

ENGINEERING • PLANNING • RESOURCE MANAGEMENT  
**RESOURCE CONCEPTS, INC.**

340 N. MINNESOTA ST. • CARSON CITY, NEVADA 89703-4152 • OFFICE: 702-883-1600 • FAX: 702-883-1656

May 8, 1996

Dear Interested Public,

The Bureau of Land Management is currently considering the construction of a fence, pipeline, and two stockwater troughs in the Dry Hills Pasture of the Bullhead Allotment in the Winnemucca District. These projects were initiated to mitigate impacts of the Twin Creeks Mine Development.

Resource Concepts, Inc. has been asked to develop third party Environmental Assessments for these projects in order to expedite the permitting process. I have enclosed two Environmental Assessments; one for the fence and one for the pipeline/troughs. They are transmitted together as they are companion projects.

If you have any concerns or comments on these projects, please provide them to me by May 28, 1996, so that they can be incorporated into the project planning. I will transmit all comments received to the Winnemucca District for consideration.

If you have any questions, please contact me at (702) 883-1600, or Gene Seidlitz, BLM Range Conservationist, at (702) 623-1500.

Sincerely,

C. Rex Cleary  
Certified Range Management Consultant

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enclosures

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**DRAFT**  
**May 8, 1996**

**ENVIRONMENTAL ASSESSMENT  
NEW ROAD PIPELINE**

**I. Introduction/Overview**

**Purpose and Need**

The proposed pipeline is a companion project to the Kelly Creek Spring Fence. The pipeline would provide water on both sides of the fence at the south end. The pipeline and fence are located in the SE corner of the Dry Hills Pasture, Bullhead Allotment. The need for both the fence and the pipeline is created by the expansion of the Twin Creeks Mine into the Bullhead Seeding Pasture. The mine expansion has rendered the Bullhead Seeding pasture virtually useless for livestock management as it has traditionally been used by the grazing permittee, Nevada First Corporation (NFC). The new, small pasture created by the Kelly Creek Spring Fence would be used to replace the Bullhead Seeding Pasture. The seeding pasture has formerly served as a hub to improve livestock management and grazing practices on surrounding rangelands. Livestock, wild horses, and wildlife need water on both sides of the south end of the new fence, hence this proposed pipeline.

This action is in conformance with the Paradise-Denio Resource Area Land Use Plan.

**II. Proposed Action and Alternative**

**Proposed Action**

The proposed action is to construct a pipeline located as shown on the attached map. The new pipeline would tie into an existing SFPGC pipeline for the source of water. The pipeline would be placed on the north side of the old county road in the road construction disturbance zone. From the existing pipeline it would follow the county road southeast and

downhill approximately ½ mile. Thence, it turns east and continues for about 2/3 mile until it intersects the Kelly Creek Spring fence.

The total length of the pipelines is 6,500 ft. The elevation at the pipeline beginning is 5,200 ft. At the end, the elevation is 5,125 ft. The pipeline goes through a swale with a low elevation point of 5,100 ft.

Two stockwater troughs would be constructed where the pipeline intersects the Kelly Creek Spring Fence - one trough on each side of the fence. Small animal/bird escape ramps would be installed on both troughs

This pipeline project would be implemented under a cooperative agreement with the BLM, NFC, and SFPGC. The environmental clearances are being prepared by a third party and funded by SFPGC; final approval authority rests with BLM; design and construction would be funded by SFPGC; and the maintenance responsibility would lie with SFPGC during the life of the Twin Creeks Mine. After termination of the mine, the maintenance responsibility would be NFC. The source of water would be an existing pressurized SFPGC stockwater pipeline.

**No Action Alternative**

The pipeline would not be constructed.

III. Affected Environment

The pipeline is located in a sagebrush-grass vegetation type immediately north of the Twin Creeks Mine. Topography is gently undulating with the pipeline descending 100 feet in elevation and then climbing back up 25 feet in its 6,500 foot length. Affected washes are intermittent and flow only slightly during spring runoff and intense rainstorms.

Technically, the pipeline and troughs are not in a Wild Horse Herd Management Area as the southern boundary of a Herd Management Area lies a couple miles to the north. However, the boundary is unfenced, so Wild Horses have access to the vicinity as a practical matter.

