

Burnt Rock Exploration Project Comments

To: District Ranger Aaron Coogan, Bridgeport Ranger District

Re: Burnt Rock Exploration Project Draft Environmental Assessment

I oppose the Burnt Rock Exploration Project as proposed.

I am personally familiar with the project area and have spent time in the exact portions of the Bodie Hills that would be affected by this proposal. Based on my observations, the area provides important wildlife habitat and contains some of the most intact and valuable landscapes remaining in the Bodie Hills region.

I have personally observed mule deer, sage grouse, and numerous other bird species within the project area. The Draft Environmental Assessment should provide a more thorough analysis of how up to 600 drill pads, 45 miles of temporary roads, lay-down areas, vehicle traffic, drilling noise, and repeated seasonal disturbance over ten years will affect wildlife use of the area. The Forest Service should specifically analyze impacts to sage grouse habitat, seasonal wildlife movements, nesting and brood-rearing habitat, and mule deer use of the area.

I am also concerned that the Draft EA does not appear to adequately disclose the project's water requirements. Before any decision is made, the Forest Service should require the applicant to identify:

- The exact source or sources of all water that will be used throughout the project.
- The maximum and anticipated annual quantities of water required.
- The method of water transport and storage.
- Potential impacts to groundwater, springs, seeps, and wildlife water sources.

Without this information, the public cannot adequately evaluate the project's impacts.

The road analysis should also be strengthened. The Forest Service should require the applicant to identify every road that will be used during the project and limit access exclusively to those roads specifically analyzed and approved. I am concerned that old abandoned routes and historic mining roads may be used opportunistically during project operations and then not be included in reclamation requirements. Any road used by the project, whether newly constructed or previously existing, should be mapped, monitored, and reclaimed if project activities result in its degradation or expansion.

I am particularly concerned about the adequacy of the proposed reclamation measures. The Draft EA states that disturbed areas will be reseeded with approved seed mixes. However, experience from other reclamation projects in Nevada has shown that inappropriate seed mixes can be approved and used, including non-local sagebrush varieties and weed-contaminated seed sources. In some cases, agencies have justified these outcomes by claiming that the same weed species

already existed in the area. Such reasoning is unacceptable and does not restore native ecological conditions.

The Forest Service should require:

- Use of locally appropriate native plant materials derived from the same ecological region.
- Independent verification that all seed sources are free of invasive and noxious weed contamination.
- Detailed revegetation performance standards.
- Long-term monitoring sufficient to demonstrate successful restoration of native vegetation communities.
- Mandatory corrective actions if revegetation goals are not met.

The agency should also disclose how reclamation success will be measured and for how many years reclaimed sites will be monitored. Simply seeding disturbed areas should not be considered successful reclamation if native plant communities fail to establish or invasive species become established.

More broadly, I am concerned that the Draft EA understates the cumulative impacts of industrial-scale exploration across one of the most scenic, ecologically intact, and wildlife-rich portions of the Bodie Hills. Although described as an exploration project, the proposal would authorize extensive disturbance over a ten-year period. Once drill pads, roads, and industrial activity are introduced into this landscape, many of its wildlife, scenic, and recreational values may be permanently diminished despite later reclamation efforts.

For these reasons, I urge the Forest Service to deny the proposed action or, at a minimum, require substantial reductions in disturbance, stronger protections for wildlife and habitat, detailed water-use disclosures, stricter road-use limitations, and significantly more rigorous reclamation standards before any decision is made.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Devin Allen". The signature is fluid and cursive, with a long horizontal stroke at the end.