U.S. Department of the Interior
Bureau of Land Management

Environmental Impact Statement NV063-EIS07-019

DATE: October 2012

MOUNT HOPE PROJECT
FINAL
ENVIRONMENTAL IMPACT STATEMENT
VOLUME III of III

File Number: NVN-082096
File Number: NVN-084632
File Number: NVN-091272

Cooperating Agencies:
Eureka County
National Park Service
Nevada Department of Wildlife

Mount Lewis Field Office
50 Bastian Road
Battle Mountain, NV 89820
Phone: 775-635-4000
Fax: 775-635-4034

BUREAU OF LAND MANAGEMENT MISSION STATEMENT

The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

BLM/NV/BM/ES/11-25+1793

MOUNT HOPE PROJECT
FINAL ENVIRONMENTAL IMPACT STATEMENT

TABLE OF CONTENTS

VOLUME I of III

ACRONYMS AND ABBREVIATIONS xix

EXECUTIVE SUMMARY ES-1
Purpose of this Document ES-1
Proposed Action ES-1
No Action Alternative ES-2
Partial Backfill Alternative ES-3
Off-Site Transfer of Ore Concentrate for Processing Alternative ES-3
The Slower, Longer Project Alternative ES-4
Alternatives Considered and Eliminated From Detailed Consideration ES-5
Important Issues and Impact Conclusions ES-10
Bureau of Land Management Preferred Alternative ES-10

1 INTRODUCTION: PURPOSE OF AND NEED FOR ACTION 1-1
1.1 Introduction and Location 1-1
1.2 Project Background and History of Mining 1-2
1.3 Existing Activities and Facilities 1-7
1.4 Purpose of and Need for the Action 1-8
1.5 BLM Responsibilities and Relationship to Planning 1-8
1.5.1 Resource Management Plan 1-9
1.5.2 Surface Management Authorizations and Relevant Plans 1-9
1.5.3 Site Reclamation Requirements 1-10
1.5.4 Local Land Use Planning and Policy 1-10
1.6 Authorizing Actions 1-11
1.7 Environmental Review Process 1-14

2 DESCRIPTION OF ALTERNATIVES, INCLUDING THE PROPOSED ACTION 2-1
2.1 Proposed Action 2-1
2.1.1 Open Pit Mining Methods 2-4
2.1.2 Ground Water Management and Water Supply 2-17
2.1.3 Waste Rock Disposal Facilities 2-23
2.1.4 Low-Grade Ore Stockpile 2-37
2.1.5 Ore Processing Facilities 2-38
2.1.6 Tailings Storage Facilities 2-43
2.1.7 Project Infrastructure 2-55
2.1.8 Haul and Access Roads 2-60
2.1.9 Access and Transportation 2-61
2.1.10 Safety and Fire Protection 2-64
2.1.11 Chemical Use and Management 2-65
2.1.12 Exploration 2-69
2.1.13 Work Force 2-69
2.1.14 Applicant Committed Practices 2-70
2.1.15 Monitoring 2-76
2.1.16 Reclamation and Closure 2-77

2.2 Alternatives to the Proposed Action 2-97
2.2.1 No Action Alternative 2-98
2.2.2 Partial Backfill Alternative 2-98
2.2.3 Off-Site Transfer of Ore Concentrate for Processing Alternative ... 2-101
2.2.4 Slower, Longer Project Alternative 2-101
2.2.5 Alternatives Considered and Eliminated from Detailed Consideration 2-102
2.3 BLM Preferred Alternative 2-107

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES 3-1
3.1 Introduction 3-1
3.1.1 Direct and Indirect Impact Significance and Mitigation 3-3
3.2 Water Resources - Water Quantity 3-4
3.2.1 Regulatory Framework 3-4
3.2.2 Affected Environment 3-4
3.2.3 Environmental Consequences and Mitigation Measures 3-62
3.3 Water Resources - Water Quality 3-180
3.3.1 Regulatory Framework 3-183
3.3.2 Affected Environment 3-184
3.3.3 Environmental Consequences and Mitigation Measures 3-207

VOLUME II of III

3.4 Geology and Mineral Resources 3-239
3.4.1 Regulatory Framework 3-241
3.4.2 Affected Environment 3-241
3.4.3 Environmental Consequences and Mitigation Measures 3-257
3.5 Paleontology 3-265
3.5.1 Regulatory Framework 3-265
3.5.2 Affected Environment 3-266
3.5.3 Environmental Consequences and Mitigation Measures 3-268
3.6 Air and Atmospheric Values 3-270
3.6.1 Regulatory Framework 3-270
3.6.2 Affected Environment 3-274
3.6.3 Environmental Consequences and Mitigation Measures 3-279
3.7 Visual Resources 3-315
3.7.1 Regulatory Framework 3-315
3.7.2 Affected Environment 3-315
3.7.3 Environmental Consequences and Mitigation Measures 3-319
3.8 Soil Resources 3-349
3.8.1 Regulatory Framework 3-349
3.8.2 Affected Environment 3-350
3.8.3 Environmental Consequences and Mitigation Measures 3-356
3.9 Vegetation Resources 3-372
3.9.1 Regulatory Framework 3-372
3.9.2 Affected Environment 3-373
3.9.3 Environmental Consequences and Mitigation Measures 3-386
3.10 Noxious Weeds, Invasive & Nonnative Species 3-400
3.10.1 Regulatory Framework 3-400

3.10.2 Affected Environment 3-401
3.10.3 Environmental Consequences and Mitigation Measures 3-402
3.11 Wetlands and Riparian Zones 3-406
3.11.1 Regulatory Framework 3-406
3.11.2 Affected Environment 3-408
3.11.3 Environmental Consequences and Mitigation Measures 3-408
3.12 Livestock Grazing and Production 3-416
3.12.1 Regulatory Framework 3-416
3.12.2 Affected Environment 3-417
3.12.3 Environmental Consequences and Mitigation Measures 3-421
3.13 Wild Horses 3-433
3.13.1 Regulatory Framework 3-433
3.13.2 Affected Environment 3-434
3.13.3 Environmental Consequences and Mitigation Measures 3-437
3.14 Land Use 3-447
3.14.1 Regulatory Framework 3-447
3.14.2 Affected Environment 3-449
3.14.3 Environmental Consequences and Mitigation Measures 3-450
3.15 Recreation and Wilderness Study Areas 3-466
3.15.1 Regulatory Framework 3-466
3.15.2 Affected Environment 3-468
3.15.3 Environmental Consequences and Mitigation Measures 3-474
3.16 Auditory Resources 3-482
3.16.1 Regulatory Framework 3-482
3.16.2 Affected Environment 3-482
3.16.3 Environmental Consequences and Mitigation Measures 3-486
3.17 Socioeconomic Values 3-499
3.17.1 Regulatory Framework 3-499
3.17.2 Affected Environment 3-500
3.17.3 Environmental Consequences and Mitigation Measures 3-529
3.18 Environmental Justice 3-571
3.18.1 Regulatory Framework 3-571
3.18.2 Affected Environment 3-572
3.18.3 Environmental Consequences and Mitigation Measures 3-574
3.19 Hazardous Materials 3-578
3.19.1 Regulatory Framework 3-578
3.19.2 Affected Environment 3-579
3.19.3 Environmental Consequences and Mitigation Measures 3-580
3.20 Historic Trails 3-587
3.20.1 Regulatory Framework 3-587
3.20.2 Affected Environment 3-587
3.20.3 Environmental Consequences and Mitigation Measures 3-591
3.21 Cultural Resources 3-598
3.21.1 Regulatory Framework 3-598
3.21.2 Affected Environment 3-598
3.21.3 Environmental Consequences and Mitigation Measures 3-602
3.22 Native American Traditional Values 3-610
3.22.1 Regulatory Framework 3-610

3.22.2 Affected Environment 3-613
3.22.3 Environmental Consequences and Mitigation Measures 3-615
3.23 Wildlife and Fisheries Resources 3-629
3.23.1 Regulatory Framework 3-629
3.23.2 Affected Environment 3-631
3.23.3 Environmental Consequences and Mitigation Measures 3-659
3.24 Transportation and Access 3-683
3.24.1 Regulatory Framework 3-683
3.24.2 Affected Environment 3-683
3.24.3 Environmental Consequences 3-684
3.25 Forest Products 3-693
3.25.1 Regulatory Framework 3-693
3.25.2 Affected Environment 3-693
3.25.3 Environmental Consequences and Mitigation Measures 3-694
3.26 Proposed Mitigation Measures Outside the BLM's Jurisdiction 3-700
3.26.1 Water Rights 3-700
3.26.2 Transportation 3-701
3.26.3 Livestock Grazing and Production 3-701
3.26.4 Air Quality 3-701
3.26.5 Socioeconomics 3-702
3.27 Relationship Between Short-Term Uses and Long-Term Productivity of the Human Environment 3-702

4 CUMULATIVE IMPACTS AND IRREVERSIBLE/ IRRETRIEVABLE COMMITMENT OF RESOURCES 4-1
4.1 Introduction 4-1
4.2 Cumulative Effects Study Areas 4-2
4.3 Past, Present, and Reasonably Foreseeable Future Actions 4-18
4.3.1 Grazing, Agriculture, and Forest Products 4-18
4.3.2 Utilities and Distribution 4-22
4.3.3 Wildland Fires, Fuels Management, and Reseeding 4-28
4.3.4 Habitat Stabilization, Rehabilitation, and Wild Horse Management Activities 4-30
4.3.5 Recreation 4-38
4.3.6 Land Development 4-41
4.3.7 Mineral Development and Exploration 4-42
4.3.8 Hazardous/Solid Waste and Hazardous Materials 4-44
4.3.9 Oil, Gas, and Geothermal Leasing and Development 4-44
4.3.10 Summary of Surface Disturbance 4-48
4.4 Evaluation of Potential Proposed Action Cumulative Impacts 4-48
4.4.1 Water Resources - Water Quantity 4-48
4.4.2 Water Resources - Water Quality 4-50
4.4.3 Geology and Mineral Resources 4-53
4.4.4 Air Resources 4-54
4.4.5 Visual Resources 4-55
4.4.6 Soils 4-56
4.4.7 Vegetation Resources 4-57
4.4.8 Noxious Weeds, Invasive and Nonnative Species 4-58
4.4.9 Wetlands and Riparian Zones 4-60

4.4.10 Livestock Grazing and Production 4-61
4.4.11 Wild Horses 4-62
4.4.12 Land Use 4-63
4.4.13 Recreation and Wilderness Study Areas 4-64
4.4.14 Auditory Resources 4-65
4.4.15 Socioeconomic Values 4-66
4.4.16 Environmental Justice 4-67
4.4.17 Hazardous Materials 4-67
4.4.18 Historic Trails 4-67
4.4.19 Cultural Resources 4-68
4.4.20 Native American Traditional Values 4-69
4.4.21 Wildlife and Fisheries Resources 4-70
4.4.22 Transportation and Access 4-74
4.4.23 Forest Products 4-74
4.5 No Action Alternative Impact Analysis 4-75
4.6 Partial Backfill Alternative Impact Analysis 4-75
4.6.1 Water Resources - Water Quantity 4-76
4.6.2 Water Resources - Water Quality 4-77
4.6.3 Geology and Mineral Resources 4-77
4.6.4 Air Resources 4-78
4.6.5 Visual Resources 4-78
4.6.6 Soils 4-78
4.6.7 Vegetation Resources 4-79
4.6.8 Noxious Weeds, Invasive and Nonnative Species 4-79
4.6.9 Wetlands and Riparian Zones 4-80
4.6.10 Livestock Grazing and Production 4-80
4.6.11 Wild Horses 4-80
4.6.12 Land Use 4-81
4.6.13 Recreation and Wilderness Study Area 4-81
4.6.14 Auditory Resources 4-81
4.6.15 Socioeconomic Values 4-81
4.6.16 Environmental Justice Effects 4-82
4.6.17 Hazardous Materials 4-82
4.6.18 Historic Trails 4-82
4.6.19 Cultural Resources 4-82
4.6.20 Native American Traditional Values 4-83
4.6.21 Wildlife and Fisheries Resources 4-83
4.6.22 Transportation and Access 4-84
4.6.23 Forest Products 4-84
4.7 Off-Site Transfer of Ore Concentrate for Processing Alternative Impact Analysis 4-84
4.7.1 Water Resources - Water Quantity 4-84
4.7.2 Water Resources - Water Quality 4-86
4.7.3 Geology and Mineral Resources 4-86
4.7.4 Air Resources 4-86
4.7.5 Visual Resources 4-87
4.7.6 Soils 4-87
4.7.7 Vegetation Resources 4-87

4.7.8 Noxious Weeds, Invasive and Nonnative Species 4-88
4.7.9 Wetlands and Riparian Zones 4-88
4.7.10 Livestock Grazing and Production 4-89
4.7.11 Wild Horses 4-89
4.7.12 Land Use 4-89
4.7.13 Recreation and Wilderness Study Area 4-90
4.7.14 Auditory Resources 4-90
4.7.15 Socioeconomic Values 4-90
4.7.16 Environmental Justice Effects 4-90
4.7.17 Hazardous Materials 4-91
4.7.18 Historic Trails 4-91
4.7.19 Cultural Resources 4-91
4.7.20 Native American Traditional Values 4-91
4.7.21 Wildlife and Fisheries Resources 4-92
4.7.22 Transportation and Access 4-92
4.7.23 Forest Products 4-93
4.8 Slower, Longer Project Alternative Impact Analysis 4-93
4.8.1 Water Resources - Water Quantity 4-93
4.8.2 Water Resources - Water Quality 4-94
4.8.3 Geology and Mineral Resources 4-95
4.8.4 Air Resources 4-95
4.8.5 Visual Resources 4-95
4.8.6 Soils 4-96
4.8.7 Vegetation Resources 4-96
4.8.8 Noxious Weeds, Invasive and Nonnative Species 4-97
4.8.9 Wetlands and Riparian Zones 4-97
4.8.10 Livestock Grazing and Production 4-98
4.8.11 Wild Horses 4-98
4.8.12 Land Use 4-98
4.8.13 Recreation and Wilderness Study Area 4-98
4.8.14 Auditory Resources 4-99
4.8.15 Socioeconomic Values 4-99
4.8.16 Environmental Justice Effects 4-99
4.8.17 Hazardous Materials 4-99
4.8.18 Historic Trails 4-99
4.8.19 Cultural Resources 4-100
4.8.20 Native American Traditional Values 4-100
4.8.21 Wildlife and Fisheries Resources 4-101
4.8.22 Transportation and Access 4-101
4.8.23 Forest Products 4-101
4.9 Irreversible/Irretrievable Commitment of Resources 4-102

5 CONSULTATION, COORDINATION, PUBLIC INVOLVEMENT, AND THE LIST OF PREPARERS FOR PREPARATION OF THE EIS 5-1
5.1 Public Scoping 5-1
5.2 Environmental Impact Statement Preparation 5-1
5.3 Comments on the Draft EIS and Responses 5-2
5.3.1 Public Review Period 5-2
5.3.2 Public Comments 5-3

5.4 Final Environmental Impact Statement Distribution 5-21
5.5 List of Preparers 5-26
5.5.1 Bureau of Land Management EIS Team 5-26
5.5.2 Third Party EIS Contractor - Enviroscientists, Inc. 5-27
5.5.3 Cooperating Agencies 5-29
5.5.4 Other Information Contributors 5-29

6 REFERENCES AND GLOSSARY 6-1
6.1 References 6-1
6.2 Glossary 6-19

7 INDEX 7-25

LIST OF TABLES

Table ES-1: Summary of Potential Environmental Effects, Mitigation Measures, and Residual Impacts ES-19
Table 1.3-1: Legal Description of Notices Held by EML 1-7
Table 1.6-1: Summary of Environmental Permits and Approvals Required for the Project 1-11
Table 2.1-1: Proposed Action Surface Disturbance 2-3
Table 2.1-2: Equipment Requirements for Project 2-4
Table 2.1-3: Waste Rock Disposal Facilities Capacities and Height 2-24
Table 2.1-4: Mount Hope Waste Rock Classification System 2-37
Table 2.1-5: Monthly Shipments of Reagents, Volumes, and Shipments 2-65
Table 2.1-6: Average Project Labor Personnel Requirements 2-69
Table 2.1-7: Soil Inventory and Projected Requirements 2-79
Table 2.1-8: Seed Mix for Elevations Above 7,500 Feet Above Mean Sea Level 2-81
Table 2.1-9: Seed Mix for Elevations between 5,500 and 7,500 Feet Above Mean Sea Level 2-81
Table 2.1-10: Conceptual Reclamation Schedule 2-83
Table 3.1-1: Elements Associated with Supplemental Authorities and Rationale for Detailed Analysis for the Proposed Action 3-1
Table 3.1-2: Resources or Uses Other than Elements Associated with Supplemental Authorities 3-2
Table 3.2-1: Mean Annual Precipitation at Weather Stations within 60 Miles of the Project Area 3-22
Table 3.2-2: Measured Flows in Some Major Drainages Located in the Hydrologic Study Area 3-23
Table 3.2-3: Hydrolithologic Units within the Study Area 3-43
Table 3.2-4: Pre-Development (circa 1955) Estimated Annual Ground Water Budget for Individual Basins and the Entire HSA 3-55
Table 3.2-5: 2009 Estimated Annual Ground Water Budget for Individual Basins and the Entire HSA 3-55
Table 3.2-6: Non-EML Water Rights That May be Affected by Project Activities 3-61
Table 3.2-7: Summary of Historic Pumping and Estimated Future Pumping and Dewatering Requirements 3-71
Table 3.2-8: Springs that May be Affected by Project Activities 3-79

Table 3.2-9: Surface Water Resources Specific Mitigation 3-93
Table 3.2-10: Estimated Water Level Change at Ground Water Rights and Wells that May be Affected by Project Activities 3-108
Table 3.2-11: Estimated Change in Annual Ground Water Budgets in Final Year of Project (2055) Under the Proposed Action, Relative to the No Action Alternative 3-113
Table 3.2-12: Estimated Change in Annual Ground Water Budgets 50 Years Post-Project (2105) Under the Proposed Action, Relative to the No Action Alternative 3-114
Table 3.2-13: Simulated Ground Water Budgets for Individual Basins and the Entire HSA in 2055 Under the No Action Alternative 3-125
Table 3.2-14: Simulated Ground Water Budgets for Individual Basins and the Entire HSA in 2105 Under the No Action Alternative 3-125
Table 3.2-15: Estimated Change in Annual Ground Water Budgets in Final Year of Project (2055) Under the Partial Backfill Alternative, Relative to the No Action Alternative 3-143
Table 3.2-16: Estimated Change in Annual Ground Water Budgets 50 Years Post-Project (2105) Under the Partial Backfill Alternative, Relative to the No Action Alternative 3-144
Table 3.2-17: Springs that May be Affected by Slower, Longer Project Alternative Which are in Addition to Those Under the Proposed Action 3-155
Table 3.2-18: Surface Water Resources Specific Mitigation for the Additional Springs Potentially Impacted by the Slower, Longer Project Alternative 3-167
Table 3.2-19: Estimated Change in Annual Ground Water Budgets in Final Year of Project (2099) Under the Slower, Longer Project Alternative, Relative to the No Action Alternative 3-177
Table 3.2-20: Estimated Change in Annual Ground Water Budgets 50 Years Post-Project (2149) Under the Slower, Longer Project Alternative, Relative to the No Action Alternative 3-177
Table 3.3-1: Standards for Toxic Materials Applicable to Designated Waters 3-185
Table 3.3-2: Comparison of Humidity Cell Test Results to Static Test Results 3-207
Table 3.3-3: Waste Characterization Summary 3-209
Table 3.3-3: Mount Hope Predicted Pit Lake Water Quality Results 3-231
Table 3.3-4: Partial Backfill Alternative Predicted Pore Water Quality Results 3-234
Table 3.4-1: Seismic Events (>3.0) Recorded Near the Project Area Between 1872 and 2008 3-256
Table 3.4-2: Summary of Stability Analyses Results for the Waste Rock Disposal Facilities and the Low-Grade Ore Stockpile 3-259
Table 3.4-3: Results of Slope Stability Analyses for the Tailings Storage Facilities 3-260
Table 3.6-1: Federal and State Ambient Air Quality Standards for Criteria Pollutants 3-271
Table 3.6-2: Ambient PM_{10} Monitoring Data from the Elko Site 3-278
Table 3.6-3: Modeled Emission Rates 3-280
Table 3.6-4: Sensitive Receptors and Universal Transverse Mercator Coordinates 3-281
Table 3.6-5: Air Pollutants and Applicable Averaging Times for the Air Quality Modeling 3-282
Table 3.6-6: Modeled Mine Production Years and Selection Criteria 3-287

Table 3.6-7: Background Values for Criteria Pollutants 3-288
Table 3.6-8: List of Sources Analyzed for the Mount Hope Project 3-289
Table 3.6-9: Highest Modeled Air Pollutant Concentrations from the Proposed Action at Receptor Points Accessible to the Public 3-292
Table 3.6-10: HAPs Emissions for the Mount Hope Project 3-297
Table 3.6-11: Highest Modeled Air Pollutant Concentration Impacts from the Proposed Action at the Defined Sensitive Receptors 3-297
Table 3.6-12: Proposed Action and Alternatives Fuel and Power Consumption and Greenhouse Gas Emissions 3-303
Table 3.7-1: BLM Visual Resource Management Classes 3-316
Table 3.8-1: Soils in the Project Area 3-351
Table 3.8-2: Summary of Soil Mapping Units and Characteristics 3-361
Table 3.9-1: Vegetation Community Types within the Project Area 3-374
Table 3.9-2: Ecological Sites by Vegetation Community Type within the Project Area 3-379
Table 3.9-3: Ecological Site within the Project Area 3-380
Table 3.9-4: Areas of Vegetation Communities Disturbed or Removed by Project Components 3-387
Table 3.12-1: Livestock Grazing Permits for the Grazing Allotments Located within the Project Area and Ten-foot Ground Water Drawdown Contour 3-417
Table 3.12-2: Grazing Capacity within the Project Area and Area Affected by Ten-Foot Water Drawdown Contour Before and During Project Activities 3-422
Table 3.14-1: BLM Rights-of-Way and Other Authorizations within the Project Area 3-450
Table 3.15-1: Recreational Areas and Estimated Annual Visitors for 2006 3-471
Table 3.15-2: 2010 Harvest by Hunt Unit and Group 3-472
Table 3.16-1: Relative Scale of Various Noise Sources 3-483
Table 3.16-2: Bases for Ambient Hourly Noise Level Assumptions 3-486
Table 3.16-3: Comparison of Predicted and Ambient Hourly Noise Levels 3-487
Table 3.16-4: Comparison of Predicted and Ambient Day-Night Levels 3-487
Table 3.16-5: State Route 278 Traffic Noise Levels Project Conditions 3-488
Table 3.16-6: Reference Noise Emission Levels and Usage Factors for Construction Equipment 3-488
Table 3.17-1: Cities and Towns within 100 Miles of the Project Area 3-503
Table 3.17-2: U.S. Census Bureau Eureka County Population Between 1880 and 2000 3-503
Table 3.17-3: Eureka County Population 2000 to 2010 3-504
Table 3.17-4: Eureka County Housing Units 1990, 2000, and 2010 Estimate 3-505
Table 3.17-5: Housing in Communities within 100 Miles of the Project Area 3-507
Table 3.17-6: Temporary Housing Resources in Communities within 100 miles of Eureka County 3-507
Table 3.17-7: Eureka County Employment, by Broad Industrial Grouping, on a Place of Work Basis, 2000-2009 (Selected Years) 3-508
Table 3.17-8: Eureka County Labor Force, Unemployed and Unemployment Rate Selected Years 3-511
Table 3.17-9: Average Annual Unemployment Rates, United States, Nevada, and Eureka County 3-511

Table 3.17-10: Eureka County Personal Income by Place of Residence: Selected Years 3-512
Table 3.17-11: Per Capita Personal Income, Eureka County, Nevada, and United States Selected Years 3-512
Table 3.17-12: Eureka County Assessed Value, Fiscal Years 2000/2001 through 2010/2011 (in Millions of Dollars) 3-513
Table 3.17-13: Eureka County Revenues (In Dollars): Fiscal Years 2006 to 2010 3-514
Table 3.17-14: Ad Valorem Tax Rates in the Town of Eureka: Fiscal Year 2010/20113-515
Table 3.17-15: Eureka County Budgeted Expenditures Fiscal Years 2006 to 2010..... 3-515
Table 3.17-16: Eureka County Budget Summary, Fiscal Years 2006 to 2010..... 3-516
Table 3.17-17: Eureka County Government Full Time Employees by Function, Fiscal Years 2007 to 2010 3-519
Table 3.17-18: Eureka County Tutorial and Life Skills Program Participation 2010 . 3-521
Table 3.17-19: Eureka County School District Enrollment from the 1996-1997 School Year to the 2009-2010 School Year 3-525
Table 3.17-20: Eureka County School District Revenues, Fiscal Years 2005-2006 to 2009-2010 3-527
Table 3.17-21: Eureka County School District Expenditures 3-527
Table 3.17-22: Mount Hope Project Workforce Residency Assumptions, Percent of Workers 3-538
Table 3.17-23: Mount Hope Relocating Operations Worker Sensitivity Analysis Summary 3-542
Table 3.18-1: Minority Populations for Eureka Census Blocks, Nevada and the United States as a Percentage of Total Population 3-573
Table 3.18-2: Percentage of Population with Incomes Below Specific Poverty Thresholds in Areas Surrounding the Project Area and Geographic Comparison Areas 3-574
Table 3.19-1: Estimate of Annual Number of Spills Resulting from Truck Accidents Under the Proposed Action 3-582
Table 3.21-1: Cultural Resource Sites within the Project Area of Potential Effect 3-603
Table 3.22-1: Follow-up Contacts with Recognized Tribal Governments and Organizations 3-614
Table 3.23-1: Highest Single Lek Attendance for Each Lek by Sex and Year from the Falcon-Gondor Study 3-640
Table 3.23-2: Stream Riparian Assessment Data from 2001 for Birch Creek 3-654
Table 3.23-3: Stream Riparian Assessment Data from 2001 for Birch Creek Springs 3-655
Table 3.23-4: Stream Riparian Assessment Data for Pete Hanson Creek 3-655
Table 3.23-5: Stream Riparian Assessment Data from 2001 for Pete Hanson Creek Springs 3-655
Table 4.2-1: Cumulative Effects Study Areas by Resource 4-7
Table 4.2-2: Summary of Activities that May Cumulatively Affect Resources 4-10
Table 4.2-3: Surface Disturbance Associated with Projects within the Cumulative Projects Data Collection Area 4-15
Table 4.2-4: Past, Present, and Reasonably Foreseeable Future Actions for the Native American Traditional Concerns Cumulative Effects Study Area 4-17
Table 4.3-1: Summary of Allotments within the Wildlife, Special Status Species, and Migratory Birds Cumulative Effects Study Areas 4-32

Table 4.9-1: Irreversible and Irretrievable Commitment of Resources by the Proposed Action 4-102
Table 5.2-1: Number of Follow-up Contacts with Tribal Governments 5-2
Table 5.3-1: Commenters on the Mount Hope Draft EIS 5-3

LIST OF FIGURES

Figure ES.1: General Location Map ES-11
Figure ES.2: Project Area and Land Ownership ES-13
Figure ES.3: Well Field and Powerline Routes ES-15
Figure ES.4: Post Mining Topography ES-17
Figure 1.1.1: General Location Map 1-3
Figure 1.1.2: Project Area and Land Ownership 1-5
Figure 2.1.1: Early Project Life Plan View Open Pit and Facilities 2-5
Figure 2.1.2: Early Project Life Cross Section through Open Pit 2-7
Figure 2.1.3: Mid Project Life Plan View Open Pit and Facilities 2-9
Figure 2.1.4: Mid Project Life Cross Section through Open Pit 2-11
Figure 2.1.5: Late Project Life Plan View Open Pit and Facilities 2-13
Figure 2.1.6: Late Project Life Cross Section through Open Pit 2-15
Figure 2.1.7: Well Field and Powerline Routes 2-19
Figure 2.1.8: Conceptual Plant Layout 2-21
Figure 2.1.9: Location of Waste Rock Disposal Facilities 2-25
Figure 2.1.10: Operational Waste Rock Disposal Facility Cross Section 2-27
Figure 2.1.11: Conceptual Waste Rock Disposal Facility Early Mine Life 2-29
Figure 2.1.12: Conceptual Waste Rock Disposal Facility Middle of Mine Life 2-31
Figure 2.1.13: Conceptual Waste Rock Disposal Facility End of Mine Life 2-33
Figure 2.1.14: Process Flow Diagram 2-39
Figure 2.1.15: Schematic Tailings Storage Facilities 2-45
Figure 2.1.16: Tailings Storage Facility Typical Embankment Section and Details 2-49
Figure 2.1.17: Tailings Storage Facility and Reclaim Slot Location 2-51
Figure 2.1.18: Estimated Total Project-Related Construction Traffic 2-62
Figure 2.1.19: Estimated Truck Project-Related Construction Traffic 2-63
Figure 2.1.20: Estimated Car, Pickup Truck, Van, and Bus Project-Related Construction Traffic 2-64
Figure 2.1.21: Post Mining Topography 2-87
Figure 2.1.22: Post Reclamation Waste Rock Disposal Facility Cross Section 2-93
Figure 2.2.1: Partial Backfill Alternative 2-99
Figure 3.2.1: Hydrologic Study Area (HSA) for the Water Resource Analysis 3-7
Figure 3.2.2: Basin Detail of Kobeh Valley 3-9
Figure 3.2.3: Basin Detail of Diamond Valley 3-11
Figure 3.2.4: Basin Detail of the Southern Part of Pine Valley 3-13
Figure 3.2.5: Basin Detail of Antelope Valley 3-15
Figure 3.2.6: Generalized Hydrogeologic Map of the HSA 3-17
Figure 3.2.7: Extent of the Pleistocene Lakes within the Hydrographic Basins that are Part of the HSA 3-19
Figure 3.2.8: Geothermal Resources, Perennial Stream Segments, and Major Surface-Water Impoundments within the HSA 3-27
Figure 3.2.9: Surface Water Resources within Five Miles of Mount Hope 3-33

Figure 3.2.10: Aquifer Testing and Monitoring Locations in Kobeh Valley and Near Mount Hope 3-41
Figure 3.2.11: HSA Basin-Fill Aquifer Groundwater Elevations Prior to Development (circa 1955) 3-51
Figure 3.2.12: HSA Basin-Fill Aquifer Groundwater Elevations in 2005 3-53
Figure 3.2.13: Land Subsidence in Diamond Valley Interpreted From 1992 - 2000 InSAR Data 3-59
Figure 3.2.14: Non-EML-Controlled Water Rights and PWRs within HSA and 30-Mile Radius of Mount Hope 3-63
Figure 3.2.15: Historical Pumping and Estimated Future Pumping and Dewatering Requirements 3-69
Figure 3.2.16: Simulated Groundwater Elevations in 2009 3-75
Figure 3.2.17: Simulated Water Table Drawdown in 2009, Relative to Pre-Development Conditions (circa 1955) 3-77
Figure 3.2.18: Proposed Action Simulated Groundwater Level Change in Year 2055 Relative to the 2009 Conditions 3-81
Figure 3.2.19: Proposed Action Simulated Ten-Foot Water Table Drawdown Contours During 400 Years of Post-Mining Recovery 3-83
Figure 3.2.20: Water Rights within the Proposed Action Simulated Maximum Extent of Ten-Foot Water Table Drawdown 3-85
Figure 3.2.21: Proposed Action Surface Water Mitigation Components 3-91
Figure 3.2.22: Rate of Pit Lake Development Under the Proposed Action 3-109
Figure 3.2.23: Proposed Action Simulated Land Subsidence in Year 2055, Relative to 2009 Conditions 3-119
Figure 3.2.24: No Action Alternative Simulated Groundwater-Level Change in Year 2055, Relative to 2009 Conditions 3-123
Figure 3.2.25: No Action Alternative Simulated Land Subsidence in Year 2055, Relative to 2009 Conditions 3-129
Figure 3.2.26: Simulated Water Level Contours in the Backfill Area 210 Years After End of Open Pit Mining 3-131
Figure 3.2.27: Comparison of Proposed Action and Partial Backfill Alternative with Respect to Springs, Non-EML Wells and Water Rights within the Composite Maximum Extent of the Ten-foot Drawdown Contour 3-135
Figure 3.2.28: Projected Ground Water Level in Center of Pit Backfill 3-139
Figure 3.2.29: Projected Drawdown of Water Table for Proposed Action Mine Year 44 (2055) and Slower, Longer Project Alternative Mine Year 88 (2099) .. 3-157
Figure 3.2.30: Slower, Longer Project Alternative – Simulated Ten-Foot Water Table Drawdown Contours During 400 Years of Post-Mining Recovery 3-159
Figure 3.2.31: Comparison of Proposed Action and Slower, Longer Project Alternative with Respect to Springs, Non-EML Wells and Water Rights within the Composite Maximum Extent of the Ten-Foot Drawdown Contour 3-161
Figure 3.2.32: Slower, Longer Project Alternative Surface Water Mitigation Components 3-165
Figure 3.2.33: Slower, Longer Project Alternative Predicted Subsidence in Year 88 (2099), Relative to 2009 Conditions 3-181
Figure 3.3.1: Characterization Program Flow Diagram 3-189
Figure 3.3.2: Total Sulfur Histogram for Mount Hope Waste Rock Samples 3-191
Figure 3.3.3: Total Carbon Histogram for Mount Hope Waste Rock Samples 3-193
Figure 3.3.4: Net Neutralization Potential Versus Sulfide 3-195

Figure 3.3.5: Net Acid Generation Versus Net Acid Generation pH 3-199
Figure 3.3.6: Total Sulfur Versus Net Acid Generation 3-201
Figure 3.3.7: Total Sulfur Plotted Against the Average Humidity Cell pH 3-203
Figure 3.3.8: Neutralization Potential Ratio Plotted Against Average Humidity Cell pH 3-205
Figure 3.3.9: Final Pit Wall Lithologies and Alteration Assemblages in the Mount Hope Pit 3-211
Figure 3.3.10: PAG Material (Projected) in the Final Open Pit Shell 3-213
Figure 3.3.11: Conceptual Model of the Mount Hope Pit Lake 3-215
Figure 3.3.12: Projected Pit Lake Filling Curve of the Mount Hope Pit Lake 3-221
Figure 3.3.13: Projected pH and Alkalinity in the Pit Lake (SWS 2010) 3-223
Figure 3.3.14: Projected Fluoride and Sulfate in the Mount Hope Pit Lake (SWS 2010) 3-225
Figure 3.3.15: Projected Cadmium and Manganese in the Mount Hope Pit Lake (SWS 2010) 3-227
Figure 3.3.16: Projected Antimony and Zinc in the Mount Hope Pit Lake 3-229
Figure 3.4.1: General Geology of the Mount Hope Area, Nevada 3-243
Figure 3.4.2: Geologic Map of the Mount Hope Area 3-245
Figure 3.4.3: Geologic Cross Section 3-247
Figure 3.6.1: Mount Hope On-Site Meterological Station, Elko and Ely, Nevada, Monitoring Sites 3-275
Figure 3.6.2: Model Sources, Fenceline, and Receptor Locations 3-283
Figure 3.6.3: Mount Hope 2010 On-site Meteorology - Wind Frequency Distribution Diagram 3-285
Figure 3.6.4: Modeled Highest Pollutant Concentrations for the Proposed Action ... 3-295
Figure 3.7.1: Top of Mount Hope Viewshed and Key Observation Points 3-317
Figure 3.7.2: Visual Classes Within and Adjacent to the Project 3-321
Figure 3.7.3a: KOP#1: No Action Alternative 3-329
Figure 3.7.3b: KOP#1: Proposed Action Maximum Build Out (Year 32) 3-329
Figure 3.7.3c: KOP#1: Proposed Action Fully Reclaimed 3-330
Figure 3.7.3d: KOP#1: Partial Backfill Alternative Fully Reclaimed 3-330
Figure 3.7.4a: KOP#2: No Action Alternative 3-331
Figure 3.7.4b: KOP#2: Proposed Action Year 20 Build Out 3-331
Figure 3.7.4c: KOP#2: Proposed Action Maximum Build Out (Year 32) 3-332
Figure 3.7.4d: KOP#2: Proposed Action Fully Reclaimed 3-332
Figure 3.7.4e: KOP#2: Partial Backfill Alternative Fully Reclaimed 3-333
Figure 3.7.5a: KOP#3: No Action Alternative 3-335
Figure 3.7.5b: KOP#3: Proposed Action Maximum Build Out (Year 32) 3-335
Figure 3.7.5c: KOP#3: Proposed Action Fully Reclaimed 3-336
Figure 3.7.5d: KOP#3: Partial Backfill Alternative Fully Reclaimed 3-336
Figure 3.7.6a: KOP#4: No Action Alternative 3-337
Figure 3.7.6b: KOP#4: Proposed Action Maximum Build Out (Year 32) 3-337
Figure 3.7.6c: KOP#4: Proposed Action Fully Reclaimed 3-338
Figure 3.7.6d: KOP#4: Partial Backfill Alternative Fully Reclaimed 3-338
Figure 3.7.7a: KOP#5: No Action Alternative 3-339
Figure 3.7.7b: KOP#5: Proposed Action Maximum Build Out (Year 44) 3-339
Figure 3.7.7c: KOP#5: Proposed Action Fully Reclaimed 3-340
Figure 3.7.7d: KOP#5: Partial Backfill Alternative Fully Reclaimed 3-340

Figure 3.8.1: Soil Mapping Units within the Project Area 3-353
Figure 3.8.2: Soil Erodibility Hazard within the Project Area 3-357
Figure 3.8.3: Potential for Soil Use as Reclamation Fill Material and Topsoil in the Project Vicinity 3-359
Figure 3.9.1: Vegetation Communities and Wetlands/Riparian Areas 3-375
Figure 3.9.2: Existing Phreatophyte Vegetation 3-377
Figure 3.12.1: Range Allotments 3-419
Figure 3.13.1: Wild Horse Management Areas and Water Development Areas 3-441
Figure 3.14.1: Land Use Authorizations Within and Adjacent to the Project Area 3-453
Figure 3.15.1: Wilderness Study Areas and Recreation Sites 3-469
Figure 3.17.1: Social and Economic Values and Environmental Justice Study Area 3-501
Figure 3.17.2: Estimated Mount Hope Construction and Operations Workforce, First 24 Months After Project Initiation 3-532
Figure 3.17.3: Estimated Mount Hope Operations Employment 3-533
Figure 3.17.4: Estimated Secondary Employment: Construction and Initial Operations 3-534
Figure 3.17.5: Mount Hope Construction Population Impact by Worker Residency and Household Status 3-540
Figure 3.17.6: Mount Hope Housing Demand During Construction 3-544
Figure 3.20.1: Pony Express Trail 3-589
Figure 3.23.1: Deer Corridors in the Vicinity of the Mount Hope Project 3-635
Figure 3.23.2: Greater Sage-Grouse Leks and Distribution 3-641
Figure 3.23.3: Pygmy Rabbit and Raptor Observations within the Mount Hope Project Area 3-645
Figure 3.23.4: Lahontan Cutthroat Trout Occupied Habitat and Recovery Areas 3-649
Figure 3.25.1: Forest Products in the Mount Hope Project Area 3-695
Figure 4.2.1: Large Scale Cumulative Effects Study Areas Map 4-3
Figure 4.2.2: Small Scale Cumulative Effects Study Areas Map 4-5
Figure 4.2.3: Cumulative Projects Data Collection Area (except Native American) 4-13
Figure 4.3.1: Grazing Allotments within the Air Quality and Wildlife and Fisheries CESAs Map 4-19
Figure 4.3.2: Rangeland Improvements and Land Use Authorizations 4-23
Figure 4.3.3: Piñon-Juniper Vegetation Communities, Areas of Commercial Pine Harvesting, and Wildland Fire Activity within the Native American Traditional Values CESA 4-25
Figure 4.3.4: Noxious Weed Occurrences within the Invasive Non-Native Species CESA 4-39
Figure 4.3.5: Mineral Projects and Oil and Gas Use within the CESAs 4-45
Figure 4.4.1: Cumulative Action Scenario - Projected Water Table Drawdown at Project Year 44, End of Year 2055, Relative to Pre-Development (1955) Conditions 4-51
Figure 4.4.2: Perennial Waters and Areas of Dewatering within the Native American Traditional Values CESA 4-71

VOLUME III of III

APPENDICES

Appendix A: Inconsistencies Between the Mount Hope Project and the Land Use Plans, Policies, and Controls of Eureka County (14 pages)
Appendix B: Eureka Moly LLC Tailings Siting Evaluation (32 pages)
Appendix C: Eureka Moly LLC Water Resources Monitoring Plan (19 pages)
Appendix D: Mount Hope Project Mitigation Summary Plan (12 pages)
- Attachment 1: Pony Express Trail Access Mitigation (4 pages)
  - Addendum A: Pony Express Trail Travel Hazard Training Checklist (3 pages)
- Attachment 2: Wild Horse and Wildlife Water Source Mitigation Plan (8 pages)
  - Attachment A: Whistler Mountain (NV0608), Romano Stock Well (1 page)
  - Attachment B: Whistler Mountain (NV0608), Stinking Spring (1 page)
  - Attachment C: Roberts Mountain (NV0607), Big Windmill (1 page)
  - Attachment D: Roberts Mountain (NV0607), Old Stock Well (1 page)
  - Attachment E: GMI Production Well RWX-222 (1 page)
  - Attachment F: Whistler Mountain (NV0608), GMI Production Well RWX-220 (1 page)
- Attachment 3: Mount Hope Greater Sage-Grouse Conservation Measures (7 pages)
- Attachment 4: Mitigation Strategy for protecting important roosting colonies of Townsend's big-eared bats at the Mount Hope Mine by Eureka Moly, LLC (15 pages)

Appendix E: Mount Hope Socioeconomic Supplemental Analysis (14 pages) and ECSD Data (5 pages)
Appendix F: Native American Consultation Documentation (16 pages)
Appendix G: BLM Sensitive Species List (2 pages)
Appendix H: Draft EIS Public Comments and Responses (475 pages)

This Page Intentionally Left Blank

APPENDIX A

INCONSISTENCIES BETWEEN THE MOUNT HOPE PROJECT AND THE LAND USE PLANS, POLICIES, AND CONTROLS OF EUREKA COUNTY

APPENDIX A
Inconsistencies Between the Mount Hope Project and the Land Use Plans, Policies, and Controls of Eureka County

The National Environmental Policy Act (NEPA) requires an EIS to discuss certain factors. See 42 U.S.C. § 4332(2) (C)(i-v). As set forth by NEPA's implementing regulations, one of these factors is potential conflicts between a proposed action and the objectives of Federal, regional, State and local land use plans, policies and controls for the area concerned. 40 C.F.R. § 1502.16. Where an inconsistency exists between the proposed and any approved State or local plan or law, the environmental impact statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.

Also related to state and local planning, 40 C.F.R. § 1506.2(d) requires that the EIS "discuss any inconsistency of a proposed action with any approved State or local plan and laws," and if an inconsistency exists, describe "the extent to which the agency would reconcile its proposed action with the plan or law."

The Council on Environmental Quality (CEQ) regulations at 40 CFR 1502.16(c) require the Environmental Consequences section of an EIS to disclose "possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned." This appendix is referenced in the Environmental Consequences section and provides a complete discussion of any inconsistencies as perceived by Eureka County in compliance with the CEQ regulations.

The CEQ has also provided guidance for situations where a proposed action conflicts with local plans, policies, and controls through their publication: *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations (46 Fed. Reg. 18026 (1981)).* Question 23c asks, "What options are available for the decisionmaker when **conflicts with such plans** or policies are identified?" CEQ's answer states, "After identifying any potential land use conflicts, the decisionmaker must weigh the significance of the conflicts, among all the other environmental and non-environmental factors that must be considered in reaching a rational and balanced decision. Unless precluded by other law from causing or contributing to any inconsistency with the land use plans, policies or controls, the decisionmaker retains the authority to go forward with the proposal, despite the potential conflict…"

On May 30, 2012 the BLM sent a letter to Eureka County requesting a comprehensive list of potential inconsistencies between the Mount Hope Project and the land use plans, policies, and controls adopted by Eureka County. On June 22, 2012 Eureka County, as a Cooperating Agency in preparation of the EIS, responded by identifying several components of the Mount Hope Project that they have determined are in conflict their local planning efforts.

Each of the items below documents the perceived inconsistencies as described by Eureka County. Where there is potential for an inconsistency, each item also includes a discussion of the extent to which the BLM could reconcile the proposed action with the applicable State or local plan or law.

Item 1

"1.1 Page 1-2: We have continued to point out to BLM that many of these regulations require coordination with Eureka County and efforts to achieve consistency with Eureka County plans and policies to the maximum extent possible. Despite our continual requests, however, the DEIS makes no effort to discuss these inconsistencies. This paragraph can legitimately claim that the EIS complies with NEPA only when BLM has taken the maximum effort to reconcile these conflicts. We will continue to point out these specific areas again in the comments that follow."

Although the BLM is not required to achieve consistency between the proposed action and State or local laws, plans and policies (*see, e.g.*, 40 C.F.R. § 1506.2(d)), it has made extraordinary efforts to coordinate with Eureka County. Prior to the release of the Draft EIS for public review, the BLM continually attempted to schedule a meeting to discuss Eureka County's comments on the Administrative Draft EIS, but the county could not coordinate a time to meet. Additionally, the BLM formally requested that Eureka County identify all perceived inconsistencies in a letter dated May 30, 2012, so as to ensure that all potential inconsistencies would be documented in the Mt. Hope Project Final Environmental Impact Statement (FEIS). On June 22, 2012, Eureka County provided a response that includes all of the items listed in this appendix. The BLM is not required to reconcile perceived inconsistencies, however, this appendix discusses the BLM's reconciliation efforts, consistent with NEPA requirements.

Item 2

1.5.4 Page 1-10: We asked BLM to revise this section on both ADEIS with inclusion of language to read, "Some elements of the Proposed Action would be in conformance with these plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies." BLMs response was that "Based on a review of the County Plan, no specific instances of non-conformance were identified." BLM inaccurately cites general County policy support of mining and economic development in a vacuum without taking into account all other plans, goals, and policies as a whole related to impacts on air quality, wildlife, water resources, private property, grazing, etc. Eureka County specifically pointed out these inconsistencies in our previous comments. Again, we highlight the following policies, word-for-word, that components of the Proposed Action are in conflict with including, "use of the best available science and technology to ensure adequate protection of land, air, and water resources …[including]… adequate and proper mitigation; maintaining water resources in a condition that will render it useable by future generations for the full range of beneficial uses that further a viable and stable economic and social base for its citizens; maintain or improve soil, vegetation and watershed resources in a manner that perpetuates and sustains a diversity of uses while fully supporting the custom, culture, economic stability and viability of Eureka County and our individual citizens; mitigation of mining activities that may impair the economic future of Eureka County citizens; prevention of significant deterioration of the superior air quality found in Eureka County; and maintain, improve or mitigate…impacts to habitat in order to sustain viable and harvestable populations of…species as well as wetland/riparian habitat for…other game and non-game species." BLM can only say that the EIS is in compliance when the maximum effort has been made by BLM to work with Eureka County, the guardian of its own policies, to reconcile these conflicts.

The last sentence of the first paragraph in Section 1.5.4 has been revised to say “Some elements of the proposal would be in conformance with plans and policies adopted by Eureka County while other elements of the proposed mine could prove inconsistent with these plans and policies.” For example, the proposal is consistent with the County’s general policy support of mining and economic development (i.e., “Goal: Facilitate environmentally responsible exploration, development and reclamation of oil, gas, geothermal, locatable minerals, aggregate and similar resources on federal lands.”). However, these forms of development (both generally and as would be implemented via the proposed action) necessarily have some impact to environmental values like air quality, wildlife water resources, grazing, etc.; therefore, advancing one set of goals and policies may be inconsistent with other goals and policies. BLM’s own review of the Eureka County Master Plan and other local planning documents, as well as comments from Eureka County, indicate that this may be the case here. However, the proposed action largely reconciles these goals and policies by including measures to reduce or avoid adverse impacts , as described throughout the Final EIS. The Final EIS further reconciles these goals and policies by proposing mitigation measures for various resources to further reduce or avoid impacts where they are anticipated. To the extent the policies and goals cited by Eureka County do not prohibit adverse impacts, but instead require mitigation or similar attempts to balance competing goals and policies, the proposed action and Final EIS satisfy those requirements.

The EIS uses the best available science and technology to analyze potential impacts, including all of the resources referenced by Eureka County.

Item 3

3.2.3.3. 2 Page 3-108: Additionally, this evaporation of water is directly in conflict with our county Master Plan that mandates that water extracted for mining be used "in a manner that returns water to the ground in the same basin it is withdrawn with minimal evaporation and transpiration loss" (p. 6-55). Please revise to remove language of evaporation being a beneficial use and clearly state that the large evaporative losses of water due to the Project are inconsistent with our Master Plan.

The BLM acknowledges that Eureka County, through its Master Plan, “supports . . . disposal of mine dewatering water in a manner that returns water to the ground in the same basin it is withdrawn with minimal evaporation and transpiration loss.” The BLM does not read the Master Plan to require disposal in this manner. To the extent the County believes that the Master Plan somehow mandates that all water extracted for mining be returned to the ground in the same basin from which it is withdrawn with minimal evaporation and transpiration loss, the Proposed Action would be inconsistent with the Master Plan. However, mining is a beneficial use under Nevada water law and the distribution of processed material in the Tailing Storage Facilities are part of the mining use. Evaporation caused by the mining use of water is not contrary to Nevada law and has not been modified in the project design. It should be noted that the Seventh Judicial District Court for the State of Nevada ruled on June 13, 2012 to uphold the Nevada State Engineer's decision regarding the issuance of the water rights for the Project with a total combined duty of 11,300 acre-feet per year. The BLM, under the 3809 regulations, has an obligation to prevent not only unnecessary degradation but also degradation that, while necessary to mining, is undue or excessive. The extraction and use of groundwater is necessary to mining and the removal or use is not undue or excessive.

Additionally, as noted in response to Item 2, not all goals and policies described in the Eureka County Master Plan are consistent with one another and the furtherance of the mining and economic development goals through the Proposed Action necessarily have impacts to other policies and goals related to protection of natural resources. The mitigation measures proposed and analyzed in the Final EIS, along with measures contained in the Plan of Operations to reduce impacts to natural resources, largely reconcile any such perceived inconsistencies.

Item 4

3.6 Page 3-254: Although analyses of air quality describe that the Project will not exceed the NAAQS (or NSAAQS), it is never recognized that the Project will, in fact, degrade the air quality of Eureka County regardless of a standard. This is in direct conflict with our Master Plan policy which is to prevent "deterioration of the superior air quality found in Eureka County." Please make this clear and describe what further can be done to protect the air quality of Eureka County through realistic and committed mitigation measures (and adequate monitoring to measure for degradation).

The FEIS recognizes that any anthropogenic activity, including the future economic and industrial development that Eureka County mentions, would have some effect on air quality. In quoting Eureka County's Master Plan, the commenter has omitted the word "significant". A reading of the entire stated objective, "Prevent significant deterioration of the superior air quality found in Eureka County", shows that the Master Plan recognizes the possibility of air quality effects and that determining attainment of the goal is not quantified. It also plainly acknowledges that some level of deterioration to air quality is acceptable. As noted in Section 3.6.3 of the EIS, no impacts to air quality are considered to be significant. The FEIS demonstrates that the project will meet all applicable health-based standards and discloses the potential impacts to air quality.

Item 5

3.12.3.2 and 3.12.3.3 Page 3-399: Therefore, the entire burden of directly lost AUMs will fall upon livestock grazing. This is also a specific example of the Proposed Action being in direct conflict with the policies of Eureka County as outlined in our Master Plan and County Code and this conflict must be described and documented in the EIS. Eureka County calls for no net-loss of AUMs.

There is no text in the Eureka County Master Plan that specifically states a goal of “no net-loss of AUMs.” The Master Plan instead includes an argument for grazing permits to be considered as private property rights, for which “Eureka County maintains a no-net-loss policy” under Title 9, Section 30.060.J.1 of the Eureka County Code. The Master Plan refers to the Taylor Grazing Act and other laws to support its characterization of grazing permits as property rights. However, the Taylor Grazing Act at 43 USC § 315(b) states that “such permits shall be for a period of not more than ten years, subject to the preference right of the permittees to renewal in the discretion of the Secretary of the Interior, who shall specify from time to time numbers of stock and seasons of use.” Although a permittee may have preference rights for renewal of the permit, the number of stock, seasons of use, and other conditions remain the sole discretion of the Secretary of the Interior. Additionally, 43 USC § 315(b) also states that “the issuance of a permit pursuant to the provisions of this subchapter shall not create any right, title, interest, or estate in or to the lands.” Accordingly, to the extent the County asserts that the Master Plan requires the BLM to

treat AUMs as private property rights, such portion of the Master Plan is contrary to federal law and cannot be reconciled with the Proposed Action.

The Proposed Action is consistent with the Taylor Grazing Act and all other federal statutes and regulations. The suspension of AUMs resulting from this project was calculated using the same method as when they were originally allocated based on temporary and permanent loss of acreage available for livestock grazing. As part of the 10-year permit renewal cycle, the BLM will conduct an Ecological Site Inventory that will involve an evaluation of the maximum AUM capacity for each of the affected allotments. Since the mine proposal is not a grazing action, it is not being conducted as part of the EIS. Accordingly, to the extent the County asserts that the Master Plan requires the BLM to treat AUMs as private property rights, such portion of the Master Plan is contrary to federal law and cannot be reconciled with the Proposed Action.[1]

Item 6

This is another specific example of the Proposed Action being in direct conflict with the policies of Eureka County as outlined in our Master Plan and County Code and this conflict must be described and documented in the EIS. These documents call for no net-loss of AUMs and "mitigation of mining activities that may impair the economic future of Eureka County citizens." Since this Project will impair the economic future of Eureka County ranches, albeit only a few, it is inconsistent with our plans and policies.

There is no text in the Eureka County Master Plan that specifically states a goal of "no net-loss of AUMs." The Master Plan instead includes an argument for grazing permits to be considered as private property rights, for which "Eureka County maintains a no-net-loss policy" under Title 9, Section 30.060.J.1 of the Eureka County Code. The Master Plan refers to the Taylor Grazing Act and other laws to support its characterization of grazing permits as property rights. However, the Taylor Grazing Act at 43 USC § 315(b) states that "such permits shall be for a period of not more than ten years, subject to the preference right of the permittees to renewal in the discretion of the Secretary of the Interior, who shall specify from time to time numbers of stock and seasons of use." Although a permittee may have preference rights for renewal of the permit, the number of stock, seasons of use, and other conditions remain the sole discretion of the Secretary of the Interior. Additionally, 43 USC § 315(b) also states that "the issuance of a permit pursuant

---

[1] The Master Plan cites other references including the District Court decision for *Public Lands Council, et al. v. Babbitt*. However, the Tenth Circuit Court of Appeals overturned portions of the District Court decision in 2000 and held that "the conditions placed on permits reflected the leasehold nature of grazing privileges, consistent with the fact that Congress had made the Secretary the landlord of the public range and basically made the grant of grazing privileges discretionary. The grazing regulations in effect from 1938 to the present day made clear that the Department retained the power to modify, fail to renew, or cancel a permit or lease for various reasons." Additionally, the Court of Appeals held that "the Secretary, consistent with 43 USC § 315f…was authorized to reclassify and withdraw land from grazing altogether and devote it to a more valuable and suitable use."

to the provisions of this subchapter shall not create any right, title, interest, or estate in or to the lands."

The Master Plan cites other references including the District Court decision for *Public Lands Council, et al. v. Babbitt*. However, the Tenth Circuit Court of Appeals overturned portions of the District Court decision in 2000 and held that "the conditions placed on permits reflected the leasehold nature of grazing privileges, consistent with the fact that Congress had made the Secretary the landlord of the public range and basically made the grant of grazing privileges discretionary. The grazing regulations in effect from 1938 to the present day made clear that the Department retained the power to modify, fail to renew, or cancel a permit or lease for various reasons." Additionally, the Court of Appeals held that "the Secretary, consistent with 43 USC § 315f…was authorized to reclassify and withdraw land from grazing altogether and devote it to a more valuable and suitable use."

As discussed in response to Item 5, the Proposed Action is consistent with the Taylor Grazing Act and all other federal statutes and regulations. However, due to Eureka County's incomplete interpretation of this law and other referenced documents in the Master Plan, the Proposed Action cannot be reconciled.

The Master Plan goes on to state that "It is critical to the welfare of the citizens of Eureka County and the nation that mining on state and federal lands remains an open and free enterprise. Eureka County upholds the tenet that mining claims are compensable property belonging to individuals or groups of individuals. Eureka County supports:… 6. Mitigation of mining activities that may impair the economic future of Eureka County citizens through bilateral or multi-lateral consultations with the Board of Eureka County Commissioners." The BLM has made every effort to coordinate with the Board of Eureka County Commissioners, has modified the Proposed Action in multiple instances in response to county requests, and has otherwise suggested mitigation to reduce economic impacts to non-mining interests. The BLM does not have the legal authority to require implementation of the type of mitigation discussed in the comment, however, additional language has been added to the EIS in Section 3.26 providing suggested mitigation where such measures fall outside the jurisdiction of the BLM. The Proposed Action cannot be further reconciled.

Item 7

3.12.3.3 Page 3-400: It is improper for BLM to state that the permanent loss of 32 AUMs is "minimal." First of all, this is directly in conflict with Eureka County's Master Plan and County Code.

The text in the paragraph following Table 3.12-2 has been revised in the FEIS as follows, " The grazing and agricultural service sectors of the Eureka County economy would be marginally affected by the reduction in AUMs associated with the Proposed Action due to the construction of the fence around 14,204 acres of the Project Area. The fence would exclude access to portions of the Roberts Mountains and Romano Allotments and result in a reduction of 781 AUMs for approximately 70 years and 32 AUMs permanently from the development of the open pit. According to the Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada (Resource Concepts, Inc. 2001), the total economic impact associated with each AUM equals $53.40 (1999 dollars) ($73.75 in 2012 dollars) annually. This value specifically estimates

the direct, indirect, and induced impacts of industry output and added value of grazing in Nevada. Applying this value to the potentially and temporarily AUMs displaced under the Proposed Action, the total economic impact could be an annual reduction of $41,705 (1999 dollars) ($57,597 in 2012 dollars). This would be a $15,539 (1999 dollars) ($21,460 2012 dollars) impact resulting from displaced Romano Allotment AUMs and a $26,166 (1999 dollars) ($36,137 2012 dollars) impact resulting from displaced Roberts Mountain Allotment AUMs. While the impact may not be significant to the ranching community, the impact may be meaningful to invidual ranch operations. However, it is important that this impact reflects the total economic impact not lost revenue for specific operators. The subsequent two paragraphs in greater detail the economic impact to grazing investigated in the Nevada Grazing Statistics Report and Econonic Analysis for Federal Lands in Nevada Report." Even if this finding can be construed as somehow inconsistent with the Master Plan, the permanent loss of 32 AUMs due to the development of the open pit cannot be avoided and, therefore, the Proposed Action cannot be modified to avoid the alleged conflict.

Item 8

3.12.3.3 Page 3-401: What must also be taken into account is that even with successful reseeding of impacted vegetation areas (phreatophytes, riparian vegetation, wet meadows, etc.) there is not a total removal of impacts to AUM availability. If an impact were to occur to vegetation due to the Project, the areas re-vegetated would likely be subject to BLM grazing closures until the area were to meet BLM established objectives. Through no fault of their own, a grazing permittee would be impacted while re-vegetation efforts are taking place and would likely suffer large economic impacts. This has been seen in many cases where ranchers have had to reduce their herds strictly because of closure due to re-vegetation treatments on the ground. Eureka County has a policy of no loss of AUMs, even temporarily.

There is no text in the Eureka County Master Plan that specifically states a goal of “no net-loss of AUMs.” The Master Plan instead includes an argument for grazing permits to be considered as private property rights, for which “Eureka County maintains a no-net-loss policy” under Title 9, Section 30.060.J.1 of the Eureka County Code. The Master Plan refers to the Taylor Grazing Act and other laws to support its characterization of grazing permits as property rights. However, the Taylor Grazing Act at 43 USC § 315(b) states that “such permits shall be for a period of not more than ten years, subject to the preference right of the permittees to renewal in the discretion of the Secretary of the Interior, who shall specify from time to time numbers of stock and seasons of use.” Although a permittee may have preference rights for renewal of the permit, the number of stock, seasons of use, and other conditions remain the sole discretion of the Secretary of the Interior. Additionally, 43 USC § 315(b) also states that “the issuance of a permit pursuant to the provisions of this subchapter shall not create any right, title, interest, or estate in or to the lands.” Accordingly, to the extent the County asserts that the Master Plan requires the BLM to treat AUMs as private property rights, such portion of the Master Plan is contrary to federal law and cannot be reconciled with the Proposed Action.

The Proposed Action is consistent with the Taylor Grazing Act and all other federal statutes and regulations. Potential closures following re-vegetation efforts will be evaluated at the time of implementation and remain under the discretion of the Authorized Officer to support achievement of stated revegetation goals.

Item 9

3.12.3.3 Page 3-401: Revise to make it clear that EML will mitigate the impact to grazing permittees, not "would work" to mitigate the impact. We request the revision to read, "EML will fully mitigate and offset the loss of AUMs as a result of the Proposed Action by agreement with impacted grazing permittees. For purposes meant to inform the discussion between EML and the impacted grazing permittee, mitigation could include, but is not limited to: 1) Provide a livestock forage seeding on federally administered land on which the impacted grazing permittee is authorized to graze livestock or on private land owned by the impacted grazing permittee; 2) Provide an alternative livestock watering source in any area where forage was previously unused or underused due to lack of a viable water source on either federally administered land on which the impacted grazing permittee is authorized to graze livestock or private land owned by the impacted grazing permittee; 3) Implement a Rangeland Improvement Project on federally administered land on which the impacted grazing permittee is authorized to graze livestock or a project on private land owned by the impacted grazing permittee which would improve livestock production, forage availability, or rangeland condition (e.g., fencing, weed control, brush management, pinion-juniper thinning)." This language is consistent with (and nearly identical to) Eureka County's policy regarding AUM loss.

The BLM does not have the legal authority to require implementation of the type of mitigation discussed in the comment, however, additional language has been added to the EIS in Section 3.26 providing suggested mitigation where such measures fall outside the jurisdiction of the BLM. The Proposed Action cannot be further reconciled.

Item 10

3.13.3.3.1 Page 3-415: How can EML obtain a water right to water wild horses when EML has no ownership of wild horses and would be disallowed under State Law? Also, EML improvement of current stockwater sources that have certificated (and some vested) rights and changing the use to wild horses is not consistent with Nevada Water Law or Eureka County's Master Plan and County Code. There needs to be more thorough description in the text (and Appendix C) describing the legal mechanisms to carry forward this mitigation as we believe it is unlawful.

There are several legal mechanisms that allow for the provision of water developments for wild horses. Wild horses are considered to be wildlife and are covered under NRS 533.367, which states that "before a person may obtain a right to the use of water from a spring or water which has seeped to the surface of the ground, the person must ensure that wildlife which customarily uses the water will have access to it." One of the water sources proposed by EML is a spring that would be subject to this requirement. The other five water developments would be supplied through wells and NDWR is allowed to specify wildlife as the type of use. NDWR can also specify "Environmental Remediation" as a beneficial use. Either of these methods could be used in transferring the water right for provision to wild horses. Alternatively, EML could transfer the water right to the BLM, NDOW or even a nearby rancher. Any of these could be used to meet the intent of mitigating impacts to wild horses. A description of the exact mechanism in the EIS would be speculative since there are multiple options available. Since this inconsistency is based on a difference of interpretation of Nevada water law, it cannot be further reconciled in the Proposed Action.

Item 11

3.14.3.3.3 Page 3-429: First, this section fails to acknowledge or describe the County Code which carries force of law, much more so than county planning documents. As previously requested many times over the past few years, we ask BLM to fully review our County Code, County Plans and various County Resolutions and meet with us to discuss the policies of Eureka County before making consistency determinations. Second, we asked BLM to revise this section on both ADEIS. We again asked that there be an inclusion of language to read, "Some elements of the Proposed Action would be in conformance with these plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies." BLMs response was that "Based on a review of the County Plan, no specific instances of non-conformance were identified." BLM inaccurately cites general County policy support of mining and economic development in a vacuum without taking into account all other plans, goals, and policies as a whole related to impacts on air quality, wildlife, water resources, private property, grazing, etc. Again, we highlight the following policies, word-for-word, that components of the Proposed Action are in conflict with including, "use of the best available science and technology to ensure adequate protection of land, air, and water resources" including "adequate and proper mitigation; maintaining water resources in a condition that will render it useable by future generations for the full range of beneficial uses that further a viable and stable economic and social base for its citizens; maintain or improve soil, vegetation and watershed resources in a manner that perpetuates and sustains a diversity of uses while fully supporting the custom, culture, economic stability and viability of Eureka County and our individual citizens; mitigation of mining activities that may impair the economic future of Eureka County citizens; prevention of significant deterioration of the superior air quality found in Eureka County; and maintain, improve or mitigate…impacts to habitat in order to sustain viable and harvestable populations of…species as well as wetland/riparian habitat for…other game and non-game species." BLM can only say that the EIS is in compliance when the maximum effort has been taken by BLM to work with Eureka County, the guardian of its own policies, to reconcile these conflicts.

Section 1.5.4 of the FEIS has been revised to include the following sentence, "The BLM acknowledges that EML would have to comply with any applicable Eureka County codes, to the extent that they are not preempted by federal law." Additionally, the FEIS includes the following language suggested by Eureka County: "Some elements of the Proposed Action would be in conformance with Eureka County plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies."

For example, the proposal is consistent with the County's general policy support of mining and economic development (i.e., "Goal: Facilitate environmentally responsible exploration, development and reclamation of oil, gas, geothermal, locatable minerals, aggregate and similar resources on federal lands."). However, these forms of development (both generally and as would be implemented via the proposed action) necessarily have some impact to environmental values like air quality, wildlife water resources, grazing, etc.; therefore, advancing one set of goals and policies may be inconsistent with other goals and policies. The BLM's own review of the Eureka County Master Plan and other local planning documents, as well as comments from Eureka County, indicate that this may be the case here. However, the proposed action largely reconciles these goals and policies by including measures to reduce or avoid adverse impacts , as described throughout the Final EIS. The Final EIS further reconciles these goals and policies by

proposing mitigation measures for various resources to further reduce or avoid impacts where they are anticipated. To the extent the policies and goals cited by Eureka County do not prohibit adverse impacts, but instead require mitigation or similar attempts to balance competing goals and policies, the proposed action and Final EIS satisfy those requirements.

The FEIS uses the best available science and technology to analyze potential impacts to land, air, water, and other resources. Analysis and mitigation measures for soil and vegetation resources are addressed in sections 3.8 and 3.9, respectively. Mitigation of mining activities with relation to socioeconomic impacts is addressed in Sections 3.17 and 3.26 of the FEIS. Sections 3.11 and 3.23 identify impacts and mitigation measures for wetlands and riparian zones and wildlife and fisheries resources, respectively. The BLM has made every effort to coordinate with the Board of Eureka County Commissioners and has modified the Proposed Action in multiple instances in response to county requests. As to other applicable law and regulation, EML has secured all of the required water permits and approvals from the State Engineer and mitigation for potential impacts to water resources, both quantity and quality, has been included in Sections 3.2 and 3.3 of the FEIS. An air quality permit has been issued by the State of Nevada with monitoring requirements and emissions limitations to ensure compliance with all applicable air quality regulations.

Item 12

3.14.3.3.3 Page 3-429: The conclusion reached is incorrect. Eureka County plans and policies often cover private as well as public lands. Because the land use section of the DEIS excludes private lands, it is not possible for BLM to reach the conclusion of no conflicts with land use plans and regulations currently in place to guide development in Eureka County. Previous ADEIS comments from Eureka County as a Cooperating Agency have explained how the project is in conflict with the County's land use plans and regulations.

The Final EIS includes the following language suggested by Eureka County, "Some elements of the Proposed Action would be in conformance with Eureka County plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies." The BLM acknowledges that EML would have to comply with any applicable Eureka County codes. This appendix further documents the BLM's consideration of potential inconsistencies with Eureka County land use regulations, plans and policies.

Item 13

3.14.3.3.4 Page 3-429: It is inappropriate for BLM to continue to assert, as highlighted in BLMs response to our previous ADEIS comment (see 1961 among others) that "it is speculative to assert that the physical arrangement of Eureka would be disrupted or divided due to the project and the need for mine employee housing in Eureka." First of all, it is not just Eureka that we are concerned about disrupting and dividing; it is also Diamond Valley. Second, EMLs failure to come to grips with the lack of housing availability and land availability to cover both temporary construction worker housing (nearly 500 people) as well as permanent employees (roughly 400 people not including secondary employment) magnifies our concern about potential ramshackle development and fragmentation of our agricultural valley in addition to bifurcation of the Town of Eureka. The DEIS must be revised to speak to the possibility of this actually happening and

outline what will be done to minimize these impacts. This again is at direct odds with our Master Plan that calls for "orderly and common-sense development."

The BLM has no jurisdiction over the placement of housing and other development on private land as that authority typically falls under the purview of local government through applicable master plans, policies, and adopted codes. Eureka County raises concerns over "potential ramshackle development and fragmentation of our agricultural valley in addition to bifurcation of the Town of Eureka." However, the Eureka County Code, Title 8 states that "it is declared to be the policy of the County to consider the division of land and the subsequent development of the land as subject to the control of the County pursuant to the Master Plan for the orderly, planned, efficient, and economical development of the County." The Eureka County Code provides procedures for the approval of tentative and final maps in order to subdivide land and design standards for minimum lot sizes, streets, alleys, pedestrian ways, easements for drainage and utilities, water supply and fire hydrants, sewer, garbage, and on-site drainage.

Since these issues will remain under the jurisdiction of Eureka County with regard to the Mount Hope Project, the EIS has not been modified to speculate on future patterns of development within Eureka or Diamond Valley.

Item 14

3.15.2.2.1 Page 3-444: Impacts to Roberts Creek would be directly inconsistent with our Master Plan and County Code (see quoted text on p. 3-437). However, if impacted, at a minimum, mitigation must consist of 1) continued water flow to Roberts Creek; 2) comprehensive restoration activities to ensure habitat for fishing, hunting, wildlife viewing, and camping including re-vegetation, fishery stabilization, stocking of fish, and improvement of camping areas and access.

It is unclear which portion of the Master Plan and County Code impacts to Roberts Creek allegedly "would be directly inconsistent" with, as the discussion on page 3-437 pertains to Recreation and Wilderness Study Areas. However, the EIS takes a hard look at potential impacts from groundwater consumption by the Proposed Action and proposes adequate mitigation for such impacts, consistent with the BLM's understanding of the County's Master Plan. Monitoring to provide advance warning of surface water impacts would be required as part of project approval. Table 3.2-9 of the EIS has been revised to make clear that mitigation may be required for Project-caused reductions, rather than "cessation" of flows, for Roberts Creek. Enhancement or replacement of surface flows with ground water is one of the potential mitigation options, should impacts occur, as described in the EIS. Additionally, Mitigation Measure 3.11.3.3-3 states that "EML, in coordination with the BLM, would identify sites for mitigation in the area affected and implement mitigation measures at a three to one ratio with local cuttings, plugs, and seeds within one year of direct disturbance. EML would monitor these sites on an annual basis for at least three years after treatment to ensure effectiveness." The BLM may select other options from the list provided in section 3.2.3 or identify other effective mitigation options, should impacts occur or be deemed imminent. Additionally, stocking of fish is conducted by NDOW and is outside the jurisdiction of the BLM.

Item 15

3.17.1 Page 3-467: 43 CFR 1506.2 does not require consideration but integration and where inconsistency exists, the EIS should describe the extent to which the agency would reconcile its proposed action with the local plan or policy.

CEQ regulations 40 CFR 1506.2 does not require integration, it merely states:

"To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law."

This appendix contains the description of perceived inconsistencies and documents the BLM's efforts to reconcile the proposed action with local plans and policies.

Item 16

3.23.1 Page 3-592: Please include the language from the County's Master Plan regarding the policies for wildlife and fisheries (Master Plan 6.2.4). Some of the specific language that is applicable includes: "GOAL: Maintain, improve or mitigate wildlife impacts to habitat in order to sustain viable and harvestable populations of big game and upland game species as well as wetland/riparian habitat for waterfowl, fur bearers and a diversity of other game and non-game species. OBJECTIVES: 1) Coordinate with the Eureka County Wildlife Advisory Board, Eureka County Natural Resources Advisory Commission, Nevada Department of Wildlife, affected private property interests, lessees and permittees to develop...guidelines for future site specific management plans affecting upland, water fowl and big game habitat; 2) Community economic concerns and values will be obtained from the Eureka County Wildlife Advisory Board, Eureka County Natural Resources Advisory Commission, Eureka County Economic Development Board and the Board of Eureka County Commissioners; the voice of Eureka County citizens provides the basis for wildlife and wildlife habitat management...; 3) ...where necessary mitigate, harmful impacts to rangelands, woodlands, native wildlife species...Mitigation must accommodate impacts that have accumulated since initial resource allocation.; 4) Manage wildlife populations and wildlife habitat to enhance species native to Eureka County habitats. Exceptions to this objective must be founded on a clear public benefit attributed to the introduction, enhancement or propagation of a non-native species or a species native to Nevada, but not historically found in Eureka County. Public benefit is demonstrated through affirmation by the Eureka County Wildlife Advisory Board and Eureka County Natural Resources Advisory Commission.; 5) Conduct rangeland studies, pellet group plots, breeding bird transects and other appropriate studies to monitor wildlife relationships to available habitat as well as impacts of vegetation manipulation projects on wildlife; 7) Accelerate the planning, approval and completion of multiple-use water developments, rangeland treatment projects and prescribed burns that include objectives for enhancement of big game and other wildlife habitat. Wildlife developments must be cooperative in nature, respecting the rights and interests of existing resource users; 8) Include considerations of wildlife habitat requirements in the design and reclamation of mineral development projects through approved Plan(s) of Operations.; 9) Assure that management

agencies provide all necessary maintenance of enclosure fences not specifically placed for improved management of livestock."

While the county has adopted policies regarding wildlife resources, it does not have regulatory authority commensurate with the state and federal agencies referenced in this section. However, mitigation that would be consistent with the Eureka County Master Plan has been developed in consultation with the regulatory agencies described in Section 3.23.1 of the EIS. No change has been made to the FEIS in response to this comment.

Item 17

In addition to outlining the language above in the Regulatory Framework, the impacts analyses including framed mitigation must be done in a way to reach consistency with these policies [see Item 16 above] to the maximum extent possible.

Mitigation for impacts to wildlife resources has been included in Section 3.23.3 of the EIS. In regards to objectives outlined in Item 16 above, Objectives 1 and 2 are beyond the scope of the EIS process, but could be conducted at a later date if implementation occurs. While the project is consistent with Objectives 4, 5, and 9, the implementation of such actions is beyond the scope of the proposed action and will not be completed as part of the mining proposal. The Proposed Action is consistent with Objective 7 and several water developments will be provided as mitigation for wildlife and wild horse impacts. The project is consistent with Objective 8. The BLM notes that there is no Objective 6 listed.

Item 18

3.14.3.3.3 Page 3-429: The conclusion reached is incorrect. Eureka County plans and policies often cover private as well as public lands. Because the land use section of the DEIS excludes private lands, it is not possible for BLM to reach the conclusion of no conflicts with land use plans and regulations currently in place to guide development in Eureka County. Previous ADEIS comments from Eureka County as a Cooperating Agency have explained how the project is in conflict with the County's land use plans and regulations. Also, the last sentence refers to land use authorizations and not land use plans and goals. Land use authorizations were addressed in 3.14.3.3.2.

Section 3.14.3.3.3 has been revised to read: "Plans and regulations currently in place to guide development in Eureka County include the following: Eureka County Master Plan (2010); Titles 8 and 9 of the Eureka County Code; and the BLM's RMP (BLM 1986a). The Proposed Action would not conflict with any federal land use plans or regulations. EML's proposed use of public lands under the Proposed Action is reasonably incident under the BLM's occupancy regulations at 43 CFR 3715. Some elements of the Proposed Action would be in conformance with Eureka County plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies. Potential inconsistencies identified by Eureka County are disclosed in Appendix A with a discussion of the efforts to reconcile or the rationale of the decision maker where reconciliation has not been achieved. The Proposed Action would not otherwise impact land use authorizations."

Item 19

Eureka County has formally proposed, approved, budgeted, and is nearly two years in the process of an active planning effort to follow its Master Plan and develop a comprehensive water resource master plan. We believe components of the Proposed Action will result in conflicts with our Water Resources Plan….Further, the range of water management options left available for consideration in the water planning process will be limited by the Project. This Board anticipates policies and requirements in the Water Resources Plan related to monitoring, management, and mitigation that are at odds with measures analyzed, outlined, and committed to in the EIS. It is also anticipated that the Plan will have policies against single entities tying up the majority of the water resources in a basin…To address these possible future conflicts, we request addition of language to the Environmental Consequences section of the EIS to read:

Eureka County is currently involved in development of a comprehensive County water resource master plan. There is a potential that components of the Proposed Action will be in conflict with specific plans and policies of this water resources plan. If these conflicts do occur, BLM will coordinate with Eureka County through the water resources advisory committee, discussed in Section 2.1.15 at page 2-70, to implement mitigation measures to reduce the conflict to the maximum extent practicable."

Although Eureka County may be currently involved in development of a comprehensive County water resource master plan, no draft has been provided for review by the BLM to determine consistency with the Proposed Action. The BLM acknowledges that there is "a potential that components of the Proposed Action will be in conflict with specific plans and policies of this water resources plan" as stated by Eureka County. The water resources advisory committee is intended to focus solely on the Mount Hope Project and "review the monitoring protocols, data and reports. The committee would meet on a periodic basis and make recommendations to the BLM on operational changes or compliance issues." The formation of this committee is not intended to identify, approve, or implement mitigation measures that would reduce any perceived conflicts with a plan that has not yet been written.

APPENDIX B

EUREKA MOLY LLC
TAILINGS SITING EVALUATION

SMITH WILLIAMS CONSULTANTS, INC.

Technical Memorandum

To: Renee Kochler

Project 1029A

From: Ronald Arlian

Date: August 26, 2005

Re: Mount Hope Phase II TSF Alternative Siting Analysis

This memorandum presents the preliminary results of the alternative analysis completed for the Phase II Mount Hope tailings storage facility (TSF) siting study incorporating the changes resulting from the discussions during the August 22/23, 2005 site visit. The intent of this memo is to present potential alternatives for consideration and discussion. Once the study team has a chance to review and comment on the alternatives, Smith Williams will finalize the alternative analysis.

The seven alternatives (Alternative 2a added as a result of the site discussions) under consideration as potential tailings storage sites are presented in Figure 7. Facility-specific layouts are presented in Figures 1 through 6 inclusive and Figure 8. The TSFs as analyzed consists of a small starter embankment constructed of mine waste or borrow which will be expanded by centerline construction methods using cycloned sands as embankment construction materials. In each case, it is assumed that distribution of the tailings will occur from the embankment face thereby resulting in a slimed beach immediately upstream of the embankment and a supernatant pond that will include surface water diversion, access roads, and tailings delivery and solution reclaim systems.

General layouts and physical details of each of the alternatives can be referenced on Figures 1 through 6 and Figure 8. Tables 1 through 7 are facility-specific cost estimates based on the criteria and assumptions presented below:

1. Total required storage capacity will be 925 million tonnes.
2. Tailings slurry solids content will be 35 percent.
3. Solids specific gravity will be 2.53.
4. Sand-to-slimes cyclone split will meet requirements for embankment construction. (Note: Actual required varies with alternative but do not exceed 20 percent of total tailings.)
5. The storage capacity of facilities was evaluated assuming a sand stored density of 1.6 T/m³ and a slimes stored density of 1.3 T/m³.
6. No geotechnical fatal flaws exist.
7. No environmental limitations exist that would completely eliminate any site from use.

8. Facilities will be constructed in phases with a starter embankment and basin with a capacity of one year's tailings storage constructed in Production Year minus 1 and subsequent basin expansions completed starting in Production Year 1 each with a 5-year storage capacity.

9. Embankment construction after the starter embankment will be via cycloned sand, which is assumed to be a continuous operation. (Note: Embankment foundation preparation will be phased with basin expansions.)

10. Minus 200 content of sand is less than 15 percent.

11. Embankment after starter will be constructed of cycloned sands and sand slopes will be stable at 3H:1V

12. Starter embankment will have a 10-meter crest width.

13. Reclaim system consists of a barge-mounted pump with a skid-mounted substation with a pole line for power supply.

14. Seepage collection ponds are double synthetic lined with LCRS.

15. Phreatic surface can be controlled in the sand portion of the embankment with an under drain system and toe drain.

16. Permanent diversion channels around the facility will need to be sized for the probable maximum flood event.

17. Operating costs are rough estimates (power cost is assumed as $0.06 per kilowatt-hour).

18. Mill site is at elevation 2015 meters.

19. Each facility requires the same number of cyclones (6 ea) for tailings distribution and embankment construction.

20. Power pole line will follow the most direct route from the mill site to the skid-mounted substation at the reclaim barge.

21. HDPE pipe will be used for the reclaim and tailings lines for line pressures up to 160 psi (SDR 9) and carbon steel (Schedule Std) will be used where the line pressures exceed 160 psi.

A brief description of each site follows:

Site 1

Site 1 resides adjacent to the preferred mill site and in the general location previously identified as Alternative 1 in the Phase 1 Feasibility Study. The embankment location was selected such that relocation of State Highway 287 would not be required. (Note: The toe of the embankment parallels the highway with a 100-meter offset.) The general layout and specifics of the facility can be seen on Figure 1. The ultimate embankment crest of the facility is at elevation 2015 meters; and based on the latest site access road and waste dump configuration, the ultimate embankment and basin footprint will encroach slightly on these facilities along the TSF's western boundary and to a lesser degree the plant administration area. It has been assumed that the access road fill would be placed in controlled lifts with a fill slope not greater than 2.5H:1V and that the face of the fill would be covered with a geosynthetic liner within the encroachment area. Tailings deposition initially can be by gravity with pumping required in the late production years. The general layout and specifics of the facility can be seen on Figure 1. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 9:

Starter	Total Including Starter	Operating	Reclamation
$24,400,635	$88,483,159	$106,904,120	$48,320,000

Site 1a

Site 1a is similar to the Alternative 2 site for the Phase 1 Feasibility Study. The configuration consists of two facilities (referred to as upper and lower). The upper facility resides in the same location and has the same configuration as in the Phase 1 Study. The lower facility embankment toe has moved to the east in order to accommodate the greater overall tonnes (450 million versus 925 million tonnes); and in fact, the facility footprint is very near the same as Site 1 with the only difference being it is slightly smaller since the required storage capacity is slightly less. The embankment crest elevation is approximately 2002 meters. The ultimate embankment and basin footprint, based on the latest site access road and waste dump configuration, encroaches slightly on these facilities along the TSF's western boundary. It has been assumed that the access road fill would be placed in controlled lifts with a fill slope not greater than 2.5H:1V and that the face of the fill would be covered with a geosynthetic liner within the encroachment area. The lower facility at this site, as with the Site 1 facility, was specifically sited such that the state highway would not have to be relocated, with the embankment toe paralleling the highway with a 100-meter offset. The general layout and specifics of the facility can be seen on Figure 2. Tailings deposition for the upper facility will require pumping. Deposition to the lower facility can initially be by gravity with pumping required in the late production years. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 9:

Starter	Total Including Starter	Operating	Reclamation
$13,104,921	$100,843,346	$101,830,620	$50,680,000

Site 1b

Site 1b is similar to the Exxon Study Alternative A site. The configuration is a single facility and would require the relocation of approximately 11 km of State Highway 278 at the time of construction of the starter facility. The embankment ultimate elevation is approximately 1990 meters and, based on the most recent waste dump/site access road layout, the TSF footprint would encroach slightly on the site access road fill along the TSF's western boundary. It has been assumed that the access road fill would be placed in controlled lifts with a fill slope not greater than 2.5H:1V and that the face of the fill would be covered with a geosynthetic liner within the encroachment area.

The general layout and specifics of the facility can be seen on Figure 5. The tailings deposition for the most part can be by gravity with pumping only required in the last few years. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 9:

Starter	Total Including Starter	Operating	Reclamation
$28,872,371	$96,337,737	$106,677,820	$44,240,000

Site 1c

Site 1c is a combination of the Phase 1 Study Alternative 2 upper facility and the Exxon Study Alternative A site. The configuration consists of two facilities (referred to as upper and lower). The upper facility resides in the same location and has the same configuration as the upper facility for the Phase 1 Study Alternative 2 and also the Site 1a upper facility. The lower facility footprint is basically the same as the Site 1b facility footprint reduced by the storage capacity of the upper facility. The principal difference in this alternative and the Site 1b alternative is that the highway relocation is not required until approximately Production Year 11 (one year before the upper facility is at capacity). The embankment ultimate elevation for the upper facility is 2065 meters and for the lower facility 1975 meters. The general layout and specifics of the facility can be seen on Figure 6. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 9:

Starter	Total Including Starter	Operating	Reclamation
$13,104,921	$117,640,637	$101,544,460	$54,160,000

Site 2

Site 2 is similar to the Exxon Site J alternative and is sited south of the pit across the divide in the Kobeh Valley. The facility is approximately 6 km from the plant site. This site requires that both the tailing slurry and the reclaim water be pumped to the top of the divide (approximate elevation 2050 meters). Presently a high-tension power line passes through the TSF proposed footprint and approximately 7 km of the line would have to be relocated at the time of construction of the starter facility. The ultimate embankment crest is at approximately elevation 2050 meters. The specifics of the facility can be seen on Figure 3. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 9:

Starter	Total Including Starter	Operating	Reclamation
$26,243,402	$90,956,368	$158,862,600	$45,350,000

Site 2a

Site 2a is a combination of two sites The configuration consists of two facilities (referred to as upper and lower). The upper facility resides in the same location and has the same configuration as the upper facility for the Phase 1 Study Alternative 2 and also the Phase II Alternative Sites 1a, and 1c upper facility. The lower facility footprint is similar to the Site 2 facility footprint moved slightly up the slope and reduced by the storage capacity of the upper facility. The lower facility ultimate embankment crest is at approximately elevation 2070 meters. The specifics of the facility can be seen on Figure 8. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 9:

Starter	Total Including Starter	Operating	Reclamation
$13,104,921	$97,031,196	$138,101,400	$43,930,000

Site 3

The Site 3 facility location is the same as the Phase I Study Alternative 3 site basically with the footprint expanded to accommodate the 925 million tonnes. This site is located west of State Highway 278 approximately 6 km from the mill site; and the tailings and reclaim lines and facility access roads will have to cross the highway. For this study, it has been assumed that the tailings line and reclaim line would pass under the highway via a concrete vault and that a geomembrane-lined storage pond would be sited at the east side of the crossing for draining the

lines in case of shutdown and/or to contain solution or tailings in the event of a line break. The ultimate embankment elevation is at 1910 meters. Tailings deposition for the entire life of the facility can be by gravity. The specifics of the facility can be seen on Figure 4. The estimated capital, operating, and reclamation costs are summarized below as well as presented in Table 8:

Starter	Total Including Starter	Operating	Reclamation
$26,006,677	$81,902,915	$116,499,240	$41,015,000

Capital Costs

The detailed estimate of the capital costs for the seven sites are provided on Tables 1 through 8 and summarized on Table 9. The estimated capital costs vary from a low of approximately $88.5 million for Site 1 to approximately $102.5 million for Site 1c. While Site 1c has the highest overall capital cost, it along with Sites 1a and 2a which utilize two facilities have the lowest initial capital cost, which is almost half of the next closest Alternative, Site 1.

Site	Starter	Total Including Starter
1	$24,400,635	$88,483,159
1a	$13,104,921	$100,843,346
1b	$28,872,371	$96,337,737
1c	$13,104,921	$117,640,637
2	$26,243,402	$90,956,368
2a	$13,104,921	$97,031,196
3	$26,006,677	$81,902,915

Operating Costs

The operating unit cost per tonne for each facility was estimated at both the starter and ultimate conditions, which was then assumed to be linear over the life of the mine. (Note: Will overestimate the costs where gravity tailings deposition is used for most of the mine life.) The cost for electric power used for the calculations was $0.06 per kilowatt-hour. Maintenance costs were based on annual costs factored as a percent of the equipment capital cost. A factor of 25 percent of the capital costs was used for the pumps, 25 percent for cyclones and 10 percent of the capital costs for the pipelines and associated accessories. It was assumed that a D-6 dozer would be required to spread and shape the cycloned sands. The dozer was assumed to be working an average of 20 hours per day. The following table summarizes the estimated unit operating cost for each of the facilities at the starter and ultimate condition. The cost is based on 40,000 tonnes per day or 14.6 million tonnes per year.

Facility	Starter ($/T)	Ultimate ($/T)	Total Operating Cost for Facility Life	Total Operating Cost for Site
Site 1	0.112	0.124	$106,904,120	$106,904,120
Site 1a (upper)	0.081	0.104	$17,556,500	$101,830,620
Site 1a (lower)	0.112	0.124	$84,274,120	
Site 1b	0.109	0.127	$106,677,820	$106,677,820
Site 1c (upper)	0.081	0.104	$17,556,500	$101,544,460
Site 1c (lower)	0.108	0.127	$83,987,960	
Site 2	0.162	0.189	$158,862,600	$158,862,600
Site 2a (upper)	0.137	0.108	$17,556,500	$138,101,400
Site 2a (lower)	0.153	0.184	$120,544,900	
Site 3	0.145	0.112	$116,499,240	$116,499,240

The Site 1, 1a, 1c, and 3 facilities are reasonably close with the difference in cost being the result of the difference in pumping head for the reclaim water. Site 2 and 2a have a very high operating cost resulting from the fact that both the tailings and reclaim water require pumping for the life of the facility while for the other facilities the tailings for a certain amount of time is gravity flow. This operating cost could be reduced by cutting a slot 15 to 20 m deep at the divide (present elevation 2050 m) to reduce the pumping head. The cut material could probably be used in the starter embankment construction. This should be considered if either of these two options are viewed as possible final sites in the selection process.

Reclamation Cost

For purposes of this study, closure requirements for the tailings impoundments were viewed to entail the following work:

- Embankment reclamation:
  - Top surface to be regraded to reduce the amount of impoundment leveling required.
  - Surfaces to be stabilized with a 500-mm cap of mine waste.
  - Mine waste cap to be covered with a 300-mm layer of growth medium.
  - Surface area to be revegetated using seed/fertilizer mixture.
  - Spillway/channel to be constructed to convey top area surface water to existing diversion channels.
- Impoundment area:

  - Pond and adjacent beach area to be filled with mine waste to produce positive grades from back to front.
  - Beach area to be stabilized with a 500-mm mine waste cap.
  - Localized shaping to direct surface runoff to embankment spillway/channel.
  - Mine waste cap to be covered with a 300-mm layer of growth medium.
- Underdrainage ponds (Note: Ponds will remain until seepage reduces to a level that can be handled via a method such as evapotranspiration.):
  - Pumps and sump to be removed.
  - Synthetic liners to be cut at anchor trench but not removed.
  - Pond to be backfilled with alluvium.
  - Surface area to be covered with growth medium and revegetated by use of a seed/fertilizer mixture.
- Perimeter roads:
  - Roads to be contoured into adjacent surfaces to remove abrupt slope changes.
  - Surface area to be covered with a 300-mm layer of growth medium and revegetated using seed/fertilizer mixture.
- Borrow areas:
  - Surface areas to be contoured to provide reasonably smooth contours and shaped to drain.
  - Surface area to be covered with a 300-mm layer of growth medium and seeded.

The estimated unit rates used in estimating the reclamation costs are summarized in the table below:

Estimated Closure Costs

Description	Unit Rate US$/hectare
Embankment	$15,000
Spillway/Channels	$500,000
Impoundment	$30,000
Underdrainage Ponds	$25,000
Perimeter Roads	$20,000

Borrow Areas	$5,000
Tailings Conveyance Line	Note 1
Reclaim Water Line	Note 1
Monitoring	$25,000/yr

Using the parameters above, the reclamation costs by facility are summarized below:

Facility	Cost per Facility	Total Cost
Site 1	$48,320,000	$48,320,000
Site 1a (upper)	$9,920,000	$50,680,000
Site 1a (lower)	$40,760,000	
Site 1b	$44,240,00	$44,240,000
Site 1c (upper)	$9,920,000	$54,160,000
Site 1c (lower)	$44,240,000	
Site 2	$45,350,000	$45,350,000
Site 2a (upper)	$9,920,000	$43,930,000
Site 2a (lower)	$34,010,000	
Site 3	$41,015,000	$41,015,000

NPV

Using the capital, operating, and reclamation costs, the NPV for each of the sites was determined using a rate of 7 percent. The capital costs were distributed using the following assumptions:

1. Starter facility will be sized for one year's production.
2. Year 2 relates to Production Year 1 (i.e., starter capital assumed to be all spent in the year before production starts).
3. Production starts on January 1.
4. First expansion will be completed in Production Year 1 and sized for 5 years' production and expansions will then completed each 5 years.
5. Capital cost for each expansion will be equal and has been distributed equally over the mine life.
6. Change in operating cost from starter to ultimate will be linear.
7. For sites with two facilities, reclamation will start on the first facility one year after the facility reaches capacity.
8. Reclamation for each facility will be spread over two years.

Using these assumptions, the NPV for the sites is summarized below with more detail shown on Table 10:

Alternative	NPV (7%)
Site 1	$60,229,497
Site 1a	$60,232,833
Site 1b	$64,844,895
Site 1c	$63,391,717
Site 2	$72,376,523
Site 2a	$63,216,101
Site 3	$64,288,627

Decision Matrix

A decision matrix has been prepared to rate the alternatives, taking into consideration various aspects including the following:

- NPV (20%)
- Initial capital cost (25%)
- Operating cost (15%)
- Permitting time/difficulty (15%)
- Land position (10%)
- Environmental considerations (7.5%)
- Technical considerations(7.5%)

The weighted percentages for each criterion were established during the discussions held at site August 23, 2005 and vary some from the criterion used for the Phase I Study.

Based on the criteria selected, the TSF sites were then given a rating using the following approach:

- The NPV, initial capital, and operating scores for each site were determined by assigning values between 1 and 7 to the alternative, based on a linear interpolation of the relationship between the lowest cost alternative (1) and the highest cost alternative (7).

- For the non-economic consideration, a value from 1 to 7 (1 = most favorable; 7 = least favorable) was assigned to each criterion for each alternative site. Values were assigned based primarily on comparisons between each of the facilities with the approach that, for criteria where there is no significant difference between sites, the scores will not be spread from 1 to 7 for the sites but will be evaluated upon comparison with ideal or extremely poor sites, with 1 being ideal and 7 being extremely poor.

- The items considered under environmental impact included the following:

  - Visual impact
  - Impacted cultural resources
  - Fugitive dust potential (air quality)
  - Ground water
  - Surface water
  - Vegetation
- The items considered under Technical Considerations included:
  - Embankment sand volume requirements
  - Surface water hydrology (upstream watershed/diversions)
  - Presumed depth to ground water
  - Topography
  - Location with respect to the mill
  - Operating ease
  - Geotechnical risk
  - Impacts on preferred waste dumps/administration area and existing facilities.

Tables 11 and 12 show the scores assigned for the sub-items under Technical and Environmental Consideration. The sub-items were scored independently by R. Arlian and D. Wittwer and those scores then averaged for the final score.

Permitting Time/Difficulty has not been scored pending discussions/input from Val Sawyer of SRK.

Based on the criteria and weighing as discussed above, Site 1a would show for this preliminary analysis to be the best overall site with Site 1b being the least desirable site with the order being Site 1a, 2a 1c, 1, 3, 2 and 1b. The three sites with the two facilities have the best overall scores. Of these three sites, Site 2a shows to be the best technically and environmentally while site 1a scored slightly better financially.

TABLE 1
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 1

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.65	3050	$50,773	0	$0	3,050	$50,773
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	729,316	$87,518	0	$0	729,316	$87,518
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	7,673,800	$920,856	1,700,924	$204,111	9,374,724	$1,124,967
1.4	Mine Waste to TSF	m^3	$0.00	2,516,000	$0	557,680	$0	3,073,680	$0
				Sub-Total	**$1,059,147**		**$204,111**		**$1,263,258**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilization**								
2.1	Mobilization		5%	$16,427,674	$821,384	$51,146,648	$2,557,332	67,574,322	$3,378,716
2.2	Demobilization		2%	$16,427,674	$328,553	$49,971,648	$999,433	66,399,322	$1,327,986
				Sub-Total	**$1,149,937**		**$3,556,765**		**$4,706,703**
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.11	1,524,661	$167,713	12,972,865	$1,427,015	14,497,526	$1,594,728
3.2	Topsoil Stripping	m^2	$0.50	1,524,661	$762,331	12,972,865	$6,486,433	14,497,526	$7,248,763
3.3	Embankment Foundation Excavation	m^3	$1.65	270,504	$446,331	862,383	$1,422,932	1,132,887	$1,869,263
3.4	Embankment Foundation Preparation	m^2	$0.28	541,007	$151,482	1,724,766	$482,934	2,265,773	$634,416
3.5	Embankment Foundation Subgrade	m^2	$1.10	541,007	$595,108	1,724,766	$1,897,243	2,265,773	$2,492,350
3.6	Embankment Foundation Finger Drains	m	$21.89	18,034	$394,755	57,492	$1,258,504	75,526	$1,653,259
3.8	Embankment Spine drain	m	$86.74	200	$17,348	330	$28,624	530	$45,972
3.7	Embankment Toe Drain	m^3	$2.20	0	$0	557,680	$1,226,896	557,680	$1,226,896
3.9	Embankment Construction	m^3	$0.39	2,836,000	$1,106,040	0	$0	2,836,000	$1,106,040
3.10	Embankment Face Shaping	m^2	$0.28	204,403	$57,233			204,403	$57,233
3.11	Basin Foundation Preparation	m^2	$0.28	983,654	$275,423	11,248,099	$3,149,468	12,231,753	$3,424,891
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	983,654	$1,082,019	11,248,099	$12,372,909	12,231,753	$13,454,928
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	983,654	$1,082,019	11,248,099	$12,372,909	12,231,753	$13,454,928
3.14	Basin Reclaim Slot Excavation	m^3	$1.49	392,800	$585,272	1,570,400	$2,339,896	1,963,200	$2,925,168
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	54,796	$60,275	219,071	$240,978	273,866	$301,253
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	109,591	$151,236	438,141	$604,635	547,732	$755,870
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	54,796	$27,398	219,071	$109,535	273,866	$136,933
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	19,673	$119,022	224,962	$1,361,020	244,635	$1,480,042
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	1,967	$54,967	22,496	$628,544	24,464	$683,510
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	1,491	$60,415	5,889	$238,622	7,380	$299,038
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm SDR 17)	m	$550.00	530	$291,500		$0	530	$291,500
				Sub-Total	**$7,487,886**		**$47,649,096**		**$55,136,982**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.11	30,000	$3,300	0	$0	30,000	$3,300
4.2	Topsoil Stripping	m^2	$0.76	30,000	$22,800	0	$0	30,000	$22,800
4.3	Excavation to Fill/Waste	m^3	$3.30	111,000	$366,300	0	$0	111,000	$366,300
4.4	Prepared Subgrade	m^2	$1.65	30,900	$50,985	0	$0	30,900	$50,985
4.5	Geomembrane Liner	m^2	$5.76	61,800	$355,968	0	$0	61,800	$355,968
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	0	$0	1	$50,000
				Sub-Total	**$849,353**		**$0**		$849,353
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	0	$0	0	$0		$0
5.2	Major Temporary Channels	m	$87.00	6,628	$576,636	26,696	$2,322,552	33,324	$2,899,188
5.3	Minor Permanent Channels	m	$150.00	0	$0	0	$0	0	$0
5.4	Major Permanent Channels	m	$275.00	19,959	$5,488,725	0	$0	19,959	$5,488,725
				Sub-Total	**$6,065,361**		**$2,322,552**		$8,387,913
6.0	**Tailing Delivery Line**								
6.1	Delivery Line	ls	$2,403,610.00	1	$2,403,610	1	$1,500,000	2	$3,903,610
6.2	Adjacent Road and Trench	m	$70.00	1,025	$71,750			1,025	$71,750
6.3	Valves and Fittings	ls	$240,361.00	1	$240,361		$150,000	1	$390,361
				Sub-Total	**$2,715,721**		**$1,650,000**		$4,365,721
7.0	**Reclaim Line**								
7.1	Reclaim Line	ls	$1,334,428.00	1	$1,334,428	1	$700,000	2	$2,034,428
7.2	Sump at Mill	ls	$30,000.00	0	$0		$0		$0
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	2.5	$250,000		$0	2.5	$250,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000		$0	1	$100,000
				Sub-Total	**$1,934,428**		**$700,000**		**$2,634,428**
				Grand Total	**$21,261,833**		**$56,082,524**		**$77,344,357**
8.0	**EPCM**								
8.1	EPCM	ls	11%	21,261,833	$2,338,802	1	$8,000,000	21,261,834	$10,338,802
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,138,802**		**$8,000,000**		**$11,138,802**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$24,400,635**		**$64,082,524**		**$88,483,159**

TABLE 2
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 1a, 1c and 2a (Upper)

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.58	2000	$33,168	0	$0	2000	$33,168
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	313,600	$37,632	0	$0	313600	$37,632
1.3	Extra Haul Over Waste Dump for Embankment	m^3/km	$0.12	3,728,200	$447,384	229,000	$27,480	3957200	$474,864
1.4	Mine Waste to TSF	m^3	$0.00	1864100	$0	114500	$0	1978600	$0
				Sub-Total	**$518,184**		**$27,480**		**$545,664**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilizatior**								
2.1	Mobilization		5%	$8,647,037	$432,352	$12,281,256	$614,063	$20,928,293	$1,046,415
2.2	Demobilization		2%	$8,647,037	$172,941	$12,281,256	$245,625	$20,928,293	$418,566
				Sub-Total	**$605,293**		**$859,688**		**$1,464,981**
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.19	636,000	$117,660	2,696,471	$498,847	3,332,471	$616,507
3.2	Topsoil Stripping	m^2	$0.50	636,000	$318,000	2,696,471	$1,348,236	3,332,471	$1,666,236
3.3	Embankment Foundation Excavation	m^3	$1.65	82,885	$136,760	189,465	$312,617	272,350	$449,378
3.4	Embankment Foundation Preparation	m^2	$0.28	165,770	$46,416	378,930	$106,100	544,700	$152,516
3.5	Embankment Foundation Subgrade	m^2	$1.10	165,770	$182,347	378,930	$416,823	544,700	$599,170
3.6	Embankment Foundation Finger Drains	m	$21.89	6,631	$145,153	12,631	$276,493	19,262	$421,645
3.7	Embankment Spine drain	m	$86.74	1,400	$121,436	1,200	$104,088	2,600	$225,524
3.8	Embankment Toe Drain	m^3	$2.20	0	$0	114,500	$251,900	114,500	$251,900
3.9	Embankment Construction	m^3	$0.39	2,590,100	$1,010,139	0	$0	2,590,100	$1,010,139
3.10	Embankment Face Shaping	m^2	$0.28	182,347	$51,057	0	$0	182,347	$51,057
3.11	Basin Foundation Preparation	m^2	$0.28	549,000	$153,720	2,239,800	$627,144	2,788,800	$780,864
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	549,000	$603,900	2,239,800	$2,463,780	2,788,800	$3,067,680
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	549,000	$603,900	2,239,800	$2,463,780	2,788,800	$3,067,680
3.14	Basin Reclaim Slot Excavation	m^3	$1.49	726,000	$1,081,740	755,400	$1,125,546	1,481,400	$2,207,286
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	180,000	$198,000	328,492	$361,341	508,492	$559,341
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	180,000	$248,400	200,000	$276,000	380,000	$524,400
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	180,000	$90,000	328,492	$164,246	508,492	$254,246
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	14,580	$88,209	98,783	$597,637	113,363	$685,846
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	1,694	$47,330	3,576	$99,913	5,270	$147,244
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	1,997	$80,918	1,623	$65,764	3,620	$146,682
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm S	m	$550.00	500	$275,000	0	$0	500	$275,000
				Sub-Total	**$5,600,085**		**$11,560,256**		$17,160,341
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.19	2,500	$463	0	$0	2,500	$463
4.2	Topsoil Stripping	m^2	$0.76	2,500	$1,900	0	$0	2,500	$1,900
4.3	Excavation to Fill/Waste	m^3	$3.30	19,500	$64,350	0	$0	19,500	$64,350
4.4	Prepared Subgrade	m^2	$1.65	2,615	$4,315	0	$0	2,615	$4,315
4.5	Geomembrane Liner with Geonet	m^2	$5.76	5,230	$30,125	0	$0	5,230	$30,125
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	0	$0	1	$50,000
				Sub-Total	**$151,152**		**$0**	0	$151,152
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	3200	$60,800	14000	$266,000	17,200	$326,800
5.2	Major Temporary Channels	m	$87.00	0	$0	0	$0	0	$0
5.3	Minor Permanent Channels	m	$150.00	6000	$900,000	0	$0	6,000	$900,000
5.4	Major Permanent Channels	m	$275.00	4000	$1,100,000	0	$0	4,000	$1,100,000
				Sub-Total	**$2,060,800**		**$266,000**	0	$2,326,800
6.0	**Tailing Delivery Line**								
6.1	Tailing Distribution System	ls	$900,000.00	1	$900,000	1	$810,000	2	$1,710,000
				Sub-Total	**$900,000**		**$810,000**		**$1,710,000**
7.0	**Reclaim Line**								
7.1	Reclaim Line	ls	$770,000.00	1	$770,000	1	$100,000	2	$870,000
7.2	Sump Mill	ls	$30,000.00	1	$30,000	0	$0	1	$30,000
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	1.0	$100,000		$0	1	$100,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000	0	$0	1	$100,000
				Sub-Total	$1,250,000		$100,000		$1,350,000
				Grand Total	**$11,085,514**		**$13,623,424**		**$24,708,938**
8.0	**EPCM**								
8.1	EPCM	ls	11%	13,623,424	$1,219,407	1	$1,498,577	13,623,425	$2,717,983
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$2,019,407**		**$1,498,577**		**$3,517,983**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$13,104,921**		**$15,122,000**		**$28,226,921**

TABLE 3
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 1a (lower)

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction of Temporary Haul Road	m	$16.76	5,000	$83,820	0	$0	5,000	$83,820
1.2	Extra Haul Over Waste Dump to Construct Temp Haul Road	m^3/km	$0.12	1,960,000	$235,200	0	$0	1,960,000	$235,200
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	12,216,000	$1,465,920	2,788,400	$334,608	15,004,400	$1,800,528
1.4	Place and Compact Mine Waste	m^3	$0.00	2,443,200	$0	557,680	$0	3,000,880	$0
				Sub-Total	**$1,784,940**		**$334,608**	0	**$2,119,548**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.1	Mobilization	ls	5%	$15,169,569	$758,478	$38,958,799	$1,947,940	54,128,368	$2,706,418
2.2	Demobilization	ls	2%	$15,169,569	$303,391	$38,958,799	$779,176	54,128,368	$1,082,567
				Sub-Total	**$1,061,870**		**$2,727,116**		**$3,788,986**
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.11	1,524,661	$167,713	9,631,200	$1,059,432	11,155,861	$1,227,145
3.2	Topsoil Stripping	m^2	$0.50	1,524,661	$762,331	9,631,200	$4,815,600	11,155,861	$5,577,931
3.3	Embankment Foundation Excavation	m^3	$1.65	270,504	$446,331	834,600	$1,377,090	1,105,104	$1,823,421
3.4	Embankment Foundation Preparation	m^2	$0.28	541,007	$151,482	1,669,200	$467,376	2,210,207	$618,858
3.5	Embankment Foundation Subgrade	m^2	$1.10	541,007	$595,108	1,669,200	$1,836,120	2,210,207	$2,431,228
3.6	Embankment Foundation Finger Drains	m	$21.89	18,034	$394,755	55,640	$1,217,960	73,674	$1,612,714
3.8	Embankment Spine drain	m	$86.74	200	$17,348	450	$39,033	650	$56,381
3.7	Embankment Toe Drain	m^3	$2.20	0	$0	557,680	$1,226,896	557,680	$1,226,896
3.9	Embankment Construction	m^3	$0.39	2,836,000	$1,106,040	0	$0	2,836,000	$1,106,040
3.10	Embankment Face Shaping	m^2	$0.28	204,403	$57,233			204,403	$57,233
3.11	Basin Foundation Preparation	m^2	$0.28	983,654	$275,423	7,962,000	$2,229,360	8,945,654	$2,504,783
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	983,654	$1,082,019	7,962,000	$8,758,200	8,945,654	$9,840,219
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	983,654	$1,082,019	7,962,000	$8,758,200	8,945,654	$9,840,219
3.14	Basin Reclaim Slot Excavation	m^3	$1.49	392,800	$585,272	1,570,400	$2,339,896	1,963,200	$2,925,168
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	54,796	$60,275	219,071	$240,978	273,867	$301,253
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	109,591	$151,236	438,141	$604,635	547,732	$755,870
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	54,796	$27,398	219,071	$109,536	273,867	$136,933
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	19,673	$119,022	159,240	$963,402	178,913	$1,082,424
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	1,967	$54,967	15,924	$444,917	17,891	$499,883
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	1,491	$60,415	5,889	$238,622	7,380	$299,038
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm SDR 1	m	$550.00	530	$291,500		$0	530	$291,500
				Sub-Total	**$7,487,886**		**$36,727,252**		**$44,215,137**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.11	30,000	$3,300	0	$0	30,000	$3,300
4.2	Topsoil Stripping	m^2	$0.76	30,000	$22,800	0	$0	30,000	$22,800
4.3	Excavation to Fill/Waste	m^3	$3.30	111,000	$366,300	0	$0	111,000	$366,300
4.4	Prepared Subgrade	m^2	$1.65	30,900	$50,985	0	$0	30,900	$50,985
4.5	Geomembrane Liner and Geonet	m^2	$5.76	61,800	$355,968	0	$0	61,800	$355,968
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	0	$0	1	$50,000
				Sub-Total	**$849,353**		**$0**		**$849,353**
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	0		0	$0	0	$0
5.2	Major Temporary Channels (Without Riprap Protection)	m	$87.00	6,628	$576,636	13,581	$1,181,547	20,209	$1,758,183
5.3	Minor Permanent Channels	m	$150.00	0		0	$0	0	$0
5.4	Major Permanent Channels (With Riprap Protection)	m	$275.00	14,297	$3,931,675	0	$0	14,297	$3,931,675
				Sub-Total	**$4,508,311**		**$1,181,547**		**$5,689,858**
6.0	**Tailing Delivery Line**								
6.1	Tailing Distribution System	ls	$2,726,010.00	1	$2,726,010	1	$1,500,000	2	$4,226,010
6.2	Adjacent Road and Trench	m	$70.00	4,500	$315,000			4,500	$315,000
6.3	Valves and Fittings	ls	$272,601.00	1	$272,601	1	$150,000	2	$422,601
				Sub-Total	**$3,313,611**		**$1,500,000**		**$4,813,611**
7.0	**Reclaim Line**								
7.1	Reclaim System	ls	$1,334,428.00	1	$1,334,428	1	$600,000	2	$1,934,428
7.2	Sump at Mill	ls	$30,000.00	0	$0			0	$0
7.3	Barge Costs	ls	$250,000.00	1	$250,000	1	$250,000	2	$500,000
7.4	Power Costs	km	$100,000.00	2.5	$250,000		$0	3	$250,000
7.5	Power Equipment	ls	$100,000.00	1.0	$100,000	2	$200,000	3	$300,000
				Sub-total	**$1,934,428**		**$1,050,000**		**$2,984,428**
				Total	**$20,940,398**		**$41,572,583**		**$62,512,981**
8.0	**EPCM**								
8.1	EPCM	ls	11%	20,940,398	$2,303,444	1	$7,000,000	20,940,399	$9,303,444
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,103,444**		**$7,000,000**		**$10,103,444**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$24,043,842**		**$48,572,583**		**$72,616,425**

TABLE 4
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 1b (lower)

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.46	0	$0	0	$0	0	$0
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Place and Compact Mine Waste	m^3	$0.00	0	$0	0	$0	0	$0
				Sub-Total	**$0**		**$0**	0	**$0**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilizatior**								
2.1	Mobilization		5%	$13,807,686	$690,384	$52,211,609	$2,610,580	66,019,295	$3,300,965
2.2	Demobilization		2%	$13,807,686	$276,154	$52,211,609	$1,044,232	66,019,295	$1,320,386
				Sub-Total	**$966,538**		**$3,654,813**	0	$4,621,351
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.11	1,008,300	$110,913	13,710,400	$1,508,144	14,718,700	$1,619,057
3.2	Topsoil Stripping	m^2	$0.50	1,008,300	$504,150	13,710,400	$6,855,200	14,718,700	$7,359,350
3.3	Embankment Foundation Excavation	m^3	$1.65	44,000	$72,600	403,050	$665,033	447,050	$737,633
3.4	Embankment Foundation Preparation	m^2	$0.28	88,000	$24,640	806,100	$225,708	894,100	$250,348
3.5	Embankment Prepared Subgrade	m^2	$1.10	88,000	$96,800	806,100	$886,710	894,100	$983,510
3.6	Embankment Foundation Finger Drains	m	$21.89	2,933	$64,211	26,870	$588,184	29,803	$652,395
3.7	Embankment Spine drain	m	$86.74	200	$17,348	470	$40,768	670	$58,116
3.8	Embankment Toe Drain	m^3	$2.20	0	$0	284,130	$625,086	284,130	$625,086
3.9	Embankment Construction (10 m wide crest)	m^3	$0.39	1,057,596	$412,462	0	$0	1,057,596	$412,462
3.10	Emankment Face Shaping	m^2	$0.28	37,000	$10,360			37,000	$10,360
3.11	Basin Foundation Preparation	m^2	$0.28	920,300	$257,684	12,904,300	$3,613,204	13,824,600	$3,870,888
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	920,300	$1,012,330	12,904,300	$14,194,730	13,824,600	$15,207,060
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	920,300	$1,012,330	12,904,300	$14,194,730	13,824,600	$15,207,060
3.14	Basin Reclaim Slot Excavation	m^3	$1.49	1,040,000	$1,549,600	2,320,000	$3,456,800	3,360,000	$5,006,400
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	143,000	$157,300	319,000	$350,900	462,000	$508,200
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	286,000	$394,680	638,000	$880,440	924,000	$1,275,120
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	143,000	$71,500	319,000	$159,500	462,000	$231,000
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	21,278	$128,732	264,466	$1,600,019	285,744	$1,728,751
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	2,128	$59,451	26,447	$738,929	28,575	$798,380
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	3,900	$158,028	8,700	$352,524	12,600	$510,552
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm S	m	$550.00	670	$368,500		$0	670	$368,500
3.22	Highway Relocation	km	$500,000.00	11	$5,250,000		$0	11	$5,250,000
				Sub-Total	**$11,733,619**		**$50,936,609**		**$62,670,228**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.11	30,000	$3,300	0	$0	30,000	$3,300
4.2	Topsoil Stripping	m^2	$0.76	30,000	$22,800	0	$0	30,000	$22,800
4.3	Excavation to Fill/Waste	m^3	$3.30	111,000	$366,300	0	$0	111,000	$366,300
4.4	Prepared Subgrade	m^2	$1.65	30,900	$50,985	0	$0	30,900	$50,985
4.5	Geomembrane Liner and Geonet	m^2	$5.76	61,800	$355,968	0	$0	61,800	$355,968
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	0	$0	1	$50,000
				Sub-Total	**$849,353**		**$0**		**$849,353**
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	0	$0	0	$0	0	$0
5.2	Major Temporary Channels	m	$87.00	6,513	$566,631	26,712	$2,323,944	33,225	$2,890,575
5.3	Minor Permanent Channels	m	$150.00	0	$0	0	$0	0	$0
5.4	Major Permanent Channels	m	$275.00	22,786	$6,266,150	0	$0	22,786	$6,266,150
				Sub-Total	**$6,832,781**		**$2,323,944**		**$9,156,725**
6.0	**Tailing Delivery Line**								
6.1	Delivery Line With Adjacent Access Road	ls	$2,112,460.00	1	$2,112,460	1	$1,850,000	2	$3,962,460
6.2	Adjacent Road and Trench	m	$70.00	7,000	$490,000			7,000	$490,000
6.3	Valves and Fittings	ls	$211,246.00	1	$211,246	1	$185,000	2	$396,246
				Sub-Total	**$2,813,706**		**$1,850,000**		**$4,663,706**
7.0	**Reclaim System**								
7.1	Reclaim System	ls	$1,334,428.00	1	$1,334,428	1	$700,000	2	$2,034,428
7.2	Sump at Mill	ls	$30,000.00	0	$0			0	$0
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	4.1	$410,000		$0	4	$410,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000	0	$0	1	$100,000
				Sub-Total	$2,094,428		$700,000		$2,794,428
				Grand Total	**$25,290,425**		**$59,465,366**		**$84,755,790**
8.0	**EPCM**							0	$0
8.1	EPCM	ls	11%	25,290,425	$2,781,947	1	$8,000,000	25,290,426	$10,781,947
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,581,947**		**$8,000,000**		$11,581,947
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$28,872,371**		**$67,465,366**		**$96,337,737**

TABLE 5
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No.1c (Lower)

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.46	0	$0	0	$0	0	$0
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Place and Compact Mine Waste	m^3	$0.00	0	$0	0	$0	0	$0
				Sub-Total	**$0**		**$0**		**$0**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilization**								
2.1	Mobilization		5%	$13,807,686	$690,384	$46,721,870	$2,336,093	60,529,556	$3,026,478
2.2	Demobilization		2%	$13,807,686	$276,154	$46,721,870	$934,437	60,529,556	$1,210,591
				Sub-Total	**$966,538**		**$3,270,531**		$4,237,069
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.11	1,008,300	$110,913	11,243,453	$1,236,780	12,251,753	$1,347,693
3.2	Topsoil Stripping	m^2	$0.50	1,008,300	$504,150	11,243,453	$5,621,727	12,251,753	$6,125,877
3.3	Embankment Foundation Excavation	m^3	$1.65	44,000	$72,600	293,941	$485,002	337,941	$557,602
3.4	Embankment Foundation Preparation	m^2	$0.28	88,000	$24,640	587,881	$164,607	675,881	$189,247
3.5	Embankment Prepared Subgrade	m^2	$1.10	88,000	$96,800	587,881	$646,669	675,881	$743,469
3.6	Embankment Foundation Finger Drains	m	$21.89	2,933	$64,211	19,596	$428,957	22,529	$493,168
3.7	Embankment Spine drain	m	$86.74	200	$17,348	470	$40,768	670	$58,116
3.8	Embankment Toe Drain	m^3	$2.20	0	$0	284,130	$625,086	284,130	$625,086
3.9	Embankment Construction (10 m wide crest)	m^3	$0.39	1,057,596	$412,462	0	$0	1,057,596	$412,462
3.10	Emankment Face Shaping	m^2	$0.28	37,000	$10,360			37,000	$10,360
3.11	Basin Foundation Preparation	m^2	$0.28	920,300	$257,684	11,575,872	$3,241,244	12,496,172	$3,498,928
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	920,300	$1,012,330	11,575,872	$12,733,459	12,496,172	$13,745,789
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	920,300	$1,012,330	11,575,872	$12,733,459	12,496,172	$13,745,789
3.14	Basin Reclaim Slot Excavation	m^3	$1.49	1,040,000	$1,549,600	2,320,000	$3,456,800	3,360,000	$5,006,400
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	143,000	$157,300	319,000	$350,900	462,000	$508,200
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	286,000	$394,680	638,000	$880,440	924,000	$1,275,120
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	143,000	$71,500	319,000	$159,500	462,000	$231,000
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	21,278	$128,732	264,466	$1,600,019	285,744	$1,728,751
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	2,128	$59,451	26,447	$738,929	28,575	$798,380
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	3,900	$158,028	8,700	$352,524	12,600	$510,552
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm SDR 17)	m	$550.00	670	$368,500		$0	670	$368,500
3.22	Highway Relocation	km	$500,000.00	11	$5,250,000		$0	11	$5,250,000
				Sub-Total	**$11,733,619**		**$45,496,870**		**$57,230,489**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.11	30,000	$3,300	0	$0	30,000	$3,300
4.2	Topsoil Stripping	m^2	$0.76	30,000	$22,800	0	$0	30,000	$22,800
4.3	Excavation to Fill/Waste	m^3	$3.30	111,000	$366,300	0	$0	111,000	$366,300
4.4	Prepared Subgrade	m^2	$1.65	30,900	$50,985	0	$0	30,900	$50,985
4.5	Geomembrane Liner and Geonet	m^2	$5.76	61,800	$355,968	0	$0	61,800	$355,968
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	0	$0	1	$50,000
				Sub-Total	**$849,353**		**$0**		**$849,353**
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	0	$0	0	$0	0	$0
5.2	Major Temporary Channels	m	$87.00	6,513	$566,631	26,712	$2,323,944	33,225	$2,890,575
5.3	Minor Permanent Channels	m	$150.00	0	$0	0	$0	0	$0
5.4	Major Permanent Channels	m	$275.00	22,786	$6,266,150	0	$0	22,786	$6,266,150
				Sub-Total	**$6,832,781**		**$2,323,944**		**$9,156,725**
6.0	**Tailing Delivery Line**								
6.1	Delivery Line With Adjacent Access Road	ls	$2,112,460.00	1	$2,112,460	1	$1,750,000	2	$3,862,460
6.2	Adjacent Road and Trench	m	$70.00	7,000	$490,000			7,000	$490,000
6.3	Valves and Fittings	ls	$211,246.00	1	$211,246	1	$175,000	2	$386,246
				Sub-Total	**$2,813,706**		**$1,750,000**		**$4,563,706**
7.0	**Reclaim System**								
7.1	Reclaim System	ls	$1,334,428.00	1	$1,334,428	1	$700,000	2	$2,034,428
7.2	Sump at Mill	ls	$30,000.00	0	$0			0	$0
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	4.1	$410,000		$0	4	$410,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000	0	$0	1	$100,000
				Sub-Total	**$2,094,428**		**$700,000**		**$2,794,428**
				Grand Total	**$25,290,425**		**$53,541,345**		**$78,831,770**
8.0	**EPCM**								
8.1	EPCM	ls	11%	25,290,425	$2,781,947	1	$7,000,000	25,290,426	$9,781,947
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,581,947**		**$7,000,000**		**$10,581,947**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$28,872,371**		**$60,541,345**		**$89,413,716**

TABLE 6
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 2

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.46	0	$0	0	$0	0	$0
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Place and Compact Mine Waste	m^3	$0.21	0	$0	0	$0	0	$0
				Sub-Total	**$0**		**$0**		**$0**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilization**								
2.1	Mobilization		5%	$14,152,717	$707,636	$52,185,015	$2,609,251	66,337,732	$3,316,887
2.2	Demobilization		2%	$14,152,717	$283,054	$52,185,015	$1,043,700	66,337,732	$1,326,755
				Sub-Total	**$990,690**		**$3,652,951**		**$4,643,641**
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.19	1,792,980	$331,701	13,939,438	$2,578,796	15,732,418	$2,910,497
3.2	Topsoil Stripping	m^2	$0.50	1,792,980	$896,490	13,939,438	$6,969,719	15,732,418	$7,866,209
3.3	Embankment Foundation Excavation	m^3	$1.65	154,231	$254,480	995,430	$1,642,459	1,149,660	$1,896,939
3.4	Embankment Foundation Preparation	m^2	$0.28	308,461	$86,369	1,990,859	$557,441	2,299,320	$643,810
3.5	Embankment Prepared Subgrade	m^2	$1.10	308,461	$339,307			308,461	$339,307
3.6	Embankment Foundation Finger Drains	m	$21.89	10,282	$225,074	66,362	$1,452,663	76,644	$1,677,737
3.7	Embankment Spine drain	m	$86.74	100	$8,674	300	$26,022	400	$34,696
3.8	Embankment Toe Drain	m^3	$2.20	0	$0	841,355	$1,850,981	841,355	$1,850,981
3.9	Embankment Construction (10 m wide crest)	m^3	$0.39	2,202,284	$858,891	0	$0	2,202,284	$858,891
3.10	Embankment Face Shaping	m^2	$0.28	655,355	$183,499			655,355	$183,499
3.11	Basin Foundation Preparation	m^2	$0.28	1,425,419	$399,117	11,948,600	$3,345,608	13,374,019	$3,744,725
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	1,425,419	$1,567,961	11,948,600	$13,143,460	13,374,019	$14,711,421
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	1,425,419	$1,567,961	11,948,600	$13,143,460	13,374,019	$14,711,421
3.14	Basin Recalim Slot Excavation	m^3	$1.49	648,000	$965,520	1,993,600	$2,970,464	2,641,600	$3,935,984
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	90,396	$99,436	278,107	$305,918	368,503	$405,353
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	180,792	$249,493	556,214	$767,575	737,006	$1,017,068
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	90,396	$45,198	278,107	$139,054	368,503	$184,252
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	28,508	$172,476	238,972	$1,445,781	267,480	$1,618,256
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	2,851	$79,652	23,897	$667,688	26,748	$747,340
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	2,430	$98,464	7,476	$302,928	9,906	$401,391
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm SDR 17)	m	$550.00	400	$220,000	0	$0	400	$220,000
3.23	Relocation of Powerlines	km	$250,000.00	11.5	$2,875,000	0	$0	12	$2,875,000
				Sub-Total	**$11,524,763**		**$51,310,015**		**$62,834,778**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.19	30,000	$5,550	0	$0	30,000	$5,550
4.2	Topsoil Stripping	m^2	$0.76	30,000	$22,800	0	$0	30,000	$22,800
4.3	Excavation to Fill/Waste	m^3	$3.30	111,000	$366,300	0	$0	111,000	$366,300
4.4	Prepared Subgrade	m^2	$1.65	30,900	$50,985	0	$0	30,900	$50,985
4.5	Geomembrane Liner and Geonet	m^2	$5.76	61,800	$355,968	0	$0	61,800	$355,968
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	0	$0	1	$50,000
				Sub-Total	**$851,603**		**$0**		**$851,603**
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	0	$0	0	$0	0	$0
5.2	Major Temporary Channels	m	$87.00	4,960	$431,520	22,032	$1,916,784	26,992	$2,348,304
5.3	Minor Permanent Channels	m	$150.00	18,050	$2,707,500	0	$0	18,050	$2,707,500
5.4	Major Permanent Channels	m	$275.00		$0	0	$0	0	$0
				Sub-Total	**$3,139,020**				**$3,139,020**
6.0	**Tailing Delivery Line**								
6.1	Delivery Line With Adjacent Access Road	ls	$3,255,150.00	1	$3,255,150	1	$1,050,000	2	$4,305,150
6.2	Adjacent Access Road and Trench	m	$70.00	5,400	$378,000			5,400	$378,000
6.3	Valves and Fittings	ls	$162,757.50	1	$162,758	1	$105,000	2	$267,758
				Sub-Total	**$3,795,908**		**$1,050,000**		**$4,845,908**
7.0	**Reclaim Line**								
7.1	Reclaim Line	ls	$1,460,000.00	1	$1,460,000	1	$700,000	2	$2,160,000
7.2	Sump at Mill	ls	$60,000.00	1	$60,000			1	$60,000
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	7.5	$750,000		$0	8	$750,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000		$0	1	$100,000
				Sub-Total	**$2,620,000**		**$700,000**		$3,320,000
				Grand Total	**$22,921,984**		**$56,712,966**		**$79,634,950**
8.0	**EPCM**								
8.1	EPCM	ls	11%	22,921,984	$2,521,418	1	$8,000,000	22,921,985	$10,521,418
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,321,418**		**$8,000,000**		**$11,321,418**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$26,243,402**		**$64,712,966**		**$90,956,368**

TABLE 7
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 2a(Lower)

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.46	0	$0	0	$0	0	$0
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Place and Compact Mine Waste	m^3	$0.21	0	$0	0	$0	0	$0
				Sub-Total	**$0**		**$0**		**$0**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilization**								
2.1	Mobilization		5%	$11,741,237	$587,062	$33,409,705	$1,670,485	45,150,942	$2,257,547
2.2	Demobilization		2%	$11,741,237	$234,825	$33,409,705	$668,194	45,150,942	$903,019
				Sub-Total	**$821,887**		**$2,338,679**		**$3,160,566**
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.19	1,379,953	$255,291	8,531,736	$1,578,371	9,911,689	$1,833,662
3.2	Topsoil Stripping	m^2	$0.50	1,379,953	$689,977	8,531,736	$4,265,868	9,911,689	$4,955,845
3.3	Embankment Foundation Excavation	m^3	$1.65	142,875	$235,744	743,500	$1,226,775	886,375	$1,462,519
3.4	Embankment Foundation Preparation	m^2	$0.28	285,750	$80,010	1,487,000	$416,360	1,772,750	$496,370
3.5	Embankment Prepared Subgrade	m^2	$1.10	285,750	$314,325			285,750	$314,325
3.6	Embankment Foundation Finger Drains	m	$21.89	9,525	$208,502	49,567	$1,085,014	59,092	$1,293,517
3.7	Embankment Spine drain	m	$86.74	100	$8,674	300	$26,022	400	$34,696
3.8	Embankment Toe Drain	m^3	$2.20	0	$0	657,994	$1,447,587	657,994	$1,447,587
3.9	Embankment Construction (10 m wide crest)	m^3	$0.39	2,500,000	$975,000	0	$0	2,500,000	$975,000
3.10	Embankment Face Shaping	m^2	$0.28	655,355	$183,499			655,355	$183,499
3.11	Basin Foundation Preparation	m^2	$0.28	1,094,203	$306,377	7,044,736	$1,972,526	8,138,939	$2,278,903
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.10	1,094,203	$1,203,623	7,044,736	$7,749,210	8,138,939	$8,952,833
3.13	Basin Drain Blanket (400mm)	m^2	$1.10	1,094,203	$1,203,623	7,044,736	$7,749,210	8,138,939	$8,952,833
3.14	Basin Recalim Slot Excavation	m^3	$1.49	560,000	$834,400	1,698,400	$2,530,616	2,258,400	$3,365,016
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.10	78,120	$85,932	236,927	$260,620	315,047	$346,552
3.16	Basin Reclaim Slot Geotextile	m^2	$1.38	156,240	$215,611	473,854	$653,919	630,094	$869,530
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.50	78,120	$39,060	236,927	$118,464	315,047	$157,524
3.18	Basin Drainage Collection Laterals (100 mm)	m	$6.05	21,884	$132,399	140,895	$852,413	162,779	$984,812
3.19	Basin Drainage Collection Headers (250mm)	m	$27.94	2,188	$61,144	14,089	$393,660	16,278	$454,804
3.20	Basin Drainage Collection Headers (300mm)	m	$40.52	2,100	$85,092	6,369	$258,072	8,469	$343,164
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm	m	$550.00	400	$220,000	0	$0	400	$220,000
3.23	Relocation of Powerlines	km	$250,000.00	7.1	$1,775,000	0	$0	7	$1,775,000
				Sub-Total	**$9,113,283**		**$32,584,705**		**$41,697,989**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.19	30,000	$5,550	30,000	$5,550	60,000	$11,100
4.2	Topsoil Stripping	m^2	$0.76	30,000	$22,800	30,000	$22,800	60,000	$45,600
4.3	Excavation to Fill/Waste	m^3	$3.30	111,000	$366,300	111,000	$366,300	222,000	$732,600
4.4	Prepared Subgrade	m^2	$1.65	30,900	$50,985	30,900	$50,985	61,800	$101,970
4.5	Geomembrane Liner and Geonet	m^2	$5.76	61,800	$355,968	61,800	$355,968	123,600	$711,936
4.6	Reclaim and Pumpback System	ls	$50,000.00	1	$50,000	1	$50,000	2	$100,000
				Sub-Total	**$851,603**		**$851,603**		**$1,703,206**
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$19.00	0	$0	0	$0	0	$0
5.2	Major Temporary Channels	m	$87.00	4,960	$431,520		$0	4,960	$431,520
5.3	Minor Permanent Channels	m	$150.00	18,050	$2,707,500	0	$0	18,050	$2,707,500
5.4	Major Permanent Channels	m	$275.00		$0	0	$0	0	$0
				Sub-Total	**$3,139,020**				**$3,139,020**
6.0	**Tailing Delivery Line**								
6.1	Delivery Line With Adjacent Access Road	ls	$3,255,150.00	1	$3,255,150	1	$1,050,000	2	$4,305,150
6.2	Adjacent Access Road and Trench	m	$70.00	5,400	$378,000			5,400	$378,000
6.3	Valves and Fittings	ls	$162,757.50	1	$162,758	1	$105,000	2	$267,758
				Sub-Total	**$3,795,908**		**$1,050,000**		**$4,845,908**
7.0	**Reclaim Line**								
7.1	Reclaim Line	ls	$1,460,000.00	1	$1,460,000	1	$600,000	2	$2,060,000
7.2	Sump at Mill	ls	$60,000.00	1	$60,000			1	$60,000
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	7.5	$750,000		$0	8	$750,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000		$0	1	$100,000
				Sub-Total	**$2,620,000**		**$600,000**		$3,220,000
				Grand Total	**$20,341,701**		**$37,424,987**		**$57,766,688**
8.0	**EPCM**								
8.1	EPCM	ls	11%	20,341,701	$2,237,587	1	$8,000,000	20,341,702	$10,237,587
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,037,587**		**$8,000,000**		**$11,037,587**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$23,379,288**		**$45,424,987**		**$68,804,275**

TABLE 8
IDAHO GENERAL MINES, INC
MT. HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Siting Analysis
Site No. 3

Work By Owner

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
1.0	**Embankment Fill Placement**								
1.1	Construction Temporary Haul Road	m	$16.46	0	$0	0	$0	0	$0
1.2	Extra Haul Over Waste Dump Temp Haul Road	m^3/km	$0.12	0	$0	0	$0	0	$0
1.3	Extra Haul Over Waste Dump for Starter Embankment	m^3/km	$0.12	0	$0	0	$0	0	$0
1.4	Place and Compact Mine Waste	m^3	$0.21	0	$0	0	$0	0	$0
				Sub-Total	**$0**		**$0**		**$0**

Work By Contractor

				Starter Facility		Ultimate Facility		Total Facility	
Item	Description	Units	Unit Rate	Quantity	Total (US$)	Quantity	Total (US$)	Quantity	Total (US$)
2.0	**Mobilization/Demobilization**								
2.1	Mobilization		5%	$8,351,539	$417,577	$2,891,147	$144,557	11,242,685	$562,134
2.2	Demobilization		2%	$8,351,539	$167,031	$2,108,984	$42,180	10,460,523	$209,210
				Sub-Total	**$584,608**		**$186,737**		$771,345
3.0	**Earthworks**								
3.1	Clearing and Grubbing	m^2	$0.06	1,531,550	$88,064	12,914,510	$742,584	14,446,060	$830,648
3.2	Topsoil Stripping	m^2	$0.45	1,531,550	$689,198	12,914,510	$5,811,530	14,446,060	$6,500,727
3.3	Embankment Foundation Excavation	m^3	$1.50	153,750	$230,625	1,197,773	$1,796,659	1,351,523	$2,027,284
3.4	Embankment Foundation Preparation	m^2	$0.25	307,500	$76,875	2,395,545	$598,886	2,703,045	$675,761
3.5	Embankment Prepared Subgrade	m^2	$1.00	307,500	$307,500	2,395,545	$2,395,545	2,703,045	$2,703,045
3.6	Embankment Foundation Finger Drains	m	$19.90	10,250	$203,975		$0	10,250	$203,975
3.7	Embankment Spine drain	m	$78.85	120	$9,462	330	$26,021	450	$35,483
3.8	Embankment Toe Drain	m^3	$3.50	0	$0	1,162,238	$4,067,833	1,162,238	$4,067,833
3.9	Embankment Construction	m^3	$1.50	2,346,164	$3,519,246	0	$0	2,346,164	$3,519,246
3.10	Embankment Face Shaping	m^2	$0.25	135,800	$33,950			135,800	$33,950
3.11	Basin Foundation Preparation	m^2	$0.25	1,224,050	$306,013	10,518,965	$2,629,741	11,743,015	$2,935,754
3.12	Basin Prepared Subgrade (300mm)	m^2	$1.00	1,224,050	$1,224,050	10,518,965	$10,518,965	11,743,015	$11,743,015
3.13	Basin Drain Blanket (400mm)	m^2	$1.00	1,224,050	$1,224,050	10,518,965	$10,518,965	11,743,015	$11,743,015
3.14	Basin Recalim Slot Excavation	m^3	$1.35	576,000	$777,600	1,624,000	$2,192,400	2,200,000	$2,970,000
3.15	Basin Reclaim Slot Retarding Layer (200mm)	m^2	$1.00	79,200	$79,200	223,300	$223,300	302,500	$302,500
3.16	Basin Reclaim Slot Geotextile	m^2	$1.25	158,400	$198,000	446,600	$558,250	605,000	$756,250
3.17	Basin Reclaim Slot Erosion Protection (150mm)	m^2	$0.45	79,200	$35,640	223,300	$100,485	302,500	$136,125
3.18	Basin Drainage Collection Laterals (100 mm)	m	$5.05	26,065	$131,628	214,845	$1,084,967	240,910	$1,216,596
3.19	Basin Drainage Collection Headers (250mm)	m	$25.40	2,607	$66,205	21,485	$545,706	24,091	$611,911
3.20	Basin Drainage Collection Headers (300mm)	m	$36.84	2,160	$79,574	6,090	$224,356	8,250	$303,930
3.21	Basin Drainage Collection Headers (Solid HDPE 300 mm SDR 17)	m	$500.00	450	$225,000		$0	450	$225,000
				Sub-Total	**$9,505,855**		**$44,036,193**		**$53,542,048**
4.0	**Seepage Collection Pond**								
4.1	Clearing and Grubbing	m^2	$0.06	30,000	$1,725	0	$0	30,000	$1,725
4.2	Topsoil Stripping	m^2	$0.69	30,000	$20,700	0	$0	30,000	$20,700
4.3	Excavation to Fill/Waste	m^3	$3.00	111,000	$333,000	0	$0	111,000	$333,000
4.4	Prepared Subgrade	m^2	$1.50	30,900	$46,350	0	$0	30,900	$46,350
4.5	Geomembrane Liner and Geonet	m^2	$5.25	61,800	$324,450	0	$0	61,800	$324,450
4.6	Reclaim and Pumpback System	ls	$45,000.00	1	$45,000	0	$0	1	$45,000
				Sub-Total	**$771,225**		**$0**		**$771,225**
5.0	**Diversion Channels**								
5.1	Minor Temporary Channels	m	$17.00	0	$0	0	$0	0	$0
5.2	Major Temporary Channels	m	$79.00	4,593	$362,847	26,696	$2,108,984	31,289	$2,471,831
5.3	Minor Permanent Channels	m	$136.00	0	$0	0	$0	0	$0
5.4	Major Permanent Channels	m	$250.00	14,403	$3,600,750	0	$0	14,403	$3,600,750
				Sub-Total	**$3,963,597**		**$2,108,984**		**$6,072,581**
6.0	**Tailing Delivery Line**								
6.1	Delivery Line	ls	$3,696,510.00	1	$3,696,510	1	$785,750	2	$4,482,260
6.2	Adjacent Access Road and Trench	m	$70.00	7,214	$504,980			7,214	$504,980
6.3	Valves and Fittings	ls	$369,651.00	1	$369,651	1	$78,575	2	$448,226
6.4	Culvert Crossings	m	$1,650.00	30	$49,500			30	$49,500
6.5	Sump at Low Point	ls	$50,000.00	1	$50,000			1	$50,000
				Sub-Total	**$4,670,641**		**$864,325**		**$5,534,966**
7.0	**Reclaim Line**								
7.1	Reclaim Line	ls	$2,112,792.00	1	$2,112,792	1	$700,000	2	$2,812,792
7.2	Sump at Low Point	ls	$50,000.00	1	$50,000			1	$50,000
7.3	Barge Costs	ls	$250,000.00	1	$250,000		$0	1	$250,000
7.4	Power Line Costs	km	$100,000.00	7.0	$700,000		$0	7	$700,000
7.5	Electrical Equipment	ls	$100,000.00	1.0	$100,000		$0	1	$100,000
				Sub-Total	**$3,212,792**		**$700,000**		**$3,912,792**
				Grand Total	**$22,708,718**		**$47,896,239**		**$70,604,956**
8.0	**EPCM**								
8.1	EPCM	ls	11%	22,708,718	$2,497,959	1	$8,000,000	22,708,719	$10,497,959
8.2	Engineering Phase II and Phase III	ls	$ 800,000.00	1	$800,000			1	$800,000
				Subtotal	**$3,297,959**		**$8,000,000**		**$11,297,959**
9.0	**Owners Costs**								
9.1	Owners Costs	ls			Not Included		Not Included		
				Subtotal	**$0**		**$0**		**$0**
10.0	**Contingency**								
10.1	Contingency				Not Included		Not Included		
					$0		**$0**		**$0**
				Grand Total	**$26,006,677**		**$55,896,239**		**$81,902,915**

TABLE 10
IDAHO GENERAL MINES, INC
MT HOPE PROJECT
PRELIMINARY ANALYSIS OF T&F ALTERNATIVES

		Operating Cost Starter Facility	Operating Cost Ultimate Facility	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20	Year 21	Year 22	Year 23	Year 24	Year 25	Year 26	Year 27
Site 1, Single site																														
Estimated Capital Cost Construction	$88,483,158			$24,400,635	$4,828,425					$4,828,425					$4,828,425					$4,828,425					$4,828,425					$4,828,425
Estimated Capital Cost Reclamation	$48,320,000																													
Estimated Operating Cost	$106,804,120	$0.112	$0.124		$1,632,280	$1,635,296	$1,638,311	$1,641,327	$1,644,343	$1,647,359	$1,650,374	$1,653,390	$1,656,406	$1,659,422	$1,662,437	$1,665,453	$1,668,469	$1,671,485	$1,674,500	$1,677,516	$1,680,532	$1,683,548	$1,686,563	$1,689,579	$1,692,595	$1,695,610	$1,698,626	$1,701,642	$1,704,658	$1,707,673
	$243,707,279			$24,400,635	$6,561,705	$1,635,296	$1,638,311	$1,641,327	$1,644,343	$6,576,784	$1,650,374	$1,653,390	$1,656,406	$1,659,422	$6,591,862	$1,665,453	$1,668,469	$1,671,485	$1,674,500	$6,505,941	$1,680,532	$1,683,548	$1,686,563	$1,689,579	$6,522,030	$1,695,610	$1,698,626	$1,701,642	$1,704,658	$6,537,898
NPV 7%	$69,229,487																													
Site 1a, (construct upper facility first Stage 1 (upper facility)																														
Estimated Capital Cost Construction	$28,226,921			$13,104,921	$5,040,667					$5,040,667					$5,040,667															
Estimated Capital Cost Reclamation	$9,920,000																		$4,960,000	$4,960,000										
Estimated Operating Cost	$17,556,500	$0.081	$0.104		$1,182,600	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$1,322,517	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$1,462,433	$1,490,417	$1,518,400														
	$56,703,421			$13,104,921	$6,223,267	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$6,363,183	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$6,503,100	$1,490,417	$1,518,400	$0	$4,960,000	$4,960,000	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Stage 2 (lower facility)																														
Estimated Capital Cost Construction	$72,616,425																$24,043,842	$4,857,258					$4,857,258					$4,857,258		
Estimated Capital Cost Reclamation	$40,780,000																													$0
Estimated Operating Cost	$84,274,120	$0.112	$0.124															$1,827,900	$1,831,733	$1,835,565	$1,839,398	$1,843,230	$1,847,063	$1,850,895	$1,854,728	$1,858,560	$1,862,393	$1,866,225	$1,870,058	$1,873,890
	$197,630,545																$34,043,842	$6,685,158	$1,831,733	$1,835,565	$1,839,398	$1,843,230	$6,904,321	$1,850,895	$1,854,728	$1,858,560	$1,862,393	$6,723,483	$1,870,058	$1,873,890
	$263,383,966			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0				$28,562,242	$6,685,158	$6,591,733	$6,595,565	$6,599,398	$6,603,230	$6,904,321	$6,900,895	$6,854,728	$6,858,560	$6,862,393	$6,723,483	$6,870,058	$6,873,890
NPV 7%	$60,337,198			$13,104,921	$6,223,267	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$6,363,183	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$6,503,100	$1,490,417	$1,518,400														
Site 1b																														
Estimated Capital Cost Construction	$98,337,737			$28,872,371	$5,189,644					$5,189,644					$5,189,644					$5,189,644					$5,189,644					$5,189,644
Estimated Capital Cost Reclamation	$44,240,000																													
Estimated Operating Cost	$106,677,820	$0.109	$0.127		$1,585,580	$1,589,986	$1,594,418	$1,598,844	$1,603,271	$1,607,699	$1,612,127	$1,616,555	$1,620,983	$1,625,411	$1,629,839	$1,634,267	$1,638,694	$1,643,122	$1,647,550	$1,651,978	$1,656,406	$1,660,834	$1,665,262	$1,669,690	$1,674,117	$1,678,545	$1,682,973	$1,687,401	$1,691,829	$1,696,257
	$211,807,982			$28,872,371	$6,775,304	$1,589,986	$1,594,418	$1,598,844	$1,603,271	$6,797,343	$1,612,127	$1,616,555	$1,620,983	$1,625,411	$6,819,482	$1,634,267	$1,638,694	$1,643,122	$1,647,550	$6,841,622	$1,656,406	$1,660,834	$1,665,262	$1,669,690	$6,863,761	$1,678,545	$1,682,973	$1,687,401	$1,691,829	$6,885,900
NPV 7%	$64,772,179																													
Site 1c, (construct upper facility first Stage 1 (upper facility)																														
Estimated Capital Cost Construction	$28,226,921			$13,104,921	$5,040,667					$5,040,667					$5,040,667															
Estimated Capital Cost Reclamation	$9,920,000																		$4,960,000	$4,960,000										
Estimated Operating Cost	$17,556,500	$0.081	$0.104		$1,182,600	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$1,322,517	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$1,462,433	$1,490,417	$1,518,400														
	$56,703,421			$13,104,921	$6,223,267	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$6,363,183	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$6,503,100	$1,490,417	$1,518,400	$0	$4,960,000	$4,960,000	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Site 1c lower																														
Estimated Capital Cost Construction	$88,413,716																$28,872,371	$8,054,134					$8,054,134					$8,054,134		
Estimated Capital Cost Reclamation	$44,240,000																													
Estimated Operating Cost	$83,987,980	$0.108	$0.127															$1,575,340	$1,581,119	$1,586,896	$1,592,678	$1,598,457	$1,604,236	$1,610,015	$1,615,794	$1,621,573	$1,627,353	$1,633,132	$1,638,911	$1,644,690
	$217,641,676																	$7,629,474	$1,581,119	$1,586,896	$1,592,678	$1,598,457	$7,658,370	$1,610,015	$1,615,794	$1,621,573	$1,627,353	$7,687,266	$1,638,911	$1,644,690
	$372,349,087			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$28,872,371	$7,629,474	$6,541,119	$6,546,896	$1,592,678	$1,598,457	$7,658,370	$1,610,015	$6,615,794	$1,621,573	$1,627,353	$7,687,266	$1,638,911	$1,644,690
				$13,104,921	$6,223,267	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$6,363,183	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$6,503,100	$1,490,417	$30,390,771														
NPV 7%	$83,562,880																													
Site 2 (single Kobeh Valley facility)																														
Estimated Capital Cost Construction	$90,850,368			$26,343,402	$4,977,920					$4,977,920					$4,977,920					$4,977,920					$4,977,920					$4,977,920
Estimated Capital Cost Reclamation	$45,350,000																													
Estimated Operating Cost	$158,862,600	$0.162	$0.188		$2,365,200	$2,371,682	$2,378,125	$2,384,587	$2,391,049	$2,397,511	$2,403,974	$2,410,436	$2,416,898	$2,423,361	$2,429,823	$2,436,285	$2,442,748	$2,449,210	$2,455,672	$2,462,134	$2,468,597	$2,475,059	$2,481,521	$2,487,984	$2,494,446	$2,500,908	$2,507,370	$2,513,833	$2,520,295	$2,526,757
	$295,163,968			$26,343,402	$7,343,120	$2,371,682	$2,378,125	$2,384,587	$2,391,049	$7,375,432	$2,403,974	$2,410,436	$2,416,898	$2,423,361	$7,407,743	$2,436,285	$2,442,748	$2,449,210	$2,455,672	$7,440,055	$2,468,597	$2,475,059	$2,481,521	$2,487,984	$7,472,366	$2,500,908	$2,507,370	$2,513,833	$2,520,295	$7,504,678
NPV 7%	$72,301,922																													
Site 2a, (construct small facility Tyrone Creek drainage first Stage 1 (upper facility)																														
Estimated Capital Cost Construction	$28,226,921			$13,104,921	$5,040,667					$5,040,667					$5,040,667															
Estimated Capital Cost Reclamation	$9,920,000																		$4,960,000	$4,960,000										
Estimated Operating Cost	$17,556,500	$0.081	$0.104		$1,182,600	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$1,322,517	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$1,462,433	$1,490,417	$1,518,400														
	$56,703,421			$13,104,921	$6,223,267	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$6,363,183	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$6,503,100	$1,490,417	$1,518,400	$0	$4,960,000	$4,960,000	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Site 2a (construct Kobeh Valley facility second)																														
Estimated Capital Cost Construction	$88,804,275																$23,379,288	$4,542,490					$4,542,490					$4,542,490		
Estimated Capital Cost Reclamation	$34,010,000																													
Estimated Operating Cost	$120,544,800	$0.153	$0.194															$2,233,800	$2,243,228	$2,252,658	$2,262,088	$2,271,517	$2,280,948	$2,290,375	$2,299,804	$2,309,233	$2,318,663	$2,328,092	$2,337,521	$2,346,950
	$223,359,175																	$6,776,298	$2,243,228	$2,252,658	$2,262,088	$2,271,517	$6,823,445	$2,290,375	$2,299,804	$2,309,233	$2,318,663	$6,870,590	$2,337,521	$2,346,950
	$279,063,696			$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$23,379,288	$6,776,298	$7,203,229	$7,212,658	$2,262,088	$2,271,517	$6,823,445	$2,290,375	$2,299,804	$2,309,233	$2,318,663	$6,870,590	$2,337,521	$2,346,950
				$13,104,921	$6,223,267	$1,210,583	$1,238,567	$1,266,550	$1,294,533	$6,363,183	$1,350,500	$1,378,483	$1,406,467	$1,434,450	$6,503,100	$1,490,417	$34,897,588														
NPV 7%	$63,216,101																													
Site 3																														
Estimated Capital Cost Construction	$81,902,815			$26,006,677	$4,298,711					$4,298,711					$4,298,711					$4,298,711					$4,298,711					$4,298,711
Estimated Capital Cost Reclamation	$41,015,000																													
Estimated Operating Cost	$116,499,240	$0.145	$0.112		$2,117,000	$2,109,197	$2,101,395	$2,093,592	$2,085,790	$2,077,987	$2,070,184	$2,062,382	$2,054,579	$2,046,776	$2,038,974	$2,031,171	$2,023,369	$2,015,566	$2,007,763	$1,999,961	$1,992,158	$1,984,355	$1,976,553	$1,968,750	$1,960,948	$1,953,145	$1,945,342	$1,937,540	$1,929,737	$1,921,934
	$238,417,155			$26,006,677	$6,416,711	$2,109,197	$2,101,395	$2,093,592	$2,085,790	$6,377,698	$2,070,184	$2,062,382	$2,054,579	$2,046,776	$6,336,684	$2,031,171	$2,023,369	$2,015,566	$2,007,763	$6,298,671	$1,992,158	$1,984,355	$1,976,553	$1,968,750	$6,260,658	$1,953,145	$1,945,342	$1,937,540	$1,929,737	$6,221,645
NPV 7%	$64,221,367																													

Year 28	Year 29	Year 30	Year 31	Year 32	Year 33	Year 34	Year 35	Year 36	Year 37	Year 38	Year 39	Year 40
				$4,929,425					$4,929,425			
$1,710,689	$1,713,705	$1,716,721	$1,719,736	$1,722,752	$1,725,768	$1,728,784	$1,731,799	$1,734,815	$1,737,831	$1,740,847	$1,743,862	$1,746,878
$1,710,689	$1,713,705	$1,716,721	$1,719,736	$6,652,177	$1,725,768	$1,728,784	$1,731,799	$1,734,815	$6,667,256	$1,740,847	$1,743,862	$1,746,878
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
		$4,857,258					$4,857,258					$4,857,258
$1,677,723	$1,681,555	$1,685,388	$1,689,220	$1,693,053	$1,696,885	$1,700,718	$1,704,550	$1,708,383	$1,712,215	$1,716,048	$1,719,880	$1,723,713
$1,677,723	$1,681,555	$6,542,646	$1,689,220	$1,693,053	$1,696,885	$1,700,718	$6,561,808	$1,708,383	$1,712,215	$1,716,048	$1,719,880	$6,580,971
$1,677,723	$1,681,555	$6,542,646	$1,689,220	$1,693,053	$1,696,885	$1,700,718	$6,561,808	$1,708,383	$1,712,215	$1,716,048	$1,719,880	$6,580,971
				$5,189,644					$5,189,644			
$1,700,685	$1,705,112	$1,709,540	$1,713,968	$1,718,396	$1,722,824	$1,727,252	$1,731,680	$1,736,108	$1,740,535	$1,744,963	$1,749,391	$1,753,819
$1,700,685	$1,705,112	$1,709,540	$1,713,968	$6,908,040	$1,722,824	$1,727,252	$1,731,680	$1,736,108	$6,930,179	$1,744,963	$1,749,391	$1,753,819
		$8,054,134					$8,054,134					$8,054,134
$1,650,469	$1,656,248	$1,662,028	$1,667,807	$1,673,586	$1,679,365	$1,685,144	$1,690,923	$1,696,703	$1,702,482	$1,708,261	$1,714,040	$1,719,819
$1,650,469	$1,656,248	$7,716,162	$1,667,807	$1,673,586	$1,679,365	$1,685,144	$7,745,058	$1,696,703	$1,702,482	$1,708,261	$1,714,040	$7,773,954
$1,650,469	$1,656,248	$7,716,162	$1,667,807	$1,673,586	$1,679,365	$1,685,144	$7,745,058	$1,696,703	$1,702,482	$1,708,261	$1,714,040	$7,773,954
				$4,977,920					$4,977,920			
$2,533,220	$2,539,682	$2,546,144	$2,552,607	$2,559,069	$2,565,531	$2,571,993	$2,578,456	$2,584,918	$2,591,380	$2,597,843	$2,604,305	$2,610,767
$2,533,220	$2,539,682	$2,546,144	$2,552,607	$7,536,989	$2,565,531	$2,571,993	$2,578,456	$2,584,918	$7,569,301	$2,597,843	$2,604,305	$2,610,767
		$4,542,490					$4,542,490					$4,542,490
$2,356,379	$2,365,808	$2,375,238	$2,384,667	$2,394,096	$2,403,525	$2,412,954	$2,422,383	$2,431,813	$2,441,242	$2,450,671	$2,460,100	$2,469,529
$2,356,379	$2,365,808	$6,917,736	$2,384,667	$2,394,096	$2,403,525	$2,412,954	$6,964,882	$2,431,813	$2,441,242	$2,450,671	$2,460,100	$7,012,028
$2,356,379	$2,365,808	$6,917,736	$2,384,667	$2,394,096	$2,403,525	$2,412,954	$6,964,882	$2,431,813	$2,441,242	$2,450,671	$2,460,100	$7,012,028
				$4,290,711					$4,290,711			
$1,914,132	$1,906,329	$1,898,527	$1,890,724	$1,882,921	$1,875,119	$1,867,316	$1,859,513	$1,851,711	$1,843,908	$1,836,106	$1,828,303	$1,820,500
$1,914,132	$1,906,329	$1,898,527	$1,890,724	$6,182,632	$1,875,119	$1,867,316	$1,859,513	$1,851,711	$6,143,619	$1,836,106	$1,828,303	$1,820,500

Year 41	Year 42	Year 43	Year 44	Year 45	Year 46	Year 47	Year 48	Year 49	Year 50	Year 51	Year 52	Year 53
	$4,929,425					$4,929,425					$4,929,425	
$1,749,894	$1,752,910	$1,755,925	$1,758,941	$1,761,957	$1,764,972	$1,767,988	$1,771,004	$1,774,020	$1,777,035	$1,780,051	$1,783,067	$1,786,083
$1,749,894	$6,682,334	$1,755,925	$1,758,941	$1,761,957	$1,764,972	$6,697,413	$1,771,004	$1,774,020	$1,777,035	$1,780,051	$6,712,492	$1,786,083
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
				$4,857,258					$4,857,258			
$1,727,545	$1,731,378	$1,735,210	$1,739,043	$1,742,875	$1,746,708	$1,750,540	$1,754,373	$1,758,205	$1,762,038	$1,765,870	$1,769,703	$1,773,535
$1,727,545	$1,731,378	$1,735,210	$1,739,043	$6,600,133	$1,746,708	$1,750,540	$1,754,373	$1,758,205	$6,619,296	$1,765,870	$1,769,703	$1,773,535
$1,727,545	$1,731,378	$1,735,210	$1,739,043	$6,600,133	$1,746,708	$1,750,540	$1,754,373	$1,758,205	$6,619,296	$1,765,870	$1,769,703	$1,773,535
	$5,189,644					$5,189,644					$5,189,644	
$1,758,247	$1,762,675	$1,767,103	$1,771,530	$1,775,958	$1,780,386	$1,784,814	$1,789,242	$1,793,670	$1,798,098	$1,802,526	$1,806,953	$1,811,381
$1,758,247	$6,952,318	$1,767,103	$1,771,530	$1,775,958	$1,780,386	$6,974,458	$1,789,242	$1,793,670	$1,798,098	$1,802,526	$6,996,597	$1,811,381
				$8,054,134					$8,054,134			
$1,725,598	$1,731,378	$1,737,157	$1,742,936	$1,748,715	$1,754,494	$1,760,273	$1,766,053	$1,771,832	$1,777,611	$1,783,390	$1,789,169	$1,794,948
$1,725,598	$1,731,378	$1,737,157	$1,742,936	$7,802,849	$1,754,494	$1,760,273	$1,766,053	$1,771,832	$7,831,745	$1,783,390	$1,789,169	$1,794,948
$1,725,598	$1,731,378	$1,737,157	$1,742,936	$7,802,849	$1,754,494	$1,760,273	$1,766,053	$1,771,832	$7,831,745	$1,783,390	$1,789,169	$1,794,948
	$4,977,920					$4,977,920					$4,977,920	
$2,617,230	$2,623,692	$2,630,154	$2,636,616	$2,643,079	$2,649,541	$2,656,003	$2,662,466	$2,668,928	$2,675,390	$2,681,852	$2,688,315	$2,694,777
$2,617,230	$7,601,612	$2,630,154	$2,636,616	$2,643,079	$2,649,541	$7,633,924	$2,662,466	$2,668,928	$2,675,390	$2,681,852	$7,666,235	$2,694,777
				$4,542,490					$4,542,490			
$2,478,958	$2,488,388	$2,497,817	$2,507,246	$2,516,675	$2,526,104	$2,535,533	$2,544,963	$2,554,392	$2,563,821	$2,573,250	$2,582,679	$2,592,108
$2,478,958	$2,488,388	$2,497,817	$2,507,246	$7,059,174	$2,526,104	$2,535,533	$2,544,963	$2,554,392	$7,106,320	$2,573,250	$2,582,679	$2,592,108
$2,478,958	$2,488,388	$2,497,817	$2,507,246	$7,059,174	$2,526,104	$2,535,533	$2,544,963	$2,554,392	$7,106,320	$2,573,250	$2,582,679	$2,592,108
	$4,290,711					$4,290,711					$4,290,711	
$1,812,698	$1,804,895	$1,797,092	$1,789,290	$1,781,487	$1,773,685	$1,765,882	$1,758,079	$1,750,277	$1,742,474	$1,734,671	$1,726,869	$1,719,066
$1,812,698	$6,104,606	$1,797,092	$1,789,290	$1,781,487	$1,773,685	$6,065,593	$1,758,079	$1,750,277	$1,742,474	$1,734,671	$6,026,580	$1,719,066

Year 54	Year 55	Year 56	Year 57	Year 58	Year 59	Year 60	Year 61	Year 62	Year 63	year 64	year 65
			$4,929,425					$4,929,425			
$1,789,098	$1,792,114	$1,795,130	$1,798,146	$1,801,161	$1,804,177	$1,807,193	$1,810,209	$1,813,724	$1,816,240	$24,160,000	$24,160,000
$1,789,098	$1,792,114	$1,795,130	$6,727,571	$1,801,161	$1,804,177	$1,807,193	$1,810,209	$6,742,649	$1,816,240	$24,160,000	$24,160,000
$0	$0	$0	$0	$0	$0	$0	$0	$0	$0		
	$4,857,258					$4,857,258					
$1,777,368	$1,781,200	$1,785,033	$1,788,865	$1,792,698	$1,796,530	$1,800,363	$1,804,195	$1,808,028	$1,811,860	$20,380,000	$20,380,000
$1,777,368	$6,638,458	$1,785,033	$1,788,865	$1,792,698	$1,796,530	$6,657,621	$1,804,195	$1,808,028	$1,811,860	20380000	$20,380,000
$1,777,368	$6,638,458	$1,785,033	$1,788,865	$1,792,698	$1,796,530	$6,657,621	$1,804,195	$1,808,028	$1,811,860	$20,380,000	$20,380,000
			$5,189,644					$5,189,644			
$1,815,809	$1,820,237	$1,824,665	$1,829,093	$1,833,521	$1,837,949	$1,842,376	$1,846,804	$1,851,232	$1,855,660	$22,120,000	$22,120,000
$1,815,809	$1,820,237	$1,824,665	$7,018,736	$1,833,521	$1,837,949	$1,842,376	$1,846,804	$7,040,876	$1,855,660	$22,120,000	$22,120,000
	$8,054,134					$8,054,134					
$1,800,728	$1,806,507	$1,812,286	$1,818,065	$1,823,844	$1,829,623	$1,835,403	$1,841,182	$1,846,961	$1,852,740	$22,120,000	$22,120,000
$1,800,728	$7,860,641	$1,812,286	$1,818,065	$1,823,844	$1,829,623	$7,889,537	$1,841,182	$1,846,961	$1,852,740	$22,120,000	$22,120,000
$1,800,728	$7,860,641	$1,812,286	$1,818,065	$1,823,844	$1,829,623	$7,889,537	$1,841,182	$1,846,961	$1,852,740	$22,120,000	$22,120,000
			$4,977,920					$4,977,920			
$2,701,239	$2,707,702	$2,714,164	$2,720,626	$2,727,089	$2,733,551	$2,740,013	$2,746,475	$2,752,938	$2,759,400	$22,675,000	$22,675,000
$2,701,239	$2,707,702	$2,714,164	$7,698,547	$2,727,089	$2,733,551	$2,740,013	$2,746,475	$7,730,858	$2,759,400	$22,675,000	$22,675,000
	$4,542,490					$4,542,490					
$2,601,538	$2,610,967	$2,620,396	$2,629,825	$2,639,254	$2,648,683	$2,658,113	$2,667,542	$2,676,971	$2,686,400	$17,005,000	$17,005,000
$2,601,538	$7,153,465	$2,620,396	$2,629,825	$2,639,254	$2,648,683	$7,200,611	$2,667,542	$2,676,971	$2,686,400	$17,005,000	$17,005,000
$2,601,538	$7,153,465	$2,620,396	$2,629,825	$2,639,254	$2,648,683	$7,200,611	$2,667,542	$2,676,971	$2,686,400	$17,005,000	$17,005,000
			$4,290,711					$4,290,711			
$1,711,264	$1,703,461	$1,695,658	$1,687,856	$1,680,053	$1,672,250	$1,664,448	$1,656,645	$1,648,843	$1,641,040	$20,507,500	$20,507,500
$1,711,264	$1,703,461	$1,695,658	$5,987,568	$1,680,053	$1,672,250	$1,664,448	$1,656,645	$5,948,553	$1,641,040	$20,507,500	$20,507,500

TABLE 9

IDAHO GENERAL MINES, INC

MT HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Analysis

Decision Matrix

Alternative	NPV (7%)	Initial Capital Cost	Operating Cost	NPV (20%)	Initial Capital (25%)	Operating Cost (15%)	Permit Time (15%)	Land Position (10%)	Environmental (7.5%)	Technical (7.5%)	Score	Overall Rank
No.1	$60,229,497	$24,400,635	$106,904,120	0.95	5.30	1.56		1	6.6	7.0	268	4
No.1a (two facilities)	$60,337,198	$13,104,921	$101,830,620	1.00	1.00	1.03		1	7.0	5.5	144	1
No.1b	$64,772,179	$28,872,371	$106,677,820	3.22	7.00	1.54		2	6.1	7.3	319	7
No. 1c (two facilities)	$63,562,890	$13,104,921	$101,544,460	2.62	1.00	1.00		2	6.6	9.4	180	3
No.2	$72,301,922	$26,243,402	$158,862,600	7.00	6.00	7.00		4	1.0	1.0	310	6
No.2a (two facilities)	$63,216,101	$13,104,921	$138,101,400	2.44	1.00	4.83		4	2.3	1.6	167	2
No.3	$64,221,387	$26,006,677	$116,499,240	2.95	5.91	2.57		3	1.6	6.2	275	5

Rating Criteria

Alternatives rated from 1 to 7, with 1 being best

Costs were rated with a formula that compared the cost of each alternative based on the difference of the costs between the highest priced and lowest alternatives priced. This was used as to not penalize alternatives that were extremely close in cost.

Site Descriptions:

Alternative 1: One large site along the Highway.
Alternative 1a: One upper site and one smaller lower site along the Highway.
Alternative 1b: One large site that uses Highway 278 causing relocation of the Highway
Alternative 1c: Lower site that uses Highway 278 causing relocation of the road and creates a smaller upper site.
Alternative 2: One large site that is West of the pit.
Alternative 2a: One upper site and one site West of the pit (over the divide in Kobeh Valley.
Alternative 3. One large pit that is Southeast of the Pit. This crosses Highway 278 but doesn't require relocation of the Highway.

Table 11
IDAHO GENERAL MINES, INC
MT HOPE FEASIBILITY STUDY PHASE I

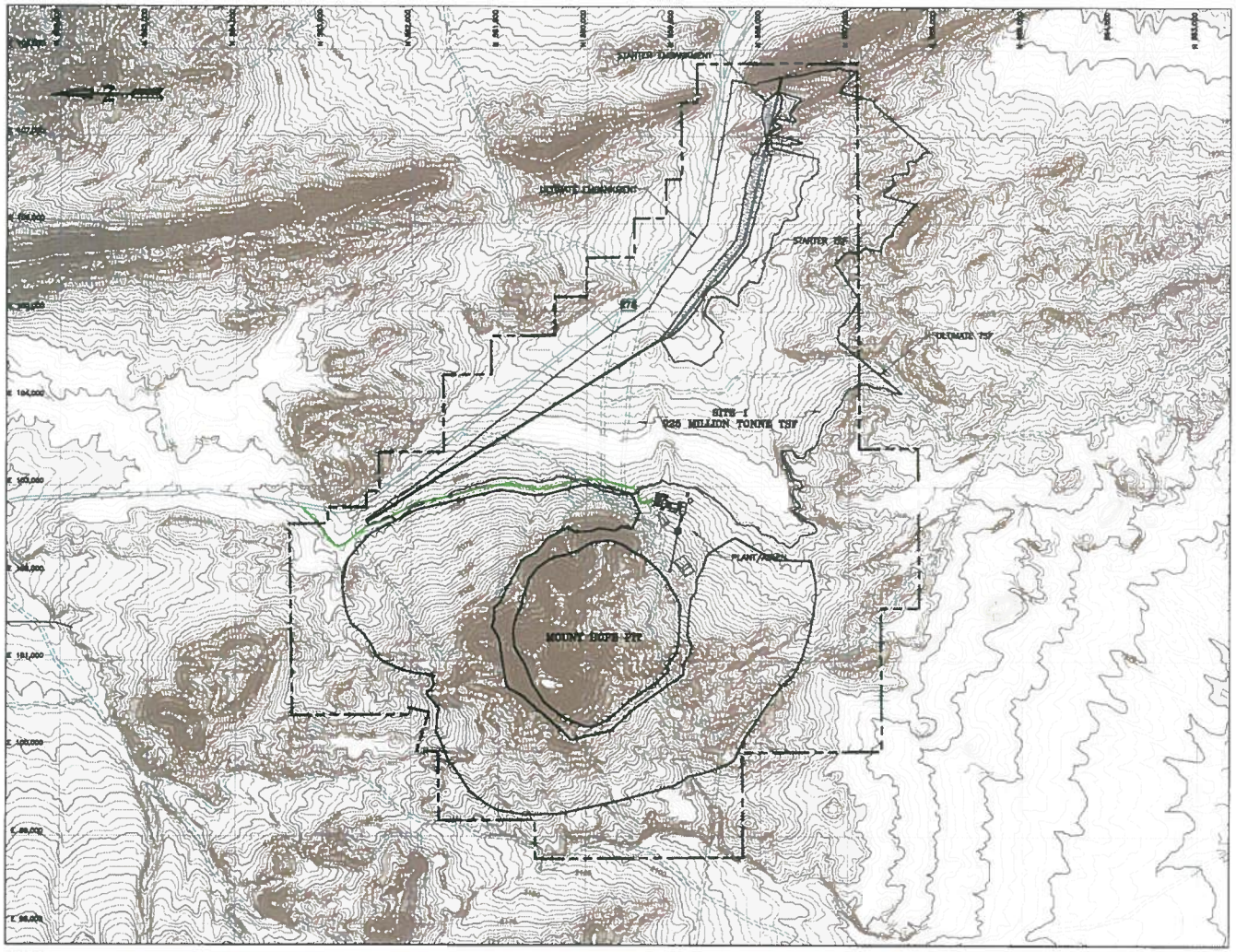
Tailing Storage Facility Alternative Analysis
Enviromental Considerations (Sub-Scores)

Site	Visual Impact	Impacted Culture Resources	Fugitive Dust Visual Impact	Ground Water	Surface Water	Vegetation	Raw Score	Rating
1	6.50	3	5.5	6	5	2	28.00	6.6
1a	6.50	3.5	5.5	6	4.5	3	29.00	7.0
1b	5.00	3.5	4	6	6.5	2	27.00	6.1
1c	5.00	3.5	4	6	6.5	3	28.00	6.6
2	1.00	4	2	3	2	3	15.00	1.0
2a	2.50	4	2.5	4	2	3	18.00	2.3
3	3.00	2	3.5	3	3	2	16.50	1.6

Table 12
IDAHO GENERAL MINES, INC
MT HOPE FEASIBILITY STUDY PHASE I

Tailing Storage Facility Alternative Analysis
Technical Considerations (Sub-Score)

Site	Sand Volume	Surface Water Hydrology	Depth to GW	Topo	Location From Mill	Operating Ease	Geotechnical Risk	Impacts on Other Facilities	Raw Score	Rating
1	5.52	4	5.5	1.5	2	1.5	5.5	5	30.52	7.0
1a	5.43	3.5	5.5	1.5	1.5	2	5.5	4	28.93	5.5
1b	2.30	6.5	5.5	2	3	2	3.5	6	30.80	7.3
1c	4.62	6.5	5.5	2	2.5	2.5	3.5	6	33.12	9.4
2	4.62	2	1.5	4	4	5	2	1	24.12	1.0
2a	5.29	2	2	3.5	4	4	2.5	1.5	24.79	1.6
3	5.15	3	3.5	2.5	6	5	2.5	2	29.65	6.2



LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	15,432,482
Volume of TSF and Embankment (M^3)	765,724,744
Volume of Embankment (M^3)	125,840,715
Capacity of Embankment (TONNES)	201,345,144
Embankment Elevation (M)	2,015
TSF Volume (M^3)	639,884,029
Capacity of TSF (TONNES)	831,849,238
Starter Embankment Volume (M^2)	5,766,023
Starter Embankment Elevation (M)	1,910
Starter Embankment Capacity (TONNES)	9,225,637
Starter TSF and Embankment Footprint Area (M^2)	1,566,289
Starter TSF and Embankment Volume (M^3)	15,794,296
Starter TSF Volume (M^3)	10,028,273
Capacity of Emankment Less Starter Embankment (TONNES)	192,119,507
Total Capacity (TONNES)	1,023,968,745

FOR DISCUSSION PURPOSES ONLY

CLIENT: IDAHO GENERAL MINES, INC.

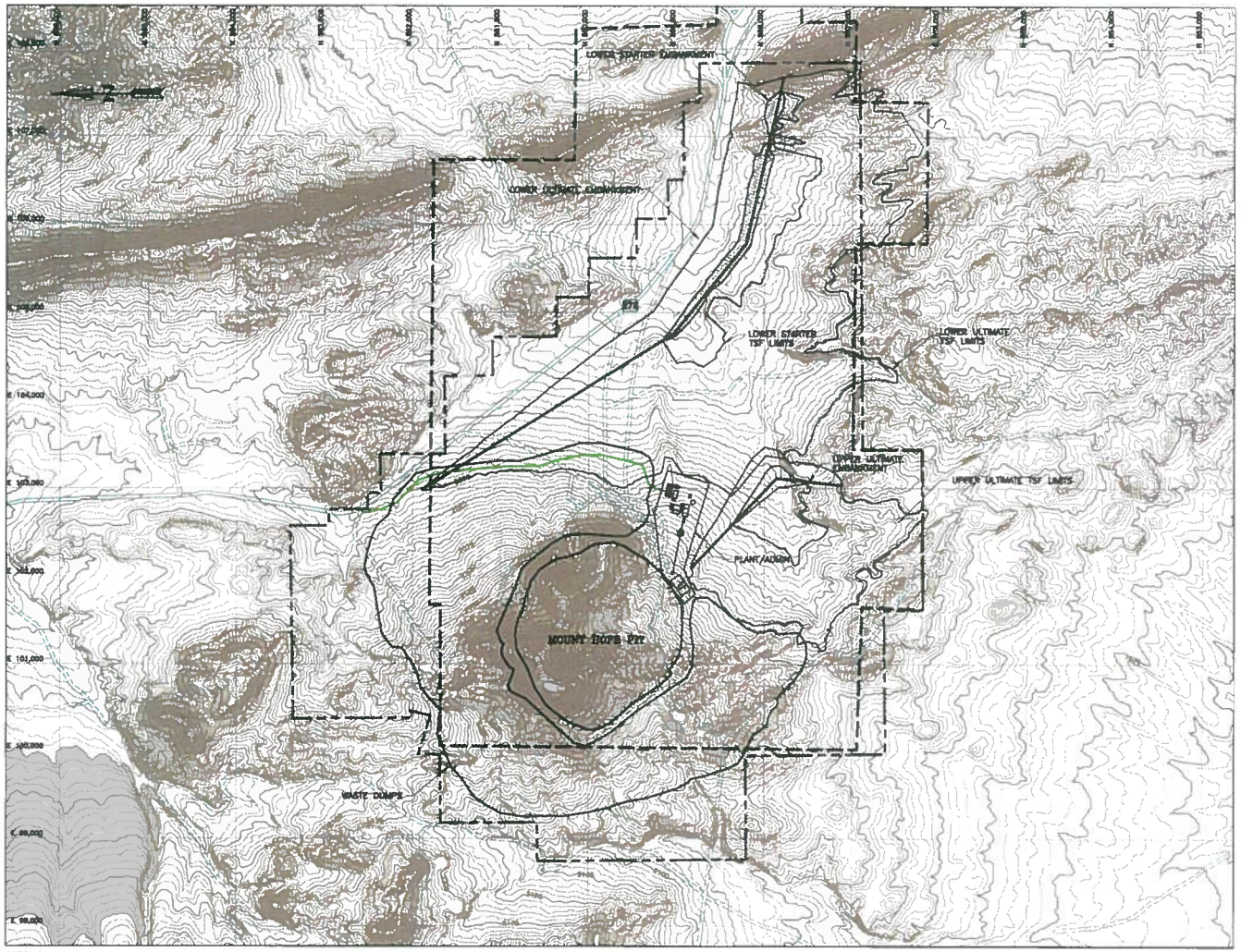
PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 1

SWC
SMITH WILLIAMS CONSULTANTS, INC.
3436 West 38th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-8387 Fax: 303-433-8692

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	07/29/05

FILENAME	FIGURE No.	REV
1029F28	1	A



LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

LOWER TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	12,131,898
Volume of TSF and Embankment (M^3)	800,761,952
Volume of Embankment (M^3)	97,098,714
Capacity of Embankment (TONNES)	155,357,942
Embankment Elevation (M)	2,002
TSF Volume (M^3)	596,583,357
Capacity of TSF (TONNES)	775,558,364
Starter Embankment Volume (M^3)	3,277,620
Starter Embankment Elevation (M)	1,905
Starter Embankment Capacity (TONNES)	5,244,192
Starter TSF and Embankment Footprint Area (M^2)	1,524,661
Starter TSF and Embankment Volume (M^3)	12,919,448
Starter TSF Volume (M^3)	9,641,828
Capacity of Emankment Less Starter Embankment (TONNES)	150,113,750
Total Capacity (TONNES)	800,761,652

UPPER TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	4,146,600
Volume of TSF and Embankment (M^3)	128,457,205
Volume of Embankment (M^3)	16,829,273
Capacity of Embankment (TONNES)	26,926,838
Embankment Elevation (M)	2,065
TSF Volume (M^3)	112,295,491
Capacity of TSF (TONNES)	145,116,310
Starter Embankment Volume (M^3)	1,748,663
Starter Embankment Elevation (M)	1,997
Starter Embankment Capacity (TONNES)	4,397,860
Starter TSF and Embankment Footprint Area (M^2)	655,099
Starter TSF and Embankment Volume (M^3)	9,486,569
Starter TSF Volume (M^3)	6,737,900
Capacity of Emankment Less Starter Embankment (TONNES)	22,528,978
Total Capacity (TONNES)	172,043,149

FOR DISCUSSION PURPOSES ONLY

CLIENT: IDAHO GENERAL MINES, INC.