A Class III cultural inventory of the proposed project area, CR2-2093 (P) was conducted in 1986 (Burke)<sup>1</sup>. Cultural resources were not located along the route of the proposed pipeline, nor were any such resources found in the area where the troughs would be situated.

The proposed action is located within a Class IV visual resource management (VRM) area.

Consult the Paradise-Denio Grazing EIS for a more complete description of the environment.

The following critical elements of the human environment are not present or are not affected by the proposed action: air quality, areas of critical environmental concern, prime or unique farmland, floodplains, Native American religious concerns, paleontological resources, wastes (hazardous or solids), water quality, wetlands/riparian zones, wild and scenic rivers, wilderness, and threatened, endangered, or candidate species.

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<sup>1</sup> Burke, Thomas "Cultural Resource Inventory and Preliminary Assessment of the Gold Fields Operating Comp. - Chimney Creek Project." Archaeological Resource Services, Gold Hill, NV 1986. BLM Cultural Resource Report 2-2093 (P).

Native American Consultation is in progress in conjunction with the EIS for the Twin Creeks Mine.

IV. Environmental Consequences

Proposed Action

Construction of the pipelines would result in disturbance of vegetation and disturbance and compaction of soils at the construction sites.

No cultural resources are present in or adjacent to the proposed project area. As a result, the proposed project would have no effect on resources listed on, or eligible to the National Register of Historic Places.

The two (2) water troughs would make water available for both wildlife and wild horses on a year-round basis.

No on the ground field investigation was conducted for sensitive plants. However, according to the Nevada Threatened and Endangered Plant Map book, as updated, no sensitive plants have been observed in the proposed project area. The proposed action would have no adverse action to sensitive plants.

Construction of the pipeline could have a potential impact to the following sensitive animal species which are currently proposed for listing as either threatened or endangered.

Pygmy rabbit  
Small-footed myotis  
Fringed myotis

Spotted bat  
Long-eared myotis  
Long-legged myotis

Pacific townsend's big-eared bat

Western burrowing owl

Of these species, the Western burrowing owl and the pygmy rabbit have the highest probability of experiencing effects as a result of construction activities.

The Western burrowing owl is a small underground nesting bird of prey which lives in colonies inside abandoned rodent and small mammal dens. Potential impacts to this species from construction of the fence include possible damage to burrow entrance by construction vehicles along with temporary displacement of broods. This impact has a low probability of occurring due to the scattered distribution of the species and the likelihood that construction vehicles would not knowingly drive into the den opening. The opening appears as an obvious hole in the ground which is well marked by whitewash excrement from the colony.

Following construction, any resident owls would experience a positive benefit from the creation of a new series of perching areas.

The pygmy rabbit exists in sagebrush/grass communities and is therefore widely distributed. Potential impacts to the pygmy rabbit during construction of this fence are from short-term damage to vegetation by construction vehicles along with temporary displacement of the young. These impacts would be short term and would occur over a small area relative to the entire community and are therefore not considered to be significant.

The proposed action is located within a Class IV Visual Resource Management (VRM) area. Visual resources were considered in the analysis of the project and were determined not to be impacted by the proposed action. Therefore, a VRM worksheet was not completed.

**No Action Alternative**

The pipeline would not be constructed and the impacts of the Twin Creeks Mine expansion on the Nevada First Corporation livestock grazing operation would go unmitigated.

