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**P.O. BOX 517, GOLDFIELD, NEVADA 89013  
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U.S. Department of Energy  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
1551 Hillshire Drive, M/S 011  
Las Vegas, Nevada 89134

January 03, 2008

Attention: Ms. Jane Summerson

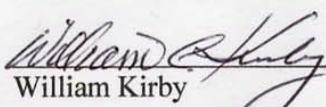
RE: Comments on the Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (SEIS) DOE/EIS-0250F-S2D and Comments on Draft Environmental Impact Statement for Rail Alignment for the Construction and the Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada, DOE/EIS-0369D (the DEIS).

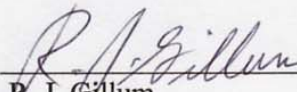
Dear Ms. Summerson,

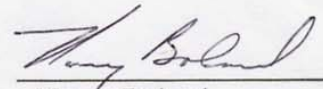
The Esmeralda County Board of County Commissioners appreciates the opportunity to provide comments on the above referenced documents. We have considered these Department of Energy documents and are providing the following comments.

Esmeralda County appreciates your consideration and looks forward to working constructively with DOE on this important national project.

Sincerely,

  
William Kirby  
Chairman

  
R. J. Gillum  
Vice Chairman

  
Nancy Boland  
Commissioner

**Esmeralda County Board of County Commissioners**  
**January 03, 2008 Comments to:**

Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (SEIS)

The Final EIS should include design for the Transportation Aging Disposal (TAD) canisters. Without the final design it is difficult to assess if the TADs will impact the repository system, including transportation components.

The Final EIS should include final costs and financial details for the TADs.

Since the TADs can only be shipped via rail or by heavy-haul trucks. The Final EIS should provide more details, plans, and costs of shipping the TADs via rail and heavy-haul trucks. Impacts of shipping the TADs need to be better defined in the final EIS.

Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada – Nevada Rail Transportation Corridor (Draft Nevada Rail Corridor SEIS) and Draft Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada (Draft Rail Alignment EIS)

When determining the Goldfield alternative segment 3 as the preferred route the Draft Nevada Rail Corridor SEIS does NOT appear to have accurate information. When comparing the Goldfield alternative segments 3 and 4 the numbers used for private parcels, mining claims, and impacts are not accurate. The final EIS needs to examine these findings further.

Since 2004 Esmeralda County residents and officials have previously submitted written comments stating very clearly that the western side of Esmeralda County (Goldfield alternative segment 4) was overwhelmingly the preferred route for a railroad passing through our county. However, the EIS gives no consideration to Esmeralda County for past comments and preferences when designating Goldfield alternative segment 3.

The final EIS should include moving the rail to the west near (Goldfield alternative segment 4) to ensure the future exploration, development and mining of the mineralized lands. Goldfield segment 4 is the closest route to Silver Peak would also be an advantage to Chemetall Foote Corp. for shipping and receiving materials for

their plant in Silver Peak. The Goldfield alternative segment 4 has a large differential financial benefit to Esmeralda County over the other three Goldfield alternatives.

The final EIS should include a through-going rail system running both north from Yucca Mountain and also south from Yucca Mountain connecting to the Union Pacific railroad line south of Las Vegas. The through-going rail system would serve to eliminate the necessity for rail shipments through the Las Vegas Valley where government leaders are concerned about the effect nuclear shipments may have on the tourism industry. In the large sense a through going railroad would link San Francisco/Oakland/Reno to Las Vegas/Los Angeles, a major addition to the flow of commerce in Central Nevada and the western seaboard.

If high-level radioactive waste is transported by truck over U.S. highway 95 in Esmeralda County it will create impacts without economic gain. The final EIS should address future Department of Energy investments in highway and infrastructure improvements.

Considering the unknown costs and impacts of the Caliente Route, the DOE needs to further examine the entire Mina Rail route including further mitigation with the Walker River Paiute Tribe and also further examine alternative routes around the Walker River Paiute Reservation.

The Commissioners are pleased to acknowledge the Department of Energy for including in the EIS the Maintenance-of-way Headquarters Facility to be located in Esmeralda County (EIS Summary S.3.2.3, Table S-6) and the ballast quarries, one to be located west of Goldfield, and two northeast of Goldfield (EIS Summary S.3.2.1 Table S-5). Esmeralda County looks forward to working constructively with DOE in assisting with the development of these facilities and activities.

The Esmeralda County Board of County Commissions respectfully submits the following additional comments and backup information in regard to the above general comments:

## **INTRODUCTION**

As an Affected Unit of Local Government (AULG), Esmeralda County, Nevada, is participating in the NEPA/EIS process to license and operate the Yucca Mountain geologic repository for high-level nuclear waste. Of particular concern to Esmeralda County is the alignment of the proposed rail corridor over which much of this nuclear material will be transported in Esmeralda County. Esmeralda County supports the Goldfield 4 (GF4) Alternative identified in the Draft Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nevada (DOE, 2007). The Goldfield 3

(GF3) Alternative in rough terrain through the hills to the east of Goldfield was selected in the Draft EIS (DOE, 2007, page S-65).

In the Summary of the Draft EIS (DOE, 2007, page S-66), Table S-7 presents the Analysis Factors influencing the selection of various rail route alternatives. The factors influencing the selection of GF3 were presented as:

- Engineering uncertainty of crossing mining district associated with Goldfield 1.
- Goldfield 4 would include two grade-separated crossings of U.S. Highway 95.
- Goldfield 4 would have greater cultural resources impacts than Goldfield 1 or Goldfield 3. Goldfield 4 would enter the Goldfield Historic District.
- Goldfield 3 would have fewer land-use conflicts than Goldfield 1 or Goldfield 4.

## **POTENTIAL IMPACTS TO CULTURAL RESOURCES**

The EIS fails to fully recognize the destructive impacts associated with GF3 to Willow Springs and related artifacts of cultural significance to Native Americans. Furthermore, the EIS mistakenly characterizes the potential impacts from GF4 to the Goldfield Historic District. Specifically, the EIS states in bullet 3 above “Goldfield 4 would enter the Goldfield Historic District” which is absolutely wrong.

