3.3.10
Threatened or Endangered Species	X			Not Present in the Plan boundary
Wastes, Hazardous Material/Solid Waste		X		Present, Not Affected - See Section 3.2.5
Water Quality and Quantity			X	See Section 3.3.12
Wetland and Riparian Zones		X		Present, Not Affected – See Section 3.2.6
Wilderness and Wilderness Study Areas, Lands with Wilderness Characteristics		X		Present, Not Effected – See Section 3.2.7

Table 3-3 Additional Affected Resources

Resource	Not Present	Present / Not Affected	Present / May be Affected	Status for EA Analysis
Fire Management		X		Present, Not Affected – See Section 3.2.1
Geology and Minerals			X	See Section 3.3.4
Land Use and Realty			X	Present, Not Affected – See Section 3.3.5
Noise		X		Present, Not Affected – See Section 3.2.4
Paleontological Resources			X	See Section 3.3.6

Resource	Not Present	Present / Not Affected	Present / May be Affected	Status for EA Analysis
Recreation			X	See Section 3.3.7
Socioeconomic Values			X	See Section 3.3.8
Soil Resources			X	See Section 3.3.9
Special Status Species			X	Discussed under Wildlife Section 3.3.14 and Vegetation Resources Section 3.3.10
Transportation and Access	X			Not Present in the Plan boundary
Vegetation Resources			X	See Section 3.3.10
Visual Resources			X	See Section 3.3.11
Wild Horses and Burros			X	See Section 3.3.13
Wildlife Resources			X	See Section 3.3.14

3.2 Resources Not Carried Through for Detailed Analysis

The following resources were determined to be Present, Not Affected by the Proposed Action after data review. A brief discussion of each resource and rationale for dismissal is provided below. These resources are not discussed or analyzed further in this EA.

3.2.1 Fire Management

Kinross would implement EPMs to reduce the risk of wildfire. These would include fire prevention training, recognition of ignition sources, and having vehicles equipped with appropriately sized fire extinguishers and fire prevention tools.

3.2.2 Floodplains

There are no FEMA floodplains mapped within five miles of the Plan or in Esmeralda County (FEMA 2024). There are 33 ephemeral stream drainages and one intermittent stream drainage within the Plan boundary. These drainages flow in response to storm events and if a significant storm event occurs localized temporary flooding may occur adjacent to ephemeral drainages. Since no floodplains are present within the Plan boundary this resource is dismissed from further analysis.

3.2.3 Grazing Management

The Project is in the Montezuma Allotment. No livestock water sources are in the Plan boundary and livestock would not be effected by the temporary disturbance associated with the Proposed Action.

3.2.4 Noise

The Project is approximately six miles west of United States Highway 95, and the Proposed Action is unlikely to add additional sources of noise for human or wildlife above and beyond those that already exist within the Plan boundary, including the authorized Notice-level exploration under Notice NVNV106237934. No residences were identified within a three-mile buffer of the Project (Nexus 2024a).

3.2.5 Waste, Hazardous Material/Solid Waste

The Proposed Action included EPMs to prevent impacts from hazardous and solid waste. These procedures address the use of waste, hazardous or solid. These procedures would promote the safety and awareness of personnel, eliminate, or reduce the potential of releases, and ensure that mitigation, storage, and disposal procedures are required for environmental protection and regulatory compliance.

3.2.6 Wetlands and Riparian Areas

No known riparian areas or wetlands were identified during baseline data collection and field surveys. Based on a spring survey completed for the Project area and a five mile buffer, there are 10 springs approximately 2.5 miles northwest of the Plan boundary (Nexus 2024d). Nine of the springs were dry with no riparian vegetation documented. The survey did document one spring had water flow that was piped and fed a small dirt reservoir. The wet area at the dirt reservoir did not have any riparian vegetation present (Nexus 2024d).

3.2.7 Wilderness/Wilderness Study Areas

There is no Wilderness within or near the Plan boundary. The closest Wilderness Study Areas are the Pinyon Joshua Instant Study Area and the Silver Peak Range, approximately 20 and 24 miles west of the Plan boundary, respectively. There are two areas inventoried for lands with wilderness characteristics within the Plan boundary. The inventories for NV-050-335H and NV-050-336R determined wilderness characteristics were not present; therefore, this resource is not present and is dismissed from further analysis.

3.3 Resources Carried Through for Detailed Analysis

3.3.1 Air Quality

The area of analysis for air quality is the area within the Plan boundary.

3.3.1.1 Affected Environment

Ambient air quality and the emission of air pollutants are regulated under both federal and state law and regulations under the Clean Air Act. Regulatory air standards that are potentially applicable to the Project include the National Ambient Air Quality Standards and the Nevada Ambient Air Quality Standards (NVAAQS). The BAPC is responsible for administering air quality permit programs (NAC 445B.001 through 445B.3791, inclusive) as well as the NVAAQS. The BAPC is additionally responsible for the Prevention of Significant Deterioration Program, enforcing the New Source Performance Standards, and implementing the Federal Operating Permit Program (Title V).

Activities such as fossil fuel combustion, deforestation, and other changes in land use are resulting in the accumulation of greenhouse gases (GHG), such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), water vapor, and industrial gases (e.g., Fluorine gases, or F-gases), in the atmosphere. Global GHG emissions are estimated using a CO_2-equivalent (CO_2e) 100-year Global Warming Potential index which combines CO_2, CH_4, N_2O, and F-gases for establishing a single

comparable metric (IPCC 2014). Sources of GHG emissions in the vicinity of the Project include wildfires, vehicles, and mineral and energy development.

Over the past 100 years, the weather, vegetation cover, and wildfire regimes of the Central Basin and Range ecoregion have changed, suggesting a change in climate regime (Comer et al. 2012). The nearest climate data documented over the past 20 years is the Tonopah Airport with an annual precipitation of 4.8 inches, with temperatures averaging 76 degrees Fahrenheit (°F) in July and 34°F in January (NWS 2023). In 2021, Tonopah experienced 13 days with 100°F or higher temperatures. This was a substantial increase from the previous record of eight days over 100°F days set in 2013 (NWS 2024). These changes have been expressed in species composition and changes in vegetation communities. The amount of warming that Nevada would face in the future depends on whether GHGs continue to grow or whether they are reduced rapidly over the coming decades. Projections of warming range from 4°F to 6°F throughout Nevada in the next few decades. Potential effects to Nevada as a result of the warming climate include decreasing snowpack, an increase in water demand, a decrease in water supply, a decrease in agricultural productivity, an increase in the severity and frequency of wildfires, an increase in pests, and effects to human health (McAfee et al. 2021).

3.3.1.2 Environmental Consequences

Proposed Action

Project-related activities including travel on access roads and operations would create emissions that would have a potential effect on air quality. The potential emissions inventory analyzed the Proposed Action emissions include drilling, road development, use of generators, and vehicle traffic. Emissions were based on equipment identified by Kinross, agency, state, federal, or otherwise accepted emission factors, and the Proposed Action timeline (Trinity 2024). The emissions inventory included calculating total suspended particulate (TSP), particulate matter 10 microns or less in diameter (PM_{10}), particulate matter 2.5 microns in aerodynamic diameter or less ($PM_{2.5}$), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO_2), volatile organic compounds (VOC), and hazardous air pollutants (HAPs) (**Table 3-4**).

Emissions would occur any time the internal combustion engines on the vehicles and equipment are operating. An emissions inventory was performed using United States Environmental Protection Agency (USEPA) Air Pollution 42 emission factors. The emissions that would be generated by the Proposed Action were compared to the USEPA's significant emission rate (40 CFR 52.21) to determine the Proposed Action effects to air quality. The calculated tons of emissions for the above identified pollutants as well as the USEPA's significant emissions rates are provided in **Table 3-4**.

Maximum yearly predicted emissions for most pollutants generated from the Proposed Action would be below the USEPA's significant emission rates. Emissions for two pollutants, CO and NO_x could exceed the 25-ton per year threshold established by NDEP (2024a). However, because the emissions would be spread over different areas of the Plan boundary during phased surface disturbance of 250 acres over 10 years within the Plan boundary of 5,672 acres, it is not expected that air quality or National Ambient Air Quality Standards attainment would be affected in a discernable way by the Proposed Action.

Table 3-4 Fugitive Dust and Combustion Emissions Associated with the Proposed Action

Sources	Emission Type (tpy)								
	TSP	PM_{10}	$PM_{2.5}$	CO	NO_x	SO_2	VOC	HAPs	[1]GHG (CO_2e)
Equipment Point Source	0.79	0.79	0.74	123.76	37.88	1.55	3.88	0.07	3935.11
Drilling and Roads – Fugitive Dust	15.61	4.26	0.85						
Total	**16.39**	**5.04**	**1.59**	**123.75**	**37.88**	**1.55**	**3.88**	**0.07**	**3,935.11**

Source: Trinity 2024
tpy = tons per year
[1] The GHG emissions are provided as carbon dioxide equivalent (CO_{2e}).

All exploration activities with Surface Area Disturbance exceeding five acres are required to obtain a Surface Area Disturbance permit from the BAPC to ensure that fugitive dust emissions are minimized to the maximum extent possible using a Dust Control Plan. The Dust Control Plan stipulates that travel on roads within the Plan boundary be conducted at prudent speeds and include watering roads to suppress dust, as necessary, to minimize the potential effects on air quality. The emissions associated with the Proposed Action would occur in a rural area where minimal emissions are generated from other activities. Effects to air quality would be negligible, short-term, and localized.

The Proposed Action would result in emissions of GHGs. Use of heavy equipment, light and heavy vehicles, and drill rigs within the area of analysis would produce GHGs through combustion of fossil fuels during exploration and reclamation. Total GHG emissions for the Proposed Action are estimated to be 3,935 tpy with CO_2 being the primary contributor. This would be the equivalent to 850 gasoline powered passenger vehicles driven for one year (USEPA 2024). For 2021, Nevada's gross GHG emissions totaled 45.381 $MMTCO_{2e}$ (NDEP 2023). The Proposed Action would generate approximately 0.008 percent of the gross GHG emissions generated in the state of Nevada. Effects to GHG would be negligible, short-term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would complete reclamation for previous exploration activities on up to 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.2 Cultural Resources

The area of analysis for Cultural Resources is the Plan boundary.