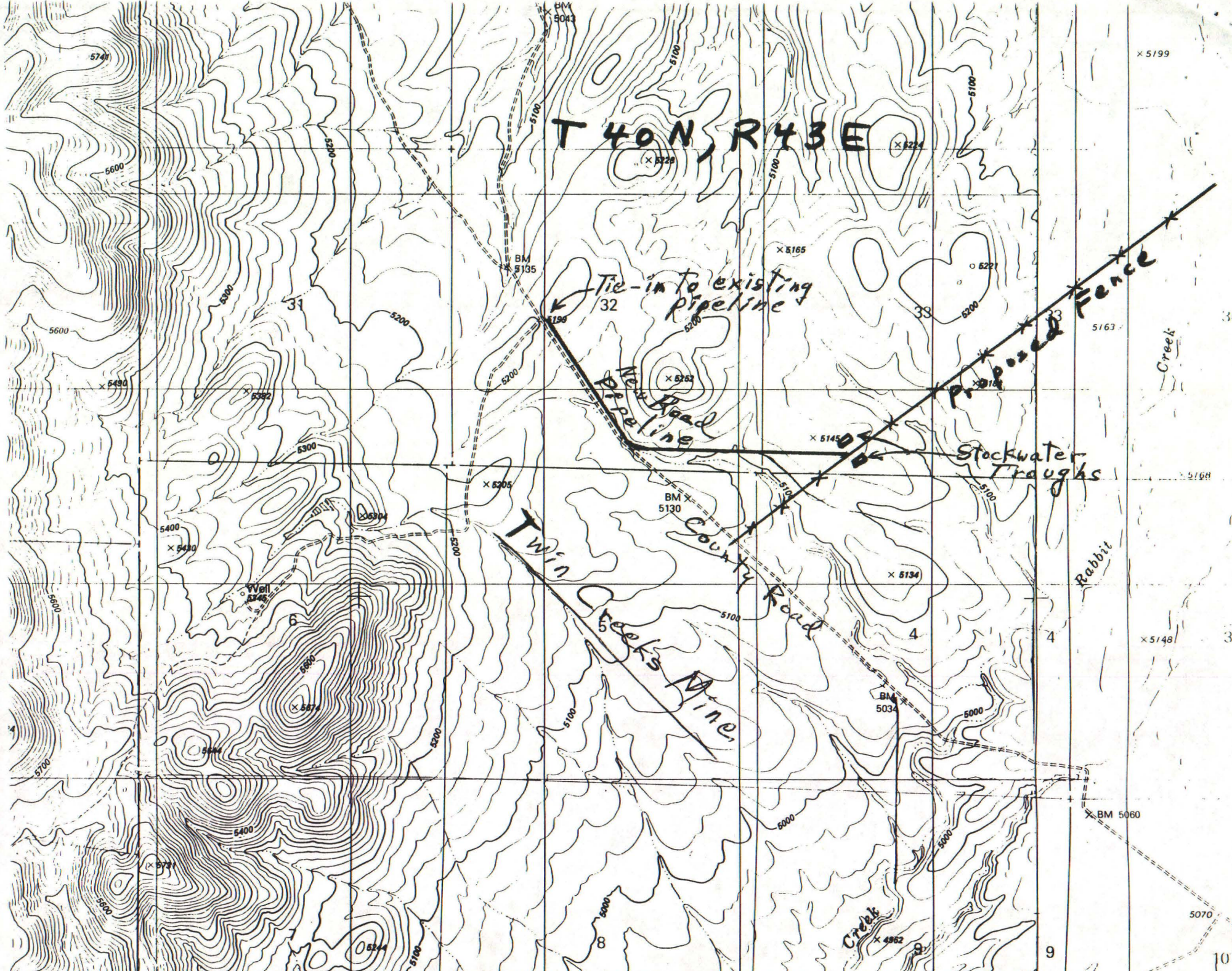
**Cumulative Impact Analysis**

All resources have been evaluated for cumulative impacts. It has been determined that cumulative impacts would be negligible as a result of the proposed action.

**V. Specialist Coordination/Concurrence/Comments**

The specialists who have signed the face sheet of this document have been involved in the development and review of the proposed project and concluded it would not significantly impact their resources.

The permittee, NFC, along with Twin Creeks Mine, has been involved in the coordination of the proposed fence construction.





**Environmental Assessment  
Kelly Creek Spring Fence**

I. Introduction/Overview

Purpose and Need

The proposed action is to create a small pasture (approximately 4,500 acres) in the SE corner of the Dry Hills Pasture which is located in the Bullhead Allotment. The need is created by the expansion of the Twin Creeks Mine into the Bullhead Seeding, rendering it useless for livestock management. The proposed action would be used to replace the Bullhead Seeding Pasture. The pasture would improve livestock management/facilitation and grazing practices on surrounding rangelands.

This action is in conformance with the Paradise-Denio Resource Area Land Use Plan.

