



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Carson City Field Office
5665 Morgan Mill Road
Carson City, Nevada 89701
<http://www.nv.blm.gov>



May 21, 2007

In Reply Refer To:
NV030-1610
EA-NV-030-07-021

Dear Reader:

Enclosed for your consideration is the Denton-Rawhide Mine Land Sale Proposed Plan Amendment (Plan Amendment), Environmental Assessment (EA), and Finding of No Significant Impact (FONSI) prepared by the Bureau of Land Management, Carson City Field Office (BLM) for management of certain public land in north Mineral County, Nevada. The proposed Plan Amendment is open for a 30-day review and protest period, ending on June 21, 2007. Following the 30-day review and protest period, a Decision Record (DR) will be prepared to document the decisions made.

Kennecott Rawhide Mining Company (KRMC) requested BLM conduct a sale of selected parcels of public land within and adjacent to fee land owned by KRMC at the Denton-Rawhide Mine. Public land in that area is not currently identified for disposal in the Carson City Field Office Consolidated Resource Management Plan (CRMP) and requires an amendment to the CRMP to change that designation. These parcels of land meet the criteria for disposal but have not been designated as such. Acquisition of the public land parcels by KRMC would result in consolidation of isolated tracts of public land into private ownership creating a contiguous block of private land. Consolidation of land ownership in the mine area would allow KRMC to pursue sustainable development options or alternative post-mine land uses unrelated to mining.

The BLM has scheduled two presentations for the public at the County Commission Meetings for Mineral and Churchill Counties in early June. The first is before the Mineral County Commission on Wednesday June 6, 2007, 105 S. "A" Street, Hawthorne, NV. The second is before the Churchill County Commission on Thursday June 7, 2007, 155 N. Taylor Street #145, Fallon, NV. Please refer to the County Commission agendas for scheduled times.

Upon resolution of any protests, a Final Resource Management Plan Amendment and Decision Record will be issued. The approved Final Plan will be mailed to all who participated in the planning process and is available on the Carson City Field Office website http://www.blm.gov/nv/st/en/fo/carson_city_field.html.

Comments may be sent to: BLM Carson City Field Office, 5665 Morgan Mill Road, Carson City, NV 89701, Attn: T. Knutson, fax: (775) 885-6147, or e-mail: tknutson@blm.gov. If you have any questions, please contact Terri Knutson at (775) 885-6156.

Sincerely,

/s/ Donald T. Hicks

Donald T. Hicks
Field Manager
Carson City Field Office

PROTEST PROCEDURES

Any person who participated in the planning process for this Proposed RMP Amendment, and who has an interest that is or may be adversely affected, may protest approval of this plan and the land use planning decisions contained within it during this 30-day period (refer to Title 43, Code of Federal Regulations, Part 1610.5-2). Only those persons or organizations who participated in the planning process leading to the Proposed Plan Amendment may protest. The protesting party may raise only those issues submitted for the record during the planning process leading up to the publication of this current document. These issues may have been raised by the protesting party or others. New issues may not be brought into the record at the protest stage. Protests must be filed with the BLM Director in writing at either of the following addresses:

Regular mail:

Director (210)
Attention—Brenda Williams
P.O. Box 66538
Washington, DC 20035

Overnight mail:

Director (210)
Attention—Brenda Williams
1620 L Street, NW, Suite 1075
Washington, DC 20036

E-mailed and telefaxed protests will not be accepted as valid protests unless the protesting party also provides the original letter by either regular or overnight mail, postmarked by the close of the protest period. Under these conditions, the BLM will consider the E-mail or faxed protest as an advance copy and it will receive full consideration. If you wish to provide BLM with such advance notification, please direct these advance copies as follows:

E-mail:

Brenda.Hudgens-Williams@blm.gov

Faxes:

(202) 452-5112 (Attn: BLM Protest Coordinator)

IMPORTANT: In accordance with 43 CFR 1610.5-2, the protest must contain the information described in the following checklist.

- **The name, mailing address, and telephone number of the person filing the protest.**
- **The “interest” of the person filing the protest (how will you be adversely affected by the approval or amendment of the resource management plan?).**
- **A statement of the part(s) of the Proposed RMP and the issue(s) being protested. (To the extent possible, this should reference specific pages, paragraphs, sections, tables, or maps that are believed to be incorrect or incomplete.)**
- **A copy of all documents addressing the issue(s) that the protesting party submitted during the planning process OR a statement of the date they were discussed for the record.**
- **A concise statement explaining why the protestor believes the BLM State Director’s proposed decision is incorrect.**

All of these elements are critical parts of your protest. Take care to document all relevant facts. As much as possible, reference or cite the planning documents or available planning records (e.g., meeting minutes or summaries, correspondence). The BLM Director will make every attempt to promptly render a decision on the protest. The decision will be in writing and will be sent to the protesting party by certified mail, return receipt requested. The decision of the BLM Director will be the final decision of the Department of the Interior.

The BLM's practice is to make protests, including the names and home addresses of respondents, available for public review. Individual respondents may request confidentiality. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may request in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

Upon resolution of any protests, a Final RMPA/DR will be issued. The approved Final Plan will be mailed to all who participated in the planning process. It will also be available to all parties through the Carson City Field Office website http://www.blm.gov/nv/st/en/fo/carson_city_field.html or by mail upon request.

FINDING OF NO SIGNIFICANT IMPACT

Denton-Rawhide Mine Land Sale Proposed Plan Amendment Environmental Assessment EA-NV-030-07-021

Kennecott Rawhide Mining Company (KRMC) submitted a request to the Bureau of Land Management (BLM), Carson City Field Office to conduct a sale of selected parcels of public land within and adjacent to fee land owned by KRMC at the Denton-Rawhide Mine in North Mineral County, NV. Public land in that area is not identified for disposal in the Carson City Field Office Consolidated Resource Management Plan (CRMP) and requires an amendment to the CRMP to change that designation.

Acquisition of the public land parcels by KRMC would result in consolidation of isolated tracts of public land into private ownership creating a contiguous block of private land for KRMC. Consolidation of these tracts of land into private ownership would have the net effect of increasing efficiency of BLM management of land in the project area. These tracts, due to their location or other characteristics, are difficult and uneconomic to manage as part of the public land package in the area. Consolidation of land ownership in the mine area would also allow KRMC to pursue sustainable development options or alternative post-mine land uses unrelated to mining.