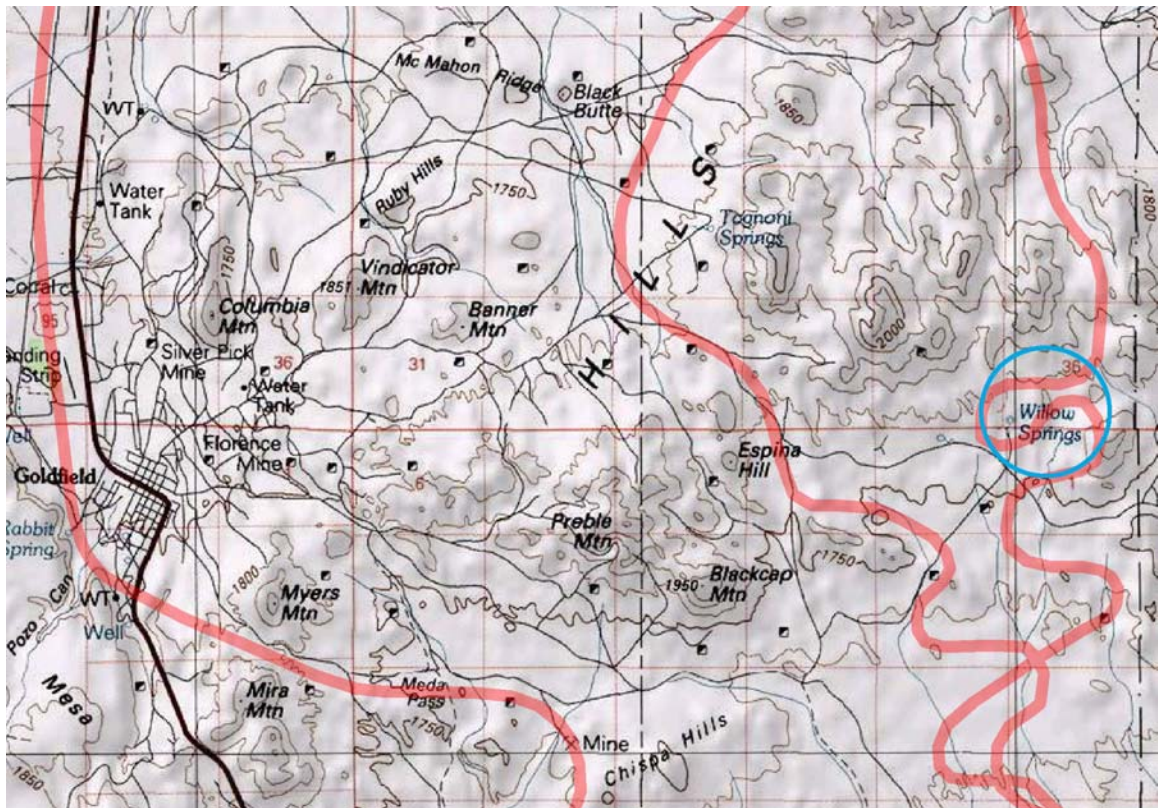
What this table does not recognize is the likelihood of Cultural Resource impact to Willow Springs and historic Native American Sites that Goldfield 3 would cause. Esmeralda County asserts that the GF4 alternative allows more flexibility in the final route alignment to avoid negative cultural impacts.

The EIS recognizes the existence of a known site within the GF3 alignment (DOE, 2007. Vol. II, page 3-326). Specifically, the “probable site of a Western Shoshone village named Matsum” is identified near Willow Springs. Section 3.2.13.4.3 of the EIS recognizes the value of feelings associated traditional sites and landmarks, but there is no accepted methodology to place value on those feelings. It seems reasonable to assume the cut and fill activities required for the tortured rail alignment through the adjacent hills would alter the area beyond recognition, in addition to what might be unearthed.

Numerous springs are identified in the area, and artifacts in the vicinity of these springs in an historic arid environment are almost guaranteed. Any modification to the alignment in this location would not be cheap or easy within topological constraints.

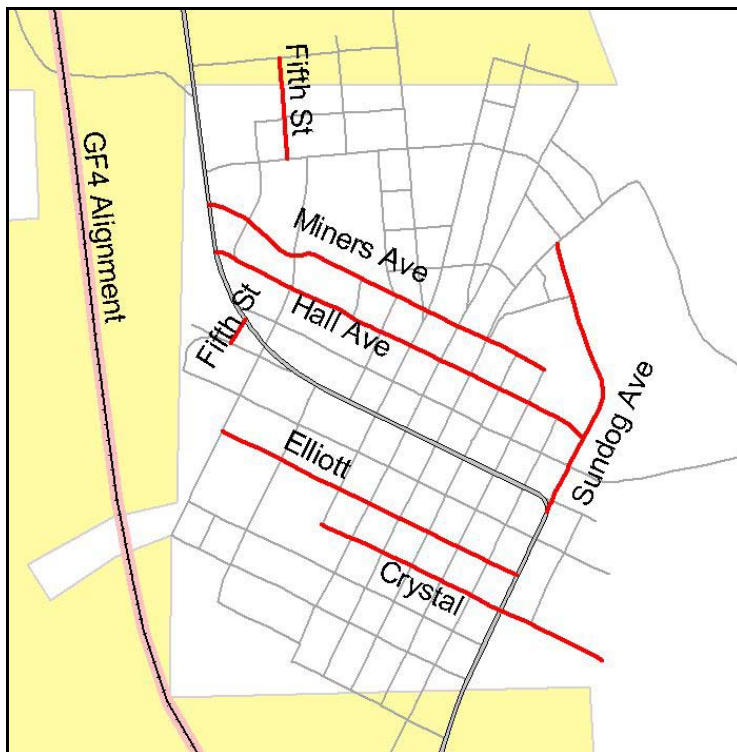
The switchbacks evident in the route alignment of GF3 (see Figure 1) suggest engineering considerations in the vicinity of Willow Springs already require a less than optimal path, and alternatives for route modification in the area will be few. The alignment adjacent to Goldfield is in a corridor formerly utilized by a railroad, and includes recent utility construction under the oversight and approval of SHPO. Local cooperation with County officials and private interests should provide some flexibility of final alignment without expensive mitigation.