3.3.2.1 Affected Environment

Archaeology is the study of the human past through the excavation and analysis of artifacts and other physical remains. Within the Class III cultural resource survey area, a total of 375 archaeological sites were documented; of these resources, 303 are not eligible, 40 are unevaluated, and 32 are eligible for inclusion on the National Register of Historic Places (NRHP). Additionally,

337 isolated finds were documented, and three of the isolated are unevaluated for NRHP inclusion (Kautz 2024).

3.3.2.2 Environmental Consequences

Proposed Action

Phase activities are proposed on approximately 250 acres within the 5,672-acre Plan boundary. All areas associated with Phase I have been included in the cultural survey and roads and drill pads have been placed to achieve avoidance of eligible or unevaluated cultural resources. As additional phases of drilling proceed, additional cultural surveys will be completed in coordination with the BLM. While conducting disturbance activities within 30 meters of an eligible site wherein subsurface potential has been indicated on the site formation, Kinross would have an archaeological monitor present per EPMs (Section 2.1.15.8). The Proposed Action includes avoidance of cultural resources based on surveys. EPMs also include notification to tribes prior to construction so the tribes could provide tribal monitors during construction if desired (Section 2.1.15.8). Effects to cultural resources would be negligible, short term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.3 Native American Religious and Cultural Concerns

3.3.3.1 Affected Environment

The area of analysis is the Plan boundary and is located within the traditional territory of the Western Shoshone, and may contain spiritual, traditional, and cultural resources, and sites to engage in social practices that aid in maintaining and strengthening the social, cultural, and spiritual integrity of the Tribes. Recognized Tribes with known interests near the Project include the Timbisha Shoshone Tribe, the Yomba Shoshone Tribe, the Fort Independence Paiute Tribe, the Walker River Paiute Tribe, and the Duckwater Shoshone Tribe. The BLM TFO initiated government-to-government consultation with the Timbisha Shoshone Tribe, the Fort Independence Paiute Tribe, the Walker River Paiute Tribe, the Yomba Shoshone Tribe, and the Duckwater Shoshone Tribe, for the Project on December 17, 2024.

Social activities of Native Americans continue to define places of cultural importance across lands currently administered by the BLM. Some Western Shoshone maintain cultural, spiritual, and traditional activities, visit their sacred sites, hunt game, and gather available medicinal and edible plants. Through oral history (the practice of handing down knowledge from the elders to the younger generations), some Western Shoshone continue to maintain a world view similar to that of their ancestors.

In accordance with the National Historic Preservation Act (Public Law [P.L.] 89-665), the NEPA, the FLPMA (P.L. 94-579), the American Indian Religious Freedom Act of 1978 (P.L. 95-341), the

Native American Graves Protection and Repatriation Act (P.L. 101 601) and Executive Order 13007, the BLM must provide affected Tribes an opportunity to comment and consult on the proposed Project. The BLM must attempt to limit, reduce, or possibly eliminate any negative impacts to Native American traditional/cultural/spiritual sites, activities, and resources.

No cultural, traditional, spiritual sites or activities of importance to Tribes have been identified in the area of analysis. There is a cultural EPM for notification to tribes prior to construction so the tribes could provide tribal monitors during construction if desired (Section 2.1.15.8). However, Tribal consultation is ongoing, and as part of the consultation process, this EA would be provided to the tribes for review and comment.

3.3.3.2 Environmental Consequences

Proposed Action

Various Tribes and Bands of the Western Shoshone have stated federal projects and land actions might have widespread effects to their culture and religion as they consider the landscape as sacred and as a provider. Various locations throughout the TFO administrative area host certain traditional, spiritual, and cultural activities today, as in the past. Traditional Cultural Properties, designated by the Tribes, are not known to exist in or within the vicinity of the Plan boundary. The TFO continues to solicit input from local tribal entities. The TFO is continuing to coordinate with the Tribes to identify any other sites or artifacts, or cultural, traditional, and spiritual use resources and activities that might experience an impact.

At this time, no impacts related to Native American Religious and Cultural Concerns have been identified by the Tribes and are not anticipated from the Project. However, Tribal consultation would continue throughout the life of the Project.

No Action Alternative

Under the No Action Alternative, the Project would not be approved by the BLM; however, the area would remain available for other multiple use activities. Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. At this time, no impacts related to Native American Religious and Cultural Concerns have been identified by the Tribes for current activity in the area of analysis.

3.3.4 Geology and Minerals

The area of analysis is the Plan boundary.

3.3.4.1 Affected Environment

The majority of the area within the Plan boundary consists of rhyolite. Rhyolite is a volcanic rock that is light in color. In addition to the rhyolite, Deep Spring formations are present in the northwest portion of the Plan boundary. These formations are primarily made of up dolostone, sandstone and limestone. Small amounts of quaternary alluvial deposits are found in the western portion of the Plan boundary (PaleoWest 2024).

3.3.4.2 Environmental consequences

Proposed Action

The Proposed Action would not involve the removal of large quantities of earth that may potentially lead to structural instability. Only a small amount of material would be removed from drill holes and would not affect potential mineral resources in the ground. Compared to the overall ore deposition in Esmeralda County and Nevada, the amount of minerals extracted as a result of the proposed exploration activities is in effect miniscule and would have a negligible, temporary, localized impact.

No Action Alternative

Under the No Action Alternative, the Project would not be approved by the BLM; however, the area would remain available for other multiple use activities. Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities.

3.3.5 Lands and Realty

The area of analysis is the Plan boundary.

3.3.5.1 Affected Environment

The area of analysis overlaps three ROWs. NV Energy has a permanent Greenlink 200-foot linear 525-kilovolt (kV) transmission line (NVNV105844735) and a temporary construction corridor authorized until 2030 (NVNV105848004) that runs through the center of the area of analysis (BLM 2024a). The Department of Energy has an active ROW (NVNV106078436) for the Western Area Power Administration for a 200-foot linear 1,000-kV transmission line that runs through the southwest portion of the area of analysis as well as a pending application for an electric distribution line (NVNV106035748) (BLM 2025a).

3.3.5.2 Environmental Consequences

Proposed Action

The Project would be constructed on lode claims owned, leased, or controlled by Kinross. The Proposed Action would overlap three active ROWs. There may be overlap during construction of the Greenlink ROW; however, this ROW would not affect any mining claims or entries unless the presence of the line limits access to develop the claim or occurrence during construction. This is not anticipated to materially interfere with prospecting or mining operations because the Greenlink ROW is not expected to preclude or restrict access to minerals resources or prevent the development of mineral resources (BLM 2024a). The BLM would review Kinross work plans as they are submitted to determine if coordination with NV Energy, or other ROW holders, is needed. Effects to lands and realty would be negligible, temporary, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be

similar to those described for the Proposed Action, including overlap with the ROWs, but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.6 Paleontological Resources

The area of analysis for paleontological resources is the Plan boundary.

3.3.6.1 Affected Environment

The Proposed Action is in the Great Basin region of the basin and range geomorphic province of Nevada (PaleoWest 2024). The basin and range topography is a result of regional extension resulting in normal faulting, block rotation, volcanism, and crustal thinning. The Project lies within the Montezuma Range, part of a series of northeast–southwest trending mountain ranges and valley fills that have formed as a result the basin and range crustal extension and recently (approximately 1–4 million years ago) affected by the lateral movement of the Sierra Nevada fault system (Lee et al. 2001).

Quaternary alluvial deposits and Miocene volcanic units (Tar, Taf) have not produced fossil localities in the Plan boundary or vicinity and the resource potential for these is low to very low (Potential Fossil Yield Classification [PFYC] Class 1-2). The Ediacaran Cambrian Deep Spring Formation has produced significant fossil resources in Nevada and has high potential (PFYC Class 4) for yielding significant paleontological resources in the future (PaleoWest 2024). During a recent survey two nonsignificant trace fossils were recorded in this formation (PaleoWest 2024).

3.3.6.2 Environmental Consequences

Proposed Action

The Proposed Action would result in disturbance of geologic units with varying paleontological potentials. Approximately 96 percent (5,428 acres) of the Proposed Action would be underlain by geologic units with low to very low (PFYC 1 and 2) paleontological potential and approximately four percent (244 acres) of the Proposed Action would be underlain by geologic units with high (PFYC 4) paleontological potential. It is unlikely that exploration activities would encounter paleontological resources in units with very low or low paleontological potential geologic units. There is a higher potential for exploration activities to effect paleontological resources in the high potential geologic unit, however, this is a minor portion of the Plan boundary. The EPMs, including training and monitoring in high potential units, would reduce the effects and may result in new scientific knowledge of the paleontological resources if fossils were to be encountered and recorded. With the implementation of the EPMs, effects to paleontological resources would be negligible, permanent if encountered, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities.

With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.7 Recreation

The area of analysis is the Plan boundary.

3.3.7.1 Affected Environment

Recreational uses of the public land in the vicinity of the area of analysis consist primarily of dispersed recreational activities including camping, hiking, motorcycle and off-highway vehicle (OHV) use, horseback riding, hunting, rockhounding, photography, rock climbing, nature study, wildlife/wild horse/burro viewing, and picnicking. There are Special Recreation Permitted (SRPs) routes that cross through the Plan boundary. The area of analysis is located within NDOW Hunt Unit 212 (NDOW 2023). Hunting of antelope, mule deer, and desert bighorn sheep occurs in this unit, as well as game birds. In the area of analysis, public access is limited to existing roads and trails in the areas designated with OHV restrictions (BLM 1997).

3.3.7.2 Environmental Consequences

The Proposed Action would affect up to 250 acres of public land throughout the life of the Project. Existing roads and trails within the Plan boundary would still be available for public use including SRPs, although road access may be restricted during active operations for safety. Work plans for each phase would identify where active operations would be planned within the Plan boundary and the BLM could identify other planned activities that need to be coordinated with Kinross to maintain public access and safety, such as SRP events. Hunting within the Plan boundary may be impacted since big game animals may avoid active areas. As a result, hunters would follow these animal populations into surrounding areas. Impacts to recreation would be negligible, short-term, and localized.

3.3.8 Socioeconomic

The area of analysis for socioeconomic values is Esmeralda and Nye counties.