Two alternatives were considered in the Denton-Rawhide Mine Land Sale Proposed Plan Amendment (Plan Amendment) and Environmental Assessment (EA). The alternatives analyzed are:

- Alternative A – Proposed Resource Management Plan Amendment would change the land tenure designation of selected parcels of public land from retention to disposal resulting in a BLM sale offer of the land to KRMC using direct (non-competitive) sale procedures. The area proposed in the Plan Amendment includes approximately 410 acres located in portions of Sections 4, 5, 8, and 9, Township 13 North, Range 32 East; Mineral County, Nevada.
- Alternative B – No Action, Continuation of Current Management, public land would remain designated for retention in federal management and no sale would occur. Should the No Action Alternative be selected, reclamation of public land parcels included in the proposed sale would be completed in accordance with the existing plans approved by BLM under Permit No. N36-86-003P and Nevada Bureau of Mining Regulation and Reclamation Permit No. 0041.

Based on the analysis of the Denton-Rawhide Mine Land Sale Proposed Plan Amendment and Environmental Assessment, EA-NV-030-07-021, I have determined that the action will not have a significant effect on the human environment and an environmental impact statement will not be prepared.

/s/ Donald T. Hicks

May 21, 2007

Donald T. Hicks
Manager,
Carson City Field Office

Date

**DENTON-RAWHIDE MINE LAND SALE
PROPOSED PLAN AMENDMENT
AND
ENVIRONMENTAL ASSESSMENT**

U.S. Department of the Interior
Bureau of Land Management
Carson City Field Office
5665 Morgan Hill Road
Carson City, Nevada 89701

May 2007

TABLE OF CONTENTS

Page

CHAPTER 1

INTRODUCTION	1-1
Purpose and Need for the Plan Amendment and Environmental Assessment	1-1
Planning Area.....	1-1
Scoping/Issues.....	1-2
Planning Criteria	1-2
Planning Process	1-2

CHAPTER 2

ALTERNATIVES	2-1
Alternative A - Proposed Resource Management Plan Amendment.....	2-1
Alternative B – No Action, Continuation of Current Management	2-2
Alternatives Considered but Eliminated from Detailed Analysis.....	2-2

CHAPTER 3

AFFECTED ENVIRONMENT	3-1
Introduction	3-1
Geological Resources	3-4
Recreation.....	3-5
Land Use/Access.....	3-5
Social and Economic Resources.....	3-5

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES	4-1
Geological Resources	4-1
Recreation.....	4-2
Land Use/Access.....	4-2
Social and Economic Resources.....	4-2
CUMULATIVE IMPACTS	4-2

CHAPTER 5

CONSULTATION, COORDINATION AND PREPARATION	5-1
Notice of Availability of EA and FONSI.....	5-1
Consultation with Others	5-1
List of Preparers and Reviewers.....	5-1

CHAPTER 6

REFERENCES	6-1
-------------------------	------------

LIST OF FIGURES

FIGURE 1 Projects Location Map.....	1-4
FIGURE 2 Site Map	1-5

CHAPTER I

INTRODUCTION

Kennecott Rawhide Mining Company (KRMC) has requested that the Bureau of Land Management (BLM), Carson City Field Office conduct a sale of selected parcels of public land within and adjacent to fee land owned by KRMC at the Denton-Rawhide Mine. Public land in that area is not currently identified for disposal in the Carson City Field Office Consolidated Resource Management Plan (CRMP) and would require an amendment to the CRMP to change that designation. These parcels of land meet the criteria for disposal but have not been designated as such.

PURPOSE AND NEED FOR THE PLAN AMENDMENT AND ENVIRONMENTAL ASSESSMENT

The purpose of the Plan Amendment is to amend the Carson City Field Office CRMP to designate disposal of selected public land. The need for action is in response to KRMC's request to purchase public land parcels lying among and adjacent to patented claims within the Denton-Rawhide Mine area that are not currently identified for disposal in the CRMP. The need for the Plan Amendment is to change the land tenure designation from retention to disposal to accommodate sale of the selected public land.

Acquisition of the public land parcels by KRMC would result in consolidation of isolated tracts of public land into private ownership creating a contiguous block of private land for KRMC. Consolidation of land ownership in the mine area would allow KRMC to pursue sustainable development options or alternative post-mine land uses unrelated to mining.

Consolidation of these tracts of land into private ownership would also have the net effect of increasing efficiency of BLM management of land in the project area. These tracts, due to their location or other characteristics, are difficult and uneconomic to manage as part of the public land package in the area.

PLANNING AREA

The Denton-Rawhide Mine is located in the Regent Mining district near the abandoned mining camp of Rawhide, in west-central Nevada approximately 55 road miles southeast of Fallon and 45 miles north of Hawthorne, Nevada. The mine lies at the northern end of the Gabbs Valley, along State Route 839 (**Figure I**).

Active mineral exploration and small-scale mining began in the area in the early 1900s, with emphasis on silver, gold, and tungsten. Prior to the 1980s, these activities were directed at locating small high-grade deposits. With introduction of economical methods for recovery of gold and silver from low-grade ore, emphasis of exploration shifted to finding and developing large, low-grade ore deposits. KRMC currently owns 58 patented mining claims in the area covering approximately 758 acres.

In 1986, Kennecott Exploration Company identified recoverable gold and silver deposits, and applied for agency approval to mine up to 36 million tons of ore over a 12-year period. Construction of the Rawhide Mine began in 1989 and gold and silver were produced the following year. Active mining operations were completed in October 2002 and the site is undergoing reclamation. During active mining operations, KRMC employed approximately 175 persons. Current operations are conducted by a staff of seventeen employees and four contractors. The majority of mining related equipment has been

decommissioned or otherwise removed from the mine complex. Process solution will continue to be applied to the heap leach facility until economic recovery of precious metals is no longer possible.

The proposed Plan Amendment and land sale involves approximately 425 acres of public land administered by BLM in the vicinity of the Denton-Rawhide Mine in Mineral County, Nevada (**Figure 2**). KRMC has requested both a sale of land and the mineral estate associated with that land. This Environmental Assessment (EA) analyzes potential impacts resulting from designation of selected public land for disposal and sale to KRMC.

SCOPING/ISSUES

To allow for an early and open process for determining the scope and significance of issues related to the Plan Amendment (40 CFR 1510.7), a public scoping period was provided by BLM. A Notice of Intent to prepare an Amendment to the Carson City Field Office CRMP was published in the Federal Register on October 17, 2005 (NV-030-5700-EU; N-79995). Publication of this notice in the Federal Register initiated a 30-day public scoping period for the Proposed Action that provided for acceptance of comments through November 18, 2005.