**Figure 1. Goldfield and Willow Springs Topographical Map**



The Alternative Route (GF4) skirts the edge of the Goldfield Historic District (GHD), but doesn't actually penetrate or traverse the protected location (see Figure 2). NOTE: The streets bounding the Historic District are depicted in red; private lands are white and BLM lands in yellow (see Appendix A for the National Registry of Historic Places for the description of the Goldfield Historic District).

**Figure 2: General Bounding Streets of Goldfield Historic District**

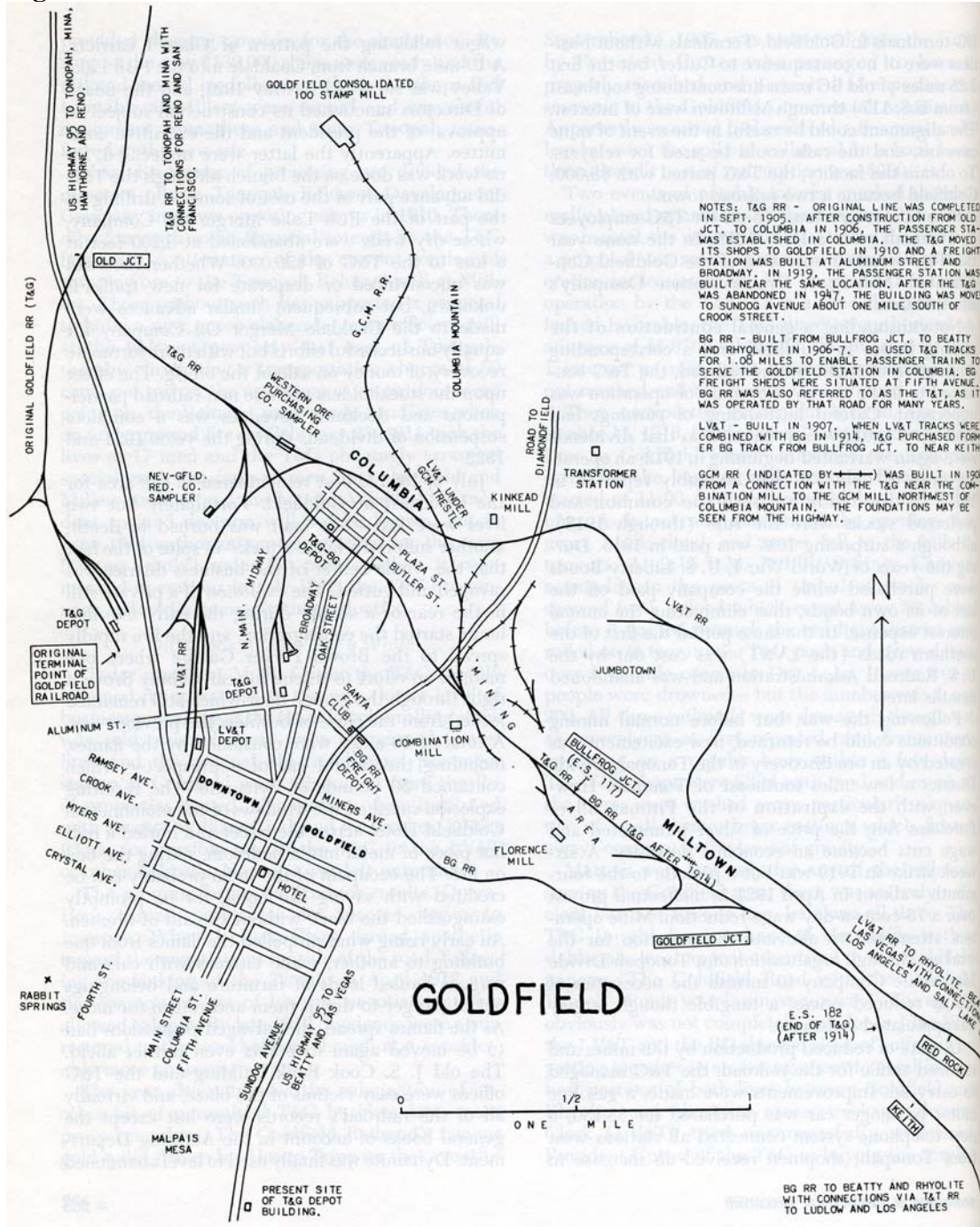


The recent experience of the Esmeralda County sewer renovation and SHPO approval demonstrates the feasibility of GF4. Recent construction in areas adjacent to GHD were conducted under the supervision of a recognized CR specialist, used accepted protocols, and yielded no mitigating circumstances from sewer, water, and power projects (See Appendix B).

The Nevada State Historic Archives contain few maps associated with Goldfield, but holds numerous documents and several newspaper microfilm archives of what was once the most bustling city in the state. Specific locations, such as rail terminals and surrounding activities, are available in such documents as the historic rail infrastructure map shown in Figure 3 (Myrick, 1962). Other local sources such as the highway department and Esmeralda County Public Works can provide additional information for avoidance of impacts rather than mitigation.

Any construction activities on either route would be subject to appropriate protocols and oversight by the State Historic Preservation Office (SHPO). However, the Esmeralda County position is that the rough terrain in the vicinity of Willow Springs and the potential archeological sites would provide little opportunity for route realignment or mitigation on the GF3 route.

**Figure 3. Goldfield Historic Rail Infrastructure**



Source: Railroads of Nevada and Eastern California. David F. Myrick.

## POTENTIAL IMPACTS TO MINING CLAIMS

### INTRODUCTION

Mining ground is subject to the principles found in the Mining Law of 1872. The five basic elements related to mineral claims include discovery of a valuable mineral, location of mining claims, recordation of claims, maintenance or performance of annual requirements on claims, and patenting of the mineral or surface estate to the claimant. Unpatented claims allow the claimant to extract minerals but not hold title to the land. Following the patent process, the claimant owns title to the land in addition to the right to extract the mineral.

The Draft EIS uses an estimate of potential impacts to mining properties drawn from a mineral assessment prepared by a DOE sub-contractor (Shannon and Wilson, 2005). Specifically, the Draft EIS reports the following tabulation of potentially impacted properties.