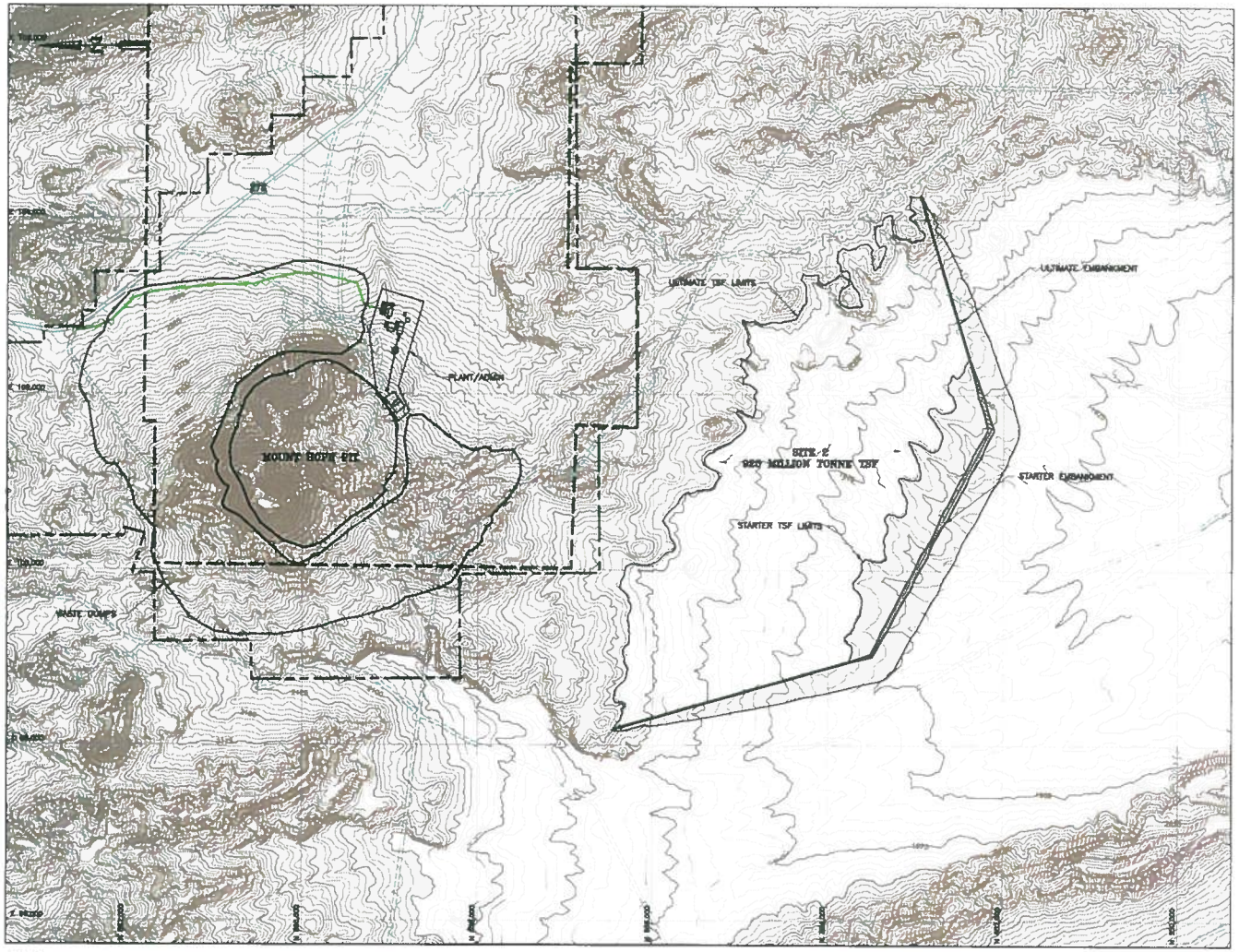
PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 1A

SWC
SMITH WILLIAMS CONSULTANTS, INC.
3435 West 38th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-6602 Fax: 303-433-6607

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	07/23/03

FILENAME	FIGURE No.	REV
1029F29	2	A



LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	15,732,418
Volume of TSF and Embankment (M^3)	775,089,715
Volume of Embankment (M^3)	110,899,716
Capacity of Embankment (TONNES)	177,439,546
Embankment Elevation (M)	2,050
TSF Volume (M^3)	674,101,271
Capacity of TSF (TONNES)	876,331,652
Starter Embankment Volume (M^3)	1,875,730
Starter Embankment Elevation (M)	1,963
Starter Embankment Capacity (TONNES)	3,001,168
Starter TSF and Embankment Footprint Area (M^2)	1,792,980
Starter TSF and Embankment Volume (M^3)	13,475,730
Starter TSF Volume (M^3)	11,600,000
Capacity of Embankment Less Starter Embankment (TONNES)	174,438,377
Total Capacity (TONNES)	1,050,770,029

FOR DISCUSSION PURPOSES ONLY

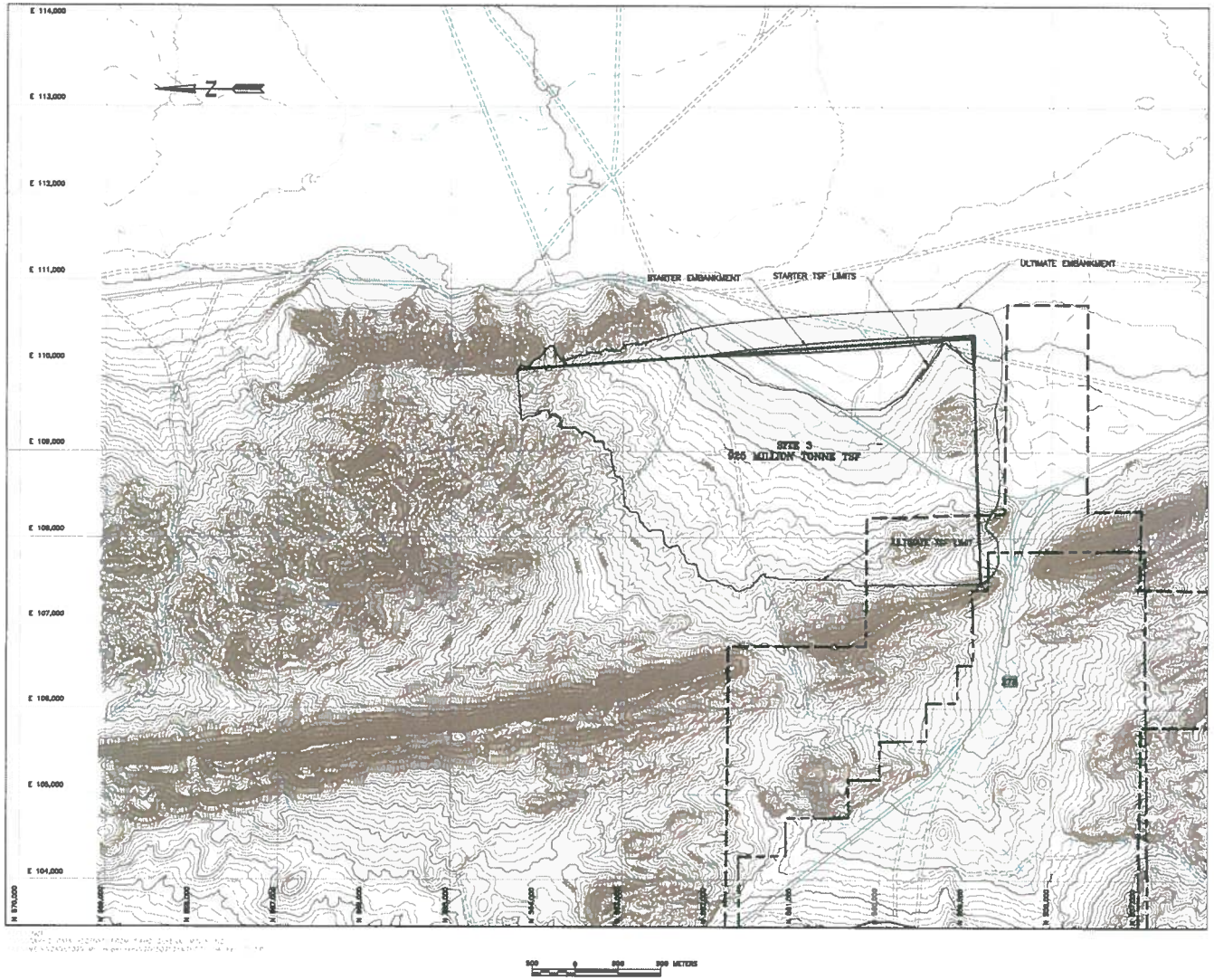
CLIENT: IDAHO GENERAL MINES, INC.

PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 2

SWC
SMITH WILLIAMS CONSULTANTS, INC.
2438 West 38th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-6262 Fax: 303-436-6962

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DB	APPROVED BY	RMS	07/23/05
FILENAME 1029F30		FIGURE No. 3	REV A	



LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	14,446,057
Volume of TSF and Embankment (M^3)	818,745,310
Volume of Embankment (M^3)	118,142,638
Capacity of Embankment (TONNES)	189,028,220
Embankment Elevation (M)	1,910
TSF Volume (M^3)	700,602,672
Capacity of TSF (TONNES)	909,865,791
Starter Embankment Volume (M^3)	2,346,164
Starter Embankment Elevation (M)	1,805
Starter Embankment Capacity (TONNES)	3,754,822
Starter TSF and Embankment Footprint Area (M^2)	1,604,267
Starter TSF and Embankment Volume (M^3)	12,927,674
Starter TSF Volume (M^3)	11,690,201
Capacity of Embankment Less Starter Embankment (TONNES)	185,273,398
Total Capacity (TONNES)	1,114,908,930

FOR DISCUSSION PURPOSES ONLY

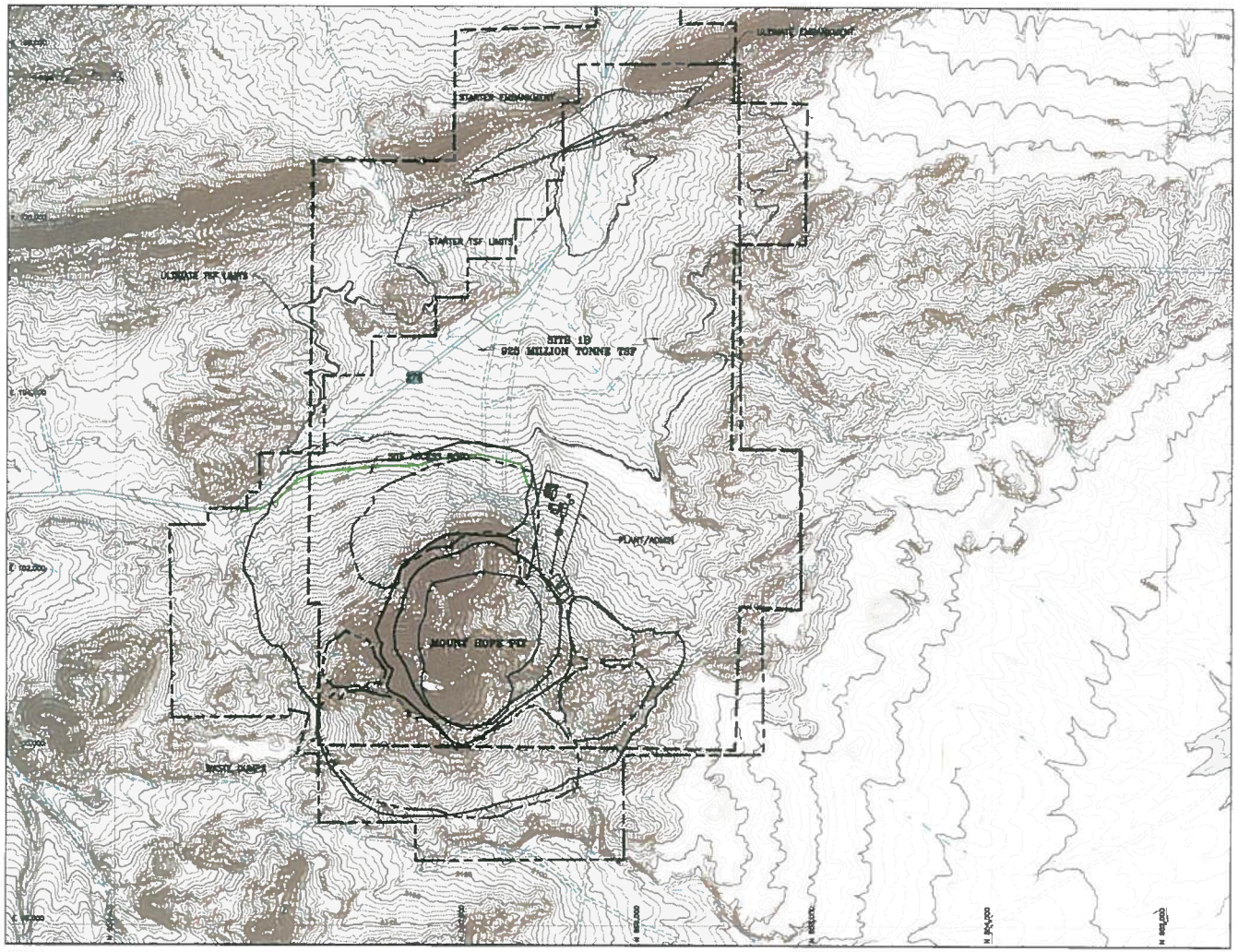
CLIENT: IDAHO GENERAL MINES, INC.

PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 3

SWC
SMITH WILLIAMS CONSULTANTS, INC.
2430 West 26th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-0222 Fax: 303-433-0223

DESIGNED BY	WWS	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	08/02/05
FILENAME 1029F31		FIGURE No. 4		REV A



SCALE = 1:25,000

LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL, FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	14,704,000
Volume of TSF and Embankment (M^3)	750,499,600
Volume of Embankment (M^3)	43,968,972
Capacity of Embankment (TONNES)	70,350,355
Embankment Elevation (M)	1,990
TSF Volume (M^3)	706,530,628
Capacity of TSF (TONNES)	918,489,816
Starter Embankment Volume (M^2)	988,700
Starter Embankment Elevation (M)	1,882
Starter Embankment Capacity (TONNES)	1,581,920
Starter TSF and Embankment Footprint Area (M^2)	1,041,550
Starter TSF and Embankment Volume (M^3)	12,557,700
Starter TSF Volume (M^3)	11,569,000
Capacity of Embankment Less Starter Embankment (TONNES)	68,768,435
Total Capacity (TONNES)	987,258,252

FOR DISCUSSION PURPOSES ONLY

CLIENT: IDAHO GENERAL MINES, INC.

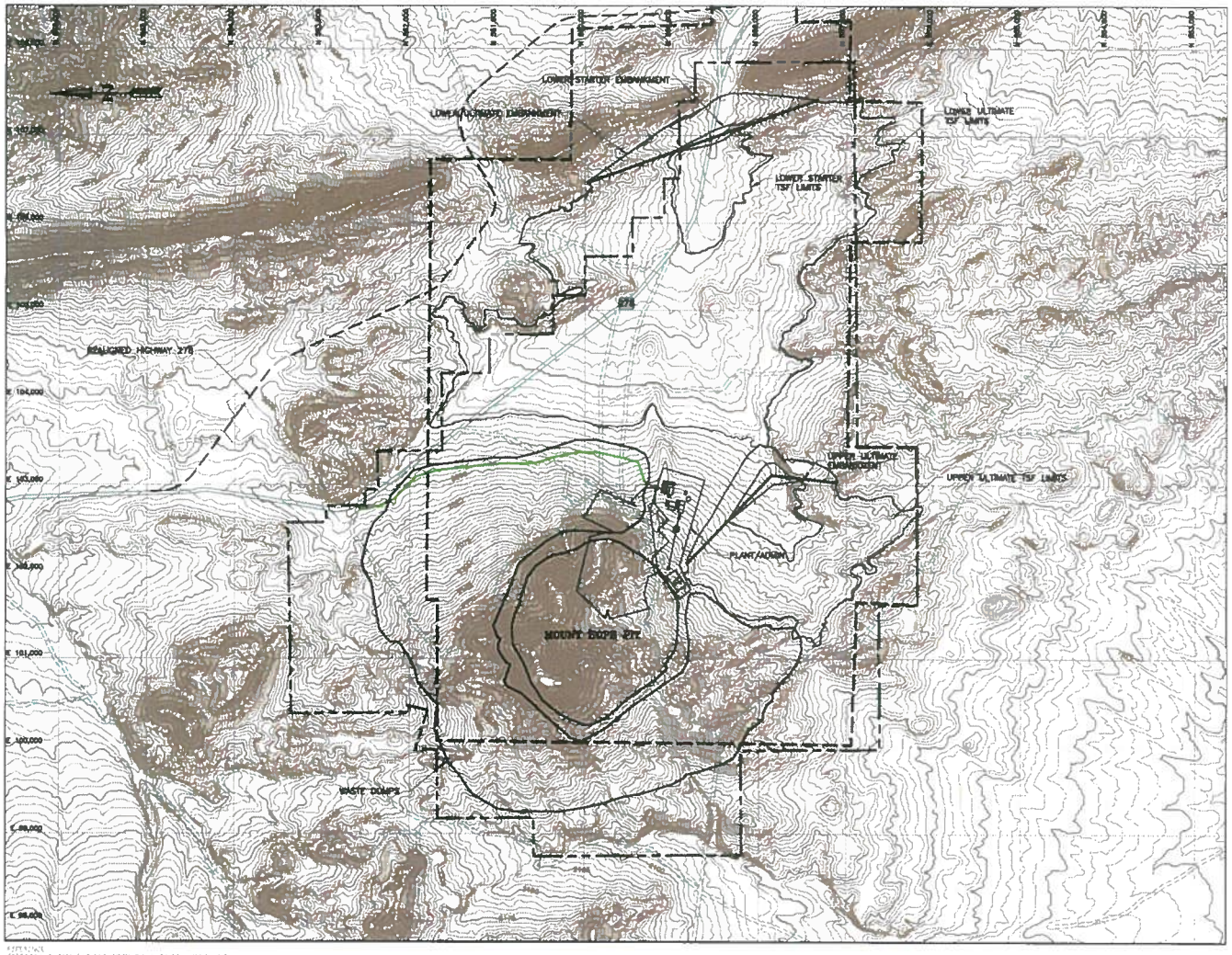
PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 1B

SWC
SMITH WILLIAMS CONSULTANTS, INC.
3420 West 38th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-0882 Fax: 303-433-0883

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	07/28/05

FILENAME	FIGURE No.	REV
1029F32	5	A



LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

LOWER TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	12,251,753
Volume of TSF and Embankment (M^3)	557,596,451
Volume of Embankment (M^3)	34,585,219
Capacity of Embankment (TONNES)	55,336,350
Embankment Elevation (M)	1,975
TSF Volume (M^3)	523,011,232
Capacity of TSF (TONNES)	679,914,602
Starter Embankment Volume (M^2)	988,700
Starter Embankment Elevation (M)	1,882
Starter Embankment Capacity (TONNES)	1,581,920
Starter TSF and Embankment Footprint Area (M^2)	1,041,550
Starter TSF and Embankment Volume (M^3)	12,557,700
Starter TSF Volume (M^3)	11,569,000
Capacity of Embankment Less Starter Embankment (TONNES)	53,754,430
Total Capacity (TONNES)	733,669,032

UPPER TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	4,146,600
Volume of TSF and Embankment (M^3)	128,457,205
Volume of Embankment (M^3)	16,829,273
Capacity of Embankment (TONNES)	26,926,838
Embankment Elevation (M)	2,065
TSF Volume (M^3)	112,295,491
Capacity of TSF (TONNES)	145,116,310
Starter Embankment Volume (M^3)	1,748,663
Starter Embankment Elevation (M)	1,997
Starter Embankment Capacity (TONNES)	4,397,860
Starter TSF and Embankment Footprint Area (M^2)	655,099
Starter TSF and Embankment Volume (M^3)	9,486,569
Starter TSF Volume (M^3)	6,737,900
Capacity of Emankment Less Starter Embankment (TONNES)	22,528,978
Total Capacity (TONNES)	172,043,149

FOR DISCUSSION PURPOSES ONLY

CLIENT: IDAHO GENERAL MINES, INC.

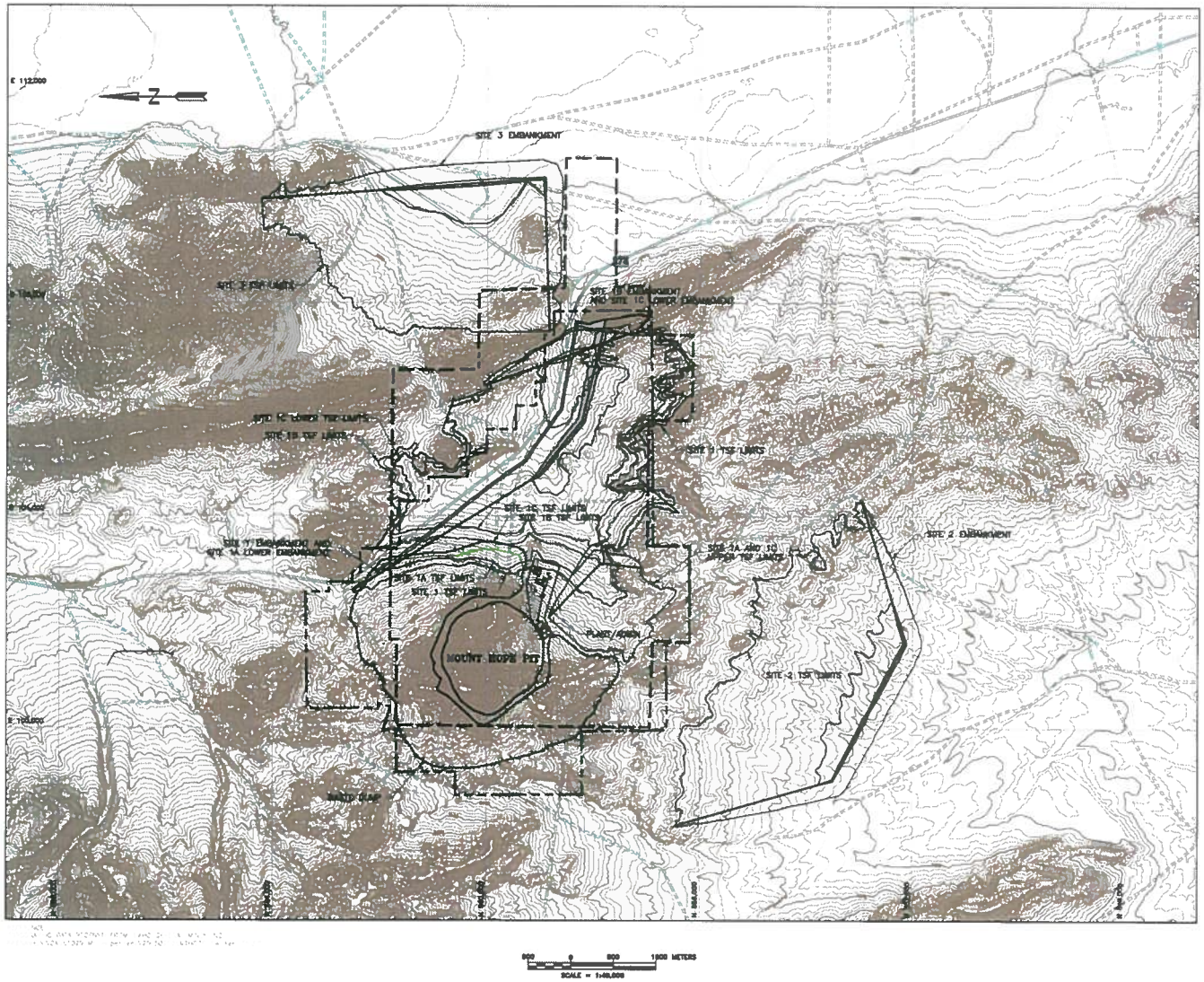
PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 1C

SWC
SMITH WILLIAMS CONSULTANTS, INC.
3438 West 38th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-6302 Fax: 303-433-6602

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	07/28/05

FILENAME	FIGURE No.	REV
1029F33	6	A



LEGEND:

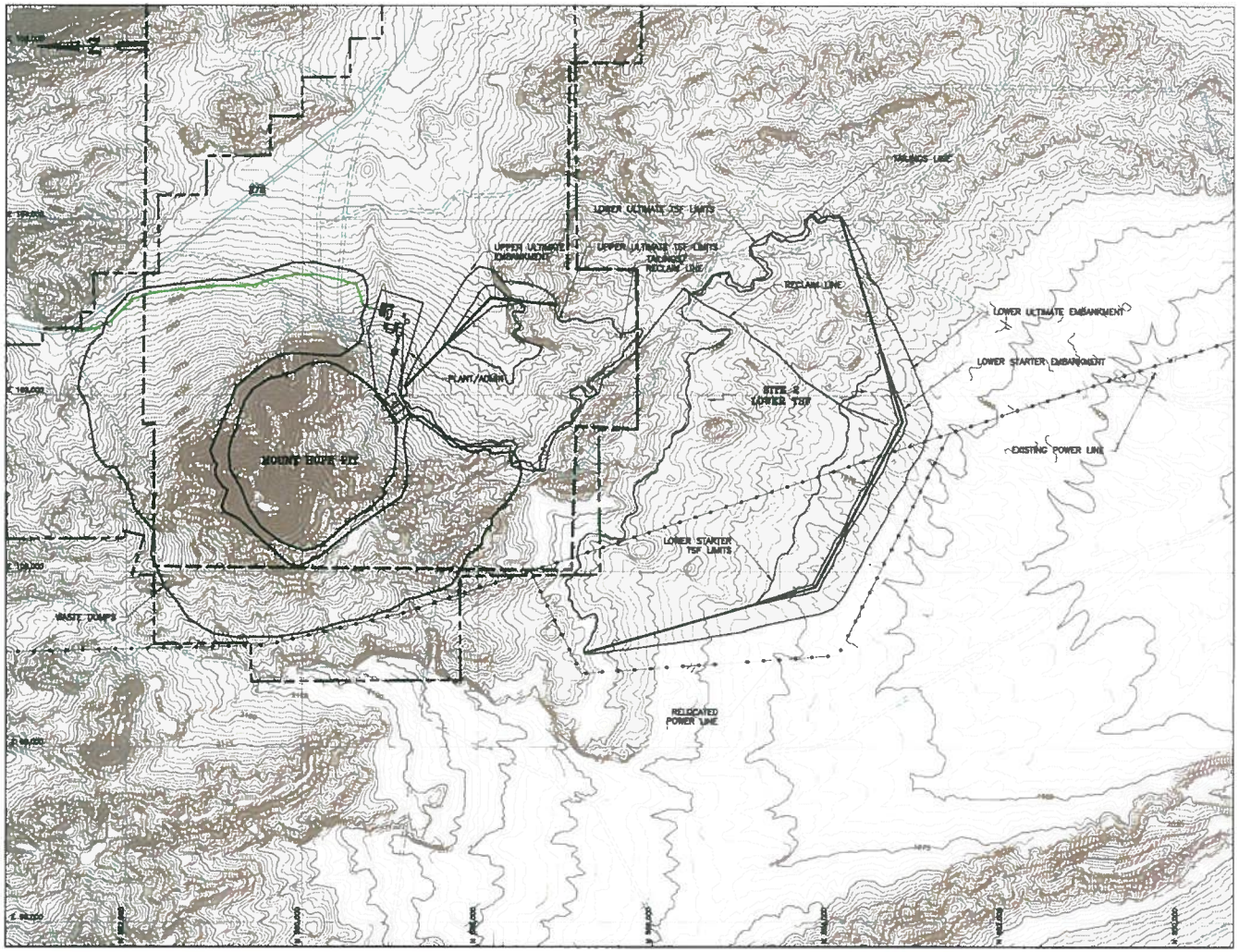
- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

FOR DISCUSSION PURPOSES ONLY

CLIENT	IDAHO GENERAL MINES, INC.
PROJECT	MOUNT HOPE FEASIBILITY STUDY PHASE II
TITLE	MOUNT HOPE TSF ALTERNATIVES 925 MILLION TONNE FACILITIES ALL SITES

SWC
SMITH WILLIAMS CONSULTANTS, INC.
3430 West 38th Avenue, Building D, Suite 110, Denver, CO 80211
Phone: 303-433-0667 Fax: 303-433-0667

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	07/23/05
FILENAME 1029F35		FIGURE No. 7		REV A



500 0 500 1000 METERS

LEGEND:

- EXISTING GROUND SURFACE CONTOUR AND EL. FEET
- EXISTING PAVED ROAD
- EXISTING UNPAVED ROAD
- EXISTING TRAIL
- STREAM OR DRAINAGE
- PROPERTY BOUNDARY
- BLM DISPOSAL BOUNDARY

UPPER TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	4,146,600
Volume of TSF and Embankment (M^3)	128,457,205
Volume of Embankment (M^3)	16,829,273
Capacity of Embankment (TONNES)	26,926,838
Embankment Elevation (M)	2,065
TSF Volume (M^3)	112,295,491
Capacity of TSF (TONNES)	145,116,310
Starter Embankment Volume (M^3)	1,748,663
Starter Embankment Elevation (M)	1,997
Starter Embankment Capacity (TONNES)	4,397,860
Starter TSF and Embankment Footprint Area (M^2)	855,099
Starter TSF and Embankment Volume (M^3)	9,486,569
Starter TSF Volume (M^3)	6,737,900
Capacity of Embankment Less Starter Embankment (TONNES)	22,528,978
Total Capacity (TONNES)	172,043,149

2A-LOWER TSF STATISTICS

TSF & Embankment Footprint Area (M^2)	9,911,689
Volume of TSF and Embankment (M^3)	54,088,511
Volume of Embankment (M^3)	88,229,374
Capacity of Embankment (TONNES)	141,166,999
Embankment Elevation (M)	2,070
TSF Volume (M^3)	466,035,344
Capacity of TSF (TONNES)	604,993,986
Starter Embankment Volume (M^3)	2,500,000
Starter Embankment Elevation (M)	1,985
Starter Embankment Capacity (TONNES)	4,000,000
Starter TSF and Embankment Footprint Area (M^2)	1,379,953
Starter TSF and Embankment Volume (M^3)	14,156,397
Starter TSF Volume (M^3)	11,656,397
Capacity of Embankment Less Starter Embankment (TONNES)	137,166,999
Total Capacity (TONNES)	742,160,985

FOR DISCUSSION PURPOSES ONLY

CLIENT: IDAHO GENERAL MINES, INC.

PROJECT: MOUNT HOPE FEASIBILITY STUDY PHASE II

TITLE: MOUNT HOPE TSF ALTERNATIVES
925 MILLION TONNE FACILITY
SITE 2A LOWER

SWC
SMITH WILLIAMS CONSULTANTS, INC.
3430 West 38th Avenue, Building D, Suite 115, Denver, CO 80211
Phone: 303-433-6557 Fax: 303-433-6883

DESIGNED BY	DTW	CHECKED BY	RLA	DATE
DRAWN BY	DS	APPROVED BY	RMS	07/28/05

FILENAME	FIGURE No.	REV
1029F36	8	A

APPENDIX C

EUREKA MOLY LLC
WATER RESOURCES MONITORING PLAN

Mount Hope Mine Project
Water Resources Monitoring Plan

1) This Water Resources Monitoring Plan (WRMOP) has been developed by Eureka Moly, LLC (EMLLC), in conjunction with the BLM, Eureka County and Nevada Department of Wildlife (NDOW). EMLLC proposes this WRMOP to provide a means to assess impacts to water resources from the Mt Hope Mine Project, currently the subject of an Environmental Impact Statement (EIS) being conducted in the Battle Mountain BLM Mount Lewis Field office (MLFO). As such, it is based on Mt Hope Mine potential impacts to BLM-administered resources as predicted by the groundwater modeling conducted to support the EIS. EMLLC may also have additional monitoring responsibilities associated with the Water Pollution Control Permit administered by Nevada Division of Environmental Protection, water rights administered by the Nevada Division of Water Resources (NDWR), or other permit or regulatory programs. This WRMOP is intended to accompany the Plan of Operations (POO) and only addresses the POO and EIS requirements as administered by BLM.

2) EMLLC will install newly proposed monitoring wells diligently upon receipt of the Record of Decision (ROD) and acknowledgment of cultural clearance of the locations by the Nevada State Historic Preservation Office and BLM. The intent is to provide for monitoring of baseline data from the new wells prior to changes induced by pumping or pit dewatering.

3) Mitigation of project-related impacts may be required by BLM (or NDWR) based on the degree of impact identified by the data collected under this WRMOP. Potential mitigation elements and thresholds are not discussed in this document.

4) Revisions to the monitoring program may be warranted in the future. This WRMOP is considered to be a living document that will be modified to accommodate changes in the hydrologic understanding of the area, data collected, advances in monitoring methodology, and other reasons as appropriate.

5) EMLLC will be responsible for collecting, managing, and reporting monitoring data. EMLLC may propose modifications to the WRMOP based on the data collected under this plan.

6) EMLLC will provide monitoring data collected under this WRMOP on an annual basis to BLM and members of the Technical Advisory Panel. A written annual report will be provided and a meeting will be scheduled during which EMLLC will present the annual report data.

7) A Technical Advisory Panel (TAP) is proposed to provide stakeholders with access to hydrologic monitoring data and to have a venue to bring forth their comments and concerns. TAP membership and member roles and responsibilities would be developed with BLM upon project approval.

8) Peak groundwater extraction rates of up to 11,300 acre-feet annually (afa) are proposed, with the majority of groundwater coming from the Kobeh Valley wellfield and the remainder coming from pit dewatering operations. Water flowing to the pit is anticipated to come from Kobeh Valley and Diamond Valley, with the majority from Diamond Valley. Based on predicted dewatering rates, the Diamond Valley withdrawal rate will be approximately 460 gpm (740 afa) near the end of mining. The groundwater extracted for mining use will be consumptively used in processing activities of the Project (i.e. no water will be returned to the aquifer).

9) As previously stated, the purpose of this Monitoring Plan is to identify and characterize changes to the hydrologic environment that could be caused by groundwater withdrawals for the Mt Hope Mine. It is recognized that impacts to water resources may occur from natural processes, non-project related water resource development, and land management practices, as well as from the Mt Hope mining operation.

10) Specific objectives of this WRMOP are to:
    - Confirm or improve the understanding of the hydro-geologic system.
    - Measure changes to surface water flows and groundwater levels caused by the groundwater withdrawals for the project.
    - Characterize impacts to streams, seeps and springs caused by the project.
    - Evaluate impacts to vegetation and/or wildlife habitat caused by the project.
    - Support periodic updates to the hydrologic model to improve the predictive quality of the model.
    - Provide an early warning capability to detect adverse impacts before they become unmanageable

11) Monitoring elements include measuring water extraction, surface water (streams and springs) flow, groundwater elevations, health and trends of wetland, riparian and phreatophyte vegetative communities, water quality, and meteorological data. Pre-development data will be collected to provide a baseline against which to assess data collected after the project pumping begins.

12) Monitoring locations, parameters, and frequencies have been selected to facilitate identification and assessment of impacts. Thus, an overview of the predicted impacts is warranted:
    - Significant ground water consumption in Kobeh Valley is expected to remove water from storage and lower groundwater elevations in portions of Kobeh Valley.
    - Reduction of spring or surface water flows in portions of Kobeh Valley is possible as a result of the lowered groundwater levels.
    - Groundwater drawdown in the extreme western portion of Diamond Valley, in the vicinity of Tyrone Gap, is predicted to occur as the open pit extends below the water table.

- Predicted impacts to groundwater in Diamond Valley are minimal. Current data suggests that the hydrologic interconnection between Kobeh Valley and Diamond Valley is limited. Historical data document a significant reduction in water levels in Diamond Valley due to extensive agricultural uses of groundwater.
- As the cone of groundwater depression propagates to the north from the well field or to the north and northwest from the pit area, it could encroach upon the southernmost or south-easternmost portions of the Roberts Mountains. This could result in reduction of spring or surface water flows or lowering of shallow groundwater tables that support wet meadow complexes and associated wildlife habitat in these areas.
- Water rights within the cone of depression could be affected: Appropriated surface waters could experience diminished flows. Appropriated groundwater could experience groundwater elevation declines which could impact well efficiencies or pumping costs.
- Ground subsidence and development of fissures at the ground surface could occur due to removal of interstitial water from a substantial volume of alluvial sediments in Kobeh Valley.
- In general, the potential for impacts increases both with proximity of a given resource to the proposed well field and with increased duration of pumping.
- Figures 1 and 2 depict the area that is predicted to experience groundwater drawdown in excess of ten feet at 44 years following project start-up. Figures 1 and 2 also show monitoring locations selected for the WRMOP.

13) Data collection completed by EMLLC will be used by EMLLC to assist in defining baseline conditions. EMLLC has also collected and compiled available water resources data and information in Kobeh Valley, Diamond Valley, Pine Valley, and surrounding areas, including data collected by Eureka County, the USGS, and the NDWR. This information includes location of existing supply and monitoring wells, groundwater extraction rates, groundwater level measurements, flow rates at springs and streams, water quality, and precipitation data.

14) To provide appropriate coverage of the potentially affected area, EMLLC will construct 14 new monitoring wells and observe their water levels on a daily basis utilizing down-hole transducers and data loggers. The preliminary proposed location of these wells is shown on Figures 1 and 2; actual locations may be adjusted in consultation with the BLM, NDWR, and/or TAP. These wells are generally near the extent of the area predicted to experience drawdown in excess of ten feet at Project Year 44, and will provide a sentinel function.

15) As part of the wellfield construction, it is anticipated that a test well would be drilled near each planned production well location. The test wells would be converted to monitoring wells and equipped with down-hole transducers and data loggers for continuous monitoring. The anticipated test well/monitor well locations are within the well field corridor as shown on Figures 1 and 2.

16) In addition to collecting data, EMLLC will compile data collected by USGS, NDWR and Eureka County that is made publicly available and use this data to refine and calibrate the numeric model. EMLLC will incorporate data from the monitoring sites shown on Figures 1 and 2, provided that these data continue to be collected and made available by USGS and NDWR. Eleven USGS sites are considered to provide important coverage, and EMLLC will monitor these locations if USGS discontinues this monitoring (see Figures 1 and 2, and Table 1).

17) As provided in Figure 1, EMLLC will provide for the monitoring of flows in

- Steiner Creek in southeast Grass Valley, west of Kobeh Valley
- Pine Creek in southern Monitor Valley, south of Kobeh Valley; and
- Allison Creek in Antelope Valley, south of Kobeh Valley.

These regional streams will serve as analogs to provide improved understanding of seasonal or regional conditions that may be impacting the flows in perennial streams. Stage- flow relationships will be established at these locations and the streams will then be equipped with pressure transducers to allow continuous measurement.

18) The information collected pursuant to this WRMOP will be entered by EMLLC into a project database on a regular basis, once it has been checked for laboratory quality control and quality assurance procedures, generally reflecting the monitoring interval.

19) EMLLC has developed a numeric model to simulate the groundwater flow system and the model will be updated to incorporate the data collected for this WRMOP. EMLLC will update the model after recovering 6 months of post-operational monitoring data. Thereafter, EMLLC will update the model on a schedule to reflect the requirements of the BLM.

20) EMLLC will analyze water chemistry to assist in evaluating water source contributions for the specific monitoring locations.

21) EMLLC will implement documented quality assurance and quality control procedures. Monitoring data will be recorded using a standardized (NDEP-compliant) protocol and format for each monitoring event. Protocols will be submitted to BLM for approval. It is anticipated that protocols will be based on those described by Rantz and others (1982) for surface water flow monitoring, Lapham and others (1995) for groundwater level monitoring, and Wilde (2005) for water sampling. Laboratory analyses will be conducted by Nevada-certified laboratories using standard laboratory quality control procedures.

22) EMLLC will survey production wells, monitoring wells and surface water locations to establish ground surface and measuring point elevations.

23) Tables 1 and 2, provided at the end of this document, lists the proposed monitoring site locations, type of monitoring, monitoring frequency and a brief rationale for selecting

each location, Wells identified in Table 1 include both existing wells and wells that EMLLC proposes to construct upon project approval. Some wells are located within pit limits that would be mined out as the project advances, and these locations would be dropped from the monitoring plan at that time. Site locations are shown on the attached figures. The monitoring sites in Tables 1 and 2 are organized by locations corresponding to those shown on the attached figures. The monitoring sites were selected in consideration of the type of data to be collected and the potential impact they are designed to evaluate and assess, as described below.

a. Production Wells: Extraction rates and groundwater levels will be measured continuously (daily readings following an initial period of hourly readings) in production wells.

b. Monitor Wells: Monitoring wells provided in Figure 1 and 2, and as amended in the future under this plan will be monitored to determine depth to groundwater, according to the frequency provided in Table 1. This data is anticipated to assist in characterizing the extent of drawdown within the well field and open pit areas and the propagation of the drawdown away from those areas. Transducers will be placed in the new monitoring wells to provide for continuous monitoring (daily readings following an initial period of hourly readings). It is recognized that the data collection frequency may be adjusted at BLM's direction

c. Surface Waters: Selected springs and surface flow sites in Kobeh Valley, Diamond Valley, and Pine Valley will be monitored to determine flow rates. Continuous flow recording devices will be installed at Roberts Creek, Pete Hanson Creek, Birch Creek, South Fork of Henderson Creek, Vinini Creek, and Tonkin Springs. For low flow conditions or where flow is diffuse on the ground surface, flow measurements may not be practicable, and flow would be estimated.

   Site selection for surface water flow monitoring seeks to generally measure flow within perennial reaches, while considering aspects such as accessibility and channel morphology. At each site, flows and depths will be measured monthly to establish a stage-flow relationship. Pressure transducers will be installed for hourly measurement of head, which will be converted to flow via the stage-flow relations.

d. Baseline chemistry analyses will be completed at all water monitoring sites provided within this plan. Future water chemistry analyses will be conducted as warranted. The suite of baseline parameters will consist of NDEP Profile II constituents plus isotopes of oxygen and hydrogen.

e. Vegetation monitoring will be conducted on transects to represent four wet meadow complexes in the Roberts Mountains to measure species composition, species richness, and plant cover. Minimal impact (hand-augered) monitoring wells or other field assessment will be conducted to identify the source of water

that supplies these meadows. The four wet meadow complexes include a pair relatively close to the open pit and well field, and a pair outside of the predicted area of drawdown.

Vegetation monitoring will also be conducted at representative transects in the lower portions of Kobeh Valley and in the lower portions of Roberts Creek. Vegetation monitoring will also be conducted in the Roberts Mountains to augment the larger-scale remote-sensing monitoring described in subsection "f" below.

f. Remote sensing will be conducted to assess vegetation distribution in the Roberts Mountains. The remote sensing will allow the relatively large areas to be monitored economically, provide a more extensive monitoring data set and reduce potential observer bias.

g. Precipitation data will be collected hourly at the existing meteorological station located at Mt Hope. High altitude precipitation storage and measuring sites will be established in the Roberts Mountains, to help in understanding the relationship between precipitation and elevation in this area. Regional data from BLM or NOAA stations will also be evaluated periodically to better define regional and local meteorological inputs.

h. Macroinvertebrate monitoring will be conducted in Roberts Creek, Henderson Creek and Vinini Creek to provide an indication of the ecological health of these streams.

i. Subsidence monitoring will be conducted in Kobeh Valley to measure ground subsidence in response to production water pumping, identify the formation of any fissures caused by pumping, and quantify the rate of growth of any fissures that develop from pumping.

REFERENCES

Lapham, W.W., Wilde, F.D., and Koterba, M.T., 1995, *Ground-water data collection protocols and procedures for the National Water-Quality Assessment Program: Selection, installation, and documentation of wells, and collection of related data:* U.S. Geological Survey Open-File Report 95-398, 70 p.

Rantz, S.E., et al., 1982. *Measurement and computation of streamflow,* U.S. Geological Survey Water Supply Paper 2175, Volumes 1 and 2, 631 p.

Wilde, F.D., 2005, *National field manual for the collection of water-quality data:* Book 9, Handbooks for Water-Resources Investigations, U.S. Department of the Interior and the U.S. Geological Survey.

Table 1 – Hydrologic Monitoring

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
Diamond Valley Groundwater	GMI-PDT-1	Depth to Water	Continuous	Vinini hornfels	Pit area groundwater drawdown monitoring
	GMI-PDT-2	Depth to Water	Continuous	Vinini and hornfels	Pit area groundwater drawdown monitoring
	GMI-PDT-3B	Depth to Water	Continuous	Vinini Hornfels	Pit area groundwater drawdown monitoring
	IGMI-152	Depth to Water	Continuous	Vinini Fm	Pit area groundwater drawdown monitoring
	IGMI-155	Depth to Water	Continuous	Qtz Porphyry	Pit area groundwater drawdown monitoring
	IGMI-156	Depth to Water	Continuous	Vinini Fm	Pit area groundwater drawdown monitoring
	IGMI-157	Depth to Water	Continuous	Vinini Fm	Pit area groundwater drawdown monitoring
	IGM-169	Depth to Water	Continuous	Vinini Hornfels	Pit area groundwater drawdown monitoring
	IGMI-226P	Depth to Water	Continuous	Vinini Fm	Pit area groundwater drawdown monitoring
	IGMI-228P	Depth to Water	Continuous	Vinini Fm	Pit area groundwater drawdown monitoring
	IGMI-230P	Depth to Water	Continuous	Tuff	Pit area groundwater drawdown monitoring
	IGMI-232P	Depth to Water	Continuous	Vinini Fm	Pit area groundwater drawdown monitoring
	IGMI-233P	Depth to Water	Continuous	Tuff	Pit area groundwater drawdown monitoring
	IGMI-MH-248	Depth to Water	Continuous	Bedrock	Pit area groundwater drawdown monitoring
	NDWR-15462	Depth to Water	Continuous	Alluvium	Pit area groundwater drawdown monitoring
	MH-300	Depth to Water	Continuous	Alluvium	Monitoring groundwater gradient changes in Tyrone Gap with MH –

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
Diamond Valley Groundwater					301
	MH-301	Depth to Water	Continuous	Alluvium	Monitoring groundwater gradient changes in Tyrone Gap with MH – 300
	MH-302	Depth to Water	Continuous	Alluvium	Monitor influence of potential increased transmissivity zone through Whistler Range.
	MH-303	Depth to Water	Continuous	Alluvium	Monitor groundwater elevation trend on west side of Diamond Valley; Sentinel well.
	MH-304	Depth to Water	Continuous	Alluvium	Monitor groundwater elevation trend on west side of Diamond Valley; Sentinel well.
	MH-305	Depth to Water	Continuous	Alluvium	Monitor drawdown east of pit.
	IGMI-158	Depth to Water	Continuous	Alluvium	Monitor groundwater elevation trend on west side of Diamond Valley; Sentinel well.
	IGMI - 236P	Depth to Water	Continuous	Vinini Fm	Monitor groundwater elevation change in Whistler Range; Sentinel well.
	Romano Well	Depth to Water	Continuous	Vinini Fm	Monitor groundwater elevation trend on west side of Diamond Valley; Sentinel well.
	MH – 306 (153 N21 E52 10AAAC1)	Depth to Water	Continuous		Monitor groundwater elevation trend on west side of Diamond Valley
	MH – 307 (153 N20 E52 26AABC1)	Depth to Water	Continuous		Monitor groundwater elevation changes in Devil's Gate.
	MH – 308 (153 N20 E52 26AABC2)	Depth to Water	Continuous		Monitor groundwater elevation changes in Devil's Gate.
Diamond Valley Springs	KV-059 (Stinking)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	KV-060 (Hash)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
	KV-061 (Railroad)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	KV-062 (Trap Corral)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	DV -065 (Shipley)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	SP-1 (McBride)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	SP-2 (Garden pass)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	SP-3 (unnamed)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	SP-4 (Mt Hope)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	SP-7 (unnamed)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
Kobeh Valley Groundwater	All production wells	Flow and Depth to Water	Continuous	Alluvium and carbonate	Measure well field production, individual well response to pumping stress, and drawdown progression in wellfield
	GMI-RWX-228T	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	GMI-RWX-229	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	RWX -205	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH-400	Depth to Water	Continuous	Alluvium	Monitor groundwater elevation change in alluvium on west side of Whistlers paired w/ MH-401 to assess connection between alluvium and bedrock aquifers; assess effect of inferred structure located to the east.
	MH-401	Depth to Water	Continuous	Bedrock	Monitor groundwater elevation

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
Kobeh Valley Groundwater					change in bedrock on west side of Whistlers paired w/ MH-400 to assess connection between alluvium and bedrock aquifers; assess effect of inferred structure located to the west.
	MH-402	Depth to Water	Continuous	Alluvium	Monitor drawdown at east edge of Kobeh Valley.
	MH-403	Depth to Water	Continuous	Alluvium	Monitor potential drawdown in upper Roberts Creek; Sentinel.
	MH-404	Depth to Water	Continuous	Bedrock	Monitor potential drawdown in western part of Robert's Creek watershed; Sentinel.
	MH – 405	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 406	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 407	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 408	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 409	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 410	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 411	Depth to Water	Continuous	Alluvium	Measure drawdown progression in wellfield
	MH – 412	Depth to Water	Continuous	Alluvium	Monitor groundwater elevation change in transition zone between wellfield and pit area
	MH- 413	Depth to Water	Continuous	Alluvium	Monitor groundwater elevation change in transition zone between wellfield and pit area

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
	MH - 414 (139 N21 E49 25BBDA)	Depth to Water	Continuous	Alluvium	Monitoring of west side of KV wellfield drawdown
	MH - 415 (139 N21 E50 17BACC)	Depth to Water	Continuous	Alluvium	Monitoring of west side of KV wellfield drawdown
	MH - 416 (139 N20 E51 05CBCC)	Depth to Water	Continuous	Alluvium	Monitoring of south side of KV wellfield drawdown
	MH - 417 (139 N21 E51 36DCDB1)	Depth to Water	Continuous	Alluvium	Monitoring of southeast side of KV wellfield drawdown
	MH -418 (139 N21 E51 24DDDB1)	Depth to Water	Continuous	Alluvium	Monitoring of southeast side of KV wellfield drawdown
	MH – 419 (139 N20 E49 23ACCB1)	Depth to Water	Continuous	Alluvium	Monitoring of drawdown between wellfield and Bean Flat phreatophytes
	MH – 420 (139 N20 E49 24ACAB)	Depth to Water	Continuous	Alluvium	Monitoring of drawdown between wellfield and Bean Flat phreatophytes
	MH – 421	Depth to Water	Continuous	Alluvium	Monitoring of west side of KV wellfield drawdown
	RWX - 209 shallow and deep	Depth to Water	Continuous	Alluvium /Vinini	Monitoring of northwest side of KV wellfield drawdown
	MRCMW	Depth to Water	Continuous	Alluvium	Monitoring of potential drawdown in Roberts Creek watershed
	LRCMW	Depth to Water	Continuous	Alluvium	Monitoring of potential drawdown in Roberts Creek watershed
	IGM-154,	Depth to Water	Continuous	Alluvium	Pit area groundwater monitoring
	IGMI-234P	DTW and Chemistry	Continuous	Alluvium	Monitor groundwater elevation change in Whistler Range; Sentinel well.
	IGMI-235P	DTW and Chemistry	Continuous	Vinini Fm	Monitor groundwater elevation change in Whistler Range; Sentinel well.
	IGMI-237P	DTW and	Continuous	Vinini Fm	Monitor groundwater elevation

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
		Chemistry			change in Whistler Range; Sentinel well.
	TM1-B	DTW and Chemistry	Continuous	Alluvium	Monitoring of east side of KV wellfield drawdown
	Atlas 1	DTW/ pressure	Continuous	Alluvium	Monitoring northwest of predicted 10 foot drawdown contour
	Bartine Ranch Well 1, 2, 3 (flowing)	DTW/pressure	Continuous	Alluvium	Assess impact of pumping on artesian flows outside predicted 10 foot drawdown contour
	Big Windmill	DTW/pressure	Continuous	Alluvium	Monitor groundwater elevation change in transition zone between wellfield and pit area
	Colby well	DTW/pressure	Continuous	Alluvium	Assess impact of pumping on artesian flows outside predicted 10 foot drawdown contour
	KV 064	DTW/pressure	Continuous	Alluvium	Assess impact of pumping on artesian flows outside predicted 10 foot drawdown contour
	Depco INC;	DTW/pressure	Continuous	Alluvium	Monitoring of drawdown between wellfield and Bean Flat phreatophytes
	Etcheverry Windmill	DTW/pressure	Continuous	Alluvium	Monitoring of west side of KV wellfield drawdown
	IGMI-MH-RWX-203 T	DTW/pressure	Continuous	Alluvium	Monitor groundwater elevation change in transition zone between wellfield and pit area
	NDWR9211R	DTW/pressure	Continuous	Alluvium	Assess impact of pumping on artesian flows outside predicted 10 foot drawdown contour
	RWX- 204	DTW/pressure	Continuous	Alluvium	Monitor groundwater elevation change in transition zone between wellfield and pit area
	KFE	DTW/pressure	Continuous	Alluvium	Monitor groundwater elevation change in transition zone between

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
					wellfield and pit area
	KFW	DTW/pressure	Continuous	Alluvium	Monitoring northwest of predicted 10 foot drawdown contour
	Treasure Well	DTW/pressure	Continuous	Alluvium	Assess impact of pumping on artesian flows outside predicted 10 foot drawdown contour
	GMI-RWX-223	DTW/pressure	Continuous	Alluvium	Measure drawdown progression in wellfield
Kobeh Valley Streams	LRC (Lower Roberts Creek)	Flow Rate; Water Quality	Continuous		Potential indirect impacts to perennial streams
	URC (Upper Roberts Creek)	Flow Rate; Water Quality	Continuous		Potential indirect impacts to perennial streams
	MH 700 (Cottonwood Canyon)	Flow	Continuous		Potential indirect impacts to perennial streams
	MH 701 (Cottonwood Canyon)	Flow	Continuous		Potential indirect impacts to perennial streams
Kobeh Valley Springs	KV-002 (Potato Canyon)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	KV-026 (Rutabega)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts near wellfield
	KV-034 (Mud)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts near wellfield
	KV-035 (Lone Mtn)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts south of wellfield
	KV-044 (Hot)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	KV-015 (Unnamed)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	KV-016 (Unnamed)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	KV-020 (Unnamed)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	OT-6 (Unnamed)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
	OT-7 (Nichols Spring)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	MH - 702 (Jack Spring)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts, west side of Roberts Mtn.
	MH – 703 (Klobe Spring)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts in Antelope Valley
Pine Valley Springs	PV-059 (Dry Creek headwater spring)	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	PV-060	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	PV-061	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	PV-062	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	PV-063	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	PV-064	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	PV-065	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
Pine Valley Springs	OT-2	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	OT-3	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	OT-5	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	OT-10A	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
	OT-11	Flow, Photograph	Quarterly		Monitor potential indirect spring impacts
Pine Valley Streams	LBC (Lower Birch Cr.)	Flow Rate	Continuous		Potential indirect impacts to perennial streams
	LHC (Lower Henderson	Flow Rate	Continuous		Potential indirect impacts to

Area	Site Name(s)	Parameters	Frequency	Formation	Rationale
	Cr.)				perennial streams.
	UHC (Upper Henderson Cr.)	Flow Rate	Continuous		Potential indirect impacts to perennial streams
	LPHC (Lower Pete Hanson Cr.)	Flow Rate	Continuous		Potential indirect impacts to perennial streams.
	UPHC (Upper Pete Hanson Cr.)	Flow Rate	Continuous		Potential indirect impacts to perennial streams.
	Tonkin Springs	Flow Rate	Continuous		Potential indirect impacts to perennial streams
	LVC (Lower Vinini)	Flow Rate	Continuous		Potential indirect impacts to perennial streams.
	UVC (Upper Vinini Cr.	Flow Rate	Continuous		Potential indirect impacts to perennial streams.
	WC (Willow Cr.)	Flow Rate	Continuous		Potential indirect impacts to perennial streams.
Pine Valley Groundwater	MH-500	Depth to Water	Continuous	Bedrock	Sentinel well in mountain block south of Henderson Creek
	MH-501	Depth to Water	Continuous	Alluvium	Henderson Creek groundwater elevations
	MH-502	Depth to Water	Continuous	Bedrock	Sentinel well in mountain block east of springs in upper Henderson Creek

Table 2 - Biological and Meteorological Monitoring

Area	Site Name(s)	Parameters	Frequency
Wet Meadow Complexes in Roberts Mountains	Three to five vegetation transects in each of the WMC, locations to be determined;	Species composition, species richness, and plant cover.	Semi-Annually (May and July)
Phreatophytic vegetation in lower Kobeh Valley	Three to five vegetation transects in each of the phreatophyte vegetation communities, locations to be determined;	Species composition, species richness, and plant cover.	Transects - Semi-Annually (April and June);
Phreatophytic and riparian vegetation in lower Roberts Creek	Three to five vegetation transects in the watershed, locations to be determined	Species composition, species richness, and plant cover.	Transects - Semi-Annually (April; June);
Phreatophytic and riparian vegetation in Henderson Creek	Three to five vegetation transects in the watershed, locations to be determined	Species composition, species richness, and plant cover.	Transects - Semi-Annually (April; June);
Roberts Mountain	Not applicable	Remote sensing (Aerial photography or satellite imagery)	Initially for entire mountain; Every two years for riparian areas.
Streams in Roberts Mountains.	Roberts Creek, Vinini Creek, Henderson Creek	Macro-invertebrate monitoring	Annually (late summer/early fall base flow)
Mine site	Existing Mt Hope met station	Temperature, precipitation, humidity, wind speed and wind direction	Hourly
Roberts Mountains	Minimum of 3 high-altitude sites in Roberts Mountains, locations to be determined.	Precipitation	To be determined

053 Pine Valley

153 Diamond Valley

Detailed Labeling of Monitoring Sites Within This Area Depicted in Figure 2

138 Grass Valley

Steiner Creek

139 Kobeh Valley

152 Stevens Basin

MH-703 (Klobe Hot Spring)

B Big Smoky Valley

Allison Creek

LANDER COUNTY

EUREKA COUNTY

151 Antelope Valley

NYE COUNTY

140A Monitor Valley

140B Monitor Valley

150 Little Fish Lake Valley

Pine Creek

Explanation

Roberts Mountains Monitoring Sites
- Stream
- Gauging Station
- Monitoring Well
- Spring

Diamond Valley Monitoring Sites
- Spring
- Monitoring Well

Kobeh Valley Monitoring Sites
- Stream
- Monitoring Well
- Spring

Wells to be Installed by EMLLC
- DV Well
- KV Well
- PV Well

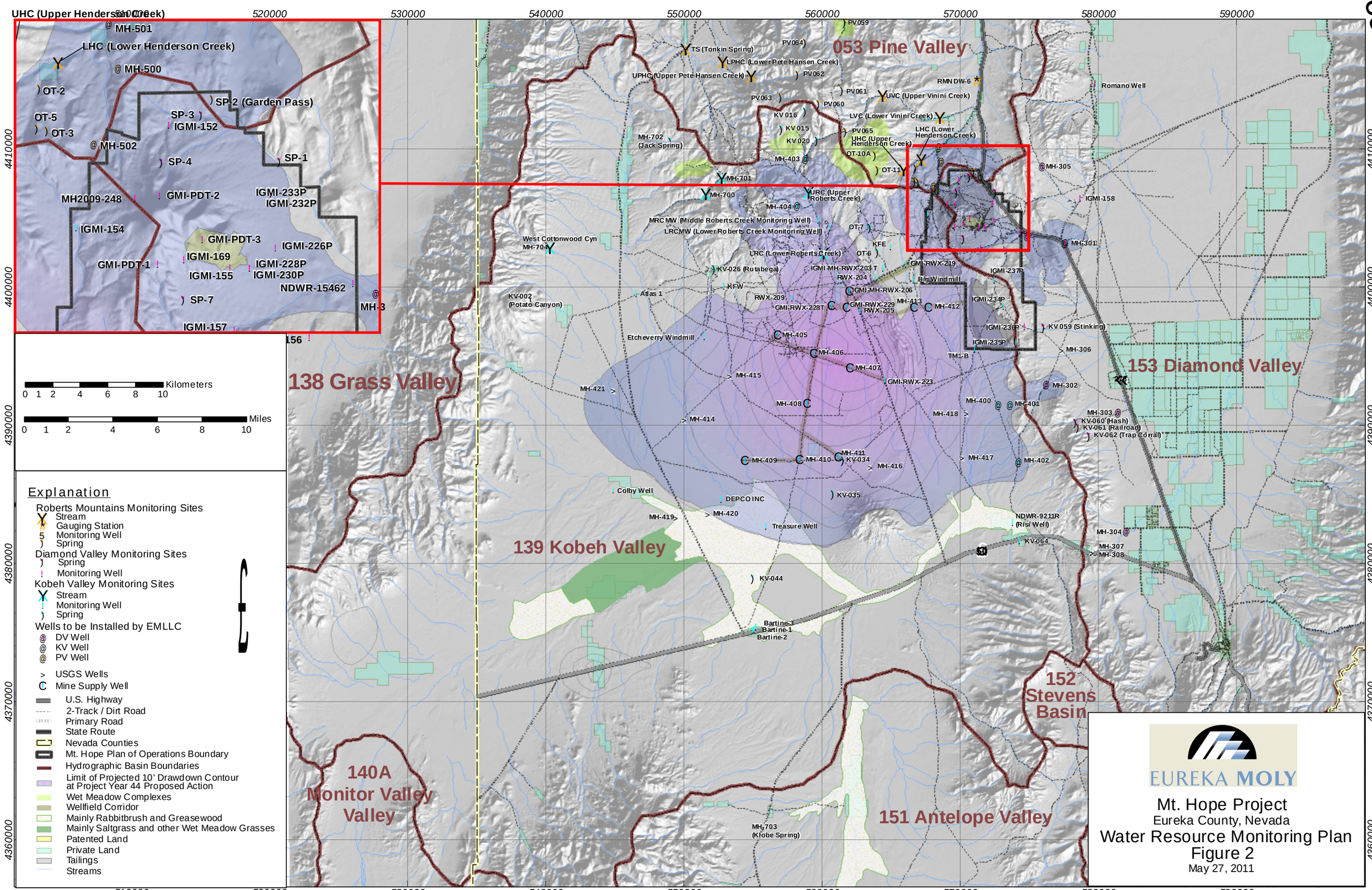
- USGS Wells
- Mine Supply Well

Regional Monitoring Sites
- Spring
- Stream

- Perrenial Streams Occupied by Lahontan Cutthroat Trout
- U.S. Highway
- 2-Track / Dirt Road
- Primary Road
- State Route
- Nevada Counties
- Mt. Hope Plan of Operations Boundary
- Hydrographic Basin Boundaries
- Limit of Projected 10' Drawdown Contour at Project Year 44 Proposed Action
- Wet Meadow Complexes
- Wellfield Corridor
- Mainly Rabbitbrush and Greasewood
- Mainly Saltgrass and other Wet Meadow Grasses
- Patented Land
- Private Land
- Tailings
- Streams

EUREKA MOLY

Mt. Hope Project
Eureka County, Nevada
Water Resource Monitoring Plan
Figure 1
May 27, 2011


UHC (Upper Henderson Creek)
MH-501
LHC (Lower Henderson Creek)
MH-500
OT-2
SP-2 (Garden Pass)
OT-5
OT-3
SP-3
IGMI-152
MH-502
SP-4
SP-1
MH2009-248
GMI-PDT-2
IGMI-233P
IGMI-232P
IGMI-154
GMI-PDT-3
IGMI-226P
IGMI-169
GMI-PDT-1
IGMI-228P
IGMI-155
IGMI-230P
NDWR-15462
SP-7
IGMI-157
138 Grass Valley
053 Pine Valley
153 Diamond Valley
139 Kobeh Valley
152 Stevens Basin
140A Monitor Valley Valley
151 Antelope Valley
TS (Tonkin Spring)
LPHC (Lower Pete Hansen Creek)
UPHC (Upper Pete Hansen Creek)
PV059
PV064
PV062
PV061
PV063
PV060
UVC (Upper Vinini Creek)
RMN DW-6
Romano Well
KV 016
LVC (Lower Vinini Creek)
KV 015
PV065
KV 020
UHC (Upper Henderson Creek)
LHC (Lower Henderson Creek)
MH-702 (Jack Spring)
OT-10A
MH-403
OT-11
MH-305
MH-701
MH-700
URC (Upper Roberts Creek)
MH-404
IGMI-158
MRC MW (Middle Roberts Creek Monitoring Well)
LRCMW (Lower Roberts Creek Monitoring Well)
OT-7
West Cottonwood Cyn MH-704
KFE
MH-301
LRC (Lower Roberts Creek)
OT-6
KV-026 (Rutabega)
IGMI-MH-RWX-203 T
GMI-RWX-219
IGMI-237P
RWX-204
Big Windmill
KFW
IGMI-MH-RWX-206
Atlas 1
KV-002 (Potato Canyon)
RWX-209
MH-413
IGMI-234P
GMI-RWX-228T
GMI-RWX-229
RWX-205
MH-412
IGMI-236P
KV 059 (Stinking)
Etcheverry Windmill
MH-405
IGMI-235P
MH-406
MH-306
TM1-B
MH-407
MH-415
GMI-RWX-223
MH-302
MH-421
MH-408
MH-400
MH-401
MH-418
MH-414
MH-303
KV-060 (Hash)
KV-061 (Railroad)
KV-062 (Trap Corral)
MH-409
MH-410
MH-411
KV-034
MH-416
MH-417
MH-402
Colby Well
DEPCO INC
KV-035
MH-419
MH-420
Treasure Well
NDWR-9211R (Risi Well)
MH-304
KV-064
MH-307
MH-308
KV-044
Bartine-3
Bartine-1
Bartine-2
MH-703 (Klobe Spring)
Kilometers
0 1 2 4 6 8 10
Miles
0 1 2 4 6 8 10
Explanation
Roberts Mountains Monitoring Sites
Stream
Gauging Station
Monitoring Well
Spring
Diamond Valley Monitoring Sites
Spring
Monitoring Well
Kobeh Valley Monitoring Sites
Stream
Monitoring Well
Spring
Wells to be Installed by EMLLC
DV Well
KV Well
PV Well
USGS Wells
Mine Supply Well
U.S. Highway
2-Track / Dirt Road
Primary Road
State Route
Nevada Counties
Mt. Hope Plan of Operations Boundary
Hydrographic Basin Boundaries
Limit of Projected 10' Drawdown Contour at Project Year 44 Proposed Action
Wet Meadow Complexes
Wellfield Corridor
Mainly Rabbitbrush and Greasewood
Mainly Saltgrass and other Wet Meadow Grasses
Patented Land
Private Land
Tailings
Streams
510000
520000
530000
540000
550000
560000
570000
580000
590000
4410000
4400000
4390000
4380000
4370000
4360000
EUREKA MOLY
Mt. Hope Project
Eureka County, Nevada
Water Resource Monitoring Plan
Figure 2
May 27, 2011

APPENDIX D

MOUNT HOPE PROJECT
MITIGATION SUMMARY PLAN

MOUNT HOPE PROJECT
MITIGATION SUMMARY PLAN

MOUNT HOPE PROJECT
MITIGATION PLAN

TABLE OF CONTENTS

1 INTRODUCTION 1
2 AUDITORY RESOURCES 1
3 CULTURAL RESOURCES 1
4 HAZARDOUS MATERIALS 2
5 HISTORIC TRAILS 2
6 LAND USE 2
7 LIVESTOCK GRAZING AND PRODUCTION 2
8 NATIVE AMERICAN TRADITIONAL VALUES 3
9 VEGETATION 3
10 VISUAL RESOURCES 3
11 WATER QUANTITY 4
11.1 Surface Water Resources 4
11.2 Ground Water Resources 6
12 WATER QUALITY 7
13 WETLAND AND RIPARIAN ZONES 7
14 WILD HORSES 8
15 WILDLIFE AND FISHERIES RESOURCES 9

ATTACHMENTS

ATTACHMENT 1: Pony Express Trail Access Mitigation Plan
ATTACHMENT 2: Wild Horse and Wildlife Water Source Mitigation Plan
ATTACHMENT 3: Greater Sage-Grouse Conservation Measures
ATTACHMENT 4: Mitigation Strategy for Protecting Important Roosting Colonies of Townsend's Big-eared Bats at the Mount Hope Mine

1 INTRODUCTION

This Mitigation Plan includes mitigation by resource from the Environmental Impact Statement (EIS) prepared for the Mount Hope Project (Project). The following four Bureau of Land Management (BLM) approved mitigation plans are included as attachments following this Mitigation Plan: Pony Express Trail Access Mitigation Plan (Attachment 1); Wild Horse and Wildlife Water Source Mitigation Plan (Attachment 2); Greater Sage-Grouse Conservation Measures (Attachment 3); and Mitigation Strategy for Protecting Important Roosting Colonies of Townsend's Big-eared Bats at the Mount Hope Mine (Attachment 4).

2 AUDITORY RESOURCES

Mitigation Measure 1: Construction in the vicinity of the Roberts Creek Ranch house and greater sage-grouse leks would be limited to daylight hours and would be limited during lekking periods (see Appendix D, Attachment 3). Construction equipment used in the vicinity of residences would be fitted with the best available technology manufacturers' noise control equipment, including engine exhaust silencers and acoustical enclosures. Noise control equipment would be maintained in good working order. Implementation of this mitigation measure would result in a less than significant impact.

3 CULTURAL RESOURCES

Mitigation Measure 1: EML would develop, and submit to the BLM for approval, a treatment plan to address the potential direct impacts to the 83 officially eligible sites within the Project APE. EML would implement the treatment plan prior to any surface disturbance of eligible sites within the area of direct impacts. All adverse effects under the NHPA and direct and indirect impacts under the NEPA to known-eligible properties indentified within the Project APE would be mitigated in accordance with the PA and the treatment plan prepared for the Project. Any previously unknown-eligible properties that may be discovered during construction activities would be mitigated in accordance with the PA. No residual adverse effects are anticipated, as all known-eligible sites would be mitigated in accordance with the PA and the treatment plan prepared for the Project. Any previously unknown-eligible properties that may be discovered during construction activities would be mitigated in accordance with the PA.

Mitigation Measure 2: In the case of inadvertent discovery of human remains, the BMDO Policy for the Discovery of Human Remains (IM NV-2010-001) – notification procedures would be followed. If the remains are determined to be native, NAGPRA inadvertent discovery procedures would be adhered to. Under the NAGPRA, section (3)(d)(1), it states that the discovering individual must notify the land manager in writing of such a discovery. If the discovery occurs in connection with an authorized use, the activity, which caused the discovery, is to cease and the materials are to be protected until the land manager can respond to the situation. Tribes, tribal organizations, possible lineal descendants, and individuals would then be contacted to determine cultural affiliation and subsequent transfer of custody procedures would begin.

4 HAZARDOUS MATERIALS

Mitigation Measure 1: EML would maintain their existing Emergency Response Plan located in the Plan of Operations (EML 2006; Appendix 11).

5 HISTORIC TRAILS

Mitigation Measure 1: As part of the Historic Treatment Plan, mitigation for the historic trail would include photo documentation to capture the setting and feel of the Pony Express Trail adjacent to the Project that would be visually impacted. The Treatment plan would also include off-site mitigation in the form of GPS mapping and surveying of off-site portions of the Pony Express Trail located on public land. Segments would be selected at a 1:1 ratio of linear mileage based on the length of segments of the trail that would be impacted by the Project and are considered eligible as discussed in Section 3.21.3 of the EIS. Additionally, Mitigation Measure 1, Visual Resources, would reduce visual impacts to users of the Pony Express Trail.

Mitigation Measure 2: EML would implement the mitigation plan included in Appendix D, Attachment 1 to provide access through the Project Area during the annual Pony Express re-ride, which generally occurs in June. This mitigation would allow for independent (non-NPEA) re-riders to follow the trail through the Project Area at other times of the year, subject to 30-day advance notice and certain safety restrictions, and subject to EML's approval, and to provide for an alternative route for trail riders during other times of the year, weather permitting.

6 LAND USE

Mitigation Measure 1: EML would, in consultation with the BLM and authorized holders of the affected ROWs, reestablish the structures that would be altered or removed, as appropriate.

7 LIVESTOCK GRAZING AND PRODUCTION

Mitigation Measure 1: The BLM would monitor for changes to forage productivity as a result of ground water drawdown associated with Project-related ground water pumping. If the BLM detects a loss of forage productivity attributed to the Project, the BLM would develop and provide EML with a list of appropriate seed mixes for those areas within and outside the Project Area impacted by water table drawdown that should be seeded. The nature of the seed mix may vary depending on the conditions encountered as a result of the drawdown. If the BLM determines reseeding to be necessary, the BLM would coordinate the conditions for reseeding (including a possible two-year grazing closure) with local permittees in order to reduce impacts to AUMs. Mitigation for the potential loss of water available for livestock from stock water rights and other surface waters are described in the Water Resources - Water Quantity impacts discussion (Mitigation Measures 1, 2, 3, 4, 5, 6, Water Quantity). Mitigation for loss of water available would also mitigate the loss of vegetation (livestock forage).

Mitigation Measure 2: Mitigation for the potential loss of water availability for livestock from stock water rights and other surface waters are described in the Water Resources - Water Quantity impacts discussion (Mitigation Measures 1, 2, 3, 4, 5, and 6, Water Resources).

Implementation of any of the specific mitigation outlined in these measures for springs located on private land would be subject to the authorization of the private land owner. Mitigation for loss of water available would also mitigate the loss of vegetation (livestock forage). Additionally, where livestock and wild horse use overlap those mitigation measures identified for wild horses (Mitigation Measure 1, Wild Horses) would also benefit livestock.

8 NATIVE AMERICAN TRADITIONAL VALUES

Mitigation Measure 1: In the case of inadvertent discovery of human remains, the BMDO Policy for the Discovery of Human Remains (IM NV-2010-001) – notification procedures - would be followed. If the remains are determined to be native, NAGPRA inadvertent discovery procedures would be adhered to. Under the NAGPRA, section (3)(d)(1), it states that the discovering individual must notify the land manager in writing of such a discovery. If the discovery occurs in connection with an authorized use, the activity, which caused the discovery, is to cease and the materials are to be protected until the land manager can respond to the situation. Tribes, tribal organizations, possible lineal descendants, and individuals would then be contacted to determine cultural affiliation and subsequent transfer of custody procedures would begin.

Mitigation Measure 2: In years of greater than average cone production, as determined by the BLM and requested by the tribes, EML would make areas within the Project Area fence available for Native American pine nut gathering, subject to all applicable MSHA requirements.

9 VEGETATION

Mitigation Measure 1: During periods of high fire danger, EML would utilize welding tents during welding activities along the pipeline or powerline routes in the Project Area.

10 VISUAL RESOURCES

Mitigation Measure 1: For reducing visual contrast, minimization of disturbance would be the most effective mitigation technique. Where disturbance is proposed, repetition of the basic landscape elements (form, line, color, and texture) would be implemented to minimize visual change. In order to lessen long-term visual impacts from the pit wall, treatment may be required to ensure that the final pit wall mimics the surrounding landscape colors as visible from KOP #2. Methods could include, but are not limited to, painting, staining, varnishing, or some other treatment that minimizes the contrast of the visibly exposed and unweathered rock of the pit wall. Any mitigation applications must be pH neutral and contain no caustic or alkaline chemicals to avoid potential adverse environmental impacts. Treatment may occur when the pit wall reaches its final slope configuration. The need for this treatment would be determined by the BLM at that time based on the color of the exposed pit wall surface and its contrast with the surrounding landscape. Specific dimensions and areas of mitigation would be determined by the BLM, based on the actual color of the final pit wall.

Clearing of land for WRDFs and facility construction would be done by creating curvilinear boundaries instead of straight lines to minimize disturbance of the landscape. Grading would

proceed in a manner that would minimize erosion and conform to the natural topography. Revegetation following recontouring would also reduce visual impacts. The specifics on the final reclamation design implementation would be completed in consultation with interested parties.

Mitigation Measure 2: Visual contrast, associated with the buildings, would be reduced by using construction materials or paints that are earth tones. This would minimize color contrasts with the surrounding landscape and help meet VRM objectives.

Mitigation Measure 3: To maintain dark sky conditions, and minimize visual disturbance, facility perimeter lighting, including lighting used to illuminate walkways, roadways, staging areas and parking areas, would be shielded so that the light would be cast in a downward direction. Low-pressure sodium lighting (or an improved technology, if readily available) would be used to reduce or eliminate detrimental lighting impacts and prevent unnecessary light pollution.

11 WATER QUANTITY

11.1 Surface Water Resources

Mitigation Measure 1: Specific mitigation for the two perennial stream segments and 22 perennial or potentially perennial spring sites are outlined in Table 3.2-9 of the EIS. Figure 3.2.21 of the EIS shows the anticipated location for the components of the facilities necessary to implement the mitigation measures outlined in Table 3.2-9 of the EIS. Implementation of any of the specific mitigation outlined in Table 3.2-9 of the EIS for springs located on private land would be subject to the authorization of the private land owner. The site-specific evaluation of the effectiveness of this specific mitigation for each identified surface water resource within the mine-related ground water drawdown area is presented in Table 3.2-9 of the EIS. The site-specific measures include one or more methods identified in Mitigation Measure 2 (Water Quantity). Similar methods (as identified in Table 3.2-9) would also be applied to streams and springs not identified in this analysis, if monitoring indicates that there are impacts that the BLM determines can be attributed to the mining operation. Implementation of the mitigation outlined in Table 3.2-9 of the EIS would result in up to approximately 37.2 acres of additional surface disturbance associated with road and pipeline construction and maintenance, as well as the need for approximately 302 acre-feet of water that would at least initially come from EML's existing water rights if additional water rights have not yet been secured. This specific mitigation would be implemented, as determined by the BLM, based on the results of the monitoring that is also outlined in this mitigation measure. EML would implement the water monitoring provisions outlined in Section 2.1.15 and Appendix C of the EIS to track the drawdown associated with the open pit dewatering and ground water production activities. In addition, EML would periodically update the ground water flow model as determined by the BLM. EML would be responsible for monitoring and annual reporting of changes in ground water levels and surface water flows prior to and during operation, and for a period of up to 30 years in the post mining and milling phase. The reports would be in a format and with a content that is acceptable to the BLM. The monitoring outlined in Appendix C of the EIS and required in this mitigation measure would be used to document the effectiveness of the implemented specific mitigation activities. In addition, the BLM has the ability to require the implementation of additional mitigation measures if the initial implementation is unsuccessful.

Mitigation Measure 2: If monitoring (Mitigation Measure 1, Water Quantity) indicates that flow reductions of perennial surface waters are occurring and that these reductions are likely the result of mine-induced drawdown, the following measures would be implemented:

1. The BLM would evaluate the available information and determine whether mitigation is required.

2. If mitigation would be required by the BLM, then EML would be responsible for preparing a detailed, site-specific plan to enhance or replace the impacted perennial water resource(s). Potential adverse effects to water rights from the Project would be mitigated under NDWR jurisdiction, as well as potential need for additional BLM permit acquisition activities and NEPA analysis. The mitigation plan would be submitted to the BLM identifying the excess amount of drawdown or drawdown impacts to surface water resources. Mitigation would depend on the actual impacts, site-specific conditions, and historical use and could include a variety of measures (e.g., flow augmentation, on-site or off-site improvements). Methods to enhance or replace the impacted perennial water resources include, but are not limited to, the following:

    - Modification, including cessation, of pumping distribution in the water supply well field;
    - Injection to confine the drawdown cone;
    - Installation of a water-supply pump in an existing well (e.g., monitoring well);
    - Installation of a new water production well;
    - Piping from a new or existing source;
    - Installation of a guzzler;
    - Enhanced development of an existing seep or spring to promote additional flow;
    - Water hauling;
    - Removal of piñon-juniper in impacted watersheds; or
    - Fencing or other protective measures for an existing seep to maintain flow.

3. An approved site-specific mitigation plan would be implemented followed by monitoring and reporting to measure the effectiveness of the implemented measures.

Mitigation Measure 3: The numerical ground water flow modeling indicates that some impacts to springs may occur after the end of mining and milling operations, when some of the operational measures described above may not be available. For the post-Project delayed impacts of drawdown, the ground water flow model would be updated during the closure process consistent with regulations and policies using the accumulated field data for pumping rates, consumptive use, and observed drawdown within the HSA to re-evaluate projected drawdown that would occur after the end of mining and milling operations. If the BLM determines that the Project impacts perennial stream segments or springs in this post-operational phase, mitigation consisting of one or both of the following measures would be required:

1. Installation of a well and pump at affected stream or spring locations to restore the historic yield of the affected surface water resource.

2. Posting of an additional financial guarantee to provide for potentially affected water supplies in the future.

11.2 Ground Water Resources

Mitigation Measure 4: For the seven wells with associated active ground water use with water rights EML would assess the distance of the screened interval and the pumping below the ground water table. If that difference is greater than maximum predicted drawdown, then EML would pay the water right holder for the increase in pumping costs based on historical usage. If the difference is greater than ten feet, then EML would pay for either the lowering of the pump to a depth greater than the maximum drawdown in the well, or the completion of a new well with the screened depth greater than the maximum predicted drawdown and pay the water right holder for the increase in pumping costs based on historic usage. In addition, EML would implement the water monitoring provisions outlined in Section 2.1.15 and in Appendix C of the EIS. If, through implementation of the water monitoring, it is determined that there are impacts to wells with associated active ground water use with water rights attributable to the Project, whether predicted or not, then the following mitigation measures would be implemented.

Mitigation Measure 5: If monitoring (Mitigation Measure 1, Water Quantity) indicates that mine-induced drawdown impacts a well with associated active water use with rights, the following measures would be implemented:

1. The BLM would evaluate the available information and determine whether mitigation is required.

2. If mitigation is required by the BLM, then EML would be responsible for preparing a detailed, site-specific plan to enhance or replace the impacted ground water. The mitigation plan would be submitted to the BLM identifying drawdown impacts to ground water resources. Mitigation would depend on the actual impacts and site-specific conditions and could include the following:

    - Lowering the pump in an existing well;
    - Deepening an existing well;
    - Drilling a new well for replacement of water supply;
    - Providing a replacement water supply of equivalent yield and general water quality;
    - Pay for any incremental increase in pumping costs;
    - Modifying the KVCWF pumping regime (well locations or rates) during operations to reduce drawdown in the area of the impacted ground water resources;
    - Infiltrating or injecting water during operations at strategic locations to limit drawdown propagation in certain areas.

3. An approved site-specific mitigation plan would be implemented followed by monitoring and reporting to measure the effectiveness of the implemented measures.

Mitigation Measure 6: For any significant impacts to wells with associated active ground water use with water rights that do not occur until after the end of mining and milling operations, the operational measures described above may not be available. For the post-Project delayed impacts of drawdown, the ground water flow model would be updated during the closure process consistent with regulations and policies using the accumulated field data for pumping rates, consumptive use, and observed drawdown within the HSA to re-evaluate projected drawdown that would occur after the end of mining and milling operations. Wells with associated active ground water use with water rights not owned or controlled by EML that are indicated to be significantly impacted would then be mitigated by EML using one or more of the following measures, as directed by the BLM:

1. Installation of a deeper well and pump at affected locations to restore the historical yield of the well (including incremental increase in pumping costs).

2. Posting of a funding mechanism to provide for potential future impacts to potentially affected water sources.

Mitigation Measure 7: EML would be responsible for specifically monitoring for fissure gully development. If fissure gullies form, they would be filled in with clean, coarse-grained alluvium, with the intent of providing a rapid means of dissipation for any surface water entering the fissure and thereby reducing the propagation of the fissure through continued erosion. The fill material then would be seeded with a BLM-approved seed mix.

12 WATER QUALITY

Mitigation Measure 1: EML would submit a North TSF upstream diversion structure design. This design would be of sufficient capacity to divert run-on from the North TSF so that the current evaporate pond design would be sufficient to contain the designed storm events. The design would be submitted to the BLM 24 months prior to the anticipated start of construction. The BLM would approve the design prior to the commencement of construction.

Mitigation Measure 2: The measures outlined under Mitigation Measures 1, 2, and 3 would address the potential reduced flows outlined in the impact.

13 WETLAND AND RIPARIAN ZONES

Mitigation 1: As stated in Mitigation Measure 1 for Water Quantity specific mitigation for the two perennial stream segments and 22 perennial or potentially perennial spring sites are outlined in Table 3.2-9 of the EIS. Implementation of the mitigation outlined in this table would result in up to 46.3 acres of additional surface disturbance associated with the pipeline construction and maintenance. This supplemental water should sustain riparian vegetation. EML, in coordination with the BLM, would identify sites for mitigation in the area affected and implement mitigation measures at a three to one ratio with local cuttings, plugs, or seeds within one year of direct disturbance. EML would monitor these sites on an annual basis for at least three years after treatment to ensure effectiveness.

14 WILD HORSES

Mitigation Measure 1: Specific mitigation for surface water resources identified as being impacted by the Project is listed in Table 3.2-9 of the EIS. In order to further mitigate the loss of habitat and water sources to wild horses through the Project Area, EML would provide alternative water sources for wild horses. Six locations within the Whistler Mountain and Roberts Mountain HMAs have been identified in coordination with the BLM and would be developed as water sources for horses and could also be used by wildlife and livestock in areas historically used by wild horses (Figure 3.13.1 of the EIS). These sites consist of existing stock wells that are not currently functioning or do not have pumps or troughs and two new sources tapped from Project production wells. These sources would provide water where it has not been available previously or where availability has been limited. These sources would replace water sources located within the Project boundary fence that would no longer be available to wild horses. Distribution of wild horse use would also be improved. The Project's Mitigation Plan is included in this EIS as Appendix D.

The development of these six sites is detailed in Appendix D, Attachment 2. Appendix D, Attachment 2 includes a description of how each site would be developed. The sites would be owned and operated by EML. Operations would include periodic inspections and maintenance, turning water on and off, and winterizing water sources as determined through coordination with the BLM. Upon Project completion, improvements associated with the stock watering wells and spring would remain in place for the continued support of wild horses, wildlife, and livestock within the HMAs and grazing allotments. EML would implement the mitigation plan in Appendix D, Attachment 2. Should EML decide not to retain ownership of the associated water rights, agreements would be reached at that time between EML, and those associated with the current grazing privileges on the specific allotment(s), NDOW, and BLM to transfer ownership of these improvements to the appropriate parties.

The selection of new or replacement troughs and tanks would be based on design to reduce evaporation in the summer and reduce freezing in the winter. All pipelines from wellheads to the Project fenceline under this mitigation would be buried below the ground to avoid limiting wild horse movement.

If Project activities caused a water source to become unavailable to wild horses, the Authorized Officer could require a new well to be drilled or another water development to be constructed in the general area to provide adequate water for the wild horses. Should monitoring indicate that wild horses were being negatively impacted by the mining activities, the Mount Lewis Field Manager could require additional measures for the protection of wild horses such as seasonal restrictions during the peak foaling period.

Mitigation could include annual, biennial, or quarterly helicopter population inventory flights of the area in addition to on the ground monitoring by BLM and Project personnel. However, the use of a helicopter below 500 feet would not occur between March 1 and June 30 in order to prevent disruption during foaling period, causing orphaned or abandoned foals.

Fences constructed around the Project Area would use white-topped steel posts. Additional reflectors may be necessary if problems with horses impacting fences occur. Fences should be

continuous with no breaks (no drift fences). Horses climb steep or rocky terrain and may go around the ends of fences.

Should horses be discovered within the fenced areas, Project personnel would contact the BLM immediately to assist with the removal of the horses. Wild horses could be fence-wise and difficult to push through gates or fence openings. This often results in horses attempting to jump fences and becoming cut by barbed wire. BLM staff have materials to assist in the removal of wild horses. Project personnel would not "haze" wild horses out of fenced areas.

EML would avoid the BLM's Key Management Areas for vegetation monitoring established near Mount Hope and in Kobeh Valley.

Additional mitigation for livestock grazing and production is summarized in Appendix D.

15 WILDLIFE AND FISHERIES RESOURCES

Mitigation Measure 1: Mitigation for noise impacts is included in Mitigation Measure 3 (as identified in the Sage Grouse Conservation Measures in Appendix D, Attachment 3) and includes noise reducing enclosures that would be installed on the Project's booster stations in Kobeh Valley as well as possible modification to the pumping regime during lekking season.

Mitigation Measure 2: Mitigation for the potential loss of water would include the development of six water sites (Figure 3.13.1 of the EIS) that were identified for wild horses and two additional sites that would be designed specifically for wildlife use. Although the sites shown on Figure 3.13.1 of the EIS were identified as part of mitigation for wild horses (Section 3.13 of the EIS), development of the sites could also result in indirect beneficial impacts to wildlife species throughout the Project Area. The locations and design of the wildlife-specific water developments would be determined by the Wildlife Working Group described in the Sage Grouse Conservation Measures in Appendix D, Attachment 3. Additional mitigation has been proposed for wetland vegetation in Section 3.11 of the EIS (Mitigation Measure 1, Wetland and Riparian Zones).

Mitigation Measure 3: Mitigation measures are identified in the Mount Hope Sage Grouse Conservation Measures (Appendix D, Attachment 3). The measures identified in this attachment include the following: conservation measures for low profile camouflaged equipment, water pipelines, transmission lines, nesting/perching maintenance, noise, perimeter fence collision prevention, seasonal restrictions, and minimization of additional disturbance; off-site mitigation; formation of a Wildlife Working Group; research; and treatment options for burial of the above-ground powerline and vegetation treatments. Additional mitigation developed for pygmy rabbits (Mitigation Measure 6, Wildlife and Fisheries Resources) would reduce the effect to sagebrush habitat utilized by greater sage-grouse. Mitigation Measure 1 (Wild Horses), also minimizes habitat fragmentation from the wellfield pipeline.

Mitigation Measure 4: Land clearing would be conducted outside the avian breeding season, which is March 1st through August 31st for raptors and April 1st through August 1st for other migratory birds. If this is not possible, then a qualified biologist would survey the area to be cleared prior to clearing, within 14 days of disturbance. If disturbance has not occurred within 14

days of the survey, another survey would be conducted. If active nests were identified, or if other evidence of nesting (mated pairs, territorial defense, carrying nesting material, transporting food) was observed as a result of this survey, then a protective buffer (the size of which would depend on the requirements of the species) would be delineated and the delineated protective buffer avoided to prevent destruction or disturbance to nests until the nests were no longer active or nesting activities were no longer observed.

Mitigation Measure 5: All suitable golden eagle nesting habitat located within a five-mile radius of the Project Area boundary would be surveyed twice a year by a qualified biologist for the life of the Project to check the use status of golden eagle nests and habitat. If a nest is determined to be active, the nests would be monitored by video (with still images recorded every five minutes) and the recording would be reviewed by a qualified biologist once a week until the young have fledged. During the 18- to 24-month construction phase, the timing of weekly monitoring of active nests would occur from sunrise to sunset by video (with still images recorded every five minutes). During the 44-year mine life, the weekly monitoring for active nests would coincide with blasting activities. The video camera would record the nest beginning two hours before the blast and end two hours after the blast (with continuous video images recording). Annual reports would be submitted to the BLM biologist summarizing the results of the surveys. Following one year of monitoring, the qualified biologist would develop interpretable metrics to evaluate whether disturbance affects golden eagles. If there are impacts to golden eagles identified, the qualified biologist would coordinate with the BLM and USFWS to develop an adaptive management strategy to mitigate impacts for subsequent years. If a negative impact to nesting golden eagles is detected during monitoring, the BLM biologist would be contacted by electronic mail or phone by the next business day.

Mitigation Measure 6: EML would fund future sagebrush habitat improvement projects in the area that would directly benefit pygmy rabbits. Based on a ratio of two acres per every acre disturbed, EML would provide 950 acres of habitat improvement projects. Projects would be selected by the Wildlife Working Group which would review greater sage-grouse habitat projects (described in Appendix D, Attachment 3). Projects that benefit both greater sage-grouse and pygmy rabbits could count toward both acreage requirements as approved by the Wildlife Working Group.

Mitigation Measure 7: The mitigation measures identified in Section 3.2.3 of the EIS would be sufficient to mitigate the impacts to LCT from the Proposed Action.

Mitigation Measure 8: In order to minimize impacts to bat habitat, prior to the initiation of Project activities, EML would close those mine workings that would be removed over the life of the Project (after bats have been evacuated) and install bat-friendly closures on openings that would not be directly impacted by the Project in order to preserve access to the remaining bat habitat (also see Appendix D, Attachment 4).

ATTACHMENT 1

PONY EXPRESS TRAIL
ACCESS MITIGATION PLAN

Pony Express Trail Access Mitigation Plan
Eureka Moly, LLC

Introduction

Eureka Moly, LLC (EMLLC) is currently developing a mine to extract molybdenum ore from the Mount Hope deposit located in Eureka County, Nevada. The project is located 22 miles north of the town of Eureka on State Highway 278. The approximately one-billion-ton molybdenite ore body will produce an estimated 1.3 billion pounds of recoverable molybdenum during its 44-year lifetime.

Site Description

The mine facility will include an open pit, waste rock facilities, ore stockpile, two tailings storage facilities (TSFs), and processing and maintenance facilities. The TSFs will be located south of the mine site. The Pony Express Trail (PET) is located south of the mine facilities and north of the TSFs, bisecting the area between the TSFs and main mining facilities. The entire mining project area will be fenced to restrict access to the active operations. The fenced area delineates the active mining areas and prohibits access to the operation for safety and security purposes. Figure 1 shows the location of the PET in relation to the mine facilities.

A primary concern for EMLLC is the safety of all workers and visitors while on the mine property. The United States Department of Labor, Mine Safety and Health Administration (MSHA) provides federal oversight for safe operations of the mining facilities. EMLLC will work directly with MSHA to implement and enforce MSHA safety regulations.

As part of the safety regulations, MSHA requires that site-specific hazard awareness training, as detailed in 30 CFR § 46.11(b), be provided to all individuals prior to exposure to hazards that are inherent to mining activities. This training requirement also applies to non-employees, such as agency personnel and other visitors. Safety training would identify specific safety issues present at the mine, and training criteria would include awareness of potential hazards throughout the entire project area.

PET Historical Significance

EMLLC recognizes the important historical heritage and recreational values of the PET. Usage of the PET through the Mt. Hope operations boundary is encourage, while maintaining safe travel conditions. EMLLC will maintain the historical quality of this trail/road feature by limiting mine traffic on the PET within the project boundary. Mine equipment will be prohibited from traveling on the PET. Mine vehicles (e.g., pick-up trucks) will travel on the PET only for specific and limited work related activities within the immediate area of the PET. Prior to maintenance travel on the PET, mine personnel must receive approval from the Mt. Hope Environmental Department at the Mt. Hope project site. Signage at PET access points will

indicate travel prohibited unless pre-approved by the Environmental Department. Primary travel for mine vehicles through operations area will be by designated routes.

Purpose and Scope

Approximately 4 miles of the PET will cross the active mining area. Restricted access on the east and west ends of the PET will be established for safety reasons. EMLLC recognizes the important historical heritage and recreational values of the PET and encourages the use and enjoyment of the PET. Therefore, the primary purpose of this plan is to identify safe travel/access alternatives for travel for PET travelers, while remaining in compliance with required federal and state regulations and policies.

For this Access Mitigation Plan, travelers along the PET are defined as equestrians, pedestrians, bicyclists, and operators of various types of motorized vehicles.

PET Travel Alternatives

Three alternative options have been developed for safe means of travel along the PET. Signage will be posted to identify requirements for access and provide contact information.

Alternative 1, Annual Re-ride: EMLLC understands that an organized group traditionally conducts an annual re-ride event along the PET. To support the historical and recreational qualities of this event, special accommodations to allow access for travel along the PET through the active mining area will be provided during this once a year, one day event. All participants and their support personnel will be allowed to travel along this portion of the route. A "safe zone" will be established along the Mt. Hope portion of the PET specifically for the annual re-ride. The safe zone temporarily suspends MSHA requirements within the specific designation area of the PET only for an identified event. The safe zone allows the travelers to proceed through the active mining area with minimum stipulations. No alcohol or firearms will be allowed on the property at any time. In addition, due to the inherent hazards associated with the site, mine personnel will be assigned as escorts and will travel with riders to ensure safe passage through the active mining area. A Hazard Training Checklist has been developed and provides guidelines designed to protect visitors while adhering to MSHA policies. Travelers will be required to review the checklist with MSHA-trained mine personnel prior to commencing travel on this portion of the PET. This review would likely take 20 minutes or less and would be conducted at the gate where the trail enters the project area. A copy of the checklist will be given to the travelers to have with them as they proceed through the project area. The Hazard Training Checklist is provided in Addendum A.

A minimum 30-day advance written notice is requested from the organizers of the annual re-ride. The advance notice information should include dates, approximate times of travel within the project area, number of participants and mode of travel (e.g., horseback, pedestrian, vehicle, etc.). This advance notice will help EMLLC provide appropriate resources and allow adequate

preparation time in order to safely expedite travel through the project area during the re-ride event.

Support vehicles pulling trailers can easily by-pass the mine project area via Highway 278 and the Henderson Creek road, if an alternative route is preferred for larger vehicles.

Waiver: PET travelers who travel within the operations boundary under the provisions of Alternative 1 will be required to sign a liability waiver in addition to the Hazard Training Checklist.

Alternative 2, Independent Travelers (non-association): For those travelers independent of the re-ride event and exploring the trail on their own at all other times, access through the Mt. Hope project on the PET may be obtained based on the following conditions.

The 30-day advance notice is required for independent travelers to allow mine personnel to prepare for traveler access to the PET. A specific date and time must be agreed upon to establish adequate coordination. Depending on the situation, a safe zone may be established along the PET as described in Alternative 1. However, it may not be feasible to provide a safe zone for all independent PET travelers. Therefore, specific guidelines would be implemented when a safe zone was not practicable.

Per MSHA requirements, in absence of an established safe zone, site-specific training shall be given to each individual accessing the PET. Training would likely take 20 minutes or less and would be conducted at the gate where the trail enters the project area. Upon completion of the site-specific training, each individual must sign the training document to acknowledge receipt of the training. Safety requirements include the use of personal protective equipment (PPE). PPE will need to be worn at all times while within the active mining area. At a minimum, PPE will include hard hats, steel toe boots, safety glasses, long pants and safety vests. Each traveler will supply their own PPE. Access will be denied if a traveler is not equipped with the proper PPE.

Alcohol or firearms will be prohibited on the property at all times. Due to the inherent hazards associated with the site mine personnel will escort all travelers and associated support vehicles to ensure safe passage through the active mining area.

Waiver: PET travelers who travel within the operations boundary under the provisions of Alternative 2 will be required to sign a liability waiver in addition to the Hazard Training Checklist.

Alternative 3, Route By-Pass: Figure 1 identifies an alternative PET route that would by-pass the active mine area to the north. This route is outside the active mine area and the requirements in Alternative 1 and 2 do not apply.

Due to the difficult terrain for motorized vehicles, two proposed routes have been identified. Motorized vehicles would use the Highway 278 to Henderson Creek road. This route is furthest to the north and is an improved road in active use. A shorter but more difficult route would be

available for travelers on horseback. This route is tentatively proposed and requires further field review by EMLLC. The route may be adjusted following the field review and Figure 1 would be revised and resubmitted. To aid in travel, the equestrian by-pass route will be posted with signs identifying the by-pass.

Waiver: PET travelers who bypass the Mt. Hope portion of the PET under the provisions of Alternative 3 will not be required to sign a liability waiver or participate in the Hazard Training.

Revisions to this document: This document may be revised and updated with the goal of streamlining and improving this plan to better expedite travel through the project area.

Any changes in this mitigation plan would be subject to BLM approval.

Addendum A

Pony Express Trail Travel Hazard Training Checklist

Pony Express Trail Travel
Hazard Training Checklist

The Mt. Hope Mine is owned and operated by Eureka Moly, LLC (EMLLC). The United States Department of Labor, Mine Safety and Health Administration (MSHA) provides federal oversight for safe operations of the mining facilities. The operation of the mine is subject to the Code of Federal Regulations Section 30, parts 1-199. Within these regulations, the operator is required to protect all persons who access the mine project area. A small portion of the Pony Express Trail (PET) crosses within the operational boundary of the Mt. Hope Project area and is therefore subject to regulatory requirements under MSHA.

For travel along the PET during mine operations, a Safe Zone will be established during this time. The Safe Zone is specific to the area of the Pony Express Trail and guidelines within this document are designed to protect visitors while adhering to the regulating policies set forth by MSHA. Therefore, all visitors will be required to follow certain safety procedures that will be directed by EMLLC to ensure their safety.

The entire mining area is fenced to restrict access to the active operations. An allowance of a gated entrance at either end of the trail allows entrance to visitors under specific guidelines while escorted by company appointed personnel. These gates remained locked and posted "No Entrance" during normal operations. The annual re-ride and pre-arranged independent travelers allow for company escorted travel on the PET. Each person accessing the property along PET shall receive Hazard Training complying with 30 CFR 48-31 as set forth in the accompanied *Hazard Training Checklist For Visitors to Mt. Hope Mine*. Please review the checklist with the EMLLC representative and initial each item following the review and return the signed portion to the EMLLC representative.

For your convenience the items on the checklist are listed below:

- Not under the influence of alcohol or any illegal drugs.
- Received instruction in site specific hazards /emergency evacuation procedure.
- Comply with all signs and posted regulations.
- No photographs allowed while on mine property unless approved by escort.
- Removal of EMLLC property from the mine site is prohibited except with specific authorization.
- No horseplay while on mine property.
- Remain on designated trail, except at authorized locations while on mine property.
- Remain in the vehicle except at authorized locations.
- While in a vehicle, seat belts will be worn while on the mine site.
- Please remain with the escort at all times (should you be separated, remain in that location until help arrives).
- No firearms or hazardous materials are allowed on mine property.

Hazard Training Checklist for Pony Express Trail Visitor:

Name: _____ **Date: _____**

Purpose of Visit: _____ **Time: _____**

Issued By: _____

Hazard Training

Complies with 30 CFR 48-31

Hazard training covered below permits a visitor to travel while escorted by a company appointed experienced miner, but does not permit the visitor to do work of any type during his/her visit.

I have been to the Mt. Hope Mine before. Yes____ No____

Initial

_____ I verify that I am not under the influence of alcohol or any illegal drugs.

_____ I have received instruction in site specific hazards /emergency evacuation procedure.

_____ I will comply with all signs and posted regulations.

_____ I will not take photographs while on mine property unless approved by escort.

_____ I will not remove EMLLC property from the mine site without required authorization.

_____ I will not engage in horseplay while on mine property.

_____ I will remain on designated trail, except at authorized locations while on mine property.

_____ I will remain in the vehicle except at authorized locations.

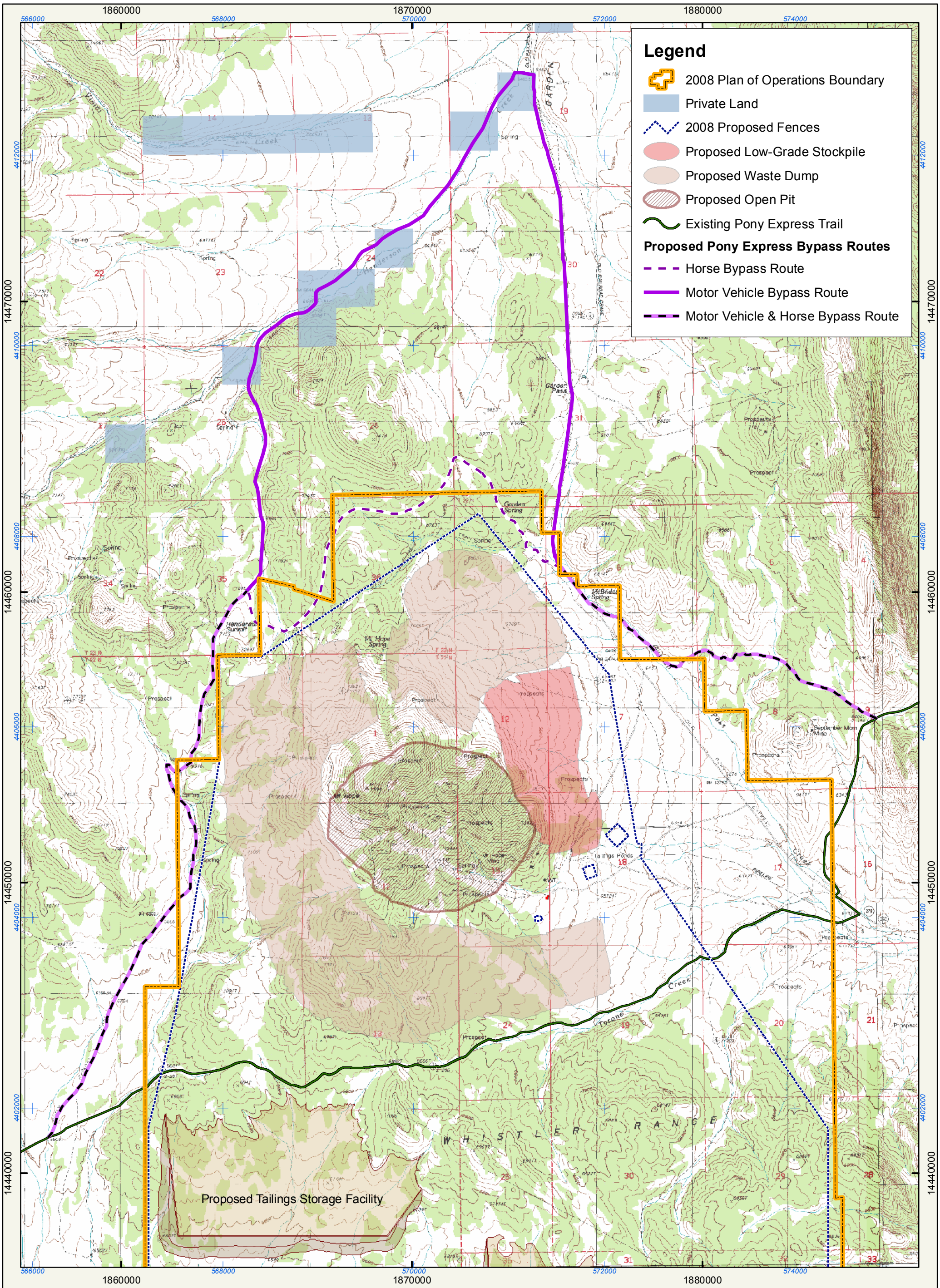
_____ I will use seat belts while in vehicles while on the mine site.

_____ I will remain with my escort at all times (should I be separated I will remain in that location until help arrives).

_____ I understand that no firearms or hazardous materials are allowed on mine property.

I have read and understand the above rule and agree to abide by them as a condition of entry to the mine. Any failure to comply may result in my removal from the property.

Signature_____



N

0 3,000 6,000 9,000 12,000 Feet

0 1,000 2,000 3,000 4,000 Meters

Datum: NAD83 UTM Zone 11N
Projection: Transverse_Mercator (US feet)

S:\GIS\Projects\Mt Hope\Permitting and Disturbance\MXD\PonyExpressAlternateRoutes.mxd

Eureka Moly, LLC

Mt. Hope Project

Eureka County, Nevada

Pony Express Trail Mitigation Plan, Proposed Alternate Route

November 20, 2008

ATTACHMENT 2

WILD HORSE AND WILDLIFE WATER SOURCE MITIGATION PLAN

Mount Hope Project
Wild Horse and Wildlife
Water Source Mitigation Plan

Purpose

Eureka Moly LLC plans to develop the Mount Hope Molybdenum Mine and Processing Project in central Nevada about 23 miles northwest of Eureka, Nevada. The proposed project would be located on public land administered by the U.S. Bureau of Land Management and on private land controlled by EMLLC. In order to safely operate the mining and processing operations, EMLLC will be required to install a perimeter fence that will exclude wild horses, some wildlife and livestock from the operating area. In addition several existing water sources within the footprint of the proposed operations will be lost as a result of mining and contruction activities. These mitigation measures are designed to reduce impacts to wild horses, other wildlife and livestock in the vicinity of the Mount Hope operations.

Goal

These mitigation measures are intended to minimize impacts to wild horses and wildlife. The wild horses in the Roberts Mountain and Whistler Mountain Herd Management Areas (HMAs) have been successful due to the presence of adequate food and water. The goal of the Wild Horse and Wildlife Water Source Mitigation Plan is to minimize impacts to wild horses and wildlife by restoring water sources, maintaining existing sources and creating new water sources to replace those that will no longer be available. This work will be done in concert with applicable state and federal agencies and other private stakeholders.

Mitigation Considerations

Mitigation measures proposed in this plan are designed to address several potential impacts that may threaten water sources in the project area. These potential impacts were identified through discussions between EMLLC and the Bureau of Land Management. EMLLC has evaluated these impacts and has designed engineered and administrative mitigation measures to address them. Specific impacts/threats that EMLLC is seeking to mitigate are as follows:

- Loss of water sources for animal watering
- Loss of habitat acreage created by the installation of project fencing
- Excess noise and disturbance created by pumps, vehicles and equipment

Mitigation Measures

The mitigation measures for surface water resources impacted by ground water drawdown (as described in Chapter 9 **of the Plan of Operations**) may also serve to mitigate the impacts on water availability for wild horses. In order to mitigate the loss of acreage and water sources throughout the Mount Hope Project, measures have been developed to provide alternative water sources. Six

alternative water source locations within the Whistler Mountain and Roberts Mountain HMAs have been identified that would be developed. These sites consist of three existing stock wells, one spring and two sources tapped from Mount Hope Project production wells. See Attachments A through F. These new locations will provide water where it has not been available previously or where availability has been limited. These sources will replace water sources that will no longer be available as they will be located within the Mount Hope Project operational fence. Distribution of wild horses, wildlife, and livestock use would also be improved, which will mitigate acreage losses by increasing usability of other areas within the HMAs.

Water sources will be owned and operated by **EML**. Operations will include periodic quarterly inspections and maintenance, turning water on and off, and winterizing water sources as needed. **EML** will ensure that adequate water rights will be designated for wild horses and wildlife at each of the locations.

Upon final completion of the Mount Hope Project, improvements associated with the stock watering wells and spring will remain in place for the continued support of wild horses, wildlife and livestock within the HMA's and grazing allotments. Should Eureka Moly decide not to retain ownership of the associated water rights, agreements will be reached at that time between Eureka Moly, allotment owners/leasees, the Nevada Department of Wildlife and the BLM to transfer ownership of these improvements to the appropriate parties.

Additional mitigation measures beyond the 6 water source improvements are as follows:

- Helicopter use below 500' AGL will not be allowed between March 1 and June 30 to prevent disruption during foaling period.
- Range fences constructed for the Mount Hope Project area will use white-topped steel posts.
- Fences will be continuous, with no breaks (no drift fences).
- The selection of troughs and tanks will be based on design to reduce evaporation in summer and reduce freezing in winter.
- Should horses be discovered within the fenced areas, mine personnel will contact the BLM to assist with the removal.
- Mine staff will not "**herd**" wild horses out of fenced areas without prior authorization from the BLM.
- Should monitoring indicate that wild horses are being negatively impacted by the mining activities, additional measures for the protection of wild horses and wildlife will be negotiated with the Mount Lewis Field Office.

Attachment A

Whistler Mountain (NV0608)

Romano Stock Well

- Historically used for livestock
- Re-install piping to trough
- Replace dismantled windmill with solar operated low-flow submersible pump

Attachment B

Whistler Mountain (NV0608)

Stinking Spring

- Historically used for livestock
- Evaluate springbox and valve construction –rehabilitate if needed
    - Completed - Springbox and valve in working order
- Re-install piping to trough
    - Completed – spring box has been re-connected to trough
- Currently operational and maintained by Permittee

Attachment C

Roberts Mountain (NV0607)

Big Windmill

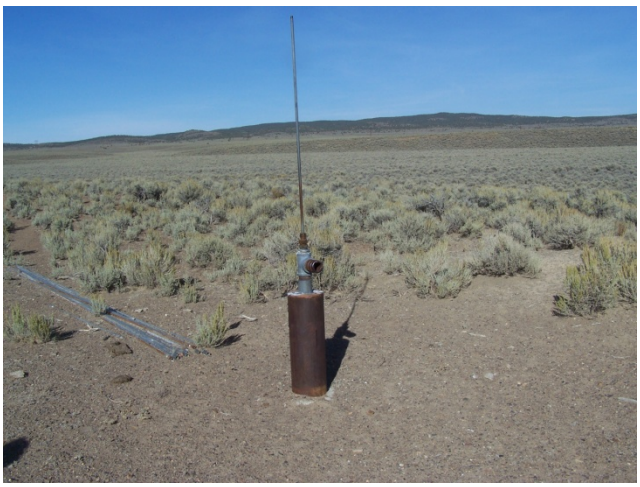
- Historically used for livestock
- The windmill would need to be turned on and the system assessed for any potential repairs
    - The windmill is in good condition, regular maintenance and winterization have been maintained by Permittee
- Piping and troughs are in good condition

Attachment D

Roberts Mountain (NV0607)

Old Stock Well (BLM map ID #12)

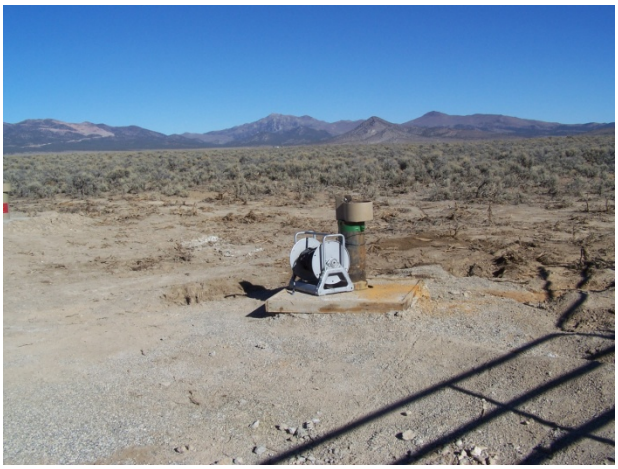
- Historically used for livestock
- Originally pumped with windmill, casing and rod still in place, no troughs or piping remaining
- Rod will be pulled and well assessed
  - Completed
- Install solar operated low-flow submersible pump
- Re-install piping and trough



Attachment E

GMI Production Well RWX-222

- Install a tap in the pipeline to feed a trough in the vicinity of the well



Please note that the Mount Hope production wells will likely be on a rotational operation and maintenance schedule. There may be times when wells will be shut off for maintenance or due to the need to allow the aquifer to rest. Eureka Moly will consider water availability for wild horses and wildlife in its rotation schedule.

Attachment F

Whistler Mountain (NV0608)

GMI Production Well RWX-220

- Install a tap in the pipeline to feed a trough in the vicinity of the well

Please note that the Mount Hope production wells will likely be on a rotational operation and maintenance schedule. There may be times when wells will be shut off for maintenance or due to the need to allow the aquifer to rest. Eureka Moly will consider water availability for wild horses and wildlife in its rotation schedule.

ATTACHMENT 3

MOUNT HOPE GREATER SAGE-GROUSE CONSERVATION MEASURES

Mount Hope Greater Sage-Grouse Conservation Measures

Purpose

Eureka Moly LLC (EML) plans to develop the Mount Hope Molybdenum Mine and Processing Project in central Nevada about 23 miles northwest of Eureka, Nevada. The proposed project would be located on public land administered by the U.S. Bureau of Land Management (BLM) and on private land controlled by EML. In order to provide water necessary for mining and processing operations, EML is developing a well field in Kobeh Valley directly west of the mine and processing operations. These conservation measures are designed to reduce impacts to greater sage-grouse from the mining and processing operations and within the production water well field within Kobeh Valley.

Goal

These conservation measures are intended to minimize impacts to greater sage-grouse resulting from the Mount Hope Project. Greater sage-grouse have recently been identified as a concern by numerous Federal and state agencies in the United States due to declining populations. Reasons for this decline were detailed by the U.S Fish and Wildlife Service in the following Federal Register publication: Endangered and Threatened Wildlife and Plants; 12-Month Findings for Petitions to List the greater sage-grouse (*Centrocercus urophasianus*) as Threatened or Endangered (Fed. Reg. 3/5/2010). Although greater sage-grouse have not been formally listed as Threatened and Endangered (the USFWS listing decision established the species as warranted but precluded, placing greater sage-grouse on the candidate species list); EML is committed to minimizing impacts. Greater sage-grouse use a variety of habitat in and around the project area. The goal of the measures is to avoid greater sage-grouse habitat where possible and, where avoidance is not possible, reduce impacts to an acceptable level or provide off-site mitigation where impacts are unavoidable or cannot be reduced through mitigation. This work will be done in concert with applicable state and Federal agencies and other private stakeholders.

Proposed Project Summary

The 80-year project would have an 18- to 24-month construction phase, 44 years of mining and ore processing, 30 years of reclamation, and five years of post-closure monitoring. Concurrent reclamation would not commence until after the first 15 years of the Project. Optimal development of the molybdenum deposit, to meet the market conditions and maximize molybdenum production, would utilize an open pit mining method and would process the mined ore using a flotation and roasting process. The permanent surface disturbance associated with the proposed activities totals 8,355 acres on both public and private lands.

The well field is planned to target both the carbonate and alluvial aquifers located in Kobeh Valley. The carbonate aquifers are generally located at the foot of the Roberts Mountains in the area of Roberts, Rutabaga, and Coils Creeks. The targeted alluvial aquifers are located primarily in the northeast quadrant of Kobeh Valley north of Lone Mountain to the base of the Roberts Mountains, West of Whistler Ridge and east of Coils Creek. The well field will consist of:

- production and monitoring wells
- vertical line shaft or submersible pumps and motors
- electrical controls and cabinetry
- water pipelines
- booster stations
- electric transmission lines, and
- access roads.

Conservation measures proposed in this plan are designed to address several potential impacts that may threaten greater sage-grouse success in Kobeh Valley. These potential impacts were identified through discussions between EML, the Nevada Department of Wildlife, and the Bureau of Land Management. EML has evaluated these impacts and has developed design features and mitigation measures to address them. Specific impacts/threats that EML is seeking to avoid are as follows:

- Raptor / scavenger predation from elevated equipment and power poles
- Visual encroachment/interruptions created by elevated equipment, power poles, vehicular travel and dust
- Interruption of "bird foot traffic" created by above ground pipes, extended elevated berms, or other linear features that may block passage
- Noise created by pumps, vehicles and equipment
- Unreclaimed surface disturbance resulting in habitat loss

Conservation Measures

Low profile camouflaged equipment

- Low profile pumps and cabinetry will be specified and installed. If feasible, equipment will be painted or covered to minimize contrast with the surrounding environment.
- Where possible, terrain/topography will be used to minimize the site distance for permanent equipment.

Water Pipelines

- Cross country water pipelines will be buried to minimize the impacts on wildlife travel and fragmentation of habitat. Disturbed surfaces will be graded and seeded immediately (first spring or fall) following construction. Where burial is not practical, as determined by EML and the BLM, earthen pipe crossings will be provided every 300 feet to allow bridging of the pipeline. They will be approximately 20 feet wide with an approximate

slope of 6:1 and seeded with an appropriate seed mix determined by the BLM to 1) preclude the establishment of noxious and invasive non-native weeds and 2) provide adequate cover for greater sage-grouse.

Transmission Lines

- The transmission line connecting the project to the Machacek Substation will parallel the existing Falcon-Gondor transmission line to minimize additional disturbance and eliminate an additional corridor that could result in perching structures or migration impediments.
- Well field electrical transmission lines will be buried within the two-mile buffer around active greater sage-grouse leks.
- Conductors will be spaced in accordance with recommended construction specifications to prevent electrocution of raptors or other birds that may attempt to land on transmission line poles or equipment.
- Above ground power lines would be constructed with vertical wire orientation and equipped with Zena Perch Preventers (or an alternative design approved by the BLM) and flight diverters to deter predatory perching and collisions.
- Zena Perch Preventers (or an alternative design approved by the BLM where modifications are necessary) will be installed on other fixed equipment, where determined by the BLM to be necessary, within .6 miles of an active greater sage-grouse lek to minimize perching opportunities for raptors and ravens.
- The existing Atlas transmission line will be upgraded in Kobeh Valley to include Zena Perch Preventers (or alternative design approved by the BLM) and flight diverters between the western boundary of the project area and the tree line on Whistler Mountain.

Nesting/Perching Maintenance Program

- In accordance with treaties, statutes and regulation, a program will be implemented to inspect and remove nesting or other materials from transmission lines and equipment that reduce the effectiveness of the anti-perching measures. Depredation permits would be obtained as needed. EML would comply with all USFWS standards regarding the removal of nesting materials.

Noise

- Noise reducing enclosures will be installed around booster stations within the two-mile buffer around recognized leks. Enclosures will be designed to achieve a noise level of 30 dB (10 dB above ambient) or less at greater sage-grouse leks.
- Between March 1st and May 31st, the pumping regime in the well field may be modified, where possible, to reduce noise disturbance at active greater sage-grouse leks.

Perimeter Fence Collision Prevention

- Perimeter fences in preliminary priority habitat and preliminary general habitat will be constructed with permanently affixed reflectors or other devices approved by the BLM to maximize their visibility for wildlife and minimize the potential for collisions.

Seasonal Restrictions (March 1st- May 31st)

- Construction would not take place within the two-mile buffer area of active leks unless a determination is made by the BLM and NDOW that no bird breeding or nesting is occurring in the area.
- No vehicle traffic within ¼ mile of active leks will be allowed between one hour before sunrise and 10am.
- Vehicle speeds within the two mile buffer area of active leks will be limited to 25 mph

Minimization of Additional Disturbance

- To the extent possible, existing transmission lines, roads and other surface disturbance will be used to minimize additional disturbance to preliminary priority and preliminary general habitat.

Off-Site Mitigation

In addition to the conservation measures listed above, EML will also complete off-site terrestrial habitat restoration/enhancement and other activities to compensate for the permanent disturbance of preliminary priority habitat (PPH) and preliminary general habitat (PGH) in accordance with Nevada IM 2008-204 *Off-site Mitigation*. Current calculations of these areas equate to 3,287 acres of PPH and 1,965 acres of PGH. If, through field verification by the BLM in consultation with NDOW, it is determined that some of the area included in the below calculations is not of sufficient quality to be characterized as PPH or PGH or areas that aren't currently designated on the map are of sufficient quality to be included as PPH or PGH, the required acreage of off-site mitigation may be adjusted accordingly. EML will fund all restoration and enhancement projects to BLM specifications and follow all BLM requirements.

Acreage Calculation

PPH will be replaced at a 3:1 ratio, which equates to a total of 9,861 acres (3 x 3,544 acres) of habitat restoration/enhancement. PGH will be replaced at a 2:1 ratio, which equates to a total of 3,930 acres (2 x 1,965 acres)[1]. The total obligation for off-site restoration/enhancement would be 13,791 acres. The potential or likely treatment areas to be restored/enhanced include public land within the Three Bar Population Management Unit (PMU). These potential treatment areas will

[1] These ratios are derived from the Governor's Sage-Grouse Conservation Team document (GSGCT, 2010) titled Nevada Energy and Infrastructure Development Standards to Conserve Greater Sage-Grouse Populations and Their Habitats. Although these standards have not been adopted by the BLM, they were used as a reference for determining appropriate acreage equivalents.

be identified on a case-by-case basis, based on field inventory of habitats, conditions, and potential value to greater sage-grouse as well as indications of effects to greater sage-grouse based on monitoring results. While the project will directly and indirectly impact priority habitat in the Roberts Mountain/Kobeh Valley areas, the goal of the restoration/enhancement efforts will focus on entire habitat throughout the life cycle of greater sage-grouse within the Three Bar PMU. Habitat treatments will be prescribed for specific sites based on the probability of successful restoration/enhancement and the greatest benefit to local greater sage-grouse metapopulations (i.e., a group of spatially separated populations of the same species, which interact at some level). The determination of where a specific project is located and when work would be conducted would rest with the Wildlife Working Group to allow for incorporation of applicable study or monitoring data and identification of areas with the best habitat potential. Prior to implementation of these various or potential treatment options (and after an area is designated for treatment) cultural surveys and Native American Consultation/Coordination will be completed per BLM protocols.

Wildlife Working Group

A Wildlife Working Group (WWG) will be established and will meet annually, at a minimum, to identify, discuss, and select habitat enhancement treatments, ensure appropriate implementation has taken place for previous treatments, and track the corresponding acreage to confirm compliance with the off-site mitigation requirement. Project suggestions will be accepted from the member agencies or the public and the WWG would serve as the deciding body for final project selection. The WWG will also provide direction on possible research that could fulfill a portion of the acreage requirement, as specified below. The WWG will consist of members from the BLM, NDOW, and EML.

Treatment Options

- Burial of Above-Ground Power Line:

  The Plan of Operations for the Mount Hope Project proposes to bury the well field power line only within two miles of greater sage-grouse leks. The well field power line is ancillary to the overall mining operations and, subsequently, the standards for burial of power lines permitted under the right-of-way regulations do not apply. However, as an incentive to prevent further habitat degradation resulting from a new above-ground power line in intact PPH, an acreage credit would be granted toward the overall off-site mitigation requirement if the power line is buried. There are two separate portions of power line that may be above-ground. The first is located around the northernmost booster station shown on Figure ES.3 in the EIS. At this location, there are 1.7 miles of proposed power line located outside of the 2-mile buffers from active greater sage-grouse

leks, which would equate to an acreage credit of 402 acres[2]. The second area is the southernmost 8.4 miles of proposed power line within the wellfield, which equates to an acreage credit of 1,985 acres.

- Research

  Up to ten percent of the acreage obligation, a total of 1,379 acres could be met by funding research studies as determined by the Wildlife Working Group. Acreage credit would be granted at a rate of one acre per $600 of research funding.[3]

- Vegetation Treatments:

  Treatments may include, but are not limited to, the following:

  - Burn restoration (historic burns) including: seedings (sagebrush and understory vegetation via broadcast, broadcast and harrow, drill or hand planting of seedlings), noxious and non-native invasive plant treatment (Plateau® for cheatgrass and other herbicides as needed for other invasive and/or noxious weed species), and possible temporary fencing to protect areas of restoration.
  - Brush thinning via mechanical methods, herbicide or hand thinning followed by seeding (seeding to be done via broadcast or drill methods) to increase the diversity in monotypic sagebrush habitats;
  - Mechanical or hand shrub thinning or green stripping to reduce fuels and fire risk to greater sage-grouse habitats followed with successful seeding (seeding to be done via broadcast or drill methods);
  - Weed treatment followed with successful seeding (seeding to be done via broadcast or drill methods);
  - Mechanical or hand thinning of pinõn-juniper areas in which shrubs are still the dominant form (phase I pinõn-juniper woodland) or are co-dominant (early phase II pinõn-juniper woodland).
  - Diversification of seedings: seeding of shrubs and forbs into historical crested wheatgrass seedings.
  - Restoration and fencing of springs and wet meadows.
  - Application of prescribed fire or wildland fire for resource benefit.

- Additional activities deemed appropriate by the WWG. Equivalent acreage credits would be assigned by the WWG as appropriate.

---

[2] This calculation is based on the GSGCT, 2010 document that recognizes a 600-meter "zone of influence" on both sides of above-ground power lines. The calculation discounts the acreage by 50 percent since the burial of the power line would simply prevent further degradation rather than providing any enhancement to existing habitat and the area would likely require additional temporary disturbance in the future for maintenance purposes. The 50 percent discount rate was developed in consultation with NDOW.

[3] This rate is based on the GSGCT, 2010 document that recognizes $600 as the approximate cost to restore a degraded acre of habitat.

Completion Schedule

Within the first five years from the date of the Record of Decision, EML will be responsible for completing 3,300 acres of vegetation treatments. Within the first 15 years from the date of the Record of Decision, the equivalent of 10,100 acres must be restored. The equivalent of the total amount of 13,791 acres must be restored within 25 years from the date of the Record of Decision. During the first five years, the acreage requirement must be met through vegetation treatments only. During the remaining years the acreage requirements can be achieved using any of the Treatment Options listed above. If there are remaining acres that have not been completed by the 25-year point, EML will provide $600 per acre to the BLM to be placed in an interest bearing account for use on projects selected by the WWG that would comply with the Treatment Options listed above.

Effectiveness of Proposed Mitigation

Vegetation treatments have been successfully completed elsewhere on the Battle Mountain District and on land administered by the BLM throughout the western United States. Research and vegetation treatments, as proposed, would be selected by the WWG to address the highest priority areas that would benefit the local population of greater sage-grouse, which would enhance the effectiveness of the mitigation. These combined measures will minimize the development impacts and maintain or improve greater sage-grouse habitat throughout the Three Bar PMU. Increasing the quality and the quantity of currently degraded greater sage-grouse habitat will benefit not only individuals but also the local population.

Mitigation Impacts

Site-specific impacts resulting from vegetation treatments will be analyzed through separate NEPA processes such as the 3 Bars Ecosystem and Landscape Restoration Project, which is already underway, and other future documents.

ATTACHMENT 4

MITIGATION STRATEGY FOR PROTECTING IMPORTANT ROOSTING COLONIES OF TOWNSEND'S BIG-EARED BATS AT THE MOUNT HOPE MINE

Mitigation strategy for protecting important roosting colonies of Townsend's big-eared bats at the Mount Hope Mine by Eureka-Moly, LLC

Submitted to:

Steve Boyce, P.E., MBA
General Moly Inc.
Mt Hope Project
2215 North 5th St
Elko, NV 89801

By:

Richard E. Sherwin, PhD
Department of Biology, Chemistry, and Environmental Science
Christopher Newport University
1 University Place
Newport News, VA 23606
for

Holistic Wildlife Services, LLC
112 Hampton Roads Avenue
Hampton, VA 23661

BACKGROUND

Surveys investigating the use of abandoned mines by bats were conducted at the Mount Hope Mine project area (MHP) between March 6-11, 2007 and June 22-27, 2007. During these surveys we identified 12 discrete mines accessed through 21 openings. These mines included simple prospects, small production mines and one large complex mine. The Mount Hope Project Area includes mine workings which represent hibernation habitat for small-footed myotis and Townsend's big-eared bat. Most notable use was documented in the largest and most complex of the mines within the project area, the Mount Hope Mine (accessed through MHP Adit 01, MHP Shaft 06, MHP Stope, and MHP Adit 09). Cold season use by bats of other workings in the project area was relatively light and not exceptional.

Evidence of warm season use was documented throughout the project area with virtually all mines realizing some level of warm season use by bats. The most important mine for summer use is the Mount Hope Mine in which evidence was found of significant summer habitat for Townsend's big-eared bat. Biological residues associated with maternity use (guano, a single dead bat, and egg casings associated with parasites of ectoparasites) were documented in portions of this mine most closely associated with MHP Adit 9. Additionally the distribution of Townsend's big-eared bat guano in the Lorraine Mine suggests that this or another maternity colony occasionally uses these workings. Full descriptions of sites and details of biological findings are included in a final report submitted to the client in 2007. For sake of clarity however, a brief description of each site is included in Appendix I for reference.

Eureka Moly, LLC (EMLLC) proposed to mitigate for bats through a two phase strategy in which the least biologically important bat roosts were closed during Phase I in the fall of 2008 (report submitted). Other sites with moderately important bat habitat found within the footprint of the future operating areas (MHP Adit 6, Shaft 02, Shaft 03 complex; Lorraine Mine Portal 1 and 2; Vinnie Mine) are proposed for exclusion and backfill during Phase II. While exclusion of these sites prior to backfill attenuates the risk of any direct mortality resultant from the securing of these mines, it does not provide mitigation for the associated loss of habitat, particularly for subterranean habitat that would be lost through the closure of the Mount Hope Mine proper (MHP Adit 01, MHP Shaft 06, MHP Stope, and MHP Adit 09). All exclusions will follow protocols established in "Managing Abandoned Mines for Bats" (Sherwin et al. 2009) and all mines realizing hard (destructive) closures will be confirmed vacant prior to final closure. Details of past treatments and locations of openings are included in Figures 1 and 2.

PROPOSED MITIGATION STRATEGY

The greatest biological concern (for bats) has been the intense use of subterranean environments associated with the Mount Hope Mine complex (accessed through MHP Adit 01, MHP Shaft 06, MHP Stope, MHP Adit 09). This large mine (described in Appendix 1) is used by a maternity colony of Townsend's big-eared bats. Additionally, lower levels are used by bachelor Townsend's big-eared bats and small-footed myotis and for winter hibernation by a variety of species. The intensity and variety of use makes mitigating for the potential loss of this mine a challenge for a several reasons. First, it would be difficult to locate nearby mitigation habitat to replace this site as there are few abandoned mines of any size immediately adjacent to the MHP area, and secondly this site is used in such a

significant way that true replacement habitat is unlikely to be found locally. With this in mind EMLLC proposes that the Mount Hope Mine and all associated openings be preserved *in situ,* with all openings protected with bat compatible closures. This strategy is strongly supported by Dr. Rick Sherwin. The protection and maintenance of the Mount Hope Mine underground workings will offset the losses of habitat included in all other mines (closed in Phase I and proposed for exclusion and closure in Phase II) of this project. Additionally, bats excluded from other mines in the project area are familiar with this mine and will take advantage of its preservation. Finally, preservation of this site ensures that EMLLC is mitigating for colonies of bats directly impacted by this project, instead of simply trading these colonies for some located elsewhere, in a more convenient to manage location.

In preparation for this mitigation strategy each opening of the Mount Hope Mine has been revisited by Dr. Sherwin and designs of bat compatible closures for these openings have been prepared. Proposed closure designs are described below with specifications for gates included in Appendix 2.

MHP Adit 01

This opening accesses the primary haulage level of the Mount Hope Mine. The portal measures roughly 5 feet high and 4 feet wide. The initial 40 feet of the mine is driven through unconsolidated material and is supported by timberwork. This portal will be secured with a bat compatible closure, placed into a 3 foot diameter, 15 foot long culvert. Spacing on the horizontal bars will be no less than 5 inches. Removable bars will be used to allow future access.

MHP Shaft 06

This opening measures roughly 4 feet by 4 feet and accesses the emergency manway exit of the mine. This portal will be secured with a steel grate constructed of 2 inch square stock or similar material, with 4 inch spacing maintained between the bars. In order to maintain life of the grate and minimize vandalism this gate will be anchored into a cement collar, constructed around the shaft.

MHP Stope

This large glory hole measures roughly 30 feet by 40 feet and drops vertically into a large stope system. The edges of the stope are undercut, producing a very dangerous working. This opening will be secured with a chain link fence (or similar) constructed around the open stope at a sufficient distance to ensure human safety.

MHP Adit 09

This opening provides access to the upper stopes of the Mount Hope Mine though a 200' long decline. The opening measures 4 feet by 3 feet and is driven through unconsolidated material for the initial 10 feet. This portal will be secured with a bat compatible closure, placed into a 3 foot diameter, 15 foot long culvert. Spacing on the horizontal bars will be no less than 5 inches. Removable bars will be used to allow future access.

Figure 1. Map of mine openings in the Mount Hope Mine Project Area.

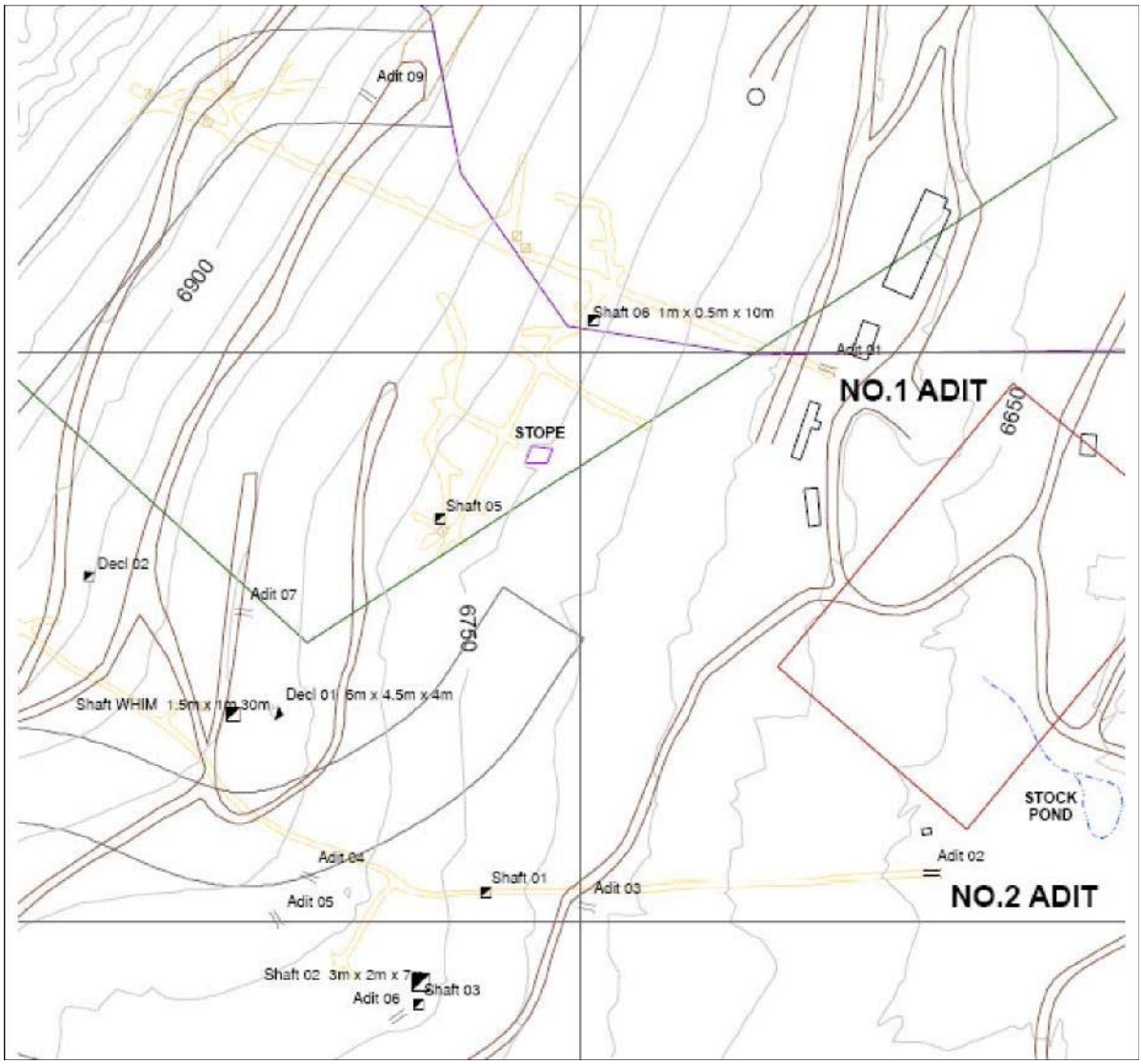
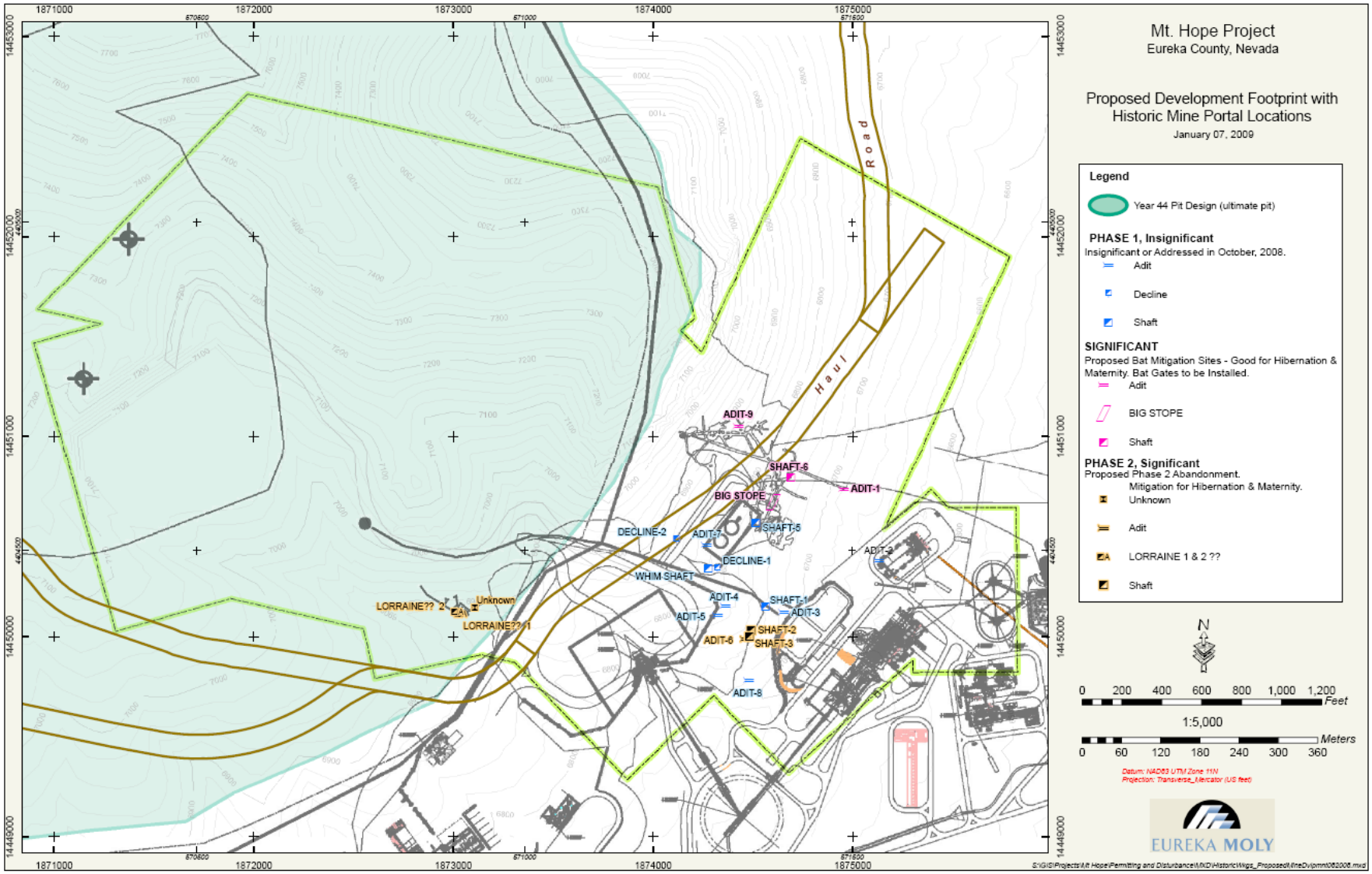


Figure 2. Map of mine openings in the Mount Hope Mine Project Area along with overview of footprint of mining operations and portal treatments completed to date (if any).



APPENDIX 1

Site Descriptions, Biological Evaluations, and Recommendations

(Excerpted from "Results of Cold and Warm Season Bat Surveys of Abandoned Mines at Mount Hope, Nevada"

We surveyed a total of 12 discrete mines accessed through 21 openings (Figure 1). Surveyed mines included simple prospects, small production mines and one large complex mine. Internal climatic conditions varied dramatically throughout the MHP area, with internal condition largely reflecting the number and placement of openings. Descriptions of mine interiors, biological findings, and specific recommendations are given below and in Table 1. Cold season surveys were conducted March 6-11, 2007 and warm season surveys were conducted June 22-27, 2007.

Mount Hope Mine (MHP Adit 01, MHP Shaft 06, MHP Stope, MHP Adit 09)

The Mount Hope Mine is a relatively large, complex mine that includes several thousand feet of horizontal workings broadcast across at least 6 discrete levels. The primary haulageway (accessed through MHP Adit 01) trends west into the hillside for approximately 1,000 feet. Drifts and crosscuts driven from the haulageway add an additional 1,800 feet of workings on this level. A series of raises, and inclines were driven from the main haulage level to access upper ore bodies. Removal of ore bearing materials from these areas has produced a series of large "ballrooms" that are ultimately accessible through an upper level decline (accessed through MHP Adit 09), an emergency manway exit (MHP Shaft 06) and a glory hole (MHP Stope). Lower levels (defined as those below the level of MHP Adit 01) are accessible through underhand stopes, winzes, and declines. These lower levels provide access to a series of large stopes that appear to be the most recently worked areas of the mine.

During cold season surveys we found hibernating Townsend's big-eared bats and small-footed myotis within the mine along with evidence of Townsend's big-eared bat maternity activity in the upper decline. At that time we documented 13 individual smallfooted Myotis scattered throughout this mine and a single Townsend's big-eared bat roosting in the primary haulage level. The propensity of myotids to roost in cracks and crevices and the complexity of the mine make it possible that other individuals were in the mine at time of survey but were unobservable.

During our warm season surveys we observed pregnant Townsend's big-eared bats in the upper level decline, but the bats had not yet formed a maternity cluster or given birth. Individuals were active at time of survey making it difficult to assess colony size, but at least 30 individuals were present at that time. We also located guano accumulations in workings surrounding the base of the MHP Stope that indicate that the maternity colony also uses this portion of the mine during the maternity period. Based on the sizes of located guano piles and staining (produced by pararhinal glandular secretions) on the back, it is likely that the number of mature females in this colony does not exceed 75 individuals. We found scattered guano and insect parts throughout the mine suggesting moderate levels of warm season use of all levels of the mine.

Recommendation

In the case that mining operations result in the destruction of, or otherwise negatively impact these workings, it is critical that adequate mitigatory actions precede and accompany their destruction. I recommend that the openings to this mine be left open

and accessible to bats until maternity use has ended, at which point intensive exclusion activities should be conducted (see Guidelines for Exclusions). Immediately following verification of site vacancy all openings to the mine should be permanently sealed with backfill or similar materials.

MHP Adit 02

The original adit opening is largely plugged with debris yet remains open to bats, where human access is provided through a vertical excavation that penetrates the workings at a depth of approximately 75 feet into the hillside. The mine openings were only recently excavated and stabilized by personnel from Idaho General Mines. The openings provide access to a crosscut that has been driven 1,200 feet into the hillside. Short drifts at 600, 900, and 1,150 feet represent the only lateral workings. A raise accesses the base of the decline in the MHP Adit 03/MHP Shaft 01 complex; however this connection is completely plugged with muck making it impossible to move between workings. The plug is sufficiently porous however that measurable airflow is moving between workings. A 20 foot deep winze 50 feet from the face of the primary crosscut represents the only lower workings in this mine. A small dam has been constructed near the portal to capture water draining through the mine. This water retention has resulted in the accumulation of silt behind the dam such that the distance between the sill and back slowly lessens until reaching a large series of fractures (620 feet -presumably where the water flows into the mine) at which point the dimensions return to historical size. The initial 300 feet beyond the dam was flooded to a depth of 8 inches and stains on the ribs indicate that water levels have historically reached as high as 2-3 feet. The interior of this mine was uniformly humid and wet.

We found no evidence that bats have recently used this mine in either the warm or cold seasons, which is not surprising based on the fact that the site was completely sealed until very recently. The internal conditions appear conducive to hibernation use by bats and it is likely that winter use will be realized if the site were to remain open and accessible.

Recommendation for Closure

This mine was only recently reopened and there is no evidence that bats have used this site in the recent past. In the case that mining operations result in the destruction of, or otherwise negatively impact these workings I recommend that the site be backfilled following their exclusion. Immediately following verification of site vacancy both openings to the mine should be permanently sealed with backfill or similar materials.

MHP Adit 03/MHP Shaft 01 Complex

These openings access the uppermost level of workings associated with MHP Adit 02, and include roughly 340 feet of workings on 2 discrete levels. The adit opening (recently opened by personnel from Idaho General Mines) accesses a crosscut that has been driven west for a distance of approximately 100 feet at which point it intersects the base of MHP Shaft 01. Drifts have been driven south and northwest from the base of the shaft for distances of 15 and 45 feet respectively. A 50 foot deep decline continues west from the base of the shaft and provides access to a 20 foot long crosscut, and once connected with

the MHP Adit 02 level. This historical connection is now plugged with muck essentially dividing the mine into two discrete sections.

We found no evidence of cold season use of this mine by any species of bats, nor were any bats present during warm season surveys. We did observe scattered guano throughout the mine suggesting occasional warm season use by Townsend's big-eared bat and a small species of myotis (likely from small-footed myotis).

Recommendations for Closure
The adit opening was only recently opened and has likely greatly enhanced the quality of the underground environment by increasing internal airflow and associated thermal complexity. In the case that mining operations result in the destruction of, or otherwise negatively impact these workings I recommend that measures be taken to minimize the likelihood of direct mortality associated with portal closure. Therefore I recommend that both openings be closed following adequate exclusion efforts.

MHP Adit 04
This large opening accesses a declined trench that terminates in a 20 foot deep prospect. We found scattered moth wings in this mine suggesting occasional use of this site by night roosting bats. This mine offers very little protection from ambient conditions and it is unlikely that it realizes anything but the most occasional use by any local species of bat.

Recommendation for Closure
Based on the limited internal dimensions of this mine it is unlikely that bat use will be overlooked by visual inspection. I recommend that the site be inspected for occupancy by bats, followed immediately by permanent closure with backfill materials.

MHP Adit 05
This site has been completely reclaimed and does not represent potential bat habitat.

Recommendation for Closure
No further closure action is necessary at this site.

MHP Adit 06/MHP Shaft 02/MHP Shaft 03 Complex
This small mine includes an open trench that leads to an adit opening which accesses approximately 250 feet of workings on two levels. The adit travels due north from the adit portal for approximately 40 feet where it intersects MHP Shaft 3 (at the 30' level). This shaft continues 60 feet below the adit level and terminates at a small pocket stope driven 15 feet into the west rib from the sump. The drift continues north beyond the windlass station for another 30 feet where it opens into the base of MHP Shaft 2. The adit turns west and continues for an additional 10 feet beyond this point.

We observed 2 small-footed myotis hibernating in the pocket stope at the base of MHP Shaft 3. There were no bats roosting in the mine during our warm season surveys, however we did observe scattered guano throughout this mine suggesting light levels of warm season use by Townsend's big-eared bat and a smaller species of myotis (most

likely from small-footed myotis).

Recommendation for Closure
In the case that mining operations result in the destruction of, or otherwise negatively impact these workings, measures should be taken to minimize the likelihood of direct mortality associated with portal closure. I recommend that exclusion materials be placed over all three mine openings and that the site be backfilled immediately following confirmation of site vacancy.

MHP Adit 07
This opening accesses a small prospect that has been driven roughly 30 feet west into the hillside. We found no evidence that bats have used this mine in any significant way in the recent past. Additionally, the small internal dimensions and lack of variability of internal surfaces suggest that this mine is of little consequence to local species of bats.

Recommendation for Closure
I recommend that exclusion materials be placed over this mine opening and that the site be backfilled immediately following confirmation of site vacancy.

MHP Adit 08
This site has been completely reclaimed and does not represent potential bat habitat.

Recommendation for Closure
No further closure action is necessary at this site.

MHP WHIM Mine (Whim Shaft and MHP Decline 01)
The Whim Mine is one of the oldest mines in the Mount Hope Project Area. Historical maps suggest that the primary shaft once reached a depth of 175 feet at which point it connected with some relatively large stopes. Internal surveys revealed that debris from the mill site has been dumped into the shaft and it is now completely plugged with these materials at a depth of 130 feet. Workings above this plug include stub drifts driven 30 foot into the north rib at depths of 30, and 125 feet. The 30 foot level drift undercuts an inclined stope driven from the north east rib of the shaft. This stope connects to the surface through MHP Decline 01.

We found no evidence that bats have recently used this mine in any significant way during either the cold or warm seasons; however the mine includes sufficient internal dimensions and climatic variability that bats likely make occasional use of this site.

Recommendation for Closure
If mining operations will result in the closure of this mine, I recommend that the decline be closed immediately with backfill material. Exclusion materials should be placed over the shaft opening and the site should be sealed immediately following confirmation of site vacancy. This shaft could be effectively sealed with backfill to depth or foam (PUF plug) with backfill cover.

MHP Decline 02

This opening accesses a 40 foot long pit that declines south to a depth of 25 feet where only the last 10 feet are underground. We found no evidence that bats have used this mine in any significant way in the recent past. Additionally, the small internal dimensions of this mine suggest that it is of little consequence to local species of bats.

Recommendation for Closure

Based on the limited internal dimensions of this mine it is unlikely that bat use will be overlooked by visual inspection. I recommend that the site be visually inspected for occupancy by bats, followed immediately by permanent closure with backfill materials.

MHP Shaft 05

This feature appears to be the remains of a structure rather than a mine opening. However, it is possible that the timbers represent the remains of a manway that may have accessed the Mount Hope Mine complex. If this site is indeed the remains of a mine it is now neither open nor accessible to bats.

Recommendation for Closure

If this feature was once a mine opening it is now completely plugged. No further action is necessary at this site.

The Lorraine Mine (Portal 1 and Portal 2)

The Lorraine Mine is accessed through two cable netted adit openings. These openings provide access to a relatively large mine that includes over 600' of drifts, crosscuts and stopes on at least 3 discrete levels. Additional lower levels appear to have been silted in through natural erosion processes associated with valley drainage. One of the uppermost stopes of the mine appears to open to the surface through a timber covered shaft (we were able to detect light coming through a plug in the back). However we were unable to locate this portal during surface searches.

We observed several small-footed myotis hibernating in this mine during cold season surveys. No bats were present during warm season survey, however we found abundant Townsend's big-eared bat guano scattered throughout this mine suggesting moderate levels of warm season use, and occasional use of the workings by the Townsend's big-eared bat maternity colony.

Recommendation for Closure

In the case that mining operations result in the destruction of, or otherwise negatively impact these workings, it is critical that adequate mitigatory actions precede and accompany their destruction. I recommend that the openings to this mine be left open and accessible to bats until maternity use has ended, at which point intensive exclusion activities should be conducted. Immediately following verification of site vacancy all openings to the mine should be permanently sealed with backfill or similar materials.

Vinnie Mine

This opening accesses a 100 foot long crosscut from which a 75 foot long drift has been driven. The mine is of relatively consistent height of six feet and width of 4 feet. We observed hibernating Townsend's big-eared bats and small-footed myotis in the mine during cold season surveys. This mine is used as a hibernation roost by Townsend's bigeared bats and small-footed myotis. Additionally we observed a single Townsend's bigeared bat roosting in the mine during warm season surveys. Scattered guano indicates that warm season use of this mine is relatively common.

Recommendation for Closure

In the case that mining operations result in the destruction of, or otherwise negatively impact this mine, measures should be taken to minimize the likelihood of direct mortality associated with portal closure. I recommend that exclusion materials be placed over the mine opening and that the site be backfilled immediately following confirmation of site vacancy.

APPENDIX 2

Recommended Gate Designs

(Designs from the Utah Division of Oil, Gas and Mining
that have proven effective throughout Utah)

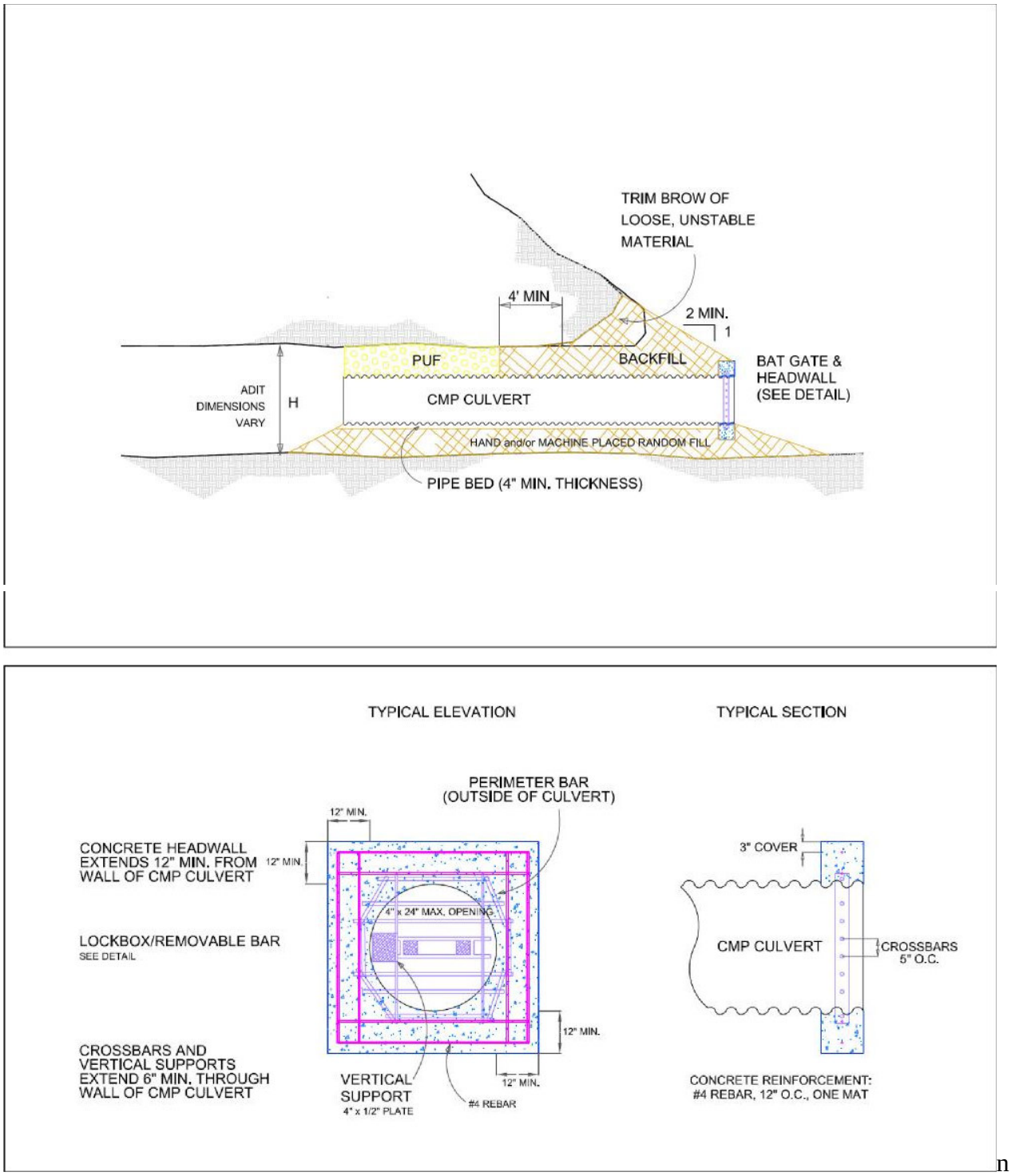


Figure 3. Recommended plans and details for culvert closures for MHP Adit 01 and Adit 09. Gates should be constructed of angle-iron, or 1 inch square stock steel.

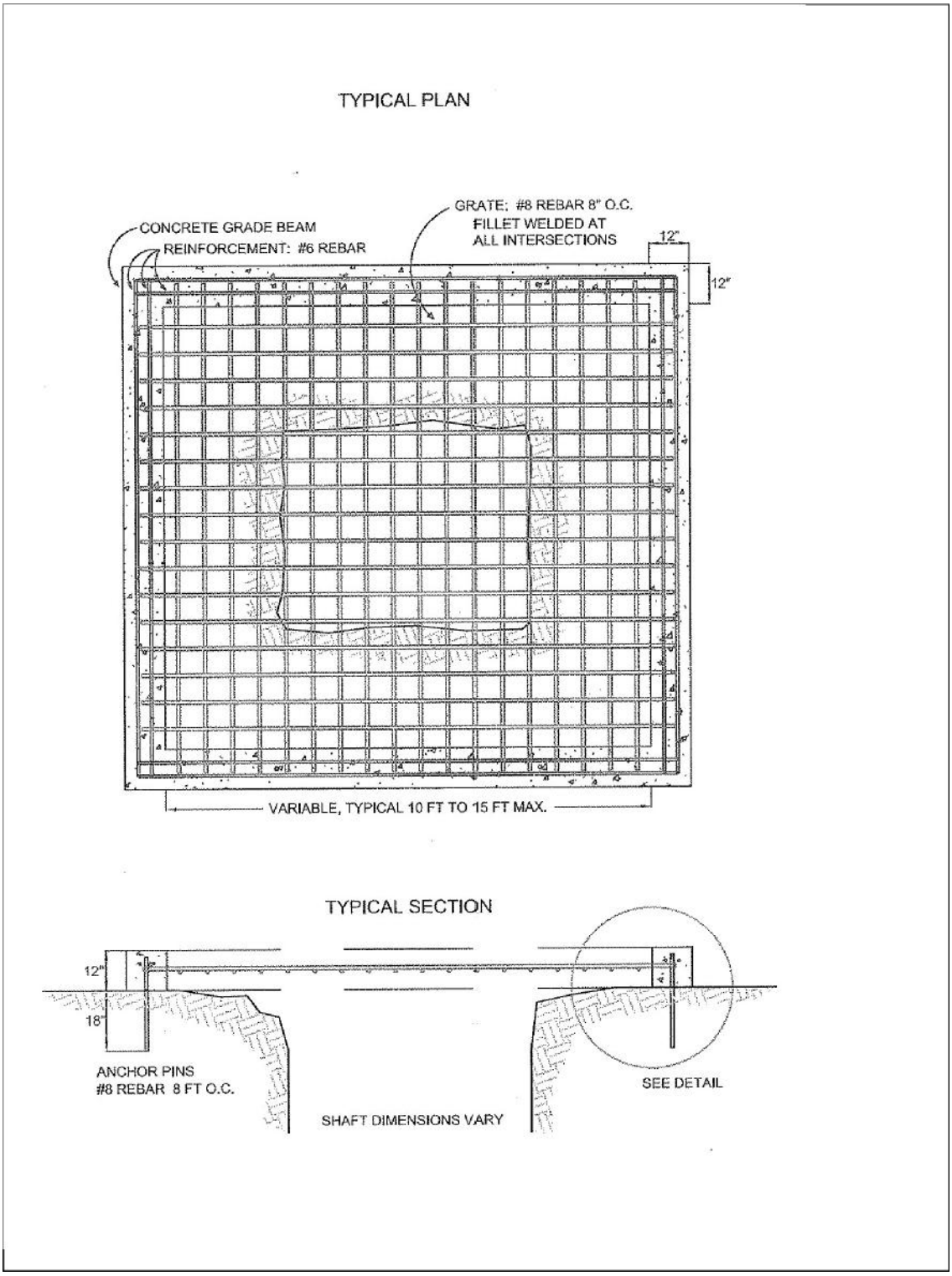


Figure 4. Recommended closure design for MHP Shaft 06. Grate materials should be constructed of either #08 rebar, 1 inch square stock steel, or angle iron as deemed most appropriate for structural integrity of the site.

APPENDIX E

MOUNT HOPE SOCIOECONOMIC SUPPLEMENTAL ANALYSIS AND ECSD DATA

BLANKENSHIP CONSULTING LLC

1820 E. Cedar Ave.
Denver, CO USA 80209-2626

(303) 765-2160
(303) 698-0108 (fax)
gblankenship@blankenshipconsulting.com

Memorandum

To: Angelica D. Rose
Planning & Environmental Coordinator
US BLM Battle Mountain District Office

From: George Blankenship, BCLLC & Ron Dutton, Sammons/Dutton LLC

Date: March 20, 2009

Subject: Supplemental information to address Eureka County concerns with the June 2, 2008 Mount Hope Project Socioeconomic Assessment

---

Eureka County has raised a number of issues and concerns regarding the June 2, 2008 Mount Hope Project Socioeconomic Assessment prepared by Blankenship Consulting LLC and Sammons/Dutton LLC (the socioeconomic assessment). This memo summarizes the process and results of efforts taken in consultation with Abby Johnson and Rex Massey, consultants to the Eureka County NEPA Committee, to address five areas of those concerns.

1. Mount Hope-related population estimates
2. The characterization of the southern Eureka County economy
3. The description of the Eureka utility infrastructure and existing deficiencies
4. The effects of the Mount Hope Project on the existing Whiskey Flats landfill
5. The assessment and portrayal of the fiscal conditions and potential effects of the project

The individuals identified above worked cooperatively to reach mutually acceptable understandings and resolutions to items #1 through #4. The results of those efforts are presented below. With regard to Item # 5, the group was unable to achieve a similar level of agreement. Consequently, we understand that Eureka County intends to submit additional information on fiscal impacts identified in their report, Eureka County Fiscal Impact Review and Analysis of the Mt. Hope Project (Research and Consulting Services, Inc., December 2008) for the BLM's consideration in the NEPA process. Item # 5 in this memo summarizes the findings of the County's fiscal assessment and identifies our general concerns associated with some of those findings.

1. **Mount Hope-related population estimates**: *Eureka County noted the uncertainties that exist with respect to the Mount Hope Project operations phase resident population projections and some of the household size, employee per household and school age children per household factors used in the socioeconomic assessment. The socioeconomic assessment assumed that 35 percent of the Mount Hope operations workforce would be comprised of households relocating to southern Eureka County and the remainder of the workforce would be comprised of daily and weekly commuters and local hires. The*

> *County expressed an interest in assessing the population effects of relocating households comprising a range of 30 to 50 percent of the operations workers.*
>
> *Eureka County also expressed concern about the assumption in the socioeconomic assessment that jobs in the local economy vacated by workers who chose to work at the mine would be filled by increases in labor force participation and the resulting expansion of the local labor force, given the current limited labor availability within the county.*

In response to these concerns, a review of the demographic and household assessment factors was conducted in consultation with the County's consultants and a series of sensitivity analyses (SA) were performed to assess the potential effects on total resident population and school age children of alternative demographic factors and residency assumptions. Per the consensus among the group, the sensitivity analyses focused on the operational phases of the project. The information presented below supplements section *3.2 Population* of the socioeconomic assessment, focusing on subsection *3.2.2 Operations Phase Population* and subsection *3.2.3 School Enrollment*.

Table 1 below summarizes the results of the sensitivity analyses and the following tables provide additional detail about each specific scenario developed as part of the sensitivity analysis process. In all, three scenarios were developed to bound the range of population and school enrollment effects that might reasonably be expected to occur. The population and school enrollment projections contained in the June 2, 2008 Final Mount Hope Socioeconomic Assessment (the socioeconomic assessment) submitted to the BLM are presented as the Base Case, to provide a point of comparison for the sensitivity analyses. The changes in assumptions associated with each sensitivity analysis scenario, include the following:

SA 1. Modified Base Case – Infill: SA 1 assumes the share of secondary jobs filled by relocating households would be 50% and the share filled by spouses/partners would be 45% compared to 45% and 50% respectively in the socioeconomic assessment. This analysis also assumes that existing local jobs assumed to be vacated by workers who accept jobs at the mine would be filled by additional relocating worker households. Infill jobs are not accounted for in the Base Case scenario.

Consistent with the socioeconomic assessment and other sensitivity analyses, SA 1 assumes an average of 1.3 jobs per relocating household. Because these relocating households are not expected to fill jobs directly associated with the mine, but rather fill other jobs in the local economy, SA 1 assumes an average household size mid-way between that used for the direct households and those associated with new indirect/induced jobs.

Finally, the projected number of mine-related school-age children in Eureka County during operations is presented as a range of 20% to 23% of the permanent resident population; a change from the 16% of combined resident and weekly commuting population assumed in the Base Case. The allocation of students between elementary and middle/high school students is also presented as a range; 50% to 70% elementary and 50% to 30% for middle/high school, a change from the 70%/30% assumption in the Base Case.

SA 2. 30 Percent Relocating Households: This analysis assumes that 30 percent of Mount Hope operations workers would relocate to Eureka County; compared to the 35 percent assumed in the socioeconomic assessment. All other population and household factors remain the same as those used in the socioeconomic assessment, except that the SA 2 scenario incorporates the same ranges of assumptions associated with school-age children described for SA 1 above. SA 2 provides the lower bound of population effects for the sensitivity analyses.

SA 3. 50 Percent Relocating Households: This scenario assumes that 50 percent of Mount Hope operations workers would relocate to Eureka County; compared to the 35 percent assumed in the socioeconomic assessment. It also assumes that all jobs vacated by existing local employees who accept employment at the mine would be filled by additional relocating worker households. SA 3 assumes that: the average operations worker persons per household (PPH) would be 2.85 compared to 2.64 in the socioeconomic assessment; the percentage of secondary jobs filled by relocation households would be 35% compared to 45% in the socioeconomic assessment to reflect the substantial increase in second workers associated with the increased number of direct worker relocations; and, the average persons per household (PPH) for relocating households filling secondary jobs would be 2.01 compared to 1.90 in the socioeconomic assessment. The SA 3 scenario incorporates the same ranges of assumptions associated with school-age children described for SA 1 above. SA 3 provides the upper bound of population effects for the sensitivity analyses.

Table 1 on the following page summarizes the key results of the sensitivity analyses, presenting comparative projections associated with different operational phases of the mine in a series of columns. The summary table is followed by more detailed tables showing the derivation of the results for each scenario.

The primary focus of the sensitivity analysis results is the column labeled "Full Production (Yrs. 1 – 10)". That column represents the potential impacts during the first ten years of operations, a period when the mine would achieve and maintain full production, creating long-term steady job opportunities conducive to household relocation, and to the creation of indirect and induced jobs in the community. As shown, the range of long-term projected population effects range from 584 to 795 residents, including weekly commuters, with a corresponding increase of between 83 and 161 school age children.

The corresponding range of effects during peak production, which is not anticipated to occur for more than two decades, is from 719 to 974 residents and between 103 and 198 school-age children.

One of the County's objectives in promoting the sensitivity analysis was to identify a range of potential population effects for long-term community planning purposes. Based upon recent demographic research, there appears to be a higher likelihood that the Mount Hope-related population growth and school enrollment effects would be closer to those associated with the Base Case or SA 1 than the lower or higher bound scenarios (SA2 or SA 3).

Note that the difference in county staff required to serve the relocating populations of either the high (SA2) or low (SA 3) population range would be relatively small and the difference in county equipment and infrastructure improvements needed to serve the population associated with either scenario would be similar to that required for the Base Case or Modified Base Case (SA 1).

Also note that although the Eureka County School District would need additional teachers to serve the incremental enrollment associated with the higher bound scenario (SA 3), the district's elementary and middle/high school facilities would be able to accommodate the projected incremental growth associated with all scenarios during all phases of the project, although the enrollment associated with the high end of the range for the highest bound scenario (SA 3) would exceed the optimum but not the maximum capacity of the middle/high school facility.

Table 1. Mount Hope Relocating Workers Sensitivity Analysis: Summary across Scenarios

			Operations				Final Processing, Reclamation & Site Closure (2-3 yrs.)
TOTAL POPULATION IMPACT							
Base Case: (Mount Hope Socioeconomic Study)	660	895	603	650	739	362	173
SA 1: Modified Base Case – Infill	660	895	678	729	830	405	196
SA 2: 30% Relocating HHLDs[1]	660	895	584	630	719	351	168
SA 3: 50% Relocating HHLDs[2]	660	895	795	853	974	472	231
SCHOOL AGE CHILDREN							
Base Case: (Socioeconomic Study)	26	37	96	105	118	58	28
SA 1: Modified Base-Case – In-fill[3]	26	37	106 - 122	114 - 131	130 - 149	63 - 73	31 - 35
Elementary (K-6)			74 - 61	80 - 66	91 - 75	44 - 37	16 - 18
Middle/High (7-12)			32 - 61	34 - 65	39 - 74	19 - 36	15 - 17
SA 2: 30% Relocating HHLDs[3]	26	37	83 - 96	90 - 104	103 - 118	50 - 58	24 - 28
Elementary (K-6)			58 - 48	63 - 52	72 - 59	35 - 29	17 - 14
Middle/High (7-12)			25 - 48	27 - 52	31 - 59	15 - 29	7 - 14
SA 3: 50% Relocating HHLDs[3]	26	37	140 - 161	151 - 173	172 - 198	83 - 96	41 – 47
Elementary (K-6)			98 – 81	106 – 87	120 – 99	58 – 48	29 – 24
Middle/High (7-12)			42 – 80	45 – 86	52 – 99	25 – 48	12 – 23

[1] Assumes 30 percent of Mount Hope operations workers relocate to southern Eureka County compared to 35 percent in the socioeconomic assessment. All other assumptions and multipliers are the same.

[2] Assumes 50 percent of Mount Hope operations workers relocate to southern Eureka County compared to 35 percent in the socioeconomic assessment. Also assumes that: the average operations worker persons per household (PPH) would be 2.85 compared to 2.64 in the socioeconomic assessment; the percentage of secondary jobs filled by relocation households would be 35% compared to 45% in the socioeconomic assessment to reflect the substantial increase in second workers associated with the increase in direct worker relocations in this scenario; and, the average PPH for relocating households filling secondary jobs would be 2.01 compared to 1.90 in the socioeconomic assessment to reflect the increase in persons per relocating household with families.

[3] The number of students enrolled in Eureka County schools is presented as a range of 20% to 23% of the permanent resident population and the allocation of students between elementary and middle/high school students is also presented as a range; 50% to 70% elementary and 50% to 30% for middle/high school.

Base Case (Mount Hope Socioeconomic Study)
Projected Mount Hope Project Eureka County Employment, Households, Population & Student Enrollment Effects

					Operations			Final Processing, Reclamation & Closure (2-3 yrs.)
1.	Construction Direct	GMI	378	625				
2.	Operations Direct		189	150	371	455	222	107
3.	Secondary jobs multiplier	Assumption	0.22	0.22	0.35	0.35	0.35	0.35
4.	Secondary Jobs	(#1 + #2) x #3	125	170	130	159	78	37
								144
6.	Local Labor & Daily Commuters[4]	Assumptions	18%	18%	20%	20%	20%	20%
7.	Jobs Filled by Local Labor & Commuters	#5 x #6	128	171	100	122	60	29
8.	New Non-Local Labor Needs	#5 - #7	568	774	401	492	240	115
9.	Avg. Jobs / Household (HHLD)	Assumption	1.12	1.12	1.36	1.36	1.36	1.36
10.	New HHLDs	#8 / #9	507	691	295	362	178	85
11.	Avg. HHLD Size[5]	Assumption	1.3	1.3	2.04	2.04	2.04	2.04
								173
13	Population in Construction Camp	GMI	284	470	0	0	0	0
14.	Population in Community	#12 - #13	376	425	603	739	362	173
15.	School Age Children (% of Pop.)	Assumption	4%	4%	16%	16%	16%	16%
								28
17.	Elementary Students (% Share)	Assumption	80%	80%	70%	70%	70%	70%
18.	Middle/High School (% Share)	Assumption	20%	20%	30%	30%	30%	30%
19.	Elem Students	#16 x #17	21	30	67	83	41	20
20.	Middle/High Students	#16 x #18	5	7	29	35	17	8

[4] Weighted average of construction, operations and secondary, which are disaggregated in Table 3.3, (note that this should read Table 20, and refers to the Mount Hope Project Socioeconomic Assessment).
[5] Reflects average household size for total workforce including single status construction workers and weekly commuters. Average household size for a relocating worker w/family is assumed to be 2.64. Average household size for a relocating secondary worker is assumed to be 1.9. Average household size for construction is assumed to be 1.3.

Sensitivity Analysis 1. Modified Base Case Assuming Added Relocation to In-Fill Positions Vacated by Local Hires

				Operations				Final Processing, Reclamation & Closure (2-3 yrs.)
1.	Construction Direct	GMI	SAME AS THE BASELINE ASSESSMENT					
2.	Operations Direct			371	400[6]	455	222	107
3.	Secondary jobs multiplier	Assumption		0.35	0.35	0.35	0.35	0.35
4.	Secondary Jobs	(#1 + #2) x #3		130	140	159	78	37
								144
6.	Local Labor & Daily Commuters[7]	Assumptions		20%	20%	20%	20%	20%
7.	Jobs Filled by Local Labor & Commuters	#5 x #6		100	107	122	60	29
7a.	In-fill Local Jobs to be Filled	Assumptions		44	47	54	26	13
8.	New Non-Local Labor Needs	#5 - #7 + #7a		445	480	546	266	118
9.	Avg. Jobs / Household (HHLD)	Assumption		1.36	1.36	1.36	1.36	1.36
10.	New HHLDs	#8 / #9		327	353	402	197	94
11.	Avg. HHLD Size[8]	Assumption		2.07	2.07	2.07	2.07	2.07
								196
13	Population in Construction Camp	GMI		0	0	0	0	0
14.	Population in Community	#12 - #13		678	729	830	405	196
14a.	Weekly Commuter	Assumption		148	160	182	89	43
14b.	Resident Population	Assumption		530	569	648	316	153
15.	School Age Children (% of Resident Pop. [*14b*])	Assumption		20% - 23%	20% - 23%	20% - 23%	20% - 23%	20% - 23%
								31 – 35
17.	Elementary Students (% Share)	Assumption		70% - 50%	70% - 50%	70% - 50%	70% - 50%	70% - 50%
18.	Middle/High School (% Share)	Assumption		30% - 50%	30% - 50%	30% - 50%	30% - 50%	30% - 50%
19.	Elem Students	#16 x #17		74 - 61	80 - 66	91 - 75	44 - 37	16 - 18
20.	Middle/High Students	#16 x #18		32 - 61	34 - 65	39 - 74	19 - 36	15 - 17

[6] Average
[7] Weighted average of construction, operations and secondary, which are disaggregated in Table 20 of the Mount Hope Project Socioeconomic Assessment).
[8] Reflects average household size for total workforce including single status construction workers and weekly commuters. Average household size for a relocating worker w/family is assumed to be 2.64. Average household size for a relocating secondary worker is assumed to be 1.9. Average household size for construction is assumed to be 1.3.

Sensitivity Analysis 2: 30% of Mt. Hope Direct Jobs Filled by Relocating Households

				Operations				Final Processing, Reclamation & Closure (2-3 yrs.)
1.	Construction Direct	GMI	SAME AS THE BASELINE ASSESSMENT					
2.	Operations Direct			371	400[9]	455	222	107
3.	Secondary jobs multiplier	Assumption		0.35	0.35	0.35	0.35	0.35
4.	Secondary Jobs	(#1 + #2) x #3		130	140	159	78	37
								144
6.	Local Labor & Daily Commuters[10]	Assumptions		20%	20%	20%	20%	20%
7.	Jobs Filled by Local Labor & Commuters	#5 x #6		100	107	122	60	29
8.	New Non-Local Labor Needs	#5 - #7		401	433	492	240	115
9.	Avg. Jobs / Household (HHLD)	Assumption		1.34	1.33	1.33	1.33	1.33
10.	New HHLDs	#8 / #9		300	325	369	181	86
11.	Avg. HHLD Size[11]	Assumption		1.94	1.95	1.95	1.94	1.95
								168
13	Population in Construction Camp	GMI		0	0	0	0	0
14.	Population in Community	#12 - #13		584	630	719	351	168
14a.	Weekly Commuter	Assumption		167	180	205	100	48
14b.	Resident Population	Assumption		417	450	514	251	120
15.	School Age Children (% of Resident Pop. [*14b*])	Assumption		20% - 23%	20% - 23%	20% - 23%	20% - 23%	20% - 23%
								24 - 28
17.	Elementary Students (% Share)	Assumption		70% - 50%	70% - 50%	70% - 50%	70% - 50%	70% - 50%
18.	Middle/High School (% Share)	Assumption		30% - 50%	30% - 50%	30% - 50%	30% - 50%	30% - 50%
19.	Elem Students	#16 x #17		58 - 48	63 - 52	72 - 59	35 - 29	17 - 14
20.	Middle/High Students	#16 x #18		25 - 48	27 - 52	31 - 59	15 - 29	7 - 14

[9] Average

[10] Weighted average of construction, operations and secondary, which are disaggregated in Table 20, Page 47 of the Mount Hope Project Socioeconomic Assessment.

[11] Weighted average household size for total workforce: 1.3 for construction and 2.04 during operations. These weighted averages include construction workers living in construction camps and single status weekly commuter operations workers with a household size of 1, relocating construction and operations workers with an average household size of 2.64 and relocating secondary workers with an average household size of 1.9.

Sensitivity Analysis 3: 50% of Mt. Hope Direct Jobs Filled by Relocating Households

				Operations				Final Processing, Reclamation & Closure (2-3 yrs.)
1.	Construction Direct	GMI	SAME AS THE BASELINE ASSESSMENT					
2.	Operations Direct			371	400	455	222	107
3.	Secondary jobs multiplier	Assumption		0.35	0.35	0.35	0.35	0.35
4.	Secondary Jobs	(#1 + #2) x #3		130	140	159	78	37
								144
6.	Local Labor & Daily Commuters	Assumptions		20%	20%	20%	20%	20%
7.	Jobs Filled by Local Labor & Commuters	#5 x #6		100	107	122	60	29
7a.	In-fill Local Jobs to be Filled[12]	Assumptions		44	47	54	26	13
8.	New Non-Local Labor Needs[13]	#5 - #7		445	480	546	266	118
9.	Avg. Jobs / Household (HHLD)	Assumption		1.41	1.41	1.41	1.41	1.41
10.	New HHLDs	#8 / #9		307	331	377	184	89
11.	Avg. HHLD Size[14]	Assumption		2.58	2.57	2.58	2.56	2.60
								231
13	Population in Construction Camp	GMI		0	0	0	0	0
14.	Population in Community	#12 - #13		795	853	974	472	231
14a.	Weekly Commuter	Assumption		93	100	114	56	27
14b.	Resident Population	Assumption		702	753	860	416	204
15.	School Age Children (% of *14b*)	Assumption		20% - 23%	20% - 23%	20% - 23%	20% - 23%	20% - 23%
								41 – 47
17.	Elementary Students (% Share)	Assumption		70% - 50%	70% - 50%	70% - 50%	70% - 50%	70% - 50%
18.	Middle/High School (% Share)	Assumption		30% - 50%	30% - 50%	30% - 50%	30% - 50%	30% - 50%
19.	Elem Students	#16 x #17		98 – 81	106 – 87	120 – 99	58 – 48	29 – 24
20.	Middle/High Students	#16 x #18		42 – 80	45 – 86	52 – 99	25 – 48	12 – 23

[12] Assumes that all jobs vacated by existing local employees who accept employment at the mine would be filled by additional relocating worker households.
[13] Assumes that the percentage of secondary jobs filled by relocation households would be 35% compared to 45% in the socioeconomic assessment
[14] Assumes average operations worker PPH of 2.85 & average relocating households filling secondary jobs PPH of 2.01 compared to 2.64 & 1.90 respectively in the socioeconomic assessment.

