



JOE LOMBARDO
Governor

STATE OF NEVADA

DEPARTMENT OF WILDLIFE

6980 Sierra Center Parkway, Suite 120

Reno, Nevada 89511

Phone (775) 688-1500 • Fax (775) 688-1595

ALAN JENNE
Director

JORDAN GOSHERT
Deputy Director

CALEB MCADOO
Deputy Director

MIKE SCOTT
Deputy Director

January 16, 2026

Lance Brown, District Manager
USFS, Austin-Tonopah Ranger District
1400 S Erie Main St
PO Box 3940
Tonopah, NV 89049

Re: Kinross Pegasus Mineral Exploration Project Draft Environmental Assessment (EA); Proposal #68901

Dear Mr. Brown:

The Nevada Department of Wildlife (the "Department") thanks you for the opportunity to provide public comment on this proposed exploration project. The Department understands Kinross Gold USA, Inc. (Kinross) is proposing to conduct mineral exploration related activities on U.S. Forest Service-administered lands (USFS), approximately two (2) miles northeast of the town of Manhattan in Nye County, Nevada. A phased approach to exploration activities is proposed, together creating up to 140 acres of surface disturbance within the 7,600-acre Project Boundary (Project). Comments specific to the EA and Wildlife Biological Evaluation are detailed below.

Federal Special Status Species – Wildlife (Pages 25-27)

- All birds protected under the Migratory Bird Treaty Act are also State Protected (NAC 503.050).
- The peregrine falcon (*Falco peregrinus*) is further classified as sensitive as opposed to endangered. Please correct in the document.
- Please include a species list that identifies the 30 species of migratory birds observed during the bird point-count survey.
- Please include a list of bat species detected during acoustic bat surveys. All bats in the order Chiroptera are protected by State Law (NAC 503.030).
- A brief discussion concerning Townsend's big-eared bat is recommended in the EA. The Wildlife Biological Evaluation indicates a 100-meter avoidance buffer is required to minimize disturbance to roosts and/or hibernacula. This buffer is part of the justification of the determination of may impact but not likely to trend. Note, an acoustic survey alone, particularly during the summer warm season, is not sufficient to assess individual mine/caves potential for hibernacula, maternity roosting, or general day roosting. Because Townsend's big-eared bat

(*Corynorhinus townsendii*) has been documented in the project area, the Department recommends the 100-meter buffer be formally developed as an Environmental Protection Measure (EPM) with supporting narrative and maps in the EA depicting all mine/cave features within the Project.

Special Management Area Considerations (Page 39)

The Project appears to overlap with the Bald Mountain Wash Research Natural Area. The Department understands that Forest Service Research Natural Areas (RNAs) are intended to be protected and maintained in their natural condition and should support natural processes. Please address the Bald Mountain Wash RNA proximity to the Project and whether or not surface disturbance will occur within the RNA.

Pertinent Executive Orders (Page 39)

Please clarify why Executive Order 13443 (Facilitation of Hunting Heritage and Wildlife Conservation) does not apply to the Project.

Appendix B Environmental Protection Measures (Pages 54 and 55)

The Department appreciates Kinross' commitment to EPMs designed to eliminate or reduce the level of potential impact from the proposed mineral exploration activities on wildlife. The Department offers the following supplemental and/or additional EPMs for consideration in development of the Final EA:

- Migratory birds: Clearance surveys and nest buffers should be developed in coordination with the Department and U.S. Fish and Wildlife Service (USFWS).
- Golden eagle (*Aquila chrysaetos*): Eagles have specific requirements for buffer distances and duration of seasonal avoidance compared to raptors, please develop a separate EPM.
- Pinyon jay (*Gymnorhinus cyanocephalus*): Develop an EPM for pinyon jays as:
 - This is a colony nesting species with nests widely spaced over tens to hundreds of acres. An appropriate avoidance buffer of the nest colony is 1000m (0.6 mile) for projects involving high level of human activity such as OHV trails, industrial development projects, road building, and similar activities (Somershoe et al, 2020, Conservation Strategy for the Pinyon Jay).
 - There are numerous survey protocols for pinyon jays each with different applicability to project/NEPA requirements. Many protocols are undergoing periodic revisions. Please coordinate with the Department and/or USFWS for the latest recommended survey protocol.
- Bats: The Wildlife Biological Evaluation states that direct effects to bats can be minimized by reducing vehicle speeds and protecting roosts or hibernacula with a 100-m avoidance buffer. The Department recommends formally developing these bat protection measures as an EPM.

The following comments pertain to the analysis presented in the Wildlife Biological Evaluation:

Section 3.3 Nevada Department of Wildlife (Page 3)

The Department's data response letter is a query of databases of known wildlife occurrences within a given geographic area. It should not be considered as a

comprehensive inventory of wildlife resources or analysis of the area, project impacts, or otherwise.

Section 7.2.3 Peregrine Falcon (Page 13)

As noted previously, the peregrine falcon is State protected and further classified as sensitive as opposed to endangered. Please correct.

Section 7.2.8 Bighorn sheep (Page 17)

Bighorn sheep collaring data indicates the Project is within bighorn sheep lambing habitat and in a seasonal movement corridor. The Department recommends no surface disturbing activities from mid-March through mid-May, which approximates the lambing period. The Department requests further coordination with the USFS and Kinross in developing an EPM specific to bighorn sheep.

Appendix A Screening Analysis of Special Status Species (Page 6)

Flammulated owls (*Psiloscops flammeolus*) have been documented in central Nevada at Morgan Creek in the Monitor Range. An individual owl was caught in bat mist nets as part of the 2017 Bat Blitz hosted by the Department with participation by USFS Staff. This observation is documented in the summary report prepared by the Department and distributed to participating partners.

Thank you again for this input opportunity. For additional assistance, please contact Habitat Division Biologist Tracy Kipke by email at tkipke@ndow.org.

Sincerely,

 for:
Bryan Hamilton
Southern Region Supervisory Biologist
Nevada Department of Wildlife, Habitat Division
3373 Pepper Lane
Las Vegas, Nevada 89102
bryan.hamilton@ndow.org, 702.668.3960

References

Somershoe, S. G., E. Ammon, J. D. Boone, K. Johnson, M. Darr, C. Witt, and E. Duvuvuei. 2020. Conservation Strategy for the Pinyon Jay (*Gymnorhinus cyanocephalus*). Partners in Flight Western Working Group and U.S. Fish and Wildlife Service.