The Board of Mineral County Commissioners held a public hearing on November 2, 2005 in Hawthorne, Nevada to accept comment on the proposed sale of public land to KRMC. A representative of the Mineral County Regional Planning Commission and Director of Hawthorne Utilities were present and expressed support for the land sale.

PLANNING CRITERIA

BLM regulations guiding the development of resource management plans and plan amendments require preparation of planning criteria (43 CFR 1610.4-2). These criteria guide development of the plan and ensure that it is tailored to identified issues and unnecessary data collection is avoided. These criteria are intended to streamline and simplify the planning process:

- 1) Plan cooperatively with other federal agencies, Tribal governments, local government, and all other affected groups and individuals.
- 2) Use best existing data to the extent possible.
- 3) Identify opportunities to resolve problems.
- 4) Formulate a range of alternatives from an emphasis on protection of natural values to maximizing human land uses and facilities.
- 5) Document analysis of alternatives in plain language and discuss minor issues briefly.
- 6) Select the preferred alternative based on the combination which best meets demands for public land while minimizing disruption of the human environment.
- 7) Decisions in the plan amendment will be consistent with existing land use plans and policies of adjacent Federal, Tribal, State, and local agencies and entities.

PLANNING PROCESS

Relationship to BLM Policies, Plans, and Programs

The amendment to the CRMP and sale of public land are two separate actions addressed in this EA. Criteria for sale of public land are contained in Section 203 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1713). This Act allows disposal of tracts that due to their location or other characteristics are difficult and uneconomic to manage as part of the public land package in the area.

Many parcels included in the proposed land sale are fractions of acres surrounded by private fee land. In addition, none of the parcels are considered suitable for management by another Federal department or agency. Disposal of these tracts would serve important public objectives including but not limited to expansion of communities and economic development. Such use of these tracts could be achieved prudently or feasibly in conjunction with fee land and therefore outweigh other public objectives and values, including recreation and scenic values, which would be served by maintaining such tracts in Federal management.

BLM policy requires “*Planning decisions...be developed in concert with sustainable development concept. These concepts include a vision of economic prosperity, a healthy environment, and a just and equitable society.*” Therefore, it is necessary and appropriate that plans (e.g., Resources Management Plans), programs, and projects be evaluated for their contributions to social, environmental, and economic goals.

An amendment to the CRMP offering sale of public land not currently identified for disposal by the CRMP may be approved only after analysis of each specific disposal request. This analysis includes preparation of an environmental assessment (this document), a cultural resources clearance, a report on mineral values, a Phase I Environmental Site Assessment, and an appraisal to establish fair market value.

BLM decision options include approving the amendment, approving alternatives to the amendment to mitigate environmental impacts, approving the amendment with stipulations to mitigate environmental impacts, or denying the amendment. If BLM approves the amendment, designated parcels of public land would be offered for sale to KRMC. Denial of a request to amend the plan is a plan level decision made by the State Director and is protestable to the BLM director under 43 CFR 1610.5-2(a).

Collaboration

The plan amendment process involves collaboration with public and private parties that have an interest in the specific tracts included in the land tenure change and land sale. BLM’s collaboration has involved input from individuals, the Rawhide Community Advisory Group, Mineral County Commissioners, Churchill County Commissioners, and sister agencies. Issues and concerns that have been received by BLM during the public participation and collaboration process are included in the *Scoping/Issues* section of this EA.

Related Plans

BLM planning regulations require that Resource Management Plans and Amendments be consistent, to the extent possible, with officially approved land use plans of other Federal, Tribal, State, and local agencies. Other land use plans relevant to the Denton-Rawhide Mine Land Sale Proposed Plan Amendment include a community action plan and a sustainable development options document developed by the Rawhide Community Advisory Group. Development of this document has included participation by Mineral and Churchill counties, community of Gabbs, Walker River Paiute Tribe, and KRMC.

Figure I – Where in Nevada are You

Figure 2 – Public Land Proposed for Purchase

CHAPTER 2 ALTERNATIVES

ALTERNATIVE A - PROPOSED RESOURCE MANAGEMENT PLAN AMENDMENT

The Proposed Plan Amendment would change the land tenure designation of selected parcels of public land from retention to disposal resulting in a BLM sale offer of the land to KRMC using direct (non-competitive) sale procedures. The area proposed in the Plan Amendment is shown on **Figure 2** and includes approximately 425 acres located in portions of Sections 4, 5, 8, and 9, Township 13 North, Range 32 East; Mineral County, Nevada.

Consolidation of the selected public land tracts would reduce the administrative land management burden of the BLM for isolated parcels within and immediately adjacent to the Denton-Rawhide Mine complex. Acquisition of this property would consolidate land within and surrounding the open pit mine into private ownership and accommodate pursuit of other sustainable, post-mine development opportunities for the site.

Existing mine infrastructure on the parcels of public land proposed for disposal designation and sale include Administrative and Training buildings consisting of multiple off-site constructed buildings. The Truck Shop, Geology Shed, and Merrill-Crowe Processing Plant have concrete foundations and floors and are constructed with steel I-beams and steel siding.

The Administration and Training Center buildings are used by KRMC to support current ore processing and mine closure activities. Since mine operations ceased in 2002, use of the Truck Shop for its intended purpose as an equipment repair and maintenance facility has decreased and portions of it are used for dry storage. The Geology Shed is used to store rock cores from exploration drilling. The Merrill-Crowe Processing Plant is used to extract gold and silver from ongoing process solution applied to the heap leach facility.

Additional facilities located on public land proposed for sale include a fuel farm with several aboveground tanks containing various petroleum products including diesel fuel, gasoline, hydraulic oil, and motor oil. The tanks are located near the Truck Shop facility. Process ponds associated with ore processing, a petroleum hydrocarbon bio-remediation cell, and truck and equipment wash pad are also located on public land proposed for sale as shown on **Figure 2**.

Final disposition, reclamation, and closure of these facilities would remain the responsibility of KRMC pursuant to BLM Permit No. N36-86-003P and Nevada Bureau of Mining Regulation and Reclamation Permit No. 0041. The Nevada Division of Environmental Protection holds a performance bond on the mine complex to ensure closure is in accordance with approved plans.

Two existing water wells and a water line, installed to service the mine, could also augment other potential industrial post-mine uses. Any entity involved with post-closure use of this water source would need to obtain the water right for these wells from the State Engineer. A 10.8 kV power line and substation servicing the mine would require re-authorization by BLM for any future post-mine uses.