2. *Eureka County feels that the baseline report describes Eureka as more of a "boom and bust" mining community like Battle Mountain, than a "quieter agricultural community," and they would like to see that description changed.*

In response to Eureka County's concern, we offer the following supplement to the socioeconomic assessment, which restates section 2.2 *Social and Economic Setting*.

2.2 Social and Economic Setting

Eureka County is the second least populous county in Nevada with a 2006 estimated population of 1,460 (Nevada State Demographer 2007) and a 2005 resident population density of 0.35 persons per square mile.

The unincorporated town of Eureka, the county seat and largest community in the county, is located in the southern portion of the county. The communities of Beowawe and Crescent Valley are located in the northwestern portion of the county. Farm and ranch households reside on agricultural operations throughout the county (Eureka County 2006a).

The town of Eureka initially developed in conjunction with the mining industry, but has been sustained through the years by the agricultural industry. Although there have been good and bad years, agriculture, principally alfalfa and hay farming, cattle ranching, and to a lesser extent sheep ranching, have historically provided a relatively stable base for the Eureka County economy.

The history of farming in Eureka County is described in the Land Use element of the Eureka County Master Plan as follows.

Development of the mines brought sheepmen, cattlemen and other settlers who settled in the valleys in Eureka County. Government land programs, including the 1877 Desert Lands Act, the Act of 1888, the Act of 1890, the 1891 Creative Act, and the 1916 Stock Raising Homestead Act, established privately-owned base properties to support permanent range livestock operations and farms

Farming was limited to native sub-irrigated meadows and lands irrigated by diverted surface water until supplemental flowing wells were drilled on the Romano Ranch in 1948 and the Flynn Ranch in 1949. In 1949 two irrigation wells were drilled in Diamond Valley in an effort to develop land under Desert Land Entry. By the mid 1950s, pumped irrigation wells were being developed in southern Diamond Valley, Crescent Valley and Pine Valley. By 1965, some 200 irrigation wells had been drilled in Diamond Valley alone. Today, Eureka County's farming districts support a robust grass, alfalfa and meadow hay industry (Eureka County 2006a).

European settlement of the area around Eureka began with the discovery of silver-lead deposits near the present town site in the 1860s. Improvements in smelting processes led to a mining boom in the county. By 1878, Eureka was the state's second largest city with a population of over 7,000 and a railroad that connected the town with Palisade to the north. As ore bodies played out Eureka lost most of its population, although mining activity continued around Eureka through the latter part of the 1800s and up until about 1920. From that time until the late 1980s when the Atlas Gold Bar mine began operations, little mining activity occurred in southern Eureka County.

Mining currently plays a large, yet complex role in the economy and culture of Eureka County. The two largest gold mining operations in the state, Barrick Goldstrike's Betze/Post Mine and Newmont Mining's Carlin Trend Complex, are located in northern Eureka County, yet most of the economic activity associated with these mines accrues to Elko County, which is also home to most of the employees. Mining again became a major economic influence in southern Eureka County in 1997 with the development of the Ruby Hill mine adjacent to the Town of Eureka. However, population related impacts were somewhat limited because a number of local residents were able to secure jobs at the mine. Southern Eureka County experienced an economic and population contraction when the Ruby Hill mine ceased mining in 2002 and experienced a modest economic surge when the East Archimedes expansion of the Ruby Hill mine opened in 2006.

Economic and social conditions in Eureka County have also been affected indirectly by mining development in the northern part of the county, which has occurred for over 50 years and began to accelerate during the mid 1980s. The tax revenues that Eureka County and the Eureka County School District have received from the mines in the northern part of the County have allowed the County and the School District to construct new facilities and expand public services throughout the county including the communities of Eureka and Crescent Valley. The influence of the mining revenues from the northern part of the county are reflected in levels of employment, local government spending for goods and services, and county and school district service provision that are higher than would be available without the tax revenues from the northern mines.

Along with agriculture and mining, the legacy of mining's early glory now forms the basis for an emerging third facet of Eureka's economy; a tourism and recreation industry supported by historic attractions, restored buildings and the area's striking natural setting.

As demonstrated by the foregoing, the economy of Eureka County is natural resource-based. Farming, ranching, mining and tourism/recreation all rely on the land and its resources. The traditional uses of these resources complement each other for the most part. Farming and ranching provide a stable population base and support a basic level of local commerce. Mining in the north and periodic surges in mining development in the southern part of the county provide economic activity and local government revenue, which the county has used to upgrade public infrastructure and restore historic buildings and streetscapes. This restoration coupled with the scenic setting and recreation resources have attracted tourists, which in turn, support commercial infrastructure and provide a modest level of local government sales tax revenue.

Although residents are interested in economic development, the increasing urbanization occurring elsewhere in the state, increased environmental and land use regulation by federal land management agencies and the social, economic dislocation and other costs of the bust side of mining booms have "galvanized (Eureka County) residents and their elected representatives to seek mechanisms to manage growth and influence resource management." The county considers these actions "necessary to maintain and enhance local economic security and the rural quality of life which has long typified Eureka County" (Eureka County Economic Development Council 2006).

Additionally, we suggest that section *2.3.1 Employment* of the socioeconomic assessment should be clarified as follows:

- The first sentence of the first paragraph under section 2.3.1 should be replaced by the following sentence:

  > "As might be expected, mining dominates the northern Eureka County economy in terms of employment and earnings. This dominance is reflected in the Eureka County employment by place of work statistics, but not in the employment by place of residence statistics discussed in section 2.3.2, which are more reflective of the much smaller and more recent mining presence in southern Eureka County."

- The first sentence of the second paragraph under section 2.3.1 should be amended to read:

  > "During the peak employment year of 1997, total employment reached 5,321, driven by record high mining employment of 4,374, which included the startup operations for the Ruby Hill mine in southern Eureka County, although that mine accounted for less than three percent of total mining jobs in Eureka County that year."

- The third sentence in the second paragraph under section 2.3.1 should be amended to read:

  > "Mining employment subsequently fell to 2,903 in 2004."

- The last sentence in the second paragraph under section 2.3.1 should be deleted.

- The paragraph immediately following Figure 3 on page 9 should be moved up to follow the second paragraph under section 2.3.1 Employment.

- The following sentence should be added to the end of the first footnote under Table 3.

  > "The vast majority of these mining jobs have been located at mines in the northern part of Eureka County."

3. *Eureka County is uncomfortable with the description of the Eureka utility infrastructure in terms of the description of existing deficiencie*s.

In response to this concern, we offer the following supplement to the socioeconomic study. This information would supplement section *3.4.8 Community Infrastructure/Public Works Department* on page 62. Specifically, the following paragraph should be inserted as a third paragraph following the existing two paragraphs at the beginning of section 3.4.8.

> Although the *Master Plan for the Town of Eureka Water and Sewer Systems and Devil's Gate GID (District 1& 2) Water Systems* identifies a number of existing deficiencies, not all of the improvements identified to correct these deficiencies would have to be implemented immediately. These identified improvements to the existing system would also be necessary to serve new population demands. According to County officials, the Town of Eureka water and sewer systems are largely adequate for the demand they presently serve and are not under any regulatory requirements for improvements. The Devil's Gate GID District 2 is deficient in compliance with the

Arsenic Rule. The GID board is in the process of making necessary improvements to bring the present system into compliance.

4. *Eureka County would like an expanded discussion of the effects of the Mount Hope Project on the County's Whiskey Flats Landfill.*

To address this concern, we offer the following supplement to the socioeconomic study. This information references section *3.4.8 Community Infrastructure and Services*, subsection *Solid Waste Disposal* on page 63. Specifically, we suggest that the first paragraph in the *Solid Waste Disposal* subsection be restated as follows.

> Demand from the population associated with the Mount Hope Project will reduce the remaining life of the Class II-rated (less than 20-tons per day) Whiskey Flat landfill, but the landfill capacity should be adequate through construction and much of the project's initial operations period. The anticipated increase in Eureka County population associated with the Mount Hope Project during the first 20 years would be about 40 to 45 percent of Eureka County's 2007 population. It is important to note that the Whiskey Flat landfill serves all areas of Eureka County's population, either through waste collection services or directly. With the expansion of the Mount Hope residential subdivision, regular solid waste collection will increase substantially. Additionally, waste from the Mount Hope subdivision construction will also utilize capacity in the landfill. Consequently, assuming similar rates of solid waste generation, the project would shorten the anticipated 30 years of remaining land fill life to just over 20 years. Additional operating staff and/or equipment may be necessary to accommodate the increased volumes of solid waste.

5. *Eureka County is concerned about the extent to which local government expenditures were identified and described in the socioeconomic assessment. Eureka County is uncomfortable with the way the Socioeconomic Assessment portrays County fiscal conditions and believes the assessment portrays the county as having "lots of money and can just fix any impacts." Eureka County has developed preliminary cost estimates to meet the service demands associated with projected Mount Hope-related population growth. (Eureka County Fiscal Impact Review and Analysis of the Mt. Hope Project, Research and Consulting Services, Inc., December 2008).*

   The County's analysis outlines the incremental increases in Eureka County government employees, operational expenses and capital improvements to address direct and indirect impacts of the Mt. Hope Project. Generally, the estimated needs are based on the projected population growth when the project is at full production.

   The County's fiscal assessment provides estimates of additional staffing requirements and associated operating costs, based on the judgment of County service administrators. The County's fiscal assessment estimates incremental staff needs of as many as 24 full-time equivalent employees.

   Eureka County's fiscal assessment estimates gross annual operating costs, a large portion of which would be the payroll costs associated with staff, at just over $2.0 million. The total does not include any additional costs that could be associated with operations of the local health clinic, but neither does it reflect allowances for increased revenues derived from services. The fiscal assessment notes that the water system operating costs could increase substantially if arsenic treatment is required for new

water sources. The operating costs are largely variable and could change based upon the actual impacts on service demands and future decisions regarding levels of service by the Board of Eureka County Commissioners.

Eureka County's fiscal assessment outlined a number of capital improvements required to address estimated service demands related to population growth from the proposed Mount Hope Project. The combined costs of those improvements are estimated at about $7.2 million. Some of these costs would occur prior to, or concurrently with, project construction, others would occur later in time as the project operations continue. The major capital expenditure estimates developed by Eureka County are summarized below and are separated into two groups; those improvements supported by general revenue sources and those capital costs associated with utility operations that are supported largely by revenues collected from system users.

- *Capital Costs-General Revenue Sources*

Jail Expansion	*$1,500,000*
Adm. Improvements-Sheriff's Office	*$ 750,000*
Landfill Capacity	*$ 720,000*
Major Equipment	*$ 860,000*
Other Improvements and Equipment	*$ 150,000*
Total	*$3,980,000*

Eureka County's fiscal assessment noted that recreation related impacts and those associated with local street and highway improvements are unknown.

- *Capital Costs-Funded By Users*

The County's fiscal assessment allocated the following costs to the Mount Hope Project-related population based on projected population impacts.

Wastewater Treatment Capacity	*$ 969,500*
Allocated Water Storage Capacity	*$ 990,345*
Pump Station-Water System	*$ 315,000*
Outfall Pipe-Wastewater Treatment	*$ 777,600*
Effluent Disposal-RIBS	*$ 200,000*
Total Costs	*$3,252,445*

Regarding Eureka County's concerns with the fiscal section of the socioeconomic study, we offer the following. Eureka County's fiscal impact estimates contain a number of major improvements that the County believes are required to accommodate mine related growth. County services and staffing could also increase substantially as a result of mine related development. However, some of the items identified in the County's fiscal assessment may in part address existing needs or provide higher levels of services to current residents of the community. Others would likely be funded at least in part by developers or by user fees. Moreover, it is possible that more detailed studies and continued cooperative efforts between GMI and the County could identify alternative approaches or reduce the costs to meet some of the County's identified needs.

Eureka County's fiscal assessment was limited to potential County expenditures associated with Mount Hope Project demand. However, as noted in the socioeconomic assessment, the Mount Hope Mine will generate an estimated $9.5 million in Basic and Supplemental City-County Relief tax (sales and use tax) revenues during the construction phase of the project that would effectively defray the County's initial capital costs. Over the long term, the estimates of projected on-going revenues from ad valorem and sales and use taxes of over $1.9 million annually, combined with even a modest amount of revenue from net proceeds of mining taxes from the mine, would be sufficient to offset the County's estimates of operating costs.

Finally, we reiterate the statement contained in section 3.6.2 of the socioeconomic assessment … "It is anticipated that GMI and Eureka County will work cooperatively to identify and quantify specific staff, equipment and capital needs to accommodate the project-related demand."

Table 3.17-23 Page 3-509: The table shows that only 16 percent of the relocating population is school aged children. Actual numbers associated with the suspension of mining at Ruby Hill suggest that the number of school aged children associated with a mining population could be as high as 32% resulting in more than 190 school children being associated with the Mt. Hope population. The 32 percent was derived by school enrollments and the population declines that occurred in the 2002-2003 timeframes.

We appreciate the observation made by the commenter. The ratio of 16 percent of incremental school enrollment to relocating population derived by the commenter from Table 3.17-23 is based on the total population associated with the Mount Hope project. Total population includes weekly commuters who are assumed to travel to the Eureka area each week in single status and return to their homes outside of the Eureka area during their days off. These workers are assumed to be in the area without households or school age children. For the period covered in the table, weekly commuters are assumed to be 40 percent of the workforce.

Regarding the 32 percent decline in enrollment associated with suspension of operations at the Ruby Hill mine, the single-year observation based on estimated population change and changes in total enrollment in a small school district essentially ignores broader long-term demographic trends affecting public education enrollment in general, and more specifically across Nevada. A more detailed analysis of such trends suggest that the 16% assumed in the base analysis is reasonable (particularly considering assumed the number of single status workers in the population), while at the same time providing no basis for assuming that students would account for 32% of the resident population. Furthermore, a sensitivity analyses completed in cooperation with Eureka County (see Appendix D) explored the implications of enrollment/population ratios as high as 23% (higher than the highest observed rate in the state in 2010). The conclusions of that analysis were that the ECSD may need to hire additional staff but that the enrollment would be within the maximum capacity of the existing facilities.

The basis for the finding presented above regarding the lack of support for an assumption that as many as 32% of new residents would be school age children include the following:

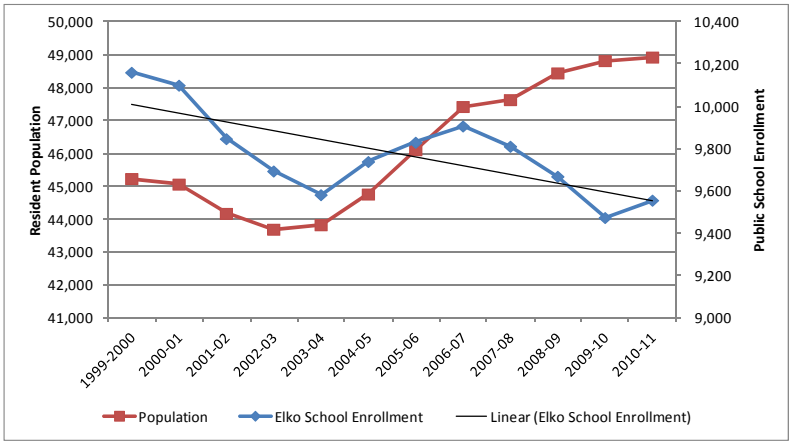
1) The average household size among Americans has been declining. In Eureka County the average household size declined from 2.48 to 2.38 between 2000 and 2010. In Elko County the decline was even greater; from 2.97 to 2.77. Statewide the average household size was 2.65. Note: at the request of Eureka County, the sensitivity analysis assumed an average household size of as high as 2.85, which effectively resulted in an upward bias in the projections, even assuming the 16% ratio.
2) The 2002/2003 declines in enrollment continue a trend in declining enrollment in the ECSD that began in 1998–99. Between then and the suspension of mining at Ruby Hill, enrollment in the district declined 24 percent. Moreover, when mining resumed at Ruby Hill, enrollment remained relatively flat, increasing only 8 percent during a period when over 100 workers were added to the mine's workforce.
3) Statistics involving small groups can be skewed by changes and events involving a relatively small number of units, e.g., households, or reflecting other unique demographic situations; the progression of the "baby boomer" generation through public schools, colleges/universities, into the work force, and now into retirement is one of the best examples of such phenomena. At the local level, year-to-year changes may reflect the graduation of an unusually large class, as happened between 2009-10 and 2010-11, a smaller or larger intake of K and 1st graders, or perhaps even the distribution of students within Eureka County such that a drop in enrollment could reflect differences in the number of student in Crescent Valley going to Elko. The extent to which the commenter examined whether such changes factored into the observed decline is unclear.

4) Public school enrollments have been declining across rural Nevada, including in Elko County, both in absolute terms but even more so as a percentage of total resident population.

The following figures highlight the complexities and dynamics associated with projecting long-term school age enrollment.

Figure A displays resident population and public school enrollment changes in Elko County between 2000 and 2010, and the overall trend in public school enrollment.

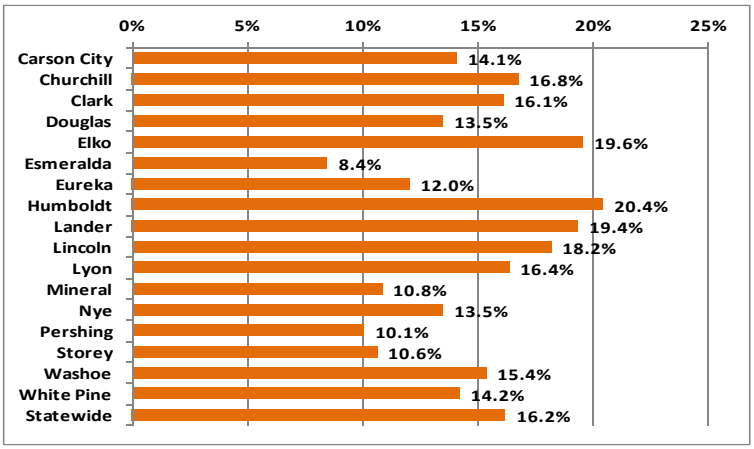
Figure A: Elko County Population and Public School Enrollment Trends



Of particular interest in Figure A is that during the span of a single decade, public school enrollments moved in the same direction as population change, both in an upward and downward direction, but also declines even as population increased sharply. Also, the rate of change in enrollment during the rapid growth period 2003-04 to 2006-07 averaged less than 14%. Moreover, total enrollment (noted by the line lableled "Linear") has trended downward over the past decade.

Figure B displays the current ratio of public school enrollments to resident population for all Nevada counties and the state as a whole in 2010. Across the state, the average ratio was 16.2%.

Figure B: Ratio of Public School Enrollment to Population in Nevada in 2010



Among the counties, 4 recorded student/population ratios substantially above the statewide average, but none approaching the 32% suggested by the commenter. Interestingly, 3 of the 4 have experienced mining-related population growth in recent years, some of which is thought to represent the type of daily or weekly commuting by heads of families expected at Mt. Hope. To the extent that this is true, the reported ratios in those 3 counties are higher than they might otherwise be.

Figure C shows the long-term trend in student/population ratios in rural Nevada between 2000 and 2010. For the purposes of this analysis, "rural" Nevada includes all counties except Clark and Washoe, and Carson City. As shown, the overall average has declined sharply from 19.6% to 16.2%. Interestingly, among Nevada counties, only Clark County experienced an increase in student/population ratios during the period 2000 – 2010, and that was only from a 2% change.

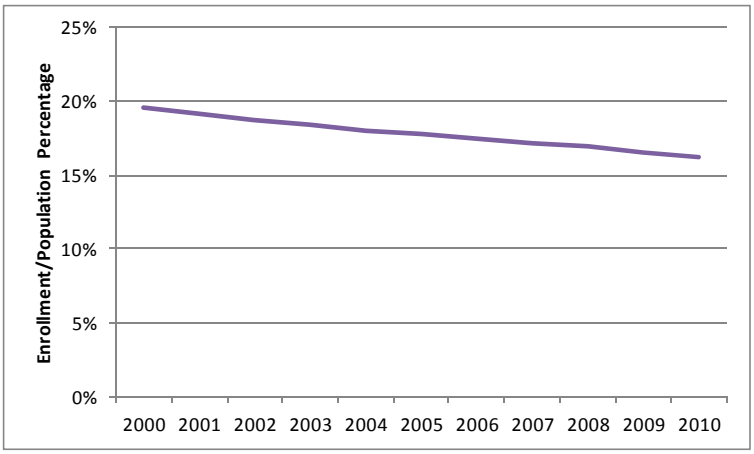


Figure C: Ratio of Public School Enrollment to Population in Rural Nevada between 2000 and 2010

As noted above, this information indicates there is little basis for assuming that students would account for 32% of the resident population. Furthermore, the sensitivity analyses completed in cooperation with Eureka County (see Appendix D), exploring the implications of enrollment/population ratios as high as 23%, concluded that the ECSD may need to hire additional staff but that the enrollment would be within the maximum capacity of the existing facilities.

=====

3.17.3.3.5 Page 3-525: The last paragraph of page 3-525 is confusing. It first mentions $22.1 million of LSST then $11.1 million of LSST for ECSD. If $11 million of LSST is part of the states total of $30.7 million, it should be better explained. If not, it would appear that there is some discrepancy.

The text on Page 3-525 is accurate, but could be more clearly written. The $11.1 million accruing to the ECSD is not part of the state's total of $30.7 million, but rather represents 50% of the total LSST. We would propose the following revisions.

"Total sales and use tax revenues during construction and thru year 10 of operations are projected at $63.9 million. The total includes $22.1 million in LSST, $4.9 million in BCCRT, $17.2 million in SCCRT, and

$19.7 million in state sales tax. Of the total, Eureka County is project to realize $22.1 million in BCCRT and SCCRT, an estimated $11.1 million in LSST revenue (50% of the total) would accrue to the ECSD, and the State of Nevada would realize $30.7 million in LSST and state sales and use tax revenue."

=====

4.9 Page 4-102: This still focuses primarily on economic benefits and does not give enough weight to fiscal impacts or social disruption. There is substantial operations and maintenance required to keep up the infrastructure upgrades related to the Project. This is a long-term commitment and could be a major impact once the Project ceases. Further, Nevada is full of stories of boom and bust and the irreversible and irretrievable impacts related to the bust often outweighs any positive impacts related to the boom. Please consider this in the description.

"Booms" occur when a particular industry – such as mining – undergoes a rapid and large-scale expansion resulting in economic and population growth for a particular community or geographic area. "Busts" occur when there are substantial contractions in that industry, resulting in correspondingly substantial reductions in employment and in many cases, population. Busts can result unexpectedly from declines in commodity prices or other factors, or they can result from planned closures when a particular resource is fully produced. In the latter case, communities have advance notice and time to prepare for the effects of the bust.

Section 3.17.3.3.4, Public Utilities and Services Effects, and the subsection on Project-Related Expenditures in Section 3.17.3.3.5, Public Fiscal Effects, discuss the infrastructure and service expansions and operations and maintenance requirements associated with development of the Mount Hope project in some detail. The Public Sector Fiscal Effects subsection also discusses the effects on Eureka County if the Mount Hope project did not proceed, was delayed, or was prematurely terminated.

The boom and bust cycles that have been experienced by many communities in Nevada, while alternately providing periods of economic and fiscal opportunity and hardship on those communities and their residents, have not in all cases been either irretrievable or irreversible. The Town of Eureka has experienced several boom and bust cycles dating back to its origins, and has over time recovered from each bust. Moreover, no community or industry is immune to periodic downturns in economic conditions, as witnessed by the recent global recession that had particularly severe effects in certain areas of Nevada including the Las Vegas metropolitan area. If the Mount Hope Project endures for its projected 44-year mine life, the expenditures required to develop the public infrastructure in support the mine-related population will likely have been repaid several times over. Moreover, although closure (planned or premature) could result in economic dislocation and public service staff reductions, the housing and public infrastructure would be available to support other economic activities such as other mining and geothermal projects, retirement and lifestyle migration or expansion of the tourism and outdoor recreation economy.

The adverse effects of mining busts do not in all cases or for all parties outweigh the beneficial effects of mining booms. The infrastructure created by booms in some cases has served other purposes. For example in Eureka, the historic mining booms resulted in construction of a number of buildings, which have recently been rehabilitated and are now assets for residents and for the community's heritage tourism initiatives. Additionally, the recent boom in gold mining in the northern part of the county has allowed the county to fund improvements in infrastructure and build

up fiscal reserves that can be used for a variety of other purposes. Those improvements and possibly reserves will ease the transition when mining in the northern part of the county ceases. Moreover, the Mount Hope mine, because it relies on a different commodity than the northern mines, would provide an ongoing source of employment and revenue during the transition when mines in the northern part of the county cease operations.

APPENDIX F

NATIVE AMERICAN CONSULTATION DOCUMENTATION

Mount Hope Project Native American Contact List

Name of Tribe or Other Group	*Date of Contact*	*Follow-Up Contact*
Battle Mountain Band of the Te-Moak Tribe of Western Shoshone	February 6, 2007	March 14, 2007 July 25, 2007 July 27, 2007
Bridgeport Indian Colony (request by tribe)	July 25, 2007	
Bureau of Indian Affairs	February 6, 2007	
Duck Valley Shoshone-Paiute Tribes of Idaho and Nevada	February 6, 2007	
Duckwater Shoshone Tribe	February 6, 2007	March 14, 2007 July 17, 2007 July 24, 2007 July 26, 2007 July 30, 2007 July 31, 2007 August 15, 2007 September 6, 2007 September 19, 2007 September 24, 2007 September 27, 2007 October 1, 2007 October 2, 2007 October 9, 2007 October 10, 2007 October 16, 2007 October 27, 2007 November 16, 2007 December 19, 2007 January 30, 2008 February 12, 2008 February 21, 2008 February 28, 2008 March 4, 2008 March 21, 2008 April 1, 2008 April 14, 2008 April 30, 2008 May 1, 2008 May 30, 2008 June 2, 2008 June 6, 2008 June 22, 2008 August 4, 2008 August 25, 2008 October 2, 2008 January 6, 2009 February 2, 2009 March 4, 2009 September 8, 2009 December 1, 2009 February 23, 2010 March 2, 2010 March 22, 2010 April 12, 2010 June 21, 2010 August 2, 2010 August 31, 2010 September 1, 2010 September 3, 2010 September 9, 2010 October 12, 2010 December 1, 2010 January 1, 2011 January 18, 2011 February 17, 2011 August 30, 2012
Elko Band of the Te-Moak Tribe of Western Shoshone	February 6, 2007	July 25, 2007 August 8, 2007 August 28, 2007 September 6, 2007
Ely Shoshone Tribe	February 6, 2007	July 24, 2007 March 21, 2008 April 15, 2008 September 25, 2008
Southfork Band	February 6, 2007	January 12, 2007 April 2, 2007 May 8, 2007 July 24, 2007 September 6, 2007
Summit Lake Paiute Tribe (request by tribe)	March 27, 2007	
Te-Moak Tribe of the Western Shoshone	February 6, 2007	July 25, 2007 March 21, 2008
Timbisha Shoshone Tribe	February 6, 2007	
Wells Band of the Te-Moak Tribe of Western Shoshone	February 6, 2007	February 13, 2007 May 8, 2007 June 14, 2007 July 20, 2007 July 24, 2007
Western Shoshone Committee of Duck Valley	February 6, 2007	
Western Shoshone Defense Project (WSDP)	February 6, 2007	
Yomba Shoshone	February 6, 2007	March 14, 2007 July 24, 2007 March 21, 2008 September 10, 2008
Western Shoshone Descendents of Smoky Valley (Site visit with Felix Ike)		July 22, 2009

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Mount Lewis Field Office
50 Bastian Road
Battle Mountain, Nevada 89820
http://www.nv.blm.gov

TAKE PRIDE IN AMERICA

DEC 01 2009

In Reply Refer To:
3809 (NVB0100)
NVN-082096
NV063-EIS07-019

CERTIFIED MAIL: 7002 2410 0000 7639 7275 RETURN RECEIPT REQUESTED

Virginia Sanchez - Chair
Duckwater Shoshone Tribe
P.O. Box 140068
Duckwater, Nevada 89314

Dear Ms. Sanchez:

The Bureau of Land Management (BLM), Mount Lewis Field Office, proposes to re-engage the Duckwater Shoshone Tribe in discussions concerning the Eureka Moly LLC Mount Hope Molybdenum Mine plan of operations. You may have been involved in the past as a former Council member. As the recently elected Chairperson, I would like to extend an invitation to meet with you, if the Duckwater Shoshone Tribe still wishes to participate in the project. I will provide a brief timeline of past coordination/communications specific to this project and the tribe.

Consultation with area tribes was initiated on February 6, 2007, with a certified letter to tribal Chairs and designated staff. The initial letter described the project location, proposed activities, introduced the contracted ethnographer, and asked for any resource issues/concerns the tribe may have, along with meeting/field tour dates.

After a considerable review and comment period and multiple follow up phone calls, a field visit was arranged for September 27, 2007, with the Duckwater Shoshone Tribe. The BLM sent a follow up letter on October 17, 2007, describing the topics of discussion during the September 2007 field visit and inviting the tribe to enter into a data sharing agreement or Memorandum of Understanding (MOU). Field visits continued to occur with various interested tribal entities and community members.

During the Duckwater field visit, general issues/concerns discussed were: impacts to archaeological/cultural resources, impacts to spring sources and pine trees, visual intrusions, cumulative effects study areas, and potential economic opportunities. As was understood by this office, the Duckwater Shoshone Tribe was to formally respond in writing soon after the September 27, 2007, field tour. Also discussed during the field visit was the opportunity for the Duckwater Tribe to review cultural resources inventory reports.

On March 21, 2008, a letter was sent from this office to the Duckwater Shoshone Tribe inviting the tribe to participate as a concurring party to a Programmatic Agreement (PA) between the BLM Battle Mountain Office and the Nevada State Historic Preservation Office (SHPO) regarding the treatment of historic properties. At the time, the tribe declined the invitation and chose to continue to work toward developing a separate data sharing agreement or Memorandum of Understanding (MOU) with the BLM.

On November 25, 2008, BLM received Resolution No. #08-D-33 and attached MOU both signed by Chairman Millet on August 25, 2008.

A letter was sent to the tribe from this office on February 2, 2009, in response to Resolution No. #08-D-33. This resolution supported the signing of an attached MOU. However, the signed MOU appeared to be an older version, which did not include input from this specific office. Our staffs developed several draft MOUs; however, it was decided by the tribe that a BLM Nevada Statewide MOU was preferred over a District, Field Office, or Mount Hope project specific MOU. I am not aware of the tribe's progress in developing a statewide agreement with our BLM Nevada State Office.

A historical background was also sent to the tribe in September 2009 titled, *Historic and Prehistoric Occupation in Central Nevada: Mount Hope, Eureka County, Nevada.*

We are currently developing a Draft Environmental Impact Statement for public review and comment with a target completion date of April 2010. We have not received any further input or participation from the Duckwater Shoshone Tribe, who, until recently, has been actively participating in the permitting process.

Please feel free to contact Gerald Dixon at 775-635-4161 if you have any questions or wish to schedule a project briefing, status update, or to continue our partnership development. I ask that you please respond within 30 days upon your receipt of this letter.

Sincerely,

/s/ Douglas W. Furtado

Douglas W. Furtado
Field Manager
Mount Lewis Field Office

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Mount Lewis Field Office
50 Bastian Road
Battle Mountain, Nevada 89820
http://www.nv.blm.gov

TAKE PRIDE IN AMERICA

GD 1-28-09

FEB 0 2 2009

In Reply Refer To:
NVN-082096
NV063-EIS07-019
3809
(NV-063)

CERTIFIED MAIL: 7008 0150 0001 6431 7209 RETURN RECEIPT REQUESTED

Jerry Millet – Chair
Duckwater Shoshone Tribe
P.O. Box 140068
Duckwater, Nevada 89314

Dear Chairman Millet:

I am in receipt of Duckwater Shoshone Tribal Resolution No. #08-D-33, which was signed by you on August 25, 2008, supporting a memorandum of understanding (MOU) between the Tribe and this office for the proposed Mount Hope Molybdenum mining operation near Eureka, Nevada. An MOU was attached to this resolution and also signed by you on August 25, 2008.

I appreciate your review of this MOU and the time invested presenting to your Council and gaining their vote during the August 25th, 2008, Council meeting. However, it appears an earlier draft version of the MOU was signed. It was my understanding that both our staffs had drafted numerous versions of the MOU for information sharing and had finally compiled those drafts into a single project specific version that met both the Tribe's and BLM's needs. This office's management team reviewed and endorsed this particular draft version of the MOU, but the MOU signed by you on August 25, 2008, is not the version we had reviewed.

For your convenience, I have attached the most recent version of the MOU/Information Sharing Agreement for the Mount Hope project along with the documents received by this office on November 25, 2008. I ask that you please review these documents and contact me or Gerald Dixon of my staff at 775-635-4000, at your earliest convenience, if you require further information. I look forward to entering into an MOU/information sharing agreement with the Tribe for this very complex project.

Sincerely,

Gerald M. Smith
District Manager

Attachments:
Cc: Annette George Harris
Maurice Frank Churchill

Gdixon:GD1/28/09

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Battle Mountain Field Office
50 Bastian Road
Battle Mountain, NV 89820
http://www.nv.blm.gov/battlemountain
(775) 635-4000 or bmfoweb@nv.blm.gov

TAKE PRIDE IN AMERICA

B. Seidlitz
3/21/08

MAR 21 2008

In Reply Refer To:
3809/1790 (NV063)
NVN-082096
NV063-EIS07-019

CERTIFIED MAIL: 7002 0510 0000 4044 4504 - RETURN RECEIPT REQUESTED

Wayne K. Dyer - Chair
Yomba Shoshone Tribe
HC 61 Box 6275
Austin, Nevada 89310

Dear Mr. Dyer:

This is an invitation to the Yomba Shoshone Tribe to participate as a concurring party to a Programmatic Agreement (PA) between the Bureau of Land Management (BLM) Battle Mountain Field Office (BMFO) and the Nevada State Historic Preservation Office (SHPO) regarding the treatment of historic properties during the implementation of the Mt. Hope Molybdenum Mine treatment activities. Specific project activities and an invitation to participate in formal government-to-government consultation were mailed certified to your tribal offices on February 6, 2007.

The BLM BMFO, has determined that the Mt. Hope Molybdenum Mine Project may have an effect upon properties eligible for inclusion in the National Register of Historic Places. Therefore, a PA between the BLM and SHPO must be developed, which may reduce or eliminate negative impacts to historic properties. The BLM, as part of its consultation responsibilities, is providing the Tribe the opportunity to be a concurring party for this PA between the BLM and SHPO.

Please review the enclosed draft PA and let the BLM know what role you wish to take in this portion of the project. Participating as a concurring party does not legally bind the Tribe to this PA. BLM seeks your involvement in this agreement, which will provide for more efficient and effective cultural resource management between the BLM and SHPO.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in this BLM/SHPO process.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in this BLM/SHPO process.

Sincerely,

/s/ Stephen C. Drummond

Stephen C. Drummond
Assistant Field Manager
Non-Renewable Resources

Enclosure

cc: James Birchim

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Battle Mountain Field Office
50 Bastian Road
Battle Mountain, NV 89820
http://www.nv.blm.gov/battlemountain
(775) 635-4000 or bmfoweb@nv.blm.gov

TAKE PRIDE IN AMERICA

B. Seidlitz
3/21/08

MAR 21 2008

In Reply Refer To:
3809/1790 (NV063)
NVN-082096
NV063-EIS07-019

CERTIFIED MAIL: 7002 0510 0000 4044 4498 - RETURN RECEIPT REQUESTED

Davis Gonzales - Chair
Te-Moak Tribal Council
525 Sunset Street
Elko, NV 89801

Dear Mr. Gonzales:

This is an invitation to the Te-Moak Tribe of Western Shoshone to participate as a concurring party to a Programmatic Agreement (PA) between the Bureau of Land Management (BLM) Battle Mountain Field Office (BMFO) and the Nevada State Historic Preservation Office (SHPO) regarding the treatment of historic properties during the implementation of the Mt. Hope Molybdenum Mine treatment activities. Specific project activities and an invitation to participate in formal government-to-government consultation were mailed certified to your tribal offices on February 6, 2007.

The BLM BMFO, has determined that the Mt. Hope Molybdenum Mine Project may have an effect upon properties eligible for inclusion in the National Register of Historic Places. Therefore, a PA between the BLM and SHPO must be developed, which may reduce or eliminate negative impacts to historic properties. The BLM, as part of its consultation responsibilities, is providing the Tribe the opportunity to be a concurring party for this PA between the BLM and SHPO.

Please review the enclosed draft PA and let the BLM know what role you wish to take in this portion of the project. Participating as a concurring party does not legally bind the Tribe to this PA. BLM seeks your involvement in this agreement, which will provide for more efficient and effective cultural resource management between the BLM and SHPO.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in this BLM/SHPO process.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in this BLM/SHPO process.

Sincerely,

/s/ Stephen C. Drummond

Stephen C. Drummond
Assistant Field Manager
Non-Renewable Resources

Enclosure

cc: Pat Stevens

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Battle Mountain Field Office
50 Bastian Road
Battle Mountain, NV 89820
http://www.nv.blm.gov/battlemountain
(775) 635-4000 or bmfoweb@nv.blm.gov

TAKE PRIDE IN AMERICA

D Smith
3/21/08

MAR 21 2008

In Reply Refer To:
3809/1790 (NV063)
NVN-082096
NV063-EIS07-019

CERTIFIED MAIL: 7002 0510 0000 4044 4481 - RETURN RECEIPT REQUESTED

Dianna Buckner – Chair
Ely Shoshone Tribe
16 Shoshone Circle
Ely, Nevada 89301

Dear Ms. Buckner:

This is an invitation to the Ely Shoshone Tribe to participate as a concurring party to a Programmatic Agreement (PA) between the Bureau of Land Management (BLM) Battle Mountain Field Office (BMFO) and the Nevada State Historic Preservation Office (SHPO) regarding the treatment of historic properties during the implementation of the Mt. Hope Molybdenum Mine treatment activities. Specific project activities and an invitation to participate in formal government-to-government consultation were mailed certified to your tribal offices on February 6, 2007.

The BLM BMFO, has determined that the Mt. Hope Molybdenum Mine Project may have an effect upon properties eligible for inclusion in the National Register of Historic Places. Therefore, a PA between the BLM and SHPO must be developed, which may reduce or eliminate negative impacts to historic properties. The BLM, as part of its consultation responsibilities, is providing the Tribe the opportunity to be a concurring party for this PA between the BLM and SHPO.

Please review the enclosed draft PA and let The BLM know what role you wish to take in this portion of the project. Participating as a concurring party does not legally bind the Tribe to this PA. BLM seeks your involvement in this agreement, which will provide for more efficient and effective cultural resource management between the BLM and SHPO.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in this BLM/SHPO process.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in this BLM/SHPO process.

Sincerely,

/s/ Stephen C. Drummond

Stephen C. Drummond
Assistant Field Manager
Non-Renewable Resources

Enclosure

cc: Cindy Marques

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Battle Mountain Field Office
50 Bastian Road
Battle Mountain, NV 89820
http://www.nv.blm.gov/battlemountain
(775) 635-4000 or bmfoweb@nv.blm.gov

TAKE PRIDE IN AMERICA

B. Seidlitz
3/21/08

MAR 21 2008

In Reply Refer To:
3809/1790 (NV063)
NVN-082096
NV063-EIS07-019

CERTIFIED MAIL: 7002 0510 0000 4044 4511 - RETURN RECEIPT REQUESTED

Jerry Millet – Chair
Duckwater Shoshone Tribe
P.O. Box 140068
Duckwater, Nevada 89314

Dear Mr. Millet:

This is an invitation to the Duckwater Shoshone Tribe to participate as a concurring party to a Programmatic Agreement (PA) between the Bureau of Land Management (BLM) Battle Mountain Field Office (BMFO) and the Nevada State Historic Preservation Office (SHPO) regarding the treatment of historic properties during the implementation of the Mt. Hope Molybdenum Mine treatment activities. Specific project activities and an invitation to participate in formal government-to-government consultation were mailed certified to your tribal offices on February 6, 2007.

The BLM BMFO, has determined that the Mt. Hope Molybdenum Mine Project may have an effect upon properties eligible for inclusion in the National Register of Historic Places. Therefore, a PA between the BLM and SHPO must be developed, which may reduce or eliminate negative impacts to historic properties. The BLM, as part of its consultation responsibilities, is providing the Tribe the opportunity to be a concurring party for this PA between the BLM and SHPO.

Please review the enclosed draft PA and let the BLM know what role you wish to take in this portion of the project. Participating as a concurring party does not legally bind the Tribe to this PA. BLM seeks your involvement in this PA, which will provide for more efficient and effective cultural resource management between the BLM and SHPO.

On September 27, 2007, Gerald Dixon, of my staff, conducted a field tour with the Duckwater Council to the Mt. Hope Molybdenum Mine project area.

On February 12, 2008, Gerald Dixon met with Maurice Churchill and Annette George to work on combining a draft Duckwater and BLM Information Sharing Agreement. Also at this time, Gerald presented a copy of the attached Mt. Hope Molybdenum Mine PA. As indicated at the February 12, 2008, meeting, the Tribe may wish to utilize the upcoming combined BLM/Duckwater Mt. Hope Information Sharing Agreement or Memorandum of Understanding (MOU) rather than sign this PA, as a concurring party.

Please contact Gerald Dixon at 775-753-0383 or 775-635-4161, within 30 days upon your receipt of this letter, if you wish to participate in the BLM/SHPO process. You should also soon be receiving a draft BLM/Duckwater Tribe combined Information Sharing Agreement, which may serve a similar purpose as that of this PA.

Sincerely,

/s/ Stephen C. Drummond

Stephen C. Drummond
Assistant Field Manager
Non-Renewable Resources

Enclosure

cc: Annette George
Maurice Churchill

\\ilmnvbm3ds1\bm\users\cramos\Desktop\BMFO - Mt.HopePAtribalLetter - Dckwtr - 3-18-08.doc

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Battle Mountain Field Office
50 Bastian Road
Battle Mountain, Nevada 89820
http://www.nv.blm.gov/battlemountain
(775) 635-4000 or bmfoweb@nv.blm.gov

TAKE PRIDE IN AMERICA

OCT 17 2007

In Reply Refer To:
3809/1790 (NV063)
NVN-082096
NV063-EIS07-019

CERTIFIED MAIL: 7006 2150 0000 0369 8533
Return Receipt Requested

Ruby Sam – Chair
Duckwater Shoshone Tribe
P.O. Box 140068
Duckwater, Nevada 89314

Dear Ms. Sam,

On September 27, 2007, Gerald Dixon, of my staff, conducted a field tour with you and your Council to the Mt. Hope Molybdenum Mine Environmental Impact Statement (EIS) project area. As it was explained to me, Duckwater Shoshone Tribe will respond formally to the proposed project and will work with Gerald Dixon to create a final Cumulative Effects Study Area (CESA) for Native American Resources or Concerns. However, Duckwater Shoshone Tribe first wishes to review the cultural resources inventory report.

In order to fulfill your request, BLM Battle Mountain Field Office (BMFO) would first like to enter into an information sharing agreement or Memorandum of Understanding (MOU). This MOU is meant to foster communication, cooperation, and coordination between BMFO and the Duckwater Tribe in planning, identification, evaluation, protection, and interpretation to ensure that historic/prehistoric properties and traditional uses within the Mt. Hope Molybdenum Mine EIS project boundary are dealt with in an appropriate manner.

It is the federal agency's responsibility to collect information on cultural resources as defined in Manual 8100 CRM and maintain that information in a secure environment. This information is used to evaluate the significance of these resources and to develop appropriate protection measures. However, by law and tradition the Duckwater Shoshone Tribe also has a significant interest in the proper management and preservation of cultural resources. Please see the attached MOU, which applies to this particular land management project (Mt. Hope Molybdenum Mine).

If you find the terms of agreement and language applicable and appropriate, please feel free to sign and mail the document back to me at the address given above. Once we receive the MOU, signed by you, BLM BMFO can release the cultural resources survey report. If you have any questions or would like to make any changes to the MOU, please call Gerald Dixon at 775-753-0383. I look forward to establishing a proactive and productive working relationship with you and your Council.

Sincerely,

/s/ Stephen C. Drummond

Stephen C. Drummond
Acting Assistant Field Manager
Nonrenewable Resources

cc: Annette George
Duckwater Shoshone Tribe
P.O. Box 140068
Duckwater, NV 89314

SDRUMMOND:cc:10/17/2007:\\Blm\dfs\nv\bm\pub\nonrenewable\minerals\letters\LETTERS FINALIZED\MOUNTHOPE\MOUNTHOPEPLANOFOPERATIONS\MOU_RubySamLetter_October2007.doc

APPENDIX G

BLM SENSITIVE SPECIES LIST FOR THE BATTLE MOUNTAIN DISTRICT OFFICE

BLM Sensitive Species List for the Battle Mountain District as Identified in IM NV-2011-059

Scientific Scientific Name	Common Common Name	FWS FWS Status	NV NV Status	Global Global Status	State State Status	NV NV Range	Districts Districts Contain	BLM BLM Criteria	New BLM New to 2011 BLM List
Amphibians									
Bufo nelsoni	Amagosa Toad			G1G2	S1S2	YR	B	1,2	N
Rana luteiventris	Columbia spotted frog (including Toiyabe spotted frog subpopulation)	candidate		G4T2T3Q	S2S3	YR	B	1,2	Y
Birds									
Accipiter gentilis	northern goshawk		SS	G5	S2	Breeding	B	1	N
Buteo swainsoni	Swainson's hawk			G5	S2B	all	B	1	N
Centrocercus urophasianus	Greater Sage-grouse	CS	game bird	G4	S3S4	YR	B	1	N
Charadrius alexandrinus nivosus	Western snowy plover	T		G4T3	S3b	Breeding	B	1,2	N
Leucosticte atrata	Black Rosy-finch			G4	S3	YR	B	2	N
Melanerpes lewis	Lewis woodpecker			G4	S3	YR	B	1	N
Oreoscoptes montanus	Sage Thrasher		SS	G5	S5B	S	B	1	N
Fish									
Crenichthys nevadae	Railroad Valley Springfish	T	SE	G2	S2	YR	B	1	Y
Gila bicolor ssp. 5	Hot Creek Valley tui chub		SS	G4T1Q	S1	YR	B	2	Y
Gila bicolor ssp. 7	Railroad Valley tui chub		SS	G4T1Q	S1	YR	B	2	N
Gila bicolor ssp. 4	Fish Lake Valley tui chub		SS	G4T1Q	S1	YR	B	1,2	N
Rhinichthys osculus spp 5	Monitor Valley speckled dace		SS	G5T1	S1	YR	B	2	N
Mammals									
Euderma maculatum	spotted bat		ST	G5	S2	YR	B	1,2	N
Lasiurus blossevillii	western red bat		SS	G5	S1	YR	B	2	N
Myotis californicus	California myotis			G5	S4	YR	B	2	N
Myotis lucifugus	little brown myotis			G5	S?	YR	B	2	N
Brachylagus idahoensis	pygmy rabbit	petitioned	game	G4	S3	YR	B	1	Y
Microdipodops pallidus	pale kangaroo mouse		SP	G3	S2	YR	B	1	Y
Thomomys bottae abstrusus	Fish Spring pocket gopher			not current		YR	B	2	N
Thomomys bottae curatus	San Antonio pocket gopher			not current		YR	B	2	N
Ochotona princeps	pika		SP	G5	S2	YR	B	1,2	Y
Reptiles									
none									
Insects									
Aegialia crescenta	Crescent Dunes aegialian scarab	petitioned 2010		G1	S1	YR	B	1,2	N
Aegialia knighti	aegialian scarab beetle	petitioned 2010		G1	S1	YR	B	1,2	N
Aphodius sp. 2	Crescent Dunes aphodius scarab	petitioned 2010		G1Q	S1	YR	B	1,2	N
Cercyonis oetus alkalorum	Big Smoky wood nymph			G5T1	S1	YR	B	2	N
Cercyonis pegala pluvialis	White River wood nymph			G5T2	S2	YR	B	2	N
Hesperia miriamae longaevicola	White Mountains skipper			G2G3T1T2	S1	YR	B	2	N
Hesperia uncas fulvapalla	Railroad Valley skipper	petitioned 2010		G5T1	S1	YR	B	1,2	N
Hesperia uncas grandiosa	White River Valley skipper	petitioned 2010		G5T1	S1	YR	B	1,2	N
Philotiella speciosa septentrionalis	Great Basin small blue			G3G4T1	S1	YR	B	2	N
Serica ammomenisco	Crescent Dunes serican scarab	petitioned 2010		G1	S1	YR	B	1,2	N
Serica psammobunus	Sand Mountain serican scarab	petitioned 2010		G1	S1	YR	B	1,2	N

BLM Sensitive Species List for the Battle Mountain District as Identified in IM NV-2011-059

Scientific Scientific Name	Common Common Name	FWS FWS Status	NV NV Status	Global Global Status	State State Status	NV NV Range	Districts Districts Contain	BLM BLM Criteria	New BLM New to 2011 BLM List
Molluscs									
Pyrgulopsis anatina	Southern duckwater pryg	petitioned 2009		G1	S1	YR	B	2	N
Pyrgulopsis basiglans	large-gland Carico pyrg			G1	S1	YR	B	2	N
Pyrgulopsis carinata	carinate Duckwater pyrg			G1	S1	YR	B	2	N
Pyrgulopsis dixensis	Dixie Valley pyrg			G1	S1	YR	B	2	N
Pyrgulopsis micrococcus	Oasis Valley pyrg			G1	S1	YR	B	2	N
Pyrgulopsis wongi	Wongs pyrg			G1	S1	YR	B	1,2	N
Plants									
Asclepias eastwoodiana	Eastwood milkweed	Species of Concern		G2Q	S2	Y	B	2	N
Astragalus cimae var. *cimae*	Cima milkvetch			G2	S2	Y	B	1	Y
Astragalus pseudiodanthus	Tonopah milkvetch			G2Q	S2	Y	B	1, 2	Y
Astragalus toquimanus	Toquima milkvetch			G2	S2	Y	B	1	N
Astragalus uncialis	Currant milkvetch	Species of Concern		G2	S1	Y	B	1	N
Boechera falcifructa	Elko rockcress	Species of Concern		G1G2	S1S2	Y	B	1,2	Y
Castilleja salsuginosa	Monte Neva paintbrush		CE	G1Q	S1	Y	B	1, 2	Y
Cordylanthus tecopensis	Tecopa birdbeak	Species of Concern		G2	S2	Y	B	1, 2	N
Cymopterus goodrichii	Goodrich biscuitroot	Species of Concern		G1	S1	Y	B	1	N
Epilobium nevadense	Nevada willowherb	Species of Concern		G2	S2	Y	B	1	N
Eriogonum anemophilum	Windloving buckwheat	Species of Concern		G2G3	S2S3	Y	B	1	N
Eriogonum beatleyae	Beatley buckwheat			G2Q	S2	Y	B	1	Y
Eriogonum tiehmii	Tiehm buckwheat	Species of Concern		G1	S1	Y	B	1, 2	N
Grusonia pulchella	Sand cholla			G4	S2S3	Y	B	2	Y
Johanneshowellia crateriorum	Lunar Crater buckwheat			G1	S1	Y	B	2	Y
Lupinus holmgrenianus	Holmgren lupine			G2G3	S2	Y	B	2	N
Parthenium ligulatum	Low feverfew			G3	S1	Y	B	1	N
Penstemon pahutensis	Pahute Mesa beardtongue	Species of Concern		G3	S3	Y	B	1	N
Penstemon palmeri var. *macranthus*	Lahontan beardtongue			G4G5T2?	S2?	Y	B	1	N
Penstemon pudicus	Bashful beardtongue	Species of Concern		G1	S1	Y	B	1	N
Penstemon tiehmii	Tiehm beardtongue			G1	S1	Y	B	1	N
Phacelia filiae	Clarke phacelia			G2	S2	Y	B	1	N
Polyctenium williamsiae	Williams combleaf	Former candidate	CE	G2Q	S2	Y	B	1,2	Y
Sclerocactus blainei	Blaine pincushion	Species of Concern	CY	G1G2Q	S1	Y	B	1	N
Sclerocactus nyensis	Tonopah pincushion		CY	G1Q	S1	Y	B	1	N
Sphaeralcea caespitosa var. williamsiae	Railroad Valley globemallow			G2T2	S2	Y	B	1	N
Tonestus graniticus	Lone Mountain goldenhead	Species of Concern		G1	S1	Y	B	1, 2	N

APPENDIX H:

DRAFT EIS PUBLIC COMMENTS AND RESPONSES

Appendix H

Public comments and responses to public comments are included in this appendix. Section 5.3.2 of the EIS includes a list of each of the commenters by name with their corresponding letter number. Section 1.0 of this appendix includes a list of all public comments received, as well as responses to all individual comments. Where the response to a public comment has been grouped with other similar comments, a grouped response is referenced. Grouped responses are identified as a common concern (CC) followed by a number and a brief description (i.e., CC-001-General Support). The content of the only form letter is included after the first form letter (Letter 248), the remaining form letters are identified as F1 in parentheses following the letter number.

Section 2.0 of this appendix includes a list of all grouped responses. Each grouped response lists the comments that were included in the group. A CD is attached to the back of Volume III of the FEIS that includes all public letters, emails, and oral comments numbered. The CD also contains individual substantive or actionable comments that were identified in each letter, email, and oral comment with brackets in the text and numbers in the margin.

1.0 Public Comments, Responses to All Individual Comments

Letter 1

Comment 1

BLM,
We are pleased that the Mt. Hope Project DEIS was published on Dec. 2nd. We are now writing in strong support of this project. We believe that the merits of the proposed mining will greatly help the economies and the communities of the area, and that the careful planning of General Moly will minimize the environmental impact of the mining.
Andrea and Doug Corley
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 2

Comment 1

BLM IS A CESSPOOL AGENCY. THEY SPECIALIZE IN TURNING FINE ENVIRONMENTAL SITES INTO DIGUSTING PILES OF TOXIC WASTE. THIS PERMIT NEEDS TO BE DENIED. THE CORRUPT POLITICIANS IN WASHINGTON AND NEVADA OF COURSE WANT THIS DESTRUCTIVE PROJECT THAT KILLS ALL LIFE IN THE AREA. I OPPOSE GRANTING ANY PERMIT TO THIS DESTRUCTIVE FIRM TO OPERATE IN THIS AREA. THE WILD HORSES, BIRDS, CLEAN WATER ALL NEED TO BE PRESERVED. WE DONT NEED THIS DESTRUCTIVE FIRM TO OPERATE IN THIS SITE. AMERICAN PEOPLE OWN THIS SITE. RESPECT THEM AND THEIR OBLIGATION TO PROTECT LAND FOR HTEIR KIDS AND GRANDKIDS. STOP DESTROYING ALL OF EARTH SO THAT NO LIFE CAN EXIST ON EARTH ANYMORE. THIS IS A BEAUTIFUL SITE WHICH SHOUDL BE PRESERVED. USACITIZEN1@LIVE.COM
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 3

Comment 1

I am very supportive of this project and others like it that have us securing and producing resources here in america.....plus you have added benefit ofcreating great jobs in a state that needs them.....it would be great if gmo management together with local,state and federal officials led from the front in getting america back to where we should be ...strong ,proud and and building a future for our children,it all" starts local".
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 4

Comment 1

I believe that both volumes of the Mt. Hope DEIS were well-prepared and that all models show the environmental impacts to be negligible. Hopefully the farmers in Eureka County that are tapping the basin dry will stop extorting General Moly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 5

Comment 1

I support the Mt Hope Project. It will create jobs, which are desperately needed, in the near and long term, .
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 6

Comment 1

I am writing in support of the Mt. Hope project. As an employee of this company over the past five years, I have a most sincere appreciation for the time, effort and expense that has gone into the preparation of the Mt. Hope Draft Environmental Impact Statement (DEIS) and believe the environmental and social analysis contained within this document to be extremely robust.
I believe the BLM has thoroughly evaluated the Mt. Hope project's potential impact to the environment, especially the regional groundwater of Eureka County, and that farmers, animals and water resources within close proximity to Mt. Hope are adequately protected by mitigation plans developed by the BLM and the Company.
Beyond my interest as an employee, I support the Mt. Hope project as a responsible use of our Federal lands. I support the responsible mining of natural resources, the creation of over 400 full-time and high-paying mining jobs, and the creation of hundreds of millions of dollars in taxes, which will greatly benefit both the community of Eureka and the State of Nevada.
Throughout this five year process, the County of Eureka has attempted to slow the Mt. Hope project's development many times, and I suspect that they will produce voluminous comments to the DEIS, trying once again to stall the project in the name of requesting additional analysis. I strongly urge the BLM to move forward with the Final EIS as expeditiously as possible and not to revisit analysis and comments submitted by the County and its attorneys in prior review and comment periods, which I believe the BLM has adequately dealt with.
Let's move forward with the Mt. Hope project! General Moly is: Mining Done Right.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 7

Comment 1

As a citizen of the United States, a tax payer and someone very concerned about our natural resources and American icons and treasures such as America's wild horses and burros, The Mount Hope Mine Project is NOT something I want to have happen in Nevada just at the tip of the Aguilar Aquifer (the world's largest aquifer stretching down to Texas). Further, it's my understanding that this project is to be heavily invested in by the Chinese to extract molybdenum using water at rates of 25,000 gallons per minute! The Chinese want the molybdenum, for high technology uses and Nevada has the richest deposits in the world, thus this mine will be the world's biggest! This is unacceptable! The Chinese have a proven and horrible record for pollution and wasteland left by their explorations on American soil. This will be detrimental to the State of Nevada and America's wild horse and burro populations that I, personally, treasure and hold dear. Please make a record of my COMPLETE OPPOSITION to this project! Thank you!
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 8

Comment 1

I support the Mt. Hope project being permitted and allowed to move forward into operation. The Draft EIS appears complete, and I have reviewed the project in detail with a representative of the parent company, General Moly. I am convinced that the project will be developed and operated in an environmentally and socially responsible manner. Our country needs investment which will result in job creation and economic benefit, and the Mt. Hope project accomplishes both.
Please do all you can to enable the company to move the project forward as expeditiously as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 9

Comment 1

I am writing to express my support for the Mt. Hope Project being permitted and allowed to move forward into operation.

My firm, Cutfield Freeman & Co Ltd. based in London, has been working with General Moly Inc. for the past two years to raise the necessary development finance. During that process we have reviewed the project thoroughly, and so have many other third parties – including mining companies, financiers, and various technical consultants. The overwhelming reaction is a well conceived project, and is being progressed in to the highest standards of social and environmental responsibility. The economic and job creation benefits to the communities in the region will be enormous.
I would urge you to do all you can to move this project forward in the most timely manner.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 10

Comment 1

I want to provide my support for approving General Moly's Mt. Hope EIS. The draft EIS appears thorough and well thought out and provides a basis for developing and operating the project in an environmentally and socially responsible manner. We need to support projects such as Mt. Hope, which will create jobs and other economic benefits for the US.

Please give your best effort to approve the EIS and allow the project to move forward with a minimum of delay.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 11

Comment 1

I support the Mt. Hope project being permitted and allowed to move forward into operation. The Draft EIS appears complete, and I have reviewed the project in detail with a representative of the parent company, General Moly. I am convinced that the project will be developed and operated in an environmentally and socially responsible manner. Our country needs investment which will result in job creation and economic benefit, and the Mt. Hope project accomplishes both.

Please do all you can to enable the company to move the project forward as expeditiously as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 12

Comment 1

I am in support of the Mt. Hope project being permitted and allowed to move forward into operation to help bring employment to Nevada as well as increase our tax base. The Draft on the EIS appears complete and General Moly environmentally responsible and socially responsible company/developer. Our country and especially Nevada needs investments to help restore our economy, and the Mt. Hope project would help to accomplish this task.

Please do all you can to enable this project to move forward as expeditiously as possible.

I am available at any time should you need additional support.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 13

Comment 1

I am in support of the Mt. Hope project being permitted and allowed to move forward into operation to help bring employment to Nevada as well as increase our tax base. The Draft on the EIS appears complete and General Moly environmentally responsible and socially responsible company/developer. Our country and especially Nevada needs investments to help restore our economy, and the Mt. Hope project would help to accomplish this task.

Please do all you can to enable this project to move forward as expeditiously as possible.

I am available at any time should you need additional support.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 14

Comment 1

I am in support of the Mt. Hope project being permitted and allowed to move forward into operation to help bring employment to Nevada as well as increase our tax base. Our country and especially Nevada needs investments to help restore our economy, and the Mt. Hope project would help to accomplish this task. In addition mining today is very environmentally friendly and I am confident that General Moly would meet and exceed requirements.

Please do all you can to enable this project to move forward as expeditiously as possible.

I am available at any time should you need additional support.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 15

Comment 1

I am in support of the Mt. Hope project being permitted and allowed to move forward into operation to help bring employment to Nevada as well as increase our tax base. The Draft on the EIS appears complete and General Moly environmentally responsible and socially responsible company/developer. Our country and especially Nevada needs investments to help restore our economy, and the Mt. Hope project would help to accomplish this task.

Please do all you can to enable this project to move forward as expeditiously as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 16

Comment 1

I am writing in effort to show my support of the Mt. Hope project ...

It goes without saying that the State of Nevada is in dire need of projects as such, both from a perspective of tax revenue, employment, and the like ... the draft on the EIS appears complete, and the company/developer environmentally & socially responsible ...

Our country, and particularly Nevada, desperately need capital investments like this project to help revitalize our economy ... the Mt. Hope project would help greatly to that end ...

You have my full support to help see this project become a reality ... feel free to contact me anytime ...

Thank you for your efforts ...
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 17

Comment 1

I am writing to you to express my support in approving this project for the state of Nevada. I am connected to Mining through the products my company produces and this project would prove extremely beneficial to our core business. This project would also prove worthy for job creation and boost our local economy in the state of Nevada.

Thank you for your time and consideration of this project.

The Mt. Hope project is one of the world's largest and highest grade undeveloped molybdenum projects. The project is owned 80% by General Moly and 20% by POSCO through a joint venture.

The Mt. Hope deposit contains 1.3 billion pounds of Proven and Probable reserves. General Moly completed a Bankable Feasibility Study on Mt. Hope in August of 2007.

After announcing a significant financing transaction in March 2010, General Moly is focusing on completing the permitting process, reinitiating engineering and equipment procurement efforts, and completing the Hanlong financing. On a 100% basis, Mt. Hope will produce approximately 40 million pounds annually over its first five years of operations and has a 44 year mine life. High grades in the early years of production are expected to make Mt. Hope one of the lowest cost producers.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 18

Comment 1

Let the Mt. Hope project be done with all the government red tape that is keeping hundreds of Nevada Construction workers and miners from feeding their families.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 19

Comment 1

I am in support of the Mt. Hope project being permitted and allowed to move forward into operation to help bring employment to Nevada.

Please do all you can to enable this project to move forward as expeditiously as possible.

I am available at any time should you need additional support.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 20

Comment 1

I am writing in support of the Mt. Hope project. I would like to ask that the BLM approve permitting allowed General Moly to move forward into operation. Projects of this scope will bring employment to Nevada as well as increase our tax base, two things that every Nevadan knows we need during this economically bleak time. The Draft on the EIS appears complete and General Moly is environmentally responsible and socially responsible company/developer. Our country and especially Nevada needs investments to help restore our economy, and the Mt. Hope project would help to accomplish this.

I ask you to please approve permitting and allow the Mt. Hope project to move forward to help create a better future for our fellow Nevadans.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 21

Comment 1

I support the Mt. Hope project being permitted and allowed to move forward into operation. The Draft EIS appears complete, and I have reviewed the project in detail with a representative of the parent company, General Moly. I am convinced that the project will be developed and operated in an environmentally and socially responsible manner. Our country needs investment which will result in job creation and economic benefit, and the Mount Hope project accomplishes both.

Please do all you can to enable the company to move the project forward as quickly as possible.
Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 22

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include:
* No endangered species at the site
* Only a little pit dewatering is required
* No wetlands
* No sacred sites

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Furthermore, even if it did work economically (which is highly doubtful), as you point out "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

Thank you for letting me submit this letter in support of the project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 23

Comment 1

I would like to contribute to the public commentary on the Mount Hope mine proposal and voice my support for the preferred alternative. Please support this proposal and help get this project moving.

Wild horses are overpopulating the range and destroying the values of a balanced ecosystem. The wild horse mitigation for the Mt Hope project will help BLM be better able to balance the population. This project is socio-economically beneficial on many levels.

The growing worldwide steel industry needs a reliable source of molybdenum. I appreciate the planning that General Moly has exhibited in its proposal for the Mt Hope mine and wish to thank the BLM for its consideration in moving this project forward.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 24

Comment 1

I would like to provide comments about my full support of General Moly's Mount Hope Project Draft EIS.

I have worked in the mining industry for over 23 years, most of that time while living in Northeastern Nevada, and grew up in Elko, NV. I am well aware of the communities of Elko and Eureka and the counties in which they are located. The Mount Hope Project represents a well-planned, environmentally sound, exciting opportunity for this region. The local communities will benefit from over 40 years of solid employment in well-paying jobs, steady property tax benefits from the billion dollar property investment being made in Eureka County, and on-going Net Proceeds of Minerals Tax proceeds to the state of Nevada and Eureka County. Sales taxes will increase in Elko and Eureka Counties as well when the mining equipment and supplies are purchased. These benefits extend to the associated industries and suppliers; and the community as well.

Another important point about General Moly is that the company has assembled a team of the most qualified and seasoned experts in the mining industry to lead the project. All members of management are well-known for their expertise in environmental stewardship, mining and processing efficiency, and fiduciary responsibility. This will be a state-of-the-art project and a model for future mining operations of this kind.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 25

Comment 1

I appreciate the BLM offering this opportunity to comment on General Moly's DEIS. The mine at Mt Hope will bring many good paying jobs to Nevada and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression.

I am concerned with the vitality and flow of streams and springs.
However, it looks like EMLLC has a very thorough and rigorous monitoring program. The information the mine collects will help us understand the hydrology in the area - including how the Diamond Valley over-pumping is affecting conditions. This will be helpful

to protecting and preserving the water, which is the most important resource. The Mount Hope project should be approved because of this beneficial impact.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 26

Comment 1

Please accept my comments on the proposed alternative for General Moly's Mount Hope DEIS. I approve of this plan and would like to see its quick implementation.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 27

Comment 1

It is with great concern for the environment that I write to ask your support of the BLMs preferred alternative in General Moly's proposed Mount Hope mine project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how mines should be developed and I would like to see it move forward without delay.

With the increasing worldwide demand for aircraft and renewable energy projects, the American steel industry needs a reliable and abundant source of molybdenum. As you know, molybdenum is primarily used in the steel industry to strengthen carbon and stainless steels and to reduce corrosion. It makes steel capable of handling high stress and temperatures. General Moly's Mount Hope Project has the ability to produce the molybdenum necessary to keep this industry strong and able to supply the world's need for steel.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 28

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild

horses.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 29

Comment 1

The Draft Environmental Impact Statement and the Preferred Alternative for General Moly's proposed molybdenum mine should be approved and the mine should be allowed to move forward. It's good for central Nevada and her neighbors.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 30

Comment 1

The Preferred Alternative outlined in the BLMs Draft Environmental Impact Statement for the Mount Hope mine should receive support and approval. I support this plan and the many positive economic and environmental benefits it will reap.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

I can't think of one good reason why this mine shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 31

Comment 1

It's with great enthusiasm that I write today urging approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. We need the jobs this mine will provide.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on

Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 32

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine.

If Eureka Moly LLC has the rights to mine Mt Hope, through legal control of valid claims, they should be allowed to mine. The same goes for the water rights.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible. Thank you for considering my comments.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 33

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision. This draft has done exactly that, and therefore it's time to move ahead so more than 300 families can have the security of long-term, good-paying jobs.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 34

Comment 1

I support American jobs in the mining industry and ask that General Moly be approved in moving forward with the proposed action as outlined in the BLMs Draft Environmental Impact Statement.

With the increasing worldwide demand for aircraft and renewable energy projects, the American steel industry needs a reliable and abundant source of molybdenum. As you know, molybdenum is primarily used in the steel industry to strengthen carbon and stainless steels and to reduce corrosion. It makes steel capable of handling high stress and temperatures. General Moly's Mount Hope Project has the ability to produce the molybdenum necessary to keep this industry strong and able to supply the world's need for steel.

Now's the time to move in the mining industry. General Moly's DEIS is the way forward. Thanks to the BLM for presenting this project for approval.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 35

Comment 1
It's with great enthusiasm that I write today urging approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. We need the jobs this mine will provide.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now if a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 36

Comment 1
The Draft Environmental Impact Statement and the Preferred Alternative for General Moly's proposed molybdenum mine should be approved and the mine should be allowed to move forward. It's good for central Nevada and her neighbors.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

I applaud the BLM's work on this Draft EIS. It is a more-than thorough "hard look" at the impacts of the Mount Hope Project and reaches the right conclusion, that this project needs to move ahead. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 37

Comment 1
Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is

estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

By tapping into our abundant natural resources here at home, our economic outlook could be vastly improved. As an American company, run by American management and a majority of American shareholders, General Moly's Mount Hope project will contribute greatly to our economy.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

Thank you for accepting comments for this important project. The Mount Hope mine will do a great deal for the economic outlook of this country.
Let's get Americans back to work!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 38

Comment 1

I say let's get moving with the Mount Hope mine and implement your Preferred Alternative ASAP.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations. This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

It seems to me that General Moly has a firm commitment to protecting Nevada and the state's environment and historical sites. Some of the steps GM will take include: separate out rock that may generate acid when exposed to air and water; store needed topsoil to be used when the area is reclaimed; build the mine as a zero-discharge operation; design the operation in a way that does not disturb the famed Pony Express trail. Those are just some of the measures that demonstrate GM's intentions.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

The DEIS to evaluate General Moly's proposed Mount Hope mine is extremely thorough and demonstrates no significant impact to the environment. This project will create 400 good-paying jobs and will create additional revenue for the state of Nevada in the form of payroll taxes, mining net proceeds tax, and sales tax. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with this plan in a timely manner. It's the right thing to do.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 39

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.
There are many good reasons to support this mine and I hope it will be approved as soon as possible.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

This is an important mine that will provide a vital commodity, and one that should be allowed to proceed in as quick a manner as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 40

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include: no endangered species at the site; only a little pit de-watering is required; no wetlands; no sacred sites.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 41

Comment 1

The Preferred Alternative outlined in the BLMs Draft Environmental Impact Statement for the Mount Hope mine should receive support and approval. I support this plan and the many positive economic and environmental benefits it will reap.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

This is an important mine that will provide a vital commodity, and one that should be allowed to proceed in as quick a manner as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 42

Comment 1

I support development of General Moly's molybdenum mine in central Nevada and recommend that you approve the mine as the preferred alternative. This which will create long-term jobs and economic benefits for communities in central Nevada, as well as the entire state and nation.

The agency was correct in the alternatives in the "considered and eliminated from consideration" category, as well as in analyzing but dismissing the other alternatives. For example, while you must consider a No Action Alternative, it would be shameful to waste a valuable resource benefiting so many people. It was also wise to not select the Slower, Longer Project Alternative, which would be detrimental to project's economics.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

Thank you for allowing me to comment and please don't delay in approving permits for this mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 43

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

Water use proposed by the mine is well-thought out. They are planning to pump only what they need to produce the molybdenum, and they plan to recycle a lot of water back from the tailings pond to the mill circuit.
This is an environmentally sound approach and will make the project sustainable for generations to come.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 44

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around. General Moly should be allowed to proceed as

soon as possible on developing a mine that has proven viability and a long life ahead of it.

With the BLM as the lead agency, this Draft Environmental Impact Statement has covered all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 45

Comment 1

Allow me to submit my comments regarding General Moly's proposed mine at Mount Hope. I fully support this project and the Preferred Alternative as outlined in the DEIS.

Rural Nevada needs mining as well as ranching and recreation. I believe and support the multi-use concept for federal lands. As such I favor the Mt Hope project and hope that the permits will be issued in a timely manner and that the project can move from planning to mining.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 46

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

Water is certainly a concern, and the monitoring program will really ensure that any impacts from the Mount Hope Mine are well understood.
This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine didn't get built. Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

With the increasing worldwide demand for aircraft and renewable energy projects, the American steel industry needs a reliable and abundant source of molybdenum. As you know, molybdenum is primarily used in the steel industry to strengthen carbon and stainless steels and to reduce corrosion. It makes steel capable of handling high stress and temperatures. General Moly's Mount Hope Project has the ability to produce the molybdenum necessary to keep this industry strong and able to supply the world's need for steel.

Wild horses are overpopulating the range and destroying the values of a balanced ecosystem. The wild horse mitigation for the Mt Hope project will help BLM be better able to balance the population. This project is socio-economically beneficial on many levels.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 47

Comment 1

I wish to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

Our national economy depends on putting people back to work and getting less dependent on foriegn resources. It is time we get back

to making use of our abundant natural resources we have here in the United States.

The Draft EIS should be approved and the mine infrastructure developed to allow the mine to open as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 48

Comment 1

I support the proposed mine at Mount Hope. Please make the process for opening this proposed mine as low cost, efficient, and streamlined as possible. I understand that opening a mine is not easy and many regulatory hurdles must be overcome to help avoid unacceptable levels of damage and/or change to the natural environment, as well as cumbersome lawsuits against both the mining companies and the government. I believe modern mining methods are safe, environmentally responsible, and efficient, and if General Moly is proposing modern mining methods then the process for them to open the mine at Mount Hope should be made as easy and quick as possible to more quickly create much needed jobs. Thank you for you consideration.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 49

Comment 1

I strogly support General Moly and the Mount Hope Project and believe this project is environmentally sound and will help get Americans back to work.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 50

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine. This project has been well thought out and all conceivable issues have been addressed.

The mitigation includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that. Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

Now's the time to move in the mining industry. General Moly's DEIS is the way forward. Thanks to the BLM for presenting this project for approval.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 51

Comment 1

Allow me to voice my strong support for the proposed mine at Mount Hope.
As outlined in the DEIS, the BLM very thoroughly examined this proposal and the other alternatives and I wish to support the proposed action outlined in the DEIS.

The mitigation includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that.

Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible. Thank you for considering my comments.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 52

Comment 1

The preferred alternative as outlined in the Bureau of Land Management's DEIS for the Mt. Hope mine should be approved immediately. Any American operation that puts people back to work should be supported in these tough economic times.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

Now's the time to move in the mining industry. General Moly's DEIS is the way forward. Thanks to the BLM for presenting this project for approval.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 53

Comment 1

I'm a proponent of the proposed molybdenum mine, Mount Hope want to see it approved. General Moly's plan is environmentally-sound as outlined in their proposed action. It will make a significant contribution to the economy and create jobs in region and the country.

The Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. The sooner this project is approved, the sooner we can put more Americans to work.

I appreciate the opportunity to add my thoughts to the public comment period. The BLMs preferred alternative should be approved immediately.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 54

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

Water is certainly a concern, and the monitoring program will really ensure that any impacts from the Mount Hope Mine are well understood.
This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine didn't get built. Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 55

Comment 1

Americans urgently need jobs and General Moly is ready to provide them.
Please approve the preferred alternative as proposed in the Draft Environmental Impact Statement and help get Americans back to work.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

We hear a lot about the 'boom and bust' of mining, but the reality of the Mount Hope Project is that a miner could go to work on construction next year and have a job for 45 years, or even 50 years if he/she worked on post-closure reclamation. Many of us would love to have the opportunity to spend our entire career in one place. That's one more reason to open the mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 56

Comment 1

As an Nevadan, I would like to voice my support of General Moly's molybdenum mine in central Nevada. The preferred option promotes responsible mining and economic benefits. In these times, we as a nation cannot afford to waste opportunity. I am glad that the process of an EIS addresses environmental impacts and mitigation of those impacts. An EIS is not a simple process--long hours of evaluation and study are put into them. In this case, I believe the BLM has arrived at the best conclusion.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 57

Comment 1

I recommend you approve the Mount Hope mine, and that it be approved as soon as possible. The preferred alternative clearly outlines a plan that works for the benefit of mining and conservation in Nevada and that will extract a commodity that is in demand by the worldwide steel market.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

As an outdoor enthusiast I urge you to approve this project. I have seen great examples of other mining companies' commitments to be stewards of the environment. Reclamation at Mt Hope will meet standards and the Henderson Creek access road will stay open. This is a great way to meet outdoor objectives and allow this economically important project to proceed.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision. This draft has done exactly that, and therefore it's time to move ahead so more than 300 families can have the security of long-term, good-paying jobs.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 58

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

This mine will provide a needed and strategic commodity while having an acceptable environmental impact. Some of the environmental aspects that make this an excellent location and use of the land include: no endangered species at the site; only minor pit de-watering required; no wetlands; no sacred sites.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding rural community and to the economic future of Eureka County, the State of Nevada, and our nation as a whole. Please see that this project is allowed to proceed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 59

Comment 1

Approval of the Proposed Action as outlined in General Moly's DEIS will bring jobs and stability to Nevada. Mining projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

There are many good reasons to approve the proposed mine at Mount Hope.
Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on this mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 60

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

The study done to evaluate potential impacts from the project shows there won't be any significant impacts to Diamond Valley, which is the main competing use for water in the area. This is not just a claim by the mining company but is obviously a very expensive and technically robust scientific analysis. If this level of detail is representative of the studies done for this EIS, then without question the analysis is adequate.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 61

Comment 1
The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 62

Comment 1
As someone who treasures the natural beauty of the American west, I ask that the preferred alternative for the Mount Hope mine proposal be approved. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

General Moly is creating American jobs and boosting the economy of the State of Nevada at a time when many around the nation are suffering from lack of work. Not only will General Moly's Mount Hope Project improve the economic well-being of the area immediately surrounding it, but will also do a great deal to improve our economic well-being nationally. This mine will reduce the national trade deficit by around $600 million annually and generate $50 million per year in Federal, State, and local taxes.

The BLM has done a great job of evaluating General Moly's Mt Hope mine proposal. I am convinced that this project should be approved without further delay.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 63

Comment 1

Please move forward with Bureau of Land Management's Preferred Alternative as detailed in Chapter 2 of the Draft Environmental Impact Statement.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Furthermore, even if it did work economically (which is highly doubtful), as you point out "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

As an outdoor enthusiast I urge you to approve this project. I have seen great examples of other mining companies' commitments to be stewards of the environment. Reclamation at Mt Hope will meet standards and the Henderson Creek access road will stay open. This is a great way to meet outdoor objectives and allow this economically important project to proceed.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

This is an important mine that will provide a vital commodity, and one that should be allowed to proceed in as quick a manner as possible.

I have been a geologist in the field for over 30 years. During this time I have worked on many reclamation, EIS, industrial and military environmental sites. I believe the work on this project has been done to the highest level of current technology and will ensure the people of Nevada that the rules are being followed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 64

Comment 1

The Preferred Alternative outlined in the BLMs Draft Environmental Impact Statement for the Mount Hope mine should receive support and approval. I support this plan and the many positive economic and environmental benefits it will reap.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

It is important that the public have the ability to comment on projects of this nature as it affects many for years to come. Thank you for the opportunity to comment and please see that this worthy effort is allowed to be developed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 65

Comment 1

Please seriously consider the content below. I support responsible mining, the addition to the economy and the job opportunities this project will provide.

It is with great concern for the environment that I write to ask your support of the BLMs preferred alternative in General Moly's proposed Mount Hope mine project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how mines should be developed and I would like to see it move forward without delay.

It seems to me that General Moly has a firm commitment to protecting Nevada and the state's environment and historical sites. Some of the steps GM will take include: separate out rock that may generate acid when exposed to air and water; store needed topsoil to be used when the area is reclaimed; build the mine as a zero-discharge operation; design the operation in a way that does not disturb the famed Pony Express trail.
Those are just some of the measures that demonstrate GM's intentions.

There are many good reasons to approve the proposed mine at Mount Hope.
Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on this mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 66

Comment 1

The mining industry is one of the bright spots in an otherwise bleak economy. Please approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 67

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.

The mitigation includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that.

Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 68

Comment 1
I say let's get moving with the Mount Hope mine and implement your Preferred Alternative ASAP.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.
General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

General Moly's DEIS is thorough and deserves approval. We need to do everything we can to strengthen and grow the economy of Nevada and the west in general. This proposed mine will do just that. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 69

Comment 1
Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include: no endangered species at the site; only a little pit de-watering is required; no wetlands; no sacred sites.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

I can't think of one good reason why this mine shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 70

Comment 1

I am writing to let you know of my support of the BLMs preferred alternative in General Moly's proposed Mount Hope mine project and request you to support it as well.

Economic mineral deposits are only found in a tiny fraction of the earth's crust. Unfortunately we don't get to decide where these mineral deposits are located but we do get to select if an how these mineral deposits are mined. From my perspective General Moly's approach to the Mt. Hope project strikes a reasonable if not ideal balance between being a viable mine and caring for the environment.

The US needs to make sure that we are not reliant on other nations for the basic needs of our own country. This includes our ability to produce the high quality steel and stainless steel that consume molybdenum in the production process. The Mt. Hope mine will not only allow the US to meet domestic needs but it will also produce enough molybdenum for export as well.

I have taken the time to learn about the Mt. Hope project from many aspects and while all mines have an impact on the environment, so does all human activity. Everything from the homes be build to the clothes we wear and the vehicles we drive come with an environmental impact. I believe the convenience of these modern amenities are worth the environmental impact they caused especially when derived with the same environmental stewardship extolled by the Mt. Hope EIS. Everything has an impact, let's just be responsible with the impact.

I appreciate the opportunity to comment on the Mt. Hope EIS. I recommend you approve this in a timely fashion.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 71

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 72

Comment 1

Approval of the Proposed Action as outlined in General Moly's DEIS will bring jobs and stability to Nevada. Mining projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no

"impacts" to water quantity, because the mine will just be using water that they own.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.

General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

When faced with a poor economic outlook, one must look for ways to improve the situation. General Moly's proposed mine at Mount Hope offers just such a solution and deserves approval. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 73

Comment 1
I write today in support of General Moly s molybdenum mine. This is a project that is easy to support because it will benefit families both within and outside of its central Nevada location. The proposed alternative presents a path to employment for many let s makes it happen.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly s Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work.
It should be approved and allowed to open as soon as possible.

The Mt. Hope project is one of the world s largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

Thank you for reviewing my comments. This project is deserving of approval and should not be delayed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 74

Comment 1
Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include: no endangered species at the site; only a little pit de-watering is required; no wetlands; no sacred sites.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible. Thank you for considering my comments. I lived in Nevada for 14 years and know how important this is to the rural communities.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 75

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

Wild horses are overpopulating the range and destroying the values of a balanced ecosystem. The wild horse mitigation for the Mt Hope project will help BLM be better able to balance the population. This project is socio-economically beneficial on many levels.

There are many good reasons to approve the proposed mine at Mount Hope.
Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on this mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 76

Comment 1

The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement. As a former miner and employee of the Climax Molybdenum mine, I strongly support the opening of the General Moly Mine. A very dear friend owns a home in Eureka and the opening of the mine will open the benefits of Eureka County to more folks.

Today, with the extreme recession facing our nation, the mining industry offers a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

Climax Moly was supported by the Federal Governmnet in the 1950's with even an FBI trained employee in the Climax security staff. Fifty years later, the need for the molybdenum is just as great.

Approve the plan and let's get on with it!!!
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 77

Comment 1

As a range management specialist who has worked in the mining industry for 30-some years and been responsible for reclamation of numerous mines, I support approval of General Moly's proposed molybdenum mine as described in the DEIS.

The mitigation measures described in the DEIS are appropriately protective of environmental resources and I know that effective reclamation can be accomplished as planned. This country needs the moly that this mine will produce as well as the great jobs that are part and parcel of the modern mining industry. Please move forward with the FEIS and ROD in a timely manner.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 78

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

The United States has the natural resources that can help pull us out of our current economic depression. With abundant stores of molybdenum, General Moly's proposed Mount Hope mine is an example of such a resource that should be put to use in this cause.

General Moly's mine at Mount Hope will create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 79

Comment 1
The proposed molybdenum mine at Mount Hope should be approved. General Moly has a clear and environmentally-sound plan outlined in the proposed action to make this mine a reality and it will do much to contribute to the economy and vitality of the region and the country.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

Thank you for your consideration. I look forward to seeing this project come to fruition.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 80

Comment 1
As a former BLM'er and Nevada resident who has been in the mining industry for 35 years, I support the findings, thoroughness and completeness of the DEIS for Mt. Hope. It is time for this project to rapidly advance and bring great, safe jobs and family-scale wages to Nevada, a state that has suffered more than almost any other from the domestic economic disaster of the last three years.

I urge rapid, even immediate, approval for Mt. Hope by BLM. What better place for an economic recovery to start than in Nevada?

Having been involved with the BLM, Nuclear Regulatory Commission and Forest Service in permitting projects in six different Western states, I commend both the BLM and General Moly on the completeness and commitment to excellence this document shows. This DEIS should get immediate approval and this should be followed as quickly as possible by BLM's favorable record of decision.

All who worked on this project - whether federal, corporate or contract - deserve a compliment for this fine body of work.

Thanks for this opportunity to comment.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 81

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.
There are many good reasons to support this mine and I hope it will be approved as soon as possible.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible. Thank you for considering my comments.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 82

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

I was with the group that originally discoveraed and proved the orebody at Mt. Hope, and know that it can be mined completely in hormony with the environment. So I strongly support your approval of this project.

We must support Americans looking for work. This mine is one way to do that. Please approve the plan.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 83

Comment 1

Approval of the Proposed Action as outlined in General Moly's DEIS will bring jobs and stability to Nevada. Mining projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen.

The study done to evaluate potential impacts from the project shows there won't be any significant impacts to Diamond Valley, which is the main competing use for water in the area. This is not just a claim by the mining company but is obviously a very expensive and technically robust scientific analysis. If this level of detail is representative of the studies done for this EIS, then without question the analysis is adequate.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 84

Comment 1

I write today in support of General Moly's molybdenum mine. This is a project that is easy to support because it will benefit families both within and outside of its central Nevada location. The proposed alternative presents a path to employment for many-let's makes it happen.

Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.
General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

When faced with a poor economic outlook, one must look for ways to improve the situation. General Moly's proposed mine at Mount Hope offers just such a solution and deserves approval. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 85

Comment 1

There's no time like the present to approve the BLMs proposed alternative as it relates to the mine at Mount Hope. We need the economic boost this mine will provide and the steel industry needs American molybdenum.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

General Moly's DEIS is thorough and deserves approval. We need to do everything we can to strengthen and grow the economy of Nevada and the west in general. This proposed mine will do just that. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 86

Comment 1

It's with great enthusiasm that I write today urging approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. We need the jobs this mine will provide.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

The growing worldwide steel industry needs a reliable source of molybdenum. I appreciate the planning that General Moly has exhibited in its proposal for the Mt Hope mine and wish to thank the BLM for its consideration in moving this project forward.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 87

Comment 1

The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

Wild horses are overpopulating the range and destroying the values of a balanced ecosystem. The wild horse mitigation for the Mt Hope project will help BLM be better able to balance the population. This project is socio-economically beneficial on many levels.

Despite the nit-picking from naysayers, this EIS exhibits that a modern mine can be planned by a company and evaluated by an agency in ways that allow for production that provides necessary minerals while protecting the environment and enhancing the socio-economics of a region. Job well done!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 88

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

This property is located in a sage brush plateau region, and would do little to impair the environment, except for the immediate area be excavated. There is no rational reason that anyone would oppose it, unless their purpose is to undermine the U.S. economy.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 89

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 90

Comment 1

I'm writing in support of General Moly's molybdenum mine in central Nevada. I recommend you approve the mine and move forward with the preferred alternative, which will create jobs and economic benefit for a wide region.

The agency was correct in the alternatives in the "considered and eliminated from consideration" category, as well as in analyzing but dismissing the others. For example, while you must consider a No Action Alternative, it would be an incredible waste of a valuable resources and of an opportunity for economic benefit to many, many people. It was also wise to not select the Slower, Longer Project Alternative. While it may sound appealing, this approach would not lead to a longer mine life, but would more likely result in the project's economics not penciling out and become a de facto No Action Alternative.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

It is important that the public have the ability to comment on projects of this nature as it affects many for years to come. Thank you for the opportunity to comment and please see that this worthy effort is allowed to be developed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 91

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

The Mount Hope project is ready to go and should be approved immediately.

General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

General Moly's DEIS is thorough and deserves approval. We need to do everything we can to strengthen and grow the economy of Nevada and the west in general. This proposed mine will do just that. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 92

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

Thanks again to the BLM for allowing public comment on this important proposal. It should go forward as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 93

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include: no endangered species at the site; only a little pit de-watering is required; no wetlands; no sacred sites.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

It is important that the public have the ability to comment on projects of this nature as it affects many for years to come. Thank you for the opportunity to comment and please see that this worthy effort is allowed to be developed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 94

Comment 1

Allow me to voice my strong support for the proposed mine at Mount Hope.
As outlined in the DEIS, the BLM very thoroughly examined this proposal and the other alternatives and I wish to support the proposed action outlined in the DEIS.

Water is certainly a concern, and the monitoring program will really ensure that any impacts from the Mount Hope Mine are well understood.
This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine didn't get built. Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

General Moly's mine at Mount Hope will create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 95

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

We must support Americans looking for work. This mine is one way to do that. Please approve the plan.

It is time for americans to take back America and quit kowtowing to special interest groups whom are wrongfully delaying projects such as this one. Please use common sense and approve this plan without delay.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 96

Comment 1

Please move forward with Bureau of Land Management's Preferred Alternative as detailed in Chapter 2 of the Draft Environmental Impact Statement.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Furthermore, even if it did work economically (which is highly doubtful), as you point out "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is

estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery. Thank you for presenting it and I hope it is approved quickly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 97

Comment 1

Like the rest of the nation, Nevada is suffering economically. I wish to voice my support for the proposed mine at Mt Hope because I would like to see more projects like this be successful so that our economy can benefit.

General Moly is creating American jobs and boosting the economy of the State of Nevada at a time when many around the nation are suffering from lack of work. Not only will General Moly's Mount Hope Project improve the economic well-being of the area immediately surrounding it, but will also do a great deal to improve our economic well-being nationally. This mine will reduce the national trade deficit by around $600 million annually and generate $50 million per year in Federal, State, and local taxes.

Thanks again to the BLM for allowing public comment on this important proposal. It should go forward as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 98

Comment 1

I say let's get moving with the Mount Hope mine and implement your Preferred Alternative ASAP.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

Thank you for letting me submit this letter in support of the project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 99

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the

region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

With the BLM as the lead agency, this Draft Environmental Impact Statement has covered all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 100

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

The growing worldwide steel industry needs a reliable source of molybdenum. I appreciate the planning that General Moly has exhibited in its proposal for the Mt Hope mine and wish to thank the BLM for its consideration in moving this project forward.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 101

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 102

Comment 1

The preferred alternative as outlined in the Bureau of Land Management's DEIS for the Mt. Hope mine should be approved immediately. Any American operation that puts people back to work should be supported in these tough economic times.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

I am concerned with the vitality and flow of streams and springs.
However, it looks like EMLLC has a very thorough and rigorous monitoring program. The information the mine collects will help us understand the hydrology in the area - including how the Diamond Valley over-pumping is affecting conditions. This will be helpful to protecting and preserving the water, which is the most important resource. The Mount Hope project should be approved because of this beneficial impact.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

We hear a lot about the 'boom and bust' of mining, but the reality of the Mount Hope Project is that a miner could go to work on construction next year and have a job for 45 years, or even 50 years if he/she worked on post-closure reclamation. Many of us would love to have the opportunity to spend our entire career in one place. That's one more reason to open the mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 103

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 104

Comment 1

The preferred alternative as outlined in the Bureau of Land Management's DEIS for the Mt. Hope mine should be approved immediately. Any American operation that puts people back to work should be supported in these tough economic times.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.

This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 105

Comment 1

The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

As an outdoor enthusiast I urge you to approve this project. I have seen great examples of other mining companies' commitments to be stewards of the environment. Reclamation at Mt Hope will meet standards and the Henderson Creek access road will stay open. This is a great way to meet outdoor objectives and allow this economically important project to proceed.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision. This draft has done exactly that, and therefore it's time to move ahead so more than 300 families can have the security of long-term, good-paying jobs.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 106

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

I applaud the BLM's work on this Draft EIS. It is a more-than thorough "hard look" at the impacts of the Mount Hope Project and reaches the right conclusion, that this project needs to move ahead. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 107

Comment 1

I say let's get moving with the Mount Hope mine and implement your Preferred Alternative ASAP.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

I am concerned with the vitality and flow of streams and springs.
However, it looks like EMLLC has a very thorough and rigorous monitoring program. The information the mine collects will help us understand the hydrology in the area - including how the Diamond Valley over-pumping is affecting conditions. This will be helpful to protecting and preserving the water, which is the most important resource. The Mount Hope project should be approved because of this beneficial impact.

As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision. This draft has done exactly that, and therefore it's time to move ahead so more than 300 families can have the security of long-term, good-paying jobs.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 108

Comment 1

I say let's get moving with the Mount Hope mine and implement your Preferred Alternative ASAP.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 109

Comment 1

Thank you for the opportunity to review the Mount Hope Project Environmental Impact Statement (EIS). Please accept this email comment in support of the proposed project.

As a long time resident in Northern Nevada, I recognize the benefits mining has brought to the State. The Mount Hope Project will create a long-term and stable mining operation in Nevada, having a proposed mining duration of 44 years. The project will bring significant short-term and long-term economic benefits to both the local community and the State of Nevada. The project will create

much-needed high-paying jobs. Implementation of the project will also have world-wide benefits. Operation of the Mount Hope Mine will provide a long-term supply of molybdenum to meet the global demand and will support the world-wide steel market.

Eureka Moly, LLC, has proposed a project that is also environmentally-sound. The proponent has built into the project's design numerous environmental protection measures proven to reduce or eliminate impacts to the environment. In addition, through the EIS process, the project site and vicinity have been studied and additional environmental mitigation measures have been recommended, further protecting the environment.

Implementation of the proposed project will provide long-term economic benefits to the local community and State of Nevada, will provide the world with a proven resource of molybdenum, while concurrently implementing measures to protect the environment.

I am in favor of the project and support the preferred alternative.

Please add my name to the project's mailing list to receive future notices. I would also like to request a copy of the Final EIS when it becomes available. Thank you for your consideration.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 110

Comment 1

As a Mackay School of Mines alumni, I am interested in mining projects throughout the State of Nevada. Thank you for letting me comment as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay. Please include my comments in the public record.

I am concerned with the vitality and flow of streams and springs throughout the State of Nevada and the West. However, it looks like EMLLC has a very thorough and rigorous monitoring program. The information the mine collects will help us understand the hydrology in the area - including how the Diamond Valley over-pumping is affecting conditions.
This will be helpful to protecting and preserving the water, which is the most important resource. The Mount Hope project should be approved because of this beneficial impact. Mining can be done responsibly and co-exist with other uses of the land.

The Mount Hope project seems to be fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 111

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.
There are many good reasons to support this mine and I hope it will be approved as soon as possible.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.

General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

We simply cannot be held hostage by the Chinese for the key, basic industrial materials so critical to our own domestic economy and other world markets.

It is important that the public have the ability to comment on projects of this nature as it affects many for years to come. Thank you for the opportunity to comment and please see that this worthy effort is allowed to be developed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 112

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.

The DEIS to evaluate General Moly's proposed Mount Hope mine is extremely thorough and demonstrates no significant impact to the environment. This project will create 400 good-paying jobs and will create additional revenue for the state of Nevada in the form of payroll taxes, mining net proceeds tax, and sales tax. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with this plan in a timely manner. It's the right thing to do.

I strongly urge you to consider helping to move this project forward to production which will help our economy, provide much needed jobs, and give America available resources that create true wealth.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 113

Comment 1

Approval of the Proposed Action as outlined in General Moly's DEIS will bring jobs and stability to Nevada. Mining projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen.

The study done to evaluate potential impacts from the project shows there won't be any significant impacts to Diamond Valley, which is the main competing use for water in the area. This is not just a claim by the mining company but is based on a series of technically robust scientific analyses.

Today, with the extreme recession facing our nation, the mining industry offers a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. The sooner this project is approved, the sooner we can put Americans to work.

Thank you for reviewing my comments. This project is deserving of approval and should not be delayed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 114

Comment 1

The preferred alternative as outlined in the Bureau of Land Management's DEIS for the Mt. Hope mine should be approved immediately. Any American operation that puts people back to work should be supported in these tough economic times.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

The mitigation includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that. Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 115

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine.

If Eureka Moly LLC has the rights to mine Mt Hope, through legal control of valid claims, they should be allowed to mine. The same goes for the water rights.

Now's the time to move in the mining industry. General Moly's DEIS is the way forward. Thanks to the BLM for presenting this project for approval.

Our country needs to get back to work. And Mt Hope is a shovel ready job!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 116

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine.

If Eureka Moly LLC has the rights to mine Mt Hope, through legal control of valid claims, they should be allowed to mine. The same goes for the water rights.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

General Moly's DEIS is thorough and deserves approval. We need to do everything we can to strengthen and grow the economy of Nevada and the west in general. This proposed mine will do just that. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 117

Comment 1

Allow me to voice my strong support for the proposed mine at Mount Hope.
As outlined in the DEIS, the BLM very thoroughly examined this proposal and the other alternatives and I wish to support the proposed action outlined in the DEIS.

Water is certainly a concern, and the monitoring program will ensure that any impacts from the Mount Hope Mine are well understood. This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine was not developed.
Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

The growing worldwide steel industry needs a reliable source of molybdenum. We need to develop thsese resources so that we can create income for local citizens. There is no fear greater than the hopelessness of being jobless and/or unemployable. Clearly, there are competitive pressures in the development of any new resource, but the capability of our country to generate income through otherwise unusable land generates pure profit. I appreciate the planning that General Moly has exhibited in its proposal for the Mt Hope mine and wish to thank the BLM for its consideration in moving this project forward.

I thank you for your time and consideration when reviewing this project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 118

Comment 1

As a supplier of products and services to the mining industry, Dyno Nobel is extremely interested in seeing the General Moly's Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades and understand that Nevada is at the bottom of the list with the only bright spot in the state being the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what is understood, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit Dyno Nobel, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for Dyno Nobel, but for the general well-being of the citizens of Nevada.
Thank you for your time and interest in this matter.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 119

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 120

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

This plan will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental protections are put in place. This is what Nevada and the nation needs in our present economy. Please approve this plan as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 121

Comment 1

I support the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will operate this mine in an environmentally sound manner.

There are economic and social benefits to approving this project. The Mount Hope project is fully financed through strategic joint venture and off-take relationships. In these trying economic times Nevada needs to support projects that will grow our economy.

The EIS demonstrates that a modern mine can operated in manner that produces minerals while protecting the environment and enhancing the socio-economics of a region.

As a resident of White Pine County, employment opportunities are limited.
The presence of a long term employer within communiting distance is very important to us!

Please approve this project!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 122

Comment 1

As an employee of a company that supplies products to the mining industry, I am interested in seeing General Moly's Mt. Hope project in Eureka, NV receive all requisite permits required to begin its operation. More importantly, as a long time and concerned citizen of Nevada, a state in economic trouble and one that depends heavily upon its mining industry, I support any environmentally sound mining venture that can help bring economic relief to our state and to the businesses that rely upon this. I view General Moly's Mt. Hope project as such a venture. From my knowledge of mineral processing in general and General Moly in particular, I see no justified reason why unfounded obstacles to the permitting of this operation should be imposed upon it by Eureka County Commissioners or any other governmental entity.

I and my entire family, Nevada residents all, support and favor the expedited start-up of General Moly's Mount Hope project. It will bring much needed economic and employment value to our state of Nevada and to the Unites States as well.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 123

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations

that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

By tapping into our abundant natural resources here at home, our economic outlook could be vastly improved. As an American company, run by American management and a majority of American shareholders, General Moly's Mount Hope project will contribute greatly to our economy.

The BLM has done a great job of evaluating General Moly's Mt Hope mine proposal. I am convinced that this project should be approved without further delay.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 124

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

With the BLM as the lead agency, this Draft Environmental Impact Statement has covered all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 125

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

When faced with a poor economic outlook, one must look for ways to improve the situation. General Moly's proposed mine at Mount Hope offers just such a solution and deserves approval. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 126

Comment 1

Please move forward with Bureau of Land Management's Preferred Alternative as detailed in Chapter 2 of the Draft Environmental Impact Statement.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Furthermore, even if it did work economically (which is highly doubtful), as you point out "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 127

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

Water is certainly a concern, and the monitoring program will really ensure that any impacts from the Mount Hope Mine are well understood.
This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine didn't get built. Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 128

Comment 1

I would like to contribute to the public commentary on the Mount Hope mine proposal and voice my support for the preferred alternative. Please support this proposal and help get this project moving.

Wild horses are overpopulating the range and destroying the values of a balanced ecosystem. The wild horse mitigation for the Mt Hope project will help BLM be better able to balance the population. This project is socio-economically beneficial on many levels.

The agency was correct in the alternatives in the "considered and eliminated from consideration" category, as well as in analyzing but dismissing the others. For example, while you must consider a No Action Alternative, it would be an incredible waste of a valuable resources and of an opportunity for economic benefit to many, many people. It was also wise to not select the Slower, Longer Project Alternative. While it may sound appealing, this approach would not lead to a longer mine life, but would more likely result in the project's economics not penciling out and become a de facto No Action Alternative.

I sincerely appreciate the opportunity to submit these comments on the DEIS. Let's get this project moving so there are more good-paying jobs in the U.S.A.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 129

Comment 1

I write today in support of General Moly's molybdenum mine. This is a project that is easy to support because it will benefit families both within and outside of its central Nevada location. The proposed alternative presents a path to employment for many-let's makes it happen.

Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

Mining is a tough industry fraught with uncertainty. The Mount Hope project, however, offers all the economic benefits of a long-term mine without any of the uncertainty of certain types of mining. Molybdenum is needed by the steel industry and will be for the foreseeable future. Let's give it a boost by approving this EIS.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 130

Comment 1

I say let's get moving with the Mount Hope mine and implement your Preferred Alternative ASAP.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

I am concerned with the vitality and flow of streams and springs.
However, it looks like EMLLC has a very thorough and rigorous monitoring program. The information the mine collects will help us understand the hydrology in the area - including how the Diamond Valley over-pumping is affecting conditions. This will be helpful to protecting and preserving the water, which is the most important resource. The Mount Hope project should be approved because of this beneficial impact.

As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision. This draft has done exactly that, and therefore it's time to move ahead so more than 300 families can have the security of long-term, good-paying jobs.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 131

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 132

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include: no endangered species at the site; only a little pit de-watering is required; no wetlands; no sacred sites.

Wildlife is important to me and wildlife in Nevada needs to be protected.
The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations.
This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to NV.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

I applaud the BLM's work on this Draft EIS. It is a more-than thorough "hard look" at the impacts of the Mount Hope Project and reaches the right conclusion, that this project needs to move ahead. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 133

Comment 1

I recommend you approve the Mount Hope mine, and that it be approved as soon as possible. The preferred alternative clearly outlines a plan that works for the benefit of mining and conservation in Nevada and that will extract a commodity that is in demand by the worldwide steel market.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 134

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

This mine will provide a needed commodity while having a modest environmental impact. Some of the environmental aspect that make this an excellent location and use of the land include: no endangered species at the site; only a little pit de-watering is required; no wetlands; no sacred sites.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 135

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 136

Comment 1

America needs jobs. America needs domestic sources of materials. America does not need more obstructionist overpaid biased bureaucrats doing studies intended to find away to stop job creation in the worship of earth as a diety. Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 137

Comment 1

I would like to state my support, to the BLMs public comment period, for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

I believe these jobs are important for both rural and all of Nevada, and projects like these help maintain a strong United States. I also believe the appropriate environmental safeguards have been addressed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 138

Comment 1

Please accept my comments on the proposed alternative for General Moly's Mount Hope DEIS. I approve of this plan and would like to see its quick implementation.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations

that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

With the BLM as the lead agency, this Draft Environmental Impact Statement has covered all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 139

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Molyï¿½s Mt Hope mine.

The mitigation includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that. Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay. Thank you for allowing me the opportunity to comment.

I was in the Mining industry for over 25 years (15 at Round Mountain NV, 8 in Montana, 3 in New Mexico). Changed to Gas and Oil because the market for mining is so unreliable and permitting is so lengthy. Please make America stronger by putting Mining back into our industries.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 140

Comment 1

The proposed molybdenum mine at Mount Hope should be approved. General Moly has a clear and environmentally-sound plan outlined in the proposed action to make this mine a reality and it will do much to contribute to the economy and vitality of the region and the country.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

Thanks again to the BLM for allowing public comment on this important proposal. It should go forward as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 141

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and

ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

With the increasing worldwide demand for aircraft and renewable energy projects, the American steel industry needs a reliable and abundant source of molybdenum. As you know, molybdenum is primarily used in the steel industry to strengthen carbon and stainless steels and to reduce corrosion. It makes steel capable of handling high stress and temperatures. General Moly's Mount Hope Project has the ability to produce the molybdenum necessary to keep this industry strong and able to supply the world's need for steel.

The growing worldwide steel industry needs a reliable source of molybdenum. I appreciate the planning that General Moly has exhibited in its proposal for the Mt Hope mine and wish to thank the BLM for its consideration in moving this project forward.

Natural resource development and protecting the environment are not mutually exclusive. With proper planning, as demonstrated by General Moly, resources can be developed with very little impact to the environment.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 142

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 143

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 144

Comment 1

It is with great concern for the environment that I write to ask your support of the BLMs preferred alternative in General Moly's proposed Mount Hope mine project. The pains that have been taken to strike a balance between environmental and economic concerns is impressive. This project is an example of how mines should be developed and I would like to see it move forward without delay.

By tapping into our abundant natural resources here at home, our economic outlook could be vastly improved. As an American company, run by American management and a majority of American shareholders, General Moly's Mount Hope project will contribute greatly to our economy.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 145

Comment 1

As a supplier of products and services to the mining industry, Petrochem is extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
At a proposed 400 permanent jobs, the Mt. Hope Mine will help diversify the mining industry in Nevada and will bring Nevada and Eureka County much needed economic development. Besides the mine itself, the support businesses necessary will bring in additional dollars and prosperity to the existing businesses in Eureka County.
I have read reports that the Board of Eureka County Commissioners are attempting to delay the permitting process of General Moly's Mt. Hope project. It is hard to understand why a government entity such as the Eureka County Commission, which is well-funded primarily from mining tax revenue, would take actions that could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I have read, Mt. Hope is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada. The additional efforts by the company to help provide housing, make land access available to the Native American community, and avoid damaging cultural resources in the area show their desire and intention to be good neighbors.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 146

Comment 1

As a manager of a Reno staffing company, I can see where opening the Moly mine in Eureka would provide jobs in the construction field for many unemployed workers here in Reno. A sincere effort has been put forth to make sure enviromental concerns have been addressed. I support the Moly Mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 147

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

Congratulations on presenting a Draft Environmental Impact Statement that clearly outlines a project deserving of support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 148

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Furthermore, even if it did work economically (which is highly doubtful), as you point out "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

Thank you for letting me submit this letter in support of the project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 149

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and

with great economic benefit.

I have great appreciation for wild horses, and the mitigation proposed for the Mt Hope project will provide water to horse populations that can experience severe water stress. If for no other reason, this project should be approved for the beneficial impacts to the wild horses.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

With the BLM as the lead agency, this Draft Environmental Impact Statement has covered all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 150

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible. Mining and mineral production is essential to the long term strategic interests of this country, and I firmly believe we should concentrate on expanding our domestic production of all mineral materiels over foreign imports.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

The BLM has done a great job of evaluating General Moly's Mt Hope mine proposal. I am convinced that this project should be approved without further delay.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 151

Comment 1

Approval of the Proposed Action as outlined in General Moly's DEIS will bring jobs and stability to Nevada. Mining projects can easily contribute to the economic recovery of this nation and this project is ready to make that happen.

The study done to evaluate potential impacts from the project shows there won't be any significant impacts to Diamond Valley, which is the main competing use for water in the area. This is not just a claim by the mining company but is obviously a very expensive and technically robust scientific analysis. If this level of detail is representative of the studies done for this EIS, then without question the analysis is adequate.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

Thanks again to the BLM for allowing public comment on this important proposal. It should go forward as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 152

Comment 1

We are writing on behalf of our many business stakeholders, and particularly our 120 employees who are located in the state of Nevada, to encourage support of the General Moly's Mt. Hope Project.
We represent Purcell Tire and Rubber Co., who purchased a Nevada company, D&D Tire Inc, in 2008. We provide products, service, and consultation to mines across North America and Mexico. We have been operating in the State of Nevada for almost 30 years. Matt Johnson is a lifelong Nevada Resident, who has worked in the Mining Industry for most of his life.
We plan on supporting the Mt. Hope project with our Tire Management Program. The main purpose of our Tire Management Program is to help mines to improve tire performance, reduce the amount of tires consumed, reduce overall mining costs, and provide a recycling program for their worn out tires. This helps the mine to decrease their carbon footprint and reduce their environmental impact in relation to tires.
In our understanding, General Moly is committed to reducing their environmental impact and following any established guidelines, regulations, and policies from Federal and State agencies.
With our current economic recession, Nevada is one of the hardest hit states. Mining is one of the main lifelines we have to help Nevada through this tough time. This project brings many new jobs and a positive economic effect to our communities, especially with our state unemployment rate at 12.2% (Nov 2011). In a time of severe recession, we believe the overall value this project brings to local citizens and our government is far more positive than just simply the estimate of the number of jobs it creates. It will help bring a diversified mining industry to Nevada, boost our economic development, and strengthen our local communities.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 153

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

Now's the time to move in the mining industry. General Moly's DEIS is the way forward. Thanks to the BLM for presenting this project for approval.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 154

Comment 1

Approval of the Proposed Action as outlined in General Moly's DEIS will be an asset to the continued rehabilitation of the Nevadan economy, by helping to bring jobs and tax revenue to the State of Nevada. Mining this resource will help develop income for the state, but also reduce importation, and thus go somewhat towards changing our National balance of payments.

The United States has the natural resources that can help pull us out of our current economic depression. With abundant stores of molybdenum, General Moly's proposed Mount Hope mine is an example of such a resource that should be put to use in this cause.

The agency was correct in the alternatives in the "considered and eliminated from consideration" category, as well as in analyzing but dismissing the others. For example, while you must consider a No Action Alternative, it would be an incredible waste of a valuable resources and of an opportunity for economic benefit to many.

This project is the type of "oven" ready Project that helps provide employment, international income through exports, roll on benefits to non mining sectors of transportation, commerce and port authorities, and saves national expenditure abroad. We need to help get this great nation back on its feet

Thank you for reviewing my comments. This project is deserves approval and should not be delayed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 155

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

Water use proposed by the mine is well-thought out. They are planning to pump only what they need to produce the molybdenum, and they plan to recycle a lot of water back from the tailings pond to the mill circuit.
This is an environmentally sound approach and will make the project sustainable for generations to come.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

General Moly's mine at Mount Hope will create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 156

Comment 1

The Draft Environmental Impact Statement and the Preferred Alternative for General Moly's proposed molybdenum mine should be approved and the mine should be allowed to move forward. It's good for central Nevada and her neighbors.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

Wild horses are overpopulating the range and destroying the values of a balanced ecosystem. The wild horse mitigation for the Mt Hope project will help BLM be better able to balance the population. This project is socio-economically beneficial on many levels.

Despite the nit-picking from naysayers, this EIS exhibits that a modern mine can be planned by a company and evaluated by an agency in ways that allow for production that provides necessary minerals while protecting the environment and enhancing the socio-economics of a region. Job well done!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 157

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support

the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

Water is certainly a concern, and the monitoring program will really ensure that any impacts from the Mount Hope Mine are well understood.
This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine didn't get built. Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 158

Comment 1

I have reviewed the Mt. Hope project Draft EIS in detail and it appears to be very complete. I support the Mt. Hope project being permitted and allowed to move forward into operation. More than ever before, our country needs this kind of investment, the job creation that will result, and the overall economic benefit that will derive from the operation. I am convinced that the project can be developed in an environmentally and socially responsible manner.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 159

Comment 1

As a contractor of services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Maly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 160

Comment 1

Snyder Mechanical is supplier of goods in services, having served the mining industry for almost 30 years in Nevada. As a valued business partner in the mining industry, we remain hopeful that General Moly's Mount Hope molybdenum mine in Eureka, Nevada obtains its federal and state permits, commences construction and begins minima operations.
As an employer of 25 to 50 valued employees. Mount Hope could potentially add a significant economic boost in Nevada. Our valued employees and their families rely heavily on the success of the local mining industry. Mount Hope will provide opportunities not currently available in today's local economy.
In addition to an economic resource, General Moly's Mount Hope project possesses a team of competent and experienced leaders, committed to environmental compliance. Snyder Mechanical endorses General Moly's efforts in applying for and obtaining, the requisite permits. It is our plea that any entity, governmental and nongovernmental, refrains from imposing unfounded and unnecessary obstacles as a means to delay the already thorough and comprehensive permitting process. Indeed such obstacles will establish a dangerous precedent that could jeopardize General Moly's Mount Hope project and other future natural resource projects.
While Snyder Mechanical desires General Moly's Mount I lope project to directly benefit it and its employees and their families, it will also have a significant economic impact on many businesses not providing goods and services directly to General Moly. Delay or preclusion of the Mount Hope project could negatively "trickle down" to many local and regional businesses. Therefore, this project will substantially augment Nevada's and the nation's economy during a time when our country and its citizens need it most.
Snyder Mechanical would like to add its name to those individuals and businesses that support General Moly's Mount Hope project in Eureka, Nevada
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 161

Comment 1

Allow me to submit my comments regarding General Moly's proposed mine at Mount Hope. I fully support this project and the Preferred Alternative as outlined in the DEIS.

I am an avid hunter and have used the Mt Hope area for hunting. However, there are not many jobs in the immediate area of Eureka. If hunters don't have jobs so they can live in the area where they recreate, it significantly reduces their hunting opportunities. In other words, bringing jobs to the area will increase the ability of hunters to take advantage of the hunting opportunities in this part of Nevada. This project will still allow access to many great hunting areas. Additionally, the project will provide needed employment so people interested in hunting can make a great wage in this outdoorsman's paradise area of NV.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.
General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

When faced with a poor economic outlook, one must look for ways to improve the situation. General Moly's proposed mine at Mount Hope offers just such a solution and deserves approval. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 162

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development. Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily

from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project Will substantially augment the State of Nevada arid our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 163

Comment 1

Ames Construction, Inc. is a heavy civil, mining and industrial general contractor that has maintained a local office in Carlin, Nevada since 1999. We are a major supplier of construction services to the US mining industry. Additionally, Ames has had its Western Regional headquarters in nearby West Valley City, Utah since 1985.
We have been following the development of the Mt. Hope Project for several years and have been anxiously awaiting their receipt of a Record of Decision and subsequent authorization to proceed.
We are very familiar with the project and have reviewed the Draft Environmental Impact Statement. We are very confident in General Moly's management and their commitment to environmental stewardship.
The design and construction of this project will provide hundreds of well-paying construction jobs for 18 months and another 400 long-term well-paying jobs for decades to come. These jobs represent a tremendous benefit to Eureka County, the State of Nevada, and economic benefits throughout the US as design firms are engaged and materials and equipment are purchased.
The Mt. Hope Project has our unqualified support!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 164

Comment 1

We have had the opportunity to interact with General Moly and its employees for six years here in Eureka, Nevada. We are business owners and have been in the community since the 1940's. We have seen the upturns and downturns in Eureka's economy first hand. Because we have not depended on a county or state job for our livelihood, we are perhaps more keenly interested in General Moly's presence here.
General Moly has been very active in the community as a whole as well as in the business sector. They have sponsored many events for the community as well as donated to many community programs, many of them for our children. They have shown a real commitment to our community and to keeping the community informed of their plans. The doors to their downtown office are always open and the opportunity to learn about their business plan is always there.
We feel that General Moly has been and will continue to be a very positive influence in our community. The jobs that will be created will be such a positive thing for Eureka and for the whole state. Jobs in this time are extremely important and the taxes derived for both county and state will be very beneficial. We feel it is well past time for our Eureka County Commissioners to stop impeding and start working with General Moly in a positive way. Every one has spent too much on legal fees and appeals. It seems the BLM and the State Engineer give credibility to General Moly's research and statements. It's time for all of us to get behind this project and realize the benefits!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 165

Comment 1

As a contractor to the mining industry, Peavine Construction is extremely interested in seeing the General Moly Mount Hope molybdenum mine in Eureka Nevada receive its federal and state permits which would allow it to commence construction and initiate operations. It is our understanding that the Mount Hope Project will be environmentally sound and that the General Moly management is committed to environmental stewardship and that it BLM and the State of Nevada
The Molybdenum at Mount Hope would directly benefit local Eureka businesses, Peavine Construction, its suppliers and subcontractors. The economic development of the State of Nevada will be positively improved by the approval of this project.
Peavine Construction will actively support the startup of General Moly's Mount Hope project in Eureka in any way possible.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 166

Comment 1

As a Eureka business owner and resident, I am writing a letter in support of the Eureka Moly's Mount Hope Project for the following reasons:
1. Without the mining industry in addition to all others forms of revenue, any productive growth in Eureka and the Eureka community will not be able to compete into future economically.
2. The lack of jobs that could have been produced by the Moly Mount Hope Project, would further a dismal economic prospect which already exist throughout Nevada, and therefore, will be greatly reflected and felt by all the residence and businesses in Eureka.
3. Additionally, established business in Eureka will eventually need to close because of lack of revenue.
4. Any prospect of new businesses and services will not want to open in Eureka because of lack of growth or growth potential.
5. And finally, this county and region of Nevada has always been a mining community.

Unfortunately, this issue with the ranchers and growers has become more of a political issue and one that can be quite profitable for those who are the most vocal. These same individuals cannot honestly say that it is just about water. I pose this question, has the water problem that has existed in Eureka County and Diamond Valley really been so compelling of a matter that the persons opposing the Moly Mount Hope Project, have addressed their water concerns before the present water issues of today. I also raise this question, was water conservation ever in place or was it ever considered to be a major concerned by these same people. So much in fact that every measure or effort was performed and addressed the crisis before the controversy that consumes this community now. I seriously doubt it.
It basically comes down this; it is about money and very little about the future of Eureka and its water. I personally would like to remain in this community. However, I will not if there is no longer a community to open my business in. So in closing, please take into consideration that I among many in Eureka and the valleys support this mining company bringing new vivacity into a disappearing community.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 167

Comment 1

Over the past few years extractive industries have contributed significantly to the economy in the United States. The jobs created are far reaching across many industries including the construction industry, which was heavily impacted by this most recent economic recession As a supplier of Products and/or services to the mining Industry, Layton Construction has a vested interest in the General Moly Mt. Hope molybdenum mine in Eureka, Nevada and would like to.. see this project receive the Federal and State permits that are pending approval.
As you are aware, we have experienced the worst economic conditions in decades, with Nevada one of the hardest hit. The mining industry is a critical source of desperately needed jobs and economic opportunity. The Mt. Hope project bolsters this opportunity for many citizens, while increasing revenue for Nevada.
The reports coming out of the Eureka area indicate that unnecessary obstacles to the permitting process are delaying the issuance of legal permits for the Mt. Hope project. These obstacles stem from the office of the Eureka County Commission, which has benefited greatly from mining tax revenues. This seemingly unfounded approach to General Moly's molybdenum project, not only jeopardizes this project, but future mining opportunities as well.

From the information I have been privy to, the Mt. Hope project is environmentally sound. General Moly's management has always been and contin.ues to be committed to environmental stewardship and its' responsibilities as a corporate citizen of Nevada. The Company's established policies are of the highest standards that we as a service provider have had experience with. General Moly infuses compliance with government regulations as well as respect for the enforcing authorities within its' corporate culture. Having worked with them over the years, we have noticed strict adherence to regulations enforced by the recognized authorities, including the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our Company, including employees and families, it will also generate extensive economic benefits for material suppliers and construction trades locally and regionally. The availability of molybdenum also creates wide-ranging value for many industries throughout our Nation's economy, compounding the positive affects greatly needed during these trying times.
For the above mentioned reasons, Layton Construction would like to add our name to those who support General Moly's Mt. Hope project in Eureka, Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 168

Comment 1

As a contractor who is involved in the mining industry, we at Q & D Construction. Inc. would really like to see General Moly receive its federal and state permits so it can begin operation on the Mount Hope molybdenum mine in Eureka, Nevada.
Nevada has seen such a dramatic loss in construction employment over the past 5 years that this project brings a ray of light for some of those workers. Right now, the mining industry is the leading employer amongst construction companies. Adding the Mount Hope Mine project will only strengthen the job market and also create economic development in our state.
I understand the Mount Hope project management team is committed to environmental stewardship and this is an environmentally sound project. I know they will have to comply with strict policies and regulations established and enforced by agencies such as the BLM and the State of Nevada.
We are hoping that this project will benefit our company and our employees, since we are not guaranteed any of the work. We are hopeful as any work we get, will also be passed on to our suppliers and subcontractors that we work with.
Again the number one reason this project makes sense is that it helps our struggling state and nation during a time when the construction worker needs it most.
I would like to add my name and also my companies name to the list of those who support General Moly's Mount Hope project in Eureka. This could be a big help in creating some work for Nevadans and create an economic boost for our state as well.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 169

Comment 1

As a supplier of products and services to the mining industry, we are extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, we understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, we have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
We understand the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada and our country.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 170

Comment 1

In 2007-2008, our company built the 162,180 square foot warehouse distribution center and offices for Caterpillar Logistics and Cashman Caterpillar in Elko, Nevada. This facility supplies parts for several of the mining sites of the Newmont Mining Company in the State of Nevada. This project created jobs during the construction of the facility and long-term jobs for many people who work within this facility.
We have had conversations with top level management personnel within Eureka Moly regarding the construction of a similar facility on land adjacent to the aforementioned property in Elko, Nevada. The Caterpillar facility has supplied many long-term jobs for the area, and also increased the tax base for the City and County of Elko, Nevada. A similar new facility for Eureka Moly would further increase long-term jobs for the area and further enhance the tax base. Due to constraints related to obtaining final approval to commence it's mining activities, Eureka Moly has not been in a position to provide a firm commitment to have such a facility built for them in Elko, Nevada; however, they certainly have a strong desire to build a facility similar to the large Caterpillar Facility. As an entity that provides warehouse and office facilities to the mining industry, I am extremely interested in seeing the Eureka Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
Our country is suffering from the worst economy in decades, and Nevada is at or near the bottom of the list of states suffering at this time. It appears that the only bright spot in the state of Nevada is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development for many, many years. As a national real estate developer, I quite often find that States and local communities work very hard in providing incentives in order to attract companies to operate in their State / Community. Most States and Communities in other States offer such incentives in order to provide long-term jobs and economic relief to both the State and Community. In the case of the Eureka Moly Mt. Hope Project, it appears that certain Governmental entities are taking quite the opposite approach by tying to delay or halt what could be extremely lucrative benefits to the State of Nevada, it Communities and the nation as a whole from the mining operations associated with the Eureka Moly Mt. Hope Project.

An example of trying to delay or halt the Eureka Moly Mt. Hope Project, are the actions that the Board of Eureka County Commissioners in continually putting up unfounded and unnecessary obstacles to delay the permitting process of Eureka Moly's Mt. Hope Project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope Project, but future natural resource projects as well.
From what I understand, the Mt. Hope Project is an environmentally sound project. The management at Eureka Moly is (i) experienced in the mining industry; (ii) is committed to environmental stewardship; and (iii) will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon: (i) many people and their families that need good paying, long-term jobs; (ii) the suppliers from whom we make our purchases (iii) the City of Elko; (iv) the County of Elko; (v) the State of Nevada; and (vi) the economy of our entire nation.
In summary, this worthwhile project will substantially augment the State of Nevada, the many mining communities supporting mining operations, and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of Eureka Moly's Mt. Hope Project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada, and our great nation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 171

Comment 1

Ames Construction, Inc. is a heavy civil, mining and industrial general contractor that has maintained a local office in Carlin, Nevada since 1999. We are a major supplier of construction services to the US mining industry. Additionally, Ames has had its Western Regional headquarters in nearby West Valley City, Utah since 1985.
We have been following the development of the Mt. Hope Project for several years and have been anxiously awaiting their receipt of a Record of Decision and subsequent authorization to proceed.
We are very familiar with the project and have reviewed the Draft Environmental Impact Statement. We are very confident in General Moly's management and their commitment to environmental stewardship.
The design and construction of this project will provide hundreds of well-paying construction jobs for 18 months and another 400

long-term well-paying jobs for decades to come. These jobs represent a tremendous benefit to Eureka County, the State of Nevada, and economic benefits throughout the US as design firms are engaged and materials and equipment are purchased.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 172

Comment 1
I am a small business owner who relies on Nevada work including the Mt. Hope project.

To support my employees, their families and my suppliers I am strongly in favor of the project and would like to see the necessary permits be approved in a timely manner so the project can proceed.

The strong environmental safeguards enforced by the State of Nevada and BLM and the sizable investment proposed by the company reassures me that there should be no unnecessary delays for political election year posturing and this project should be approved as soon as possible.

I have watched with alarm as the State of Nevada has regressed during the current downturn and applaud any venture that is willing to take the mining risk and invest the capital needed to diversify our economy from its gaming base.

My experience is that the General Moly management is dedicated to being a good steward of the environment and will work to make this a showcase to repair misconceptions of uncaring mining companies that happened before the BLM and EPA enacted the strong legislation that they now use to enforce compliance.

American Assay Laboratories (a Nevada based corporation) supports the startup of General Moly's Mt. Hope project in Eureka, for myself, my employees, my suppliers and the State of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 173

Comment 1
Having been a resident of Nevada for the past 72 years and having been in business in Nevada for the last 48 years, I would like to address the economic condition that exists within our state I've been involved with the economic diversification in northern Nevada for the last 30 years and the last four years the economic condition of our state has failed in a big way.
Economic diversification is not only about bringing building, manufacturing or warehousing to our state, that is a part of it, but in my opinion mining is a large and important part of economic diversification within the State of Nevada. I feel it extremely important that the General Moly Mt. Hope project in Eureka, Nevada receive its federal and state permits and begins operations.
From what I understand the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
Even though this may or may not benefit Q & D Construction, it is important that this project moves forward. It will employ a lot of unemployed people in northern Nevada and will help with the recovery of our state's economic condition. I can only speak for Q & D Construction on the economic condition of our state, we use to employ 1152 people, today we are employing 268 and struggling to keep them busy, we have had to go out of state in order to stay in business.
It is important that every local, county and state of Nevada agency as well as the Federal government support this project and help expedite it getting under way as soon as possible.
I would like to add Q & D Construction to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for General Moly, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 174

Comment 1

I work for a heavy civil, mining and industrial general contractor that has maintained a local office in Carlin, Nevada since 1989. I have been following the development of the Mt. Hope Project for several years and have been anxiously waiting for them to secure the required regulatory approval and the project to break ground.
It appears the Company has retained many qualified persons and allot of extensive work for the project and the Draft Environmental Impact Statement.I am very confident in General Moly's management and their commitment to environmental stewardship.
The design and construction of this project will provide hundreds of well-paying construction jobs for 18 months and another 400 long-term well-paying jobs for decades to come. These jobs represent a tremendous benefit to Eureka County, the State of Nevada, providing long¬term economic benefits so I can continue to live in the great State of Nevada.
I support the Mt. Hope Project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 175

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 176

Comment 1

We are 100% behind the project and need BLM to make favorable conditions to start operations.

The science is good, the need for the state and local community by way of jobs and income is badly needed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 177

Comment 1

I am a local business owner and active resident. Our store, Raine's Market, has been in business since 1973. The grocery store itself has been in business in Eureka since 1929. The Raine Family expanded the store shortly after purchasing it and when the time is right

we will consider a new location and a larger store with an expanded variety of goods and services. Raine's Market has served the Eureka area for nearly 39 years and we plan to serve this area long into the future.

Our family is sixth generation Eurekan. We and our business have been through the ups and downs of the local economy and we recognize the impacts of mining in Eureka County. Our business has benefited from the mining industry and our county is fortunate to benefit so greatly from the taxes paid by mining and the contributions afforded us through mining.

General Moly has impressed me as a good neighbor and their presence in this community has already been a benefit to the community. They have shown their support by contributing to several local organizations, donated to the schools through funding of projects and scholarships, and they are utilizing existing local businesses whenever possible. These are actions of a company that wants to be a part of a community.

Mt Hope Mine will bring jobs and growth. I have witnessed the Mt Hope Mine debate closely, studied the DEIS and my opinion is that if the project is within permitting guidelines and if it is done correctly, including appropriate mitigation for any problems, then let it be done and get out of the way of this company.

Just like ranching, mining has been part of Eureka County since its beginning. Mining and ranching have worked side-by-side throughout our history, it does now and it will again.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 178

Comment 1

I am pro Eureka Moly. The Moly mine will be a community asset. To lose it would set the community back financially and culturally. Eureka Moly has invested about 20 million dollars and years of effort in trying to get the mine started. They seem to be thwarted by the three county commissioners who have spent about two million dollars fighting the mine with no explanation as to why. They are not serving their constituents well. Eureka is somewhat of a back water and would not exist except for mining. The housing area at the west end of town was planned to house miners with no mine the housing area will not be used. Money wasted.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 179

Comment 1

I HAVE BEEN A RESIDENT OF NEVADA SINCE 1950 AND HAVE BEEN A REAL ESTATE BROKER SINCE 1973 AND A CERTIFIED GENERAL APPRAISER SINCE 1992 AND ALSO A MANUFACTURED HOME DEALER LIVING IN ELKO COUNTY FORMERLY AND IN EUREKA COUNTY SINCE 2007.
I HAVE HAD MIXED FEELINGS ABOUT THE PROJECT WITH THE UNDERSTANDING THAT 20% OF THE GENERAL MOLY COMPANY IS NOT U.S.A. OWNED AND THAT THE CONTRACTS FOR THE ORE ARE GOING TO GERMANY AND KOREA. THIS MAY NOT BE THE CORRECT, CURRENT SITUATION.
FOR THE MOST PART, I AM IN FAVOR OF THE PROJECT FOR THE FOLLOWING REASONS:
1. HIGHEST AND BEST USE OF THAT AREA IS FELT TO BE FOR MINING FOR THE AREA BENEATH THE SURFACE.
2. I FEEL AN OWNER OF THE PROPERTY SHOULD HAVE THE RIGHT TO DEVELOP IT FOR ITS HIGHEST AND BEST USE AND THAT THE OWNER SHOULD BE ABLE TO EXERCISE ALL HIS BUNDLE OF RIGHTS THAT GOES WITH THE LAND.
3. I AM HOPING THIS AREA WILL GROW SO THAT EUREKA COUNTY CAN HAVE A HOSPITAL AS U IS THE ONLY COUNTY THAT DOES NOT HAVE A HOSPITAL IN THIE AREA. I LOST MY HUSBAND A YEAR AND A HALF AGO AND A HOSPITAL HERE IN EUREKA WOULD HAVE BEEN A GREAT BLESSING.
4. A PHARMACY AND MORE STORES WITH COMPETITION ARE NEEDED SO WE DON'T HAVE TO TRAVEL TO ELKO, ELY, OR FALLON FOR GOOD BUYS. I WOULD LIKE TO SEE THE PEOPLE LIVE HERE NEAR THE MINE AND NOT HAVE TO RIDE BUSES EACH DAY TO WORK.
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Comment 2

5. I HAD SUGGESTED LAST YEAR PUMPING THE WATER FOR THE MINE TO A HOLDING RESERVOIR NEAR MT. HOPE IN THAT DRAW NEAR THE PONY EXPRESS NEW KIOSK OFF WEST OF HIGHWAY 278. THIS WOULD HELP THE MINE IN HAVING A RESERVOIR OF WATER IN THE EVENT THAT THERE WAS AN PROBLEM WITH WELL PUMPING CONTINUALLY. A SCREEN COULD BE PUT ON THE INTAKE FROM THE RESERVOIR TO THE MINE SO THAT FISH COULD BE PLANTED IN THE RESERVOIR. THIS WOULD PROVIDE MUCH NEEDED NUTRITIOUS FOOD IN TIMES OF FAMINE OR DROUGHT AND ALSO COULD BE A RESTING PLACE AND RECREATION SITE FOR RESIDENTS AND TOURISTS AS THERE IS NO CLOSE FISHING AREA IN EUREKA.
Disposition: Comment acknowledged; does not provide new information

Response

CC-071-Alternatives to Water Use

Comment 3

6. DRAWING OF THE WATER IS AN ISSUE. THE ADJOINING WHITE PINE COUNTY HAS HAD SEVERAL OF ITS RANCHES' WATER RIGHTS SOLD TO THE CITY OF LAS VEGAS. PIPE IS BEING STOCKPILED AT LUND TO TRANSPORT THIS WATER ONCE THE POWER PROBLEM IS SOLVED. EUREKA COUNTY WILL BE RIGHT IN THE MIDDLE OF THE TWO WATER DRAWING SOURCES. DIAMOND VALLEY HAS HAD WATER PROBLEMS AND RESIDENTIAL WELLS HAVE GONE DRY AND THE OLD PONY EXPRESS STAGE STOP RANCH ON NORTH END OF VALLEY HAS HAD PROBLEMS AS WELL AS THE SADLER RANCH IS NOT LIKE IT USED TO BE FOR WATER AND HAY RAISING.
IT LOOKS LIKE SOME KIND OF AGREEMENT COULD BE REACHED THAT IF EUREKA'S WATER LEVEL GETS BELOW WHERE IT SHOULD BE THAT FARMS AND RANCHES CAN'T OPERATE, THAT THE REMAINING WATER BE ALLOCATED SOMEHOW TO THE USERS TO SURVI VE THE CRISES.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Comment 4

OVERALL, I AM IN FAVOR OF THE MT. HOPE MINE BEING A GOOD VENTURE FOR THIS AREA AND THE OWNERS AND THE STATE OF NEVADA.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 180

Comment 1

Why by from China whene we can produce it here. Lets keep America working
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 181

Comment 1

I'm in great support of General Moly it would be good for Nevada with the jobs and Nevada really need the jobs. I think that their study has been done well and they are a good company.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 182

Comment 1

While the rest of the country is in a slow downward depression, we should not stop jobs, why bring Molly from China.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 183

Comment 1

My family moved here to work at Cortez and need seady work, and is a good community and quiite am very conservative.
Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 184

Comment 1

I am a supporter of the Moly mine. I think as a country we need any employment opportunities we can get. We also need to do anything we can to not import materials from other countries when we have them here. Nevada needs the work and tax revenue.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 185

Comment 1

I think Mt. Hope is awesome. We are in total support of Mt. Hope.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 186

Comment 1

I am in support of Mt. Hope it will be good for the economy.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 187

Comment 1

We hope Mt. Hope goes so our daddy's can get jobs.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 188

Comment 1

I wholeheartedly support Eureka Moly in their venture to open the mine called the Mt. Hope project.
I believe their operation will provide hundreds of jobs directly and countless others indirectly. Modern mining is proven to be good stewards of their communities and the environment. Mt. Hope has the potential to provide good paying careers for decades to come.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 189

Comment 1

The Mt. Hope Project is great. It brings employment to the county and increases revenue. The company has quality representatives who are willing to work with the volunteers who bring the community together.

I don't know too much about the project but I am open for something new including jobs and more people in the community.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 190

Comment 1

Mt. Hope has hope we are in support of them.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 191

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.
There are many good reasons to support this mine and I hope it will be approved as soon as possible.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

I can't think of one good reason why this mine shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 192

Comment 1

Thank you for accepting comments in regards to the Mount Hope project's Draft Environmental Impact Statement. The outcome of this issue will have a lasting effect on the people of Eureka County and Northern Nevada.
Our company is Grove Madsen Industries, headquartered in Reno, NV. As a supplier of electrical distribution equipment and process controls, we employ 28 in Northern Nevada and a total of 60 in the state. The opening of the Mt. Hope mine would support several employees and their families. Our sales staff, technical support, warehouse and administration departments have a long history of working with the mining community.
We support the opening of the Mt. Hope molybdenum mine and are encouraged the DEIS indicated no areas of critical environmental concern. We have learned of the impressive $4 million Water Sustainability Trust which will develop and implement programs that will serve to enhance the sustainability and well-being of the agricultural economy in the Diamond Valley groundwater basin. We understand this is an unprecedented water monitoring, management and mitigation program and demonstrates General Moly's commitment to the environment.
We look forward to the potential opening of the Mt. Hope mine, as the social and economic impact would be significant for the town of Eureka, and our region in general. Thank you for taking time to read these comments,
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 193

Comment 1

Americans urgently need jobs and General Moly is ready to provide them.
Please approve the preferred alternative as proposed in the Draft Environmental Impact Statement and help get Americans back to work.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Furthermore, even if it did work economically (which is highly doubtful), as you point out "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

Thank you for letting me submit this letter in support of the project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 194

Comment 1

I appreciate the BLM offering this opportunity to comment on General Moly's DEIS. The mine at Mt Hope will bring many good paying jobs to Nevada and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression.

I am concerned with the vitality and flow of streams and springs.
However, it looks like EMLLC has a very thorough and rigorous monitoring program. The information the mine collects will help us understand the hydrology in the area - including how the Diamond Valley over-pumping is affecting conditions. This will be helpful to protecting and preserving the water, which is the most important resource. The Mount Hope project should be approved because of this beneficial impact.

General Moly is creating American jobs and boosting the economy of the State of Nevada at a time when many around the nation are suffering from lack of work. Not only will General Moly's Mount Hope Project improve the economic well-being of the area immediately surrounding it, but will also do a great deal to improve our economic well-being nationally. This mine will reduce the national trade deficit by around $600 million annually and generate $50 million per year in Federal, State, and local taxes.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.

This plan will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental protections are put in place. This is what Nevada and the nation needs in our present economy. Please approve this plan as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 195

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

Thank you for your consideration. I look forward to seeing this project come to fruition.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 196

Comment 1

The Draft Environmental Impact Statement and the Preferred Alternative for General Moly's proposed molybdenum mine should be approved and the mine should be allowed to move forward. It's good for central Nevada and her neighbors.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

The mitigation includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that. Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of

the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 197

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.

Thank you for your consideration. I look forward to seeing this project come to fruition.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 198

Comment 1

Allow me to submit my comments regarding General Moly's proposed mine at Mount Hope. I fully support this project and the Preferred Alternative as outlined in the DEIS.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

General Moly's mine at Mount Hope will create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 199

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 200

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 201

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 202

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

Water is certainly a concern, and the monitoring program will really ensure that any impacts from the Mount Hope Mine are well understood.
This is a better and more comprehensive monitoring plan than the farmers could ever afford or would otherwise be put in place if the mine didn't get built. Besides monitoring impacts from the mine, it will also show the farmers the ongoing impacts from their pumping. That is an added benefit that is not stated in the EIS but is valuable to the water rights holders in Diamond Valley.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible. Thank you for considering my comments.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 203

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 204

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

I certainly have benefited from Moly during my life. Having worked for AMAX for 20 years at the Henderson Mine/Mill and Climax Mine I can speak with authority about the benefits for my family as well as the communities served by these mines. Moly supported my family, educated my children and provided a decent wage for us.

Concering the communities - Moly provided tax revenues and well paying jobs - all benefited.

Please speed the approval process along so as to reap the many benefits associated with this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 205

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 206

Comment 1

The steel industry needs molybdenum and it might as well come from the United States. We have the resources and General Moly has a plan to make it happen at Mount Hope. Please support the preferred alternative.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.

Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 207

Comment 1

I'm writing in support of General Moly's molybdenum mine in central Nevada. I recommend you approve the mine and move forward with the preferred alternative, which will create jobs and economic benefit for a wide region.

The agency was correct in the alternatives in the "considered and eliminated from consideration" category, as well as in analyzing but dismissing the others. For example, while you must consider a No Action Alternative, it would be an incredible waste of a valuable resources and of an opportunity for economic benefit to many, many people. It was also wise to not select the Slower, Longer Project Alternative. While it may sound appealing, this approach would not lead to a longer mine life, but would more likely result in the project's economics not penciling out and become a de facto No Action Alternative.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 208

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

The United States has the natural resources that can help pull us out of our current economic depression. With abundant stores of molybdenum, General Moly's proposed Mount Hope mine is an example of such a resource that should be put to use in this cause.

Congratulations on presenting a Draft Environmental Impact Statement that clearly outlines a project deserving of support. Thank you for accepting public comment in this matter. I hope this project can commence in short order.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 209

Comment 1

Please take steps to allow the Mount Hope mine to move forward by implementing your Preferred Alternative ASAP.

Wildlife is important to me, and wildlife in Nevada does need to be protected. The mitigation for Mt Hope includes burial of powerlines and pipelines in the wellfield which will be a huge help to the sage grouse populations. This shows that the Mt Hope project will benefit wildlife, especially the sage grouse while still bringing this important project and the accompanying jobs to Nevada.

Today, with the extreme recession facing our nation, the mining industry seems to greatly help with a needed recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum needed by the steel industry worldwide.
If mining can provide assistance with an economic recovery, shouldn't we all support this project going forward?

Thank you for reviewing my comments. This project is deserving of approval and should not be delayed any further. It has already taken too long to receive approvals.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 210

Comment 1

The Draft Environmental Impact Statement and the Preferred Alternative for General Moly's proposed molybdenum mine should be approved and the mine should be allowed to move forward. It's good for central Nevada and her neighbors.

The Proposed Alternative for General Moly's Mount Hope project should be approved. It will get the project off the ground in the most efficient and environmentally-sound manner and it presents a long-term view that the other alternatives lack.

There are many good reasons to approve the proposed mine at Mount Hope.
Those who care about the environment as well as those who care about jobs can get behind this project. Thank you for allowing me to comment and please don't delay in moving forward on this mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 211

Comment 1

I support General Moly's Mt. Hope project for the jobs it will create, as well as the great economic growth for the area. I am confident that the operation will be ran with the most up to date technology. Also, General Moly has a great commitment to conduct business in an environmentally responsible way. Thank you for your time and effort in moving this project forward
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 212

Comment 1

The mining industry is one of the bright spots in an otherwise bleak economy. Please approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both. Thanks for reading my comments and please acknowledge them by supporting this EIS.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 213

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 214

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

General Moly's mine at Mount Hope will create jobs and livelihoods in a beautiful area of the country. This project deserves support for all the benefits it will provide. Thank you for letting me lend my support to it.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 215

Comment 1

I am writing your office in regards to the Eureka Moly LLC, Mt. Hope mining project. As a 20 year resident, property and small business owner in Eureka, I have and shall continue to give the Mt. Hope project my full support. This solid and well planed project will be a great benefit not just to Eureka County, but to the country as well.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 216

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced' by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 217

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

The fact that the Mount Hope project is fully financed through strategic joint venture and off-take relationships, financially-sound, and ready to go, is just one more reason the project deserves support. In these trying economic times, Nevada, and the entire country, needs to support projects that will grow our economy. General Moly is ready to get to work to do this. Let's help it put Americans back to work.

As an outdoor enthusiast I urge you to approve this project. I have seen great examples of other mining companies' commitments to be stewards of the environment. Reclamation at Mt Hope will meet standards and the Henderson Creek access road will stay open. This is a great way to meet outdoor objectives and allow this economically important project to proceed.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

As you well know, an EIS is supposed to take a "hard look at environmental consequences" and reach a decision. This draft has done exactly that, and therefore it's time to move ahead so more than 300 families can have the security of long-term, good-paying jobs.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 218

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
While we are suffering from the worst economy in decades, I believe the Mt. Hope Mine will diversify the mining industry in Nevada

and will bring the Silver State much needed economic development.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
I would like to add my name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our employees, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 219

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 220

Comment 1

The City of Elko has reviewed the Mt. Hope project's Draft Environmental Impact Statement (DEIS) and has prepared this letter of comment. The letter addresses only those areas that might impact Elko as discussed in Section 3.17, socioeconomic values. The mission statement for the City of Elko includes the term "enabling economic development". We believe it is appropriate to provide comments on this important regional project.
The City of Elko is described in this section of the draft study as "a community with potential to be a source of workers for the Project and for meeting household needs of non-local workers of the Project during both the construction and operating phases". The study also identifies Elko as a regional business center for mining-related goods and services and implies some amount of secondary employment would be realized from the project.
The DEIS estimates employment during construction will average 400 workers for 18 months. The study further estimates that most o these would be single-status daiiy an,' weekly commuters that would not reside in southern Eureka County. Table 3.17-5 lists the temporary housing resources in communities within 100 miles of the mine that could accommodate this construction labor force. Elko is the largest of these with 31 motels with 1890 rooms, and 7 RV Parks with 518 available spaces. In 2010-2011, motels and RV parks in the City housed approximately 400 construction workers from the Ruby Pipeline for over a year and City services and infrastructure

were not overly strained. Since that time, the University of Nevada Fire Science Academy, located in Carlin, Nevada, ceased operations, freeing up an additional 6,000 room nights per year. We do not see the impacts of construction labor for this project, if they choose to reside in Elko, to be significant. Our motel and RV owners and local businesses would welcome this additional business and the City would welcome the room tax revenue it generates. Elko's Park and Recreation facilities are largely funded by room tax. Other private non-profit organizations also benefit with city subsidies funded by room tax revenues.
The DEIS estimates permanent employment of 390 personnel for the first nine years of the project, of which your study assumes 55 percent to reside outside of Eureka County. Since Eureka Moly LLC (EML) currently has an office and 12 permanent employees in Elko, we assume a high percentage of these daily and weekly commuters will likely reside in Elko.
In the past three years Elko experienced significant growth in the private sector from mining and other natural resources, transportation, energy and regional warehousing. In anticipation of future growth, the City completed a major update of its Master Plan in 2011. Elko is prepared for growth. There is developable land within the City limits, ample water supply and sewage infrastructure, a class 1 Regional landfill, a regional airport serviced by daily flights, and a philosophy that welcomes planned growth, new citizens, and new businesses. Last year saw the construction of 42 single-family homes and 24 multi-family residential units completed within the City limits. The City currently has 22 single-family homes and 68 multi-family units under construction, with hundreds of multi-family units conditionally approved and pending construction. We do not see any significant impacts if some percentage of EML's work force choose to live in Elko. The sales and property taxes these new residents would add would help to mitigate the cost of additional services the City provides.
The DEIS assumes some indirect employment will be created in Elko from regional contractor purchases of goods and services. Many of these regional services are available to EML in Elko and the surrounding Industrial developments. Elko is the regional retail, industrial, transportation, entertainment, and post-secondary education hub for Northeastern Nevada. This added business will have a favorable impact on direct and indirect employment, sales and property taxes, and business fees. Elko suppliers and merchants are eager to do business with Eureka Moly, and will welcome the business their employees will bring to town. In addition, students graduating from Great Basin College will have employment opportunities at the Mine.
In summary, the City has the capacity to accommodate construction manpower associated with the Project with no required mitigation measures. With regards to longer-term housing for those permanent employees of EML who may choose to live in Elko, we are currently experiencing a shortage of residential housing. However, we believe that by the time the Mt. Hope mine ramps up to full operating employment in 2014 -2015, residential housing construction in Elko will catch up with housing demand and no mitigating measures will be required.
From an economic perspective, the Mt. Hope mile will be the first non-gold metals mine in the Region. With a 44-year project life, it will provide opportunity for much needed diversification of the regional economy.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 221

Comment 1

The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

I can't think of one good reason why this mine shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 222

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in

the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 223

Comment 1

Dig baby dig
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Letter 224

Comment 1

I write to strongly support General Moly's Mt. Hope Project. While I am somewhat concerned that water withdrawal from the two hydrographic basins may impair prior rights in the area, I believe mitigation can and will be provided by Nevada's State Engineer, General Moly, and the courts. Given that probability and expectation, I support the project moving forward for the sake of Eureka County's, Nevada's, and the company's economic prosperity.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 225

Comment 1

The Duckwater Shoshone Tribal Council supports General Moly and its effort to permit the Mt. Hope Project and bring this molybdenum mine into production. Since 2007, General Moly representatives have met with members of the Duckwater Shoshone sdfTribal Council as well as members of our Tribe in order to inform us about this project and how it will benefit our community and our region.
The heritage of the Duckwater Shoshone Tribe includes self-reliance and economic development. Indeed, the Mt. Hope Mine will diversify the economy of our region and will bring Nevada much needed economic development including job creation and tax revenue generation. Based on the job opportunities at the Mt. Hope Mine, we believe our tribal members will be encouraged to remain at the Duckwater Shoshone Reservation and will not have to move away from the Reservation to seek employment.
The Duckwater Shoshone Tribal philosophy includes stewardship of natural resources. Our project overview and update meetings with General Moly representatives have shown us that the Mt. Hope Project is an environmentally sound natural resource development project. Based on our meetings with the management of General Moly in Duckwater and tours at Mt. Hope, General Moly is committed to environmental stewardship.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 226

Comment 1

On Friday, December 2, 2011, the BLM published the Mt. Hope Project's NOA in the Federal Register, which commenced the public comment period for the DEIS. The publication of the DEIS is one of General Moly's most significant permitting accomplishments in the past five years. I have found it to be a very thorough document that represents a professional assessment of the project by a variety of experts, including scientists and engineers.
Having previously worked for 14 years in the mining industry and serving as an elected official for more than 20 years, I am in a unique position to recognize the environmental advantages of this project. I understand that no endangered species, wetlands, or Native American sites will be affected by the operation. The processing methods will not include cyanide or other toxic chemicals, and there will be minimum pit dewatering. New infrastructure will of course be required, but minimal land disturbance will be involved. Additionally, many environmental controls will be in place and closely monitored.
I am wholly-supportive of this venture, and note that General Moly is an American company controlled by a large majority of American shareholders and managed by Americans. Mining has been a mainstay of the Nevada economy and we can all benefit from good paying jobs and increased opportunities for support businesses.
I appreciate the opportunity to submit my comments on behalf of this worthy project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 227

Comment 1

I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction and begin operation.
We are suffering from the worst economy in decades. Mining is the only industry surviving. Gold won't be good forever. We need the Mt. Hope Mine to diversify the mining industry in Nevada and bring the Silver State much needed economic development.
I hope that you don't allow local government's delaying tactics to jeopardize this project. They have mineral money, now the rest of Northern Nevada could use the help.
I believe the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
This project will have a direct impact not only for our company but the State of Nevada, other mining companies/suppliers and the citizens of Northern Nevada.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in ureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 228

Comment 1

I would like to send my support for the Mt Hope project.
We in the United States must become as self sufficient as possible when it comes to natural resources.
Whether it be oil or Molybdenum we must do more to source these minerals in the US.
General Moly is going about the Mt Hope project in the most responsible way possible.
This project is adhering to all the environmental standards set by the government and will give many good people jobs for the long term in an area that they are very much needed.
The state of Nevada will collect great revenues from the project as well as the federal government.
The down line revenue stream will support many service providers and create even more needed jobs.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 229

Comment 1

This paper is a comment concerning the Mount Hope project. It is introduced with the author's view of the present social aspects of Eureka County. It then considers the possible social repercussions of the addition of the Mount Hope molybdenum mine to Eureka County. It concludes with the author's opinion of the societal implications of opening Mount Hope in Eureka Nevada.

There is a feeling in Eureka County. It is almost unexplainable, and yet it is obvious to any community member. It is, in part, the sentiment that I have when I run my daily errands. I have two young daughters; one is in the first grade, and the other I drop off at preschool every afternoon. Corbi, who is my preschooler, and I talk about who lives in the houses that we pass on our way to school. She begs me to stop at the houses of the people she is fond of, and I refuse her.

When we pass by our last "valley" house, Corbi yells hello to a horse that we affectionately call Tommy. When we finally get to school I know every child in her class, as well as every parent. I can bet on who will already be sitting there patiently, and who will be late. I truly enjoy conversing with these parents, as well as school employees. Each of my children's teachers always take the time to keep me updated on the girls' progress, and each teacher knows when I am at the school, and will come find me if either has something important to discuss.

After I drop off Corbi I usually run to the store. Almost every person I see tells me hello, and we pass a quick joke or inquiry. Even when I am in a bad mood I can't help but smile within a few moments. Although this feeling is hard to explain, I believe that it is imaginable, and I know that it is a shared feeling in the community. It is something about having a history and relationship with everyone that I see; it is some mixture of kindness, safety, and interest.

It is the knowledge of where I can let my children spend the night, and where I wouldn't feel comfortable with them staying. It is not having a doubt that even the people who don't care for me would be there for me if I needed them to be, and hoping that I am a good enough person to reciprocate. I guess that it is a familial feeling, and it is something that I consider to be invaluable. Sadly, it is something that I believe the Mount Hope project will have a negative impact on.

For centuries, communities have been founded or shaped based upon their access to natural resources and today, in our globalizing world, major natural resource developments are spreading to more remote areas. Mining operations are a good example: they have a profound impact on local communities and are often the first industry in a remote region. (IDCR, 2011, pg. 1)

Mining operations do have a huge impact on the social aspect of communities (IDCR, 2011). Most commonly, environmental and economic issues are discussed at length, and societal and cultural issues are neglected, or briefly considered. However, societal and cultural issues are of huge importance, and partake in both the environmental and economic aspects of mining.

Economy. For example, one has the ability of stating that the Mount Hope project will be an economic benefit by adding a large number of jobs, and comparing this addition to the present gold mines in Eureka County (United States Bureau of Land Management, 2011). However, the addition of such a large number of persons to the county will affect the social and cultural aspects already in place. The current gold mines in combination with agriculture presently, and stably, have the economy doing extremely well. Therefore the economic boost seen by the molybdenum mine would not be enough of a benefit to override the negative effects seen on the social and cultural aspects of the community. These affects will be seen by a larger number of persons than the benefits would be.

These negative social and cultural effects created by the addition of a large number of jobs, in view of the author, are listed as follows: a change in community feel and values, road conditions (Julien, 2008), ratio of teacher to students, rent prices and availability (Julien, 2008), and the safety of personal knowledge of individuals. These would be negatives seen by each community member. The value of Eureka County nationally as a historical area would also be diminished.

Environment. Another example is that the DEIS states that water supply could be effected by the project (United States, 2011). If this is the case, the agriculture in the community would be in turn affected, and it is important that prime agricultural land is not eaten up for mining, as both are valuable (Homer, 2010). Also, simply by affecting the agricultural aspect of the community the cultural and social aspects of the community will also be negatively affected. Although Eureka is presently a partial mining community, it is also an agricultural community. A large aspect of the culture of Eureka County is that of a farming and ranching community.

This type of background has its own set of cultural values and attitudes, as does mining. Presently, both cultures blend to create a subculture in Eureka County. However, this is a reality only because of the ratio of agricultural persons to mining persons. The change in this ratio would create a natural change in the present culture.

I will be one of the first to admit that it is important socially at times to think in a greatest good type of fashion. Yet, even in putting this project to this test I find that it would be a negative for Eureka County. Although Barrick mining is a benefit to the community, the changes created by the addition of the Mount Hope project would not by synonymous with that of Barrick, which is something I

feel is being insinuated. They are two separate entities, even in their social characteristics.

Socially and culturally, Eureka County is currently something special. The value of the community of Eureka County is something that needs to be taken into consideration. The addition of the Mount Hope project will adversely affect the community feel. Personally, I believe that this is going to be the most important affect, and should be of high regard.
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Letter 230

Comment 1

I am pleased to express my support for General Moly's Mt. Hope project and the Partial Backfill Alternative. I sincerely believe that this project can be undertaken in an environmentally responsible manner and also create quality jobs in Nevada.
The United States needs a healthy mining industry in order to sustain economic growth. The mining industry is critical to the economy and is one of the few industries that has consistently added jobs during the economic downturn. Minerals such as molybdenum are also vital to modern society. Molybdenum is necessary for the manufacture of construction products, transportation products, industrial products and electronics. It is also found in advanced green technologies such as solar panels, wind turbines, and advanced hybrid cars.
I am confident that General Moly will be a good neighbor to the town of Eureka and that they will operate the Mt. Hope mine in a professional and ethical manner. Thank you for your consideration of my position in support of the Mt. Hope Project and the Partial Backfill Alternative.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 231

Comment 1

Ames Construction, Inc. is a heavy civil, mining and industrial general contractor that has maintained a local office in Carlin, Nevada since 1999. We are a major supplier of construction services to the US mining industry. Additionally, Ames has had its Western Regional headquarters in nearby West Valley City, Utah since 1985.
We have been following the development of the Mt. Hope Project for several years and have been anxiously awaiting their receipt of a Record of Decision and subsequent authorization to proceed.
We are very familiar with the project and have reviewed the Draft Environmental Impact Statement. The involved experts for each discipline have many years of experience and extensive technical backgrounds. They have utilized applicable technical approaches with base line data. The long-term monitorinq. programs will provide early detection of changes resulting for the operations so that mitigation measures can be implemented timely to protect the environment and public. We are confident that the regulatory agencies have imposed a reasonable level of limitations in issued or to be permits. We are very confident in General Moly's financial ability and their management commitment to safety and environmental stewardship.
The design and construction of this project will provide hundreds of well-paying construction jobs for 18 months and another 400 direct long-term well-paying jobs for decades to come. These jobs represent a tremendous benefit to Eureka County, the State of Nevada, and economic benefits throughout the US as design firms are engaged and materials and equipment are purchased.
The Mt. Hope Project has our unqualified support!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 232

Comment 1

I am writing in support of the Mount Hope Project. I know many of the people who work for this company, some since grade school over 45 years ago. I know these people to be of the highest character.

I hope that these responsible hard working people would be allowed to open a mine with the approval of supervising government agencies. I would hope that General Moly has not been lured by a Government into believing that if they responsibly expend their

time, energy and wealth in a legal enterprise to open a mine, only to be stopped by an overreaching agency ,with a predetermined plan not to approve their project.

I have lived in Nevada for over 20 years. Mount Hope would be a great addition to the economic viability to the entire region. I have seen enterprises frozen out by governmental and civic organizations before and it gives a big chill to anyone considering risking resources for gain. Growth is necessary for healthy communities and regions.

Please support Northern Nevada and Provide the Approval and Support General Moly needs to make this great project a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 233

Comment 1

However, discussing the NHT (section 3.20) separately from other cultural resources (section 3.21) in the DEIS leads to some confusion. Specifically, it is unclear whether this high-potential segment of NHT is covered, along with other cultural resources, by the Programmatic Agreement (PA) between BLM and Nevada SHPO to address potential adverse effects to eligible or unevaluated sites. In the historic trails discussion on page 3- 552, the NHT is recognized as a historic property, meaning that it has been determined eligible for listing on the National Register of Historic Places. But the DEIS does not specify that the trail segment is addressed in the PA, and in fact, the PA is not mentioned at all in the historic trails section. If the NHT is covered, please reference that fact in section 3.20.
Disposition: Other (SEE RESPONSE)

Response
The Pony Express Trail is both a cultural resource and a recreation resource. As a result, this resource has its own section, separate from the other cultural resources. No changes have been made to the FEIS to address this comment.

Letter 233, Comment 2

The cultural resources section (3.21) does describe the PA, recognizes transportation and communications as a theme related to the Euro-American history of Mount Hope, and identifies the Pony Express/Overland Stage and Mail Route as a significant transportation route that passes through the project area. On page 3-567 it is reported that documented historic sites within the project area include sites related to the Overland/Road Pony Express Trail, but, the DEIS does not specify what these sites are, how many there are, or whether they were determined eligible. Is all or part of the high potential trail segment among those documented, eligible sites that will be mitigated under the terms of the PA? If not, then the decision not to address adverse effects to the trail under the PA should be explained in this section.
Disposition: Comment acknowledged; does not provide new information

Response
CC-116-Mitigation for Eligible Cultural Sites

Letter 233, Comment 3

Mitigation is briefly addressed in the historic trails discussion. A mitigation plan, endorsed by this office, has been developed to provide access through the project area for trail retracement groups — at least until the project property is sold (a Reasonably Foreseeable Future Action), at which time the plan evidently becomes null and void, access to re-riders can be denied, and direct impacts to the trail may be incurred (page 4- 67). Will these impacts be identified for mitigation when that separate undertaking comes under review?
Disposition: Comment acknowledged; does not provide new information

Response
CC-116-Mitigation for Eligible Cultural Sites

Letter 233, Comment 4

Meanwhile, in the present review, visual impacts to the historic trail's immediate setting seem to be dismissed as too severe to mitigate: "There has been no mitigation identified that could reduce the visual impact to less than significant." While it is true that nothing can be done to reduce the adverse visual effects on the trail at that location, beneficial mitigation could still be identified and carried out elsewhere along the trail resource. For example, field surveys to inventory, GPS, and evaluate trail remnants on BLM lands across Nevada appear to be a management need; maybe some of Nevada BLM's rare Pony Express station ruins could use stabilization and updated interpretation; perhaps a station site on private property might be purchased on a willing-seller basis; or perhaps some

public trail segments that are open to motor vehicle use could be signed as a local tour route. If you would like to discuss these or other ideas, please contact me directly at (801) 741-1012 ext. 118 or at Lee_Kreutzer@nps.gov.
Disposition: Other (SEE RESPONSE)

Response
CC-055-Mitigaition for Visual Impacts to Historic Trails

Letter 234

Comment 1
Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.

Mining is a tough industry fraught with uncertainty. The Mount Hope project, however, offers all the economic benefits of a long-term mine without any of the uncertainty of certain types of mining. Molybdenum is needed by the steel industry and will be for the foreseeable future. Let's give it a boost by approving this EIS.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 235

Comment 1
Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

It would be a terrible waste to not tap into this resource, a resource located right here in the U.S.A. The fact that this mine will employ hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 236

Comment 1
As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 237

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.
Any time a major company has taken the time and invested the money that General Moly has to ensure that its proposed mine at Mount Hope is environmentally-sound and eco-friendly, then I say, "Let them begin." This project puts people to work and just makes sense.
It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, its clear the BLM should approve the preferred alternative and issue a ROD.
The DEIS to evaluate General Moly's proposed Mount Hope mine is extremely thorough and demonstrates no significant impact to the environment. This project will create 400 good-paying jobs and will create additional revenue for the state of Nevada in the form of payroll taxes, mining net proceeds tax, and sales tax. This plan will be a positive economic stimulus for local businesses and other retail businesses. Please move forward with this plan in a timely manner. Ws the right thing to do.
I was going to change all this around so it looks hie I did it but the information above is so succinct all I can add as a manufacturer and supplier in Fernley employing 25 people, is that the mine employing 400 persons directly is great but the mine can and will go to creating many jobs in and around Nevada and nationwide, creating wages and with that spending money which is what we need to get the economy back on ts feet
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 238

Comment 1

In reference to the Eureka Moly, LLC proposed Mt. Hope Mine Project Draft Environmental Impact Statement.

As a 5th generation Eureka County, Nevada resident, father of 4 Eureka residents, and owner of the grocery store in Eureka I am in complete support of allowing this project go forward with no further delay. Existing mitigation within the current Draft EIS document is more than sufficient.

Please do all you can to expedite the approval of this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 239

Comment 1

I am writing on behalf of the Missoula Chapter of the Montana Mining Association to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative. Exploration and mining are basic to our industrial base, which has been on a downslide since the 1970s. The employment and economic problems of today are the result. We need to reverse this process and begin approving projects if we are ever to rebuild our economy. The Mt. Hope project is one step in that direction.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 240

Comment 1

Angelica, I am writing to you to add my support for approval of the Mt. Hope Project. I think that good jobs in a critical industry are very important, especially in this poor economy. Responsible modern mining does not resemble the careless practices of the past. Moly is necessary for the production of high quality steel including stainless steel which is a part of our lives. Jobs will be created in the building of the mine, supporting contractors will get orders, and the operators of the mine will have employment for many decades. I urge your support of the approval process. Thank you for your attention to this note.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 241

Comment 1

Let me introduce ourselves. MMI is a small company in Mesa Arizona. We concentrate on many types of mining projects, along with water, waste-water, chemical plants, etc… Our product creates a cleaner footprint in every industry we touch. It is our objective to make our product better so plants can run cleaner, more efficiently, and therefore producing a more profitable company.

Our existence depends on projects like Mount Hope. This project needs to move forward in order to produce companies like us that move forward with clean productivity.

Please push this through as it helps create steadiness in this recession for employment, both temporary and permanent work.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 242

Comment 1

I support for the Mt. Hope Mine near Eureka, Nevada. This project will bring much needed jobs, economic activity and increased tax revenues to the area, State and Nation. Natural Resources are what has made this country great and responsible use of our resources is a must in these trouble times. Eureka Moley's plan should be approved and allow real and responsible "shovel ready jobs" to start immediately.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 243

Comment 1

The City of Carlin would like to take this opportunity to comment on the Mt. Hope Mine and the positive impacts this project will have on our community, as well as Nevada. We strongly endorse the BLM's Preferred Alternative, foremost because it will promote economic development, growth and quality of life for the residents and businesses of Carlin.
Carlin is the second closest city to the Mount Hope Mine and we believe we have an opportunity to benefit from a project of this scope. The Mt. Hope Mine will bring more than 400 direct, high paying jobs to the region for more than 40 years. We also believe that a molybdenum mine will add diversity to northeastern Nevada's predominantly gold mining region. Additionally, just as with the gold mines, we anticipate that a variety of mining support businesses and industries will operate from or through Carlin, adding to the economic growth in the area.
We appreciate the BLM's work on the Environmental Impact Statement, particularly its in-depth examination of the socio-economic impacts of the Mt. Hope mine on the surrounding communities, including the potential effects on Carlin.
We concur strongly that mines and other projects should be thoroughly studied in the EIS process to ensure our region's environment

is protected while considering the socio¬economic impacts. The BLM's Draft EIS does an excellent job of addressing these issues. Therefore, the Carlin City Council supports and urges you to move forward with the BLM's Preferred Alternative for the Mt. Hope Mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 244

Comment 1

I am a local business owner and a resident of the town of Eureka in Eureka, County.
I have had the opportunity to talk with people who oppose the mine based mainly on perceived negative water impacts to Diamond Valley and the concerns of the growers. I also have talked with people supporting the mine. I have also attended County Commission meetings, General Moly's Town Hall meetings and most recently attended the BLM's public hearing at the Eureka Opera House. I understand the fear of negative impacts to Diamond Valley, but also understand that there are measures in place that will force the mine to stop mining if water impacts become evident in Diamond Valley.
As a business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to businesses when there is a pool of new or additional customers.
Our nation's economy is still struggling and our state's economy is even worse. Mt Hope Mine is planning for a 44 year mine life and will hire 400 people. Mt. Hope Mine is a molybdenum mine which will add diversity to Eureka County's mining base. All of these benefits will add up to a more stable local economy and as a local business owner and operator I would like to see this project move forward.
Mining is a critical industry in the state of Nevada and the BLM division's operating Nevada understand mining and the impacts it has on areas where mining is active. The EIS is very thorough process and I trust that your agency has examine all the impacts, negative and positive, and that your preferred alternative is well examined and the best choice for the Mount Hope Mine.
Please add my support to General Moly's Mt Hope Mine and the BLM's preferred alternative, which is similar to General Moly's proposal.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 245

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

Enough foot-dragging. Lip service only puts politicos and enviromentists to work. Its time to put the tax-paying, working man back to work.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 246

Comment 1

I am writing this letter in support of the Eureka Moly, Mount Hope Project.
Working in the capacity of a vendor and supplier to the mining industry for the past 22 years, I understand the importance of the mining industry in the Southwest.
As a former mayor (Safford, Arizona 2004 2010) I know first-hand, the importance of a mining operation of this scope to the local community in terms of jobs and the economy.
As a citizen of the United States for 66 years now, I know and understand the importance of mining to this nation. Mining is as

American as apple pie, and a vital part of this nation's strength in the world.
Here at Corrosion Engineering, we depend upon a good supply of moly for our day to day manufacturing of rubber and related products. We ship to mining and aggregate operations around the world, offsetting a portion of our national trade deficit.
I strongly urge you to approve the project without further delay and to allow the project to move forward post haste.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 247

Comment 1

I am a Nevada Resident and Employee of Aggreko LLC. I am also a member of the Nevada Mining Association. With the highest unemployment rate in this country and being a Nevada resident for many years, We are not only concerned about our State but also the welfare of our people and land. I have had extensive dealings with mining companies in the State of Nevada and can say in most cases they leave the land better than they found it. Mining is a large part of what will and does create jobs in this State. To see the reclamation efforts and attention to environmental impact that companies such as General Moly as well as Barrick and Newmont have had. It is my opinion that we are much better as citizens and communities to let these companies run these projects. I am in favor of the Mt. Hope mining Project, not only from and Environmental impact perspective but also a Financial one for the state and federal levels. Please consider this email as support not only for this project, but also for Mining in Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 248 (FORM – F1)

Comment 1

I support General Moly's plan for developing the molybdenum mine at Mt Hope Officially called the Proposed Action, this plan protects our environment and wa¬ter resources and brings greatly-needed, good-paying jobs to Nevada.
This mine will:
• Provide family wage mining jobs to the area for the next 40+ years
• Protect the surrounding environment
• Provide much-needed molybdenum to the worldwide steel industry
Support American jobs. Please move forward with
the Mt. Hope Mine
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 249 (F1) through Letter 253 (F1)

See Letter 248 for form letter text and response.

Letter 254

Comment 1

I am very concerned that the Mt Hope Project will result in degraded quality of air for residents of southern Eureka County. The DEIS on page 3-276 states, "The potential for indirect fugitive dust emissions from the ground water production exists as a result of the Proposed Action ....
Should the water table be lowered a sufficient distance, the current vegetation community in this area may shift to another community, have a lower population density (less individual plants per given area), or there may be an area without any vegetation. Should this occur and there are sufficient activities in that area to keep the soil surface from crusting, then the wind would result in the creation of wind-blown fugitive dust. These emissions would have an incremental impact on the air quality in the vicinity a/the Kobeh Valley."
The DEIS acknowledges the likelihood of wind-blown fugitive dust from the die-off of phreatophytes, but provides no evidence for the conclusion (shown above in italics) that it will have only an incremental impact on air quality "in the vicinity of Kobeh Valley."
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts toPhreatophytes

Letter 254, Comment 2

BLM should require monitoring of fugitive dust. The mine's dust control plan which only cover the mine's footprint and roads, is inadequate because it does not deal with dust resulting from die-off of phreatophytes, which is also caused by the project.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020- Impacts to Phreatophytes

Letter 254, Comment 3

Agriculture is a sustaining foundation of Eureka County's economy. I am concerned that fugitive dust generated by the plant die-off will jeopardize the high quality of agricultural products and adversely affect productive agriculture in southern Eureka County. Page 3-368 acknowledges that, "The Project mining activities and vehicular traffic would affect vegetation within the immediate vicinity of the Project Area by increasing the amount of airborne particulate deposition onto vegetation surfaces. Deposition could result in lowered primary production in plants due to reduced photosynthesis and decreased water-use efficiency." The paragraph also asserts that the wind will blow the dust off the plants, limiting the impact, and finds that the significance criteria is not exceeded. There are farms and ranches immediately downwind of the Project Area that produce high quality hay and alfalfa for their livelihood. This analysis is insufficient in disclosing the potential impacts on these agricultural products, and in concluding that the significance criteria have not been exceeded. "Periodic short-term reductions in primary production" is very significant for farmers near the Project Area.
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 254, Comment 4

BLM's cumulative impacts analysis is too narrow. There are a dozen proposed mining projects within an approximate 50 mile vicinity of the Mt. Hope project and the Town of Eureka. What is the predicted cumulative effect on air quality of those projects combined with this one?
Disposition: Other (SEE RESPONSE)

Response
CC-130- Cumulative Effects Analysis

Letter 254, Comment 5

Eureka's many assets include clear air and pristine night skies. I do not want this project to degrade our air quality. It is essential that BLM ensure that the air quality of southern Eureka County is protected and that the DEIS discloses all air quality impacts as defined by federal standards and regulations.
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 254, Comment 6

The long term future of Eureka County depends on clean air, safe drinking water, and a healthy environment. Through permit conditions and its Record of Decision, I urge BIM to take all steps possible to protect Eureka's clean and healthy air for present and future generations.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 255

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in

the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 256

Comment 1

This is Sue Orr. I just think Mount Hope is a good thing and they need to let it go through. There's plenty of water in Nevada, no sense fighting over it. Seriously. Just not above ground, that's the only thing. And if their aquifer is separate from the one that's running the farms, I say go for it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 257

Comment 1

I write in support of the proposed mine at Mt. Hope and urge the BLM to issue a favorable record of decision with respect to this project as soon as possible.

My reasoning is simple. First, Eureka needs jobs and needs a positive economic influx badly -- businesses are closing there. This mine will pay much needed taxes, will be run in a responsible manner by a highly experienced and professional team of mining engineers and executives, and will increase the pool of well paid and desperately needed jobs. In short, this mine will work a social good where such things are lacking.

Second, the environmental impact of this project has been intensely studied by dedicated and experienced government people and contractors for years. Detailed studies have been compiled, collated, and completed. These public servants have put this project to and through exhaustive testing and analysis. Indeed, even Eureka County was a cooperating agency on the review of this project. This is a "zero discharge" project with extensive mitigation procedures in place. It is time to trust the BLM scientists and to trust that their work of many years was properly performed.

This town and county need this business. This business has been extensively vetted by BLM experts. Approving this project is the right thing to do, both for the people of Eureka and for the people who devoted so much time to making sure it was done right.

Therefore, I urge the BLM to issue a favorable record of decision so that this carefully planned and vetted project can begin to confer the economic benefits the town of Eureka and the State of Nevada so badly need.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 258

Comment 1

It has come to my attention that we are in the "public comment period" on the Moly Corp Project. As a business man that supplies equipment to such projects as this, I find it hard to believe that an important, impactful project like this has taken so long to receive their permits in this unbelievably tough economic time.
I'm sure the BLM is looking closely @ the impact to the environment on such a project, which they should, but again, such a project would not impact the area in any way more than all the current mines in the area that are already in production. In fact, with the regulation becoming more protective all the time, the impact should be less. Let's face it, where this project is being proposed is not an area with any great beauty and is well suited for such a project.
During the last 3 1/2 years, the federal government has been paying great sums of money to stimulate the economy and put people to work. Here is a project that will provide great economic stimulus and provide many new high paying jobs for years to come, and the great thing is, the economic stimulation will not cost current tax payers and further generations. Doing the opposite by providing taxes paid into the federal, state & local governments.
If there were more companies willing to invest in America in this manor, we would not be in the mess we are in today as a country. This is a "no brainer" and may I, as a tax payer, encourage the BLM to quickly move forward with the final permit necessary to allow this project to start this year.

Thank you for your consideration.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 259 (F1) through Letter 262 (F1)

See Letter 248 for form letter text and response.

Letter 263

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

The Mount Hope mine will do a great deal for the economic outlook of this country. Let's get Americans back to work!
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 264

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 265

Comment 1

I have read the draft EIS and find the lack of current information on the traffic loads for highway 278 to be a problem. The numbers they cited are grossly below the actual traffic numbers that the highway currently has. They used reports from 2004 and since the increase in the price of gold last year the amount of vehicles for either mining, drilling, or contracting use on the highway as tripled.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 265, Comment 2

The effects of adding additional vehicles should be reconsidered with new numbers from the Department of Transportation and new accident statistics from the Highway Patrol.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 265, Comment 3

In Pine Valley there are a number of bus stops, slow moving vehicles, and use by ranchers to move cattle, that were not addressed as issues for traffic.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 265, Comment 4

There should be governors set on all the haul trucks at 65 mph to help deter speeding and resulting accidents.
Disposition: Other (SEE RESPONSE)

Response
The BLM does not have the authority to regulate vehicles using public roads.

Letter 265, Comment 5

Also highway 278 can be prone to deep drifiting snow, heavy flooding rains, and wildfires those issues were not addressed.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 265, Comment 6

Also the number of mule deer killed on the highway is relatively high and a report from the Department of Wildlife should be attained and taken into consideration.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 265, Comment 7

There are fifty seven residents that call Pine Valley home and highway 278 passes within feet of several of the dwellings, corrals, and fields. This road has become dangerous with all the haul trucks currently hauling ore from Ruby Hill, drillers from new mine sites and

oil exploration, and contractors that serve the mines; I am concerned that the draft EIS did not research enough of how adding more haul trucks and other vehicles will negatively affect this community.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-069-Mitigation for Impacts to Highways

Letter 265, Comment 8

The volunteer fire department has responded to over eight vehicle accidents in 2011. A huge increase from previous years and all but one were "mining" related. There should be more solutions addressed in the draft EIS besides running buses.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-069-Mitigation for Impacts to Highways

Letter 265, Comment 9

In closing I hope these concerns will be reviewed and addressed in the final EIS statement before it is approved.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 266

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 267 (F1) through Letter 272 (F1)
See Letter 248 for form letter text and response.

Letter 273

Comment 1

Provide a diversity mining in northern Nevada now dependent on Gold
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 274 (F1), Letter 275 (F1)
See Letter 248 for form letter text and response.

Letter 276

Comment 1

As a supplier of products and services to the mining industry, Gem State Paper & Supply Company is extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, we understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and bring the Silver State much needed economic development.
Unfortunately, we have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka county Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what we understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 277

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 278

Comment 1

I'm writing in support of General Moly's molybdenum mine in central Nevada. I recommend you approve the mine and move forward with the preferred alternative, which will create jobs and economic benefit for a wide region.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Even if it did

work economically (which is highly doubtful) "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

We hear a lot about the 'boom and bust' of mining, but the reality of the Mount Hope Project is that a miner could go to work on construction next year and have a job for 45 years, or even 50 years if he/she worked on post-closure reclamation. Many of us would love to have the opportunity to spend our entire career in one place. That's one more reason to open the mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 279

Comment 1

I am sending you this note to tell you that I completely support the Mount Hope Project. Please see the following reasons:

1. Jobs. This will create needed jobs in Nevada. Not only will there be jobs at the mine but it will create other jobs for support business.

2. Mining. Nevada is typically a precious metals mining state. With the addition of Moly, it will help us diversify our economy.

3. Use of federal land. The good use of federal land is imperative. This would be very good use of our federal lands.

Please make every effort to help General Moly get to production as quickly as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 280

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 281

Comment 1

There's no time like the present to approve the BLMs proposed alternative as it relates to the mine at Mount Hope. We need the economic boost this mine will provide and the steel industry needs American molybdenum.

General Moly's DEIS is thorough and deserves approval. We need to do everything we can to strengthen and grow the economy of Nevada and the west in general. This proposed mine will do just that.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 282

Comment 1

I recommend you approve the Mount Hope mine, and that it be approved as soon as possible. The preferred alternative clearly outlines a plan that works for the benefit of mining and conservation in Nevada and that will extract a commodity that is in demand by the worldwide steel market.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 283

Comment 1

As someone who treasures the natural beauty of the American west, I ask that the preferred alternative for the Mount Hope mine proposal be approved. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment.