	Goldfield 3	Goldfield 4
EIS section estimate	14	19
EIS claim estimate	359	538

The methodology used in the Shannon and Wilson report selected all Public Land Survey Sections (PLSS) intersected by the various rail alignments. The Bureau of Land Management (BLM) Lands Records database includes an on-line active mining claims report capability that queries mineral location claims by Township, Range, and Section (BLM, 2007). The digital reports include claim location, name, serial number, owner, status, location date, and date of last assessment.

In their 2005 report, Shannon and Wilson clearly state their methodology is based on a claim records search by section. However, the Draft EIS misstates the potential impact to mining claims in its tabular presentation. The Shannon and Wilson report estimates mining claim records by section, while the EIS reports this estimate as the number of claims potentially impacted. The EIS reference to the number of claims is not accurate.

There are two systematic errors that contribute to an over-estimation of impacts to unpatented mining claims. Where a claim spans multiple sections, a record is entered for the claim in each section. Additionally, if there is more than one claimant, a record is entered for each owner. If a claim intersects more than one section and/or has more than one owner, many multiple records of the same claim are returned in the geo-section search query.

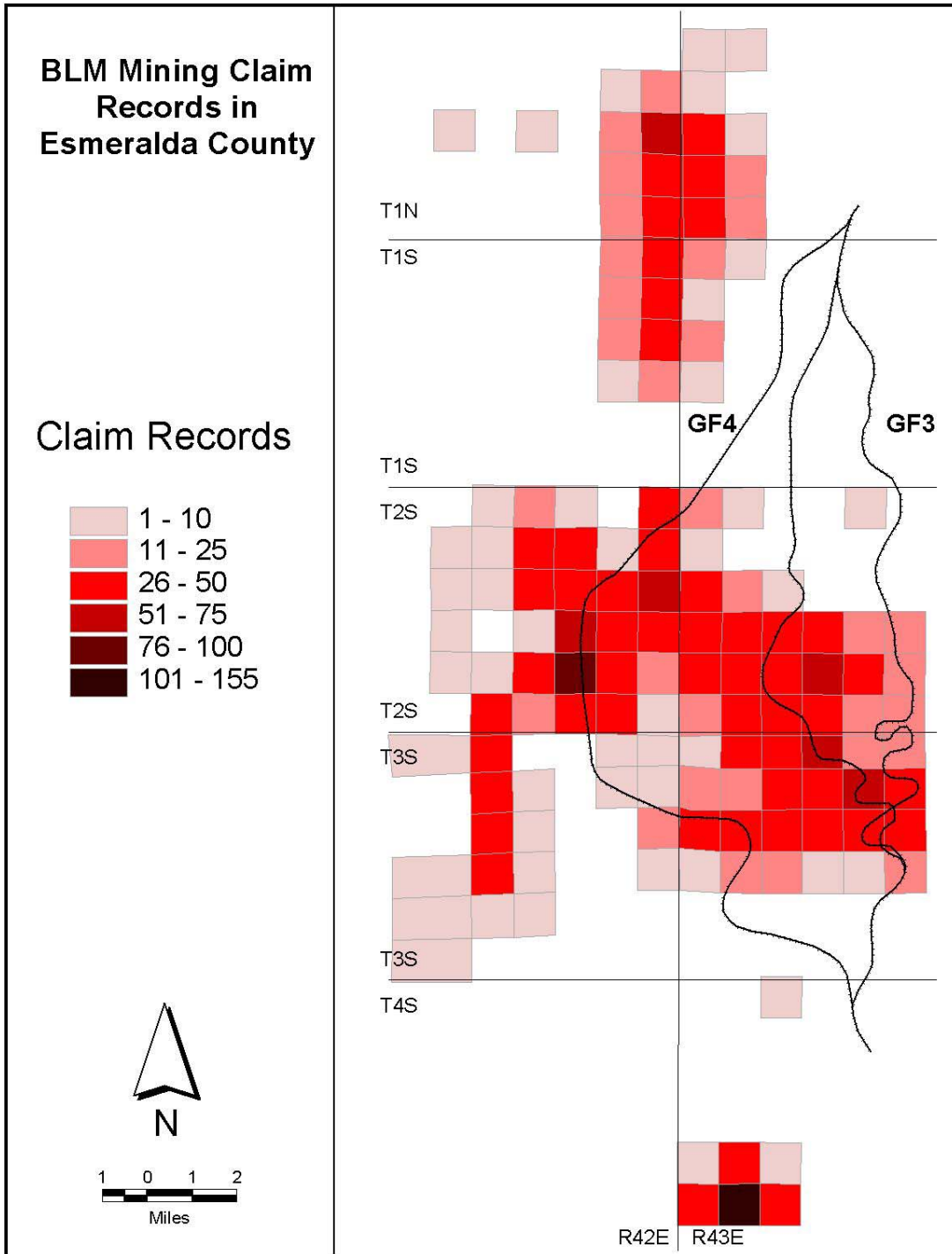
The comparative results in the following presentation suggest both systematic errors were included in the tabular impacts in the Draft EIS. Using a similar methodology of

claim record density, results are presented for all active mining claims in Townships 1N, 1S, 2S, 3S, 4S, 5S, and Ranges 42E and 43E, database queried on December 12, 2007 (BLM, 2007).

Figure 4 shows the map of mining claim records by section in the vicinity of Goldfield. The cluster of sections to the north represents claims in the Klondyke Mining District, while claims to the south are from the Stonewall Mining District. GF4 skirts the western portion of the historic Goldfield Mining District while GF3 penetrates the eastern portions of the Goldfield Mining District.

The highest density of claims in the area is in Section 27 of Township 2 South, Range 42 East. This is the center of the “Gemfield” deposit described in the following section. It should be noted that US Highway 95 traverses this section in close proximity to the east of the proposed GF4 rail alignment.

Figure 4. Mining Claim Records by Section, Goldfield Vicinity: December, 2007



All the Active Mining Claim Records by section are selected for those sections intersected by the alternative rail corridors for GF3 and GF4. Multiple records are eliminated for all but a single record for each claim serial number. While spatial fidelity is lost for the sections involved, this procedure retains the actual number of claims in the sections intersected by the rail corridors.

Based on our analysis of records extracted from the BLM Land Records System on December 20, 2007 (BLM, 2007), our findings indicate the mining claim density reported by Shannon and Wilson by section for GF3 is accurate. However, our analysis shows the number of mining claim records for GF4 is substantially less than was shown in the 2005 analysis conducted by Shannon and Wilson.