ALTERNATIVE B – NO ACTION, CONTINUATION OF CURRENT MANAGEMENT

The only alternative to the Proposed Action considered in this EA is the No Action Alternative. Under the No Action Alternative, public land would remain designated for retention in federal management and no sale would occur. Should the No Action Alternative be selected, reclamation of public land parcels included in the proposed sale would be completed in accordance with the existing plans approved by BLM under Permit No. N36-86-003P and Nevada Bureau of Mining Regulation and Reclamation Permit No. 004I.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS

BLM's current policy and regulations for land sales (43 CFR 2710.0-6 (c)(1-5)) require use of competitive sale procedures unless the authorized officer determines the public interest would best be served by modified competitive bidding or direct (non-competitive) sale. In this instance, KRMC owns 758 acres of land that surround or adjoin the public land proposed for sale. KRMC also holds mining claims filed pursuant to the 1872 Mining Law on all the public land proposed for sale. In recognition of KRMC's existing equities in the land and their adjoining ownership, KRMC meets regulatory requirements for a direct sale. There is little likelihood that KRMC would relinquish their interest in existing mining claims that currently encumber the land to facilitate a competitive sale of the surface and minerals of the public lands.

BLM has determined that it would be undesirable to create a split-estate situation where the minerals associated with the land parcels included in the proposed sale remain encumbered with mining claims and continue to be under United States ownership and the surface sold for private development purposes. Alternate sale methods will not be considered further.

CHAPTER 3 AFFECTED ENVIRONMENT

INTRODUCTION

Mapping and descriptive data for the existing environment in the Plan Amendment area can be found in the Draft EIS for the Denton Rawhide Mine Expansion Project (BLM 1996). For purposes of this Plan Amendment EA, the Study Area is the geographic area that encompasses the Denton-Rawhide Mine and the tracts of land included in the solicitation for sale to KRMC (see **Figure 2**).

Appendix 5 of BLM's NEPA Handbook (H-1740-1) identifies Critical Elements of the Human Environment that are subject to requirements specified in statutes or executive orders and must be considered in all BLM environmental documents. The Critical Elements and their status in relation to implementation of Alternative A – Proposed Action are included in **Table 3-1** below.

Critical Element	Not Present	Present/Not Affected	Present/May Be Affected
Air Quality		√	
Areas of Critical Environmental Concern	√		
Cultural Resources		√	
Farm Lands (prime or unique)	√		
Floodplains	√		
Native American Religious Concerns		√	
Threatened or Endangered Species		√	
Migratory Birds		√	
Wastes, Hazardous or Solid		√	
Water Quality (Surface/Ground)		√	
Wetlands/Riparian Zones	√		
Wild and Scenic Rivers	√		
Wilderness	√		
Invasive, Nonnative Species		√	
Environmental Justice	√		

The following rationale was used to determine that Critical Elements present in the area would not be affected as a result of implementation of the Proposed Action.

- **Air Quality** – Existing air quality in the area would not be affected by amending the CRMP to designate disposal of selected public land. Active mining operations at the site have ceased and areas proposed for disposal are undergoing reclamation, currently being used in an administrative

capacity (buildings and parking areas), or used in conjunction with ore processing (process solution ponds and Merrill-Crowe Processing Plant).

- **Cultural Resources** – Following BLM regulations (43 CFR Part 8100) and other federal laws including the National Historic Preservation Act (16 USC § 470f) and its implementing regulations (36 CFR Part 800), as amended, BLM reviewed the immediate region for historic properties prior to a federal undertaking (proposed land disposal). By definition, an historic property is a “prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places” and includes “artifacts, records, and remains that are related to and located within such properties” (36 CFR 800.16(l)(1)).

Based on research of files at the Carson City Field Office and the Nevada State Museum, known resources in the immediate area represent past human use of the landscape in and immediately adjacent to the 425 acres of public land. Of the 425 acres, BLM determined that past cultural resource inventories and mining disturbances had occurred on all but 166 acres in seven areas. In late 2006, these locations were inventoried for historic properties per Nevada BLM standards and guidelines (Reno and Zeier 2007).

Based on recent and past cultural resource inventories, 17 known cultural resources are present. These include prehistoric-period lithic scatters and camp sites of an extensive period of time ranging from the Early Archaic (over 7000 years ago) through the nineteenth-century. However, sites in this location are predominantly historic-era, represented by debris scatters; stone structures and buildings; mining claims, cairns, and shallow prospects; and roads and the Rawhide Western Railway associated with mining (including the National Mill), transportation, and settlement of the Rawhide town site (Morris *et al.* 1994; Pendleton *et al.* 1982; Reno and Zeier 2007). Details of past cultural resources work in the immediate area are available in Reno and Zeier (2007).

Based on review of reports on areas inventoried in or near the Denton-Rawhide Mine, the proposed amendment would not impact historic properties. Most resources associated with the town of Rawhide and the National Mill were on patented land and no longer remain. Of the remaining ten cultural resource sites, none are considered historic properties. Therefore, relative to cultural resources, there exists no need to alter the proposed disposal of 425 acres in order to prevent unnecessary or undue degradation.

- **Native American Religious Concerns** – Native American tribes that have cultural affiliation with the area of the Denton-Rawhide Mine are the Walker River Paiute Tribe and the Fallon Paiute Shoshone Tribe. Per 36 CFR Part 800 and 43 CFR Part 8100 (BLM), as amended, a consultation letter with a general summary of the proposed land disposal, and a map locating the proposed 425 acres, were sent to the Tribes on November 14, 2006. During meetings and phone calls since that date, the Tribes have shared with BLM managers some information concerning land sale activities within their aboriginal territory. The Tribes have each stated, in general, that any impacts to cultural resources should be avoided; however to date, no specific Native American religious or heritage concerns relative to the Denton-Rawhide land disposal have been identified. Native American consultation regarding the proposed land sale is ongoing.
- **Threatened or Endangered Species** - Implementation of the Proposed Action would have no affect on threatened or endangered species in the area. Habitat for two Nevada BLM sensitive plant species that may occur in the area (Nevada orocytes and Nevada dune beardtongue), is marginal and they were not found during field surveys (SWCA 1995). No threatened,

endangered, or candidate species of wildlife are known to be present in the area (Mendoza 1996).

