



Great Basin Resource Watch

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Working with Communities to Protect Their Land, Air, and Water

January 18, 2026

District Ranger
Humboldt-Toiyabe National Forest
Austin-Tonopah Ranger District
1400 S Erie Main St.
Tonopah, NV 89049

Re: Comments on *Draft Environmental Assessment, Pegasus Mineral Exploration Project (Proposal #68901)*

GBRW submits the following comments on the Draft Environmental Assessment and Finding of No Significant Impact (FONSI) for the proposed Kinross Pegasus Exploration Project.

We recognize that the Project would disturb approximately 140.1 acres over a 10-year period within a 7,600-acre project boundary, and that disturbance could occur anywhere within that boundary, via a phased exploration program and Work Plans submitted to the Forest Service and NDEP/BMRR.

Water Resources

Baseline Characterization and Aquifer Connectivity

The EA concludes that “impacts to water resources, surface or ground, would be unlikely to occur,” relying heavily on Nevada Administrative Code requirements for drill-hole construction and plugging, and on the assertion that the local volcanic units have extremely limited permeability and lack a hydrogeologic connection to Manhattan’s municipal wells.

However, the EA does not present a clear, project-specific hydrogeologic baseline for the Project Area itself. For example:

- Groundwater elevations, gradients, and hydraulic properties in the immediate Project Area appear to be poorly constrained.
- The EA acknowledges that important hydrogeologic information (water table levels, lost circulation zones, voids, etc.) “would be recorded at each drilling location” but does not

commit to analyzing or disclosing that data in a way that would inform adaptive management or future NEPA review.

Given the proposed drilling depths (up to 2,500 feet, with as many as five holes per pad and up to 250 drill sites total), and the explicit recognition that lost circulation zones, artesian conditions, and historic mine voids may be encountered, the risk of inadvertently connecting discrete water-bearing zones is more than de minimis.

Water Resources

The EA notes that there is one perennial spring and one intermittent spring within the Project Area, and that drilling activities would avoid all springs and seeps. It also states that sumps will fully contain drilling fluids and cuttings, and that no water or drilling effluent will be allowed to flow uncontrolled from sumps, with BMPs in place for any unlikely discharges.

However:

- The EA does not identify specific buffer distances around the known springs and any mapped ephemeral channels.
- There is no clear storm-event inspection protocol to verify that roads, pads, and sumps are not contributing sediment to downslope areas.
- The EA does not commit to any spring-flow or water-quality monitoring to confirm the conclusion that surface waters “are unlikely to be impacted.”

Given the lack of clarity as to several aspects of these spring sites, a thorough baseline documentation of these and any other potential water features should be conducted before disturbance, with minimum mapped buffers included.

Wildlife

Pinyon Jay

The Project Area is dominated by pinyon-juniper woodland, sagebrush shrublands, and salt desert scrub, all of which support diverse migratory bird communities. The EA indicates that LANDFIRE and NDOW State Wildlife Action Plan data were used, and that wildlife baseline surveys were conducted, but it does not provide a substantive, project-specific analysis of pinyon jay habitat use, despite this species’ strong association with pinyon-juniper and its recognized conservation concern in Nevada. Planned activities that could affect pinyon jays include:

- construction and use of up to ~83 acres of constructed roads and pads in Phase I, with additional disturbances in subsequent phases;
- limbing or removal of up to approximately 700 live trees to accommodate access; and
- 24-hour drilling operations with continuous human presence, vehicle traffic, and noise.

The EA does not evaluate whether this combination of disturbance, tree removal, and noise could displace pinyon jay flocks, reduce caching or nesting habitat, or fragment movement corridors. Nor does it commit to any pinyon-jay-specific survey or monitoring.

Golden Eagle

The EA correctly identifies golden eagles as a key special-status species and notes that aerial raptor/eagle surveys were conducted within a 10-mile radius of the Project Area, documenting nests both within the Project Area and in the broader landscape. The analysis appears to focus on nest locations and a one-mile disturbance buffer with seasonal timing restrictions under the Bald and Golden Eagle Protection Act (BGEPA). However, several important issues remain under-analyzed:

- It is unclear whether historic territories, alternate nests, or inactive nests will be afforded the same buffer protections as active nests during Project implementation.
- The EA does not discuss foraging habitats, flight corridors, or topographic shielding, even though many roads and pads are located along ridges or slopes likely used by foraging eagles.
- The Project anticipates 24-hour drilling with lighting, but the EA does not meaningfully analyze the potential for night lighting and continuous noise to disturb roosting or foraging behavior, particularly where rigs and light plants are elevated.

NEPA Compliance

The Preliminary Environmental Assessment as structured proposes several Phases with associated discrete disturbance acreages. The current Phase I proposes 83.3 acres of disturbance, with the remaining 56.8 acres of proposed disturbance to be identified at a later time from Phase I results. Will subsequent phases and associated surface disturbances have to be publicly noticed or have assessments done for cumulative impacts? Presently, this plan leaves out specifics of impacts for the majority of surface disturbance that will be related to the project. The location of subsequent phased activities will also be contingent on the success of previously completed exploration or baseline data collection activities - the lack of clarity as to siting of surface disturbance is problematic.

BLM Failed to Fully Analyze All Reasonably Foreseeable Future Actions

As noted above, it is determined that 140.1 acres will also be disturbed. It is clear that this disturbance is foreseeable, and must be analyzed under NEPA. The EA claims that the specific locations of the additional disturbance are yet to be determined and therefore cannot yet be analyzed is merely an indication that the EA is premature. Given that the number of additional acres is very specific BLM must have enough information to analyze potential impact from the foreseeable explorations. In any event the actions are reasonably foreseeable and cannot be ignored in the EA as is done here.

Thank you for the opportunity to submit these comments. Please contact John Hadder if you have any questions, and we look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "John Hadder". The signature is written in a cursive style with a large, looping "J" and a stylized "H".

John Hadder
Director, Great Basin Resource Watch