

Las Vegas Office:
2300 East St. Louis Ave.
Las Vegas, NV 89104-4211
(702) 668-4590
Fax (702) 668-4567



Elko Office:
4780 East Idaho Street
Elko, NV 89801-4672
(775) 753-1360
Fax (775) 738-2639

DEPARTMENT OF AGRICULTURE

405 South 21st Street
Sparks, Nevada 89431-5557
Telephone (775) 353-3601 Fax (775) 353-3661
Website: <http://www.agri.nv.gov>

April 8, 2026

Surface Transportation Board (Docket No. FD 36889)
395 E Street SW
Washington, DC 20423

To Whom It May Concern:

The Nevada Department of Agriculture (NDA) appreciates the opportunity to provide preliminary comments for the Surface Transportation Board's (STB) Office of Environmental Analysis (OEA) as it prepares the environmental analysis and review for the proposed Nevada Gold Mines (NGM) Nevada Gold Rail LLC rail line (NGM Rail), Docket No. FD 36889.

The NDA respectfully submits these comments in accordance with its mission to preserve, protect, and promote Nevada agriculture. While the department understands that the Commission's decision will consider both economic need and environmental effects, these comments focus on environmental impacts relevant to agriculture and natural resource health.

After reviewing the potential route alternatives, the department's preliminary position is that NGM's proposed and preferred alignment appears to have the least resource impact. The NDA encourages the STB, Bureau of Land Management (BLM), and NGM to work collaboratively with partners to permit and develop the rail line in a manner that maximizes benefits to natural resources while mitigating all potential adverse impacts. These impacts include those related to ranching, wildlife, public health and safety, and public access.

Cooperating Agency Status

The NDA requests the opportunity to participate as a cooperating agency. The department has regulatory authority and specialized expertise across multiple disciplines, including rangeland resources, noxious weeds and restoration, and socioeconomic analyses related to the agricultural sector. In accordance with its statutory mission, the NDA engages as a cooperating agency on projects that directly affect resources under its regulatory purview, and approaches these responsibilities with full commitment, active participation, and the application of relevant expertise.

Noxious Weeds and Weed Management

For noxious weed considerations, the NDA requests that weed analysis, treatment planning, and weed management activities be coordinated with the County and the Diamond Valley Weed Control District. These

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(702) 668-4590
Fax (702) 668-4567

Elko Office:
4780 E. Idaho Street
Elko, NV 89801-4672
(775) 738-8076
Fax (775) 738-2639

entities share statutory and regulatory responsibilities for weed control under Chapter 555 of the Nevada Revised Statutes and Chapter 555 of the Nevada Administrative Code. The department also requests the creation of a project-specific Noxious and Invasive Weed Control Plan that includes monitoring, surveys, treatment, reseeding, best management practices, and an Early Detection Rapid Response (EDRR) plan.

Revegetation and Restoration

When developing revegetation plans and seed mixes, the NDA recommends using Ecological Site Descriptions (ESDs) and their associated State and Transition Models (STMs). These tools help ensure revegetation efforts are appropriate for site conditions and set up for long-term success, reducing the need for retreatment. This approach supports maintaining productive vegetation for both livestock grazing and wildlife habitat.

Socioeconomic Analysis

The department found the socioeconomic analysis incomplete, particularly regarding impacts to existing land uses on affected public land grazing allotments.

The NDA frequently observes analyses where forage loss—described as Animal Unit Month (AUM) reductions—is presented only as a percentage of total permitted AUMs, without adequate socioeconomic contextualization. The environmental review should include cross-cutting analyses quantifying the economic impacts of AUM reductions, even when temporary.

Mitigation measures should be clearly identified in the socioeconomic section to address these losses. Even small reductions in AUMs can result in significant long-term economic losses, reduce socioeconomic stability, and erode the cultural heritage long associated with ranching, particularly in rural and frontier communities.

Forage Loss Quantification

Grazing impacts must be quantified based on actual forage loss rather than average AUMs per acre. Analyses should reflect physical constraints, such as limited forage availability, distance to water, accessibility, and the presence of invasive species like cheatgrass. Reductions should not be assumed in areas where grazing is already limited by these factors.

Livestock Safety and Rail Operations

Furthermore, potential noise and disturbance impacts to livestock must be disclosed and mitigated. The NDA is also concerned about the high potential for livestock fatalities due to train collisions. The project must include a clear compensation process for ranchers and incorporate mitigation measures to reduce collision risks.

Thank you for the opportunity to comment on this important project. The NDA looks forward to continued collaboration to ensure Nevada's agricultural resources are effectively protected throughout the planning, construction, and restoration phases of the Nevada Gold Rail project.

Sincerely,


J.J. Goicoechea (Apr 13, 2026 08:37:49 PDT)

J.J. Goicoechea, DVM
Director