- **Migratory Birds** – Migratory birds are present in the area, but species present are common to areas outside of the proposed land disposal site. Acquisition by a private entity may affect some species use of the parcel, but would not affect overall populations in the general area.
- **Wastes, Hazardous or Solid** - Implementation of the Plan Amendment would not result in changes or modifications to existing management of hazardous materials at the Mine site. All permitted facilities, processes, and chemicals at the site would remain the responsibility of KRMC pursuant to Nevada Bureau of Mining Regulation and Reclamation Permit No. 0041. The Nevada Division of Environmental Protection holds a performance bond on the mine complex to ensure closure is completed in accordance with approved plans.

The Denton-Rawhide Mine currently operates as a Conditionally Exempt Small Quantity Generator of Hazardous Waste (less than 100 kg/month) as defined by the Resource Conservation and Recovery Act (as amended, 42 USC §6901 et seq.) under EPA ID No. NVD-982-491-979. Hazardous materials generated at the Mine include fire assay by-products (crucibles and cupels), which are stored in covered 55-gallon drums. Approximately 150 pounds of hazardous waste are generated monthly and periodically shipped by Universal Environmental, Reno, Nevada (EPA ID#NVR000054213) to US Ecology in Beatty, Nevada (EPA ID#NVT3300100000), for disposal.

Chemicals associated with ore processing at the Mine include cyanide, sodium hydroxide (caustic), zinc, and muriatic acid. Cyanide and caustic are stored and contained within bermed concrete pads. Muriatic acid is stored within an HDPE lined containment vessel inside the Truck Shop Building. Petroleum products are stored in above ground storage tanks in bermed, HDPE lined containment areas.

- **Water Quality (Surface/Ground)** - Implementation of the Proposed Action would have no affect on surface or groundwater quality. All drainages in this hydrographic area are ephemeral (i.e., flowing only in response to rainfall events and/or snowmelt runoff). No springs or seeps are known to occur within a six-mile radius of the Denton-Rawhide Mine.

Approximately 2,500 exploration borings have been drilled in bedrock at the Denton-Rawhide Mine to depths of approximately 500 feet, with several borings advanced as deep as 2,000 feet. Groundwater was not encountered in any of these borings. The maximum drilled depth of 2,000 feet corresponds to an elevation of about 2,900 feet amsl therefore; the regional groundwater level in bedrock would be lower than this elevation. Scarcity of groundwater at the mine is a function of relatively low precipitation, high evapotranspiration, and low permeability of bedrock underlying the area. These characteristics result in low local recharge to the deeper groundwater system.

- **Invasive, Nonnative Species** – Invasive, non-native species would not be affected by amending the CRMP to designate disposal of selected public land. No ground disturbing or other activities would occur as a result of the Proposed Action that would result in establishment of invasive, non-native species.

The following resources, which are not Critical Elements of the Human Environment as defined by BLM's Handbook H-1740-1, are present in the area. BLM has evaluated the potential impact of the Proposed Action on these resources and has determined that although the resources are present, they would not be affected by the Proposed Action. Rational for dismissing these resources from further discussion in the document are as follows:

- **Soil** – Implementation of the Proposed Action would have no affect on soil in the area. No ground disturbing activities beyond those currently authorized would occur as a result of the Proposed Action. KRMC would remain obligated to complete reclamation of disturbed areas in accordance with the approved and bonded reclamation plan on file with Nevada Division of Environmental Protection.
- **Vegetation** – Existing vegetation in the area would not be affected by amending the CRMP to designate disposal of selected public land. No ground disturbing or other activities would occur as a result of the Proposed Action that would affect vegetation. KRMC would be required to stabilize and revegetate areas disturbed by mining activities in accordance with their approved and bonded reclamation plan.
- **Wildlife** – No activities would occur as a result of the Proposed Action that would affect wildlife or wildlife habitat in the area. Wildlife would continue to have the same access and use of the area as current conditions allow. The identified area is within pronghorn habitat, though the proposed land sale would likely have little or no effect upon the population since the densities of pronghorn are low in this area. Potential bighorn sheep habitat has been identified in the area by Nevada Department of Wildlife, the proposed land sale would have no effect on bighorn sheep since the area is not occupied and most of the area is marginal bighorn sheep habitat. The proposed land sale is outside of sage grouse management units and does not support sage grouse habitat and therefore would have no affect on sage grouse.
- **Aesthetics (Visual Resources and Noise)** - Implementation of the Proposed Action would have no affect on visual resources and noise in the area beyond the current condition. The existing visual landscape would not change and noise levels would continue at current levels.

The following resources are present in the area and may be affected by the Proposed Action.

GEOLOGICAL RESOURCES

The Denton-Rawhide Mine (including the subject sale area) is located within the Basin and Range Physiographic Province, a region that extends over most of Nevada and portions of adjoining states. Range-front faulting in the province has created block mountain ranges separated by broad valleys filled with alluvium.

Gold and silver deposits of the Denton-Rawhide Mine occur along the northern portion of Walker Lane, a northwest-trending structural zone of the Basin and Range Province. The mine site is located along the margin of a volcanic center comprised of intrusions, flows, and sedimentary deposits. Mineralization of volcanic rocks in the mine area was introduced by a siliceous hot spring system.

Mineral Resource Assessment

A Mineral Report, "*Denton-Rawhide Mine Sale Mineral County, Nevada*" (BLM 2006), was prepared by the BLM Carson City Field Office in November 2006, to determine whether public land within the subject

sale area contains “known mineral value.” The public land proposed for conveyance is situated on 85 unpatented claims or claim fractions currently controlled by KRMC as shown on **Figure 2**. The bulk of KRMC’s facilities are situated in the southern portion of the subject sale area on 23 of these claims. A total of 16 unpatented claim fractions, ranging from less than 0.01 acre to 2.52 acres, are located entirely within KRMC’s patented claim block. The remaining 46 claims are located adjacent to KRMC’s mineral patent holdings.

Gold and silver resource estimates for the 85 unpatented claims and claim fractions within the subject sale area were derived from both published and unpublished reports. The 23 unpatented claims underlying KRMC’s facilities in the southern portion of the subject sale area were condemned prior to facilities construction. The 16 unpatented claim fractions contained within KRMC’s patented claim block are considered uneconomic and difficult to manage because of their limited aerial extent and proximity to open pit disturbances. Resources on the remaining 46 unpatented claims within the subject sale area were estimated using a standard three-dimensional block model previously used for long and short range mine planning at the Denton-Rawhide Mine. That model identified a total of 2,016,411 tons of mineable resource containing 37,032 ounces of gold, and an estimated 370,320 ounces of silver on nine unpatented claims within the subject sale area (BLM 2006).