II. Proposed Action and Alternative

Proposed Action

The proposed action is to construct approximately 15,000 feet of new fence from Kelly Creek Spring on the north end located in Section 26, T.40 N., R.43 E., southwest to the Twin Creeks Mine perimeter fence in the NE $\frac{1}{4}$ NE $\frac{1}{4}$  Sec. 5, T.39 N., R.43 E., (see attached map). A cattleguard would be located where the fence crosses the County Road. The fence would consist of four strands of fence wire, steel posts, wooden or steel pipe panels and would be built to bureau antelope specifications (16", 22", 28" and 40", top three wires barbed, bottom wire smooth). Five gates would be installed: one at the mine perimeter fence, three between the cattleguard and Kelly

Creek Spring, and one at Kelly Creek Spring. With the exception of the north 600' at Kelly Creek Spring, the contractor would be allowed to knock down brush along the proposed route, but the surface would not be cleared. Access to construction site would be by existing roads in the allotment and by cross country travel.

For the north 600' of fence at Kelly Creek Spring, the fence would be located on an existing road so it is on previously disturbed ground. Low impact construction methods would be used with only metal posts set by hand. No off-road vehicle use would occur other than a small four-wheel all terrain vehicle.

The fence would be scheduled for construction in the summer of 1996. Construction would be by contract issued and paid for by the Twin Creeks Mine with BLM review and approval.

The permittee, Nevada First Corporation, would be assigned maintenance responsibility for this fence.

#### No Action Alternative

The fence would not be constructed

### III. Affected Environment

The proposed fence would be located in a sagebrush-grass vegetation type. Topography is flat to undulating with gentle hills, ridges and washes occurring along the route of the proposed action.

Washes in the area are intermittent and flow only during spring snowmelt and intense rainstorms.

The proposed fence would be located within a Class IV Visual Resource Management (VRM) Area.

Cultural resource inventories have been conducted that address the area of the proposed action (CR2-2567-P and CR2-2568-P). Results of those inventories indicate that four resources are present in the general vicinity of the proposed fenceline. Of those, two are recommended National Register Eligible (CRNV21-768 and 5885) and two are not eligible (CRNV 21-2890 and 5895).

The proposed fence extends into a Wild Horse Herd Management Area for about .5 mile. A small portion of the HMA would be isolated from the rest of the HMA.

Please consult the Paradise-Denio Grazing EIS for a more complete description of the affected environment.

The following critical elements of the human environment are not present and/or not affected by the proposed action or alternatives: air quality, areas of critical environmental concern, prime or unique farm lands, flood plains, threatened or endangered species. Wastes--hazardous or solid--, water quality, wetlands/riparian zones, wild and scenic rivers, wilderness, and paleontological resources.

Native American Consultation is in progress in conjunction with the EIS for the Twin Creeks Mine.

IV. Environmental Consequences

Implementation of the proposed action would result in a new pasture/holding facility for the livestock operation on the Bullhead Allotment.

Construction of the fence would cause some short-term damage to vegetation from crushing, trampling, and breaking during construction.

The proposed fence construction would be built to antelope specifications; thus, there would be minimal adverse impacts to wildlife.

Wildlife use in the vicinity of the project area is limited to low density, intermittent mule deer use and year around use by a variety of small non-game species.

No on-the-ground field investigation was conducted for sensitive plant species. However, according to the Nevada Threatened and Endangered Plant Map Book as updated, no sensitive plants have been observed in the project area.

Construction of the Kelly Creek Spring Fence could have a potential impact to the following sensitive animal species which are currently proposed for listing as either threatened or endangered.

Pygmy rabbit

Spotted bat

Small-footed myotis

Long-eared myotis

Fringed myotis

Long-legged myotis

Pacific townsend's big-eared bat

Western burrowing owl

Of these species, the Western burrowing owl and the pygmy rabbit have the highest probability of experiencing effects as a result of construction activities.

The Western burrowing owl is a small underground nesting bird of prey which lives in colonies inside abandoned rodent and small mammal dens. Potential impacts to this species from construction of the fence include possible damage to burrow entrance by construction vehicles along with temporary displacement of broods. This impact has a low probability of occurring due to the scattered distribution of the species and the likelihood that construction vehicles would not knowingly drive into the den opening. The opening appears as an obvious hole in the ground which is well marked by whitewash excrement from the colony.

Following construction, any resident owls would experience a positive benefit from the creation of a new series of perching areas.