When faced with a poor economic outlook, one must look for ways to improve the situation. General Moly's proposed mine at Mount Hope offers just such a solution and deserves approval.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 284

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

Any time a major company has taken the time and invested the money that General Moly has to ensure that it's proposed mine at Mount Hope is environmentally-sound and eco-friendly, I say, "Let them begin." This project puts people to work and just makes sense.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 285

Comment 1

The Preferred Alternative outlined in the BLM's Draft Environmental Impact Statement for the Mount Hope mine should receive support and approval. I support this plan and the many positive economic and environmental benefits it will reap.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 286

Comment 1

As a company, Wedco would like to express its support for the General Moly Mt. Hope project near Eureka, Nevada.
We are a 60+ year old electrical wholesaler with five branches in northern Nevada. We employ approximately 55 people, and a significant portion of our business is derived from servicing the mining industry.
After reading the Draft Environmental Impact Statement that covers the Mount Hope project, we believe that General Moly, the owner of the project, will prove to be a responsible operator. They are an American company and will provide jobs here at home. The jobs that will be created in what has been primarily an agricultural county will establish a wider economic base. The construction phase of the mine will stimulate commerce across the area by providing opportunities for suppliers like us and other members of the Nevada business community. Continuing mining and milling operations will result in ongoing business for years to come.
Thank you for your consideration, and we look forward to the approval of this significant prospect for economic growth in northern Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 287

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 288

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 289

Comment 1

Please move forward with Bureau of Land Management's Preferred Alternative as detailed in Chapter 2 of the Draft Environmental Impact Statement.

I particularly like the mitigation plan, which includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that. Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 290

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.
There are many good reasons to support this mine and I hope it will be approved as soon as possible.

I can't think of one good reason why this mine shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will

either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.

With the increasing worldwide demand for aircraft and renewable energy projects, the American steel industry needs a reliable and abundant source of molybdenum. As you know, molybdenum is primarily used in the steel industry to strengthen carbon and stainless steels and to reduce corrosion. It makes steel capable of handling high stress and temperatures. General Moly's Mount Hope Project has the ability to produce the molybdenum necessary to keep this industry strong and able to supply the world's need for steel.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 291

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

We hear a lot about the 'boom and bust' of mining, but the reality of the Mount Hope Project is that a miner could go to work on construction next year and have a job for 45 years, or even 50 years if he/she worked on post-closure reclamation. Many of us would love to have the opportunity to spend our entire career in one place. That's one more reason to open the mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 292

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.
In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.
Our country is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.
Any time a major company has taken the time and invested the money that General Moly has to ensure that it's proposed mine at Mount Hope is environmentally-sound and eco-friendly, I say, "Let them begin." This project puts people to work and just makes sense.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 293

Comment 1

I am writing in support of the Mount Hope Project. I believe this project can bring much needed jobs and infrastructure to Nevada in general and eastern and central Nevada in particular. This project has been well-thought out and the potential impacts identified and analyzed. General Moly, Inc. has demonstrated their commitment to the community as well as the environment.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 294

Comment 1

My name is William Assenmacher and I am the President, CEO, and owner of CAID Industries, a Tucson, Arizona company founded in 1947. CAID Industries is a metal manufacturing firm that does work for the mining industry and employs 235 people. We support Mount Hope Project for many reasons:
• Nevada is a nationally and internationally significant source of metals and minerals. Despite its long history of mining, Nevada still possesses considerable mineral reserves and its untapped geologic potential continues to make the state one of the most prospective mineral provinces in the world. Nevada's total production value if $6.26 billion (second largest in the nation after Arizona). The Mt Hope project will improve the U.S. trade balance and produce strategic minerals, which support renewable energy. The Mount Hope Project contains approximately 1.3 billion pounds of proven and probable molybdenum reserves. The project will produce 8% of the global molybdenum supply.
• The Mt Hope Mine Project is a large and exciting economic opportunity for Eureka County as well as the economic development and diversification of northern Nevada. Growth industries are vital to the future of this economy. The project will spur the development of new infrastructure, facilitate new business opportunities, and bring in new tax revenues. Mt Hope will provide millions of dollars in county, state, and national taxes, with the total expected to exceed $1.3 billion. The project will reduce the national trade deficit by about $600 million per year and create value for U.S investors.
• Nevada currently has the highest unemployment rate in the country. This project will create 400 permanent jobs. The mine life of 44 years provides socio-economic stability and a long-term revenue stream. We need to make use of the resources we have available in the U.S. to help our economy and long term jobs!
It's time for us to get behind this project and realize the benefits. Rather than sitting by and watching more jobs go overseas, let's take advantage of our natural resources!
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 295 (F1) through Letter 306 (F1)

See Letter 248 for form letter text and response.

Letter 307

Comment 1

It's with great enthusiasm that I write today in support of mining at Mount Hope. I urge approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. The country and the state need the jobs this mine will provide.

The United States has the natural resources that can help pull us out of our current economic depression. With abundant stores of molybdenum, General Moly's proposed Mount Hope mine is an example of such a resource that should be put to use in this cause.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 308

Comment 1

This is to express my support for the Mt. Hope and Liberty moly projects. The mines will provide important industrial minerals for our country, and for export. In reviewing the size and location of the projects, they will also provide a multitude of good paying, long-duration jobs for those residents seeking work, and acknowledge that there will likely be growth to the area, supporting local businesses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 309

Comment 1

I appreciate the BLM offering this opportunity to comment on General Moly's DEIS. The mine at Mt Hope will bring many good paying jobs to Nevada and will encourage the development of our natural resources nationwide, helping to lift us out of our current nationwide economic depression.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 310

Comment 1

The mining industry has supported northern Nevada for decades and with projects like Mt Hope will continue to do so in an environmental sound manner. Projects like Mt. Hope are important both to the economic viability of northern Nevada, and Nevada in general. These projects also assist the US in maintaining a domestic supply of minerals for industrial purposes. I urge the BLM to approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

The DEIS to evaluate General Moly's proposed Mount Hope mine is extremely thorough and demonstrates sound analysis of the impacts to the environment. This plan will be a positive economic stimulus for local businesses and other retail businesses. As an outdoor enthusiast and former Nevadan, I urge you to approve this project. I have seen great examples of other mining companies' commitments to be stewards of the environment. Reclamation at Mt Hope will meet all applicable. This is a great way to meet outdoor objectives and allow this economically important project to proceed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 311

Comment 1

The purpose of this communication is respond to the request made by the BLM for feedback on the Mount Hope Draft EIS. I had questions as to the reason there was a difference in the percentage of school-aged children in the projected number of students as to compared to the current percentage of students to the population of Eureka County. I spoke with the person who did the projections and I was satisfied with his procedure and calculations. Given that resolution, I am satisfied that the EIS is as accurate as can be, given the time frame (44 years) and the availability of a workforce.

I would like to make an additional comment:

When the people form the Molly Mine came to the school district to meet and introduce themselves, they asked what they could do for the District. I said start a scholarship fund and put lights on the football field. They did both. They started a scholarship foundation that is to grow to $1,000,000, and started a project to install lights on the football field. We have lights on the football field. This was a community effort spearheaded by the Molly Mine staff. This effort has been enjoyed by the school and the members of the community.

Eureka is a small community with not very much available housing. The District had a number of teachers and staff retire, but did not leave the community so there was not housing available for the new hires. I approached the administration of the Molly Mine and

asked if they would allow the teachers and staff to rent housing from the Mine. They not only allowed the teachers and staff to rent from the Mine, they allowed the employees of the County to rent as well. These are only a few examples of how the Molly Mine staff have worked to help, and be a part of the Eureka community.

It is my opinion the employees of the Molly Mine have made a strong effort to work with, and be good community members. This is a project that will help rural Nevada for many years to come. They should be approved to proceed with this project. Should you have any questions or need further clarification of anything I have said please feel free to contact me personally (775) 237-5373.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 312

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 313

Comment 1

The us economy is in trouble and creating good jobs is the solution. I am the President of a company with business operations across Nevada and I firmly support the Mount Hope project.

The Draft Environmental Impact Statement and the Preferred Alternative for General Moly's proposed molybdenum mine should be approved and the mine should be allowed to move forward. It's good for central Nevada and her neighbors.

The Mount Hope mine will do a great deal for the economic outlook of this country. Let's get Americans back to work!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 314

Comment 1

The preferred alternative as outlined in the Bureau of Land Management's DEIS for the Mt. Hope mine should be approved immediately. Any American operation that puts people back to work should be supported in these tough economic times.

Specifically, in the Great State of Nevada where we continue to lead the nation in unemployment, bankruptcy, and home foreclosures. In my travels, as an outside salesman of heavy mining equipment and truck parts, it is obvious that revenue generated from the Mt. Hope mine will have an extensively POSITVE ECONOMIC IMPACT on the entire State of Nevada.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 315

Comment 1

The Elko County Economic Diversification Authority (ECEDA) reviewed the Draft Environmental Impact Statement (DEIS) for the Mt. Hope project and submit this fetter of support for the project. This letter addresses only section 3.17 of the DEIS as it pertains to Elko County and the Cities within the county.
ECEDA is responsible for economic diversification in Elko County and each of the four cities within the county; Carlin, Elko, Wells and West Wendover. Based on the DEIS, Carlin and Elko will benefit from the Mt. Hope project in several ways. Employees that choose to live in Carlin and Elko as well as temporary workers staying in hotels, motels and RV Parks will all contribute to the economy.
Carlin and Elko are currently experiencing a shortage of residential housing. However, by the time the Mt. Hope mine ramps up the housing demand will be resolved and no mitigation will be required. Carlin is currently negotiating with two developers to build multifamily and single family homes in Carlin. The proposed timeline for development would make additional housing available at about the time it would be needed for the Mt. Hope project. Elko is also in progress with several developers to provide additional multifamily and single family housing with one multifamily project of about 200 units underway at this time.
With the demand for skilled workers in the mining industry, ECEDA teamed with GBC and the Elko County School District to focus on providing permanent long term solutions to our workforce needs. The Dream it — Do it program will train students starting in high school and provide career pathways as well as certifications for our youth to pursue various careers with local mining companies. The program includes marketing so that students and parents are educated on the availability of careers in their community. GBC currently provides training to 100 students each semester for various jobs in mining. We plan to expand the courses available as well as increase the number of students receiving training.

The Mt. Hope project is a great diversification and addition for our mining support companies as well. Hundreds of companies have invested in Elko County and additional mining will provide sustainability and growth for these companies.
ECEDA sees the Mt. Hope project as a good addition, not only to housing and temporary lodging but also for retail. We also believe that the Mt. Hope project provides much needed diversification from our gold mines. Although still mining, it is a mineral and therefore driven by different factors than gold. We fully support the Mt. Hope project and believe that it provides a very beneficial economic impact not only to Elko County but to all of the Northeastern Mining Region. We also believe that the County, Carlin and Elko can meet the demand of the Mt. Hope project with no mitigating measures required.
This letter of support was approved by ECEDA's Board of Directors and Executive Committee at their February 22, 2012 meeting.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 316

Comment 1

Like the rest of the nation, Nevada is suffering economically. I wish to voice my support for the proposed mine at Mt Hope because I would like to see more projects like this be successful so that our economy can benefit.

Any alternative that seeks to delay or hinder in any way the successful development of the molybdenum mine at Mount Hope is an alternative that should be swiftly rejected. We need to put Americans back to work and we can do this by supporting General Moly's Proposed Alternative because it will open mining operations within 18 months of approval and put to work nearly 400 people. It's a good project for Nevada and a good project for the lucrative future of mining in the United States and will give a real boost to our economy.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been

carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.
This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 317

Comment 1

The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 318 (F1) through Letter 326 (F1)
See Letter 248 for form letter text and response.

Letter 327

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact. the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project Indeed, such nonsensical actions by a – government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 328

Comment 1

My parents own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time our family has learned a lot about the Mt Hope molybdenum mine.
As a future 2"d generation business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers. I have enjoyed doing business with General Molly during the past two years or so.
It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses. It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community. I know General Moly will make a positive contribution in Eureka on behalf of my generation for many years.
Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to Eureka County. All of these benefits will add up to a more stable local economy and as a future business owner and operator I would like to see this project move forward.
Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 329

Comment 1

My family and I own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time I have heard and learned a lot about the Mt Hope molybdenum mine.
I have had the opportunity to talk with people who oppose the mine based mainly on perceived negative water impacts to Diamond Valley and the concerns of the growers. I have talked with people supporting the mine. I have also attended County Commission meetings and General Moly's Town Hall meetings. I understand the fear of negative impacts to Diamond Valley, but also understand that there are measures in place that will force the mine to stop mining if water impacts become evident in Diamond Valley.
As a business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers.
It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community.
Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to Eureka County. All of these benefits will add up to a more stable local economy and as a local business owner and operator I would like to see this project move forward.
Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 330

Comment 1

My parents own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time our family has learned a lot about the Mt Hope molybdenum mine.
As a future 2"d generation business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers. I have enjoyed doing business with General Molly during the past two years or so.
It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses. It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community. I know General Moly will make a positive contribution in Eureka on behalf of my generation for many years.
Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to

Eureka County. All of these benefits will add up to a more stable local economy and as a future business owner and operator I would like to see this project move forward.
Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 331

Comment 1

My husband and I own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time I have heard and learned a lot about the Mt Hope molybdenum mine.
I have had the opportunity to talk with people who oppose the mine based mainly on perceived negative water impacts to Diamond Valley and the concerns of the growers. I have talked with people supporting the mine.
As a business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers. I have enjoyed doing business with General Molly during the past two years or so.
It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community. General Moly has done an excellent job in keeping the local business owners informed of project updates.
Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to Eureka County. All of these benefits will add up to a more stable local economy and as a local business owner and operator I would like to see this project move forward.
Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 332 (F1) through Letter 335 (F1)
See Letter 248 for form letter text and response.

Letter 336

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 337

Comment 1

Please approve the proposed Mt. Hope molybdenum mine by supporting the preferred alternative. This is an excellent project and one that will bring broad-ranging economic benefits to Nevada and to the national economic outlook for years to come.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 338

Comment 1

Our economy, our Country and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

Nevada needs jobs, our Country needs to compete with other Countries that will bury our economy if we tie ours up with red tape!
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 339

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

Any time a major company has taken the time and invested the money that General Moly has to ensure that it's proposed mine at Mount Hope is environmentally-sound and eco-friendly, I say, "Let them begin." This project puts people to work and just makes sense.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 340

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.

I believe that any mining company that is working in todays environment is so much more environmentally consciuos that the average "envronmentalist"
It is ridiculous. These companies are under very heavy restrictions and only the companies that are doing it for the right reason are willing to risk the kind of money needed to start a new mine.

I attended an open comments meeting the U.S. Forest Service had about the Rosemont Mine in Southern Arizona and the best arguments that those against the mine had were that a desert tortois was seen in the area (they are all over the Sonoran Desert) and that crack houses use metal so we should not mine metal any more.

The reasons for the mine were vast and included, jobs in a depressed area and economy, jobs in an area with double digit unemployment, jobs in an area with mostly service workers that get paid just above minimum wage.
The stewardship of the environment and the community activism were also talked about. The sponsoring of baseball teams to local events.

All of this added up to a "NO BRAINER"
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 341

Comment 1

I'm writing in support of General Moly's molybdenum mine in central Nevada. I recommend you approve the mine and move forward with the preferred alternative, which will create jobs and economic benefit for a wide region.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Even if it did work economically (which is highly doubtful) "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 342

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine.

By tapping into our abundant natural resources here at home, our economic outlook could be vastly improved. As an American

company, run by American management and a majority of American shareholders, General Moly's Mount Hope project will contribute greatly to our economy.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Even if it did work economically (which is highly doubtful) "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 343

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 344

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 345

Comment 1

Americans urgently need jobs. The project at Mount Hope will provide them. Please approve the preferred alternative as proposed in the Draft Environmental Impact Statement and help get Americans back to work.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 346

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

Mining is a tough industry fraught with uncertainty. The Mount Hope project, however, offers all the economic benefits of a long-term mine without any of the uncertainty of certain types of mining. Molybdenum is needed by the steel industry and will be for the foreseeable future. Let's give it a boost by approving this EIS.

The BLM has spent a lot of time and effort looking at the water use for this project and a large part of the EIS talks about water use. But in Nevada, you can use water that you own and water rights can be bought and sold. As I understand it, the mine bought the water rights for the Mt Hope Project and the BLM doesn't even regulate groundwater use. The BLM should conclude that there are no "impacts" to water quantity, because the mine will just be using water that they own.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 347

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine.

By tapping into our abundant natural resources here at home, our economic outlook could be vastly improved. As an American company, run by American management and a majority of American shareholders, General Moly's Mount Hope project will contribute greatly to our economy.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 348

Comment 1

I support American jobs and the proposed mine at Mount Hope will create much needed employment for nearly 400 Americans. Please include my comments as part of the public response to General Moly's plan and please support the Preferred Alternative.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.

General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 349

Comment 1
I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 350

Comment 1
I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 351

Comment 1
Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Mining is a tough industry fraught with uncertainty. The Mount Hope project, however, offers all the economic benefits of a long-term mine without any of the uncertainty of certain types of mining. Molybdenum is needed by the steel industry and will be for the foreseeable future. Let's give it a boost by approving this EIS.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Even if it did work economically (which is highly doubtful) "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 352

Comment 1

Please approve the preferred alternative as outlined in the Draft Environmental Impact Statement for General Moly's Mt Hope mine.

General Moly is creating American jobs and boosting the economy of the State of Nevada at a time when many around the nation are suffering from lack of work. Not only will General Moly's Mount Hope Project improve the economic well-being of the area immediately surrounding it, but will also do a great deal to improve our economic well-being nationally. This mine will reduce the national trade deficit by around $600 million annually and generate $50 million per year in Federal, State, and local taxes.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 353

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 354

Comment 1

I fully support this project and the Preferred Alternative as outlined in the DEIS.

The study done to evaluate potential impacts from the project shows there won't be any significant impacts to Diamond Valley, which is the main competing use for water in the area. Over 5 years of studies have been done. It's time to make the decision and move forward.

Mt. Hope Mine is a major component to economic recovery in mining projects.

Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

Let approve the EIS and move forward and increase the economic welfare of Eureka County.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 355

Comment 1

Please include my comments as part of the public response to the proposed molybdenum mine at Mount Hope. This project should move forward without delay.

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 356

Comment 1

The mining industry is one of the bright spots in an otherwise bleak economy. Please approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 357

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.
General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 358

Comment 1

I would like to add my support to the BLMs public comment period for the proposed mine at Mount Hope and ask that the preferred alternative receive approval.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 359

Comment 1

There are continuing concerns about the cumulative visual impacts to public lands users' experiences from certain activities (temporary and permanent). Some notable activities include proliferation of new roads, poorly-sited and designed structures, lack of co-location of infrastructure and improper lighting, to name a few.
Cumulative visual impacts to public lands users' experiences should be considered.
Disposition: Other (SEE RESPONSE)

Response
Chapter 4 of the DEIS discloses the potential cumulative impacts associated with the proposed Project. No changes to the text of the FEIS have been made to address this comment.

Letter 359, Comment 2

The following language is suggested that should be provided up front to applicants who propose development on public lands that includes lighting:

Utilize appropriate lighting:

♣ Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices.

♣ Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas.

♣ A lighting plan should be submitted indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan.

♣ Any required FAA lighting is exempt from this condition, but should be consolidated and minimized wherever possible.

In addition, the following mitigation measures should be employed.

Utilize building materials, colors and site placement that are compatible with the natural environment:

♣ Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible. Proliferation of new roads should be avoided.

♣ For example, the use of compatible paint colors on structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment improve the user experience for others who might have different values than what is fostered by built environment activities.

♣ Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications
Disposition: Analysis modified (SEE RESPONSE)

Response

Although the requested lighting measures are applicable to many facilities and operations on public lands, mining safety dictates that some of these measures cannot be adopted. Lighting is essential in areas where employees are expected to be working. This includes the process and active mining areas, and by providing adequate light to protect worker safety, some light may be visible from adjacent lands. However, EML has reviewed the Project design and will accommodate the requested measures where possible. The following language has been added to the EIS in Section 2.1.14, "In the process, maintenance, warehouse, laboratory and administration areas, lighting will have screens to prevent the bulb from shining up or out, and would be located to avoid light shining onto adjacent lands as viewed from a distance. Within these areas lighting fixtures would be hooded and shielded, face downward, be located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas. Buildings would be painted in earthtones so they are compatible with the natural environment."

Letter 360

Comment 1

Choose the NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 360, Comment 2

Do one foot and five foot water drawdown maps for this project
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 360, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving natural ecological balance
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 360, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 361

Comment 1

1) Choose the NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 361, Comment 2

2) Do one foot and five foot water drawdown maps for this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 361, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 361, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (hoses have "not natural predators"), less than a page long and did not specifically address wild horses in nearby areas.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-079-Wild Horse Predators

Letter 362

Comment 1

Please leave the mustangs alone, nature can manage itself.
Henry David Thoreau said: In wildness is the preservation of the world.
By removing the wild from the west, you destroy the west.
Your own Don Glenn stated with a slide show in Reno that the mustangs were impossible to count.
How can you have a management plan based on numbers that are impossible to count?
And as far as the mustangs having no natural enemies, ummm, don't we all?
Please let them just be, preserve our freedoms,
As America is meant to be
Disposition: Other (SEE RESPONSE)

Response
The comment is beyond the scope of this EIS.

Letter 363

Comment 1

There will be impacts on privately-held water rights that have been established for many years, such as Henderson Creek, Robert's Creek, Nickel Springs, and Diamond Valley, among others. My concern is that the proposed mitigation for Robert's Creek Spring and Henderson Creek Spring (page 3-97) is flawed. Specifically, the mitigation proposes to pipe a maximum of 9000 gpm to these two springs for 3 months. Where is the mine getting that water? In both of these in-stances the mitigation will take water that has not been accounted for in the DEIS. The mine's consumptive use will consume all the 11,300 acre feet per year ground-water under appropriation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 363, Comment 2

In addition, the water used for The Henderson Creek mitigation is pumped from Kobeh Valley, which would amount to an inter-basin transfer.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 363, Comment 3

The whole hydrological plan for the operation of this Mine depicted in this DEIS is based on an inter-basin transfer of water. The Kobeh Valley water is used beneficially in the facilities located in the Diamond Valley Hydrographic Basin to concentrate the ore.

Nevada Water Law says: In determining whether an application for an interbasin transfer of water should be approved or rejected, under NRS 533.370 the State Engineer must consider:
Whether the applicant has justified the need to import the water from another basin.
Whether a conservation plan has been adopted and is being effec-tively carried out, if the State Engineer determines that such a plan is advisable for the basin into which water is to be imported.
Whether the proposed action is environmentally sound as is relates to the basin from which the water is exported.
Whether the proposed action is an appropriate long-term use that will not unduly limit the future growth and development in the basin from which the water is exported.
Any other factor(s) the Office of the State Engineer determines to be relevant.
The applicant may also work with the county from which the water is proposed to be transferred to develop a plan to mitigate adverse eco-nomic impacts of the transfer. If a plan cannot be agreed to, the county (with the approval of the State Engineer) has the option to impose an annual fee on the water transferred. The amount of the fee is defined in NRS 533.438. None of these laws have been adhered to.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 363, Comment 4

Examples are as follows:

Pg 2-18 2.1.2.2 Mine Dewatering: ------ Approximately 20% of the pit dewatering water would come from Kobeh Valley and 80% of the pit dewatering would come from Diamond Valley, which is proportionally based on the configuration of the open pit relative to the basin divide and the local geology. This states that approximately 80% of the pit and the mining will take place within the Diamond Valley Hydrographic Basin boundary.

PG 3-41 Figure 3.2.10 Depicts the majority of the pit is in the Diamond Valley Hy-drographic Basin.

Pg3-79 Figure 3.2.18 Depicts the majority of the pit lake drawdown is in the Dia-mond Valley Hydrographic Basin.

Pg 2.21 Figure 2.1.8 Depicts the location of the processing and milling facilities within the Diamond Valley Hydrographic Basin.

Pg 2-13 and, 2-14 Figure 2.1.5 and Figure 2.1.6 These two figures show that at some point in time that the non-PAG waste rock storage area will effectively change the division of the Hydrographic Basins, placing the mine completely within the drainage of the Diamond Valley Hydrographic Basin.

I Believe the Processing and Milling Facilities where the concentration of the ore takes place is the place of beneficial use of the water.

Pg 2-3 figure 2.1.5 Shows the location of the tailing storage facilities. The deposition of all remaining water will be trapped in the tailings, or evaporated into the air from the tailings. This disposal of water by isolation from the aquifer or evaporation is consumptive.

The fact that the water is in solution with the tailings and transfered back across the Hydrographic boundary is just a shell game. It is either isolated from the Kobeh Valley aquifer and trapped in the tailings or evaporated into the air.

The fact that the water does not return to any basin in my opinion is equivalent to a "Takings".
Disposition: Comment acknowledged; does not provide new information

Letter 363, Comment 5

The DEIS is flawed because it does not address any alternative action to the pumping from Kobeh Valley.

BLM NEPA Hand book (H-1790-1) The EIS must "rigorously explore and ob-jectively evaluate all reasonable alternatives" (40 CFR 1502.14(a) and NEPA Sec. 102(2)(C)(iii) and "study, develop,and describe appropriate alternatives to recom-mended courses if action in any proposal that involves unresolved conflicts concerning alternative uses of available resources" (NEPA Sec. 102(2)(E)).
Disposition: Comment acknowledged; does not provide new information

Response
CC-029-Roberts Creek Recreation Data

Letter 363, Comment 6

BLM's National Policy Act Hand book states all "relevant, reasonable, mitigation measures that could improve the project are to be identified even if they are outside the jurisdiction of the agency"(BLM, 2008. H-1790-1)
Disposition: Other (SEE RESPONSE)

Response
The section of the BLM NEPA Handbook that is quoted is from the CEQ 40 Questions - Question 19b. The response to Question 19b further elaborates by stating "… outside the jurisdiction of the lead agency or the cooperating agencies, thus would not be committed as part of the RODs of these agencies. ... This will serve to ... alert agencies or officals who can implement these extra measures, and will encourge them to do so." This text implies that any mitigiation measures outside the BLM's jurisdiction to be discussed in the EIS needs to be ones that another agency has the authority to implement. The text is not indicating all mitigation measures are to be discussed regardless of their implementability. Text has been added to Section 3.26 of the EIS that discusses those mitigation measures that outside of the BLM's jurisdication, but may be implemented by other regulatory bodies. The NDWR has the ability to mitigate impacts to water rights. The text under Section 3.2.3.3 of the EIS discusses the NDWR jurisdiction for water rights.

Letter 363, Comment 7

I propose that there is an alternative to the Proposed Action that is not addressed in the DEIS. If this mine had chosen to purchase 22,600 acre-feet per year from private holders in Diamond Valley in return for pumping 11,300 af/yr. from the Diamond Valley Hydrographic Basin, it would have eliminated the vast majority of environmental impacts related to this project. The additional 11,300 af/yr. would help alleviate the current over-drafting of the entirety of The Diamond Valley Flow System. (Inset map on Figure 3.2.3 upper right corner)

The impacts, as currently described in the Proposed Action, will have to be addressed in an ongoing manner for hundreds of years.

Many major mining companies operating in Nevada have purchased private water for their projects proving that this alternative does not set a precedent.

I think history will show that we have missed the mark and lost a real oppor-tunity to make a positive difference on the impact to the environment. We could re-duce the impact on 150,000 acres of wildlife habitat, which includes all of the Rob-ert's Mountain.

The vast majority of the impacts to springs seeps and wells, multiple hun-dreds of acres of riparian, and pasture lands associated with many historic, sustain-able ranching operations would not be impacted.

With cooperation from private enterprise, the mining interest , Feder-al,state,and local government, the one potentially renewable resources we have, WATER, would remain renewable so, even after the mineral deposits are depleted.
Disposition: Comment acknowledged; does not provide new information

Response
CC-071-Alternatives to Water Use

Letter 363, Comment 8

I believe that the state and the BLM Needs to quit treating the state's water as a finite resource. It is important to work to preserve a Renewable Water Supply for southern Eureka County. That to me is the most important issue surrounding this DEIS.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 364

Comment 1

I support American jobs in the mining industry and ask that General Moly be approved in moving forward with the proposed action as outlined in the BLMs Draft Environmental Impact Statement.

Mining projects hold real potential for turning our dismal economy around.
People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.

This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

This plan will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental protections are put in place. This is what Nevada and the nation needs in our present economy.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 365

Comment 1

It's with great enthusiasm that I write today in support of mining at Mount Hope. I urge approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. We need the jobs this mine will provide.

The Mount Hope project is ready to go and should be approved immediately.
General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.
This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 366

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 367

Comment 1

Broadbent & Associates, Inc. is submitting this letter to express our support for the proposed Mt. Hope project as outlined within the Draft Environmental Impact Statement (DEIS). In our opinion, throughout development of the DEIS, Eureka Moly is demonstrating responsible stewardship of the land. Additionally, we feel that the increased employment opportunities within Eureka County as a result of this project make it a worthwhile venture, especially when considering the responsible nature Eureka Moly has demonstrated in the DEIS.
With regard to groundwater quality, it has been our experience that the quality of water discharged from modern mining operations is far superior to that of historical mining operations. Regarding the Mt Hope project, it is our understanding that the proposed mine site will include open pit mining (and a future pit lake) and both non-acid generating and potentially acid generating waste rock piles. However, based upon the DEIS, it is our opinion that concerns relative to these operational features are being adequately addressed so as to minimize potential impacts to current and future groundwater quality.

In summary and based upon our review of the proposed Mt. Hope Mine, it appears to us to be a worthwhile project, particularly when considering the care demonstrated by Eureka Moly in preparing the DEIS, the results of the study, and the overall economic benefit of the project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 368

Comment 1

Do you have the assurance the Molybdenum mine project for Mt. Hope has all its dollars and cents to complete the project? It would not enhance the landscape of southern Eureka County to have an open pit with no vegetation which was only partially backfilled. Remember they left the canyon north of Eureka (the town) torn up, and a mess was dumped on the taxpayers.
Disposition: Other (SEE RESPONSE)

Response
CC-117-Reclamation after Project Completion

Letter 368, Comment 2

3.9.3.4 states the No Action Alternative that the area would remain available for future mineral development, or for other purposes as approved by BLM. If that be the case, we need to think of an American Company, where American financial companies keep our resources here in the U. S. A. A foreign company, with foreign financing and our natural resources shipped, leaves us deplete of our natural resources only to cost us money to bring back much needed hardened metals for our own use.
Disposition: Other (SEE RESPONSE)

Response
Comment noted.

Letter 368, Comment 3

Another concern I have is that moly is essential for the proper development of plants. The paintbrush is about to be listed on the BLM SSS list and that is a plant that is prevalent in the Mt. Hope region. The BLM has the authority to protect all flora and fauna and to prevent undue degradation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-070-Special Status Species Mitigation

Letter 368, Comment 4

Another concern is air quality. Anyone that has lived in southern Eureka County knows the prevailing winds are from west to east. With mining disruption to the west of us, what is that going to do for the air we breathe and for further dust on our crops?
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 368, Comment 5

Most of us won't be around in forty to fifty years, but it is our legacy to maintain and keep a safe environment for our children and our grandchildren. We hope to provide the same opportunities to farm and raise livestock that we have been afforded.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 369

Comment 1

Eureka was initially developed by mining in the 1800's, but has been sustained over the years by agriculture and its strong tax base. I am a fifth generation farmer/rancher in southern Eureka County. My family has always raised cattle and our hay crops initially were limited to irrigated hay meadows and our cattle watered on developed springs and creeks. Mt Hope certainly is a concern because at

one time we lived in Kobeh Valley, and we used the waters of Monitor, Antelope, and Kobeh Valley before we moved to Diamond Valley. We know that the drainage waters of those valleys flow toward Diamond Valley due to the elevation of those areas. Mount Hope claims that the water will be chiefly derived from Kobeh Valley and it will not affect Diamond Valley water. How can this be so if the drainage water goes toward and arrives in Diamond Valley?
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Lette 369, Comment 2

Air quality control is a concern. Without clean air to breathe, with dust churning through the air, what effect might this have on us personally and our livestock, as well? Since our crops are delivered around the world, what kinds of dust will the crops be carrying with them as they travel?
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 369, Comment 3

Mt. Hope talks about job creation. If our air quality in Diamond Valley is bad and there is no water for irrigation, that leaves more than four hundred employers and employees unemployed, sick from breathing dust and the people of the area may eventually be on food stamps. Our livelihood would be taken.
Disposition: Already addressed in planning documents

Response
CC-065-Socioeconomic Impacts from the Project

Letter 369, Comment 4

Mt. Hope is threatening the economic stability of a renowned agricultural area in southern Eureka County. It has sustained our county during the lean years because of its tax base. What of all the tax breaks that area mines get?
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 370

Comment 1

How many AUM's are going to be affected? What effect will it have into the future?
Disposition: Other (SEE RESPONSE)

Response
Section 3.13.3.3 of the EIS discloses the AUMs expected to be impacted from the Project.

Lette 370, Comment 2

Do you have the assurance the financial resources are in place for a full completion of the project, or are they going to leave a scarred mountain side and then vanish? That would create a dust hazard forever. After all, they left the canyon north of Eureka a mess.
Disposition: Other (SEE RESPONSE)

Response
CC-117-Reclamation after Project Completion

Letter 370, Comment 3

What about emissions and poor air quality? That would affect our personal ability to breathe along with covering our soils with heavy metals. This would not only affect Diamond Valley, but for a radius of many miles around.
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 370, Comment 4

Mt. Hope talks about the jobs they will create, but if it creates water and soil issues for all concerned that would leave four hundred or more people of Diamond Valley unemployed, penniless, and on food stamps. Please also remember that Diamond Valley agriculture also stimulates the economy and supports the food availability in the U. S.
Disposition: Already addressed in planning documents

Response

CC-065-Socioeconomic Impacts from the Project

Letter 370, Comment 5

With the entire disturbance it will destroy the Pony Express trail and certainly Pony Express is very historic.
Disposition: Other (SEE RESPONSE)

Response

As described in Chapter 2 of the EIS, the Pony Express Trail is avoided by essentially all the Project-related surface disturbing activities. See Section 2.1 of the EIS. No changes to the FEIS have been made to address this comment.

Letter 370, Comment 6

During the early 1900's many Indians lived in the Mount Hope area during their migrations from north to south and back again. I'm sure there are Indian artifacts in areas around Mount Hope.
Disposition: Other (SEE RESPONSE)

Response

The Project Area has been fully surveyed for cultural resources and those discovered resources are addressed in the EIS. No changes to the FEIS have been made to address this comment.

Letter 371 (F1) through Letter 383 (F1)

See Letter 248 for form letter text and response.

Letter 384

Comment 1

Because Diamond Valley is already over adjudicated in water rights and is also inclined to be of an arid climate, the Mt. Hope Project can, and will, have a negative impact on the water table in Diamond Valley and the farming industry in Diamond Valley. It also has the potential to have a negative impact on many of the springs surrounding Diamond Valley.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 384, Comment 2

The DEIS ignores the inconsistencies and conflicts with the plans, goals and policies outlined in Eureka County's Master Plan and does not address how these conflicts will be mitigated.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-025-Eureka County Plan Consistency

Letter 384, Comment 3

The DEIS has little information on the high environmental values, fisheries and recreational opportunities on the Roberts Mountain area including Roberts Creek.
Disposition: Comment acknowledged; does not provide new information

Response

CC-029-Roberts Creek Recreation Data

Letter 384, Comment 4

In the latest version of the DEIS, the BLM states that recreational opportunities in the Roberts Mountain area will be lost. This tells me that the water will be drying up due to the pumping of water for the Mt. Hope Project. The loss of these creeks, seeps and wet meadows will have a devastating effect on the fisheries, wildlife habitat and the candidate endangered species
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 384, Comment 5

It seems that there is a double standard here; it has been proposed by the BLM that the livestock operators in that area should move their cattle out during the hot season and that the meadows should be grazed no less than a six or eight inch stubble height in order to protect the Sage Grouse, yet the Mt. Hope Project will have extreme negative consequences to the Sage Grouse habitat and natural resources and the Sage Grouse will be long gone after the water dries up.
Disposition: Already addressed in planning documents

Response

Impacts to greater sage-grouse are addressed in Section 3.23.3 of the EIS. Mitigation for greater sage-grouse is incorporated into Section 3.23.3 and is outlined in Appendix D of the EIS. No change has been made to the EIS in response to this comment.

Letter 384, Comment 6

Although there are some mitigation measures suggested throughout the DEIS document, these mitigation measures do not come anywhere close to replacing the existing natural habitat that exists in the Roberts Mountain area and Roberts Creek.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 384, Comment 7

The DEIS tends to downplay the potential impacts on the surface water resources in general, and the decreed surface water rights in Henderson Creek even though these water rights are adjudicated under court decree and no reduction of flow caused by other ground water extractions is allowed under the decree.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 384, Comment 8

In conclusion, the Mt. Hope Project is a huge project and the economic benefits to the local businesses and Eureka County may also be huge. But, the farming industry, the existing environmental values, the existing natural resources, and existing prior rights should not be ignored despite the benefits.
Disposition: Already addressed in planning documents

Response

CC-067-Socioeconomic Impacts

Letter 385

Comment 1

I urge the BLM to take the NO ACTION ALTERNATIVE in connection with the Mount Hope Project as described in ES-2 to ES-3 in Volume 1 of the Mount Hope Project DEIS.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 385, Comment 2

In the 3 paragraphs (out of 2 huge volumes of data) that the BLM has allotted for the Purpose and Need for the Action of the Mount Hope Project, the DEIS states "The need for the action is established by the BLM's responsibilities under the FLPMA to respond to a request for a Plan of Operations for the applicant to exercise their rights under the General Mining Law."

Okay, you responded to the request. This doesn't mean you have the responsibility to approve the request. Also, responding to a request does not establish the "need" for this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-109-Purpose and Need

Letter 385, Comment 3

FLPMA (The Federal Land Policy and Management Act of 1976) policy directs that BLM manage our lands so they "best meet the present and future needs of the American people" and take into account "the long-term needs of future generations for renewable and non renewable resources…" In this DEIS the BLM does NOT establish the need for this action, which RENDERS MOOT all of the maps and analyses contained in this DEIS.
Disposition: Other (SEE RESPONSE)

Response
CC-111-FLPMA Compliance

Letter 385, Comment 4

FLPMA policy directs the use of land and resources that best meet the "needs of the American people." Not the needs of the Chinese. Not the needs of people of other countries. Mt. Hope contains America's largest and highest grade undeveloped molybdenum. Molybdenum is called the metal of the 21st century, and is so crucial that China declared it a strategic metal. As you must know, a bank fully owned by the government of China, the Export-Import Bank of China (China Eximbank) loaned money to Sichuan Hanlong Group, and the money was passed to their subsidiary, Hanlong USA Mining for the Mount Hope Project.

In 1872, when the General Mining Law took effect, China didn't own $1.1 trillion of United States bonds, bills and notes. China wasn't the world's second largest economy. China wasn't one of the biggest threats to the U.S. (National Intelligence Director James Clapper has stated China is now). If the BLM approves this project, the BLM will be allowing a limited and valuable resource, a strategic metal, to go to China, giving this foreign country even more power (at the very least, economic and technological advantage).

China is saving its own molybdenum supply and controlling prices of it by limiting exports of it, so it seems like China is driving the supply and demand.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 385, Comment 5

The DEIS also states "The project need is to meet the prevailing market demand for molybdenum (Mo)." What is driving this prevailing market demand? China. China will use the Mt. Hope molybdenum to make steel for its rapidly growing infrastructure (low end social housing, which is creating "ghost cities") and to sell to other countries. China needs molybdenum for about 26 new nuclear reactors it is building. (Considering the nuclear disaster at Fukushima, it seems this may not meet the future needs of any people.)

If China uses the largest and highest grade U.S. molybdenum resource, while saving their own supply, what country will have molybdenum in the end? And, more importantly to us, what country isn't going to have any molybdenum left?

Please answer this question when responding to my comment:
How does BLM approval of the sale of valuable U.S. resources to a foreign country best meet the present and future needs of the American people?
Disposition: Comment acknowledged; does not provide new information

Response
The Proposed Action is allowed under FLPMA. Most of this comment is outside the scope of the EIS.

Letter 385, Comment 6

Agriculture is the backbone of our country. This project will have a huge impact on your friends and neighbors who are farmers and ranchers. Many of these families have been stewards of the land for generations. Will there be water to sustain agriculture in this area in fifty years?
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Letter 385, Comment 7

The BLM has a lot of pretty 4 color detailed maps in this DEIS, but NOT ONE 1' or 5' water drawdown map. By not including a 1' or 5' water drawdown map, the BLM has willfully minimized the impact of water use by the mine, which could adversely affect agriculture (and wildlife). The BLM has deceived the American public by omitting this. This willful deception is not meeting the present and future needs of the American people and is in violation of FLPMA.

At the hearings at the Nevada Division of Water Resources, one General Moly Executive stated that BLM told them to only do 10' water drawdown maps. Since they don't take long to do, and don't cost too much, what was BLM's reason for this direction?
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 385, Comment 8

On ES-10, the BLM states their preferred alternative is the approval of this project to "best fulfill the agency's statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors." This might make the American people wonder if BLM's mission and responsibility is mismanagement and lack of foresight that will run America into the ground.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 385, Comment 9

BLM's DEIS states that if Eureka Moly doesn't mine this area, the area will remain available for future mineral development. Well, what about this? I think BLM needs to consider that if an American company mines molybdenum for use in America, the mining use might better align itself with FLPMA and the present and future needs of the American people.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 385, Comment 10

As for 3.13 of the DEIS, regarding Wild Horses (page 3-407), this page was generic, vague and contains incorrect information (for example, that wild horses "have no natural predators"). This DEIS does not give any specific, detailed information about wild horses in the area (how many?), or nearby HMAs (how many?) or how a 1' water drawdown could dry up streams and affect the wild horses. Less water also means less forage.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 385, Comment 11

I am also including the 3 articles below, which I wrote, as part of my reasoning as to why the Mt. Hope Project will NOT meet the present and future needs of the American people (in connection with 1.4, Purpose and Need for the Action, of the DEIS).
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 385, Comment 12

In conclusion, the BLM has NOT PROVED the "need for this action" in this DEIS, and if the BLM approves the Mount Hope Project, the BLM will be in violation of FLPMA.
Disposition: Other (SEE RESPONSE)

Response

CC-111-FLPMA Compliance

Letter 386

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 386, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 386, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 387

Comment 1

I am writing in support of General Moly's Mount Hope project that is under review. While mining is certainly damaging to the environment, it is essential to the way we live. Technology is not possible without minerals, and minerals have to come from the ground.

It is our responsibility in the mining industry to minimize the impact of extracting the products that society needs; unfortunately there is an unavoidable trade-off between limited environmental damage and living in a technological age. Everyone knowingly or unwittingly accepts the trade-off every time a product is purchased or the lights are turned on. The most ardent mining opponent in America owns a lot of rock in tailings impoundments around the world. Electricity doesn't come from the outlet in the wall, and i-pads don't appear of their own volition at the Apple store.

There are at least a billion people world wide with no indoor plumbing or electricity. The world demands a higher standard of living, and it is disingenuous for those of us with two cars and a two thousand square foot house to say that the environmental damage must stop now. At the same time, the US economy is hurting. The minerals needed to lift the most impoverished people in the world into the age of toilets that flush into a treatment plant instead of the street at their doorstep will have to come from somewhere. Let's put Americans to work producing a salable product instead of just selling debt to the Chinese.

Please approve the Mount Hope Project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 388

Comment 1

I work for a heavy civil, mining general contractor that has maintained a local office in Carlin, Nevada since 1987. I have been following the development of the Mt. Hope Project for several years and have been anxiously waiting for them to secure the required regulatory approval and the project to break ground.
It appears the Company has retained many qualified persons who performed extensive planning and analysis including engineering, social, economic and very detailed environmental assessments in the Draft Environmental Impact Statement for the project. I am very confident in General Moly's management and their commitment to environmental stewardship.
The design and construction of this project will provide hundreds of well-paying construction jobs for 20 months and another 400 long-term well-paying jobs for decades to come. These jobs represent a tremendous benefit to fellow employees and to Eureka County, the State of Nevada, providing long-term economic benefits.
I support the Mt. Hope Project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389

Comment 1

BLM's approval of carefully designed projects like Mount Hope will do much to help close this glaring economic and national security gap.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389, Comment 2

As the DEIS shows, General Moly is committed to doing minerals development the right way. It has proposed a plan that will meet all required environmental standards on a small environmental footprint. Further assurances of environmental stewardship are exhibited through the extraordinary measures the company has committed to undertake to make sure the project is both protective of the environment/ wildlife and maximizes recreational opportunities. We would particularly point to General Moly's emphasis on minimizing impacts on local and regional water resources. Their plan goes to great lengths to assure that mining operations will not adversely affect other water consumers.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389, Comment 3

The Mount Hope mine will promote significant job and other economic opportunities in Nevada, creating an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during multi-decade life of the mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389, Comment 4

The Roundtable strongly urges the BLM to issue a final EIS and Record of Decision allowing the Mount Hope Mine to be built. Thank you for your consideration of these comments.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 390

Comment 1

Choose the NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 390, Comment 2

Do one foot and five foot water drawdown maps for this project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 390, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 390, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-079-Wild Horse Predators

Letter 390, Comment 5

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (Felis concolor) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-079-Wild Horse Predators

Letter 390, Comment 6

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future.
Disposition: Already addressed in planning documents

Response
CC-006-Local Hydrologic Model

Letter 390, Comment 7

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 390, Comment 8

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 390, Comment 9

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 390, Comment 10

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros … and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 390, Comment 11

Finally: if we take "multiple use" to mean a balanced representation of all the values and presences on the public lands taken as a whole, then the proposed action through its undermining of the relatively minor presence of wild horses in their small fraction of the public lands where they have a legal to live – clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, the Multiple Use and Sustainability Act and others.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 391

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 391, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 391, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 391, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 391, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 391, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 391, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 391, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 391, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 392

Comment 1

Choose the NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 392, Comment 2

Do one foot and five foot water drawdown maps for this project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 392, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 392, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 392, Comment 5

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (Felis concolor) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Lette 392, Comment 6

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future.
Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 392, Comment 7

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 392, Comment 8

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 392, Comment 9

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled. In it there would be no hope at all for the beautiful natural life community and its wild horses. Your treatment of the long-term viability of the affected wild horse population and the meta-population to which it contributes is entirely lacking.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 392, Comment 10

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros … and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 392, Comment 11

Finally: if we take "multiple use" to mean a balanced representation of all the values and presences on the public lands taken as a whole, then the proposed action through its undermining of the relatively minor presence of wild horses in their small fraction of the public lands where they have a legal to live – clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, the Multiple Use and Sustainability Act and others.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 393

Comment 1

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use are appropriately assessed
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 393, Comment 2

Ecological balance cannot be ascertained without scientific investigation and careful analysis of the area to include one foot and five foot water draw down maps.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 393, Comment 3

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and moved from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 393, Comment 4

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 393, Comment 5

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 393, Comment 6

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 393, Comment 7

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 394

Comment 1

Choose the NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 394, Comment 2

Do one foot and five foot water drawdown maps for this project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 394, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 394, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 395

Comment 1

choose NO ACTION ALTERNATIVE until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 395, Comment 2

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 3

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 395, Comment 4

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 5

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 7

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 395, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 9

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 396

Comment 1

BLM MUST CHOOSE The "NO ACTION ALTERNATIVE"
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 397

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 397, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Comment acknowledged; does not provide new information

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 397, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 397, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 397, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 398

Comment 1

I strongly urge adoption of the NO ACTION alternative
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 398, Comment 2

To do otherwise would violate the WFHBA on many points in addition to NEPA, since the proposed action would constitute a significant negative impact on the formerly healthy and vital Roberts Mountain Complex wild horse herd as well as the entire health of the range in that area – forage, wildlife, wild horses, water and the very land itself.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 398, Comment 3

Multiple use" means a balanced representation of all the values and presences on the public lands taken as a whole and the proposed action clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, and the Multiple Use and Sustainability Act.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 399

Comment 1

I would like to express my positive support for the Mt. Hope mining project proposed by General Moly. The outlined proposal, as well as the track record and commitment to sustainability that General Moly has proven, has my support as a tax payer and avid user of our public lands.

This project would create long term jobs for many in the state of Nevada. In addition to jobs created locally, using our countries natural recourses in a responsible manner strengthens our country as a whole.

Thank you for taking my opinion into consideration when making decisions regarding this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 400

Comment 1

I fully support the efforts of General Moly in their quest to mine in Eureka at the New Hope project. General Moly has a great track record when it comes to the environment and their ability to blend economic growth into such developments. The state of Nevada and the entire US needs more projects like this to energize the economy and build for the future. Please consider a positive stance when you vote on this application.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 401

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance".
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 401, Comment 3

This project encroaches on considerable acreage within thee HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 401, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 401, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 401, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 402

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 402, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 402, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 402, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 402, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 402, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 402, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 402, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 402, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 403

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 403, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 403, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 403, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 404

Comment 1

please stress to BLM to choose the NO ACTION ALTERNATIVE.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 404, Comment 2

The proposed impact to the wild horse populations in affected HMA's is not acceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is unacceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 3

Prior to any the decisions of the project proposals, 1' & 5 ' water draw down maps need to be created.
Formulating a record of decision, without this information is inappropriate & negligent, to the mandate of a "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 404, Comment 4

This project encroaches on considerable acreage within three HMA's.
* Roberts Mountain has 13,000+ acres, within the scope of the project & 5,000+ acres of proposed surface disturbance.
* Whistler Mountain HMA has 8,000+ acres, within the project scope & 3,000+ acres projected for surface disturbance.
* Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 5

The Wild Horse populations in this area are confined (predominately re: Fish Creek) by boundary lines, that include 'limited to no water'.
As they move from within these HMA's, the impact to these areas & consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 6

The project will require 7000 gallons of water per minute, for the lifetime of the proposed use (40-50 years) & will remove 11,300+ acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 7

The known movement patterns of these horses, in these 3 areas indicate that the present HMA boundary lines were/are flawed and must be reviewed.
The lack of water sources within the boundary lines indicate they were faulty in their inception
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 404, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended.
If the project is to be considered, new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them.
In the event of impact, adjacent and equal acreage must be provided for these Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 404, Comment 9

This project has and does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 404, Comment 10

"No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 405

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 405, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 405, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 405, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 405, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 405, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 405, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
8) This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 405, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 405, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 406

Comment 1

This is what I have done in the past 65 years. Tried to keep them free.. I have seen them Poisoned Shot Yes by BLM U.S. National Forest Service RIFLES FOR HIRE. Now CHOPPERS FOR HIRE TO RUN THEM DOWN TELL THEY DIE. THEN YOU CALL YOUR SELF'S THE KEEPERS OF THE WILD HORSES YOU WILL LIKE THIS> NO CUTTING YOU DOWN JUST THE TRUTH. Play it Please
Disposition: Other (SEE RESPONSE)

Response
This comment is beyond the scope of this EIS.

Letter 407

Comment 1

I strongly urge adoption of the NO ACTION alternative.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 407, Comment 2

To do otherwise would violate the WFHBA on many points in addition to NEPA, since the proposed action would constitute a significant negative impact on the formerly healthy and vital Roberts Mountain Complex wild horse herd.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 407, Comment 3

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (Felis concolor) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 407, Comment 4

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future.
Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 407, Comment 5

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 407, Comment 6

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 407, Comment 7

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 407, Comment 8

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros … and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 408

Comment 1

As a supplier of products and Nevada resident I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit my employer, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
I would like to add my name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for me, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 409

Comment 1

The Nevada Department of Wildlife (NDOW) is concerned with direct, indirect, and cumulative impacts to fish and wildlife resources and habitats.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 409, Comment 2

NDOW has worked closely with all partners throughout the development and review of this project; however, there are still a few items in the proposed action that still need to be addressed. In section 2.1.14.5, the document states that unburied portions of the pipeline will have earthen crossings installed to allow sage grouse chicks to cross. Please note that these earthen crossings should also be seeded with an appropriate seed mix to 1) preclude the establishment of noxious and invasive weeds, and 2) provide cover to any sage grouse that use it.
Disposition: Other (SEE RESPONSE)

Response

The suggested text has been added to the Sage Grouse Conservation Measures included in Appendix D, Attachment 3 of the EIS.

Letter 409, Comment 3

Upon review of the mitigation triggers in Section 3.2 Water Resources – Water Quantity, Table 3.2-9 identifies specific mitigation triggers for potentially impacted surface waters. NDOW is concerned with the mitigation trigger for Roberts Creek. The document states that the mitigation trigger is "cessation of flow coincident with a reduction in ground water levels". NDOW does not want to see a cessation of flow before mitigation is triggered. This could have serious detrimental effects on the sport fishery in Roberts Creek, as well as other wildlife dependent upon the associated riparian and aquatic habitat. We recommend that a reduced flow, beyond the scope of previously documented low flows, should be enough to trigger mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 409, Comment 4

Impact 3.11.3.3-3 identifies potential impacts to vegetation associated with seeps, springs, and streams from the predicted water table drawdown. The mitigation measure for this impact states that riparian vegetation would be replaced; however it does not provide monitoring protocol for measuring the success of this mitigation measure. If the vegetation is stressed due to lack of water, riparian vegetation may not recover, even when replaced and supplied supplemental watering.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 409, Comment 5

The noise analysis in Section 3.16 only addresses Alpha Ranch, Roberts Creek Ranch, Risi Ranch, and the Diamond Valley residences as noise-sensitive receptor sites. There was a discussion to include several sage grouse leks in Kobeh valley as noise-sensitive receptor sites and to re-run the analysis to evaluate the potential impact to these resources. When is this analysis planned to be completed?
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 409, Comment 6

Additionally, the document states that in order for a noise impact to be significant, maximum noise levels must exceed 70 dBA at sensitive receptor sites. Where did this level of significance come from? The BLM's new IM states that projects that raise the noise level 10 dBA above ambient can have a significant impact on sage grouse lek activity. This analysis should be reevaluated.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 409, Comment 7

In Impact 3.16.3.3-4, there is no discussion on the potential impacts to leks, but there is the statement, in the Significance of Impact section for this item, that "greater sage-grouse leks could be significant if such activities occurred at nighttime or if the noise level exceeds 55dB." There are inconsistencies in this section that need to be addressed to ensure that sage grouse leks will not be significantly impacted by noise.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 409, Comment 8

Finally, in Impact 3.23.3.3-3, the DEIS acknowledges the potential impacts to sage grouse from noise and states that the mitigation in Appendix C will be effective to reduce impacts to sage grouse. However, there is no additional monitoring to ensure that these potential impacts will be insignificant and no contingency plan if impacts are significant and are realized. NDOW would like the opportunity to discuss these issues further with the BLM.
Disposition: Other (SEE RESPONSE)

Response
The BLM met with NDOW several times and has revised the noise requirements in Appendix D (formerly Appendix C in the DEIS) according to their requests.

Letter 409, Comment 9

The mitigation for the potential loss of water to wildlife in Impact 3.23.3.3-4 states that the development of six water development sites, as identified as mitigation for wild horses in Section 3.13, will also benefit wildlife. These developments, if designed for wild horses or livestock, may not provide benefits to wildlife. Wild horses have a tendency to exclude wildlife from water sources and otherwise damage them beyond use. Additionally, if the water developments are not designed properly for wildlife, they may not provide a benefit. NDOW would like the opportunity to discuss the development of drinkers and guzzlers designed to ensure benefits for wildlife (that may include exclusion fencing), should we find that wildlife are not benefitting from the water developments.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text for Mitigation Measures 3.23.3.3-4, 3.23.3.5-4, 3.23.3.6-4, and 3.23.3.7-4 have been modified as follows, "Mitigation for the potential loss of water would include the development of six water sites (Figure 3.13.1) that were identified for wild horses and two additional sites that would be designed specifically for wildlife use. Although the sites shown on Figure 3.13.1 were identified as part of mitigation for wild horses (Section 3.13), development of the sites could also result in indirect beneficial impacts to wildlife species throughout the Project Area. The locations and design of the wildlife-specific water developments would be determined by the Wildlife Working Group described in the Sage Grouse Conservation Measures in Appendix D, Attachment 3. Additional mitigation has been proposed for wetland vegetation in Section 3.11 (Mitigation Measure 3.11.3.3-3)."

Letter 409, Comment 10

There appears to be several inconsistencies in the reference to previous mitigation throughout the wildlife mitigation section. The mitigation for Impact 3.23.3.3-4 references the proposed wetland vegetation mitigation in Section 3.11 and states that "…wetland vegetation in Section 3.11 (Mitigation Measure 3.11.3.3-1), which includes a replacement of riparian vegetation at a 3:1 ratio with local cuttings, plugs, or seeds". However, when the reader refers to Impact 3.11.3.3-1, it states that "The Project would not result in the removal or disturbance of wetlands in the Project Area", hence the impact is not significant and no further mitigation is proposed. This inconsistency is carried through to Mitigation Measure 3.23.3.7-4, and may be systemic through the document. Please confirm that the impact is anticipated and there is a need for the identified mitigation to compensate for the loss of wetlands at a 3:1 ratio, and remove any ambiguity in the document.
Disposition: Factual correction made (SEE RESPONSE)

Response

Mitigation measures 3.23.3.3-4, 3.23.3.5-4, 3.23.3.6-4, and 3.23.3.7-4 have been corrected to reference mitigation measure 3.11.3.3-3.

Letter 409, Comment 11

NDOW has concerns about the proposed mitigation measure for golden eagles in Impact 3.23.3.3-8. The mitigation only states that monitoring will be conducted and if a negative impact is perceived, the BLM biologist will be notified. Notification and documentation of a negative impact does not provide mitigation for that impact. Notification and monitoring are insufficient measures to compensate for impacts. Some other positive action should be identified which will minimize of offset the impact. Additional language about what Eureka Moly and the BLM will do in the event of a negative impact should be included.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-041-Golden Eagle Mitigation

Letter 409, Comment 12

NDOW has concerns with the Longer, Slower Alternative. This alternative will have greater impacts to wildlife, as a result of the increased duration, and there is no additional mitigation proposed for those impacts from the increased duration of the project. Currently, the document states, in Impact 3.23.3.7-3, that impacts will be significant, but "no mitigation is proposed at this time." At a minimum, mitigation for significant impacts should be identified and in place. NDOW would like the opportunity to discuss additional mitigation for this alternative with both Eureka Moly and the BLM.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text for Impact 3.23.3.7-3 has been revised to be consistent with the impact identified for the Proposed Action, which includes the mitigation outlined in Appendix D, Attachment 3.

Letter 409, Comment 13

NDOW has been a partner with the BLM and Eureka Moly throughout the development of this document. The process has been long, and as such, in the past 4 years, there have been changes to suggested monitoring, mitigation, and management of sage grouse and their habitats. NDOW would like the BLM to utilize the Nevada's Energy and Infrastructure Development Standards to Conserve Greater Sage Grouse Populations, which has been adopted by the BLM. This document specifies that energy structures, including powerlines, should not be placed within a 3 mile buffer around active sage grouse leks. Additionally, it states that buried infrastructure such as pipelines and powerlines should not be constructed within 0.6 miles (1km) of lek sites. Finally, it suggests that sagebrush habitat be replaced at a 3:1 mitigation ratio. The BLM's recent IM provides guidance along these lines. These are based on the most current research and should be incorporated into mitigation for this project.
Disposition: Other (SEE RESPONSE)

Response

Nevada Energy and Infrastructure Development Standards to Conserve Greater Sage-Grouse Populations and Their Habitats (2010) has not been formally adopted by the BLM. However, the BLM referenced this document in the preparation of many of the design

features and mitigation measures included in the Sage Grouse Conservation Measures found in Appendix D of the FEIS. Additional consultation with NDOW was also conducted to ensure agreement on the final items included in Appendix D.

Letter 409, Comment 14

The final issue regarding mitigation is identified in Appendix 6 in the Mitigation Summary Plan. Under section 13 for Wildlife and Fisheries Resources, Mitigation Measure 6 states that EML will create a funding source for future sagebrush habitat improvement projects in the area. NDOW believes this is an extremely important mitigation measure and would like the opportunity to work with the BLM and EML on furthering its development. We feel strongly that this needs to be resolved before the FEIS. Please contact us to further these efforts.
Disposition: Analysis modified (SEE RESPONSE)

Response
The BLM conducted additional consultation with the NDOW to finalize the mitigation measures for sagebrush-obligate species. The mitigation for both greater sage-grouse and pygmy rabbits now includes measures for off-site habitat improvements based on the impacts resulting from the permanent loss of habitat within the project area. These requirements can be found in Mitigation Measure 3.23.3.3-9 and Appendix D of the FEIS.

Letter 410 (F1) through Letter 791 (F1)
See Letter 248 for form letter text and response.

Letter 792

Comment 1

I would like the mine to put in a watering area on the east side of the boundary fence
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-118-Range Mitigation

Letter 792, Comment 2

Restore water at the Romano stock well for watering livestock
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-118-Range Mitigation

Letter 792, Comment 3

Run a 114 "black pvc pope from the pond 400 to 500 feet on the east side of the boundary fence into a 12' power river trough.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-118-Range Mitigation

Letter 793

Comment 1

Please choose No Action Alternative
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 793, Comment 2

the BLM is mismanaging the land and herds they are supposed to protect. Methods of roundups are in violation of the Roam Act. Leave our horses alone.

After forty years it is obscene that no care standard exists for the only animal in our history to have an entire act of Congress devoted solely to it's protection.

Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 794

Comment 1

NO ACTION ALTERNATIVE is the only way to proceed until a humane & reasonable alternative can be reached.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 795

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.
The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.

As someone who cares about the environment and making sure American families have the ability to make a living, I couldn't ask for a better project than that proposed by General Moly for the molybdenum mine at Mount Hope. This project has taken into consideration the great beauty and wildlife of the surrounding environment. It will also be a major source of employment for the region. More mineral-rich areas should follow General Moly's example when it comes to utilizing our natural resources soundly and with great economic benefit.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 796

Comment 1

In table 3.2-9 and 3.2-18, mitigation measures call for substantial diversion rates that are over and above the 11,300 acre feet per year of appropriated water. For example, one mitigation measure for a cessation of flow in Henderson Creek would call for an interbasin transfer of water from Kobeh Valley in the amount of approximately 1400 acre feet of water. This is in addition to the 11,300 acre feet of groundwater required for the project. This project does not have sufficient water for this mitigation measure.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-062-Mitigation of Diminished Water Flows

Letter 796, Comment 2

To intentionally discount the importance of these groundwater resources and to not include the Nevada Department of Water Resources as a cooperating agency and to not cite Nevada Water Law statutes when considering environmental impact severely impairs the credibility of the document. The impacts of this project could negatively affect the viability of the agricultural base in Eureka County and will, by EML's own admission, impair vested rights and subsisting rights in the vicinity of the project. This is in direct violation of NRS 533.085 and NRS 533.495.
Disposition: Already addressed in planning documents

Response
CC-072-Project Impacts to Water Resources

Letter 796, Comment 3

The DEIS document is replete with possible impacts to water, but is obviously lacking in the proper way to address the impacts to affected owners of water rights. It is imperative to reference Nevada Water Law statutes because vested rights and subsisting rights cannot be impaired.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 796, Comment 4

I am very concerned about the obvious impacts from traffic on SR278. I am even more concerned that the DEIS concludes that these impacts are insignificant. An increase in 19 truck trips per day to deliver chemicals is an 85% increase over current truck trips, not the 15 percent stated in 3.24.3-1. When increased passenger car traffic is added, this is obviously significant and mitigation is required.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-069-Mitigation for Impacts to Highways

Letter 797

Comment 1

The proposed impact to the populations of affected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 797, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 797, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 797, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 797, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Other (SEE RESPONSE)

Response
Section 3.13 outlines the potential impacts to wild horses and mitigation for all the alternatives that are analyzed in the EIS. No changes have been made to the EIS to address this comment.

Letter 797, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 798

Comment 1

I urge the BLM to choose the "No Action" alternative
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 798, Comment 2

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 798, Comment 3

No action must be chosen until the full impact to this legally mandated use is appropriately assessed
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 799

Comment 1

Choose the NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 799, Comment 2

Do one foot and five foot water drawdown maps for this project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 799, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving natural ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 799, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas. Thank you for your consideration. Marilyn Wilson, 3345 Beitey Rd., Valley, Wa., 99181.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 800

Comment 1

I support the Mt. Hope project being permitted and allowed to move forward into construction and operation. The Draft EIS appears complete. I am convinced that the project will be developed and operated in an environmentally and socially responsible manner. Our country needs investments that result in job creation and economic benefit that also protect the environment and respect social aspects, and the Mt. Hope project would accomplish all of these.

Please support the Mt. Hope project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 801

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 801, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds and other wildlife.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 801, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 802

Comment 1

FLPMA (The Federal Land Policy and Management Act of 1976) policy directs that BLM manage our land to "best meet the present and future needs of the American people", the DEIS fails to establish this fundamental step because the prevailing market need for the Moly is foreign.
Disposition: Other (SEE RESPONSE)

Response

CC-111-FLPMA Compliance

Letter 802, Comment 2

The DEIS recognizes Diamond Valley as the Terminus of the Diamond Valley Regional Flow System, but excludes all underground water rights and pending applications for underground water rights by Eureka Moly or its subsidiaries. This discredits the ability of the DIES to make a fair and equitable assessment of the Water Resource and potential impacts of a huge project, 80 year time line and hundreds of year's drawdown due to an open pit that physically intersects 3 basins, Diamond, Kobeh and Pine valleys.
Disposition: Comment acknowledged; does not provide new information

Response

CC-010-EML Water Rights

Letter 802, Comment 3

A 5ft drawdown contour would be much more conservative assessment to impacts to vested surface rights, springs and meadows in the Well Field valley, and also a precursor to groundwater effects between basins that most likely share an underground aquifer.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 802, Comment 4

The Long Term Totally Consumptive use of the Water Resource by the project is not environmentally responsible given existing water use challenges. Pumping the majority of water from the original point of diversion (Bobcat Ranch) would have saved everyone millions of dollars and time.
Disposition: Already addressed in planning documents

Response

CC-072-Project Impacts to Water Resources

Letter 802, Comment 5

Monitoring cannot be considered Mitigation. Curtailing the projects ground water pumping is a mitigation measure that Nevada Water Law provides, the DEIS should incorporate this management tool as a relevant, reasonable mitigation measure.
Disposition: Comment acknowledged; does not provide new information

Response

CC-035-Monitoring Concerns

Letter 802, Comment 6

Mitigation measures and continued funding may be our only resource to alleviate negative affects if Eureka Moly Water Model predictions are wrong, potential impacts are larger than expected or the Mine closes. This long term project has potential to benefit its corporate owners at the expense of changing a community and its environment forever in a very negative fashion.
Disposition: Comment acknowledged; does not provide new information

Response
CC-073-Mitigation Impacts to Water Users

Letter 802, Comment 7

For these personal concerns and those of Eureka County and its citizens, I see no evidence this DEIS adequately protects potential impacts to the people, businesses and resources of Eureka County in its current form.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 803

Comment 1

…the DEIS continues to evade specification of an effective monitoring, management, and mitigation (3M) plan that enforces changes in project operations to avoid adverse impacts and that seeks foremost to anticipate and avoid such impacts; and while the slower, longer project alternative is included, it is not analyzed to demonstrate its benefits and thereby earn designation as environmentally preferable. In short, BLM must take greater steps to ensure its commitment to monitor and, if necessary, mitigate a full range of environmental impacts in cooperation with parties directly affected by the project. The County recognizes the difficulty in crafting a long-term 3M plan that commits firmly to dealing with mine-related problems, but the Mt. Hope project – with its decades of proposed operation and large geographical extent of impacts in Eureka County– requires nothing less.
Disposition: Already addressed in planning documents

Response
The FEIS discloses proposed mitigation by resource. Additionally, Section 2.1.15 of the FEIS describes that monitoring would be conducted for the project. This section also describes the formation of an advisory committee following issuance of a ROD. The Slower, Longer Project Alternative is analyzed in the FEIS on a resource-by-resource basis to disclose potential impacts.

Letter 803, Comment 2

At the conclusion of this letter the County provides specific comments addressed to identified paragraphs and pages of the DEIS. In this letter, we highlight thematically the analysis needed that in our judgment will produce compliance with the National Environmental Policy Act and Federal Land Management Policy Act, and more importantly produce a commendable Mt. Hope project. The County asks BLM to use this EIS and this project – a mining proposal in size and duration of virtually unprecedented intensity – to attain a state-of-the-art achievement in environmental assessment and minerals management.
Disposition: Already addressed in planning documents

Response
The BLM has complied, and will comply, with all applicable laws considering the impact of the proposed project. The Federal Land Policy and Management Act (FLPMA) and the 3809 regulations require that BLM prevent unnecessary or undue degradation of public lands by operations authorized under the mining laws, and anyone intending to develop mineral resources on public lands must prevent unnecessary or undue degradation of the land and reclaim disturbed areas. "Unnecessary or undue degradation" is defined at 43 CFR § 3809.5. As discussed in Sections 1.1 and 1.5.2 of the EIS, in order to use public lands managed by the BLM's Battle Mountain District Office, EML must comply with the BLM Surface Management Regulations (43 CFR 3809) and other applicable laws, including the Mining and Mineral Policy Act 1970 (as amended) and FLPMA. In assessing compliance with the unnecessary or undue degradation standard, BLM looks at the law, the regulations, and agency guidance. BLM's analysis of EML's Plan of Operations for the Project complies with statute, the regulations, and applicable guidance. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 3

The affected natural resource that pervades the entire project and its surrounding environment is water. The DEIS's failure to treat this resource with requisite attention, detail, and quantification affects the sustainability of this resource on its own; but perhaps more importantly, the failure to protect water produces a failure to protect resources critical to Eureka County agriculture and recreation and the health and wellbeing of the County's residents. The County highlights as an example the superficial treatment of proposed dewatering of Roberts Creek (including the corollary of increasing groundwater extraction to pipe that substitute supply into the creek as a mitigation measure). The County questions the DEIS's assertion that reduction in creek flow will not become significant until the stream is completely dewatered; and the corollary suggestion that expanding groundwater extraction, beyond that already specified for direct application to mining operations, and lacing the landscape with pipes, would provide worthy or effective mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 803, Comment 4

Related to the proposal at Roberts Creek, with its threat to one of Eureka County's rare natural water and recreational resources, is the DEIS's failure to analyze the consequences of providing a substitute source of mining operation water by moving the mine's proposed Kobeh Valley groundwater pumping field south into the phreatophyte zone. The wisdom, and indeed the feasibility, of this suggestion cannot be measured from the DEIS, which fails to apply well-established analysis to define changes in surface vegetation resulting from discrete levels of groundwater drawdown. And without a measurement of vegetation change, the DEIS is not capable of measuring associated increases in fugitive dust and attendant air quality degradation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020- Impacts to Phreatophytes

Letter 803, Comment 5

Related to measures that can mitigate the mine's water demand without creating yet additional water demand, the County has proposed in its discussions with the mine owner that water demand be met with existing wet water in Diamond Valley, by securing and retiring an equivalent amount of available water rights in Diamond Valley. Because these discussions have not borne fruit, BLM should take the initiative to include this option in its final assessment of water resources.
Disposition: Comment acknowledged; does not provide new information

Response
This type of mitigation would not mitigate any of the direct impacts of the Project to ground water or surface water. Therefore, this type of mitigation is not considered appropriate for this Proposed Action.

Letter 803, Comment 6

These examples reveal an even more fundamental shortcoming in the draft EIS: a failure to provide a water budget for existing water uses, the mining project, and the project's proposed mitigation measures. In an attempt to anticipate and accommodate stated objections to the project as proposed, the DEIS promises much but fails to establish that on its own, or in the company of all its promised mitigation, the mine, existing users, and the environment are capable of being supported by the natural water resources of Eureka County.
Disposition: Already addressed in planning documents

Response
CC-047-Water Availability

Letter 803, Comment 7

The County needs this missing analysis so that it can as cooperating agency assist BLM and the mine proponent in establishing an operation that is both beneficial and actually feasible of being accomplished. If, for example, the limited water resources available dictate that mining operation will require a loss either of Roberts Creek or of the phreatophytic vegetation to the south, the public and BLM need knowledge of the benefits and costs of the trade-off presented.
Disposition: Already addressed in planning documents

Response
CC-047-Water Availability

Letter 803, Comment 8

The EIS's air quality section fails to establish baseline air pollution values derived from monitoring within the affected area. The EIS instead utilizes data from several other locations around Nevada as its baseline for assessing the project's impacts. (EIS 3-272.) These locations vary enormously in their characteristics—Boulder City is 21 miles southeast and Jean 30 miles southwest of Las Vegas, while Great Basin National Park and its Lehman Caves National Monument are far removed from any metropolitan area—yet the EIS claims that all of these sites "conservatively represent" the background pollution concentrations at the Mount Hope site. (Id.) Two sites bordering one of the desert Southwest's largest urban agglomerations, and two sites in one of the most isolated and pristine areas of the lower 48 states, cannot conceivably represent comparative equivalence in air pollution levels. Claiming that all four sites are "conservatively high" reference points defies reality and highlights the need for local air quality data.
Disposition: Other (SEE RESPONSE)

Response
CC-129- Baseline Air Pollution Levels

Letter 803, Comment 9

To provide a proper assessment of the project's likely impacts on criteria air pollutant concentrations around the project site, the concentrations in the affected area itself must form the baseline for analysis, not the concentrations in proxy areas dozens or hundreds of miles away in different air basins with different sources of pollution. The importance of establishing locally relevant baseline data is amplified where, as in this case, the emissions from the project will push ambient air quality close to the legally permissible level for several pollutants. (EIS 3-276 to 3-277.) The existing, large-scale mines in Eureka County also undoubtedly affect the region's air quality, and by not basing its analysis on datasets that encompass these sources, the EIS has divorced its air quality modeling from the local conditions in which the proposed mine will operate. The EIS's conclusions are therefore unreliable as a measure of the project's potential effects on Eureka County.
Disposition: Other (SEE RESPONSE)

Response

CC-129- Baseline Air Pollution Levels

Letter 803, Comment 10

Instead of depending on unfounded assumptions about the atmospheric equivalence of Eureka County and other parts of Nevada, BLM should establish air quality monitoring stations within the same air basin as the proposed mine, collect data for an appropriately representative period, and apply these data to the EIS's assessment of air quality impacts. This is the only means of determining, with any degree of accuracy, the project's effects on Eureka County's ambient air quality. We understand that this effort may require up to 18 months of monitoring, but the applicant and BLM have had years in which to accomplish this.
Disposition: Other (SEE RESPONSE)

Response

CC-129- Baseline Air Pollution Levels

Letter 803, Comment 11

The EIS suffers from additional infirmities in its analysis of the project's likely contributions to increased air pollution. One infirmity arises in the EIS's failure to consider how the drawdown of Kobeh Valley's groundwater will affect phreatophytic plants. As the EIS acknowledges, the mine's groundwater withdrawals will lower the water table in Kobeh Valley, creating conditions that could result in the dislocation or death of phreatophytes. (EIS 3-276.) While stating that these conditions may prevent soil crusting and generate wind-blown fugitive dust, the EIS dismisses such emissions as having merely an "incremental impact on the air quality in the vicinity of the Kobeh Valley." (Id.) No studies or analysis support this statement, though, and the EIS provides no evidence for its nonchalant treatment of this potentially significant source of particulate matter.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 12

Similar projects in the West have undertaken the analysis that is lacking in this EIS, and others have demonstrated the necessity of this analysis. The Los Angeles-Owens Valley groundwater pumping project, for example, culminated in an agreement to prevent vegetation change that would have led to fugitive dust emissions, accompanied by a meaningful environmental impact report. The EIS here should employ these available technologies to model the impacts of phreatophyte dislocation or death, and if such analysis reveals the impacts to be significant, BLM must craft mitigation measures that will prevent fugitive dust emissions while also avoiding an invasion of non-native plants in the affected areas.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-080-Fugutive Dust Emissions Mitigation

Letter 803, Comment 13

The EIS furthermore relies on an equipment manufacturer's assertions that the project will incorporate untested technologies—with claims of efficiency that exceed existing systems by a substantial margin—to reduce its air quality impacts below the level of significance. If these technologies fail to achieve their lofty targets, the EIS provides no backstop. There are no management actions and no mitigation measures that would address such a failure, and without these, the EIS ignores assessment of contingencies that would materially alter the project's impacts on the environment. BLM should establish a suite of management actions and mitigation measures that would enable the expeditious resolution of any problems associated with technological failure of air pollution control equipment.
Disposition: Comment acknowledged; does not provide new information

Response

Control efficiencies used in the air emissions inventory and dispersion model are a combination of agency-accepted values and manufacturers' estimates. This approach is both valid and consistent with accepted methods. The results of the modeling provided in the FEIS, therefore, disclose potential impacts using the best available science. Nevada has authority to regulate air quality, including delegated authority from the EPA for regulation of federal standards. The Project would be subject to the conditions of an NDEP-issued air quality permit to ensure adherence to emission limits and pollution controls, and preserve ambient air quality standards. It should be noted that the Project would include emission control technologies that have a long history of widespread use, and thus their control efficiencies are well-established.

Letter 803, Comment 14

As the mine proceeds into operation, determining the project's actual air quality impacts and effectively managing and mitigating them will require robust monitoring. Under Nevada's draft air quality permit, EML would need to install only a few air quality stations around the pit (measuring particulate matter on a non-continuous basis with filters) and continuous monitoring systems on the ore processing plants' stacks. This equipment will not capture mobile source emissions, nor will it measure detrimental air quality impacts that accrue beyond the project's borders. While Eureka County residents will bear the brunt of these impacts, they will not even know the extent and characteristics of these impacts once the impacts occur. BLM should as part of the 3M plan require EML to install air quality monitoring equipment that will provide relevant and usable data to enable management and mitigation of project emissions, as necessary, during the project's many years of operation.
Disposition: Comment acknowledged; does not provide new information

Response

CC-107-Air Quality Monitoring and Mitigation

Letter 803, Comment 15

Socio-economic impacts, and the means of eliminating or substantially reducing them, have not been adequately addressed. Project benefits are touted in terms of tax revenue to the County, and the favorable slower, longer alternative dismissed for not providing the most revenue in the shortest time. Contrary to the EIS's reliance on conventional wisdom, however, a projected increase in public revenue is not the County's greatest concern. The DEIS falls short in completely ignoring what matters more to the County: the need to avoid social disruption and provide for the health, wellbeing, and economic stability of individuals, families, farms, and small businesses affected by the proposed mine.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-002-Socioeconomics General Disruption

Letter 803, Comment 16

In this respect, the DEIS fails to include a beneficial feature of the mine as initially proposed: the applicant's responsibility for housing for construction and mining workers. Without providing that the applicant meet this obligation, the DEIS essentially forces the County to assume the entire financial risk and burden of investing now in the creation of housing, infrastructure, and public services to be available when project construction begins.
Disposition: Other (SEE RESPONSE)

Response

CC-127- Socioeconomic Impacts to Eureka County

Letter 803, Comment 17

The County understands that BLM denies responsibility for addressing this impact as assertedly beyond its duty "to prevent unnecessary or undue degradation of public lands." See 43 U.S.C. § 1732(b). The DEIS must recognize, however, that failure to provide adequate housing for mine workers will inherently and unnecessarily degrade the public domain, by producing unsanitary and unsupervised encampments of these workers as trespassers on federal lands. The County and applicant have agreed that worker housing should not be provided at the mine site by the mine operator, but instead be sponsored by the County within the Eureka town community. The County needs BLM in its EIS to assert its authority to require the mine proponent to underwrite this County effort (in addition to others currently underway). Mere assertions that various beneficial impacts will flow to Eureka County as a result of the mine provide scant assurance that near-term problems will be adequately addressed.
Disposition: Other (SEE RESPONSE)

Response

CC-127- Socioeconomic Impacts to Eureka County

Letter 803, Comment 18

The DEIS's discussion of cumulative impacts fails to inform the public and decision-makers of the true likelihood and magnitude of such impacts. This failing results partially from the DEIS's analysis of artificially circumscribed cumulative effects study areas (CESAs) that ignore major projects barely outside the CESAs' borders but well within the range of cumulative impacts. Two other mines excluded from the analysis illustrate this failing. The Horse Canyon and Cortez Hills open pit gold mines in central Eureka County will employ hundreds—if not thousands—of workers, withdraw substantial quantities of groundwater, and generate air pollution within air basins adjacent to the proposed project. The DEIS also neglects to analyze likely projects, such as the solar development area in southern Eureka County, that are within certain CESAs and outside others. These projects will all affect water resources, air quality, and socioeconomic aspects of Eureka County, but the potential cumulative impacts remain unknown to both BLM and the public.
Disposition: Other (SEE RESPONSE)

Response

CC-130- Cumulative effects analysis

Letter 803, Comment 19

Financial assurance is an essential element that sto Project would consist of reclamation bonding and hould be disclosed in the DEIS because the viability of reclamation, closure and post-closure management is a critical factor in determining whether the project will be fully protective of environmental resources. This project is expected to adversely impact resources for at least 400 years, which is why long term, sustainable financial assurance is essential.

Financial assurance is critical to determining whether all commitments for proper closure, reclamation, post closure care, monitoring and contingency measures can be met by the applicant or its successor. We believe that the DEIS will be strengthened by analyzing these factors to determine the significance of potential impacts and the feasibility of long-term mitigation measures. BLM should require the applicant to provide adequate financial assurance that long term controls and post-closure management will be implemented when necessary during and after mine closure or cessation of mining at some earlier period not foreseeable, but possible, due to market conditions or technical issues. Without financial assurance, BLM and local residents could be left with the blight of a long term unfunded or underfunded liability in southern Eureka County.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 803, Comment 20

The County appreciates the progress that has been made in specifying the composition, creation, operation, and mandate of the mitigation advisory committee. Nonetheless, the text in ¶ 2.1.15 at page 2-70 still lacks the precision that meets the expectations of the County and federal regulatory agencies. The text should be revised to ensure that the underlined words are retained:
In addition to the monitoring requirements consistent with 43 CFR 3809.401(b)(4) and mitigation specified in the EIS for water resources, an advisory committee will be established, consistent with the requirements in FLPMA (43 USC 1712(c)(9)) and 43 CFR 1610.3-1(4), of "other Federal departments and agencies and of the States and local governments within which the lands are located" and "involvement of other Federal agencies, State and local government officials, both elected and appointed." This committee will include Eureka County.
The advisory committee will review and approve the water-related monitoring protocols, data, and reports, meet no less frequently than quarterly, and make recommendations to the BLM on operational changes or compliance issues.
The advisory committee will be established in the Record of Decision and be incorporated in Plan of Operations Approval.
We are also very concerned about the threshold outlined in the DEIS of "cessation of flow coincident with reduction in ground water" before any mitigation would be necessary. Cessation of flow at any water source would be a failure of the monitoring, management, and mitigation program.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-061-Mitigation Advisory Committee

Letter 803, Comment 21

As summarized above and detailed in the pages to follow, the DEIS has not included at all the promised one-hour NO2 modeling, a water budget for the project and its mitigation, properly framed mechanics for monitoring, management and mitigation, an air quality baseline, and phreatophytic vegetation evaluation. The County suggests that BLM prepare a focused supplemental DEIS that includes these matters, and circulate that analysis for public comment confined to its contents. In that way, BLM will avoid preparation of a final EIS for which recirculation would then be required for a much lengthier public review.
Disposition: Analysis modified (SEE RESPONSE)

Response
Revised modeling has been completed and incorporated into the FEIS including information regarding one-hour NO2. Water budgets are disclosed in Tables 3.2-11 and 3.2-12. The analysis of Project-related impacts to phreatophytes has been revised in the FEIS.

Letter 803, Comment 22

Note to BLM: In most cases, BLM never provided specific response to our review and comment on baseline reports related to the Mt. Hope Project EIS and changes were not made in the DEIS to address these comments. We ask BLM to review our previous comments on the baseline reports, provide specific responses on these comments, and incorporate changes into the EIS to address outstanding issues.
Disposition: Comment acknowledged; does not provide new information

Response
In accordance with the Memorandum of Understanding between the BLM and Eureka County, Eureka County had the opportunity to review and comment on drafts of the baseline reports. The BLM considered input from Eureka County in the development of these reports and in determining the adequacy of these reports for use in the EIS. Although not all of the Eureka County's suggestions were adopted, all comments were considered and the baseline reports have now been finalized.

Letter 803, Comment 23

In our specific review of each section of the DEIS we make comments and request changes on the Proposed Action analysis. These also cascade through and apply to all discussions of the Partial Backfill Alternative, the Off-Site Transfer of Ore Concentrate for Processing Alternative, and the Slower, Longer Project Alternative. This is especially true where the impacts and descriptions are essentially the same for each alternative. Please make the same changes as requested under the Proposed Action of each section, where applicable; we did not repeat all of the comments made on the Proposed Action for the other alternative of each section.
Disposition: Analysis modified (SEE RESPONSE)

Response
Revisions to address Eureka County comments have been incorporated into discussions on all of the alternatives as applicable in the FEIS.

Letter 803, Comment 24

Analysis must be reworked throughout entire document to focus on avoidance or reduction of all adverse impacts related to the project regardless of BLM arbitrarily defined significance. Continuing to focus on only reduction of BLM defined impacts of significance undermines the intent of NEPA which is underscored in the BLM NEPA Handbook on p. 61 where it states, "Mitigation includes specific means, measures or practices that would reduce or eliminate effects of the proposed action or alternatives" and "Mitigation measures can be applied to reduce or eliminate adverse effects..." and further, "Mitigation may be used to reduce or avoid adverse impacts, whether or not they are significant in nature."
Disposition: Analysis modified (SEE RESPONSE)

Response
The FEIS has been revised to include a statement at the end of Section 3.1 that clarifies that the analysis is conducted to make a significance determination which does not preclude the identification of mitigation. The FEIS includes mitigation for impacts, whether or not they meet the established significance criteria. Impact text throughout the FEIS has been revised to clarify that development of mitigation is not triggered by whether or not the impact is significant.

Letter 803, Comment 25

Interestingly, the BLM NEPA Handbook specifically and explicitly clarifies the meaning of "significance" as intended by NEPA and CEQ regulations. The NEPA Handbook in Section 7.3 (p. 70) clarifies that: "Whether an action must be analyzed in an EA or EIS depends upon determination of the significance of the effects" and continues, "Significance is defined as effects of sufficient context and intensity that an environmental impact statement is required. The CEQ regulations refer to both significant effects and significant issues (for example, 40 CFR 1502.2(b)). The meaning of significance should not be interpreted differently for issues than for effects: significant issues are those issues that are related to significant or potentially significant effects."
Any discussion of significance in the EIS is not justified or necessary and does not belong. Simply stated, since the Mt. Hope Project required analyses in an EIS, the BLM is obligated to require and ensure that any adverse impact identified has reasonable mitigation framed and committed. Please revise to disclose every potential impact and frame mitigation to address any identified impact.
Disposition: Comment acknowledged; does not provide new information

Response
CC-134- NEPA significance threshold and mitigation

Letter 803, Comment 26

1.1 Page 1-1: The number of Plans of Operation (PoO) revisions is relevant and should be disclosed. This number (12 or 13?) informs the public about the extent to which the project has changed during the lengthy EIS process and still continues to evolve. Even as the DEIS has gone out for public review, another PoO revision is currently being drafted.
Disposition: Comment acknowledged; does not provide new information

Response

The EIS discloses when the original and most recent Plan of Operations was submitted. The number of revisions does not necessarily inform the public of the extent to which the Project has changed as the nature of the modifications vary substantially from minor language changes in the text of the Plan to actual design changes in response to changing conditions or new information.

Letter 803, Comment 27

1.1 Page 1-1: Since there is a "potential the timing on the implementation or duration of components of the Project could vary," the EIS must describe how much latitude would be granted to EML in varying the timing of the Project's components. As the EIS reads now, the reader is left to guess at the variability that BLM might allow, which does little to disclose to and inform the public about what should be anticipated. This is especially necessary in light of both the large number of potential projects in the vicinity of southern Eureka County and the changes that a delay in the implementation of components of the Proposed Action would create for the conclusions currently drawn in this EIS regarding cumulative impacts and RFFA.
Disposition: Comment acknowledged; does not provide new information

Response

Given the inherent variability in mineral deposits, there is always the potential for some degree of change to the timing or sequence of development. BLM regulations at 43 CFR 3809 have been developed to recognize this inherent variability in the ore deposits. As a result, implementation of the Project would include EML coordination with a BLM compliance officer (including site inspections), as well as EML preparation of annual disturbance reports and bond updates as required by 43 CFR 3809. Following Project implementation, the BLM may require supplemental NEPA for the Project if there is a change in the Project design and/or major changes in the environment. Additionally, EML has agreed to provide periodic updates on Project progress to Eureka County so they will be aware of any variations from the currently proposed project schedule. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 28

1.1 Page 1-2: The paragraph that outlines the purposes of an EIS should be amended to include a statement about the EIS's examination of mitigation measures.
Disposition: Comment acknowledged; does not provide new information

Response

The EIS states that the "purposes of an EIS are as follows: a) to analyze potential impacts from the Project based on the Proposed Action; b) to identify reasonable alternatives; c) to inform the public about the Project; d) to solicit public comment on the Project and alternatives; and e) to provide agency decision makers with adequate information upon which to base the decision to approve or deny the Project or an alternative development scenario." "Adequate information" includes, but is not limited to, mitigation; therefore, no change has been made in the FEIS in response to this comment.

Letter 803, Comment 29

1.1 Page 1-2: We question whether the DEIS "is prepared in compliance with NEPA" and various other BLM regulations, as well as CEQ's regulations. We have continued to point out to BLM that many of these regulations require coordination with Eureka County and efforts to achieve consistency with Eureka County plans and policies to the maximum extent possible. Despite our continual requests, however, the DEIS makes no effort to discuss these inconsistencies. This paragraph can legitimately claim that the EIS complies with NEPA only when BLM has taken the maximum effort to reconcile these conflicts. We will continue to point out these specific areas again in the comments that follow.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-131- NEPA compliance with Eureka County

Letter 803, Comment 30

1.5.1 Page 1-8: The RMP states that one of its objectives is to "[m]ake available and encourage development of minerals to meet national, regional, and local needs consistent with national objectives for an adequate supply of minerals." The EIS, though, does not explain how this Project will conform to the RMP by meeting national, regional, or local needs. In reality, the Proposed Action cannot conform to the RMP because, as proposed, it does not meet local needs and cannot possibly meet regional or national mineral needs when nearly all of the extracted Mo (100% of all production in the first five years and 100% of the production currently accounted for in contracts for the second five years) will go overseas.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

The final destination of molybdenum mined from the project is outside the scope of analysis in the FEIS. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 31

1.5.1 Page 1-9: To conform to the RMP, the Proposed Action must have "minimal environmental disturbance…" and we contend that the EIS has overlooked or disregarded many measures that would minimize "environmental disturbance." We have highlighted these measures repeatedly to the Proponent and BLM over the past few years and underscore them again here in our comments on the DEIS, especially as they relate to alternatives analyzed and mitigation measures outlined.
Disposition: Comment acknowledged; does not provide new information

Response

The regulatory standard for the Project is based on the regulations at 43 CFR 3809. The BLM has reviewed the Plan of Operations and determined that it is in compliance with the requirements under 43 CFR 3809, which uses an unnecessary or undue degradation standard. This standard allows for disturbance and activities inherent and reasonably incident to mining.

Letter 803, Comment 32

1.5.4 Page 1-10: We asked BLM to revise this section on both ADEIS with inclusion of language to read, "Some elements of the Proposed Action would be in conformance with these plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies." BLM's response was that "Based on a review of the County Plan, no specific instances of non-conformance were identified." BLM inaccurately cites general County policy support of mining and economic development in a vacuum without taking into account all other plans, goals, and policies as a whole related to impacts on air quality, wildlife, water resources, private property, grazing, etc. Eureka County specifically pointed out these inconsistencies in our previous comments. Again, we highlight the following policies, word-for-word, that components of the Proposed Action are in conflict with including, "use of the best available science and technology to ensure adequate protection of land, air, and water resources …[including]… adequate and proper mitigation; maintaining water resources in a condition that will render it useable by future generations for the full range of beneficial uses that further a viable and stable economic and social base for its citizens; maintain or improve soil, vegetation and watershed resources in a manner that perpetuates and sustains a diversity of uses while fully supporting the custom, culture, economic stability and viability of Eureka County and our individual citizens; mitigation of mining activities that may impair the economic future of Eureka County citizens; prevention of significant deterioration of the superior air quality found in Eureka County; and maintain, improve or mitigate…impacts to habitat in order to sustain viable and harvestable populations of…species as well as wetland/riparian habitat for…other game and non-game species." BLM can only say that the EIS is in compliance when the maximum effort has been made by BLM to work with Eureka County, the guardian of its own policies, to reconcile these conflicts.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-131- NEPA compliance with Eureka County

Letter 803, Comment 33

1.7 Page 1-12: One concern voiced by local residents was that BLM did little to inform southern Eureka County residents of the Mt. Hope Project during the scoping period. As highlighted in this paragraph, the Eureka Sentinel (the County's paper of record) was not included as a source for publishing announcements of scoping meetings. For future projects within Eureka County, please ensure that notices are published in the Eureka Sentinel so that those residents who are not on BLM's "interested public" lists are properly informed.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted. Public participation for this Project is outlined in Section 5.1 of the EIS.

Letter 803, Comment 34

2.1 Page 2-1: 43 CFR 3809.401 requires much more than is outlined here. In fact, many of the specific items that Eureka County has continued to request are required for reclamation plans by 43 CFR 3809.401. Specifically missing are riparian mitigation (43 CFR 3809.401(b)(3)(iv)), wildlife habitat rehabilitation (43 CFR 3809.401(b)(3)(v)), and re-vegetation (especially related to phreatophytes) (43 CFR 3809.401(b)(3)(vii)). Additionally, 43 CFR 3809.401(b)(4) requires that monitoring plans include "type and location of monitoring devices, sampling parameters and frequency, analytical methods, reporting procedures, and procedures to respond to adverse monitoring results" and "monitoring programs which may be necessary include...air quality, re-vegetation...noise levels..." EML's proposed monitoring plans, in many cases, fail to include "sampling parameters and frequency, analytical methods, reporting procedures, and procedures to respond to adverse monitoring results." This is particularly the case for fugitive dust (air quality) resulting in phreatophyte die-off, re-vegetation plans, and noise levels. In fact, there are not even plans for re-vegetation or for

monitoring noise and air quality outside of the mine site. BLM must ensure that these missing plans are included in the PoO and adequately analyzed in the EIS.
Disposition: Other (SEE RESPONSE)

Response

The Plan meets the requirements of the 3809 regulations and has been determined by the BLM in September 2007 to be complete and adequate for evaluation under the NEPA. Additionally, monitoring and mitigation is identified in the FEIS on a resource-by-resource basis. No change has been in the FEIS in response to this comment.

Letter 803, Comment 35

2.1 Page 2-1: The EIS reports "approximately 1.1 billion pounds of recoverable Mo," but General Moly consistently reports in public presentations (many available on their website) 1.3 billion pounds of recoverable Mo. Also, both previous ADEIS had language reporting 1.3 billion pounds. Please explain why this discrepancy exists.
Disposition: Other (SEE RESPONSE)

Response

There are 1.3 billion pounds of "contained" Mo and 1.1 billion pounds of "recoverable" molybdenum, based on a recovery of approximately 85 percent. The EIS accurately states that the ore body would "produce approximately 1.1 billion pounds of recoverable Mo".

Letter 803, Comment 36

2.1.1 Page 2-4: The EIS states that "up to 2.7 billion tons" of ore and waste rock would be excavated whereas the ADEIS previously mentioned "up to 2,708 million tons" and later on in this DEIS the figure of "2,708" is used. The figure of 2,708 million tons is more than 2.7 billion tons. We made this comment on the previous ADEIS. BLM's response that only one significant digit is used does not get to the heart of the issue. If BLM is going to continue to use "up to," then it will have to ensure that no more than 2.7 billion tons are excavated. Using only one significant digit with such huge numbers understates or ignores the scope and scale of certain elements of the project. We propose that final numbers in the EIS should be reported in millions rather than billions to overcome this issue (e.g. 2,708 million vs. 2.7 billion).
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in the FEIS has been revised to read "approximately 2.7 billion tons" rather than "up to 2.7 billion tons".

Letter 803, Comment 37

2.1.1 Page 2-4¬¬: Please explain why "… some in-pit waste rock disposal of non-PAG may be conducted" or would be necessary.
Disposition: Analysis modified (SEE RESPONSE)

Response

The FEIS has been revised to include the following language in Section 2.1.1, "This may be done as a temporary measure during development of the mine when mining and preparation of WRDFs are occurring simultaneously. At this time waste rock produced from the pit may be placed within the pit to allow continued pit development and later placement of this waste rock in the developed WRDF. Temporary placement of waste would not exceed 12 months. In addition, in-pit disposal may become economically preferable during the later stages of mine development when portions of the pit have been mined to the full design extent. Permanent placement of waste rock in the mined out areas would be limited to Non-PAG waste rock."

Letter 803, Comment 38

2.1.1 Page 2-4: Please define the range of years for early, middle, and end of project life, referred to in on page 2-4 and in the referenced figures that follow.
Disposition: Other (SEE RESPONSE)

Response

The reader of the FEIS should consider that Figures 2.1.1 through 2.1.6 have been prepared to represent stages of development and should not be assumed to represent any specific point in mine life. Based on the 44-year mine life, the figures representing early stages in mining can be assumed to cover years 2 through 12, the figures representing the mid-stages in mining can be assumed to cover years 13 through 35, and the figures representing the late stages in mining can be assumed to cover years 36 through 44.

Letter 803, Comment 39

2.1.2 Page 2-17: Insert language to clarify that 11,300 afa of water is required from the wellfield alone. This paragraph's current phrasing makes it appear that only 7000 gpm of "process water" will be in the system. In reality, process water encompasses all components listed (e.g., wellfield, TSF, runoff...) and is much more that 11,300 afa. Please revise to report the average amount of water that will be in the process stream at any given time.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 803, Comment 40

2.1.2.1 Page 2-17: The sentence that ends "if water is found to be in surplus" is confusing and inaccurate. Water can never be "in surplus," but various water sources within the mine's processing operation (tailings, WRDF, runoff, etc.) may provide periods of more water return to the system. Perhaps this sentence could read: "Pumping from the wellfield would be reduced if water from other components of the processing operation provides enough water for processing to allow for decreased pumping in the wellfield."
Disposition: Other (SEE RESPONSE)

Response

The third sentence in the first paragraph of Section 2.1.2.1 of the FEIS has been deleted and replaced with, "Pumping from the wellfield would be reduced if water from other sources provided enough water for processing and other water requirements to allow for decreased pumping in the wellfield."

Letter 803, Comment 41

2.1.2.1 Page 2-18: If there is a change in the number or location of wells, Eureka County requests that BLM properly coordinate with the County on what would be considered "an appropriate level of environmental review under NEPA."
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 803, Comment 42

2.1.2.2 Page 2-18: This paragraph still does not read correctly. It reads as if BLM definitively knows the source of water from dewatering simply based on the geographical configuration of the pit. BLM must amend this paragraph to clarify that dewatering wells are sited in and water is extracted from these wells in both Kobeh and Diamond Valleys. However, the water modeling shows that water flowing to the pit also comes from Pine Valley. Therefore, the locations of the extraction wells are not necessarily coincident with the origins of the water flowing into the pit. The EIS needs to make very clear that some of the water flowing into the pit originates in Pine Valley.
Disposition: Other (SEE RESPONSE)

Response

The description of pit dewatering in the FEIS is consistent with commonly used water supply descriptions. For example, some ground water flows between Kobeh Valley and Diamond Valley, yet acceptable practice is to state that wells in Diamond Valley derive water from that basin although the "origins" of that water may be in another basin. Refer to Sections 3.2 and 3.3 in the FEIS for additional details regarding water resources. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 43

2.1.2.2 Page 2-23: No changes occurred based on our previous comments about this paragraph in the ADEIS. The paragraph reads as if the pit area will be totally dewatered before mining takes place. Insert "and during" to read "EML would conduct dewatering in advance of and during mining and the..."
Disposition: Factual correction made (SEE RESPONSE)

Response

The first sentence in the second paragraph of Section 2.1.2.2 in the FEIS has been deleted and replaced with the following text, "Active mine dewatering may not be initiated for several years as inflows during this period may be quite small. Dewatering would proceed throughout mining to ensure that mining would not be negatively affected by groundwater inflows. Pit inflows would be managed by in-pit sumps exacavated on an as-needed basis."

Letter 803, Comment 44

2.1.3 Page 2-23: Using more than one significant digit by reporting "0.45 billion tons" underscores how reporting of 2 or 3 significant digits for such large amounts is important. For consistency, 2 or 3 significant digits should be used in all reporting of amounts in billions since each increased usage of one significant digit is ten million pounds—a very large amount that should be disclosed. See previous comment from pg. 2-4 regarding same issue where BLM's previous response was that only 1 significant digit is used but makes little sense and is arbitrary. Also, please review BLM response to previous ADEIS comment 1544 to understand why it is important to include more than one significant digit when reporting such massive amounts.
Disposition: Other (SEE RESPONSE)

Response
It is standard scientific practice to use a specific number of significant digits depending on the accuracy of the data reported; therefore, uniformity throughout the EIS is not required. Additionally, the BLM has determined that the accuracy of the figures in the FEIS is appropriate for the level of analysis.

Letter 803, Comment 45

2.1.3.1.2 Page 2-24: Is the quality of the water flowing from the spring through the foundation drain into a natural drainage going to be impacted by contact with the non-PAG? We do not see anything describing that this analysis was completed. Please include.
Disposition: Comment acknowledged; does not provide new information

Response
CC-027-Spring Drain

Letter 803, Comment 46

2.1.3.2.2 Page 2-36: We are concerned with the possibility of waste rock being segregated primarily based on model predictions. Statements and commitments must be made by both BLM and EML that management of waste rock will always err on the side of caution and every step taken to ensure that PAG is properly managed according to extremely tight confidence intervals on real data—not primarily on modeling. Please revise to commit that waste rock segregation be based primarily on continued collection of the waste rock characteristics and only supplemented by model predictions. There should be no short-cuts taken when handling waste rock that could be PAG.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-074-Visual Inspections of Waste Rock

Letter 803, Comment 47

2.1.5 Page 2-37: Sentence reads "…depending on mill grade and mineralogy." Mineralogy is the study of minerals and should have no bearing on recent Mo recovery. Change "mineralogy" to "mineral characteristics" or something similar.
Disposition: Factual correction made (SEE RESPONSE)

Response
The third sentence in the third paragraph in Section 2.1.5 in the FEIS has been revised to read, "...depending on mill feed grade and mineral characteristics."

Letter 803, Comment 48

2.1.5.5 Page 2-42: The DEIS does not indicate that the slag will undergo any characterization or testing, and as a result, the DEIS does not adequately analyze the potential impacts of disposing of incorrectly characterized waste in a Class III landfill.
Disposition: Factual correction made (SEE RESPONSE)

Response
The following text has been added to the last paragraph in Section 2.1.5 in the FEIS, "Prior to disposal in a Class III landfill, EML would characterize the slag, as required by applicable NDEP and EPA regulations."

Letter 803, Comment 49

2.1.6 Page 2-45: Change sentence from "The North TSF would be constructed before the South TSF…" to "Construction of the North TSF would begin before the South TSF…" The way it reads now is that the N TSF would reach capacity (fully constructed) before the S TSF reaches full capacity.
Disposition: Other (SEE RESPONSE)

Response
The DEIS correctly states that the North TSF would be constructed prior to the South TSF reaching full capcacity. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 50

2.1.6 Page 2-45: We believe permeability should read "1 x 10-6" rather than just 10-6 (or 10-7).
Disposition: Factual correction made (SEE RESPONSE)

Response
The text in Section 2.1.6 of the FEIS has been revised to read "1 x 10-6" to be consistent with other values in this section.

Letter 803, Comment 51

2.1.6 Page 2-45: This paragraph should give the final factors of safety that were a result of the stability analyses. The paragraph outlines when a facility is considered stable (i.e., > 1) but then falls short in disclosing what the final computed values were.
Disposition: Already addressed in planning documents

Response

Appendix 2 of the Plan of Operations provides the stability analyses. This level of detail is not required to analyze the impacts from the Project. Details regarding engineering design are available in the Plan of Operations, which is available for review at the Battle Mountain BLM office. No changes have been made in the FEIS in response to this comment.

Letter 803, Comment 52

2.1.7.2 Page 2-55: The statement that the Machacek Substation is "located approximately 2.5 miles from the Town of Eureka" is incorrect. The Machacek Substation is located less than 0.5 miles north of the current Eureka Townsite boundary.
Disposition: Factual correction made (SEE RESPONSE)

Response

The third sentence in Section 2.1.7.2 in the FEIS has been revised to read as follows, "The proposed powerline would originate at Mt. Wheeler's Machacek Substation, located approximately 0.5 mile north of the Eureka Townsite boundary."

Letter 803, Comment 53

2.1.7.6 Page 2-59: In addition to wild horses, it needs to be clearly stated what would be done if cattle enter the project area. We proposed on both previous ADEIS that it be required that EML contact and coordinate with cattle owners to remove the cattle and ensured that cattle are not harassed.
Disposition: Factual correction made (SEE RESPONSE)

Response

Section 2.1.7.6 of the FEIS has been revised to include the following text, "In the event that cattle enter the fenced area, EML would attempt to identify the brand and contact the owner. If the brand could not be identified, EML would notify grazing permittees adjacent to the project. EML would assist in moving these animals out of the fenced portion of the proposed Project Area and would not harass these animals."

Letter 803, Comment 54

2.1.9 Page 2-60: Our position has not changed since we commented on this on both previous ADEIS. If EML is unwilling to commit to work with locals and NDOT on determining if a wash station is needed, the BLM should require it as a mitigation measure. Leaving it totally up to EML to "determine the need for a vehicle wash" in order to minimize mud tracked onto the highway may end in another situation where local concerns and needs are at odds with what EML is willing to do. Please consider the number of complaints that currently are provided by locals with regards to the dirt/mud tracked onto Hwy 50 from the Ruby Hill mine road. Locals don't appreciate the chipped windows and vehicle mud splatters that occur at these locations where traffic travels at 70 mph. This should be avoided at the Mt. Hope access to SR 278.
Disposition: Other (SEE RESPONSE)

Response

Section 2.1.9 of the EIS has been revised to include the following text, "EML would install a vehicle wash to reduce the amount of mud and dirt that would be tracked onto Highway 278 if, in cooperation with Eureka County, area residents and Nevada Department of Transportation, if it is determined to be necessary."

Letter 803, Comment 55

2.1.10 Page 2-60: EML needs to have the agreements with Eureka County fire and EMS well before the ROD is issued and construction commences. The fact that EML has not yet pursued these agreements is of concern to Eureka County, and BLM should also be aware that no agreements are in place and call for this to take place before the ROD.
Disposition: Factual correction made (SEE RESPONSE)

Response

The sentence that reads, "EML would have agreements with the Eureka County Fire and Ambulance Service to provide assistance" has been revised in the FEIS to read as follows, "EML intends to have agreements with the Eureka County Fire and Ambulance Service regarding mutual assistance, and has initiated discussions with this entity regarding emergency response cooperation."

Letter 803, Comment 56

2.1.11 Page 2-60: This section is supposed to speak of chemical use and management but fails to report use of chemicals that will not be stored on site. For example, there is no mention of pesticides for weed and or rodent control. These chemicals must be included.
Disposition: Other (SEE RESPONSE)

Response
The specific chemicals that may be used for weed or rodent control have not been determined, as they are selected based on need, and these needs have not been determined. Section 2.1.11 of the EIS lists specific chemicals and also explains that small amounts of other potentially hazardous materials will be periodically located on-site. This section further states that these materials will be stored in accordance with applicable regulations and safe practices.

Letter 803, Comment 57

2.1.11.1 Page 2-61: Although we understand that pesticides will not be stored on site, there will be use and transport of pesticides to the project area and possibilities of contractors needing to store these pesticides on-site for a few days as multi-day weed spraying contracts are carried out. This needs to be disclosed.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-085-Preventive Weed Control Mitigation

Letter 803, Comment 58

2.1.11.3 Page 2-63: Previous ADEIS spoke to disposal of office trash at the Eureka landfill, although we understand that this is no longer in the Plan. Eureka County has implemented a recycling program and we appreciate that the EML office in Eureka currently participates in our program. We ask BLM to require incorporation of the facilities at the mine site in our recycling program rather than simply allowing disposal of trash that is accepted for recycling into a landfill.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
This request is outside the scope of the NEPA document and outside the scope of BLM authority. No change in the FEIS has been made in response to this comment.

Letter 803, Comment 59

2.1.13 Page 2-65: BLM previously committed to adding a column to the table to include the peak labor force which according to the baseline analyses will be over 600 people. The column that speaks of the average labor personnel requirements during construction fails to take into account the construction workers themselves. The DEIS baseline studies estimate peak populations directly tied to the mine during the construction phase to be roughly 1000 people--a huge discrepancy from what is reported in Table 2.1-6. At a minimum, the table should match the description in the paragraph on pg. 2-64 and include the construction work force "of 615 personnel."
Disposition: Other (SEE RESPONSE)

Response
The Plan of Operations states the maximum number of anticipated construction personnel, and Table 2.1-6 in the EIS depicts the number of operations employees by work area. See Figures 3.17.2 and 3.17.3, for further details regarding the personnel requirements. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 60

2.1.14 Page 2-65: Please add an Operational Performance Standard that requires re-establishment of vegetation in areas where water pumping has created phreatophyte die-off and increased surfaces for wind erosion and subsequent fugitive dust. Currently, there is only a commitment for directly disturbed areas, and fugitive dust control in the wellfield is not even addressed.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020- Impacts to Phreatophytes

Letter 803, Comment 61

2.1.14.4 Page 2-66: Define stakeholders in the context of the water resources monitoring plan.
Disposition: Factual correction made (SEE RESPONSE)

Response
Section 2.1.14.4 of the FEIS has been revised to include the following text, "For the purposes of this section, stakeholders are defined as agencies with regulatory authority and parties with an interest in technical evaluation of the proposed operations. EML recognizes that this could potentially encompass a large number of parties, and is committed to making ongoing evaluations available for public review within the constraints of efficient completion of such updates."

Letter 803, Comment 62

2.1.14.7 Page 2-68: The bulk of weed control in the County on public and private land is accomplished through the County Department of Natural Resources and the Diamond Valley Weed Control District in coordination with the BLM on public land. Eureka County and the Weed District must be coordinated with and included as part of the weed monitoring and control plan. Please make this clear.
Disposition: Factual correction made (SEE RESPONSE)

Response

Section 2.2 of the Noxious Weed Plan, which is included as Appendix 13 of the Plan of Operations, has been modified to read "Coordination with the BLM, Eureka County Natural Resources/Diamond Valley Weed Control District, and others that are active in weed control/management...". No change has been made to the FEIS in response to this comment.

Letter 803, Comment 63

2.1.15 Page 2-70: Based on our previous comments, Section 2.1.15 must be re-written to commit these measures into the ROD, not develop them "subsequent to the ROD." The text should be revised to ensure that the underlined words are retained:
In addition to the monitoring requirements consistent with 43 CFR 3809.401(b)(4) and mitigation specified in the EIS for water resources, an advisory committee will be established, consistent with the requirements in FLPMA (43 USC 1712(c)(9)) and 43 CFR 1610.3-1(4), of "other Federal departments and agencies and of the States and local governments within which the lands are located" and "involvement of other Federal agencies, State and local government officials, both elected and appointed." This committee will include Eureka County.
The advisory committee will review and approve the water-related monitoring protocols, data, and reports, meet no less frequently than quarterly, and make recommendations to the BLM on operational changes or compliance issues.
The advisory committee will be established in the Record of Decision and be incorporated in Plan of Operations Approval.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-061-Mitigation Advisory Committee

Letter 803, Comment 64

2.1.16 Page 2-71: Language should be included to make it clear that adequate funding would also need to be in place for continued monitoring far into the future, especially related to water resources and the centuries of potential impacts after mining and reclamation.
Disposition: Factual correction made (SEE RESPONSE)

Response

A new fourth order sub-heading has been added after the second paragraph in Section 2.1.16. This new sub-section is titled, "Post-Closure Monitoring and Maintenance" and reads as follows, "EML would create a Long-term Funding Mechanism (LTFM) for the BLM to assure completion of long-term post-closure monitoring and mitigation obligations (after reclamation and financial guarantee release) of EML for the Project. The LTFM would be reviewed annually during the operation phase of the Project and potentially increased to meet the monitoring and mitigation needs associated with the Project. There is a potential for additional monitoring and maintenance tasks to be required beyond the 30-year post-closure timeline that is currently included in the reclamation cost estimate. Financial assurance for these tasks would be provided outside of the reclamation bond by means of a LTFM. The specifics of the LTFM and the amount of the assurance needed would be determined in cooperation with the BLM. The tasks to be covered by the LTFM include the following: maintenance of pit perimeter fencing; water quality monitoring of the pit lake, draindown from the PAG WRDF and draindown from the TSFs; and maintenance of ET cells that would be constructed to manage long-term draindown from the TSF. Treatment of the pit lake water, the PAG WRDF draindown, or the TSF draindown are not included because studies have indicated that there is no potential for any of these solutions to degrade water quality or otherwise present an environmental risk. Monitoring during operations and the 30-year closure period would be covered in the reclamation bond, and if information collected during this period indicates the need, the LTFM would be adjusted to include treatment. Maintenance of ET cells that would be constructed to manage long-term draindown from the TSFs could include replacing the backfill. However, the ET cells would be designed simply to provide containment of draindown solution as it evaporates and backfill that would function as growth media for vegetation. Over long time periods, salts in the draindown solution that precipitate within the backfill could completely occupy the media pore space, affecting the viability of vegetation. The ET cells would continue to provide containment by means of its synthetic liner, and solution draindowns would decrease over time, reducing the amount of solution volume that would need to be contained. However, as a conservative measure, costs for ET cell maintenance would be included in the LTFM established as part of this Project. As stated previously, the maintenance specifics and costs would be determined in cooperation with the BLM."

Letter 803, Comment 65

2.1.16.2 Page 2-71: Please add language to address re-vegetation in areas where water pumping has created phreatophyte, riparian vegetation, or salt-desert shrubland vegetation shifts or die-offs. Currently, there is only discussion for directly disturbed areas. Re-vegetation (including weed control) related to wellfield pumping is not adequately addressed or incorporated. Currently, neither the

Proposed Action nor mitigation measures in the EIS include analysis and discussion on what seed mixes, soil amendments, nor reclamation measures would be successful in re-vegetating these areas.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020- Impacts to Phreatophytes

Letter 803, Comment 66

2.1.16.4 Page 2-75: Neither the text nor tables 2.1-8 and 2.1-9 describe what would be required for re-vegetation in salt desert shrub soils, the possible impacts on these ecological sites, nor the BLM seed mix that would be needed for these sites. Regardless of indirect impacts of wellfield pumping to vegetation in these areas, the Proposed Action will result in direct disturbance to these salt-desert shrub areas in the powerline ROW and the wellfield corridor. None of the seed mixes will work in these areas. The tables only describe seed mixes according to elevation, not ecological site. Many, if not the bulk, of the proposed plant seeds in the Tables would not, or cannot, grow in the soils and conditions of these sites. The EIS should include analysis and discussion on the specific seed mixes, soil amendments, and reclamation measures necessary to successfully re-vegetate these salt-desert shrubland areas.
Disposition: Already addressed in planning documents

Response

The seed mix in Table 2.1-9 of the EIS includes a number of species (such as fourwing saltbush and spiny hopsage) that are considered successful in revegetation seed mixes for salt desert scrub vegetation communities. As stated in the EIS in Section 2.1.16.2, "The proposed seed mixture and application rates would be subject to modification by the BLM. The actual seed mixture and application rates would be determined prior to seeding based on the results of reclamation in other areas of the mine, concurrent reclamation, revegetation test plots, or changes by the BLM in its seed mixture requirements."

Letter 803, Comment 67

2.1.16.5 Page 2-76: Text states, "where feasible, large constructed topographic features such as the WRDFs and TSFs may (emphasis added) have rounded crests and variable slope angles to resemble natural landforms." One of the stated BLM goals is to "mimic surrounding regional landscape vegetation and non-vegetative component patterns" (2.1.16.4, p 2-072). The area between Garden Pass and Diamond Valley is considered to be visual Class III. In addition, portions of the Project Area are Class II due to the presence of the Pony Express trail. It states on p 3-557 that "The Proposed Action is not consistent with the visual Class II threshold associated with the Pony Express trail." The reclaimed non-PAG WRDF (p 3-309, Fig 3.7.3d) shows very little attempt to fulfill BLM goals for reclamation even for a Class III designation. Section 2.1.16.5 should include stronger language to require mitigation of visual impacts after mining is completed to the maximum extent possible. Please change the "may" to "will."
Disposition: Other (SEE RESPONSE)

Response

Figure 3.7.3d in the EIS is merely a simulation and cannot be expected to capture all the details or subtleties of the proposed reclamation. The BLM considered visual values and made sure that reasonable attempts to meet the VRM objectives and minimize the visual impacts were incorporated into the Project design as part of reclamation. As part of reclamation, long-term visual effects of the Project would be minimized through recontouring and revegetation (Section 2.1.16.5).

Additionally, the assignment of visual resource management classes is ultimately based on management decisions made in RMPs. Inventory classes are informational in nature and provide the basis for considering visual values in the RMP process. They do not establish management direction and should not be used as a basis for constraining or limiting surface disturbing activities.

Letter 803, Comment 68

2.1.16.6.3 Page 2-79: We cannot discern what the white area inside the pit depicts on Figure 2.1.18. Please clarify.
Disposition: Other (SEE RESPONSE)

Response

Figure 2.1.18 illustrates the post mining topography (year 80 and beyond). As indicated in the figure's explanation, the white area inside the pit is a depiction of private property. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 69

2.1.16.8.4 Page 2-84: Please add language to acknowledge that there may be options for avoiding the waste of water in 44 years associated with TSF draindown such as the potential for filtering and/or reinjection of TSF fluids, if the technology exists. This is a tremendous amount of water that should be salvaged if possible.
Disposition: Factual correction made (SEE RESPONSE)

Response

The FEIS has been revised to include the following sentence at the end of the last paragraph in Section 2.1.16.8.4, "EML would explore and evaluate the technical and regulatory feasibility of recycling, injecting, discharging, or otherwise using the water stored in the tailings pond at the end of the Project life to prevent the potential waste of this resource, as opposed to disposal by evaporation."

Letter 803, Comment 70

2.1.16.9 Page 2-85: If the growth media applied onto the TSF (and possibly the WRDFs) is to be only 12 inches deep, the feasible vegetation options will be limited. This holds especially true for the TSFs that after draindown become hard and crusted. This may inhibit the penetration and expansion of roots past the top 12 inches of topsoil. Also, most shrubs (and other woody species), including sagebrush and bitterbrush, have long taproots that are critical to their vigor and these species may not be able to survive or thrive due to shallow topsoil conditions. Please acknowledge this and make it clear that reclamation may result in vegetative communities that may be able to support only limited or no, shrub and woodland species.
Disposition: Other (SEE RESPONSE)

Response

Industry experience indicates that a layer of growth media as thin as a few inches will provide conditions conducive to seed germination and successful revegetation. Nevada typically has thin or poorly developed soils and the native species have evolved to thrive in these conditions. However, the TSF is an engineered design and 12 inches of material will be used to construct the soil liner containment underneath the TSF. As stated in section 2.1.16.8.3, the TSF surface will be nearly flat to create an artificial playa and will be covered with an 18-inch layer of growth media. The remaining tailings impoundment surfaces (outside of the playa footprint) would be covered with a 24-inch layer of growth media placed on a stabilized tailings surface. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 71

2.1.16.14 Page 2-86: Please add "and Natural Resources and Federal or State Land Use Plan" so it would now read "…conformance with Eureka County's Economic Development Plan and Natural Resources and Federal or State Land Use Plan."
Disposition: Other (SEE RESPONSE)

Response

The text in the DEIS acknowledges conformance with applicable regulations and authorities; therefore, no change has been made in the FEIS in response to this comment.

Letter 803, Comment 72

2.2 Page 2-90: We are not clear on how water rights would constrain "a number of the proposed facilities." Water rights in Nevada have the ability to be used anywhere, including in a basin separated from where the water is extracted. The only constraint is where EML was (and is) willing to designate specific points of diversion and place of use. Remove "water rights." If BLM is going to keep "water rights" in, then BLM should require that pumping take place at the original location of the original agricultural rights (Bobcat Ranch, Bartine Ranch, Bean Flat) if the location of water rights is a constraint.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in Section 2.2 of the FEIS has been revised to delete "and water rights".

Letter 803, Comment 73

2.2.2 Page 2-91: Please change sentence that reads "Figure 2.2.1 shows configuration … reclamation were completed" to "…would be completed."
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in Section 2.2.2 of the FEIS has been revised to read as follows, "Figure 2.2.1 shows the configuration of the Project following the completion of the backfilling and reclamation."

Letter 803, Comment 74

2.2.4 Page 2-92: The sentence that states that "the level of disturbance would be greater" under the Slower, Longer Alternative is inaccurate and misleading. "Level of disturbance" is a combination of scope, scale, timing, duration, and rate. The level of disturbance on a day-to-day basis would, in fact, be less because the rate of disturbance would be cut in half. This alternative itself was improperly analyzed because there was a failure to address issues other than duration such as scope, scale, and rate. Much of this language related to the analysis of the Slower, Longer Alternative speaks to purchase or ordering of equipment by EML, economies of scale, lead times, etc. that should have no bearing on an adequate review and analysis of a reasonable range of alternatives. The EIS speaks to impacts and should not speak to ordering or design of equipment by EML. The basis of discussion in these two paragraphs would preclude any alternative analysis strictly due to the fact that a proponent has stepped out and already ordered equipment. This analysis

focuses on what the proponent would like, not what could reduce impacts of the Project. Reliance on this arbitrary reasoning is not appropriate; taken to its logical extreme, any proposal that has economics different from the applicant's would be considered in a negative light and not objectively analyzed. Of note, in the BLM NEPA Handbook (H-1790-1) it states that "[i]n determining the alternatives to be considered, the emphasis is on what is 'reasonable' rather than on whether the proponent or applicant likes or is itself capable of implementing an alternative. 'Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant' (Question 2a, CEQ, Forty Most Asked Questions Concerning CEQ's NEPA Regulations, March 23, 1981)'" (BLM NEPA Handbook p. 50). This section sets the tone for the rest of the document in which there is a general disregard of any alternative different from the Proposed Action. This language underscores the fact that BLM has no intentions of doing anything counter to what EML wants. Please revise to account for more thorough and objective analyses of the truly relevant and correlative factors related to total potential impacts of this alternative. This must give proper weight to the day-to-day impacts that would be unquestionably less.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-046- Slower, Longer Alternative Analysis

Letter 803, Comment 75

2.2.4 Page 2-95: The EIS should disclose how BLM determined that there would be more water evaporation on a per unit basis. The current statements are not grounded in logic nor are they justified by data.
Disposition: Factual correction made (SEE RESPONSE)

Response

The following text in the FEIS has been included in Section 2.2.4 as follows, "... on a per unit basis than under the Proposed Action, because the open water in the tailings pond would exist for twice as long during the processing of the same amount of ore. Therefore, this alternative would likely result in twice as much evaporation.)"

Letter 803, Comment 76

2.2.4 Page 2-95: Focusing on tax revenues (increase or decrease) does not get to the heart of what local residents want to see—socioeconomic stability for the entire region. The bulk of residents are already comfortable with the services that the County provides and at this time, the Mt. Hope Project is not needed (or wanted by some). Include language to make it clear that socioeconomic stability of the region can benefit more from an extended project. The County is willing to sacrifice more tax revenues in order to create longer term stability for residents and local businesses. Include language to point out that although profit and tax revenues would be reduced, there would be more long-term economic stability and less social disruption since the Project would last much longer.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-002-Socioeconomics General Disruption

Letter 803, Comment 77

2.2.4 Page 2-95: The qualifier of "albeit at half the rate" does not give enough weight to the lessening of day-to-day impacts that would occur over the life of the project. Yes, some impacts will remain the same overall, but the line of reasoning outlined in this section would also justify doubling the rate and reducing the Project's life by half because the exact same statement could apply with a qualifier of "albeit at twice the rate". Impacts should be analyzed according to overall impacts (which may be the same as the proposed action) and the extent of impacts on a day-to-day or year-to-year basis (which would be less than the proposed action). There is a trade-off.
Disposition: Other (SEE RESPONSE)

Response

Individual impacts are analyzed and discussed in Chapter 3 of the FEIS. The impacts from the Proposed Action are not analyzed on a day-to-day basis but on an overall basis; therefore, the approach taken in the analysis of the Slower, Longer Project Alternative in Chapter 3 is consistent with the analyses of the other alternatives.

Letter 803, Comment 78

2.2.5.2 Page 2-96: The analysis for Different WRDF Heights Alternative should acknowledge that many of the increased impacts described in the DEIS are only temporary, but overall the impacts may be positive. For example, the reclaimed WRDFs would create more forage for wildlife, more surface area for vegetation and soil stability. Further, slopes would not be as steep if the heights were lower, thereby decreasing the possibility of long term soil erosion.
Disposition: Other (SEE RESPONSE)

Response

Section 2.2.5.2 is not an analysis of this alternative, it is an explanation of why it was eliminated from further consideration. As the section explains, "This alternative would increase the amount of surface disturbance and, therefore, the impacts to vegetation, wildlife, and soils, as well as increasing air emissions, due to the increased time frames for mining and longer haul distances during the life of the Project. This alternative would decrease, but not substantially reduce, the impacts to the Pony Express Historic Trail setting in comparison with the Proposed Action. For these reasons, the Different Waste Rock Disposal Facilities Height Alternative does not meet the criteria under Section 2.2 and has been eliminated from detailed consideration."

Letter 803, Comment 79

2.2.5.8 Page 2-99: Given the recent guidance regarding sage grouse, the Different Powerline Alternative should be given higher weight and brought forward for analysis. The language that has been inserted of being "technically infeasible" is not accurate. The tie-in to the 345-kV line may be temporarily disruptive to service, but not infeasible. Many management decisions regarding sage grouse will prove to be inconvenient at times. The decision to not carry the Different Powerline Alternative forward is not justified by the current explanation since there are compelling environmental advantages to lessen impacts to sage grouse. For example, less vertical structures mean less raptor perching and less sage grouse predation. We do not wish to see more power lines going up when they may be unnecessary especially regarding the impacts to sage grouse.
Disposition: Comment acknowledged; does not provide new information

Response

As the operator of the Falcon-Gondor powerline, NV Energy determined this alternative to be infeasible. The powerline associated with the Proposed Action would be located within the Falcon-Gondor corridor and would be constructed in compliance with greater sage-grouse conservation measures included as Appendix C, Attachment 3 in the FEIS. These conservation measures were developed in coordination with the NDOW to comply with the most recent policy guidance regarding greater sage-grouse.

Letter 803, Comment 80

2.3 Page 2-100: Eureka County could come to consensus with BLM and EML on the Proposed Action as the preferred alternative if we believed the committed mitigation measures in the Proposed Action and outlined in the DEIS were adequate. Before moving forward on the FEIS or drafting of the ROD, we strongly urge BLM to seriously work with us to take our concerns and comments into account and implement the necessary changes and mitigation measures that Eureka County can support. We are concerned that BLM moved forward with a preferred alternative without engaging Eureka County, as a Cooperating Agency, in any discussions regarding consensus on the preferred alternative as required according to the BLM NEPA Handbook (Section 9.2.7.3).
Disposition: Comment acknowledged; does not provide new information

Response

The BLM is required to identify a preferred alternative in the EIS (40 CFR 1502.14). As stated in the BLM's "A Desk Guide to Cooperation Agency Relationships and Coordination with Intergovernmental Partners" dated 2012, "Does a CA relationship require the BLM and the cooperators to make decisions by consensus? No. Consensus may not always be achievable or consistent with the BLM's legal obligations or policy decisions. However, the DOI's NEPA regulations at 43 CFR 46.110(c) require that the Responsible Official must, whenever practicable, use a consensus-based management approach to the NEPA process." BLM policies require a collaborative process and the BLM has included Eureka County in a collaborative process and in substantial discussions. Many changes in the environmental analysis, the mitigation measures, and the Proposed Action have been made as a result of the collaborative process with Eureka County. BLM's policies do not require that the BLM reach a consensus with cooperating agencies on the preferred alternative. Collaboration mandates methods, not outcomes. It brings diverse parties together to seek broadly acceptable solutions to (what are usually) complex problems. It does not guarantee the parties will achieve consensus, and the BLM remains the final decision maker on matters within its jurisdiction. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 81

Water related impacts to many resources, including Roberts Mountain, may be greatly reduced or avoided simply by siting the wellfield in a different location. As we have previously highlighted and requested, there needs to be analysis to account for the alternative of all wellfield water being supplied from wells sited in phreatophyte areas on the Kobeh Valley floor. Given the fact that phreatophyte decline (and eventual loss) is an unavoidable impact and under Nevada water law must occur, drawing directly from this water source would limit the drawdown area and many ancillary impacts to arguably higher value resources on Roberts Mountain and the alluvial fans. We believe siting the wellfield in the phreatophytes will greatly reduce the range of potential impacts and will serve as mitigation itself in a way to avoid some impacts altogether. Further, more detail could be provided and resources committed to address the more narrow range of impacts that could occur in primarily just the phreatophyte areas. Please adequately analyze this scenario in order for all stakeholders to weigh the trade-offs and make a reasoned choice on locations for wellfield pumping.
Disposition: Comment acknowledged; does not provide new information

Response

The Proposed Action provides for modification to the wellfield to minimize impacts (see Section 2.1.2 of the EIS and Mitigation Measure 3.2.3.3-3b of the EIS). No changes have been made to the FEIS as a result of this comment.

Letter 803, Comment 82

3.2.1 Page 3-3: Public Water Reserves 107 (PWR) do not belong under "Regulatory Framework." PWRs are not regulations and carry no elevated status above other water rights. This section is sufficient in describing the regulatory framework and jurisdiction without discussion of PWRs. PWRs still fall under state jurisdiction and regulatory authority and are no more a valid water right than any other water right. All discussions of PWRs should fall under water rights sections later on.
Disposition: Factual correction made (SEE RESPONSE)

Response

In response to the comment, the paragraph discussing Public Water Reserve No. 107 has been moved from Section 3.2.1 to the discussion of "Water Rights" in Section 3.2.2.7.

Letter 803, Comment 83

3.2.1 Page 3-3: Responses to previous ADEIS comment 597 and 1663 are incorrect. All of section 3.2 deals with water quantity. There is no federal jurisdiction over water regulation, appropriation, or preservation with regard to water quantity (only federal jurisdiction over water quality). Just because there is a federal connection through EO PWR 107 doesn't translate to federal jurisdiction. See the recent Owyhee River Basin Adjudication which underscores this fact. We suggest BLM change the sentence to read "...in Nevada falls under state jurisdiction."
Disposition: Comment acknowledged; does not provide new information

Response

The comment is correct that the Nevada State Engineer has jurisdiction over appropriation of water rights in Nevada. That is clear from the text of the EIS in many places and no change in the particular text referenced by this comment has been made.

Letter 803, Comment 84

3.2.2.2.1 Page 3-7: This paragraph is not entirely correct as surface drainage from Garden Valley seldom, if ever, makes its way to the Humboldt River. It flows towards the River, but is infiltrated, evaporated, or used before it ever reaches the Humboldt.
Disposition: Already addressed in planning documents

Response

The use of the word "drain" rather than "flows" was chosen because of this condition. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 85

3.2.2.2.3 Page 3-9: BLM still continues to not include all known springs and wells, regardless of the data set used, and fails to recognize and disclose the full range of impacts. It is of concern that BLM continue to omit these water sources especially since we specifically pointed these out to BLM two years ago and they should have easily been included. The individuals that own these water rights wish to have them included so that they can weigh the impacts upon their private property and business operations. Given that omitted Gravel Pit Spring is a PWR 107 further undermines the ability of the BLM to evaluate the impacts on public resources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-033-Data Adequacy

Letter 803, Comment 86

3.2.2.2.3 Page 3-21: The table still omits many weather stations within 60 miles of the Project Area including at least 3 RAWS sites, the Diamond Peak snotel site, and the Diamond Valley agrimet site. Please include these into the analysis.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-033-Data Adequacy

Letter 803, Comment 87

3.2.2.3 Page 3-22: As previously requested, please include Roberts Creek in the table. BLM's response to our previous comments did not give an adequate reason why Roberts Creek was omitted but simply said "refer to comment 370" which had nothing to do with adding Roberts Creek. Additionally, one measurement taken in 2007 or 1964 does not support the conclusions drawn about Roberts Creek or any of the other creeks in all of the basins reported. For example consider the statement "more recent estimates…in Coils Creek have not been found." More recent data exists from the USGS gaging station on Coils Creek with GOES real-time telemetry. In fact, the measurements given in the text are at odds with more recent measurements provided in Table 3.2-2. More recent data is available on many of these streams and creeks from EML themselves or USGS. Most recent data must be used in order to be defensible. Further, USGS data should be used and reported wherever available. In addition to the USGS installed gaging stations, they have been doing quarterly seepage and flow measurements since 2010 and all of this information is available on the NWIS

website. Please update text, tables, and analysis to give most recent flow reported by USGS on at least Roberts Creek, Coils Creek, Henderson Creek, Pete Hanson Creek and Tonkin Springs. Also, please refer to previous ADEIS comment 642 that did not receive a response. There is a statement that Pete Hanson Creek did not have flow in 2007. However, Pete Hanson Creek had to have some flow in August 2007. If not, how do the fish and particularly LCT continue to survive in this Creek?
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-033-Data Adequacy

Letter 803, Comment 88

3.2.2.3.1 Page 3-23: The 1983 and 1984 flows through Devil's Gate in Slough Creek were far larger than the 1964 figure reported and should be mentioned. Also, Slough Creek has a supplemental water right associated with it in Diamond Valley that must be taken into account.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-033-Data Adequacy

Letter 803, Comment 89

3.2.3.1.2 Page 3-36: The DEIS uses 10 feet of drawdown calculated via the groundwater flow model as the criterion to assess whether or not an impact to a particular water resource or water-dependent resource is predicted to occur. The rationale given in the DEIS for this 10-foot drawdown criterion is simply that it is a common metric applied to mining EISs in Nevada because it can be difficult to distinguish specific project-induced effects from natural variations unless the related changes in water level are greater than 10 feet. That statement might hold true for monitoring programs where sparse data are acquired at very low frequency, say quarterly. But, for comprehensive monitoring programs such as the one proposed for the Mt Hope Project where water levels in numerous widely disbursed monitoring wells and flow in select streams are to be measured continuously, experience has shown that a water-level change of less than a foot can often be tied to a particular pumping stress. Using the BLM's logic, if a monitoring program is specifically designed to help tease out the cause of water level changes of less than 10 feet, then a smaller drawdown criterion should be applicable. Eureka County has repeatedly proposed the use of five feet of predicted drawdown related to the project to provide a conservative approach for disclosing potential impacts instead of 10 feet. The primary reason is that small changes in water level can have a significant impact on spring flow and wet meadows. The fact that a small decline in water level can severely impact springs is clearly evidenced in Diamond Valley where as little as one to two feet of drawdown resulting from agricultural pumping has caused the flow of springs on the valley margins or near the playa to decline or cease altogether. At the "All Parties" meeting held at BLM in Battle Mountain in December 2010, the BLM's EIS contractor provided a response to the County's recommendation by explaining that the residual error of the groundwater flow model used to evaluate impacts to the groundwater regime was in the range of 10 feet and, therefore, did not justify using five feet of drawdown as a metric for predicting impacts.
We recognize that some areas of the Hydrologic Study Area incorporated into the model have significant uncertainty with respect to the properties of the geologic formations and general complexity, but we believe it is better to err on the side of caution by incorporating a 5 foot contour coupled with comprehensive monitoring. Eureka County's opinion of the inadequacy of the 10 feet drawdown contour to gauge potential impacts to spring sources is echoed by the EPA in their review of the DEIS of the Southern Nevada Water Authority's Clark, Lincoln and White Pine Counties Groundwater Development Project. The EPA concluded "…there is a need for evaluation of the effects of groundwater drawdown of less than 10 feet…" Partly for this reason, the EPA judged the SNWA DEIS to be "incomplete." The NDOW provided a very similar comment on their review of the SNWA DEIS. The same logic applied by EPA and NDOW in the SNWA DEIS will likely apply to this DEIS analysis. Consequently, Eureka County will continue to advocate for five feet of drawdown as a metric for disclosing potential impacts to springs and surface-water resources coupled with a monitoring, management and mitigation program grounded in scientific principals and consistent with regulatory constraints.
Additionally, the groundwater model incorporated in the DEIS was used to predict impacts to phreatophytes in Kobeh Valley and to assess the effect of the Project on hydrographic basin water budgets. By the end of active mining the model predicts a reduction of more than 4,000 AF/year of phreatophyte evapotranspiration (approximately 25% of the natural discharge by phreatophytes in Kobeh Valley) and this number is used to assess impacts to native vegetation and basin water budgets. Most of this impact to phreatophyte communities takes place where drawdown is less than 10 feet and yet, the DEIS places some stock in this assessment to evaluate the impact of the Project on the water budget for Kobeh Valley and potential impacts to phreatophytes. This begs the question, if less than 10 feet of drawdown allows for credible estimates of impacts to phreatophytes, why is less than 10 feet of drawdown not applicable to other water resources such as a spring and associated water-dependent resources such as wet meadows and riparian zones? Please adopt the maximum extent of the five foot drawdown contour predicted to be caused by the Project's groundwater pumping as the metric for assessing which water resources and water-dependent resources potentially will be impacted by the Project. If necessary, include a disclaimer that the prediction has uncertainty associated with it and clearly state 5 feet of drawdown was selected to disclose a conservative assessment of potential impacts.
Disposition: Comment acknowledged; does not provide new information

Response
CC-096-Ten-Foot Isopleth

Letter 803, Comment 90

3.2.2.6.2 Page 3-44: Please update text to describe the depths of these tests for all holes and wells tested. Depths are reported only for hole 248. Eureka County, as a cooperating agency, was not provided a copy of these test results and we are concerned whether the tests were carried out at all depths necessary to adequately determine impacts related to dewatering (especially as the pit gets deeper). There is no way to determine this from the current text and it isn't clear to us what conclusions BLM can draw from the analysis.
Disposition: Comment acknowledged; does not provide new information

Response

The specific information requested in this comment is located in the baseline data report cited in the FEIS, which are available for review at the BLM Battle Mountain Office and are included in the administrative record for this project.

Letter 803, Comment 91

3.2.2.6.2 Page 3-46: The statement "The extent of the outcrop area of these rocks generally does not indicate the full extent of the intrusive body in the subsurface" also applies to every other hydrolithologic units including the carbonates. For consistency similar statements should be made following description of each unit type in this section. The current statement seems to be trying to set the stage to explain away any subsurface flow between valleys later in the document.
Disposition: Comment acknowledged; does not provide new information

Response

The nature of the implacement of intrusive rocks results in highly irregular configurations. This is very different from how sedimentary rocks are formed. As a result, the subsurface configuration of intrusive bodies are typically more unknown than other types of rock units. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 92

3.2.2.6.2 Page 3-46: BLM's response to our previous comment regarding lack of aquifer data in the southern portion of the wellfield did not get to the heart of the issue we brought up. It is true that the model predicts hydrologic properties, but the argument is not on what the model predicts but that real, on-the-ground data and aquifer testing is notably absent in the area of the south wellfield. More data should be collected in this area to support any results, including modeling predictions. No testing was done in the south portion of the wellfield. Data must be collected there, especially since pumping in this area would more quickly impact phreatophytes, springs that are already listed as potentially drying up (e.g. Lone Mtn. Spring and Mud Spring), and underground water rights (e.g., Risi and Garaventa rights at the Hay Ranch). Pinning down the aquifer properties in this area based on real data will have a great influence on the impacts analysis. Impacts to phreatophytes, springs, and water rights near the south wellfield cannot be adequately analyzed without knowing the hydrologic properties of the alluvium in this area. Eureka County has brought this issue up to BLM and EML multiple times over the past 4 years and there has been plenty of time to address it and get some real aquifer data collected in this area. In fact, the wells which have been drilled and tested, and whose impacts are easier to monitor and identify, make up only 44 percent of the proposed production, leaving 56 percent of the hydrogeology of the proposed production entirely unknown. This prevents the DEIS from properly analyzing the potential adverse impacts of the mine's groundwater withdrawals especially related to phreatophytes and springs located closer to the south end of the wellfield (e.g., Mud Spring, Lone Mountain Spring, Hay Ranch wet meadows).
Disposition: Comment acknowledged; does not provide new information

Response

The BLM used best available data. Required monitoring will continue to assess the extent of drawdown to verify the accuracy of the model and trigger mitigation as necessary.

Letter 803, Comment 93

3.2.2.6.5 Page 3-55 and 3-56: The last sentence of the first partial paragraph at the top of page 3-56 incorrectly states that the flow across the northern boundary of the HSA is approximately 3,100 afy. The correct value of the estimate (found in Montgomery, 2010) is 11,300 afy.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in the FEIS has been revised to correct this figure to read "11,300".

Letter 803, Comment 94

3.2.2.6.6 Page 3-56: The DEIS recognizes that Diamond Valley is the terminus of the Diamond Valley Regional Flow System; therefore, it should be unambiguous that interbasin flow occurs and that actions in one basin have the potential to impact resources in adjacent basins. An estimated 2,000 acre-feet per year of groundwater is calculated by the DEIS groundwater flow model to flow from Kobeh Valley to southern Diamond Valley. This equates to a significant proportion of the recharge to southern Diamond Valley, where groundwater is exploited by agriculture and other users. However, statements like " . . . major barriers to ground water flow in these areas of carbonate rocks" scattered through the DEIS tend to the down play the interconnection between Kobeh Valley and

Diamond Valley, and the potential for impacts to cross basin boundaries, and suggest a bias in favor of the Project. Every effort should be made for the DEIS to provide a fair and balanced assessment of the resources and potential impacts.
Disposition: Comment acknowledged; does not provide new information

Response

The text in Section 3.2.2.6.5 of the DEIS accurately presents the best available data on the groundwater flow within the hydrologic study area. No changes have been made in the FEIS to address this comment.

Letter 803, Comment 95

3.2.2.7 Page 3-57: The DEIS reports that "For the purpose of EIS analysis, all underground water rights and pending applications for underground water rights owned by EML or its subsidiaries were excluded from the assessment of potential impacts." To not disclose or address the potential impacts of pending applications for underground water rights in the DEIS severely discredits the validity of the document. We especially need to see these sources included given the fact that impacts to water rights currently controlled by EML will restrict the future viability of our long-term agricultural tax base, regardless of ownership. All impacts, regardless of water rights ownership, need to be disclosed in order for BLM, Eureka County, and the public to understand and weigh the full scope and scale of impacts related to the Project.
Disposition: Comment acknowledged; does not provide new information

Response

Information on pending and approved water rights applications are available from public records. The BLM excluded the pending and approved water rights of EML, the operator, from the analysis in the EIS because it is assumed that the company's own water rights would be "affected" by Project-related ground water pumping and EML recognizes this as part of their proposed Project. In addition, to include those rights in the impact analysis would artificially inflate the level of impact to users that do not otherwise have control over the activities that cause the impact.

Letter 803, Comment 96

3.2.2.7 Page 3-57: It is important to cite the Nevada Water Law statutes in order to weigh potential impacts on these rights and because vested rights and subsisting rights cannot be impaired. We request language to clarify, "NRS 533.085 states that 'nothing...shall impair the vested right of any person to the use of water' and NRS 533.495 states that 'subsisting rights not to be impaired.'"
Disposition: Comment acknowledged; does not provide new information

Response

The BLM does not agree that the EIS requires extensive citations of Nevada water laws. All water rights decisions must be made in the context of such laws and their administration by the Nevada State Engineer. No change has been made to the text of the EIS.

Letter 803, Comment 97

3.2.2.7 Page 3-57: BLM fails to acknowledge and disclose the impacts to many water rights by relying on a search of the NDWR database from over 2 years ago in Jan. 2010. This is inappropriate given the fact that many of the omitted water rights were specifically pointed out to BLM by Eureka County in both ADEISs. Please update the information on all potentially affected water rights and include at least 2 pending applications in Diamond Valley, 1 recently granted application at Frazier Creek in Garden Valley, and 2 pending applications at Bartine Ranch in Kobeh Valley. Figures also need to be updated to include these omitted applications.

Response

The BLM used the best data available at the time the baseline reports and DEIS were prepared. The inclusion of the newly granted right in Garden Valley, outside of the projected area of ground water affects, and the addition of newly applied for water rights, would not materially affect the environmental analysis. As noted in Section 3.2.2.7, approximately 1,000 water rights and water right applications for the inventoried area were collected from the NDWR database and tabulated in an appendix to the Montgomery et al. 2010. It is to be expected that as part of periodic ground water flow model updates, the database would be updated as additional applications are made or granted.
Disposition: Comment acknowledged; does not provide new information

Letter 803, Comment 98

3.2.2.7 Page 3-57: The DEIS only addresses potential impacts to springs located within the maximum extent of the 10 foot drawdown contour for which water rights are on file with the Nevada Division of Water Resources. But, on p. 3-57, the DEIS recognizes the likelihood that "Additional vested water rights and subsisting rights for stock water . . . could exist within the Project Area and within the ten-foot ground water drawdown contour." Furthermore, the DEIS downplays the fact that the Pete Hanson Creek decree incorporates the flow of all springs in the headwaters of Henderson Creek that contribute to the flow of the creek. No decrease in the flow of these springs adjudicated by the decree is permissible under Nevada water law. Yet, these vested spring rights are given short shrift in the DEIS despite the fact that five springs catalogued in the DEIS are located within the predicted maximum extent of the 10-foot drawdown contour resulting from Project pumping. The DEIS must address all water rights, whether they are permitted, certificated, decreed, vested, or subsisting, whether or not a claim has been filed. A loss or reduction in the resource of any one spring

will cause additional stress on the remaining resources by concentrating use at the remaining spring sources. Please revise to emphasize that spring sources within grazing allotments have vested rights and subsisting rights associated with them whether or not a claim has been filed with the office of the Nevada State Engineer (NSE). Clarify that there is no requirement under Nevada water law to file for these claims until the NSE calls for adjudication and a "taking of proofs" (see NRS 533.110 for more information). Again, please make it clear that impacts to all water sources whether they are pre-statutory (vested), permitted, certificated, or decreed will be fully mitigated. Table 3.2-6 should be modified to include all springs because all springs within grazing allotments are utilized by livestock, whether or not a claim of a vested right has been filed with the Nevada Division of Water Resources and that wildlife utilize these same sources and are guaranteed customary access and use of these waters as outlined in NRS 533.367.
Disposition: Comment acknowledged; does not provide new information

Response
CC-031-Impacts to Surface Water Quantity

Letter 803, Comment 99

3.2.3 Page 3-58: The DEIS presents a comprehensive program to monitor changes to groundwater and surface-water resources. The primary goal of this plan, which was incorporated into the Project's Plan of Operations, should be to foretell impacts before they become problematic, to initiate management decisions that might negate the need for mitigation, or to facilitate a response to changes (mitigation) before an adverse impact becomes irreversible. However, there are severe issues, even possible fatal flaws, associated with the proposed measures to mitigate adverse impacts to water resources. Furthermore, the proposed monitoring and mitigation process ignores the importance of management, which if initiated before impacts to sensitive receptors occur, may eliminate the need for costly mitigation which may take years to implement and be effective. Specific issues with the proposed mitigation processes are included in our subsequent comments.
Disposition: Comment acknowledged; does not provide new information

Response
The monitoring plan developed with cooperation and input from the BLM, the cooperating agencies, USFWS, and a group of Diamond Valley growers, and proposed by EML as a component of their Plan of Operations is adequate to determine impacts and provide advance indication of impacts. Numerous options are identified in the EIS to mitigate impacts should impacts be observed during monitoring. No change has been made to the EIS in response to this comment.

Letter 803, Comment 100

3.2.3.1.2 Page 3-63: We request that BLM insert similar language for consistency with 3.2.3.1.1 Surface Water Quantity. Add, "as defined by state law" after "use" to read "A long term consumptive use of a water resource that does not provide for a beneficial use, as defined by state law." Under Nevada water law, beneficial use is defined as the purpose for which the water is to be appropriated and has a very specific meaning.
Disposition: Comment acknowledged; does not provide new information

Response
The BLM agrees that the term "beneficial use" has a specific meaning under Nevada law. Reference to the statute is more correct than adopting the language proposed in the comment. Beneficial use is not just the purpose for which the water is to be appropriated. NRS 533.035 states that beneficial use shall be the basis, measure, and the limit of the right to use water. The reading of the term in the comment does not affect any analysis in the EIS.

Letter 803, Comment 101

3.2.3.1.2 Page 3-63: Since 56% of the proposed production wells have had no pump testing and there are no aquifer properties data in these areas, please explain how BLM determined the hydraulic connection in the significance criteria.
Disposition: Comment acknowledged; does not provide new information

Response
The BLM made a conservative assumption based on spatial overlap of the modeled ten-foot drawdown and the location of surface waters. This is explained in section 3.2.3.3.1 which states " ...it was conservatively assumed that all of the springs located in this area are interconnected with the regional groundwater system...".

Letter 803, Comment 102

3.2.3.2.1 Page 3-65: We previously pointed out that using 2009 as the steady state for the local model cannot be valid and sways the results. BLM responded that "although the pit is located on the hydrologic divide, pumping in Diamond Valley has not affected groundwater levels in the pit area, either on the Diamond Valley or the Kobeh Valley sides of the divide. Thus, 2009 groundwater levels closely represent steady-state conditions in the pit area." However, EML's own regional flow model (and testimony at the NDWR water rights hearing) shows pumping from Diamond Valley has affected this area. We question the ability of the local model to accurately and adequately consider the impacts of the project given the arbitrary steady state of 2009. Please revise the local model to provide for a reasonable steady state condition and more defensible conclusions.
Disposition: Comment acknowledged; does not provide new information

Response
CC-097-2009 Steady State Condition

Letter 803, Comment 103

3.2.3.2.2 Page 3-66: Many previous ADEIS comments were not properly addressed (see previous comment 1723). We do not agree with BLM's response to these previous comments from a scientific and common-sense standpoint. The modeling omitted multiple sources of pumping which taken separately may be minor, but cumulatively equate to high rates that should be accounted for. BLM's perfunctory response was that these additional sources "would be an insignificant amount relative to major water input to the model...there is uncertainty with regard to future pumping rates and such a change would not be expected to significantly alter the predicted impacts of the Proposed Action or other mining alternatives." On the first ADEIS, BLM responded (comment 736) by stating "if the model is going to be rerun anyway, it would be a good idea to update...per the comment". The model was rerun, yet not updated to take these other sources into account. The text was not even updated to explain why these sources were omitted. The sources that should be added include, but are not limited to: 1120 afa of water to be used by Wise Family Development, LLC in Kobeh Valley; Devil's Gate GID 1 and 2 wells which use just as much water as Eureka; hundreds of domestic wells in DV which combined equate to much more than the municipal uses; future municipal and domestic uses attributable to the Project related population growth; continuation of dewatering at Ruby Hill well past 2012 based on the recent Plan Amendment and Barrick's public disclosures; and the EML/EPC agreement that intends to retire water in Diamond Valley that will have bearing on when pumping rates are reduced (i.e., much different than 2105). Add all of these sources up and it is a very substantial amount of water not "insignificant" as BLM concludes.
Disposition: Comment acknowledged; does not provide new information

Response
CC-014-Modeled Ground Water Users

Letter 803, Comment 104

3.2.3.2.2 Page 3-66: Please recheck this information. It is our understanding that consumptive use of the Ruby Hill Mine is now expected to continue through at least 2023.
Disposition: Comment acknowledged; does not provide new information

Response
CC-014-Modeled Ground Water Users

Letter 803, Comment 105

3.2.3.2.2 Page 3-67: Still, the y-axis and title should be changed to clarify that the graph depicts the average annual consumptive use rate, not the pumping rate. BLM responded to previous comment 1729 that the "y-axis as stated on Figure 3.2.15 is accurate it reflects the data for pumping not consumption." Again, we point out that this is wrong. There is much more than ~35,000 gpm pumped in Diamond Valley and 35,000 gpm is the consumption rate. According to the NSE records, there is roughly 48,000 gpm pumped in Diamond Valley. Also see text on p. 3-65 that speaks of "consumptive use of ground water for agricultural...in Diamond Valley continues at 2009 rates (34,630 gpm)." Please correct both the y-axis and title as previously requested.
Disposition: Factual correction made (SEE RESPONSE)

Response
In Table 3.2-7 of the EIS, the column heading states "Net Agricultural Pumping," with a footnote (#2) explaining that this means net consumptive loss when referring to irrigation withdrawals. Figure 3.2-15 of the EIS present the same data, the title of the y-axis has no been revised since it refers to both agriculture and mine pumping rates; however, a footnote has been added to the figure stating "Note: Agriculture pumping is the annual net agricultural pumping, which is not consumptive the loss when refering to irrigation withdrawls."

Letter 803, Comment 106

3.2.3.2.2 Page 3-67: The precipitous falloff in Diamond Valley pumping forecast for 2105 is inaccurate because all pumping will not cease in one year but will slowly taper off. The pumping decline should be depicted by tapering in the model and depicted by a sloping line or curve and a range of scenarios should be used. While it is, of course, impossible to definitively model or describe the rate at which pumping rates will eventually decrease, the current depiction does little to adequately inform the reader about how the pumping will decrease.
Disposition: Comment acknowledged; does not provide new information

Response
CC-014-Modeled Ground Water Users

Letter 803, Comment 107

3.2.3.2.2 Page 3-69: Total Eureka County municipal water consumption in Diamond Valley is likely greater than the assumed 2006 rate and should not be assumed fixed at that rate for the duration. BLM should develop a projected rate using the baseline socioeconomic data for Mt. Hope along with growth projections for Ruby Hill and other local mines in coordination with Eureka County Public Works.
Disposition: Comment acknowledged; does not provide new information

Response

CC-014-Modeled Ground Water Users

Letter 803, Comment 108

3.2.3.3 Page 3-72: Throughout the document, particularly Section 3.2.3.3, monitoring is often referred to as a Mitigation Measure. For example, Mitigation Measure 3.2.3.3-2b, page 3-86 states "if monitoring (Mitigation Measure 3.2.3.3-a) indicates . . ." The BLM NEPA handbook states that design features are not mitigation. "Measures or practices should only be termed mitigation measures if they have not been incorporated into the proposed action or alternatives." (BLM NEPA Handbook, page 61). The monitoring program for the Mt. Hope Project, provided in Appendix B, is a design feature discussed in Section 2 Description of Alternatives, Including the Proposed Action and also incorporated into the Plan of Operations (PoO), therefore, by definition it cannot be mitigation. That monitoring should not be considered to be mitigation was explicitly addressed by Eureka County's comments to the second ADEIS, yet the BLM continues to define monitoring as a mitigation measure. Please disconnect monitoring from mitigation and remove all references to monitoring as a mitigation measure. Also, please be consistent between Table 3.2-9 and the multiple discussions of mitigation throughout the document.
Disposition: Comment acknowledged; does not provide new information

Response

CC-035-Monitoring Concerns

Letter 803, Comment 109

3.2.3.3.1 Page 3-77: Please revise to read "…have not been identified as having PWRs or vested water rights claims, but with sufficient flows to support such claims, could be affected." Further, subsisting rights to water livestock were ignored (NRS 533.492 through 500). Subsisting rights exist and are guaranteed regardless of a record at the NDWR. NRS 533.493 states, "Recognition of adjudicated rights to water livestock from streams by State Engineer. Within a stream system or groundwater basin...the State Engineer shall recognize rights to water livestock from streams, whether or not in conjunction with a right to use water for irrigation, which are established by a vested water right, a subsisting right shown as provided in NRS 533.492 or a permit issued by the State Engineer." The EIS must point out that each stream and stream system in a grazing allotment has an underlying and inherent right to water livestock.
Disposition: Comment acknowledged; does not provide new information

Response

NRS 533.493 does not state that each stream or stream system in a grazing allotment has an underlying and inherent right to water livestock. NRS 533.493 was added to require the State Engineer to allow stockwatering rights to be fulfilled directly from the stream source. The person who owns the livestock must still have some basis to use the water (vested right or appropriation). If the use of water by a person's livestock directly from the stream was initiated prior to 1905, then the person may be able to establish that his right to use the water vested before enactment of Nevada's water law. If the use of water from the stream was initiated after 1905, then the person must have obtained an appropriation from the State Engineer. The EIS acknowledges that such rights exist and may be impacted. Further quantification and identification of these rights would not add useful information to the analysis of environmental impacts.

Letter 803, Comment 110

3.2.3.3.1 Page 3-77: Please reference the legal basis for the 1800 gpd amount of "sufficient flow" to support PWRs. It seems like an unsupported and arbitrarily established flow amount.
Disposition: Comment acknowledged; does not provide new information

Response

The State Engineer has determined that the intent of PWR 107 was to reserve water rights from important spring sources and not withdraw land if the spring provides only enough water for a single family. In Nevada, domestic use for a single family residence is exempt from the requirement to obtain a permit from the State Engineer to use groundwater, but such use is limited to two acre-feet annually, which is approximately 1,800 gallons/day (NRS 534.180). By stating that the spring source must produce more than 1,800 gallons/day, BLM is following the State Engineer's threshold to determine when a spring may have a federal reserved water right under PWR 107. The State Engineer's determination is supported by the express language of the executive order withdrawing all public lands with a public water reserve (BLM regulations, Solicitor Coldiron's Opinion dated February 16, 1983, and related case law. See U.S. v. City and County of Denver, 656 P.2d 1 (Colo. 1982) U.S. v. Idaho, 959 P.2d 449 (Idaho 1998)).

Letter 803, Comment 111

3.2.3.3.1 Page 3-77: The text and Table 3.2-8 describes "springs that may be affected by Project activities." However, one spring, 641 or OT-7 also locally known as Nichols Spring has already been affected by Project activities, namely test pumping of well 206 that is completed in the carbonate aquifer. We have specifically highlighted this impact to BLM (and EML) on at least 5 different occasions. We initially brought this issue up after being informed about it from the ranch owners and water rights holders. The first time it was discussed with BLM and EML was at the January 13, 2010 meeting at BLM in Battle Mountain to discuss the water resources monitoring and mitigation with other cooperating agencies and stakeholders. We again specifically referenced this impact on both previous ADEIS and in our letter to BLM dated February 28, 2011 where we explicitly stated, "It is believed that pump testing of well 206 has already impacted Nichols Spring. Where in the EIS is this specific mitigation addressed?" Further, at a coordination meeting between Eureka County and BLM on November 16, 2011 this was again a point of discussion and we were told by Mr. Furtado to provide the comment again with any supporting evidence on the DEIS.

The flow of Nichols Spring may have been affected by the 32-day duration pumping test of EML's test well 206T in 2008. The spring had reportedly been a reliable source of stock water for the Roberts Mountain grazing allotment as long as anyone can remember. Since testing of 206T, the grazing permittee has reported a decline in flow and a need to haul water due to insufficient flow from this source to meet the needs of his livestock which was not previously necessary prior to the 2008 test pumping.

The geology in the vicinity of Nichols Spring and test well 206T is illustrated in the figure 1 below. Well 206T derives groundwater from highly fractured limestone and the Devils Gate Formation (Ddg in Figure 1) crops out a short distance northeast of the well site. Carbonate rocks belonging to a number of other formations (labeled Dnb, Ddl, Dm and DSl in Figure 1) are also present north of 206T. Well 206T is located near a northwesterly-trending normal fault which potentially may have some influence over the transmissivity of the carbonate rocks at this locale, because dissolution of fractured carbonate rocks can result in solution channels capable of transmitting large quantities of groundwater. Nichols Spring is located approximately 3.1 miles northeast of 206T and is mapped in the same limestone formation as well 206T (also Devils Gate Formation, Ddg). These two areas of limestone are separated by a ridge of basalt (the "basalt ridge" discussed in the various reports prepared for EML). Figure 1 also shows the presence of numerous faults, which result in relatively complex geologic conditions in this area, including faulting that might provide a means for a direct hydraulic connection between 206T and Nichols Spring. Several northeasterly-trending normal faults are mapped east and north of 206T. However, the transmissivity of these fault structures may be highly variable.

Figure 1 (Source: Montgomery et al. 2010)

Testing of 206T demonstrated the extremely permeable nature of the limestone at this locale as evidenced by the very large value for transmissivity, T, provided in figure 2 below. By the end of the 32-day test, nearly 10 feet of drawdown was measured in the two piezometers close to 206T (206 MS and MD) and more than eight feet of drawdown was measured in the deeper piezometer at the 205 site, approximately 1.1 miles to the southeast. No drawdown was observed at sites 203 and 204, located approximately 1.3 and 1.8 miles to the northeast, respectively. The lack of a drawdown response at the 203 and 204 sites is thought to arise as a result of the presence of relatively impermeable rocks east of 206T. The presence of a boundary roughly coincident with the basalt ridge is implied in the shape of the plot of drawdown versus time for the three observation wells (206 MS and MD and 205 MD) shown in Figure 2. In fact, testing results indicated multiple boundaries near 206T, suggesting the extent of the highly permeable limestone is limited, or that the limestone aquifer is "compartmentalized" in this area.

Figure 1

Because Nichols Spring is also situated east of the perceived boundary, at first blush it seems unlikely that testing of 206T could cause any impact on the spring flows. However, the transmissivity of the carbonate-rock aquifer "compartment" penetrated by well 206T, observation wells 206 MS and MD, and 205 MD is very high, such that geologic units that are one or two orders of magnitude less transmissive can still be expected to transmit some groundwater although they elicit a boundary response.

EML's baseline report (Buqo 2008) provided a map (Fig. 17) which illustrates the locations of faults in the vicinity of Mt Hope. A portion of Buqo's Figure 17 is provided below as figure 3 and the figure illustrates a somewhat different interpretation of faulting near 206T and Nichols Spring compared to Figure 1. The solid blue lines in Figure 3 represents faults with Quaternary or Holocene movement and which "may be highly transmissive."

One such potentially highly transmissive northeast-trending fault is shown transecting the basalt providing a potential means for drawdown east of the basalt ridge. While this fault is not depicted as intersecting the southerly trending fault aligned with Nichols Spring, it represents a potential for the drawdown response to be propagated in the direction of Nichols Spring. Once pumping of 206T was terminated, the recovery of water levels in the observation wells has proceeded at a slow rate, consistent with a compartmentalized aquifer, but water levels are reportedly still recovering as the compartment is filled with water from adjacent areas.

Figure 2 (Source: Buqo 2008)

Although there may be no identified direct hydraulic connection between the carbonate rocks exploited by well 206T and the carbonate rocks near Nichols Spring, there is also no hard evidence that some degree of connection does not exist. In fact, different investigators for EML provide different geologic interpretations of faulting in this area. We believe we have highlighted reasonable connection between the pumping of well 206T and the decrease in flow at Nichols Spring.
Further, the complexity of the geology in this area and this potential adverse impact underscores the need for better committed monitoring of the water resources that potentially might be impacted by groundwater extractions by the Project. Painfully, as was the case here, if an adequate baseline is not established prior to any Project related pumping, this undermines the entire process moving forward with discerning of impacts and tying those impacts to Project related activities.
Please propose what can be done by EML to work with the impacted water rights holder to come to agreement on mitigation to address the impact to Nichols Spring or provide some other reasoning as to why EML is not held accountable for this impact.
Disposition: Comment acknowledged; does not provide new information

Response

There is no evidence or data to support the decrease in the flows that the commenter states have been reported by the rancher. The following is provided in an April 24, 2012 (updated June 19, 2012), technical memorandum prepared by Interflow, "Over six years of baseline spring monitoring has been conducted on Nichols Spring, including two years of monitoring prior to drilling and testing of the 206T test well. Nichols Spring flows were measured during the course of the 32 day pumping test, without any observed change in spring flow beyond the seasonal background trend. Spring flows observed during the year in which testing was conducted (2008) were similar to flows observed in both 2007 and 2009, the year before and after testing. Static water levels at the 206T well were slow to recover due to a compartmentalized aquifer condition, and did not completely return to starting static water levels due to a superimposed long-term declining background trend which is documented by continued monitoring of water levels at the 206T well."

Letter 803, Comment 112

3.2.3.3.1 Page 3-78: We are particularly pleased to see that the BLM finally recognized the decreed water rights associated with Henderson Creek. Reference to these rights and the possibility of impacts to them were omitted from the two ADEIS. Our continued insistence that the BLM consider these rights was based on a 2010 opinion by the 9th Circuit of the U.S. Court of Appeals that made it exquisitely clear that senior (first in time) decreed water rights cannot be affected by junior (later in time) groundwater appropriations (9th Cir. 2010. United States v. Orr Water Ditch Co.; No. 07-17001 D.C. No.CV-73-00018-LDG). The analysis of drawdown arising from the proposed Project showed more than 10 feet of drawdown predicted for the headwaters of the South Fork of Henderson Creek. The DEIS categorizes the overlap of the 10-foot drawdown contour with a water resource (well, spring or stream) as a potentially significant impact that can be expected to decrease flow in the stream and the springs that provide the base flow to the stream as well as vegetation and wildlife habitat. While BLM has no jurisdiction over water rights, throughout the DEIS wherever senior water rights are predicted to be impacted by the Project, regardless of a court decree, the BLM must address adverse impacts to these rights and propose mitigation measures consistent with the BLM NEPA Handbook which states all "relevant, reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the agency."
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 803, Comment 113

3.2.3.3.1 Page 3-81: The colors of the contour lines for Year 2065 and Year 2455 are too similar and are hard to distinguish, especially around the area of the mine. Please revise to make them easier to separate.
Disposition: Comment acknowledged; does not provide new information

Response

The contour line for Year 2455 is coincident with other contour lines around the open pit, and is generally not visible except in the area to the east and south of the open pit. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 114

3.2.3.3.1Page 3-85: The first full paragraph on 3-85 states that surface and spring water flows affected by the 10-ft drawdown are assumed to be interconnected with the regional ground water system, but the next paragraph asserts that springs within the Roberts Creek drawdown area "…are not hydraulically interconnected with the regional ground water system." This statement contradicts the assertion made in the previous paragraph and has no data to support the conclusion. Please revise for clarity and based on conclusions supported by data.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-039-Assumptions of Scope of Impacts to Springs

Letter 803, Comment 115

3.2.3.3.1 Page 3-85: Previous ADEIS comment (see 1734) was not addressed and BLM's response actually strengthens the need to incorporate the comment. It is dangerous to include only impacts to perennial springs as being analyzed or considered in the impacts and mitigation of impacts. Please revise to include our previous comment that, "Because a spring does not express itself perennially does not always mean that it is not primarily controlled by the regional ground water system. Connection to the regional groundwater system may be the component necessary to ever express these springs and seeps at the surface (i.e., intermittent). If ground water drawdown occurs at any of these types of springs or seeps, they may be impacted and never again express at the surface." Much of the habitat around these areas is in fact adapted to these intermittent expressions of the water at the surface. Account for this in the impacts analyses and describe adequately as recommended above.
Disposition: Other (SEE RESPONSE)

Response

The word perennial has been retained because the analysis is based on the assumption that perennial springs are connected to the regional ground water flow system. Intermittent springs are assumed to be sourced from local, perched ground water that are not connnected to the regional ground water system. However, as discussed in the response to Comment #114 from Letter #803, it is conservatively assumed that all of the springs are connected to the regional aquifer.

Letter 803, Comment 116

3.2.3.3.1 Page 3-86: BLM's response to previous comments (see 1737) was that the word "perennial" had been removed but the word "perennial" has not been removed as requested and committed to by BLM. Remove "perennial" in at least two locations in the impacts discussions on p. 3-86. Connection to the regional groundwater system may be the component necessary to ever express even intermittent springs and seeps at the surface. If ground water drawdown occurs at any of these types of springs or seeps, they may be impacted and never again express at the surface. Much of the habitat around these areas is in fact adapted to these intermittent expressions of the water at the surface. Account for this in the impacts analyses and describe adequately as recommended above.
Disposition: Other (SEE RESPONSE)

Response

The word perennial has been retained because the analysis is based on the assumption that perennial springs are connected to the regional ground water flow system. Intermittent springs are assumed to be sourced from local, perched ground water that are not connnected to the regional ground water system. Please note that Section 3.2.3.3.1 of the EIS states that eight of 22 potentially impacted springs are considered to be perennial, while the discussion of impact 3.2.3.3-2 recognizes that all 22 springs within the projected area of 10 feet or more of drawdown are identified as potentially impacted.

Letter 803, Comment 117

3.2.3.3.1 Page 3-86 and 3.2.3.3.2 Page 3-104: Why would BLM need to take more time to "evaluate the available information and determine whether mitigation is required" when it has already been determined (based on language directly above) that flow reductions already "are likely the result of mine-induced drawdown"? Please ensure that the analysis of these measures is sufficiently done in this NEPA process in order to facilitate effective, adaptive management and avoid unnecessary and burdensome additional evaluation.
Disposition: Other (SEE RESPONSE)

Response

The BLM will use the results of the required monitoring to determine if or when mitigation measures will be triggered. As stated in the EIS under Mitigation Measure 3.2.3.3-3b, "mitigation would depend on the actual impacts and site-specific conditions" and cannot be fully anticipated at this time.

Letter 803, Comment 118

3.2.3.3 Page 3-86: Many of the proposed mitigation measures themselves will require environmental review. Nowhere in the DEIS is there an analysis, rigorous or otherwise, of the potential impacts from the actions associated with the proposed mitigation strategies. The BLM NEPA Handbook (pg. 62) clearly states "During impact analysis, analyze the impacts of the proposed action (including design features) and with all mitigation measures (if any) applied, as well as any further impacts caused by the mitigation measures themselves." We request that BLM more thoroughly address the fact that many of the proposed mitigation measures themselves may require environmental analysis and discuss how the time to prepare and process the analysis might impact mitigation. Please provide the appropriate rigorous analysis of the potential environmental effects of each proposed mitigation measure throughout the DEIS regarding each resource in addition to just water. This is necessary to facilitate effective adaptive management.
Disposition: Analysis modified (SEE RESPONSE)

Response

The FEIS will include a map showing the location of the pipeline and any additional disturbance or facilities that would be required if ground water is pumped to mitigate decreased surface flows. Pumping ground water to mitigate for potential reduction of surface

water flow is only one mitigation option identified in the EIS. Potential impacts from implementation of mitigation are disclosed in Table 3.2-9 and Table 3.2-18 in the EIS.

Letter 803, Comment 119

3.2.3.3 Page 3-87: Table 3.2-9 (as well as Table 3.2-18) defines the "trigger" for mitigation of impacts to surface water resources as "cessation" of flow. This is inconsistent with the text throughout Section 3 of the DEIS which states mitigation will be triggered by a "reduction" in flow attributable to the Project. If triggers are to be addressed, and it is imperative that they be clearly defined, then they must be consistent throughout the document, since any ambiguities or inconsistencies will obstruct mitigation of future impacts. Where a reduction of flow is proposed to trigger mitigation, a discussion regarding what constitutes an allowable reduction in flow must be provided for each and every source that is within the area where impacts are predicted to occur, including any resource for which pre-statutory rights (vested and subsisting rights) exist, even if claims of these rights have not yet been filed with the State Engineer. Because Nevada water law clearly protects senior vested, decreed, and senior water rights from effects by junior appropriators, the only acceptable trigger for mitigation of vested or decreed rights should be "any reduction" in the flow or discharge attributable to the Project. Please revise for consistency by adopting "reduction in flow" of any surface water resource (springs or streams) attributable to the Project as the trigger for mitigation in order to guarantee the rights associated with these sources are provided the protection afforded them under Nevada law. Specifically, change the trigger "cessation of flow" in Table 3.2-9 and 3.2-18 to "reduction in flow attributable to the Project." Modify each applicable subsection throughout the document to make it clear that reduction in flows of water sources associated will be mitigated.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 803, Comment 120

3.2.3.3 Page 3-87: During a meeting in December 2011 between the Nevada State Engineer, EML staff and Eureka County regarding a 3M plan related to EML's groundwater appropriations, the Nevada State Engineer clearly stated that curtailing the pumping by the Project is a mitigation measure that is available under Nevada water law and is "on the table" in the event attempted mitigation unsuccessfully resolves an impact to a senior water right. Nowhere does the DEIS speak to this legitimate and appropriate mitigation measure. This remedy, which is authorized in the Nevada statutes, was brought to the BLM's attention in our comments to the two ADEIS. The BLM NEPA Web guide states "All relevant, reasonable mitigation measures that could improve the project are to be identified, even if they are outside the jurisdiction of the lead agency or the cooperating agencies, and thus would not be committed as part of the RODs of these agencies. Sections 1502.16(h), 1505.2(c). This will serve to [46 FR 18032] alert agencies or officials who can implement these extra measures, and will encourage them to do so. Because the EIS is the most comprehensive environmental document, it is an ideal vehicle in which to lay out not only the full range of environmental impacts but also the full spectrum of appropriate mitigation." Please make it explicitly clear that curtailing the Project's groundwater pumping is a mitigation measure provided in Nevada water law.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-128-Authority for Water Mititgation

Letter 803, Comment 121

3.2.3.3.1 Page 3-87: Table 3.2-9 is directly at odds with and contrary to the text in many places. The table speaks to a trigger of being "cessation of flow coincident with reduction in ground water" but the text (and significance criteria) speaks of reductions of flow, not cessation. Having a trigger of "cessation of flow" is dangerous and much too liberal. Cessation of flow is the failure of the adaptive monitoring, management, and mitigation program. The purpose of monitoring is to detect an impact when it occurs. Waiting to implement mitigation only at cessation of flows is unreasonable and will unduly overlook real impacts since real impacts will occur with reductions of flow. Waiting until there is a cessation of flow will result in impacts occurring that at the state of flow cessation become unmitigable. Additionally, the effectiveness of mitigation spelled out in the Table cannot be correct since a water supply from the Project's wellfield cannot "provide a perennial water supply" given the fact that perennial means always and forever. Someday the Project will cease and the impacts are projected to occur for centuries at some locations. The mitigation trigger must be reduction in flows attributable to the Project. Please revise with this language.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 803, Comment 122

3.2.3.3 Page 3-87: Tables 3.2-9 and 3.2-18 list springs with flows as high as approximately 70 gpm that fall within the predicted maximum extent of the 10 foot contour and, therefore, have a potential for "significant impact." Yet for some springs listed, mitigation involves replacing the natural spring flow (regardless of the measured flow) after it ceases to flow with 0.5 gpm piped from the mine's

Kobeh Valley water supply. The justification for such paltry measures that do not address the impact to a statutorily protected vested water right is not discussed, nor has any rationale been provided as to why only a small portion of the loss will be mitigated. Please revise to ensure that mitigation would restore any reduction in flow attributable to the Project to be consistent with Nevada Law that requires that new appropriations not impact vested rights.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-062-Mitigation of Diminished Water Flows

Letter 803, Comment 123

3.2.3.3 Page 3-87: At the cooperating agency All Parties meeting in Battle Mountain in December 2010, the BLM declared it takes a minimum of three years to permit many, if not all, of the measures proposed for mitigation of the impacts to water resources predicted to occur as a result of the Project. Since Tables 3.2-9 and 3.2-18 state mitigation is not triggered until a water source ceases to flow, what happens to livestock, wildlife, wild horses, and water dependent resources in the meanwhile? What about the financial impact of the loss of the resource over many years until the loss is fully mitigated? Most likely livestock and wildlife will be pressed to over utilize nearby water sources and water-dependent resources (forage) while permits needed to implement mitigation are processed. This assumes, of course that the first mitigation attempt is successful. According to the BLM NEPA guidance "If the necessary mitigation measures will not be ready for a long period of time, this fact, of course, should also be recognized." The DEIS glosses over the fact that many of the mitigation measures may take a significant amount of time to permit and implement. Please revise to clearly disclose that some mitigation measures will take years to permit and implement and that the impact could get worse before mitigation takes effect and then frame what would be done by BLM to address this issue.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 803, Comment 124

3.2.3.3 Page 3-87: Proposed mitigation must be practicable and ". . . to ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measures being implemented must also be discussed" (BLM NEPA Handbook). Unfortunately, many of the proposed mitigation measures summarized in Table 3.2-9 and 3.2-18 and discussed in Section 3 are far-fetched. For example, a "cessation" of stream flow in Henderson Creek during the period of active mining is proposed to be mitigated by an inter-basin transfer of groundwater from Kobeh Valley. Furthermore, this proposed mitigation measure will require peak diversion rates of up to 2,400 gpm and an annual usage of approximately 1,400 acre-feet of water in addition to the 11,300 afy of groundwater needed for the project. Yet, there is no assessment of the potential impacts in Kobeh Valley associated with this mitigation measure. NEPA requires that the impacts of all direct actions and cascading effects be analyzed. Please provide the appropriate level of analysis to demonstrate that a particular mitigation strategy is technically feasible and practicable, not just an opinion that it will be effective. As required, please analyze the potential impacts of the mitigation measures themselves.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-059-Impacts of Mitigation Implementation

Letter 803, Comment 125

3.2.3.3 Page 3-87: What is the source of water rights needed for mitigation during active mining given that the Project proposes to consume all of the 11,300 acre-feet per year available under their current groundwater appropriations? EML testified during administrative hearings before the Nevada State Engineer that the project will consume all of the groundwater water they applied for (11,300 afy was applied for and the project is expected to consume all of this). In other words, EML (or its subsidiary KVR) has no surplus water to devote to mitigation. As a result, mitigation will require EML to file for new groundwater appropriations or change the point of diversion, place and manner of use of existing water rights they might acquire elsewhere in Kobeh Valley. This takes time and there is no guarantee that the water rights will be available, transferable, or grantable. This is especially true where the proposed mitigation measure is an inter-basin transfer of groundwater which requires even more oversight from the State Engineer. Please fully disclose that EML currently holds 11,300 afy of water rights for mining and milling purposes for the Project from all sources and that EML has testified in administrative hearings before the Nevada State Engineer that the Project as designed will consume all of this water. Therefore, the Project does not have sufficient water for this specific mitigation measure.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 803, Comment 126

3.2.3.3 Page 3-87: Some proposed mitigation measures require inter-basin transfers. Proposed mitigation measures (see Table 3.2-9) for predicted impacts in Pine Valley (as defined by more than 10 feet of drawdown predicted at springs in the headwaters of

Henderson Creek and the perennial reach of the South Fork of Henderson Creek) during active mining involve an inter-basin transfer of water from Kobeh Valley to Pine Valley. The DEIS fails to disclose the ramifications of such inter-basin transfers. Permitting an inter-basin transfer takes time and time is of the essence with respect to the loss of a water supply or forage for livestock and wildlife; the animals simply cannot wait. Furthermore, neither the BLM nor the proponent can guarantee any assurance that the Nevada State Engineer will grant an inter-basin transfer for this purpose. How will impacts to wildlife, wild horses, and water dependent resources be overcome when this happens? How will grazing permittees be compensated for the loss of income until effective mitigation is in place? Please make the DEIS exquisitely clear that certain proposed mitigation measures will require an inter-basin transfer of groundwater and that the Proponent currently does not hold sufficient water rights to effect proposed mitigation measures. The discussion should provide a clear understanding of all the issues associated with inter-basin transfers, including compensation for the loss of a water source until mitigation is fully operational.
Disposition: Comment acknowledged; does not provide new information

Response
CC-026-Water Mitigation for Pine Valley

Letter 803, Comment 127

3.2.3.3 Page 3-87: Proposed mitigation for an adverse impact to senior water rights in the headwaters of Henderson following the end of mining (for example Mitigation Measure 3.2.3.2-2c and 3.2.3.5-2c) is even more far-fetched than those proposed for implementation during the life of the project. These proposed post-mining measures include constructing wells capable of yielding as much as 2,400 gpm in the Henderson Creek watershed. EML's consultants constructed a groundwater flow model (which BLM accepted as suitable for EIS analysis) using what they believe to be appropriate values for aquifer hydraulic properties based on their interpretation of the geology. In the headwaters of Henderson Creek, the available information indicates the geologic materials in this area are ". . . thought to have limited water production potential and . . . interpreted to typically act as an aquitard" (p. 3-44). In fact, ". . . these rocks typically are not targets for water production" (ibid.). Furthermore, the Project depends on these geologic formations being relatively impermeable to minimize potential impacts related to pit dewatering, in particular, and impacts to water resources in Diamond Valley, in general. Based on the aquifer properties assumed for the Project's groundwater model, wells with yields large enough to mitigate a "cessation" of stream flow should not be expected in the headwaters of Henderson Creek. This obvious conclusion is consistent with the analysis of pit dewatering impacts which shows the 2,500 feet deep pit, a humongous well in its own right, will likely yield the equivalent of only a fraction of the groundwater needed to mitigate the loss of stream flow in Pine Valley. In summary, the DEIS provides no analysis to suggest there is any likelihood that groundwater in sufficient amounts to mitigate a cessation of stream flow can be developed in the area where mitigation must take place, nor is there any analysis of the environmental consequences of these groundwater extractions proposed for mitigation. To complicate matters further, EML holds no water rights in Pine Valley that would be needed to mitigate any reduction of stream flow there after mining ceases, much less a total cessation of flow. Please provide a rigorous analysis that demonstrates this mitigation measure is technically feasible and practicable. Given the data and information used to construct the groundwater flow model, it is unlikely that analysis of this option will be able to support the mitigation measure as realistic.
Disposition: Comment acknowledged; does not provide new information

Response
CC-026-Water Mitigation for Pine Valley

Letter 803, Comment 128

3.2.3.3.1 Page 3-95: Spring 641, OT-7 is not unnamed, it is Nichols Spring. It is a vested water right claim located on private land that supports the grazing rights of Roberts Creek Ranch. First of all, the General Use column speaks of the spring as being "water supply for wild horses with limited livestock use" where, in fact, wild horses are not a legitimate use of this spring on private land and this spring is of primary importance to the grazing operations in this area. Secondly the mitigation proposes to take private property on private land and mitigate on public land. This is essentially a federally supported takings of private property. Please explain how this is justified? Revise with mitigation that would require that all springs, especially those on private land, must be mitigated in the same location.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-128-Authority for Water Mititgation

Letter 803, Comment 129

3.2.3.3.1 Page 3-99: Most of the measures outlined would require further NEPA analysis and would contribute to the impact through a feedback loop. All references to "new water" or "new sources" should be removed as there will be no "new" water, but redistribution of water in the same hydrologic system. The BLM NEPA Handbook clarifies those impacts from mitigation measures themselves need to be fleshed out and disclosed. Each measure pursued would also require cultural clearances, environmental studies, ROW grants, etc. If Kobeh Valley is fully appropriated by the State Engineer, where would the water rights come from for these additional mitigation measures? These measures will create environmental impacts of their own. Also, when is the trigger point to finally curtail pumping (which may be the only realistic mitigation measure)? BLM responded to this previous made comment (1751) by stating

"The water right issue is not within the BLM's jurisdiction. The environmental impacts of the implementation of the mitigation have been included in the analysis" but this downplays and overlooks the responsibilities of BLM as outlined in the BLM NEPA Handbook. Specifically, on p. 62 of the Handbook it states, "Identifying mitigation outside of BLM jurisdiction serves to alert the other agencies" and "In describing mitigation under the authority of another government agency, you must discuss the probability of the other agency implementing the mitigation measure." BLM must provide some discussion of how water rights would be obtained for these mitigation measures. This comment applies to nearly every mitigation measure in the document that would require replacement of a surface water source. We will not make the same comment every time, but we request that the change be made throughout the document.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-128-Authority for Water Mititgation

Letter 803, Comment 130

3.2.3.3.1 Page 3-99: The mitigation measures might be effective at providing flowing water, but the long-term effectiveness is diminished by the fact that all other sources proposed for mitigation have strict reliance on anthropogenic maintenance that generally declines through time and has no guarantee of happening, even with a long term trust account. This should be discussed in the document.
Disposition: Comment acknowledged; does not provide new information

Response
CC-094-Long-term Water Mitigation

Letter 803, Comment 131

3.2.3.3.1 Page 3-99: Posting of an additional bond during "closure process" is not a reasonable mitigation measure for impacts that "may occur after the end of mining and milling operations." Sufficient funding must be in place before the Project ever starts to ensure funding is available throughout the Project to cover the worst case scenario and to account for the chance that "the end of mining and milling operations" is sooner than 44 years. What if EML or its successor owner chooses to walk away after only a few years based on issues or market conditions? Where is the mitigation guarantee for these circumstances (which have happened many times in Nevada and is the basis for some CERCLA "superfund" sites)? As we requested in our overview letter, please work out the very specific details of this funding mechanism and then describe in the EIS in great detail the mechanics involved in setting up and drawing from the long-term mitigation funding accounts.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 803, Comment 132

3.2.3.3.2 Page 3-100 and 3.2.3.3.2 Page 3-103: The wells described, 204 and 310, have at least a subsisting right to water livestock. See previous County comments related to subsisting rights to water livestock, as outlined in NRS 533.492 through 533.500. It is incorrect to consider impacts to wells 204 and 310 as "not deemed significant because neither one is associated with a valid and active water right." As pointed out on both ADEIS and again here, these wells are very important to the ranching operations associated with the current grazing permits. These sources have at least subsisting rights to water livestock, which are considered valid and active water rights. Further, depending on when these wells were put in, they could be vested water rights that require no record with the State Engineer in order to be valid or active. Overlooking these two wells overlooks real impacts to a livestock business operation, wildlife, and wild horses that use the water from these wells. Re-evaluate the impacts to these wells and include them in the mitigation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-054- Impacts to Water Wells

Letter 803, Comment 133

3.2.3.3.2 Page 3-101: The development of a pit lake is predicted to cause impacts (primarily drawdown) to continue to propagate into the headwaters of Henderson Creek for hundreds of years after mining ceases, potentially affecting surface water resources (springs and stream flow). Yet virtually no details of the analysis are provided in the DEIS, save for Figure 3.2.21 which provides a graphical summary of the water budget associated with the pit. The only way to gain even the most basic understanding of how the pit will affect the local groundwater flow regime is to delve into the local model report incorporated into Montgomery 2010 which is extremely cumbersome at best. Please provide additional discussion of the local model and how it was used to assess pit lake development.
Disposition: Comment acknowledged; does not provide new information

Response
The pit lake model and ground water flow model are available for review at the Battle Mountain BLM office and are part of the administrative record. The EIS discloses impacts from the Proposed Action to surface water flows in Section 3.2.3.3.