3.3.8.1 Affected Environment

In 2021, the total population of the area of analysis was 51,083. The area population increased by 6,313 people during the period of 2010 to 2021 (14.1 percent). This is compared to the state of Nevada over the same period with 16.2 percent increase of population change (USCB 2022b). Both counties had a decrease in population due to natural change (births and deaths), and an increase due to migration. Esmeralda County is a largely rural county and has trailed the statewide growth rate by a substantial margin for two decades.

In Esmeralda County, where the Project would be located, the primary economic driver is mining. Within the area of analysis, the average annual unemployment rate was 5.7 percent in 2022, which was lower than the state of Nevada at 7.2 percent. Nye County has a more diverse economy with employment in trade, transportation, utilities, and professional and business services employing a higher percentage of the population than Esmeralda County. This is likely due to the urbanized character of the southern part of Nye County compared to the more rural area around Tonopah. Average wages and salaries from mining are the highest for any industry in Nevada. Within the

non-service sector mining, including fossil fuels, (1,337 jobs) and construction (988 jobs) were the largest employers in the counties (USCB 2022a). Although mining wages and salaries typically are higher than the state average, per capita personal incomes in the area of analysis indicate mining wages are not always distributed to substantially raise county-wide income levels. Both counties have a higher percent of individuals below the poverty level than the state as a whole.

Temporary workers typically choose a residence location based on a combination of job proximity, housing availability, and access to public and private services. Much of the workforce in Esmeralda County reside in Goldfield and the workforce in Nye in Tonopah, Pahrump, or Beatty, Nevada primarily because they are the most accessible communities with a modest selection of services and housing. Based on Tonopah and Goldfield's websites, there are 11 hotels and a recreational vehicle (RV) Park in Tonopah, and three hotels and two RV parks in Goldfield (Nexus 2024c). The majority of the workforce at Esmeralda County mines reside in the Tonopah vicinity primarily because it is the most accessible community with a modest selection of services and housing. Some workers may choose to live in other communities within Esmeralda County, depending on housing availability.

Local government finance in Nevada is a complex admixture of locally derived and state-shared revenues. Local revenues primarily are derived from ad valorem property taxes on real and personal property (e.g., business equipment, agricultural equipment, etc.), and the net proceeds of mines in the jurisdiction. Esmeralda County has limited revenue sources, whereas Nye County as a whole. operates a much larger budget due to a larger population near the Las Vegas area. Government services include volunteer fire departments in both counties that provide emergency medical and ambulance transport services. There is one operating Class II public landfill (NDEP 2024b).

In general, the two counties are largely rural, with economies based primarily on mining and agriculture, and some tourism. Residents in these counties often value independence and enjoy being outdoors. Public lands in the area of analysis are used for economic income and recreation activities. These activities are important aspects to living within the area of analysis and valued by residents (UNRE 2021, 2022).

3.3.8.2 Environmental Consequences

Proposed Action

Due to the amount of public land in the area of analysis, BLM decisions have a relatively large effect on local economic activity, quality of life, and local access to public land resources. The life of the Project is 10 years and based on number of drill rigs would utilize up to 60 contractors for road construction and drilling operations. Construction-related projections would include either workers employed with drilling companies already located in Esmeralda or Nye, or other nearby communities, and younger workers without Bachelor's degrees who would reside in temporary quarters, such as motels or RV parks during the work week and return to permanent residences elsewhere when not actively working. Although construction workers would be a temporary increase; overall, the impacts of population increase of up to 60 employees would not be a noticeable change when spread throughout the surrounding communities.

The Project could employ up to 60 workers at one time, contributing less than 0.21 percent based on 28,511 people working within the area of analysis. Due to proximity and number of services,

Tonopah is most likely to provide commercial services to workers from the Project. Needs for the Project would include fuel for 30 vehicles and lodging and food services for up to 60 workers. Each of the other communities may experience occasional impacts when workers are traveling through these communities. Tonopah has sufficient lodging and other services to meet the demand from workers at this Project. During peak tourism and certain events, such as Jim Butler Days, lodging may be limited for a short time period of time, primarily on weekends. Assuming most construction workers would be non-local, they would place a demand on local, temporary housing resources.

Project employees may support local businesses (primarily in Tonopah) and may generate additional sales and use tax receipts from the purchase of equipment, supplies and construction materials needed for the Proposed Action. Also, the Proposed Action would purchase water from a water hauling contractor for operational use and dust suppression and would not affect municipal water within the area of analysis. Solid wastes would continue to be disposed of in a state, federal, or local designated landfills. Because of the low number of contractors to be hired, the impacts are not expected to be of a noticeable level. Impacts to socioeconomics by the Proposed Action would be negligible, short-term and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.9 Soil Resources

The area of analysis is the Plan boundary.

3.3.9.1 Affected Environment

The Plan boundary is located predominately in extremely gravelly loam and gravelly fine sandy loam, 38.3 percent and 25.2 percent, respectively. These soils tend to be well drained with a moderate to very high runoff rate and with medium potential for soil compaction. The majority of the soils have moderate resilience, indicating that the soil is generally favorable for recovery from disturbance. None of the soil associations in the Plan boundary are classified as prime farmland (NRCS 2023) (**Table 3-5**).

Table 3-5 Soils in Plan boundary

Soil Type	Acres within Plan Boundary	Percent of Plan Boundary
Extremely gravelly loam	2,177	38%
Gravelly fine sandy loam	1,429	25%
Very fine sandy loam	930	16%
Very cobbly fine sandy loam	473	8%
Gravelly sandy loam	341	6%
Very cobbly loam	180	3%
Very gravelly sandy loam	118	2%

Soil Type	Acres within Plan Boundary	Percent of Plan Boundary
Fine sandy loam	29	1%
Total	**5,677**	**100.0%**

Source: NRCS 2023

3.3.9.2 Environmental Consequences

Proposed Action

The Proposed Action would have impacts to soil resources within the area of analysis. Up to 250 acres of soil would be affected by disturbance including compaction in areas where equipment and vehicles travel and operate, soil horizon and structure disturbance from exploration activities, and resultant exposure to erosive forces. Other potential effects to soil resources may include off-site dust generation, as well as off-site wind- or water-based erosion. EPMs, including dust suppression and proper drainage implemented, would lessen these impacts. All disturbance would be reclaimed with excavated soils placed back over disturbed areas and reseeded to restabilize the soils. The effects of the Proposed Action would be negligible, long-term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.10 Vegetation Resources including Forest Resources, Sensitive Species, and Non-Native Invasive and Noxious Species

The area of analysis for vegetation, including special status species, is the Plan boundary. The area of analysis for noxious and invasive weeds is the Plan boundary and the primary travel route to the Plan boundary.

3.3.10.1 Affected Environment

Eight vegetation communities (**Figure 5**) with associated habitat types (**Table 3-6**) occur within the area of analysis.

Table 3-6 SWReGAP Vegetation Communities

SWReGAP Cover Type	Associated NDOW WAP Habitat Type Key	*Approximate Acres within Plan Boundary	Percent of Total Acreage within Plan Boundary
Great Basin Pinyon-Juniper Woodland	Pinyon/Juniper	868	15%
Great Basin Xeric Mixed Sagebrush Shrubland	Sagebrush	2,143	38%
Inter-Mountain Basins Big Sagebrush Shrubland	Sagebrush	1,259	22%
Inter-Mountain Basins Cliff and Canyon	Cliff and Canyon	40	1%
Inter-Mountain Basins Mixed Salt Desert Scrub	Salt Desert Scrub	1,111	20%
Inter-Mountain Montane Sagebrush Steppe	Sagebrush	4	<1%
Inter-Mountain Basins Semi-Desert Shrub Steppe	Salt Desert Scrub	249	4%

SWReGAP Cover Type	Associated NDOW WAP Habitat Type Key	*Approximate Acres with Plan Boundary	Percent of Total Acreage within Plan Boundary
Invasive Annual Grassland	Not Applicable	2	<1%
	Total	**5,676**	**100%**

Sources: USGS 2007; NDOW 2013; Nexus 2024d
*Acres are rounded to the nearest whole acre
SWReGAP = Southwest Regional Gap Analysis Project

Ten ecological sites were identified in the Plan boundary (**Table 3-7**).

Table 3-7 Ecological Sites within Plan Boundary

Ecological Site ID	Ecological Site Name	Dominate Vegetation	*Acres	Percent
R029XY008NV	Shallow calcareous loam 8-12 P.Z.	Black sagebrush (*Artemisia nova*) Indian ricegrass (*Oryzopsis hymenoides*) Needle-and-thread grass (*Hesperostipa comata*) Galleta grass (*Pleuraphis jamesii*) Fourwing saltbush (*Atriplex canescens*)	3,840	68
R029XY014NV	Shallow calcareous slope 8-12 P.Z.	Black sagebrush Indian ricegrass Galleta grass	930	16
F029XY069NV	Pimo-juos 12-16 P.Z.	Single-leaf pinyon (*Pinus monophyla*) Utah juniper (*Juniperus osteosperma*) Muttongrass (*Poa fendleriana*).	418	7
R029XY006NV	Loamy 8-10 P.Z.	Shadscale (*Atriplex confertifolia*) Indian ricegrass Galleta grass	341	6
R029XY036NV	Cobbly loam 5-8 P.Z.	Spiny menodora (*Menodora spinescens*) Indian ricegrass Galleta grass	117	2
R029XY042NV	Coarse Silty 5-8 P.Z.	Fourwing saltbush Winterfat (*Krascheninnikovia* lanata) Indian ricegrass	29	1
		Total	**5,676**	**100**

Source: Nexus 2024d
*Acres are rounded to the nearest whole acre

No noxious weeds were identified during 2023 surveys within the Plan boundary. One invasive species, bull thistle (*Cirsium vulgare*), was located inside the Plan boundary at two different locations. Other invasive species that are common throughout the area and may be present are cheatgrass, halogeton, and Russian thistle.

Two sensitive plants, Joshua tree and Pahute Mesa beardtongue, are within the Plan boundary. Surveys conducted in 2023, documented one Pahute Mesa beardtongue species, and an estimated 16,730 living Joshua trees within the Plan boundary (Nexus 2024d).

Native plants found within these ecological sites would still be available as forestry resources for seed collection, biomass, and transplanting.