RECREATION

Public land within the Carson City BLM District provides diverse recreational activities including off-highway vehicle (OHV) use, sightseeing, wildlife viewing, hunting, skiing, photography, rock-hounding, and fishing. The area around the Denton-Rawhide Mine is not intensively used for recreation.

All land administered by the BLM in the Carson City Field Office is designated open except for 18 limited or closed areas. Sand Mountain Recreation Area, approximately 20 miles north of the Mine site, is the nearest recreation site with 2,096 acres limited to designated routes and 50 acres closed.

LAND USE/ACCESS

Land use in the vicinity of the Denton-Rawhide Mine includes mining, military use, grazing, and recreation. KRMC holds or controls mining claims on all public land proposed for sale. Public land proposed for disposal is currently controlled by KRMC (as unpatented claims) and access is restricted for safety purposes. All rights-of-way associated with the Denton-Rawhide Mine for power lines, water lines, telephone lines, and haul roads were included in the original plan of operations and authorized by BLM. An unpaved county road bisects the northern portion of land proposed for disposal. KRMC upgraded and partially relocated this road during mine development with the approval of Mineral County (BLM 1996).

The Mine site is located within the La Beau Flat Grazing Allotment #03035. The Allotment encompasses 155,923 acres and supports 3,680 animal unit months (AUMs) of grazing. Most grazing occurs north and northwest of the Mine. Forage and water are limited south of the Mine site and cattle rarely use this area (BLM 1996).

Access to the site from the town of Fallon is 32 miles east on State Highway 50 to the junction with State Route (SR) 839, then 20 miles south. Access from Hawthorne is 40 miles north on SR 839.

SOCIAL AND ECONOMIC RESOURCES

The socioeconomic Study Area includes Mineral County (the county in which the mine is physically located), Churchill County, the city of Fallon (city and county in which most mine employees live), the unincorporated town of Hawthorne, the Walker River Indian Reservation, and the town of Schurz.

Population Trends and Demographic Characteristics

Between 1990 and 2000 the population of Mineral County decreased 22 percent from 6,475 in 1990 to 5,071 in 2000. The 2005 estimated population of Mineral County was 4,910, approximately 3.2 percent lower than the 2000 population (U.S. Census Bureau - Quick Facts). Hawthorne, the major town in Mineral County, experienced a similar decrease from 3,311 in 2000 to an estimated population of 2,956 in 2005 (The Nevada State Demographer's Office - Nevada County Population Estimates July 1, 1990 to July 1, 2005).

In contrast, the population of Churchill County experienced a 34 percent increase from 17,938 in 1990 to 23,982 in 2000. In 2005, the estimated population of Churchill County was 24,556, approximately 2.4 percent higher than the 2000 population (U.S. Census Bureau - Quick Facts). In 2000, the population of Fallon was 7,536 (2000 Table DP-1). In 2005, the community had an estimated population of 8,103 (U.S. Census Bureau - Cities & Towns / All Places 2000 to 2005). The population within and adjacent to the Walker River Indian Reservation in 2000 was 853 (2000 Table SF-1 - P12).

Community Service Providers

Community services including education, law enforcement, fire protection, ambulance service, health care, water supply, solid waste, and housing have maintained the status quo or have increased commensurate with population levels over the period of record.

Employment

In 2005, all industrial sectors in Mineral County supported 1,736 jobs. The largest employment sector in the county was the Government (585 employees) followed by Leisure and Hospitality (261). Mineral County's largest employers were all located in the City of Hawthorne and consisted of: Day & Zimmerman Hawthorne, El Capitan, Mineral County, Mineral County School District, and Mount Grant General Hospital.

In 2004, Churchill County attributed an average of 248 jobs to the labor category Natural Resources and Mining which also includes agricultural forest related activities and fishing. Employment data for the same period in Mineral County was masked and unavailable for the labor category natural resources and mining (Nevada Employment and Payrolls - 2004, State of Nevada, Department of Employment, Training and Rehabilitation, Research and Analysis Bureau).

During active mining operations, KRMC employed approximately 175 persons. Annual payroll for the Mine averaged \$1.6 million per year and contributions to state and local taxes amounted to approximately \$23.6 million over the life of the project. Current operations are conducted by a staff of seventeen employees and four contractors with an annual payroll of approximately \$970,000. State and local taxes are approximately \$420,000 per year.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

BLM has analyzed potential impacts that could result from implementation of Alternative A - Plan Amendment and Alternative B - No Action Alternative. Implementation of the Plan Amendment would result in sale of 425 acres of public land at appraised fair market value. Implementation of the No Action Alternative would result in no change to the Carson City Consolidated Resource Management Plan. Land proposed for disposal and sale to KRMC under the Proposed Action would remain under administrative control of BLM.

Irreversible and irretrievable commitment of resources and residual adverse effects to the environment resulting from implementation of the Plan Amendment would remain unchanged from those described in the Draft EIS (BLM 1996). Neither BLM nor KRMC have identified any mitigation measures as being necessary for the Plan Amendment.

Direct or indirect impacts to the human and natural environment that may result from sale and transfer of land from the public to private sector are described in this section. For those resources where a direct or indirect impact has been identified, a cumulative effects analysis is included at the end of this section.

GEOLOGICAL RESOURCES

Based on a review of existing literature, public land within the subject sale area are considered to have a low potential to contain an economic deposit of the following resources: coal, oil and gas, geothermal, sodium and potassium, uranium and thorium, non-metallic (industrial) minerals, or common variety minerals. The potential for an economic precious metal deposit within the subject sale area was evaluated in more detail due to the proximity of the sale area to an active precious metal mining operation (BLM 2006).

In applying KRMC's average recovery rates at the Denton-Rawhide Mine to the mineable resources remaining in the subject sale area, approximately 20,312 ounces of gold and 112,463 ounces of silver could be recovered. Recoverable silver was converted to an equivalent amount of gold by applying average commodity prices of \$573.12 and \$11.01 per ounce for gold and silver, respectively, determined by BLM policy. With an ounce of gold being approximately equivalent to the value of 52.05 ounces of silver, total recoverable precious metal value that could be derived from the remaining mineable resources underlying the subject sale area would equate to that of 22,472 ounces of gold (BLM 2006).

A limited economic evaluation was conducted to determine operational and capital costs associated with a theoretical mining and processing operation targeting the remaining resources on public land underlying the subject sale area. Operating costs relate to the actual labor, supplies, and maintenance needed to operate a mine. Capital costs are the "start-up" expenditures that a new operator would incur to purchase mining and milling equipment and develop the necessary infrastructure.