The pygmy rabbit exists in sagebrush/grass communities and is therefore widely distributed. Potential impacts to the pygmy rabbit during construction of this fence are from short term damage to vegetation by construction vehicles along with temporary displacement of the young. These impacts would be short term and would occur over a small area relative to the entire community and is therefore not considered to be significant.

The proposed fence extends into a Wild Horse Herd Management Area for about one-half mile. A small portion of the Herd Management Area lying to the south and east of Kelly Creek Spring would be isolated from the rest of the Herd Management Area by the fence. Water would be

available at each end of the fence in the Dry Hills Pasture side which would also be available for wild horses.

A few wild horses have strayed south from the HMA into the Rabbit Pasture. The proposed fence would constitute one more barrier between the present location of the horses and their proper location. The stray horses would be returned to the HMA in connection with fence construction. In addition, steps would be taken to assure all other wild horses are on the proper side of the fence before it is closed off during construction.

Cultural resource inventories have been conducted that address the area of the proposed action (see CR2-2567[P] and CR2-2568[P]). Results of those inventories indicate that four resources are present in the general vicinity of the proposed fenceline. Of those, two are recommended National Register Eligible (CRNV21-768 and 5885) and two are not eligible (CRNV21-2890 and 5895). Whereas it should be possible to avoid CRNV-21-5885, the proposed fenceline would extend across a portion of CRNV 21-768.

An archaeologist familiar with CRNV-21-5885 shall review final fenceline staking prior to the onset of construction to ensure that the property would not be encroached upon by any such construction.

Construction of that portion of the fenceline located within the boundary of CRNV 21-768 would be accomplished using low-impact construction methods; metal posts would be set using hand tools only. Within CRNV 21-768, the fenceline will follow an existing road so the fence is located in a disturbed roadbed. No off-road vehicle use other than a small four-wheel all-terrain vehicle, would occur within the bounds of the property.

The proposed action would be located within a Class IV Visual Resource Management (VRM) Area. Visual resources were considered in the analysis of the project and were determined not to be impacted by the proposed action. Therefore, a VRM worksheet was not completed.

No Action Alternative

The fence would not be built and the impacts of the Twin Creeks Mine expansion on the Nevada First Corporation livestock grazing operation would go unmitigated as to the loss of the Bullhead Seeding Pasture.

Cumulative Impact Analysis

All resource values have been evaluated for cumulative impacts. It has been determined that cumulative impacts would be negligible as a result of the proposed action or alternatives.

V. Specialist Coordination/Concurrence/Comments

The specialists who have signed the face sheet of this document have been involved in the development and review of the proposed project and concluded it would not significantly impact their resources.

The permittee, Nevada First Corporation along with Twin Creeks Mine, has been involved in the coordination of the proposed fence construction.







**COMMISSION FOR THE  
PRESERVATION OF WILD HORSES**

255 W. Moana Lane

Suite 207A

Reno, Nevada 89509

(702) 688-2626

June 7, 1996

Mr. Pete Christensen  
Paradise-Denio Resource Area  
Bureau of Land Management  
5100 East Winnemucca Blvd.  
Winnemucca, Nevada 89406

Subject: Dry Hills Fence/Pipeline - Snowstorm HMA

Dear Mr. Christensen:

As requested by Resource Concepts, the Commission would like to provide comment to the environmental assessments for proposed fencing and a pipeline in the Dry Hills Pasture of the Bullhead Allotment. These projects have potential impacts to the Snowstorm Wild Horse Herd.

It is uncertain if the proposed pipeline diverts water from inside the Herd Management Area. Better water distribution is beneficial to both cattle and wild horses, the establishment of horses beyond the delineated herd area may jeopardize these animals in future gathers.

Fences within Herd Management Area have an accumulative impact to the free-roaming nature of wild horses. Short term impacts may separate wild horses from their delineated herd management area. Increased fencing of the Bullhead Allotment has potential harm and an accumulative impact analysis is warranted.

It would appear that this small project is for a livestock holding facility providing limited benefits. We appreciate the efforts of Twin Peaks Mine to contribute to the management of our public lands.

We would appreciate attention concerning these issues.

Sincerely,

A handwritten signature in cursive script that reads "Catherine Barcomb".

CATHERINE BARCOMB  
Executive Director