In their 2005 study, Shannon and Wilson reported 14 sections intersected by the GF3 route with 359 claim records. This investigation shows 14 sections with 357 records for GF3. In the 2005 study, the GF4 route intersected 19 sections with 538 claim records. However, the current investigation shows only 17 sections with 490 claims. The current investigation also eliminates duplicate claim records and shows a potential impact of 205 claims by GF3 and 334 claims by GF4 (see Table 1).

**Table 1. Mining Claim Estimates (Dec 20, 2007)**

	Goldfield 3	Goldfield 4
EIS section estimate	14	19
Our section estimate	14	17
EIS claim estimate	359	538
Our Claim estimate	357	490
Multiple records reduction	-152	-156
Claims	205	334

It is noteworthy that there is a substantial reduction in the number of claims and records along the Goldfield 4 Alignment. Specifically, 48 claims on GF4 lapsed, or were closed, and only 2 claims on GF3 lapsed since the 2005 Shannon and Wilson Report.

In conclusion, it is clear the unpatented mining claims along GF4 do not present a significant impact to construction of a rail line along this route. The Draft EIS clearly overstated the impacts to active mining activity along this route.

## **METALLIC VENTURES GOLDFIELD, INC.**

In the BLM records search, one claimant figures prominently in the Goldfield vicinity. Metallic Goldfield Ventures (MVG) is the largest claimholder on both GF3 and GF4. All but 12 of the 205 claims recorded in the sections crossed by GF3 are held by MVG, and 190 of the 334 claims crossed by GF4 are held by MVG. From their website (MVG, 2007) and other Internet sources, it is possible to assess their local activities.

The Metallic position in the Goldfield area consists of 32 square miles of wholly owned or controlled mining properties. These properties include patented and unpatented claims and holdings. MVG acknowledges the company does not control all land within the exterior boundary of local holdings, but within the Goldfield District MVG controls 20,600 acres. Previous efforts to study the complex mineralogy of the district were stymied by fractured ownership of mineralized properties and poor accessibility to exposed ore bodies and drill-log records. Consolidation of holdings under MVG enables more careful evaluation of controlling geologic structures and deposition of mineral.

MVG's official filings report three distinct deposits of gold mineralization in their holdings near Goldfield. These areas are known as Gemfield, McMahon Ridge, and Goldfield Main. Of particular interest to these comments are characteristics of the Gemfield deposit, located approximately two miles north of Goldfield within the GF4 alignment. However, the flat terrain across the valley floor in this portion of the GF4 alignment provides flexibility for route modification.

MVG also controls most of the mining claims crossed by GF3. The difference in terrain between GF3 and GF4 is striking. The GF3 alignment is through difficult terrain with little option for route modification if constraints are encountered during design or construction. However, the flat terrain across the valley floor provides flexibility to adjust the route alignment during design and construction. The Esmeralda County support for GF4 includes an expectation that archeological resources will constrain the construction and operation of the GF3 alignment, and the potential to make route adjustments on the valley floor clearly show the GF4 alignment a better alternative for both DOE and the local community.

New materials documenting the location of the Gemfield ore deposit and plans for development have become available since the EIS analysis. This information is particularly important regarding the proposed plan for mine development. A preliminary assessment of the current exploration program on the Gemfield property has determined mine development should proceed (AMEC, 2006).

Details regarding the proposed open pit on the property, and the intent of the owner to relocate US Highway 95 to the west, clarify the mineral position on the GF4 rail route alternative and provide an opportunity to avoid the active mining (see Figures 5 and 6). The GF4 alternative can avoid active mining and still take advantage of the opportunity to utilize the route advantages.

AMEC E&C Services Inc. produced the technical report for MVG evaluating the Gemfield property, and the procedures undertaken to characterize and identify the deposit. Regarding the location of the deposit and configuration of the resultant open pit, several diagrams and design descriptions are particularly important regarding rail route alternatives. First, the Gemfield deposit underlies the current location of US Highway 95 approximately 2 miles north of Goldfield (AMEC, page 18-2). The AMEC Report provides the following description regarding the pit:

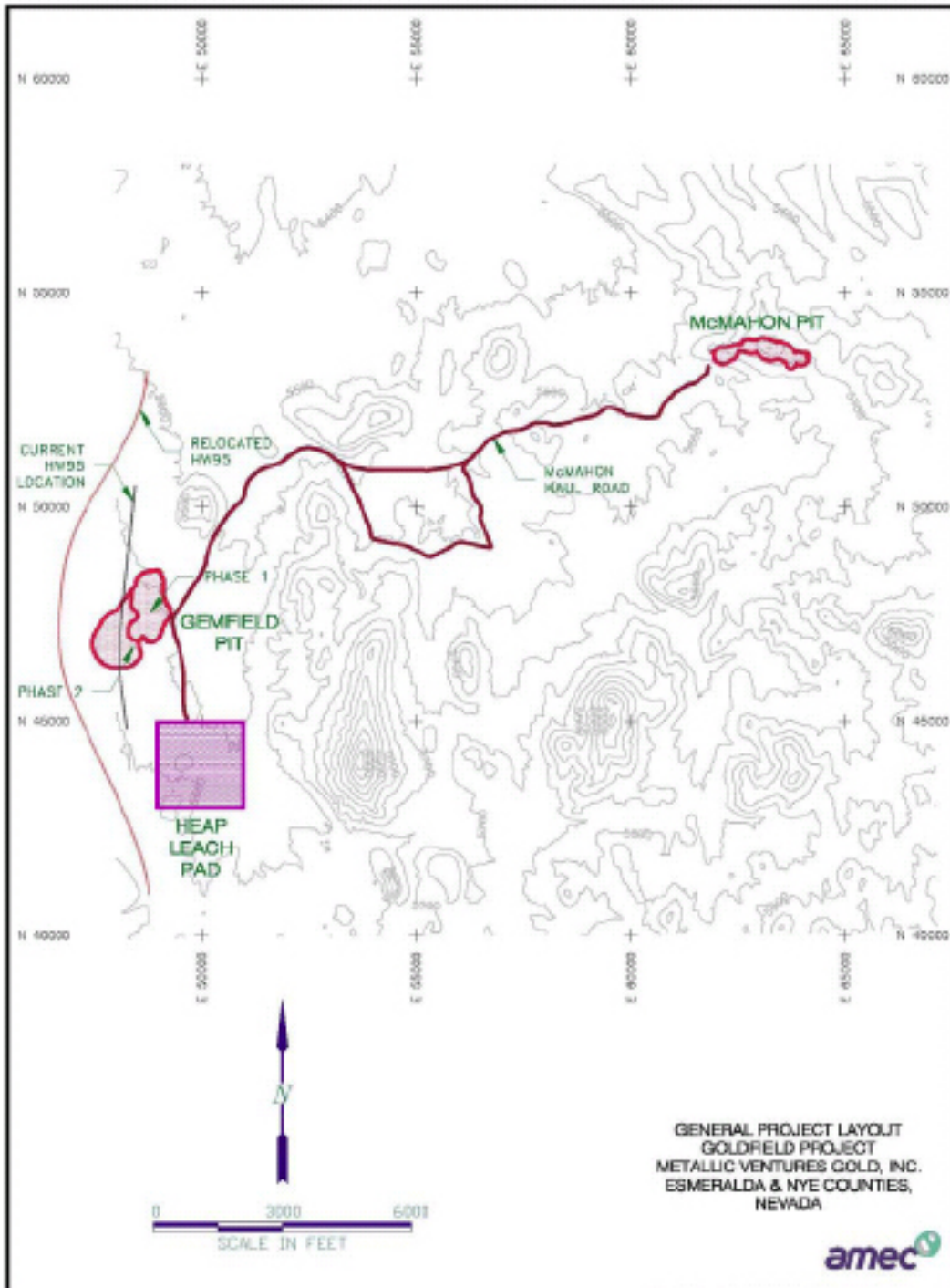
State Highway 95 runs north–south across the west portion of the Gemfield deposit and will have to be relocated to allow open pit mining of the deposit. It is proposed that initial mining of the Gemfield deposit will be east of the highway, allowing time for the relocation to be completed before expansion into the final pit (Figure 18-1). Optimized pits were therefore generated for two cases – one with the highway in place, and a second with the highway relocated to the west, a deviation of some 2 miles (3.2 km). An offset of 46 m (150 ft) from the highway was used as the western limit for the first case, based on the preliminary geotechnical report prepared by Call & Nicholas.

Clearly, the mineral resource location is well enough established to determine where the highway relocation would be necessary to accommodate the mineral extraction. With that information available, the uncertainty regarding mining impacts is resolved for the GF4 route alternative. The rail alignment could be shifted to the immediate west of the relocated US Highway 95 and avoid disruptions to active mining.

In conclusion, the above referenced information, which was unavailable when the Shannon and Wilson report was prepared, provides a powerful and compelling reason to re-examine the selection of GF3 rather than GF4.

Figure 5: AMEC Report Site Plan (page 18-3)

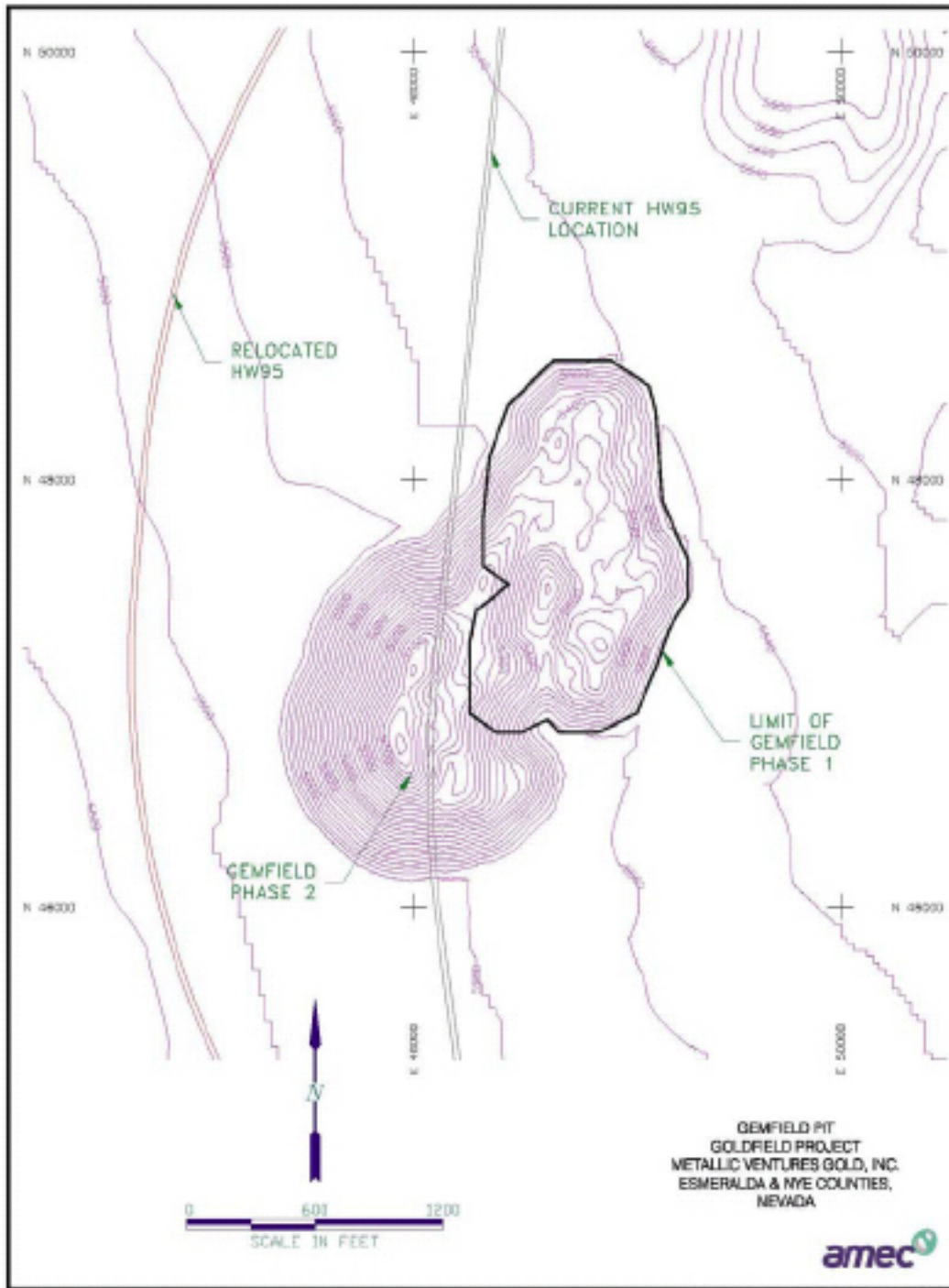
Figure 18-1: General Goldfield Site Plan