Letter 803, Comment 134

3.2.3.3.2 Page 3-103: As we previously requested, please place language from NRS that speaks to the protectable interest in domestic wells. Insert language that reads, "Through NRS 533.024, the Nevada Legislature declared the policy of the State of Nevada "to recognize the importance of domestic wells as appurtenances to private homes, to create a protectable interest in such wells and to protect their supply of water from unreasonable adverse effects which are caused by municipal, quasi-municipal or industrial uses and which cannot reasonably be mitigated." This will document how imperative it is for adverse impacts to domestic wells to be fully and effectively mitigated. Further, continuing to state that these wells are "undocumented" is incorrect. As we previously pointed out to BLM on both ADEIS, domestic wells are documented with the County Assessor and no effort was taken by BLM to research the documentation on these wells. Please carry this analysis forward to define where these wells exist and the impacts that could occur to these domestic wells and what would be required to mitigate these specific impacts.
Disposition: Comment acknowledged; does not provide new information

Response
Potential impacts to domestic wells are discussed in Section 3.2.3.3.2 of the EIS. They are also subject to mitigation requirements under authority of the State Engineer. No changes have been made in the EIS in response to this comment.

Letter 803, Comment 135

3.2.3.3.2 Page 3-103: As previously requested, please add the Roberts Creek Ranch domestic well into Table 3.2-10. Also add wells 204 and 310 since, as previously explained, they currently do have rights associated with them as the table title suggests, and they are wells that may be affected.
Disposition: Comment acknowledged; does not provide new information

Response
CC-054- Impacts to Water Wells

Letter 803, Comment 136

3.2.3.3.2 Page 3-103: While it is a great improvement in the DEIS to acknowledge the jurisdiction of NDWR, there still is no effort to include NDWR in the process so all affected stakeholders and authorities are "on the same page." Eureka County has requested this effort for three years and we find the lack of response and effort by BLM to be disconcerting. We have spoken to the State Engineer's office, and documented our conversations, regarding some of the mitigation measures outlined in the DEIS and they voiced concern with some of the provisions and how they would be carried out. This magnifies our concern and shows how the process moving forward will be extremely difficult since the agency with primary jurisdiction over water resources, NDWR, is already showing hesitation for what the DEIS calls for in mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-128-Authority for Water Mititgation

Letter 803, Comment 137

3.2.3.3.2 Page 3-103: It is not clear to us what the phrase "EML would assess the distance of the screened interval and the pumping below the ground water table" means. We are assuming that it means that the screened interval of the well would be compared to the drawdown of the water table tied to Project pumping and if Project pumping does not lower the water table enough to need a deepened well (or pump) then EML would just cover the increase in pumping costs. Please revise to clarify.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-052- Ground Water Pumping

Letter 803, Comment 138

3.2.3.3 Page 3-103: The DEIS states ". . . ground water drawdown is predicted to exceed ten feet at the locations of seven wells with associated ground water rights." "Impacts to the seven wells . . . are potentially significant . . ." As discussed previously, monitoring (Mitigation Measure 3.2.3.2-3a) is referred to as a mitigation measure, which it is not. Mitigation Measure 3.2.3.3-2b (Page 3-104) goes on to describe several possible mitigation measures. One of these is "Infiltrating or injection water during operations at strategic locations to limit drawdown propagation in certain areas." There are a number of concerns regarding this proposed measure. First, EML/KVR holds 11,300 afy of groundwater rights for mining and milling purposes. EML testified during administrative hearings before the Nevada State Engineer that their project as designed will consume all of the groundwater allowed under these appropriations. Therefore, the Project does not hold sufficient water rights for this proposed mitigation measure. In order to implement

this measure, additional rights must be acquired. The acquisition of these rights takes time. This option would require EML to pump more than the 11,300 afy that has been analyzed as part of this DEIS and the required analysis of the impact of this action has not been analyze, much less an analysis to determine whether the measure is feasible or practicable. Per the BLM NEPA Handbook p. 62, please provide an analysis of the impact associated with pumping additional groundwater from the Kobeh Valley Central Wellfield needed to implement this proposed mitigation measure. Provide a rigorous analysis of the practicality and feasibility of the mitigation measures. Repeat the analysis for each of the appropriate alternatives.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 803, Comment 139

3.2.3.3.2 Page 3-105: Please add "with concurrence from NDWR" or "in coordination with NDWR" to now read "…measures, as directed by the BLM in coordination with NDWR:" BLM may provide direction and make recommendations regarding mitigation but the NDWR has sole discretion on what would be required. The NEPA Handbook outlines that mitigation measures, even outside of BLM jurisdiction, must be credited to the proper authority to "alert the other agencies that can implement the mitigation" (p. 62).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-052- Ground Water Pumping

Letter 803, Comment 140

3.2.3.3.2 Page 3-105: There is nothing in place to ensure that the wells that provide stock water will continue to provide the necessary subsisting right to water livestock as required under NRS. For example, if EML were to purchase the affected water right rather than mitigate the water source itself, the subsisting right at these same locations would be taken away. Please revise to ensure that a subsisting stock water source remains at all locations where livestock (and wildlife and wild horses) currently water.
Disposition: Comment acknowledged; does not provide new information

Response

CC-048-Water Mitigation for Wildlife and Horses

Letter 803, Comment 141

3.2.3.3.2 Page 3-106: Despite our previous comments, not all changes were appropriately made. 167 afa comes into Kobeh Valley from Pine Valley and this will change the amount of flow from the portion of Pine Valley out of the HSA so the "Entire HSA" column should be changed to reflect this. Both the table and the text overlook the possibility of interception of the flow between Kobeh Valley and Diamond Valley (1500 afa). If the pumping in Kobeh Valley is going to intercept ET (4015 afa), it must be expected to intercept the 1500 afa flow into Diamond Valley. Please account for the subsurface flow as described. Also, the decrease in groundwater inflow to Diamond and Kobeh Valleys due to pit lake evaporation (80% of 165 afa or 132 afa in DV and 20% of 165 afa or 33 afa in KV) must be included in the water budget (tables and text). The text and tables downplay the impacts to basin water budgets and are not defensible as currently presented.
Disposition: Comment acknowledged; does not provide new information

Response

The column labeled "Entire HSA" indicates inflows and outflows to the study area. The comment regarding Pine Valley flows to Kobeh Valley resulting in an outflow from the HSA is incorrect. The change in flows between hydrographic basins does not necessitate HSA boundary flux changes. For example, the increase in Pine Valley flow to Kobeh Valley predominantly reflects subtle shifts in the flow field simulated near hydrographic divides, which are fixed lines based on land surface topography. Net change in flow between Kobeh Valley and Diamond Valley as simulated in the model is accurately reported in Table 3.2-11, being a gain of 15 acre-feet per year at 2055. This number consists of two components – pit area flow and regional flow. The regional flow component is an interception of 25 AF/yr out of a simulated flow between the basins of 2,380 AF/yr at year 2055. The cumulative pit lake water balance is incorporated in the hydrographic basin water balance and resulting changes in flows are reported in Table 3.2-11. The pit lake evaporation values in the comment are not applicable for year 2055 – but reflect equilibration conditions of pit that occur much later in time.

Letter 803, Comment 142

3.2.3.3.2 Page 3-106 (and Page 3-136): Please explain how the change in groundwater budget is reported as being the same for the Proposed Action and the Partial Backfill Alternatives in 2055 and 50 years post-project. Given the hundreds of years until the water reaches some kind of equilibrium, water budgets must be analyzed and reported further into the future to take into account all potential groundwater budget impacts and outline appropriate mitigation measures.
Disposition: Comment acknowledged; does not provide new information

Response

Changes in the ground water budget rates for the Proposed Action /No Action comparison (Tables 3.2-11 & Table 3.2-12) and changes in ground water budget rates for the Partial Backfill/No Action comparison (Tables 3.2-15 & Table 3.2-16), at end of mining 2055 and 2105, are not the same. For example, net change in outflow for Diamond Valley at 2105 for the Proposed Action/No Action comparison is -65 afy (Table 3.2-12) and is -51 afy for the Partial Backfill/No Action comparison (Table 3.2-16). Other ground water balance rate change components show similar incremental differences. The relatively minor differences in the values for these sets of comparisons demonstrates that it is not necessary to report water budgets for the Partial Backfill alternative further into the future in order to provide a useful analysis of impacts.

Letter 803, Comment 143

3.2.3.3.2 Page 3-106: These tables highlight how there is lack of common sense and consistency in many aspects of the analysis. We brought this up in both previous ADEIS. On page 3-108 it speaks to groundwater evaporation at the pit to be 165 gpm which equates to about 264 afa. How then can the table report ET of groundwater be only reduced by 52 afa in Diamond Valley? Also, with the decrease in precipitation recharge and the evaporation that occurs because precipitation that will fall on the TSFs and in the pit sink and become unavailable for recharge into each basin, it is impossible for the precipitation recharge change to be zero under the proposed action. Please re-analyze and make proper changes accordingly.
Disposition: Analysis modified (SEE RESPONSE)

Response

Tables 3.2-11 and 3.2-12 correctly report the ET values for Diamond Valley water budgets projected by the hydrologic model. The text on page 3-108 (Consumptive Losses) explains that, for the Proposed Action, consumptive loss of groundwater due to pit lake evaporation would be 165 gpm after 100 years of pit filling (year 2144) and 100 gpm after 800 years of pit filling (year 2844). The 52 afa ET reduction in Diamond Valley shown on Table 3.2-11 is for the Proposed Action at year 2055, which is the end of operations and is not comparable to rates described on page 3-108 for 100 and 800 years post-mining. In year 2055, the ground water system is not projected to be at equilibrium and the projected pit ground water inflows, at over 200 gpm, are substantially larger than the projected 52 afa (32 gpm) ET reduction (Figure 4.5-7; Montgomery et al. 2010).

Ground water inflow to the pit at 2055 and 2105 is 371 AF/yr and 286 AF/yr, respectively. This ground water inflow to the pit was not included in the Table 3.2-11 and 3.2-12 water balance calculations. To disclose this change that would occur relative to the No Action Alternative, the amount of ground water that flows to the pit will be added to Tables 3.2-11, 3.2-12, 3.2-15 and 3.2-16 in the row labeled "Net Ground Water Pumping" and an explanatory footnote will be added.

The precipitation recharge values in DEIS Table 3.2-11 have been corrected to show -38 AF in Kobeh Valley (lack of recharge occurring in the Kobeh Valley portion of the pit) and -226 AF of recharge reduction at the lined PAG adjacent to the pit in Diamond Valley. These recharge reductions are incorporated in the numeric flow model and reflected in other water balance flow changes presented in Table 3.2-11. No reduction in recharge has been simulated in the model for the TSF areas, because the initial recharge input in the TSF area is very low (less than one AF/yr). This is because a portion of the TSF is situated on the valley floor where it is assumed that no recharge takes place and the remaining portion is situated on an alluvial fan environment which is assigned a very low recharge rate in the model. Thus the reduction in recharge by the TSF is not deemed hydrogeologically significant enough to represent as a change in the model.

Letter 803, Comment 144

3.2.3.3.2 Page 3-108: It still appears that the calculation for groundwater evaporation from the pit may be incorrect. The amount reported in the description and Impact 3.2.3.3-6 must actually be net evaporation of all water that flows to the pit, including precipitation run-off. If true, this analysis obfuscates the issue of evaporation of groundwater. The established pan evaporation rate from the nearest location, the UNR Gund Ranch, is 51.17 inches per year. A rough calculation of the pit lake surface area compared to this evaporation rate appears to us to possibly be much higher than reported. Please re-visit and better explain how just groundwater evaporation was separated out of net evaporation from the pit lake and how it was calculated and justified as it seems very low for the projected pit lake surface.
Disposition: Analysis modified (SEE RESPONSE)

Response

As shown on Figure 4.5-7 (Montgomery et al. 2010) the 100 gpm described in 3.2.3.3-6 is the simulated ground water inflow to the pit at equilibrium, which is then lost to evaporation. The pit-lake is predicted to behave as a hydraulic sink and water that reports to the pit lake will be lost to evaporation. The ground water lost to evaporation is considered to be the amount consumptively used by the pit. To disclose this change that would occur relative to the No Action Alternative, the amount of groundwater that flows to the pit wasadded to Tables 3.2-11 and 3.2-12 in the row labeled "Net Ground Water Pumping" and an explanatory footnote was added.

Also provided on Figure 4.5-7 is the simulated lake evaporation, which reached an equilibrium value of approximately 375 gpm. This amount was determined by the model using a specified lake evaporation rate of 37.46 in/yr, which was derived from the average of the Class A Pan evaporation rates from Ruby Lake (51.46 in/yr) and UNR Beowawe Experiment Station farm (51.17 in/yr), multiplied by

a pan coefficent of 0.73 to convert the pan evaporation rate to a lake evaporation rate. Section 4.5.2.1 of the Modeling Report presents this explanation.

Letter 803, Comment 145

3.2.3.3. 2 Page 3-108: The DEIS improperly determined evaporative consumptive use as a beneficial use. The bulk of the consumptive use of the Project water comes from evaporation at the TSF and the pit lake. Neither the Nevada water law statutes nor the NDWR have ever defined (or we argue accepted) evaporation as a beneficial use. How is this consumption determined to be beneficial in the context of the EIS (if at odds with NDWR)? The DEIS must not inappropriately use terms that have very specific meaning according to Nevada state laws. Additionally, this evaporation of water is directly in conflict with our county Master Plan that mandates that water extracted for mining be used "in a manner that returns water to the ground in the same basin it is withdrawn with minimal evaporation and transpiration loss" (p. 6-55). Please revise to remove language of evaporation being a beneficial use and clearly state that the large evaporative losses of water due to the Project are inconsistent with our Master Plan.
Disposition: Comment acknowledged; does not provide new information

Response

Mining is a beneficial use under Nevada water law and the distribution of processed material in the TSFs are part of the mining use. Evaporation caused by the mining use of water is not contrary to Nevada law.

Letter 803, Comment 146

3.2.3.3.2 Page 3-108: The DEIS fails to get to the heart of the issue identified by Eureka County for both previous ADEISs (see 1772 and 1773) regarding locally defined adverse impacts. As we previously stated, we strongly request that the DEIS include the following language, "If monitoring detects adverse impacts to the overall groundwater available in Diamond Valley attributable to the Project, EML would implement the following mitigation measure." Then frame a mitigation measure to read, "EML would purchase and retire at least an equal amount of currently pumped water in Diamond Valley in coordination with the NDWR." As currently written in the DEIS that "changes are less than 0.1 percent" underscores why percentages do not always tell the whole story, especially for reductions in a severely over allocated basin. Significance must be directly related to the situation on the ground and BLM should weigh the current situation of over-appropriation (and permitted over-pumping) in Diamond Valley when determining significance. Any impact to Diamond Valley is considered adverse to Eureka County and Diamond Valley residents—the people and businesses most directly affected who rely on a tenuous water supply.
Disposition: Comment acknowledged; does not provide new information

Response

CC-051- Locally Defined Adverse Impacts

Letter 803, Comment 147

3.2.3.3.2 Page 3-109: The significance of this impact directly and perfectly meets one of the significance criteria outlined on p. 3-63 of "A long-term consumptive use of a water resource that does not provide a beneficial use." How does pit lake evaporation for perpetuity out of an over-appropriated and over-pumped basin not meet significance or require mitigation? The significance of this impact is the same as EML drilling a new well in Diamond Valley (or Kobeh Valley) and consumptively pumping it in perpetuity. BLM should require a mitigation measure: "EML will be required to permanently retire an equal amount of currently pumped water in both Diamond Valley and Kobeh Valley to offset the amount of groundwater evaporation out of the pit lake from each basin."
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 803, Comment 148

3.2.3.3.2 Page 3-109: The DEIS states "Diamond Valley...provides a useful analogue for estimating future potential impacts due to [subsidence associated with] increased pumping in Kobeh Valley under the Proposed Action." In Diamond Valley, fissures in and around the southern portion of the playa apparently related to groundwater pumping are located well beyond the 10 foot contour of drawdown associated with agricultural pumping. These fissures are also located outside of the areas of greatest subsidence. However, fissuring of basin-fill deposits in Kobeh Valley is said to be ". . . expected to occur in the areas of greatest subsidence (the KVCWF area)..." (p. 3-113). If Diamond Valley is truly an analogue for Kobeh Valley, fissures related to subsidence should be expected outside of the area of greatest subsidence and in areas where drawdown is due to wellfield pumping. Since the DEIS concludes Diamond Valley is an analogue for fissuring due to subsidence in Kobeh Valley, the DEIS needs to be modified to incorporate the occurrence of fissuring in Diamond Valley in areas remote from the areas of greatest subsidence.
Disposition: Comment acknowledged; does not provide new information

Response

CC-051- Locally Defined Adverse Impacts

Letter 803, Comment 149

3.2.3.3.2 Page 3-110: The analysis related to subsidence fails to acknowledge the fact that subsidence can collapse fractures or orifices that provide for spring/seep flow. Please include analysis to define the potential impacts related to this. The significance criteria outlined on p. 3-63 speak of modification of surface and groundwater flows that can both be impacted by subsidence yet there is nothing analyzed to address this. Also, as we have continued to point out multiple times over the past few years (see previous ADEIS comment 1780), there is no broad scale monitoring proposed to detect real subsidence as opposed to predicted subsidence. How will anybody ever know if there are subsidence related issues (in addition to simply looking for fissuring) attributable to mine pumping? Please add sentence to read, "EML would be required to implement broad scale subsidence monitoring using InSAR data to compare against subsidence prediction methodology. If monitoring detects subsidence that significantly alters aquifer storage or water flow paths, EML will be required to implement the following mitigation measure." Then frame a mitigation measure to address what would be required if the impact were found to be significant. One mitigation measure should read, "If it is determined that subsidence related to Project groundwater pumping changes the storage capacity or yield of any groundwater aquifer, EML will be required to offset the groundwater loss through retirement of currently pumped water rights."
Disposition: Comment acknowledged; does not provide new information

Response

There are no springs located within area of subsidence projected for the Proposed Action. Some compaction of inelastic storage (non-recoverable) is associated with all pumping of a significant magnitude that occurs in basin fill materials. However, the degree of projected subsidence from the proposed project is not expected to affect aquifer storage and production properties, based on substantially greater pumping in the adjacent Diamond Valley and no evidence of substantially affected aquifer productivity in that basin.

Mitigation Measure 3.2.3.3-8 outlines the monitoring for fissure gullies and mitigation for filling fissure gullies if they form.

Letter 803, Comment 150

3.2.3.3.2 Page 3-110: A simple statement and analysis that subsidence-related fissure gullies could damage "mining facilities" fails to address what would be required if the TSFs were impacted due to subsidence. The DEIS should disclose the real possibility that subsidence could be more serious than just some fissures to be filled with alluvium. Please frame what would be done if the TSF "mining facilities" experience subsidence. This is a major oversight.
Disposition: Comment acknowledged; does not provide new information

Response

The TSFs are constructed on areas composed of paleozoic stratigraphy and thin alluvial deposits. In addition, the subsidence associated with the predicted drawdown from Project pumping remains west of the bedrock ridge along Roberts Creek which is over four miles from the TSFs. There is not a resonable expectation for subsidence to occur in the areas of the TSFs. In addition, the alluvial deposits are likely too thin to develop fissuring.

Letter 803, Comment 151

3.2.3.4 Page 3-113: Previous ADEIS comments were not adequately addressed (see 1783). Under every impact associated with the No Action Alternative in section 3.2.3.4 there should be discussions on what third parties are currently doing to address the impacts. Irrigators in Diamond Valley are pursuing ways to conserve water and possibly retire water. (There has been formal formation of a conservation and working group, DNRPCA, to do exactly this). Also, EML themselves have formally created an Agriculture Sustainability Trust with a stated intention of retiring 11,300 afa of water. Further, Eureka County is (and has been working for almost 2 years) working on a comprehensive water resources plan and policy to address some of the over-appropriation issues. Because of these measures, impacts would not continue as is happening "currently." BLM responded to our previous ADEIS comments regarding the same by stating "The inclusion of ongoing activities…are not enforceable by the BLM and does not provide any relevant information from the BLM to use in their decision process." This statement cannot be taken as valid because the No Action Alternative is analyzed regardless of BLM jurisdiction.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

Although the activities described by the commeter may be ongoing, no approved plans or adopted policies have been provided to the BLM regarding these efforts. Inclusion of any of the targeted results in any of the alternatives would be purely speculative at this time. No change has been made to the EIS in response to this comment.

Letter 803, Comment 152

3.2.3.5 Page 3-127: Figure 3.2.26 is a good representation of why the Partial Backfill Alternative would prove necessary to protect the decreed water rights of Henderson Creek which, according to the recent 9th Circuit decision, cannot be impacted. This also shows that the dewatering has more effect on Pine Valley that previously discussed in the text. The DEIS speaks of water in the pit being derived from only Kobeh and Diamond Valleys, but this figure shows that there is a direct connection to groundwater in Pine Valley and that water that ends up in the pit comes from Pine Valley as well. Revise to make this clear throughout the document.

Disposition: Comment acknowledged; does not provide new information

Response

As stated in response to Comment #114 from Letter #803, diminution of surface water flows in the area of the projected 10-foot ground water drawdown contour from the Proposed Action is not anticipated, but conservatively included as a potential impact. Only the upper portion of Henderson Creek has a ground water connection (spring discharge) that supports a perennial base flow in the mountainous portion of the stream. This groundwater source is from the high altitude watersheds on the Roberts Mountains, as opposed to the Mount Hope area. Base flows provided from the springs are not sufficient in magnitude to provide a water source to the valley floor irrigation areas in Garden and Pine Valleys. Stream flow monitoring indicates that Henderson Creek at the points of irrigation diversion for the decreed rights is intermittent, becoming dry in the summer. However, Henderson Creek is observed to produce significant seasonal runoff associated with snow melt and precipitation, which is interpreted to be the source of water for the decreed water rights. This seasonal runoff source of flow would not be affected by the Proposed Action.

The Table 3.2-11 in the EIS correctly shows the projected changes in ground water inflow from Pine Valley as a result of the Project. These changes include 55 afy that would flow to Diamond Valley and 167 afa that would flow to Kobeh Valley. Some portion of this flow may report to the open pit.

Letter 803, Comment 153

3.2.3.5 Page 3-127: The EIS analyzes the maximum 10-ft drawdown for 400 years after mining ends for the Proposed Action. The EIS should provide the same analyze for the Partial Backfill Alternative to facilitate comparisons of similar timeframes.
Disposition: Comment acknowledged; does not provide new information

Response

Figure 3.2.26 shows the maximum extent of drawdown for the Partial Backfill Alternative.

Letter 803, Comment 154

3.2.3.5 Page 3-127: Figure 3.2.26 shows that the Partial Backfill Alternative has the potential to have less of an impact on the perennial flow of Henderson Creek and potentially may impact one less spring compared to the Preferred Alternative. The DEIS should not give short shrift to alternatives that have the potential for less impact on the environment, even if the alternative is not the Preferred Alternative.
Disposition: Comment acknowledged; does not provide new information

Response

The text in section 3.2.3.5.1 specifically identifies the springs that would not be affected by the Partial Backfill Alternative.

Letter 803, Comment 155

3.2.3.7 Page 3-145: Eureka County continues to be displeased that unlike many other aspects of the modeling effort, as a cooperating agency, Eureka County requested and was denied access to the model files developed to evaluate the Slower, Longer Alternative. A satisfactory explanation by the BLM and EML for this denial is requested to be provided here, since commenting on this Alternative has been and is hampered by this unprecedented denial of access to the model files.
Disposition: Comment acknowledged; does not provide new information

Response

The BLM has provided Eureka County extensive information on the hydrology modeling throughout the NEPA process. Eureka County was given access to the model files for the model runs that projected effects from the Proposed Action, and the county was able to run the model to scrutinize the predictions in detail. Eureka County was offered the opportunity to meet with EML's and BLM's hydrologists to observe and review operation of the model that was developed for the Slower, Longer Alternative. Eureka County was provided with copies of the various iterations of the hydrology modeling report and was given the opportunity to provide comments on this baseline report as it evolved throughout the NEPA process. In fact, numerous changes were made to this baseline report specifically to incorporate Eureka County's comments. Eureka County was provided with all of the other hydrology-related reports that were integral to the hydrology modeling, and was provided opportunity to comment on those reports. Thus, sufficient information has been provided to allow Eureka County to adequately review the impacts for the Proposed Action and alternatives, including the Slower, Longer Alternative, and all of those comments have been considered. Apart from asking to review additional information, the comment provides no indication that any erroneous conclusions stem from the modeling for the Slower, Longer Alternative. In fact, the modeling for this alternative, as summarized in the EIS, indicates that impacts would be similar to those of the Proposed Action, which is to be expected as the total volume of water pumped would be similar.

Letter 803, Comment 156

3.2.3.7 Page 3-145: Nearly every resource analyzed under the Slower, Longer Alternative speaks to impacts that would be the same, or similar to the proposed action. This is not a correct analysis of impacts. Impacts occur over space and time and the rate of the impact has a major bearing on its significance. The cumulative impacts may be the same, but it is the rate of impacts that would be tempered by the Slower, Longer Project and this would attenuate impact magnitude and potential significance. The DEIS's entire

analysis of the Slower, Longer Project is subjective, questionable, and goes against pure common sense because in all cases, it is determined that the impacts would either be the same, similar, or worse. The analysis appears to be framed in a biased way to lead the reader and the BLM to "come on board" with the Proposed Action. As we previously requested, please re-analyze in a fair and objective way in order to give more bearing and consideration to the day-to-day and year-to-year impacts as requested by the locally affected people and Eureka County.
Disposition: Comment acknowledged; does not provide new information

Response

The text in Section 3.2.3.7 states that impacts from the Slower, Longer Project Alternative would have "similar potential water quantity impacts as the Proposed Action (Section 3.2.3.3); however, these impacts would occur over different time frames due to the decreased ground water production on an annual basis, but over a longer time period." The analysis in the EIS discloses the full scope of impacts for each alternative and resource and cannot solely focus on the impacts over time frames such as daily or annual time periods. The BLM objectively analyzed the impacts of this alternative within the EIS and provided an accurate description of the impacts.

Letter 803, Comment 157

3.2.3.7.1 Page 3-146: Please add "and therefore, the day-to-day and year-to-year impacts would be less" to the paragraph to make it clear that the impacts "…shifted in time due to the timing of activities under this alternative" on a day-to-day basis would be less.
Disposition: Comment acknowledged; does not provide new information

Response

This section discusses impacts to Erosion, Sedimentation, and Flooding within Drainages. The concept in the comment of "less day-to-day impacts" does not translate to these types of impacts as the commenter has applied to other water production related comments on the Slower, Longer Project Alternative.

Letter 803, Comment 158

3.3 Page 3-169: One very concerning aspect regarding the geology at Mt. Hope that we have is the lack of acid neutralizing capacity. We do not believe that the analysis is adequate to conclusively make the determination that there will not likely be acid generation, acid run-off, or acid drainage. From our review, we believe that acid generation is possible in the pit lake and has a higher likelihood in the PAG WRDF. Without sufficient neutralizing ability, there is the potential for long-term water quality issues that must be addressed now to ensure enough financial funding is available and management options are contemplated to address this potentially perpetual problem.
Disposition: Comment acknowledged; does not provide new information

Response

CC-101-Waste Rock Characterization Adequacy

Letter 803, Comment 159

3.3.3.3.1 Page 3-198: Although the document now reads that the design plan would be submitted to BLM 24 months prior to construction, the change and action previously requested (see ADEIS comment 1811) were not fully addressed. This diversion structure would serve a valuable purpose in reducing the potential for surface water contamination and the design should be included and committed to in the EIS so that it may undergo public review. Please revise text to match response by BLM, primarily "The 24-month time frame was to allow sufficient time for the application processing by the BLM and the NDEP. This would be an amendment to the Plan and the BLM would conduct an appropriate level of NEPA analysis prior to approval." This will also show that even after 13 PoO amendments, more will be coming to address current shortcomings.
Disposition: Other (SEE RESPONSE)

Response

Public review will be accommodated during the process to permit this structure through BLM and NDWR (via the Dam Safety Permit process). No change has been made in the FEIS in response to this comment.

Letter 803, Comment 160

3.3.3.3.1 Page 3-205: Mitigation measure 3.3.3.3-2 that references Mitigation Measure 3.2.3.3-2 is not correct. Simply restoring flows to Roberts Creek will not ensure mitigation of degraded water quality. Stream water quality is composed of many complex factors including, but not limited to, dissolved oxygen, turbidity, temperature, and pH and the state of stream quality can change dramatically when thresholds are crossed. There needs to be analysis and description of how water quality would be replicated in addition to just providing flowing water.
Disposition: Analysis modified (SEE RESPONSE)

Response

Mitigation measures are designed to provide the same surface water resources and services, but mitigation does not require that the preexisting conditions be replicated exactly. Changes in water quality as the result of flow changes would not be an impact specific

solely to the proposal, but also result from natural flow variations and other sources of impacts. Should impacts result from the proposal, supplementing the flows near the source for the streams should provide comparable waters. This is based on the fact that any impact to stream flows, should it occur, would be the result of capture of spring fed sources that are connected to the regional ground water that was lowered by the Project. That is, the source of the affected surface waters would not be from precipitation and snow melt runoff. Should this impact occur, mitigation would consist of replacing the ground water-supplied surface water with ground water from the same general vicinity. Therefore, expected water quality impacts in the potentially affected reaches under the mitigation scenario are well within current levels of variation.

Letter 803, Comment 161

3.3.3.3.2 Page 3-205: "NAG" should be "Non-PAG"
Disposition: Factual correction made (SEE RESPONSE)

Response

This edit has been made in the FEIS.

Letter 803, Comment 162

3.3.3.3.2 Page 3-205: There is a sentence that is confusing and does not make sense. Please revise. Sentence currently reads, "Mn is already found at levels elevated above regulatory standards and above the level of Mn in ground water beneath the site." We are assuming that the document is trying to say, "Mn is already found at levels above regulatory standards in ground water beneath the site."
Disposition: Analysis modified (SEE RESPONSE)

Response

The text in the FEIS has been revised to read as follows, "Mn is already found at levels above regulatory standards in ground water beneath the site."

Letter 803, Comment 163

3.3.3.3.2 Page 3-205: Significance criteria speak to any degradation of water quality. Statements that since certain constituent levels are already above regulatory standards, there is no impact, are misleading and downplay potential impacts. The Proposed Action should be measured against the baseline to determine the impact, and in the case of many constituents, the Proposed Action does degrade the water quality (even if only further above the standard). Re-analyze to determine impacts related to the baseline and frame mitigation to address the degradation of water quality tied to the Project regardless of the status of the water quality now.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following text has been added to the end of the last paragraph in Section 3.3.2.2.2, "The samples of ground water from the Project Area consistently exceeded the Nevada reference values for Mn, with values that range from 0.0076 to 25 mg/L. Less frequent exceedances, but still numerous, were Fe, Al, pH, SO4, TDS, and F (SRK 2008a)." In addition, the text in the first paragraph under Section 3.3.3.3.2 has been revised to read, "Mn values are already found at levels above regulatory standards (0.0076 to 25 mg/L) in ground water beneath the site and the levels in the potential seepage would be simillar to the existing water quality values beneath the site. Therefore, the Mn in the draindown ...".

Letter 803, Comment 164

3.3.3.3.2 Page 3-206: Although there may be a "low potential for impacts to ground water quality due to drainage from tailings…and waste rock" there is still a potential for significant impacts. Please add "If drainage were to occur, the impact would be significant" and add a mitigation measure to address the impact. The DEIS must disclose the possibility of environmental impacts and not hide behind arbitrarily defined "potentials." The BLM NEPA Handbook supports our position by describing that "impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence…and is within the rule of reason." There have been examples of tailings dam failures due to catastrophic events throughout the world and here in the West. Therefore, it is within the "rule of reason" to be risk averse and expect that a failure could occur.
Disposition: Comment acknowledged; does not provide new information

Response

The analysis in the EIS does not support the commenter's conclusion of the significance of the impact. The NEPA does not require the analysis of hypothetical effects.

Letter 803, Comment 165

3.3.3.3.3 Page 3-206: BLM never responded to our review of the baseline geochemical modeling of the pit lake provided to BLM in November 2008 or our subsequent comments on the ADEIS. The DEIS fails to discuss or address our concerns related to the geochemical modeling effort. We are concerned with how dissolved oxygen was handled in the model. To elaborate, the dissolved

gas, carbon dioxide, was reasonably set fixed to sub-atmospheric equilibrium partial pressures. This was in contrast to dissolved oxygen, which instead of setting it fixed to a sub-atmospheric partial pressure, was tied to a fixed oxidation reduction potential (pe). This was done because setting the dissolved oxygen as an equilibrium phase resulted in extreme pe values that are generally not reflective of natural systems. However, this modeling effort also resulted in dissolved oxygen concentrations that are generally 30 to 40 orders of magnitude less than would be predicted in a lake open to the atmosphere.
Another potential modeling concern is that it was assumed that all of the ore (and reactive sulfides) would be removed during mining operations and that these ore materials would therefore not react with groundwater and surface water filling the lake. It is highly unlikely that all of the sulfides exposed during mining operations will indeed be removed. Additionally, exposure of these sulfides to dissolved oxygen, at concentrations indicative of most surface waters, would result in additional acid generation, metal leaching, and reductions in the adsorption of trace elements onto precipitated solids. During the sensitivity analysis, this concern was partially addressed through the use of groundwater inflow indicative of water quality collected from a well installed within the mineralized zone of the ore body, which resulted insignificantly lower pH and generally higher metals concentrations. Although direct oxidation of sulfides was not considered, the use of this groundwater may provide an indication of direct ore interaction with the resulting pit lake, provided the groundwater system is at a similar redox state as that expected for surface water. Additionally, we fully recognize that predicting the volume of such remaining sulfides is problematic, but some attempt to quantify the impact of any remaining acid generating material should be considered in the context of oxygenated waters.
In addition to the question raised above, the sensitivity analysis indicates that the predictive pit lake geochemical model is sensitive (some larger than others) to the scaling factor used, early and late stage leaching results, and the occurrence of mineralized water (from the ore body). Whatever the outcome of the model, it is our request that significant monitoring efforts be employed to assess the lake geochemistry, once mining operations have ceased, and that funding be reserved for corrective actions that may be required. Additionally, once mining operations begin, the dewatering chemistry should be tracked and the model revised, incorporating these "real" data, providing the mine and the people of Eureka County better foresight into how this system may look after mining operations have ceased. Additional efforts into quantifying the impacts of the effects of realistic dissolved oxygen concentrations within the pit lake and how this may affect pit lake geochemistry and potential sulfide oxidation should be considered, or at least the assumptions employed explained further and in more detail. At this time it is unknown as to whether such efforts will or will not result in a significant departure from the conclusions presented in the DEIS and we request further evaluation and discussion.
Disposition: Comment acknowledged; does not provide new information

Response

The pe and dissolved oxygen were considered on multiple levels for this model. Left unchecked, the model projects a pe level that is considered too high for a Nevada pit lake and approaches the upper stability for water. This was adjusted down in the model so that excessive amounts of oxide and sulfate minerals did not precipitate. One way to adjust the pe is to allow oxygen to come out of solution (from a few mg/L to zero mg/L). While dissolved oxygen was allowed to come out of solution, the overall lake redox potential was within a reasonable range. This resulted in a realistic and even slightly conservative estimation of mineral precipitation. Increasing the pe and/or oxygen levels would have resulted in additional metals mass being removed from the pit lake.

It was not assumed that all reactive sulfide material will be removed from the pit at the end of mining. On the contrary, Figure 3.3.10 of the FEIS indicates the areas of the final pit wall that have been defined as potentially acid-generating material (PAG) based on the reactive sulfide material content. The water quality of runoff/submergence from these PAG areas is included in the pit lake modeling.

Letter 803, Comment 166

3.3.3.3.3 Page 3-206: The analysis of the chemical quality of the pit lake water and pit lake water quality impacts state that several water quality standards will be exceeded although the overall quality of the water is expected to be generally good. This degradation is not expected to be significant because access to the pit by humans and livestock will be restricted and the mine does not intend to stock the lake with fish. Therefore, no mitigation is proposed. However, predicting pit water chemistry carries a level of uncertainty. For example, the pit water chemistry at Lone Tree has been different from predictions and more than $1,000,000 per month has reportedly been spent by Newmont attempting to positively affect pit water chemistry. The DEIS must explicitly state what will be committed to monitor the chemical quality of the pit and provide financial assurance to address mitigating unforeseen impacts to pit water quality. Please provide an analysis of measures to mitigate impacts to pit water quality.
Disposition: Comment acknowledged; does not provide new information

Response

Using the Lone Tree pit lake as an analogous condition does not recognize the significantly different hydrologic conditions at that location versus the Mount Hope location. The Water Pollution Control Permit issued by the Nevada Division of Environmental Protection - Bureau of Mining Regulation and Reclamation includes monitoring during operations and for up to 30 years following reclamation. The BLM can also require an Amended Plan of Operations and additional financial guarantees if conditions warrant.

Letter 803, Comment 167

3.3.3.5.1 Page 3-219: High runoff was a real concern with the pit wall runoff previously in the DEIS, but not considered in the TSF. This highlights why we believe it is unreasonable to wait for a TSF diversion structure design plan to come sometime in the future. Relying on a future plan does not address impacts that could occur. Please ensure that this plan is developed now and submitted for public disclosure and review prior to a ROD.

Disposition: Comment acknowledged; does not provide new information

Response

The EIS adequately analyzes the potential impacts from run-on into the TSF and discloses that construction of a diversion structure will be required to minimize this potential.

Letter 803, Comment 168

3.3.3.5.3 Page 3-220: States that "While a specific water balance has not been developed for the ground water entrained in the backfill, it is expected that this water quality would exceed Nevada drinking water standards." The table gives predicted backfill water quality at 210 years. However, on p. 3-221, 3rd paragraph, it states that "Eventually the throughflow water would resemble a mixture of upgradient ground water, percolation of precipitation through the backfill, and open pit wall runoff." Please add a sentence to clarify that the throughflow water will exceed Nevada drinking water standards.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been revised in the FEIS to read as follows, "Eventually the throughflow water would resemble a mixture of upgradient ground water, percolation of precipitation through the backfill, and open pit wall runoff, which would exceed Nevada drinking water standards."

Letter 803, Comment 169

3.4.2.4.11 Page 3-241: We believe extending the significant digits to more than one is correct in regards to the disclosure of "Up to 2.708 billion tons." See how BLM reporting of large figures here (3 significant digits) is at odds with usage earlier in section 2.1 in which we have made comments on both ADEIS and again here in the DEIS. When reporting such large amounts (billions) please report at least 2 significant digits.
Disposition: Comment acknowledged; does not provide new information

Response

It is standard scientific practice to use a specific number of significant digits depending on the accuracy of the data reported; therefore, uniformity throughout the FEIS is not required. Additionally, the BLM has determined that the accuracy of the figures in the FEIS is appropriate for the level of analysis.

Letter 803, Comment 170

3.4.3.3.2 Page 3-245: Relying on safety factors determined through analyses to make the confident statement that "there would be no impacts associated with geological hazards" is not a correct usage of safety factors. Analyses show that the facility would be stable under static loading but do not show that there is not any chance of a catastrophic earthquake causing failure. Please outline an impact stating "There would be a low potential for failure of embankments due to earthquake events. If failure were to occur, the impact would be significant." If there is a potential for an impact to occur, even if low, the DEIS must disclose it and frame mitigation to address it. The analyses did not state that there would not be an impact; the analyses support conclusions that the potential is low.
Disposition: Other (SEE RESPONSE)

Response

The analysis of failure, including the safety factors used in that analysis, is based on accepted engineering practices and incorporates the seismic risks for the project area. Static slope stability analyses were performed and showed acceptable factors of safety. In addition, a dynamic stability analysis was performed using the Maximum Credible Earthquake (MCE), which has a magnitude of 7.2 and a return period of 1,100 years. The dynamic analysis showed a permanent displacement of less than 12-inches. Less than 12-inches of displacement has been considered acceptable for lined facilities (Bray, 2007). Based on that evaluation, as well as extensive experience with similar facilities in the Battle Mountain District, the BLM has determined that the risk of a potential failure is low and that no specific mitigation for such a low probability event is required. Under BLM regulations, the Operator remains responsible for taking any measures to remediate the environmental impacts of unexpected events.

Letter 803, Comment 171

3.4.3.7.1 Page 3-248: The Slower, Longer Alternative could create impacts to mineral resources at a level less than the Proposed Action. Under a longer mining timeframe, there are more opportunities to better define the other mineral resources in the Project Area (i.e., Zinc) and to make shifts in operations to create less impacts to these resources.
Disposition: Comment acknowledged; does not provide new information

Response

The timeframe over which this alternative would occur does not affect the extent of the impact; therefore, the impact from this alternative remains similar to the impact from the Proposed Action. No change has been made in the FEIS in response to this comment. A change in the alternative that is described in the comment would require an amendment to the Plan of Operations, which is not included in the description of the Slower, Longer Project Alternative in the FEIS.

Letter 803, Comment 172

3.6 Page 3-254: Although analyses of air quality describe that the Project will not exceed the NAAQS (or NSAAQS), it is never recognized that the Project will, in fact, degrade the air quality of Eureka County regardless of a standard. This is in direct conflict with our Master Plan policy which is to prevent "deterioration of the superior air quality found in Eureka County." Please make this clear and describe what further can be done to protect the air quality of Eureka County through realistic and committed mitigation measures (and adequate monitoring to measure for degradation). Also it is never mentioned that the Project will limit the opportunities for future economic development and other industries due to raising of the ambient air "baseline" in Eureka County. Revise text to make this clear for our current and future citizens.
Disposition: Comment acknowledged; does not provide new information

Response

The FEIS recognizes that any anthropogenic activity, including the future economic and industrial development that the commenter mentions, would have some effect on air quality. In quoting Eureka County's Master Plan, the commenter has omitted the word "significant". A reading of the entire stated objective, "Prevent significant deterioration of the superior air quality found in Eureka County", shows that the Master Plan recognizes the possibility of air quality effects and that determining attainment of the goal is not quantified. The FEIS demonstrates that the Project will meet all applicable health-based standards and discloses the potential impacts to air quality. Inconsistencies with Eureka County Master Plan have been addressed in an appendix to the EIS.

Letter 803, Comment 173

Table 3.6-1 Page 3-255: The table is incorrect. The federal standard for 8-hour ozone is 0.075 ppm, not 0.75 ppm as stated
Disposition: Factual correction made (SEE RESPONSE)

Response

The table has been modified to reflect the correction.

Letter 803, Comment 174

3.6.2.1 Page 3-258: More than enough time has been available to collect local, onsite and area baseline air quality conditions in the vicinity of the project area. That "no air quality data have been collected at the project" calls into question the BLM's process and the conclusions in the DEIS regarding air quality where local data is needed for a project lasting nearly 50 years. It is especially of concern when local data could inform the federal decision making process to protect the health and safety of local affected communities. We question whether the Mercury-Desert Rock Station, nearly 400 miles from Mt Hope, at low altitude, in a warm desert, has comparable or usable data for the air dispersion modeling, especially for the winter months. The only justification provided is that the Nevada BAPC considers it to be representative of the area. Downwind rural communities of Diamond Valley and Eureka deserve better from the NDEP and the BLM. A partial remedy to this shortcoming is for BLM to work with NDEP to require installation of local monitoring stations now and collect local and on-site baseline data for the next 2+ years until the mine would be operable.
Disposition: Analysis modified (SEE RESPONSE)

Response

The air dispersion model has been revised, and the Final EIS will disclose the results of the updated model. This updated model uses meteorological data collected at Mount Hope.

Letter 803, Comment 175

3.6.3.2.2 Page 3-265: The receptors in the Jarbidge Wilderness Area and Great Basin National Park are more than 50 kilometers from the proposed facility. AERMOD is not recommended by EPA for distances greater than 50 kilometers. The CALPUFF model is currently recommended by EPA for these more distant receptors. Please revise the EIS analysis based on CALPUFF modeling.
Disposition: Comment acknowledged; does not provide new information

Response

In Nevada, AERMOD is accepted for use in mining EIS analyses including impacts to Class I airsheds at long distances, because it is a conservative approach. PSD sources are required to perform air quality analysis of Class I areas within a distance of 100 km of the project. Jarbidge Wilderness Area and Great Basin National Park (GBNP) (note that GBNP is a Class II airshed) are both greater than 100 km from Mt Hope. The receptors placed along the Jarbridge Wilderness Area and the GBNP were only modeled for information purposes. Further, the Q/D screening method from the 2008 Federal Land Managers' Air Quality Related Values Workgroup, shows that the Mt. Hope project is considered insignificant for both the Jarbridge Wilderness Area and the GBNP for the worst-case modeling scenario.

Letter 803, Comment 176

3.6.3.3 Page 3-275: Analysis and subsequently text and tables do not include pit scour wind erosion as a source of PM10 or PM2.5.
Disposition: Comment acknowledged; does not provide new information

Response
The revised AERMOD includes fugitive emissions from pit operations and is included in Section 3.6 of the FEIS. The model used sufficiently conservative approaches to modeling fugitive dust, including wind erosion inside the pit, to account for pit scour.

Letter 803, Comment 177

3.6.3.3 Page 3-275: Please add the acronym PC to the list of acronyms.
Disposition: Factual correction made (SEE RESPONSE)

Response
The acronym "PC" has been added to the list and defined as "Primary Crusher".

Letter 803, Comment 178

3.6.3.3.1 Page 3-276: The discussion in this paragraph concerning the potential impact of wind-blown fugitive dust that could result from lowering the water table is appropriate. However, it should be added that while acknowledged as a possibility, the DEIS did no quantitative estimate of the impact of this process. Therefore the model predictions and estimates of fugitive dust impacts discussed in the DEIS do not include the effect of vegetation loss from water table lowering. It is necessary for the DEIS to provide analysis of quantitative estimates of fugitive dust impacts related to lowering of the water table. For a recent analogue example of this estimation being provided, see the SNWA Pipeline DEIS from the BLM Ely District.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 179

3.6.3.3.1 Page 3-277: The conclusions regarding significance of impact are unsupported without the analysis completed that is necessary to quantify the impacts from fugitive dust from all sources, including the potential wellfield pumping impacts. This analysis is a necessary part of disclosing the full impacts of the Project.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 180

3.6.3.3.1 Page 3-277: The 1-hour average SO2 concentration is reported to be lower than the 3-hour average. We assume that this is likely due to the metric that is used to calculate the peak 1-hour SO2 impact (99% percentile value) versus the 3-hour impact, which is likely a peak value. However, further explanation is necessary in the DEIS to clarify this point.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-105-Modeled Air Quality Impacts

Letter 803, Comment 181

Table 3.6-9 Page 3-277: The basis for the 1-hour NO2 model impacts presented in the table has been discussed in a memorandum to Pat Rogers of Eureka Moly from Ejaz Memon from Air Sciences on October 18, 2010. Since the values in that memorandum are identical to those in the DEIS, we will assume that the calculations discussed in the memorandum are the basis for the values shown in the DEIS. It is our opinion that these methods have significantly under-estimated potential 1-hour NO2 impacts.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-126- Air Model Calculations

Letter 803, Comment 182

We believe that there is an error in the modeling that has resulted in showing that the facility can comply with the one hour NO2 standard. Air Sciences, in the memo from Ejaz Memon to Pat Rogers (October 18, 2010) that was attached to the Eureka Moly letter of October 28 to Angelica Rose at BLM says: "Source Characterization: The PVMRM method works with POINT sources only; therefore it was essential to recharacterize the VOLUME sources used in the NEPA Analysis as POINT sources for this analysis."
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-126- Air Model Calculations

Letter 803, Comment 183

The largest single source is the pit source which was correctly characterized as an OPENPIT type of source in the original modeling, but was changed to a POINT source in the 1-hour NO2 analysis. Air Sciences mistakenly thinks that PVMRM works only with POINT sources. This is not true. The problems with the PVMRM routine are with VOLUME sources only, not with AREA sources or OPENPIT sources. There was no reason to change the pit from an OPENPIT source to a POINT source – in fact it should not be a POINT source, it is obviously an open pit and is appropriately characterized as an OPENPIT source, not a smoke stack. If it is changed back to an OPENPIT source (for just that one source) the impacts jump from their reported peak of 143.8 micrograms per cubic meter (ug/m3) to 416.6 ug/m3. Since the ambient standard is 188 ug/m3, this obviously makes a huge difference in their conclusions. On the basis of the corrected Air Sciences' modeling analysis, the Eureka Moly project as currently proposed cannot meet the Federal one-hour NO2 standard.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 184

In a revised version of the Air Sciences Memorandum, dated April 4, 2011, Air Sciences has provided additional justification for their characterization of the pit source as a point source, rather than an OPENPIT source. However, the issues raised by Eureka County in were not corrected and still remain.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 185

The fundamental issue concerns how Air Sciences modeled the emission sources in the 1-hour NO2 analysis. The air quality model used in the analysis, an EPA model called AERMOD, allows the user to enter emissions into the model as a series of specific emissions sources of discrete types. The types at issue in this analysis are POINT sources, VOLUME sources and OPENPIT sources. Consistent with typical practices in modeling mining emission sources, in the NEPA Impact Analysis Mount Hope Project, June 2010, Air Sciences modeled the boilers, roasters and other "smoke stack" types of sources as POINT sources, but modeled all the mining sources, including the exhaust from the mobile equipment as either VOLUME or OPENPIT type sources. However, when the subsequent memorandum was issued for the 1-hour NO2 analysis, Air Sciences switched all emission sources to POINT sources, a switch that greatly reduces their impact. The reason for this switch was incorrectly stated by Air Sciences in the October version of the memorandum to be because they had chosen to use an option called PVMRM which was not previously used and that, "The PVMRM method works with POINT sources only."
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 186

This statement was incorrect as discussed above. The problem with PVMRM at the time was that VOLUME sources were incorrectly coded in the AERMOD model, but the problem was exclusive to VOLUME sources and not to any other type of source, including the OPENPIT source type. ENVIRON stated that the analysis should be re-done with the emissions for the Pit reset to the original OPENPIT source type.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 187

Air Sciences did not do this. They have continued to model the pit emissions as a POINT source despite the fact that they had modeled NOx emissions from these same sources in the NEPA analysis as an OPENPIT source. The added justification for making the switch to POINT sources relies on two factors: 1) a buoyancy issue that states that most of the NOx is from diesel exhaust which would be hotter than ambient air and hence subject to some buoyant plume rise, and 2) an argument that plume meandering due to terrain features is not implemented in the AREA source algorithm which they contend is also true for OPENPIT type sources. Neither of these points supports Air Sciences' POINT source approach.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 188

Buoyancy: The suggestion that a mobile piece of equipment would experience the same plume rise as a fixed smoke stack is incorrect. All the plume rise algorithms are based on a fixed smoke stack. Mobile sources are fundamentally different in that they move and the plume rise algorithms are completely inappropriate. A fixed emission source will have very different plume rise characteristics in windy conditions than in calm or low wind speed conditions. Since the mobile equipment is in motion, it does not experience calm and low wind speed conditions and the calculation of plume rise is incorrect. It is impossible to treat the plume rise from a mobile source with a fixed source plume rise equation. For this reason, as Air Sciences acknowledges, mobile sources are typically modeled as VOLUME sources, not as POINT sources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 189

Plume Meander: This point is not valid. The sources of emission within the pit are in motion throughout the pit and located in a different spot from minute to minute. To suggest that treating them as a fixed smoke stack at a particular location is more representative than an OPENPIT type of source which was designed specifically to address the distributed nature of the emission sources is very misleading. It is true that if the emissions were all at a fixed single location in the pit, the plume meander issue might be an important consideration, but given that the sources are in motion throughout the pit, the plume meander issue is moot and in any event would be a miniscule issue compared the incorrect location error induced by assuming all the emission sources are at the same spot. If what Air Sciences suggests is true, there would simply be no reason for having AREA or OPENPIT type sources in the model. The fact that they exist and were specifically created to treat emission sources which do not remain fixed in one location, but rather move from point to point over an area is clear evidence of the intent by EPA to treat emissions from an open pit using the OPENPIT source type, not the POINT source type.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 190

Fortunately, there is no reason to debate this issue. In the interim, EPA has issued a new version of the AERMOD model that corrects the VOLUME source problem with PVMRM, so there is no longer any reason to use the POINT source formulation. As Air Sciences correctly states, the EPA recommends using VOLUME sources for mobile equipment. ENVIRON still believes the OPENPIT characterization is more accurate for the pit sources than a VOLUME source approach, but certainly the haul roads and other mobile equipment can be readily modeled as VOLUME sources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 191

To illustrate how significant this improper treatment of the emission sources in the model is, ENVIRON has revised the model run which produced the peak impact by changing the emission source types for all of the sources that were switched to POINT sources and changed them back to VOLUME sources. The result is that impacts increase from 143.8 micrograms per cubic meter (µg/m3) to 318 µg/m3. The results go from being in compliance with the 1-hour standard to well in excess of the 1-hour standard without even including the background concentration. Mitigation must be required by BLM to bring these impacts below the level of non-compliance. Please ensure that this happens.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-126- Air Model Calculations

Letter 803, Comment 192

Finally, we understand from speaking to Craig Nicholls at the DEIS public hearings that the modeling will be redone to address these issues highlighted above. We were also promised that BLM would involve us and our air quality expert in the implementation of the model and discussions on the assumptions that will be used. We have yet to see any effort by BLM to follow through with this commitment. What is most concerning to us is that EML has reported to us that their air modeler is already working on the remodeling and is almost done. We request in the strongest terms that BLM keep us involved in the development of the model rather than relegating us to only review and comment.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-053-Air Quality Modeling

Letter 803, Comment 193

3.6.3.3.4 Page 3-278: Why were there not any sensitive receptors placed at any Diamond Valley residences, farms, or ranches? It is arbitrary to place a sensitive receptor at Alpha Ranch almost 15 miles to the north of the mine when dozens (nearly all) of the residences in Diamond Valley north of 6th street are as close, or closer, to the mine than Alpha Ranch. This includes the Romano Ranch, the Sadler-Brown Ranch, and the Bailey Ranch which are much closer than Alpha Ranch. Also, the Hay Ranch (Risi Ranch) in south Kobeh Valley (near Devil's Gate) is as close to Mt. Hope as the Alpha Ranch. What is worrisome to many Diamond Valley residents is that the prevailing winds blow towards Diamond Valley and many of the modeled highest pollutant concentrations are on the fenceline closest to Diamond Valley (Figure 3.6.4). Please describe why the sensitive receptor analysis is justified and why the bulk of properties nearest to the mine were excluded from analysis and disclosure. If the analysis was carried out correctly, the text that describes the highest concentrations to typically fall on Roberts Creek Ranch may be found incorrect.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-119-Diamond Valley Sensitive Receptors

Letter 803, Comment 194

3.6.3.3.2 Page 2-278: The conclusion regarding the significance of exhaust pollutant emissions is incorrect. When properly performed, the air quality modeling will demonstrate that 1-hour NO2 concentrations will be exceeded by the proposed mining operation. As a result these impacts are significant and additional mitigation is necessary.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-053-Air Quality Modeling

Letter 803, Comment 195

3.6.3.3.4 Page 3-284: Please double check Table 3.6-11 for errors. One apparent error that we found was the 1-hour NO2 reported at the Roberts Creek Ranch. The Table reports 46,245 but is likely 46.245.
Disposition: Factual correction made (SEE RESPONSE)

Response
This value has been updated.

Letter 803, Comment 196

3.7.3.2.1 Page 3-302 and Page 3 -303 (and related simulations on Pages 3-305 and 3-306): The colors described in the text are unclear in the photos because the photo and simulations are of low quality. Please improve the simulations to better and more clearly depict contrasts, colors, and lines.
Disposition: Comment acknowledged; does not provide new information

Response
CC-058- Visual Simulations

Letter 803, Comment 197

3.7.3.2.2, Figure 3.7.3b Page 3-307: KOP #2 depicts by far the most dramatic changes, including light pollution, but the analysis and description of light pollution there and east of KOP #2 is not adequate. Please better analyze and describe so local residents, especially in Diamond Valley, can determine what the visual impact to them will truly be.
Disposition: Comment acknowledged; does not provide new information

Response
CC-058- Visual Simulations

Letter 803, Comment 198

3.7.3.2.2, Figure 3.7.3d Page 3-308: The northeast portion of Mt. Hope and around SR 278 between Garden Pass and Diamond Valley are considered Class III areas. However, in Figure 3.7.3d, the "reclaimed" Non-PAG WRDF does not meet Class III objective "to partially retain the existing character of the landscape" as stated on page 3-298. Please require additional mitigation to ensure that there is realistic retention of "the existing character of the landscape."
Disposition: Analysis modified (SEE RESPONSE)

Response

The Non-PAG WRDF is on the western portion of Mount Hope and is, therefore, not within the VRM Class III area. Refer to Figure 2.1.13 for the location of this feature. A new figure has been added to Section 3.7 to illustrate the visual classes located within and adjacent to the Project Area. This figure also identifies the location of the Non-PAG WRDF.

Letter 803, Comment 199

3.7.3.2 Page 3-319: We are still concerned about the view of the Project, wellfield, and TSFs near Roberts Creek. We have continued to ask for better visual analysis from this area since mid-2009 and have seen no real effort by BLM to address our concerns (see previous letters regarding baseline analysis and comments on ADEIS that were not fully addressed especially in regards to this area). Many families use the historic and customary camping and fishing recreation area at Roberts Creek. The reason this area on Roberts Creek is used is because of its quiet setting and beautiful views of Kobeh Valley. The DEIS lacks information on the view of the mine, facilities, wellfield, and TSFs from this area, and no KOP simulation was done for this area. The current KOP in Kobeh Valley is over 10 miles away from the mine facilities and does little to inform the public of the true scope and extent of this project and the visual impacts that will occur in Kobeh Valley. Please simulate and analyze the view from the Roberts Creek area so users of this locally important area can have a full understanding of the visual impact of the mine from this treasured site.
Disposition: Other (SEE RESPONSE)

Response

Figure 3.7.1 of the EIS identifies those areas where the top of Mount Hope would be visible. Mount Hope is not visible from essentially all locations along Roberts Creek upstream of the ranch. In addition, the slopes on the east side of Roberts Creek, both upstream and down stream of the ranch shield the view of the tailings facilities portion of the Project from locations along Roberts Creek. The existing KOPs in the EIS provide an adequate range of representative views of the Proposed Action and alternatives. No changes have been made to the FEIS text to address this comment.

Letter 803, Comment 200

3.8.2.1 Page 3-329: BLM did not adequately address previous comments on both ADEIS (see 1854). In fact, BLM's response had nothing to do with the comment made. The analysis still has not looked at vegetation type, structure, and cover to assess "soil erodibility hazard potential". This needs to be done or all erosion potentials and predictions are extremely unreliable and indefensible. Soil erodibility (wind and water) cannot be adequately analyzed strictly through K values and WEG ratings. Each of these components is only a partial input into erodibility analyses. None of these study methods takes into account one of the most important and correlative factors--vegetation. Please update analysis using a correct methodology such as the Wind Erosion Prediction system (WEPS) and/or the Rangeland Hydrology and Erosion Model (RHEM) in order to adequately analyze erosion potentials.
Disposition: Analysis modified (SEE RESPONSE)

Response

The BLM has used the best available direct data for soils characteristics. References to the NRCS web soil survey has been added to the last three paragraphs under the study methods for soils in Section 3.8.2.1 of the EIS.

Letter 803, Comment 201

3.8.3.1 Page 3-339: Again, BLM failed to address previous ADEIS comments. There is still not a significance criterion to measure impacts related to water drawdown. BLM's perfunctory response to previous comments was that a sentence would be added to read "Within the area of the potential water table draw down in Kobeh Valley, soil erodibility will be assessed by looking at potential changes to the vegetation community." This response does not even address what the comments pointed to. BLM's own analysis of soil erodibility in the DEIS is based on K values and WEG ratings which fails to account for vegetative cover (which we believe is indefensible). However, if BLM is going to primarily rely on K values and WEG ratings for soil erodibility analysis then BLM must not overlook the fact that much of the erodibility rating is based on the water content of the soil. The water surface is very shallow at many of these areas which in turn keeps the soil wet and especially decreases wind erosion. If the water is drawn down, the surface soils will not stay wetted and there will be large amounts of wind erosion. Regardless of vegetation cover, the entire erodibility rating of these soils could change in the future strictly due to their water content. Further, these soils are very fine grained sediments. It is largely a function of being wet that keeps these soils from eroding from wind. This points out again how a 10-foot drawdown interval serves to downplay and minimize potential impacts. Please add a significance criterion of "Accelerated erosion in areas where vegetation or land productivity has declined due to Project related ground water pumping" and then carry out the necessary analysis to determine the impacts and frame valid mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-080-Fugutive Dust Emissions Mitigation

Letter 803, Comment 202

3.8.3.3 Page 3-344: We appreciate that the text now describes the potential impacts that could result from vegetation cover decrease due to Project pumping. However, there is still a failure to tie the decrease in soil moisture due to Project pumping, regardless of

vegetation decrease, to potential erosion. Please include additional text to read, "Much of the erodibility rating of soils is based on the water content of the soil. The water table surface is very shallow at many of these areas which in turn keeps soil moisture at the surface high and especially decreases wind erosion. If the water table is drawn down, the surface soils will not stay wetted and there could be increased wind erosion. Further, these soils are very fine grained sediments and it is largely a function of being wet that keeps these soils from eroding from wind."
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 203

3.8.3.3 Page 3-344: BLM's continued assertion that because of "committed operation performance standards, BMPs...this impact is not considered significant" is faulty logic and incorrect. EML has not committed or proposed any measure or BMP to address impacts related to phreatophyte loss, soil erosion, and increased fugitive dust in the drawdown area. Please outline a significance criterion, impact analysis, and mitigation for these potential impacts. These impacts would be significant because there is currently nothing committed in place that will (or can) reduce the impacts connected to phreatophyte loss, soil erosion, and increased fugitive dust in the drawdown area.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 204

3.8.3.3.1 Page 3-346: In the Residual Adverse Impacts, please discuss the potential permanent loss of topsoil that would occur due to increased wind and water erosion of soils under the project pumping drawdown.
Disposition: Comment acknowledged; does not provide new information

Response
The Project is not expected to result in a loss of topsoil in the areas of phreatophytes. Section 3.8.3.3 has been revised in the FEIS to discuss the change in soil condition from hydric to xeric. No additional change has been made in the FEIS in response to this comment.

Letter 803, Comment 205

3.8.3.7 Page 3-350: Again, the tone of the language used for the Slower, Longer Alternative works to bias the reader that this Alternative, in all cases, creates more impacts than the Proposed Action. However, under the Slower, Longer Alternative, impacts to vegetation and soils under the maximum drawdown would be less because although more area is within the 10-ft drawdown contour, there is less drawdown below root extinction depths. Please include this in the description when outlining impact analysis. Mitigation for this potential impact could create impacts to mineral resources at a level less than the Proposed Action. We request revising to read, "Although impacts from the Slower, Longer Project Alternative would occur over a period twice as long in duration compared to the Proposed Action, the day-to-day impacts would be less. Further, impacts to vegetation and soils under the maximum drawdown would potentially be less because although more area is within the 10-ft drawdown contour, less drawdown may occur below root extinction depths."
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 206

3.9.2.2.1 Page 3-359: Although it is not technically incorrect to refer to salt desert shrublands as "salt desert scrub" the current preference of the rangeland science community is a preference of "shrubland" rather than "scrub". See paper from West, et al (2008) that describes the outdated usage of "scrub" as an intentional label often carrying the connotation of "less ecologically important." Please do a global search of DEIS and change all references of "scrub" to "shrub" or "shrubland."
Disposition: Comment acknowledged; does not provide new information

Response
CC-099-Salt Desert Scrublands

Letter 803, Comment 207

3.9.2.2.1 Page 3-361: The NRCS ecological site description (ESD) is referenced here for big sagebrush/low sagebrush vegetation type, but not for any of the other vegetation types. Please reference the ESD for each vegetation type as these ESDs have much bearing on the current state and potential other states of vegetation.

Disposition: Analysis modified (SEE RESPONSE)

Response

The text in Section 3.9.2 of the EIS has been modified to include references to the ecological sites that occur within each vegetation community within the Project Area. Descriptions of the vegetation species as well as the percent vegetation composition for each ecological site has been added to the EIS.

Letter 803, Comment 208

3.9.2.2.1 Page 3-362: BLM's response on our previous ADEIS comment that "Figure 3.9.2 uses the best available data from the USGS on the location of the phreatophytes" is incorrect unless BLM considers the most recent data and reports by USGS to not be "the best available." The map of the phreatophytic vegetation on all figures, specifically 3.2.20, 3.8.1, 3.8.2, and 3.9.2 are at odds with updated USGS mapping of phreatophytes as we noted to BLM on both ADEIS and in our review of the hydrology baseline reports. The published USGS study of the Diamond Valley flow system shows a much different extent of phreatophytes than is depicted in the figure (available at http://pubs.usgs.gov/of/2011/1089/). Apparently, the field surveys referenced in the DEIS to define vegetation types fell short in defining phreatophytes. Of particular interest, one of the USGS phreatophyte ET instrumentation stations is in an area that the figures show as not having phreatophytes. Please update figures, text, and analysis with correct and updated information in order to disclose the true, full range of phreatophyte vegetation areas that could be impacted due to Project pumping.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 209

3.9.2.2.4 Page 3-364: The section on climate change in relation to vegetation change needs citations to back up the statements made regarding effects and impacts of climate change. Also, vegetation composition is not only integral to "native cultures", but also to rangeland health and other multiple-uses. This section focuses on impacts to Native American concerns. Please revise first sentence of 3.9.2.2.4 and add "rangeland health and other multiple uses" to reflect this. Also, please change second sentence to read "...availability of plants for traditional and multiple use purposes."
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-042-Climate Change

Letter 803, Comment 210

3.9.3.1 Page 3-365: There needs to be a significance criteria outlined for the BLM defined "indirect" impacts to vegetation resources that are impacted due to project pumping (see our previous comments related to the same issue).We request the second to last current criterion be changed to read, "Failure of reclamation or mitigation efforts...that protects directly disturbed or indirectly affected soil surfaces..." and the last current criterion to read, "Establish plant communities on the reclaimed areas or indirectly affected areas..."
Disposition: Comment acknowledged; does not provide new information

Response

The impact analysis includes both direct and indirect impacts. The language in the significance criteria captures both types of impacts.

Letter 803, Comment 211

3.9.3.3.1 Page 3-365: There is still a general downplay of impacts to phreatophytes, riparian vegetation, and wet meadows. This is a great example of how the impacts to private property are not disclosed or discussed. Take the meadows at Roberts Creek Ranch as an example. Where are the potential impacts to this agricultural base addressed? The analysis needs to be revised to account for the impacts to this agricultural land and the potential impacts to sub-irrigated meadows that do not require a water right because they are naturally irrigated through shallow and wet, saturated soils.
Disposition: Comment acknowledged; does not provide new information

Response

CC-132-Spring Mitigation on Private Land

Letter 803, Comment 212

3.9.3.3.1 Page 3-367: The DEIS still fails to acknowledge potential loss in riparian vegetation due to Project pumping. We are pleased that the DEIS acknowledges the potential for impact to phreatophytes, but are dismayed that the document falls short in acknowledging impacts to riparian vegetation and wet meadows due to water drawdown (i.e., spring complexes, seeps, streams). Therefore, the concluding statement by BLM that "Impacts to other vegetation communities as a result of drawdown are not expected" cannot be correct given that there are riparian areas and wet meadows that fall directly within the 10-ft drawdown that are predicted to be impacted. Please describe the potential impacts to riparian vegetation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 213

3.9.3.3.1 Page 3-367: Providing an "appropriate seed mix" will not address the impact. There are dozens of examples of efforts in Nevada where simple seeding does not and cannot replace vegetation in these areas. In addition to the minimal discussion of seed mixes, there needs to be analysis and discussion on what soil amendments and other reclamation measures would be successful in vegetating phreatophyte and salt-desert shrub areas. At the very least, there should be discussion that other measures may be necessary to re-vegetate these areas than simply seeding. Further, it is against common sense and reason to suggest that phreatophytes should be replaced with phreatophytes. This goes against the understanding of the hydrology and perennial yield of these areas and the fact that under the tenet of Nevada water law, the phreatophytes must be impacted. Remove language about replacing phreatophytes with phreatophytes.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 214

3.9.3.3.1 Page 3-367: Project pumping can also cause impacts to riparian vegetation and wet meadows. Change to read "Phreatophyte vegetation, riparian vegetation, and wet meadows would potentially experience water stress…Lowering of the water table in the area of phreatophytes or drawdown of water that sustains riparian vegetation or wet meadows would potentially cause a decline in those communities."
Disposition: Other (SEE RESPONSE)

Response

Potential impacts to riparian vegetation (and seeps and spring) and mitigation are discussed on under Impacts 3.11.3.3-2 and 3.11.3.3-3, and impacts to phreatophytes are discussed in Section 3.9.3 in the vegetation section.

Letter 803, Comment 215

3.9.3.3.2 Page 3-369: Just because a species wasn't located in the field by consultants doesn't mean that the plants are not there. It is incorrect for BLM to describe that an impact "could occur" and then require no mitigation because the plants weren't observed. Mitigation should be defined according to what impacts could occur not based on "no observations". For clarification, even though not observed, the plants could occur and be impacted. Surveys did not prove that these species were not located in the Project Area, only that they were not found or observed. Mitigation must be changed to describe what would be done if it is determined that Project activities impact special status plant species. Further, there must be monitoring employed to determine if these species are found in the area and if they are impacted. BLM and the public will never know what the impacts are if there is not monitoring to discern the impacts.
Disposition: Other (SEE RESPONSE)

Response

CC-070- Special Status Species Mitigation

Letter 803, Comment 216

3.9.3.3.2 Page 3-369: Again, if an impact to least phacelia could occur, there must be descriptive and specific mitigation to address the impact in addition to monitoring employed to determine if least phacelia are found in the area and if they are impacted. BLM and the public will never know what the impacts are if there is not monitoring to discern the impacts.
Disposition: Other (SEE RESPONSE)

Response

CC-070- Special Status Species Mitigation

Letter 803, Comment 217

3.9.3.3.2 Page 3-369: We appreciate that yearly monitoring will be required for impacts to the Monte Neva Indian paintbrush and request that this monitoring also be required on all other special status plants described in this section. However, mitigation must be specific and descriptive in order to weigh the true magnitude of impacts, including residual effects. It is not defensible, and is at odds with the intent of NEPA, to rely on EML and BLM to "develop" proper mitigation sometime in the future to address the impact. This mitigation must be disclosed now for all potential impacts to the Monte Neva Indian paintbrush and other special status plants.
Disposition: Other (SEE RESPONSE)

Response
CC-070- Special Status Species Mitigation

Letter 803, Comment 218

3.9.3.3.3 Page 3-370: Again, just because species were not observed does not mean that they are not there. Areas predicted to be impacted by water drawdown must be included as well in residual impacts. Many of these areas (i.e., riparian corridors) may be prime habitat for least phacelia and the plant may actually be currently present (just not observed during field surveys). The text continues to speak of "unoccupied" habitat but there is no way that BLM has been able to narrow down all areas of potential habitat that do or do not have these species. Change to read, "There is a potential residual indirect effect to special status plant species habitat whether currently occupied by these species or not."
Disposition: Other (SEE RESPONSE)

Response
Because the best available science indicates the three special status plant species do not occur in the project area, it is not necessary to suggest that residual indirect effects could affect these species.

Letter 803, Comment 219

3.9.3.7.1 Page 3-376: Indirect impacts to phreatophytes and some special status plant species under the maximum drawdown would be less under the Slower, Longer Alternative because although more area is within the 10-ft drawdown contour, there is less drawdown below root extinction depths. Please clarify this point in all of the impacts analyses under the Slower, Longer Alternative. BLM's response to our previous ADEIS comment on the same issue (1892) is indicative of the reason why an arbitrary 10-ft drawdown contour is inadequate for the proper disclosure and reasoning about whether other alternatives would reduce impacts of the Project. BLM responded, "Utilizing the criteria other than the ten-foot drawdown for this alternative would create an inconsistency in analysis between the alternatives." This response shows that the hesitation by BLM for anything other than the strict line on the map of 10-foot of drawdown is primarily because of the multitude of cascading changes that would have to occur throughout the analyses and document. This is also another example of BLM's failure to ever describe the Slower, Longer Alternative as being anything with less impact than the Proposed Action (the BLM's preference).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 220

3.10.1.3 Page 3-379: Please revise final sentence of 3.10.1.3 to read "In Eureka County, weed control is primarily discharged through Eureka County weed control under the County Department of Natural Resources and through the Diamond Valley Weed Control District." This clarifies that there is overall weed control countywide on top of the efforts of the Diamond Valley Weed Control District. In fact, the County treats as many weeds outside the boundaries of the Diamond Valley Weed District as inside.
Disposition: Analysis modified (SEE RESPONSE)

Response
The text in section 3.10.1.3 has been revised to read, "In Eureka County, weed control is primarily discharged through Eureka County weed control under the County Department of Natural Resources and through the Diamond Valley Weed Control District."

Letter 803, Comment 221

3.10.3.3 Page 3-380: Please revise to state that "hoary cress has been mapped in the SR 278 right-of-way that is encompassed by the Project Area boundary."
Disposition: Analysis modified (SEE RESPONSE)

Response
The first paragraph in the FEIS in Section 3.10.3.3 has been revised to read, "Although no noxious weeds were observed in the Project Area during the initial 2007 survey, weedy annual species including cheatgrass and halogeton were identified within the Project Area, and Russian thistle was located near the Project Area. Although Scotch thistle (Onopordum acanthium), hoary cress (Cardaria draba), and salt cedar (Tamarix ramosissima) have been mapped and treated by Eureka County in the vicinity, these species were not observed during initial surveys of the Project Area. Subsequently, hoary cress has been observed within the Project Area along roadsides within the Project boundary."

Letter 803, Comment 222

3.10.3.3 Page 3-380: Please revise final sentence on page 3-380 under 3.10.3.3 to "…would be coordinated with the BLM and Eureka County." It is necessary to coordinate weed control efforts with the County as required under state weed control regulatory mandates.
Disposition: Analysis modified (SEE RESPONSE)

Response
The sentence in the FEIS in Section 3.10.3.3 has been revised to read, "Implementation of this plan would be coordinated with the BLM, Eureka County Natural Resource Department, and Diamond Valley Weed Control District."

Letter 803, Comment 223

3.10.3.3 Page 3-381: The mitigation measure framed will do nothing to address areas where weeds or invasive species have already been introduced. There needs to be mitigation of treating the weed/invasive species first and then moving forward with vegetation seedings to stabilize the area and keep out or minimize re-establishment of undesirable species. Second, simply providing an "appropriate seed mix" will not address the impact. There are dozens of examples of efforts in Nevada where simple seeding does not and cannot replace vegetation in these areas. In addition to simple discussion of seed mixes, there needs to be analysis and discussion on what soil amendments and other reclamation measures would be successful in vegetating phreatophyte and salt-desert shrub areas. At the very least, there should be discussion that these other measures may be necessary to re-vegetate these areas than simply seeding. Further, it is impractical and inappropriate to suggest that phreatophytes should be replaced with phreatophytes. This goes against the understanding of the hydrology and perennial yield of these areas. Under the tenet of Nevada water law, the phreatophytes must be impacted. Remove language about replacing phreatophytes with phreatophytes.
Disposition: Analysis modified (SEE RESPONSE)

Response
Impact 3.10.3.3-2 has been revised in the FEIS to read as follows, "Phreatophyte vegetation, riparian corridors, and wet meadows would potentially experience changes in species composition and density due to the water table drawdown associated with ground water pumping and subsequent recovery of the water table. Noxious weeds as well as invasive and nonnative species associated with existing surface disturbance or those transported into the phreatopytes, riparian corridors, and wet meadows could potentially invade areas that experience changes in species composition and density.

Significance of the Impact: The impact is not considered potentially significant. Based on the results of the analysis, no mitigation for this impact is proposed."

This same edit has been made for Impacts 3.10.3.5-2, 3.10.3.6-2, and 3.10.3.7-2 in the FEIS.

Letter 803, Comment 224

3.10.3.3 Page 3-381: Revise last sentence to read, "…through appropriately re-vegetating areas that no longer support phreatophytes, riparian vegetation, or wet meadows." Mitigation highlighted in this section speaks to more than just phreatophyte areas.
Disposition: Analysis modified (SEE RESPONSE)

Response
The sentence has been revised in the FEIS to read, "… through appropriately reseeding to establish vegetation in areas that no longer support phreatophytes, riparian vegetation, or wet meadows."

Letter 803, Comment 225

3.10.3.3.1 Page 3-381: Please revise so residual impacts also speak to the residual indirect impacts as well that may occur due to Project groundwater pumping. The water resources monitoring plan must have a component of weed monitoring to account for impacts that may occur in these areas long after the mine has ceased to operate and reclamation is complete at the mine site.
Disposition: Factual correction made (SEE RESPONSE)

Response
The Plan of Operations, Appendix 13 - Noxious Weed Monitoring Plan has been revised to include areas impacted by ground water pumping. The text in the FEIS has been revised to read as follows "Implementation of reclamation and the noxious weed monitoring and control plan would reduce or eliminate the chance of noxious weed establishment and infestation (see the Plan, Appendix 13)."

Letter 803, Comment 226

3.10.3.7 Page 3-384: Please revise to describe that indirect impacts to phreatophytes under the maximum drawdown would be less under the Slower, Longer Alternative because although more area is within the 10-ft drawdown contour, there is less drawdown below root extinction depths.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 227

3.11.3.3 Page 3-387: Include language about the recreational importance of riparian and wetland communities. The bulk of the dispersed recreation that takes place on public land occurs in locations associated with water and riparian areas.

Disposition: Already addressed in planning documents

Response

These areas are discussed in the in Section 3.15.2.2.1.

Letter 803, Comment 228

3.11.3.3 Page 3-388: Mitigation measure 3.11.3.3-2 describes reducing impacts to phreatophytes but as we pointed out previously, impacts to phreatophytes must occur when pumping groundwater for another use, in this case mining. The large majority of the groundwater available under the perennial yield concept is only water that can be "salvaged" from ET of phreatophytes. Please revise to recognize this fact and to openly discuss the impacts to phreatophytes that must occur.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 229

3.11.3.3 Page 3-389: Since the mitigation highlighted here is actually the mitigation highlighted earlier in 3.2.3.3 (water quantity) please refer to our specific comments regarding 3.2.3.3 for requested changes here.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 803, Comment 230

3.11.3.3 Page 3-389: Please refer to our previous comments on the DEIS where we discuss this same issue and incorporate requested changes. At the very least, there should be discussion that other measures may be necessary to re-vegetate these areas than simply seeding and removal of language about replacing phreatophytes with phreatophytes.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impactst to Phreatophytes

Letter 803, Comment 231

3.11.3.3 Page 3-389: There needs to be analysis on and mitigation proposed for private property wet meadow impacts. Take the meadows at Roberts Creek Ranch as an example. Where are the potential impacts to this agricultural base addressed? The analysis needs to account for the impacts to this agricultural land and the potential impacts to sub-irrigated meadows that do not require a water right because they are naturally irrigated through shallow and wet, saturated soils.
Disposition: Comment acknowledged; does not provide new information

Response

CC-132-Spring Mitigation on Private Land

Letter 803, Comment 232

3.11.3.3.1 Page 3-389: Residual Adverse Impacts needs to speak of the difficulty of providing man maintained mitigation structures, facilities, pipelines, etc. well into the future, perhaps for perpetuity and address how this could be overcome through establishment of a long-term mitigation fund.
Disposition: Comment acknowledged; does not provide new information

Response

CC-094-Long-term Water Mitigation

Letter 803, Comment 233

3.11.3.7 Page 3-393: Indirect impacts to phreatophytes and some special status plant species under the maximum drawdown would be less under the Slower, Longer Alternative because although more area is within the 10-ft drawdown contour, there is less drawdown below root extinction depths.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 234

3.12.2.1 Page 3-395: Please revise to read, "Allotments are managed to maintain or make progress towards achieving rangeland health and grazing standards and guidelines and maintain and augment rangeland…"
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added in the FEIS under the BLM Standards and Guidelines for Livestock Grazing section, "BLM allotments are managed to achieve Northeast Great Basin Resource Advisory Council standards and guidelines." Additionally, the sentence stating "Allotments are managed to maintain and augment rangeland improvements . . . and fencing" has been deleted in the FEIS.

Letter 803, Comment 235

3.12.2.2 Page 3-395: It appears that the Livestock Grazing and Production section does not examine impacts (reduced forage) on private lands that support grazing. Please disclose the number of acres of available forage on private lands that are affected by the drawdown area. BLM should not exclude impacts to private lands especially those within the drawdown area.
Disposition: Analysis modified (SEE RESPONSE)

Response

Where there is the potential for the loss of forage on private land (which would include riparian areas associated with flowing streams and springs, wetlands, as well as areas of greasewood, rabbitbrush, saltgrass, and meadow grass) mitigation is identified in Sections 3.2.3, 3.9.3, and 3.11.3. This mitigation in water, vegetation, and wetlands indirectly addresses the potential loss of forage on private land. An exception to this is where there are springs located on private land that are within the ten-foot drawdown, the BLM cannot require mitigation be implemented. Therefore, there is a potential loss of forage associated with the loss of those specific springs.

Letter 803, Comment 236

3.12.2.2 Page 3-395: Not all of the allotments that fall within the 10-ft drawdown are described. There needs to be language clearly making the separation between direct and indirect impacts of the Project even if the same allotment may fall under both categories. Please revise to read, "The Project Area is located within six...and 3 Bars (Figure 3.12.1). Of these six allotments, all but the Ruby Hill Allotment have a portion of the maximum extent ten-foot ground water drawdown contour located within them. Although not located within the Project Area footprint, the Santa Fe/Ferguson Allotment also has a portion of the maximum extent ten-foot ground water drawdown contour located within it."
Disposition: Comment acknowledged; does not provide new information

Response

The analysis of direct and indirect effects for these allotments is included in Section 3.12.3.3 of the EIS. No revisions have been made in the FEIS in response to this comment.

Letter 803, Comment 237

3.12.2.2 Page 3-396: Please revise paragraph that begins, "In addition to the six allotments discussed above…" to also describe the acreage of the ten-foot drawdown contour in each allotment potentially impacted whether directly or indirectly. This would include the 6 allotments discussed above and the Santa Fe/Ferguson Allotment. Please revise to include the acreage of groundwater drawdown in every allotment potentially impacted by the drawdown regardless if any portion of the Project boundary is located within the allotment. BLM responded on the previous ADEIS comment that this was unnecessary because the impacts that could occur were addressed elsewhere in the document (e.g., water rights and vegetation). We disagree. This is the livestock grazing section and must specifically make the connection to impacts to grazing even if the document includes language to point the reader to other sections for analysis and mitigation. BLM further responded that "The specific acreage by allotment is not needed because vegetation communities (except phreatophytes) are not expected to be impacted by the groundwater drawdown" cannot be correct because there is forage appurtenant to riparian zones, springs, seeps, wet meadows, and sub-irrigated pastures that also within the water drawdown contour. Also, BLM continued that "impacts to overall AUM availability within the allotments as a result of the drawdown are not expected. Past experience has shown that a change in water table will result in a shift in vegetation community rather than a loss of a vegetation community" is misleading. Research within Nevada regarding this issue has concluded that the shift in vegetation community results in much less productive (i.e., less AUMs), desirable, palatable, and nutritive species of invasives—primarily cheat grass, tumble mustard, and Russian thistle. By focusing solely on AUMs, the DEIS fails to acknowledge the reality of impacts related to forage and habitat.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added to the text in Section 3.12.3.3 in the FEIS, "There are no phreatophytes on private land within the ten-foot drawdown." Mitigation Measure 3.12.3.3-2 has been revised to read, "Mitigation for the potential loss of water available for livestock from stock water rights and other surface waters are described in the Water Resources - Water Quantity impacts discussion (Mitigation Measures 3.2.3.3-2 and 3.2.3.3-3). Mitigation for loss of water available would also mitigate the loss of

vegetation (livestock forage). Additionally, mitigation identified for wild horses (Mitigation Measure 3.13.3.3-1) would also benefit livestock."

Letter 803, Comment 238

3.12.2.2 Page 3-396: Paragraph that begins, "The following BLM range improvements…" should be revised to also include the improvements that fall within the groundwater drawdown contour.
Disposition: Comment acknowledged; does not provide new information

Response

CC-030-Range Improvements

Letter 803, Comment 239

Further, please add language to speak to the infrastructure and improvements, including water developments, on private land that fall within the water drawdown contour. This is necessary given the recognized nexus between base property and BLM grazing allotments in statute and regulation. By granting a grazing permit, BLM has already made the determination that the private lands meet the criteria of base property outlined in Sections 3 and 15 of the Taylor Grazing Act. Basically, BLM must make the determination that the base property land and water rights must be capable of and can be used to support livestock for a specified period of time through production of crops, forage, and water. The EIS must make the connection to impacts to base property, land and water, as a recognized connection to grazing permits on BLM administered land. Regardless of this connection, NEPA (and associated regulations) calls for disclosure and framing of mitigation of all impacts even if out of direct BLM jurisdiction.
Disposition: Comment acknowledged; does not provide new information

Response

Section 3.12.3.3 in the EIS states that "no impacts to existing range improvements other than developed spring sites are anticipated." Implementation of water quantity mitigation measures in Section 3.2.3 would effectively mitigate any reductions in water available for use in rangeland management, including livestock grazing. With the mitigation measures in place, the potential impacts to base property rights noted in the comment are not expected to be a concern and no change to the EIS text is necessary. The BLM has also reviewed this question in light of many other mining projects in Nevada and has found no basis for the comment that base property rights (and associated range improvements on private land) can be adversely affected by mine dewatering where water quantity mitigation measures have been adopted.

Letter 803, Comment 240

3.12.2.2 Page 3-396: First paragraph on page. Please revise sentence to read "An AUM is the amount of forage required by an animal unit (cow/calf pair, five sheep, or one horse)…"
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in the FEIS has been revised as follows, "An AUM is the amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month." This is the definition provided in 43 CFR 4100.0-5.

Letter 803, Comment 241

3.12.2.2 Page 3-397: Figure 3.12.1 should show private lands within the drawdown area that support livestock grazing. In Section 3.12, include a discussion of private lands and the potential for forage to be impacted by groundwater drawdown. P. 3-401 discusses impacts and mitigation to grazing allotments due to groundwater drawdown but does not disclose similar potential impacts to private lands. Private land, forage production and grazing should not be excluded in the DEIS.
Disposition: Analysis modified (SEE RESPONSE)

Response

Where there is the potential for the loss of forage on private land (which would only include riparian areas associated with flowing streams and springs, wetlands, as well as areas of greasewood, rabbitbrush, saltgrass, and meadow grass) mitigation is identified in Sections 3.2.3, 3.9.3, and 3.11.3. This mitigation in water, vegetation, and wetlands indirectly addresses the potential loss to forage on private land. An exception to this is where there are springs located on private land that are within the ten-foot drawdown, the BLM cannot require mitigation be implemented; therefore, there is a potential loss of forage associated with the loss of those specific springs. The FEIS has been revised to include this impact.

Letter 803, Comment 242

3.12.3.2 and 3.12.3.3 Page 3-399: The methodology and analysis used determine loss of AUMs due to the Project (primarily through fencing) is indefensible and does not take into account the real availability of forage on the ground. When "an area is withdrawn for a single use" all other pre-existing multiple uses in the "withdrawn" area are to absorb the impact in a balanced way--not push the full impact to grazing. A simple geographical math exercise of taking total acreage divided by current AUMs is not based on the methods employed by BLM to adjudicate AUMs in the first place. Certain ecological sites have much higher amounts of forage per acre than

others. The NRCS soil surveys and ecological site descriptions (ESD) actually provide amounts of forage (lb/acre) that are potentially at each site. BLM should simply take the analysis in the soils and vegetation sections of the DEIS and analyze the amount of each ESD that is impacted to come up with AUMs impacted. Further, BLM regulation and the lawsuit Dahl v. Clark mandate how BLM justifies reductions in permitted numbers (suit was over wild horses but has implications across all permitted multiple uses). 43 CFR 4100.3 states "(b) The authorized officer will support these changes by monitoring, documented field observations, ecological site inventory, or other data acceptable to the authorized officer. (c) Before changing grazing preference, the authorized officer will undertake the appropriate analysis as required by the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 et seq.). Under NEPA, the authorized officer will analyze and, if appropriate, document the relevant social, economic, and cultural effects of the proposed action." The court found that wild horse numbers can only be reduced based on data collected on the ground and would apply to grazing as well. Therefore, BLM cannot simply make a calculation of acres impacted and reduce AUMs. There must be data to support any reduction in AUMs. Also, there is inconsistency to how grazing is treated versus wild horses. In this case, grazing is automatically going to be decreased because of 14,204 acres being fenced off. Wild horses will be fenced off of the same area yet there is no projected decrease in wild horse numbers. Therefore, the entire burden of directly lost AUMs will fall upon livestock grazing. This is also a specific example of the Proposed Action being in direct conflict with the policies of Eureka County as outlined in our Master Plan and County Code and this conflict must be described and documented in the EIS. Eureka County calls for no net-loss of AUMs. Please re-analyze to include ecological site descriptions and conditions on the ground defined by robust monitoring data before reductions in AUMs.
Disposition: Comment acknowledged; does not provide new information

Response

The suspension of AUMs resulting from this project was calculated using the same method as when they were originally allocated. As part of the 10-year permit renewal cycle, the BLM will conduct an Ecological Site Inventory. Since the mine proposal is not a grazing action, it is not being conducted at this time. No revisions have been made in the FEIS in response to this comment.

Letter 803, Comment 243

3.12.3.3 Page 3-399: Please revise text to make it clear that the minimum timeframe for loss of AUMs due to Project fencing will be 70 years. We request revising sentence in second paragraph of 3.12.3.3 to read "At that time, the area will be evaluated…can be returned. Based on this, there is a potential for the AUMs to be unavailable for more than 70 years with potentially some AUMs being unavailable into perpetuity depending on conditions that exist after mine closure and reclamation."
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added to the FEIS, "A total of 32 AUMs in the Romano and Roberts Mountain Allotments would be lost in perpetuity as a result of the open pit."

Letter 803, Comment 244

3.12.3.3 Page 3-400: We are pleased to see better and more accurate analyses of economic impacts. However, the analysis still fails to address our previous ADEIS comments and still fails to make the strong connection to impacts to individuals and family businesses, primarily the Etcheverry family at Roberts Creek Ranch. By lumping both the Roberts Creek and Romano allotments, there is minimizing and downplaying of impacts because EML owns the Romano Ranch and holds the grazing permit. Please revise to separate the impact to each ranch individually. None of these values represent inflationary adjustments since 2000 or projected into the future for 70 years (some sources today value the economic impact of 1 AUM at $75.00/AUM which equates to a loss of $4,126,500.00 over 70 years). There are indirect and induced impacts as well. Based upon information contained in the University of Nevada Reno Technical Report UCED 2005/06-14 Updated Economic Linkages in the Economy of Eureka County, the livestock sector in Eureka County has a final demand multiplier of 2.0283. In short this means that for every $1 generated by the Eureka County livestock sector, the County's economy will benefit by $2.02.. The high final demand multiplier suggests strong economic linkages of the livestock sector to other sectors of the county's economy. Income and employment multipliers are also of importance. The livestock sector has an income multiplier of 1.6812 and an employment multiplier of 1.4439. Thus, for every $1 generated by livestock production, total county household income increases by $1.68 and for every job added by the livestock sector, total employment in Eureka County increases by 1.44 employees. The BLM must take these multipliers and carry out the full analysis in order to adequately disclose and weigh the impacts to ranching operations. Additionally, although difficult to quantify, at a minimum the DEIS should disclose potential economic impacts related to a) reduced base property values and b) impacts to water sources that support grazing operations. Further, this entire analysis, when updated with the information that we have requested, must also go into the Socioeconomics section as it is currently not described there.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-089- Socioeconomic Impacts to Local Businesses

Letter 803, Comment 245

This is another specific example of the Proposed Action being in direct conflict with the policies of Eureka County as outlined in our Master Plan and County Code and this conflict must be described and documented in the EIS. These documents call for no net-loss of

AUMs and "mitigation of mining activities that may impair the economic future of Eureka County citizens." Since this Project will impair the economic future of Eureka County ranches, albeit only a few, it is inconsistent with our plans and policies.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-131- NEPA Compliance with Eureka County

Letter 803, Comment 246

33.12.3.3 Page 3-400: Although the economic value of grazing to the overall region is important, the analysis needs to discuss the economic consequences to the ranching family and the loss of income and contribution to ranch value which is critically important to discuss in this DEIS.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-089- Socioeconomic Impacts to Local Businesses

Letter 803, Comment 247

3.12.3.3 Page 3-400: It is improper for BLM to state that the permanent loss of 32 AUMs is "minimal." First of all, this is directly in conflict with Eureka County's Master Plan and County Code. Secondly, it is inaccurate for BLM to conclude that a few thousand dollars a year loss to an individual and a family business is negligible. Third, by strictly taking only inflation of 3% into account (which is the 20 year average reported by the Bureau of Labor Statistics) since 1999, the value of 1 AUM today is $1990.72. The amount is an ongoing economic loss that will last forever and must be mitigated. Please outline an impact and mitigation measure to address the permanent loss of AUMs. To address this, we suggest that Impact 3.12.3.3-1 can be simply revised to read "Project development and operation under the Proposed Action would result in the loss of up to 781 AUMs for approximately 70 years from the allotments within the fenced Project Area and up to 32 AUMs permanently from the development of the open pit." Mitigation would then be composed of language framed in our next few comments.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-089- Socioeconomic Impacts to Local Businesses

Letter 803, Comment 248

3.12.3.3 Page 3-400: This entire analysis, when updated with the information that we have requested in the related comments, must also go into the Socioeconomics section as it is currently not described there.
Disposition: Analysis modified (SEE RESPONSE)

Response

A reference has been added to the Socioeconomics section to direct readers to the Livestock Grazing and Production section for the discussion of economic impacts resulting from loss of AUMs.

Letter 803, Comment 249

3.12.3.3 Page 3-401: Please revise entire paragraph to also describe each allotment that may be impacted by the ten-foot drawdown contour. We request that the paragraph read, "Although the 14,204-acre enclosure would not directly impact AUMs within the 3 Bars, Santa Fe/Ferguson, or Lucky C Allotments, each of these allotments in addition to the Roberts Mountain and Romano allotment have a portion of the maximum extent ten-foot ground water drawdown contour located within them could have potential impacts to AUMs due to the possible impacts to forage and habitat related to ground water drawdown." The document currently focuses incorrectly on forage loss only in phreatophyte areas impacted by the water drawdown. See previous ADEIS comment 1907 that was not correctly addressed. BLM response that "vegetation communities (except phreatophytes) are not expected to be impacted by the groundwater drawdown" is not defensible and cannot be correct because there is forage appurtenant to riparian zones, springs, seeps, wet meadows, and sub-irrigated pastures that also within the water drawdown contour.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added in the FEIS, "Figure 3.12.1 illustrates the location of phreatophytes relative to the allotments within the Project Area boundary and the ten-foot drawdown contour." Additionally the text in the FEIS has been revised to read, "Impacts are not expected to other vegetation communities that do not rely on the direct connection to ground water."

Letter 803, Comment 250

3.12.3.3 Page 3-401: What must also be taken into account is that even with successful reseeding of impacted vegetation areas (phreatophytes, riparian vegetation, wet meadows, etc.) there is not a total removal of impacts to AUM availability. If an impact were to occur to vegetation due to the Project, the areas re-vegetated would likely be subject to BLM grazing closures until the area were to

meet BLM established objectives. Through no fault of their own, a grazing permittee would be impacted while re-vegetation efforts are taking place and would likely suffer large economic impacts. This has been seen in many cases where ranchers have had to reduce their herds strictly because of closure due to re-vegetation treatments on the ground. Eureka County has a policy of no loss of AUMs, even temporarily.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-122-Recovery of Temporarily Lost AUMs

Letter 803, Comment 251

3.12.3.3 Page 3-401: Revise to make it clear that EML will mitigate the impact to grazing permittees, not "would work" to mitigate the impact. We request the revision to read, "EML will fully mitigate and offset the loss of AUMs as a result of the Proposed Action by agreement with impacted grazing permittees. For purposes meant to inform the discussion between EML and the impacted grazing permittee, mitigation could include, but is not limited to: 1) Provide a livestock forage seeding on federally administered land on which the impacted grazing permittee is authorized to graze livestock or on private land owned by the impacted grazing permittee; 2) Provide an alternative livestock watering source in any area where forage was previously unused or underused due to lack of a viable water source on either federally administered land on which the impacted grazing permittee is authorized to graze livestock or private land owned by the impacted grazing permittee; 3) Implement a Rangeland Improvement Project on federally administered land on which the impacted grazing permittee is authorized to graze livestock or a project on private land owned by the impacted grazing permittee which would improve livestock production, forage availability, or rangeland condition (e.g., fencing, weed control, brush management, pinion-juniper thinning)." This language is consistent with (and nearly identical to) Eureka County's policy regarding AUM loss.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-114- Livestock Mitigation Measures

Letter 803, Comment 252

The DEIS also needs to examine the impacts to the value of the ranch operation as a result of a loss in the AUMs.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-089- Socioeconomic Impacts to Local Businesses

Letter 803, Comment 253

3.12.3.3 Page 3-401: There must be an impact and mitigation measure framed for impacts to livestock operations on private, base property (land and water).
Disposition: Analysis modified (SEE RESPONSE)

Response
Where there is the potential for the loss of forage on private land (which would include riparian areas associated with flowing streams and springs, wetlands, as well as areas of greasewood, rabbitbrush, saltgrass, and meadow grass) mitigation is identified in Sections 3.2.3, 3.9.3, and 3.11.3. This mitigation in water, vegetation, and wetlands indirectly addresses the potential loss to forage on private land. An exception to this is where there are springs located on private land that are within the ten-foot drawdown, the BLM cannot require mitigation be implemented; therefore, there is a potential loss of forage associated with the loss of those specific springs.

Letter 803, Comment 254

3.12.3.3 Page 3-401: Changes according to our previous comments regarding stockwater rights (subsisting rights and vested claims) and mitigation to address impacts to stockwater sources under the Water Quantity section of the DEIS must be incorporated here in the grazing section as well.
Disposition: Comment acknowledged; does not provide new information

Response
CC-031-Impacts to Surface Water Quantity

Letter 803, Comment 255

3.12.3.3 Page 3-402: Impact 3.12.3.3-2 states "Livestock dependent on existing water sources would potentially experience water stress due to water table drawdown . . ." Mitigation measures for these impacts are the same as those described previously for water resources – water quantity impacts (Mitigation Measures 3.2.3.3-2 and 3.2.3.3-3). 1) The triggers for mitigation are not consistent through-out the EIS. Where described in tables, the trigger is a cessation of flow. In the text narrative, the trigger is some unspecified reduction in flow; 2) many of the potentially impacted sources are associated with vested or decreed water rights. Nevada water law

does not allow a reduction in the water associated with these senior rights by a junior appropriator such as EML/KVR; 3) some of the mitigation measures require an inter-basin transfer of water from Kobeh Valley. There is no guarantee that permits for an inter-basin transfer can be acquired; 4) Proposed mitigation measures may take years to permit and put into use. There is no discussion of what happens in the meantime, either from the standpoint of the resource or compensation for the financial impact to the water right holder; 5) All of EML's mining and milling water rights are committed to consumptive use by the project such that EML does not have surplus water rights that could be used for mitigation; and 6) Proposed mitigation measures for impacts that occur after mining ceases for some areas require installation of wells with high peak yields. The DEIS states that the geologic materials in some areas are not considered to be a legitimate source of water supply because they are not particularly permeable. Therefore, many mitigation measures are merely fanciful. Please take all of our previous comments into account to revise to describe mitigation measures that are practical, feasible, and likely.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 803, Comment 256

3.12.3.3 Page 3-404: The current statement of "livestock resumption" is confusing and does not make sense. Revise last sentence on first paragraph to read, "…the BLM would evaluate re-permitting of AUMs for livestock grazing within the Project Area."
Disposition: Analysis modified (SEE RESPONSE)

Response
The sentence in the FEIS has been revised to read as follows, "Once vegetation has been successfully re-established (BLM/NDEP standards), the BLM would re-evaluate livestock grazing in the Project Area."

Letter 803, Comment 257

3.13.2.2 Page 3-411: As previously requested and not adequately responded to, please report the current post-foaling estimated population for each HMA separately rather than using the Roberts Mountain Complex as a whole (255 in Roberts Mtn. HMA and 52 in Whistler HMA which includes the estimated population in the Kobeh Valley HMA and northern portion of Fish Creek HMA). It is impossible to consider the impacts to localized areas without this specific information.
Disposition: Other (SEE RESPONSE)

Response
The information is presented as a complex because wild horses move considerably between HMAs; therefore, reporting as a complex is a more accurate representation of the impact.

Letter 803, Comment 258

3.13.3.3 Page 3-412: Project pumping and pit dewatering has the potential to create a significant impact to wild horse access to water (Impact 3.13.3.3-1, page 3-412). Mitigation Measure 3.13.3.2-1 provides an option for EML to provide water from the Project production wells which EML owns and operates. EML currently holds water rights for mining and milling purposes only and does not hold water rights to water wild horses. Because EML's testimony before the Nevada State Engineer clearly stated they required all of the 11,300 AF/year water for the Project, they do not have any surplus water to provide wild horses. Also, given Nevada water law, it is uncertain whether or not EML could obtain a water right expressly to water wild horses. In Nevada, there is a history of opposition to water rights for wild horses. As the BLM NEPA Web guide states, "If there is a history of . . . opposition to such measures, the EIS . . . Should acknowledge such opposition . . ." No such disclosure is provided in the DEIS for the Project. Please provide a discussion of the issues related to EML providing water to wild horses, including issues directly related to acquisition of water rights for wild horses and the mechanism for EML to acquire a water right to provide a source of water to wild horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-048-Water Mitigation for Wildlife and Horses

Letter 803, Comment 259

3.13.3.3.1 Page 3-412: The document currently focuses incorrectly on "indirect" potential wild horse forage loss only in phreatophyte areas impacted by the water drawdown. BLM response to our previous comment regarding the same issue that "vegetation communities (except phreatophytes) are not expected to be impacted by the groundwater drawdown" cannot be correct because there is forage appurtenant to riparian zones, springs, seeps, wet meadows, and sub-irrigated pastures that also within the water drawdown contour. Please change text to address the impacts to forage at all sources that could be impacted by water pumping, not just phreatophyte areas.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 803, Comment 260

3.13.3.3.1 Page 3-412: Eureka County has major concerns with the way the DEIS analyzes and addresses potential impacts to wild horses. We have brought up these concerns to BLM on both previous ADEIS as well as when we commented on the Wild Horse Mitigation Plan in 2008. First, although wild horses are a federally protected species, it does not mean that they are elevated above other multiple uses. The same logic that goes into not reducing horse numbers must apply to grazing AUMs as well. The mitigation to address wild horse impacts for "better" distribution also applies to livestock grazing and would reduce the same need to reduce livestock grazing. As previously noted, BLM regulation and the lawsuit Dahl v. Clark mandate how BLM justifies reductions in permitted numbers (suit was over wild horses but has implications across all permitted multiple uses). 43 CFR 4100.3 states "(b) The authorized officer will support these changes by monitoring, documented field observations, ecological site inventory, or other data acceptable to the authorized officer. (c) Before changing grazing preference, the authorized officer will undertake the appropriate analysis as required by the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 et seq.). Under NEPA, the authorized officer will analyze and, if appropriate, document the relevant social, economic, and cultural effects of the proposed action." The court found that wild horse numbers can only be reduced based on data collected on the ground and would apply to grazing as well. As reported in the DEIS, current AML in the Roberts Mountain Complex already is being exceeded with currently available water sources and forage and the fecundity of these herds shows no potential for impact under the Proposed Action. Further, there is a call for an increase in water availability from sources that are not currently being used, nor have been in recent years (or really ever). Document must be consistent in its approach across resources and multiple uses.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-091-Wild Horse Analysis

Letter 803, Comment 261

3.13.3.3.1 Page 3-415: How can EML obtain a water right to water wild horses when EML has no ownership of wild horses and would be disallowed under State Law? Also, EML improvement of current stockwater sources that have certificated (and some vested) rights and changing the use to wild horses is not consistent with Nevada Water Law or Eureka County's Master Plan and County Code. There needs to be more thorough description in the text (and Appendix C) describing the legal mechanisms to carry forward this mitigation as we believe it is unlawful. We believe the only way to address this issue is to allow improvement of existing water sources and development of new water sources for livestock and EML carry a stockwatering permit (either current or new application). Then, it must be acknowledged that although the water right that EML holds for these sources is for stockwatering, the mitigation is that all of these sources are maintained and made available for wildlife and wild horses (which is already the case on surface waters according to State Law under NRS 501 and NRS 533.367 and require no water right but mandates "customary access" to these sources for wildlife and by extension, wild horses).
Disposition: Comment acknowledged; does not provide new information

Response

CC-048-Water Mitigation for Wildlife and Horses

Letter 803, Comment 262

3.13.3.4.1 Page 3-403: Residual Adverse Impacts need to also speak of residual impacts to stock water sources, private base property that supports grazing permits (land and water), and socioeconomics.
Disposition: Analysis modified (SEE RESPONSE)

Response

Section number is incorrect - 3.12.3.3.1. The residual adverse impacts for water and socioeconomics are addressed in Sections 3.2.3.3 and 3.17.3.3. The residual adverse impacts for socioeconomics have been revised in the FEIS to include impacts to housing, population, economic conditions, and employment.

Letter 803, Comment 263

3.14.2.2 Page 3-422: Mentioning residences in Diamond Valley is an improvement, but lacks the specificity of the other ranches mentioned. Please provide a map to identify Diamond Valley residences being referenced.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text in Section 3.14.2.2 has been revised to include the following sentence. "The area in Diamond Valley with residences is shown on Figure 3.14.1." In addition, Figure 3.14.1 has been modified to include a shaded area for the locations of the Diamond Valley residences.

Letter 803, Comment 264

3.14.2.2 Page 3-422: Livestock grazing on "surrounding ranches" is not discussed in Section 3.12. This section and section 3.14 are void of meaningful discussion of impacts to private lands and ranches. Both sections need to incorporate discussion of private lands to adequately address these topics.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text in the FEIS has been revised to state "... Project Area and surrounding allotments ..." Also see the response to Comment #266 from Letter #803.

Letter 803, Comment 265

3.14.2.2 Page 3-422: This section needs to include a map showing land ownership in the project area and drawdown area.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-056- Land Uses on Private Land

Letter 803, Comment 266

Please provide a complete discussion of land uses on private lands in the drawdown area.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-056- Land Uses on Private Land

Letter 803, Comment 267

3.14.2.2 Page 3-422: DEIS must be updated with the most recent census data to adequately define the current baseline and existing conditions. There are still references to outdated demographic data. We previously made this same comment (see 1954) and BLM responded that "the best available data has been used." The 2010 census data has been available for over a year.
Disposition: Other (SEE RESPONSE)

Response

This section uses 2000 data only to illustrate the amount of BLM-administered land. Population information was based on more recent data from 2009.

Letter 803, Comment 268

3.14.2.2 Page 3-422: Despite our previous comments regarding the same issue, the DEIS speaks of Roberts Creek Ranch as being north of Mt. Hope. Please revise to state that the ranch is actually southwest from Mt. Hope.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-040- Ranch Locations Relative to Project Area

Letter 803, Comment 269

3.14.2.2 Page 3-422: Revise paragraph to report how many private properties are within the same distance to the mine as the Alpha Ranch (14.5 miles). The way the paragraph reads now is that only 3 residences are near the mine although the bulk of Diamond Valley residences are as close to Mt. Hope as the Alpha Ranch. In fact, the bulk of Diamond Valley residences are as close to Mt. Hope as the Alpha Ranch. The large majority of all residences outside of the town of Eureka—dozens—are as close to Mt. Hope as Alpha Ranch. This includes the Romano Ranch, the Sadler-Brown Ranch, and the Bailey Ranch which are much closer than Alpha Ranch and the Hay Ranch (Risi) that is as close.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-040- Ranch Locations Relative to Project Area

Letter 803, Comment 270

3.14.3 Page 3-425: There is no discussion of the termination or substantial modification of a land use, particularly to private lands. This significance criterion appears to be ignored by BLM. BLM limits its impact analysis to public lands even when the water drawdown affects private land holdings. See previous ADEIS comment 1128 that wasn't addressed. BLM cannot properly determine whether an impact is significant if it has not undertaken a complete analysis of impacts on private land. Please revise to analyze these lands and the potential impacts to land uses, both direct and indirect.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-045- Land Use Impacts

Letter 803, Comment 271

3.14.3.3 Page 3-425: This section on Land Use would likely be the place to discuss the connected actions of EML at the properties owned or controlled by General Moly. As an example, General Moly spent weeks processing gravel at the Romano Ranch for potential use we assume at the mine site. There will be added truck traffic on the County Sadler-Brown Road and SR 278 and potential hazards related to this increased traffic including, but not limited to, dust emissions, exhaust emissions, public safety, and impacts to an NRCS recognized and certified Centennial Ranch, the Bailey Ranch. The BLM must ensure that EML properly discloses everything that they will do in connection to the Project on their agriculture properties including the Romano Ranch, Heard Farm, and Bobcat Ranch. These connected actions need to be fully analyzed in order to weigh their contribution to the overall impacts related to the Project. Please revise analysis and EIS accordingly.
Disposition: Other (SEE RESPONSE)

Response
The BLM recognizes that additional traffic associated with Project construction is reasonably attributable to the Project and has been disclosed and analyzed in Section 3.24, Transportation and Access. EML has also included an estimate of additional traffic related to construction in the updated Plan of Operations. This information has also been added to Sections 2.1.9 and 3.24.2 in the EIS. Additionally, the following text has been added to Sections 2.1.9 and 3.24.2 of the EIS, "During construction, materials transported to the Project site would include gravel currently stockpiled at the privately owned Romano Ranch that would be used as aggregate in concrete. The Romano Ranch is located in Diamond Valley, and aggregate would be hauled by truck approximately seven miles on the Sadler Brown gravel road to the intersection of Highway 278, then north approximately three miles to the main access road."

Sources for other specific material and locations of additional traffic cannot be reasonably determined until contracts for construction work are finalized so use of this information to assess potential impacts to air quality from dust and tailpipe emissions is not practicable. In general, impacts are likely to be very similar to those identified for other traffic in the vicinity of the Project. Construction traffic impacts will also be sporadic and short term.

There are no activities at Herd Farm or the Bobcat Ranch that are related to the Project.

Letter 803, Comment 272

3.14.3 Page 3-425: As we pointed out on the ADEIS, although there is overlap with other analyzed resources, this section on Land Use must make the connection to these other land uses. The analysis needs to reference or describe other land uses including ranching, farming, grazing, hunting, fishing, other dispersed recreation (camping and day use) even if referencing analysis located in other EIS sections. Also, although there is some discussion in the mitigation about AUMs, the document does not appear address impacts to private base property grazing. Please include descriptions of these land uses while incorporating the comments that we have made regarding each specific land use (grazing, private land, recreation, etc.).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-045- Land Use Impacts

Letter 803, Comment 273

3.14.3.3.3 Page 3-429: The conclusion reached is incorrect. Eureka County plans and policies often cover private as well as public lands. Because the land use section of the DEIS excludes private lands, it is not possible for BLM to reach the conclusion of no conflicts with land use plans and regulations currently in place to guide development in Eureka County. Previous ADEIS comments from Eureka County as a Cooperating Agency have explained how the project is in conflict with the County's land use plans and regulations. Also, the last sentence refers to land use authorizations and not land use plans and goals. Land use authorizations were addressed in 3.14.3.3.2.
Disposition: Analysis modified (SEE RESPONSE)

Response
Section 3.14.3.3.3 has been revised to read: "Plans and regulations currently in place to guide development in Eureka County include the Eureka County Master Plan (2010); Titles 8 and 9 of the Eureka County Code; and the BLM's RMP (BLM 1986a). The Proposed Action would not conflict with any federal land use plans or regulations. EML's proposed use of public lands under the proposed action is reasonably incident under the BLM's occupancy regulations at 43 CFR 3715. Some elements of the Proposed Action would be in conformance with Eureka County plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies. Potential inconsistencies identified by Eureka County are disclosed in Appendix A with an indication if each conflict has been reconciled and either the method of reconciliation if it has or the rationale of the decisionmaker where reconciliation has not been achieved. The Proposed Action would not otherwise impact land use authorizations."

Section 1.5.4 of the FEIS has also been revised to include the following sentence, "The BLM acknowledges that EML would have to comply with any applicable Eureka County codes."

Letter 803, Comment 274

3.14.3.3.3 Page 3-429: First, this section fails to acknowledge or describe the County Code which carries force of law, much more so than county planning documents. As previously requested many times over the past few years, we ask BLM to fully review our County Code, County Plans and various County Resolutions and meet with us to discuss the policies of Eureka County before making consistency determinations. Second, we asked BLM to revise this section on both ADEIS. We again asked that there be an inclusion of language to read, "Some elements of the Proposed Action would be in conformance with these plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies." BLM's response was that "Based on a review of the County Plan, no specific instances of non-conformance were identified." BLM inaccurately cites general County policy support of mining and economic development in a vacuum without taking into account all other plans, goals, and policies as a whole related to impacts on air quality, wildlife, water resources, private property, grazing, etc. Again, we highlight the following policies, word-for-word, that components of the Proposed Action are in conflict with including, "use of the best available science and technology to ensure adequate protection of land, air, and water resources" including "adequate and proper mitigation; maintaining water resources in a condition that will render it useable by future generations for the full range of beneficial uses that further a viable and stable economic and social base for its citizens; maintain or improve soil, vegetation and watershed resources in a manner that perpetuates and sustains a diversity of uses while fully supporting the custom, culture, economic stability and viability of Eureka County and our individual citizens; mitigation of mining activities that may impair the economic future of Eureka County citizens; prevention of significant deterioration of the superior air quality found in Eureka County; and maintain, improve or mitigate…impacts to habitat in order to sustain viable and harvestable populations of…species as well as wetland/riparian habitat for…other game and non-game species." BLM can only say that the EIS is in compliance when the maximum effort has been taken by BLM to work with Eureka County, the guardian of its own policies, to reconcile these conflicts.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-025-Eureka County Plan Consistency

Letter 803, Comment 275

3.14.3.3.4 Page 3-429: It is inappropriate for BLM to continue to assert, as highlighted in BLM's response to our previous ADEIS comment (see 1961 among others) that "it is speculative to assert that the physical arrangement of Eureka would be disrupted or divided due to the project and the need for mine employee housing in Eureka." First of all, it is not just Eureka that we are concerned about disrupting and dividing; it is also Diamond Valley. Second, EML's failure to come to grips with the lack of housing availability and land availability to cover both temporary construction worker housing (nearly 500 people) as well as permanent employees (roughly 400 people not including secondary employment) magnifies our concern about potential ramshackle development and fragmentation of our agricultural valley in addition to bifurcation of the Town of Eureka. The DEIS must be revised to speak to the possibility of this actually happening and outline what will be done to minimize these impacts. This again is at direct odds with our Master Plan that calls for "orderly and common-sense development."
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-131- NEPA Compliance with Eureka County

Letter 803, Comment 276

3.14.3.7 Page 3-434: Again, the tone of the language used for the Slower, Longer Alternative works to bias the reader that this Alternative, in all cases, creates more impacts than the Proposed Action because impacts "occur over a period...twice as long." This analysis needs to be re-done in an objective manner to highlight the pure common sense that a Project half as big will have less impact, even if the impacts are not cut in half. "Although impacts from the Slower, Longer Project Alternative would occur over a period twice as long in duration compared to the Proposed Action, the day-to-day impacts would be less."
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-046- Slower, Longer Alternative Analysis

Letter 803, Comment 277

3.15.2.2.1 Page 3-442: It should also be disclosed that there is a limited availability of recreational water resources in Eureka County. Perennial streams in southern Eureka County are found primarily in the Roberts Mountain area. Major recreational surveys suggest that a vast majority (66%) of users travel less than 1 hour to outdoor recreation destinations (Outdoor Foundation, 2010). The Roberts Mountain area is within one hour of most locations in southern Eureka County. It provides a unique recreational opportunity that is not otherwise readily available to residents of southern Eureka County. Acknowledgement of this would highlight that and impacts to these extremely important, treasured, and rare resources must be avoided at all costs.

Disposition: Comment acknowledged; does not provide new information

Response

The survey conducted for Outdoor Foundation 2010 is not representative of the project area or rural Nevada and has not been used as a referenced source in the EIS. Section 3.15.2.2.1 accurately discloses the specific recreational opportunities in the vicinity of the Project Area. No changes the FEIS have been made as a result of this comment.

Letter 803, Comment 278

3.15.2.2.1 Page 3-442: We believe that the reported fishing on Roberts Creek of 17 anglers per year is very low. We have personal knowledge of many local families, composed of 4-6 people, fishing on Roberts Creek throughout the season. This would be on top of those non-local fishermen that use the area. Focusing on an average gives too much value to years where angler survey response was low or data was incomplete. Please revise to read, "Between 2000 and 2009, estimated fishing on Roberts Creek and Tonkin Reservoir included 17 and ...fish respectively. It was estimated by NDOW that the yearly high between 2000 and 2009 was 35 anglers at Roberts Creek and 250 at Tonkin Reservoir." We gathered these numbers from the same NDOW statistics summaries used in the DEIS.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in the FEIS has been revised to read, "... fishing use on Roberts Creek and Tonkin Reservoir averaged 17 and ...".

Letter 803, Comment 279

3.15.2.2.1 Page 3-443: We are pleased to see that Table 3.15-2 cites more recent numbers (2010 rather than 2006). The text on p. 3-442 still cites "…groups provided in the NDOW data (NDOW 2006)." Please revise to include most recent data in all cases and correct citations to be consistent with data used.
Disposition: Factual correction made (SEE RESPONSE)

Response

The reference citation has been revised to read "(NDOW 2010)".

Letter 803, Comment 280

3.15.2.2.1 Page 3-443: Please change "Eureka County Rodeo Grounds and Fair Building" to "Eureka County Fairgrounds." Also, the text describes this facility as being "located on the west side of Eureka" but is actually north of Eureka but contained within the townsite boundaries. Please revise accordingly.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text has been revised to read, "The Eureka County Fairgrounds, located at the north end of the Town of Eureka, provides ..."

Letter 803, Comment 281

Table 3.15.2 Page 3-443: Table 3.15-2 includes hunting units outside the project area presumably because there is a relationship between the Hunt areas and the drawdown, however there is no analysis in the impact section 3.15.3. Page 3-442 hunting paragraph 2 talks about the study area, but the analysis is limited to the Project area. This is confusing. Please rewrite to clarify what is meant.
Disposition: Comment acknowledged; does not provide new information

Response

Section 3.15.2.1 discusses the study area for recreation, which is not the Project Area. The text in Section 3.15.2.2.1 is consistent with the information in Table 3.14-2. The text in the FEIS has not been revised in response to this comment.

Letter 803, Comment 282

3.15.2.2.1 Page 3-444: We thank BLM for recognizing the importance of Roberts Creek as a unique and treasured local recreational resource. However, we are still concerned that the DEIS lacks specific impacts analysis and mitigation framed for Roberts Creek. Instead the DEIS describes in general language the potential impacts to Roberts Creek. It is necessary for BLM to follow through with specific analysis for Roberts Creek because a) it falls within the predicted water drawdown area; b) it is easily accessible and is the closest area to the mine and the main population base of Eureka; and c) the predicted impacts to Roberts Creek exactly meet at least one of the significance criterion. Further, although the DEIS cites previous sections to address impacts to Roberts Creek, BLM must apply our comments and requests for these individual sections to apply here. Eureka County does not want to see any impact to Roberts Creek. Impacts to Roberts Creek would be directly inconsistent with our Master Plan and County Code (see quoted text on p. 3-437). However, if impacted, at a minimum, mitigation must consist of 1) continued water flow to Roberts Creek; 2) comprehensive restoration activities to ensure habitat for fishing, hunting, wildlife viewing, and camping including re-vegetation, fishery stabilization, stocking of fish, and improvement of camping areas and access.
Disposition: Comment acknowledged; does not provide new information

Response

The EIS takes a hard look at potential impacts from groundwater consumption by the proposed project. Monitoring to provide advance warning of impacts would be required as part of project approval. Table 3.2-9 has been revised to make clear that mitigation may be required for Project-caused reductions, rather than "cessation" of flows for Roberts Creek. Enhancement or replacement of surface flows with ground water is one of the potential mitigation options, should impacts occur, as described in the EIS. The BLM may select other options from that list or identify other effective mitigation options, should impacts occur or be deemed imminent.

Letter 803, Comment 283

3.15.2.2.2 Page 3-444: The text describing the WSAs should describe the findings of BLM regarding the recommendation and rationale that was performed to determine whether these WSAs should be wilderness.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following text has been added to the first paragraph under Roberts Mountain WSA, "The BLM recommends 15,090 acres as suitable for wilderness designation." The following text has been added to the first paragraph under Simpson Park WSA, "The BLM recommends zero acres as suitable for wilderness designation."

Letter 803, Comment 284

3.15.3.1Page 3-444: Please define the terms "formally established" and "unique" recreational resource in the significance criteria. Why does a site have to be formally established to be a recreational resource? Please explain. Nevada has numerous and highly popular areas that have no formal designation but are heavily utilized nonetheless.
Disposition: Comment acknowledged; does not provide new information

Response

Formally established recreation areas can be consistently and accurately monitored to determine impacts. Dispersed recreation, due to its intermittence and geographic extent, would support only speculative quantification. No changes to the text of the FEIS have been made in response to this comment.

Letter 803, Comment 285

3.15.3.3.1 Page 3-445: Impacts 3.15.3.3-1, 3.15.3.3-2, and 3.15.3.3-3 have no mitigation proposed because "The impact does not meet the significance criteria listed." As we have pointed out earlier, mitigation should have nothing to do with significance. If anything can be implemented to minimize the impact, regardless of significance, BLM must prescribe it in the DEIS. Although we are generally opposed to off-site mitigation, in this specific circumstance on-site mitigation may likely not be available. We request that BLM revise the text and include a mitigation measure to read, "EML will mitigate the loss of acreage available for recreation within the Project Area (due to fencing or the development of the open pit) and the increased use and demand due to population growth attributable to the Project by providing funding to improve recreational opportunities in Kobeh Valley and on the Roberts Mountains. EML could satisfy this mitigation by providing funding, determined in coordination with BLM and Eureka County, for ongoing habitat restoration activities in the area (e.g., Roberts Mountain Wildlife Habitat Enhancement Project, Sulphur Springs Hazardous Fuels Reduction Project, and Southern Eureka County Wildlife Habitat Enhancement Project) that would promote enhanced fishing, hunting, wildlife viewing, and camping.
Disposition: Comment acknowledged; does not provide new information

Response

CC-134- NEPA Significance Threshold and Mitigation

Letter 803, Comment 286

3.15.3.2 Page 3-445: Assessment methodology mentions that the Proposed Action and alternatives were compared to the recreational planning information obtained from various sources, but the impact analysis really doesn't talk about such conflicts. Potential impacts to Roberts Creek and other streams in the Roberts Mountain would conflict with the 2010 SCORP and its emphasis on water resources. Although resource impacts related to this section are summarized in other sections, they should be summarized and discussed in this section for their relevance to recreational resources.
Disposition: Comment acknowledged; does not provide new information

Response

Section 3.15.3 accurately discloses impacts to recreational uses that are existing or planned. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 287

3.15.3.3.5 Page 3-446: If groundwater pumping activities decrease the flows to Roberts Creek, the effects would be direct, and the significance criteria would be met. Please acknowledge this and frame mitigation as we have previously outlined.
Disposition: Comment acknowledged; does not provide new information

Response
CC-044- Impacts to Roberts Creek

Letter 803, Comment 288

3.15.3.3.5 Page 3-446: Indirect effects is not consistently used throughout the DEIS. The potential decline in stream flows in Roberts Creek is directly related to water use at the mine. Impacts to the recreational fishery need to be monitored and appropriate mitigation established in the event the historic or existing levels of the use cannot be maintained. The DEIS lacks analysis of potential impacts to other recreational game species that may be affected by changes to water resources. The cross reference to related resource impacts such as hydrology is good, but there also needs to be a discussion on how it relates to recreation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-044- Impacts to Roberts Creek

Letter 803, Comment 289

The analysis must be redone to incorporate the sensitive receptors placed at residences that are much closer to the mine site than Alpha Ranch. Although p. 3-455 speaks of "Diamond Valley residences" as being sensitive receptors, there was no analysis to defend the conclusions about noise impacts to these residences. The bulk of Diamond Valley residences are much closer to Mt. Hope than the Alpha Ranch and the Risi Ranch. In fact, the bulk of Diamond Valley residences are as close to Mt. Hope as the Alpha Ranch. The large majority of all residences outside of the town of Eureka—dozens—are as close to Mt. Hope as Alpha Ranch. This includes the Romano Ranch, the Sadler-Brown Ranch, and the Bailey Ranch which are less than 10 miles to the mine compared to Alpha Ranch and Risi Ranch which are approximately 15 miles from the mine. Please re-analyze and disclose the results so that area residents will understand what the anticipated noise levels will be where the bulk of the population lives.
Disposition: Already addressed in planning documents

Response
CC-095-Noise Impacts to Residents

Letter 803, Comment 290

3.16.2.1 Page 3-455: Please revise language to clarify that all sage grouse leks near the Project Area and area of impacts, both direct and indirect, as sensitive receptors for consistency with further described analysis regarding specific impacts to sage grouse. Sage grouse leks match the definition of sensitive receptors as used in the DEIS.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 803, Comment 291

3.16.2.1 Page 3-455: We appreciate that there is now inclusion of language speaking to the constancy and duration of noise rather than just the level. However, there is no analysis, just these two sentences that fall short in providing adequate impacts analysis. The long term constancy of the noise more than justifies some type of analysis that takes this into account as well as the level of the noise. This would prompt another significance criterion and different possible impacts throughout all alternatives analyzed. See previous ADEIS comments regarding the same issue.
Disposition: Comment acknowledged; does not provide new information

Response
The noise analysis in the DEIS includes a discussion of the qualitative characteristics of consistency and duration. The existing significance crtieria for noise are sufficiently broad to incorporate these two qualitative characteristics. No changes have been made in the FEIS in response to this comment.

Letter 803, Comment 292

3.16.3.3 Page3-461: Under Mitigation Measure 3.16.3.3-4, please ensure that this mitigation measure is consistent with BLM's recent interim guidance on sage grouse habitat conservation. We believe that the mitigation framed is too contingent and broad to evaluate the impact and reduction of impact on sage grouse. Please provide more detail on what constitutes "best available...noise control equipment." Further, there must be limitation of noise not just during lekking but also during nesting.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 803, Comment 293

3.16.3.3.1 Page 3-466: Leks is misspelled "leaks"
Disposition: Factual correction made (SEE RESPONSE)

Response

The text has been revised to read "leks".

Letter 803, Comment 294

3.17 Page 3-467: In general, the socioeconomics section fails to recognize the social aspects of socioeconomics. Very important social issues such as custom and culture, perceptions of safety, social blight, and increased domestic issues can be overwhelmingly negative even when economics (i.e., local tax revenues) are positive. The actual impacts related to both economic and social aspects of the Project vary considerably within demographic groups. Please revise analysis to give more weight to the social aspects of Eureka County that may be impacted.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-002-Socioeconomics General Disruption

Letter 803, Comment 295

3.17.1 Page 3-467: 43 CFR 1506.2 does not require consideration but integration and where inconsistency exists, the EIS should describe the extent to which the agency would reconcile its proposed action with the local plan or policy.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-131- NEPA compliance with Eureka County

Letter 803, Comment 296

3.17.2.1.1 Page 3-468: The study area should make specific reference to Kobeh Valley.
Disposition: Analysis modified (SEE RESPONSE)

Response

The first sentence in section 3.17.2.1.1 has been changed as follows: "...focusing on southern Eureka County, particularly the community of Eureka and the nearby 3rd Street/Devil's Gate, Diamond Valley, and Kobeh Valley rural areas."

Letter 803, Comment 297

3.17.2.1.1, Table 3.17-1 Page 3-471: Eureka is 73 miles from Austin, not 93.
Disposition: Factual correction made (SEE RESPONSE)

Response

The mileage has been changed to "73".

Letter 803, Comment 298

3.17.2.2.2 Page 3-473: Census information on housing counts should now be available for 2010. Please update with most recent data and information.
Disposition: Other (SEE RESPONSE)

Response

The best available data was used in the DEIS, and the 2010 Census does not provide a breakdown on the specific types of housing units. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 299

3.17.2.2.3 Page 3-477: The EIS should disclose how much private land is used or provides pasture and water for grazing and is base property to support public lands grazing permits.
Disposition: Analysis modified (SEE RESPONSE)

Response

Section 3.17.2.2.3 (first paragraph on DEIS page 3-477) has been changed as follows: "Farm employment has experienced some volatility in recent times, declining for several years at the beginning of the decade, but increasing thereafter. As a consequence, farm employment in 2009 was reported at 159, a net loss of three farm jobs as compared to 2000. The National Agricultural Statistics Service (NASS) reported 86 farms in Eureka County in 2007, up from 73 in 2002 and 84 in 1997 (NASS 2009). Eureka County farmers and ranchers reported just over $25 million in agricultural product sales in 2007 and out of 17 counties in Nevada, Eureka

County was ranked fourth in the state in terms of crop sales and eighth in terms of sales of livestock, poultry, and their products. Aggregate sales rose to $32.5 million in 2008, declining to $26.5 million in 2009 (U.S. BEA 2010a; 2010b) Revenue derived from livestock sales generally account for 60 percent to 70 percent of the aggregate sales by local farms and ranches. Cattle account for most of the livestock raised in Eureka County with sheep and horses accounting for most of the remainder. In 2007, 48 out of the 86 Eureka County farms had cattle; 43 with beef cattle (NASS 2009). The seven BLM grazing allotments identified in Section 3.12.2.2 consist of approximately 545,000 acres of public land. In Eureka County as a whole, the BLM manages 1,880,486 public acres in allotments under term grazing permits. Approximately 40 ranching operators are permitted to use these public acres for livestock grazing (Rangeland Administration System [RAS]) (BLM 2012). The 2007 Census of Agriculture indicates that the 86 Eureka County farms cover 783,440 acres (of which approximately 727,000 acres are pastureland dedicated solely to grazing) up from 266,427 acres in 2002 and 201,077 acres in 1997. These land areas should not include public lands used by farms for grazing. Given that total non-Federally owned land in Eureka County is 564,557 acres, it appears that 2007 Census of Agriculture data on private farm acreage were inaccurate. The 1997 and 2002 figures (approximately 200,000 to 250,000 acres) may better reflect private farmland in the county."

Letter 803, Comment 300

3.17.2.2.3 Page 3-483: Much of the increase in public expenditures is attributed to outlays required to accommodate future growth associated with the Mt. Hope project. The DEIS largely overlooks the fact that Eureka County has allocated substantial financial resources to provide adequate facilities and services for the Mt. Hope population.
Disposition: Other (SEE RESPONSE)

Response

The best available data was used in the EIS to disclose total outlays. No specific breakdowns of expenditures for the Mount Hope Project have been provided by the County that demonstrates individual improvements being targeted at particular segments of the population.

Letter 803, Comment 301

3.17.2.2.5 Page 3-485: Increased storage capacity and water line installation was partly made in anticipation of the mining related population and the impact they will have on services. Development of spring sources is ongoing in order to provide redundancy through a water source other than the Diamond Valley aquifer.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 803, Comment 302

3.17.2.2.5 Page 3-486: Please add the following to the Solid Waste Disposal description: The current landfill site cannot be expanded due to the presence of mining claims.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added to the end of Solid Waste Disposal discussion in section 3.17.2.2.5: "Assuming rates of solid waste generation similar to the current community, the Project would decrease the expected 30-year life of the existing landfill to between ten and 20 years, accelerating the need for efforts to obtain the necessary permits for an expansion by obtaining control of existing mining claims or to secure a new location."

Letter 803, Comment 303

3.17.2.2.5 Page 3-487 and Page 3-488: The current jail contains 20 beds. Four units are reserved for pre-sentence inmates and four are reserved for females. Also, the Sheriff's office is responsible for transportation of inmates for health and medical services as well as to other courts of jurisdiction. Increasing that work load may require one full-time officer dedicated to transportation only.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added to the end of the Sheriff's Office discussion in section 3.17.2.2.5: "Also, the Sheriff's office is responsible for the transportation of inmates for health and medical services as well as to other courts of jurisdiction. Increasing that work load may require one full-time officer dedicated to transportation only."

Letter 803, Comment 304

3.17.2.2.5, Table 3.17-18 Page 3-489: Change the year in the title of Table 3.17-18 from 2007 to 2010.
Disposition: Factual correction made (SEE RESPONSE)

Response

The year in the title of Table 3.17-18 has been changed from "2007" to "2010".

Letter 803, Comment 305

3.17.2.2.5 Page 3-490: The Emergency Medical and Ambulance Service also respond to calls in adjacent counties including southern Lander County, southwestern White Pine County, and northern Nye County, further impacting the availability of services. Please provide a thorough description of this added burden.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following sentence has been added after the first sentence under the Emergency Medical/Ambulance Services subheading in section 3.17.2.2.5: "The emergency medical and ambulance service also responds to calls in adjacent counties including southern Lander County, southwestern White Pine County, and northern Nye County."

Letter 803, Comment 306

Table 3.17-19 Page 3-493: On page 3-472 the low point of the population coincides with suspension of activities at Ruby Hill Mine. During 2002-2003 the school enrollment also dropped. The population drop of approximately 260 resulted in a reduction in approximately 85 school age children comprising 32 percent of the population drop. Using the same ratio, a total long-term Project related population of 600 would potential yield about 190 students.
Disposition: Already addressed in planning documents

Response

CC-003-Socioeconomics School Enrollment

Letter 803, Comment 307

3.17.2.2.5 Page 3-496: It is not appropriate to limit impacts to grazing operators on only 2 BLM grazing allotments. Grazing and ranch operations associated with private lands will be affected in the drawdown area. BLM should not exclude from the analysis private land owners in the drawdown area or those directly affected by the Project. Please revise according to our previous comments regarding the same issue in the grazing section.
Disposition: Analysis modified (SEE RESPONSE)

Response

In the FEIS, the following sentence has been added to the first paragraph of Section 3.12.2.2 before the last sentence in the paragraph, "Associated with each of these seven allotments that are private lands used for livestock grazing and production."

Letter 803, Comment 308

3.17.3.3.1 Page 3-501: The secondary employment section lacks a discussion of in-fill jobs that will be filled by outsiders moving to the community or by spouses of Project employees. This information is contained in Appendix D and should be included in the text of the DEIS.
Disposition: Analysis modified (SEE RESPONSE)

Response

A footnote has been added in the Secondary Employment discussion in section 3.17.3.3.1 after the reference to Figure 3.17.4 as follows: "These jobs are soon to be filled by the following secondary employment groups: 1) indirect employment from jobs supported by EML and contractor purchases of goods and services from local and regional businesses; 2) induced employment from jobs supported by employee spending of Project-related income by businesses, local government, and school district spending in response to increased demand; and 3) in-fill jobs that would be filled by outsiders moving to the community or by spouses of Project employees. These secondary employment impacts are discussed in Section 3.17.3.3.2 and Appendix E."

Letter 803, Comment 309

3.17.3.3.1 Page 3-503: The last sentence of the second paragraph is only accurate as it relates to the project area and not Roberts Creek or other recreation potentially impacted by water drawdown. The streams on and flowing from Roberts Mountain offer unique recreational opportunities that are otherwise very limited in southern Eureka County. Based upon national surveys, most residents travel less than an hour's drive from their homes for recreation. Any impact to streams in the Roberts Mountain area would likely have some negative impact on the quality of life and recreational opportunities available to local residents and cannot be replaced by other sources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 803, Comment 310

3.17.3.3.1 Page 3-503: Section 3.12 only discusses the loss of AUMs based upon the fenced area of project. It does not discuss impacts to AUM reductions on other BLM allotments nor does the analysis discuss potential reductions of livestock numbers on

private lands due to loss of forage. Such reductions would occur as a direct result of forage and water loss. The mitigation used to address the impact is largely uncommitted and provides little or no assurance that such financial impacts to permittees are adequately address. The analysis in this section needs to address the economic impacts to individuals are well as the region as a whole. Economic or financial impacts have not been addressed. Instead there is a reliance on uncommitted mitigation to address the impacts. The projected reductions in AUMs might not be significant to the region as a whole, but they are significant to individual permit holders or others who face the prospects of reduced forage availability for their businesses. Please revise according to our previous comments regarding the same issue in the grazing section.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-034-AUM Reductions

Letter 803, Comment 311

3.17.3.3.1 Page 3-503: There is a statement that "The proposed project could impact groundwater levels in Kobeh Valley…" This section or some other section in the DEIS needs to estimate or quantify the extent of the impacts on future agricultural production. Currently it is not defined and therefore has no mitigation proposed to address any adverse impacts.
Disposition: Other (SEE RESPONSE)

Response
This impact has been disclosed in the Effects on Other Sectors of the Local Economy discussion in section 3.17.3.3.1.

Letter 803, Comment 312

3.17.3.3.1 Page 3-504: Although the impact analysis identifies several potential adverse impacts on page 3-503, such impacts are not recognized or mitigation offered on page 3-504. The loss of AUMs and reductions in agricultural production has very significant impacts to these individual small business interests and should be properly mitigated and made part of the monitoring program. The analysis needs to examine the loss of income from diminished agricultural production and the impacts it will have on the value of ranching operations in the impacted area.
Disposition: Other (SEE RESPONSE)

Response
The Effects on Other Sectors of the Local Economy discussion in section 3.17.3.3.1 already provides reference to mitigation in section 3.2.3.3 and Appendix C for the potential loss of water for irrigation.

Letter 803, Comment 313

3.17.3.3.2 Page 3-505: The discussion about daily commuters and the reliance upon housing options in other communities may no longer be valid. Transportation of workers to and from Elko to mines in northern Eureka County and the Battle Mountain area is becoming more and more difficult to sustain. The population effects associated with this DEIS need to recognize those changes and provide an appropriate range of potential impacts.
Disposition: Comment acknowledged; does not provide new information

Response
In their letter on the DEIS, the City of Elko stated, "... the City has the capacity to accommodate construction manpower associated with the Project with no required mitigation measures. With regards to longer-term housing for those permanent employees of EML who may choose to live in Elko, we are currently experiencing a shortage of residential housing. However, we believe that by the time the Mt. Hope mine ramps up to full operating employment in 2014-2015, residential housing construction in Elko will catch up with housing demand and no mitigating measures will be required."

Letter 803, Comment 314

3.17.3.3.2 Page 3-508: Eureka County believes that the population ranges established in the sensitivity analysis are still valid and should have been integrated more into the analysis of impacts given the uncertainties about employee place of residence instead of including discussions on higher or lower levels of commuting workers.
Disposition: Other (SEE RESPONSE)

Response
The sensitivity analysis has been adequately incorporated into the EIS text. Refer to Appendix E for additional details. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 315

3.17.3.3.2 Page 3-509: The discussion of higher levels of workforce commuting is largely unnecessary when appropriate ranges of population impacts are established. The current practice in the mining industry appears to be moving away from commuting to providing housing closer to the work site.

Disposition: Other (SEE RESPONSE)

Response

No data have been provided to support this possible trend. No change has been made to the FEIS in repsonse to this comment.

Letter 803, Comment 316

Impact 3.17.3.3-2 Page 3-509: It is important to note that population growth will have both positive and negative impacts and that such impacts will be discussed in other sections of the DEIS.
Disposition: Other (SEE RESPONSE)

Response

The text in Impact 3.17.3.3-2 states there are positive and adverse (negative) impacts related to population growth. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 317

3.17.3.3-2 Page 3-509: In Significance of Impact discussion, the last line states, "…no additional mitigation measures are proposed" which sounds like there are existing ones. If so, please describe and cite the committed mitigation measures.
Disposition: Analysis modified (SEE RESPONSE)

Response

The last two sentences of the Significance of the Impact section under Impact 3.17.3.3-2 have been revised as follows: "The impact has both positive and potentially adverse, short term and long term, attributes. Based on the conclusions from the analysis, no mitigation measures are proposed."

Letter 803, Comment 318

Table 3.17-23 Page 3-509: The table shows that only 16 percent of the relocating population is school aged children. Actual numbers associated with the suspension of mining at Ruby Hill suggest that the number of school aged children associated with a mining population could be as high as 32% resulting in more than 190 school children being associated with the Mt. Hope population. The 32 percent was derived by school enrollments and the population declines that occurred in the 2002-2003 timeframes.
Disposition: Other (SEE RESPONSE)

Response

The ratio of 16 percent of incremental school enrollment to relocating population derived by the commenter from Table 3.17-23 is based on the total population associated with the Mount Hope project. Total population includes weekly commuters who are assumed to travel to the Eureka area each week in single status and return to their homes outside of the Eureka area during their days off. These workers are assumed to be in the area without households or school age children. For the period covered in the table, weekly commuters are assumed to be 40 percent of the workforce. When considering only resident population (i.e., total population less weekly commuters), the analysis assumed the proportion of school age children to be 21 percent. This distinction has been clarified in the document. It should be noted that the current (2010) ratio of public school enrollments to resident population for Nevada counties ranges from 8.4 percent to 20.4 percent, while the state-wide ratio is 16.2 percent (Nevada Department of Education [2010]). Based on these state-wide county-level figures, the BLM's assumption of 21 percent is actually quite conservative with respect to typical ratios. Review of historical population and Eureka County enrollment data shows that this ratio has not exceeded 21 percent in the last 11 years. The BLM believes the analysis is based on the best available information. Enrollment trends in comparison to population during the full period of time the Ruby Hill Mine suspended operations and after operations resumed are also illustrative of this point. The year to year trends vary substantially and demonstrate the potential danger in using observed behavior in one year to predict future impacts.

Letter 803, Comment 319

3.17.3.3.3 Page 3-513: Workers are also likely to seek housing outside currently developed parcels. Additional parceling and land division might occur to accommodate new growth.
Disposition: Other (SEE RESPONSE)

Response

Comment noted. The analysis is based on the best available data. No change was made to the FEIS in response to this comment.

Letter 803, Comment 320

3.17.3.3.3 Page 3-513: Throughout the Housing Analysis and discussion of potential impacts, very little is said about EML participation in the housing issue. It will be difficult for the market to respond to the housing demands generated as a result of Mt. Hope employment during the construction phase and operations. Some of these workers could be living in a variety of situations which could pose health and safety problems or which represent substandard housing. Additionally, it is possible that construction workers could camp on public lands creating further impacts to resources. BLM needs to ensure that EML has a greater role in the

housing situation and not leave the entire burden for Eureka County to address. This is a substantial impact to a small community, more than doubling the size of the Town of Eureka.
Disposition: Other (SEE RESPONSE)

Response
CC-127- Socioeconomic Impacts to Eureka County

Letter 803, Comment 321

3.17.3.3.3 Page 3-514: Impact 3.17.3.3-3 is considered significant, but no mitigation is offered. BLM has the responsibility to frame mitigation and EML has some responsibility to provide assistance in this area and not rely upon Eureka County to address the entire issue.
Disposition: Other (SEE RESPONSE)

Response
CC-127- Socioeconomic Impacts to Eureka County

Letter 803, Comment 322

3.17.3.3.4 Page 3-515: The population associated with the project will create a substantial demand on community infrastructure by increasing the population of southern Eureka County by nearly 50 percent and potentially doubling the population that lives within the Town of Eureka.
Disposition: Other (SEE RESPONSE)

Response
Section 3.17.3.3.4 discloses substantial incremental demand on community infrastructure associated with the Project.

Letter 803, Comment 323

3.17.3.3.4 Page 3-516: The paragraph should also note that Mt. Hope related population increase will more than double the current demands on the water system resulting in the allocation of remaining storage and pumping capacity and potentially requiring Eureka County to seek additional water supplies to meet the demand. The Mt. Hope related population is expected to require 250 gallons per person per day (all uses) for a total requirement of approximately 170 acre-feet of water annually. Developing a new water sources is very expensive, especially when blended water sources must meet safe drinking water requirements.
Disposition: Already addressed in planning documents

Response
This impact has been disclosed in the Water Supply, Treatment, Storage and Distribution discussion in section 3.17.3.3.4.

Letter 803, Comment 324

3.17.3.3.4 Page 3-516: The analysis should note that at peak construction with 895 people, total sewage generated could easily reach 135,000 gallons per day (assuming all are served by municipal systems) which will require Eureka County to expand the wastewater treatment facility and effluent disposal. The permanent population will more than double the existing treatment requirements and will probably result in total flows reaching at least 120,000 to 150,000 gallons per day.
Disposition: Other (SEE RESPONSE)

Response
The Wastewater Collection and Treatment discussion in section 3.17.3.3.4 addresses this comment by accounting for an expansion to a total capacity of 200,000 gallons per day as a result of the Project.

Letter 803, Comment 325

3.17.3.3.4 Page 3-517: The current landfill site cannot be expanded due to the presence of mining claims. As a result, a new land fill site is needed. Eureka County will have to close the current site and provide on-going monitoring. A new site will have to be acquired, permitted and constructed. With the increase in solid waste generation rates associated with the mine and the time required to permit a new facility, Eureka County needs to begin the process to develop a new site in the very near future. This situation will result in substantial costs to Eureka County.
Disposition: Analysis modified (SEE RESPONSE)

Response
The first paragraph under the Solid Waste Disposal discussion in section 3.17.3.3.4 has been changed as follows: "...accelerating the need for efforts to obtain the necessary permits for an expansion by obtaining control of existing mining claims or to secure a new location."

Letter 803, Comment 326

3.17.3.3.4 Page 3-518: The DEIS is vague about law enforcement demands and challenges, particularly relating to the construction force. BLM should include comparative data from similar small rural communities that have had similar experiences with rapid growth for analysis purposes in the DEIS.
Disposition: Other (SEE RESPONSE)

Response

The BLM has used the best available data and no other existing data or studies have been identified or provided. No change has been made to the EIS.

Letter 803, Comment 327

3.17.3.3.4 Page 3-518: Paragraph two is mitigation. This paragraph should be included as an impact with appropriate mitigation and monitoring suggested.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following phrase has been added at the beginning of the first sentence in the second paragraph on under the Sheriff's Office discussion in section3.17.3.3.4: "As stated in Section 2.1.14, Operational Performance Standards, the..."

Letter 803, Comment 328

3.17.3.3.4 Page 3-518: There is a potential need to increase the size of the Eureka County jail facility or be willing to have an additional dedicated officer available for jail transport to Battle Mountain or Ely. The current facility has a capacity for 20 beds. Four of the beds are reserved for sentenced females, four for sentenced males, and 12 for pre-sentencing general population. The Mt. Hope project may increase the need for additional cells for sentenced males from 4 to 6 and an increase in the general population beds from 12 to 20 beds. Overall, the Sheriff anticipates that a 20 percent increase in jail capacity is warranted. During an interim period prior to jail expansion, the Sheriff's Office may need one dedicated deputy for transportation in the event of overcrowding occurs. Because of the long lead time for training and hiring, a decision needs to be made early about jail expansion so the Department can plan accordingly.
Disposition: Already addressed in planning documents

Response

The EIS discloses this impact in the last sentence of the Sheriff's Office discussion in seciton 3.17.3.3.4. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 329

3.17.3.3.4 Page 3-519: If EML intends to have emergency medical personnel on site during construction that should be included as committed mitigation. BLM must ensure that EML make a commitment to provide on-site EMS during operations as well. The total costs for Eureka County to provide EMS service is substantial and will require the addition of 3 full-time personnel, new equipment and possibly a new ambulance structure. Due to the time required for recruiting, hiring, and training new EMS staff as well as long lead times for the purchase of additional equipment, Eureka County will need to act as soon as possible to have capabilities in place prior to construction activity at Mt. Hope resulting in substantial expenditures of funds.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-016-Emergency Personnel

Letter 803, Comment 330

3.17.3.3.4 Page 3-519: Eureka EMS has already noted an increase in calls for service on SR 278 North of the project area. This can only increase as personnel begin to transit to and from the Project. Although EML "would not rely on the Diamond Valley or Eureka fire suppression or emergency response teams to provide primary response to the mine site" it will rely on Eureka EMS to provide treatment and transportation of injured or sick workers and/or contractors to medical treatment facilities, usually in Elko. Eureka EMS will also provide primary response to the increased traffic on SR 278, US 50 and the various calls for service driven by the Project. EML management has stated their primary response teams will be at best limited during construction. Proper mitigation which addresses the issue of on-site capabilities at the Mine site during operations needs to be developed and included in the EIS. Such mitigation measures might require EML to provide its own service and medical capabilities at the mine site or contract for those services with Eureka County and/or the health clinic.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-016-Emergency Personnel

Letter 803, Comment 331

3.17.3.3.4 Page 3-519 and Page 3-520: "Eureka County EMS is staffed largely by volunteers." At this time Eureka County EMS has one FTE (the EMS Coordinator) and one part time position authorized in the South service area. All other personnel are volunteers from the community. Only one works in mining. The DEIS appears to assume that volunteer recruiting will increase and be large enough to provide service for the rapidly expanding population base. "Although mine operations workers would likely join these volunteer agencies, few construction workers are likely to do so; consequently, EMS services may be strained during the construction phase of the Project." There is no evidence that mine operations workers will join EMS. Project operations workers will be minimal during construction; even if currently certified, licensing can be a protracted process; and additionally many employers will not permit their employees to be absent or late for work due to volunteer activities. Although the Project may have EMT or EMR personnel on site, many sick or injured will request or require ambulance transport to local or non-local medical facilities for diagnosis and/or treatment. Transportation to a hospital requires a trip of about 4 hours for the responding volunteers; many employers will not permit their employees to be absent for such a long period of time. It implies that the early replacement of an older ambulance and training and equipping the volunteers will be the only impacts. At this time Eureka EMS plans on at least 3 FTE to augment the volunteers as well as additional equipment. This must occur prior to the influx of construction workers due to the time required for recruitment, training and equipping new employees.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text in the second sentence under the Emergency Medical/Ambulance Services discussion in section 3.17.3.3.4 has been changed as follows: "Although mine operations workers may join these volunteer agencies...EMS services may be especially strained during the construction phase of the Project."

Letter 803, Comment 332

3.17.3.3.4 Page 3-520: The Eureka Clinic is extremely limited by available diagnostic equipment and technique. This causes the referral of patients to hospitals and diagnostic centers. Often patients are transported by ambulance. The two closest hospitals are in Elko and Ely. Difficult, critical and trauma cases are often flown directly to Reno or Salt Lake City, when weather permits. Although Eureka County heavily subsidizes Clinic staffing, operations and provides/maintains the building, historically the contractor has been unable to provide consistent qualified staffing. Eureka EMS then becomes the medical provider of last resort. The next closest clinics and physicians are located in Ely (78 miles) and Elko (113 miles).
Disposition: Other (SEE RESPONSE)

Response

The limited nature of the medical services located in Eureka County is disclosed in the Healthcare discussion in section 3.17.2.2.5. The EIS acknowledges the staffing difficulties and the potential impacts that would result from the increased population seeking medical services. Some of the transportation needs may be offset by the ambulance service that will be on-site at the project during operations.

Letter 803, Comment 333

3.17.3.3.4 Page 3-520: Paragraph 3 states that the rural standard is one physician for every 1,500 people. Southern Eureka County is 1325 plus the addition of the operations population plus other workers at the mine site who don't live locally, and service and support contractors who will be in the area pushes the total population well above 2000. Health care impacts should require some type of mitigation discussion and commitment by EML.
Disposition: Analysis modified (SEE RESPONSE)

Response

The fourth sentence in the second paragraph under the Healthcare discussion in section 3.17.3.3.4 has been modified as follows: "...the incremental growth may warrant the addition of another full-time physician at the clinic, and may require an increase in support staff."

Letter 803, Comment 334

3.17.3.3.4 Page 3-521 and Page 3-522: The estimated enrollment increases are still too low. We should anticipate that the new permanent workforce would have as large, or larger, a percentage of school age children as the current population since it includes no retirees.
Disposition: Already addressed in planning documents

Response

CC-003-Socioeconomics School Enrollment

Letter 803, Comment 335

3.17.3.3.4 Page 3-522: Again this discussion is unnecessary when using a range of population estimates. As mentioned in earlier comments about school age children, it appears that school age children comprised approximately 32 percent of the population declines during 2002 and 2003. The socioeconomic analysis assumes a much lower percentage.

Disposition: Already addressed in planning documents

Response

CC-003-Socioeconomics School Enrollment

Letter 803, Comment 336

3.17.3.3.4 Page 3-522 and Page 3-528: Eureka EMS can expect a much higher rate of calls for service due to the increased passenger traffic along with increased heavy truck traffic in the area. In particular, a low probability/high impact event, such as a motor vehicle accident involving a commuter bus will exceed present and planned response capability. Exacerbating the risk of a low probability/high impact event as well as "ordinary" severe motor vehicle accidents are: the design and maintenance of SR 278 including lane width and the lack of shoulders, increased heavy truck traffic mixed in with other motor vehicles, increased fatigue of drivers, particularly on "end of shift" days and low state law enforcement priority resulting in an increase in risky driving behavior.
Disposition: Analysis modified (SEE RESPONSE)

Response

The last sentence in the first paragraph under Effects of Higher Levels of Workforce Commuting discussion in section 3.17.3.3.4 has been updated as follows: "Additional law enforcement and emergency response services could also be generated along transportation routes, specifically along SR 278, from host communities to the Project for both construction and operations workers."

Letter 803, Comment 337

3.17.3.3.4 Page 3-523: The impact analysis ignores a variety of potentially significant impacts and provides no mitigation. The format attempts to aggregate all the impacts and mitigation measures of section 3.17.3.3.4 into one catch-all discussion. This approach is taken throughout a number of resources topics. This approach fails the purpose of the DEIS because in the words of CEQ, "the EIS is the most comprehensive environmental document, it is an ideal vehicle in which to lay out not only the full range of environmental impacts but also the full spectrum of appropriate mitigation".
Disposition: Other (SEE RESPONSE)

Response

The DEIS does disclose the environmental impacts associated with the Proposed Action and it does propose associated mitigation where appropriate. The DEIS discloses potential impacts to public utilities and services under Section 3.17.3.3.4 (DEIS pages 3-514 through 3-523) and adequately characterizes the scope of socioeconomic impacts as related to public utilities and services. In addition, a new Section 3.26 has been added to the EIS that outlines mitigation measures, such as those for socioeconomics, that are outside of BLM's jurisdiction to implement.

Letter 803, Comment 338

3.17.3.3.5 Page 3-524: The DEIS states that no property tax forecasts have been made past the first 10 years of operations. EML has given presentations to both the county and the school board that forecast beyond this timeframe. The EIS should have taken advantage of that material.
Disposition: Other (SEE RESPONSE)

Response

As stated in the Operations Population Sensitivity Analysis in section 3.17.3.3.2, "Table 3.17-23 summarizes the results of the sensitivity analysis during the first ten years of operations, a period when the mine would achieve and maintain full production, creating long-term job opportunities conducive to household relocation, and to the creation of indirect and induced jobs in the community." This time frame for analysis is applied throughout the EIS to avoid any confusion associated with inconsistent analysis periods.

Letter 803, Comment 339

3.17.3.3.5 Page 3-524: The DEIS does a good job of delineating how the net proceeds are currently divided between the local school, county, and state governmental entities. However, there should be a qualifying statement to acknowledge the uncertainty of future local government net proceeds revenue due to potential likely changes in state statutes.
Disposition: Other (SEE RESPONSE)

Response

This EIS does not analyze hypothetical future situations as identified in this comment.

Letter 803, Comment 340

3.17.3.3.5 Page 3-525: The last paragraph of page 3-525 is confusing. It first mentions $22.1 million of LSST then $11.1 million of LSST for ECSD. If $11 million of LSST is part of the state's total of $30.7 million, it should be better explained. If not, it would appear that there is some discrepancy.
Disposition: Other (SEE RESPONSE)

Response

The $11.1 million accruing to the ECSD is not part of the state's total of $30.7 million, but rather represents 50% of the total LSST. The text in the last paragraph of the Sales and Use Taxes discussion in section 3.17.3.3.5 has been changed to read as follows: "Total sales and use tax revenues during construction and through year 10 of operations are projected at $63.9 million. The total includes $22.1 million in LSST, $4.9 million in BCCRT, $17.2 million in SCCRT, and $19.7 million in state sales tax. Of the total, Eureka County is projected to realize $22.1 million in BCCRT and SCCRT, and an estimated $11.1 million in LSST revenue (50% of the total) would accrue to the ECSD. The State of Nevada would realize $30.7 million in LSST and state sales and use tax revenue."

Letter 803, Comment 341

3.17.3.3-5 Page 3-527: The analysis misses an important element about the fiscal impacts. Eureka County has made significant expenditures to date and will have to make even greater ones before any tax revenue is generated by the Mt. Hope Project. These expenditures primarily benefit the Mt. Hope population and maintain the safety, health and well-being, and quality of life for both the construction and operations phase workers and their families. Placing a local government in this position without some guarantee to cover expenditures is certainly a significant adverse impact which warrants serious consideration of appropriate mitigation measures. Dismissing these adverse impacts because the future positive benefits of the project might outweigh the negative one brings little relief for the risks being incurred early in the project development by Eureka County.
Disposition: Not within agency's jurisdiction (SEE RESPONSE)

Response

The Significance of the Impact section under Impact 3.17.3.3-4 states, "This impact is considered significant and has both beneficial and potentially adverse impacts. No mitigation measures are proposed. Nevertheless, it is suggested that EML and Eureka County build on previous and current planning efforts to address public infrastructure and service issues."

The Significance of the Impact section under Impact 3.17.3.3-5 states, "This impact is considered significant; however, no mitigation measures are proposed. While the long-term tax revenues would likely provide for increased infrastructure expenditures, it is suggested that EML and Eureka County build on previous and current planning efforts in order to prepare for the possible timing differences between expenditures and tax revenues."

The BLM believes that these statements provide an accurate and balanced description of the impacts and recommends that EML and Eureka County work together to develop mitigation for the potential adverse impacts as it is outside of the BLM's jurisdiction to require. This recommendation is consistent with the BLM's authority related to mitigation of socioeconomic impacts. The BLM does not have the authority or control of future economic conditions and other contributing factors to "guarantee" that public expenditures will be covered by future tax revenues. The BLM appreciates the efforts and resources Eureka County has already committed in preparation of this potential project. The BLM continues to strongly encourage EML and Eureka County to work together, in good faith, to develop mutually agreed upon planning options.

Letter 803, Comment 342

3.17.3.3.6 Page 3-529: The first paragraph of this page states that "the social effects of the project would likely result from the introduction of a large number of newcomers rather than the fact that the project involves mining." This statement is not entirely accurate. In recent years, southern Eureka County has enjoyed a very mixed balance of demographic components including miners, farmers, ranchers, government workers, small business owners, and retirees. When the mine comes into operation, the demography and the culture of the community will be primarily mine related which in itself could bring about some change.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text on DEIS page 3-529 has been revised to read as follows: "...the social effects of the Project would likely result primarily from the introduction of a large number of newcomers into a small, relatively stable rural community, although the fact that the Project involves mining may also play a role."

Letter 803, Comment 343

3.17.3.3.6 Page 3-529: The third paragraph mentions possible increases in traffic, crime, and drug or alcohol use but there is no discussion of small communities that have had similar growth-related experiences. Such data would be helpful in estimating impacts in Eureka County.
Disposition: Other (SEE RESPONSE)

Response

The best available data were used. There is not sufficient data to quantify these impacts and any such analysis would be speculative.

Letter 803, Comment 344

3.17.3.3.6 Page 3-530: The summary paragraph should note that many local residents and Eureka County remain concerned about the commitment and effectiveness of the mitigation measures proposed to date.

Disposition: Analysis modified (SEE RESPONSE)

Response

This comment is not supported by data. The commenter is referred to the Mount Hope Mine Community Opinion Survey (May 2010) which describes the public support for the Project. Reference to this survey has been added to Section 3.17.2.2.6 of the EIS.

Letter 803, Comment 345

3.17.3.7 Page 3-535 and Page 3-536: A smaller longer socioeconomic impact is the dominant rationale for the slower longer alternative and should have been addressed more thoroughly, including having numeric estimates. Without numeric estimates this alternative cannot be reasonably analyzed.
Disposition: Other (SEE RESPONSE)

Response

The Proposed Action was designed and engineered for an economically viable project. The mining rate for the Proposed Action is a result of mine engineering and optimization studies. Simply plugging in different employment and project duration estimates for the Slower, Longer Alternative analysis would not result in a valid assessment of socioeconomic impacts, particularly if those estimates were not supported by engineering. For example, without a redesign of the Project, projected revenues and expenditures could not be accurately predicted. Net Proceeds of Mines (NPM) taxes derive from a mine's gross revenue minus the cost of production. For the Proposed Action, these values were calculated based on the Project design, including capital costs and operating expenses. To determine the NPM taxes for the Slower, Longer Project Alternative would require a redesign of the Project, because at a lower mining rate, a financially viable project might only be possible by mining a smaller resource. These complexities would extend to quantification of other impacts (indirect and induced employment, total population impacts, school age children, housing demand, sales and use tax, property tax revenues, etc.). Without realistic, engineering-based inputs, the models would not produce reliable numeric estimates of socioeconomic effects and since this alternative is not economically viable these values have not been calculated. Therefore, a qualitative assessment would be the most reasonable approach for this alternative.

Letter 803, Comment 346

3.19.2.2 Page 3-545: There is inconsistency with the numbers provided here when compared to the transportation section on p. 3-644. On p. 3-644 the text describes the average as being 740 daily trips where here the average is reported as being much lower at 601. Please make sure numbers and data sources match.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 803, Comment 347

Further, analysis must be revised to account for the most recent data on traffic counts. There is much more car and truck traffic on the road system today than there was just a couple of years ago due to the large amount of exploration and development activity taking place in the area. Use the most recent data available in order to have an adequate description of current existing conditions (the baseline).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 803, Comment 348

3.19.3.3.1 Page 3-546: Text and Table 3.19-1 speak of ANFO being transported, delivered, and stored. However, ammonium nitrate (AN) and fuel oil (FO) are transported and stored separately. There should be revision to the text and table to make this clear that the separate constituents of ANFO are kept separated until used for blasting.
Disposition: Analysis modified (SEE RESPONSE)

Response

The acronym "ANFO" in the third paragraph in Section 3.19.3.3 has been changed to "ammonium nitrate, fuel oil,". The acronym "ANFO" in the first paragraph in Section 3.19.3.3.1 has been changed to "Explosives". The acronym "ANFO" in Table 3.19-1 has been changed to "Ammonium Nitrate".

Letter 803, Comment 349

3.19.3.3.1 Page 3-546: Exacerbating the risk of low probability/high impact events as well as "ordinary" severe motor vehicle accidents are: the design and maintenance of SR 278 including lane width and the lack of shoulders, increased bus and heavy truck traffic with an increase of 5004 hazardous material trips per year (about 13 per day) on SR 278 mixed in with other motor vehicles, increased fatigue of drivers, particularly on "end of shift" days and low state law enforcement priority resulting in an increase in risky

driving behavior. Eureka County EMS will have to expand, train and equip for an increase in motor vehicle accidents and an increased probability of a low probability/high impact event.
Disposition: Other (SEE RESPONSE)

Response

An increase in EMS and other county services is covered under Section 3.17 - Socioeconomics of the EIS. In addition, a new Section 3.26 has been added to the EIS that outlines mitigation measures, such as those for socioeconomics, that are outside of BLM's jurisdiction to implement.

Letter 803, Comment 350

3.19.3.3.3 Page 3-549: Eureka County emergency services (including Sheriff's Dept.) would likely be called in on any release of hazardous material especially spills on highways and County roads. Mitigation Measure 3.19.3.3-1 must speak to more than just "maintaining…Emergency Response Plan" and include close coordination and communication with local emergency services and law enforcement to ensure efficient, controlled, and timely coordinated response to spills.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-069-Mitigation for Impacts to Highways

Letter 803, Comment 351

3.20.2.3 Page 3-554: BLM's response to previous ADEIS comments regarding the same was that the text would be updated to account for most recent data. Please use more recent numbers than the Pony Express Trail re-ride from 2006. Five re-rides have taken place since 2006. Further, there must be a citation for the origin of the numbers.
Disposition: Analysis modified (SEE RESPONSE)

Response

The following text has been deleted "Also in 2006 there were a total of 230 individuals that used the segment of the trail within the Project Area. For the Nevada portion of the re-ride there were 215 participants." The text in the FEIS has been revised to read, "In 2010 there were a total of 215 individuals that used the segment of the trail within the Project Area (personal communication, Gary Nezo, current National Pony Express Association, Nevada branch president)."

Letter 803, Comment 352

3.20.3.1 Page 3-554: The significance criteria references "Class II VRM objective" yet in the visual resources section on p. 3-301 it states that "The Mount Hope area was inventoried by the BLM for the Shoshone-Eureka Resource Management Plan as a combination of Visual Management Class III and IV areas (BLM 1986a). The BLM has mapped both Class III and Class IV at Mount Hope and the surrounding area." There is something inconsistent here. Is the VRM objective adjacent to the Pony Express Trail in Class II? If so, the Visual Resources section should be revised to make this clear because there is no description of any Class II areas. Further, regardless of the Class, the visual resources section should be augmented with language about the Pony Express Trail and then references made to this section (3.20) for the specific analysis.
Disposition: Comment acknowledged; does not provide new information

Response

The Pony Express NHT is not within a VRM Class II area. However, BLM IM NV-2004-004 states that "the Class II VRM objective shall be the standard for findings of no adverse effect unless the site or segment in question is in an area having a more stringent (i.e., Class I) VRM objective for any reason. Visual mitigation is included in Mitigation Measure 3.7.3.3-1."

Letter 803, Comment 353

3.20.3.3.1 Page 3-557: We agree that for Impact 3.20.3.3-1 (and partially for 3.20.3.3-2) that there is limited, if any, mitigation that can be identified on-site to address the significant impacts to the Pony Express Trail. However, BLM has the authority and responsibility to call for mitigation to address the impact, even if through less-than-preferable off-site mitigation. We request that BLM develop mitigation measures to indirectly address the impacts to the Pony Express Trail. Examples could include augmentation/improvement of access points (i.e., parking areas) to the Trail, repair or replacement of existing Trail signage, or placing of new informational kiosks or signage, etc. to partially address the impact.
Disposition: Other (SEE RESPONSE)

Response

CC-055-Mitigaition for Visual Impacts to Historic Trials

Letter 803, Comment 354

3.21 Page 3-561: The DEIS fails to addresses the potential indirect impacts to the historic and cultural resources of the Town of Eureka including potential impacts to existing historic structures through increase usage, vandalism, etc.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-043- Indirect Cultural Resource Impacts

Letter 803, Comment 355

Also, the development that will take place in Eureka directly attributable to the Mt. Hope Project may have impacts to the historic downtown of Eureka including artifacts and sites that are known to exist and may be excavated during development activities. Please include analysis, discussion, and framing of mitigation to address these potential impacts (which seem to belong under Cultural Resources, 3.21).
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-043- Indirect Cultural Resource Impacts

Letter 803, Comment 356

3.21.3.3-1 Page 3-568: As part of the mitigation to protect cultural resources, BLM should require EML to provide employees and subcontractor employees for construction and operations with a BLM brochure concerning the prohibitions and penalties for collecting or desecrating cultural resources. With the influx of workers, it is important for BLM and the mine to work together proactively to educate workers in order to protect these irreplaceable resources.
Disposition: Comment acknowledged; does not provide new information

Response

The operational performance standards in the FEIS have been revised to include cultural sensitivity training for project employees.

Letter 803, Comment 357

3.21.3.3 Page 3-568: Again, reliance on a future plan does not allow the BLM, Eureka County, or the public to weigh the effectiveness of Mitigation Measure 3.21.3.3-1. All mitigation of every impacted resource, including eligible cultural sites, must be described in sufficient detail to help measure the impacts and make a reasoned choice on an alternative. Please ensure that the document is revised to frame the treatment plan (mitigation) in the document now and not wait until some undefined future date.
Disposition: Other (SEE RESPONSE)

Response

The locations of cultural resources are proprietary information and, therefore, are not disclosed in the FEIS. Additionally, the treatment plan is administered under Section 106 which is a separate, but often parallel, process from NEPA.

Letter 803, Comment 358

3.23.1 Page 3-592: Please include the language from the County's Master Plan regarding the policies for wildlife and fisheries (Master Plan 6.2.4). Some of the specific language that is applicable includes: "GOAL: Maintain, improve or mitigate wildlife impacts to habitat in order to sustain viable and harvestable populations of big game and upland game species as well as wetland/riparian habitat for waterfowl, fur bearers and a diversity of other game and non-game species. OBJECTIVES: 1) Coordinate with the Eureka County Wildlife Advisory Board, Eureka County Natural Resources Advisory Commission, Nevada Department of Wildlife, affected private property interests, lessees and permittees to develop...guidelines for future site specific management plans affecting upland, water fowl and big game habitat; 2) Community economic concerns and values will be obtained from the Eureka County Wildlife Advisory Board, Eureka County Natural Resources Advisory Commission, Eureka County Economic Development Board and the Board of Eureka County Commissioners; the voice of Eureka County citizens provides the basis for wildlife and wildlife habitat management...; 3) ...where necessary mitigate, harmful impacts to rangelands, woodlands, native wildlife species...Mitigation must accommodate impacts that have accumulated since initial resource allocation.; 4) Manage wildlife populations and wildlife habitat to enhance species native to Eureka County habitats. Exceptions to this objective must be founded on a clear public benefit attributed to the introduction, enhancement or propagation of a non-native species or a species native to Nevada, but not historically found in Eureka County. Public benefit is demonstrated through affirmation by the Eureka County Wildlife Advisory Board and Eureka County Natural Resources Advisory Commission.; 5) Conduct rangeland studies, pellet group plots, breeding bird transects and other appropriate studies to monitor wildlife relationships to available habitat as well as impacts of vegetation manipulation projects on wildlife; 7) Accelerate the planning, approval and completion of multiple-use water developments, rangeland treatment projects and prescribed burns that include objectives for enhancement of big game and other wildlife habitat. Wildlife developments must be cooperative in nature, respecting the rights and interests of existing resource users; 8) Include considerations of wildlife habitat requirements in the design and reclamation of mineral development projects through approved Plan(s) of Operations.; 9) Assure that management agencies provide all necessary maintenance of enclosure fences not specifically placed for improved management of livestock."
Disposition: Analysis modified (SEE RESPONSE)

Response
While the county has adopted policies regarding wildlife resources, it does not have the same regulatory authority as the state and federal agencies referenced in this section. No change has been made to the FEIS in response to this comment.

Letter 803, Comment 359

In addition to outlining the language above in the Regulatory Framework, the impacts analyses including framed mitigation must be done in a way to reach consistency with these policies to the maximum extent possible.
Disposition: Analysis modified (SEE RESPONSE)

Response
An appendix has been included in the FEIS to address the inconsistencies with the Eureka County Master Plan. A sentence has been added to the end of the first paragraph in Section 1.5.4 that identifies this appendix.

Letter 803, Comment 360

3.23.1 Page 3-592: Under Regulatory Framework, the document should be revised to describe and discuss the recent interim guidance on greater sage grouse and then carry this language (including management stipulations outlined in the guidance) through the analysis regarding sage grouse.
Disposition: Analysis modified (SEE RESPONSE)

Response
Section 3.23.2.2.2 of the FEIS has been revised to incorporate guidance from the two BLM Instruction Memoranda released in December 2011 regarding greater sage-grouse.

Letter 803, Comment 361

3.23.2.2.1 Page 3-600: We thank BLM for finally recognizing the importance of Roberts Creek as a treasured local fishery. However, we still have some outstanding concerns related to analysis and framing of mitigation. Please take all of our comments that we made regarding Roberts Creek under the water related and recreation section of the DEIS and apply them here along with requested changes. Those previous comments have direct application to the way this fishery is analyzed here in this section.
Disposition: Other (SEE RESPONSE)

Response
The commentor is directed to Section 3.2.3.3 of the FEIS for mitigation for flows in Roberts Creek. The FEIS has been revised to make clear that mitigation may be required for Project-caused reductions, rather than "cessation" of flows. Enhancement or replacement of surface flows with ground water is one of the potential mitigation options, should impacts occur, as described in the EIS. The BLM may select other options from that list or identify other effective mitigation options, should impacts occur or be deemed imminent.