3.3.10.2 Environmental Consequences

Proposed Action

The Proposed Action would impact 250 acres of vegetation over a 10-year period. The disturbance could occur anywhere within the Plan boundary and includes removing vegetation and topsoil to construct drill sites and access roads. There would also be overland travel that would crush vegetation. Reclamation would reduce these impacts by recontouring topsoil over disturbance and reseeding the disturbances with BLM approved seed mixes. Reclamation goals for disturbances would be to: 1) stabilize the site, and 2) establish a productive community based on the applicable land use plan and designated post mining land uses. To meet these goals, a reclaimed desired plant community made up of a perennial plant community established on a disturbed site which contributes to stability and produces that type and amount of vegetation necessary to meet or exceed both the land use and activity plan objective established for the site. The revegetation release criteria for reclaimed sites would be to achieve as close to 100 percent of the perennial plant cover of selected comparison areas as possible (NDEP 2016).

Although reclamation would reduce impacts to vegetation, it may take several years for mature plants to reestablish and there would be a potential for non-native invasive species to establish. Noxious weeds may have an impact if they are transported in and out of the Plan boundary by various equipment. EPMs would be implemented to reduce the introduction of noxious weeds and those weeds identified within the 250 acres of disturbance would be treated to prevent spread. Within the Project area, availability of forestry resources for collection through the forestry permitting process would be dependent on the areas of disturbance and if collection were a compatible use alongside the proposed exploration activities.

Removal of sensitive species would be avoided whenever possible. If removal cannot be avoided, Kinross would comply with State of Nevada regulations to mitigate impacts to cacti, including Joshua trees, and commit to pay for healthy Joshua trees through a Contract for the Sale of Vegetative Resource with the BLM.

Reclamation and the EPMs in the Proposed Action would be implemented to minimize the spread of noxious weeds/invasive species, reduce effects to vegetation and avoid impacts to special status species. Effects from the Proposed Action to the vegetation resources including sensitive species, forestry resources, and non-native and noxious weeds would be minor, long-term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres and other land uses would continue to occur. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.11 Visual Resources

3.3.11.1 Affected Environment

The Proposed Action is located in Visual Resource Management Class (VRM) IV. VRM IV allows for management activities to result in major modification of the existing character of the landscape. The Plan boundary is located in a landscape that has been modified by previous mineral exploration activities.

3.3.11.2 Environmental Consequences

Proposed Action

The Proposed Action would result in construction of temporary roads, drill pads, and a laydown area, and conduct drilling activities throughout the Plan boundary within VRM Class IV areas. These activities would result in modification to the characteristic landscape and there would be no alternation to the visual value of the landscape. Kinross would implement EPMs to reduce disturbance through reclamation and would implement lighting designed to reduce the impacts to night skies. The Project is consistent with VRM Class II objectives. The effects from the Proposed Action to visual resources would be negligible, short-term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.12 Water Resources, Quality and Quantity

The area of analysis for water resources is the Plan boundary with a five-mile buffer.

3.3.12.1 Affected Environment

No surface water sites were identified within the Plan boundary. Ten springs/seeps were identified within the five-mile buffer, locations and status of each of these springs/seeps are shown in **Table 3-8**. One spring, W10, has been developed and piped to a partially rocked indentation on the ground. The water right for this development is 0.0005 cubic feet per second for livestock use (NDWR 2024a) with approximately 0.16 gallon per minute flow in 2023 (Nexus 2024e).

Table 3-8 Spring and Water Right Information

Identification	Water Right Number	Duty (acre-feet)	Spring Status	Location from Plan Boundary
Slaughterhouse Spring	NA	NA	Dry	Approximately 5 miles northeast of the Project boundary
Sulphur Spring A	NA	NA	Dry	Approximately 3 miles northeast of the Project boundary
Sulphur Spring B	NA	NA	Dry	Approximately 3 miles northeast of the Project boundary

Identification	Water Right Number	Duty (acre-feet)	Spring Status	Location from Plan Boundary
Dago Joe Spring	NA	NA	Dry	Approximately 2.85 miles north of the Project boundary
Brickyard Spring	4309	0.0	Dry	Approximately 2.80 miles north of the Project boundary
W2	13604	[1]3.59	Dry	Approximately 4.52 miles northeast of the Project boundary
W3	NA	NA	Dry	Approximately 3.1 miles northeast of the Project boundary
W5	NA	NA	Dry	Approximately 3.1 miles northeast of the Project boundary
W9	13604	[1]3.59	Dry	Approximately 4.41 miles northeast of the Project boundary
W10	13604	[1]3.59	Low flow	Approximately 4.41 miles northeast of the Project boundary
Montezuma Tunnel	29176	23.81	*	Approximately 1.49 miles north of the Project boundary
Unnamed Well	22691	16.3	NA	Approximately 4.76 miles northeast of the Project boundary
Unnamed Spring	11112	1.1	*	Approximately 4.74 miles northeast of the Project boundary
Unnamed Spring	27309	181.0	*	Approximately 4.47 miles north of the Project boundary
Unnamed Well	10049	55.7	NA	Approximately 5.66 miles north of the Project boundary
Unnamed Well	13113	5.0	*	Approximately 5.0 miles northeast of the Project boundary
Unnamed Well	82711	161.3	NA	Approximately 5.34 miles northeast of the Project boundary

[1] Water right duty is a combination of W2, W9, and W10, known as West Spring

* Site not visited in the field or discussed further as spring or well is located on private land or permission to sample/visit was not gained.

There are currently no wells drilled within the Plan boundary. The closest groundwater well is approximately 4.6 miles from the north edge of the Plan boundary. Information for wells with associated water rights within the five-mile Project boundary radius is included in **Table 3-8**.

3.3.12.2 Environmental Consequences

Proposed Action

No springs/seeps are present within the Plan boundary, therefore. no disturbance would occur within close proximity. There would be no impacts to riparian areas and associated vegetation since none is present.

Up to 10 monitoring wells would be drilled within the Plan boundary. The monitoring wells would be completed with a nominal four-inch-diameter drilled to approximately 2,000 feet deep. A NDWR waiver would be obtained following the requirements of NAC 543.441 for each monitoring well before construction. Minimal water would be extracted from the monitoring wells with a negligible impact on the groundwater source in the area.

Water use is proposed at 10,000 to 15,000 gallons per day. Since operations could occur yearlong, this assumes maximum annual consumption of 100 acre-feet. During Phase I of the Proposed

Action, water would be hauled from Goldfield and temporarily stored in a 20,000-gallon holding tank. This is less than what is currently authorized, 719.98 annual acre feet, in Esmeralda County for municipal use (NDWR 2024b). The Proposed Action also includes drilling a water supply well within the Plan boundary (**Figure 3**) to supply fresh water to support drilling operations. The water well (as identified through future work plans) would be drilled in compliance with NAC 534 to reduce sediment, control stormwater, and manage drilling fluids. This would prevent degradation to water quality. An NDWR waiver would be obtained following the requirements of NAC 534.442. Based on the waiver requirements this well would be temporary and only used for the Project. Since the Proposed Action water use would be less than the currently authorized water allocations determined by the state of Nevada and follow applicable regulations to prevent impacts to water quality, effects to groundwater quality and quantity would be negligible, short-term, and localized.

Exploration drilling may also impact groundwater. Drilling would occur at depths of up to 2,500 feet and would pass through the groundwater table, so there would be the possibility of fluid contact with groundwater. This possibility would be reduced by casing and cementing the drill holes to prevent the vertical movement of groundwater down the hole. The Proposed Action would abandon all drill holes in accordance with state regulations thus reducing potential impacts to water resources to negligible, short-term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.13 Wild Horses and Burros

The area of analysis is the Plan boundary.

3.3.13.1 Affected Environment

The area of analysis is the Plan boundary and within the Montezuma Peak Herd Management Area (HMA). This HMA is approximately 76,437 acres of public land, and 1,439 acres of a mix of private and other federal lands. The appropriate management level ranges from two to four wild horses and six to 10 burros (BLM 2024b). The estimated population in 2023 was 122 wild horses and 184 burros (BLM 2024b).

3.3.13.2 Environmental Consequences

Proposed Action

The Proposed Action includes disturbance of 250 acres of public land and increased human activity in the area of analysis. Up to 250 acres of vegetation would be temporarily removed from wild horse (*Equus ferus*) and burro (*Equus asinus*) use, which is approximately 0.003 percent of the HMA. All disturbance would be reclaimed. There are no surface water sources in the Plan boundary available for wild horse and burro use. There would be a potential for individual wild

horses or burros to be injured or killed by the increased amount of traffic. This impact would be reduced through EPMs for speed limits within the Plan boundary. Effects would be a negligible, long-term, and localized.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

3.3.14 Wildlife, including Migratory Birds, Special Status Species, and Threatened and Endangered Species

The area of analysis for Fish and Wildlife is the Plan boundary including migratory birds and all special status species except golden eagle (*Aquila chrysaetos*). The area of analysis for golden eagle is the Plan boundary and four-mile buffer.

3.3.14.1 Affected Environment

General Wildlife including Migratory Birds

Within the areas of analysis, 32 wildlife species were documented during baseline surveys in 2023 (**Table 3-9**). Additionally, other wildlife species have the potential to occur in the areas of analysis or have been documented as observed in the Plan boundary during coordination with United States Fish and Wildlife Service (USFWS) and NDOW (**Table 3-10**).

