

RE: Elko County Letter of Support for the Public Safety Exemption per NAC 232.460 for the White Pine and Elko County Roads 1000 and 719 with KG Mining (Bald Mountain) Inc. (KG-BM)

Dear Sagebrush Ecosystem Council Members:

This letter is to express Elko County's support for an exemption to the State of Nevada Conservation Credit System (CCS) associated with the County Road Project (Project) that has been initiated by KG Mining (Bald Mountain) Inc. (KG-BM) during the spring of 2020. The current condition of the two county roads present hazards to public safety as there were over 30 incidents in a period of three years, including collisions with free roaming horses, livestock, wildlife and rollovers among other minor occurrences. The Project is to focus on rectifying the currently hazardous situation on the two county roads and Elko County supports this effort.

Elko County understands there is an exemption from using the CCS under NAC 232.460 when the Project is necessary to protect health and safety. KG-BM has had discussions with Elko County and with the CCS program administrator (CCA PA) bringing forward the request for exemption. Elko County supports this request for an exemption from using the CCS program and is requesting your consideration and approval for this exemption.

The need for the upgrade work is to improve safety via driver visibility and to lessen the potential for accidents and collisions with other vehicles and/or wildlife, free roaming horses and cattle. These actions will promote a reduction in hazards, especially to the local residents and ranch owners, commuters, and recreationists. A total of 26.4 acres are proposed as new disturbance with the majority of the disturbance on Forest Service lands, followed by BLM Ely District lands, then BLM Elko District lands. As part of the project, KG-BM would reclaim about 15 acres.

Elko County accepts and echoes the assertions made by KG-BM regarding this project's potential to improve public safety along this roadway. Protecting the public alone should qualify this project for an exemption to the Conservation Credit System requirements. However, there are other factors the SEC should take into account when considering an exemption for this project.

This Project Will Be Beneficial to Sage Grouse

As stated above, the goal of this project will be to reduce incidents along this roadway, including incidents with wildlife and livestock. Roadkill is among the human provided subsidies that allow for greater than normal raven occupancy in sagebrush habitat.¹ Raven predation is a major source of loss to sage grouse nests and broods.²

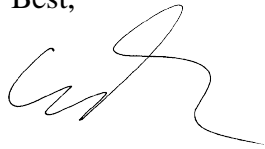
¹ Lockyer, Z. B., Coates, P. S., Casazza, M. L., Espinosa, S., & Delehanty, D. J. (2013). Greater Sage-grouse Nest Predators in the Virginia Mountains of northwestern Nevada. *Journal of Fish and Wildlife Management*, 131023080234000. doi: 10.3996/122012-jfwm-110

² Thuy-Vy D. Bui, John M. Marzluff, Bryan Bedrosian, Common Raven Activity in Relation to Land Use in Western Wyoming: Implications for Greater Sage-Grouse Reproductive Success, *The Condor*, Volume 112, Issue 1, 1 February 2010, Pages 65–78, <https://doi.org/10.1525/cond.2010.090132>

Reducing the amount of roadkill and dead livestock is an established method of reducing raven subsidies and raven abundance.³ Since one of the goals of this project is to reduce the number of vehicle/animal interactions, it follows that the minimal disturbance of 26.4 acres, with 15 acres reclaimed, should be offset by the reduction in raven subsidies.

Because this project is necessary to improve the public health and safety of the users of the roads in question, disturbs a minimal amount of habitat, and has the potential to improve the surrounding habitat by reducing the amount of raven subsidies in this area, it is the position of Elko County that this project should be granted the exemption KG-BM is applying for.

Best,

A handwritten signature in black ink, appearing to be 'C. Moore', written in a cursive style.

Curtis Moore, JD/MS
Elko County Natural Resources Director

³ Dinkins, J. B., Conover, M. R., Kirol, C. P., Beck, J. L., & Frey, S. N. (2016). Effects of common raven and coyote removal and temporal variation in climate on greater sage-grouse nesting success. *Biological Conservation*, 202, 50–58. <https://doi.org/10.1016/j.biocon.2016.08.011>