Letter 803, Comment 362

3.23.2.2.3 Page 3-612: Our understanding is that LCT have also been found in Willow Creek. In fact, we first learned about this on a Mt. Hope Project EIS phone conference. Yet, there are no changes to the DEIS to speak about Willow Creek in the text or to depict the portions of this stream that bears LCT. Please make changes accordingly to text, figures, and analysis.
Disposition: Other (SEE RESPONSE)

Response
Willow Creek is located outside of the predicted ten-foot drawdown associated with the Project. The EIS states on under the Status within the Pine Creek Subbasin discussion in section 3.23.2.2.3, "In the summer of 2011, the NDOW located a population of LCT in Willow Creek which is located east of Birch Creek and northeast of the Project Area (Personal Communication, Ryan Sandefur, September 23, 2011)."

Letter 803, Comment 363

3.23.2.2.3 Page 3-616: Why was PFC data from 2001 used instead of more recent PFC data available through BLM (completed by Bob Hassmiller)? Please revise and use the most recent data available to describe existing conditions.
Disposition: Comment acknowledged; does not provide new information

Response
The BLM used the best available data for assessing Project-related impacts associated with the predicted ten-foot ground water drawdown. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 364

3.23.2.2.3 Page 3-617: Please check Table 3.23-4 for errors. At least two of the columns, "PFC" and "FAR-UP" do not sum correctly in the column total.

Disposition: Factual correction made (SEE RESPONSE)

Response

The total value in the "PFC" and "FAR-UP" columns in Table 3.23-4 have been corrected to read "5.28" and "1.56", respectively.

Letter 803, Comment 365

3.23.2.2.4 Page 3-621: Please cite references regarding climate change discussion
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-042-Climate Change

Letter 803, Comment 366

3.23.3.3.1 Page 3-622: Despite our previous ADEIS comments in which BLM responded that "Text will be revised in next version of document" no changes were made. We again request that there is specific reference to fish in addition to general wildlife. The title of this section of the DEIS itself separates wildlife and fish.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 803, Comment 367

Still, none of the other streams that contain fish other than LCT (whether they are rainbow trout or brook trout) are even mentioned in any of the significance criteria or mitigation analyses. Fish treatment, especially on Roberts Creek, needs to be consistent with the other wildlife or any other of the mitigation proposals for the impacted resource.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 803, Comment 368

We propose a significance criterion to read, "Result in a reduction of flow or change in water quality in Roberts Creek or other recreational fishery that reduces the viability and sustainability of the recreational fishery as it exists before Project activities."
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 803, Comment 369

Then, frame an impact "There may be a decrease in flows or change in water quality which affects the creeks' viability and sustainability as a recreational fishery."
Disposition: Analysis modified (SEE RESPONSE)

Response

The water mitigation trigger has been revised to address impacts regarding a reduction in flow that is attributable to the Project; therefore, no change has been made in the FEIS in response to this comment.

Letter 803, Comment 370

Finally, move forward with framing mitigation using much of the mitigation from Section 3.2.3 and including our comments and requests related to the same in addition to what we provided regarding the recreation section.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 803, Comment 371

3.23.3.3 Page 3-622: We appreciate that BLM, in the wildlife section, has outlined mitigation for many impacts that were not considered significant (i.e., pygmy rabbits and bats). We ask that BLM be consistent on this approach across all resources and impacts analyzed to reduce impacts to any resource through mitigation, even when not significant.
Disposition: Comment acknowledged; does not provide new information

Response
CC-134- NEPA Significance Threshold and Mitigation

Letter 803, Comment 372

3.23.3.3.1 Page 6-624: Many of the same comments that we made on previous sections (especially mitigation) related to water quality, recreation, special status species, wild horses also apply here as many of these sections are referenced in the DEIS as being the measures employed to analyze impacts and frame mitigation. Please reference our previous comments for application here and revise accordingly.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 803, Comment 373

3.23.3.3.2 Page 3-629: Pygmy rabbits construct their burrows in loose and sandy soils and burrows are often constructed in areas disturbed by human activity due to the "easy digging" of previously disturbed soils (note that on Figure 3.23.3 that the only locations where pygmy rabbits were observed are in locations near human disturbance). The mitigation measure of a funding source for sagebrush habitat improvement projects will not ensure that pygmy rabbits are benefited or that impacts to pygmy rabbits are mitigated. Please revise Mitigation Measure 3.23.3.3-9 to now read, "...an interest bearing account would be created specifically for use on future sagebrush habitat projects that would directly benefit pygmy rabbits through targeting of specific areas containing soils where pygmy rabbits are or would likely establish burrows..."
Disposition: Analysis modified (SEE RESPONSE)

Response
The text in the FEIS has been revised to read, "EML would fund future sagebrush habitat improvement projects in the area that would directly benefit pygmy rabbits. Based on a ratio of two acres per every acre disturbed, EML would provide 950 acres of habitat improvement projects. Projects would be selected by the Wildlife Working Group which would review greater sage-grouse habitat projects (described in Appendix D, Attachment 3). Projects that benefit both greater sage-grouse and pygmy rabbits could count toward both acreage requirements as approved by the Wildlife Working Group."

Letter 803, Comment 374

3.23.3.3.2 Page 3-630: DEIS reads that "The mitigation measures identified in Section 3.2.3 to ensure that the development of the ten-foot drawdown contour is consistent with the analysis in this EIS (Mitigation Measures 3.2.3.3-2a and 3.2.3.3-2b)..." This statement is incorrect. Neither Mitigation Measure 3.2.3.3-2a nor 3.2.3.3-2b carries any requirement to "ensure that the development of the ten-foot drawdown contour is consistent with the analysis in this EIS." If BLM wishes to keep this language in, then we expect the ROD to explicitly outline the restriction that the real drawdown associated with Project pumping does not vary from what is currently predicted in the EIS.
Disposition: Analysis modified (SEE RESPONSE)

Response
The last sentence in paragraph under the Yellow-billed Cuckoo and Springsnails in the FEIS has been revised to read, "Mitigation for impacts to surface water resources are outlined in Section 3.2.3."

Letter 803, Comment 375

3.24 Page 3-643: The DEIS provides an inadequate analysis of the impacts of project related transportation on State Route 278 (SR 278). The DEIS improperly concludes that the impacts of increased traffic on SR 278 are not considered significant.
Disposition: Other (SEE RESPONSE)

Response
The comment does not provide any specifics; therefore, the BLM cannot provide a detailed response. As outlined in the response to comment #346 from letter #803, the baseline traffic data has been updated and the subsequent analysis reflects these updated data in the FEIS.

Letter 803, Comment 376

The Affected Environment section (3.24.2) fails to report the existing conditions on SR 278,
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 803, Comment 377

and the Environmental Consequences section (3.24.3) omits any discussion of the impacts of increases in truck, bus and passenger vehicle traffic on SR 278.
Disposition: Comment acknowledged; does not provide new information

Response

CC-049- Traffic Impacts on SR 278

Letter 803, Comment 378

3.24.2.2 Page 3-644: The Existing Conditions section describes the roads and their use, but fails to address the condition of the roads. SR 278 has no shoulders, is prone to flooding, has slow moving agricultural vehicles, and the school buses stop directly on the road. Snow removal from Alpha to Carlin is less certain than from Alpha to Highway 50. The presence of active agriculture transportation in Pine Valley is not adequately addressed in the DEIS. Slow moving hay delivery systems and tractors are part of daily life on SR 278 in Pine Valley. There are no shoulders in this area either, making it difficult for slow moving vehicles to pull over and providing little maneuverability for fast moving trucks and buses. See attached letter to NDOT from Eureka County Commission dated 4/21/08 describing conditions on SR 278 and NDOT response letter dated 6/3/08. Since that time, the County has observed increased accidents on SR 278 due to increased traffic from mining projects in the region, and SR 278 is already in a state of significant disrepair in some sections, largely as a result of heavy truck traffic. The most current NDOT data on average daily traffic volume for trucks is now four years old. Given the escalation of mining activity in the region since 2008, we believe that the baseline data provided is outdated and does not reflect current truck traffic volume.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 803, Comment 379

3.24.3.1 Page 3-644: For transportation, the environmental consequence significance criteria consider only a "substantial" increase in traffic load "in relation to the existing traffic load" and the capacity of the road system. The significance criteria ignore the condition of the road system and safety factors.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 803, Comment 380

3.24.3.3 Page 3-645: Last sentence refers to deliveries of hazardous chemicals discussed in Section 3.20 but that discussion is actually in Section 3.19.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text has been revised from "Section 3.20" to "Section 3.19".

Letter 803, Comment 381

3.24.3.3 Page 3-645: The Proposed Action project description states that "through the use of buses to transport workers from the communities in the area, traffic pressure on SR 278 would be minimized." However, this portion of the DEIS lacks an estimate of the number of bus trips. Section 2.1.13, page 2-65 indicates a peak of 5 round trips to Elko per day and three to Eureka per day for the life of the mine. If these estimates are accurate and valid, they should be used in the transportation section to disclose the number of buses and calculate the percentage increase from the 2008 NDOT statistics cited in the DEIS which show no (zero) bus trips in 2008. On a percentage basis, the increase would be "substantial in relation to the existing traffic load." Similarly, the section states, "there would be an undetermined increase in passenger vehicle trips per day on SR 278." However, there is no numerical estimate or range provided. We believe that the project proponent should be able to provide an estimate in the form of a range which would enable the BLM to consider whether or not the project would generate a "substantial increase in traffic load" for passenger vehicle trips.
Disposition: Comment acknowledged; does not provide new information

Response

CC-049- Traffic Impacts on SR 278

Letter 803, Comment 382

3.24.3.3-1 Page 3-645: The DEIS estimates a 15 percent increase in truck traffic, an unspecified increase in passenger car traffic on SR 278, no mention of bus transport, and concludes that the impact is not significant and that no mitigation is proposed. We know from section 3.19.2.2 page 3-545 that SR 278 currently experiences 22 daily trips by trucks. Section 2.1.11.1 states that the truck trips

just to deliver chemicals will be approximately 19 per day. That results in an approximately 85 percent increase rather than the 15 percent increase asserted in 3.24.3.3-1. Based on the stated significance criteria, we believe that the transportation impacts are significant and that the analysis that concludes otherwise is deficient and should be corrected. With the knowledge of the activity to be generated during construction and operations from employment and mine-related activity, we suggest that Impact 3.24.3.3-1 read: "For the life of the project, which could be up to 70 years, there would be an increase in truck (approximately 85 percent), passenger car (about __ to ___ percent) and bus (approximately __ percent) traffic on SR 278 and U.S. Highway 50." If the numbers are obtained and expressed as shown above, the analysis will show that the impact of the Proposed Action on increasing traffic on existing roadways is considered significant, and committed mitigation is required.
Disposition: Analysis modified (SEE RESPONSE)

Response

The analysis under the Hazardous Material and Transportation sections has been revised to use the most current traffic data.

Letter 803, Comment 383

Safety issues along SR 278 must be addressed through a committed mitigation plan in the DEIS, rather than ignoring the hazards and deferring action and commitment. Potential mitigation measures could include but are not limited to pull out areas, constructed turnouts at each bus stop so that the bus pulls off the main road to pick up children, additional warning signage for bus stops, reduction of speed limit in Pine Valley, improved signage to warn drivers of the Pine Valley hazards, coordination with NDOT to improve snow removal from Alpha to Carlin, and the installation of shoulders to improve safety and safe passage. Eureka County's EMS Coordinator recommends a dedicated passing lane in Pine Valley, in the vicinity of Pappy's, on the uphill lanes of Garden Pass (both North beginning at the Dome House and south beginning at Saddler Brown) and at least on passing lane in Diamond Valley to reduce the risk of high speed head-on collisions.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 803, Comment 384

3.24.3.3 Page 3-645: Our previous ADEIS comments were not fully addressed and there is incomplete and inadequate discussion regarding Project transportation related impacts especially in relation to State Route 278. Although buses may reduce the amount of tires traveling the road, the weights of the vehicles will actually cause more problems. Further, there are no efforts to try to quantify (or EML commit) to restrictions on employees from bringing personal vehicles to work or in which direction the buses will be traveling from. There needs to be efforts taken to quantify how many buses, how many personal vehicles, how many contract light-duty trucks, etc. Eureka County emergency and law enforcement services as well as residents in Diamond Valley and Pine Valley are especially interested to have this number pinned down so they can be informed on what to expect.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 803, Comment 385

Also, there is no analysis and discussion on the heavy equipment and construction traffic during the long construction phase that will last almost 2 years.
Disposition: Analysis modified (SEE RESPONSE)

Response

The analysis in Section 3.24.3.3 has been revised to include a section on construction-related traffic.

Letter 803, Comment 386

Additionally, where is the increased traffic going to come from for toll roasting deliveries both in and out? This is not even discussed. Please revise and include more detail on these impacts.
Disposition: Comment acknowledged; does not provide new information

Response

CC-049- Traffic impacts on SR 278

Letter 803, Comment 387

3.24.3.3 Page 3-645: There is failure to acknowledge and analyze the increase of Project traffic on County gravel roads that access components of the Project other than just the mine. What about the traffic load on Roberts Creek Road, Gold Bar Road, and the Henderson Summit Road to access wellfield components for servicing and maintenance? Please include these impacts.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-019-Roads and Traffic

Letter 803, Comment 388

3.24.3.3 Page 3-645: The significance criteria references "substantial" increases "in relation to existing traffic load and capacity of the roadway system" but there is no analysis or description of what is considered "substantial" or "significant". Simply making a statement that "Overall, the impact...is not considered significant" is indefensible because there was nothing done in the analysis to quantify these impacts. Please revise the impacts analysis accordingly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-049- Traffic impacts on SR 278

Letter 803, Comment 389

We request that Impact 3.24.3.3-1 be revised to give more weight to, and take into account, increases and strains on County roads as previously requested.
Disposition: Analysis modified (SEE RESPONSE)

Response
The impact has been revised to incorporate a more comprehensive discussion of the range and type of impacts to SR 278 and U.S. Highway 50.

Letter 803, Comment 390

Then, revise Significance of Impact 3.24.3.3-1 to read "While the impact could be considered significant, it is not expected to be. However, the following mitigation measure would be implemented."
Disposition: Comment acknowledged; does not provide new information

Response
The condition and maintenance of SR 278 and U.S. Highway 50 are under the jurisdiction of NDOT. The BLM has no jurisdiction or authority to require or implement mitigation on either of these roads. See the response to Comment 389 of Comment Letter 803 regarding a discussion of the potential impacts to SR 278 and U.S. Highway 50.

Letter 803, Comment 391

Finally, outline mitigation measures to read, "EML would ensure that every effort be taken to bus the majority of employees to and from the Project site. EML will also provide policy to mine employees that cannot ride buses to car pool whenever possible. EML will also limit unnecessary visits to the Project area by vendors, contractors, and mine support services. EML will coordinate with Eureka County and NDOT to address any issues that arise on the transportation system by invitation from any, or all, parties. EML will develop an MOU with Eureka County before mine start-up to establish maintenance responsibilities by EML on County roads heavily used or impacted by Project activities."
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-069-Mitigation for Impacts to Highways

Letter 803, Comment 392

3.24.3.3.1 Page 3-646: The 734 acres of unavoidable loss are utilized by more than just "livestock grazing and mineral exploration." Please revise sentence to read, "The Proposed Action would…utilized for wildlife habitat, wild horse and livestock grazing, dispersed recreation (including hunting), and mineral exploration among other potential uses resulting from..." This change should be made in multiple areas of the document in other resource sections.
Disposition: Analysis modified (SEE RESPONSE)

Response
The residual impacts analysis in Section 3.24.3.3.1, 3.24.3.5.1, 3.24.3.6.1, and 3.24.3.7.1 has been revised to incorporate the reference impacts.

Letter 803, Comment 393

3.24.3.7 Page 3-649: Due to "cut and paste" there are parts of the Slower, Longer Alternative analysis that report the "life of the project" as being exactly the same as the Proposed Action. Please correct.
Disposition: Factual correction made (SEE RESPONSE)

Response
The text has been revised from "70 years" to "114 years".

Letter 803, Comment 394

3.25.2.1 Page 3-650: As we pointed out on the ADEIS, there must be descriptions under Existing Conditions regarding current and ongoing p-j woodland thinning projects taking place near the Project Area. This would include the Roberts Mountain p-j thinning and the Sulphur Springs p-j thinning.
Disposition: Already addressed in planning documents

Response
Pinon-juniper thinning activities occuring near the Project are identified in Section 4.3.3. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 395

There should probably also be discussion on some of the documented diseases currently affecting woodlands within the area such as beetles, pocket rot, rust, mistletoe, and sawfly.
Disposition: Other (SEE RESPONSE)

Response
Current insect and disease levels within or near the Project Area are at endemic levels and no further discussion or analysis is warranted. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 396

3.26 Page 3-657: It is questionable to define short term as the 80+ years of "the life of the Project through closure and reclamation." Further, rather than again reverting to language to only address direct impacts and reclamation of these impacts, please revise the Relationship Between the Local Short-Term Uses of the Human Environment to also include the long-term impacts related to what the DEIS has described as "indirect" including wellfield drawdown effects, pit infilling and lake development effects, social stigma effects, and persisting economic effects (primarily to individual agricultural operations).
Disposition: Analysis modified (SEE RESPONSE)

Response
As described in Chapter 3 of the DEIS, short term is defined as the 44-year operational life of the proposed Project and the 30-year reclamation period and long term is defined as the future following reclamation (i.e., beyond 80 years). This section identifies the tradeoffs between the short-term impacts to environmental resources during the operation and reclamation versus the long-term impacts to resource productivity that would extend beyond the end of reclamation.

The text in Section 3.26 of the FEIS has been revised to read as follows, "Short term is defined as the life of the Project through closure and reclamation. Long term is defined as the future beyond reclamation. The short-term use of resources during the construction, operation, and reclamation of the mine would result in beneficial impacts in the form of additional local employment and the generation of revenue. The proposed project would result in various short-term impacts such as the temporary loss of soil and vegetation productivity and the associated loss of herbaceous habitat, possible wildlife avoidance, a reduction in dispersed recreation opportunities, temporary increases in fugitive dust, social and economic impacts to the local infrastructure, and increased noise levels. These impacts are expected to end upon completion of operations and would be minimized through implementation of EML's operational performance standards and EIS mitigation measures. The short-term visual impacts would last a few years beyond mine closure and would gradually be reduced as vegetation becomes established. The scale and extent of the waste rock dumps and tailings impoundment facilities would continue to alter the local landscape and views in the long term. Impacts to long-term productivity (i.e., following Project reclamation) would primarily depend on the effectiveness of the proposed reclamation of the disturbed areas. Successful reclamation would provide for post-mining wildlife and livestock grazing by establishing self-sustaining plant communities. Revegetation is also expected to stabilize disturbed surfaces and control erosion. There would be long-term loss in soil and vegetation productivity and associated terrestrial wildlife habitat, a reduction in livestock grazing areas, and public lands used for dispersed recreation that would not be reclaimed. In addition, a potential long-term loss of riparian vegetation associated with seeps, springs, and creeks associated with mine dewatering pending recovery of the ground water tables."

Letter 803, Comment 397

4.1 Page 4-1: Most of the comments made throughout the DEIS related to significance criteria, mitigation, resource topic specifics are not repeated under cumulative impacts but do apply. For example, the same issues that exist with regards to the Proposed Action also exist in analyses and descriptions of the cumulative impacts. Please consider these comments as cascading and apply through revisions to cumulative impacts where the same issues exist.
Disposition: Comment acknowledged; does not provide new information

Response
Modifications to the text in Chapter 3 that affect the accuracy of the cumulative impacts analysis have been carried forward to Chapter 4 where appropriate.

Letter 803, Comment 398

4.2 Page 4-2: We have many outstanding concerns with the methodology employed to analyze cumulative effects. Much of this concern is related to the seemingly arbitrary narrow boundaries of many of the CESAs. We made many of these same comments to BLM on the ADEIS. We are confused because in most cases the response by BLM was a perfunctory "Text revised" or "This comment is not consistent with the BLM identified CESA boundary" and then subsequent comments simply stated "See response to comment." Just because our previous comments repeated here were not consistent with the BLM identified CESA boundaries does not translate to the BLM CESA boundaries being reasonable or adequate. We specifically and reasonably justified each request for any CESA boundary and analysis change. We still do not know BLM's justification for not making our requested changes to the various CESA boundaries and analyses and we find that in most cases there are not any changes to the CESAs, analysis, or the descriptions in the text.
Disposition: Other (SEE RESPONSE)

Response
CC-130- Cumulative Effects Analysis

Letter 803, Comment 399

First, the text describes the CESA for surface water and groundwater quality and quantity to be "the three hydrographic sub basins." Which three basins? We commented previously on the ADEIS that the CESA for groundwater and surface water must include the entire Diamond Valley Flow System and Pine Valley as it is recognized that these basins are connected (and the water modeling included these connections).
Disposition: Comment acknowledged; does not provide new information

Response
The CESA includes Pine Valley, Kobeh Valley, and Diamond Valley which are illustrated on Figure 4.2.2 and listed in Table 4.2-1.

Letter 803, Comment 400

Second, the CESA for geology and minerals must be expanded to at least 50 miles to account for the cumulative impacts of Cortez Hills, Horse Canyon (Red Hills), and Gibellini Mine among others not including the ongoing, extensive, and exhaustive exploration going on within the 50 mile radius.
Disposition: Comment acknowledged; does not provide new information

Response
See response to comment 398.

Letter 803, Comment 401

Third, the CESA for air quality should include the air basins affected by predominant wind in addition to the three basins where the Project is located. From a technical basis and relying on predominant wind directions, adjacent basins to the south, southwest, north, and northwest must be included.
Disposition: Other (SEE RESPONSE)

Response
CC-130- Cumulative Effects Analysis

Letter 803, Comment 402

Fourth, the local watershed CESA which is used for soils, vegetation, weed, wetland, and riparian zones excludes the areas known to be connected to the regional flow system and areas that fall within the predicted maximum groundwater drawdown. This is not justified nor does it make sense.
Disposition: Other (SEE RESPONSE)

Response
CC-130- Cumulative Effects Analysis

Letter 803, Comment 403

Fifth, the wildlife and fisheries CESA of the four hunt units adjacent to the Project Boundary fails to take into account natural wildlife migration patterns (including sage grouse movements within the area documented by the Falcon-Gondor study). Wildlife and fisheries has an overlap with recreation and the CESA should be encompassing enough to look at increased hunting, fishing, shed antler hunting, OHV use, etc. on the habits, behavior, and movements of wildlife. Narrowing the CESA to the 4 hunt units does not take into

account migration corridors and these other impacts (sporting) created by an increase in population. We are even more confused why the CESA for wildlife was set as stated on p. 4-2 "since any potential effect to wildlife from the Project would be to wildlife that utilizes the four hunt units." This is confusing because the cumulative effects analysis is supposed to focus on other actives in addition to the Project. Setting the CESA according to Project effects is inadequate.
Disposition: Analysis modified (SEE RESPONSE)

Response

The CESA for Wildlife and Fisheries has been developed by the BLM in coordination with NDOW. Issues related to increased hunting pressure as a result of higher human populations are controlled by NDOW via hunting and fishing permits. The text in Section 4.2 of the FEIS has been revised to read as follows, "...since the majority of the effects from the Project would occur to wildlife habitat within the four hunt units."

Letter 803, Comment 404

Sixth, although the text on p. 4-7 describes the CESA for livestock grazing and production being determined as the grazing allotments that the Project is located within, as well as the allotments in the ten-foot drawdown, at least four allotments meeting this criteria were not included (see Figure 4.2.1). Those allotments missing that receive direct disturbance from the Project include the Ruby Hill Allotment and the Shannon Station Allotment. Those allotments missing that are impacted by the water drawdown contour includes 3 Bars Allotment and Santa Fe/Ferguson Allotment.
Disposition: Analysis modified (SEE RESPONSE)

Response

The CESA for livestock grazing and production has been revised in the FEIS to include all seven allotments.

Letter 803, Comment 405

Seventh, again the CESA for land use focuses too greatly on the Project related effects and doesn't take into account regional or sub-regional effects through a narrow definition of a one-mile buffer around the Project. This is important to us given the potential of growth related to the Project fragmenting the agricultural base of Diamond Valley or bifurcating the current set-up of Eureka. Land use CESA must include Diamond Valley and Eureka. The cumulative impacts for land use should look at impacts to current roads through increased travel especially on Roberts Creek Rd. and Vinini Creek Rd. Further, the CESA must be inclusive enough to analyze the increased impacts to private land that the Project will create. Also, the land use CESA should extend to at least the groundwater drawdown to ensure full disclosure and a meaningful analysis of all cumulatively impacted land uses.
Disposition: Other (SEE RESPONSE)

Response

CC-130- Cumulative Effects Analysis

Letter 803, Comment 406

Eighth, the CESA for auditory and hazardous materials should be expanded to take into account the traffic routes for hazardous materials getting to SR 278 or Hwy 50. Also, sound is going to carry more than 1 mile around the Project and cumulative sound impacts outside of 1 mile of the project need to be known for local residents. Additionally, the cumulative sound impacts to sage grouse on other roads need to be incorporated into the CESA and analyzed. There will be a fair amount of increased usage and sound in Kobeh Valley for wellfield access and increased recreation.
Disposition: Other (SEE RESPONSE)

Response

CC-130- Cumulative Effects Analysis

Letter 803, Comment 407

Ninth, the CESA for socioeconomics must be extended as there are potential projects outside Eureka County which could have cumulative impacts on the Town of Eureka and surrounding areas and should be included in this discussion. The expanded CESA must extend further north to encompass Horse Canyon and its support facilities and 1000 person man camp at the JD Ranch. The socioeconomic CESA must also be extended to account for Midway Gold's Pan Project and Gold Rock Project that will each have roughly 300 jobs and Eureka is the closest community. Further, the socioeconomics CESA must include Crescent Valley because we already experience the fact that increased County revenue causes increased demand for improvements, facilities, and services outside of southern Eureka County.
Disposition: Analysis modified (SEE RESPONSE)

Response

The CESA for socioeconomics in the EIS has been revised to incorporate those activities and projects that have a potential cumulative effect on the socioeconomic conditions in southern Eureka County, including the Ruby Hill, Pan, and Bald Mountain projects. Figure 4.2.2 has been revised to rename the geographic boundary around southern Eureka County the "study area" rather than the "cumulative effects study area", which is consistent with Figure 3.17.1. The text in Table 4.2-1 and in Section 4.2 of the EIS have been

revised to remove reference to the geographic boundary of the CESA. Employment analysis for the Pan and Bald Mountain mining projects have been added to Section 4.4.15 of the EIS.

Letter 803, Comment 408

Tenth, CESA for wild horses must include adjacent areas that aren't HMAs to look at horses moving outside of HMAs (which they already currently do). BLM's response on this previous comment was, "Wild horses are not managed by BLM outside of HMAs." This is of concern because BLM has an obligation to manage wild horses regardless where they are and to keep them within their established HMAs. The HMAs may define the resource adjudicated for wild horses, but as the text in Ch. 3 described, the horses do not stay in their HMAs. This CESA must be expanded to take this into account.
Disposition: Other (SEE RESPONSE)

Response

WHBA requires management of wild horses in HMAs. The BLM does not have documented wild horse use outside of the Wild Horse CESA boundary. There is no evidence of interaction between the Roberts Mountain Complex and other HMAs.

Letter 803, Comment 409

Finally, the CESA for forestry products must be at least the footprint for the 3 Bars Landscape and Ecosystem Restoration Project given the fact that this project will have much connection to p-j woodland cumulative effects. In general almost all of the established CESAs often exclude areas potentially affected by the Project alone under the maximum groundwater drawdown. How can impacts of the Project be quantified or judged if the Project's own impacts aren't even included in the cumulative effects study area? As previously requested, please redefine the CESA to include these connected areas we have highlighted as being part of the CESA and follow through with the analysis to determine the effects.
Disposition: Comment acknowledged; does not provide new information

Response

CESA boundaries for resources are determined individually. The forest products CESA was developed based on existing conditions that support forest products in the area surrounding the Project. Impacts were not identified to Forest Products as a result of the Project since indirect effects from ground water drawdown are not expected to impact pinon-juniper which occur at higher elevations and depend on ephemeral surface water.

Letter 803, Comment 410

4.2 Page 4-10: Public wastewater collection needs to be included in the table. Public services such as ambulance, fire, and police should be included. Housing is another issue which merits inclusion in the cumulative analysis as well as a discussion of other population and employment generating activities for areas near Eureka. Figure 4.2.3 on page 4-13 is not suitable for socioeconomic related resources since such impacts are not linked entirely to groundwater drawdown.
Disposition: Factual correction made (SEE RESPONSE)

Response

Table 4.2-2 in the FEIS has been revised to include "Waste Water" in the "Public Water Facilities" row, and a new row titled "Community Facilities and Services" has been added under the "Utilities and Infrastructure" section. Housing-related issues are captured under the Land Development section of Table 4.2-2. All the activities listed in Table 4.2-2 that have an effect on population and employment are identified with a "13" in the "Anticipated Resources that Could be Cumulatively Impacted" column. The title of Figure 4.2.3 in the FEIS has been revised to read, "Cumulative Projects Data Collection Area (except Native American and Socioeconomics)" to clarify that data collection was not limited to the boundary shown on the figure.

Letter 803, Comment 411

4.2 Page 4-15: We still question the utility of even including Tables 4.2-3 and 4.2-4 since it is still littered with incomplete and questionable data. There are so many non-quantified areas and questionable acreages when reported that the entire cumulative analysis is called into question. First, a RFFA of wildfires of zero acres is not justified. The RFFA acreage for wildfires should at least be the average over the past 10 or 20 years. It is reasonably foreseeable that the long term average would be what is expected. Second, the noxious weed reporting doesn't match as far as past treatments and the total. Also, how can it not be expected that continued weed control will take place as a RFFA? Third, it is very disingenuous to consider that of the dozens of plans of operations that BLM has received for mining and exploration that only 1,113 acres would be considered to be disturbed. At a minimum, the Gibellini Project and the Red Hills/Horse Canyon Project will result in thousands of acres of surface disturbance. Further, it doesn't appear that the expansion of the Ruby Hill Mine was included in the acreage. We know that Ruby Hill has already submitted a Plan Amendment for this expansion.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-063-RFFAs in Tables 4.2-3 and 4.2-4

Letter 803, Comment 412

4.2 Page4-17: The Gibellini Project must be added to Table 4.2-4 as we are aware that they have begun the baseline permitting process with BLM.
Disposition: Other (SEE RESPONSE)

Response

The BLM considers a minerals project as reasonably forseeable when a Plan of Operations is submitted to the agency. The Gibellini project has not submitted a Plan of Operations for development, and is therefore not considered a RFFA in the EIS.

Letter 803, Comment 413

4.3 Page 4-21: Again, in many instances there is usage of outdated data and information. One example of how this greatly influences the baseline is on p. 4-21 where it speaks of current irrigation water rights in Kobeh Valley as being 16,000 afy. What this fails to account for is that 2007 is far from "current" and the 16,000 afy reported does not consider the water that General Moly purchased and transferred from irrigation to mining (which includes the 11,300 afy used in the analyses of the EIS). Second, through the Nevada State Engineer administrative hearings on General Moly's water rights, over 4000 afy was forfeited and taken off the books. Today, only 884 afy is allocated for irrigation in Kobeh Valley. This is a huge discrepancy from what the DEIS reports and analyzes. Much has changed since 2007 when most of the data was pulled. Earlier tables and text in this section talked about data as recently as February 2011. Please revise all baseline information with real, current data to properly establish a baseline in which to adequately compare.
Disposition: Analysis modified (SEE RESPONSE)

Response

Section 4.3 of the FEIS has been revised to include the following text for Kobeh Valley, "Areas under irrigation in Kobeh Valley were approximately 280 acres in 2011 (NDWR 2012). Current water rights have been identified as of June 2012, using NDWR data, at approximately 12,478 acre-feet per year from underground sources. The perennial yield for Kobeh Valley is 16,000 acre-feet per year.", the following text for Pine Valley, "Current water rights have been identified as of June 2012, using NDWR data, as approximately 16,473 acre-feet per year from underground sources. The perennial yield for Pine Valley is 20,000 acre-feet per year.", and the following text for Diamond Valley, "Areas under irrigation in Diamond Valley were approximately 24,357 acres in 2011 (NDWR 2012). Current water rights have been identified as of June 2012, using NDWR data, at approximately 134,240 acre-feet per year from underground sources. The perennial yield is 30,000 acre-feet per year."

Letter 803, Comment 414

4.3.1.1 Page 4-21: The DEIS reports 22,000 acres irrigated in Diamond Valley. However, the on-the-ground cropping inventories of the Nevada State Engineer reports 24,220 acres. Please revise for consistency with the State's numbers.
Disposition: Factual correction made (SEE RESPONSE)

Response

Section 4.3.1.1 in the FEIS has been revised to state "24,357 acres" for areas under irrigation in Diamond Valley based on 2011 data from the Nevada State Engineer.

Comment 415

4.3.1.1 Page 4-21: The broad statement that "the vegetation community" has changes due to livestock grazing is incorrect and misleading. There are many different vegetation communities in the area--not just one vegetation community as the text describes. Although some changes may have occurred in some areas due to legacy grazing, an understanding of current rangeland science, Ecological Site Descriptions, and States and Transitions models shows that most vegetation communities have in reality not changed. It should also be acknowledged that water developments, range improvements, and managed grazing have proven beneficial to wildlife, wild horses, and the local economy.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text in the FEIS has been revised from "vegetation community" to "vegetation communities". The commenter is correct in that range improvements have improved conditions for wildlife, wild horses, and the local economy.

Letter 803, Comment 416

4.3.2.1 Page 4-27: The DEIS currently describes the fact that there are "undocumented daily trips on some county roads that are not represented" however, the DEIS still fails to report the traffic counts, gathered by NDOT and available on their website, on at least Roberts Creek Rd. and County Road 101 (Diamond Valley Rd.). At the very least, it is important to report the traffic on Roberts Creek Road because it is a direct access route to Kobeh Valley, Roberts Mountain, the Project wellfield, and the mine itself. Please include this in the EIS.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-019-Roads and Traffic

Letter 803, Comment 417

4.3.2.1 Page 4-28: Please include that the recent Solar PEIS by BLM targeted specific areas in southern Eureka County as being available for solar energy application and would require transmission of power. Further, Invenergy has met with Eureka County and the Battle Mountain BLM on at least 3 different occasions to discuss their future plans for wind power development in southern Eureka County. This must be also included as a RFFA.
Disposition: Other (SEE RESPONSE)

Response
The BLM considers a project as reasonably forseeable when an application is submitted to the agency. No applications for solar energy projects have been submitted in the CESA; therefore, these projects are not considered RFFAs in the FEIS.

Letter 803, Comment 418

4.3.6.1 Page 4-41: Revise to read, "There are also two cement batch plants, one in the Town of Eureka and one in Diamond Valley approximately 5 miles from the Town."
Disposition: Analysis modified (SEE RESPONSE)

Response
The last sentence in Section 4.3.6.1 has been revised to read "there are also cement batch plants in the Town of Eureka and Diamond Valley."

Letter 803, Comment 419

4.3.6 Page 4-41: This section needs to describe the development of the subdivision near the fairgrounds and the County's expansion of the Eureka Townsite through acquisition of public land.
Disposition: Already addressed in planning documents

Response
The development referenced by the commentor is included in the text under Section 4.3.6.1. In addition, the subdivision is described in detail under Section 3.17.2.2.2 of the EIS. The BLM is not aware of any specific request from Eureka County to expand the townsite at this time.

Letter 803, Comment 420

4.3.7.2 Page 4-43: There is a discrepancy with the acreage reported here for future minerals activities as compared to Table 4.2-3. See our previous comment related to Table 4.2-3. As we previously requested, the acreage for at least the Gibellini Mine, Horse Canyon/Red Hills, and Gold Bar must also be included. Further, update the text with discussions about Ruby Hills proposed expansion in which they have submitted a Plan amendment to BLM.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-063-RFFAs in Tables 4.2-3 and 4.2-4

Letter 803, Comment 421

4.3.5.2 Page 4-38: As we pointed out to BLM on the ADEIS, dispersed recreation is expected to increase due to the increased population and the demographic that would move to the area tend to be more involved in dispersed recreation including hunting, fishing, and camping. Please include text in the RFFA of recreation to acknowledge this.
Disposition: Comment acknowledged; does not provide new information

Response
Dispersed recreation is included in Tables 4.2-2 and 4.2-3 in the FEIS. Section 4.3.5.2 disclosed that recreational use would likely increase proportionally to changes in population.

Letter 803, Comment 422

4.3.7.2 Page 4-43: Despite the promise made by BLM on our previous ADEIS comment that "Comment will be addressed in next version of document" there was no change to address our comment. There are many more than ten loads per day of fuels, cyanide, acid, explosives, and other hazardous materials on SR 278 and Hwy 50 within the CESA--much more. Also, there needs to be discussion on the multiple loads of refractory ore currently (and continuing) being transported from Ruby Hill mine to Goldstrike for roasting.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-068-Traffic Impacts

Letter 803, Comment 423

4.3.8.2 Page 4-44: The last previous ADEIS had language that stated, "The BLM and Eureka County are currently working on plans to expand the landfill." Why was this language taken out? Does BLM not wish to engage with Eureka County on addressing a potential landfill expansion?
Disposition: Other (SEE RESPONSE)

Response
The text was in the DEIS and remains in the FEIS as the last sentence in section 4.3.8.1.

Letter 803, Comment 424

4.3.9.1 Page 4-44: There should be revisions to describe the recent oil well failure at the Pine Valley oil field (Blackburn) and the acreages of contamination and disturbance associated with the clean-up.
Disposition: Analysis modified (SEE RESPONSE)

Response
The second paragraph in Section 4.3.9.1 has been modified to include the following sentence, "An oil spill in the Pine Valley oil field at the Blackburn well resulted in approximately 3.6 acres of surface disturbance associated with the spill (personal communication, Thomas Schmidt, BLM, June 6, 2012)."

Letter 803, Comment 425

4.4 Page 4-47: Based on BLM responses to our previous comments, it is clear that BLM is not going to incorporate any new water related actions into the cumulative modeling segment of the flow model that have come forward since early 2010 (see response by BLM to first ADEIS comment 2164). We still assert that this is arbitrary given the fact that thousands of acre feet of water has been applied for that is not currently taken into account. This is also of concern to us given the notices by Barrick that they are moving forward with Horse Canyon/Red Hills which will be a large dewatering project, the expansion of Ruby Hill Mine for which a plan amendment has been updated and an updated water model developed, and the report by US Gold Corp. of moving forward with the Gold Bar Project. These RFFAs must be accounted for and the analysis revised in order to disclose information "essential to a reasoned choice among alternatives" (CEQ 40 CFR 1502.22). The BLM NEPA Handbook states that at a minimum, "If the information relevant to reasonably foreseeable significant adverse impacts cannot be obtained because the overall costs of obtaining it are exorbitant or the means to obtain it are not known, you must include within the EIS...1. a statement that such information is incomplete or unavailable; 2. a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; 3. a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impacts on the human environment, and 4.the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. For the purposes of this section, "reasonably foreseeable" includes impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason. (40 CFR 1502.22(b))." In all resources analyzed in Cumulative Effects, this supplemental information was never included and we request revisions to meet this requirement if BLM is not going to include the data and information itself.
Disposition: Comment acknowledged; does not provide new information

Response
Past, present, and reasonably foreseeable future mineral development actions are discussed in Section 4.3.7 of the EIS. The BLM has continued to update this information and analysis. Potential impacts to water quantity are discussed in Section 4.4.1 in the EIS. The BLM believes that the information presented in that section is sufficient to identify and explain potential impacts without any revisions to the ground water flow model or to Figure 4.4.1. Minor changes in the model to account for changes in reasonably foreseeable future projects would not make a meaningful change in the model results or the potential impacts. The BLM has also specifically considered the three projects referenced in the comment. Horse Canyon/Red Hills remains an exploration project, no plan of operations has been proposed for the Gold Hill Project, and the expansion of the Ruby Hill Mine will not contribute to cumulative impacts on ground water withdrawal to an extent that additional analysis is required. There is no additional information on this question that is "essential to a reasoned choice among alternatives," and therefore, the discussion of 40 CFR 1502.22(b) is not relevant. No changes to the text of the EIS have been made to address this comment.

Letter 803, Comment 426

4.4 Page 4-47: As we previously commented, there are many mines in the works that are very likely to go into operation and are RFFA. BLM's response that they will not be included because there have not been PoO submissions is not justified because BLM, like us, are aware of these projects moving forward under the State BLM new process of performing all baseline analyses before

submitting the Plan. At the very least, please revise to include Horse Canyon, Gibellini, Ruby Hill expansion, Gold Bar, and Pan Project into all the cumulative analyses including water, minerals, air, etc.
Disposition: Comment acknowledged; does not provide new information

Response
Although there are projects currently conducting baseline studies or exploration activities, they have not presented a proposed action that can be appropriately evaluated. For this reason, only projects that have submitted a plan of operations have been included in the analysis.

Letter 803, Comment 427

4.4.1.1 Page 4-48: The DEIS still fails to acknowledge that pinion-juniper woodland encroachment and expansion outside of proper ecological sites has a direct impact to surface water and groundwater quantity both in the past, the present, and into the future. This is evidenced by recent research in Oregon (Tim Deboodt) and also here in Nevada (Porter Canyon- Dr. Tamzen Stringham). Please revise to include this.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-050-Pinion-Juniper Woodland Encroachment

Letter 803, Comment 428

4.4.1.1 Page 4-49: After taking into account our previous comment regarding p-j woodland encroachment impacts on water; please acknowledge that BLM does have authority of thinning and restoration projects. BLM should propose mitigation to treat the encroaching woodlands and acknowledge that current and future efforts such as the 3 Bars Project will help address some of these issues related to surface water quantity.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-050-Pinion-Juniper Woodland Encroachment

Letter 803, Comment 429

4.4.2.2 Page 4-50: The BLM continues to resist requests to correct errors on figures provided in the DEIS. For example, the title of Figure 4.4.1.is "Cumulative Action Scenario – Projected Water Table Drawdown at Project Year 44, End of Year 2055, Relative to Pre-Development (1955) Conditions." In contrast, the explanation to the figure (alternatively referred to as a legend) refers to the "10-Foot Drawdown Contour Maximum Extent." These are not the same thing, they confuse the general public during their review, and would have taken minimal effort to change. BLM's response has been and continues to be that the certain figures were prepared by third parties and that they cannot make changes to these third-party figures. By virtue of having poured through the two ADEISs and the supporting documents, we can decrypt the intent of a particular mislabeled figure, but the general public cannot. Please correct errors to figures to facilitate the public's review and understanding of the Project and to comply with requirements. Please refer to our previous comments on both ADEIS and the DEIS to see which specific figures still have outstanding errors or discrepancies.
Disposition: Analysis modified (SEE RESPONSE)

Response
The explanation in the figure has been corrected in Figure 4.4.1 in the FEIS.

Letter 803, Comment 430

4.4.7 Page 4-56: Despite our previous comments, the vegetation resources section must more fully consider the area or full water drawdown and the potential impact to phreatophytes, riparian areas, and meadows. These issues are not adequately addressed in this section. This is especially important given the fact that Nevada's water law requires the capture of ET of these discharge areas when putting water to beneficial use. This cannot continue to be downplayed.
Disposition: Other (SEE RESPONSE)

Response
The potential impacts to riparian vegetation (and seeps and springs) and mitigation are discussed in section 3.11.3.3.

Letter 803, Comment 431

4.4.10 Page 4-61: Include "pinion-juniper woodland encroachment and expansion" into actions that affect past, present, and future range resources.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-050-Pinion-Juniper Woodland Encroachment

Letter 803, Comment 432

4.4.13 Page 4-64: Recreational access is also affected by the condition of the road. Increased use will cause degradation of roads (paved, gravel, and two-tracks) that could substantially reduce access by making roads unsafe or less than enjoyable to travel. Please revise to include discussions of this.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

Road conditions and vehicle effects on roads are outside the scope of the recreation analysis.

Letter 803, Comment 433

4.4.15 Page 4-65: There are a host of proposed projects surrounding the town of Eureka which should be identified in this section with discussion on the potential number of employees and associated population that might live in the area. There is a real possibility of substantial cumulative impacts that should be addressed.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-005-Socioeconomics Cumulative Impacts

Letter 803, Comment 434

4.4.21 Page 4-72: Please provide more discussion regarding pinion-juniper woodland encroachment and expansion into actions that affect past, present, and future wildlife and fisheries resources.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-050-Pinion-Juniper Woodland Encroachment

Letter 803, Comment 435

4.4.21 Page 4-73: Even with the change that BLM made to the DEIS, it is not defensible to say that "none of the perennial drainages...would appear to be affected hydrologically." How do these drainages that fall within the maximum extent of water drawdown not exactly "appear" to be affected? There is not enough data to make this conclusion and the arbitrary use of the 10 foot drawdown contour does not take into account the full range of impact that could occur. Roberts Creek, one of the perennial drainages, is at ground zero of the largest water drawdown attributable to the Project. There is also drawdown expected at the headwaters of Henderson Creek, another perennial drainage that is also an LCT recovery stream. These impacts all "appear" on the figures under the water drawdown contour. Revise to clarify that certain fisheries are predicted to be impacted by water drawdown and then frame mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response

The text in the FEIS has been revised to read as follows, "Even though none of the perennial drainages, including those that support sport fisheries, would appear to be affected hydrologically by the other past, present, and RFFA projects, there is a potential to affect stream flow through ground water pumping from the Proposed Action and thus affect the fisheries."

Letter 803, Comment 436

4.6.15 Page 4-81: The statement that there would be a net benefit on both social and economic values in Eureka County is extremely subjective and incorrect. In general, the socioeconomics section fails to recognize the social aspects of socioeconomics. Very important social issues such as custom and culture, perceptions of safety, social blight, and increased domestic issues can be overwhelmingly negative even when economics (i.e., local tax revenues) are positive. The actual impacts related to both economic and social aspects of the Project vary considerably within demographic groups. For instance, what benefit will a farmer in Diamond Valley realize from the Project when every service that they require or want is already provided by Eureka County and the local schools currently without the Project. Please revise analysis to give more weight to the social aspects of Eureka County that may be impacted.
Disposition: Analysis modified (SEE RESPONSE)

Response

The first sentence in Section 4.6.15 has been changed as follows: "The identified projects within the CESA, including the Partial Backfill Alternative, would have both a positive and potentially adverse impact on social and economic values in Eureka County."

Letter 803, Comment 437

4.9 Page 4-101: The DEIS still does not acknowledge or make the connection that there could be irreversible and irretrievable impact to water quality in relation to the pit lake, spring decline, stream degradation, etc. Once impacted, these sources will never have the same quality as before the Project. Revise to take this into account
Disposition: Comment acknowledged; does not provide new information

Response

Potential impacts to water quality are discussed in detail in Section 3.3.3.3 of the EIS. Pumping of ground water and potential impacts to surface water flows are evaluated and also identified as an irreversible and irretrievable commitment of resources in Table 4.9-1. There is a distinction, however, between environmental impacts and the "commitment of resources". The BLM has determined, consistent with the practice for similar mining EIS's in Nevada, that the potential impacts identified in the comment (and in the EIS) do not represent an irreversible and irretrievable commitment of resources for purposes of NEPA. The BLM has fully considered potential impacts to water quality and the use of water resources without regard to the specific NEPA terms that different parties might choose to describe those potential impacts. No changes to the text of the EIS have been made to address this comment.

Letter 803, Comment 438

4.9 Page 4-101: Table 4.9-1 still reports "No" regarding irretrievable impacts to soil resources. This cannot be true given the fact that erosion, by definition, is the loss of soil. Once lost, it cannot be retrieved. What about the potential for soil lost through wind erosion in the salt desert scrub areas (phreatophytes)? Further, the engineering estimates themselves account for 10% loss of soil due to disturbance. Revise text and make the "No" a "Yes."
Disposition: Analysis modified (SEE RESPONSE)

Response

Table 4.9-1 has been revised to read "Yes" as Irretrievable.

Letter 803, Comment 439

4.9 Page 4-101: This statement regarding the irreversible and irretrievable impacts to air resources is suspect, especially given the exceedance of the new 1 hour NO2 standard.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-053-Air Quality Modeling

Letter 803, Comment 440

4.9 Page 4-102: The loss of wetlands and riparian zones still does not account for the full impact that could occur under the full extent of water drawdown. Please revise to speak towards these impacts. Further, Wetland and Riparian Zones are still listed as a "No" for Irretrievable, but again we disagree due to the length of time it will take for the aquifer to recharge and the possibility of never recovering to previous conditions.
Disposition: Comment acknowledged; does not provide new information

Response

Section 3.11.3 discloses impacts to wetlands and riparian zones. While some wetlands and riparian zones would be removed as a result of Project activities, others would be impacted as a result of ground water drawdown associated with ground water pumping. The wetlands and riparian zones impacted as a result of ground water drawdown would be mitigated as described in Section 3.2.3. No changes have been made in the FEIS in response to this comment.

Letter 803, Comment 441

4.9 Page 4-102: This still focuses primarily on economic benefits and does not give enough weight to fiscal impacts or social disruption. There is substantial operations and maintenance required to keep up the infrastructure upgrades related to the Project. This is a long-term commitment and could be a major impact once the Project ceases. Further, Nevada is full of stories of boom and bust and the irreversible and irretrievable impacts related to the bust often outweighs any positive impacts related to the boom. Please consider this in the description.
Disposition: Analysis modified (SEE RESPONSE)

Response

"Booms" occur when a particular industry, such as mining, undergoes a rapid and large-scale expansion resulting in economic and population growth for a particular community or geographic area. "Busts" occur when there are substantial contractions in that industry, resulting in correspondingly substantial reductions in employment and in many cases, population. Busts can result unexpectedly from declines in commodity prices or other factors, or they can result from planned closures when a particular resource is fully produced. In the latter case, communities have advance notice and time to prepare for the effects of the bust. Section 3.17.3.3.4, Public Utilities and Services Effects, and the subsection on Project-Related Expenditures in Section 3.17.3.3.5, Public Fiscal Effects, discuss the infrastructure and service expansions and operations and maintenance requirements associated with development of the Mount Hope project in some detail. The Public Sector Fiscal Effects subsection also discusses the effects on Eureka County if the Mount Hope Project did not proceed, was delayed, or was prematurely terminated. The boom and bust cycles that have been experienced by many communities in Nevada, while alternately providing periods of economic and fiscal opportunity and hardship on those communities and their residents, have not in all cases been either irretrievable or irreversible. The Town of Eureka has experienced several boom and bust cycles dating back to its origins, and has over time recovered from each bust.

Moreover, no community or industry is immune to periodic downturns in economic conditions, as witnessed by the recent global recession that had particularly severe effects in certain areas of Nevada including the Las Vegas metropolitan area. If the Mount Hope Project endures for its projected 44-year mine life, the expenditures required to develop the public infrastructure in support of the mine-related population will likely have been repaid several times over. Moreover, although closure (planned or premature) could result in economic dislocation and public service staff reductions, the housing and public infrastructure would be available to support other economic activities such as other mining and geothermal projects, retirement and lifestyle migration or expansion of the tourism and outdoor recreation economy.

The adverse effects of mining busts do not in all cases or for all parties outweigh the beneficial effects of mining booms. The infrastructure created by booms in some cases has served other purposes. For example in Eureka, the historic mining booms resulted in construction of a number of buildings, which have recently been rehabilitated and are now assets for residents and for the community's heritage tourism initiatives. Additionally, the recent boom in gold mining in the northern part of the county has allowed the county to fund improvements in infrastructure and build up fiscal reserves that can be used for a variety of other purposes. Those improvements and possibly reserves will ease the transition when mining in the northern part of the county ceases. Moreover, the Mount Hope mine, because it relies on a different commodity than the northern mines, would provide an ongoing source of employment and revenue during the transition when mines in the northern part of the county cease operations.

Table 4.9-1 has been revised to state "Yes" under Irretrievable Impacts to Socioeconomic Values. In addition, the following text has been added to the end of the explanation under Socioeconomic Values, "The economic value associated with the molybdenite resources underlying the Project would be irreversible once removed. The unavoidable long-term loss of 734 acres of public land managed for multiple uses represents an irretrievable social and economic impact with respect to loss in recreation opportunity and AUMs. This irretrievable impact is relatively small when compared to the availability of recreation and AUMs in the vicinity of the Project."

Letter 803, Comment 442

5.4.4 Page 5-9: "Massy" should be "Massey"
Disposition: Factual correction made (SEE RESPONSE)

Response

The text has been revised to "Massey".

Letter 803, Comment 443

Please consider expanding the glossary to include more technical terms unfamiliar to the public including the following:
The terms, adit, open stope, drift, and prospect will all be unfamiliar to laymen. Give some description or definition or expand the glossary to include these specialized terms. Xeric is a word most people will be completely unfamiliar with. Define the word or add it to the glossary. "Propylitically" is an obscure word that should be included in the glossary along with many of the terms in the section. Section 3.3.2.2.3 Page 3-174 is another example of the need for an expanded glossary.
Disposition: Factual correction made (SEE RESPONSE)

Response

The following terms have been added to the glossary in the FEIS, "adit", "open stope", "drift", "prospect", "xeric", and "propylitic".

Letter 803, Comment 444

Index Page 7-2: "HAS" should be "HSA"
Disposition: Factual correction made (SEE RESPONSE)

Response

The text has been revised to "HSA".

Letter 803, Comment 445

Changes that we requested under various mitigation measures throughout the document that were placed in the Mitigation Summary Plan in Appendix C must cascade through to the Appendix itself. Further, we reviewed and commented on the various mitigation components in the appendices as they were submitted as baseline reports primarily including the WRMoP and the Wild Horse and Wildlife Water Source Mitigation Plan. The comments that we made on these individual plans still apply and are included by reference into our comments here. We ask BLM to please refer to these previous comments and specifically reply to each comment and make requested changes as we have yet to receive any response from BLM regarding these previous comments. We have attached these previous letters and comments to assist BLM in its response. We have also attached a memo entitled, "Mt. Hope Project Water Resources Monitoring, Management, and Mitigation History and Concerns" that was prepared in response to EML's July 2010 WRMoP which is substantially the same as the WRMoP in Appendix C.
Disposition: Comment acknowledged; does not provide new information

Response
The BLM has considered all Eureka County comments on baseline reports and the two versions of the Administrative DEIS and made changes to the text or incorporated the comments into mitigation as determined appropriate by the BLM.

Letter 804

Comment 1

We support the continued practice of mining and "multiple use" on our public land and the Proposed Action Alternative, with modifications
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 804, Comment 2

Require no Backfill. Backfilling is expensive and serves no significant environmental benefit in weighing the additional fuel required to backfill vs the potential evaporation from the pit lake. The BLM does not address the economic impact of this alternative on the project. In addition, a significant recreational opportunity exists from a pit lake that is not addressed. If the surface stockpiled (potential pit backfill) is sloped, contoured and allowed to be naturally seeded, over time it would be indistinguishable from the surrounding terrain
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 804, Comment 3

Require no Off-Site Transfer of Concentrates for Processing. There is no economic or environmental benefit to an off-site processing of concentrate. Keep all the process and the mine together! This will reduce roads, water, power and transport impact. It will allow security of one site, not two. Transport of concentrates would increase the carbon footprint and cost of the final sellable product.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 804, Comment 4

No Slower, Longer Project Alternative. Allow Eureka Molly, LLC to design, build and operate their mining and process facility to optimize economy of scale for mining and process. There is no economic or environmental reason to lengthen the mine and process life to be longer than that Eureka Molly, LLC proposed in their plan of operation. Insisting on a longer mine life could tip the balance of the economic viability of the project.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 804, Comment 5

Any alternative to the proposed action must be based upon "sound science and engineering." The BLM must economically evaluate any alternative to Mount Hope's proposed action. Great socioeconomic impacts could occur from the BLM adopting any alternative, which is not thoroughly evaluated economically in the DEIS
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 804, Comment 6

I strongly recommend the Proposed Action with modifications of no backfill, no off-site processing, and no longer project alternative.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 805

Comment 1

The Bailey Ranch should be considered a Sensitive Receptor and be included in the maps and studies used in the Environmental Impact Statement. A good illustration of this is (my Figure 1) on page 3-267 of the text (United States, 2011, Volume 1, pg. 3-267, figure 3.6.2). The only Sensitive Receptor used for the study that is within this figure is the Roberts Ranch. However, the Bailey Ranch is also within this area near the northeast corner of the nested Cartesian receptor grids. Our farm and four residences on our farm are also within the grid a little more than half way down the east side of the figure. The next page, p. 3-269 (my Figure 2), shows which way the wind blows (United States, 2011, Volume 1, pg. 3-269, figure 3.6.3). Clearly, it blows directly towards the Bailey Ranch from the project area. The four residences are close, three plus miles due east from the tailings, but are not recognized as such.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-119-Diamond Valley Sensitive Receptors

Letter 805, Comment 2

Idaho General Mines, Inc., General Moly, Inc., Eureka Moly, LLC, Kobeh Valley Ranches LLC and any other entities that are clearly connected to the Mt. Hope Project should be included in the maps and studies of the land that the mine owns or controls. On page 1-1 of the DEIS, the last sentence on the page states,

In determining the scope of the Proposed Action, the BLM has determined that actions on private lands are connected actions with those proposed on public lands (40 CFR 1502.4 (2) and 40 CFR 1508.25(a)). This EIS will also analyze impacts from private land activities. (United States, 2011, Volume 1, pgs. 1 1 — 1-2)

An example of this is on page ES-13 of the DEIS which does not include the Romano Ranch as Project Land Ownership (United States, 2011, Volume 1, pg. ES-13, figure ES-2). There are other lands owned under various names also not shown in Diamond Valley, Kobeh Valley and the Town of Eureka (United States, 2011, Volume 1, pg. ES-13, figure ES-2). Figure 1.1.2 has the same issue (United States, 2011, Volume 1, pg. 1-5, figure 1.1.2). What the mine does at the Romano Ranch or the Dubrey Farm will definitely affect us as well as other properties currently owned or purchased by mining interests in the future.
Disposition: Comment acknowledged; does not provide new information

Response

CC-093-Private Property Impacted by the Project

Letter 805, Comment 3

I believe that some of the major issues have not been studied where I live. This action on public and private land will significantly affect private land owners and residents in Diamond Valley and Eureka County. The surface water at both the Bailey Ranch and the Romano Ranch already have gone dry from over appropriation making any further dewatering or pumping a serious issue. With the decline of the water table and global warming issues, the trading of water, air quality, soil and forage for mineral wealth and urban populations may create a possible shortage of agriculture in the future. Currently the ranching and agricultural resources in this county raise enough beef to feed every person in the county beef every day, sustainably. Hopefully we will be able to continue the western legacy of ranching and agriculture at the Bailey Ranch as well as in Eureka County's Natural Resource Portfolio for generations to come.
Disposition: Other (SEE RESPONSE)

Response

This comment is beyond the scope of analysis of this EIS.

Letter 805, Comment 4

My Figure 3 shows Private Property Ownership in Diamond Valley. Mount Hope Mine is located on Highway 278. On the Sadler/Brown Road is a ranch owned by Idaho General Mines, Inc. (Mount Hope Mine). The next ranch is owned by our family. Directly south of Mount Hope Mine on Hwy 278, the first farm is owned by our family. Both properties are close enough to Mount Hope Mine to be affected by dust, drainage, smoke, traffic, noise, and the possibility of damage to our business from any drawdown, cone of depression, or any drop in the static level from the added use of water by the mine. The farms and ranches in Diamond Valley are not represented fully in the DEIS.
Disposition: Already addressed in planning documents

Response

CC-064-Scope/Scale of Impacts in EIS

Letter 805, Comment 5

My Figure 4 shows a Serious Drainage Issue. This is serious because it drains from the proposed Potentially Acid Generating Waste Rock Disposal Facility elevation of 7,550 feet (United States, 2011, p. 2-23) and the pit directly toward the farms and residents in Diamond Valley at 5,800 feet elevation (Eureka County, 2004).
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 805, Comment 6

Mt. Hope Potentially Acid Generating Waste Rock Disposal Facility is in a Flash Flood Area. Mt. Hope DEIS uses 24 hour 100 year event data for planning (United States, 2004). A 24 hour 100 year event is very different than a flash flood. The 100 year data is basically if the weather station at Eureka Airport collected data for 100 years, what their highest rainfall in a 24 hour period was (U. S. Geological, 2011). Then it is said that there is a 1% probability that there will be that much rain this year (a new highest rainfall amount could be added this year, or it can happen two years in a row). There are also 1 hour 100 year events, 100 year drought levels, 50 year, 500 year, 48 hour, and so forth (U.S. Geological, 2011). The USGS states that during intensely localized storms, rainfall amounts throughout the basin can differ greatly from the rainfall amount measured at the location of the rain gage. Some parts of the basin may even remain dry... Another factor to consider is the relation between the duration of the storm and the size of the stream basin in which the storm occurs. For example, a 100-year storm of 30-minutes duration in a 1-square-mile basin will have a more significant effect on stream flow than the same storm in a 50-milebasin. (U.S. Geological, 2011, pg. 2)
According to the National Weather Service, floods are the most common weather-related natural disasters and "flash floods are the most dangerous kinds of floods, because they combine the destructive power of a flood with incredible speed and unpredictability (National Weather, 2011, pg. 1)."
In the mountains, where terrain channels the flow of water, rocky, dry packed soil or bedrock keeps precipitation from percolating into the ground. Thunderstorm precipitation rates can be high as well over mountainous terrain, so that the combination can lead to flash floods with rainfall of only an inch or two. (National Weather, 2011, pg. 1)
There have been flash floods observed in Garden Pass including events that have partially and totally washed out the Sadler Brown Road (Figure 4). One flash flood washed a pickup and horse trailer off of Highway 278 causing the owners to rescue the pinned horses (Parman-Dempsey, 2011). According to the National Weather Service, in order to monitor storms in Eureka, a beam is sent from Battle Mountain (personal communication, December 18, 2011). Mountains are in the path of the beam between Battle Mountain and Eureka. Consequently, the beam is sent at 6000' higher, to clear the mountains, creating a situation where only the strongest storms are visible (personal communication, December 18, 2011). Even with data considered sparse in the area, there were Flash Flood Warnings issued for Central Nevada on the following dates:
September 16th, 2011 at 1:56 pm
July 31st, 2011 at 5:01pm July 31st, 2011 at 4:48pm June 15th, 2009 at 7:01 pm August 1st, 2007 at 5:22 pm
July 31st, 2007 at 2:30 pm (personal communication, December 18, 2011, and NOAA weather)
Linda L Dempsey
HC 62 Box 62111
Eureka, NV 89316
775-237-5750
December 20, 2011
To Whom It May Concern
It has been several years ago, August 1977, I had just finished showing horses in Eureka at one of the first Eureka County Fairs. Since I was competing for Hi point Junior Horse in Elko Nevada my husband and I headed out to make the show in Elko. We planned on staying in Elko, showing horses the next day. It was a cool evening and we had been rained on at the show in Eureka. As we were traveling to Elko on Hwy 278 we were met by Mr. and Mrs. Norman Rebaleati who were returning from Elko. They blinked their head lights at us trying to warn us as we approached the Garden Summit area. But unfortunately it was too late. We hit a wall of water coming down and across Hwy 278 just after the Sadler Brown turn off. It hit us with such force it washed our pickup truck and horse trailer off the road. We had water coming in the truck and my horse was in water up to her belly standing in the trailer. We had to cut the trailer door open to get her out. She was bruised and scared. We were forced to return home. I have great appreciation and thanks to Bill Hick for his help when he arrived with the State Hwy truck.
As a kid riding the Eureka County School Bus from the ranch to school I have seen flash floods before, leaving those big washes in that area. It can be raining above on Mt. Hope and sunny down below, the water can come with such force, washing ponds, roads, highways' and anything else that gets in the way completely out. I have seen these floods come, washing the Sadler Brown Road complete out. This area is prevalent to flash floods.
If anyone has any questions I would be happy to answer them.
Sincerely,

Linda Parman Dempsey
Linda grew up on the Diamond Springs Ranch which her family owned. She currently owns property on Hwy 278 near the Dubrey farm.

A Flash Flood Warning "is issued when a hazardous weather or hydrologic event is occurring, imminent or has a very high probability of occurring (The City of, 2012, pg. 1)." Some dirt work has been done at the mine that may disguise this fact, but the evidence is there on satellite photos and on the Sadler Brown Road. On one side where the road washes out, the ditches have been filled with dirt and reclaimed, thereby erasing the ditch. On the other side of the road, someone has tried to fill the ditch with a huge pile of used wire, a refrigerator, etc., to hold the road from washing out again.
Disposition: Other (SEE RESPONSE)

Response

Section 2.1.7.4 explains that there will be additional capacity in the diversion structures beyond the 100-year, 24-hour storm event by stating: “Storm water that has not contacted mining components would be diverted around the process area through permanent diversion structures. The permanent diversion and collection structures would be sized for the 100-year, 24-hour storm event with additional capacity to allow less frequent maintenance and would have the capacity to safely pass the inflow design flood peak flow during operations and at closure. Diversion channels associated with the WRDFs would be constructed to collect and divert nonimpacted waters.” Additionally, a Stormwater Management Plan has been included in Appendix 7 of the Plan of Operations and includes best management practices, monitoring, and reporting requirements as part of the Water Pollution Control Permit issued by the Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Mining Regulation and Reclamation.

Letter 805, Comment 7

The projected changes in climate (increases in temperature, reductions in soil moisture, and more intense rainfall events) could increase the possibility of these events. This data should be studied in reference to uncontrolled acid rock drainage, or other contaminants moving through the down gradient water system causing impacts to the waters of Diamond Valley and the State of Nevada.
Disposition: Other (SEE RESPONSE)

Response

This analysis is beyond the scope of this EIS.

Letter 805, Comment 8

Acid Mine Drainage can occur from under the "low permeability base layer" of the PAG WRDF (United States, 2011). Acid Mine Drainage can occur from Flash Floods breaching the collection channels and collection ponds. Acid Mine Drainage could occur from a breach in the .06 inch liner under 966 million tons of tailings. Acid Mine Drainage can occur when the pond liners are cut at closing (United States, 2011, p. 2-85). Acid Mine Drainage can occur from a landslide, earthquake or pipeline rupture. Evapotranspiration cells for storm discharge may be difficult to install because of the volume of waste and the steep slope (United States, 2011, pg. 2-86). Leached constituents including remobilization of heavy metals into the soil and water supply would be very hard to mitigate. In addition, page 3-595 of the DEIS states:
"Post-mining pit lake is potentially predicted to exceed the calculated screening level toxicity criteria (United States, 2011, pg. 3-595)."
Millions of gallons of water will fill the pit where 2.7 billion tons of ore were removed. Throughflow that infiltrates the pit wall will move through and into the downgradient ground water system and gradually evolve as the readily soluble chemical mass and be rinsed out into Diamond Valley (United States, 2011, p. 3-221). Proponents of the mine may confuse pit lake toxins to be low because they are not intended for livestock or humans and there will be a permanent fence to barricade the pit forever (United States, 2011, p. 3-402, 3-425, 3-206, 3-219). This information provided in the DEIS contradicts what Mount Hope Mine tells the public. Eureka Moly touts "Satisfactory water quality in post-mining pit-lake. (Eureka Moly, 2011, pg. 1)"
Disposition: Comment acknowledged; does not provide new information

Response

CC-015-WRDF Cover Design

Letter 805, Comment 9

There could be a huge economic burden if the mine company files bankruptcy or refuses to cover treatment costs. The Interstate Technology & Regulatory Council Mining Waste Team identified two general problems:
• Mining-impacted waters are difficult to treat cost-effectively to levels protective of human health and the environment.
• Solid mining waste is not a specifically regulated waste and involves huge volumes of material. The volume of material alone makes some of the techniques for minimizing

the risk unreasonably costly. On the other hand, the exposure posed by direct and indirect ingestion of some of this waste is a major health and ecological concern. (ITRC, 2008, pg. iv)
Disposition: Other (SEE RESPONSE)

Response
CC-117-Reclamation after Project Completion

Letter 805, Comment 10

I believe that by the time the Nevada Division of Environmental Protection could detect a health risk at a well in Diamond Valley, the situation would be irreversible and irretrievable. The BIM includes goals to manage any discharges from process components (United States, 2011, p. 1-9). This project puts human health and the environment at risk. FIGURE 4 shows the drainage from Mount Hope Mine directly toward Diamond Valley residents. I believe Figure 4 showing the drainage from Mount Hope into Diamond Valley demonstrates Significant Criteria (p. 3-196) for significant impact.
Disposition: Comment acknowledged; does not provide new information

Response
Monitoring required by the BLM, NDEP, and NDWR would include sites immediately adjacent to the process facilities so that ground water impacts would be detected well before they would reach Diamond Valley. Facilities would be designed to prevent discharges as described in the EIS and required by regulation. The post-mining pit would form a terminal pit lake so there would be no drainage toward Diamond Valley. No changes to the text of the EIS have been made to address this comment.

Letter 805, Comment 11

Diamond Valley is a closed basin that was over appropriated when farmers settled here. Consequently, Diamond Valley is in a deficit of inflows vs. outflows. The state engineer committed 133,000 acre feet of water before it was known that the recharge is only 30,000 acre feet (my figure 7). This has caused the water table in Diamond Valley to drop between one and two feet per year depending on location. In 2006, the U.S. Geological Survey reported drops in the water table of 26 to 90 feet at 67 wells (Tumbusch & Plume, 2006) (my figure 8 and 9). There is a lot of concern among the farmers and ranchers that adding a huge water consumer will exacerbate our already serious problem.
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Letter 805, Comment 12

There have been times when there have been chances to help remediate the situation which have gone unused but not unrecognized. The use of water for Mount Hope Mine will clearly exacerbate the problem with the obvious predictability of impact.
Discussion and mitigation about a five foot or ten foot drawdown, does not address the rate that the actual water table (static level) is currently dropping every year. If the water table continues to drop two feet per year, that will add an additional 140 foot drop during the mine's 70 year life (the water needed for mitigation is not discussed in the DEIS). This is without Mount Hope Mine.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 805, Comment 13

The amount of water Mount Hope Mine will use is significant. The result is predictable. Harm will come to the current users. The drop in the static level will be exacerbated causing wells to go dry. This is a desert. It is even possible the underground water source we use may even be totally exhaustible.
The drawdown from pumping and dewatering will certainly add to the problem, especially considering that the mine will be using the water all year without a chance to turn the pumps off for recharge, but the water table (static level) drop has shown to be permanent.
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 805, Comment 14

How can a five foot or ten foot drawdown be measured when the static level is dropping at the same time and the wells and dewatering at the mine are continuous? The Mine will be pumping for years without stopping for well recovery. What about the dropping static level (actual water table) because of over appropriation? Current users may be put out of business and mine mitigation could become difficult if water is unavailable or in short supply. The static level will NEVER recover in 400 years with the current, pre mine, inflows vs. outflows.
This is critical because p.ES-21 of the DEIS states there will be mitigation for a water right holder if the drawdown is more than ten feet (United States, 2011). Diamond Valley farms irrigate onto the surface where some water percolates back into the water table. They typically turn the irrigation pumps off for six months. Does mitigation begin when the static level, in spring when drawdown from agricultural irrigation has recovered for six months, has dropped ten feet at the Bailey farm?

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 805, Comment 15

P. 3-401 and page 3-388 of the DEIS both say:
Mine dewatering and ground water pumping subsequent recovery of the water table is expected to draw down the ground water table in an area surrounding the open pit. As discussed in Section 3.2, modeling results show significant water table drawdown in the aquifer would occur in an area measuring approximately 232 square miles around the Project Area. (United States, 2011, pg. 3-401) (United States, 2011, pg. 3-388)
What a confusing statement. Drawdown, well recovery, and static level are different things. The static level (water table) will never recover at the current, pre-mine inflows vs. outflows. At current pre-mine inflows vs. outflows, the static level will drop in areas of Diamond Valley 140 feet in a 70 year mine life. Pumping and dewatering for Mount Hope Mine will exacerbate the already serious problem.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 805, Comment 16

The pit is located in Diamond Valley. The DEIS states, "modeling (by the mine) results show a significant water table drawdown in the aquifer would occur in an area measuring approximately 232 square miles around the Project Area, including the northeast quadrant of Kobeh Valley and the southernmost fringe of Roberts Mountains (United States, 2011, p. 3-401)", yet page 2-18 of the DEIS says, "80 percent of the pit dewatering water would be from Diamond Valley" (United States, 2011, pg. 2-18). It does not make sense that Diamond Valley would not be affected at all. Isn't the significant drawdown at Roberts Mountain, because of dewatering in Diamond Valley? Is the mitigation water for Roberts Creek in Pine valley supposed to come from Kobeh Valley? I know Kobeh Valley and Roberts Mountain are both in the Diamond Valley Flow System.
There has been much discussion about how the mine water use will not affect Diamond Valley because it is a different water basin. P. 3-55 shows inflows to Diamond Valley from Kobeh and Pine Valleys. The mine will be pumping water at a different time (year round) and at a much closer location. The dewatering is in Diamond Valley.
Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 805, Comment 17

How much water will be required to fill the pit at closing? 44 years of removing 2.7 billion tons of ore will leave a gigantic pit lake. How many gallons of water from Diamond Valley will be lost from beneficial use to become toxic pit water. I did not read in the DEIS how much water will be lost to evaporation from the pit lake.
Disposition: Comment acknowledged; does not provide new information

Response

The specific amount of water to fill the pit lake is not a static value since there would be evaporation from the pit lake over time. The total amount of water in the pit lake has not been calculated because the value does not affect the analysis of the potential impacts. The amount of evaporation from the pit lake is disclosed in Section 3.2.3.3 of the EIS. No changes to the text of the EIS have been made to address this comment.

Letter 805, Comment 18

I did read in the DEIS on p. 3-96 and 3-97 that 9000 gallons per minute will be required for mitigation of Roberts Mountain and Henderson Creek for the proposed pipeline. This water usage should be accounted for, and mitigated. I am concerned about how all of this will affect our springs and wells.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-062-Mitigation of Diminished Water Flows

Letter 805, Comment 19

Many of the maps and studies do not include the Bailey ranch or farm in Diamond Valley. The surface water at our ranch as well as the Romano Ranch listed in Figure 3 as Idaho General Mines, Inc. has already dried up. This is significant. We are a significant water right holder in Diamond Valley and will be affected (Figure 5).

Disposition: Other (SEE RESPONSE)

Response

The current ground water conditions at the ranches in Diamond Valley were not caused by the proposed Project. The potential impacts to ground water from the proposed project are disclosed in Section 3.2.3.3 of the FEIS.

Letter 805, Comment 20

Also, the plan to artificially recharge the natural springs and streams that Mount Hope assumes will go dry, from their dewatering actions, will certainly change the flora and fauna in the area. If the efforts are not timely, destruction will occur. The water intended to be piped to the streams could be water captured from the same source. If the source is pumped dry, mitigation becomes impossible. A water modeler told me that, "there are better uses for water than surface forage (personal communication, January 4, 2007)." I disagree.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 805, Comment 21

As a senior water right holder, I am making this "call" to do no further damage to the senior water rights. The ranches surrounding the Mount Hope Project are the senior right holders. The farms in Diamond Valley are second in line. The Mount Hope Mine has purchased water from these senior right holders with the intention of changing their time, place and purpose of use. The changes in the uses of the water in the Diamond Valley Flow System, including Kobeh Valley, will have adverse affects to the senior water right holders. Farmers and ranchers are rightly concerned. I believe the project would violate the Water Rights Policies of the Nevada Division of Water and the Water Policies of the Bureau of Land Management regarding the prior appropriation doctrine.
Disposition: Other (SEE RESPONSE)

Response

The NDWR has issued EML their water rights for the Project. As outlined in Section 3.2 of the FEIS, the potential impacts to water resources has been analyzed. The NDWR is the regulatory agency in the State of Nevada responsible for the ajudication of water rights.

Letter 805, Comment 22

How much water would it take to wet 8,318 acres of disturbed Nevada surface so that it is not dusty during mine operation? The Tailings Storage Facility is three plus miles east of the Bailey Farm. What is the mitigation?
Disposition: Already addressed in planning documents

Response

CC-120-Dust Control Mitigation

Letter 805, Comment 23

When we are trailing a herd of cattle nearby or horseback riding in our yard, will the dust we breathe contain toxic fugitive dust from the tailings facility? I do not understand the use of tailings drain water as a means of dust control. Is it toxic? Will it dry and become airborne particulates to be deposited onto soil and vegetation surfaces?
Disposition: Already addressed in planning documents

Response

CC-120-Dust Control Mitigation

Letter 805, Comment 24

It seems to be that the best available data for air quality is from Ely and Elko. Wind direction data is from Mercury. If the air quality degradation from Mount Hope's roaster were to be measured at the Bailey ranch or farm, would the air quality there make it considered a "Minor Stationary Source?" In my Figure 1, I have added the location of The Bailey Ranch and Farm as well as the Romano Ranch, (owned by Idaho General Mines) to DEIS Figure 3.6.2. My Figure 1 shows the location of the Bailey Ranch and Farm. My Figure 2 shows the wind direction according to the DEIS Figure 3.6.3. The Bailey property is so close to, and in the direction the wind would take the roaster/smelter smoke, that the impacts should be studied for this location and the location considered a Sensitive Receptor. None of the Sensitive Receptors used for the DEIS are downwind from the roaster (United States, 2011). Meaningful monitoring should be required at a place that is actually downwind from the facility.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 805, Comment 25

What does it mean to say that:
"Fugitive emissions would be adverse but not irreversible (United States, 2011, pg. 3-291)."
Disposition: Other (SEE RESPONSE)

Response

Once the Project is completed and reclaimed, then the fugitive dust emissions would stop, because the disturbed surfaces would be reclaimed.

Letter 805, Comment 26

Will the 600,000 tons of Greenhouse Gasses per year (United States, 2011, p. 3-294), and other Particle Pollutions (sulfur dioxide, arsenic, lead, cadmium, mercury), come down as wet or dry acid rain and affect the surface forage, including the aspen groves that capture more rainfall because of their elevation? What about the forage we grow at the Diamond Valley farms and feed our livestock? Are we considering the range and soil outside the project area? Does Eureka County plan to monitor air quality locally, and what will Eureka County do if the air quality is considered unhealthy at night or in the morning when the mixing heights are low? Toxic metals from Molybdmum roaster flue dust could be carried into watersheds and soil by wind and be capable of disrupting essential physiological processes causing human illness and impacting vegetation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 805, Comment 27

Where would the toll roasting come from? Would it be restricted to molybdenum?
Disposition: Comment acknowledged; does not provide new information

Response

Section 2.1.5 of the EIS states that the concentrates would come from other mines and that they would be molybdenum concentrates. No change has been made to the EIS in response to this comment.

Letter 805, Comment 28

How can Mount Hope tout the facility as "Designed as zero-discharge facility (United States, 2011, p. 2- 66, DEIS and Eureka Moly, 2011, pg. 1)"? 600,000 tons per year is not zero. According to the DEIS there are no air quality standards for Hazardous Air Pollutants (United States, 2011, p. 3-293). This does not mean the same as zero pollutants. It means there is no limit to exposure.
Disposition: Other (SEE RESPONSE)

Response

The project will be permitted as a Zero-Discharge facility by NDEP. The 600,000 tons per year will be disposed in the lined, engineered TSF, which is not a discharge.

Letter 805, Comment 29

All three sizes of particles are toxic. Health issues are significant for my family, Diamond Valley residents, and other down winders. The cumulative air impacts for the study (p. 3-294 DEIS) do not include 600,000 tons of Greenhouse Gasses or any other airborne metal flue dust particulates. The Eureka Moly LLC (Mount Hope Mine) Tailings Siting Evaluation (Appendix A ,DEIS) does not discuss

DEIS COMMENTS 20
Fugitive Dust from tailings outside the project area. What are the combustion emissions for the roaster and will it heat up Diamond Valley?
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-107-Modeled Air Quality Impacts

Letter 805, Comment 30

There are no mitigations for these issues.
Disposition: Comment acknowledged; does not provide new information

Response

CC-107-Air Quality Monitoring and Mitigation

Letter 805, Comment 31

The impact from Air Pollutant Concentrations are not considered significant because they do not include any Sensitive Receptors downwind from the project and because there are no standards for Hazardous Air Pollutants. We consider impacts to the health of Diamond Valley residents, the surface forage, soil and, watersheds to be significant, and we are concerned.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 805, Comment 32

The DEIS states, "the Clean Air Act delegates primary responsibility for air pollution control to state governments, which in turn often delegate this responsibility to local or regional organizations. (United States, 2011, pg. 3-257) How will Eureka County mitigate Mount Hope Mine's emissions?
Disposition: Other (SEE RESPONSE)

Response

In the State of Nevada the legislature has delegated authority to implement the requirements of the Clean Air Act to the Nevada Bureau of Air Pollution Control, except in Washoe and Clark Counties. Eureka County has no authority to implement requirements of the Clean Air Act. All regulatory authority for the control of air pollution is under the State of Nevada, through the Nevada Bureau of Air Pollution Control. No changes to the FEIS text have been made to address this comment.

Letter 805, Comment 33

Cumulative Impacts to soils (p. 4-55, DEIS) do not include impacts from flash floods or seepage underneath the Potentially Acid Generating Waste Rock Storage Facility at Mount Hope Mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-110- Impacts to Soils

Letter 805, Comment 34

Cumulative impacts to soils (p.4-55, DEIS) do not include impacts from 600,000 tons of Greenhouse Gasses per year or other metal flue dust particles landing on soils outside the project area from Mount Hope Mine.
Disposition: Comment acknowledged; does not provide new information

Response

CC-110- Impacts to Soils

Letter 805, Comment 35

Cumulative Impacts to soils (p. 4-55, DEIS) do not include fugitive dust prior to capping or leakage from Tailings Storage Facilities at Mount Hope Mine landing in or on soils in Diamond Valley.
Disposition: Comment acknowledged; does not provide new information

Response

CC-110- Impacts to Soils

Letter 805, Comment 36

Cumulative impacts to vegetation (p. 4-57, DEIS) do not include damage to vegetation outside the project area from 600,000 tons per year of Greenhouse Gasses or other metal flue dust particulates from Mount Hope Mine.
Disposition: Already addressed in planning documents

Response

CC-108-Scope of Cumulative Impacts

Letter 805, Comment 37

Cumulative impacts to vegetation (p. 4-57, DEIS) do not include impacts to vegetation from fugitive dust or water shortages in Diamond Valley from Mount Hope Mine.
Disposition: Already addressed in planning documents

Response

CC-108-Scope of Cumulative Impacts

Letter 805, Comment 38

Cumulative impacts to soils and vegetation do not include impacts from all the mines already existing in Eureka County or Nevada.
Disposition: Other (SEE RESPONSE)

Response

CC-130- Cumulative Effects Analysis

Letter 805, Comment 39

Impacts to soils and vegetation could be significant and are not included for where I live or Diamond Valley.
Disposition: Other (SEE RESPONSE)

Response

CC-130- Cumulative Effects Analysis

Letter 805, Comment 40

What a contrast to the noise and visual impact of haul trucks driving by our residence
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 805, Comment 41

We do not have air pollution at our home now. Our skies are beautiful. If we were to have smoke, it would be a stark contrast.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 805, Comment 42

Nevada Department of Transportation requested Mount Hope Mine build a new turn lane at the entrance to the mine on Highway 278. Would Mount Hope Mine pay a sufficient amount of taxes to add passing lanes and bus safety pullouts? How many deaths would be required before the infrastructure is installed?
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-019-Roads and Traffic

Letter 805, Comment 43

Who is going to be responsible for picking up the new trash on Highway 278?
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-069-Mitigation for Impacts to Highways

Letter 805, Comment 44

Mount Home Mine made a gravel pit at the Romano Ranch and plans to use the gravel for construction. I am concerned about trucks hauling on the Sadler Brown Road in Diamond Valley.
Disposition: Other (SEE RESPONSE)

Response

Section 3.24 of the FEIS has been revised to include construction traffic in the impact analysis. The construction traffic includes the delivery of aggregate to the Project.

Letter 805, Comment 45

How can Mount Hope tout the facility as "Designed as zero-discharge facility (United States, 2011, p. 2- 66, and Eureka Moly, 2011, pg. 1)" when the DEIS estimates probabilities of releases and spills resulting from probable truck accidents on page 3-547 (United States, 2011)?
Disposition: Other (SEE RESPONSE)

Response
The term "zero-discharge facility" refers to requirements associated with the Water pollution Control Permit issued by the BMRR.

Letter 805, Comment 46

Mount Hope is the view from my kitchen window. Just as important to me is the fact that my residence and many others are directly adjacent to Highway 278. P. 4-55 of the DEIS, Cumulative Impacts to Visual Resources, does not include traffic through the "dispersed pinpoints of light that are ranches. (United States, 2011, pg. 4-55)" Highway 278 appears peaceful and safe today. This would be a significant impact from the Mount Hope Mine. The change from an agricultural setting to an industrial one would be a significant concern.
Disposition: Other (SEE RESPONSE)

Response
Sections 3.6.3, 3.7.3, and 3.24.3 disclose the potential impacts to Air Resources, Visual Resources, and Transportation and Access as a result of implementation of the Project. No changes to the text of the FEIS have been made to address this comment.

Letter 805, Comment 47

The DEIS says, "The predicted changes in hourly ambient noise levels at the nearest ranch houses are 1dB or less. (United States, 2011, pg. 3-46)" I believe this is a false statement and my home is not represented.
Disposition: Already addressed in planning documents

Response
CC-095-Noise Impacts to Residents

Letter 805, Comment 48

P. 4-65 of the DEIS Cumulative impacts to auditory resources does not effectively represent the impacts from traffic noise at my home from Mount Hope Mine traffic on Highway 278.
Disposition: Already addressed in planning documents

Response
CC-095-Noise Impacts to Residents

Letter 805, Comment 49

"Visual, noise, or atmospheric elements that are out of character with a property alter its setting (United States, 2011, p. 3-579)." Right now we live near "the Loneliest Town on the Loneliest Road in America", and We Love Lonely (reference title of original artwork by Larry Bute). The increase in traffic will generally degrade the quality of life here.
Disposition: Already addressed in planning documents

Response
CC-095-Noise Impacts to Residents

Letter 805, Comment 50

P. 4-66 of the DEIS, Cumulative Impacts to Socioeconomic Resources, incorrectly represents that the increase in tax revenues to Eureka County would likely outweigh any adverse effects on social and economic values in Eureka County (United States, 2011).
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 805, Comment 51

With the mines in the north end of Eureka County and the small population, Eureka County is financially stable without Mount Hope Mine. Eureka does not need jobs (United States, 2011, p. 3-501); we will not be able to fill our own jobs (United States, 2011, p. 3-502). Those persons in Eureka County that are unemployed are either unemployed by choice or are unemployable. They will not be any more employable for Mount Hope Mine than they would be for Barrick Mines or Newmont Mines.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 805, Comment 52

The school system in southern Eureka is high achieving and the education of our children will be compromised. New students entering the system typically are behind as soon as they enter because of Eureka's current high achievement. The system will be inundated with new students compromising the quality of the small school system, and the quality of education currently enjoyed.
Disposition: Already addressed in planning documents

Response

CC-066-Impacts to Schools in Eureka

Letter 805, Comment 53

Crime will increase, especially since the mine would bring 600 new employees for construction instantly, who have nowhere to live. Mount Hope Mine is not clear about where they would house all of those people. We are very concerned that a man camp at the Romano Ranch would definitely reduce the integrity of the setting at the Bailey Ranch. The Eureka Canyon Project is not complete and would not have enough units.
Disposition: Other (SEE RESPONSE)

Response

Section 3.17.3 of the EIS discloses the potential socioeconomic impacts to the community resulting from implementation of the Project. No changes to the text of the FEIS have been made to address this comment.

Letter 805, Comment 54

It feels like an Environmental Injustice to possibly displace the "weaker section" of agriculture, for mining. Farmers and ranchers may not be considered "Low-Income Populations" or "Minority Populations," but they certainly do not have the resources to vie for natural resources against multi¬national mining interests. Eureka County has a tiny population that can be taken advantage of without representation. How can agriculture survive in Diamond Valley, when China reportedly invested 600 million dollars in the Mount Hope project? The community, people, and their affairs are being artificially "engineered" by foreign bankers.The politics of Eureka County will change because the population in the community will double specifically with mining constituents where now 71% of Eureka's mining employees live and vote in Elko County (United States, 2011). Agriculture has a strong political position in local politics now.
The impact to our cultural resources would be irreversible and irretrievable. The Western Shoshone say that:
Impacts to water sources impact all other resources as well as animals that utilize the water and plant foods for survival. Once the water is gone, then life is gone (United States, 2011, Pg. 3- 581).
Environmental injustice and the affects to our culture are significant to the residents of southern Eureka County.
Disposition: Other (SEE RESPONSE)

Response

The effects to the local politics as a result of an increase in the population of Eureka County is beyond the scope of this EIS.

Letter 805, Comment 55

When I tried to contact the Nevada Burea~ of Health Protection Services about Mount Hope Mine's Radioactive Material License (p. 1-11, DEIS), the Bureau didn't seem to exist (how much radioactive material is going to be used at the mine, what is the half-life and where will it end up?)
Disposition: Other (SEE RESPONSE)

Response

The radioactive materials are incorporated into a density measuring tool that is used to detemine the amount of ore in slurry flowing through process pipes or on conveyor belts. The tool is mounted on the outside of the process pipes or on a conveyor. When the tool is removed from the process pipes for decommissioning, the radioactive source material is removed for appropriate management.

Letter 805, Comment 56

I think the theme of the DEIS is "The impact is not considered Significant." Nearly every single study ended with that phrase. I honestly appreCiate the effort put into the study and application process, but it feels like there will be "zero releases" "Designed as zero-discharge facility" (United States, 2011, p. 2-66, and Eureka Moly, 2011, pg. 1) and "The impact is not considered significant" really means that there are no releases nor are there any significant impacts to anything or anyone that is not considered expendable.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 805, Comment 57

If the Mount Hope mine Project goes forward with the plan represented in this Draft Environmental Impact Statement, ranchers, farmers, and the community of Eureka will be significantly affected. The Mount Hope Project Draft Environmental Impact Statement does not effectively represent where I live or those to the north, east, and south of the project. It does show some of the impacts, but does not show acceptable mitigation for those impacts.
Disposition: Other (SEE RESPONSE)

Response

The DEIS discloses the potential impacts from the implementation of the Proposed Action or the alternatives. The analysis of certain resources in the FEIS has been revised, where appropriate, to include the locations of the nearest residences to the Project Area.

Letter 806 (F1) through Letter 808 (F1)

See Letter 248 for form letter text and response.

Letter 809

Comment 1

I strongly urge adoption of the NO ACTION alternative
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 809, Comment 2

To do otherwise would violate the WFHBA on many points in addition to NEPA, since the proposed action would constitute a significant negative impact on the formerly healthy and vital Roberts Mountain Complex wild horse herd.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 809, Comment 3

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (Felis concolor) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 809, Comment 4

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future.
Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 809, Comment 5

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 809, Comment 6

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 809, Comment 7

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 809, Comment 8

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros … and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 809, Comment 9

Finally: if we take "multiple use" to mean a balanced representation of all the values and presences on the public lands taken as a whole, then the proposed action through its undermining of the relatively minor presence of wild horses in their small fraction of the public lands where they have a legal to live – clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, the Multiple Use and Sustainability Act and others.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 810

Comment 1

I am writing in support of General Moly's Mount Hope project that is under review. While mining definitely has an impact on the environment, it is essential to the way we live. Technology and life as we know it is not possible without minerals, and minerals have to come from the ground.

It is our responsibility in the mining industry to minimize the impact of extracting the products that society needs; unfortunately there is an unavoidable trade-off between limited environmental impact and living in a technological age. Everyone knowingly or unwittingly accepts the trade-off every time a product is purchased, the lights are turned on or interacts in our society. The most ardent mining opponent in America owns a lot of rock in tailings impoundments around the world. Electricity doesn't come from the outlet in the wall, and i-pads don't appear of their own volition at the Apple store.

There are at least a billion people worldwide with no indoor plumbing or electricity. The world demands a higher standard of living, and it is disingenuous for those of us with two cars and a two thousand square foot house to say that the environmental damage must stop now. At the same time, the US economy is hurting. The minerals needed to lift the most impoverished people in the world into the age of toilets that flush into a treatment plant instead of the street at their doorstep will have to come from somewhere. Let's put Americans to work producing a salable product instead of just selling debt to the Chinese. Mining is no longer the environmental disaster it once was, mining in the US is an efficient and highly technical industry that is held to strict standards.

Please approve the Mount Hope Project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 811

Comment 1
I have worked in the Nevada mining industry for over 35 years, including a number of years in the permitting and compliance arena at major gold mines.

I have reviewed the proposed Mount Hope Project EIS and the associated Preferred Alternative. I find the proposed plan by General Moly and the evaluation by the BLM to be reasonable. I fully support the project; it will provide long-term benefits to Northern Nevada while minimizing the environmental impacts to the extent possible.

Thank you for taking my comments into consideration.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 812

Comment 1
As a property and business owner in Nevada, who is a supplier of products to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine
In Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are still suffering from the worst economy in decades, and Nevada is at the bottom of the list for unemployment. It seems to me the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will help diversify the mining industry in Nevada and will bring much needed economic development.
I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly has assured me that they are committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 813

Comment 1
Page 3-77 states that at the end of mining, drawdown of 10 feet or greater will be experienced at 18 spring locations. Figure 3.2.18 shows the extent of projected drawdown at this time and identifies 13 springs within the 10 foot drawdown contour. This figure should be modified to include the additional springs mentioned in the text.
Disposition: Factual correction made (SEE RESPONSE)

Response
At the end of mining, 12 springs would be within the 10-foot drawdown contour as shown in Figure 3.2.18 in the EIS. The EIS text has been corrected accordingly.

Letter 813, Comment 2

The last three lines of page 3-78 and the first two lines of page 3-85 provide a discussion of impacts to water rights, and mitigation for adverse effects. However, taken in context, the reader could conclude that mitigation would only be required for adverse impacts to water rights associated with the Pete Hanson Decree. It is suggested that a sentence be added so that the text reads: "…The decree grants water rights subject to restrictions on points of diversion, season of use, and total duty. In addition, water rights have been granted for sources not associated with the Pete Hanson decree, also subject to points of diversion, season of use and total duty."
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 813, Comment 3

The word "subject" on the first line of page 3-85 should be changed to "under". The Nevada Division of Water Resources (NDWR) has sole authority to administer water rights in Nevada and to require mitigation for impacts to water rights. The NDWR would be responsible for determining whether observed impacts warrant mitigation and what mitigation, if any would be required. To provide for adequate information to make this determination, NDWR has required EMLLC develop a Monitoring, Management and Mitigation (3M) Plan. This plan would be approved by NDWR once deemed satisfactory. Water rights for the Mt Hope Project are under the jurisdiction of, and granted by NDWR, and it is improper for the BLM to assume the responsibility for mitigation of water rights within the NDWR - administered program.
Disposition: Other (SEE RESPONSE)

Response

The word "subject" has been changed to "under".

Letter 813, Comment 4

The phrase "For the purposes of this analysis…" in the first complete paragraph on page 3-85, should be changed so that the sentence reads: "For the purposes of developing mitigation measures, it was conservatively assumed that all of the springs located in this area are interconnected with the regional groundwater system and could be potentially impacted due to water table lowering attributable to the Proposed Action". The conservative assumption was made for development of mitigation as opposed to analysis of environmental impacts, and the suggested change would clarify this point.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-039-Assumptions of Scope of Impacts to Springs

Letter 813, Comment 5

EMLLC suggests revisions to the text on pages 3-86, 3-99, and 3-100 regarding impact assessment and mitigation measures for surface water quantity (Section 3.2.3.3.1). Specific concerns and issues are:

5.1 The relationship between Mitigation Measure 3.2.3.3-2a (page 3-86 and Table 3.2-9) and Mitigation Measure 3.2.3.3-2b is not clear. Mitigation Measure 3.2.3.3-2a specifies mitigation measures that would be implemented if BLM determines that there are reduced flows in perennial stream segments or springs that are attributable to mining. Then, Mitigation Measure 3.2.3.3-2b states that if flow decreases attributable to mining are noted, mitigation measures would be implemented. Assuming that the first mitigation measure is implemented, then the trigger for the second mitigation measure would seem to have already been reached, and mitigation would already have been implemented. These two measures should be combined into a single measure.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-008-EML Mitigation Comments

Letter 813, Comment 6

Mitigation Measure 3.2.3.3.2a includes a description of monitoring. Monitoring is already included as part of the Proposed Action and should not be included as a mitigation measure. Rather, monitoring is implemented to provide information to assist in the determination of whether mitigation will be required.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-008-EML Mitigation Comments

Letter 813, Comment 7

Although Table 3.2-9 provides specific mitigation measures, it is unrealistic to conclude that these mitigation measures will absolutely be the desirable approach, especially when impacts may occur decades in the future. BLM may well determine that alternate approaches are more desirable. A sentence should be added to the text of Mitigation Measure 3.2.3.3.2a (to be developed as a combination of Mitigation Measure 3.2.3.3.2a and Mitigation Measure 3.2.3.3.2b) stating that instead of, or in addition to, the mitigation measures provided in Table 3.2-9, BLM may require other mitigation measures, and reference the bulleted measures that are now listed separately under Mitigation Measure 3.2.3.3.2b
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-008-EML Mitigation Comments

Letter 813, Comment 8

In some cases, the text is not consistent with the sub-section heading, such as mitigation discussion in the "Significance of Impact" subsection, or impact analysis discussion within the "Effectiveness of Mitigation" section.
Disposition: Factual correction made (SEE RESPONSE)

Response

Where these inconsistencies have been found in the EIS, they have been corrected.

Letter 813, Comment 9

5.5 EMLLC agrees that it becomes more difficult to predict, at this time, impacts that may occur after cessation of mining. However, mitigation of any impacts should be as effective as mitigation that is conducted during mining operations, as they are also specifically intended to directly address the impact by restoring or enhancing surface flows, and because the measures would be reviewed and addressed by the BLM. Thus, the sentence beginning near the bottom of page 3-99 and ending on the top line of page 3-100 should be deleted.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-008-EML Mitigation Comments

Letter 813, Comment 10

The replacement flow amounts specified in Table 3.2-9 should be revised. Potential impacts due to the proposed project would result from a lowering of the water table. Thus, the potential project-related impacts could not possibly include a reduction of snow pack or the freshets and runoff resulting from snowpack melts. JBR's July, 2011 technical memo is cited as the source of flow rates in Table 3.2-9. However, the JBR memo includes a summary of numerous flow measurements for each source. It appears that the most recent flow measurement from this summary memo has been used in the DEIS. Instead, Table 3.2-9 should define the existing conditions as a range of flowrates or clearly state that the current values are the most recent measurements from the monitoring data collected to date. Additionally, it is not clear how the mitigation flow amounts were determined. For some sites, a flow of 0 gpm (gallons per minute) is reported and mitigation is established as a replacement flow rate of 0.5 gpm. For a site with "0" flow, the trigger (cessation of flow) to provide "replacement" flow would already have been reached, whereas prior to project approval, it is not possible that a project-related impact has occurred. This inconsistency with the intent of the mitigation plan can be resolved by eliminating a mitigation requirement for sites that do not have flow. Table 3.2-9 should be corrected to state a mitigation flow rate equal to the baseline flow rate for each source. EMLLC has compiled the baseflow amounts for use in Table 3.2-9 in a technical memorandum attached to this letter. Finally, the mitigation flows in the table should be stated as "flows of up to _____ gpm". It is acknowledged that a reduction in flow, as opposed to complete cessation may require mitigation. Thus, the required mitigation flows may be less than the complete replacement amount.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-008-EML Mitigation Comments

Letter 813, Comment 11

Table 3.2-9 refers to pipeline lengths and existing roads. A figure should be added to show the location of these features so the reader better understands the mitigation specified in Table 3-2.9.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-104-Clarification of Mitigation Measure Impacts

Letter 813, Comment 12

EMLLC suggests that the mitigation measure 3.2.3.3-3a (pages 3-103 and 3-104) be removed. This section includes mitigation for sources that could potentially be impacted, conditioned upon the sources having a valid water right. Administration of water rights and the authority to mitigate impacts to water rights clearly lies with the NDWR, and by attempting to mitigate water rights, per se, the BLM may be eroding the defensibility of the EIS through inadvertently and improperly extending its jurisdiction.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-008-EML Mitigation Comments

Letter 813, Comment 13

Section 3.6.2 includes a description of air dispersion modeling performed to characterize the project and assist in evaluating impacts. Based on recently developed guidance from EPA on modeling methodology and the availability of on-site meteorological data, the modeling has been updated with the BLM's concurrence. EMLLC will submit the results of this updated modeling under separate cover and we suggest that it be incorporated in to the FEIS to provide a more precise analysis and assessment.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 813, Comment 14

Section 3.23 includes Mitigation Measure 3.23.3.3-6 for impacts to sage grouse. This mitigation measure also references the pygmy rabbit mitigation proposed under Mitigation Measure 3.23.3.3-9. However, the text incorrectly refers to Mitigation Measure 3.23.3.3-8.
Disposition: Other (SEE RESPONSE)

Response

The text for Mitigation Measure 3.23.3.3-6 has been revised in the EIS to read, "...Additional mitigation developed for pygmy rabbits (Mitigation Measure 3.23.3.3-9) would reduce …".

Letter 813, Comment 15

Section 3.23 includes Mitigation Measure 3.23.3.3-8 for impacts to golden eagles that could potentially be significant. However, the proposed mitigation consists solely of monitoring. It is proposed that the mitigation measures be strengthened by inclusion of habituation techniques. Habituation techniques suggested by L.A. Romin and J.A.Muck (1999, Utah Field Office guidelines for raptor protection from human and land use disturbances. U.S. Fish and Wildlife Service, Utah Field Office. Salt Lake City. 42pp) would be applicable to the Mt Hope project. Specifically, if activities such as blasting were begun in summer or fall, birds potentially nesting in proximity to the project area would be expected to either become habituated to the disturbance or seek another location for nesting. The reference also suggests that pre-disturbance signals such as sounding sirens prior to blasting may be effective in limiting negative raptor responses to blasting; sounding sirens prior to a blast will be standard practice at Mt Hope. Additionally, the discussion on the significance of the impact should consider that the aspect of the cliff area identified as golden eagle nesting site is such that it is shielded from activity at the mine site. In addition, the nest site is oriented toward Highway 278 and within approximately 1/2 mile of this highway. Thus, golden eagles that use the nest likely are exposed to greater sensory stress from highway traffic than would be experienced from the mine activities.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-041-Golden Eagle Mitigation

Letter 813, Comment 16

The discussion on Pygmy rabbits on page 3-628 references Figure 2.23.2; the correct figure number is 3.23.3.
Disposition: Other (SEE RESPONSE)

Response

The text in the EIS has been revised to read, "As shown on Figure 3.23.3 . . ".

Letter 813, Comment 17

On the fifth line from the bottom of page 3-100; "stockwatering" is misspelled.
Disposition: Other (SEE RESPONSE)

Response

The typo has been corrected.

Letter 814

Comment 1

I am writing to you today in support of the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

In this economic climate, it is more important than ever to return the nearly 400 critically needed jobs to Nevada. This is a paramount decision for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining. Your support for this project will be greatly appreciated.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 815

Comment 1

The mining industry is one of the bright spots in an otherwise bleak economy. Please approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

If a well-planned, environmentally-friendly mine that employs nearly 400 Americans could be up and running within 18 months, who wouldn't support its approval? General Moly has proposed such a project at Mount Hope and it deserves approval. In these tough economic times, it makes sense to support this project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 816

Comment 1

We propose that the BLM follow option one, deny the permit for the mine at this time.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 816, Comment 2

If the BLM decides to grant the permit We suggest the 50% option, this will mitigate at least partially some of our concerns
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 816, Comment 3

The proposal by EML contains a reference to consumption of 40,000 GAL/day of diesel fuel in off-road equipment , this level of consumption is greator fuel use in one week than used in Diamond Valley and the town of Eureka on an annual basis. We believe this will have signifigant impacts on air quality especially in Diamond valley not addressed by the BLM. Diamond valley is a basin, not unlike Los Angeles or San Jose , Calif. WE have a temperature inversion present in the atmosphere on many days which will trap polluttants.This also applies to dust pollution as the owner and operator on two farms/ranches downwind of the mine [closest 10miles] we are very concerned about dust and particulates and their impact on crop production.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 816, Comment 4

In conclusion, we think at least the 50% option will mitigate to some degree the air pollution, will reduce water consumption and will reduce the expected impacts to the social, economic, and infrastructure of our little community.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 817

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

The growing worldwide steel industry needs a reliable source of molybdenum. I appreciate the planning that General Moly has exhibited in its proposal for the Mt Hope mine and wish to thank the BLM for its consideration in moving this project forward.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 818

Comment 1

I wholeheartedly support development of the Mount Hope molybdenum project in Nevada, for the contributions this project can make to the economic viability of our state and nation. I believe that all environmental concerns have been adequately addressed and that the project can be developed and operated without negative impact to the air or water quality in the area. Nevada and the United States of America needs to develop our resources and invest in our future in order to remain strong and be able to maintain the high standard of living that comes with self-sufficiency.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 819

Comment 1

PLEASE CHOOSE THE NO ACTION ALTERNATIVE!
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 819, Comment 2

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 819, Comment 3

Our wild horses are under your protections, please allow them to remain so, free & wild with water to drink throughout Nevada & the other Western states. We must not serve special interests over our wild horses & burros, especially those outside of our country!
Disposition: Other (SEE RESPONSE)

Response

Comment noted.

Letter 819, Comment 4

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 820

Comment 1

The project will require 7,000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is NOT acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 820, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for this project. To arrive at any record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance".
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 820, Comment 3

The proposed impact to the populations of effected wild horse HMAs is unacceptable. The population numbers are already below genetic viability and the potential impact to water in the legal grazing areas is NOT acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 820, Comment 4

The project will take away a large amount of acreage from three HMAs. Roberts Mountain has over 13,000 acres, within the scope of the project, with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance. This is NOT acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 820, Comment 5

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered, then new boundary lines should be mitigated to ensure that Wild Horse populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. If acreage is lost than adjacent, equal acreage must be provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 820, Comment 6

The project does not fully study the impacts and potential areas for mitigation for Wild Horses. The project has not fully studied what the loss of such a huge amount of water will have on the already fragile sources available to wild horses and all living things in this area.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 820, Comment 7

The "NO ACTION" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 821

Comment 1

I wanted to extend my support for the Mt Hope project. We are a company that markets and sells industrial grade LED technology specifically to mining companies. Our lights are designed to systemically improve safety, efficiency, mechanical downtime, and the environment. We believe that the mining industry and the extractive industries in general can take the lead in developing responsible practices to reduce waste, improve efficiencies and develop best practices around resource mitigation. Our efforts as a company are to assist in co-creating these outcomes for our mining customers. We need mining, and mining needs the inputs and solutions smaller adjacent industries bring to their support.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 822

Comment 1

As a supplier of safety products to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, begin construction, and start mining operations.

Nevada currently has one of the worst economies in the country and the mining industry is the one true bright spot in the state. The Mt. Hope Mine will help diversify a thriving mining industry even more and help bring the Silver State much needed economic development.

I've read reports that the Board of Eureka County Commissioners are continuing to delay the permitting process for General Moly's Mt. Hope project, by putting up unfounded and unnecessary obstacles. These actions by the commissioners could jeopardize not only the Mt. Hope project, but other future natural resource projects. The Eureka County Commission has been well-funded for many years by mining taxes.

From what I have read, the Mt. Hope project is an environmentally sound project and General Moly is committed to environmental stewardship. The company is prepared to comply with established policies and regulations, which are enforced by agencies such as the State of Nevada and the BLM.

Yes, the molybdenum mine at Mt. Hope will directly benefit our company, its employees, and their families, but it will also have a strong economic effect for other suppliers of both products and services around our state. This is a worthwhile project that will substantially augment the economy of Nevada and its citizens, at a time when it is sorely needed.

We would like to add our name to the list of those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not just for our company , but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 823

Comment 1

The DEIS uses a 10 ft draw down contour which does not adequately measure effects to springs and wet meadows. The DEIS needs to use a 1ft and a 5 ft draw down so that adequate monitoring and mitigation can be implemented on negatively impacted springs and meadows
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 823, Comment 2

The Mount Hope project will pump most of its water needed for the project from Kobeh Valley, which is upstream from Diamond Valley in the Diamond Valley Flow System. Diamond Valley is experiencing a water depletion problem now that can only be made worse by pumping in Kobeh Valley. The water model shows a 2 ft draw down in 44 years in Diamond Valley as a result of the Mount Hope project pumping. I believe that the model may be seriously flawed in its prediction and that the effects will be far worse than predicted.
Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 823, Comment 3

No one can say for sure what the effects will ultimately be, but the economic and environmental impacts are predicted and the EIS must provide mitigation of these effects before they happen. The reason for this is that all the evidence to-date already proves that water is being depleted in the Diamond Valley Flow System. If the Mount Hope project is going to use water from an already depleting source then they have a responsibility to mitigate the problem before they ever begin the project.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 823, Comment 4

The farmers in Diamond Valley have worked for four years to help General Moly understand that the water challenge in the area is of grave concern. We offered that if the mine would help retire water, and contribute to the conservation of water, that we would allow them water for their mining project. General Moly has not made a good faith effort to mitigate the water problem and has behaved in such a manner that would indicate that they have no concern for the protection of our most valued natural resource, water. Because of this past behavior it is of the utmost responsibility of the B.L.M. to insure that the mine be made accountable to mitigate water in the DEIS, before the mine begins operation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 823, Comment 5

The DEIS does not demand adequate funding for mitigation of water impacts or air impacts that will be effected in Diamond Valley, Kobeh Valley or Pine Valley. A Trust needs to be established and funded by General Moly at the beginning of the project that will insure financial ability to mitigate all water, air, noise, and any other impact that the DEIS has identified impacted by the Mount Hope project. This fund needs to be large enough to not only cover impacts for the life of the mine but for 200 years after. The water model shows that the water effects will go on for four hundred years.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 823, Comment 6

The DEIS continuously states that monitoring is a form of mitigation. Monitoring is not mitigation. Monitoring is monitoring and is a tool to measure effects caused so that mitigation can be implemented. The DEIS needs to say that all monitored effects must be mitigated. The DEIS also needs to insure that this mining project provides financial ability to mitigate all measured effects by demanding that funding is made available with bonding, but preferably trust funds. The Mount Hope project that is being mined by

General Moly, or any other mining company MUST provide financial ability to perform mitigation. The DEIS DOES NOT at this time do that It is my belief that the current DEIS plan for mitigation is a disaster. The Mount Hope project will have such a huge environmental effect on southern Eureka County from a water and air aspect that the BLM has a duty to insure that these effects are minimized or at least adequately mitigated. The detrimental financial effect on Diamond Valley irrigators from water supply, water contamination, and air quality, from the Mount Hope project could be so significant, that the whole farming community could be made nonviable. The DEIS must insure that adequate mitigation and funding is in place.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 823, Comment 7

I did not see any place in the DEIS that explored the possibilities of moving the well field back to the Bobcat Ranch. It is the responsibility of the BLM to explore all scenarios that would limit the negative effects that this project would have. If the well field was moved to the Bobcat Ranch, the negative effects that will certainly happen to the Roberts Creek Ranch and all the springs and seeps on the entire Roberts Mountain, all water on the Pine Valley drainage, and the effects to Diamond Valley would surely be minimized. This should have been included in the DEIS evaluation.
Disposition: Other (SEE RESPONSE)

Response

EML currently has water rights that allow the production of ground water from the areas proposed in the DEIS. Section 3.2.3.3 of the DEIS incorporates mitigation measures that include moving the wells should the BLM determine this is necessary. No changes to the FEIS have been made to address this comment.

Letter 823, Comment 8

The risk of ground water contamination from two sources, the open pit and the tailings pond are significant. Not only is the Mount Hope project going to use water that is in a declining state, this project has the potential to significantly effect the quality of ground water in Diamond and Kobeh Valleys.
Disposition: Already addressed in planning documents

Response

The model predicts very steep ground water gradients toward the pit during mining and after the end of mining; therefore, the risk of contamination leaving the pit is insignificant. Similary, the tailings pond will be constructed with a liner and drainage system that will minimize hydrostatic head on the liner and the risk of ground water contamination from this source is not significant. Section 3.3.3 of the EIS discloses the potential impacts to surface and ground water quality as a result of implementation of the Proposed Action. No changes to the text of the EIS have been made to address this comment.

Letter 823, Comment 9

The open pit will certainly collect rain and snow run off that will seep through the open pit and infiltrate back into the Diamond Valley ground water. The DEIS does not deal with or provide adequate monitoring or mitigation for this possibility.
Disposition: Other (SEE RESPONSE)

Response

The collection of precipitation is accounted for in the ground water flow model and the pit lake geochemical model. Section 3.3 of the EIS discloses monitoring and mitigation, where appropriate, for water quality issues.

Letter 823, Comment 10

I did not find any discussion for what would happen if there were a breach in the pond liner in the tailings pond caused by earthquakes or any other reason. This is surely going to happen. A pond this size will certainly have leaks. The monitoring and mitigation outlined in the DEIS does not adequately addressed this issue.
Disposition: Comment acknowledged; does not provide new information

Response

CC-077-Water Quality Associated with Storage Pond

Letter 823, Comment 11

The air quality in Diamond Valley is exceptionally clean and contributes to the high quality hay that is raised there and shipped around the world. When the air quality changes, even if it meets federal air quality standards what will be the monitoring and mitigation to the Diamond Valley farmers? The air contamination from the roaster combined with dust from the toxic tailings pond and dust from traffic and overburden will affect Diamond Valley, which is down wind from all of these operations. The DEIS does not require

sufficient air quality monitoring or mitigation for air quality. Again the DEIS is a disaster when it comes to monitoring and mitigation for air quality.
Disposition: Comment acknowledged; does not provide new information

Response
CC-107-Air Quality Monitoring and Mitigation

Letter 823, Comment 12

The farmers in Diamond Valley realized many years ago that in order to insure that weeds and rodents, like pocket gophers, squirrels and meadow voles were controlled that there needed to be a way to insure that these things were monitored and controlled. One of the reasons that Diamond Valley hay is shipped worldwide is because Diamond Valley hay is free from noxious weeds and dirt contamination. Diamond Valley Irrigators formed the DV weed and rodent control districts to insure that these things do not become a problem. I need to make the BLM aware of this because General Moly has purchased irrigated farmland in Diamond and Kobeh Valleys. General Moly is not in the farming business and has little or no concern of how there poor stewardship of these purchased properties is having a negative impact on the surrounding farmers in the area. General Moly has taken no measures to control weed or rodents on these properties. The BLM needs to incorporate a monitoring and mitigation plan for weed and rodent control not only on irrigated farmland that GMO has purchased but also on any and all property involved with the mining operation.
Disposition: Other (SEE RESPONSE)

Response
A noxious weed monitoring plan is included in the Mount Hope Plan of Operations. The BLM does not have the authority to require a monitoring and mitigation plan for weed and rodent control on private land.

Letter 823, Comment 13

The Federal Land Policy and Management Act of 1976. FLPMA, directs that the BLM manage our lands so they" BEST MEET THE PRESENT AND FUTURE NEEDS OF THE AMERICAN PEOPLE" and take into account "THE LONG-TERM NEEDS OF FUTURE GENERATIONS FOR RENEWABLE AND NON RENEWABLE RESOURCES... In this DEIS the BLM fails to establish the need for this project
Disposition: Other (SEE RESPONSE)

Response
CC-111-FLPMA Compliance

Letter 823, Comment 14

The least that you must due is ensure that extensive monitoring and meaningful mitigation measures are in place to help compensate the negative effects this project will have
Disposition: Already addressed in planning documents

Response
CC-113-Project Mitigation and Monitoring

Letter 823, Comment 15

I urge the BLM to adopt the NO ACTION ALTERNATIVE as described in ES-2 to ES-3 in volume 1 of the Mount Hope Project DEIS.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 824

Comment 1

monitoring lacking for water impacts
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 824, Comment 2

the monitoring for air quality is a disaster or at best not sufficient

Disposition: Comment acknowledged; does not provide new information

Response
CC-107-Air Quality Monitoring and Mitigation

Letter 824, Comment 3

The mitigation recommendation in this DEIS are insufficient in most all areas
Disposition: Comment acknowledged; does not provide new information

Response
The FEIS includes revised mitigation measures, which address comments made on the DEIS during the public comment period.

Letter 824, Comment 4

First of all in many cases the recommended mitigation measure is listed as monitoring. Monitoring is not mitigation. Monitoring is just that, monitoring. Mitigation is action to minimize or compensate for impacts.
Disposition: Other (SEE RESPONSE)

Response
The commenter is correct that monitoring is not mitigation. However, where monitoring is discussed it is tied to specific mitigation measures and the monitoring is used as part of the mitigation implementation to determine triggers and/or effectiveness. No changes to the FEIS have been made to address this comment.

Letter 824, Comment 5

The mitigation recommendations are useless without proper funding in place to ensure that mitigation will happen. It is the responsibility of the BLM to insure that mitigation will be funded and this DEN does NOT come anywhere close to doing that
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 824, Comment 6

The BLM must insure that General Moly or any other mine that may become involved in this project has the financial ability to perform on all mitigation needed for ALL aspects of this project. It is our belief that the mitigation measures outlined in this DEIS are meaningless without proper funding or securities in place.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 824, Comment 7

The BLM needs to reevaluate the mitigation measures in all aspects of this DEIS.
Disposition: Other (SEE RESPONSE)

Response
The FEIS includes revised mitigation measures, which address comments made on the DEIS during the public comment period.

Letter 825 (F1) through Letter 833 (F1)
See Letter 248 for form letter text and response.

Letter 834

Comment 1

I strongly urge a NO ACTION ALTERNATIVE on this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 834, Comment 2

The Mount Hope open-pit mining project would be contrary to the mandates of the Wild Free-Roaming Horses and Burros Act of 1971.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 834, Comment 3

it would remove and impact countless thousands of acres of valuable habitat from, not only Wild Horses, but other wildlife as well. As we have seen from history, this kind of negative Impact reaches much further and lasts far longer than is apparent on the surface
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 834, Comment 4

The short-term, temporary gains rarely compensate for the long-term, irreplaceable losses.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 834, Comment 5

To draw that amount of water from the aquifer would negatively impact ALL life In and near the surrounding areas. That includes Human life, Animal life and Vegetable life. That would NOT MAINTAIN a thriving ecological balance.
Disposition: Already addressed in planning documents

Response

CC-064-Scope/Scale of Impacts in EIS

Letter 834, Comment 6

One foot and five foot water draw down maps must be created before arty further decisions can be made concerning this project
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 834, Comment 7

This project would be in violation of WFHBA, NEPA, the FEDERAL LAND POLICY AND MANAGEMENT ACT, the PUBLIC LANDS IMPROVEMENT ACT, and the MULTIPLE USE AND SUSTA1NABIUTY ACT, and Is, therefore, not acceptable.
Disposition: Other (SEE RESPONSE)

Response

The analysis in the DEIS does not support the conclusion reached in the comment. No changes to the text of the FEIS have been made to address this comment.

Letter 834, Comment 8

You should adopt a NO ACTION ALTERNATIVE
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 835

Comment 1

I strongly urge adoption of the NO ACTION alternative
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 835, Comment 2

To do otherwise would violate the WFHBA on many points in addition to NEPA, since the proposed action would constitute a significant negative impact on the formerly healthy and vital Roberts Mountain Complex wild horse herd
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 835, Comment 3

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (Fells concolor) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-079-Wild Horse Predators

Letter 835, Comment 4

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future
Disposition: Already addressed in planning documents

Response
CC-006-Local Hydrologic Model

Letter 835, Comment 5

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 835, Comment 6

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 835, Comment 7

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 835, Comment 8

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros ... and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 835, Comment 9

Finally: if we take "multiple use" to mean a balanced representation of all the values and presences on the public lands taken as a whole, then the proposed action through its undermining of the relatively minor presence of wild horses in their small fraction of the public lands where they have a legal to live — clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, the Multiple Use and Sustainability Act and others.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 836

Comment 1

any further lowering of the water table caused by E.M. will certainly cause the curtailment of farming on thousands of acres in D.V.,
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 836, Comment 2

causing financial devastation to many familys unless there is adequate compensation
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 836, Comment 3

As these acres revert to weeds and rodents it will cause a huge environmental problem. These things will effect the future viability of our community.
Disposition: Other (SEE RESPONSE)

Response
Section 3.10.3 of the DEIS does disclose the potential impacts of noxious weeds and invasive species resulting from implementation of the Project. No changes to the text of the FEIS have been made to address this comment.

Letter 836, Comment 4

I am also concerned about air quality degradation in South Eureka Co.
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 837

Comment 1

Americans urgently need jobs. The project at Mount Hope will provide them. Please approve the preferred alternative as proposed in the Draft Environmental Impact Statement and help get Americans back to work.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 838

Comment 1

This giant mine will have very significant long-term and irreparable adverse direct, indirect and cumulative impacts to sagebrush and pinyon-juniper wild land habitats that are critical for a host of native wildlife species. It will also deplete scarce aquifers, and reduce or kill altogether the surface expression of springs and streams in this very water-limited landscape. This will impact every component of the landscape - sage-grouse breeding, brood rearing, nesting and wintering habitats; habitats critical to pygmy rabbit populations; a Lahontan cutthroat trout stream and other intermittent and perennial flows; important untrammeled and highly scenic WSA lands; food, cover and space for wild horses; important cultural sites – and many other important elements of the environment. All the roads, transmission lines, increased human use and disturbance, as well as the impacts from the mine excavation and activity site,will radically alter this landscape and the habitat and viability of the biota that depend upon it.
Disposition: Other (SEE RESPONSE)

Response

The DEIS discloses the potential impacts from the implementation of the Proposed Action or the alternatives. No changes to the text of the FEIS have been made to address this comment.

Letter 838, Comment 2

We are very concerned that many of the issues that WWP addressed in Scoping comments for Three Bar EIS are not adequately examined in the Mount Hope DEIS. We have included these Three Bar comments, and the many concerns about elements of the environment and values of public lands that WWP raised in them and that Mount Hope, too, must grapple with.
Disposition: Other (SEE RESPONSE)

Response

Comments on the Three Bar EIS are beyond the scope of the EIS for the Mount Hope Project.

Letter 838, Comment 3

These concerns are especially pertinent to understanding all of the direct, indirect and cumulative adverse impacts associated with livestock grazing activities and management. Sage-grouse habitats and populations, pygmy rabbits, watersheds, springs, seeps, streams, upland vegetation communities – all are under great stress from the adverse impacts to soils, waters, watersheds, microbiotic crusts, native vegetation communities that are caused by the combined effects of historical and ongoing chronic grazing disturbances and other activities. See Connelly et al. (2004), Knick and Connelly (2009). Cultural sites are being altered and destroyed due to excessive erosion livestock trampling, etc. – and these processes expose artifacts to human vandalism, as well
Disposition: Other (SEE RESPONSE)

Response

The DEIS discloses the potential impacts from the implementation of the Proposed Action or the alternatives. No changes to the text of the FEIS have been made to address this comment.

Letter 838, Comment 4

Now the mine will impose a tremendous and intrusive human presence in the Eureka area. Wild landscape and tranquil areas are being destroyed by roads, night lights, transmission lines, noise. Wild space free from human disturbance is shrinking.
Disposition: Other (SEE RESPONSE)

Response

The DEIS discloses the potential impacts from the implementation of the Proposed Action or the alternatives. No changes to the text of the FEIS have been made to address this comment.

Letter 838, Comment 5

These Great Basin lands are under great stress from BLM vegetation treatments" that kill or alter native vegetation, further desertify the landscape, and provide inroads for weeds like cheatgrass to flourish. These weeds promote frequent fires, and a highly altered unnatural fire cycle. This all plays out in an arid landscape facing additional stresses from climate change processes.
Disposition: Other (SEE RESPONSE)

Response

This comment is beyond the scope of this EIS.

Letter 838, Comment 6

The New Hope mine will amplify all of these adverse effects.
Disposition: Other (SEE RESPONSE)

Response
The DEIS discloses the potential impacts from the implementation of the Proposed Action or the alternatives. No changes to the text of the FEIS have been made to address this comment.

Letter 838, Comment 7

A full accurate environmental baseline of the current setting, and the threats the Great Basin ecosystem faces, are just not provided in the Mount Hope EIS. It does not accurately or adequately portray the severity of degradation that exists, the extensive desertification caused by livestock grazing, or the risk that continued grazing and other disturbances pose to the native vegetation, native biota, and watersheds of this landscape.
Disposition: Other (SEE RESPONSE)

Response
CC-115-Baseline Conditions Used for Analysis

Letter 838, Comment 8

The DEIS's cumulative impacts analysis and land area encompassed is not adequate for understanding the full impacts to sage-grouse habitats and populations, as well as for many other rare, declining, and imperiled species. What, for example, is the current population of sage-grouse – including number of birds? How much connectivity exists between habitats and populations? How does this compare to conditions for all periods for which records were kept? How have active, historic, undetermined leks, lek locations bird numbers, etc. changed over time? What degree of interaction occurs between various PMUs here? Is this part of any Key habitat? Core habitat? Will the full footprint (noise, weeds, visual, water flow declines at springs many miles away, etc.) be considered for mitigation – or merely the acres bulldozed?
Disposition: Other (SEE RESPONSE)

Response
The BLM utilized the best available data to describe the affected environment and environmental consequences for greater sage-grouse in Section 3.23.2 and 3.23.3 of the EIS. No change has been made to the EIS in response to this comment.

Letter 838, Comment 9

It is not adequate for understanding groundwater depletion/aquifer drawdown. It is not adequate for understanding all of the other mining, oil and gas, geothermal, transmission and other activities that the affected sage-grouse habitats and populations, big game habitats and populations, and affected aquifers and watersheds face - both now, or that are foreseeable in the near future.
Disposition: Comment acknowledged; does not provide new information

Response
The BLM utilized the best available data to describe the affected environment and environmental consequences to groundwater, sage-grouse habitat and populations, big game habitat and populations, and potentially affected aquifers and watersheds. No change has been made to the EIS in response to this comment.

Letter 838, Comment 10

A SEIS should be prepared to fully provide an accurate baseline and risk assessment, and to develop suitable alternatives and mitigation. Unless the full impact of the mine development and activity is clearly understood, it will be impossible to determine:

1) Is mitigation even possible? For example, can these watersheds and aquifers really withstand even more stress and depletion without killing flows at springs?
2) How much, and what kind, of mitigation must be applied to maintain healthy, viable populations of sage-grouse, pinyon jay, ferruginous hawk, and other rare species over time?
Disposition: Other (SEE RESPONSE)

Response
Mitigation for impacts to surface water is provided in Section 3.2.3 and mitigation for wildlife impacts is provided in Section 3.23.3. No changes to the text of the FEIS have been made to address this comment.

Letter 838, Comment 11

In addressing mitigation for sage-grouse, for example, BLM must fully require analysis of the full range of threats (see Connelly et al. 2004, Knick and Connelly Studies in Avian Biology - the Sage -Grouse Monograph 2009, USFWS March 2010 Warranted But Precluded Finding for Greater Sage-grouse). What toll are the current battery of fences, roads, livestock water developments and pipelines, chronic livestock degradation of understories – taking on habitats now facing a mining and energy boom (Falcon-Gonder transmission and other lines, geothermal and just to the SE in Railroad Valley an oil and gas boom that may increase)?
Disposition: Comment acknowledged; does not provide new information

Response
CC-081-Analysis of Threats to Greater Sage-grouse

Letter 838, Comment 12

How can this project be compatible with all the conservation promises BLM leadership has been making about sensitive species, including sage-grouse that warrant ESA Listing??? Especially with all the impacts of the mining, geothermal and other booms that are right now occurring in this livestock-degraded landscape?
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 838, Comment 13

BLM must provide full and detailed analysis of the exact land areas, the authorizations, and the numbers, date and effects to resources of all mining and energy exploration proposals that have been undertaken in or near the project area for the past 20 years. Where have all been conducted? Where has development occurred, and where is it foreseeable?
Disposition: Other (SEE RESPONSE)

Response
Section 4.2 of the EIS outlines the projects and activities that are considered in the cumulative impacts analysis. Figure 4.3.5 of the EIS shows the location of the minerals projects and Section 4.3.7 discloses these projects. Section 4.4 of the EIS discloses the potential cumulative impacts associated with the proposed Project. No changes to the text of the FEIS have been made to address this comment.

Letter 838, Comment 14

Destruction of sagebrush in this project will further alter, reduce and fragment any connectivity between sage-grouse and pygmy rabbit populations across much of the District, and between the various sage-grouse PMUs.

Full and detailed analysis of all affected sage-grouse PMUs, and their habitats and populations, must be provided. BLM must include estimates of population viability with continued rates of habitat loss and the accelerated mining and energy development fragmentation in the Region must be provided.

Please provide full analysis in a worst case scenario for mining and energy development here, and the effects that will have on sensitive species, perennial flows, recreational uses, cultural sites, etc.
Disposition: Comment acknowledged; does not provide new information

Response
CC-081-Analysis of Threats to Greater Sage-grouse

Letter 838, Comment 15

BLM must act to restore sagebrush in areas where it has been removed or highly degraded in lower elevations and valley floors – not by burning trees on 60 degree rocky slopes of ranges. Give all the mining activity, mitigation should include acquisition and retirement of grazing permits. For example, the molybdenum mine now owns 2 or more permits, doesn't it? Are these within the Project Area? These should be retired as part of this EIS process, so that microbiotic crusts, understories, and sagebrush can be restored. What mines or developers hold permits here? Which allotments?
Disposition: Analysis modified (SEE RESPONSE)

Response
Mitigation measures for pygmy rabbits (Mitigation Measure 3.23.3.3-9) and greater sage-grouse (Appendix D) include requirements for off-site sagebrush habitat improvement projects.

Letter 838, Comment 16

LCT Map: HOW much water is present, and where – in Vinini and the other restoration Creeks? How is mining affecting waters? How will foreseeable expanded mining also affect this? What is the perennial length of stream here? What are the flows? How will mining aquifer depletion affect this?
Disposition: Other (SEE RESPONSE)

Response
Project-related impacts to LCT are disclosed in Section 3.23.3.3.2. Cumulative impacts to LCT are disclosed in Section 4.4.21.

Letter 839

Comment 1

Until such time that one foot and five foot water draw down maps are created, how can a proper decision be made based upon the mandate of a "thriving ecological balance"?
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 839, Comment 2

As the population numbers are already below genetic viability, the proposed impact to the affected wild horse HMA is simply not acceptable
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 839, Comment 3

In addition the populations in this area confined by boundary lines that include limited to no water, ANY move from those HMA's the impact to these areas, the repercussions to any future populations must be of primary focus since "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 839, Comment 4

Due to the fact this project will require 7,000 gallons of water per minute for the lifetime of proposed use, 40 to 50 years, and will remove more than 11,300 acre feet of water annually, this is simply NOT acceptable considering the already fragile sources available to the wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 839, Comment 5

Due to the known patters of movement of the horses in these three areas indicate the HMA boundary lines are flawed, and clearly the lack of water sources within the boundary lines indicate they were faulty at inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 839, Comment 6

The proposed project overreaches considerable acreage within the three HMA's. Roberts Mountain along has over 13,000 acres with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres with more than 3,000 projected for surface disturbance. It should also be pointed out that Fish Creek as areas with affected surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 839, Comment 7

It is apparent this project does not/has not fully studied the impacts and potential areas for mitigation for the wild horses and burros. If the project is to be considered it is necessary to ensure that populations do not go any lower than they already are, and to ensure the horses do not lose any grazing acreage available to them.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 839, Comment 8

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed. Thank you for considering my comments.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 840

Comment 1

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 840, Comment 2

The herds are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 840, Comment 3

To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance." This project encroaches on considerable acreage within three HMA's.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 840, Comment 4

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 840, Comment 5

These boundary lines include limited to no water use. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 840, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use, and will remove more than 11,300 acre feet of water annually.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 840, Comment 7

If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841, Comment 2

One-foot and five-foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 841, Comment 3

This project encroaches on considerable acreage within three HMA's.

Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance.

Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance.

Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 841, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are.

Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 841, Comment 9

The NO ACTION ALTERNATIVE must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 842

Comment 1

We are writing in support of the General Moly Mt. Hope molybdenum mine in Eureka, Nevada.
As a drilling services provider, we understand the necessary scrutiny to ensure a mine project is environmentally sound. General Moly is committed to environmental stewardship and is known for strict compliance to established policies and regulations enforced by the State and Federal agencies and authorities. It's this consistent practice that we believe should earn them the Federal and State permits to commence with construction and begin operations.
While the mine opening could benefit our company, the direct benefit to the local and state economy is greater. At a time when our country is struggling it seems illogical to reject a project that can produce significant tax revenue and employment opportunities.
Please add our names to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 843

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.
There are many good reasons to support this mine and I hope it will be approved as soon as possible.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.

Unlike other alternatives, the Proposed Alternative for the mine at Mt Hope should be supported. It takes into account the various factors of the project, such as water use and wildlife protection, while at the same time presenting a project that can be readily and profitably implemented. And the sooner this project is approved, the sooner we can put Americans to work.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 844

Comment 1

The proposed impact to the populations of affected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 844, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 844, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 844, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's, the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 844, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 844, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 844, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 844, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 844, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 845

Comment 1

I am opposed to this project for the following reasons: Per the DEIS, the Mount Hope open-pit mining project would directly remove tens of thousands of acres of wild horse and other wildlife habitat and have wide ranching negative impact on adjoining areas.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 845, Comment 2

As we all know, water is a precious resource in Nevada and the amount of water this project would use simply not acceptable for this area. Not just wild horses would be affected, but other wildlife and livestock. However, we know that should there be reduction in the amount of available, potable water in the area, the wild horses will be among the first to be removed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 845, Comment 3

This project realistically could violate the Wild Horse Protection Act which states that the horses be protected in the herd areas in which they were found in 1971 and, further, it violates the principle of that act. While I realize that precious minerals are needed for commerce, this project is simply in the wrong place.
Disposition: Other (SEE RESPONSE)

Response

Section 3.13 outlines the potential impacts to wild horses and potential mitigation for all the alternatives that are analyzed in the DEIS. No changes to the text of the FEIS have been made to address this comment.

Letter 845, Comment 4

I request that the NO ACTION alternative be chosen and that the BLM take its guardianship of the land seriously and not simply continue to act as a broker for special interests that have an undue negative impact on our public lands.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 846

Comment 1

It's with great enthusiasm that I write today in support of mining at Mount Hope. I urge approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. We need the jobs this mine will provide.

The Mt. Hope project is one of the world's largest and highest-grade deposits of undeveloped molybdenum. The property contains 1.3 billion pounds of proven and probable reserves. Developing this mine guarantees Americans can be put to work for years to come. It is estimated that this mine will operate for 80 years, ensuring a future for families in the surrounding area. Its development should be supported, the sooner the better.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 847

Comment 1

I am commenting on the proposal to grant permits of water rights to corporate uses in an already fragile eco-system such as our western deserts. this is unconscionable the Mt. Hope project going into Battle Mountain.... has been granted a permit for water by the state. It will use 7000 gallons of water per minute... (yes, per minute). BLM cannot grant the land use permit. if BLM "mitigates" the terms of the permit. The EIS calls for springs and solar wells to be added after the construction phase, but it fails to mitigate the areas of surface disruption and the effects on the horses migratory patterns in an area where VERY faulty HMA lines were drawn in the first place. They actually have the ability to "mitigate" additional acreage for forage as well as water resources, if you are to consider doing one you must do the second. WHB's are to be managed first on land use issues in accordance with the WHB act of 1971, we the American people are tired of seeing our wildlife as an after thought in land use planning and especially the abuses of the WHB lands, given to them by an entire act of Congress. We are also tired of having to sue for these rights and laws to be enforced. I respectfully ask you to take as much concern for the habitat and wildlife on these lands as you do for the financially driven endeavors.
Disposition: Other (SEE RESPONSE)

Response

Water rights in the State of Nevada are issued by the NDWR and are outside the jurisdiction of the BLM. Suggested mitigation that that is outside BLM's jurisdiction is provided in Section 3.26 of the EIS that may be required by other regulatory bodies that may have jurisdiction.

Letter 847, Comment 2

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 847, Comment 3

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 847, Comment 4

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 847, Comment 5

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-079-Impacts to Wild Horses

Letter 847, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 847, Comment 7

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 847, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 847, Comment 9

This project does not fully study the impacts and potential areas for mitigation for Wild Horses
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 847, Comment 10

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 848

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 848, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 848, Comment 3

This project encroaches on considerable acreage within three HMA's.
Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 848, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 848, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 848, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 848, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 848, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 848, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 849

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 849, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 849, Comment 3

This project encroaches on considerable acreage within three HMA's.
Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 849, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 849, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than
11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 849, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 849, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 849, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 849, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 850

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are not at genetic viability now and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 850, Comment 2

The horses must be the first thought as is required by Congress. Not the last thought after cattle, industry, mining, and energy. Remember "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 850, Comment 3

If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 850, Comment 4

Again, we see that the required consideration of the horses is not taken into account at all.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 850, Comment 5

We must be certain that the viability of the herds remain
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 850, Comment 6

This study must be completed with no action taken at present and the effect on the wild horse and burro populations must be aggressively considered.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 851

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 851, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 851, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 851, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 851, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 851, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 851, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 851, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 851, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 852

Comment 1

The project will remove more than 11,300 acre feet of water per year, 7000 gallons of water per minute for the lifetime of the proposed use of 40-50 years. This is not acceptable considering the already fragile water sources available to the wildlife species that depend on them for survival.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 852, Comment 2

The Environmental Impact Assessment of this project lists air, water, land, birds, endangered and threatened wildlife, weeds and even humans; basically anything living or naturally existing, as being possibly or definetly effected by this project. As the natural balance of our eco-system is very delicate, and water is such a precious resource to all living things, this information must not be ignored! Further assessment is imperative!
Disposition: Comment acknowledged; does not provide new information

Response
The DEIS discloses the potential impacts from the implementation of the Proposed Action or the alternatives. No changes to the text of the FEIS have been made to address this comment.

Letter 852, Comment 3

Please, you must cancel the plans and choose the no action alternative for this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 853

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below what experts agree is an acceptable number for genetic viability and the potential impact to water and legal grazing area is also unacceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 853, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 853, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 853, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 853, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is unacceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 853, Comment 6

The known patterns of movement of these wild horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 853, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 853, Comment 8

This project fails to fully examine the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 853, Comment 9

I strongly urge that the "No Action" Alternative be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 854

Comment 1

This project encroaches of considerable acreage with 3 HMA's. There will be significant surface disturbance that is not in the wild horse and burros best interest.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 854, Comment 2

Population numbers are already BELOW genetic viability and the potential impact to water and legal grazing area is Unacceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 854, Comment 3

Before decisions can be proposed for this project, one foot and five foot water draw down maps must be created! It is inappropriate and negligent to the mandate of "thriving ecological balance" to formulate a decision without this information.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 854, Comment 4

It is unacceptable considering the already fragile sources available to wild herds to project to remove 11,300 acre of feet of water annually for this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 854, Comment 5

It is indicated that HMA boundary lines are/were flawed by the know patterns of movement of these horses in these 3 areas. The lack of water sources within the boundary lines indicate they were faulty at inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 854, Comment 6

If the project is to be considered new boundary lines should be mitigated to ensure that populations do not get any lower than they are now. Mitigation needs to ensure that the horses do not lose ANY grazing acreage available to them. Equal acreage should be provided in the event of impact.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 854, Comment 7

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 854, Comment 8

The "NO ACTION" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 855

Comment 1

Of particular concern is the DEIS's insufficient analysis of the full impacts mining operations would have on public and private land natural resources,
Disposition: Other (SEE RESPONSE)

Response

The FEIS discloses the potential impacts that would result from the implementation of the Project. Where appropriate, the analysis in the FEIS has been revised to address comments on the DEIS submitted during the public comment period.

Letter 855, Comment 2

its unsatisfactory mitigation plan for lost resources
Disposition: Already addressed in planning documents

Response

CC-113-Project Mitigation and Monitoring

Letter 855, Comment 3

Please include Diamond Cattle Company on the mailing list for all information related to this project
Disposition: Other (SEE RESPONSE)

Response

The contact is included on the mailing list for the Mount Hope Project.

Letter 855, Comment 4

Additionally, please place on the mailing list our attorneys and range consultants. Their contact information is listed on the attached page.
Disposition: Other (SEE RESPONSE)

Response

The contact has been added to the mailing list.

Letter 855, Comment 5

The results of removing water sources from a desert environment will alter the function and health of both upland and riparian ecosystems. As owners of land and water rights within the area of impact, Diamond Cattle Company finds these impacts unacceptable. The DEIS is inadequate in its analysis of the effects of and mitigation for these impacts.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 6

Mitigation measures, as currently stated in the DEIS, are inadequate for handling the level of harm to water resources and water rights caused by the Project. Among the shortcomings of the DEIS is its failure to identify who will be responsible for funding the multitude of proposed mitigation plans. The FEIS should explicitly specify that the Project proponent will be responsible for the burden of all mitigation costs and retributive actions to restore water flow where water sources are impacted. The FEIS should further identify the Project proponent as the sole entity responsible for funding each aspect of mitigation procedures, including the design, permitting, installation, maintenance, and (if necessary) removal of range improvements until conditions have returned to pre-Project status. The FEIS should clearly state that bonding funds can be used for mitigation.
Disposition: Other (SEE RESPONSE)

Response

The mitigation measures under Section 3.2.3 of the FEIS have been revised to address various comments received regarding the DEIS. EML would be responsible for the implementation of any required mitigation, which would be a condition of any approval from the BLM and documented in a Record of Decision.

Letter 855, Comment 7

Additionally, mitigation measures do not include mechanisms that would allow or require them to be implemented in a timely manner. The time lapse between when a mitigation trigger is stimulated and when the mitigation plan is enacted could result in the permanent loss of riparian ecosystems and wildlife habitat. Delays in mitigation implementation could also result in the loss of entire seasons, possibly even years, of grazing use on a pasture. Likewise, many mitigation triggers would not require mitigation to be implemented until the water source was entirely dried up and/or vegetation changes had occurred.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 855, Comment 8

Vegetation change is a gradual response to water loss which occurs over a span of many years. Basing mitigation triggers on vegetation change invites delayed action and irresponsible resource management.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 9

A reduction or loss of water sources available for livestock use will substantially impact the ability of Diamond Cattle Company to utilize their grazing allotment as directed by the BLM. The DEIS fails to adequately analyze the impacts of
Disposition: Comment acknowledged; does not provide new information

Response

CC-031-Impacts to Surface Water Quantity

Letter 855, Comment 10

or provide mitigation for that reduction in livestock water.
Disposition: Other (SEE RESPONSE)

Response

Alternative water developments would be provided, where appropriate, for livestock and wild horses as stated in Appendix D.

Letter 855, Comment 11

Any reduction in distribution or quantity of water will result in impacts to management costs, livestock health and performance, and the ability to meet BLM grazing objectives. Distance to water, changes in utilization patterns and grazing distribution, changes in forage production due to decreased water availability, changes in forage palatability and nutrients, lower weaning weights for calves, and/or reduced body condition scores on livestock are all important factors in livestock management that will be impacted by the Project as it is proposed in the DEIS. The DEIS fails to address these factors. The FEIS must analyze them in detail.
Disposition: Comment acknowledged; does not provide new information

Response
CC-031-Impacts to Surface Water Quantity

Letter 855, Comment 12

the decrease in surface water availability will create added stress on wild horses and wildlife, thereby increasing the level of interaction and competition between domestic and wild species. The DEIS fails to adequately analyze how the needs of wildlife and wild horses will be met.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 855, Comment 13

Much of the mitigation focuses on providing additional water from an unidentified source. If the Project creates a shortage of water in one area, it is likely that other nearby resources will be similarly impacted. The DEIS states that groundwater in Diamond Valley is over-appropriated and in a state of decline. There is no excess water available and further removal of water from Diamond Valley will cause an irreversible and irretrievable commitment of resources. The other impacted water basins have similar conditions. Given the state of over-appropriation, where will the water necessary for the Project come from?
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 14

The DEIS fails to adequately analyze how forage needs for wildlife, wild horses, and livestock will be met when the Project reduces the quantity of available water.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 15

Currently, the most restrictive factor governing forage utilization is distance to drinking water. The DEIS does not analyze distance to water or its impact on forage availability.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 16

Furthermore, the DEIS is inadequate in its analysis of impacts that reduce available drinking water. As drinking water becomes less available, distance between water sources increases. This creates additional stress on forage that is within a reasonable distance of drinking water. The concentration of grazing animals around water sources reduces the usability of each pasture for livestock grazing and reduces the habitat value for wild horses and wildlife.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 17

Loss of forage due to restricted access to water is an indirect impact of the Project. The DEIS also identifies a direct impact to Diamond Cattle Company in the loss of 781 AUMs to the fenced portion of the Project. As with the indirect impacts, the DEIS fails to describe compensation for this hardship or identify how the loss will be offset.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-114- Livestock Mitigation Measures

Letter 855, Comment 18

Because further drawdown of Diamond Valley water would significantly and negatively impact every water user in Diamond Valley, the zone of impact for this project extends to every surface and groundwater user in Diamond Valley. The FEIS must assess impacts to every water user in Diamond Valley.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 855, Comment 19

The FEIS should also specify how the non-fresh water removed during dewatering activities will be put to beneficial use to ensure water resources are not wasted.
Disposition: Analysis modified (SEE RESPONSE)

Response

The water removed from pit dewatering would be fresh water and the text in Section 2.1.2.2 of the EIS has been revised to make this clear.

Letter 855, Comment 20

The FEIS must account for and consider the use and impact of all water used in the Project. Specifically, the FEIS should clarify how all water detained for the Project will be used and identify where the non-fresh water and fresh water will be used.
Disposition: Already addressed in planning documents

Response

The Plan of Operations states where fresh water would be sourced (and the EIS has used a computer model to assess the impacts of this water extraction). As described in the EIS (Section 2.1.2) the sources of non-fresh water are recycled water from the TSF and collected runoff, including runoff from the PAG WRDF and Low Grade Ore stockpile. No change has been made to the EIS in response to this comment.

Letter 855, Comment 21

The FEIS should identify the amount of water required for domestic consumption and stock water
Disposition: Comment acknowledged; does not provide new information

Response

The EIS evaluates potential impacts to existing water rights, including those for domestic and stock water uses. The existing water rights are included in the model and assumed to be pumped as part of the No Action and Cumulative Action, and these are included in the pumping amounts shown in Table 3.2-5. The duty of water rights that would potentially be affected by the proposed project are identified in Table 3.2-6c. Domestic use of groundwater less than 1800 gallons per day does not require a permit. Although these uses are insignificant in the context of other consumptive uses and the evaluation of potential impacts, one domestic well is within the area of the maximum ten-foot drawdown contour, as described in the EIS. No changes to the text of the EIS have been made to address this comment.

Letter 855, Comment 22

it should then specify how the Project will avoid impacting those minimum reservations
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 855, Comment 23

The FEIS should describe what level of impacts to the reserved water sources will be acceptable
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 855, Comment 24

how EML's activities will be curtailed if there is a negative effect on a reserved water source, and what mitigation measures will be required of EML if reserved water sources are impacted
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 855, Comment 25

The FEIS should consider the effect of PWR 107 and address the impacts to minimum stream reservation requirements.
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 855, Comment 26

The FEIS should specify how the study period ranked compared to the historic average in terms of climate and precipitation. Specifically, the FEIS should specify whether the timeframe "between 2005 and 2007" consisted of representative/average years or anomalies
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-004-Baseline Data Adequacy

Letter 855, Comment 27

The FEIS should identify the seasons/months of data collection. It is crucial that the FEIS state clearly when and how often sampling was conducted at each site
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-004-Baseline Data Adequacy

Letter 855, Comment 28

The FEIS should summarize the data, describing changes in water flow from season to season. If data was collected only during the dry season (summer/fall) at any site, the FEIS should also clarify this point and take into account differences in water flow levels throughout the year.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-004-Baseline Data Adequacy

Letter 855, Comment 29

Mitigation should likewise consider seasonal water flow patterns and fluctuations. It should not be assumed that replacing water sources in the spring with flow levels requisite for fall will be sufficient for supporting riparian vegetation, wildlife, wild horses, and livestock use.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 30

The FEIS must clarify how season and average climate and precipitation data relate to SRK's water resource information studies
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-004-Baseline Data Adequacy

Letter 855, Comment 31

The FEIS must delineate how these factors will be accounted for when determining landowners' and water right holders' compensation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 855, Comment 32

The FEIS should specify each reason for selecting the ten-foot drawdown contour as an area of significance for assessing impacts to resources
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 855, Comment 33

The FEIS should list all potential impacts to resources outside that drawdown area and rank the level of significance for each.
Disposition: Other (SEE RESPONSE)

Response

The comment is beyond the scope of analysis for this EIS.

Letter 855, Comment 34

If the five-mile radius was selected based on similar parameters in other reputable studies, these studies should be referenced. The FEIS should provide a detailed explanation of why a five-mile radius was selected for spring and seep studies. This explanation should either provide support for the five-mile radius model or include the admission that the chosen radius was insufficient to address all impacts to water resources and omitted many potentially impacted sites.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 855, Comment 35

The FEIS should consider use of a larger radius than five miles or consider and use the model to predict the drawdown, drying up, and otherwise "dewatering" of the aquifer
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 855, Comment 36

The FEIS should clearly state whether groundwater levels are expected to fully recover
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-012-Recovery of Ground Water Levels

Letter 855, Comment 37

The FEIS should also be clear in stating when the recovery process is expected to begin, how long it will take, and to what extent the waters will be recovered.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-012-Recovery of Ground Water Levels

Letter 855, Comment 38

The FEIS should provide mitigation triggers that reflect actual impacts to large animals. The current mitigation measures are inadequate for identifying harm to wildlife, wild horses, and livestock.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 855, Comment 39

The FEIS should either state, specifically, why the selected mitigation triggers were used or revise these triggers to reflect significant impacts to large animal use.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 40

The FEIS should clearly identify how much water will be piped to each source and how this will affect the total water requirements of the Project.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 41

The FEIS should also identify the source of the piped water.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 42

If water rights are required, the FEIS should identify how EML will obtain these rights.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 43

Additionally, the FEIS should specify the predicted/acceptable length of time allowable between the time mitigation is triggered and when the mitigation plan must be in operation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 44

The FEIS should correct Table 3.2-9 to ensure that under mitigation all water sources retain their former function and usability. If this table is not corrected, the FEIS should clearly state the reason for limiting use to large game and describe the effects of limiting water sources in this way
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 45

Additionally, the FEIS should report the status of water rights of these springs and the impacts of restricting livestock use on those water rights.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 46

If the SRK (2008a) studies are used, the FEIS should consider whether this is adequate to determine "historic yield."
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-004-Baseline Data Adequacy

Letter 855, Comment 47

The FEIS should clarify that mitigation must restore water flow to impacted streams and springs
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 48

If a well and pump are installed and unable to restore sufficient water flow, the FEIS should require that additional mitigation be implemented until water is successfully restored to historic levels
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 49

The FEIS should also identify the party responsible for maintaining range improvements beyond the scope of the Project
Disposition: Comment acknowledged; does not provide new information

Response
CC-030-Range Improvements

Letter 855, Comment 50

The FEIS should state that the project proponent will be responsible for all costs associated with mitigation (of this impact and others). The FEIS should detail that EML will pay all design, permitting, installation, maintenance, and removal costs. These costs should be eligible to be paid out of bond funds should EML fail to pay for them otherwise.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 51

The FEIS should provide more clarity for this mitigation that includes the following: 1) a definition for "potentially affected water supplies,"
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 855, Comment 52

a description of how the "financial guarantee" will be posted
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 855, Comment 53

the means by which financial compensation will be awarded
Disposition: Comment acknowledged; does not provide new information

Response
CC-072-Mitigation Impacts to Water Users

Letter 855, Comment 54

the degree to which financial compensation will be awarded
Disposition: Comment acknowledged; does not provide new information

Response
CC-072-Mitigation Impacts to Water Users

Letter 855, Comment 55

The FEIS should specify, for instance, if the financial guarantee will be sufficient to cover failed attempts to replace water flow until a dependable method of water restoration is found.
Disposition: Comment acknowledged; does not provide new information

Response
CC-072-Mitigation Impacts to Water Users

Letter 855, Comment 56

The FEIS should address all long-term impacts to water sources and all indirect impacts related to the loss of water sources
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Letter 855, Comment 57

The FEIS should require mitigation measures and/or alternate proposed actions that do not result in the total elimination of water sources.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 58

The FEIS should identify both how effects to areas outside the ten-foot drawdown contour
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 855, Comment 59

how owners of unregistered domestic wells will be compensated
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 60

Owners of water rights should be compensated for any loss created by this project.
Disposition: Comment acknowledged; does not provide new information

Response
CC-072-Mitigation Impacts to Water Users

Letter 855, Comment 61

The FEIS should consider soil erodibility a significant impact and fully analyze the potential detriment to terrestrial and aquatic habitat as a result of soil erosion
Disposition: Other (SEE RESPONSE)

Response
Section 3.8.3.1 of the EIS includes two significance criteria regarding soil erosion. Section 3.8.3.3 of the EIS analyzes potential impacts from erosion and compaction. No change has been made in the EIS in response to this comment.

Letter 855, Comment 62

The FEIS should describe how increased soil erodibility will impact each of the 17 rangeland health indicators. Use of the rangeland health indicators is described in Interpreting Indicators of Rangeland Health Version 4 (Pellant et al., 2005).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 63

The FEIS should also delineate mitigation for increased soil erodibility and fissure development. Mitigation should include compensation for lost forage, habitat, and drinking water sources for wildlife, wild horses, and livestock.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 64

Mitigation should also consider the loss of soils and the impact to aquatic habitat.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impats to Phreatophytes

Letter 855, Comment 65

It should be noted that a substantial omission of the DEIS is that it does not cite Interpreting Indicators of Rangeland Health Version 4. All rangeland aspects discussed in the FEIS should be analyzed based on this interagency technical document
Disposition: Other (SEE RESPONSE)

Response
CC-115-Baseline Conditions Used for Analysis

Letter 855, Comment 66

The impacts to each of the 17 indicators of ecological integrity prescribed by the reference should be analyzed for the changes predicted to occur with each alternative.
Disposition: Other (SEE RESPONSE)

Response
CC-115-Baseline Conditions Used for Analysis

Letter 855, Comment 67

The DEIS includes the objective to "increase AUMs available to wildlife by 5,601 AUMs and to improve 34,939 acres of big game habitat to good condition" (p. 4-38, PDF 797, ¶1). Roberts Mountain Allotment alone is anticipated to "provide habitat to support 2,450 AUMs of big game use" according to Table 4.3-1 (p. 4-34, PDF 793). However, the DEIS fails to provide any historical basis for these objectives. The DEIS also fails to specify how these objectives pertain to the Mount Hope Project.
The FEIS should analyze present big game habitat and historical use and then provide quantified support for the proposed increase in big game habitat.
Disposition: Already addressed in planning documents

Response
CC-123-Analysis of Big Game and Livestock Habitat

Letter 855, Comment 68

The FEIS should clearly define "good condition" as it relates to big game habitat
Disposition: Other (SEE RESPONSE)

Response
The terms "good condition" and "excellent condition" utilized in Section 4.3.4 of the EIS are identified in the Shoshone-Eureka, Egan, and Elko Rangeland Program Summaries. No change has been made in the EIS in response to this comment.

Letter 855, Comment 69

The FEIS should also report an inventory of the current range conditions.
Disposition: Already addressed in planning documents

Response
CC-123-Analysis of Big Game and Livestock Habitat

Letter 855, Comment 70

The FEIS should provide sampling data and analysis to support these conditions and objectives.
Disposition: Already addressed in planning documents

Response
CC-123-Analysis of Big Game and Livestock Habitat

Letter 855, Comment 71

The FEIS should also clearly define what constitutes both "good" and "excellent" big game habitat conditions
Disposition: Already addressed in planning documents

Response

CC-123-Analysis of Big Game and Livestock Habitat

Letter 855, Comment 72

In addition, the FEIS should provide an inventory of the current condition of big game habitat
Disposition: Comment acknowledged; does not provide new information

Response

The BLM utilized the best available data for big game habitat in Sections 3.15.2.2, 3.23.2.2, and 4.3.4.1 in the EIS. No change has been made in the EIS in response to this comment.

Letter 855, Comment 73

The FEIS should include an analysis of how each of the indicators of rangeland health would be impacted by this shift in vegetation type. Use of the rangeland health indicators is described in Interpreting Indicators of Rangeland Health Version 4 (Pellant et al., 2005).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 74

The FEIS should include descriptions of how the salt desert scrub ecosite responds to water decreases. Specifically, the FEIS should address the predicted changes in vegetation (production, species composition, functional and structural groups, plant mortality and decadence, and litter amount),
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 75

the likelihood of erosion (wind and water)
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 76

the risk of compaction
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 77

the changes in invasive species dynamics
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 78

the reproductive capability of perennial plants
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 79

The FEIS should also detail the impacts of these predicted changes on wildlife habitat
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 80

livestock grazing
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 81

recreational uses of the site
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 82

The DEIS includes three references to the BLM Key Management Areas (KMAs) and each reference is specific to the discussion of wild horses (p. ES-32, PDF 56; p. 3-415, PDF 531; and p. C-8, PDF 963). The failure of the DEIS to address impacts to KMAs under other pertinent sections—Vegetation Resources; Noxious Weeds, Invasive and Nonnative Species; Wetland and Riparian Zones; Livestock Grazing and Production; and Land Use—is a significant exclusion and elicits questions as to what other important factors were omitted. KMAs are important aspects of the rangeland monitoring process. They provide valuable long- and short-term data to track rangeland health, livestock, wildlife, wild horse utilization, noxious and invasive weed impacts, and other land use patterns.
The FEIS should acknowledge that one KMA will be fenced within the Project Area and two will be directly impacted by the well field. The FEIS should address the full impacts to these KMAs and the direct and indirect consequences of affecting these valuable monitoring sites. These acknowledgements should be made in each of the above-mentioned sections and addressed as they apply to each section.
Disposition: Already addressed in planning documents

Response

CC-086-Impacts to Key Management Areas

Letter 855, Comment 83

The DEIS states "EML would avoid the BLM's Key Management Areas for vegetation monitoring established near Mount Hope and in Kobeh Valley" (p. 3-415, PDF 531, ¶7; p. C-8, PDF 963, ¶1). However, two KMAs are located within the well field portion of the Project Area and one KMA is within the fenced portion of the Project Area.
The FEIS should acknowledge that the Mount Hope Project will impact KMAs and it should address, in detail, how these impacts will affect vegetation monitoring, data collection, and management practices.
Disposition: Already addressed in planning documents

Response

CC-086-Impacts to Key Management Areas

Letter 855, Comment 84

The FEIS should provide a full analysis of the impact of a shift from riparian vegetation to upland vegetation on wildlife, wildlife habitat
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 85

wild horse grazing, wild horse behavior
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 86

livestock grazing, and livestock utilization patterns
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 87

Within each respective section, the FEIS should thoroughly address how the drawdown, and the long-term/permanent loss of water sources and riparian areas, will affect each pertinent resource—soil resources (Section 3.8),
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 88

vegetation resources (Section 3.9)
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020- Impacts to Phreatophytes

Letter 855, Comment 89

noxious weeds, invasive and nonnative species (Section 3.10
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 90

wetlands and riparian zones (Section 3.11)
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 91

livestock grazing and production (Section 3.12
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 92

wild horses (Section 3.13
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 93

land use (Section 3.14)
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 94

The FEIS should clearly state what information will be evaluated by the BLM to determine mitigation requirements, as well as who will collect the information and what methods will be used for data collection. In addition, the FEIS should identify the parameters the BLM will use for determining when mitigation is required.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 855, Comment 95

the FEIS should include a timescale for mitigation and require EML to submit a successful mitigation plan. By failing to pass a mitigation plan, the BLM should not absolve EML's duty to submit a plan. EML should be required to continue submissions until a reasonable plan is accepted. A successful plan should be implemented within one month of failing to meet significance criteria.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 855, Comment 96

The FEIS should clarify the four inconsistencies regarding acreage with potential for surface disturbance and identify how RFFA acreages would be impacted
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-083-Project-Related Acreage Disturbance

Letter 855, Comment 97

The FEIS should also clearly identify each disturbance that would comprise the total 8,318 acres of surface disturbed land and the number of acres impacted by each disturbance, i.e., the number of acres disturbed by the well field, roads, powerlines, and other utilities.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-083-Project-Related Acreage Disturbance

Letter 855, Comment 98

Furthermore, the FEIS should be clear in describing the extent to which acreage will be disturbed and how these acres will be reclaimed.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-083-Project-Related Acreage Disturbance

Letter 855, Comment 99

The FEIS should identify how the 14,796 acres outside the fenced area will be utilized and how they will be impacted, namely if fences, pipelines, roads, or other structures will divide, disturb, or impact the land.
Disposition: Already addressed in planning documents

Response

CC-036-Fences and Berms

Letter 855, Comment 100

If any surface disturbance will occur outside the fenced portion, the FEIS should be clear in describing how many acres will be disturbed, how they will be disturbed, and what will be the reclamation measures.
Disposition: Already addressed in planning documents

Response

CC-087-Surface Disturbance Associated with Fencing

Letter 855, Comment 101

Restricting access by fencing 14,204 acres is a disturbance that impacts wildlife, wild horses, and livestock; therefore, the FEIS needs to analyze the full impacts to acres within the fenced area which do not have anticipated surface disturbance associated with them
Disposition: Already addressed in planning documents

Response

CC-087-Surface Disturbance Associated with Fencing

Letter 855, Comment 102

The FEIS should specify how changes to the phreatophytic community will impact wildlife, wild horses, and livestock.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 103

In addition, the FEIS should describe mitigation for such changes.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impats to Phreatophytes

Letter 855, Comment 104

The FEIS should include mitigation for both preventative and corrective measures regarding weed control. Mitigation should include a plan to mitigate for failed reclamation or noxious/invasive species establishment despite reclamation efforts.
Disposition: Already addressed in planning documents

Response

CC-084-Weed Control Mitigation

Letter 855, Comment 105

The FEIS should describe, in detail, how long weed control will continue beyond the scope of the project.
Disposition: Already addressed in planning documents

Response

CC-084-Weed Control Mitigation

Letter 855, Comment 106

The FEIS should require monitoring for and control of weeds to continue until the reclamation phase is complete or beyond.
Disposition: Already addressed in planning documents

Response

CC-084-Weed Control Mitigation

Letter 855, Comment 107

The FEIS should require mitigation that is both preventative and responsive to affected upland areas in addition to riparian regions. Mitigation should include weed control and monitoring along pipelines, transmission lines, roads, and the perimeter of the Project Area.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-085-Preventive Weed Control Mitigation

Letter 855, Comment 108

The FEIS should also include plans for identification and control of noxious weeds
Disposition: Already addressed in planning documents

Response

CC-084-Weed Control Mitigation

Letter 855, Comment 109

The FEIS should identify the impacts associated with increased invasive species density and distribution
Disposition: Other (SEE RESPONSE)

Response

Section 3.10.3.3 of the EIS discloses impacts associated with increased species density and distribution.

Letter 855, Comment 110

The FEIS should likewise identify mitigation plans for invasive species which are not classified as noxious, but are damaging to the ecosystem (e.g., cheatgrass, halogeton, annual bromes, invasive thistles, and similar species).
Disposition: Other (SEE RESPONSE)

Response

As described in Section 3.10.3.3 in the EIS, revegetation would reduce the potential of introduction and spread of invasive species.

Letter 855, Comment 111

The FEIS should suggest alternate seed mixes better suited to the region and ecosystem variation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 112

The FEIS should identify the criteria the BLM will utilize in selecting a seed mix to be used for reclamation efforts.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 113

The FEIS should also clearly define the conditions under which a salt scrub mix would be selected for reseeding
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 114

Further, the FEIS should describe, in detail, the effect this change in vegetation would have on ecosystem function, wildlife habitat and foraging, wild horse use, and livestock use.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 115

The FEIS should clarify that initial reclamation attempts must be successful otherwise subsequent attempts should be adjusted until success is achieved. The FEIS should clarify that the mere attempt to reclaim land is inadequate; reclamation must successfully establish healthy, perennial vegetation before EML's responsibilities are completed.
Disposition: Other (SEE RESPONSE)

Response

EML would be required to conduct successful reclamation, as assessed by the BLM, per 43 CFR 3809 regulations. No changes to the FEIS have been made to address this comment.

Letter 855, Comment 116

The FEIS should clarify that wetlands outside the Project Area will be impacted by the drawdown
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 117

The area impacted will be much larger than indicated by the ten-foot contour, and the study region should be expanded to include all wetlands within a one-foot drawdown area. The FEIS should identify all wetlands within a one-foot drawdown contour.
Disposition: Comment acknowledged; does not provide new information

Response

CC-096-Ten-Foot Isopleth

Letter 855, Comment 118

The FEIS should further identify full impacts to each wetland within the one-foot contour, including the loss of surface and subsurface moisture, changes in vegetation, and changes in ecosystem function.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 855, Comment 119

The FEIS should state if the drawdown is expected to recover or if the impacts are permanent
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 120

and it should outline mitigation for both situations
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 121

The FEIS should also describe how the BLM will determine which seed mix to use to mitigate lost vegetation and provide a description of the species in each seed mix.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 122

The FEIS should specify harm to all riparian and wetland communities that could potentially be impacted by the drawdown. The ten-foot drawdown contour should be a minimum analysis. Studies should be extended to include impacts to all areas within a one-foot drawdown contour and continue to the headwater of each impacted stream.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 855, Comment 123

The FEIS should include mitigation for the entire impacted area, rather than limiting mitigation to the ten-foot contour area.
Disposition: Comment acknowledged; does not provide new information

Response

CC-096-Ten-Foot Isopleth

Letter 855, Comment 124

The FEIS should rectify the exclusion of riparian and wetland areas from the list of components eligible for monitoring. The components list should add monitoring for all wetlands and riparian areas within a one-foot drawdown contour
Disposition: Comment acknowledged; does not provide new information

Response
CC-096-Ten-Foot Isopleth

Letter 855, Comment 125

The monitoring plan should also specify that monitoring will be proactive (begin prior to the commencement of the Project) and continue throughout the Project life and reclamation period
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 126

The FEIS should describe in detail when, where, and how monitoring will be conducted on each component.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 855, Comment 127

The FEIS should state with which "state permits and other plans" monitoring will comply.
Disposition: Other (SEE RESPONSE)

Response
Section 1.6 of the EIS outlines the permits that would be required for the Project. Specific monitoring provisions under each of those permits would be established and enforced by the respective agencies.

Letter 855, Comment 128

The FEIS should assess, in detail, how the loss of riparian vegetation will impact infiltration, runoff, soil erosion, and ecosystem function.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 129

Mitigation should address each of these impacts.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 855, Comment 130

Table 4.3-1 within the DEIS refers to utilization of riparian habitat in Roberts Mountain Allotment; it includes an objective that states that "utilization of riparian habitat to be improved would not exceed 50 percent on key species" (p. 4-34, PDF 794). Utilization is a subjective form of data collection, which must be conducted in a consistent, repeatable manner on representative locations to be reliable.

The FEIS should specify how sampling locations will be selected, require that sampling be conducted at the same locations in the future, and identify the specific procedure employed for utilization studies. Furthermore, the FEIS should specify which key species will be measured for utilization at each location.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-090-Analysis in Table 4.3-1

Letter 855, Comment 131

Table 4.3-1 (p. 4-34, PDF 793) provides the short-term objective to "improve 15 miles of riparian or aquatic habitat to good condition.." However, the DEIS fails to state how the riparian areas will be improved. The DEIS also fails to define "good condition" as it relates to riparian and aquatic habitat.
The FEIS should specify the techniques that will be employed to bring about this improvement. If acreage is to be fenced for improvement by excluding wild horse and livestock grazing, the FEIS should be clear in its analysis of how such improvements will

impact the habitat, distribution, and grazing of wildlife, wild horses, and livestock. The FEIS should clearly define "good condition" as it pertains to riparian and aquatic habitat. The FEIS should also provide an inventory of the current condition of the riparian or aquatic habitat.
The FEIS should clearly define condition scores for each category for which they are used, describe how the scores were determined, and explain how the scores will be used.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-090-Analysis in Table 4.3-1

Letter 855, Comment 132

The FEIS should identify and analyze all impacts to livestock, both direct (loss of 781 AUMs) and indirect (impacts of drawdown).
Disposition: Already addressed in planning documents

Response
CC-121-Lifestock Impacts

Letter 855, Comment 133

The FEIS should include the provision that riparian vegetation be reestablished within the same grazing allotment from which it was disturbed.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-102-Riparian Vegetation Reclamation

Letter 855, Comment 134

It should also require that reclamation efforts be continued until riparian vegetation is successfully reestablished.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-102-Riparian Vegetation Reclamation

Letter 855, Comment 135

The FEIS should detail the proposed pipeline carefully. Specific elements that should be addressed include the following: 1) the number of acres to receive supplemental water for riparian vegetation support
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-059-Impacts of Mitigation Implementation

Letter 855, Comment 136

an analysis of the impacts of the pipeline in conjunction with the benefits, 3) a clarification of the lifespan of the pipeline and the state of the riparian area if/when pipeline maintenance is discontinued, and 4) a description of how the riparian system will be impacted if the pipeline is unable to provide adequate water or if water supply is reduced or eliminated.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-059-Impacts of Mitigation Implementation

Letter 855, Comment 137

Furthermore, the FEIS should carefully detail subsequent action required if mitigation attempts are unsuccessful in restoring riparian and wetland areas (p. 3-389, PDF 508; p. C-6, PDF 962).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-102-Riparian Vegetation Reclamation

Letter 855, Comment 138

The FEIS should state for whom these improvements are authorized, who will pay for them, and where they will be located
Disposition: Comment acknowledged; does not provide new information

Response
CC-030-Range Improvements

Letter 855, Comment 139

The FEIS should also state who paid for past range improvements, who retains ownership, and how they will be reimbursed if the improvements are removed, altered, or rendered useless by groundwater drawdown or other mine-related impacts.
Disposition: Comment acknowledged; does not provide new information

Response
CC-030-Range Improvements

Letter 855, Comment 140

The FEIS should correctly report impacts to range improvements resulting from the Proposed Action
Disposition: Comment acknowledged; does not provide new information

Response
CC-030-Range Improvements

Letter 855, Comment 141

and those resulting from the Partial Backfill Alternative under the respective section
Disposition: Other (SEE RESPONSE)

Response
The text in Impact 3.14.3.5-1 in the EIS has been revised to read, "Public lands ... the Project. The Partial Backfill Alternative would result in ... ".

Letter 855, Comment 142

The FEIS should clearly state whether there will be impacts to range improvements under each alternative. If impacts are anticipated, the FEIS should identify which range improvements would be impacted, how they would be impacted, and how impacts would differ under each alternative.
Disposition: Comment acknowledged; does not provide new information

Response
CC-030-Range Improvements

Letter 855, Comment 143

For each impacted range improvement, the FEIS should identify whom these changes will affect and how they will be mitigated.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-114- Livestock Mitigation Measures

Letter 855, Comment 144

The FEIS should identify the impacts of perimeter fencing, roads, well fields, surface disturbances, and/or drawdown on each range improvement.
Disposition: Comment acknowledged; does not provide new information

Response
CC-030-Range Improvements

Letter 855, Comment 145

The FEIS should provide measurable thresholds for the significance criteria that clearly identify what changes in livestock grazing will be considered significant and detail measurement protocols.
Disposition: Other (SEE RESPONSE)

Response
CC-124- Significant Thresholds for Grazing

Letter 855, Comment 146

The FEIS should also define how impacts to livestock grazing will be measured, namely, whether distance to water, changes in utilization patterns and grazing distribution, changes in forage production due to decreased water availability, changes in forage palatability and nutrients, lower weaning weights for calves, and/or reduced body condition scores on livestock will be determining factors
Disposition: Already addressed in planning documents

Response

CC-121-Lifestock Impacts

Letter 855, Comment 147

In addition, the FEIS should describe mitigation for situations that exceed the significance criteria by defining how livestock owners will be compensated.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-114- Livestock Mitigation Measures

Letter 855, Comment 148

The FEIS should clarify how harassment will be determined "undue" and how changes in livestock grazing patterns will be addressed under "undue harassment."
Disposition: Other (SEE RESPONSE)

Response

CC-124- Significant Thresholds for Grazing

Letter 855, Comment 149

The FEIS should further delineate how livestock owners will be compensated should "undue harassment" occur. Specifically, if livestock cease to use a portion of any pasture due to disturbance,traffic, noise, or other mine-related practices, the FEIS should spell out all mitigation measures and schedules.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-114- Livestock Mitigation Measures

Letter 855, Comment 150

Additionally, the FEIS should analyze how impacts to livestock grazing—including harassment, reduced water availability, and reduced forage availability—will interact and compound over time.
Disposition: Already addressed in planning documents

Response

CC-121-Lifestock Impacts

Letter 855, Comment 151

The FEIS should also define what mitigation will occur for each of the predicted impacts.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-114- Livestock Mitigation Measures

Letter 855, Comment 152

The FEIS should protect the permittees' ability to recover AUMs for all but the 734 acres permanently removed from use by disturbance. The FEIS should state that this acreage will be made available once reclamation efforts are complete. If reclamation is successful in fewer than 30 years, livestock should be allowed to begin grazing the reclaimed land sooner.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-122-Recovery of Temporarily Lost AUMs

Letter 855, Comment 153

The FEIS should detail the steps that will occur to determine if livestock can return to the reclaimed land earlier than 30 years.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-122-Recovery of Temporarily Lost AUMs

Letter 855, Comment 154

The FEIS should include an economic analysis of the loss of these AUMs. The analysis should include the immediate and long-term cost of lost production, the decrease in total ranch value, and a description of how these costs will be mitigated
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-034-AUM Reductions

Letter 855, Comment 155

The FEIS should address the decreased value of each ranch impacted by the mine in terms of aesthetic value, water availability, increased management costs, increased risks, and decreased AUMs.
Disposition: Comment acknowledged; does not provide new information

Response

The EIS discloses potential impacts to water availability (Section 3.2.3), aesthetic values (Section 3.7.3), and decreased AUMs (Section 3.12.3). The comment on increased risk is too vague to allow for a direct response. The BLM does not have sufficient information (and none was provided by the commenters) on individual ranch operations to assess management costs. No changes to the text of the EIS have been made to address this comment.

Letter 855, Comment 156

The FEIS should include an analysis of impacts of the well field and associated disturbances on livestock grazing. The well field and any fences, barriers, restrictive features, pipelines, pits, surface disturbances, and human activity that could disrupt grazing outside the fenced portion of the Project Area should be described and impacts analyzed for each alternative. The FEIS should describe the areas of disturbance in terms of acres and AUMs lost or disturbed, temporarily or permanently.
Disposition: Already addressed in planning documents

Response

CC-121-Lifestock Impacts

Letter 855, Comment 157

The FEIS should clearly detail how livestock could potentially access the pit lake while horses could not. Alternatively, if the pit lake is a viable water source for livestock and/or wild horses, the FEIS should analyze the full impacts of using that pit lake as a drinking water source.
Disposition: Already addressed in planning documents

Response

CC-032-Pit Lake Affects to Animals

Letter 855, Comment 158

The FEIS should further detail whether the impoundments will be fenced or surrounded by a berm.
Disposition: Already addressed in planning documents

Response

CC-036-Fences and Berms

Letter 855, Comment 159

The FEIS should fully analyze available water sources in the pasture containing the pit lake.
If the pit lake is available as a water source and no other water sources are available in that pasture or if other water sources have dried up as a result of the drawdown, the FEIS needs to detail the toxicological risks to livestock, wild horses, and wildlife watering exclusively out of the pit lake.
Disposition: Already addressed in planning documents

Response

CC-032-Pit Lake Affects to Animals

Letter 855, Comment 160

The FEIS should also detail the pit lake's construction to determine if horses and/or livestock could be reasonably expected to use the pit lake as a drinking water source
Disposition: Already addressed in planning documents

Response

CC-036-Fences and Berms

Letter 855, Comment 161

The FEIS should detail any potential drowning hazards due to bank slope, depth of pit, and bank stability should an animal get past the "physical perimeter barricade" and reach the pit lake
Disposition: Already addressed in planning documents

Response

CC-032-Pit Lake Affects to Animals

Letter 855, Comment 162

If the pit lake will not be available as a watering source for livestock or wild horses and/or if the physical barrier will sufficiently remove any chance of livestock or wild horse watering in the pit lake, the FEIS needs to describe the impacts of prohibiting access to that water source.
Disposition: Already addressed in planning documents

Response

CC-032-Pit Lake Affects to Animals

Letter 855, Comment 163

The FEIS should describe alternate water sources and the impact of each project alternative on the quality, quantity, and reliability of each alternate water source. This analysis should include how water availability will impact season of use, length of use, and number of animals occupying the pasture at one time.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 855, Comment 164

The DEIS is unclear in its statement that "livestock grazing is expected to continue at management levels established in the various grazing allotments including the vicinity of the Proposed Action" (p. 4-21, PDF 782, ¶6). Does the term "management levels" refer to the current stocking rates or a level determined after the land use changes are initiated by the project?
The FEIS should define how "management levels" will be determined and outline them by number of AUMs. The FEIS should provide a table of AUMs for each pasture in each impacted allotment to illustrate the change in AUMs before and after operations have begun at the mine. The table should include a prediction of the change in AUMs resulting from lost water sources, changes in grazing distribution, and decreases in grazing use despite feed availability.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 165

Table 4.9-1, Irreversible and Irretrievable Commitment of Resources by the Proposed Action, does not give due explanation regarding impacts to livestock grazing and production; it only mentions the Project will result in the loss of 781 AUMs (p. 4-102, PDF 857). It does not include how long the AUMs will be lost, nor does it mention loss of forage or riparian areas or water sources.
In the FEIS, Table 4.9-1 should reflect that the damage to wild horses and livestock will be nearly equivalent.
Disposition: Already addressed in planning documents

Response

CC-123-Analysis of Big Game and Livestock Habitat

Letter 855, Comment 166

The FEIS should define the term "local" and provide specific direction for mitigation measures to be taken by EML regarding lost AUMs. This mitigation description should specify how EML will compensate permittees for AUMs lost directly as a result of the 14,209 fenced acres and the AUMs lost indirectly due to water becoming unavailable within pastures.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-114- Livestock Mitigation Measures

Letter 855, Comment 167

The FEIS should include mitigation for livestock owners impacted by the loss of water sources as a result of the drawdown. In addition to plans for piping, pumping, or otherwise supplying water, mitigation for depleted water sources should include plans for compensating livestock owners for water stress to livestock when water supplies are inadequate, inconsistent, and/or incapable of being replaced. Mitigation should consider that livestock grazing use is highest within one mile of water on flat ground.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 855, Comment 168

The FEIS should include mitigation for a loss of AUMs resulting from inadequate water sources to support grazing throughout the allotment.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 855, Comment 169

The FEIS should clarify that mitigation for many water sources will preclude livestock use. The FEIS should be clear in its explanation that current mitigation for impacted water sources does not mitigate impacted livestock water sources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 855, Comment 170

The FEIS should include a section detailing mitigation specific to livestock water sources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 855, Comment 171

The FEIS should describe where the BLM will erect and disassemble fencing after the close of the Project.
Disposition: Already addressed in planning documents

Response

CC-036-Fences and Berms

Letter 855, Comment 172

The FEIS should include a map of these fence adjustments.
Disposition: Already addressed in planning documents

Response

CC-036-Fences and Berms

Letter 855, Comment 173

Given the statement (quoted above) concerning the percent of the Roberts Mountain and Whistler Mountain HMAs to be impacted by the Project, the FEIS should acknowledge the reduced wild horse habitat and proportionately reduce the AML in each HMA.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 855, Comment 174

Additionally, the FEIS should require the BLM to annually monitor herd size and maintain populations at or below the AML
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 855, Comment 175

The FEIS should discuss the impacts to resources due to the horses that are presently over AML
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 855, Comment 176

Additionally, it should analyze the added difficulty in maintaining AML with fewer resources available to horses and increased conflict with other users
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 855, Comment 177

The FEIS should clearly state the number of acres within the Project Area that lie within the Roberts Mountain HMA and within Roberts Mountain Allotment. Discrepancies in these numbers should be made accurate in the FEIS
Disposition: Already addressed in planning documents

Response

CC-088-Roberts Mountain HMA and Allotment

Letter 855, Comment 178

The FEIS should also state the exact number of acres to be excluded from Roberts Mountain HMA and Roberts Mountain Allotment as a result of the Project-boundary fence. Without precise acreages, AUMs for livestock and wild horse use cannot be correctly calculated.
Disposition: Already addressed in planning documents

Response

CC-088-Roberts Mountain HMA and Allotment

Letter 855, Comment 179

The FEIS should delineate how the 1,118-acre value was determined and what comprises it. The FEIS should clearly describe how and which acres will be "affected" and to what extent they will be impacted.
Disposition: Other (SEE RESPONSE)

Response

Section 2.1.7.6 of the EIS has been revised to include the total number of acres within the fenced area, and the total acreage of Project-related surface disturbance proposed within the fenced area and outside the fenced area. Acreages throughout the EIS have been updated to reflect adjustments to the width of the powerline corridor associated with an updated powerline construction design.