Table 3-9 Wildlife Species Observed in the Areas of Analysis During 2023 Baseline Surveys

Scientific Name	Common Name	Status
Mammals		
Antilocapra americana	Pronghorn antelope	Nevada Game Species
Odocoileus hemionus	Mule deer	Nevada Game Species
Canis latrans	Coyote	-
Lepus californicus	Black-tailed jackrabbit	-
Lasiurus blossevillii	Western red bat	BLM Special Status Species
Lasiurus cinereus	Hoary bat	BLM Special Status Species
Lasionycteris noctivagans	Silver-haired bat	BLM Special Status Species
Myotis californicus	California myotis	BLM Special Status Species
Myotis ciliolabrum	Western small-footed myotis	BLM Special Status Species
Myotis lucifugus	Little brown myotis	BLM Special Status Species
Myotis velifer	Cave myotis	BLM Special Status Species
Myotis volans	Long-legged myotis	BLM Special Status Species
Myotis yumanensis	Yuma myotis	BLM Special Status Species
Parastrellus hesperus	Canyon bat	BLM Special Status Species
Tadarida brasiliensis	Mexican free-tailed bat	BLM Special Status Species

Scientific Name	Common Name	Status
Reptiles		
Gambelia wislizenii	Long-nosed leopard lizard	-
Phrynosoma platyrhinos	Desert horned lizard	-
Sceloporus occidentalis	Western fence lizard	-
Sceloporus graciosus	Common sagebrush lizard	-
Crotalus cerastes	Sidewinder rattlesnake	
Birds		
Amphispiza bilineata	Black-throated sparrow	Migratory Bird
Catherpes mexicanus	Canyon wren	-
Salpinctes obsoletus	Rock wren	Migratory Bird
Haemorhous mexicanus	House finch	Migratory Bird
Myiarchus cinerascens	Ash-throated flycatcher	-
Empidonax wrightii	Gray flycatcher	Migratory Bird
Sialia currucoides	Mountain bluebird	Migratory Bird
Corvus corax	Common raven	Migratory Bird
Gymnorhinus cyanocephalus	Pinyon jay	Migratory Bird, BLM Special Status Species, USFWS Bird of Conservation Concern, Under 12-month review for protection under the ESA
Polioptila caerulea	Blue-gray gnatcatcher	Migratory Bird
Oreoscoptes montanus	Sage thrasher	Migratory Bird, BLM Special Status Species, USFWS Bird of Conservation Concern
Mimus polyglottos	Northern mockingbird	-
Sayornis saya	Say's phoebe	-
Sturnella neglecta	Western meadowlark	Migratory Bird
Zenaida macroura	Mourning dove	Migratory Bird, Nevada Game Species
Buteo jamaicensis	Red-tailed hawk	Raptor, Migratory Bird
Spizella breweri	Brewer's sparrow	Migratory Bird, Special Status Species
Selasphorus platycercus	Broad-tailed hummingbird	-
Corvus corax	Common raven	Migratory Bird
Leuconotopicus villosus	Hairy woodpecker	-
Psaltriparus minimus	Bushtit	-
Aquila chrysaetos	Golden eagle	Raptor, Migratory Bird, BLM Special Status Species

Sources: Nexus 2024d; USFWS 2021, 2022; BLM 2023a

Table 3-10 Wildlife Species with Potential to Occur or Noted to Occur through Agency Coordination

Scientific Name	Common Name	Status
Mammals		
Microdipodops megacephalus	Dark kangaroo mouse	BLM Special Status Species
Microdipodops pallidus	Pale kangaroo mouse	BLM Special Status Species
Euderma maculatum	Spotted bat	BLM Special Status Species
Corynorhinus townsendii	Townsend's big-eared bat	BLM Special Status Species
Myotis ciliolabrum	Western small-footed myotis	Special Status Species
Parastrellus hesperus	Canyon bat	-

Scientific Name	Common Name	Status
Avian		
Falco sparverius	American kestrel	Migratory Bird
Haliaeetus leucocephalus	Bald eagle	Migratory Bird, BLM Special Status Species
Tyto alba	Barn owl	-
Athene cunicularia	Burrowing owl	-
Accipiter cooperii	Cooper's hawk	-
Buteo regalis	Ferruginous hawk	Migratory Bird, BLM Special Status Species
Aquila chrysaetos	Golden eagle	Migratory Bird, BLM Special Status Species
Bubo virginianus	Great horned owl	-
Asio otus	Long-eared owl	Migratory Bird, BLM Special Status Species
Falco columbarius	Merlin	-
Accipiter gentilis	Northern goshawk	BLM Special Status Species
Circus hudsonius	Northern harrier	-
Aegolius acadicus	Northern saw-whet owl	-
Pandion haliaetus	Osprey	BLM Special Status Species
Falco Peregrinus	Peregrine falcon	BLM Special Status Species
Buteo jamaicensis	Red-tailed hawk	-
Buteo lagopus	Rough-legged hawk	-
Accipiter striatus	Sharp-shinned hawk	-
Buteo swainsoni	Swainson's hawk	BLM Special Status Species
Cathartes aura	Turkey vulture	-
Megascops kennicottii	Western screech owl	-
Spizella atrogularis	Black-chinned sparrow	BLM Special Status Species
Insects		
Danaus plexippus	Monarch butterfly	BLM Special Status Species
Mollusks		
Vallonia cyclophorella	Silky vallonia	-
Pupilla muscorum	Widespread column	-
Reptiles		
Phrynosoma platyrhinos	Desert horned lizard	-
Sceloporus magister	Desert spiny lizard	-
Pituophis catenifer	Gopher snake	-
Crotaphytus bicinctores	Great Basin collared lizard	-
Phrynosoma hernandesi	Greater short-horned lizard	BLM Special Status Species
Sceloporus occidentalis	Western fence lizard	-
Sceloporus uniformis	Yellow-backed spiny lizard	-

Sources: Nexus 2024d; USFWS 2021, 2022; BLM 2023a

Fourteen mammal species were observed within or near the area of analysis, including 11 sensitive bat species (**Table 3-9**). The Plan boundary is in mule deer and pronghorn habitat (NDOW 2017). There are no surface water sources or guzzlers in the Plan boundary.

Migratory birds are protected by the Migratory Bird Treaty Act, which prohibits the take (including killing, capturing, selling, trading, and transport) of protected species without prior authorization

by the USFWS. Migratory bird habitat within the Plan boundary consists of eight habitat communities. The most abundant habitats in the Plan boundary are sagebrush (54 percent), salt desert scrub (20 percent) and pinyon/juniper (15 percent) (Nexus 2024d).

A total of 16 migratory bird species were identified in Plan boundary, four of which are on the BLM Special Status Species List, two of which are USFWS birds of conservation concern, and one is a raptor (**Table 3-9**) (Nexus 2024d; USFWS 2021; BL 2023a). Additional migratory bird and raptor species may forage and nest in the Plan boundary.

Five reptile species were observed within or near the area of analysis (**Table 3-9**). No special status reptiles were documented within the Plan boundary.

There is no habitat that would support fish or aquatic species in the Plan boundary; therefore, these species are not analyzed further in this EA.

Special Status Wildlife Species

The special status wildlife species identified in the Plan boundary or with the potential to occur are listed in **Table 3-9** and **Table 3-10**.

Mammals: Dark and pale kangaroo mice are protected by the State of Nevada and are BLM Special Status species. There are 210 acres of potential dark kangaroo mouse (*Microdipodops megacephalus*) habitat occurs in the and 33 acres of potential pale kangaroo mouse (*Microdipodops pallidus*) habitat in the Plan boundary. During surveys neither species was documented within the Plan boundary (Nexus 2024d). There is no desert kangaroo rat (*Dipodomys deserti*) or pygmy rabbit (*Brachylagus idahoensis*) habitat, and no individuals were documented within the Plan boundary (Nexus 2024d).

The 11 bat species documented in the Plan boundary or that have the potential to occur in the Plan boundary are BLM Special Status Species and Nevada protected species. Of the three species with the potential to occur (**Table 3-10**), only the western small-footed myotis was present during surveys (Nexus 2024d). Eight other species of bats (**Table 3-9**) were documented as present within the Plan boundary. Roosting habitats are limited due to the lack of rocky outcrops; however, potential artificial roosts include two of the 13 abandon mine features within the Plan boundary (Nexus 2024d). The entire Plan boundary is a potential foraging area for bats.

Avian: The pinyon jay, sage thrasher, and Brewer's sparrow have been observed within the Plan boundary (Nexus 2024d). In April 2022, the USFWS was petitioned to list pinyon jay as a threatened or endangered species and to designate critical habitat. The USFWS is in the process of conducting its 12-month status review (Federal Register 2023). Pinyon and juniper woodland make up approximately 37 percent of the Plan boundary, providing nesting and foraging habitat for pinyon jay. Additional special status migratory bird species may use the area for forage, nesting, and stopover sites during migrations.

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668c), enacted in 1940, as amended. Five golden eagle nests were observed during the 2023 surveys all of which were unoccupied (Nexus 2024d).

A total of 49 raptor nests were identified in the four-mile radius of the Plan boundary, one of which was observed as being occupied by a prairie falcon (*Falco mexicanus*) during the March and April surveys, all other nests were unoccupied during the surveys. Additionally, the trees in the Plan boundary associated with the pinyon-juniper woodland community provide habitat for sensitive tree nesting raptors, including ferruginous hawk, northern goshawk, Swainson's hawk, and flammulated owl (*Psiloscops flammeolus*). Although no western burrowing owls were observed during surveys (Nexus 2024d), there are 4,757 acres of burrowing owl habitat within the Plan boundary. Other sensitive raptor species that have been identified, or have the potential to occur, in the Plan boundary include the short-eared owl, northern harrier, and peregrine falcon.

Reptiles: Greater short-horned lizards have been observed in the vicinity of the Plan boundary (BLM 2022).

Threatened and Endangered Wildlife Species

The monarch butterfly has the potential to occur in the area (USFWS 2022). The monarch butterfly has not been documented in the Plan boundary. Also, its larval host plants, Mexican whorled milkweed (*Asclepias fascicularis*) and showy milkweed (*Asclepias speciosa*), were not documented during baseline surveys. These species are most commonly found along streambanks, roadsides, moist to dry places such as irrigation ditches and fallowed fields, and sunny areas including wetlands and meadows, which are not present near the Plan boundary (Xerces Society 2012).

3.3.14.2 Environmental Consequences

Proposed Action

General Wildlife, Including Migratory Birds

The Proposed Action would affect wildlife by disturbing up to 250 acres of habitat (e.g., forage, nesting, breeding, etc.) until final reclamation is successful. Concurrent reclamation would minimize these effects before the end of the Project. Revegetation of surface disturbance would be seeded with a BLM-approved seed mix, and wildlife would be able to use the disturbed areas upon completion of successful reclamation.

The surface disturbance could occur anywhere within the Plan boundary, which could result in up to 250 acres of surface disturbance to mule deer and pronghorn habitat. Impacts to ground dwelling species could include the potential destruction of burrows during clearing activities or individual losses from drowning in sumps. Sumps would be constructed with egress for wildlife evacuation, but small mammals may still be affected.

Exploration activities would disturb wildlife year-round by increasing human and equipment presence. These impacts would remove or reduce the quality of available habitat within and adjacent to disturbance, and cause wildlife to vacate previously occupied habitats. In addition, wildlife could be injured or killed by equipment or vehicles that may collide with individuals. Speed limits would reduce the potential for wildlife collisions.