Total operating costs were determined to be \$538.44 per ounce of gold produced. The required capital costs would result in an additional expenditure of \$1,439.44 per ounce of gold produced. Considering the 73-month average gold price of \$573.12 per ounce, a theoretical mining and processing operation targeting the remaining resources would operate at a deficit of \$1,404.76 per ounce of gold produced. Hence, public land underlying the subject sale area is not considered to contain an economic precious metal deposit (BLM 2006).

The Mineral Report (BLM 2006) concluded that “known mineral values” do not exist on public land underlying the subject sale area and that conveyance of the land under the Federal Land Policy Management Act (FLPMA) of 1976 is recommended with no further consideration regarding value of the mineral estate.

RECREATION

Implementation of the Plan Amendment would transfer ownership of 425 acres of public land to private ownership. Given that the tracts included in the land ownership transfer are located within or are immediately adjacent to the Mine area, public access and recreation on these tracts is currently restricted for safety reasons. Adjacent areas are not extensively used for recreation and do not offer unique recreational opportunities. Large areas of similar type land within the Carson City District are available to the public for dispersed recreation. No change in recreational use of the selected public land tracts is expected to result from the change in land ownership.

LAND USE/ACCESS

Implementation of the Plan Amendment would result in sale of 425 acres of public land at appraised fair market value. Public access to the site would continue to be controlled under current authorizations to maintain safety and security around the mine complex. Reclamation and closure of land included in the sale would be in accordance with existing plans approved by Nevada Bureau of Mining Regulation and Reclamation Permit No. 0041. No change in land use and access to the public land parcels included in the land ownership transfer from current conditions is anticipated. Right-of-way for the Mineral County road bisecting the northern portion of the proposed land sale would remain unchanged.

Under the Plan Amendment 425 acres would become unavailable for livestock grazing. This represents a loss of approximately 10 AUMs of active grazing preference, or 0.2 percent from the La Beau Flat Allotment of 3,680 AUMs. Access to range improvements (water tanks) would not be affected by the Proposed Action.

SOCIAL AND ECONOMIC RESOURCES

Implementation of the Plan Amendment and the ultimate sale of the selected land parcels to KRMC would not result in a change in social and economic resources in the Project Area. KRMC would continue with existing leach operations until such time as metal recovery became uneconomical. KRMC would implement the various components of the approved and bonded reclamation of remaining disturbance areas to meet requirements of the reclamation plan for the Denton-Rawhide Mine.

The number of personnel directly employed by KRMC during this phase of the project would continue to decrease as leach operations cease and reclamation is completed. A small staff (approximately five people) would continue to monitor and maintain site conditions until bond release criteria are met.

CUMULATIVE IMPACTS

Cumulative impact as stated in 40 CFR 1508.7 “... is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency [Federal or non-Federal] or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”

Results of cumulative impact analyses determine whether an action contributes to impacts associated with other activities in the area, or results in impacts when added to other activities. Cumulative impact analyses do not consider potential mitigation for reasonable foreseeable actions.

The geographic cumulative impact area referred to in this section varies depending on the resource being discussed. Cumulative impact analysis included in this section is limited to those resources that may be directly affected by implementation of the Plan Amendment.

Past and Present Activities

Mining, livestock grazing, and recreation have been and continue to be dominant land use activities on private and public land in the vicinity of the Denton-Rawhide Mine. Livestock grazing, public access, and recreation have been restricted at the mine for safety and security reasons.

Active mining operations ceased in October 2002 and the majority of mining related equipment has been decommissioned, dismantled, or otherwise removed from the site. Recovery of gold and silver from heap leach operations is ongoing and expected to continue through the next few years (no timeline has been definitively set when leaching is no longer economically feasible).

Reasonably Foreseeable Future Activities

Mine Reclamation

Reasonably foreseeable future activities in the land sale area include reclamation of the Denton-Rawhide Mine area by KRMC in accordance with current permits. Reclamation would restore portions of the land surface and reduce impacts created by mining. The approved reclamation plans require restoration of land uses including wildlife habitat and livestock grazing.

Reclamation would also minimize the visual characteristics of the landscape modified by mining disturbance. Vegetation that resembles natural, undisturbed areas would become established and result in disturbance areas blending with adjacent, undisturbed areas. Highwalls associated with open pits and cuts would remain after reclamation and closure.

Alternative Mine Site Uses

The Rawhide Community Advisory Group comprised of Churchill and Mineral county commissioners, representatives of the community of Gabbs, representatives of the Walker Lake Paiute Tribe, and KRMC have identified opportunities for post-closure use of some of the Denton-Rawhide Mine facilities.

Several options have been developed for potential use of the mine infrastructure and open mine pits that could extend the economic benefit of the Denton-Rawhide Mine property. These optional land uses are identified below:

- Development of an Industrial Park;
 - Alternative energy – development of wind, solar, and/or geothermal power generation facilities. In April 2004, a tower with an anemometer was installed at the Mine site to collect wind data. The data is being processed by the Desert Research Institute and is available on their website (www.wrcc.edu/nsoe/). KRMC and the Rawhide Community Advisory Group continue to work with University of Nevada-Reno, Great Basin Center for Geothermal Energy, and others toward developing renewable energy sources in the region;

- Operation of a Heavy Equipment Training Center.
- Use inactive open pits as potential municipal landfill sites.

Infrastructure currently located in the southern portion of the subject sale area on 23 unpatented claims includes: Truck Shop, Merrill-Crowe Processing Plant, Administration and Technical Training Center, and Geology Shed. Implementation of the Plan Amendment could allow development of alternative post-mine uses of these structures identified by the Rawhide Community Action Group. Implementation of the Plan Amendment could accommodate pursuit of sustainable, post-mine development opportunities that could result in continued and increased employment, training opportunities, and tax revenues for Mineral and Churchill counties, state of Nevada, and federal government.

LAND USE AND ACCESS

Industrial Park

Use of mine infrastructure located on selected land parcels included in this land tenure change to support development of alternative energy systems could result in changes in current land uses in the vicinity of the project area. Installation of wind turbines, solar panels, and/or installation of geothermal wells and infrastructure (generators, powerlines to connect to the power grid, electrical substation installation) would all require modification of the current land use (livestock grazing and wildlife habitat).

Depending on the scale of facilities that could be considered for alternative energy projects, additional land area may be considered to develop a viable project. Adjacent land, including private and public land, may be considered for installation of wind turbines, solar panels, or other systems to support a development. Such uses would further modify land use and access to these tracts as well as adjacent land areas.