Letter 855, Comment 180

The FEIS should provide an up-to-date population number for wild horses in each HMA
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 855, Comment 181

The FEIS should identify whether EML has the right to provide water from production wells for wildlife and stock use. If EML does not have the right, the FEIS should specify how EML will attain this right
Disposition: Comment acknowledged; does not provide new information

Response
CC-048-Water Mitigation for Wildlife and Horses

Letter 855, Comment 182

The FEIS should explain how increased, localized wild horse utilization will affect livestock grazing and BLM grazing permits.
Disposition: Other (SEE RESPONSE)

Response
The cumulative impact section for livestock grazing and production (Section 4.4.10) discloses potential impacts from wild horse management on the composition and productivity of forage. No change has been made in the EIS in response to this comment.

Letter 855, Comment 183

The FEIS should also describe how utilization levels will be monitored for wild horses.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 855, Comment 184

The FEIS should further delineate which agencies and stakeholders will be involved. Any mitigation for wild horses and wildlife also impacts livestock. The FEIS should clarify that mitigation will be cooperative with lease-holders running livestock on the allotments
Disposition: Comment acknowledged; does not provide new information

Response
The BLM would determine the applicable state and federal agencies and other private stakeholders at the time the mitigation is implemented. No change has been made to the EIS in response to this comment.

Letter 855, Comment 185

The FEIS should define the entity "Mount Hope Project" and describe how this differs from Eureka Moly LLC. The entity "Mount Hope Project" should be provided a differentiating title throughout the DEIS to allow identification of the Project itself versus the entity.
Disposition: Other (SEE RESPONSE)

Response
EML and Mount Hope Project are defined on 1-1 of the DEIS. No changes to the text of the FEIS have been made to address the comment.

Letter 855, Comment 186

The FEIS should identify which water sources will be utilized as alternative water sources for wild horses.
Disposition: Other (SEE RESPONSE)

Response
Attachment 2 in the mitigation appendix (Appendix D) in the EIS includes the water sources identified as part of the Wild Horse and Wildlife Water Source Mitigation Plan. No change has been made in the EIS in response to this comment.

Letter 855, Comment 187

The FEIS should further describe who owns and maintains these water sources and how the past and present use of these water sources will be impacted by transferring maintenance responsibilities to EML.
Disposition: Comment acknowledged; does not provide new information

Response
Section 3.2.2 of the EIS discloses the owners of the existing water rights. Mitigation of water rights is under the jurisdiction of the State Engineer.

Letter 855, Comment 188

The FEIS should detail how EML will obtain rights to use these waters for wild horses.
Disposition: Other (SEE RESPONSE)

Response
Any changes to EML's existing water rights or the acquisition of new water rights would be through an application filed with the NDWR. No changes to the text of the FEIS have been made to address this comment.

Letter 855, Comment 189

The FEIS should analyze alternative mitigation that does not require drilling new wells or creating a new water development. There is no evidence that such water would be available. If water is not available for wild horses it will also not be available for other uses.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 855, Comment 190

The FEIS should address how water will be allocated to the various uses.
Disposition: Other (SEE RESPONSE)

Response

The comment is subject to the jurisdiction of the NDWR and is beyond the scope of analysis of this EIS.

Letter 855, Comment 191

The DEIS discusses management of wild horses outside of the HMAs (Herd Management Areas) (p. 4-9, PDF 772, ¶3). This indicates an expansion of HMAs. This document is not the appropriate place to make such a change.
The FEIS should remove wording that implies an expansion of HMAs.
Disposition: Other (SEE RESPONSE)

Response

The cumulative impact section includes a discussion of wild horse management within the cumulative effects analysis area. The EIS does not state that an expansion of the HMA would occur as a result of the Proposed Action. No change to the EIS has been made in repsonse to this comment.

Letter 855, Comment 192

The DEIS states that EML would "reestablish structures that would be altered or removed, as appropriate" (p. C-2, PDF 957, ¶4). The DEIS is unclear concerning which structures will be altered or removed and how they will be reestablished.
The FEIS should identify which structures would be impacted and describe how they will be reconstructed.
Disposition: Other (SEE RESPONSE)

Response

Section 3.14.3 of the EIS outlines which structures would be affected by the Project.

Letter 856

Comment 1

Mining is at the beginning of the supply chain for virtually everything we use on a daily basis. Mount Hope will be an important contributor to that supply chain by providing high paying, family wage jobs in a foundational industry for over two decades. Mining has an indirect job multiplier that is twice the national average. It will provide jobs in support industries, local stores and restaurants and also provide jobs and the raw materials for people working in American industries that make the products society requires.

And, as the DEIS indicates, General Moly will do this in the most environmentally responsible manner, complying with all environmental laws and regulations designed to ensure clean air, clean water and proper reclamation. Overall, the positive environmental and economic benefits of this mine will be extensive not just in Nevada, but across the country.

The Mount Hope Project truly is a win-win. NWMA requests that you move forward with the Proposed Action and issue a final EIS and Record of Decision allowing the mine to be built.

Thank you for your consideration of our comments.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 857

Comment 1

This EIS, and the proposed action it represents, makes me ashamed to wear the badge.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 858

Comment 1

Great Basin Resource Watch (GBRW) appreciates the opportunity to comment on this very significant project, and the extension of the original comments period. Although helpful to the public in general, it is clear to GBRW that 120 days as our earlier recommendation for public review was needed. This is especially true since the DEIS is lacking in detail necessary to fully evaluate many aspects of the project, thus additional time is necessary to obtain and review supporting document. The scope and public interest in this project has made it clear that even the extension was not sufficient. GBRW has been working on reviewing the draft Environmental Impact Statement (DEIS) for the Mount Hope Molybdenum Mine, and as much as possible the enormous volume of supporting documents. The release of the document in early December eroded the time for review significantly, effectively shearing off 2-3 weeks when people typically have plans with friends and family. Why could have the release waited early January?
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 858, Comment 2

In our comments here we will be focusing on areas that appear not to have relieved as much attention by other commenter's to our knowledge. In particular, the potential for water quality impacts through acid drainage and other metal leaching mechanisms. In addition we will comment on water quantity impacts, air quality, and economic factors of concern.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 858, Comment 3

Clearly the economic affects of the project will be very great in the region. The mining company should provide to the public estimates of how molybdenum prices will impact the nature of the mining operation. Currently, molybdenum is hovering at around $14/lb, but what are production costs? There needs to be an analysis of what market conditions would result in a partial or total temporary shutdown of operations. If molybdenum prices swing as significantly as in the past at some points in the future Eureka Moly LLC (EML) may cease mining at least on a temporary basis until the market recovers, if it does. This is particularly important for a relative low-grade ore deposit as exists for Mt. Hope. Certainly, the deposit is large; however, lower grade deposits will have greater production costs for the amount of salable product. The people and local economy will be affected by these changes in operations. The DEIS tends to present mining operation changes as occurring in a smooth manner, and hopefully if the project does go forward this will be the case. However, it is important to prepare for a more volatile production schedule. If there is a sense of the bottom line production cost, then if market prices drop the region (city and county government) can better anticipate possible ceases in operations and the associated impacts.
Disposition: Other (SEE RESPONSE)

Response

As required under 43 CFR 3809, a bond will be in place to ensure that reclamation is funded in the event of an unforeseen premature shutdown. On a regional basis the northern Nevada economy is primarily based on mining. Local governements have become adept at evaluating revenues and costs based on the cycles of commodity prices, and plan accordingly.

As part of the applicant committed practises outlined in Section 2.1.14 of the EIS, EML has committed to keeping Eureka County informed on the activities at the mining operation.

No changes to the text of the FEIS has been made to address this comment.

Letter 858, Comment 4

Key to prediction of future water quality at mine site is judicious and sufficient sampling of the various rock types and alterations. The bare minimum for characterization as cited in an EPA review1 is 1 sample per million tons of rock, which EML approximately achieves. According to the DEIS, 1,750 million tons of waste rock is anticipated, so the minimum would be on the order of 1,750 samples, and in total EML appears to have based waste rock characterization on 1,844 samples from 1,545 "historic" pulp samples, 250 historic core samples, and 48 recent core samples (It was not clear to GBRW from the report whether kinetic testing used samples from the 1,844 or additional samples).2 The EPA review article cites other expert sampling opinions; 1 for every 20,000 tons (Gene Farmer, US Forest Service), 1, for every 40,000 tons (British Columbia AMD Task Force. Following these opinions EML would have needed to collect from 40,000 to 70,000 samples, roughly 20 to 40 times as many as were collected. In a more recent review of predicting water quality at mine sites, Maest and Kuipers recommend the following: (Table 1). Using this prescription adapted from Price and Errington 1994 ,yields a similar sampling rate as indicated from Farmer and the BC AMD task force.
Disposition: Comment acknowledged; does not provide new information

Response

The BLM recognizes that sample selection is a fundamental step in the waste rock characterization program and requires careful consideration. Guidelines applied to determine sampling for Mt Hope include those provided by the USEPA (1994) and by the British Columbia AMD Task Force (BCATF, 1989). The recommendations provided by Maest and Kuipers (2005) are based on the guidelines provided by Price and Errington (1994) which are directly comparable to the British Columbia method. However, professional judgment and sound geological knowledge of a deposit (as opposed to a strict numerical adherence to guidelines) are even more significant factors in the number and types of samples selected, as recognized in the 2009 GARD Guide Section 4.3.2. The GARD Guide is the most widely recognized guidance on geochemical characterization.

As stated in the GARD Guide, samples should represent the waste rock material types (influenced by factors such as grain size, mineralogy, texture, lithology, hydrothermal and supergene alteration) that will be exposed during mining and the number of samples must be sufficient to adequately represent the variability within each material type. Material types that comprise less than five percent of the waste rock typically require fewer samples since they are less likely to have a considerable influence on the geochemical nature of the dump facility.

The British Columbia method for determining the minimum number of samples uses a curve to define sample number as a function of the mass of each geologic unit that will be mined (BCATF, 1989). Therefore, as the waste volume increases, the number of samples decreases. According to this method, the recommended minimum number of samples should be 25 for a 1 million ton geologic unit and the maximum number of samples recommended by the BCATF is 500. Therefore, the assertion that EML would need to collect from 40,000 to 70,000 samples is obviously in error and not in agreement with the BCATF approach. Furthermore, as noted by the BCATF, the curve for determining the minimum number of samples is 'empirical and preliminary in nature and should be only used as a guideline'.

The number of samples that that were included in the Mount Hope waste rock characterization program are summarized in the Table below for each of the main rock types along with the minimum number of samples recommended using the British Columbia method. As shown in the Table, there is a sufficient quantity of samples for each rock type to meet the BCATF guidelines, with the exception of the Intermediate Phase Quartz Porphyry (Tqpa). However, this material type comprises a small percentage of the waste rock (i.e., 3 percent) and shows little variability in the static and kinetic tests and therefore, fewer samples for this material type adequately represent the material for purposes of geochemical characterization.

Table: Mount Hope Waste Rock Characterization Sample Frequency
Rock Type Percent of Total Waste Waste Rock Tonnage (Mt) Number of Waste Rock Samples Minimum Number of Samples (BCATF)
Historic Core Recent Core Historic Pulps Total
Intermediate Phase Quartz Porphyry (Tqpa) 3 53 12 0 74 86 160
Early Phase Quartz Porphyry (Tqp) 22 393 66 8 420 494 400
Rhyolite Breccia (Trb) and Rhyolite Tuff/Flow (Tmr/Tfr) 37 650 53 20 537 610 500
Vinini Sediments (Ov) 37 654 67 12 495 574 500
Totals 100 1750 202 48 1,546 1764 1560

It should be remembered that waste rock characterization is an iterative process and representativeness of the data set needs to be continually assessed during the mine life. The main objective of the waste rock characterization program was to develop site specific criteria that can be used to identify and segregate potentially ARD generating materials (PAG) from non-potentially ARD generating materials (non-PAG) in order to support mine engineering and planning at an early stage of the project. Waste rock characterization activities would be continued during operations to validate the initial predictions and adjust the proposed waste rock classification system and management as required. During operations, total sulfur and carbon would be determined by LECO analysis to allow segregation and proper placement of the waste rock material in the PAG or non-PAG facilities. Therefore, the current characterization

program adequately addressed the potential for waste rock from the Mount Hope deposit to generate acid and leach constituents and additional sample collection is not warranted.

Letter 858, Comment 5

In view of these reviews and our opinion of the potential for acid drainage and poor water quality that has occurred at other mines in Nevada GBRW does not see the sampling rate for the Mt. Hope Project (Project) to be sufficient. The most glaring example of this is that paucity of potential pit wall samples that were used for the pit lake water quality analysis, "There were little sampling data from some of the pit wall areas because of the relatively cylindrical nature of the orebody," (DEIS, pg. 3-197). Regardless of whether the approach to the pit lake model is justified, this statement clearly indicates how incompletely the sampling was done. EML was relying on samples that were taken 30-40 years earlier, where the mine plan was likely to have been much different that the current plan. These "pulp" samples appear to have been largely from the periphery of the ore body as part of those early explorations when resource evaluation was the primary goal. GBRW recognizes that these samples are useful; however, we are skeptical that they and the additional recent samples have been sufficient to fully understand long -term water quality at the site.
Disposition: Comment acknowledged; does not provide new information

Response

CC-101-Waste Rock Characterization Adequacy

Letter 858, Comment 6

In addition to the overall number of samples is the matter of sufficient samplings of rock types and alterations. In Table 2 below GBRW has compared the sampling for the primary alterations of rock types (based on Table 3.3-3 of the DEIS, pg. 3-195) deduced from Table 4.1 of Waste Rock and Pit Wall Rock Characterization Report, 2008 with recommended sampling for the same tonnage based on Table 1 above. Not only is the overall sampling below most recommendations, but under each rock type/primary alteration, the number of samples, with one exception is typically well below recommendations. GBRW does not expect that EML would match the "generic" sampling rate that we have discussed here, and we recognize variation from such recommendations based on field mineralogy with other quick and simple tests, but the deviation is wide and virtually always leaning towards fewer than recommended sampling. In our view, this is a symptom of cutting costs at the expense of proper assessment of environmental impacts.

Table 2: Waste Rock Sampling Frequency
i Estimated from Table 4-1 Waste Rock and Pit Wall Rock Characterization Report, 2008.
i It was unclear to GBRW how this category translated to categories that appeared in Table 4-1 of the Waste Rock and Pit Wall Rock Characterization Report, 2008.

GBRW obtained background documents to determine the sampling of various rock/types and alterations, unlike the general public, who might be intimidated enough by the DEIS let alone reviewing background technical documents. The DEIS should include maps showing the locations of where samples were taken, so that it is clear which areas were sampled and though with were not. These maps would also reveal the distribution of sampling. As presented in the DEIS the geochemical characterization aspect is quite opaque. Only after many hours reviewing technical background documents does a somewhat clear picture of sampling take shape. GBRW appreciates that these background documents are publically available, which we obtained, few in the general public will, and so it is vital for transparency that good visual and supporting discussion is provided in the EIS.

According to the waste rock analysis from other static and kinetic testing 27 percent of the waste rock has been classified as potentially acid generating (PAG). According to the DEIS and supporting documents the Mt. Hope deposit and surrounding waste rock is low sulfide and poor in neutralizing capacity. GBRW has noted that many of the rock types/alterations were listed as giving variable result from humidity cell tests (HCT).5 The discussion of the humidity cell tests (HCT) describes this variability, which typically involves a discrepancy between 2 or 3 test runs. This again underscores the need for additional sampling and analysis to get more of a statistical sense of what to expect from the various rock types/alterations. Overall, GBRW does not trust that EML has captured the correct breakdown of PAG versus Non-PAG for this site. We are concerned that as the mine develops more PAG material could be determined, and thu s the current analysis would underestimate the impacts.

The low sulfide statement in the DEIS pertains to an average content in the pit volume, and there were tests that indicated very high sulfide content. Thus, there will be portions of the waste rock that are likely to be very acid generating, and even low sulfide portions could produce acid drainage in exceedence of Nevada regulations. For example, samples from the Duluth Complex in northeastern Minnesota with low sulfur content, 0.41 to 0.71%, and low buffering capacity were shown to produce pH values from 4.8-5.3.6 GBRW is concerned that the belief of low sulfide (on the average) has created a false sense of security within the BLM and the general public that there is little concern over water quality at the Mt. Hope site. Even at the Lone Tree mine site in Nevada, where there exists significant carbonate deposits, and thus significantly greater neutralizing capacity the pit lake has become very acidic with no end in sight.

Overall, GBRW recommends that BLM require EML to conduct further sampling and analysis especially for those portions of the pit that are not well represented by the existing sampling such as much of the pit wall vicinity. This is needed so that impacts can be optimally determined and mitigation and best management practices can be developed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-101-Waste Rock Characterization Adequacy

Letter 858, Comment 7

Although the data is sparse given the available information such as Figures 3.3.4 to 3.3.8 in the DEIS indicate a significant potential for acid generation, but with very little neutralizing capacity. For example Figure 3.3.5, Net Acid Generation Versus Net Acid Generation pH, shows that 29% of the samples to be net acid generating and another 16% in the questionable category, so the conservative approach would be to assume that 45% or almost half could be acid forming to various extents. Thus, GBRW foresees significant acid drainage from the PAG waste rock Facility (PAGWRF), and a potentially larger footprint for the PAGWRF. A larger footprint could be very problematic, since the existing footprint is dangerously close to two springs, SP-4 and SP-3. Cleary, EML is also anticipating some acid drainage by installing a drainage system at the bottom of the PAGWRF to collect substandard water. What is not in the management plan is a discussion of the possibility of long-term treatment (possibly in perpetuity) of acidic drainage. This scenario needs to be addressed in the EIS. The implications of this scenario are far reaching. What would be the cost? The current bonding model does not include this possibility to our knowledge.
Disposition: Other (SEE RESPONSE)

Response

There is no discussion in the Waste Rock Management Plan (Appendix 4 of the plan of Operations) or the EIS about encapsulating PAG material with neutralizing material or developing layers of neutralizing rock between PAG rock. The Waste Rock Management Plan constitutes a conservative approach that is protective and appropriate. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 8

The Mt. Hope area receives significant precipitation for Nevada, and needs to look a bit north and west to see how much acid drainage is produced at the Rain Mine site. At the Rain Mine precipitation levels are comparable to the Mt. Hope area and the problematic waste rock dump at Rain is much smaller than the PAGWRF proposed for Mt. Hope. Thus, the PAGWRF is likely to capture much more water. In terms of reclamation, the two-foot cover is probably not sufficient to prevent infiltration and acid drainage. GBRW strongly recommends a thicker cover to decrease infiltration further.
Disposition: Comment acknowledged; does not provide new information

Response

The cover for the PAG WRDF was designed with the aid of a HYDRUS-1D model to predict potential water fluxes through the alluvial cover. The model predicted water flux through the cover system is in general agreement with values reported for similar ET cover systems and reclaimed heap leach piles under similar climatic conditions. The modeling indicated that the majority of infiltration reduction would be achieved with a two-foot thick alluvial cover, and for normal and dry years there would be no infiltration. The model was also used to analyze a range of cover thickness and showed that an increase in cover thickness beyond two feet would not result in an appreciable decrease in infiltration.

Furthermore, basing a cover thickness solely on the similarity of precipitation levels at two sites is an invalid over-simplification. Although the commenter does not provide information on the reclamation practices used at the Rain WRDF, the BLM acknowledges that the presence of ARD at that site is a concern; it is certainly possible that placement of a two-foot cover there would have substantially reduced the occurrence of ARD.

The PAG WRDF cover for the Project has been designed as a portion of an integrated waste rock management approach that includes characterization, segregation, WRDF design features, reclamation planning and closure planning. That is, cover placement is not the only mechanism that would be employed to prevent ARD. The design of the PAG WRDF would include the following, all of which would further reduce the potential for generation or release of ARD:

• A 12-inch thick engineered subgrade (1 x 10-5 cm/sec saturated hydraulic conductivity) and a five-foot thick overlying NAG layer for the foundation of the facility;

• Perforated collection piping with geomembrane under the pipe in topographic drainages to promote drainage from the base of the facility to a collection channel at the toe of the facility;

• Diversion channels to route upgradient surface water runoff away from the facility;

• Geomembrane-lined collection channel to route runoff and infiltration into a PAG/low grade ore stormwater collection ponds (Phase 1 and Phase 2); and

• Geomembrane-lined stormwater collection ponds (Phase 1 and Phase 2) to capture surface water runoff and infiltration from the

facilities.

Finally, it should be noted that the waste rock at Mount Hope is not directly correlative to that at the Rain Mine. Geologically, Mount Hope is a low-sulfide system. Although waste rock would be segregated into PAG and Non-PAG, the criteria that would be used for waste rock segregation are conservative, and due to the overall low reactivity of the waste rock, the potential for generation of ARD, even when water contacts PAG waste rock, is relatively low. This provides further justification for placement of the reclamation cover as designed.

No change to the EIS has been made in response to this comment.

Letter 858, Comment 9

We also note that there is discussion in the waste rock management plan7 to encapsulate PAG material with neutralizing material or develop layers of neutralizing rock between PAG rock. This would seem a reasonable best practice. The EIS needs to discuss this as a mitigation measure and EML should develop a plan for how this kind of procedure would be achieved. Again, GBRW wonders if there is a false confidence – overly optimistic perspective on how the site will behave. Once the waste rock facility is built the region is stuck with it, and adaptive management will be limited as to how to handle unexpected consequences. It is better to implement best practices when there is a luxury of options than after the fact.
Disposition: Comment acknowledged; does not provide new information

Response

There is no discussion in the Waste Rock Management Plan about encapsulating PAG material with neutralizing material or developing layers of neutralizing rock between PAG rock. The Waste Rock Management Plan has been conservatively designed and has been deemed adequate by the BLM. No change has been made to the EIS to address this comment.

Letter 858, Comment 10

The PAGWRF is very close to two springs on the north side and another on the west side. Clearly there are not a lot of options for waste rock placement, but EML should ways to avoid these springs to a much greater extent. Most likely the springs will be impacted by dewatering (unless they are from perched aquifers), and could become dry for a number of years, which is an impact of and to itself. In general GBRW us very concerned about the proximity of the PAGWRF to these water sources.
Disposition: Comment acknowledged; does not provide new information

Response

The BLM has determined that the design of the Project avoids impacts to water resources to the extent practicable. No change has been made in the EIS in repsonse to this comment.

Letter 858, Comment 11

GBRW does not support the covering of the spring on the southwest corner of the site with the non-PAG waste rock facility. Even though an engineered conduit is to be arranged to channel spring seepage away from the facility it still represents a loss of the nature outlet of the spring. In general, covering a spring can have bad consequences in the future. After mining as stopped and EML walks away the conduit could collapse and then the spring is lost or worst the non-PAG is not so non-PAG after all and an acid drainage situation develops. The EIS should analyze the possibility of the conduit collapse and resulting impacts
Disposition: Comment acknowledged; does not provide new information

Response

CC-027-Spring Drain

Letter 858, Comment 12

The DEIS does not appear to clarify the depth to groundwater under the PAGWRF, but it can be surmised by examination of groundwater contours and surface level contours. Based on this analysis the groundwater level is roughly 100 to 120 feet below the surface where the PAGWRF is planned, and that difference will widen some as dewatering occurs. Even so, GBRW is concerned that the one foot compacted layer base is not a sufficient barrier especially since acid drainage is likely (in our view). Over the long-term the drainage system may partially fail and acidic drainage would find its way into the unsaturated zone and eventually the groundwater.
Disposition: Other (SEE RESPONSE)

Response

In addition to the one-foot compacted layer identified by the commenter, the PAG WRDF and the Waste Rock Management Plan have multiple components designed to increase protection of ground water. No changes to the text of the FEIS have been made to address this comment.

Letter 858, Comment 13

Overall we recommend that BLM require EML reevaluate the design of the PAGWRF to include neutralizing aspects and the sufficiency of the base layer as a barrier, and judicious groundwater monitoring around the waste rock and tailings facilities.
Disposition: Other (SEE RESPONSE)

Response

As part of the project design, EML evaluated several design concepts, including the incorporation of Non-PAG waste rock in the PAG WRDF. In fact, this evalutation has been ongoing and continuous, as reflected in the revisons to the Plan of Operations that have been submitted throughout the environmental evaluation process. The Waste Rock Management Plan constitutes a conservative approach that is protective and appropriate. No changes to the text of the FEIS have been made to address this comment.

Letter 858, Comment 14

The pit lake water quality model used to predict pit lake water quality follows the physical model of previous pit lake estimates in that it assumes that the contributions to pit lake water quality will reflect the rain/snow runoff from the pit walls as well as oxidation of the pit wall surface, plus reactions in the pit lake and evaporative processes. This model has sometimes been referred to as the "rind" model and has been commonly used in Nevada for predicting of pit lake water quality. The key component in question for this physical model is the depth of reaction of air with the oxidizable components in the pit walls. This physical model has failed for the two recent pit lakes formed in Nevada, Cove and Lone Tree pit lakes, in that it has underpredicted the primary indicator of oxidation (sulfate) by at least a factor of 5, and probably a much higher underprediction in the case of Lone Tree. Neither pit lake was expected to exceed the solubility product of gypsum, and both have exceeded that solubility product.
Disposition: Comment acknowledged; does not provide new information

Response

The commenter assumes that the Mt. Hope pit lake modeling was prepared using an identical model to Cove and Lone Tree. On the contrary, each pit lake model is site-specific and developed independently. Pit lake modeling has evolved over the last several years and has been constantly improved based on new information and observations. The Mt. Hope model was prepared based on a site-specific conceptual model of the system, the best available data, and the most sensitive parameters were evaluated with sensitivity analyses. There is no single "rind model" for pit lake modeling. The Mt. Hope pit lake model does include solute released from the pit walls (the commenter refers to this as the "rind") in two ways: from rinsing of meteoric water down the pit walls, and again when the pit lake inundates and rinses the pit wall as the lake level increases. However, the main component (volumetric percentage) of water inflow to the pit is groundwater. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 15

The problem with the rind model is that it fails to recognize that the amount of surface exposed to air is very much larger than the thin layer of the surface of the pit lake, which is what is generally assumed in this model. Quite simply, when water is removed from an aquifer, and the water table is lowered by 2250 ft (and recovers in 200 years by 1800 ft), (DEIS pg. 3-131), water is replaced with air in the cone of depression. That air contains 20% oxygen, and it is reasonable to assume that all of the oxygen that comes in contact with oxidizable surfaces will react. Thus, it is legitimate (using conservative estimates) to calculate the amount of pyrite oxidation to form sulfuric acid simply by determining the amount of air that is drawn into the aquifer, and assuming that this oxygen reacts with pyrite to form sulfuric acid. Not all of it will contact with pyrite, but even making an assumption that half of the oxygen is available for production of sulfate, the amount of oxidation will show that much higher concentrations of sulfate are ultimately rinsed into the pit lake. In the extreme case, that all of the water pumped from the surrounding aquifers (about 500,000 acre-feet) is replaced with air, and when those surfaces are drain into the pit, the amount of sulfate delivered is about 7-10 gm/L of sulfate in the water rinsed into the pit lake (assuming 100,000 acre-feet in the pit lake). At a minimum, the pit lake will receive at least 100,000 acre-ft of water, and thus 100,000 acre ft of air, and this equates to approximately 1.4-2.0 gm/L of sulfate in the pit lake, not even taking into account the meteoric water rinsing the pit walls. This very simple analysis has at least (and probably much more) validity than the complex assumptions in the Mt. Hope pit lake model, which have not been verified. This is in addition to the amount of sulfate predicted in the pit lake model, where the sulfate concentration is 200 mg/L at 200 years, and 142 mg/L at 20 years. Under any circumstances, the physical aspects of this rind model fail with the realization that air is not diffusively transported into the wall rock; it is advectively transported when water is removed, creating a partial vacuum that is relieved by drawing in air.
Disposition: Comment acknowledged; does not provide new information

Response

CC-018-Pit Lake Model Assumption

Letter 858, Comment 16

Models for both Lone Tree and Cove pit lakes predicted low amounts of sulfate, but both are gypsum saturated as of 5 years ago, and Lone Tree pit lake has gone acidic twice, and required large amounts of lime to bring the pH to circumneutral status. Thus, the rind models of these two pit lakes have failed to predict water quality in the pit lake by a large margin. If the model cannot predict the sulfate concentrations, it is not predicting the amount of oxidation that occurs do to removal of the water.
Disposition: Comment acknowledged; does not provide new information

Response

The commenter notes that the Lone Tree and Cove pit lake models underestimated sulfate concentrations compared to the levels in the actual pit lakes that formed. It is impossible to assess the validity of this statement or the possible modeling effects of the alleged modeling inaccurracies on the Mt. Hope pit lake model without conducting a thorough review of the geology/geochemistry of those sites, and details about how those pit lake models were constructed. Such review is outside the scope of the Mt. Hope project assessment. The pit lake geochemistry model for the Mt. Hope project was prepared using currently accepted methodology and the best available information. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 17

The critical component is sulfate, and provides a lower estimate of the amount of oxidation that will occur. To our knowledge, there is no example of a pit lake in Nevada that contains pyrite, low neutralization ability, underground filling of the pit and a sulfate concentration that is less than 1000 mg/L. Thus, the Mt. Hope pit lake model is probably of no value in predicting if this water will present a risk to avian or terrestrial wildlife. It should be entirely redone, with more realistic assumptions, and discussions on why the "rind" model failed at Cove and Lone Tree. The discussion in the pit lake modeling report refers to previous work on pit lake modeling, but the critical component to determine is why both Lone Tree and Cove have much greater amounts of sulfate in the pit lakes than predicted.
Disposition: Comment acknowledged; does not provide new information

Response

CC-017-Model Uncertainty

Letter 858, Comment 18

Additionally, the rock in the walls does not appear to have much carbonate/neutralization ability, and a clear question exists as to whether the sulfuric acid formed will be neutralized; whatever neutralization capability exists may become covered with iron/manganese precipitates, which can reduce the buffering capacity in the that rock, and allow the acidic water to drain into the pit lake. It is difficult, if not impossible, to accurately predict how much acidity will drain into the pit lake, but there are compelling reasons to believe that the current pit lake model is not a reflection of what will happen. The core issue, however, is that air will be convectively transported wherever water has been removed. Those oxidation products will be rinsed into the lake, and the places where pyrite exists, the amount of acidity generated could potentially be very high.
Disposition: Comment acknowledged; does not provide new information

Response

CC-017-Model Uncertainty

Letter 858, Comment 19

BLM needs to require the evaluation of the following questions:
1. What happens when water is removed from an aquifer regarding the volume that it used to fill?
2. Assuming it is air, how much sulfate will be produced if a realistic assumption is made that over 44 years, all of the oxygen in that air is consumed by pyrite oxidation?
3. What will happen to those soluble products as the cone of depression recovers and water enters the pit lake?
Disposition: Comment acknowledged; does not provide new information

Response

CC-018-Pit Lake Model Assumption

Letter 858, Comment 20

4. Why did the models for Lone Tree and Cove fail to predict water quality in those pit lakes.
Disposition: Other (SEE RESPONSE)

Response

This comment is beyond the scope of analysis for the EIS.

Letter 858, Comment 21

As mentioned above GBRW is not convinced that sufficient sampling was performed in the geochemical evaluation of the project. In addition to our concern regarding the underlying conceptual model of the pit lake evolution is the lack of sufficient data to extrapolate water quality in time. The DEIS states that little sampling data was available from expected pit wall material. In justification the DEIS states, "There were little sampling data from some of the pit wall areas because of the relatively cylindrical nature of the orebody (pg. 3-315). This statement leaves GBRW to question how well PAG rock areas on the final pit surface are estimated as shown in Figure 3.3.10, and to what extent these areas are expected to be acid generating. The Waste Rock and Pit Wall report clarifies the situation by stating, "… because this PAG shape is based on data from historic assay pulps from the Exxon drill holes, approximately 30% of the pit material is undefined with respect to acid generating potential. For these undefined areas, the PAG shape had to be extrapolated to

the edge of the final proposed pit," (pg. 9-12). The results are presented in Table 9.1 indicating that about 1 4.5% of the final pit wall is PAG rock.8 It appears as though the 30% "undefined" material pertains largely from material associated with the pit wall, since the historic samples were primarily to determine the nature of the resource. Therefore, GBRW suspects that characterization of material associated with final pit wall amount to very few actual samples as indicated in the DEIS. The DEIS goes on to state, "Where there was a lack of data, a nearest neighbor approach was used to conservatively assign the ABA characteristics of the pit wall. The choice of extrapolating to the pit wall from the core of the ore deposit is believed to be conservative, as the geologic work on the orebody indicates that mineralization becomes more diffuse at the fringes of the deposit, making a lower potential for acid generating material in these areas." (pg. 3-315). As far as the extrapolation using the nearest neighbor approach from the ore body sample data as being conservative, GBRW does not agree. There is nothing more conservative than the real data. Even if the pit lake model is conceptually correct, there does not appear to be enough actual data to predict with any confidence the water quality in the pit lake.
Disposition: Comment acknowledged; does not provide new information

Response
CC-101-Waste Rock Characterization Adequacy

Letter 858, Comment 22

Even given the overly optimistic analysis of the pit lake there are still expected exceedences in Nevada water quality standards, in cadmium, manganese, fluoride, and antimony with cadmium at 10 times the Nevada reference standard. The DEIS does not present sufficient detail to understand in specific terms groundwater quality. The following is stated on pp. 3-171 - 3-172:

"Similar to the surface water in the vicinity of Mount Hope, ground water is generally of good quality. Similar to the spring data, there are some elevated levels of Mn, and elevated pH over the standard of 8.5.

Near the ore deposit, reducing conditions created by the presence of sulfides in the ore result in water from wells commonly exceeding regulatory standards for Fe and Mn, with several wells also having elevated TDS and SO4. Well IGM-169 has elevated levels of fluoride, Al, and As present in its water, likely related to the abundant sulfide mineralization observed in the drill cuttings from the well."

The DEIS should present tabular data on groundwater constituent analysis for sampled wells (BLM needs to correct this in the Final EIS). However, from this qualitative information it does seem as though groundwater entering the pit lake will be degraded, certainly for cadmium and possibly other constituents as well. Thus, "good quality" groundwater will become poor quality surface water.
Disposition: Comment acknowledged; does not provide new information

Response
CC-017-Model Uncertainty

Letter 858, Comment 23

The DEIS claims that at "all times during the simulated recovery period . . . , including a final equilibrium, the hydraulic gradients are inward toward the pit in all directions, indicating that the pit consistently acts as a hydraulic sink during and after mine closure" (DEIS, p 3-108). The pre-mine groundwater levels sloped several hundred feet across the proposed pit lake, which suggests the natural water levels on up- and down-gradient sides of the pit differ significantly. Because of the steep gradient in the area, it is possible that more rapid recovery in some areas may allow the pit lake to recover more quickly than the water table on all sides and at all level; simply considering the top of the water table is insufficient to predict whether the pit will always be a sink.
Disposition: Comment acknowledged; does not provide new information

Response
CC-028-Post-Mining Pit Lake Model

Letter 858, Comment 24

The groundwater inflow portion of the pit lake volume is initially small although the pit lake level recovers almost 550 feet in the first 50 years (DEIS Figure 3.3.12). Most of the simulated pit lake recovery is due to the pit wall runoff rate exceeding the groundwater inflow rate for the first 400 years (DEIS Figure 3.2.21). This could only occur if the groundwater levels around the pit recover slowly. It is therefore reasonable that the pit lake is above the groundwater level on one or more sides of the pit.
Disposition: Comment acknowledged; does not provide new information

Response
CC-028-Post-Mining Pit Lake Model

Letter 858, Comment 25

To better prove the consistent "sink" nature of the pit, Montgomery et al should add simulated monitoring wells around the pit to monitor the water levels in each model layer both at and at a small distance from the pit lake wall. Detailed consideration of the monitoring well hydrographs should provide evidence that the pit will be a sink or show that it is not. Additionally, it is essential to

consider that fractures and preferential flow paths not currently known or simulated in the model could affect the hydraulic gradients around the pit, especially on a local basis.
Disposition: Comment acknowledged; does not provide new information

Response
CC-028-Post-Mining Pit Lake Model

Letter 858, Comment 26

GBRW submits that the hydrological analysis does not preclude the potential that the pit lake in the earlier years of tilling will be flow through. If in fact flow-through is possible then there is also the possibility of degrading groundwater, which is a violation of Nevada law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-028-Post-Mining Pit Lake Model

Letter 858, Comment 27

In general, GBRW sees the real potential of degrading groundwater in two ways: 1) entering the pit and becoming degraded (surface water at that point), and 2) flowing out of the pit in the short term and degrading groundwater.
Disposition: Comment acknowledged; does not provide new information

Response
CC-028-Post-Mining Pit Lake Model

Letter 858, Comment 28

The DEIS presents the recharge by basin, referenced to Montgomery et al (2010), but describes it incorrectly. Specifically, the DEIS states that recharge had been calculated using the Maxey-Eakin method10 (Maxey and Eakin 1949), but with updated precipitation estimates (DEIS, p 3-53). This would be wrong because the original Maxey-Eakin method established recharge efficiencies based on precipitation zones published originally in 1936 and updated in the early 1960s. It is inappropriate to use Maxey-Eakin recharge efficiencies with any precipitation estimates other than those determined with the Hardman maps, as specifically stated by the Nevada State Engineer (NSE); see State Engineer Rulings 5712, 5782, and 5726 for examples (see footnote).
Disposition: Comment acknowledged; does not provide new information

Response
One precipitation - altitude zone area was recomputed (geographic area between 1,000-foot contour intervals) due to an erroneous area computation in the reconnaissance report for Kobeh Valley. This was the only modification/correction made to the Maxey-Eakin computations presented in the reconnaissance reports. There was no modification of the precipitation assumptions used in the Maxey-Eakin method, which are derived from the Hardman precipitation maps. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 29

Maxey-Eakin recharge calculations for the project area basins were completed in the reconnaissance reports for the basins, including Rush and Everett (1964)11 for Kobeh and Antelope Valleys and Eakin (1962)12 for Diamond Valley (Table 3). The DEIS used updated Maxey-Eakin estimates. Harrill (1968) used the Maxey-Eakin method to estimate recharge in Diamond Valley equals 21,000af/y. The difference is that Harrill used the 1965 Hardman map, which showed a shift in precipitation zones from north to south within Diamond Valley. The higher DEIS estimate for Kobeh Valley (Table 3) reflects Montgomery et al's (2010) calculation that the USGS had made an area determination error when determining recharge.

Table 3: Comparison of recharge determined in the reconnaissance reports (Eakin 1962; Rush and Everett 1964), the Mt. Hope DEIS, and the BCM method (Flint et al 2004).

A common criticism of the Maxey-Eakin method is that it does not consider geology; if precipitation is the same, estimated recharge would not vary between basins underlain with siliclastic rock or carbonate rock. The basin characteristics method (Flint et al 2004)13 accounts for geology by considering the modeling the soil system water balance to estimate recharge. Table 3 also presents results using the BCM method; it shows that BCM-estimated recharge for Diamond and Kobeh Valley is much less than either the recon reports or the DEIS. Antelope Valley is an exception which may be due to that valley having a much higher proportion of carbonate rock than does the other valleys (DEIS Figure 3.2.6).
Disposition: Comment acknowledged; does not provide new information

Response
There are a number of other recharge estimation methods that have been published and used throughout Nevada, including the Maxey-Eakin methods used in the DEIS and the Basin Characteristics method noted n the comment. Presently, for the study area basins, the

NDWR recognizes a perennial ground water yield for the study area basins that is derived from the reconnaissance estimates of Maxey-Eakin recharge and ground water discharge, and this method was deemed appropriate for use in the EIS. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 30

The method of distributing recharge around the model, as described by Montgomery et al (2010, p 124 - 1 26) appears acceptable, in that they used PRISM to distribute the pre-estimated recharge (rather than with Maxey-Eakin coefficients) and adjusted the results during calibration, which indirectly should account for geology. The results of that redistribution are not encouraging, though (Figure 1). There is significantly high recharge all along the Roberts Creek Mountain massif, including zones 40, 63, and 3, as shown on Figure 1. A portion of these zones coincide with carbonate outcrops (Figure 2), but the eastern half is siliclastic rock which normally has very low infiltration capacity. Typically, mountains with siliclastic rock have perennial or at least intermittent streams running off of them, as does Roberts Creek Mountain as evidenced by Henderson Creek, Vinini Creek, and others; mountains with carbonate rock outcrops have little perennial surface flow. Both SNWA (2009) and Myers (2011) found in the Snake and Schell Creek Ranges that recharge was close to zero in areas with siliclastic outcrops which correspond with the perennial streams in those mountains; those two mountain ranges have more precipitation than does the Roberts Creek Mountain, so it would be incorrect to respond that the difference this area and the Snake and Schell Creek Ranges could be climate.
Disposition: Comment acknowledged; does not provide new information

Response

CC-098-Recharge in the Model

Letter 858, Comment 31

Figure 1 also shows the recharge through Henderson Creek, just north of the Roberts Creek massif, as zone 62. The rate for the small model cells is 26.7 in/y, and Montgomery et al (2010, Table 4.1-3) has two entries that include Henderson Creek (in Pine Valley and Garden Valley) equaling 4853 and 3041 af/y, respectively (Id.). The measured flow data is about 2900 gpm (DEIS, Table 3.2 -2) (4600 af/y).

Henderson Creek lies in a relatively deep canyon and is underlain by Quaternary deposits, mostly alluvium (Figure 2). Simulated groundwater contours (Figure 3) show that water converges into Henderson Creek, meaning the creek is a sink for groundwater (see the discussion below on the need for simulating Henderson Creek as a drain).

Figure 3: Snapshot from Figure 4.4-3, Montgomery et al (2010).

Drawdown contours around Mt Hope and the proposed pit are instructive. Figure 4 shows the development of the drawdown around the pit during dewatering and pit lake development. A striking feature is that the drawdown extent remains steady with time for nearly 400 years. It closely parallels South Fork Henderson Creek, Henderson Creek, and Garden Pass Creek. The BLM identifies these features as being affected by the ten-foot drawdown and proposed mitigation for them if they go dry due to mine related drawdown. The recharge that occurs northwest of the mine likely limits the extent of predicted drawdown at these points.
Disposition: Comment acknowledged; does not provide new information

Response

Henderson Creek is an intermittent stream through the Garden Valley portion of Pine Valley, and is observed to be a losing stream reach in the lower mountain block (not a sink for ground water). Recharge from stream flow in the model was assigned to the lower losing and intermittent reach, and is a steady-state boundary condition in the model. Drawdown from the Project pumping is determined assuming the stream source recharge is the same in the No Action and Proposed Action modeling simulations, and Project related drawdown is determined as the difference between the two simulations. Therefore, the presence of this recharge, which is held constant during both simulations, does not have any influence on the predicted extent of drawdown. The predicted extent and magnitude of Project drawdown is governed by the pumping stress and the hydraulic properties of the rock types, not the presence or absence of a constant recharge rate. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 32

These stream features are not directly modeled as a boundary that drawdown can affect, rather they are treated as specific flux boundaries with a specified recharge input along the stream channel. The amount of recharge input in Henderson Creek appears unjustified by the streamflow measurements. That the creek apparently limits the extent of that drawdown expansion verifies the concern.
Drawdown under these creeks can only harm the creek if the water table intersects with the stream bottom so that there is a hydraulic connection. The BLM should model these streams as drain or stream boundaries so that changes in discharge to or from the stream can be estimated and disclosed in the DEIS.
Disposition: Comment acknowledged; does not provide new information

Response

Streams are not represented as a specified flux boundary condition. Recharge resulting from stream flow is represented at locations where stream flow is interpreted to provide a significant source of ground water recharge. In the case of Henderson Creek, stream recharge is north of Mount Hope in Garden Valley. The recharge magnitude is greater than just the estimated flow in upper forks of Henderson Creek, because it includes tributary flows to Henderson Creek along the reach through Garden Valley, which includes inflow from Vinini Creek and other drainages on the eastern side of the Roberts Mountains. Stream flow in Henderson Creek is primarily derived from precipitation and snow melt run-off, which is a watershed process not represented in the ground water flow model, and not explicitly connected with the ground water flow system. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 33

High recharge in the SF Henderson Creek would directly support the filling pit lake and would directly limit the expansion of the drawdown. Model layer 1 is active under the headwaters of Henderson Creek. Because it is in a canyon, the model layer thickness is probably in the less than 50 foot category and the layer simulates the water table near the surface. Montgomery et al (2010) do not present information as to whether the groundwater discharges to the creek; the seepage run they present has very low flows

It appears therefore that Montgomery et al may have an error in its conceptual model for the Henderson Creek north of Mt Hope which may limit the extent of drawdown north and northwest of the proposed mine.
Disposition: Comment acknowledged; does not provide new information

Response

Recharge along Henderson Creek is a fixed boundary condition and does not contribute to enhanced pit filling in the model. Ground water flow to the pit is dependent on the pit depth and hydraulic properties of the surrounding formation. The simulation method used for the Project model provides projected drawdown beneath stream locations, which is sufficient to identify a potential impact. Actual stream flow dynamics can be quite variable both spatially and temporally, and can change with differing flow regimes. To overcome real world complexities, it is the BLM's preference to rely upon predictions of the extent and magnitude of drawdown in these regions and then assume that the drawdown may impact spring and groundwater dependent portions of stream flow. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 34

Their model ignores an important aspect of recharge with time. As the water table near the pit lowers due to dewatering, the distance between the ground surface and water table increases; near the pit the water table draws down up to 2250 feet. This drawdown increases the distance through which recharge must flow to actually reach the water table. Inflow to the pit lake may initially be less than simulated because the modeling does not account for the time for unsaturated flow through up to 2250 feet.
Disposition: Comment acknowledged; does not provide new information

Response

The lag time for recharge infiltration to reach the lowered ground water table is neglected as a simplifying assumption for development of a numerical model of this type. The aerial extent and volume of recharge affected by this lag is very small and would have immaterial effects on the pit filling model projections over the period of evaluation. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 35

Recharge near the proposed production wells in Kobeh Valley is near zero because the wells will be near the center of the valley. Recharge to Kobeh Valley occurs primarily in the mountains bounding the valley with some runoff recharging at the point where runoff reaches the basin fill. Pumping initially removes water from storage which creates a gradient and draws flow from the points of recharge. Because the simulated recharge is primarily into the bedrock, with a large proportion occurring north of the proposed well field in the Roberts Mountain, the water has to flow a significant distance to the well. Recovery from production pumping may take longer because of this distance.
Disposition: Comment acknowledged; does not provide new information

Response

Pumping draws ground water from storage and from head dependent variable flux boundaries such as ET boundaries. Under pre-pumping conditions, recharge from the mountain areas takes hundreds of years to reach the central valley area where the Kobeh Valley Wellfield would be located. Drawdown from pumping would increase the ground water gradients towards the wellfield, resulting in a release of precipitation-sourced ground water from storage, and causing that precipitation-sourced ground water to reach the central basin more rapidly than would have occurred under pre-pumping conditions. These pre-pumping and pumping ground water conditions are correctly simulated in the model and recovery from production pumping would not take longer than projected by the model. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 36

The proposed production wells in Kobeh Valley southwest of the minesite will cause a very substantial drawdown over about a quarter of the valley (DEIS Figure 3.2-18). However, the drawdown extent does not approach the boundary with Diamond Valley within the time period of the project. The DEIS is not inaccurate in its presentation of the impacts.
Disposition: Comment acknowledged; does not provide new information

Response

Drawdown from the Project does extend to the Diamond Valley basin boundary. The potential impacts that are disclosed in the EIS are based on the hydrology model, and provides a valid and accurate assessment of the potential drawdown and associated potential impacts. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 37

However, there is no guarantee that the pumping associated with the mine will actually cease after 32 years because the water rights issued for the project are not temporary. The mining company will have 11,200 afa of certificated water rights which may be changed, either their point of diversion or place and type of use, after the mine closes.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 858, Comment 38

The pumping is less than the perennial yield for the valley, as determined by the NSE in Ruling 6127. The extensive predicted drawdown is evidence of the amount of drawdown that developing close to a perennial yield may cause – the drawdown will continue to expand as the level near the wells recovers or the wells continue pumping for new uses. The BLM should consider the impacts of pumping the wells in Kobeh Valley beyond the mine life because continued use would be a connected action; if the mining company did not permit and certificate the water rights, the pumpage would not occur.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 858, Comment 39

The DEIS presents a monitoring plan for surface and groundwater resources in Appendix B (DEIS App B). Monitored parameters include flow rate for surface water, depth to groundwater, and water chemistry.

Figures 1 and 2 and Table 1 in the DEIS Appendix B show locations and list the proposed and existing monitoring wells. The number of and spatial location of the wells dedicated to monitoring the groundwater level, which could be affected by production water pumping or mine pit dewatering, appears adequate and even exceeds that seen initially for other large mining projects. The plan does not specify details about the screens, however. The plan also includes surface water flow monitoring on a continuous basis, which is excellent. Proposed water quality monitoring near the mine facilities is not well described or specified, however. This section discusses more details and makes recommendations regarding the proposed monitoring.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 858, Comment 40

The plan, in point 13, states that the data collection will be used "to assist in defining baseline conditions"; also, 23(d) refers to "baseline chemistry analyses" (DEIS App B, p 5). The plan does not define "baseline" or specify for how long such data should be collected before mine construction could begin; two years should be the minimum. The chemistry monitoring wells must be sampled sufficiently often to establish seasonal trends (water level data is collected seasonally).

Point 14 notes that there will be 14 new monitoring wells constructed. It is difficult to verify these wells on Figure 2 and Table 1 does not denote which wells would be new. For example, wells MH-403 and MH-404 appear to be proposed to monitor drawdown in the upper parts of Robert's Creek, but wells MH-405 through MH-411 are production wells that Table 1 presents as monitoring wells (see next paragraph). The BLM should specify on Table 1 those wells that are yet to be constructed. Table 1 should also specify for clarity whether the wells monitor production or dewatering drawdown; the comment on the right column is not specific and does not make it easy to group the wells. Point 14 should be made more clearly by specifying where the new wells would be constructed (Kobeh or Diamond Valley, production or dewater field).

Figure 2 shows wells MH-405 through MH-411 are production wells but Table 1 shows them as monitoring wells (DEIS App B, p 11). The same table has a row specifying that "all production wells" will be continuously monitored for flow and depth to water. The table makes it appear there will be six monitoring wells in addition to the production wells but the figure shows that it is not correct. The BLM should clarify because the document apparently double-counts monitoring wells. The production wells are all located in the center of the drawdown in central Kobeh Valley and the figure does not show any monitoring wells among the production wells.

Monitoring water level in production wells is necessary, but not sufficient, for defining the potentiometric surface in the area. There should be monitoring wells between the production wells to define the surface. It is important to have monitoring wells, at least four, centered in the cluster of production wells.

Point 15 indicates that test wells, "drilled near each planned production well location" (DEIS App, p 3), would be converted to monitoring wells. Presumably, the test wells will test production. In general, production wells make lousy monitoring wells because the screen length is too long. Whether monitoring water level, chemistry, or both, the level or the sample represents an average over the screened interval. Regarding water level, the observed depth to water represents the water level from the most transmissive zone intercepted by the screen; it can fail to detect drawdown in less transmissive formation layers. A water sample, if water in the well is fully mixed, is a weighted average of the water entering from all formation layers, with the weighting depending on transmissivity. If the more transmissive layer has cleaner water, contamination will be missed.
Therefore, monitoring wells should have relatively short well screens that are targeted to the specific layer desired to be monitored. Twenty feet is a common screen length. The plan mentions that some wells may be paired in alluvium and bedrock to consider the connection between lithologies; even better would be the installation of multiport wells in which the water level can be monitored simultaneously at various levels.

Point 19 indicates that the groundwater model will be updated after "recovering 6 months of post-operational monitoring data" (DEIS App B, p 4). The meaning of this is unclear. Does "recovering" mean collecting data so that the intent is for a model update 6 months after mine construction begins? "Post-operational" could mean once operations has ceased, but that certainly is not the intent herein, or rather it should not be.

The monitoring plan must also specify for how long after mining the wells would be monitored. Those associated with dewatering and pit lake refill must essentially be monitored in perpetuity. The BLM should specify based on the amount of observed water level recovery how long they will be monitored. The intent should be for steady state to be reestablished, but because complete recovery takes an infinite amount of time, recovery of more than 90% of the drawdown is acceptable.

Table 1 shows only four wells to be monitored for chemistry, IGMI-234P, IGMI-235P, IGMI-237P, and TM1-B. The first three are near the process facilities in Kobeh Valley. IGMI-236P is also a monitoring well near the facilities (DEIS App B Figure 2), but Table 1 shows it only monitors depth to water; this is likely incorrect and it should be shown to monitor chemistry. This monitoring appears to occur only near the tailings impoundment; it is insufficient because large areas around the tails could pass a contaminant plume without being sampled. The BLM should require more extensive chemistry monitoring near the tails, and also near the waste rock dumps.

Additionally, monitoring plan does not consider the drainage from the waste rock. The PAG waste rock dump has a liner (but this is a compacted clay layer) and collection facility; the BLM should require that both the flow rate and chemistry be monitored regularly. This monitoring must continue into the future, after reclamation, until the monitoring shows that seepage has ceased or that acid generation is not going to occur.
Disposition: Other (SEE RESPONSE)

Response

Data has been collected at most locations identified in the Water Resources Monitoring Plan (WRMoP) for several years. EML has modified the WRMOP (Appendix 4 A) to more clearly identify the new wells. The second sentence of Point 14 has been revised to read: "These wells are numbered MH-300, MH-301, MH-302, MH-303, MH-304, MH-305, MH-400, MH-401, MH-402, MH-403, MH-404, MH-500, MH-501, and MH-502, and the preliminary proposed locations of these wells are shown on Figures 1 and 2; actual locations may be adjusted in consultation with the BLM, NDWR, and/or TAP. Table 1 has been revised to state "To be Constructed" in column 2, immediately following the site name. These changes allow the reader to more clearly discern the proposed locations of the new wells. EML has revised Table 1 to clarify the correlation between production wells and production test wells. A new row has been added to Table 1 immediately following the first row in the Area designated Kobeh Valley Groundwater. The first row currently is identified: "All Production Wells." The new second row has been labeled "All Production Test Wells." The labels on Figures 1 and 2 better show that there will be a test well, which will be used to monitor groundwater levels in the immediate vicinity of every supply well in the Kobeh Valley water supply wellfield. Well 236P is upgradient of the South TSF, and a water quality baseline has been collected. It is not necessary to continually monitor chemistry of this well to identify impacts from the TSF - those impacts would move downgradient only. In addition to the monitoring required by the BLM, EML will have a Water Pollution Control Permit with additional monitoring requirements established by NDEP/BMRR to oversee ground water protection.

Letter 858, Comment 41

The BLM continues its standard practice of using the ten-foot drawdown zone as the "area of potential concern regarding impacts to water resources" (DEIS, p 3-63); they note the approach is "commonly used . . . for EISs in Nevada" (Id.). This is inappropriate for the following reasons:
• Any drawdown at all can cause a spring to go dry. A phreatic spring occurs where the water table intersects the ground surface; lowering the water table may turn a flowing spring into a muddy area. Discharge from fracture-controlled springs can change if just the gradient at the spring changes – drawdown is not even required. The BLM should use the 1-foot drawdown, just as the U.S. Geological Survey did in its study of pumping impacts to Great Basin National Park (Halford and Plume 2011)14.
• A ten-foot drawdown could have a disproportionate impact to wells. That is because wells are not uniformly productive across the entire thickness of the screen. Instead, a well's productive zone often includes several productive zones with several low-conductivity zones. It is possible that drawing the water table down by 10 feet will draw the water table below the most productive formation zone in the well and cause it to lose much more flow than a standard well flow calculation might estimate.
Disposition: Comment acknowledged; does not provide new information

Response

CC-096-Ten-Foot Isopleth

Letter 858, Comment 42

The DEIS uses the simulated groundwater levels in 2009 as a baseline against which to calculate future drawdown. This is a common and standard practice because the simulation fills in groundwater levels between the wells where observations are available. However, the predicted drawdown should be considered accurate only if the simulated levels accurately represent the actual levels. The DEIS should compare the simulated to observed values in 2009.
Disposition: Comment acknowledged; does not provide new information

Response

CC-097-2009 Steady State Condition

Letter 858, Comment 43

The DEIS apparently only considers the effect of drawdown on surface water resources if that resource is "covered by a water right" (DEIS, p 3-72). That is not proper. The BLM is responsible for surface water resources on the land it manages without regard to it water right status.
Disposition: Comment acknowledged; does not provide new information

Response

The commenter is incorrect. Although the EIS includes a subsection of section 3.2.3.3.1 that specifically addresses surface water resources with a water right, the effect of drawdown on surface water sources is not restricted to those with water rights. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 44

The DEIS apparently is separating pit lake evaporative loss into components, with that due to groundwater inflow decreasing over time. The DEIS states that after 100 years, the consumptive loss of groundwater "due to pit lake evaporation" would be approximately 165 gpm and that it would reduce to 100 gpm after 800 years (DEIS, P 3-108). This statement is confusing, because Figure 3.2.21 shows that it is gro undwater inflow, which decreases as the pit lake fills, and that pit lake evaporation increases, as it should, due to the increasing pit lake area. The DEIS then notes that the NSE may require a water right for the pit lake consumptive use. The BLM's breakdown ignores the fact that some of the precipitation on the pit lake and on the pit walls would also have become recharge and part of the groundwater budget. This additional portion of pit lake evaporation should also be considered a consumptive use of groundwater with respect to pit lake consumptive uses.
Disposition: Other (SEE RESPONSE)

Response

As shown on Figure 3.2.21 of the Montgomery & Associates and interflow, 2010 report, 100 years after mining, groundwater inflow to the pit lake is approximately 165 gpm, and is approximately 100 gpm after 800 years. The higher early inflow represents contributions to lake storage; after 800 years there is essentially no change in lake storage. As the pit lake surface increases, evaporation increases in concert with the increasing direct precipitation to the lake. Over time direct precipitation becomes the largest component of the pit lake inflow. No changes to the text in the FEIS have been made to address this comment.

Letter 858, Comment 45

The DEIS acknowledges that: "Implementation of the Proposed Action would result in adverse effects to 83 officially eligible [for the National Register of Historic Properties] sites within the area of direct impacts. Outside of this area but within the Project APE, this action would also have indirect impacts on 180 officially eligible and one unevaluated site." DEIS at ES-37. "These direct impacts are considered to be significant." Id.

In an attempt to prevent/mitigate these impacts, the DEIS says that a "treatment plan" will be developed in the future:
Mitigation Measure 3.21.3.3-1: EML would develop, and submit to the BLM for approval, a treatment plan to address the potential direct impacts to the 83 officially eligible sites within the Project APE. EML would implement the treatment plan prior to any surface disturbance of eligible sites within the area of direct impacts. All adverse effects under the NHPA and direct and indirect impacts under the NEPA to known-eligible properties within the Project APE would be mitigated in accordance with the PA and the treatment plan prepared for the Project. (DEIS pg. ES-37). The DEIS goes on to conclude that: "The implementation of the treatment plan under the mitigation measure would be very effective at lessening the impact." Id. See also DEIS at 4-68, relying on the future "treatment plan" to supposedly mitigate cumulative impacts to these resources.
Disposition: Comment acknowledged; does not provide new information

Response

CC-116-Mitigation for Eligible Cultural Sites

Letter 858, Comment 46

However, because the "treatment plan" for these resources has not yet been developed, how can BLM claim that it will be "very effective at lessening the impact"? Such speculative reliance on future mitigation measures violates BLM's duties under NEPA to fully consider mitigation measures, and their effectiveness. Under NEPA, the agency must have an adequate mitigation plan to minimize or eliminate these impacts – which the DEIS does not have. NEPA requires the agency to: (1) "include appropriate mitigation measures not already included in the proposed action or alternatives," 40 CFR § 1502.14(f); and (2) "include discussions of: .. . Means to mitigate adverse environmental impacts (if not already covered under 15 02.14(f))." 40 CFR § 1502.16(h). NEPA regulations define "mitigation" as a way to avoid, minimize, rectify, or compensate for the impact of a potentially harmful action. 40 C.F.R. §§1508.20(a)-(e). "[O]mission of a reasonably complete discussion of possible mitigation measures would undermine the 'action-forcing' function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of the adverse effects." Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 353 (1989).
Disposition: Comment acknowledged; does not provide new information

Response

CC-116-Mitigation for Eligible Cultural Sites

Letter 858, Comment 47

NEPA also requires that the agency fully review whether each mitigation measure will be effective. See South Fork Band Council v. Dept. of Interior, 588 F.3d 718, 728 (9th Cir. 2009). "The Forest Service's broad generalizations and vague references to mitigation measures ... do not constitute the detail as to mitigation measures that would be undertaken, and their effectiveness, that the Forest Service is required to provide." Neighbors of Cuddy Mountain v. U.S. Forest Service, 137 F.3d 1372, 1380-81 (9th Cir. 1998).
The DEIS's reliance on a future, as yet-unsubmitted, "treatment plan" to prevent/mitigate adverse impacts to these resources also violates BLM's duties under the National Historic Preservation Act [NHPA]. The NHPA, and its implementing regulations, require full review of these impacts as part of the public review process – something which has not occurred here.
Disposition: Comment acknowledged; does not provide new information

Response

CC-116-Mitigation for Eligible Cultural Sites

Letter 858, Comment 48

BLM also failed to conduct the required government-to-government consultation with potentially affected Native American Tribes. Appendix E of the DEIS lists some letters sent to Western Shoshone Tribes and Bands, yet for many Tribes/Bands, only a few (or less) letters were sent in 2007 and 2008, after which the BLM stopped sending any communications. At a minimum, a simple letter or two is not sufficient to satisfy the NHPA and related consultation duties under Presidential Executive Orders. Further, BLM's failure to send any letters at all to many Tribes/Bands after 2007/08 cannot be said to be government-to-government consultation. Also, the few letters contained in Appendix E deal only with the Programmatic Agreement that would be developed and does not constitute the detailed consultation on the Project required by the NHPA and Executive Orders. Further, without proper and full consultation, and involvement from all Western Shoshone communities, the DEIS's analysis of impacts to, and mitigation of, these resources cannot be considered adequate or reliable.
Disposition: Other (SEE RESPONSE)

Response

Section 3.22.2.2.1 of the DEIS discloses the consultation activities undertaken by the BLM for the Project. No changes to the text of the FEIS have been made to address this comment.

Letter 858, Comment 49

The DEIS states that EML has a "statutory right ... [to] develop federal mineral resources" at the site (DEIS pg 1-9). Thus, according to the DEIS, EML has a statutory right to conduct its waste rock and tailings dumping, pit excavation, processing, and other operations based solely on the fact that the company has blanketed the projects lands with mining and/or millsite claims.

Here, although it is difficult ascertain the exact number and nature of the claims from the DEIS, EML has filed lode mining and/or millsite claims on all of the federal lands in the project area, including those where no mining is proposed (i.e., dumping, processing, and other ancillary uses). According to the BLM, the filing of these claims precludes the agencies from choosing the no-action alternative, as well as significantly restricting its approval and review authority over the project.
The BLM's position is wrong. Such rights, or "entitlement" as stated by the BLM, can only accrue to the company if these claims are valid under the 1872 Mining Law. Here, there is no evidence in the record that these claims are valid. Indeed, the agencies have not even inquired into whether these claims are valid, and apparently has no intention to conduct such an inquiry.
Accordingly, in addition to making an arbitrary and capricious decision without evidentiary support, the BLM violated the Federal Land Policy and Management Act (FLPMA) and the 1872 Mining Law (as amended) by not requiring EML to pay Fair Market Value (FMV) for the use of public lands not covered by valid mining claims, based on the lack of any evidence that the vast majority of the claims at the Project site are valid under the Mining Law. Similarly, BLM's position also violates provisions of FLPMA and the Multiple Use Sustained Yield Act and other laws mandating that BLM manages, or at least considers managing, these lands for non-mineral uses – something which BLM refused to do or consider in this case.
The DEIS's review and the BLM's proposed approval of the Project are based on the overriding assumption that EML has statutory rights to use all of the public lands at the site under the 1872 Mining Law. However, where Project lands have not been verified to contain, or do not contain, such rights, the BLM's more discretionary multiple use authorities apply. See Mineral Policy Center v. Norton, 292 F.Supp.2d 30, 46-51 (D.D.C. 2003).
A proper application of BLM's multiple use, public interest, and sustained yield mandates to those areas not covered by valid claims would result in a very different Project review, alternatives, and level of protection for public land resources and values, as well as reducing or eliminating the adverse impacts to the use of these lands by members of the public and commenters.
The Mineral Policy Center court specifically recognized the federal government's duty to apply its broader, multiple use authority when mineral development operations are proposed on lands not subject to valid and perfected claims:
While a claimant can explore for valuable mineral deposits before perfecting a valid mining claim, without such a claim, she has no property rights against the United States (although she may establish rights against other potential claimants), and her use of the land may be circumscribed beyond the UUD standard because it is not explicitly protected by the Mining Law.
292 F.Supp.2d at 47. The court was equally clear as to what was required to "perfect" a mining claim: The Mining Law gives individuals the right to explore for mineral resources on lands that are "free and open" in advance of having made a "discovery" or perfected a valid mining claim. United States v. Locke, 471 U.S. 84, 86, 105 S.Ct. 1785, 85 L.Ed.2d 64 (1985). The Mining Law provides, however, that a mining claim cannot be perfected "until the discovery of the vein or lode." 30 U.S.C. § 23.
Id. at 46 n.19.
Regarding the apparent millsite claims at the site, the DEIS is based on the view that EML can locate and use as many millsite claims as it needs for Project operations. DEIS at 1-9. That is wrong, as a proper understanding of the millsite provision in the Mining Law, 30 U.S.C. §4 2, shows that EML can only locate one 5-acre millsite claim (or multiple millsite claims with a maximum of 5 acres total) for each valid lode claim to be used by the Project.
For both lode and millsite claims for which BLM has not determined are valid, pursuant to the Mineral Policy Center decision:
[b]efore an operator perfects her claim, because there are no rights under the Mining Law that must be respected, BLM has wide discretion in deciding whether to approve or disapprove of a miner's proposed plan of operations.
Id. at 48. In its review of the Project, BLM erroneously believed that it did not have – and never even considered – this "wide discretion" to "approve or disapprove" any part of EML's Plan of Operations.
Regarding the requirement for the federal government to obtain Fair Market Value for the use of lands not covered by valid claims, the court held that, under FLPMA, "the United States [must] receive fair market value of the use of the public lands and their resources unless otherwise provided for by statute." 43 U.S.C. ¤1701(a)(9). The court held that unless the lands were covered by valid claims (i.e. the situation "otherwise provided for by statute" in ¤ 1701(a)(9)), the agencies must comply with their Fair Market Value duty: Operations neither conducted pursuant to valid mining claims nor otherwise explicitly protected by FLPMA or the Mining Law (i.e., exploration activities, ingress and egress, and limited utilization of mill sites) must be evaluated in light of Congress's expressed policy goal for the United States to "receive fair market value of the use of the public lands and their resources." 43 U.S.C. ¤ 1701(a)(9).
Id. at 51.
At Mt. Hope, the BLM has utterly failed to even consider the application of its multiple use authority, and related Fair Market Value requirements pursuant to the Court's Order in Mineral Policy Center Ð a violation of FLPMA, the Mining Law, and their multiple use mandates, as well as being an arbitrary and capricious decision under the Administrative Procedure Act (APA).
As noted above, the vast majority of the proposed disturbance on public land involves waste rock, tailings, processing and other non-extractive uses covered by unpatented lode and/or millsite claims. There is no evidence in the record that any of these claims are valid or indeed contain locateable minerals (outside of arguably the lode claims covering the edges of the mine pit, although the validity of these claims have also never been ascertained). Indeed, it is likely that the lands covering the waste rock, tailings, and other ancillary facilities do not contain the requisite locateable minerals, which is a prerequisite for claim validity. See 30 U.S.C. § 22 (only "valuable mineral deposits" are covered by the Mining Law); 30 U.S.C. 611 ("common varieties" of minerals are not locatable under the Mining Law). As the Interior Department has held: Generally, absent the discovery of a "valuable mineral deposit" on each of the unpatented lode mining claims, ASARCO would not be entitled to the "exclusive right of possession and enjoyment of all the surface [of the claim]" and subsurface rights under 30 U.S.C. ¤¤ 22 and 26, good against the United States, or ultimately to a patent of the claimed lands, pursuant to 30 U.S.C. ¤¤ 22 and 29 (2000). Best v. Humboldt Placer Mining Co., 371 U.S. 334, 335-36 (1963); Wilbur v. Krushnic, 280 U.S. 306, 316-17 (1930); Cameron v. United States, 252 U.S. 450, 460 (1920); Cole v. Ralph, 252 U.S. 286, 294-96

(1920). In such circumstances, BLM would have discretion to modify or even reject an MPO filed to engage in mining operations and related activity. Great Basin Mine Watch, 146 IBLA 248, 256 (1998) ("Rights to mine under the general mining laws are derivative of a discovery of a valuable mineral deposit").
Center for Biological Diversity, 162 IBLA 268, 278 (2004). "[T]he location of a mining claim does not render a claim presumptively valid and the Department may require a claimant to provide evidence of validity before approving an MPO or allowing other surface disturbance in connection with the claim." Id. at 281. (see footnote)
In addition, BLM's decision not to require the payment of Fair Market Value, and to limit its authority over the use of the ancillary lands, must be supported by substantial evidence in the record - evidence which does not exist. The agency cannot simply assume, without any evidence (and indeed the evidence points to the contrary) that the lands to be buried by the dumps and processing facilities are covered by valid mining claims. The Supreme Court has explained: [A]n agency rule would be arbitrary and capricious if the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.
Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto Ins. Co., 463 U.S. 29, 43 (1983). The Ninth Circuit, citing Motor Vehicle Mfrs, has explained: [T]he APA requires us to determine whether the Commission's decision was a reasonable exercise of its discretion, based on consideration of relevant factors, and supported by the record.... While our standard of judicial review is highly deferential, it may not be uncritical. Under the APA, an agency's discretion is not boundless, and we must satisfy ourselves that the agency examined the relevant data and articulated a satisfactory explanation for its action based upon the record.
People of State of Cal. v. F.C.C., 905 F.2d 1217, 1230 (9th Cir. 1990). See also Marsh v. Oregon Natural Resources Council, 490 U.S. 360, 378 (1989)(requiring that courts ensure that agency decisions are founded on a reasoned evaluation "of the relevant factors.").
Put another way, it defies the record in this case, and indeed common sense, for the agencies to assume that EML would permanently bury "valuable mineral deposits" with hundreds of millions of tons of waste rock and contaminated tailings. Indeed, it is very likely that these ancillary lands do not contain sufficient mineralization to qualify as "valuable mineral deposits" and are in fact simple "common varieties" of rock and sand covering the non-mineralized portions of the Project site.
At a minimum, the agencies should have inquired as to whether the vast majority of the Project lands contained "common varieties" or "valuable mineral deposits." BLM regulations contemplate an investigation into whether the lands covered by proposed plans of operation contain the requisite locateable minerals instead of common varieties. Under 43 CFR 3809.101(a), except for casual use operations, claimants "must not initiate operations for minerals that may be 'common variety' minerals . . . until BLM has prepared a mineral examination report."
In this case, due to the evidence showing that the lands proposed for the waste dumping, tailings, and other non-extractive uses do not contain the requisite valuable minerals (e.g., the mineralized zone is limited to the mine pit, even then the pit has not been verified to be covered by valid claims), and may indeed be "common variety" minerals, BLM's assumptions of "rights" or an "entitlement" under the Mining Law are erroneous. For those lands covered by millsites, although the "valuable mineral deposit" requirement does not apply, the strict limits on the number of millsites contained in the Mining Law have been violated and the vast majority of those claims are thus invalid. At a minimum, the agency's assumptions of these rights/entitlements should have been investigated and supported by detailed factual evidence - evidence lacking in this case.
Disposition: Comment acknowledged; does not provide new information

Response

CC-109-Purpose and Need

Letter 858, Comment 50

As noted herein, the DEIS failed to fully consider all "direct and indirect impacts" under NEPA. These failures are in addition to the DEIS' failure to review the "cumulative impacts" from all "past, present, and reasonably foreseeable future actions" under NEPA. 40 CFR § 1508.7. In this case, the DEIS' analysis of cumulative impacts consists largely of a listing of the number of acres affected by the past, present, and reasonably foreseeable future surface disturbances for the cumulative impact areas (DEIS Chapter 4). Although the DEIS contains a short paragraph or two discussing cumulative impacts to some resources, the document provides no additional information on the actual cumulative impacts.
The Ninth Circuit recently and squarely rejected such reliance on the listing of the acreages of other projects as the primary mean s to review cumulative impacts: A calculation of the total number of acres to be [impacted by the other projects] in the watershed is a necessary component of a cumulative effects analysis, but it is not a sufficient description of the actual environmental effects that can be expected from [impacting] those areas.
Klamath Siskiyou Wildlands Center v. BLM, 387 F.3d 989, 995 (9th Cir. 2004): [T]he general rule under NEPA is that, in assessing cumulative effects, the Environmental Impact Statement must give a sufficiently detailed catalogue of past, present, and future projects, and provide adequate analysis about how these projects, and differences between the projects, are thought to have impacted the environment. See Neighbors of Cuddy Mountain v. United States Forest Serv., 137 F.3d 1372, 1379-80 (9th Cir.1998); City of Carmel-By-The-Sea v. United States Dept. of Transp., 123 F.3d 1142, 1160-61 (9th Cir.1997).
Lands Council v. Powell, 395 F.3d 1019, 1028 (9th Cir. 2005): The [agency] cannot simply offer conclusions. Rather, it must identify and discuss the impacts that will be caused by each successive [project], including how the combination of those various impacts is expected to affect the environment, so as to provide a reasonably thorough assessment of the project's cumulative impacts.
Klamath Siskiyou, 387 F.3d at 1001. In a major mining and NEPA decision, the Ninth Circuit recently specifically rejected the type of brief mention or listing of projects/acreages as found in the DEIS: In a cumulative impact analysis, an agency must take a "hard look"

at all actions. An EA's analysis of cumulative impacts must give a sufficiently detailed catalogue of past, present, and future projects, and provide adequate analysis about how these projects, and differences between the projects, are thought to have impacted the environment.... Without such information, neither the courts nor the public ... can be assured that the [agency] provided the hard look that it is required to provide.
Te-Moak Tribe of Western Shoshone, 608 F.3d 592, 603 (9th Cir. 2010) (Rejecting EA for mineral exploration that had failed to include detailed analysis of impacts from nearby proposed mining operations. Although that case involved an EA, the need for a complete cumulative impacts analysis also fully applies to an EIS).
In Great Basin Mine Watch v. Hankins, 456 F.3d 955, 971-974 (9th Cir. 2006), the court struck down the same sort of acreage listing and brief, generalized descriptions of mining impacts in the region. The court required BLM to include "mine-specific ... cumulative data." Id. at 973. Relying on Klamath-Siskiyou, and Lands Council, the court highlighted the need for a "quantified assessment of their [other projects] combined environmental impacts" and "objective quantification of the impacts." Id. at 972. That has not been done here.
For example, although the DEIS lists the nearby mining and other projects on cultural, Native American, water, wildlife, air, and other resources, there is no "mine-specific ... cumulative data" for any other these past, present, or reasonably foreseeable future actions. Nor is there a "quantified assessment of their [other projects] combined environmental impacts" and "objective quantification of the impacts." Another example involves potential oil and gas operations. Although Chapter 4 shows extensive oil and gas leasing and operations, there is no "quantitative assessment" of the impacts from these activities.
Overall, this DEIS's cumulative impacts discussion is very similar to the Final EIS deemed inadequate under NEPA in Great Basin Mine Watch v. Hankins. As such, BLM must prepare a revised DEIS (and may not proceed directly to a Final EIS) to correct these deficiencies, and the other errors noted in these comments.
Disposition: Comment acknowledged; does not provide new information

Response

Chapter 4 of the EIS includes a detailed discussion of potential cumulative impacts of the proposed action, and alternatives, considered together with other past, present and reasonably foreseeable future actions. Changes have been made to Chapter 4 in response to specific comments and in response to the BLM's continuing review of reasonably foreseeable future actions. No specific changes were made in response to this comment because it includes no specific information about projects or impacts.

Letter 858, Comment 51

Taken together, the significant, and in many cases unmitigated, damage to critical environmental, cultural, historical, and religious resources noted herein fails to comply with FLPMA's mandate that BLM "shall ... take any action necessary to prevent unnecessary or undue degradation of the lands." 43 U.S.C. § 1732(b). This is known as the "UUD" standard. As the leading FLPMA and mining federal court decision states, this duty to "prev ent undue degradation" is "the heart of FLPMA [that] amends and supersedes the Mining Law." Mineral Policy Center v. Norton, 292 F.Supp.2d 30, 42 (D.D.C. 2003).
FLPMA, by its plain terms, vests the Secretary of the Interior [and BLM] with the authority – and indeed the obligation – to disapprove of an otherwise permissible mining operation because the operation, though necessary for mining, would unduly harm or degrade the public land.
Id. "FLPMA's requirement that the Secretary prevent UUD supplements requirements imposed by other federal laws and by state law." Center for Biological Diversity v. Dept. of Interior, 623 F.3d 633, 644 (9th Cir. 2010).
BLM complies with this mandate "by exercising case-by-case discretion to protect the environment through the process of: (1) approving or rejecting individual mining plans of operation." Id. at 645, quoting Mineral Policy Center, 292 F.Supp.2d at 44. The Ninth Circuit has stressed the "environmental protection provided by the MPO [mining plan of operation] process." Center for Biological Diversity, 623 F.3d at 645 (emphasis in original).
BLM cannot approve a mining plan of operations that would cause "unnecessary or undue degradation." 43 C.F.R. § 3809.411(d)(3)(iii). BLM's mining regulations further require that all operations "must take mitigation measures specified by BLM to protect public lands." 43 CFR § 3809.420(a)(4).
As noted herein, BLM violated these overarching duties.
Disposition: Comment acknowledged; does not provide new information

Response

FLPMA and BLM's Surface Management Regulations (43 CFR 3809) require that a plan of operations prevent "unnecessary or undue degradation" and that term is defined in the regulations. The proposed Project, if approved, must comply with that standard and, as the comment states, the Operator must take mitigation measures specified by BLM to protect public lands. In reviewing the proposed Plan of Operations and preparing this EIS, the BLM has complied with its legal and regulatory obligations and it will comply with those requirements in any decision that is made. Specific concerns about compliance with the "unnecessary or undue degradation" standard are addressed in responses to comments related to specific resources. No changes to the text of the EIS have been made to address this comment.

Letter 858, Comment 52

The geochemcial sampling was not adequate, which has broad implications. Effective sampling is the bedrock of much of the analysis for the project from acid drainage to pit lake water quality development. For the Mt. Hope Project much of the analysis is thrown into question.

Disposition: Other (SEE RESPONSE)

Response

The management of waste rock is outlined in Section 2.1.3.2 of the EIS. The potential effects to water quality are discussed in Section 3.3.3 of the EIS. No changes to the text of the FEIS have been made to address this comment.

Letter 858, Comment 53

It is also possible that the conceptual basis for the pit lake model is incorrect, which is another foundation aspect to the analysis. GBRW is very concerned that the pit lake could go the way of the Lone Tree pit lake.
There are two major points of error surrounding the water modeling that the BLM must consider in order for the DEIS to be a complete disclosure document. These pertain to dewatering rates and the extent of drawdown around the pit lake and to whether the pit lake will be a terminal lake.
The DEIS estimated unrealistically high recharge rates on siliclastic rock on the Roberts Creek Mountains. Doing this caused conductivity to be significantly higher than in similar rock near the pit. The combination of high recharge near the massif and low conductivity near the pit prevents the drawdown from extending far north into the massif. The low conductivity near the pit lake limits the estimated dewatering rates at the mine; if the conductivity at the pit were as high as near the Roberts Creek Mountain massif, the dewatering rates could be much higher.
The pit lake may fill faster than the groundwater levels around the pit may recover. This is because the majority of the inflow is storm runoff from the pit walls. The BLM must present and analyze more simulated data to make a better estimate.
Disposition: Comment acknowledged; does not provide new information

Response

CC-098-Recharge in the Model

Letter 858, Comment 54

The DEIS admits that the Project will have significant, long-lasting, and in some cases permanent adverse impacts to water resources, including the loss or elimination of perennial and/or seasonal streams and numerous springs and seeps due to the Project's dewatering. See DEIS Chapter 3. BLM thus violated its duty under FLPMA to prevent "undue degradation" to these waters. The DEIS, however, states that its "mitigation measures" will be "very effective" in eliminating any adverse impacts. For the dewatering impacts during the Project, much of the "mitigation" is merely a plan to develop future mitigation (DEIS pp. 3-86 - 3-104). That violates BLM's duties under NEPA. See South Fork Band Council v. Dept. of Interior, 588 F.3d 718, 728 (9th Cir. 2009)(BLM EIS contained an "inadequate study of the serious effects of É exhausting water resources.").
Further, BLM has even less mitigation for post-closure impacts from dewatering, since the primary mitigation measures for impacts during the Project's 40+ years will not be available.
"For any significant impacts to wells with associatedground water rights that do not occur until after the end of mining and milling operations, the operational measures described above may not be available," (DEIS pg. 3-104). Here, BLM posits that mitigation could include speculative actions such as EML's purchase of water rights, drilling deeper wells, or posting a bond (DEIS pg. 3-105). But this does nothing for public water rights, such as Public Water Reserve (PWR) #107, as well as the public land springs, seeps, and streams that don't rely on wells. Thus, there is little, if any, mitigation either analyzed or proposed, for the post-closure impacts that will occur. Relatedly, there is no analysis of the effectiveness of this post-closure mitigation.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 858, Comment 55

Regarding PWR 107, the DEIS admits that many could be affected, but have yet to be quantified or analyzed. "Additional … and future PWRs that are reserved for stockwatering (and domestic) purposes could exist within the Project Area and within the ten -foot ground water drawdown contour," (DEIS pg. 3-57). BLM thus failed its duty to analyze these public rights under NEPA, and failed to protect them under its PWR 107 duties. Further, the DEIS limits any potential PWRs to 1,800 gpd (DEIS pg. 3-77), yet fails to explain why such springs/waterholes with less flow can be ignored.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 858, Comment 56

Overall, GBRW submits that the shortcomings of the DEIS warrant the development of as new DEIS or supplemental EIS.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 859

Comment 1

We are particularly concerned with its insufficient analysis of the full impact mining operations would have on grazing resources
Disposition: Other (SEE RESPONSE)

Response

Section 3.12.3 of the EIS discusses the potential effects to livestock grazing. No changes to the text of the FEIS have been made to address this comment.

Letter 859, Comment 2

unsatisfactory mitigation plan for lost resources
Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 859, Comment 3

Please include us on the mailing list for all information related to this project.
Disposition: Other (SEE RESPONSE)

Response

The contact has been added to the mailing list.

Letter 859, Comment 4

Additionally, please place on the mailing list our attorneys and range consultants
Disposition: Other (SEE RESPONSE)

Response

The contact has been added to the mailing list.

Letter 859, Comment 5

Because of these impacts, should the Project proceed, the BLM must adopt a monitoring, management, and mitigation plan that will promptly, reasonably, and effectively mitigate these impacts.
Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 859, Comment 6

The BLM should require mandatory coordination between the Project owner, stake holders (including Etcheverry), and public agencies when addressing monitoring, management and mitigation
Disposition: Other (SEE RESPONSE)

Response

The BLM does not have the regulatory authority to mandate an independent third party or other public agency to coordinate with the Project proponent.

As part of the applicant committed practises outlined in Section 2.1.14 of the EIS, EML has committed to keeping Eureka County informed on the activities at the mining operation.

No changes to the FEIS have been made to address this comment.

Letter 859, Comment 7

A minimum amount of funding should be required to address these impacts as they arise.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 859, Comment 8

The final EIS ("FEIS") must explicitly identify the applicant, or EML, as the responsible party responsible to address and implement mitigation. This responsibility includes all aspects of mitigation including designing, surveying, reporting, obtaining permits, undergoing additional NEPA compliance, operation, maintenance, insurance, construction, monitoring, and ensuring that mitigation measures arc reasonable and adequate to mitigate the impact.
Disposition: Other (SEE RESPONSE)

Response

A Record of Decision is the document that would be used to require EML to implement any specific mitigation measures related to the project.

Letter 859, Comment 9

EML must provide short-term mitigation for impacts as the affected party or resource will only suffer continued additional or compounded injury during the lag time of the action that triggers mitigation and the implementation of the mitigation measure itself
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 10

Further, some flexibility must be considered regarding mitigation as not all mitigation measures will be feasible and thus alternative means of mitigation will need to be considered and implemented.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 11

The BLM should require monitoring, management, and mitigation plans for any decisions made related to this Project.
Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 859, Comment 12

The BLM should require a strict monitoring, management and mitigation plan that will effectively address impacts caused by the Project.
Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 859, Comment 13

DEIS Section 2.1.1 discusses ancillary facilities for the Project, including "fresh/fire suppression water storage and a process water storage pond" (p. 2-2; PDF 85, ¶12). Does EML have water storage permits to allow construction of the proposed storage facilities? If not, will EMLI apply for such permits? The FEIS must consider whether or not EML will have valid water permits for all its purported uses of water.
Disposition: Already addressed in planning documents

Response

Section 1.6 of the EIS lists the permits that would be required for the Project to operate. No change to the EIS has been made in response to this comment.

Letter 859, Comment 14

DEIS Section 2.1.2 discusses ground water management and water supply (p. 2-17; PDF 94, 112). Does the 11,300 acre feet per year ("afa") amount of water required, include that amount of water from the well field and mine dewatering, as well as the reclaimed, recycled, and collected runoff water? It is not clear from the DEIS whether or not EML has obtained water permits for all of these sources. If EMI, plans to use water from all such sources identified, can the total amount of fresh water consumed be reduced to account for use of reclaimed, recycled, and runoff water? The FEIS must consider EML's water uses and take into account all valid water permits available, the permitted amount, and the amount of water required for each and every use of water proposed in the Project.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 15

DEIS Section 2.L2 states that 11,300 afa of water will be necessary during the operation of the mine, 44 years (p. 2-17; PDF 94,112). The paragraph also states that some water will be needed during the reclamation phase. The DEIS does not consider how much water will be necessary and from which sources the water will be appropriated. Where will the water come from? how much water will be requested from each source?
Disposition: Comment acknowledged; does not provide new information

Response

CC-075-Water Use in the Proposed Action

Letter 859, Comment 16

How long after the closure of the mine will water continued to be used to support mitigation, the pit lake and other items requiring water used by the Project? (Appendix B, p. 2 111; PDF 935, , 118). The DEIS does not list or inventory all water uses, and time periods of water use. The FEIS must consider EML's water uses from all sources and for all years wherein EML contemplates any water use for its Project, mitigation, or rehabilitation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 17

The DEIS does not discuss an annual account of water use by EML under the proposed action. The DEIS only considers a total amount of 11,300 afa to be 100% consumptively used. Will the amount of water consumed during construction phases, and that consumed after active mining phases, be at an amount less that 11,300 afa? If so, will this water be made available for mitigation? Please include a water inventory accounting in the FEIS.
Disposition: Comment acknowledged; does not provide new information

Response

CC-075-Water Use in the Proposed Action

Letter 859, Comment 18

The DEIS generally considers that water resource damage (both surface water and ground water) can be mitigated. With what water will EML satisfy mitigation when EML may only be permitted to use 11,300 afa, which it appears will be used in full for mining operations? The FEIS should consider specifically how EML will satisfy mitigation requirements.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 19

DEIS Section 2.1.2.1 contemplates that if there is surplus water, then water in the pumping Field would be reduced. The DEIS does not consider how or which wells in the field would be reduced or curtailed (p. 2-17; PDF 94,1f3). Is there a hierarchal list that illustrates which wells would be shut down first, second, third, etc.? How is such determination made? The DEIS does not consider that some wells will cause greater impacts to water right holders other than EMI, given the proximity of the well head to the others' properties. The FEIS, as well as any decision document, should consider with specificity, how, where, when, to what amount, and for what duration each well in the pumping field would be reduced (whether due to surplus, or due to required mitigation).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 20

DEIS Section 2.1.2.1 notes that well locations may change over the life of the Project (p. 2-17; PDF 94,1[4). The DEIS does not discuss or contemplate that any change in well location requires that a transfer or change application be filed with the Nevada State Engineer. During a change application process, the change can be protested by an aggrieved or injured party, and the Nevada State Engineer could deny such requested change. If these processes were to occur, EML's water rights of use would be in jeopardy and the

Project's total pumping may be reduced. Does the DEIS consider a proposed action wherein an amount less than 11,300 afa is contemplated? An alternative to the proposed action discussing water use less than 11,300 afa should be considered and outlined in the FEIS.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-021-Water Development Plan

Letter 859, Comment 21

Given testimony in the State Engineer Proceedings, likely no amount of water should come from the carbonate aquifer in the well field as aquifer tests and EML's own witnesses show that pumping of the carbonate aquifer will cause immediate and negative impacts.
a. In the well field, Well 206 draws from a carbonate rock aquifer with relatively high transmissivity. EMI, conducted a 32-day constant rate aquifer test on Well 206 from April 10 to May 12, 2008, at a target pumping rate of 1,400 gallons/minute. Observed drawdown in Well 206 reached 30 feet at the end of the pumping test. See Record on Appeal from State Engineer Proceedings at ROA 18052. Static water levels in the aquifer did not return to pre-testing levels and a residual drawdown of 4.5 feet was observed. Based on the "conservative" pumping of Well 206, EMI,'s scientific analysis indicates that there will be a 205 foot drawdown at the end of the mine's 44-year pumping period. See Exhibit 39 ROA 1716. EML's expert admits that pumping over time will cause impacts to multiple springs and stock watering wells on the floor of Kobeh Valley. See Transcript at ROA 187:7-16.
b. Well 206 is uniquely situated and located within roughly 75 feet of the property line boundary of a private ranch, Roberts Creek Ranch, owned by Etcheverry. Following EML's pump test of Well 206 in 2008, the Etcheverry Family observed that water levels in nearby Nichols Springs were cut by half and have never fully recovered. See Transcript at ROA 448:16 449:22, 456:8 — 458:3.
c. Martin Etcheverry testified during the State Engineer proceedings that by the time EML was done testing Well 206, Nichols Springs dropped to half the water and has not yet recovered, years later. ROA 448:16-35, 449:17-22, 456:8 - 458:3. EML's witness, Jack Childress, acknowledged that the net effect of Applicant's proposed pumping from Well 206 will be to "dewater" the carbonate block that houses Well 206. ROA 258:25 - 259:2.
Disposition: Comment acknowledged; does not provide new information

Response
EML has proposed pumping a small portion of the water from the carbonate aquifer and the modeling and analysis in the EIS are based on this proposal. EML has monitored Nichols Spring for several years. The data show that flow dropped over a period from early 2007 to early 2011, but the onset of this decreased flow preceded the 206T pump tests by 3 quarters. In addition, during the course of the pumping test, Nichols Spring had a temporary weir installed to measure spring discharge, and there was no reported change in spring flow during the course of testing (Bugo, 2008). EML's data disagree with Etcheverry's testimony."; The NDWR has granted EML their water rights for the Project. EML has proposed pumping a small portion of the water from the carbonate aquifer and the modeling and analysis in the EIS are based on this proposal. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 22

The FEIS should note the affects of removing water from the carbonate block and consider alternatives that do not take water from this source near Well 206. The impacts seen from pump tests related to this Well are significant.
Disposition: Comment acknowledged; does not provide new information

Response
The EIS describes the difference in pumping responses that would be expected, and have been demonstrated by EML's well tests, from the carbonate and alluvial aquifers. The Project would limit carbonate pumping to no more than ten percent of total water production from the Kobeh Valley wellfield. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 23

DEIS Section 2.1.2.1 notes that "any change in number of wells or location of wells outside the corridor shown on Figure 2.1.7 would be considered.. .a modification of the plan... subject to.. .environmental review" (p. 2-18; PDF 95,11[1). Is this statement saying that if the number of wells exceeds the 8-15 contemplated, regardless of the location of the well, that it would be a modification of the plan subject to additional federal NEPA review?
Disposition: Other (SEE RESPONSE)

Response
Yes, the Plan of Operations would need to be modified and the BLM's review of the Plan of Operations would be subject to BLM compliance with the NEPA.

Letter 859, Comment 24

From a review of this language it also appears that this statement may be saying that an increase is not necessarily a modification if the well locations remain within the contemplated corridor. If this latter assessment is the case, what point or number of additional wells,

would trigger a modification subject to additional review? The FEIS should state with specificity which conditions and circumstances would require an additional review process.
Disposition: Already addressed in planning documents

Response

Section 2.1.2.1 of the DEIS outlines the proposed activities associated with the water supply development, which includes eight to 15 wells to be located within the identified corridor. If more than 15 wells would be needed or the wells would need to be located outside of the identified corridor, then the Plan of Operations would need to be amended. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 25

DEIS Section 2.1.2.1 identifies two construction water wells placed on a separate pipeline to transport water to a construction pond (p. 2-18; PDF 95, 113). a. The paragraph continues to note that water would be used at 300 gallons per day. Is this 300 gallons per day the amount of water being pumped out of the well? Is this amount of water taken from these wells a portion of the 11,300 afa contemplated by the Project or in addition to that amount? The FEES should include an accounting of water uses to ensure that the amount of water used in each component of the Project does not exceed the total amount of permitted water uses that EML holds.
b. In addition, it is unclear from the DEIS where this water is being used. The narrative states it will be used in the TSF ponds, but Figure 2.1.8 does not identify the location of such ponds. There are only four ponds on this figure and none of them are identified as TSF or Construction Ponds. Does the DEIS contemplate that this water from wells located in Kobeh Valley will be used in Diamond Valley or another hydrographic basin? What are the affects of moving this water to different water basins? The FEIS should consider the direct and indirect impacts related to the comingling of water use and water basin uses.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 26

DEIS Section 2.1.2.2 outlines mine dewatering with an estimated 100-750 afa of water inflow in year one, 20% being from Kobeh Valley and 80% from Diamond Valley (p. 2-18; PDF 95, 115). a. The DEIS fails to consider the affect of removing water from Diamond Valley wherein ground water is already in a state of decline. Given that Diamond Valley's ground water is already over appropriated, the FEIS must consider and explain that the use of Diamond Valley water will cause irreversible and irretrievable commitment of the water resources, thus significantly and negatively impacting every water user in Diamond Valley. Because of the use of Diamond Valley ground water — the zone of impact from this Project extends to every surface and ground water user in Diamond Valley and therefore must be considered as such in the FEIS.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 859, Comment 27

Will the non-fresh water removed from the dewatering activities be put to beneficial use? The FEIS needs to identify the beneficial use of each molecule of water being used in the Project to ensure that the water resources are not wasted.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 28

The DEIS states that the fresh water will be used, but does not consider the use of the non-fresh water, yet states in DEIS Section 21.14.3 that the facility will be a zero discharge facility (p. 2-66; PDF 132 ¶3-5). Where is this water going? The FELS must account for and consider the use and impacts of all water being used in the Project.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 29

DEIS Section 2.1.2.2 notes that water removed from the open pit will be used to offset fresh water demand. The DEIS fails to consider and account for how much the water collected from the open pit will offset the demand for fresh water (p. 2-19; PDF 96,1[1).
a. How much fresh water can be saved? And how is "fresh water" defined? The FEIS must consider the accounting of all consumptively used water. The FEIS must consider whether or not this water is actually "saved" or if the source of the total Project

waters are simply shifted during the time that water is removed from the open pit mine. The FEIS must consider that regardless of whether the water comes from the well field or from the open pit mine, that water must have a permit to be used for consumptive use.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 30

The DEIS should be edited to take out the word "saved" from anything related to water use given that the Project will consumptively use every drop of water it comes into contact with. See ROA 1065 EML's proposed Mt. Hope Water Resources Monitoring Plan117 noting "no water will be returned to the aquifer."
Disposition: Other (SEE RESPONSE)

Response

The word "saved" is not used in the DEIS. No changes to the text of the FEIS have been made to address this comment.

Letter 859, Comment 31

Which wells will have their pumping reduced or curtailed when water is flowing into the open pit? Will there be a method for determining which wells cause the most impact, and shutting down production from those wells if water from the open pit is available to offset the fresh water demand? The FEIS must consider which wells should be considered for reduction or curtailment when water is being utilized from the open pit. Further, any decision document allowing this Project to proceed should carefully consider this scenario as a means and time for mitigation to existing water uses.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 32

DEIS Section 2.1.2.2 states that water is estimated to flow into the mine pit at a rate of 100-750 afa. The DEIS does not consider the effect on water quality as a result of fresh ground water flowing into the open pit mine (p. 2-18; PDF 95 ¶5). a. How will water quality be affected? The FEIS must consider the effects on water quality. Specifically, EML cannot guarantee that the ground water tables will not comingle with a) the open pit and mining operations therein, and b) other ground water tables. The FEIS must consider how the ground water exposure to the open pit will affect water quality.
Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 859, Comment 33

The FEIS must consider the geology of the ground water tables that may be, or are likely to be, connected to the ground water tables intercepted by the open pit mine. If such ground water tables are connected to the same tables that other water users use, including domestic water supplies, ground water quality must be highly and continuously monitored to ensure no contamination or degradation occurs.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 34

How will EML mitigate the downgraded water quality? The FEIS must consider the significant effects of the open pit on ground water quality when determining reasonable and effective means to Project the water quality through mitigation. The FEIS must consider all of the water tables and water quality effect on each table and how that water quality will be protected.
Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 859, Comment 35

Will EML compensate other water users for degraded water quality? The FEIS must consider effective means to monitor and mitigate damage to degradation of ground water quality. Any decision document must require mitigation, including compensating water users for such degradation.

Disposition: Comment acknowledged; does not provide new information

Response

As outlined in Section 3.3.3.3 of the EIS, no degradation of water quality is anticipated, after implementation of mitigation. Therefore, no unmitigated degradation to water quality is anticipated. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 36

The DEIS does not explain how successful the design will be for its intended reduction or infiltration goal. Were other designs considered to reduce infiltration? The FEIS should outline the measures of success and statistical information used to support the "success" of the design chosen.
Disposition: Other (SEE RESPONSE)

Response

Attachments B and C to Appendix 4 of the Plan of Operations contain the testing, modeling and other technical information associated with the PAG WRDF cover design.

Letter 859, Comment 37

Will there be an effect to water quality from infiltration of the PAG WRDF materials? If so, how large of an effect? The FEIS should outline how the steps and the design/system chosen to reduce infiltration will protect water quality. The FEIS should further outline the probability that water quality will be protected given the steps, design, and system chosen.
Disposition: Other (SEE RESPONSE)

Response

The Proposed Action and Appendix 4 of the Plan of Operations provides the Waste Rock Management Plan for the proposed Project.

Letter 859, Comment 38

DEIS Figure 2.1.10 (PDF 101) depicts drainage for a spring under the WRDF, but then states that the design is "conceptual." The inclusion of a spring and drain is part of the design proposed in DEIS Section 2.1.3.1.2 (p. 2-24; PDF 99, ¶6). Will there be a spring drainage system, or not? If not, how will the percolating waters be controlled? The FEIS must consider and outline the uncertainty of this conceptual design and state whether or not such design will be used. If this spring drainage system will not be used, the FEIS must consider the effects of the non-use, including how the percolating waters will be controlled and any impacts of uncontrolled waters. Given the uncertainty, this is an area wherein the FEIS and decision documents should require a high level of monitoring, management and mitigation.
Disposition: Comment acknowledged; does not provide new information

Response

The location of the spring drainage system would be constructed as shown in the Plan of Operations and in the Proposed Action in the EIS. The use of the word conceptual is appropriate. The final design would be developed prior to construction. No change has been made in the EIS in response to this comment.

Letter 859, Comment 39

DEIS Figures 2.1.9, 2.1.11, 2.1.12 and 2.1.13 (PDF 100, 102, 103, 104) identify locations of numerous springs The FEIS should explain the purpose or use of these springs related to the proposed mining operations. If these springs are identified for the purpose of determining impacts to surface water sources, the FEIS should explain what impacts it foresees, both direct and indirect, to each spring. The FEIS should identify a baseline condition for each spring and describe how it will be monitored. If the Project will have a significant effect on the streams associated with these springs, including reduction in or complete cessation of stream flow, the FEIS must consider and call for mitigation to each and every stream.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 40

DEIS Section 2.1.5.1 outlines a water spray system used for dust suppression at the dump pocket hopper (p. 2-38; PDF 108,1f3). The DEIS does not discuss what the source of water will he for this phase of processing. Will fresh water be used? Or, will reclaimed or recycled water be used? How much water is anticipated for this phase? The source and amount of water to be used for this system must be accounted for and should be outlined in a water use inventory in the FE1S.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 41

DEIS Section 2.1.6 notes that water from the impoundment will continually be recycled back into the process stream during operations (p. 2-45; PDF 113, ¶6). The DEIS does not consider the specific effect that water recycling will have on the amount of fresh water used. Will water recycling reduce the 11,300 afa of fresh water identified in DEIS Section 2.1.2 (p. 2-18; PDF 95 115), or will the recycled water be used in addition to the 11,300 afa? The FEIS should account for this water.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 859, Comment 42

DEN Section 2.1.14.3 (p. 2-66; PDF 132,1f3) explains that the central method used for identifying waste rock with the potential to generate acid or mobilize deleterious constituents would be laboratory analysis. However, DEIS Section 2.1.3.2.2 states that prior to implementation of the laboratory testing method, a "visual inspection of the waste rock" would he conducted to separate PAG waste from non-PAG waste (p. 2-36; PDF 106 117).
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-074-Visual Inspections of Waste Rock

Letter 859, Comment 43

The DEIS fails to adequately consider the consequences that will occur before laboratory testing is implemented, including consequences to water resources from seepage of PAG material percolating into the water.
Disposition: Other (SEE RESPONSE)

Response

Laboratory testing is proposed for all waste rock prior to disposal. No change to the text of the FEIS has been made to address this comment.

Letter 859, Comment 44

The DEIS fails to outline who, and upon what expertise, the visual inspection will he made. how will the visual inspection process ensure that all PAG waste is separated from non-PAG waste? The DEIS does not address the impacts related to human error or "visual inspection" errors that may occur.
Disposition: Factual correction made (SEE RESPONSE)

Response

CC-074-Visual Inspections of Waste Rock

Letter 859, Comment 45

Given the uncertainty, this is an area that the FEIS should consider for strict and continued monitoring to ensure that all PAG waste is handled properly.
Disposition: Other (SEE RESPONSE)

Response

The BMRR has responsibility for ground water protection in the State of Nevada and will require an appropriate level of monitoring pursuant to the Water Pollution Control Permit. No change to the text of the FEIS has been made to address this comment.

Letter 859, Comment 46

DEIS Section 2.1 15 (p. 2-70; PDF 136,1[4) incorporates the Water Resources Monitoring Plan ("WRMP"), attached to the DEIS as Appendix B. The WRMP, Paragraph 3 (Appendix B, p. 1; PDF 934, 113), states that mitigation may be required based on the degree of impacts, but does not identify the elements or thresholds requiring mitigation. What will those elements and thresholds be? What mitigation activities will be required? Who will be responsible for conducting mitigation? Who will ensure that the responsible party actually and adequately mitigates? The FEIS should address these questions with specificity to allow understanding of thresholds, mitigation activities, and responsibility.
a. The FEIS must take the WRMP one step further by outlining: the type of impacts that will likely be seen, the degrees of impacts, the elements and thresholds for mitigation, what reasonable and adequate mitigation will be, how long mitigation will be required, when mitigation will occur (immediately or upon some group consensus, petition by damaged party, administrative hearing, etc), cost of mitigation and responsibility for costs, and the party to implement alternate mitigation measures in case mitigation does not work.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 47

The WR_MP Paragraph 7 (Appendix B, p. 1; PDF 934,117), incorporated in the DEIS by DEIS Section 2.1.15, contemplates a Technical Advisory Panel ("TAP"), but fails to explain any details about TAP. Who will make up the panel? What authority will TAP have to control mine operations and mitigation? How will TAP consider comments from stakeholders?
a. In the DEIS, the TAP is merely contemplated. The FE'S should state that a TAP will be required by BLM should this Project proceed. Any decision document should also require creation of a TAP.
b. The FEIS should outline who will create the TAP and upon what expertise. The TAP should include members of Eureka County as well as the stakeholder or landowners in the County who are most likely to be affected by EML's mining activities.
c. The FEIS must outline the authority of the TAP and if any procedures will be required to be followed by the TAP. The FEIS should consider how TAP will consider comments from the public, injured persons, or any stakeholder. The FEIS should further outline how the TAP will handle any comments and implement any action the TAP determines should be taken.
d. The FEIS must outline procedures or a jurisdictional body that will oversee any decisions made by the TAP.
Disposition: Other (SEE RESPONSE)

Response
Please see Item #7 of the Water Resources Monitoring Plan in Appendix C of the EIS, which is EML's proposal water monitoring from the Plan of Operations, for a description of the Technical Advisory Panel as proposed. As stated therein, the intent of the TAP is to provide stakeholders with "access to hydrologic monitoring data" and to provide a "venue to bring forth their comments and concerns". The Water Resources Monitoring Plan does not propose to vest the Technical Advisory Panel with any jurisdictional authority. In fact, the Water Resources Monitoring Plan suggests that neither EML nor the BLM can manufacture such authority. No change to the text of the FEIS has been made to address this comment.

Letter 859, Comment 48

The WRMP Paragraph 8 (Appendix B, p. 2; PDF 935, Ill), incorporated in the DEIS by DEIS Section 2115, discusses ground water use extraction, noting that 11,300 afa are proposed, with the majority coming from Kobeh Valley, and the remainder coming from Kobeh and Diamond Valleys through pit dewatering operations. The DEIS is not clear about whether pit dewatering operations would provide additional water or be within the 11,300 afa. Is water that will come from pit dewatering operations in addition to or included within the 11,300 afa figure? The FEIS should provide a water inventory from all sources. Given the irreversibility of water use and 100% consumptive use of water resources proposed, any FEIS and decision document should detail the use and inventory of all waters while providing a plan to monitor water use to ensure that no more than 11,300 afa (or that amount of water permitted for use) is actually used.
Disposition: Factual correction made (SEE RESPONSE)

Response
CC-021-Water Development Plan

Letter 859, Comment 49

The WRMP Paragraph 8 (Appendix B, p. 2; PDF 935,111), incorporated in the DEIS by DEIS Section 2.1.15, states that the majority of the pit dewatering water will come from Diamond Valley. DEIS Section 2.1.2.2 stated that it is predicted that 100-750 afa is expected to flow into the open pit for a period of at least 32 years. (p. 2-18; PDF 95 115). Is EML procuring state permits for using dewatering water? What effects will there be in Diamond Valley as a result of the inflow of water to the open pit from Diamond Valley, especially since Diamond Valley is already experiencing ground water overdraft?
Disposition: Other (SEE RESPONSE)

Response
NDWR is responsible for water appropriations in the State of Nevada and can be contacted regarding questions about the permits granted to EML. No change to the text of the FEIS has been made to address this comment.

Letter 859, Comment 50

What mitigation measures will be used to make sure these impacts do not occur, or mitigate their occurrence? The DEIS is clear that significant impacts will occur under the proposed action. The context and intensity of the impacts is that which deems the impacts as "significant." Given the significance, the BLM should require mitigation in detail, and prior to any issuance of a decision document allowing this Project/proposed action to move forward. The mitigation plan should detail each measure to be taken and the timing of that measure. For example, if water ceases to flow in a stream, immediate replacement water is needed wherein that water is used for livestock watering. What will ensure that water is actually replaced immediately. The FEIS should consider and outline these mitigation measures with significant detail.
Disposition: Other (SEE RESPONSE)

Response
The specific mitigation for the potential impacts of the Proposed Action, as well as the alternatives is outlined under each resource section of Chapter 3 of the EIS. In addition, all the mitigation outlined for the Proposed Action is compiled in Appendix D of the EIS.

Letter 859, Comment 51

What are the thresholds for adverse impacts? There will be direct and indirect impacts related to this Project. The FEIS and any decision document, must outline the thresholds that will require immediate mitigation. The DEIS also contemplates that some impacts will last years, decades, centuries. In such instance, the FEIS and decision documents should require adequate mitigation that will adequately address the impacts over time.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 859, Comment 52

Why is a ground water drawdown of 10 or more feet significant when impacts can occur at less than 10 feet? The FEIS should require EMI, to consider and include all impacts occurring at a ground water drawdown of at least 5 feet.3
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 859, Comment 53

How are the locations of the "selected" springs chosen? Besides the springs themselves, how are the location(s) of monitoring places on that spring itself located? The FEIS needs to identify and state the reasons particular spring are chosen over others and where within that spring the monitoring point will be placed.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 859, Comment 54

Have these springs already been chosen? Has monitoring already begun? It is important that a baseline be established prior to any water use by EMI- The FEIS and any decision document should direct that monitoring be commenced at once to establish the base line.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 859, Comment 55

How will the testing periods be set? It will be important in any monitoring plan, that springs and surface waters are tested at the same time each year. Who will set the date for monitoring to occur, and who will monitor this activity to ensure compliance and reliability of results? The FEIS and final WRMP should outline these factors to ensure compliance, reliability, and comparability of results.
Disposition: Comment acknowledged; does not provide new information

Response
The BLM would require submittal of monitoring reports as a condition of Project authorization and would ensure that monitoring protocols are sufficient. No change has been made in the EIS in response to this comment.

Letter 859, Comment 56

Will the sites be tested while adjacent ground water pumping is occurring or when pumps are not operating? The FEIS needs to consider that these conditions will occur in the future and thus establish a base line. Monitoring should document whether or not wells are being pumped within a described radius of the monitoring site. Further, it will be important for result interpretation to know how long that particular well has been pumped. For example, results will vary dramatically if a nearby well has been pumped for two hours versus the same well being pumped for 24 hours or 2 years. The FEIS and monitoring plan should outline and delineate which factors should be documented when undergoing any monitoring activities to ensure that all impacts are considered and mitigated for.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-004-Baseline Data Adequacy

Letter 859, Comment 57

DEIS Section 12 discusses water resources and water quantity. The DEIS does not consider that many water uses may not be known or quantified. For example, Etcheverry Family LTD Partnership controls both private and public lands in Kobeh, Pine and Diamond Valleys wherein water is beneficially used, but may not be permitted under the laws of the State of Nevada. Many beneficial uses of water are exempt from permitting such as domestic uses, livestock water, and others. In addition, given the lack of water adjudications, Etcheverry has vested water claims on file with the State Engineer's office as well as the ability and proof to file for additional vested water claims. The FEIS must consider that these water uses are relied upon, are existing uses, whether permitted, exempt or vested, and are prior to many claims of EML. The FEIS must consider and account for these un-quantified water uses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 859, Comment 58

DEIS Section 3.2.1 (p. 3-3; PDF 165,113) states that Public Water Reserve 107 ("PWR 107") reserved for the public, that water necessary for domestic and stockwatering uses. Only water in excess of minimum amounts is available for appropriation. The DEIS does not consider the PWR 107 reservation. What is the minimum amount reserved for the public? Will the Project impact those minimum reservations? At what level will impacts be unacceptable? How will EML's activities be curtailed if there is an effect on reserved springs? What mitigation measures will EML be required to take? The FEIS should consider the effect of PWR 107 and address the impacts on minimum stream reservation requirements.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 859, Comment 59

DEIS Section 3.2.2.1 (p. 3-4; PDF 166,112) explains the study methods utilized for gathering baseline environmental information, and the time periods in which information was gathered. a. Were the years when data was gathered representative/average years, or was the quantity of water more or less than usual in those years? It is noted that some data was collected in the fall or on a quarterly basis, however, such month of collection needs to be documented.
b. What time of year was the data collected? If data was collected during the dry season, will that factor be taken into account for determining adverse impacts caused by the Project? The FEIS should include this information as the reader is unable to determine and ascertain impacts of the proposed action without this information. The time of collection needs to be consistent and stream surveys should be organized and specify how, when, where, and on what continued intervals data will be collected upon.
c. The FEIS must include the above outlined factors to allow the ability to adequately and reliably address impacts to affected landowners and water users. Should mitigation be required, establishing reliable baseline information is imperative.
d. The FEIS should specify how the study period ranked compared to the historic average in terms of climate and precipitation. The FEIS should specify whether the time frame "between 2005 and 2007" consisted of representative/average years or anomalies.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 859, Comment 60

The DEIS states, under section 3.2.2.1, that the final survey was conducted in the fall of 2007, but fails to identify the season of data collection for previous studies (p. 3-4; PDF 166,112). In SRK 2008a (Baseline Surface Water and Ground Water Report), collection dates are likewise unclear, but references are made to quarterly studies. Numerous collection dates are attributed to specific sites; however these dates are not summarized. Presumably, surveys were conducted four times per year at each survey site. This is not suggested in the DEIS. The DEIS implies that surveys were conducted at different locations at different times throughout the year. Water flow in springs and streams is highly dependent on season, annual precipitation, and climate. The DEIS does not consider how these factors may have influenced SRK's studies (p. 3-4; PDF 166,112).
a. The FEIS should identify the seasons/months of data collection. It is crucial that the PETS state clearly when and how often sampling was conducted at each site.
The FEIS should summarize the data, describing changes in water flow from season to season. If data was collected only during the dry season (summer/fall) at any site, the FEIS should also clarify this point and take into account differences in water flow levels throughout the year.
b. Mitigation should likewise consider seasonal water flow patterns and fluctuations. It should not be assumed that replacing water sources in the spring with flow levels requisite for fall will be sufficient for supporting riparian vegetation, wildlife, wild horses, and livestock use.
c. Without more detail concerning how water resources information was collected, interpreted and applied to mitigation measures, it is impossible for readers to determine and ascertain the impacts of the proposed action on water sources.

d. The FEIS must clarify how season and average climate and precipitation data relate to SRK's water resource information studies. The FEIS must delineate how these factors will be accounted for when determining landowner and water right holders' compensation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 859, Comment 61

DEIS Section 3.2.2.3.2 reports that a five-mile radius was chosen to survey springs and seeps near Mount Hope (p. 3-31; PDF 185,116). Why was the five-mile radius the chosen parameter? If the studies occurred within a five-mile radius, then were impacts outside of that radius not considered? Is a five-mile radius adequate for water studies? Do other reputable studies use similar parameters? In order to analyze the impacts of the proposed action this information is needed. EML, created a computer model to assist in determining Projected impacts of mining operations on water resources. Why wasn't this computer model used to determine the Projected zone if impact as opposed to creating an arbitrary five-mile radius? In order for the public and the NEPA process to adequately consider and address impacts, whether or not those impacts are direct, indirect, irreversible, irretrievable, significant, or non-significant, the best available information must be used. The FEIS should consider use of a larger radius than 5-miles or otherwise consider and use the model to predict the draw-down, drying up, and otherwise "dewatering" of the aquifer.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 859, Comment 62

DEIS Section 3.2.2.3.3 (p.3-38; PDF 191 113) denotes two impoundments under the interests of Etcheverry Family LTD Partnership including Alpha Ranch impoundment and Roberts Creek Ranch impoundment. The FEIS must consider the effects of the proposed action on these impoundments that service the grazing allotment and Etcheverry farming and ranching interests. The FEIS does not outline the impacts to these impoundments. The FEES does not outline mitigation triggers or methods that will be required should these impoundments be negatively affected by the proposed action.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 63

DEIS Section 3.2.2.6.1 (p. 3-40; PDF 193,111) outlines the hydrogeologic setting. This setting fails to consider effects of the proposed action to resources in Pine Valley. The "Diamond Valley Regional Flow System" is defined so as not to include Pine Valley, however the State Engineer recognizes that the Projects place of use incorporates portions of Pine Valley. Furthermore, Project maps showing the contours of a 10-foot ground water drawdown delineate effects to water resources in the Pine Valley hydrographic basin. The effects of the proposed action to resources in Pine Valley must be considered and analyzed in the FEIS.
Disposition: Comment acknowledged; does not provide new information

Response

The EIS does not exclude analysis or disclosure of effects to Pine Valley. However, the EIS correctly states that the Diamond Valley Flow System is considered to consist of Antelope, Diamond, Kobeh, North and South Monitor Valleys, and Stevens Basdin (Harrill et al. 1988). No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 64

The DEIS states that "all underground water rights and pending applications for underground water rights owned by EML or its subsidiaries were excluded from the assessment of potential impacts" (p. 3-57; PDF 207, It4). Therefore, the DEIS fails to consider impacts to underground water sources and water rights regarding those numerous applications. What are the Project's impact on underground water sources and underground water rights, including water rights and pending applications owned by EML? Why was this excluded from the DEIS analysis?
Disposition: Comment acknowledged; does not provide new information

Response

CC-010-EML Water Rights

Letter 859, Comment 65

The FEIS must include an analysis of the impacts from underground water uses by EML. It is clear that there will be adverse environmental effects from the use of underground waters. EML's water uses for the proposed Project are currently subject to litigation and are not in use at the proposed place of use and points of appropriation to affect water delivery to this Project. Thus,

EML's water uses as related to the Project are somewhat "new" uses as they were not part of a baseline condition in the zone of impact. The FEIS cannot exclude these impacts from analysis
Disposition: Comment acknowledged; does not provide new information

Response
CC-010-EML Water Rights

Letter 859, Comment 66

The State of Nevada, Water Resources Division only considers the use of water and does not consider impacts that go beyond injury to another water user based on the "downstream" consequences resulting from consumptive use, i.e. loss of forage. There are several impacts, including injury or water use taking away from another water user, caused by the this Project's use of underground waters that the State does not analyze. The FEIS must consider these impacts. Further, any decision document must properly be conditioned to mitigate any and all impacts caused by use of underground waters.
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Letter 859, Comment 67

The FEIS cannot exclude analysis of impacts caused by use of underground water. It is clear that there will be an irreversible and irretrievable commitment of the ground water resources from implementation of the proposed action, therefore these impacts must be discussed, outlined, and considered in the FEIS.
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Letter 859, Comment 68

Impacts that include "dewatering the carbonate block" are significant and must he disclosed to the public in the FEIS.4
Disposition: Comment acknowledged; does not provide new information

Response
CC-007-Regional Hydrological Model

Letter 859, Comment 69

f. It is clear from DEIS Table 3.2-6 that Etcheverry's interests as related to water will be impacted (p. 3-58; PDF 208). Etcheverry is listed as "owner" of five water permits that may be affected. Etcheverry relies on these water permits to sustain, from year to year, its agricultural and ranching operations. The effect of the proposed action on Etcheverry must be considered carefully. Further, mitigation measures relating to these water permits must be reasonable and adequate. Etcheverry would be willing to meet with the BLM to discuss and outline the water uses and effective means for mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 70

DEIS Section 3.2.3.1.1 determines that impacts are "significant" where the predicted ten-foot drawdown contour includes a spring, seep or stream, and where the surface feature is considered hydraulically connected to the aquifer affected by the drawdown (p. 3-63; PDF 211, 113). The DEIS fails to consider other impacts caused by drawdowns less than ten feet. Why is ten feet the deciding factor? How was the ten-foot standard determined? What are the impacts to areas that experience less than a ten-foot drawdown?
a. It appears that use of a ten-feet contour is suggested and not mandatory. It is not uncommon for the Agency to request a more narrow review of the predicted impacts when it appears such analysis is warranted. Here the impacts at ten-feet are significant, and thus, further review and inquiry using a five-feet contour is needed.
b. The FEIS must be drafted to outline the impacts shown using a 5-feet contour indicator to determine the effects of ground water drawdown.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 859, Comment 71

DEIS Section 3.2.3.1.2 also finds that impacts are "significant" for ground water resources and ground water rights when within the predicted ten-foot drawdown contour and hydraulically connected to the aquifer affected by the drawdown (p. 3-63, PDF 211, 115). The DEIS fails to consider other impacts caused by drawdown less than ten feet. Why is ten feet the deciding factor? How was the ten-foot standard determined? What are the impacts to areas that experience less than a ten-foot drawdown?
a. It appears that use of a ten-feet contour is suggested and not mandatory. It is not uncommon for agency to request a more narrow review of the predicted impacts when it appears such analysis is warranted. Here the impacts at ten-feet are significant, and thus, further review and inquiry using a five-feet contour is needed.
b. The FEIS must he drafted to outline the impacts shown using a 5-feet contour indicator for the effects of ground water drawdown.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 859, Comment 72

DEIS Section 3.2.3.3.1 and Impact 3.2.3.3-1 state that surface water resources will be affected by Project activities because surface disturbance causes erosion, and thus sediment to accumulate or severe down-cutting occurs within surface sources (p. 3-72; PDF 219, 1[1-4). The DEIS determines that the impact is not considered significant, but fails to consider factors or explain the reasoning for the determination. Please explain why these factors were not considered significant and outline those factors that led to the determination of "non. significance."
Disposition: Comment acknowledged; does not provide new information

Response

As stated in the EIS, during mine operation, standard erosion prevention and maintenance procedures (see Section 2.1.7.4) would reduce impacts to less than significant levels. Also, as stated in the EIS, permanent drainage alterations would be left in place and reclaimed using revegetation or rock lining for stability and elimination of long-term maintenance under post-closure conditions. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 73

DEIS Section 3.2.3.3.1 determines that any impacts to existing water rights on streams or springs "would be mitigated subject to NDWR jurisdiction" (p. 3-78/3-85; PDF 223/227). The DEIS fails to consider whether and how adverse effects will be mitigated. Rather, the DEIS assumes that effects will be mitigated. The FEIS cannot simply point to the State while the State points back to BLM on mitigation. Doing such cross-pointing so as to not consider mitigation will only guarantee that no mitigation will occur.
a. The State only has jurisdiction over water use, and not to impacts going beyond water use, such as contamination, water quality degradation, the irreversible lowering of the ground water table, impacts to exempt water uses such as stock watering from surface rights, and others. The FEIS and any decision document must retain jurisdiction and require mitigation compliance and enforcement to adequately address those impacts caused by EML use of water.
b. Further, it is important to realize that NDWR issued water permits pursuant to State Engineer Ruling 6127, which is currently on appeal to the Nevada District Court, Case Numbers CV1108-155 through CV1108-157, CV1112-164 through CV1112-165, CV1202-170, in Eureka County. No mitigation plan has been approved by NDWR to protect existing water rights.
c. The DEIS does not take into account that there are water uses beyond water rights. These uses include exempt uses such as stock watering on seeps and streams. Due to the lack of adjudication of the surface and ground water sources in these areas, there are likely several un-filed vested claims to all the seeps and streams in the Roberts Creek Grazing Allotment for stock watering.
d. Mitigation for impacts to existing water rights, existing water permits, and existing and unfiled vested water claims should be required by any decision document, and such mitigation methods and means should have been outlined in the DEIS to allow potentially impacted parties to review the mitigation measures and provide comment as to the adequacy, reasonableness, and effectiveness of the measures provided. Any decision document must require mitigation and have provisions to enforce mitigation measures, or to undergo alternate mitigation should the first mitigation measure tried not be successful.
e. Complete curtailment or turning off water use for EML should be included as a mitigation measure for consideration.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 859, Comment 74

The DEIS states that ground water will begin to recover in the open pit area and basin-fill and bedrock aquifers after pumping ceases (p. 3-78; PDF 223, '111-2).
a. Other areas in the document indicate that the ground water levels may not recover after dewatering ceases. The language "If there is insufficient water to support phreatophytes or aquatic-dependent species..." is repeated 25 times in the DEIS document (p. 3-367; PDF 485,117). DEIS Mitigation Measure 3.9.3.3-2 also states "Phreatophytic vegetation may re-establish once the water table has recovered (at least 100 years post mining and milling)" (p. 3-67 - 3-368; PDF 485, (118 - 486,111). b. The FEIS should clearly state

whether or not ground water levels are expected to fully recover. The FEIS should also be clear in stating when the recovery process is expected to begin, how long it will take, and to what extent the waters will be recovered.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-012-Recovery of Ground Water Levels

Letter 859, Comment 75

Please explain the baseline data in place that allows the BLM or those monitoring EML's Project to attribute reduced stream flows to mining operations. The FEIS must state in explicit values the thresholds that will trigger mitigation when reduction to stream flows occurs.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 859, Comment 76

If an affect to a surface water source for a period of time up to at least 400 years after the end of the mining and milling operations is "potentially significant," what period of time or amount of impact would raise the level of the impact to significant, requiring mitigation?
Disposition: Comment acknowledged; does not provide new information

Response

CC-037-Surface Water Impact Duration

Letter 859, Comment 77

The DEIS fails to outline how determinations will he made relating to the cause and effect of mining and milling by EML on reduced stream and spring flows in the affected zone of impact. The FEIS and any decision document must outline explicitly how much of a reduced flow will require mitigation, and what mitigation time period is reasonable to effectively mitigate the impacts.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 78

The FEIS should outline how the BLM considered the impacts of the proposed action and how those impacts, and specifically "at least 400 years" of impacts to surface water sources, relates to the sustainability of the resources, and the multiple use objectives of public lands.
Disposition: Comment acknowledged; does not provide new information

Response

CC-037-Surface Water Impact Duration

Letter 859, Comment 79

DEIS Mitigation Measure 3.2.3.3-2a states that EMI, would be responsible -for monitoring and annual reporting of changes in ground water levels and surface water flows prior to and during operations, and for a period of up to 30 years in the post mining and milling phase (p. 3-86; PDF 228, 1[5). Given that impacts are expected to last at least 400 years after the mining and milling operations, any monitoring, management, and mitigation should mirror this 400 year time period. Thirty years is grossly inadequate given the expected total cessation of stream flows, lowering of the ground water table and other "un-sustainable" impacts. The FEIS and any decision document allowing this Project to proceed should require present funding for future impacts up to 400 years past the mine life.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 859, Comment 80

DEIS Mitigation Measure 3.2.3.3-2b states that BLM would evaluate the information and determine whether mitigation is required (p. 3-86; PDF 228,117). Under these circumstances, how will it be determined if the necessary information is available; will BLM solicit information from potentially affected landowners/land-users? On what basis will BLM decide if mitigation is warranted; what are the specific factors?

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 81

DEIS Table 3.2-9 identifies the springs predicted to be adversely affected by the Project, mitigation triggers and plans (p. 3-87; PDF 229).a. In most cases the trigger or threshold requiring mitigation is "cessation of flow" or "reduction of hydrophilic vegetation." How were these triggers and thresholds chosen? Why are these factors the chosen triggers for mitigation? Did the drafters of the DEIS consider other mitigation alternatives and other trigger/thresholds to prompt mitigation requirements?
b. Impacts to the environment, the stream, livestock, wildlife, and other, are seen long before cessation in stream flows. To properly consider these impacts the FEIS must consider mitigation the impacts prior to complete cessation of flow. Mitigation measures must be triggered prior to drying up the stream or spring. Flows may be insufficient to support stock and wildlife below or the level of complete cessation, but the DEIS does not consider that situation. The FEIS must set thresholds for mitigation prior to the actual occurrence of negative impacts.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 82

c. The mitigation plan contemplates piping water to the affected location. This is not a reasonable means for mitigation in several instances.
i. Springs and streams are likely to be severely affected in elevations high in the Roberts Mountains wherein piping water will require use of pumps to ensure the water makes it to these higher elevations. What will ensure that water actually makes it to these elevations in sufficient quantity to properly mitigate stream and spring flows?
ii. From where and from what source will be water be piped'? If the water is being pumped from EML's well field, what will ensure that EML is not taking additional water from their already permitted water sources.
iii. Will EML be required to continue mitigation until the stream or spring returns to pre-Project levels? The DEIS contemplates that there will be affects to stream and spring systems for varying periods of time for up to at least 400 years after the end of the mining and milling operations. See DEIS Section 3.2.3.3.1 discussing Impact 3.2.3.3-2 (p. 3-86; PDF 228). Will EML be required to continue mitigation after mining and milling operations are complete? What will ensure compliance after these periods of time run? Due to the significant and substantial impacts, the FEIS and any decision document must require compliance and mitigation for all future lasting impacts beyond mine life. Arguably 400 years of impact can be considered a complete, irreversible and irretrievable commitment of the resources (the context and intensity of the proposed action is great). The FEIS must specifically state the effect of the proposed action on each of the streams and springs as a complete commitment of the water resources.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 83

EML may need to obtain additional water use permits to comply with mitigation measures. What are the impacts of additional water resources going to the mine or being diverted from other permitted uses? If EMI, plans to use its current water use permits, it will need to file change applications to change the type of use and place of use to effect mitigation. Given that the change application process with the Nevada State Engineer's office takes time to effect (see Nevada Revised Statutes, Chapters 533 and 534), and is subject to protest, what guarantees will be in place in a decision document to ensure that mitigation measures are timely acted upon? The FEIS should state that water required for mitigation purposes will come out of EML's 11,300 afa water allocation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-062-Mitigation of Diminished Water Flows

Letter 859, Comment 84

Why does the mitigation plan propose to cut off other wildlife uses? What will be the effect of limiting those water sources to large game only? The FEIS must consider impacts to smaller animals that cannot utilize water from guzzlers.
Disposition: Other (SEE RESPONSE)

Response

Table 3.2-9 identifies mitigation for impacts to surface water flows as a result of the Project not limited to guzzlers. Table 3.2-9 has been revised in the EIS to include additional detail. Replacement of surface water flows as identified in Table 3.2-9 of the EIS would not be limited to only big game.

Letter 859, Comment 85

In addition, the FEIS must consider the ability of a guzzler to support all the wildlife and stock that typically utilized the water from the stream and springs. What is the water production of guzzlers? Can guzzlers adequately water the amount of wildlife and stock that were watering from the replaced water source pre-Project? These impacts must be considered in the FE1S, and if mitigation is required, mitigation must be adequate.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 86

The FEIS should correct Table 3.2-9 to ensure that under mitigation all water sources retain their former function and usability. If this table is not corrected, the FEIS should clearly state the reason for limiting use to large game. Additionally, the FEIS should describe the effects of limiting water sources in this way.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 87

DEIS Table 3.2-9 (p. 3-87; PDF 229) contemplates that upon cessation of flow will be the trigger for mitigation, and that mitigation will be to pipe water anywhere from 0.1 to 8 miles away for amounts of water starting at 0.5 gallons per minute. Given that the time water is actually piped to the location where water has ceased to flow, will be several months at best, how is a half of a gallon per minute flow going to mitigate impacts when the stream and spring bed will already be dried up and the ground water table will have dropped, which means that this amount of flow will likely be absorbed directly into the creek, stream or spring bed and not continue to flow down stream? Mitigation must be reasonable and effective, and the DEIS does not consider these factors that will add to or compound the issues surrounding mitigation relating to the complete loss of water resources. This portion of the FEIS should be redrafted so that mitigation occurs prior to a complete loss of the water resource.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 88

Thus, it appears that while there will be significant impacts to these Creeks, mitigation will not occur unless a) there is a cessation of flow, and b) cessation of creek flow is coincident with a reduction in ground water levels. The DEIS fails to consider the need for mitigation in instances where there creek is impacted by the proposed action regardless of lowering of the ground water level.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 89

There is potential that these creeks will cease to flow prior to any determination of ground water lowering, especially ii EML will not consider the effects of ground water lowering less than 10 feet. To comply with NEPA, the FEIS must consider impacts, and assuming that impacts will not occur until there is a lowering of the ground water table of 10 feet or more, grossly underestimates the impacts that the propose action will cause. The FEIS must address impacts to these creeks, as well as require mitigation for any reduction in flow that would not otherwise be seen in the creek system. Any impact as a result of the proposed action must be considered.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 90

Cessation of flow coincident with reduction in ground water is not a sufficient mitigation trigger for Roberts Creek and Henderson Creek. These creeks normally have 6,825 gpm and 2,904 gpm flow rates respectively. According to Table 3.2-9 some of the impacted streams only have a flow of 1 or 2 gpm and will be mitigation upon cessation of flow. however, it is illogical and unreasonable to require complete cessation of flow to a stream system that generally flows at 6,825 gpm prior to any mitigation taking affect. The FEIS must redraft its mitigation plan to effectively mitigation losses to Roberts and Henderson Creek upon a reduction to the stream flow, or upon a ten percent reduction in stream flow. Complete loss of flow prior to mitigation is not effective, practicable or reasonable.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 91

Waiting for complete cessation of flow to Roberts Creek and Henderson Creek until mitigation will be triggered is detrimental, impractical and will result in significant and irreparable harm. The DEIS fails to consider the factors involved and the lapse of time from the triggering event requiring mitigation, and the implementation of the mitigation measure itself. For example, in order to implement the mitigation of a pipeline to carry 600 gpm to 6,500 gpm (see Roberts Creek Contingency Mitigation Plan in the Table (p. 3-96; PDF 238)) the following considerations are required: rights-of-ways from the BLM would be needed and thus because of the Agency action, NEPA compliance would again be invoked; rights-of-ways would require provision of funds to BLM for the permit; depending on the location of the pipeline and types of land it would cross, consideration of cultural resources, land status, wetlands, environmentally sensitive areas, etc. would need to be addressed; surveying would be is needed to determine route location; the impact of surface disturbance for above and below ground pipelines would need to be considered; contracting to install the pipeline; operation and maintenance costs of the pipeline; temporary mitigation measures would need to be designed and developed, change application on the water use permits would need to be filed and approved; and the list goes on. All of these items take time and money which should be paid by EML. Further, given that the time between the mitigation triggering event and mitigation implementation is likely years, temporary mitigation measures need to be implemented to place water in the creek, stream, or spring channel before the delay of long-term mitigation measures causes irreparable harm.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 92

How does the elimination of natural flow in perpetuity comply with ELM multiple use and sustainable use objectives for resource management?
Disposition: Comment acknowledged; does not provide new information

Response

The analysis of effects to seeps, springs, and streams in this section of the EIS does not indicate that the impacts would continue in perpetuity. No change has been made in the EIS in response to this comment.

Letter 859, Comment 93

The I-7EIS should consider alternative means to carry out the proposed action that do not completely eliminate sources of water?
Disposition: Comment acknowledged; does not provide new information

Response

CC-071-Alternatives to Water Use

Letter 859, Comment 94

How are the historical uses and yields determined in the DEIS at p. 3-99; PDF 241,114? Historic yield" can imply different values depending on whether the data is derived from long-term data collection or a recent short-term study. If the SRI((SRK 2008a) studies are used, the FEIS should consider whether or not the values in the SRK studies are adequate to determine "historic yield".
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-004-Baseline Data Adequacy

Letter 859, Comment 95

The FEIS and any decision document must address the long term impacts and "significance" of eliminated flows in perpetuity to the natural resources. Alternate mitigation measures, and/or alternate proposed actions, must be considered wherein the total elimination of water resources does not occur.
Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 859, Comment 96

The DEIS states, under Mitigation Measure 3.2.3.3-2c, "If the BLM determines that the Project impacts perennial stream segments or springs" after the Project is finished, one of two mitigation measures will be required (p. 3-99; PDF 241, li4).
a. The first mitigation measure requires "installation of a well and pump at affected stream or spring locations to restore historic yield..." The current wording of the DEIS requires only that a well and pump be installed, not that the well and pump restore the historic yield. The DEIS also fails to identify who will be responsible for maintaining these improvements over time.
b. The FEIS should clarify that mitigation must restore water flow to impacted streams and springs. If a well and pump are installed and unable to restore sufficient water flow, the FEIS should require that additional mitigation be implemented until water is successfully restored to historic levels. The FEIS should also identify the party responsible for maintaining range improvements beyond the scope of the Project.
c. The second mitigation option under Mitigation Measure 3.2.3.3-2c requires "Posting of an additional financial guarantee to provide for potentially affected water supplies in the future" (p. 3-99; PDF 241,116). The DEIS in unclear in how the financial guarantee will be posted or to what level financial compensation will be made available for future effects on water sources.
d. The FEIS should provide more clarity for this mitigation. This detail should include a definition for "potentially affected water supplies," a description of how the "financial guarantee" will be posted, how financial compensation will be awarded, and to what degree financial compensation will be awarded. The FEIS should specify, for instance, if the financial guarantee will be sufficient to cover failed attempts to replace water-flow until a dependable method of water restoration is found.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 859, Comment 97

DEIS Impact 3.2.3.3-3 recognizes that there will be significant impacts on certain ground water wells, which it is predicted will not recover to less than 10 feet drawdown for at least 100 years after the end of the Project (p. 3-103; PDF 244,1[2). As stated in DEIS Section 3.2.3.3.2, drawdown is predicted to be 2,250 feet at the mine and 120 feet in the well field. Additionally, the levels are predicted to recover to pre-Project levels between 400 years and 1,580 years later (p. 3-100; PDF 242, 111).
a. DEIS Mitigation Measure 3.2.3.3.3a provides for compensation of certain ground water users for deepening wells and additional pumping costs "if the difference [between the screened interval and pumping below the ground water table] is greater than maximum predicted drawdown," or if the difference is "greater than ten feet." It is unclear what is meant by "the distance of the screened interval and the pumping below the ground water table" (p. 3-103; PDF 244,111).
b. Additionally, why is mitigation and compensation to the ground water users limited to the two scenarios identified above?
c. The DEIS fails to consider that effects of the proposed action will be seen in areas that show "less than a ten-foot drawdown." Yet these areas will be impacted. The DEIS fails to consider that any and all impacts due to the proposed action should he mitigated as water law does not allow for injury to other water users when a water user, such as EMI-, is changing existing water right points of appropriation and places of use in a manner that will cause injury to existing water users. Any impact to an existing water user will be significant and should be mitigated. The FEIS should require mitigation upon any dewatering within and/or caused by the Kobeh Valley Well Field.
d. Some water users or uses are exempt under the law from use permitting, and therefore do not have a water right determined by the Nevada State Engineer.
The DEIS fails to consider valid water uses that may be exempt from permitting requirements. These uses must be mitigated upon any lowering of the ground water table.
c. Further the DEIS confuses water terminology by calling permits water rights, when in fact they are not a right, but a permitted use. Only upon certification of a water permit, will a water use become a right. The FEIS should reflect the proper use and terminology relating to water rights and water law.
There are several filed and perhaps unfiled vested water claims that have not been adjudicated by the Nevada State Engineer, but are nonetheless valid existing water uses that cannot be injured by newer, junior uses. The FEIS must consider the effect of these filed and unified vested claims when considering impacts to water users. Mitigation under the FEIS and any decision document must be considered for these vested uses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 859, Comment 98

The DEIS fails to consider how compensation will be paid to affected
water right holders and public water users if the Project causes adverse effects and mitigation efforts do not fully protect those persons.
a. Will farmers and ranchers be paid market value for any cattle that die as a result of lack of water? Will damages paid include that of the future loss to the cow/calf crop if it is a heifer or cow that dies as a result of the lack of water?
b. Will water right holders be compensated for loss of use of a real property interest in water? Will this compensation extend to the

loss of future use of that real property?
c. Will mitigation after the fact (such as mitigation triggered only when springs cease flowing) require EML to compensate other users who suffered reduced water access up until water access ceased?
d. Given that some injury will occur and be realized several years after EMI, active mining operations, compensation mechanisms must consider the need for compensation out to 400-1,580 years later. Given the unknowns associated with injury 1,500 years from now, funds need to be set aside to account and pay for these injuries in the future.
Disposition: Comment acknowledged; does not provide new information

Response
CC-072-Mitigation Impacts to Water Users

Letter 859, Comment 99

DEIS Impact 3.2.3.3-5 determines that the recognized effect of the Project on the amount of water available in Diamond Valley is not significant when compared to all other uses of water in the Valley (p. 3-108; PDF 249, 113). Why does the comparison to ALL OTHER uses in the entire valley mean that the proposed use is not significant? This is only ONE Project and could significantly effect interbasin flows and the availability of water within Diamond Valley, which is already experiencing overdraft challenges. Furthermore, the effects in Diamond Valley are significant as any additional water uses from a hydrographic basin that is already over appropriated will have severe and significant impacts. The FEIS should recognize that the effects of the proposed action on water in Diamond Valley arc significant and thus require adequate mitigation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 859, Comment 100

DEIS Impact 3.2.3.3--6 states that losses of ground water may be lost at a rate of 161 afa from the open pit lake in perpetuity, that EML may need to acquire a water right for such a consumptive use of water, and that a permit could be issued because the water use would constitute a beneficial use for mining operations (p. 3-108; PDF 249,117).
a. How would ground water loss in perpetuity of 161 afa be considered a beneficial use when the mine would only be operational for 44 years? Wouldn't the water use constitute waste after all mining operations cease? The BLM or EMI, cannot determine which beneficial uses of water are more important than other beneficial uses of water. It is the responsibility to the Nevada State Engineer to issue permits and determine beneficial uses. In the local of the mine, there are several current issues, including the current state of overdraft in Diamond Valley, that limit and prohibit the issuance of new permitted water uses. The FEIS cannot make a statement that a new permit would be issued when the BLM nor EMI, has no jurisdiction to issue said permits.
Disposition: Comment acknowledged; does not provide new information

Response
EML has already acquired and gained approval from the State Engineer for permanent transfer of ground water rights in Diamond Valley, in the amount of 385 acre-feet per year, to the pit portion of the project after the duty is adjusted down for crop consumptive use (State Engineer Ruling 6127 dated July 15, 2011). The State Engineer's ruling was affirmed by a Nevada District Court on June 18, 2012. The State of Nevada has deemed post-mining pit lake filling and evaporative losses as part of the overall beneficial use derived from the mining project and not a waste of water. This determination is consistent with numerous open pit mining projects throughout Nevada. There is no new appropriation of groundwater in Diamond Valley, as EML acquired actively used irrigation rights in Diamond Valley for transfer to the pit. There is no detrimental impact to the available groundwater in Diamond Valley because the State Engineer reduced the duty of the rights being transferred to the pit to be equal only to the crop consumptive use portion of the irrigation rights. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 101

The FEIS should explain why the backfill alternative actions were not chosen to prevent the anticipated water waste?
Disposition: Comment acknowledged; does not provide new information

Response
CC-076-Partial Backfill Alternative Impacts

Letter 859, Comment 102

The loss associated with pit lake evaporation is not considered a substantial impact in the DEIS, yet the loss is 161 afa, an amount far greater than impacts to other spring sources that require mitigation. The loss of 161 afa is enough water to irrigate a quarter-quarter section of land for a year and successfully raise a crop. The FEIS should be reflect that 161 afa of ground water lost is significant
Disposition: Comment acknowledged; does not provide new information

Response
In the context of impacts to basin water budgets, the long term evaporative loss of 161 acre-feet per year is not significant. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 103

Water flows into the pit lake from Diamond Valley, a hydrographic basin in a current state of overdraft. The DEIS fails to consider long-term effects on Diamond Valley water rights as a consequence of wasted water in perpetuity from the open pit mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 859, Comment 104

DEIS Section 3.2.3.5 is the Partial Backfill Alternative which appears to allow the mining with least adverse effects on other water users and faster recovery to ground water resources (p. 3-123; PDF 261, 2). The FEIS should explain why this is not the preferred alternative when the results are the same with less adverse effects at the end of the Project?
Disposition: Comment acknowledged; does not provide new information

Response
CC-076-Partial Backfill Alternative Impacts

Letter 859, Comment 105

DEIS Section 3.3 considers water quality. DEIS Section 3.3.3.1.1 lists the triggers for determining whether a significant impact on surface water quality has occurred (p. 3- 196; PDF 319, ¶2). The first bullet point discusses releases creating significant impacts, but only discusses releases "into drainages." Why must the release be into a drainage to be considered a significant impact on water quality? While discharge into drainages may be important to determine whether or not a NPDES permit is required, there can be effects on ground water quality by the proposed action that result in other than discharge into drainages. What is the DEIS' s definition of "drainage"? The term should either be defined broadly or changed so that all releases of the identified substances are considered significant impacts.
Disposition: Comment acknowledged; does not provide new information

Response
The EIS is correct in establishing the significance criteria as spills into a drainage because the section referenced is surface water quality. In order to affect surface water quality, a spill would have to be discharged to a surface water or, in the case of a dry drainage, discharged in amounts that would cause soil contamination sufficient to affect the quality of subsequent water flows in that drainage. A spill outside of a drainage could not logically affect surface water quality. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 106

DEIS Section 3.3.3.1.2 lists the triggers for determining whether a significant impact on ground water quality has occurred. DEN Chapter 3, page 3-196. The first bullet point limits the trigger to degradation of water quality "by chemicals" (p. 3-196; PDF 319, 114). Why is degradation limited to only chemicals? Do "chemicals" include biological materials or other substances? Additionally, the Paragraph states that if ground water does not meet water quality standards in the baseline, then degradation would only be considered significant if it renders the water unsuitable for an existing or potential beneficial use. This is contrary to the Clean Water Act's anti-degradation and anti-backsliding policies. The trigger should be modified to occur when water quality is degraded rather than when the degradation renders the source unsuitable for beneficial uses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-103-Water Quality Significance Criteria

Letter 859, Comment 107

DEIS Section 3.3.3.3.1 states that increased erosion due to surface disturbances are predicted to be significant, but can be reduced to less than significant if the "standard erosion prevention and maintenance procedures" are followed, and the DEIS cites Section 2.1.15 for said procedures (p. 3-198; PDF 321, ¶1). However, Section 2.1.15 relates to Monitoring activities and incorporates EML's Water Resources Monitoring Plan (in Appendix B) by reference (p. 2-70; PDF 136, Ill). The Plan does not address "standard erosion prevention and maintenance procedures. Thus, the FEIS should consider bow significant impacts on surface waters caused by erosion will be addressed and mitigated.
Disposition: Other (SEE RESPONSE)

Response
The Section reference has been changed to Section 2.1.14.11, which is a new section that incorporates text from the Plan of Operations on erosion and sediment control.

Letter 859, Comment 108

DEIS Mitigation Measure 3.13.3-1 states that the significant impacts from erosion could be reduced to that less than significant via a design to reduce run-on from the north so that a pond could contain storm events (p. 3-198; PDF 321,4115). No design or plan has been submitted to BLM yet. How can the DEIS rely on a hypothetical diversion plan to determine significant impacts will be reduced? What action will BI,M take if, after studies and design, the diversion plan is not adequate to reduce significant impacts? The FEIS should outline the authority and jurisdiction of the BLM to require changes to plans, mitigation, and other Project aspects after the Project is permitted.
Disposition: Comment acknowledged; does not provide new information

Response
The diversion structure would be designed, as required by the BLM and NDEP, to divert the designed storm event. It would be appropriate to design this facility with information (such as precipitation) that would be current at the time the facility is to be constructed (i.e., approximately 30 years in the future). No change has been made in the EIS in response to this comment.

Letter 859, Comment 109

DEIS Section 3.3.3.3.2 determines that because Mn exceeds regulatory standards in the ground water beneath the site, that Mn in the draindown would not degrade ground water beneath non-acid generating rock waste rock piles (p. 3-205; PDF 325,4116). Why, if the water already exceeds standards for Mn, does the DEIS conclude that Mn releases in the draindown cannot degrade water quality? The FEIS should outline and consider the amount of additional degradation that can occur from Mn in the draindown.
Disposition: Comment acknowledged; does not provide new information

Response
CC-103-Water Quality Significance Criteria

Letter 859, Comment 110

DEIS Impact 3.3.3.3-3 (p. 3-206; PDF 326,115) notes "The pit lake would be a water of the State of Nevada, and applicable water quality standards would depend on the present and potential beneficial uses of the lake" (p. 3-206; PDF 326,118). What are the implications of this statement? What does it mean to be a "water of the State of Nevada"? 'low does this affect (if at all) management and use? The FEIS must consider these impacts of the proposed action.
Disposition: Other (SEE RESPONSE)

Response
All water within the State of Nevada is by definition waters of the State of Nevada. Nevada determines the benifical use for the water of the state.

Letter 859, Comment 111

DEIS Section 3.3.3.3.3 discusses how the pit lake would have good quality water at first, but water quality would decrease below applicable water quality standards due to evaporation (p. 3-206; PDF 326, 118). The DEIS fails to consider and address that fact as a potential impact of the Project. The LEIS should disclose and address the changing water quality impacts of pit lake.
Disposition: Comment acknowledged; does not provide new information

Response
A Screening Level Environmental Risk Assessment (SLERA) was performed to assess risks to environmental receptors from the post-mining pit lake, as described in the EIS. The SLERA considered changes in water quality as projected by the pit lake geochemistry model. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 112

DEIS Section 3.3.3.5.3 explains that the partial backfill alternative would create long-term degradation of ground water resources because contaminated materials placed back in the pit would eventually contaminate water quality (p. 3-220; PDF 335, 1110). The DEIS does not consider placing materials other than contaminated materials back in the pit. What is the feasibility for obtaining alternative materials to fill the pit? What is the cost-benefit analysis for obtaining alternative materials given the accelerated recovery time for ground water quantity if the pit is filled? The LEIS should consider the alternative of filling the pit with non-contaminated materials in order to attempt to avoid serious consequences to existing ground water uses and rights.
Disposition: Other (SEE RESPONSE)

Response
The development of a mine for "clean fill" to backfill the open pit is beyond the scope of analysis for this EIS.

Letter 859, Comment 113

DEIS Section 3.11.3.2 discusses how the Project could result in removal or disturbance of riparian and wetland communities, and that indirect effects could also occur from lowering of water table due to the Project (p. 3-387; PDF 505, 1[3). However, DEIS Impact 3.11.3.3-1 states that the Project "would not result in the removal or disturbance of wetlands in the Project Area" (p. 3-387; PDF 505,116). The two paragraphs appear to make the distinction between the wetlands inside the project area and not those within the drawdown area. If wetland plants and communities are removed, and the water table is lowered, then how will no wetlands be removed or disturbed? Additionally, the DEIS fails to consider the effects of loss of riparian vegetation along stream banks such as instability of soils in washes, creating a greater potential for blow-outs and gully formation during precipitation events. The FEIS should outline how wetlands will be protected taking into account the issues outlined herein.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 859, Comment 114

DEIS Section 3.11.3.3 states that the ten-foot drawdown contour does not intersect any mapped phreatophyte vegetation in Diamond or Antelope Valleys (p. 3-388; PDF 506,113). However, the ten-foot drawdown contour does not relate to the definition of a wetland or the amount of water necessary to infiltrate land for classification as a wetland. Why does the DEIS utilize the ten-foot drawdown contour for determining which wetlands will be affected? The LEIS should use a more relevant standard that will incorporate and identified known affected wetlands, clearly the ten-foot contour is not useful in this circumstance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-096-Ten-Foot Isopleth

Letter 859, Comment 115

Also, what is the DEIS definition of "phreatophytc"?
Disposition: Other (SEE RESPONSE)

Response

The definition of phreatophytes is included in Section 6.2 of the EIS. The definition has been revised to read, "Phreatophytes - Plants (including, but not limited to, greasewood, rabbitbrush, saltgrass in the Project Area) whose root systems tap into the water table."

Letter 859, Comment 116

DEIS Mitigation Measure 111.3.3-2, (p. 3-388; PDF 506,1f6) determines that mitigation for lowering the water table to a level that cannot support wetland plants and communities will be for -FILM to provide a seed mix for EML to plant to reduce long-term impacts from loss of phreatophyte vegetation. The mitigation measure does not, however, reduce the loss of wetlands. Are there other mitigation measures that could be utilized to reduce loss of wetlands? Can this "mitigation" measure really be considered mitigation if it does not reduce the loss of wetlands due to ground water pumping? The LEIS should consider alternate mitigation measures that will effectively protect wetlands.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 859, Comment 117

DEIS Mitigation Measure 3.11.3.3-3 concludes that the mitigation proposed in Table 3.2-9 will also mitigate impacts caused to wetland and riparian communities due to lowered ground water table (p. 3-389; PDF 507, 1f3). However, the mitigation triggers in Table 3.2-9 require the cessation of flow from the specific water source (p. 3-37; PDF 229). The FEIS should consider and describe the effects caused by reduced flows, and outline mitigation measures necessary to prevent significant impacts to all wetland and riparian communities.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 118

DEIS Section 3.11.3.3.1 discusses residual impacts to wetlands and riparian areas, including the gradual return of flows to springs, seeps and perennial stream (p. 3¬39; PDF 507, 15). DEIS Mitigation Measure 3.2.3.3-2c and the Effectiveness of Mitigation and Residual Effects section (below the Measure) states that some effects will extend beyond the life of the mining operations and some

springs would experience reduced or eliminated flows in perpetuity (p. 3-99; PDF 241, 14)• Therefore, some flows may never return to support wetlands. The FEIS must consider the permanent removal/loss of wetlands as a Project impact.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 859, Comment 119

DEIS Impact 3.12.3.3-2 explains that there will be impacts on grazing within the Project Area due to decrease in available water sources from fencing of the Project Area and lowering of the ground water table (p. 3-402; PDF 519, 112). The proposed mitigation in 3.2.3.3-2 only takes effect when water flow has completely ceased, and thus the DEIS fails to consider mitigation for when water flows are lowered, but not stopped, and are inadequate to supply water for livestock and feed. Additionally, mitigation proposed in 3.2.13-3 only provides for compensation of certain ground water users for deepening wells and additional pumping costs "if the difference [between the screened interval and puttying below the ground water table] is greater than maximum predicted drawdown," or if the difference is "greater than ten feet." It is unclear what is meant by "the distance of the screened interval and the pumping below the ground water table." Additionally, why is mitigation and compensation limited to the two scenarios identified above? How will affects in areas with less than a ten-foot drawdown be compensated? The FEIS should clarify and address these issues.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 859, Comment 120

DEIS Mitigation Measure 3.13.3.371 (p. 3-412; PDF 529, 15) assumes that EML will use water from its production wells to supply wild horses with additional water sources. Do EML's water right permits allow EMI, to use production well water to supply water to wildlife and stock? Does EML contemplate applying for additional water rights for that purpose, or to transfer certain water rights to that purpose? The FEIS should outline and state from which water source **Disposition**: Analysis modified (SEE RESPONSE)will EML, be supplying water to wild horses, wildlife, and stock.

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 121

DEIS Impact 3.23.3.3-10 (p. 3-629; PDF 737, ¶6) recognizes that reduced flows to Henderson Creek may affect Lahontan Cutthroat Trout ("LCT") recovery under the Endangered Species Act. The DEIS states that any impacts will be mitigated as set forth in Paragraph 3.2.3, however, Table 3.2.9 provides that mitigation is triggered only when there is cessation of flows. The DEIS therefore fails to adequately address the impact on I ,CT from reduced flows and the mitigation measures necessary at that stage of impact. In the FEIS, the mitigation triggers in Table 3.2.9 should be amended to reflect the triggers as stated in the DEIS text, and therefore updated to provide for mitigation prior to flow cessation and irreversible damage to I,CT due to NO water in the creek system.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 122

DEIS Section 4.2 states that cumulative effects were studied for "the three hydrographic subbasins" (p. 4-2; PDF 767,14). It is not clear which three subbasins were studied/considered (p. 4-18; PDF 781, 12). The preceding portion of the DEIS discusses Diamond, Kobeh and Antelope Valleys, but the Cumulative Impacts Section appears to discuss Diamond, Kobeh and Pine Valleys. Why was Pine Valley not considered in the preceding sections of the DEIS and why is Antelope Valley not considered in the Cumulative Impacts section? What will be the significant impacts in Pine Valley? Will mitigation and compensation apply equally to Pine Valley? What will be the remedy if it is found that the Project does have impacts on water resources in Pine Valley? What will be the cumulative impacts in Antelope Valley? The FEIS should clarify which Basins are being discussed and further separately outline the effects associated to Pine Valley.
Disposition: Comment acknowledged; does not provide new information

Response

Section 4.2 of the EIS references Table 4.2-1 which states that the three basins analyzed for cumulative effects are Hydrographic Basins 53 (Pine), 139 (Kobeh), and 153 (Diamond), also shown on Figure 4.2-1. The ten foot drawdown contour would be several miles north of Antelope Valley, and the minimal amount of potential drawdown does not warrant inclusion of that basin in the cumulative effects analysis. As described in the EIS, mitigation would not be restricted to projected effects, but would be based on actual impacts. No changes to the text of the EIS have been made to address this comment.

Letter 859, Comment 123

DEIS Section 4.4.2.2 discusses how agricultural and mining activities in Diamond, Kobeh and Pine Valleys have the potential to discharge chemicals or materials that can migrate into ground water and degrade water quality (p. 4-50; PDF 807,16). The Paragraph then concludes noting that the cumulative impacts would not be significant, based upon the "criteria above." It is not clear what criteria the Paragraph refers to, as no criteria are listed in the Paragraph. The FEIS should reference which paragraphs it is referring to for the stated impacts.
Disposition: Other (SEE RESPONSE)

Response

The criteria are the significance criteria outlined in Chapter 3 for each resource.

Letter 859, Comment 124

What cumulative impacts could occur? Why are the impacts insignificant? flow will cumulative impacts be increased based on addition of the proposed Project? Please outline the stated impacts in the FEIS.
Disposition: Other (SEE RESPONSE)

Response

Chapter 4 of the FEIS addresses the potential cumulative impacts associated with the Proposed Action.

Letter 859, Comment 125

Mitigation Measure 1 notes that EML will update the ground water model as determined by BLM. The FEIS should require the ground water model to be updated regularly, at least once every 5 years during the active life of the Project, or more often if so required by the BLM. In addition, this measure notes that EML will only be responsible for monitoring and annual reporting for 30 years post mining. Given that some impacts will last 400-1500 years after active mining, EMI, should be required to provide for long-term monitoring, at a minimum, through the 400 years post active mining. The FEIS should explain and resolve why the monitoring and mitigation plans stop after 30 years, when known impacts will last through, at least, 400 years. Further, the FEIS should consider the need for long-term monitoring.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 126

Mitigation Measure 2 notes that upon indication of flow reduction, certain mitigation measures would be invoked. Yet, Table 3.2-9 (p. 3-87; PDF 229) only calls for mitigation upon cessation of stream flow. The FEIS should rectify the difference in mitigation triggers in the mitigation plan and in the Tables of the FEIS document.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 859, Comment 127

c. Mitigation Measure 2, 1 2 notes that mitigation plans would be submitted to BLM identifying "the excess amount of drawdown or drawdown impacts to surface water resources" (p. C-4; PDF 959). However, "excess amount" is not defined. The FEIS should define what factors, or amounts of drawdown, are considered in excess so there is an explicit indicator of what should be reported.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 128

Mitigation Measure 2, Ili 2 outlines several methods to enhance or replace impacted perennial water resources, however Table 3.2-9 does not consider all the methods identified. The FEIS should rectify the methods stated in the Mitigation Summary Plan with those in the Table and Chapter 3 of the drafted DEIS.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 129

Mitigation Measure 2, Ili 3 notes that an "approved site-specific mitigation plan" would be created, followed by monitoring and reporting to measure the effectiveness (p. C-4; PDF 959). The DEIS does not state who would "approve" the mitigation plan, though it is assumed the BLM, as the permitting agency, would approve such plan. There are several surface water sources within the Roberts Mountain Allotment in Pine Valley and in Kobeh Valley that Etcheverry Family LTD Partnership relies upon. The [)EIS does not consider the need or ability in these instances (where a source is relied upon by a known entity) to work with the permittee or landowner in creating a mitigation plan, cooperation in monitoring, and reporting on mitigation effectiveness. The FEIS should allow BLM to cooperate with and seek out information from permittees when considering methods, means, and effectiveness of mitigation measures.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 130

Mitigation Measure 3 outlines two mitigation measures for impacts to perennial streams post-operational phases of the mine.
i. The first measure outlined does not consider that the installation of a well at the stream or spring location will require a water permit and given the current state of water use in the Project Area, a new water permit will be difficult to obtain. The FEIS should state that EML will be required to transfer a portion of its water permits for these mitigation needs. Further, it may be impracticable to install a well in a mountain location that vehicles cannot access. Thus, the FEIS should consider the practicability of such mitigation measure.
ii. The second measure outline contemplates posting a financial guarantee; however, posting a financial guarantee for an effect that may not be realized for several decades is likely not a reasonable means for mitigation. Further, when discussing a perennial stream, how is a financial guarantee going to replace water supplies in the future after EML has left Eureka County?
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 859, Comment 131

Mitigation Measure 4 considers one of two options, either lowering pumps in wells or constructing new wells, so that water can be pumped from a depth below the maximum predicted drawdown. This measure does not account for other effects, such as subsidence, that may occur and negatively affect well construction so that regardless of well depth, water cannot be appropriated. The FEIS should add that EML will pay for a new well should the impacts of the Project affect well construction so as to render a current well inoperable. Furthermore, this mitigation measure only considers mitigation to water-righted wells, and does not consider any mitigation for exempt wells, such as those used to supply water for domestic purposes. The FEIS should require mitigation for exempt domestic wells.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 859, Comment 132

Mitigation Measure 5 considers mine-induced impacts to a well associated with a water right. Again the MIS should require mitigation for other ground water wells that are not "water righted" in the strict sense. Note that a water right refers to a water use that has been certificated, though there are state-issued water permits that allow for water use, as issued by the State Engineer. The definition of water right in the FEIS should include all State Engineer permitted uses. The PETS should require that site-specific plans prepared by EML be done in connection and cooperation with the water user. If the water user does not agree with EML's plan, the PETS should state that it will allow individual water users to submit an alternate plan, for BLM's consideration.
Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Comment 133

Mitigation Measure 5 1f3 notes that mitigation will be followed by monitoring and reporting on mitigation effectiveness. The FE'S should include means for water users to submit their own report, or appeal, to the BLM should implemented mitigation not be effective.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 859, Comment 134

Mitigation Measure 6 discusses effects caused by the mining operations that are not realized until post-Project. One of the measures stated is the purchase of that water right by EML. How will the price be set for this water right, and what will ensure that EML offers a realistic or "market" price to begin with? Upon which point in time will the market price be based? The FEIS should outline some parameters upon which a price will be set. Another option is the installation of a deeper well and pump at the affected location to restore the historical yield of the well. The DEIS does not consider that well levels may continue to decline for several hundred years post-Project. The PETS should consider parameters to ensure that a new well can adequately provide water in sufficient quantity to fulfill the full water righted rate and duty for present and future use.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-82-Mitigation to Water Resource Impacts

Letter 860

Comment 1

I Am Sure In Your Heart of Hearts You Do Realize That These Are God's Precious Creations, Just As We Are. In the Bible He Gives Us "Stewardship" (Which Is A Far Cry From "Dominance") Over His Creations. We Have A Responsibility To Take Proper Care Of Each Other, The Animals (Who Cannot Speak For Themselves) And All Of Our Earth. It Is To Our Own Advantage, As Well, To Keep Protecting Our Earth And The Animals For The Purpose Of Our Own Existence, For Without THEM, There Will Be No "Us!" The "Delicate (May I Emphasis "Delicate") Balance Of Nature/Eco-Systems" (Of Which We Are A Major Part) Must Be Dealt With Very Carefully, With A Compassionate Heart, Moral Conviction And Complete Common Sense! I Beg Of You To Pray About Your Choices, And Then Do As Your God Given Conscience Guides You. There Is Way Too Much Cruelty In This World As It Is! Man Is The Ultimate And Most Destructive Predator! Here Is Your Chance And Your Obligation, To Make A Positive Difference In Every One's Lives, Especially Our Wonderful And Beautiful Fellow Inhabitants, All The Animals. How Can We Face The Future With Animals Becoming Extinct In Rapid Numbers In Our Lifetime Or Animals Being Neglected, Abused, Tortured And Murdered? This Is Mostly Caused By Many Evil People Who Are Obsessed With Insatiable Greed, Self-Centeredness And Selfish Ambition. The Reality Is Frightening! How Are We Going To Be Able To Look Our Children And Grandchildren (Including Future Generations) In The Eyes And Then Explain To Them That It Is OUR Fault That We Allowed This To Happen? Do You Not Think They Will Fault Us For Being So Selfish And/Or Complacent About The Wellbeing Of God's Gifts And Blessings To Us (And This Goes For Humans, As Well). As We ALL Suffer The Consequences Of Our Actions Or Lack Of Action?

The History Of Mankind (Although Man Has Been Scarcely Kind To Them) Has Been Linked Hand And Hoof With Horses, Mules, Burros And Donkeys. The Path Of Civilization Is Laid On The Bones Of Equines. "From Sea To Shining Sea" (As Sung In The Song "Oh, Beautiful," Which Is About America) Would Have Been A Long, Difficult, Arduous And Impossible Walk Without Them! They Have Enhanced Our Lives In So Many Ways That It Is Impossible To Put It All Into Words In This Format. I Cannot Imagine What Our World Would Be Like Without Them, Especially The Wild Equines. We/You Owe It To ALL Horses, Mules, Burros And Donkeys To Protect Them By ALL Means Possible, At ALL Costs And Nothing Less.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 860, Comment 2

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 860, Comment 3

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 860, Comment 4

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 860, Comment 5

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 860, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 860, Comment 7

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 860, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 860, Comment 9

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 860, Comment 10

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 861

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 861, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 861, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 861, Comment 4

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 861, Comment 5

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited (to no water) and therefore move from those HMA's the impact to these areas, and consequence to any future populations, must be of primary focus as "multiple use" is mandated under law. The Project may well create an artificial stochastic event and cause animals to move from their designated area making them subject to immediate removal. There must be a contingent option during construction and flexibility as the area destabilizes from the impacts of construction/implementation.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 861, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 861, Comment 7

It is not enough to mitigate damages with spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be determined to ensure that populations do not go any lower than they already are. Mitigation of damages needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 861, Comment 8

This project does not fully study the impacts and potential areas for mitigation of damages to Wild Horse habitat.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 861, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use are appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 862

Comment 1

I strongly urge the BLM to choose the No Action Alternative. This project does not fully study the impacts and potential areas for mitigation for wild horses, wildlife, the range, the farmers and ranchers, the local communities regarding short and long-term loss of water from the surface and aquifer.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 862, Comment 2

The proposed impact to the populations of affected wild horse HMA's. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 862, Comment 3

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance." A proper "draw down" study is essential in an area that receives so little precipitation. According to USGS maps, the deepest water in the aquifer is 100'. There needs to be a projected surface water evaporation study as well.
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 862, Comment 4

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 862, Comment 5

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 862, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use of 40-50 years, and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 862, Comment 7

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 862, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 863

Comment 1

The "No Action" Alternative must be chosen on the Mt. Hope Project until the full impacts to wild horse Herd Management Areas (HMA) and grazing areas are assessed.'
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 863, Comment 2

My main concern is the amount of water that will be required. The project will use 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 863, Comment 3

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response
CC-023-Ten-Foot Drawdown Contour

Letter 863, Comment 4

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 863, Comment 5

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 863, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 863, Comment 7

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited (to no water) and therefore move from those HMA's the impact to these areas, and consequence to any future populations, must be of primary focus as "multiple use" is mandated under law. The Project may well create an artificial stochastic event and cause animals to move from their designated area making them subject to immediate removal. There must be a contingent option during construction and flexibility as the area destabilizes from the impacts of construction/implementation.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 863, Comment 8

It is not enough to mitigate damages with spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be determined to ensure that populations do not go any lower than they already are. Mitigation of damages needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-079-Impacts to Wild Horses

Letter 863, Comment 9

This project does not fully study the impacts and potential areas for mitigation of damages to Wild Horse habitat.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 863, Comment 10

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use are appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 864

Comment 1

I urge BLM to select the "No Action" alternative for the Mount Hope Project. The EIS fails to evidence that the mine could operate without devastating, long-term effects on the environment and the human population residing within many miles of the site. For this reason, BLM must choose the "No Action" option. My comments address just some of the factors weighing against the project.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 864, Comment 2

Although the draft EIS is neatly organized, it lacks the important thing: Substance. Massive, long-term environmental impacts were given short shrift. Analysis was shallow and perfunctory. Promised mitigation measures appeared vague, weak, and ineffectual to compensate for the destructive activities they are supposed to ameliorate. Indeed, the devastation the mine would cause cannot be mitigated. BLM must reject the proposal.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 864, Comment 3

Surely drawing down so much water will affect natural springs, seeps, creeks, and the water table itself in an area much larger than just the 8,318 acres despoiled by the mine project. These water sources could dry up and the water table become significantly lowered, negatively impacting residents, livestock, wildlife, and wild horses.
Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 864, Comment 4

Some glaring omissions were noted. BLM required the applicant to submit merely a 10-foot water drawdown map. Where are the 1-, 5-, 20-, 30-, and 40-foot draw-down maps? Their conspicuous absence suggests that the results might not be favorable to the applicant. Complete sets of maps in regard to water drawdowns must be submitted.
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 864, Comment 5

To approve this project would be irresponsible. Therefore, the Mount Hope mine proposal must be rejected.
Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 864, Comment 6

The dangers of toxic exposure to molybdenum -- dust inhalation, ingestion -- are reported by the Centers for Disease Control and Prevention, which caution: "Human data: Mining and metallurgy workers chronically exposed to 60 to 600 mg Mo/m³ reported an increased incidence of nonspecific symptoms that included weakness, fatigue, headache, anorexia, and joint and muscle pain [Lener and Bibr 1984]."
• http://www.cdc.gov/niosh/idlh/moly-mo.html

Additional precautions and warnings about inhalation and ingestion of molybdenum at the sites linked below.
• http://en.wikipedia.org/wiki/Molybdenum#Precautions
• http://en.wikipedia.org/wiki/Molybdenum#cite_note-71
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 864, Comment 7

Cattle can develop copper -- Cu -- deficiency from excess Mo in their diet. Symptoms include:
• Scouring
• Weight loss
• Depigmentation
• Reproductive impairment
• Death.

Calves are most susceptible. Early symptoms are often irreversible. While Cu mineral blocks may offset the Mo excess somewhat, administering Cu boluses or injections to ensure health -- while not overdoing it and thereby causing copper toxicity -- might be problematic for livestock operators Out West. Their counterparts Back East keep their stock in relatively small pastures, while Nevada ranchers have vast expanses of rangeland (often unfenced) with which to contend. It would also seem difficult to identify calves beginning to show signs of molybdenosis out on the range and get them treated before permanent damage had occurred. The potential for weight loss, reproductive failure, and mortality in livestock from excess Mo could also harm the Western cattle operators economically. One solution -- feeding properly cured hay -- would be financially infeasible per their business model.

The availability of Mo to plants correlates strongly with soil pH. Out West, soils tend to be alkaline, and alkaline soils enhance Mo's availability. In fact, Nevada's native soil may itself contain sufficient Mo to cause molybdenosis. Mining spoils along with dust carried away by the wind from an open pit at Mount Hope could worsen problems in this regard, impacting animals as well as humans over the 50-year life of the project.

Sheep apparently can tolerate higher levels of Mo. However, lambs may suffer ataxia and lesions similar to those in swayback disease, if the ewes ingest high levels of Mo during their pregnancy.

Horses do not seem to suffer from molybdenosis, but may develop osteodystrophic conditions if their forage contains high Mo levels over an extended period. This scenario would certainly apply to wild horses and burros living in the area around the proposed mine. Domesticated horses could also be affected.

Other wildlife could also be adversely impacted by molybdenosis, especially other ruminants such as mule deer.
•
http://www.sdgs.usd.edu/pubs/PAPERS_PUBLICATIONS/Copper%20Deficiency%20in%20Harding%20County/Copper%20Deficiency%20in%20Harding%20County%20-%20Molybdenosis.pdf
Disposition: Already addressed in planning documents

Response

Air quality modeling conducted for the Project (Section 3.6.3 in the EIS) shows that there is limited generation of fugitive dust from mining and waste rock management activities. The intent of the operation is to recover the molybdenum not release it in dust and disposal of waste rock. No change has been made in the EIS in response to this comment.

Letter 864, Comment 8

Evidently, most molybdenum compounds have low solubility in water. However, the molybdate ion $MoO4^{2-}$ is soluble and forms when molybdenum-containing minerals are in contact with oxygen and water. Have the potential dangers of contaminating both the groundwater and the produced water with molybdenum been studied? Winged wildlife will surely make use of the pit, despite fences. How will it impact their health?
Disposition: Other (SEE RESPONSE)

Response

Potential impacts to wildlife as a result of the open pit are analyzed in Section 3.23.3 of the EIS. The analysis indicates that the risk to wildlife (including terrestrial and avian) are low. No change has been made to the EIS in response to this comment.

Letter 864, Comment 9

The WHO advises that, "Molybdenum is not removed from drinking-water by normal treatment processes and appears to require specialist treatment such as ion exchange." Eureka Moly reportedly has no plans to treat its produced water by any method.
Disposition: Comment acknowledged; does not provide new information

Response

The Project is designed as Zero-Discharge facility so treatment of process water is not warranted. No change has been made to the EIS in response to this comment.

Letter 864, Comment 10

BLM currently keeps the wild horse populations of the three herd management areas -- Roberts Mountain, Whistler Mountain, and Fish Creek -- at genetically non-viable levels. This deficiency must be resolved whether or not the Mount Hope Mine were approved, but would be much more difficult if it were.

It is invalid and unacceptable merely to combine HMAs on paper, and then declare them to constitute a metapopulation, a "complex." This ploy is proffered by numerous BLM offices so that individual herd numbers can be kept well below what is needed for them to be genetically viable while pretending that they are right-sized. The alleged metapopulation -- referred to as the Wild Horse Complex -- along with BLM's tales of horses cleverly getting around fences and through closed gates -- does not pass muster. The stories are disingenuous. True reform is urgently required. These herd populations need to grow.

BLM can offset the increased wild horse numbers by using the agency's adaptive management mandate and its discretion, per 43 CFR 4710.3-2 and per 43 CFR 4710.5(a), to reduce or even eliminate the grazing of privately-owned animals in order to improve conditions and forage availability for wild horses. The Agency can restore range unfairly zeroed-out or negotiate land swaps.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-091-Wild Horse Analysis

Letter 864, Comment 11

The proposed mine would fence off or otherwise eliminate 15,322 acres of wild-horse range across the three HMAs. Thus, many currently-available grazing areas would be lost. Further, access routes to water resources, and many of those watering sites themselves, would be eliminated by the proposed mine. Even springs, seeps, and streams that would remain physically accessible probably would no longer flow once the mine started drawing down 7,000 gallons a minute from the aquifer. As a result of these disturbances, a change in vegetation could occur -- and in an area significantly wider than just the immediate site of the project. Such losses of watering sites, combined with a decline in rangeland forage, could impact the survival of wild horses as well as other wildlife.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 864, Comment 12

If the project went forward and the above disastrous scenario materialized, then BLM would be duty-bound to expand the HMA boundaries to mitigate the true loss in grazing and water access. Further, it would be poor planning to wait to schedule mitigations to restore springs until after the project's construction phase had ended. Abundant additional water sources should be created before construction began. Ownership, operation, and maintenance of all such new watering devices should transfer to the BLM immediately. In addition, whether or not there ever is a molybdenum mine at Mount Hope, BLM should, on its own, commence construction and installation of a system of guzzlers throughout the HMAs.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 864, Comment 13

The "No Action" alternative must be chosen because the proposed Mount Hope Mine would negatively impact the environment, the residents, livestock, wildlife, and wild horses. I urge BLM to deny the permit application for the mine. Would you please respond to these substantive comments.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 865

Comment 1

I am writing to urge BLM to choose the "No Action" alternative in this HMA. By doing anything less, BLM will fail in its obligation to protect and prioritize wild horses and burros on their ranges while maintaining the multiple use standard in accordance with the 1971 Act as originally drafted and as modified by the Federal Land Policy and Management Act of 1976 and the Public Rangelands Improvement Act of 1978.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 865, Comment 2

I am incorporating below comments I have borrowed from Laura Leigh's Wild Horse Education review since they perfectly reflect my personal knowledge and concerns about this wonderful area. I ask that this my letter be given the same weight and consideration as though I had penned every word myself.
Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 865, Comment 3

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 865, Comment 4

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."
Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 865, Comment 5

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 865, Comment 6

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 865, Comment 7

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.
Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 865, Comment 8

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.
Disposition: Not within document/decision scope (SEE RESPONSE)

Response
CC-092-Wild Horse Movement Patterns within HMA

Letter 865, Comment 9

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 865, Comment 10

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.
Disposition: Comment acknowledged; does not provide new information

Response
CC-078-Impacts to Wild Horses

Letter 865, Comment 11

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 866

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka. Nevada receive its federal and state permits, commence construction, and begin operation.
We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.
Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.
From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.
While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.
We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 867

Comment 1

I've been in the mining industry since high school. I started for Kennecott Copper Corp. in Ely, Nevada in May of 1974 and a few years later in 1976, took a transfer to SLC, Utah to work for Kennecott Minerals Corp. – Bingham Canyon Mine. I've enjoyed the mining industry and got a lot of good experience along the way. I have 26 years in the mining industry.

I moved to Eureka in 2008 and bought property here to hopefully retire here. Since I've been here in Eureka, I've seen General Moly,

LLC struggle and struggle and have to climb over several hurdles to finally get the where their at now. It sure seems odd to me that several other mines around the area haven't had to do this. It seems that the other mines, especially Homestake – Barrick Ruby Hill and Placer Gold, got their permits allright and started operating. I feel that General Moly has great revenue and assets to bring to our community –

It's time for Eureka, Nevada, as a community to grow and prosper like it should have several years ago – when all 4 mines were operating. It seems that the Eureka County Commissioners are doing everything they can to try and stop the growth, instead of helping encourage new business to prosper here. It's time to wake up and smell the coffee or roses!!!
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 868

Comment 1

We support the continued practice of willing and "multiple use" on our public land and the Proposed Action Alternative, with modifications
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 868, Comment 2

Require no Backfill. This alternative is expensive and serves no economic or significant environmental benefit in weighing the additional fuel required to backfill vs the potential evaporation from the pit lake. The BLM does not address the economic impact of this alternative on the project. In addition, a significant recreational opportunity exists from a pit lake that is not addressed. If the surface stockpiled (potential pit backfill) is sloped, contoured and allowed to be naturally seeded, over time it would be indistinguishable from the surrounding terrain.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 868, Comment 3

Require no Off-Site Transfer of Concentrates for Processing. There is no economic or environmental benefit to an off-site processing of concentrate. Keep all the process and the mine together! This will reduce roads, water, power and transport impact. It will allow security of one site, not two, and could reduce the total manpower requirements due to dual site labor duplication. Transport of concentrates would increase the carbon footprint and cost of the final sellable product.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 868, Comment 4

No Slower, Longer Project Alternative. Allow Eureka Molly, LLC to design, build and operate their mining and process facility to optimize economy of scale for mining and process. There is no economic or environmental reason to lengthen the mine and process life to be longer than that Eureka Molly, LLC proposed in their plan of operation.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 868, Comment 5

Any alternative to the proposed action must be based upon "sound science and engineering The BLM must economically evaluate any alternative to Mount Hope proposed action. Great socioeconomic impacts could occur from the BLM adopting any alternative, which is not thoroughly evaluated economically in the DEIS.
Disposition: Other (SEE RESPONSE)

Response
The analysis in the DEIS is based on the best available data. NEPA does not require an economic analysis for every alternative, however, a socioeconomic analysis of the potential impacts resulting from the alternatives is provided in Sections 3.17.3.4 through 3.17.3.7. Even the fact that the detailed socioeconomic analysis for the Proposed Action covers the first ten years of the operation, details assessment of all the socioeconomic effects over the year the anternatives, particularly the Slower, Longer Project Alternative and the Partial Backfill Alternative would be speculative and not feasible.