The 250 acres of disturbance would remove migratory bird and raptor nesting, and foraging habitat. Pre-construction clearance surveys would be conducted during the migratory bird nesting

season (Section 2.1.9.6), so nests or migratory bird young would not be affected by the Proposed Action.

The effects to general wildlife from the Proposed Action would be negligible, short-term, and localized.

Special Status Wildlife Species

Because the 250 acres of surface disturbance could occur anywhere within the Plan boundary, up to 250 acres of potentially suitable habitat for greater short-horned lizard, pinyon jays, sage thrasher, Brewer's sparrow, and golden eagle could be disturbed. All surface disturbance would be reclaimed, and impacts would be the same as described for general wildlife.

Approximately 250 acres of potential bat foraging and roosting habitat would be impacted by the Proposed Action. Bat species may be drawn to prey attracted to additional light from the Proposed Action during nighttime activities. Because of this, bats may collide with equipment while foraging. Kinross has an EPM to limit lighting so that it would be directed onto the pertinent site and away from adjacent areas not in use, and hooding and down-shielding lighting fixtures, as appropriate. Potential impacts would affect individual bats and not populations. Potential impacts to bat species would be negligible, short-term, and localized.

Up to 250 acres of surface disturbance may impact potential foraging habitat for golden eagles. The Proposed Action surface disturbance would be reclaimed and revegetated with a BLM-approved seed mix, and golden eagles would be able to use the disturbed areas for foraging upon completion of successful reclamation. Because the five golden eagle nests identified during the baseline surveys are located outside of the USFWS recommended one-mile buffer of surface disturbance, impacts to breeding golden eagles are not anticipated. Due to the speed limits placed on equipment operating in the Plan boundary and as posted for all other roads, the potential for golden eagle mortality due to vehicle collision would be low. Areas containing materials that could be hazardous to wildlife, including golden eagles, would be kept in closed containment or covered reducing the risk for potential exposure to golden eagles from these substances. Impacts to golden eagles would be negligible, short-term, and localized.

Effects to special status raptor species from the Proposed Action would be the same as those described above for golden eagles.

Threatened and Endangered Wildlife Species

No monarch butterflies were observed within the Plan boundary and no species of milkweed were documented during baseline surveys, therefore; no impacts to monarch butterflies are anticipated.

No Action Alternative

Under the No Action Alternative, Kinross would continue reclamation of previous exploration disturbance on 4.64 acres. The potential effects from the No Action Alternative are expected to be similar to those described for the Proposed Action but on a smaller scale due to the smaller area of approximately two percent of the Proposed Action, and shorter duration of authorized activities. With concurrent reclamation and intermittent disturbance of the Proposed Action, potential effects would be similar to those under the No Action Alternative.

4.0 REASONABLY FORESEEABLE EFFECTS

4.1 Introduction

This section analyzes potential reasonably foreseeable impacts from past, present, and reasonably foreseeable future actions (RFFAs) combined with the action alternatives. RFFAs include those federal and non-federal activities not yet undertaken, but sufficiently likely to occur, that a Responsible Official of ordinary prudence would take such activities into account in reaching a decision. These federal and non-federal activities that must be taken into account in the analysis of reasonably foreseeable impacts include, but are not limited to, activities for which there are existing decisions, funding, or proposal identified by the BLM. RFFAs do not include those actions that are highly speculative or indefinite (42 U.S.C. 4332(C)(iii).

RFFAs are those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends and are within the geographic scope and timeframe of the analysis (BLM 2008).

Mineral exploration is proposed to occur over the next 10 years; therefore, the temporal extent of 10 years was used for the reasonably foreseeable effects analysis. These include past actions that have resulted in present impacts and present actions that have existing and on-going disturbance. Therefore, 10 years includes RFFAs that may extend past the completion of the Proposed Action. RFFAs were analyzed using the BLM's Legacy Rehost 2000 System records (BLM 2023b), the BLM's Mineral and Land Records System (BLM 2023c), and Google Earth.

Only resources with measurable effects from the Proposed Action were carried through to the reasonably foreseeable analysis. Vegetation, including sensitive species, and non-native invasive and noxious species would have minor, long term, and localized effects could have reasonable foreseeable future effects in combination with other actions that are analyzed below (Section 4.1.1). No other resources were determined to have a measurable effect to analyzed for reasonably foreseeable effects.

4.1.1 Vegetation, including Special Status Species and Noxious and Invasive Species

The reasonably foreseeable effects area (RFEA) for vegetation resources, including special status species, is defined as the Plan boundary. The RFEA for noxious and invasive weeds encompasses both the Plan boundary and the primary travel route leading to it. These RFEAs represent the spatial extent within which potential combined impacts from the Proposed Action and other RFFAs may occur.

Reasonably foreseeable actions that may affect vegetation resources include livestock grazing, dispersed recreation, and the Greenlink transmission line ROWs. These ROWs comprise a 200-foot-wide, linear 525-kV transmission line corridor (NVNV105844735) and a temporary construction corridor authorized through 2030 (NVNV105848004) (BLM 2024a). Therefore the temporal extent for RFFAs would be 30 years. Effects to vegetative resources from this ROW were analyzed in the Greenlink Final Environmental Impact Statement (FEIS) including combined effects for other land uses including mineral exploration (BLM 2024a).

The RFEA includes the affected environment described in Section 3.3.10.1 and is tiered to the Greenlink FEIS (BLM 2024a). For sensitive species, the FEIS determined that impacts would occur within both permanent and temporary ROW areas, where habitat for special status plants would be removed. However, all temporarily disturbed areas would be reclaimed following construction. Upon successful reclamation, these areas are expected to become suitable for recolonization by special status plant species. Portions of the temporary ROW not subject to surface disturbance could still be impacted by airborne dust generated from nearby construction activities and vehicle traffic on unpaved access roads. These effects may degrade habitat quality and lead to the loss or damage of individual plants. As vegetation communities become smaller and more fragmented due to ground disturbance noxious and invasive species could increases. This fragmentation could increase the spread of noxious and invasive species and reduce reclamation success for vegetative resources. The Greenlink Project has EPMs to reduce these effects.

4.1.1.1 Reasonably Foreseeable Effects of Proposed Action

Based on the long-term, localized, and minor effects of the Proposed Action, and considering that the reasonably foreseeable effects would be similar to those associated with surface disturbance activities analyzed in the Greenlink FEIS (BLM 2024a), the Greenlink FEIS provides a sufficient analysis of site-specific effects from construction that are comparable to those expected from the Montezuma Exploration Project's Proposed Action. These include impacts from drilling, temporary access roads, construction-related disturbance, and reclamation activities.

Anticipated effects from the Proposed Action include disturbance to general vegetation, loss of habitat for sensitive plant species, the potential removal of individual sensitive plants, and the introduction and possible spread of noxious and invasive weeds. These impacts would be mitigated through implementation of the Proposed Actions EPMs, the project-specific weed management plan, and reclamation. When considered in combination with other RFFAs, the effects of the Proposed Action would remain minor, localized, and long-term in nature.

4.1.1.2 Reasonably Foreseeable Effects of No Action Alternative

Based on the negligible, localized effects of the No Action Alternative no further analysis is warranted.

5.0 CONSULTATION, COORDINATION, AND PREPARERS

The following is a summary of persons, groups, and agencies consulted, as well as a list of individuals responsible for the preparation of this EA.

5.1 Government-to-Government Consultation with Native American Tribes

This section describes the specific actions taken by the BLM to consult and coordinate with Native American tribes and government agencies. Various federal laws require the BLM to consult with Native American tribes, State Historic Preservation Office, USFWS, and USEPA during the NEPA decision-making process. In addition to formal scoping, the BLM implemented collaborative outreach and a public involvement process that included inviting agencies to be cooperative partners for the NEPA process.

The BLM contacted the following tribal governments during the EA process:

- Duckwater Shoshone Tribe
- Timbisha Shoshone Tribe
- Fort Independence Paiute Tribe

Notification letters of the Proposed Action were sent to the tribes on December 17, 2024 and the Duckwater Shoshone Tribe and the Timbisha Shoshone Tribe requested the final report for the Class III survey as well as a site visit. The Timbisha Shoshone Tribe and the Duckwater Shoshone Tribe were invited by the BLM and attended site visits on February 20, 2025 and April 3, 2025. The tribes discussed concerns regarding the proposed roads, laydown areas, and they requested tribal monitors for surface disturbance (BLM 2025b, 2025c). The Fort Independence Paiute Tribe was also invited to these site visits, but did not attend. Consultation is a government-to-government process, and tribal consultation efforts are ongoing.

5.2 Consultation with Agencies

Other agencies coordinated with during the NEPA process including:

- NDOW

5.3 List of Preparers

Tables 5-1, 5-2, 5-3, 5-14, and **5-5**, list who prepared or contributed to the development of this EA.

Table 5-1 United States Department of the Interior, BLM

Name	Role/Responsibility
Jeff Kirkwood	NEPA Compliance
Perry Wickham	Tonopah Field Manager, Native American Consultation
Kristin Reid	Geology/Mineral Extraction

Name	Role/Responsibility
Ashton Jenks	Cultural Resources; Paleontological Resources
Johnathan Hall	Mining Law Administration; Mining Engineer
Matthew Fockler	Socioeconomics
Matthew Wood	Technical Lead
Tom Gibbons	Water Quality/Quantity; Weland/Riparian Zones; Floodplains
William Clemons	Vegetation; Noxious Weeds, and Invasive Non-Native Species; Grazing Management; Soils; Farmlands (Prime or Unique);
Frank Giles	Global GHG; Noise; Air Quality
Sarah LeVane	Wildlife; Threatened and Endangered Species; Special Status Species; Migratory Birds; Wild Horses and Burros
Michael Strother	Wildlife; Threatened and Endangered Species; Special Status Species; Migratory Birds
Katerina St Claire	Lands and Realty
Jensen Reese	Wastes, Hazardous or Solid
Kenner Vorheis	Recreational; Visual; Wilderness; Areas of Critical Environmental Concern
David Dick	Native American Concerns
Robert Burdick	Forestry

Table 5-2 Consultant – Nexus Environmental Consultants, Inc.