AMEC DRAWING NO. MFG Mining Layout Figures.dwg

Figure 6: AMEC Report Pit Location (page 18-4)

Figure 18-2: Gemfield Optimized Pit



## **SOCIAL AND ECONOMIC CONSIDERATIONS**

The Esmeralda County position in favor of GF4 derives, in part, from the “Shared Use” concept in the operation of the proposed rail line. Enhanced transportation linkages for local economic development are desperately needed in this impoverished county with few economic development options. The history of resource exploitation in the area by absentee landlords left limited infrastructure improvements, and few opportunities for the local economy to shift from resource extraction to other economic activities. Renewed rail transportation development and a lowering of transportation costs may provide opportunities for new ventures, and may enhance the viability of existing mining enterprises.

Over the past century, development in this arid region rich in natural resources enriched the national economy and absentee owners. Rail linkages early in the twentieth century enabled economic extraction of precious and industrial minerals. Urban development grew in strategic locations at transportation junctions, but the local economy specialized in mining without diversification to other components of the economy. When market conditions changed and the rails were abandoned, the sparse populations drifted off to other locations. A re-establishment of rail service through the shared use concept is an opportunity to stimulate broader economic development desperately needed in the County and surrounding region.

Several considerations should be monitored carefully over the next few years, as plans are refined for the repository and rail alignment. Economic conditions are largely a function of the cost of power (fossil fuels and alternatives), transportation costs and proximity to markets, broader market conditions, and cost and availability of capital. Recent increases to the cost of power, and international competition involving innovation and labor, may radically alter economic and market conditions in the near future.

The energy potential remaining in the used nuclear fuel may well become an important resource in the near future. A regional reprocessing facility involving advanced technology could form the core industry for new development with important spillover potential. Goldfield could provide numerous advantages to attract components of such development.

Any community or location capable of producing and exporting energy in the next decade is a likely candidate to emerge as an economic growth pole of the twenty-first century economy. In addition to the potential for nuclear fuel reprocessing, geothermal, wind, and solar energy potential are being seriously examined. A new transportation corridor could accommodate the co-location of transmission lines to distant energy markets.

This historic nature of this community should be recognized as a valuable asset, and conservation efforts should be directed to stabilizing and restoring the few, magnificent examples of previous splendor that remain. Fire, flood, and neglect swept away most of the previous built environment. The core of what remains is a potential treasure at the center of what is possible for the reinvigorated Goldfield of the next century. Revenues to Esmeralda County generated by virtue of the rail line would enable the rejuvenation of this historic community. As a tour destination for the nearby Las Vegas market, expanding tourism potential could be an important component of diversified economic development.

Additionally, abundant groundwater resources are present in most aquifers in this portion of the basin and range province. Plentiful water provides another incentive for potential new business in the region. Aquaculture and hydroponics vegetable production has been shown economically feasible in Arizona where abundant sunshine and adequate water is available. Proximity to Las Vegas and distant markets through improved transportation linkages could provide opportunity for similar enterprises in Esmeralda County.

Rural locations throughout the West are often anchored and sustained by the road maintenance crews that keep the public thoroughfares operational. The DOE proposal to include a maintenance-of-way facility in Esmeralda County is a welcome addition of stable jobs to the local economy. An industrial siding adjacent to land with development potential could be very attractive to certain entrepreneurs in the new economy.

In conclusion, we respectfully urge the Department of Energy to respond to these comments and modify the draft EIS in it's final version and Record of Decision. Specifically, we ask that the Final EIS adopt the Goldfield Alternative 4 as the Preferred Option for the alignment for transportation by rail to Yucca Mountain.

## REFERENCES:

AMEC 25, September 2006. Preliminary Assessment, Gemfield and McMahon Ridge Deposits: Goldfield District, Nevada.

[http://www.metallicventuresgold.com/i/pdf/Goldfield Preliminary Assessment 0925 2006.pdf](http://www.metallicventuresgold.com/i/pdf/Goldfield_Preliminary_Assessment_0925_2006.pdf)

BLM 2007. Bureau of Land Management Land and Mineral Records-LR2000 system, Mining Claims Geo Report. Accessed on-line 12-20-2007.

<http://www.blm.gov/landandresourcesreports/rptapp/menu.cfm?appCd=2>

DOE (U.S. Department of Energy) 2007. Draft Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nevada. DOE/EIS-0369D. Las Vegas, Nevada: U.S. Department of Energy, Office of Civilian Radioactive Waste Management.

Myrick, David F. 1962. Railroads of Nevada and Eastern California. San Diego, California: Howell-North Books.

MGV (Metallic Goldfield Ventures) 2007. Goldfield Project Resources.

<http://www.metallicventuresgold.com/s/Advanced-Goldfield.asp>

Shannon & Wilson 2005. Mineral and Energy Resource Assessment Report, Task 3.4: Preliminary Mineral and Energy Resource Assessment Report (Submittal No. 7.8), Rev. 0. Subcontract No. NNHC4-00197. Seattle, Washington: Shannon & Wilson. ACC: ENG.20060323.0013.



