



Mining – Geological – Hydrological – Environmental – Maintenance

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MEETING OF THE SAGEBRUSH ECOSYSTEM COUNCIL
Friday, April 19, 2024

Public Comment - Item 10. REVIEW AND DISCUSS THE DISPUTE ON VERSION CONTROL BROUGHT FORTH BY ORLA MINING REGARDING SOUTH RAILROAD MINE PROJECT

Program Manager Steele and Council Members,

I speak from nearly fifty years in the mining industry across many states and foreign countries. As a Nevada native, sagebrush is in my earliest memories. The recent thirty years back home include ten as an appointed commissioner on the Elko County Natural Resource Management Advisory Commission. These experiences lead me to concur that sage grouse indeed are evolving – agencies turn them into sage grift.

The February 15, 2024 letter from Orla Mining to the Sagebrush Ecosystem Technical Team presents a tortuous chronology of bureaucratic delay and misinterpretation illustrating onerous and punitive treatment corporations and their employees receive during environmental permitting processes. And that in Nevada, globally the jurisdiction consistently ranked as the most favorable or among the most favorable for mine permitting.

Four years after initiating the NEPA process by assigning a case file for the South Railroad Project, the BLM and State maintain the process has not begun, with further stipulation that previous work is subject, retroactively, to regulatory revisions. In the Orla Mining letter, those logical and legal incongruities are properly termed as leading to a regulatory death spiral – Catch-22's estimated to increase the project costs far past viability.

Coincidentally on February 15, I submitted public comment on BLM's proposed mining performance metrics. Those intend to measure the performance of permit applicants. The South Railroad Project matter strongly supports my career experience and earlier public statement that agency performance – apparently lack of – drives permit timelines. Applicants need efficient and reliable processes, working as quickly as engineering and scientific analyses allow. Conversely, agencies thrive on procedures, in both number and complexity. Consistently, agencies do not achieve efficiency and performance increases, but evidently strive to achieve permit scope and budget increases. It is agency performance that should be measured and reported to the taxpayer, since agencies control the permitting arena while consuming taxpayer funds and restricting family livelihoods.

Respectfully submitted,

- Ralph R. Sacrison, PE, SME-RM

Xc: Don Dwyer, Glenn King (Orla Mining); James Settlemyer, Dominique Etchegoyhen (DCNR); Ryan Cherry (Governor's Chief of Staff); Tim Robb (Strategic Initiatives & Rural Liaison); Nikki Bailey-Lundahl, Kyle Davis (NVMA)