Name	Role/Responsibility
Kristi Schaff	Project Manager
Kandy Havens	Technical Author
Mindy Seal	Resource Author
Chris Johnson	Geographic Information Systems
Dulcy Engelmeier	Technical Editor

Table 5-3 Proponent – Kinross Gold USA, Inc.

Name	Title
Josh Ellis	Director, Greenfield Exploration
Patricia Capistrant	Senior Geologist
John Young	Great Basin Environmental Services – Permitting Support

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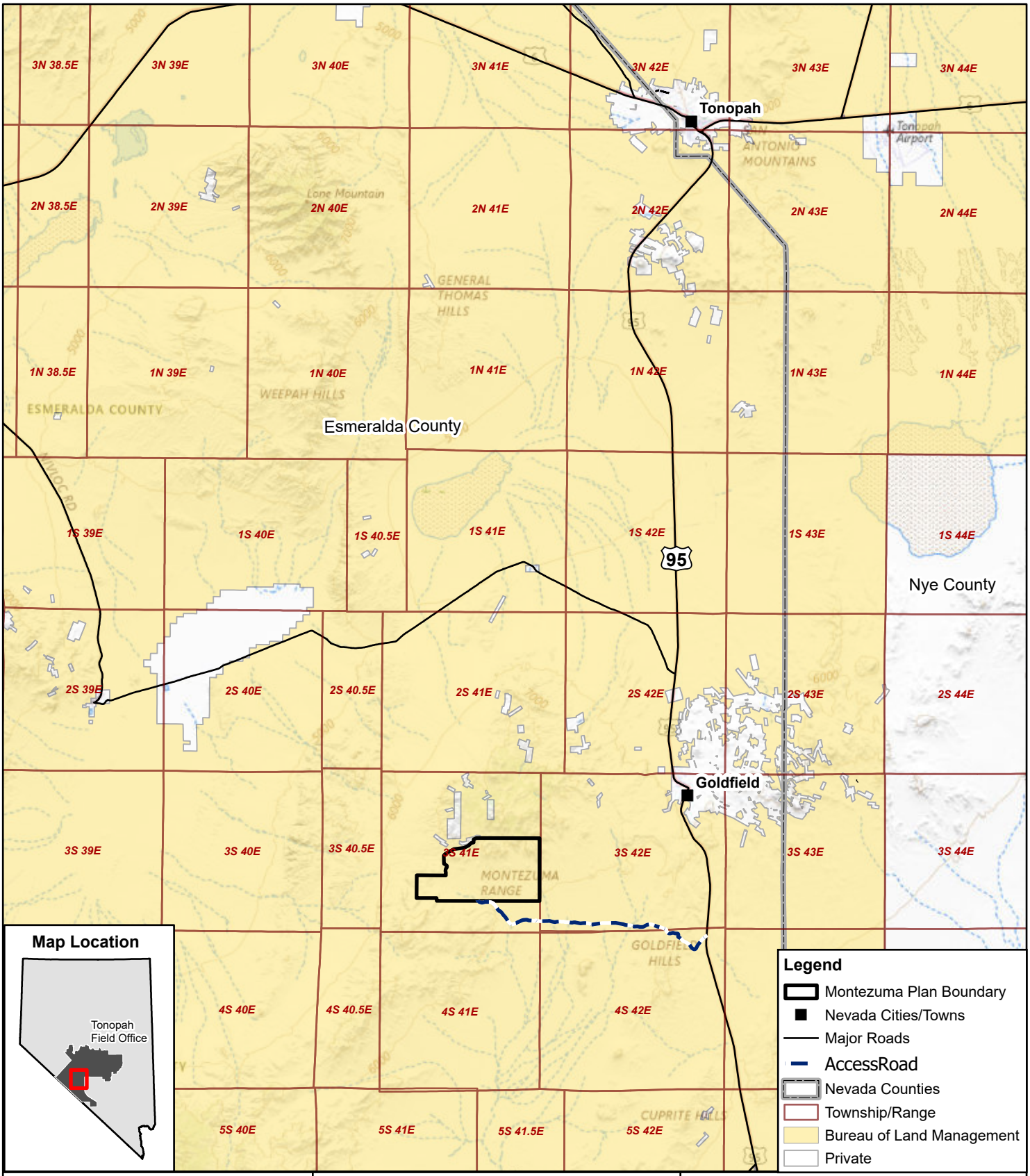
FIGURES



U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Battle Mountain
BLM District
Tonopah Field Office