NOTE: Detailed supporting research documentation substantiating these comments will be made available upon request. Requests for this information should be made to:

Esmeralda County Oversight Program  
P.O. Box 490  
Goldfield, Nevada 89013  
775-485-3419

**APPENDIX A: NATIONAL REGISTRY OF HISTORIC PLACES DESCRIPTION OF THE GOLDFIELD HISTORIC DISTRICT**

Nevada Entries in the National Register of Historic Places - Esmeralda County Page 1 of 1


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 **Department of Cultural Affairs**   
**State Historic Preservation Office**  
Nevada Entries in the National Register of Historic Places

**Esmeralda County**

Name/Address	Type of Entry	Date Entered
*Goldfield Historic District Roughly bounded by Fifth Street, Miner, Sundog, Crystal and Elliott Avenues	District	06/14/82

**Note:**  
\* HISTORIC DISTRICT: For individual listing please contact the State Historic Preservation Office.  
\*\* NATIONAL HISTORIC LANDMARK

 **State of Nevada** [Go back a page](#)  
**Department of Cultural Affairs**

Modified: 9/5/2002  
Location: <http://dmla.clan.lib.nv.us/DOCS/shpo/entries/esmeralda.htm>

<http://dmla.clan.lib.nv.us/DOCS/shpo/entries/esmeralda.htm> 1/9/2008

**APPENDIX B:**  
**SEWER CONSTRUCTION COMPLIANCE**

FINDING OF NO SIGNIFICANT IMPACT  
FOR  
SEWER COLLECTION REHABILITATION PROJECT  
GOLDFIELD, NEVADA

I have reviewed the attached Environmental Assessment (EA) that has been prepared for upgrading and replacement of the existing Goldfield sewer collection system. The proposed improvements to the collection system include installation of approximately 55,000 linear feet of 8" or larger gravity sewer main and appurtenances. The proposed project will bring the existing sewage disposal and transport system up to current code. Construction will be confined within the Town of Goldfield proper. All of the new sewer mains will be installed in existing streets. Some of the new mains will replace existing sewer mains, and the remaining new sewer mains will be installed below existing town streets generally containing other utilities, but not sewer lines. The recommended alternative is to retrofit the existing sewer system main with new larger diameter pipe. This option was recommended due to the ease of operation, size of existing disturbed area, and minimal capital and operational costs. It provides the required National Environmental Policy Act (NEPA) documentation for this action. A review of the Environmental Assessment and coordination with appropriate agencies indicates that the proposed upgrade will not have a significant impact on the quality of the physical, cultural or the biological environment.

This project has already undergone NEPA compliance by the US Department of Agriculture, Rural Utilities Service, and by the US Department of Housing and Urban Development in 2004. The project has not changed since these documents were prepared, and the Corps of Engineers adopts these documents under the Council on Environmental Quality guidelines 40 CFR Part 1506.3.

I have considered the available information in the Environmental Assessment and it is my determination that there will not be significant impacts to the quality of the human environment resulting from the proposed action. The preparation of an Environmental Impact Statement is not required.

7-28-06  
Date



Alex C. Dornstauder  
Colonel, US Army  
District Engineer

ENVIRONMENTAL ASSESSMENT  
FOR  
Sewer Collection Rehabilitation Project  
Goldfield, Nevada

PREPARED BY  
U.S. Army Corps of Engineers  
Los Angeles District  
Environmental Resources Branch  
July 2006

## EXECUTIVE SUMMARY

This document consists of an Environmental Assessment (EA) for the upgrading of the sewer collection system located in Goldfield, Nevada. The proposed project includes improvements to the existing sewer collection system. The proposed Improvements to the collection system include installation of approximately 55,000 linear feet of 8" or larger gravity sewer main and appurtenances. These new mains are located in the Town of Goldfield proper. All of the new sewer mains will be installed in existing streets. Some of the new mains will replace existing sewer mains, and the remaining new sewer mains will be installed below existing town streets generally containing other utilities, but not sewer lines. These improvements will bring the existing sewer collection system up to current code. This option was recommended due to the ease of operation, size of existing disturbed area, and minimal capital and operational costs.

This project has already undergone NEPA compliance by the US Department of Agriculture, Rural Utilities Service, and by the US Department of Housing and Urban Development in 2004. The project has not changed since these documents were prepared, and the Corps of Engineers adopts these documents under the Council on Environmental Quality guidelines 40 CFR Part 1506.3.

This Environmental Assessment has been prepared to determine and assess the impacts associated with the upgrading of the Goldfield, Nevada sewer collection system and the alternatives available.



KENNY C. GUINN  
Governor

SCOTT K. SISCO  
Interim Director

STATE OF NEVADA  
DEPARTMENT OF CULTURAL AFFAIRS  
Nevada State Historic Preservation Office  
100 N. Stewart Street  
Carson City, Nevada 89701

520

COP

RONALD M. JAMES  
State Historic Preservation C

February 10, 2003

Susan Dudley  
Grant Administrator  
P. O. Box 3056  
Tonopah, NV 89049

Re: Proposed Goldfield Sewer Improvement - Esmeralda County using CDBG Funds.

Dear Ms. Dudley:

Thank you for submitting the requested information. The Nevada State Historic Preservation Office (SHPO) has reviewed the subject undertaking for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. Based on the information provided in correspondence dated January 21, 2003 (received January 24, 2003), the project consists of the following:

- Installation of sewer lines within existing street right-of-ways as depicted in the Lumos and Associates January 1999 drawings submitted with the above correspondence.

Per the drawings, part of the project is within the Goldfield Historic District which was listed on the National Register of Historic Places (NR) in 1982 and covers the town's central core. The remaining areas within Goldfield yet outside the historic district boundaries have not been surveyed for historic resources. Therefore, for the purposes of Section 106 review, our office recommends an Area of Potential Effect (APE) to include all of Goldfield and that the town be treated as potentially eligible to the NR.

If this project is funded and proceeds as discussed in the above correspondence, the SHPO would concur with a determination of 'No Adverse Effect' for the subject undertaking. However, due to the potential of finding archeological remains in the project area(s), the SHPO highly recommends having an archeologist occasionally monitor construction of the sewer lines and suggests contacting the Bureau of Land Management or the U.S. Forest Service offices in Tonopah for assistance.

Please be advised that if buried or previously unidentified resources are located at the proposed site during project activities, the SHPO recommends that all work in the vicinity of the find cease and this office be contacted for additional consultation.

If you have any questions regarding this correspondence, please contact Rebecca R. Ossa, Architectural Historian at 775-684-3441 or via email at: [rossa@clan.lib.nv.us](mailto:rossa@clan.lib.nv.us).

Sincerely,

Alice M. Baldrice, Deputy  
State Historic Preservation Officer