Establishment of a heavy equipment training facility would not necessarily involve any adjacent land. Ample space is available within the fee land combined with unpatented claims held by KRMC to support training of heavy equipment operators. Such training would generate emissions from diesel and gasoline-powered equipment and vehicles and fugitive dust emissions would also result from training activities. Dust emissions could be mitigated by proper application of water to road surfaces and wetting soil and rock material used in the training exercises.

Emissions (dust and gaseous) from vehicles associated with a heavy equipment training facility would not likely exceed emissions that were attributable to the site during operation of the mine. To the extent such a training facility would be required to obtain an air quality permit, implementation of mitigation measures to reduce or control emissions would reduce these impacts.

Landfill

Conversion of the existing mine pit at the Denton-Rawhide Mine to a landfill would result in increased traffic across adjacent land from haulage of refuse to the landfill site. Assuming existing roads would be used for haulage, increased amounts of fugitive dust would result from truck traffic. Traffic volume necessary to support landfill operations and roads used for this purpose are not known at this time. Since the potential landfill is located in a remote part of Nevada, generation of dust from truck haulage is not expected to affect any population of people. Road dust can be controlled through use of watering or surface treatments (asphalt, magnesium chloride).

Adjacent land uses include the Walker Lake Reservation and a military training area. All areas within the immediate vicinity of the mine pit/ landfill area are rural settings and no change in land use of these adjacent land areas is expected to result from use of the mine pit as a landfill; assuming that existing county and/or BLM roads are used for transport of municipal waste.

Operation of a landfill would also result in production of landfill gases; most notably methane. Methane production is affected by temperature and moisture conditions in landfills and as such, it is uncertain as the amount of methane that would be produced by a landfill situated in a mine pit.

Licensed landfill operations must be conducted in accordance with applicable regulations of the State of Nevada. Such regulations require, among other items, control of blowing debris, placement of a daily cover over garbage, control over type of refuse placed in the landfill, and monitoring of leachate formation and gas production. Landfill designs require installation of liner systems, leachate collection systems, and gas venting systems.

Landfills attract certain forms of wildlife in response to a food source. Given that the mine pit is located in an area with limited surface water, the number of individuals and species that may frequent the site is uncertain. Attracting these species into the project area as a result of potential landfill operations would not result in changes in adjacent land use or access.

SOCIAL AND ECONOMIC RESOURCES

Industrial Park

Conversion of the ancillary facilities and infrastructure at the Denton-Rawhide Mine to post-closure uses such as an alternative energy park or heavy equipment training facility would create new jobs and livelihoods in an area where employment opportunities are limited. Cessation of mining operations and closure of the mine would result in ending relatively high-paying jobs, the tax base the mine contributed to Mineral County and state and federal tax revenue contributed by KRMC and workers. Continuing or extending use of existing mine facilities including buildings, roads, water supply, electrical supply, and land area to meet a new use would have the net benefit of replacing lost jobs and tax base; at least partially.

Landfill

Operation of a landfill in the mined-out pits at Denton-Rawhide Mine would create jobs and would re-establish an industry that could contribute to the tax base in the project area. Landfill operations may not equal the number employed by KRMC during mining; however, operating a landfill would partially offset losses of tax base and payroll as a result of mine cessation. To the extent that creation of and/or extending jobs and a tax base from the site are viewed as positive impacts, the opportunity to convert infrastructure at the site to serve a new industry would be a net benefit to Mineral County.

CHAPTER 5 CONSULTATION, COORDINATION, AND PREPARATION

NOTICE OF AVAILABILITY OF EA AND FONSI

BLM has determined that there would be no significant impacts associated with the Proposed Action and public review is unnecessary. In accordance with 40 CFR 1508.13 A Finding of No Significant Impact (FONSI) has been prepared and is included in this document.

CONSULTATION WITH OTHERS

The following federal, state, and local agencies were consulted during preparation of the EA:

Board of Mineral County Commissioners

Mineral County Regional Planning Commission

Director of Hawthorne Utilities

Nevada Department of Conservation and Natural Resources

Nevada State Clearinghouse

Rawhide Community Advisory Group

LIST OF PREPARERS AND REVIEWERS

Lead Agency – Bureau of Land Management

Donald T. Hicks – Carson City Field Office Manager

Terri Knutson – Planning & Environmental Coordination

Jo Ann Hufnagle - Realty

James Carter – Cultural Resources/Native American Religious Concerns

Rita Suminski – Wildlife/T&E

Terry Knight – Recreation/Wilderness/VRM

Terry Neumann – Hazardous Materials

James Schroeder – Water Resources

Dan Erbes - Minerals

James deLaureal – Soils/Noxious Weeds

Russ Suminski - Range Resources

Steep Weiss – Forestry

Keith Barker – Fire/Fuels

Third Party E A Contractor

Geomatrix Consultants, Inc.

Project Manager	Terry Grotbo Director/ Mine Services Helena, MT	BS Earth Science/Geology 29 years experience
Assistant Project Manager	Joe Murphy Helena, MT	BA Geography 35 years experience

CHAPTER 6 REFERENCES

- Mendoza, C. 1996.** Letter from U.S. Fish and Wildlife Service, Reno, Nevada to BLM District Manager, Carson City, Nevada. Scoping comments and list of candidate species that may be affected by the proposed land sale.
- Morris, R. and S. Mehls. 1994.** A Class III Cultural Resources Inventory of the Rawhide Mine Project, Mineral County, Nevada. Report on file at the Bureau of Land Management, Carson City Field Office (CRR 3-1601).
- Pendleton, L.S.A., A. R. McLane, and D. H. Thomas. 1982.** Cultural Resources Overview, Carson City District, West Central Nevada. Cultural Resource Series No. 5, Part I. Nevada State Office of the Bureau of Land Management. Reno.
- Reno, R. and C. Zeier. 2007.** An Inventory of Cultural Resources within the Kennecott Rawhide Mine Proposed Land Acquisition Area, Mineral County, Nevada. Report on file at the Bureau of Land Management, Carson City Field Office (CRR 3-2307).
- SWCA, Inc. 1995.** Rawhide Baseline Inventory. Prepared for Kennecott Rawhide Mining Company.
- U.S. Department of the Interior, Bureau of Land Management (BLM). 1996.** Draft Environmental Impact Statement Denton-Rawhide Mine Expansion Project. Carson City District Office. Carson City, Nevada. November.
- _____ **2006.** Mineral Report. Denton-Rawhide Mine Sale Mineral County, Nevada. Carson City Field Office. November.