MONTEZUMA EXPLORATION PROJECT

0 2.5 5 Miles

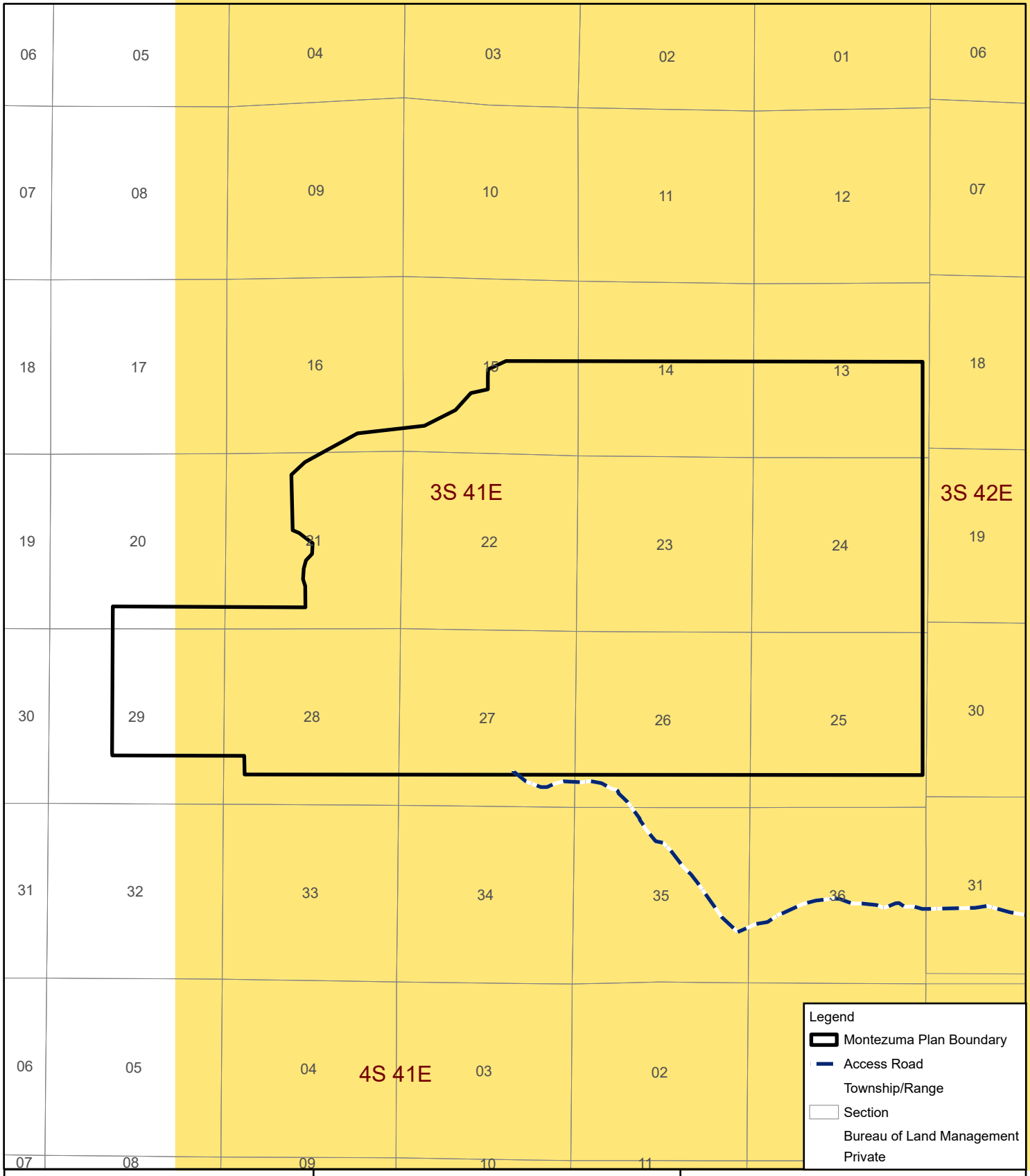
N

1:316,800

PROJECT LOCATION

FIGURE 1

1/27/2025



Battle Mountain
BLM District
Tonopah Field Office

MONTEZUMA EXPLORATION PROJECT

0 2,000 4,000 Feet

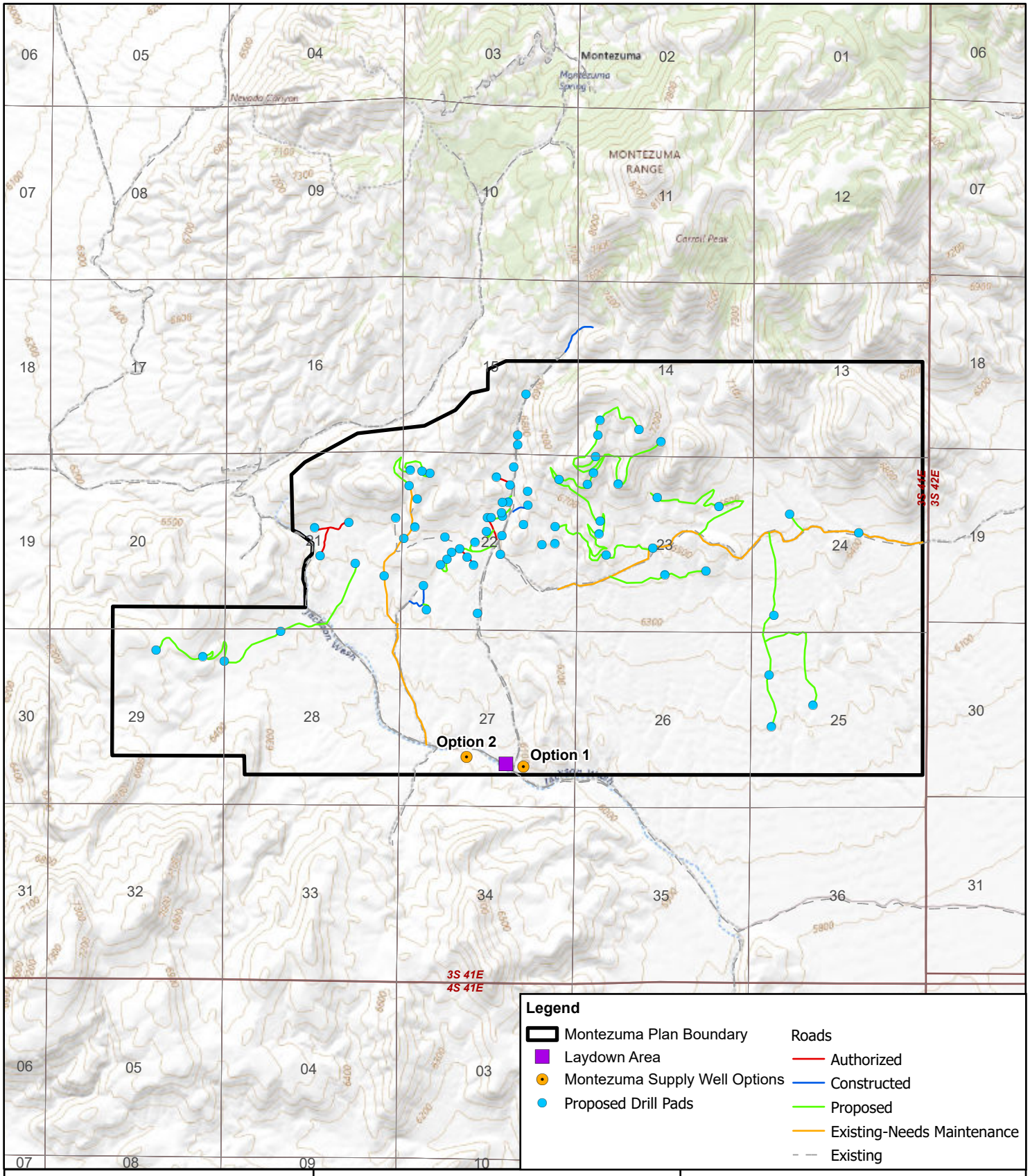
1:48,000

N

PROJECT LEGAL DESCRIPTION

FIGURE 2

1/27/2025



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BLM District
Tonopah Field Office

MONTEZUMA EXPLORATION PROJECT

0 2,000 4,000 Feet

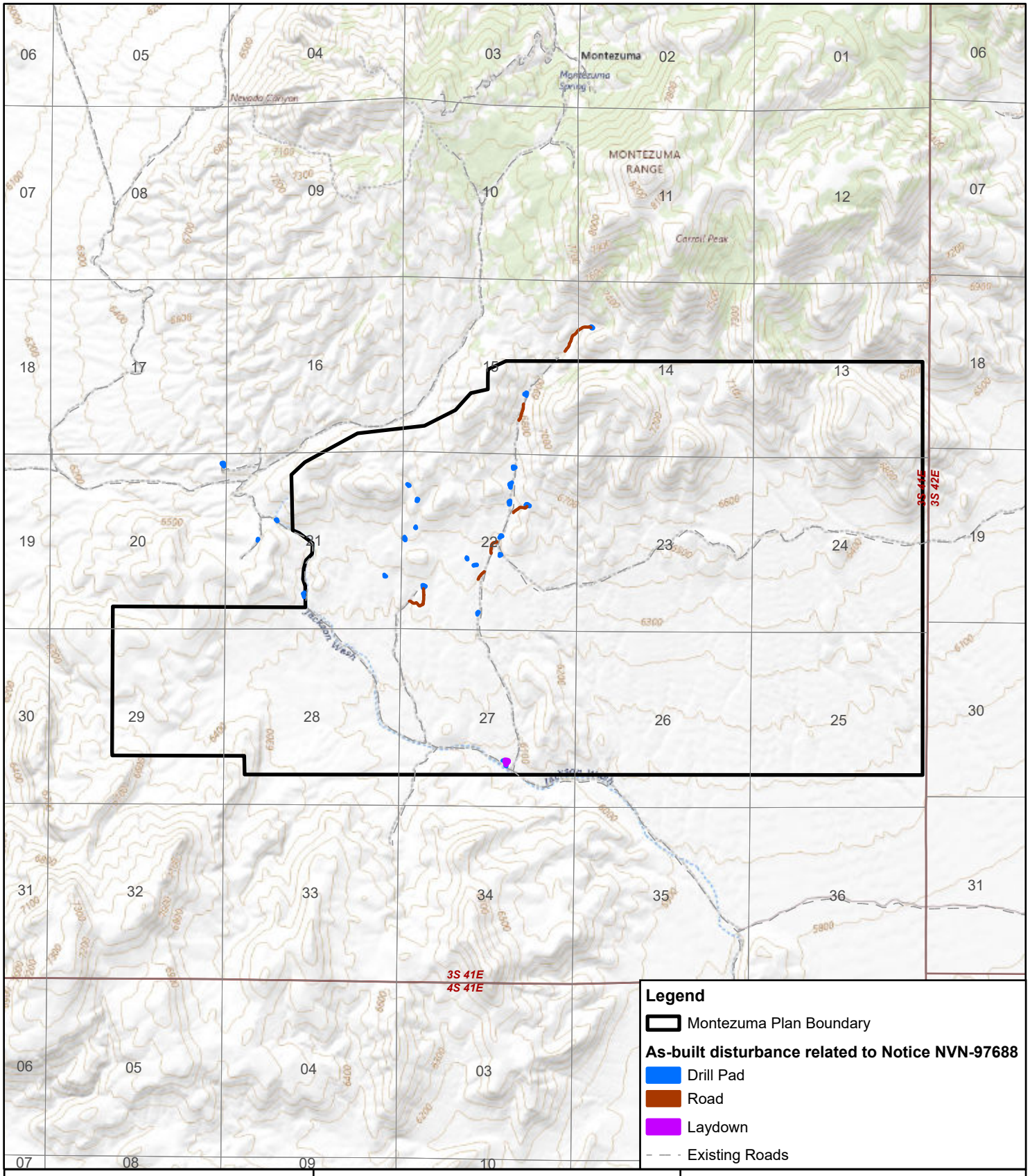
1:48,000

N

PROPOSED ACTION

FIGURE 3

5/2/2025



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MONTEZUMA EXPLORATION PROJECT

0 1,000 2,000 Feet

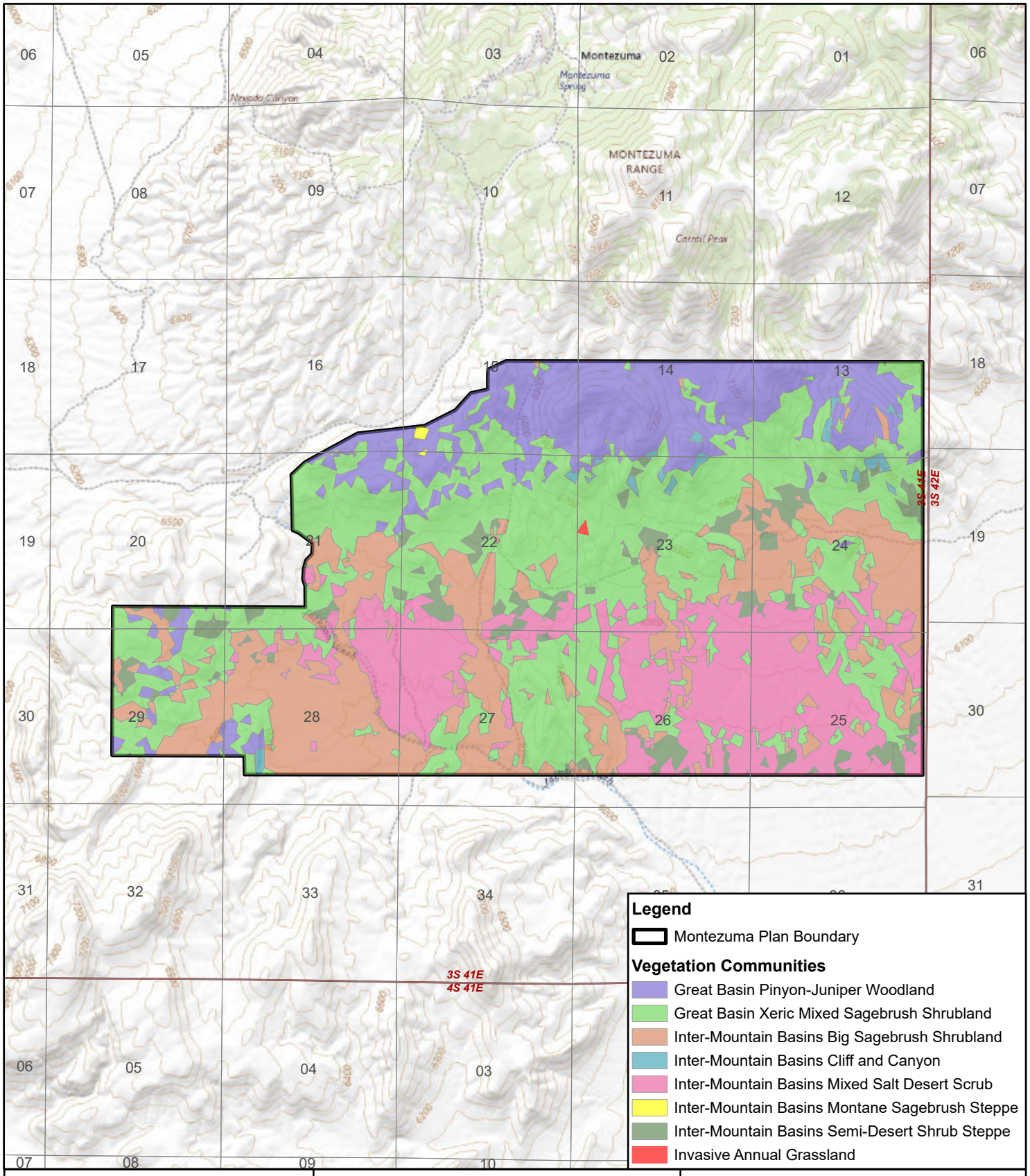
1:48,000

N

NO ACTION

FIGURE 4

5/22/2025



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MONTEZUMA EXPLORATION PROJECT

0 2,000 4,000 Feet

N

1:48,000

VEGETATION COMMUNITIES

FIGURE 5

5/22/2025