Letter 868, Comment 6

I strongly recommend the Proposed Action with my modifications of: backfill. off-site processing and longer project alternative.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 869

Comment 1

My name is Betsy Barker and I agree with General Moly. I think that change is a good thing and we don't need to stop it. Everyone profits from it so they just need to do it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 870

Comment 1

My name is Mat Wong and I'm I want the mine to go in because I'm tired of seeing all my friends' kids have to leave the valley to find work. And I really believe that most the hold up from the farmers is over just over greed. Because I've heard them sit and talk about I sit through their meeting or through their little chats and they want bought out because they don't want to be like the rest of us and have to earn their retirement and sell out. That's all I have to say.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 871

Comment 1

My name is Ronald Woodworth. And basically I want it to go in. It's ridiculous that they're fighting this. All the studies have been done and approved and they've got the water rights. I'm tired of about all I can do any more is operate equipment. And for the farmers it's part time through the summer and then you starve all winter. It's about time there's good job opportunities showed up down here. Give a chance for the town to grow. And that's basically it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 872

Comment 1

Bob Dinwiddie and I'm for Mount Hope. I think we need the jobs. They have 400 jobs in something like a 40 year mine life. I think it would be good for the community and good for the economy of the United States.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 873

Comment 1

I'm Bobbie Dinwiddie and I believe in a job that supports three or four generations of family where that our grandchildren don't leave the community our children and grandchildren don't leave the community; they're still here when our old folks need their family around them. I appreciate the idea of a long term job and real money, even though it's too late to do me much good.
Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 874

Comment 1

Mike Laughlin. Well, I'm in support of General Moly, as long as it's done correctly and it doesn't disrupt this whole community and the area and end up with Walmart down the street here that we don't get I mean, like it is in Elko where you can't drive down the street and the crime and the boomers and the people that follow this trade. This is pretty dangerous stuff, these kind of people coming into our community like this.
And I'm not too sure about the man camp being set up next to the housing development up there. I don't know if that's the right way to go or not. Other than that, if it's going to go, it's probably going to go.
Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 875

Comment 1

James Eaton. I want the mine to come in. You know, it's just I've been mining for probably 20 years, you know, from gold mining to coal mining to uranium mining in Colorado. It needs to come. You know, it needs to be here. It just has to come in, you know. It would be good for everybody. You know, I see the farmers' point of view, you know, we need hay for the cows that we eat. But we need minerals, too. The mining, you know, we can't live without it. So that's about all I got to say.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 876

Comment 1

My name is Richard Landers. I'm a retired guy, but I'm not ready to retire yet. My wife and I specifically moved to Nevada because we liked the wide open spaces and the business friendly climate. I would like to try to open a machine shop here, which even if this mine doesn't go through I think there's probably good opportunity for such a shop. But if the mine does go through they're absolutely going to need a machine shop here, period. There's no choice about it.
I've got quite a few decades of experience working in a shop like that or supervising workers. I just don't feel like kicking back and taking it easy retiring when I could be generating money. And I'm anxious to see this mine come, come to happen if as long as everybody is kept happy with the water rights thing, because I would like to see us generating money instead of just using it up here.
I don't know what else to say. I guess even the balance of payments sort of thing between nations, you know, this in its own little way is affecting that, in my opinion, and that we're making a product here instead of just using up money from somewhere else. So I I hope it happens.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 877

Comment 1

My name is PJ Benet Davis.
I am here because my dad passed away and he ran the one of the RV parks up here for 40 years. And it's mine now and I want to make it it has to be completely redone, but I want to make it a viable business here. And I'm appalled, really, at the problems that we're encountering with getting this mine going because mining is this county's life.
And I feel that if they don't let it go through, they're denying us something that they're going to take anyway later on, whether we want to do it or not. They're offering us choices now and they're not they may not offer us choices in the future. I would like to have let them have a chance to do something about this mine because I don't see any reason not to. That sounds dumb, erase that. I know you can.
I think I want this mine to come through because it would be beneficial, especially this time in America's history, because we're not getting anywhere. We need the jobs. We need the minerals. And if there's a lot of ranchers, I understand their plight, but some of them have been using way too much water for way too many years. I just feel that it's something we need right now. Not in the future, now. That's not really what I want to say at all, but that's what you're going to get.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 878

Comment 1

My name is Jean Fierro and I am the owner of Red Lodge Paralegal Services and I am the paralegal. What I'd like to say is that I completely support the Mount Hope project. I think that is the best thing for this area, this town, the community as a whole for jobs, for growth, and for numerous types of amenities that would be brought into this town.
Right now the way things look, there's nothing here. And businesses are folding every day left and right. My business, I actually service five counties. And I can pick up my business and leave. But a lot of other people, they just can't do that. As far as growth potential in this town, their just isn't any. Very few services. I mean, we're out in the middle of nowhere. And families are not going to move here. This is not going to be a family community. And if the commissioners and the people of this town are worried about, for example, crime, well, they're not going to have to worry too much longer because that's all that's going to be here if the only ones that come here are the single miners and the only thing they have to do is drink.
The other thing is that I think that the ranchers and the farmers I know they're concerned about their livelihood, but as business owners we are equally as concerned about our livelihood. So I am totally behind it. I think the water issue seems to be forefront right now is kind of interesting considering that there has been so much use of water out there in those valleys. I have not been aware of any anyone addressing that before now. Not at least until another mine or that mine came in.
So now I am totally for this project. I back it all the way. I sent a letter to the BLM and I just want to make sure that this goes on the record.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 879

Comment 1

Anthony J. Rowley, and I'm for General Moly. I think we need the businesses and the jobs. It will help our community.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 879, Comment 2

I've had 10 or 15 people ask me to provide them a job and they couldn't get a job and even left the community. So that's what I think. I think it's a good thing. I want to see everybody taken care of and I want to see I don't want them to suck all the water out of the farmers either. But I think we need both things to be litigated out and on an even keel. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Letter 880

Comment 1

Mary Zunino. I'm a small business owner and I'm very much in favor of the Moly project. I've looked at all the water tables and how it's going to impact the environment. I see no problem with that. I think it would be great for our community. We need more people in town so that we can get more services in town. And very much in favor of them. I think they're a good company, willing to stay here and contribute to the community.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 881

Comment 1

Lawrence Mohler. As a small business owner and long time resident here, we've been hoping that they would finalize this project and get going. We're fully behind the project with the idea that it's going to help the community and improve the situation here, small business wise and general living conditions. So that's our stand. We're fully behind them. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 882

Comment 1

My name is Nancy Gray and I'm the human resources coordinator for General Moly and I'm strongly in support of the Mount Hope project. It will bring career opportunities and growth for Eureka and the surrounding area. For me personally, it will mean a career opportunity to participate in developing a first class mine and give me the opportunity to help create a work force that is skilled and has a long term future.
And I'm excited to be a part of that. And I'm also proud to work for a company that shows great environmental stewardship and leadership in the community and willingness to partner with Eureka, as well as the nearby county. And I'm also excited about the high paying job opportunities and generous benefit package that goes with it, for me personally and for those that work for our company.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 883

Comment 1

My name is Lisa Bennett. I'm a consultant for General Moly. I'm for the project. Personally it impacts me with a career opportunity, but it also will, you know, provide Eureka with 400 jobs over a course of 40 years and donations and support of the company for the community.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 884

Comment 1

The name is Bernard Pacheco and I do work for General Moly. And I support the project, obviously. But Eureka, you know, I've been involved in the mining industry and I've seen what what the development can do if it's done cooperatively with between the

communities and the mining organization. And it gives you a great opportunity to keep your town from dying out here. The kids that are raised here, go to school here, have an opportunity with some some high level positions with the mine. And it would help keep the city in tact and moving forward. So I would recommend the support of the project
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 885

Comment 1

I had some remarks as to the EIS person. As far as they it's salt desert shrub community. They say it the "salt desert scrub." It's not. It's supposed to be shrub. And "scrub," it's throughout the document.
Disposition: Comment acknowledged; does not provide new information

Response
CC-101-Salt Desert Scrublands

Letter 885, Comment 2

And I also would like to ask when they talk about the phreatophyte vegetation and when that is harmed and they say that the BLM will provide appropriate seed mix, I would like I think it would be smart if they grow or wise if they know what that seed mix would be, because I would like to know myself. I don't know that there's a seed mix available that's going to replace such a fragile environment if that plant community is lost.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-020-Impacts to Phreatophytes

Letter 886

Comment 1

Gerey Dillinger. I am in support of the project. I believe it's a project that could revitalize Nevada and America. It's a very exciting project that could create a lot of good jobs, safe jobs for the American people. I think the impact that it could have on the local economies and the tax base due to the royalties is huge, resulting in, you know, good programs, education. And I believe these mining companies are good stewards of the community and of the industry.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 887

Comment 1

Mike Lortie. I propose this project to go. It's a positive thing for the whole community. Eureka both counties, Eureka County, Elko County, the whole Nevada. I think it will be great for all the people there and also for all the mining suppliers, create more jobs for everybody. And with the 400 people that will be coming here to the mine, also that will be great for the economy and boost this whole area.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 888

Comment 1

John McMahen. I think for the mine coming in, this Mount Hope, I think they deserve a fair shot at it and it will bring more jobs to the community, more economy, more town growth, and bring more and again, bring more jobs, which is very, you know, places people right now are hurting. They're getting laid off. They have the don't have the opportunity to work. I think this will be a golden

opportunity to bring more jobs and, you know, more town growth. And I think this mine would really do that, you know, really boost this town and maybe the economy and everything else.
I just think it's a great thing for the community and for the economy to produce and bring Eureka along. Good for the school districts, maybe we'll have some great things happen; football team, wrestling team, and get baseball back again. I really don't think that it's going to influctuate and bring a lot of riffraff into this company or into this county. So I think it's going to make Eureka a very rich county still and bring some good things along. So I enjoy living here.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 889

Comment 1

Nate Garner. I would like to say I believe General Moly has put a lot of time, effort, and money into studying the water and the other issues in the environmental impact statement. And I believe it's time to get the jobs going in this community.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 890

Comment 1

Richard Carlgren. But my feelings on the Moly project is I feel it should go through. Mainly for the state and for the county, benefits the county and the state. I think there's a little bit of too much, what are you going to do for me? I mean, I've talked to people. It's kind of like, I want. And it's, like, groups. And they all want something. And I think some of the demands that they're they want from General Moly, you know, that's not their they're in the mining business. They're not in this other stuff.
But mainly I'm for it. I think it will be good for taxes and I think it will be good for the young people having someplace to go, once they want to start a family and stay in the area.
The water situation, I guess I'm not really maybe cognizant of everything about it, but I think that's another me, me, me. You know, before Moly even came they were over, you know, adding pivot after pivot after pivot. They were draining the stuff down themselves before Moly was even involved. And they're hardly going to be taking any or just a little bit of water from them. But I'm for it. I know a lot of people that are for it. And I hope it comes through. I think it's going to be beneficial for the area, beneficial for the state.
I just want to see this thing go. I'm just tired of people dragging their heels on it. But I've been for this ever since I moved here. I moved here in '08. April of '08. I just want to see it go. We could sure use it. The town needs the economy, believe me. I just wish they'd quit dragging their heels, the county commission. It kind of kills me. But I just want to see it go. All for it.
I grew up with Michael, he's just a few years younger than me, but I just want to see the town needs to grow. I moved here to retire and that's I want to stay here and I'd like to see another store or two, another station. Like I said, we need the economy here. We do. I love this turn out. This is biggest one I've seen yet.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 891

Comment 1

I'm Roger Osmun with Southwest Energy. I am for the Mount Hope project. I've been watching this; the potential startup of the project over the last few years. I believe it would be extremely good for the county of Eureka and the and the residents of Eureka to get this project started.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 892

Comment 1

Deon Reynolds. I just wanted to video tape my support for General Moly and just say it's time to hire some folks and let's get going. I'm tired of our commissioners going for a few people that they're trying to protect and not the whole group of people that live here.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 893

Comment 1

Dustin Weidler. I'm for the project. That's all I have to say I guess.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 894

Comment 1

Steve Cook with Southwest Energy. I hope that we don't run into too much opposition. I hope we get her going through because I think it will be a good thing.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 895

Comment 1

I'm Cody Dalton. I work for Southwest Energy and I hope this project goes through, just for future jobs and hope to support my family in the future with a huge mine like this property has. And that's it.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 896

Comment 1

Val Sawyer. And I support the project. I think that this development can be completed in a very socially and environmentally sound manner as it proceeds along and I think there's safeguards that will allow people to monitor the potential impact that might occur.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 897

Comment 1

My name is Donald Heuser. I'm here to promote the Mount Hope project. I believe that we can balance the mining industry, as well as the needs of the public and the concerns of the ranchers here. The mining industry has come a long ways here in the last 20 to 30 years as far as balancing the people, plant, the earth and the environment and making sure that the environmental concerns are adhered to

from a from the public, as well as the government regulations as well. So, I'm a believer in it. And Eureka needs it. We need it. We need it as a country. Put people back to work if they want to work.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 898

Comment 1

Thank you. Zach Spencer, General Moly. The Bureau of Land Management's mission is to sustain the health, productivity and diversity of America's public lands for the use and enjoyment of present and future generations.
This is important because 95 percent of the Mount Hope project is located on public land, managed by you, the BLM. The draft EIS on Mount Hope follows your mission. As the draft EIS illustrates, the Mount Hope Project has the following environmental aspects: No endangered species. No wetlands. No sacred American sites. No cyanide or other toxic chemicals. Minimal pit dewatering. Good water quality and post mining pit lake. Minimal land disturbance for new infrastructure.
With regard to productivity in your draft EIS, the Mount Hope project has several benefits including creating hundreds of high equality jobs, substantial tax revenue generation and a long life.
Finally, the diversity of the Mount Hope project offers this part of central Nevada a very promising future. Our family will be able to work here, recreate here and live here for many generations. Essentially, this draft EIS shows that the Mount Hope project complies with the BLM's mission statement and that this project is good for our community. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 899

Comment 1

Good evening. My name is Larson Bills, not Bill Larson. But I'm a Western Shoshone from South Fork area and our people have lived there for quite a while before it was a reservation. And also there's many other people here from other reservations under Shoshone. And I think the main thing I'd like to say to everybody is that, you know, the United States had made a treaty with us and that treaty is still there. And that treaty was a piece of finish up. That means we also have to share the land, not own it, you know, and take care of it.
And what we see as tribal people is that we're we're pretty much against mining, not as mining itself but, you know, the way it's done. I'm sure it could be done responsibly. You know, that means with the earth and with the communities it could be done responsibly. And one major thing I'd like to say that, you know, there's four elements that our people have lived by for thousands and thousands of years, four sacred elements: That's land, air, water and sun. You know, those are people are calling those resources. They are the source. And with one of those gone, we all die. Everything dies, which is one those items gone. I guess I'm here just to say that, you know, as people of Nevada and ranchers, you know, water is a sacred thing that keeps us all alive and animals. We need to look at that real carefully when all this mining activity is going on because I think we're being left out. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Letter 900

Comment 1

My name is Trish Reynolds. And I welcome the General Moly Mount Hope project to our community. As downtown business owners, we appreciate the business that they bring to us. Their support of our business has allowed us to expand the range of services that we can offer to this community. If General Moly is not allowed to open this mine, the town of Eureka will continue its slow decline and its ability to attract full time, long term residents will diminish.
I served as economic program senior assistant for years and I understand the socioeconomic benefits General Moly brings to our remote community. Virtually all businesses will benefit and grow from General Moly's mine. Considering the current tough economic times, the influx of jobs and the tax revenue generated by this mine will elevate not only our community but the entire state of Nevada. I urge the BLM to allow this mine to open and to realize what is best for the majority instead of just the few. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 901

Comment 1

Jared Fitzwater. Keep it short and sweet. I was given permission by a representative from the 3F Ranch to, I guess, put on record that General Moly has been more than fair, up front and honest with us and our dealings with them. We've been happy with them. And as far as General Moly coming to town, I have the feeling that it's going to provide a lot of positive impact to the local businesses, myself included. And I guess that's all I have to say. I'm for the mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 902

Comment 1

This is pretty much a letter that I had written to BLM but I wanted to have a chance to read it tonight. We have had the opportunity to interact with General Moly and its employees for six years here in Eureka. We are business owners and have been in the community since the 1960s. We have seen the upturn and downturns in Eureka's economy firsthand. Because we have not depended on a county or state job for a livelihood, we are perhaps more keenly interested in General Moly's presence here.
General Moly has been very active in the community as a whole, as well as in the business sector. They have sponsored many events for the community, as well as donated to many community programs, many of them for our children. They have shown a real commitment to our community and to keeping the community informed of their plans. The doors to their downtown office are always open and the opportunity to learn about their business plan is always there.
We feel that General Moly has has been and will continue to be a very positive influence in our community. The jobs that will be created will be such a positive thing for Eureka and the whole state. Jobs in this time are extremely important and the taxes derived for both county and state will be very beneficial.
We feel it is well past time for our Eureka County commissioners to stop impeding and start working with General Moly in a positive way. Everyone has spent perhaps too much time on legal fees and appeals. It seems that the BLM and the State engineer give credibility to General Moly's research and statements. In my opinion, it's time for all of us to get behind this project and realize the benefits. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 903

Comment 1

My name is Bob Burnham. I'm on the committee, but tonight I'm speaking basically as a member of the school board. And the district has had some concerns about methodology of developing impact numbers all along. And we still have some serious concerns about that, not that we can't adopt to whatever population comes in here, but methodology of developing those numbers, quite a few of us think is still flawed.

The Environmental Impact Statement has said that in existing terms, 23 percent of local population is school children and the for some reason say only 16 percent of the influx would be school children, which several of us think, if anything, it should actually be a bigger number than what the existing situation is because General Moly isn't bringing in any retirees and the existing data includes retirees in the town. So, theres still a lot of concern as far as impact on schools, the problems that we've brought up with methodology still exists.
Disposition: Already addressed in planning documents

Response
CC-066-Impacts to Schools in Eureka

Letter 904

Comment 1

Yeah, hi, my name is Steve Drimmer. I think most of you know who I am. But our family has owned the land that consists of the Mount Hope property for the last 44 years continuously and I think we've been consistent continuous tax payers in the community. We've dealt with several mining companies over the years. I've dealt with every single one of them myself. Sorry to say, I'm old enough to be able to say that. And our experience with General Moly has been nothing but terrific. They've been honorable, decent to work with.

They're the first company that we felt sure was committed to the actual mining of the property. You know, you can talk about the disappointments of the past when well meaning companies would come and not actually mine the property. Nobody was more disappointed than we, of course. And I can assure you the reason we made the deal we did seven years ago with General Moly is because we really believe in their commitment to mine the property, which is something we wanted very badly.

The last time I was here was three years ago, I think it was, where our family joined with General Moly to create a one million dollar conservatorship fund for Eureka County High School opportunities. And, you know, when I came to Bruce Hansen who is the CEO of General Moly and approached him and told him this was an idea that we had, he willingly joined, and without any hesitation and delay, and helped facilitate this and actually is contributing half the money along with my family. So I have seen firsthand the the demonstration of the commitment to the community from General Moly. So I believe what these other people are saying, that we have no fears that they will be a very, very good corporate citizen and very good for the community and the county. Thank you very much.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 905

Comment 1

Hello, my name is Eric Williams. I'm out of town, I'll be brief because it's far more important for you folks that live here to get more time. I'm from Spokane, Washington. I'm a consultant to General Moly. I just want to make a few points for you. First of all, I love coming here. This a great place. You should be proud of this community. The civil discourse is wonderful. I love staying in your hotels. I love eating at your restaurants. It's a wonderful place to visit.

That's largely because I grew up in the same small town in Montana right in the center of the state. When I graduated from high school, there was about 24 kids in high school. Now, there's about eight in each class, as many as in my graduating class. Now seven or eight kids. So I'm a little jealous of you all. As a former ranch kid, I can understand the growers' concerns, but I'm a little jealous because you all have an opportunity that the community I grew up in doesn't.

So, finally, I just want to also commend the BLM. I'm one of the rare people that actually reads a lot of EISs and I think the BLM has done a really commendable job with it. Thank you so much.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 906

Comment 1

Where Eureka draws its water now is out of Diamond Valley and the water tail there is going down. It's a very big concern for the irrigators here who have done a fantastic job of water conservation, but there still is a challenge. I think that that challenge needs to be addressed. It's hard for me to understand how the State engineer could grant water in an area where they've already allocated water. It's hard for me to understand why the BLM would be behind giving out and participating in the approval of another industry that would take water in an already depleted area. So that's a big concern and I think it needs to be addressed.

Disposition: Other (SEE RESPONSE)

Response

The NDWR has granted EML their water rights for the Project. Section 3.2 of the FEIS analyzes the potential impacts to water resources from the implementation of the Proposed Action.

Letter 906, Comment 2

And it needs to be addressed fairly and it needs to be mitigated fairly. If somebody is going to come in and use that resource that's already lacking, there needs to be compensation for that.

Disposition: Analysis modified (SEE RESPONSE)

Response
CC-011-Monitoring and Mitigation

Letter 906, Comment 3

My next challenge is with water quality. I don't know that there's been enough research going into where that settling pond is going to be, how stable the ground is there, earthquakes. There's going to be a lot of very toxic material go into that pond, as I understand it. It's going to be a huge pond and what if there is a breach in that lining and it goes into the ground? It's going to contaminate the water quality under ground.
Disposition: Comment acknowledged; does not provide new information

Response
CC-077-Water Quality Associated with Storage Pond

Letter 906, Comment 4

My third issue is air quality. Most the people in Eureka have been around mining all of their lives and they've been able to enjoy a clean air facility. They've never had a roaster going on and pollution going into the air like this mine is proposing to do. So I'm just very concerned that in ten years from now we're going to wake up and it's going to look like Los Angeles, basically, down in that valley. So I think that needs to be addressed.
Disposition: Already addressed in planning documents

Response
CC-112-Potential Impacts to Air Quality

Letter 906, Comment 5

You know, I'm not against mining. Half my family members are miners. They make their living doing that.
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Letter 906, Comment 6

I'm just very concerned that we're all the talk about the jobs, that we're going to ruin a lot of agriculture jobs, rancher jobs.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 906, Comment 7

What the people in Eureka's water availability is going to be.
Disposition: Comment acknowledged; does not provide new information

Response
Comment noted.

Letter 906, Comment 8

So I think all those needs to be dealt with in a little better manner than it has been up to this point. I appreciate your time. Thanks.
Disposition: Comment acknowledged; does not provide new information

Response
CC-024-General Comments with No Specified Actions

Letter 907

Comment 1

in addition to the substantial adverse impacts to private property
Disposition: Comment acknowledged; does not provide new information

Response
CC-093-Private Property Impacted by the Project

Letter 907, Comment 2

air quality, water resources and recreation, including fishing on Roberts Creek.
Disposition: Already addressed in planning documents

Response

CC-064-Scope/Scale of Impacts in EIS

Letter 907, Comment 3

The social disruption and fiscal impacts for a project that will likely double the population of southern Eureka County are certain and will have far reaching effects
Disposition: Already addressed in planning documents

Response

CC-067-Socioeconomic Impacts

Letter 907, Comment 4

We continue to assert that the document has many places in it that are in direct conflict with Eureka County plans, goals and policies. We understand there's going to be some level of impact inherent with any plan, but it's the large scale and the scope of this project that our end are at conflict with our goals and policies.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-025-Eureka County Plan Consistency

Letter 907, Comment 5

The mitigation measures spelled out in EIS are too vague and contingent. They've not been carefully analyzed. I'm going to give one example here of the many. One of the proposed mitigation measures is to install a pipeline from the Kobeh Valley Well field to the waters of Henderson Creek in Pine Valley which is an interbasin transfer to provide a source of water to augment flow of the stream.

We believe this is simply a shell game of creating a new, imaginary water source, and analyses do not go far enough to talk about the ancillary impacts from that. One of the main issues is that that mitigation would require Nevada State engineer a lot of work. There's no guarantee that the water rights or the water itself, regardless of the right, will be available for mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 907, Comment 6

But we have been working very hard to engage the mine to work with us to address the housing, fiscal impacts and fiscal infrastructure in impact. It's these impacts to be secondary in the draft EIS and we believe that needs to be addressed.
Disposition: Already addressed in planning documents

Response

CC-067-Socioeconomic Impacts

Letter 907, Comment 7

There's still outstanding issues with air quality. We're happy to learn that the BLM is addressing a new federal standard.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 908

Comment 1

the county still asserts that the use of a ten foot draw down contour as a measure of environmental impacts is too great and we do not accept the rationale provided in the draft EIS that tries to justify a ten foot draw down contour as measure of potential impact of water
Disposition: Comment acknowledged; does not provide new information resources and water dependent resources.

Response
CC-023-Ten-Foot Drawdown Contour

Letter 908, Comment 2

Another example of de emphasizing potential impacts illustrated by the discussion in the draft EIS and headwaters of Henderson Creek where it was asserted the geological structures made produce that reduce the potential draw down in this area and the effect of the creek. There is no evidence that such geologic structures exist.
Disposition: Comment acknowledged; does not provide new information

Response
Geologic structural complexity in the Roberts Mountains is well documented. Montgomery et al (2010) provides details on these features. No changes to the text of the EIS have been made to address this comment.

Letter 908, Comment 3

The need for regular NEPA regulations also require that the environmental consequences of the EIS shall include discussions between the proposed actions and federal act regional lands use plans, policies, controls for the area concerned. Unfortunately, the there are decree water resources incorporated headwaters of Henderson Creek and the draft EIS do not include a to BLM were to define consistencies between proposed action and the decree.
In contrast, BLM states that these decreed rights can be impacted as long as they are mitigated, which undermine the decree which holds the force of lot. Specifically, table 3.29 and similar tables which gives sensational flow for mitigation. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-009-Water Rights

Letter 909

Comment 1

Hello, my name is Scott Raine. I'm a business owner here, fifth generation, of Eureka, Nevada. My particular family, at least that I know of, I'm also a on the Nevada Board of Wildlife Commissioners, it's not been brought up by them, although in that I have specifically reviewed the portion about wildlife and I found that existing mitigation within the draft EIS more than sufficient within that.
If although, like I say, it has not been brought up by that body, simply my own suppositions there. I know there's a lot of every project everybody does is going to have a few negative impacts. I like to turn on the light switch as much as the next guy, a car made out of exotic materials, and this mine will have minimal impacts.
As far as what I've read in the Environmental Impact Statement is sufficient in comparison to many other projects. It's necessary to develop the land. Over the years I've wandered the land where this mine is going to be. Yeah, there's going to be a hole in the ground. But once again, I think it's sufficient. There's sufficient mitigation within that.
As far as the business aspect, clearly it will have a positive impact. We've had but then again every group here has had very positive impacts. Ranchers has been amazing over the years. Kept us alive when the mines have gone. But this mine, it will have a great positive impact. It's got to. There's no other way about this for a business impact in the community. And it will be tough. It will be a huge change. But change is coming whether it's this mine, or the next, or the next project down the street. And we can handle it.
So there is no I think it's sufficient what is in the document. I don't think we need to go spend another $3 million looking at the socioeconomic impacts, as far as that goes. You know, the water issue, it's severely you know, it's a State water engineer and they're the experts on that. You know, that's a whole other argument. I've seen that document was sufficient, what is in that document is probably sufficient on that. Leave it up to the State water engineer, it's what they do for a living. It's another argument for another day.

I think the community can withstand this impact. It's change. I like change. But it's probably good for the community overall and that's the way it is.
Thank you very much for your time.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 910

Comment 1

Hello, my name is Lennie Boteilho and I'm here in a couple of capacities: One for myself and one for the company I work for. I grew up in this area. Grew up in Ely. I spent a lot of time in Eureka. It's a great open area. As kids growing up we enjoyed it and it's a great place for families to continue to raise their children and schools.
I've reviewed the EIS. It's quite extensive. My background is environmental and that's my primary role at the company I work with. And looking at the EIS, I think they've done a great job with all the experts and expertise that's gone into this document. The analyses have been in depth. They've done a good job at looking at all the ways to analyze things.
There's a lot of technology out there. And technology grows every year. And as that continues to grow, you learn more as you go along. The monitoring program, the mitigation plans that they have set in the EIS monitoring programs, they will continue to build on what has been analyzed, what has been projected. And as those monitoring programs go on, with any mine or any kind of development they're going to be able to see the trends that are going on and be able to mitigate things quick enough, or reasonably quick enough, so it does not create a long term impact that's non repairable.
The mine industry has done a fantastic job in the last couple decades with reclamation remediation. I've been involved with many aspects of that in Nevada and around the world, worked abroad, and I will tell you, Nevada does a great job with those things. And I think the Eureka Moly group has done a very good job with the consultants and their team of analyzing those things and putting the right protocols in place, and how they're going to implement the project and make it prosperous and long term and use of the public lands the way they need to be and leave them the way they need to be for future generations.
The other half of my job, I'm I am a senior manager with Ames Construction. And that will bring a lot of jobs for the construction industry here, along with the mining. We do mining. We do construction. We build big projects in Nevada. We've been here for 23 years. We don't plan to leave. And Mount Hope is a big job and we'll be a part of that job. We're proud of that and we were proud of all the other jobs that we're involved with in this state. And we look to continue to be here for a long time. So we're in support of the proposed action as its written and hopefully the BLM will be able to wrap this thing up so we can move on. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 911

Comment 1

I'm Mike Innacchione, General Manager, Mount Hope project. As general manager of the project, I would like to assure everyone that we are committed in mining done right. We will incorporate the highest standards regarding all facets of our business, especially safety and environment. We generally want to be partners with all our stakeholders. I am fortunate to have joined a company that has already demonstrated commitment with scholarships, community projects, and donations.
I believe that the mitigation for all of the impacts associated with the project is properly addressed. Just one example includes the steps we take to ensure that water is protected, as outlined on pages 3 86 through 3 100 of the document. This is just one example of how the BLM and the cooperative agencies have put together a solid document that addresses the environment and socioeconomic concerns.
Nevada currently faces the largest unemployment rate in the country. The Mount Hope project will provide high paying jobs to aid an ailing economy. We will benefit the community, Nevada, and the United States by developing the Mount Hope project. Let's proceed with the BLM's preferred alternative. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 912

Comment 1

About 112 years ago my grandfather set foot in this country for the first time. And since then, my family, both my mother's and father's side of the family have made their living through the earth, whether it be through mining, livestock, or agriculture. I'm satisfied with what I've seen with the BLM, that they have done a very responsible job with what they've done.
On a personal note, some of the people from General Moly have involved me with some of their environmental issues and some of the equipment. I can tell you the bottom line from all of them was, we want to do the right thing. I hear that on a personal business, not on a business basis. I know some of the people from General Moly from other venues have previous business with them and they've already wanted to do the right thing. I'm satisfied with this property that they want to do the right thing.

Going forward, I think it's a legacy they can leave this county and this area of Nevada with something that our children and our children's children will be proud of. So for that reason I'm in definite support of General Moly. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 913

Comment 1

My name is Ken Conley. I am managing member of Conley Land and Livestock. My family, my I raised three kids in this area. A few years ago we started Land and Livestock here in Eureka of which my son and my daughter in law are part owners as well, along with my wife. And they have a son, and I want to see him continue with what we've tried to get started here.
I never take this hat off whenever I go into the public because I don't think there's enough of us left any more and really believe, I encourage everyone, I come from a mining background as well and I don't think anybody wants to see this thing get squashed. But I encourage any of you that come up here and want to show support or your nonsupport, read the document.
If you're concerned about the traffic levels on Highway 278 at the current levels or what they will be, if you're concerned about the air quality, if you're concerned about the future of farming and ranching in this community, if you're concerned about recreation, please, read the document. You're looking at one person who is not satisfied with the document the way it is right now and I think we need to continue to work on it. Please, you have 45 days left to make these comments. So don't pass up that opportunity. I beg of you. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-022-General Opposition to the Project

Letter 914

Comment 1

Hello, my name is Kevin Conley. I'm employed with General Moly. I just wanted to say that I've been in mining for over 33 years. I've been in environmental profession for 20 plus years. One of the great things that I've come across is working with this company. I really am a firm believer in the environmental group that we've put together. It's a very solid group. The company I work for is a very solid company, very supportive of the environment, not only environmentally but also safety. I really appreciate BLM's hard work on this document. I think it's a very solid document and I appreciate everyone's work. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 915

Comment 1

Good evening, my name is Fred Zumwelt. I just joined the General Moly and I'm proud to be here and support the Mount Hope mine and the BLM preferred alternative. For the last five years I've been working in Latin America. While it was a wonderful experience, I'm tired of seeing the good jobs going overseas and hear others say, we need more service industries. You can't support, educate and provide for your family on the phrase, "Would you like fries with that?" America needs good jobs that pay real competitive wages that have medical benefits and saving plans for the retirement, especially in small towns. It's important that our youth have opportunities to work where they were raised and not forced to leave to find employment.
Mining provides opportunity for us now, for our children, and it's good for our nation. It's long term commitment to the community and the people that live here. We're your neighbors. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 916

Comment 1

Hi, I'm Sarge Warrick, I'm the safety manager for General Moly. I'm a Nevada boy. Graduated from Tonopah High School, 1973. Yeah.
I worked with General Moly over the past five years overseeing the safety program in the development of this project and the project near Tonopah. I want to assure you of our high value to safety. During the past five years we have had numerous drilling programs and employed many contractors and consultants. During one period of work between the two properties we had 84 people working. So we have a history of work that's been accomplished and safety activity going above and beyond what's been required of us is the way we've operated.
But we were not required to live by MSHA, Mine Safety and Health Administration, however, we have followed their regulations thoroughly and completely. And this is the attitude that will serve this community well. We're developing a working culture with a caring attitude and a safe operation that will spill into the community. What we do will affect you and we're going to affect you in a very good way.
As an example of this positive effect on the community, nearly all of our current employees are first aid and CPR trained. Going forward, we will continue to add emergency medical trained personnel, mine rescue personnel. We'll have an ambulance on site and our current Emergency Response Plan will continue to evolve so that we can assist the community as needed.
I'm proud to let you know right now that as we begin the new year, we closed last year with zero accidents. I support Eureka Moly and I believe that this company's safety and health commitment will, through training and leadership practices, create a sustainable benefit to the community, to the county, and to the state. I call on all of you who feel the same way as I do, who want good, safe, reliable work, to come forward and make a positive comment to the BLM concerning this document. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 917

Comment 1

Good evening. Annette George Harris with the Department of Tribal Counsel. I am the vice chair for the counsel. On behalf of the tribal counsel, the Duckwater Tribe is in support of General Moly and we want to just thank General Moly for beginning a partnership and a relationship, not only with us, but I see the community as well of Eureka County.
I am a graduate of Eureka High School, as well as my three siblings, and my father retired here at the state highway. So I have a lot of concerns as far as making sure the natural resources are protected. I know that many of you are ranchers and I see that many of the ranchers' families are miners as well, as well as my family. The mining supports our families and I see that General Moly works with each of the individuals.
If you have concerns, General Moly is always willing, and like they said, the doors are open. If you have any questions and you want some concerns answered, they're there to try to work with us. And I believe they will continue to work with us. And I've seen the businesses over the years and I believe that this will be a huge improvement and I support the community, as well, in the stores. Thanks.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 918

Comment 1

Good evening. I'm Todd Gilligan, general manager of Cashman Equipment Company, Nevada Cashman dealership. I stand here this evening to say our company's support of the draft EIS, the subsequent construction and the opening of Eureka Moly's Mount Hope project. Cashman Equipment Company takes pride in being one of our state's oldest businesses established in 1931 and just having celebrated our 80th anniversary of the family dealership.
Our reputation was built on providing high quality drill equipment that supports Nevada's mining industry, as well as Nevada's various construction industries. As a result, have a direct interest in ensuring that Nevada's overall economy recovers as quickly as possible providing support for our our company's more than 1600 employees, as well as countless families that are directly or indirectly connected to Nevada's mining community. We're all fortunate that mining in Nevada is currently a vibrant and thriving industry. We must also recognize that the mining industry is a key stakeholder in within our state for job creation, economic recovery and stability, and continuing community development.
We must continue to encourage and support the opening and reopening of mines, expansion of existing operations, as well as

responsible closure and reclamation of no longer feasible projects. The opening of the Mount Hope project should be considered one of our one of the many projects that are vital in the health and well being of our state and its constituents. Thank you for the opportunity this evening to show our support of General Moly.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 919

Comment 1

Hi. I'm John Colby. Anyway, Mount Hope has been pretty good to me. I mean, they I have some concerns about water and stuff. You know, they haven't pumped no water yet but yet they're helping me fix waters and I'm trying to fix before there ever is a problem and I think they've been very fair. They're willing to listen to you. You know, they're willing to work with you as long as you don't get super greedy. I think that they'll try to help you in any way they can. And I it's been real positive for me. But anyway, that's all I have to say.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 920

Comment 1

I'm Carrie Dubray. I currently work for General Moly. I'm a senior environmental coordinator for Mount Hope involved in the environmental permitting. I, too, am a graduate from Eureka High School. I also graduated from the University of Nevada Reno with my major in Resource Management and Resource Conservation. The mines provided me with an opportunity to return home to Eureka. I loved growing up here and graduated here. I want my kids to have the same opportunities that I did. It's great to be able to live in a rural setting and still be able to have the comfort of knowing that my daughter is in one of the best schools in the state, and I think in the western states. I'm pretty biassed.
By moving back, I can definitely say it provided our oldest daughter with the level of education she needed in order to go on to college. I'm proud to say she is attending her second semester at Dixie State College in St. George, Utah, majoring in radiology. We would not have had the same opportunity had we not come home to Eureka.
Some folks here in the community are worrying about the demographic changing, kind of a glass half empty philosophy. If you look at it from the glass half full, you'll recognize that the mine is going to provide people currently residing in Eureka, and those who have had to leave to support their families, a means of staying or returning to Eureka. Just from the number of people who stopped me on the street or called me or stop in the office, I think the mine has an opportunity to hire at least 25 percent of its employees from people currently residing here in Eureka.
I know several recent Eureka graduates that would like love to move back home and work at Mount Hope and who are waiting somewhat impatiently for the mine to start up so that they may do so. The mine is going to create jobs, not only by direct employment, but there will be jobs created in supporting businesses as well. There is also the potential for individuals to begin their own businesses here in the community.
The contributions that the mine will be able to make to the community after its production will far outshine those it has already made so far. We are committed to the community and it's not the mine isn't just committed to its employees, we continue to coordinate with different groups within a community to develop long term working relationships for the benefit of everyone living here.
And I would just like to say as an employee, I am in support of our mine. I think we've done a fantastic job of assessing all of the concerns and we've put together a tremendous amount of support team and I'm in support of our project. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 921

Comment 1

Thank you for the opportunity to speak with you tonight. I'm Bruce Hansell. I'm the CEO of General Moly. And it's great to see everyone here for this event. We really do appreciate you coming out and providing input. This has been an exhaustive process analyzed this project has been analyzed and studied over the last five years.
I will I just want to say that we at General Moly are committed to doing mining done right; right by the community and right by the environment. To do that, we've invested so far on this project nearly $200 million. That's not all in environmental studies. It's

significant land purchases, environmental studies, engineering work, and buying capital equipment in anticipation of this mine.
Our partners, along with ourselves, will ultimately invest approximately another billion into the project to transform Mount Hope into a world class molybdenum mine and we're committed to developing it accordingly with the highest degree of standards.
But to do so, we do need a record of decision. I want to compliment the BLM on the Draft Environmental Impact Statement that we're discussing tonight. I want to thank them for the hard work, and also the hard work of our employees and the expert consultants and the cooperating agencies and their input into the process as well.
I think we've developed a very strong plan for moving Mount Hope forward. We committed and we have submitted to those agencies the important information that's helped develop this draft EIS. And we know how hard the BLM has worked to make this. Because of the fine work, we've endorsed and clearly endorsed the BLM's plan as laid out in the draft EIS. And the preferred alternative requires that from the very beginning of mine construction through mining and reclamation, we take steps to ensure that the environment is protected and we mitigate impacts that are we first seek to minimize and then to mitigate.
In addition to what the BLM requires, we have said from the beginning we will mitigate impacts caused by us. That's mining done right and that's how we do business. The commitment is infused throughout our company from everything to hiring the best people to manning a strict safety culture in all our activities.
Thank you for your time. We're eager to get started to build this mine and eager to build our already great relationship with this community. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 922

Comment 1

I'm with Jacobsen Construction. I've been involved with a number of mining projects throughout the intermountain west. And one of the things that I can say is that the, the study that has been done by the BLM and others has been very thorough. I've been very it's been very positive as far as the study to mitigate potential issues and concerns for the natural resources, as well as for the socioeconomic impact. And so we are very supportive of this project and I'd like to see it come to fruition. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 923

Comment 1

Hello, I am Carri Wright, long time resident of Eureka and employee of General Moly. Growth in this community is essential to this sustainment by and survival of local businesses and the retention of young generations. Goods and service offered by current businesses are limited which will force the citizens to seek providers outside of Eureka. This limitation results in people seeking outside employment as well, since private sector employment is constrained by the reduction in local spending.
Employment, both primary and secondary is imperative to the development and diversity of the local business sector. As stated in the DEIS, the development of the mine would initiate the development of new businesses providing goods and services within our community, thereby resulting in additional job opportunities.
Admittedly, there is a potential increase in the amount of administrative, law enforcement, and emergency services supplied by Eureka County as pointed out in the DEIS. However, that increase also signifies the expansion of governmental job opportunities. Without an infusion of economic growth and jobs, our community will stagnate and die.
The benefits of the Mount Hope operation offer stability for the local economy, a broader range of employment opportunities, and a higher level of multi generation retention.
As a young citizen, lifetime resident and tax payer in Eureka County, as well as General Moly employee, I have a vested interest in the development and operation of the Mount Hope project. I am in support of the project and implore the BLM that General Moly is granted the permits necessary to implement to begin construction and operation of the Mount Hope mine.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 924

Comment 1

I'm with Q and D. Doug Elder in Reno, a construction company, and we totally support this project and look forward for it getting, you know, more people to work in Nevada. And whatever we can do to help the project, we've already talked with these people, and whatever experience we can help them with to get it off the ground, we're here. So, that's about it.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 925

Comment 1

My name is Paul Heward, registered for this. I'm I think I'm pro the project. I think it is a positive for the area, both economically and for continued development. I think that there are obvious problems, environmental, for water and air quality, things like that. But I think that the project seems to have a very good team, very good group of designers that are mitigating these problems and have a good plan.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 925, Comment 2

My only concern would be that there's flexibility throughout the project to continue developing that mitigation.
Disposition: Comment acknowledged; does not provide new information

Response

Mitigation measures are listed throughout the EIS and will be implemented as deemed necessary by the BLM or other agencies, where applicable. The EIS and surface management regulations also provide provisions for adaptive management in instances where monitoring will be used to identify the presence and magnitude of additional impacts.

Letter 925, Comment 3

But overall, I think the project should be given the go, green flag and proceed. It's a benefit for the state for the state because it will help, I think, allow development of a resource that we need now a days that hopefully will reduce imports, but help us on the exports, as well as materials that we need within the country.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 926

Comment 1

My name is Don Smales, and I was a Eureka County resident for 27 years and I just want to say that I feel that this mine should be allowed to go. I know a lot of the people in the BLM and with the State Division of Water Resources and I trust their judgment. And I also know the environmental some of the environmental people with General Moly. I know the General Manager for General Moly and a lot of people that work there and I think they're good people. They're honest people and they wouldn't do anything to unduly damage the earth. They're good miners. They're responsible miners. And I think they should be trusted to do what they believe is right and I think that our economy certainly needs the mines.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 927

Comment 1

I'm Bart Hiatt. And I just want to speak in support of the project. I've looked over all the EIS information that I've seen and asked some questions. It appears to me that it would be good for the area, good for the state, and I think it would be long term, long term good thing for the state of Nevada. And I think the residents, as well. I think they've done a very good job in doing the study and I think the BLM has also done a terrific job putting everything together.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 928

Comment 1

The flow of some springs and streams may decline and it is given that certain springs will, in fact, cease to flow all together. Some of these impacts may not show up for decades and others may persist for hundreds of years after the project is history.
Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 928, Comment 2

The document, again, this draft EIS, describes a plan to monitor water resources and water dependent resources to provide advanced warning of something bad happening. The county helped develop it consistent with the county's goal of helping the BLM and the mine do things right. Unfortunately, the draft EIS falls short in the ways it proposes to fix things that do go wrong.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 928, Comment 3

There are inconsistencies between the document and the BLM's own NEPA handbook.
Disposition: Other (SEE RESPONSE)

Response

The comment does not provide sufficient information to allow for an actionable response.

Letter 929

Comment 1

Thank you for the opportunity to speak tonight. My name is Bob Pennington. I'm the chief operating officer for General Moly. So I'm here obviously talking in support and in favor of the project. Before I came to the meeting tonight, I had an opportunity to meet with some of the residents of Crescent Valley. And I got to say, quite frankly, that I'm very impressed with the interest from Crescent Valley on this project. Interest to make sure we talk about all environmental impacts, and we've been thorough.
But the group I met with tonight are very supportive and I'm appreciative of their outstanding spirit and commitment to your community and we share in that commitment. I'll be brief tonight. But because, like the BLM, we at General Moly are also here to listen to what you have to say and are interested and want to address any concerns that you have about our project or any ways that we can find to prove our project, I want to emphasize a few key points.
First, I want to compliment the BLM and it's line of experts. They truly are. I have to stop and get off script here and say, you know, I read on the Internet that the BLM is one of the few federal agencies that fully fund themselves. Is that true?

And I like that kind of government work. But I want to compliment the BLM and they've done a very thorough job. They've taken the time, five years hard work to produce a very thorough, solid and defensible draft.
We, in turn, submitted quite a number of reports, somewhere around 24 baseline reports. And I hired equally professional consultants that examined our project in all aspects of environmental impact and visual, water, socioeconomic, air quality and all the requirements of the NEPA document.
Today is a very important milestone for us that BLM presents this plan to the public. It signifies in our mind that our project is moving forward. We're on the verge to get it into construction. We're hoping for a favorable decision. If we get a favorable decision sometime

later this year and before the end of the year, the banks will fund our project. They need a permit before they fund. And we'll move into construction.
And I've started engineering again in January. We shut it down for a couple years due to several delays, one of them being permitting. And we're moving the project forward.
I also want to talk about our commitment. You know, one way to demonstrate commitment is what we've invested into this, the Mount Hope mine today. We've invested close to $200 million in purchasing equipment, funding studies, buying water rights, developing this project. We've got we've got a lot of our equipment stored at our Tonopah project, also in Nevada at Tonopah. We've got we've got our mills stored in Houston right now and in South Africa and Europe. We have transformers stored in Asia, ready to be shipped to our project once we have a favorable decision. So we've stepped forward and believe that this project is permitable and taking the risk to invest that kind of money in the hopes that it will be permitted.
In that $200 million that we've spent, we've invested, just so you know, about $30 million in permitting activities: That includes big water rights, drilling wells, pumping those wells, examining the hydraulic properties of the ground, and examining the pit area, examining the geochemistry of the long term pit lake waters and those sorts of things. It takes a tremendous effort and tremendous cost to put into thick of a report, 1500 pages, more or less, signifies $30 million worth of work. Don't let anybody tell you it's inadequate or hasn't been done well. Took a lot of effort.

Sorry. We're going to bring about 400 good paying jobs to the county. We'll pay overall about 2.2 billion in taxes, significant from the socioeconomic standpoint.
Thank you very much.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 930

Comment 1

Hello, my name is John Curry. I'm a sales manager with Cashman Equipment, the dealer that covers Nevada. I'm actually out of Reno. I thought it was important enough to come from Reno in support of the Eureka Moly Mount Hope project because it this project is much more far reaching than just the local area here. It impacts those of us in Reno and beyond, throughout the State. We have a company that employs about 650 people. I would I would say that that's probably 600 families, and we're all supported mainly by the mining industry throughout Nevada.
We're one of the oldest companies in Nevada. So we've seen the booms and the busts in the mining industry. And I'd like to say throughout our throughout our dealings with Eureka Moly, throughout the years we've seen nothing but high responsibility, high integrity, and have no doubt that they will be the best stewards of the land that our great state of Nevada deserves.
So to make this short, I would I would encourage the BLM to not only, you know, approve this project, but continue continue to improve the responsible mining of the great resources that we have available here. Thank you very much.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 931

Comment 1

as currently proposed and analyzed in the draft EIS the mitigation framed to address adverse impacts falls short of being world class or done right
Disposition: Other (SEE RESPONSE)

Response
See the revised mitigation in Chapter 3 and Appendix D in the FEIS.

Letter 931, Comment 2

There are many aspects of the proposed action that are in direct conflict with Eureka County stated plans, goals and policies in our master plan and laws in our county code.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-025-Plan Consistency

Letter 931, Comment 3

The main areas that are still major outstanding issues are related to private property impacts, air quality, water resources, recreation, including fishing and camping on Roberts Creek, and socioeconomic and mitigation of all adverse impacts.
Disposition: Other (SEE RESPONSE)

Response

The BLM has analyzed potential impacts to all the resources list in the comment. Impacts to private property are primarily discussed under Section 3.12, air quality is discussed under Section 3.6, water resources are discussed under Sections 3.2 and 3.3, recreation is discussed under Section 3.15. No changes to the text of the FEIS have been made to address this comment.

Letter 932

Comment 1

I'd like to make comments on both the personal level and company level. Personally, I've been in the mining industry for about 35 years, mostly in construction and engineering, and a little bit in operation. So from a personal standpoint, I'm really excited about this job because mining is certainly a very important basic industry in the United States. And to get this major project going, I think is a huge step to get the strength in mining back.
Then from more of a company standpoint, I work for a company called Ames Construction. We've had an office in Carlin, Nevada doing mining facilities for about the last 24 years. We've worked for about 20 different mining companies in the U.S. So we have a broad range of experience with a broad range of owners. And I tell you that working with the General Moly folks has been a real pleasure. These guys are exactly what I think is needed to move the project forward.
And without embarrassing Bob, I think I want to put in Ames Construction, their priorities, at least as they've expressed them to us. And I think that's environmental stewardship and safety. Those two combined are our number one priority. Next is quality of the project. And finally, safety I'm sorry, finally, cost and schedule. And, again, those kind of go together. But that's the message that we've received from General Moly and in our experience they're a first class team and we're really anxious to participate in the project.
Thank you:
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 933

Comment 1

Well, I'm not involved with Moly mine at all. I am just a citizen of Crescent Valley, have been for 30 years. But you have to stop and think, these people that I have met who are with Moly are all seem to me to be very intelligent people who know the rules, who know what they're doing. And with this environment of 400 employees, plus, hopefully, I can't see anything negative about it.
Nevada is a mining state. Let's face it. It has been. It was nothing until the mining came here. And I feel that they're just carrying on what has always been for this state. It was absolutely nothing but desert until mining came here. And as far as I'm concerned, I feel that they're intelligent enough to know what the rules and regulations are. They seem to be doing everything they can, that I can see. And I for one can only say, I'm for it.
Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 934

Comment 1

I'm Pat Dempsey, a local business man here in Crescent Valley. Been a mason here. My dad was born here. Watched mining since the mining boom started. And the one thing, too, people want to remember about an EIS, this isn't their first day here. These environmental impact studies have been done for years and years and years. BLM does their very best to address every issue. And I really believe that it has been addressed. And the one thing, this is nothing but a positive for Eureka County. We can darn sure use the extra work. And, you know, with the situation that most of the rest of the state is and a lot of U.S., we sure shouldn't hold up any opportunity to create 400 plus jobs. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 935

Comment 1

I'm Gerey Dillinger from from Caterpillar Global Mining. I'm going to stand a little further back here because it was easier. But as a leading supplier to the mining industry, I'd like to express Caterpillar Corporate support for the General Moly Mount Hope mine in Eureka, Nevada. Caterpillar serves a worldwide mining industry through the CAT Global Mining and Association headquartered in Milwaukee, Wisconsin, with regional offices around the world. CAT Global Mining is the single point of contact for global mineral producers and the primary link to Caterpillars extended mining experts.
Caterpillar has a long history of serving the mining industry. As an important commodity, molybdenum plays a key role in the global economy. We hope this new mine will soon receive the necessary federal and state permits needed to commence construction and begin operations. Mount Hope should provide a positive contribution to the state of Nevada, as well as help provide the natural resources we need as a nation. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 936

Comment 1

Hi, I'm Dina Frost. I am new to the area. I am new to mining. If you want to know about amusement parks, I'm your girl. But mining is a whole different thing. But what I've heard from the mining people, the water people, the Caterpillar people, I've heard different sides of the wall. Folks, the wall better come down. Y'all aren't talking to each other. What you're doing is you're playing your own game and your own office.
We've got people out here who are hungry. You've got a community out here, and it sounds like the community is nationwide; people in Milwaukee, people in Reno, people in where was the other place? Mount Hope is bringing mining to Nevada, which already is mining. Do you think that they have not already done how many environmental impact studies in this state already and in this county? Barrick mine out there, do you think that they haven't already done all the environmental studies for it? And you guys are going next door. What's the problem? Our people need to eat. They have families. They have children. We have schools. Get it done. We're tired of waiting. 2006 and it's 12. Hello. Wake up. We're hungry. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 937

Comment 1

My name is John Andress, I'm a resident of Spring Creek, but I guess, more importantly, I consider myself to be a resident of the northern Nevada community. As ya'll know, this is a big community. Agriculture, mining, they've been historical roots, including my own. My heritage began in 1850 in Utah with some of the Mormon pioneer movement. I've had ancestry that rode the Pony Express Trails through eastern Nevada and western Utah.
I'm a supporter of Mount Hope because it continues some of my heritage, my cultural backing where I can raise a family that allows the same environment, the same western heritage to continue on some of the historical traditions that have been there in the past. I've had nothing on my personal side but a wish for this to go through, as well as many other mining projects throughout the intermountain region.
On my business side, I do deal with General Moly, Eureka Moly, and I've had nothing but professional, courteous, respectful conversations with that group where in my own mind I have been convinced thoroughly they have the community's best interest at mind, not just to make money.
Not to be a pep rally here, as it was put eloquently previous to me, but I want to be a supporter. I want to see the heritage continue of mining, the western region of the U.S. to continue in some of the traditions that my parents, grandparents and others have brought down in my roots and my family.
There are other things involved here on the economic impact. In my own opinion, I see moly as being another product to the community to help offset the gold. Having been 30 years in the mining industry I've seen cycles where moly and gold have fluctuated and almost offset each other. So I see that as a stabilizing factor to the Eureka area. It's not a guarantee, but it's a definite possibility that that could exist. I also see the 44 year mine life being a positive. It's not a seven year mine life. It has to have a lot of impact put

into it, study, after study, after study. I am thoroughly convinced as I've studied this project, everything is in place for it to move forward.
Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 938

Comment 1

Okay. Mine is short. I work for a company called Ames Construction and we're we're going to be helping General Moly out as far as the construction part of the work. There's there's a lot of opportunities as far as people that we're going to be needed to be employed. And it's what is it? How many people did they say they needed, 400? Is that right? 400 people, that's quite a bit. You start thinking about that. That's quite an impact for this area, and I think it's a positive one, something that we have to look at. And we're proud to be part of General Moly's group. That's about it.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 939

Comment 1

I'd like to speak from here. I'd like to come out in strong support for Moly. We need it. We need a future. And I'd really like to ask BLM to keep that in perspective in your business. We need a future. We can't just be tied to one thing. And it seems to me Nevada has been awful tied to one thing. So let us get out of that, let us break that, because that future ain't just for my kids, it's going to be for your kids, too. So let's all do what what we can, County included, to help these boys get this going.
I understand there might be some resistance, but sometimes it takes a little honey. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 940

Comment 1

Okay. That's me. I did give a statement earlier but also I'd just like to add, I've been involved in construction and engineering around the world. I've got a bit of an accent, you can probably tell that. But at present I'm with Ames Construction. We've met with and I've met some of the people from Moly on different contracts. You've got an intelligent bunch that they're really good at what they do and they've got a lot of good professionals joining them.
The EIS, if it's allowed to go, develops obviously the economic benefits that we've all just discussed, that's obvious. But part of the reason that I came to the states is it's a really really the best country in the world to be in. And it's founded on traditions, as we've said, of mining within Nevada. There are implications. There are problems. But that's never held America back. Those problems can be identified. They've got a lot of plans. And the EIS gives you the basis.
The mining is going to be there for 44 years. As they find the problems, they will mitigate them. They will develop their plans and it will expand even more. So there are a lot of tags, there are some improvements, but if it can get started, it will be proved and these people have the skills to develop that and improve on what they've got. So this is just a starting point.
So I agree with the lady here, it's been going on for a long time. We need to get it started and it will improve from that. You have a good team, trust them. You've got enough legislation behind that will control them and keep them within the boundary. They're not going to walk out. They're not going to take advantage and they're going to develop a worthwhile resource that will help the county, the state, and this country. Thank you.
Disposition: Comment acknowledged; does not provide new information

Response
CC-001-General Support

Letter 941

Comment 1

The proposed monitoring and mitigation measures do not provide sufficient assurance that the potential impacts can or will be mitigated. For example, the Mitigation Plan requires a cessation in spring and stream flow to occur prior to further environmental analysis and implementation of mitigation. This would result in a substantial and harmful time lag between impact and measures essential to fully protect these resources. Furthermore, it is unclear that the water necessary for the proposed surface water mitigation is available for this purpose. Without this water, the proposed mitigation appears infeasible, ineffective, and not viable over the long term.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 2

The Draft EIS is inadequate because it does not disclose any detail on how BLM will ensure that funds will be available as long as they are needed to implement the closure and post-closure obligations. The availability of adequate resources to ensure effective reclamation, closure, and post-closure management is a critical factor in determining the significance of the project's potential impacts and its environmental acceptability. An adequate reclamation/closure bond and post-closure funding mechanism are needed to ensure that the costs of stabilizing, reclaiming, and managing the site after closure are covered by the mine operator for as long as necessary. If mitigation funds would not be adequate to effectively protect environmental resources from significant and long-term degradation, the project would be environmentally unacceptable.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 3

EPA continues to believe that the adequacy of financial assurance is a critical element to be addressed in the NEPA process and should be disclosed. We believe such disclosure is consistent with CEQ guidance, which states that all relevant, reasonable mitigation measures that could improve the project are to be identified in an EIS and, to ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measures being implemented should also be discussed. We also believe that recent CEQ guidance concerning mitigation may be relevant; this guidance views a discussion of funding for implementation of mitigation commitments as critical to ensuring informed decision making, and suggests that agencies should not commit to mitigation measures if it is not reasonable to foresee the availability of sufficient resources to ensure the performance of the mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 4

EPA is concerned that the discussion of the project's potential impacts to air quality requires revision for a number of reasons, including a lack of consideration of particulate emissions resulting from the loss of phreatophyte vegetation, insufficient information regarding the emission of Hazardous Air Pollutants from the toll roasting process, and a lack of clarity in regards to air modeling protocols employed. The Draft EIS also does not provide sufficient information on the transport and fate of constituents in seepage/draindown solutions from the tailings and waste rock disposal facilities (WRDF).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 941, Comment 5

We recommend that BLM determine the appropriate level of funding for the reclamation/closure bond and the proposed long-term funding mechanism for the proposed Mount Hope Project; analyze the adequacy of the funding amount and mechanism, including associated uncertainties to ensure that sufficient funds would be available as long as they are needed;
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 6

include additional cap and liner controls in the WRDFs to provide more robust source control to protect water quality;
Disposition: Comment acknowledged; does not provide new information

Response

CC-060-PAG WRDF Design

Letter 941, Comment 7

analyze and revise the discussion of potential impacts to and mitigation measures associated with water resources, including their potential risks and anticipated effectiveness;
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 8

prepare more detailed monitoring and mitigation plans with established contingencies in the event that the project proponent is no longer financially capable of implementing essential mitigation measures.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 9

This information should be circulated in a Supplemental Draft EIS for public comment, in accordance with NEPA and CEQ's NEPA Implementation Regulations.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 941, Comment 10

EPA respectfully requests the opportunity to review this information and provide BLM our feedback before you publish the Supplemental Draft EIS.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 941, Comment 11

We recommend that BLM determine the appropriate level of funding for the Mount Hope LTFM and disclose the specific mechanism that will be established for the proposed project; analyze the adequacy of the funding amount and mechanism;
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 12

circulate this information in a Supplemental Draft EIS for public comment.
Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 941, Comment 13

We recommend BLM consider the following approaches to help ensure that the Mount Hope LTFM covers the costs of all necessary post-closure monitoring and operation and maintenance (O&M) obligations for as long as they may be needed, which we believe may be at least several hundred years.

Shift to current value trusts or use more realistic discount rates. BLM uses net present value (NPV) trusts (i.e., cost estimates

calculated using a discount rate). EPA allows for current value trusts (i.e., cost estimates calculated in current dollars) in many situations, and under this approach, the trust is fully funded immediately. Where NPV trusts are used, the single most important factor in calculating the beginning amount of the trust corpus (and therefore, the value of the trust in the future) is to use an appropriate discount rate. Overly aggressive discount rates "backload" contributions to the trust over time, and also limit true-up contributions. EPA suggests that BLM consider the use of current value trusts or NPV trusts with a standard benchmark discount rate as opposed to an individually negotiated rate. For example, EPA has authorized the 30-year Treasury Constant Maturity return for some trusts that allow for NPV.

Shift to annual true-up cycle. BLM requires adjustments, or "true-ups", to trust funds every three years if they are not meeting their growth performance goals. EPA strongly supports the idea of a true-up requirement, but recommends that BLM consider using an annual true-up cycle rather than a 3-year cycle, to address both problematic investment performance and the risk of grantor bankruptcy or other corporate failure more often. Catching either of these problems quickly (i.e., with a shorter true-up cycle) would ensure that the trust is better positioned to secure the appropriate funds to make the trust whole.

Consider a more conservative investment portfolio requirement. BLM imposes few limitations on the types of investments allowed for its trust funds. EPA generally imposes significant limitations on potential investments, especially when the trust is an NPV trust. We acknowledge that there is a downside to conservative investment strategies (namely, that the grantor contribution would likely increase), but believe, given the adverse consequences of trust failure for future taxpayers and/or the environment, that a conservative approach may be appropriate in this instance.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 14

It will be important to ensure that the tailings and waste rock disposal facility (WRDF) covers, evaporation ponds, and ET cells are conservatively maintained and rehabilitated/replaced and meet performance standards in perpetuity. We believe that excavation and disposal of ET cell fill and rehabilitation of ET cells will be needed, although the anticipated frequencies of these activities for each ET cell are unknown. Regular inspections and repairs of the tailings and WRDFs will be important, especially after storms and spring snowmelt, as will ongoing O&M and replacement of ponds, liners, draindown collection systems. The Draft EIS does not describe any of these activities nor identify them as post-closure obligations. Additional post-closure obligations will be needed as well, such as road and culvert maintenance; erosion repair and revegetation; maintenance of stormwater channels, retention ponds, and best management practices; water quality monitoring; site security; and associated equipment, materials and labor costs. In light of the monitoring and O&M needs to maintain the assumed performance during the post-closure period, we assume that a crew consisting of two full time employees and equipment and materials, as necessary, may be needed.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 15

The Supplemental Draft EIS should specify all of the post-closure monitoring, O&M, and replacement activities, and describe their performance standards. The Supplemental Draft EIS should also include the cost estimates for these activities, which will be used to estimate the LTFM obligations.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 16

It will, therefore, be important to ensure that funding exists for maintenance of surface water and groundwater monitoring stations and mitigation measures far into the future. While the Draft EIS and the appended Monitoring and Mitigation Plans give cursory mention of the need for long term funding to maintain these activities, development of post-closure funding is delayed for evaluation during the post-Project closure period (p. 3-99).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 17

The Supplemental Draft EIS should provide further detail in regards to the nature and likely expense of long term mitigation measures required for ensuring that surface water resources and senior water rights are maintained after the prescribed 30 year post-closure period.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 18

EPA believes that, particularly in light of the observed volatility of the molybdenum market, it is essential that the Draft EIS consider contingencies in the event that the mine should close prior to the anticipated completion of operations at year 44. EML has indicated that it has contracts for the sale of its product for the first 5 years of mining and milling and is negotiating for an additional 5 years of contracts. However, the proposed project has a 44 year active mining and milling period, only after which will much of the activity take place that is necessary to ensure that the long term impacts of the project are managed.
Disposition: Other (SEE RESPONSE)

Response

43 CFR 3809 requires that the BLM evaluate the project as proposed in the Plan of Operations, which is a project with a 44-year mine life. The Project would be bonded for an amount that would be sufficent to cover the reclamation and closure cost for the operation over the period the bond is designed to cover. No changes to the text of the FEIS have been made to address this comment.

Letter 941, Comment 19

The Supplemental Draft EIS should consider contingencies for purposes of estimating the net present value and/or current value of the LTFM in the event that the mine should close prior to the planned closure period.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 20

Although the Draft EIS considers the extent and propagation of the depression of groundwater levels near the pit and in the project well field area after the cessation of pumping at year 44, it contains no analysis as to the location and extent of drawdown levels should mining cease at some time prior to year 44. The location and extent of groundwater drawdown at various points in time prior to year 44 may affect the significance and timing of the potential impacts the project has on groundwater resources.
Disposition: Comment acknowledged; does not provide new information

Response

Modeling simulation results for years intermediate to the proposed mine life of 44 years are presented in detail in the more detailed hydrogeologic and modeling report, Montgomery et al (2010). As impacts are of a lesser degree for intermediate times, they are not incorporated specifically in the EIS. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 21

The Supplemental Draft EIS should analyze, discuss, and display the location and extent of groundwater drawdown levels at regular intervals during the active mining and milling period. It should also consider the propagation of drawdown levels and flow direction should dewatering and extraction from Kobeh Valley cease during any of the identified intervals.
Disposition: Other (SEE RESPONSE)

Response

The analysis in Section 3.2.3 of the EIS is based on the activities as proposed by EML. This analysis meets the requirements under NEPA and the BLM NEPA Handbook. Monitoring would be used during Project implementation to assess the development of potential water-related impacts and the propagation of the drawdown cone of depression.

Letter 941, Comment 22

We believe the PAG WRDF should be capped with a geomembrane or equivalent (see comments on pages 7 and 8 below),
Disposition: Comment acknowledged; does not provide new information

Response

CC-015-WRDF Cover Design

Letter 941, Comment 23

costs associated with this cover should be accounted for in both the closure/reclamation bond and the LTFM.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 24

We also note that the reclamation/closure cost estimate in the POO does not appear to include the cost for converting ponds into ET cells or netting for ponds during the closure period.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 25

In addition, the closure period is only considered 30 years in the POO. If active evaporation at the WRDF or tailings collection/evaporation ponds takes longer than 30 years, closure-related O&M costs would not be adequately covered.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 26

The Final EIS should include the estimated costs of all closure/reclamation obligations and mitigation measures for the proposed project. Closure/reclamation costs should include contingencies for collection/evaporation pond closure beyond 30 years.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 27

Although EPA appreciates the inclusion of this comprehensive table, the proposed monitoring and mitigation measures identified do not provide sufficient assurance that the potential impacts associated with the proposed groundwater consumption can or will be mitigated.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 28

It is unclear, based upon the Draft EIS and its appendices, what the source and water right for this water would be, given the Project's stated water needs. NEPA requires that an EIS discuss mitigation measures with "sufficient detail to ensure that environmental consequences have been fairly evaluated." An essential component of this discussion is an assessment of whether the proposed mitigation measures can be effective. Furthermore, Council on Environmental Quality (CEQ) guidance states that "to ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measures being implemented must also be discussed." We acknowledge that the Draft EIS attempts to convey the effectiveness of each proposed mitigation measure and the additional impacts that would occur due to mitigation in Table 3.2-9. However, without additional groundwater allocation for which EML does not currently hold the rights, it would seem that most, if not all, of the proposed mitigation for surface water impacts described in Table 3.2-9 would not be possible during the 44 year active mining and milling period. In the absence of these mitigations, the Project is anticipated to result in significant impacts to surface waters (Draft EIS, p. 3-86, Impact 3.2.3.3-2).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 941, Comment 29

In order for the feasibility, effectiveness, and long term viability of the proposed mitigations to be determined, the Supplemental Draft EIS should specify the source for all supplemental water proposed for use as mitigation. It should identify the owner(s) of all water rights to be utilized and the potential environmental consequences of additional groundwater extraction for mitigation purposes. If

EML would be required to divert this water out of its current groundwater allocation, the Supplemental Draft EIS should consider the potential consequences of this on the rate of mining and milling, the socioeconomics of the project, and other affected resource areas.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 30

In order to ensure that mitigation essential to the protection of the environment is available as soon as monitoring identifies a need, it is important that environmental impact statements consider in detail the additional impacts that may be associated with mitigation measures. If the EIS does not thoroughly analyze the environmental consequences of proposed mitigation measures, additional environmental review may be necessary before they can be implemented. In many cases, the environmental review process can be lengthy and where mitigation is time-critical, as is the case in regards to surface water resources for the proposed project, significant environmental harm could occur while the environmental review process is taking place.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 31

The Supplemental Draft EIS should analyze the potential environmental impacts associated with the mitigation measures proposed in the Draft EIS and its appendices at a level of detail sufficient to minimize, if not eliminate, the need for additional environmental review prior to implementation of mitigation.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-059-Impacts of Mitigation Implementation

Letter 941, Comment 32

It is unclear why the acreage and function of riparian habitat along these perennial waters have not been assessed. It seems likely that the amount of riparian habitat these waters support is substantial.
Disposition: Comment acknowledged; does not provide new information

Response

The BLM used the best available data for riparian areas located within the area of analysis. No revisions have been made in the EIS in response to this comment.

Letter 941, Comment 33

While this section of the Draft EIS goes on to state that mitigation for the loss of riparian vegetation is anticipated to be "effective to highly effective," it is impossible to determine the true effectiveness of these measures without a proper baseline assessment of the amount of riparian vegetation present in the anticipated impact area.
Disposition: Comment acknowledged; does not provide new information

Response

Based on the impact resulting from reduced flows, the replacement of flows can reasonably be expected to be mitigate impacts to riparian vegetation. No change has been made in the EIS in response to this comment.

Letter 941, Comment 34

As previously discussed, the Draft EIS provides insufficient information regarding the source and amount of supplemental water for use as mitigation. The proposed replacement of dying riparian vegetation at a 3:1 ratio with cuttings, plugs and seeds will not mitigate riparian habitat loss, if hydrology does not exist to support this habitat (p. 3-389).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 35

The Supplemental Draft EIS should include an analysis and discussion of the amount of riparian vegetation along Roberts and Henderson Creeks in order to provide a baseline condition so that potential impacts can be adequately predicted and appropriate mitigation measures can be identified. The potential destruction, reduction or deterioration of any and all riparian/wetland zones should be disclosed. The total acreage of wetland/riparian vegetation associated with potentially impacted surface waters should be

determined and the potential impacts to those communities should be described. Any measures that could mitigate the potential environmental impacts associated with this loss of habitat should be discussed and disclosed as required by 40 CFR 1502.14(f) & 1502.16(h).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 36

According to the Draft EIS, the proposed project would result in the direct loss of ephemeral and intermittent streams; however, the reach and extent of these waters have not been provided in the Draft EIS. Ephemeral stream channel flows contribute significantly to groundwater recharge in arid regions. Stormwater flows also provide seasonally significant surface water contributions to downstream waters. Collectively, in unaltered watersheds, storm flows are a significant source of water contributing to the base flow of downstream receiving waters. In addition, ephemeral and intermittent streams provide resting and forage for wildlife, and serve as important corridors for wildlife movement.

Recommendation: In order to fully assess the environmental impacts of the proposed project, the direct and indirect impacts associated with the loss of ephemeral and intermittent streams should be analyzed in the Supplemental Draft EIS.
Disposition: Comment acknowledged; does not provide new information

Response
The Proposed Action would result in effects to ephemeral streams due to land surface alteration at the TSF and at the WRDFs immediately surrounding the open pit. Stormwater and resultant flows in streams would not otherwise be affected by the project. The ephemeral drainages may contribute a small amount to ground water recharge, and provide a sporadic source of water to wildlife. Effects to ground water recharge are incorporated within the reporting of Project impacts, and result in an estimated recharge reduction of 38 acre-feet per year. Water supply to wildlife is not reliable from these sources. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 37

BLM should consider the appropriateness of the ten-foot groundwater table drawdown contour as the threshold for significance. If it is reasonable to anticipate that adverse environmental impacts could be associated with a drawdown of a lesser extent, the Supplemental Draft EIS should analyze that threshold. The Supplemental Draft EIS should disclose all resources likely to be affected by the proposed groundwater pumping under the revised significance threshold.
Disposition: Comment acknowledged; does not provide new information

Response
CC-096-Ten-Foot Isopleth

Letter 941, Comment 38

A new JD should be conducted for the Project and sent to the USACE and EPA for review consistent with current Rapanos guidance.
Disposition: Comment acknowledged; does not provide new information

Response
EML has requested that the USACE extend the verification of the jurisdictional determination (JD). The USACE has requested additional information prior to completing this verification. A new JD would be conducted if necessary as directed by the USACE.

Letter 941, Comment 39

The Supplemental Draft EIS should discuss the status of the JD and any ongoing dialog with the USACE in regards to this matter.
Disposition: Other (SEE RESPONSE)

Response
The following text has been added to the end of the first paragraph under Section 3.2.2.5: "EML has requested that the USACE extend their verification of the jurisdictional determination. The USACE has requested additional information prior to completing this verification."

Letter 941, Comment 40

modeled WRDF seepage estimates are not provided in the Draft EIS to support any conclusions for average to dry conditions or for wetter conditions during the periods either before or after closure of these facilities. Waste rock facilities that have very low average seepage one year may have orders of magnitude greater seepage the following year (for several weeks to several months) in response to wet conditions. It is unclear from the Draft EIS, therefore, that the proposed soil cover will provide source control essential to proper functioning of the seepage collection system and ET cell, which will be needed to protect water resources from PAG seepage.

Disposition: Comment acknowledged; does not provide new information

Response

The source control provided by the proposed soil cover is not essential to proper functioning of the seepage collection system as stated by the commenter. The proposed soil cover will store and release precipitation received during dry and normal years, and the modeling conducted by MWH Americas indicates that a greater thickness would not appreciably reduce infiltration. Thus, the proposed soil cover would effectively minimize potential infiltration. The proposed seepage collection and management system would not depend on the effectiveness of the soil cover but would be in addition to the soil cover. The lined collection system and ET cell would preclude release of any solution that did penetrate the soil cover, thus providing necessary and appropriate water resource protection. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 41

In light of the anticipated contaminant concentrations in the PAG seepage, EPA recommends the PAG WRDF be capped with a geomembrane or equivalent to provide more robust source control needed to protect water quality.
Disposition: Comment acknowledged; does not provide new information

Response

CC-015-WRDF Cover Design

Letter 941, Comment 42

The Supplemental Draft EIS should describe the modeling conducted to determine the full range of seepage volumes over time (i.e., throughout operations, closure/reclamation, and post-closure) from the PAG WRDF and LGO stockpile, and describe the modeling results. The discussion should also include:
• The fate and transport of constituents in the PAG WRDF and LGO stockpile seepage over the course of operations, closure, and post-closure; and
• How unintended and/or unmitigated releases of seepage from these facilities could affect surface water or groundwater quality.
Disposition: Comment acknowledged; does not provide new information

Response

Modeling of TSF draindown rates during operations and closure was used in development of the reclamation schedule and cost estimate, and is provided in Appendix 14 -3B of the Plan of Operations. PAG waste rock and low grade ore would be placed as dry material and significant draindown is not anticipated from either facility. All three of these facilities would be constructed with liners and solution collection systems to prevent seepage releases; analysis of a worst case scenario is not required. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 43

Modeled WRDF seepage estimates are not provided in the Draft EIS to support any conclusions regarding the seepage movement through the non-PAG WRDF during the periods either before or after closure of this facility. It is unclear, therefore, why the non-PAG WRDF would not also be lined.
Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 44

In light of the anticipated elevated concentrations of seepage from the non-PAG WRDF under non-acidic conditions, we believe the non-PAG WRDF should include a lined foundation, drainage network, and collection system similar to the system planned for the PAG WRDF.
Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 45

We also believe that a reliable method is needed to identify non-PAG waste rock with high potential to leach lead, zinc, and cadmium so that this material can be assigned to the PAG WRDF.
Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 46

A contingency measure should be included to convert the non-PAG sedimentation ponds into ET cells after closure should monitoring of seepage from the non-PAG WRDF during operations indicate the need to preclude it from being discharged to surface waters.
Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 47

The Supplemental Draft EIS should address these issues.

The Supplemental Draft EIS should describe the modeling conducted to determine the full range of seepage volumes over time from the non-PAG WRDF, and describe the modeling results. The discussion should also include:
• The fate and transport of constituents in the non-PAG WRDF seepage over the course of operations, closure, and post-closure; and
• How unintended and/or unmitigated releases of seepage from this facility could affect surface water or groundwater quality.
Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 48

The Draft EIS does not describe in detail the potential fate or impacts of underdrain and draindown solutions from the North and South Tailings Storage Facilities.
Disposition: Comment acknowledged; does not provide new information

Response

The predicted geochemical behavior of the tailings material is described in the 2008 Mount Hope Project Tailings Geochemical Characterization Report. This report concludes that the tailings material would contain a high amount of neutralization from the process solutions which would limit the acid generation and metal release from the tailings material. Another limiting factor is the encapsulation of a significant proportion of the sulfides inside non-reactive silicate minerals. A prediction of the constituent concentration of the tailings draindown solution was completed using USGS-developed software PHREEQC and predicts tailings draindown solutions with neutral pH (around 7 s.u.) and constituent concentrations below NDEP reference values for all constituents with the exception of aluminum, antimony, fluoride, iron and manganese throughout the life of operations, and elevated sulfate in the final years of operations.

The tailings facilities would be constructed with a geosynthetic liner such that no seepage from this facility would be released to the environment (i.e., a zero discharge facility). During closure and reclamation, the tailings would be covered to minimize long term infiltration into the tailings impoundments, which would reduce the quantity of pore water generated and potential environmental risk. An ET cell would be constructed to manage long-term draindown solution and prevent discharge to the environment. A fate-transport model that describes the potential for draindown solution from the tailings impoundment to impact groundwater is not necessary, and the EIS is not required to evaluate worst-case scenarios.

No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 49

because the draindown solutions in the ET cells are anticipated to be of "relatively good quality," the constituents that could potentially be taken up by vegetation are not likely to provide a risk to wildlife receptors; however, at the time of final permanent closure, a Screening Level Ecological Risk Assessment (SLERA) would be completed to determine the detailed risks based on the fluids present in the tailings storage facilities, and the design would be modified accordingly. None of the documents we have reviewed appear to support the statement that solutions in any of the ET cells will be of relatively good quality. For example, over time, the tailings will become acidic with elevated aluminum, antimony, arsenic, cadmium, fluoride, manganese, molybdenum and sulfate concentrations (Draft EIS, p. 2-53). Seepage from the PAG WRDF is expected to contain elevated concentrations of aluminum, arsenic, cadmium, fluoride, manganese, nickel, zinc, copper, iron, lead, beryllium, thallium, selenium, sulfate, and total dissolved solids; and seepage from the non-PAG WRDF may have high levels of iron, manganese, aluminum, arsenic, fluoride, nickel, zinc, and cadmium (Draft EIS, section 3.3.2.2.3). EPA believes an ecological risk assessment should be conducted as part of the NEPA process.
Disposition: Not within agency’s jurisdiction (SEE RESPONSE)

Response

CC-013-Wildlife

Letter 941, Comment 50

The potential risks associated with the ET cells should be determined and disclosed in the Supplemental EIS so that appropriate mitigation measures can be developed and disclosed, and the reclamation/closure and post-closure costs can be estimated for inclusion in the financial assurance for the project.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 51

Appropriate modeling and analysis should be conducted to determine the potential fate and impacts of constituents in the seepage and draindown solutions from the WRDFs (including the non-PAG WRDF), LGO stockpile, and tailings over the course of closure and post-closure, as well as the ecological risks posed by their ET cells.
Disposition: Not within agency's jurisdiction (SEE RESPONSE)

Response

CC-013-Wildlife

Letter 941, Comment 52

The Supplemental Draft EIS should provide the following information:

• Identify the constituents and their potential concentration ranges anticipated in the seepage and draindown solutions over the course of operations, reclamation/closure, and post-closure.
• Describe and discuss the potential problems that could result from contaminants concentrated in the ET cells after closure.
• Describe plans for vegetating the ET cells, and discuss whether changing draindown rates over time would be expected to result in changes in species types and densities for each ET cell.
• For each ET cell, describe the initial and total anticipated loading of metals and other contaminants, whether they are expected to plug up over the long term, whether they will need to be occasionally excavated, and if so, how frequently. This discussion should be supported with the results of modeling conducted to address these issues.
• For each ET cell that may need to be excavated, describe how excavated ET fill would be disposed and ET cells reconstructed and maintained.
• Describe the plant and animal exposure pathways for constituents from draindown solution in each of the ET cells, and any unintended ponding that may occur.
• Discuss whether anticipated concentrations of contaminants from any of the pathways would be harmful to plants or wildlife.
• Describe the potential contaminant uptake and bioaccumulation predicted for plants, invertebrates, and other wildlife in the ET cells. The discussion should address all potential pathways, including the ET cell fill (tailings) and growth medium as precipitates, metals, and salts accumulate, as well as any ponding that may occur.
• Discuss whether vegetation would need to be occasionally harvested in order to reduce bioaccumulation of metals in the food web, and at what frequency, based on modeling conducted to address these issues. Address whether and how the timing of ET cell excavations could affect the timing and need for vegetation harvests.
• Describe methods that would be used to exclude wildlife (e.g., netting and fencing) from the ET cells or any ponded water to minimize risks to wildlife during operations, closure, and/or post-closure.
Disposition: Comment acknowledged; does not provide new information

Response

ET cells are conservatively designed so that solution can be evaporated within the surface area provided. Thus, solution evaporation is not dependent on vegetation densities or vigor. The ET cells would be lined so that determination of precise influent chemistry is not necessary. As stated in the Plan of Operations (Section 4.P) costs to replace ET cell backfill would be included in a long-term funding mechanism. The timing for rehabilitation of the ET cells would be based on the modeled draindown rates that were used to develop the reclamation schedules and closure plans. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 53

The Draft EIS contains several inconsistencies and/or items that need clarification regarding the PAG and non-PAG collection channels and ponds. For example, page 2-58 describes the PAG and non-PAG WRDF diversion and collection channels as being lined with 60-mil HDPE. The Mount Hope Project Stormwater Management Plan (SRK, July 2011) indicates, however, that the non-PAG WRDF collection channels will be lined with geomembrane in steeper areas and rip-rap in less steep areas where the channels flow into sediment retention basins. Figures 2.1.10 and 2.1.19 in the Draft EIS depict the collection channel at the toe of the non-PAG WRDF as an unlined diversion channel with rip-rap and the PAG WRDF collection/diversion channel with compacted low permeability base and rip-rap. These figures do not indicate use of geomembranes. Page 2-84 of the Draft EIS indicates that the collection pond for the PAG WRDF will be lined with a geomembrane but does not indicate whether the non-PAG collection pond would be lined with a geomembrane.

Disposition: Comment acknowledged; does not provide new information

Response

The collection ditches and ponds for the PAG WRDF and LGO Stockpile would be geomembrane lined. The collection ditches for the non-PAG would be lined in steep areas as needed to provide erosion protection. The sedimentation ponds for the non-PAG would not be lined with geomembrane. The EIS and Stormwater Management Plan accurately describe these proposed design features. No change has been made in the EIS in response to this comment.

Letter 941, Comment 54

EPA recommends that the PAG and non-PAG WRDF collection channels and ponds be lined with a geomembrane.
Disposition: Comment acknowledged; does not provide new information

Response

Collection channels and ponds associated with the PAG WRDF would be lined with geomembrane as described in the Plan of Operations and EIS. The proposed design of the non-PAG collection channels includes geomembrane liner for steeper portions to provide erosion protection for the integrity of the channels. The modeled solution quality that would result from drainage through the non-PAG waste rock does not otherwise warrant lining of the channels and ponds for this facility. No change has been made in the EIS in response to this comment.

Letter 941, Comment 55

The Supplemental Draft EIS should rectify the discrepancies identified above.
Disposition: Other (SEE RESPONSE)

Response

Comment noted.

Letter 941, Comment 56

For purposes of planning post-closure obligations (e.g., ET cell O&M and excavations) and estimating post-closure costs, EPA recommends the more conservative draindown response curves be used. In addition, contingencies should be applied for greater than anticipated draindown during wet periods (500-yr event, rain-on-snow storm event, or a wet period preceding a large storm), which could lead to increased draindown reporting to the ponds and ET cells.
Disposition: Comment acknowledged; does not provide new information

Response

CC-060-PAG WRDF Design

Letter 941, Comment 57

The Draft EIS states that the run-on diversion channel for the North Tailings Facility will not be designed until two years before closure.
Disposition: Comment acknowledged; does not provide new information

Response

CC-106-Run-on Channel Design

Letter 941, Comment 58

The Supplemental Draft EIS should provide a general description of the proposed run-on channel and depict it in maps of the proposed mine facilities.
Disposition: Comment acknowledged; does not provide new information

Response

CC-106-Run-on Channel Design

Letter 941, Comment 59

Although EPA agrees that an adaptive management approach is appropriate in cases where significant uncertainty remains despite a good faith effort to perform thorough upfront environmental analysis, as in this case, we have serious concerns that these monitoring and mitigation plans are insufficient to ensure that water resources would be adequately protected in the long term.

In regards to surface water resources, the text of Section 3.2.3.3 states that "if monitoring indicated that flow reduction of perennial surface waters are occurring… the following measures would be implemented…" (p. 3-86). In contrast, the Mitigation Plan relies upon Table 3.2-9 of the Draft EIS for identification of site specific measures. This table states that mitigation would be triggered by a "cessation in flow coincident with a reduction in ground water levels in this area". This mitigation trigger is applied for nearly all

surface water resources, including Roberts Creek, which experiences flow rates in excess of 6,500 gallons per minute (p. 3-96). EPA objects to the use of cessation of flow as the trigger for implementation of measures essential to ensuring the continued flow of surface waters. Should surface water resources be allowed to run completely dry before BLM or EML even begins the process of further analyzing site specific mitigation (Appendix C, page C-4), it seems unavoidable that the riparian habitat and beneficial wildlife, livestock, and human uses associated with these surface waters would be severely and adversely impacted. In addition, this mitigation trigger directly contradicts the stated goal of the monitoring program at Item 10, which states that this Plan would "provide an early warning before project impacts become unmanageable" (Appendix B, page 2).
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 60

According to the Draft EIS, impacts resulting from the pumping of groundwater in Kobeh Valley under the proposed project would persist for over 100 years, while those associated with the pit dewatering operations would remain for a period greater than 400 years. In fact, even after the 400 year period modeled, the groundwater table drawdown associated with pit dewatering displays only a mild contraction in total area. Despite this, Mitigation Measures 1 and 3 for Surface Water Resources in Appendix C discuss long term impacts associated with the project as uncertainties that would need further analysis to assess. Responsibility for monitoring and mitigation is required of EML for only a 30 year period after the cessation of mining and milling operations, and additional analysis of the nature of longer term measures to ensure maintenance of surface water resources is delayed until the mine closure period. Considering the scale and duration of potential impacts associated with this project, it seems unavoidable that much longer term mitigation measures will be necessary if surface water resources are to be maintained. As such, the current discussion regarding long term surface water maintenance activities is insufficiently vague and does not provide firm enough commitments to guarantee long term protections.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 61

BLM should require mitigation to be triggered by any reduction in flow attributable to mine-induced drawdown of groundwater levels. Table 3.2.9 should be revised to reflect this requirement. The Supplemental Draft EIS should require that trend analysis be an ongoing element of the water quantity monitoring plan so that, as reductions in water quantity are detected, they can be investigated and mitigation measures can be implemented in an expedited fashion.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 62

The Supplemental Draft EIS should also provide firmer commitment to long term surface water mitigation measures.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-062-Mitigation of Diminished Water Flows

Letter 941, Comment 63

We were unable to find any additional discussion of water quality monitoring or identification of water quality monitoring sites in the Draft EIS. Tables 6-12 and 6-13 in the POO identify several wells and facility fluid collection areas that would be monitored, but for only the mine closure period, and for only up to 30 years. These tables do not include monitoring of the pit lake or WRDF seepage and draindown solutions.

Recommendations: BLM should require water quality monitoring of groundwater, springs (including the spring drainage from under the non-PAG WRDF and adjacent to the PAG WRDF), stormwater, seepage collection ponds, other surface expressions of water, and ET cells. Such monitoring will be critical to ensuring that the mine facilities are working properly and that measures can be taken quickly to rectify problems if adverse water quality trends are detected. EPA believes that all of this monitoring, as well as pit lake monitoring, will likely be needed for hundreds of years after closure. For planning and cost estimation purposes, water quality and flow monitoring at the mine should be required in perpetuity.
Disposition: Analysis modified (SEE RESPONSE)

Response
CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 64

The Supplemental Draft EIS should include a detailed table identifying all groundwater, surface water, and mine facility locations that will be monitored throughout mine operations, closure/reclamation, and post-closure. The table should identify the parameters to be monitored, frequency of monitoring and reporting, and the standards that will need to be met for each parameter in each setting. Trend analysis should be an ongoing element of the water quality monitoring plan so that, as water quality trends are detected, they can be investigated and appropriate mitigation measures can be implemented promptly.
Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 941, Comment 65

We were unable to find a map anywhere in the Draft EIS or POO depicting the mine facilities with an overlay of the proposed water quality and water quantity monitoring locations. This compounds the lack of clarity regarding which sites and facilities will be monitored, whether the proposed monitoring sites are the most appropriate, and whether additional or alternate monitoring locations may be needed.
Disposition: Other (SEE RESPONSE)

Response

The BMRR has responsibility for ground water protection in the State of Nevada and would require appropriate monitoring pursuant to the Water Pollution Control Permit. The monitoring locations can be requested from the Battle Mountain BLM Office. No change to the text of the FEIS has been made to address this comment.

Letter 941, Comment 66

The Supplemental Draft EIS and Monitoring Plan should provide one or more maps depicting the locations of all monitoring sites for both water quality and water quantity overlaid on the mine facilities and appurtenances. The identifying labels for each monitoring location on the maps should be consistent with the identifying labels for each monitoring location in the Monitoring Plan.
Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 941, Comment 67

Monitoring should address the integrity of the WRDF cap/covers, solution collection systems, evaporation ponds, and ET cells; the water quality of the collected solutions, groundwater, stormwater, and any other surface water expressions in the vicinity of, or potentially associated with, the WRDFs; and the composition of the ET cell growth medium, pore water, and vegetation from the standpoint of bioaccumulation and ecological risk. Such monitoring should continue in perpetuity.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 68

The Mitigation Summary Plan provides neither the action levels that would trigger measures to rectify water quality deterioration problems, nor the mitigation measures that would be implemented in each case.

Recommendation: The detailed monitoring table recommended above should also specify the Action Levels for each water quality parameter in each setting. Action Levels should be established to trigger investigation and mitigation measures before standards are exceeded to ensure continued protection of water quality. The Mitigation Summary Plan should provide specific mitigating actions to be implemented in the event that monitoring identifies mine-related degradation of surface water or ground water quality.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 69

EPA is not clear why the Mount Hope Monitoring Plan and Mitigation Plan have been separated rather than being presented as a single Monitoring and Mitigation Plan. Monitoring and mitigation should work seamlessly together to identify and rectify environmental impacts before problems become unmanageable. Organizing these plans individually reduces clarity and introduces the possibility for inconsistency.

Recommendation: The Monitoring Plan and Mitigation Plan should be joined into a Monitoring and Mitigation Plan that provides a more comprehensive approach to controlling and preventing environmental contamination.
Disposition: Other (SEE RESPONSE)

Response

The Water Resources Monitoring Plan, developed with input from agencies and stakeholders, is part of the Plan of Operations and thus is part of the Proposed Action. In the case of impacts to water resources, mitigation has been developed by BLM resource specialists in response to the Proposed Action and becomes part of the EIS. The necessary result is two seperate documents, however, the separation of these two components does not prevent them from working "…seamlessly together to identify and rectify environmental impacts before problems become unmanageable." No change to the text of the FEIS has been made to address this comment.

Letter 941, Comment 70

The Draft EIS estimates substantial loss of phreatophytic vegetation as a consequence of drawdown of groundwater table levels. This change in vegetative coverage may increase the amount of windblown dust particulate emissions in the region. While the Draft EIS makes no statement as to the significance of these emissions, it is possible that they could have significant adverse impacts on local and regional air quality. However, because no evaluation of this impact has been provided, no conclusions can be made regarding the severity of these emissions in relation to the National Ambient Air Quality Standards (NAAQS) for particulate matter 10 microns or less (PM10), or for particulate matter 2.5 microns or less (PM2.5).
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 941, Comment 71

The Supplemental Draft EIS should discuss the anticipated particulate emissions associated with the loss of vegetative communities due to groundwater drawdown. While there may not be an emissions factor for estimating emissions from this source, it is often possible to develop an emission factor based on site-specific geologic conditions that would generate a more accurate emissions estimate. We recommend BLM's air quality analysts consult with windblown dust experts from the Nevada research community, whom we are aware have done extensive wind-blown dust studies, to develop site-specific emissions factors.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 941, Comment 72

The proposed Mount Hope Mine would toll roast molybdenum ore from other mines, involving delivery of up to seven 22-ton capacity highway trucks per day, and off-site transport of up to nine 22-ton capacity highway trucks every two days. The Draft EIS does not include additional information regarding the potential sources of this off-site ore or the estimated vehicle miles traveled associated with it. It is also unclear whether the emissions associated with on-site and off-site delivery of toll roast ore, process chemicals, fuels, etc., have been accounted for in the criteria pollutant emissions estimates for the proposed project and alternatives.
Disposition: Other (SEE RESPONSE)

Response

The identification of the potential sources of these off-site (toll) ores is not possible and cannot be quantified. NEPA does not require the EIS to speculate on potential sources of ore concentrate. Any processing of these ores through the roaster would have to be done based on the current permit limits in the Project Air Quality Operating Permit which has been issued by the NDEP. Section 3.6 of the EIS discloses the potential air quality impacts associated with the current Project design and Air Quality Operating Permit.

Letter 941, Comment 73

The Supplemental Draft EIS should describe the direct, indirect, and cumulative air impacts associated with the project. The discussion should include the potential toll roast ore sources, and estimates of the vehicle miles traveled and criteria pollutant emissions associated with all aspects of the project including: toll roast ore, process chemicals, fuels, and other materials.
Disposition: Other (SEE RESPONSE)

Response

The potential direct and indirect effects from the Proposed Action are disclosed under Section 3.6.3. The potential cumulative effects are disclosed under Section 4.5.6. Nevada has authority to regulate air quality and the Project would be subject to the conditions of an NDEP-issued air quality permit to ensure adherence to all applicable limits and pollution controls. No changes to the text of the FEIS have been made to address this comment.

Letter 941, Comment 74

In a discussion of roaster off gas emissions, the Draft EIS (p. 2-42) does not identify any hazardous air pollutants (HAP) associated with the proposed Mount Hope roasters. Lead, mercury, arsenic, antimony, cadmium, selenium, nickel and manganese may be associated with molybdenum roaster emissions. HAPs concentrations in molybdenum concentrate vary from mine to mine, and it is unclear from Section 3.6, Air and Atmospheric Values, whether HAPs from toll roasting of ore from other mines were accounted for in the HAPs emissions estimates in Table 3.6-10.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 941, Comment 75

Table 3.6-10 in the Supplemental Draft EIS should include estimated HAPs emissions from the Mount Hope roasters for all sources of concentrate, i.e., from the Mount Hope mill and from offsite mines.
Disposition: Other (SEE RESPONSE)

Response

The best available information was used in the DEIS to develop the information presented in Table 3.6-10. No change to the text of the FEIS has been made to address this comment.

Letter 941, Comment 76

Even when projects are expected to meet all NAAQS, we encourage agencies to explore mitigation measures that can further reduce emissions of criteria pollutants. Several mitigation measures exist to reduce particulate matter, nitrogen dioxide (NO2), ozone precursors, and other HAPs.

Recommendations: In addition to the dust control measures mentioned in the Draft EIS (p. 2-65), EPA recommends the following mitigation measures be included in the Supplemental Draft EIS in order to reduce impacts associated with emissions of particulate matter, NOx, ozone, and other toxics from mining activities:
• Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;
• Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;
• If practicable, lease new, clean equipment meeting the most stringent of applicable Federal standards . In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible ;
• Lacking availability of non-road construction equipment that meets Tier 4 engine standards, EML should commit to using best available control technology to reduce emissions of diesel particulate matter and other pollutants at the mine site; and
• Consider alternative fuels such as natural gas and electricity (plug-in or battery).
Disposition: Other (SEE RESPONSE)

Response

Comment noted.

Letter 941, Comment 77

It is unclear based upon the information presented in the Draft EIS whether all potential sources of NO2 have been accounted for in the model. Section 3.6.3.2, which summarizes the modeling protocols employed for the project, only discusses particulate emissions rather than all Clean Air Act criteria pollutants associated with the project.

Recommendation: Ensure that all sources of NO2 have been accounted for in the model. Provide additional information in Section 3.6.3.2.1 summarizing the modeling protocols employed for all criteria pollutants associated with the project, not just particulate emissions.
Disposition: Other (SEE RESPONSE)

Response

All Project sources of NO2 have been included in the air quality impact analysis.

Letter 941, Comment 78

The Draft EIS (p. 3-254) indicates that EPA would update the 8-hour ozone standard in late 2011. The standard was revised on March 12, 2008 to 0.075 parts per million, which is the current standard. EPA is proceeding with designating new nonattainment areas for the 2008 8-hour ozone standard. There are no new nonattainment areas in Nevada for the 2008 8-hour ozone standard.
Recommendation: The FEIS should update this language.
Disposition: Factual correction made (SEE RESPONSE)

Response

The text is Section 3.6.1.1 has been revised to read "...a proposed standard is expected in 2013 or later." In addition, the value in Table 3.6-1 has been revised to read "0.075".

2.0 Grouped Comments and Responses

CC-001-General Support

Commenters express general support for the Mount Hope Project. Commenters do not provide any specific comments on the EIS.

Response

General support for the Project noted.

Comments

Letter 1 Comment 1, Letter 3 Comment 1, Letter 4 Comment 1, Letter 5 Comment 1, Letter 6 Comment 1, Letter 8 Comment 1, Letter 9 Comment 1, Letter 10 Comment 1, Letter 11 Comment 1, Letter 12 Comment 1, Letter 13 Comment 1, Letter 14 Comment 1, Letter 15 Comment 1, Letter 16 Comment 1, Letter 17 Comment 1, Letter 18 Comment 1, Letter 19 Comment 1, Letter 20 Comment 1, Letter 21 Comment 1, Letter 22 Comment 1, Letter 23 Comment 1, Letter 24 Comment 1, Letter 25 Comment 1, Letter 26 Comment 1, Letter 27 Comment 1, Letter 28 Comment 1, Letter 29 Comment 1, Letter 30 Comment 1, Letter 31 Comment 1, Letter 32 Comment 1, Letter 33 Comment 1, Letter 34 Comment 1, Letter 35 Comment 1, Letter 36 Comment 1, Letter 37 Comment 1, Letter 38 Comment 1, Letter 39 Comment 1, Letter 40 Comment 1, Letter 41 Comment 1, Letter 42 Comment 1, Letter 43 Comment 1, Letter 44 Comment 1, Letter 45 Comment 1, Letter 46 Comment 1, Letter 47 Comment 1, Letter 48 Comment 1, Letter 49 Comment 1, Letter 50 Comment 1, Letter 51 Comment 1, Letter 52 Comment 1, Letter 53 Comment 1, Letter 54 Comment 1, Letter 55 Comment 1, Letter 56 Comment 1, Letter 57 Comment 1, Letter 58 Comment 1, Letter 59 Comment 1, Letter 60 Comment 1, Letter 61 Comment 1, Letter 62 Comment 1, Letter 63 Comment 1, Letter 64 Comment 1, Letter 65 Comment 1, Letter 66 Comment 1, Letter 67 Comment 1, Letter 68 Comment 1, Letter 69 Comment 1, Letter 70 Comment 1, Letter 71 Comment 1, Letter 72 Comment 1, Letter 73 Comment 1, Letter 74 Comment 1, Letter 75 Comment 1, Letter 76 Comment 1, Letter 77 Comment 1, Letter 78 Comment 1, Letter 79 Comment 1, Letter 80 Comment 1, Letter 81 Comment 1, Letter 82 Comment 1, Letter 83 Comment 1, Letter 84 Comment 1, Letter 85 Comment 1, Letter 86 Comment 1, Letter 87 Comment 1, Letter 88 Comment 1, Letter 89 Comment 1, Letter 90 Comment 1, Letter 91 Comment 1, Letter 92 Comment 1, Letter 93 Comment 1, Letter 94 Comment 1, Letter 95 Comment 1, Letter 96 Comment 1, Letter 97 Comment 1, Letter 98 Comment 1, Letter 99 Comment 1, Letter 100 Comment 1, Letter 101 Comment 1, Letter 102 Comment 1, Letter 103 Comment 1, Letter 104 Comment 1, Letter 105 Comment 1, Letter 106 Comment 1, Letter 107 Comment 1, Letter 108 Comment 1, Letter 109 Comment 1, Letter 110 Comment 1, Letter 111 Comment 1, Letter 112 Comment 1, Letter 113 Comment 1, Letter 114 Comment 1, Letter 115 Comment 1, Letter 116 Comment 1, Letter 117 Comment 1, Letter 118 Comment 1, Letter 119 Comment 1, Letter 120 Comment 1, Letter 121 Comment 1, Letter 122 Comment 1, Letter 123 Comment 1, Letter 124 Comment 1, Letter 125 Comment 1, Letter 126 Comment 1, Letter 127 Comment 1, Letter 128 Comment 1, Letter 129 Comment 1, Letter 130 Comment 1, Letter 131 Comment 1, Letter 132 Comment 1, Letter 133 Comment 1, Letter 134 Comment 1, Letter 135 Comment 1, Letter 136 Comment 1, Letter 137 Comment 1, Letter 138 Comment 1, Letter 139 Comment 1, Letter 140 Comment 1, Letter 141 Comment 1, Letter 142 Comment 1, Letter 143 Comment 1, Letter 144 Comment 1, Letter 145 Comment 1, Letter 146 Comment 1, Letter 147 Comment 1, Letter 148 Comment 1, Letter 149 Comment 1, Letter 150 Comment 1, Letter 151 Comment 1, Letter 152 Comment 1, Letter 153 Comment 1, Letter 154 Comment 1, Letter 155 Comment 1, Letter 156 Comment 1, Letter 157 Comment 1, Letter 158 Comment 1, Letter 159 Comment 1, Letter 160 Comment 1, Letter 161 Comment 1, Letter 162 Comment 1, Letter 163 Comment 1, Letter 164 Comment 1, Letter 165 Comment 1, Letter 166 Comment 1, Letter 167 Comment 1, Letter 168 Comment 1, Letter 169 Comment 1, Letter 170 Comment 1, Letter 171 Comment 1, Letter 172 Comment 1, Letter 173 Comment 1, Letter 174 Comment 1, Letter 175 Comment 1, Letter 176 Comment 1, Letter 177 Comment 1, Letter 178 Comment 1, Letter 179 Comment 4, Letter 180 Comment 1, Letter 181 Comment 1, Letter 182 Comment 1, Letter 184 Comment 1, Letter 185 Comment 1, Letter 186 Comment 1, Letter 187 Comment 1, Letter 188 Comment 1, Letter 189 Comment 1, Letter 190 Comment 1, Letter 191 Comment 1, Letter 192 Comment 1, Letter 193 Comment 1, Letter 194 Comment 1, Letter 195 Comment 1, Letter 196 Comment 1, Letter 197 Comment 1, Letter 198 Comment 1, Letter 199 Comment 1, Letter 200 Comment 1, Letter 201 Comment 1, Letter 202 Comment 1, Letter 203 Comment 1, Letter 204 Comment 1, Letter 205 Comment 1, Letter 206 Comment 1, Letter 207 Comment 1, Letter 208 Comment 1, Letter 209 Comment 1, Letter 210 Comment 1, Letter 211 Comment 1, Letter 212 Comment 1, Letter 213 Comment 1, Letter 214 Comment 1, Letter 215 Comment 1, Letter 216 Comment 1, Letter 217 Comment 1, Letter 218 Comment 1, Letter 219 Comment 1, Letter 220 Comment 1, Letter 221 Comment 1, Letter 222 Comment 1, Letter 224 Comment 1, Letter 225 Comment 1, Letter 226 Comment 1, Letter 227 Comment 1, Letter 228 Comment 1, Letter 230 Comment 1, Letter 231 Comment 1, Letter 232 Comment 1, Letter 234 Comment 1, Letter 235 Comment 1, Letter 236 Comment 1, Letter 237 Comment 1, Letter 238 Comment 1, Letter 239 Comment 1, Letter 240 Comment 1, Letter 241 Comment 1, Letter 242 Comment 1, Letter 243 Comment 1, Letter 244 Comment 1, Letter 245 Comment 1, Letter 246 Comment 1, Letter 247 Comment 1, Letter 248 Comment 1, Letter 255 Comment 1, Letter 256 Comment 1, Letter 257 Comment 1, Letter 258 Comment 1, Letter 263 Comment 1, Letter 264 Comment 1, Letter 266 Comment 1, Letter 273 Comment 1, Letter 276 Comment 1, Letter 277 Comment 1, Letter 278 Comment 1, Letter 279 Comment 1, Letter 280 Comment 1, Letter 281 Comment 1, Letter 282 Comment 1, Letter 283 Comment 1, Letter 284 Comment 1, Letter 285 Comment 1, Letter 286 Comment 1, Letter 287 Comment 1, Letter 288 Comment 1, Letter 289 Comment 1, Letter 290 Comment 1, Letter 291 Comment 1, Letter 292 Comment 1, Letter 293 Comment 1, Letter 294 Comment 1, Letter 307 Comment 1, Letter 308 Comment 1, Letter 309 Comment 1, Letter 310 Comment 1, Letter 311 Comment 1, Letter 312 Comment 1, Letter 313 Comment 1, Letter 314 Comment 1, Letter 315 Comment 1, Letter 316 Comment 1, Letter 317 Comment 1,

Letter 327 Comment 1, Letter 328 Comment 1, Letter 329 Comment 1, Letter 330 Comment 1, Letter 331 Comment 1, Letter 336 Comment 1, Letter 337 Comment 1, Letter 338 Comment 1, Letter 339 Comment 1, Letter 340 Comment 1, Letter 341 Comment 1, Letter 342 Comment 1, Letter 343 Comment 1, Letter 344 Comment 1, Letter 345 Comment 1, Letter 346 Comment 1, Letter 347 Comment 1, Letter 348 Comment 1, Letter 349 Comment 1, Letter 350 Comment 1, Letter 351 Comment 1, Letter 352 Comment 1, Letter 353 Comment 1, Letter 354 Comment 1, Letter 355 Comment 1, Letter 356 Comment 1, Letter 357 Comment 1, Letter 358 Comment 1, Letter 364 Comment 1, Letter 365 Comment 1, Letter 366 Comment 1, Letter 367 Comment 1, Letter 387 Comment 1, Letter 388 Comment 1, Letter 389 Comment 1, Letter 389 Comment 2, Letter 389 Comment 3, Letter 389 Comment 4, Letter 399 Comment 1, Letter 400 Comment 1, Letter 408 Comment 1, Letter 795 Comment 1, Letter 800 Comment 1, Letter 810 Comment 1, Letter 811 Comment 1, Letter 812 Comment 1, Letter 814 Comment 1, Letter 815 Comment 1, Letter 817 Comment 1, Letter 818 Comment 1, Letter 821 Comment 1, Letter 822 Comment 1, Letter 835 Comment 7, Letter 837 Comment 1, Letter 842 Comment 1, Letter 843 Comment 1, Letter 846 Comment 1, Letter 856 Comment 1, Letter 866 Comment 1, Letter 867 Comment 1, Letter 869 Comment 1, Letter 870 Comment 1, Letter 871 Comment 1, Letter 872 Comment 1, Letter 873 Comment 1, Letter 875 Comment 1, Letter 876 Comment 1, Letter 877 Comment 1, Letter 878 Comment 1, Letter 879 Comment 1, Letter 880 Comment 1, Letter 881 Comment 1, Letter 882 Comment 1, Letter 883 Comment 1, Letter 884 Comment 1, Letter 886 Comment 1, Letter 887 Comment 1, Letter 888 Comment 1, Letter 889 Comment 1, Letter 890 Comment 1, Letter 891 Comment 1, Letter 892 Comment 1, Letter 893 Comment 1, Letter 894 Comment 1, Letter 895 Comment 1, Letter 896 Comment 1, Letter 897 Comment 1, Letter 898 Comment 1, Letter 900 Comment 1, Letter 901 Comment 1, Letter 902 Comment 1, Letter 904 Comment 1, Letter 905 Comment 1, Letter 909 Comment 1, Letter 910 Comment 1, Letter 911 Comment 1, Letter 912 Comment 1, Letter 914 Comment 1, Letter 915 Comment 1, Letter 916 Comment 1, Letter 917 Comment 1, Letter 918 Comment 1, Letter 919 Comment 1, Letter 920 Comment 1, Letter 921 Comment 1, Letter 922 Comment 1, Letter 923 Comment 1, Letter 924 Comment 1, Letter 925 Comment 1, Letter 925 Comment 3, Letter 926 Comment 1, Letter 927 Comment 1, Letter 929 Comment 1, Letter 930 Comment 1, Letter 932 Comment 1, Letter 933 Comment 1, Letter 934 Comment 1, Letter 935 Comment 1, Letter 936 Comment 1, Letter 937 Comment 1, Letter 938 Comment 1, Letter 939 Comment 1, Letter 940 Comment 1

CC-002-Socioeconomics General Disruption

Commenter expressed concern that the socioeconomic analysis favors the generation of tax revenue that does not recognize the social aspects of socioeconomics. The EIS fails to acknowledge that tax revenue is not Eureka County's primary concern.

Response

Effects on Social Conditions and Affected Publics are discussed in Section 3.17.3.3.6. As stated in that section, there are no significance criteria for determining impacts on social conditions and affected publics. The EIS analyzes impacts on social conditions and affected publics throughout the document.

In addition, a community opinion survey was conducted in April 2010 for the Mount Hope Project. The survey showed that approximately 89 percent of respondents were supportive or very supportive of mining in Eureka County, and the reasons for support included increased job opportunities, economic development, and increased tax revenue. In addition, approximately 74 percent of respondents were supportive or very supportive of the Mount Hope Project.

The text at the end of Section 3.17.2.2.6 has been modified to incorporate this public opinion survey of the residents of Eureka County (McDowell Group 2010) as follows, "A telephone survey of Eureka County residents was conducted in April 2010 to gauge residents opinion on the Project. A total of 680 telephone numbers were called, which represents nearly all households in the greater Eureka, Crescent Valley, and Diamond Valley areas, and 219 responses to the survey were received. Of the 219 responses, 51 percent lived in Eureka, 24 percent lived in Crescent Valley, 20 percent lived in Diamond Valley, three percent lived in Beowawe, and two percent lived in Pine Valley. Nearly three-quarters of the area residents (74 percent) were supportive of the Project development, including 33 percent who were "very" supportive. Fifteen percent of the residents were opposed and 11 percent did not know or declined to respond. Of the 15 percent who opposed to Project, approximately half cited competition for water/bad for farms as their reason, while 21 percent mentioned population growth and 18 percent mentioned water pollution. Among the 74 percent who support the Project, the most important factor (42 percent) was the addition of new, high-paying jobs to the area, followed by increased revenues for local businesses (27 percent), providing minerals and metals our country needs (12 percent), and more tax revenues for local government (11 percent) (McDowell 2010)."

The analysis in Section 3.17.3.3.6 discloses the type and magnitude of anticipated impacts and is not intended to draw conclusions about residents preferences. Overall socioeconomic stability of the entire region is outside the scope of this analysis. Also, the decrease in operational employment would be approximately 30 percent, which is not substantially different from the Proposed Action. The EIS states that generally the same number of employees are needed to operate and maintain the mill, leading to no appreciable decrease in employee numbers. Additionally, the Proposed Action mine life is already 44 years, which is almost four times (assuming average mine life is 12 years) as long as most open pit mine operations in Nevada.

Comments

Letter 803 Comment 15, Letter 803 Comment 76, Letter 803 Comment 294

CC-003-Socioeconomics School Enrollment

Commenter expressed concern about the values used for school enrollment in the analysis. The values used are too low. The timeframes used for the collected data are not representative of the school enrollment.

Response

Section 3.17.3.3.4 includes a subsection specifically describing the school enrollment sensitivity analysis. Scenario 3 of the sensitivity analysis provides for the upper bound of potential population effects from the Project, and accounts for an increased total enrollment at the elementary school of 233 students, and an increased total enrollment at the middle/senior high school of 80 students. When added to the Fall 2009-2010 total enrollment numbers, the increases anticipated under Scenario 3 would be below the schools' maximum capacities. The EIS discloses that if increases occurred as described under Scenario 3, the Eureka County School District would most likely be required to hire additional instructional staff and may also see higher levels of other instructional costs, administrative costs, and transportation costs, when compared to the Base Case scenario.

The ratio of 16 percent of incremental school enrollment to relocating population derived by the commenter from Table 3.17-23 is based on the total population associated with the Mount Hope project. Total population includes weekly commuters who are assumed to travel to the Eureka area each week in single status and return to their homes outside of the Eureka area during their days off. These workers are assumed to be in the area without households or school age children. For the period covered in the table, weekly commuters are assumed to be 40 percent of the workforce. When considering only resident population (i.e., total population less weekly commuters), the analysis assumed the proportion of school age children to be 21 percent. This distinction has been clarified in the document (Appendix E). It should be noted that the current (2010) ratio of public school enrollments to resident population for Nevada counties ranges from 8.4 percent to 20.4 percent, while the state-wide ratio is 16.2 percent (Nevada Department of Education [2010]). Based on these state-wide county-level figures, the BLM's assumption of 21 percent is actually quite conservative with respect to typical ratios. Review of historical population and Eureka County enrollment data shows that this ratio has not exceeded 21 percent in the last 11 years. The BLM believes the analysis is based on the best available information. Enrollment trends in comparison to population during the full period of time the Ruby Hill Mine suspended operations and after operations resumed are also illustrative of this point. The year to year trends vary substantially and demonstrate the potential danger in using observed behavior in one year to predict future impacts.

Comments

Letter 803 Comment 306, Letter 803 Comment 334, Letter 803 Comment 335

CC-004-Baseline Data Adequacy

Commenters express concern about the adequacy and extent of the data used in determining the baseline water resources conditions. Commenters identified a number of items. These include climate and precipitation data, historic yield data, and changes in water flow as examples.

Response

The EIS uses the best available baseline data for water resources. To provide more information on baseline data adequacy, the following text has been added to the EIS in Section 3.2.2.1, "Baseline data collection, including surface water monitoring, was initiated in 2005 and continues through the present. The geographic area of monitoring was significantly expanded in 2007 and 2008 beyond the original "five-mile radius" geographic area surveyed between 2005 and 2007. This includes spring and stream sites throughout the Roberts Mountains, spring and stream sites in Pine Valley, and flowing wells and springs on the floor of Kobeh Valley (JBR 2011). The period of baseline monitoring covers a range of seasonal and climatic conditions, including above and below average precipitation years. Specifically, calendar years 2006 and 2008 were below average precipitation, years 2005, 2007, and 2010 were above average, and years 2009 and 2011 were near average, based on precipitation records at Eureka (Eureka COOP weather station). The fluctuations in stream and spring flows observed due to seasonal and longer term climatic variability are described in JBR (2011) and Montgomery et al (2010)."

Additionally, reference to JBR (2011) has been added to the second paragraph in Section 3.2.2.1 of the EIS.

Comments

Letter 855 Comment 26, Letter 855 Comment 27, Letter 855 Comment 28, Letter 855 Comment 30, Letter 855 Comment 34, Letter 855 Comment 35, Letter 855 Comment 46, Letter 859 Comment 56, Letter 859 Comment 59, Letter 859 Comment 60, Letter 859 Comment 61, Letter 859 Comment 75, Letter 859 Comment 94

CC-005-Socioeconomics Cumulative Impacts

Commenter expressed concern about the scope of the cumulative analysis for socioeconomics. There are a number of projects that are located outside the CESA boundary that would add to the population of southern Eureka County.

Response

The text in the twelfth paragraph under Section 4.2 of the EIS has been revised to read, "The CESA for socioeconomics and environmental justice was determined to include those projects and activities that have a potential effect on socioeconomics or environmental justice that occur within the socioeconomic and environmental justice study area (Figure 3.17.1)." Table 4.2-1 has been revised to incorporate the above text in to the "Cumulative Effects Study Area" column for Socioeconomics and for environmental justice. In addition, the "Size of Area" and "Figure Number Reference" columns have been labeled "n/a" for socioeconomics and environmental justice. The Socioeconomics CESA boundary has been removed from Figure 4.2.2.

Comments

Letter 803 Comment 433

CC-006-Local Hydrologic Model

Commenters express concerns about adequacy of the Local (Pit Area) Hydrological Model. The commenters state that the potential impacts to ground water quality are not sufficiently addressed. In addition, the potential effects from the ore processing operations are not addressed.

Response

Modeling has demonstrated that the pit lake would act as a hydraulic sink and provide containment of any post-mining pit lake waters (see Section 3.2.3.3 of the EIS). Pit lake levels would remain below surrounding ground water levels and the pit lake would remain a hydraulic sink. Additionally, the proposed Project includes design features to control generation of leachate from tailings and waste rock and to contain any solutions that are generated.

Comments

Letter 390 Comment 6, Letter 392 Comment 6, Letter 407 Comment 4, Letter 809 Comment 4, Letter 835 Comment 4, Letter 859 Comment 32, Letter 859 Comment 34

CC-007-Regional Hydrological Model

Commenters express concern about the adequacy of the Regional Hydrological Model. The EIS should address all long-term impacts to water sources and all indirect impacts related to the loss of water sources. The EIS cannot exclude analysis of impacts caused by use of underground water.

Response

The EIS provides a thorough analysis and disclosure of potential impacts based on the best available data and a hydrologic model that provides a valid and reasonably accurate projection of drawdown. Data included in the analysis support the conclusion that ground water flow between Kobeh Valley and Diamond Valley is not large due to low conductivity of rocks that comprise the Whistler Range. Thus, impacts to Diamond Valley water rights and the effect on availability of ground water for agricultural uses would likely be insignificant. The EIS does, however, include a complete and thorough description and analysis of potential impacts in Section 3.2.3.

Allocation of water resources to the Project is administered by the State Engineer as authorized under Nevada water law. Ground water appropriations for the Project are granted within the defined perennial groundwater yield (sustainable yield) for Kobeh Valley and, to a lesser extent, Diamond Valley.

Pumping and use of ground water would capture some otherwise naturally occurring discharges of ground water. The Project would capture ground water used by phreatophyte plants on the Kobeh Valley floor, predominantly greasewood shrubs, as summarized in the Impacts to Basin Water Budgets subsection under section 3.2.3.3.2. Other associated direct and indirect impacts, or potential impacts, related to Project pumping and lowering of the water table have been predicted using a peer-review numerical flow model, the results of which are disclosed in the EIS, and include impacts to wells, land surface subsidence, effects to interbasin flow including subsurface flow to Diamond Valley, and potential impacts to streams and springs connected to the water table. These impacts, including the geographic extent, degree, and timing, are discussed in detail in Section 3.2.3.3.2 of the EIS.

Comments

Letter 369 Comment 1, Letter 385 Comment 6, Letter 805 Comment 11, Letter 805 Comment 16, Letter 823 Comment 2, Letter 855 Comment 56, Letter 859 Comment 66, Letter 859 Comment 67, Letter 859 Comment 68, Letter 859 Comment 95, Letter 864 Comment 3, Letter 928 Comment 1

CC-008-EML Mitigation Comments

Commenters express concern regarding the scope of the water quantity mitigation. The use of cessation of flows in the springs and streams was not considered appropriate. Clarification on the source of water for mitigation was requested.

Response

The water quantity impacts have been revised to in response to numerous comments on the mitigation section of the EIS.

Comments

Letter 813 Comment 5, Letter 813 Comment 6, Letter 813 Comment 7, Letter 813 Comment 9, Letter 813 Comment 10, Letter 813 Comment 12

CC-009-Water Rights

Commenters express concerns about affects to water rights, including those in Diamond Valley. In addition, concern was also expressed about the Pete Hansen Decree, PWR 107s, and other individual water rights. Commenters also expressed concern about the current impacts to ground water and ground water availability in Diamond Valley.

Response

Pumping from the Project is not predicted by ground water modeling to cause any detectible lowering of the water table in the Diamond Valley agricultural area. The Project is neutral to Diamond Valley water supplies, as any consumptive use of Diamond Valley water would necessarily be permitted by acquisition and transfer of previously granted water rights. EML has no responsibility to mitigate historic overdraft of groundwater by agriculture pumping in the basin. It is acknowledged in the EIS that the State Engineer would restrict groundwater use as necessary to comply with Nevada water law and would be responsible for administering water rights for the basin.

Given the uncertainties regarding the hydrologic characteristics of the area and the degree to which the springs and streams will or will not be affected by the ground water removal, it is reasonable for the agency (BLM) to require monitoring and implementation of mitigation measures only after impacts to surface waters are realized. In addition, any degradation does not constitute "unnecessary or undue" degradation. BLM is to prevent, not only unnecessary degradation, but also degradation that while necessary to mining, is undue or excessive.

EML has acquired and gained approval from the State Engineer for permanent transfer of ground water rights in Diamond Valley to the pit portion of the Project, in the amount of 385 acre-feet per year. The duty of the transferred rights was adjusted down for crop consumptive use (State Engineer Ruling 6127 dated July 15, 2011). Thus, the Project would not result in additional water consumption beyond what was previously appropriated. There is no detrimental impact to the available ground water in Diamond Valley because the State Engineer reduced the duty of the rights being transferred to the pit to be equal only to the crop consumptive use portion of the irrigation rights.

The State Engineer may require a quantity of water rights to remain at the pit post-mining (in perpetuity) to cover future pit lake evaporative losses. The State of Nevada has deemed post-mining pit lake filling and evaporative losses as part of the overall beneficial use derived from the mining project and not a waste of water. This determination is consistent with numerous open pit mining projects throughout Nevada.

Public Water Reserves (PWR 107) are acknowledged in the State of Nevada by issuance of a Reserved water right permit by the State Engineer. The BLM has filed applications for Reserved water rights for stockwater and wildlife use in Kobeh Valley and the adjacent basins, with subsequent Reserved permits being granted by the State Engineer. These are acknowledged and disclosed in the EIS within the modeled area of Project drawdown, including the rates and annual duties granted. Domestic water uses of underground water in Nevada are permissible without obtaining a water right permit, up to the statutory maximum of 1,800 gallons per day (equal to two acre-feet per year). Domestic uses of greater amounts require a water right permit. All domestic wells (without permits) and all permits granted for domestic water use within the area of projected Project drawdown of the water table have been identified and disclosed in the EIS.

Decreed water rights of Henderson Creek, and other streams and spring sources in the Pete Hanson Decree, were subject to review by the State Engineer and are addressed in Ruling 6127, which was recently upheld by judicial review. For the analysis of impacts, the EIS conservatively assumes that the regional groundwater aquifer is connected with surface water flows. However, Nevada water law allows for a reasonable of groundwater, and no impact to decreed surface water rights of Henderson Creek are expected. However, for assurance, monitoring requirements are in place in the State Engineer's Monitoring, Management, and Mitigation Plan (3M Plan) for the Project.

Other spring and stream sources, regardless of whether an active water right has been filed, that could potentially be claimed for use as a vested right are also considered and disclosed in the DEIS. All mapped springs and perennial streams within the predicted area of water table drawdown are identified, whether or not the source has a permit.

Once the ore body has been mined and water rights use cease, Nevada State water laws remain applicable, including possible transfer of water right to other locations and uses within the basin, or forfeiture of water rights if non-use occurs for more than five years.

Transfer or changes in use of EML's water rights after mining would require filing of applications and review by the State Engineer's office in accordance with regulatory requirements on processing, including public review.

The State Engineer ruling has considered all water rights types, including those for impoundments of surface waters, within the potential area of influence of the mining Project. No impact is predicted to impoundments or impoundment water sources. However, monitoring would be required as described in the 3M Plan, including monitoring for potential impacts to stream and spring resources.

The Nevada State Engineer would retain responsibility for administration of water rights, including review of data to determine whether the Project would result in impacts and whether mitigation would be required.

Comments

Letter 179 Comment 3, Letter 384 Comment 7, Letter 803 Comment 147, Letter 805 Comment 13, Letter 805 Comment 15, Letter 813 Comment 2, Letter 836 Comment 1, Letter 855 Comment 18, Letter 855 Comment 22, Letter 855 Comment 23, Letter 855 Comment 24, Letter 855 Comment 25, Letter 855 Comment 31, Letter 855 Comment 51, Letter 858 Comment 37, Letter 858 Comment 38, Letter 858 Comment 54, Letter 858 Comment 55, Letter 859 Comment 26, Letter 859 Comment 57, Letter 859 Comment 58, Letter 859 Comment 73, Letter 859 Comment 97, Letter 859 Comment 99, Letter 859 Comment 103, Letter 859 Comment 131, Letter 859 Comment 132, Letter 908 Comment 3

CC-010-EML Water Rights

Commenters express concern about the exclusion of EML owned water rights from effects analysis. This discredits the analysis in the EIS.

Response

The EIS makes it clear the applications to transfer underground water rights purchased by EML and applications to change the manner of use must be approved prior to the start of the Project, as required by Nevada water law, which the Nevada State Engineer has done and the District Court has confirmed. All of these ground water applications are represented and included in the EIS analysis as part of the Proposed Action pumping for the Project, include water required for mitigation, which is a combined total of 11,300 acre-feet per year. It is obvious that, as the Project applicant, EML recognizes that other existing water rights which it owns may be affected. Regardless of those potential effects, EML has decided to propose the Project. The intent of the EIS is to analyze and disclose effects to environmental resources, not to provide an analysis that might better inform the applicant's decision. Disclosure of potential impacts to the applicant's existing rights and holdings is not necessary to inform the BLM's decision.

Comments

Letter 802 Comment 2, Letter 859 Comment 64, Letter 859 Comment 65

CC-011-Monitoring and Mitigation

Commenters express concern regarding the effectiveness of the proposed monitoring and mitigation for potential impacts to water resources. These concerns include the determination of appropriate triggers to implement mitigation, the scope of the proposed mitigation for the springs and streams, and how individuals will be compensated. In addition, the source of water for mitigation is also questioned.

Response

The BLM believes the water resource monitoring proposed for the Project is adequate to provide the necessary information to allow the BLM to fully evaluate the potential effects of the Project on water resources and to determine if mitigation is necessary. Monitoring sites are based on the modeled predictions of drawdown but also extend beyond the projected extent of the ten-foot drawdown contour. Monitoring includes both ground water levels and surface water flows. The frequency of the proposed monitoring is adequate to detect Project-induced effects, especially when considering the extensive baseline data that have been collected.

Evaluation of the monitoring data would allow the BLM to determine when mitigation is necessary; however, some ground water levels and surface water flows would be affected by other anthropogenic stresses and natural factors so that it is not possible to define appropriate "bright line" triggers for mitigation. Mitigation identified in the EIS includes specific mitigation for individual surface water sources. The BLM would ensure that the mitigation restored the pre-Project function and value of water-related resources that could be impacted. Nevada water law recognizes that water rights include a duty and diversion rate, and mitigation required by the State Engineer for any Project-related impacts would be based on providing those amounts of water.

As stated in the EIS, EML would be responsible for implementing mitigation as directed by the BLM. Additionally, the EIS recognizes that the State Engineer would have jurisdiction and authority to require mitigation for impacts to water rights. The State Engineer has accepted a Monitoring, Management, and Mitigation (3M) Plan that includes funding for water right mitigation. The BLM has the authority to require funding for mitigation of impacts to water resources not covered by water rights should monitoring data indicate the necessity for providing this financial assurance.

Table 3.2-9 and Table 3.2-18 have been revised in the FEIS to indicate that a reduction of flow caused by the Project would be the threshold for the BLM to consider implementation of mitigation.

The EIS uses appropriate criteria for impact significance determination. Impairment of designated uses would constitute a significant impact, whereas mere changes in chemistry that do not impair designated beneficial uses would not be significant.

Comments

Letter 803 Comment 119, Letter 803 Comment 121, Letter 803 Comment 123, Letter 805 Comment 20, Letter 823 Comment 6, Letter 855 Comment 7, Letter 855 Comment 15, Letter 855 Comment 16, Letter 855 Comment 38, Letter 855 Comment 39, Letter 855 Comment 43, Letter 855 Comment 44, Letter 855 Comment 48, Letter 855 Comment 50, Letter 855 Comment 59, Letter 855 Comment 94, Letter 855 Comment 95, Letter 855 Comment 125, Letter 855 Comment 126, Letter 855 Comment 163, Letter 859 Comment 9, Letter 859 Comment 10, Letter 859 Comment 18, Letter 859 Comment 19, Letter 859 Comment 31, Letter 859 Comment 33, Letter 859 Comment 39, Letter 859 Comment 51, Letter 859 Comment 53, Letter 859 Comment 54, Letter 859 Comment 62, Letter 859 Comment 77, Letter 859 Comment 80, Letter 859 Comment 81, Letter 859 Comment 85, Letter 859 Comment 125, Letter 859 Comment 126, Letter 906 Comment 2, Letter 941 Comment 28

CC-012-Recovery of Ground Water Levels

Commenters express concern about post-Project recovery of ground water levels, when would water levels begin to recover, and also will the water levels recover.

Response

The following text has been added to Section 3.2.3.3.2. of the EIS to provide additional description of groundwater level recovery in the Kobeh Valley wellfield area: "Water level recovery in the Kobeh Valley wellfield area would begin immediately upon cessation of Project pumping. Recovery would be quickest in the vertical dimension in the area nearest the production wells. The cone of depression created by ground water pumping would expand laterally for a number of years after cessation of pumping, ranging between two to 30 years depending on geographic location. Once the cone of depression reached the maximum lateral extent, it would begin to contract laterally and would continue to fill vertically. Recovery of water levels in the wellfield area would reach within ten feet of pre-Project conditions by 100 years post mining (Table 3.2-10).

Comments

Letter 855 Comment 36, Letter 855 Comment 37, Letter 859 Comment 74

CC-013- Impacts to Wildlife from Draindown Solution

Commenter expressed concern about impacts to wildlife from draindown of the ET basins. Specific concern regarding direct impacts to wildlife are raised, as well as indirect impacts to wildlife from water quality and vegetation.

Response

When considering realistic exposures, ecological threats from draindown solutions are minimal. Fencing would effectively exclude all larger terrestrial wildlife species. ET cell backfill would eliminate the potential for open solution. A long-term funding mechanism would be placed to remove ET cell media with high concentrations of salts, (and to maintain fencing). Given the design consideration, a risk assessment is not warranted. No changes to the text of the EIS have been made in response to this comment.

Comments

Letter 941 Comment 49, Letter 941 Comment 51

CC-014-Modeled Ground Water Users

Commenter expressed concern regarding the number of ground water pumping sources used in the ground water flow model. Also the ground water flow model assumption of a substantial decrease in Diamond Valley ground water pumping in Year 2105 is not accurate.

Response

The BLM believes that the modeling is sufficiently accurate and that pumping sources have been adequately accounted for. Even if there are "hundreds" of domestic wells in the area, they are limited to two acre-feet per year, which would not make a meaningful difference in the model results. Likewise, for the future pumping assumption, while some smaller sources of pumping are not explicitly represented in the model, the assumption of sustained agricultural pumping at current magnitudes through year 2105 cumulatively represents a near "worst case" total pumping magnitude from the Diamond Valley basin from all sources. This assumption was adopted, given the lack of a specific water management plan for the basin to map out an overdraft curtailment plan. Also, all simulated pumping in Diamond Valley is subtracted out when analyzing effects of the Proposed Action. Lastly, in regards to the Wise Family Development "water rights," these are pending applications before the State Engineer and have not yet been granted. The model assumption for future pumping includes granting of water rights to Kobeh Ranch LLC (senior most pending applications to

appropriated groundwater in Kobeh Valley) up to the perennial yield of the basin, as defined at 16,000 AF/yr. It would not be appropriate to assume that the State Engineer would grant additional water rights in the basin in excess of the perennial yield, therefore, the junior pending applications are not included in the cumulative action model scenario.

At the time of model preparation, the input assumptions were based on the best available data including projections of Ruby Hill pumping. The extension of pumping from that source beyond what was assumed in the model is minor in relation to total pumping stresses and will not substantially affect the model results. Furthermore, the pumping from Diamond Valley is "subtracted" from the Cumulative Action model runs to determine impacts from the Proposed Action.

The comment correctly states that it is impossible to predict the rates at which pumping rates will decrease. There are too many variables and possible outcomes to make an accurate prediction. The assumption used in the model is sufficiently accurate to allow the model to provide reliable information to predict impacts and answer the questions posed by the impact analysis. The assumption regarding agricultural pumping is conservative, in that it represents continued pumping at current rates for an additional 50 years, well beyond what appears to be likely, given the current rate of drawdown. This is a valid and reasonable assumption, given the lack of a definitive water management plan to address the overdraft situation. In addition, Diamond Valley pumping is "subtracted" from the Cumulative Model run to determine impacts from the Proposed Action.

The incremental increase in municipal or mining pumping, whether temporary or permanent, is generally obscured by the magnitude of agricultural pumping projected into the future. Furthermore, given the current state of overdraft in the basin, it is likely that any additional mine pumping, or pumping for other uses, would have to be derived from the existing pool of agricultural water rights that have been granted.

Comments

Letter 803 Comment 103, Letter 803 Comment 104, Letter 803 Comment 106, Letter 803 Comment 107

CC-015-WRDF Cover Design

Commenters expressed concern about the WRDF cover design. The cover may not work as designed. One commenter expressed a request for a different cover design.

Response

A store-and-release cover would be constructed over the PAG WRDF to limit infiltration in to the dump after closure. A cover design and infiltration model was completed by MWH Americas, Inc. (MWH) to assess closure requirements for infiltration control and protection of water resources. Water balance simulations and predictive infiltration modeling were used to evaluate the long term flux of water through the cover at various thicknesses. The model-predicted water flux through the 24-inch alluvial cover indicates the available storage capacity of the cover is sufficient to significantly reduce infiltration reporting to the WRDF. Based on these results and experience with other waste rock dumps throughout Nevada with similar site conditions, seepage from the toe of the PAG WRDF is not anticipated for average or dry climatic conditions. Furthermore, the PAG WRDF is designed with a low-permeable base layer and drainage system in order to minimize the potential for downward migration of any infiltration into the subsurface. Therefore, the proposed WRDF design provides adequate source control and a geomembrane cover is not warranted. During operations, the effectiveness of a 24-inch cover for the actual site conditions would be confirmed and the proposed closure design would be modified if required.

The proposed waste rock management, PAG facility design and closure approach sufficiently address the potential for long-term water quality issues associated with the PAG waste rock.

No changes to the text of the EIS have been made to address this comment.

Comments

Letter 805 Comment 8, Letter 941 Comment 22, Letter 941 Comment 41

CC-016-Emergency Personnel

Commenter expressed concern about the availability of emergency personnel to respond to an increase in emergency situations associated with the Project. In addition, there was concern expressed about the cost to Eureka County to add additional personnel, as well as the timeframes associated with hiring qualified personnel.

Response

The following text has been added to Section 2.1.10 of the EIS. "EML or its contractor would have emergency medical personnel on site during construction. EML would have emergency medical personnel on-site during operations and would maintain a licensed ambulance with licensed driver for transportation in the event of an incident that required this level of attended emergency

transportation. However, should a medical emergency occur, it is recognized that, depending on the specifics, Eureka County emergency medical services may be contacted for assistance with medical response or transportation."

Comments

Letter 803 Comment 329, Letter 803 Comment 330

CC-017-Model Uncertainty

Commenter expressed concern about the uncertainty in the pit lake water quality model .The model outputs were not consistent with other models for pit lakes in Nevada and therefore should be redone. The commenter identified a number of model results and stated that these results were of concern. In addition, there was a lack of comparison to existing pit lakes associated with gold mines in Nevada.

Response

All models contain a level of uncertainty. Uncertainty in the Mount Hope pit lake modeling has been constrained through extensive and conservative sensitivity analyses of various components related to pit wall rock and groundwater chemistry, including (but not limited to):

♣ Geochemical data from humidity cell tests (HCTs) used to represent pit wall rock runoff/submergence chemistry. Early-time, late-time, and average data from the HCTs were applied to the model to evaluate sensitivity to these data.

♣ Scaling of the geochemical data from laboratory to field concentrations. The Mount Hope modeling measured the grain sizes of material in the HCTs and compared them to field conditions to develop a relatively conservative scaling factor (compared to typical pit lake models at other sites). To evaluate uncertainty in scaling, the "unscaled" laboratory data were also applied in the model for a conservative assessment.

♣ Number of "pore volumes" that rinse from the pit wall rock during submergence. The Mt Hope modeling evaluated rinsing of up to 20 pore volumes of solute from the pit walls. This is a very conservative estimate of rinsing that is not typical to pit lake models at other sites.

♣ Groundwater quality data to represent post-closure inflowing groundwater. Groundwater quality data from four wells were applied to the model in proportion to inflow rate; the most conservative sensitivity analysis used the lowest quality (highest total dissolved solids) groundwater for all inflowing water.

No changes to the text of the EIS have been made to address this comment.

Comments

Letter 858 Comment 17, Letter 858 Comment 18, Letter 858 Comment 22

CC-018-Pit Lake Model Assumption

Commenter express concern about the pit lake model assumptions A number of revised scenarios were presented. Also the BLM needs to require the evaluation of the following questions. What happens when water is removed from an aquifer regarding the volume that it used to fill? Assuming it is air, how much sulfate will be produced if a realistic assumption is made that over 44 years, all of the oxygen in that air is consumed by pyrite oxidation? What will happen to those soluble products as the cone of depression and water enters the pit lake?

Response

A main issue the commenter raises is with regard to the water quality of the groundwater entering the pit following closure. The commenter contends that during dewatering, atmospheric air would be drawn into the aquifer via advective transport (as opposed to diffusion), and this influx of highly oxygenated air would be available to oxidize sulfides and produce secondary sulfate minerals in the aquifer. In concept, these secondary minerals would be flushed back into the pit as the water table rebounds, introducing sulfate, acidity and metals into the pit lake. There are no literature citations to support this conceptual model. As described in the conceptual model developed for Mt Hope, the vadose zone materials in the cone of depression around the Mt. Hope pit would not be expected to generate significant amounts of sulfate, metals, or acid for the following reasons:

♣ Geochemical data indicate a relatively inert ore body with low sulfur and carbonate content; only 16 percent of the ultimate pit wall is predicted to be potentially acid generating, with the remaining 84 percent classified as non-acid generating rock. The surrounding aquifer material would contain similar, or lower, levels of reactive sulfides.

♣ The fracture-controlled nature of flow (air or water) in the aquifer results in very low porosity and very limited surface area for potential reaction with air.

♣ Air entering the vadose zone as the pit is slowly being dewatered would be stripped of oxygen as it encounters reactive material; predominantly in the pit wall materials.

♣ If any oxygen succeeded in entering the deeper fractures, oxygen would still need to reach the pyrite grains to react. Any pyrite grains exposed in fracture pathways, which are not already oxidized, would have residual soil water around them. Residual moisture content of the vadose zone would limit oxidation due to very low rates of oxygen diffusion through water.

♣ In the highly unlikely event that even a small amount of oxygen reached the deeper fractures, , HCT data (which are conservative estimates of reactivity due to higher porosity, greater reactive surface area, aggressive wet/dry weathering cycles, etc.) indicate relatively low sulfate and negligible acid generation.

♣Pyrite oxidation rates are orders of magnitude lower at circumneutral pH (compared to pH less than 4) because of inhibited bacterial activity at higher pH. Geochemical test data and site water quality data indicate near-neutral pH conditions in the aquifer and therefore very slow rates of associated pyrite oxidation.

♣ Ritchie (Ritchie, A.I.M., 1994. Sulfide Oxidation Mechanisms: Controls and Rates of Oxygen Transport, in, Short course Handbook on Environmental Geochemistry of Sulfide Mine-Wastes, a Mineralogical Association of Canada publication edited by J.L. Jambor and D.W. Blowes, 1994) has a clear demonstration of the potential effects of pyrite oxidation caused by a single pore volume of air in sulfide rich waste rock (high pyrite content, reactive, high porosity, fully penetrated by air). The amount of oxygen present in the first pore volume was about 1000 times too low to oxidize all the pyrite, indicating an additional source of oxygen would be required (i.e., very slow, diffusion controlled migration of O2). Considering the test case by Ritchie is highly conservative on all counts compared to in-situ host rock at Mt Hope, and still was insignificant pyrite oxidation, it follows that in the case of Mount Hope host rock (i.e., lower porosity, lower sulfide, less reactive, higher moisture content, less oxygen availability, no indication of reactivity in HCTs) there would be no significant mass loading of sulfate, metals, or acidity to the pit lake. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 858 Comment 15, Letter 858 Comment 19

CC-019-Roads and Traffic

Commenters expressed concern regarding the roads used in the traffic assessment. Would the roads in Kobeh Valley be used to access the Project? Also would the taxes paid by EML be sufficient to construct passing lanes and school bus turnouts on SR 278?

Response

EML has revised the Plan of Operations to clarify that the only Project access would be from S.R. 278 and that there would be no direct Project access from the west via Roberts Creek Road. The text in 2.1.9 has been revised to read "A primary access road about 32 feet wide (24 feet running surface width plus four foot wide shoulders) would be constructed to connect the proposed Project Area with S.R. 278. Following project construction, EML may pave this primary access road.

To enhance safety, turn and acceleration lanes would be constructed on S.R. 278 at the Project entrance. A deceleration/right turn lane would be constructed for southbound traffic beginning north of the Project turnoff and would be extended south of the turnoff to provide an acceleration lane for the southbound traffic. A deceleration/left turn lane would be constructed for northbound traffic beginning south of the Project turnoff, and an acceleration lane would be constructed beginning at the project turnoff and extending north.

To remove mud and dirt from highway vehicles, an oversized cattle guard system would be installed on the main access road. EML would install a vehicle wash to reduce the amount of mud and dirt that would be tracked onto S.R. 278 if, in cooperation with Eureka County, area residents and NDOT, it is determined to be necessary.

A secondary Project access road would be constructed to the north of the primary access road, principally for the delivery of equipment and materials. Access into the project would be limited to the single entry point at the main gate where the access road from S.R. 278 would reach the Project perimeter fence. No public access to the Project from the Kobeh Valley side would be provided. However, inside the Project boundaries, EML personnel and authorized contractors would be allowed to enter Kobeh Valley from the west side of the project through secured gate(s) to conduct Project-related activities in the well field and other areas as needed, and to re-enter the Project through the secured gate(s)."

No Project related traffic has been identified as potentially using County Road 101.

Comments

Letter 803 Comment 387, Letter 803 Comment 416, Letter 805 Comment 42

CC-020-Impacts to Phreatophytes

Commenters expressed concern about the type and duration of impacts to phreatophytes as a result of predicted ground water drawdown. Potential impacts to soils and air quality from changes or loss of phreatophytes are also identified. Commenters also identified potential impacts to riparian areas, special status species, as well as livestock forage as a result of predicted ground water drawdown. Commenters also request mitigation for these impacts to phreatophytes.

Response

The impact analysis for phreatophytes (located after the Significance of the Impact for Impact 3.9.3.3-1) has been revised in Section 3.9.3.3.1 of the FEIS to read as follows, "Phreatophytes that may be impacted as a result of the Proposed Action aquifer drawdown occur in Kobeh Valley. In the central Kobeh Valley, as discussed in Section 3.2 the shallow ground water (between zero and ten feet below ground surface) at the valley floor supports substantial areas of phreatophyte vegetation (Figure 3.9.2). Current conditions include the presence of the following species in the phreatophyte vegetation community: greasewood; rabbitbrush; and saltgrass. ET of ground water by phreatophytes is the primary ground water discharge in the basin. As illustrated on Figure 3.2.9, approximately 4,122 acres of phreatophyte vegetation were mapped as occurring within the area predicted to be impacted by aquifer drawdown. More recent data from satellite imagery indicate that as many 28,500 acres of phreatophytes are located in Kobeh Valley; however, these data are not yet finalized (USGS 2011). In order to verify the extent of phreatophytes potentially impacted by the Project, the soil associations in Kobeh Valley were reviewed to determine which soils are associated with phreatophytes. This review identified Bubus loam (1010), Bubus-Dianev (1012), Ocala silt loam (161), Dianev silt loam (250), Brinnum silt loam (400), and Beanflat silt loam (410). The extent of these soils in Kobeh Valley is similar to the extent of phreatophytes identified in the preliminary results from the USGS Open-File Report 2011-1089 (USGS 2011), and are distributed southwest of the Project Area and overlap modeled ground water drawdown contours up to 70 feet in depth. However, the majority of phreatophytes that would be impacted are located in the area predicted to experience a ten- to 20-foot drawdown. The resultant depth to ground water would be between ten feet (if the baseline ground water level was at the surface) and up to 30 feet (if the baseline ground water level was ten feet below the surface). On average, the majority of the phreatophytes are predicted to experience an increase in depth to ground water of 20 feet as a result of the Proposed Action. However, based on the more recent phreatophyte location data some of the phreatophytes would be located where the depth to ground water is predicted to increase as many as 70 feet as a result of the Proposed Action.

Where the phreatophytes would be impacted as a result of ground water drawdown, the increase in the depth to ground water is expected to result in impacts to the phreatophyte vegetation through a change in vegetation composition and cover. Lowering of the water table resulting from ground water drawdown is a change in resource availability for the vegetation with an associated increase in ecological stress. Species adapted to conditions of higher available water will be replaced over time by species adapted to conditions of lower available water. Change in the depth to ground water is not the only factor that affects the composition of phreatophyte communities. Other factors that affect changes in phreatophyte communities include the following: amount of annual precipitation; climate change; livestock grazing; and fire regime (KS2 Ecological Field Services 2011).

In the areas where the phreatophytes would experience an increased depth to water of 20 feet (which is what the majority of phreatophytes would be experience), the xeric phreatophytes (rabbitbrush and greasewood) are expected to respond by increasing their root depth as the depth to ground water increases and utilize more surface water when it is available (Naumberg et al. 2005). While the percent cover of greasewood and saltgrass may decrease, the percent cover of rabbitbrush would increase (KS2 Ecological Field Services 2011, Stringham 2011). In areas where the phreatophytes would experience an increase depth to water of 50 feet, the vegetation community would likely shift from greasewood and rabbitbrush to mainly rabbitbrush, and then as the depth to ground water increases more would likely shift to a community dominated by Wyoming big sagebrush (populations of Wyoming big sagebrush are located adjacent to the xeric phreatophytes in Kobeh Valley). A water table decline could result in perennially drier soils. The deeper water table would preclude salt accumulation at the soil surface, allowing precipitation to leach salts to deeper soil depths, resulting in drier, less saline soils, and creating conditions where xeric phreatophytes can survive (Cooper et al. 2005). Additionally, recovery of the water table following Project-related ground water pumping could result in a transition back to a pre-Project vegetation community state (Stringham 2011).

Impacts to other vegetation communities as a result of drawdown are not expected. The predicted ten-foot water drawdown contour for the Proposed Action does not intercept any known phreatophyte vegetation within Diamond Valley, Antelope Valley, or Pine Valley.

■ Impact 3.9.3.3-2: Phreatophyte vegetation would potentially experience a change in species composition and percent cover due to the predicted water table drawdown associated with ground water pumping and subsequent recovery of the water table. Lowering of the water table in the area of phreatophytes is not expected to result in a loss of vegetation in these communities.

Significance of the Impact: The impact is not considered potentially significant. Based on the results of the analysis, no mitigation for this impact is proposed."

As a result of the revised analysis for the impacts in Section 3.9.3, there are no quantifiable impacts to air quality expected as a result of wind-blown fugitive dust from the loss of phreatophytes from the Project.

The text describing phreatophytes in Section 3.2.2.6.5 has been revised in the FEIS to add the following text, "Some phreatophytes, such as greasewood (Sarcobatus spp.), commonly send their roots as deep as 50 feet to the water table, although depths of up to 80 feet were reported by Eakin et al. (1951). Rabbitbrush (Chrysothamnus and Ericameria spp.) is also considered a phreatophyte, although it has a dimorphic root structure with fine roots in the upper soil profile and woody tap roots that extend to near the water

table at greater than 13-foot depths, however, depths of up to 48 feet have been reported (KS2 Ecological Field Services 2011). The existing phreatophyte areas in the HSA are mainly found along the axial drainages of Antelope, Kobeh, and Pine valleys and surrounding the playa area in the northern part of Diamond Valley."

The text in Sections 3.2.3.5.2, 3.2.3.7.2 has been revised in the FEIS to read as follows, "The predicted water table drawdown in Kobeh Valley extends to the mapped phreatophyte areas northwest of Bean Flat and east of Lone Mountain (Figure 3.2.26). The predominant phreatophyte vegetation in these areas is greasewood. The simulated extinction depth for greasewood is 40 feet below the ground surface, and the ground water model results indicate that the magnitude of drawdown along the perimeter of these phreatophyte vegetation areas would exceed the extinction depth for some period of time (Montgomery et al. 2010). This could potentially lead to a change in composition and percent cover of phreatophyte plants and an associated decrease in evapotranspiration of ground water, as reflected in the estimated water budget changes listed in Tables 3.2-15 and 3.2-16."

The text for Impacts 3.2.3.5-4, 3.2.3.6-4, and 3.2.3.7-4 has been revised in the FEIS to read as follows, "Ground water flow modeling indicates that there could be up to an approximately 25 percent decrease in evapotranspiration of ground water in Kobeh Valley due to a change in phreatophyte composition and percent cover resulting from temporary mine-induced drawdown."

The text in Sections 3.9.3.3.3, 3.9.3.5.3, and 3.9.3.7.3 has been revised in the FEIS to read as follows, "Residual adverse impacts to vegetation would include the permanent loss of vegetative productivity from approximately 734 acres of land associated with the open pit that would not be reclaimed and a long-term change in vegetation composition (i.e., tree and shrub dominated communities to grass and forb dominated communities, potential change in phreatophyte vegetation percent cover and composition) as a result of Project development and operation."

The text for Impacts 3.9.3.5-2, 3.9.3.6-2, and 3.9.3.7-2 has been revised similar to Impact 3.9.3.3-2 in the FEIS.

The impact analysis for phreatophytes (located after the Significance of the Impact for Impact 3.11.3.3-1) has been revised in Section 3.11.3.3.1 in the FEIS to read as follows, "The mine dewatering system and pumping of the production well field is expected to drawdown the ground water table in an area surrounding the open pit. As discussed in Section 3.2, modeling results show that significant water table drawdowns in the aquifer would occur in an area measuring approximately 232 square miles around the Project Area including the northeast quadrant of Kobeh Valley and the southernmost fringe of the Roberts Mountains.

Phreatophytes that may be impacted as a result of the Proposed Action aquifer drawdown occur in Kobeh Valley. In the central Kobeh Valley, as discussed in Section 3.2 the shallow ground water (between zero and ten feet below ground surface) at the valley floor supports substantial areas of phreatophyte vegetation (Figure 3.9.2). As illustrated on Figure 3.2.9, approximately 4,122 acres of phreatophyte vegetation were mapped as occurring within the area predicted to be impacted by aquifer drawdown. More recent data from satellite imagery indicate that as many 28,500 acres of phreatophytes are located in Kobeh Valley (these data will be finalized upon publication) (USGS 2011). In order to verify the extent of phreatophytes potentially impacted by the Project, the soil associations in Kobeh Valley were reviewed to determine which soils are associated with phreatophytes. This review identified Bubus loam (1010), Bubus-Dianev (1012), Ocala silt loam (161), Dianev silt loam (250), Brinnum silt loam (400), and Beanflat silt loam (410). The extent of these soils in Kobeh Valley is similar to the extent of phreatophytes identified in the preliminary results from the USGS Open-File Report 2011-1089 (USGS 2011), and are distributed southwest of the Project Area and overlap modeled ground water drawdown contours up to 70 feet in depth. However, the majority of phreatophytes that would be impacted are located in the area predicted to experience a ten- to 20-foot drawdown. Where the phreatophytes would be impacted as a result of ground water drawdown, the increase in the depth to ground water is expected to result in impacts to the phreatophyte vegetation through a change in vegetation composition and cover.

Impacts to other vegetation communities as a result of drawdown are not expected. The predicted ten-foot water drawdown contour for the Proposed Action does not intercept any known phreatophyte vegetation within Diamond Valley, Antelope Valley, or Pine Valley.

■ Impact 3.11.3.3-2: Phreatophyte vegetation would potentially experience a change in species composition and percent cover due to the predicted water table drawdown associated with ground water pumping and subsequent recovery of the water table. Lowering of the water table in the area of phreatophytes is not expected to result in a loss of vegetation in these communities.

Significance of the Impact: The impact is not considered potentially significant. Based on the results of the analysis, no mitigation for this impact is proposed."
The text for Impacts 3.11.3.5-2, 3.11.3.6-2, and 3.11.3.7-2 has been revised similar to Impact 3.11.3.3-2 in the FEIS.
The impact analysis for phreatophytes has been revised in Section 3.12.3.3 such that Impact 3.12.3.3-1 now follows, "Table 3.12-2 includes the active preference before and during the Project for the affected allotments. The loss of 781 AUMs represents 2.7 percent of the active grazing preference for the allotments in the Project Area."

The impact discussion for phreatophytes has been revised in Section 3.12.3.3 of the FEIS following Impact 3.12.3.3-1 to include a new impact and now reads, "The 14,204-acre enclosure would not impact AUMs within the 3 Bars, Santa Fe/Ferguson, or Lucky C Allotments. However, portions of these allotments could have potential impacts to AUMs due to the possible impacts to forage and habitat in the phreatophyte vegetation community related to ground water drawdown.

■ Impact 3.12.3.3-2: Phreatophyte vegetation would potentially experience a change in species composition and percent cover due to the predicted water table drawdown associated with ground water pumping and subsequent recovery of the water table. Although the lowering of the water table in the area of phreatophytes is not expected to result in a loss of vegetation in these communities, it is possible that the changes in the phreatophyte community would result in a loss of forage productivity. Impacts to other vegetation communities as a result of drawdown are not expected.

Significance of the Impact: The impact is considered potentially significant. Mitigation for this impact is discussed below.

■ Mitigation Measure 3.12.3.3-2: The BLM would monitor for changes to forage productivity as a result of ground water drawdown associated with Project-related ground water pumping. If the BLM detects a loss of forage productivity attributable to the Project, the BLM would develop and provide EML with appropriate seed mixes for those areas within and outside the Project Area impacted by water table drawdown that should be seeded. The nature of the seed mix may vary depending on the conditions encountered as a result of the drawdown. If the BLM determines reseeding to be necessary, the BLM would coordinate the conditions for reseeding (including a possible two-year grazing closure) with local permittees in order to reduce impacts to AUMs.

■ Effectiveness of Mitigation and Residual Effects: Mitigation Measure 3.12.3.3-2 would reduce potential impacts to local permittees from changes in vegetation species composition and percent cover as a result of water table drawdown during Project activities. Monitoring vegetation and possible reseeding with an appropriate seed mix, as well as BLM coordination with local permittees following reseeding, would reduce the long-term impacts to AUMs."

The remaining impacts in Section 3.12.3.3 have been renumbered in the FEIS in sequential order. Similarly edits have been made in Sections 3.12.3.5, 3.12.3.6, and 3.12.3.7 in the FEIS.

The text in the third paragraph of Section 3.13.3.3.1 in the FEIS has been revised to read as follows, "Phreatophyte vegetation would potentially experience a change in species composition and percent cover due to the predicted water table drawdown associated with ground water pumping and subsequent recovery of the water table. Lowering of the water table in the area of phreatophytes is not expected to result in a loss of vegetation in these communities. Additionally, reseeding mitigation proposed in Section 3.12.3 would improve the availability of forage for wild horses in areas identified by the BLM. Impacts to other vegetation communities as a result of drawdown are not expected. Therefore, impacts to overall wild horse forage as a result of the drawdown are not expected."

Comments

Letter 254 Comment 1, Letter 254 Comment 2, Letter 803 Comment 4, Letter 803 Comment 11, Letter 803 Comment 60, Letter 803 Comment 65, Letter 803 Comment 178, Letter 803 Comment 179, Letter 803 Comment 202, Letter 803 Comment 203, Letter 803 Comment 205, Letter 803 Comment 208, Letter 803 Comment 212, Letter 803 Comment 213, Letter 803 Comment 219, Letter 803 Comment 226, Letter 803 Comment 228, Letter 803 Comment 230, Letter 803 Comment 233, Letter 803 Comment 259, Letter 855 Comment 5, Letter 855 Comment 14, Letter 855 Comment 62, Letter 855 Comment 63, Letter 855 Comment 64, Letter 855 Comment 73, Letter 855 Comment 74, Letter 855 Comment 75, Letter 855 Comment 76, Letter 855 Comment 77, Letter 855 Comment 78, Letter 855 Comment 79, Letter 855 Comment 80, Letter 855 Comment 81, Letter 855 Comment 84, Letter 855 Comment 85, Letter 855 Comment 86, Letter 855 Comment 87, Letter 855 Comment 88, Letter 855 Comment 89, Letter 855 Comment 90, Letter 855 Comment 91, Letter 855 Comment 92, Letter 855 Comment 93, Letter 855 Comment 102, Letter 855 Comment 103, Letter 855 Comment 111, Letter 855 Comment 112, Letter 855 Comment 113, Letter 855 Comment 114, Letter 855 Comment 116, Letter 855 Comment 119, Letter 855 Comment 120, Letter 855 Comment 121, Letter 855 Comment 128, Letter 855 Comment 129, Letter 855 Comment 164, Letter 855 Comment 167, Letter 859 Comment 113, Letter 859 Comment 116, Letter 859 Comment 118, Letter 885 Comment 2, Letter 941 Comment 4, Letter 941 Comment 70, Letter 941 Comment 71

CC-021-Water Development Plan

Commenters expressed concern about EML's water development plan. The EIS does not adequately discuss Nevada Water Law. Also, does the proposed 100,300 acre-feet per year of water include all the proposed uses for the Project? Is the pit dewatering included in the proposed 11,300 acre-feet per year water use?

Response

It should be noted that the Seventh Judicial District Court for the State of Nevada ruled on June 13, 2012 to uphold the Nevada State Engineer's decision regarding the issuance of the water rights for the Project with a total combined duty of 11,300 acre-feet per year.

The FEIS has been revised to add the word "fresh" to the first sentence in Section 2.1.2. The sentence in the FEIS reads as follows, "The Project would require approximately 11,300 acre-feet per year (afy) (approximately 7,000 gallons per minute [gpm]) of fresh water supply . . ."

Also, the following text has been inserted in the FEIS after the third sentence in the first paragraph in Section 2.1.2.1, "Most of the fresh water would be ground water from the Kobeh Valley Wellfield. The fresh water requirement is 7,000 gpm. Most of the water (fresh and non-fresh) used in the project would be for processing molybdenum ore. Additional smaller amounts would be used for environmental controls (primarily for dust control and to operate the roaster's sulfur dioxide scrubber), potable, and sanitation. Fresh water would be required for some reagent solutions (associated with ore processing), environmental, potable, and sanitation. The rest of the fresh water would be used to "make-up" water requirements for ore processing. The remainder of the total processing requirement, comprising roughly two-thirds to three-quarters of the total processing requirement, would not be fresh. Non-fresh water includes recycled process water and runoff."

As outlined in Section 2.1.2, the project is permitted for 11,300 acre-feet per year from the NDWR. Section 2.1.2.1 discloses that construction water pumping would occur at a low rate for 12 months before the wellfield supply system is completed. The use of water during the reclamation phase of the Project would be a small amount of water and less than that amount analyzed in the DEIS.

Comments

Letter 363 Comment 3, Letter 803 Comment 39, Letter 859 Comment 14, Letter 859 Comment 20, Letter 859 Comment 25, Letter 859 Comment 27, Letter 859 Comment 28, Letter 859 Comment 29, Letter 859 Comment 40, Letter 859 Comment 41, Letter 859 Comment 48

CC-022-General Opposition to the Project

Commenters expressed general opposition to the project.

Response

General opposition to the Project noted.

Comments

Letter 360 Comment 1, Letter 361 Comment 1, Letter 369 Comment 4, Letter 385 Comment 1, Letter 385 Comment 9, Letter 386 Comment 9, Letter 390 Comment 1, Letter 391 Comment 9, Letter 392 Comment 1, Letter 393 Comment 1, Letter 394 Comment 1, Letter 395 Comment 1, Letter 396 Comment 1, Letter 397 Comment 9, Letter 398 Comment 1, Letter 401 Comment 9, Letter 403 Comment 9, Letter 404 Comment 1, Letter 404 Comment 10, Letter 405 Comment 9, Letter 407 Comment 1, Letter 793 Comment 1, Letter 794 Comment 1, Letter 797 Comment 9, Letter 798 Comment 1, Letter 798 Comment 3, Letter 799 Comment 1, Letter 801 Comment 9, Letter 802 Comment 7, Letter 809 Comment 1, Letter 816 Comment 1, Letter 816 Comment 4, Letter 819 Comment 1, Letter 820 Comment 7, Letter 823 Comment 15, Letter 834 Comment 1, Letter 834 Comment 8, Letter 835 Comment 1, Letter 839 Comment 8, Letter 840 Comment 1, Letter 841 Comment 9, Letter 844 Comment 8, Letter 844 Comment 9, Letter 845 Comment 4, Letter 847 Comment 10, Letter 848 Comment 9, Letter 849 Comment 9, Letter 850 Comment 6, Letter 851 Comment 9, Letter 852 Comment 3, Letter 853 Comment 9, Letter 854 Comment 8, Letter 857 Comment 1, Letter 860 Comment 10, Letter 861 Comment 9, Letter 862 Comment 1, Letter 863 Comment 10, Letter 864 Comment 1, Letter 864 Comment 5, Letter 865 Comment 1, Letter 865 Comment 11, Letter 913 Comment 1

CC-023-Ten-Foot Drawdown Contour

Commenters expressed concern about use of the ten-foot drawdown contour. The analysis in the EIS should present and use the one-foot or five-foot drawdown contour as the measurement of potential impacts.

Response

Use of the numeric flow model to project potential drawdown at magnitudes of less than approximately ten percent of the local magnitude of drawdown becomes progressively uncertain as the threshold for drawdown prediction decreases. While the numeric model produces values of drawdown to small fractions of a foot, extrapolated over vast distances (the entire model domain), the numbers at this level of precision become an artifact of numeric processes rather than a representation of a physical reality. This is due to physical and mathematical simplifications necessary to model the regional flow system. While there is no standardized way of determining a reporting threshold, the value of ten feet is believed to be commensurate with the predictive qualities and uncertainties associated with this particular model. It is acknowledged that lesser degrees of drawdown can have impacts, however, modeling in this complex geologic setting has its limitations, and to report modeling results to very small thresholds would project a false level of model utility.

Comments

Letter 360 Comment 2, Letter 361 Comment 2, Letter 385 Comment 7, Letter 386 Comment 2, Letter 390 Comment 2, Letter 390 Comment 3, Letter 390 Comment 7, Letter 391 Comment 2, Letter 392 Comment 2, Letter 392 Comment 3, Letter 392 Comment 7,

Letter 393 Comment 2, Letter 394 Comment 2, Letter 394 Comment 3, Letter 395 Comment 3, Letter 397 Comment 2, Letter 401 Comment 2, Letter 402 Comment 2, Letter 403 Comment 2, Letter 404 Comment 3, Letter 405 Comment 2, Letter 407 Comment 5, Letter 797 Comment 2, Letter 799 Comment 2, Letter 799 Comment 3, Letter 801 Comment 2, Letter 802 Comment 3, Letter 809 Comment 5, Letter 820 Comment 2, Letter 823 Comment 1, Letter 834 Comment 6, Letter 835 Comment 5, Letter 839 Comment 1, Letter 841 Comment 2, Letter 844 Comment 2, Letter 847 Comment 3, Letter 848 Comment 2, Letter 849 Comment 2, Letter 851 Comment 2, Letter 853 Comment 2, Letter 854 Comment 3, Letter 855 Comment 32, Letter 855 Comment 58, Letter 855 Comment 118, Letter 855 Comment 122, Letter 859 Comment 52, Letter 859 Comment 70, Letter 859 Comment 71, Letter 860 Comment 3, Letter 861 Comment 2, Letter 862 Comment 3, Letter 863 Comment 3, Letter 864 Comment 4, Letter 865 Comment 4, Letter 908 Comment 1

CC-024-General Comments with No Specified Actions

Commenters have provided general comments.

Response

The commenter has provided a general comment that does not supply specific information that would result in a change to the EIS. Comment noted.

Comments

Letter 179 Comment 1, Letter 183 Comment 1, Letter 223 Comment 1, Letter 229 Comment 1, Letter 865 Comment 2, Letter 874 Comment 1, Letter 879 Comment 2, Letter 899 Comment 1, Letter 906 Comment 5, Letter 906 Comment 8

CC-025-Eureka County Plan Consistency

Commenter expressed concern regarding EIS consistency with the plans and policies in the Eureka County Master Plan. Additionally, the commenter requests the EIS to state that the Project would be in compliance with Eureka County codes.

Response

The BLM is not required to conform to Eureka County plans or policies, or to reject proposals that are not in conformance with those plans or policies. The Final EIS includes the following language suggested by Eureka County, "Some elements of the Proposed Action would be in conformance with Eureka County plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies." An appendix has been added to the EIS to identify inconsistencies with county plans and policies. The BLM has analyzed all of the impacts and attempted to reconcile conflicts and concerns where practicable. The appendix discloses the rationale behind any items that could not be reconciled. A sentence has been added to the end of the first paragraph in Section 1.5.4 that identifies this appendix.

Section 1.5.4 of the FEIS has been revised to include the following sentence, "The BLM acknowledges that EML would have to comply with any applicable Eureka County codes."

Comments

Letter 803 Comment 274, Letter 931 Comment 2

CC-026-Water Mitigation for Pine Valley

Commenter expressed concern regarding water mitigation for water resource impacts in Pine Valley. The analysis does not consider the time it would take for the Nevada State Engineer to authorize any necessary water permits for the implementation of the mitigation. There would not be sufficient water to implement the mitigation.

Response

If a supply of substitute water to Pine Valley was required for mitigation purposes, then the operator would be required to:
1. Purchase existing Pine Valley water rights;
a. Likely require a change application as well to be able to use the water where mitigation is required and for the specific use to be mitigated.
b. Temporary applications may be granted by the State Engineer in emergency situations and may be granted within a shorter time period than with permanent applications.
2. Obtain new temporary Pine Valley water rights;
3. Transfer existing water rights from Kobeh Valley;
4. Transfer existing water rights from Diamond Valley;
5. Transfer existing water rights from another hydrographic basin.

Because Diamond Valley is over-appropriated, the State Engineer may be reluctant to allow the transfer of water from that basin to Pine Valley. The interbasin transfer criteria that the State Engineer must consider are: (1) need to import the water, (2) whether a water conservation plan in the importing basin is advisable, (3) whether the proposed action is environmentally sound, and (4) whether the

proposed use is an appropriate long-term use that will not unduly limit the future growth and development in the exporting basin (NRS 533.370(3)).

If mitigation cannot be made by supplying a substitute source of water, then the State Engineer could order all pumping that is affecting the source to be stopped or reduced.

The model does not predict a complete cessation of flow. It is not expected under any scenario that mitigation will require pumping to replace the entire flow of the creek. It is expected that sufficient water will be available to augment creek flows if necessary. Technical documents support that conclusion.

Comments

Letter 803 Comment 126, Letter 803 Comment 127

CC-027-Spring Drain

Commenters express concern about the piping for the buried spring. The spring flow may contact waste rock and the piping may collapse.

Response

Appendix 3 of the Plan of Operations includes the design of the foundation drain that would be constructed to route water from the spring that would be located beneath the non-PAG WRDF. The design includes a system of collection pipes, geo-textile and synthetic liner to preclude contact with the non-PAG waste rock.

The conduit designed to convey spring flow to the outside of the non-PAG WRDF provides a method to retain the values provided by this water resource.

The EIS is not required to analyze worst-case scenarios.

Comments

Letter 803 Comment 45, Letter 858 Comment 11

CC-028-Post-Mining Pit Lake Model

Commenters expressed concern about the representation of the post-mining pit lake in the model. The pit lake may have a “flow-through” condition that would degrade the quality of adjacent ground water.

Response

Although there is a pre-mining groundwater level gradient across the pit area, by the end of mining this gradient is overwhelmed by the steep gradients into the pit, in all directions. As shown on the end-of-mining, 10-year and 50-year post mining groundwater level contours (Figures 4.5-6, 4.5-8, and 4.5-9, respectively; presented in the July 2010 Mt. Hope model report), the radically steep gradients towards the pit preclude any type of flow-through condition where pit lake water escapes the hydraulic pit sink.

As shown on the end-of-mining, 10-year and 50-year post mining ground water level contours (Figures 4.5-6, 4.5-8, and 4.5-9, respectively of the Montogmery & Associates and Interflow, 2010 report), ground water levels surrounding the pit are substantially higher than the pit lake surface elevation. In addition, the radically steep gradients towards the pit preclude any type of flow-through condition where pit lake water escapes the hydraulic pit sink. The steep gradients toward the pit would occur in unknown or unsimulated preferential flow paths; these preferential flow paths would not compromise the hydraulic sink shown on Figures 4.5-6, 4.5-8, and 4.5-9. No changes to the text of the EIS have been made in response to this comment.

Comments

Letter 858 Comment 23, Letter 858 Comment 24, Letter 858 Comment 25, Letter 858 Comment 26, Letter 858 Comment 27

CC-029-Roberts Creek Recreation Data

Commenters expressed concern about the data used for the analysis of Roberts Creek recreation. The EIS had little information on the recreational values of Roberts Creek. In addition, the EIS did not evaluate alternatives that would not impact Roberts Creek.

Response

The DEIS used all reasonable available data in the discussions of the affected environment and environmental consequences. The BLM met its obligations under NEPA to evaluate all reasonable alternatives to the Proposed Action. The alternatives evaluated in the EIS are presented in Section 2.2 of the document. No changes to the text of the FEIS have been made in response to this comment.

Comments
Letter 363 Comment 5, Letter 384 Comment 3

CC-030-Range Improvements
Commenters expressed concern about impacts to range improvements from the Project, as well as financial assurance of the responsible party and maintenance of range improvements impacted by the Project. Commenters request impacts to range improvements within the predicted ten-foot drawdown be analyzed.

Response
As disclosed in Section 3.12.3, no impacts to range improvements other than developed spring sites are expected. Range improvement projects that are located outside the Project Area including fences, water haul sites, and cattle guards would not be affected by the ten-foot drawdown. Impacts to springs and wells with water rights registered with the State Engineer within the ten-foot drawdown are mitigated in Section 3.2.3.3. EML would be responsible for the implementation of the mitigation, which would be specified in the ROD. No revisions have been made in the EIS in response to this comment.

Comments
Letter 803 Comment 238, Letter 855 Comment 49, Letter 855 Comment 138, Letter 855 Comment 139, Letter 855 Comment 140, Letter 855 Comment 142, Letter 855 Comment 144

CC-031-Impacts to Surface Water Quantity
Commenters express concern regarding impacts to water for livestock and wildlife. A loss or reduction of water would impact the use of the grazing allotment. The EIS must analyze the effect to cows and calves for a change in water availability.

Response
The EIS analysis accounts for potential impacts on all water rights and, as the comment notes, the EIS acknowledges that some rights may not be of public record. It is also clear that mitigation requirements apply to all water rights. Vested water rights are those that were established prior to enactment of Nevada's water law (1905). Subsisting rights are just vested water rights for stockwatering on public lands.

No change has been made to Table 3.2-6. NRS 533.367, referenced in the comment, requires a person seeking to appropriate water from a spring or seep to ensure that any wildlife that have been using the source will continue to have the ability to access it. NRS 533.367 does not apply because EML is not seeking to appropriate water from any spring source.

Comments
Letter 803 Comment 98, Letter 803 Comment 254, Letter 855 Comment 9, Letter 855 Comment 11

CC-032-Pit Lake Affects to Animals
Commenters expressed concern about the effects of the pit lake on livestock, wildlife, and wild horses. Commenters request that the EIS disclose animal drowning hazards and impacts from drinking pit lake water to animals.

Response
The analysis for the SLERA conservatively assumed that livestock would be able to access the pit lake. Reclamation of the open pit will include construction of berms intended to deter livestock. Following reclamation, the BLM would evaluate if the pit would be made accessible to livestock and wild horses.

Comments
Letter 855 Comment 157, Letter 855 Comment 159, Letter 855 Comment 161, Letter 855 Comment 162

CC-033-Data Adequacy
Commenters expressed concern regarding the water data sources used in the DEIS. Particularly, not enough weather station data were included in the data set for the ground water flow model, not enough stream flow measurements were considered, and not all the known springs were included in the ground water flow model.

Response
Data utilized for identification of hydrologic processes and potential impacts are comprehensive and sufficient for the purposes of the EIS.

Known springs and wells in the area of impact are identified using the referenced data sets. Specifically, springs are identified using USGS topographic mapping and Nevada Division of Water Resources water rights filings. The referenced "Gravel Pit Spring" is not

included in data sets, and is a unique surface water feature in the study area created by excavation of a gravel pit below the water table. As a modern and artificially created "resource", this is analogous to a pit lake, and is not subject to PWR 107. More importantly, this surface water feature is outside the ten-foot projected drawdown contour and should not be identified as a potentially impacted water resource.

Mean annual precipitation data is based on a number of regional stations including the Diamond Valley USDA and Eureka COOP stations (Table 3.2-1). The Diamond Range SNOTEL station, located approximately 25 miles from Mount Hope at an elevation of 8,000 feet amsl, has a period of record average precipitation quantity of 21.71 inches (28 years of record from WY1984 through WY2011). The Diamond Range SNOTEL station has been added to Table 3.2-1. The USBLM RAWS station data are not included in this compilation due to the type of equipment and operation of these weather stations, which deems them unreliable data sources for determination of annual precipitation quantities (not accurate for winter-time precipitation measurements). The Diamond Valley "agrimet" station is believed to be the same station, or very nearly located to, the Diamond Valley USDA site listed in Table 3.2-1.

Table 3.2-2 is a summary of USGS stream gaging locations. At the time of compilation of the this table for the DEIS, published data were not available for the recently established USGS Roberts Creek stream gage. Two months of data are now published for this gage for the time frame being reported in Table 3.2-2 (5-4-11 to 7-6-11), and Table 3.2-2 has been updated to incorporate these data. During this timeframe, there were four field measurements of flow, and the average flow from published daily flow values over this two month timeframe is 4,367 gpm.

The conditions of Roberts Creek, Coils Creek, Pete Hanson Creek, and many other streams in the study area are documented and disclosed, including identification of perennial and ephemeral stream reaches, and flow measurements available from EML, the USGS, and other referenced data sources.

All active water rights on stream sources are identified as determined from the Nevada Division of Water Resources (as referenced) which is the best data available for this purpose.

Comments

Letter 803 Comment 85, Letter 803 Comment 86, Letter 803 Comment 87, Letter 803 Comment 88

CC-034-AUM Reductions

Commenters expressed concern regarding the amount of AUM reductions on private land due to a loss of forage associated with the predicted ten-foot ground water drawdown. Additional mitigation for this impact is requested as well as economic and financial impact analysis in the EIS.

Response

The text under the Effects on Other Sectors of the Local Economy subheading in section 3.17.3.3.1 in the third paragraph, fourth sentence, has been revised in the FEIS to read as follows, "Mitigation would also be available for Project-related effects on agricultural production and livestock grazing and production resulting from the ground water drawdown (Sections 3.2.3 and 3.9.3)."

Comments

Letter 803 Comment 310, Letter 855 Comment 154

CC-035-Monitoring Concerns

Commenters expressed concern regarding the inclusion of monitoring in the mitigation measures. Commenters request that monitoring not be considered mitigation.

Response

Monitoring included as part of the proposed project does not meet the strict definition of mitigation. Monitoring is inlcuded in mitigation discussions to explain that implementation of mitigation would be determined for some resources by monitoring that would be required as a condition of project approval. The FEIS has been edited where necessary to make this distinction between monitoring and mitigation.

Comments

Letter 802 Comment 5, Letter 803 Comment 108

CC-036-Fences and Berms

Commenters express concern regarding the location of fences in the Project Area and potential impacts to livestock and wild horses if access to the pit lake occurs.

Response

Figures 2.1.1, 2.1.3, 2.1.5, and 2.1.8, in the EIS illustrate the location of the fence and the facilities located outside of the fenced area. Section 2.1.16 of the EIS describes the fencing that would be constructed and reclaimed by EML. Reclamation of the open pit will include construction of berms intended to deter livestock. Following reclamation, the BLM would evaluate if the pit would be made accessible to livestock and wild horses. No change has been made to the EIS in response to this comment.

Comments

Letter 855 Comment 99, Letter 855 Comment 158, Letter 855 Comment 160, Letter 855 Comment 171, Letter 855 Comment 172

CC-037-Surface Water Impact Duration

Commenters expressed concern regarding the duration of surface water impacts. The EIS needs to discuss how "at least 400 years" of impacts to surface water sources, relates to the sustainability of the resources, and the multiple use objectives of public lands.

Response

As outlined in Section 3.2.3.3 of the EIS ground water impacts are anticipated to last up to 400 years. However, impacts to surface water are not expected to last for the same duration. Impacts to the surface waters are adequately mitigated, as described in Section 3.2.3.3 of the EIS. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 859 Comment 76, Letter 859 Comment 78

CC-038-Roberts Creek Analysis and Mitigation

Commenters request additional analyses and mitigation be provided for Roberts Creek fisheries. Mitigation should be implemented if there is a reduction in flows. Any impacts to streams in the Roberts Mountain area would likely have some negative impact on the quality of life and recreational opportunities available to local residents and cannot be replaced by other sources.

Response

The water mitigation trigger has been revised to address impacts regarding a reduction in flow rather than full cessation. Implementation of water mitigation would benefit not just LCT in those creeks impacted by the Project, but other fish species as well. Mitigation has been provided for the loss of water flow in Roberts Creek (see Table 3.2-9), and states that water from the Project would be pumped to Roberts Creek to mitigate for the drawdown.

Direct and indirect impacts to the drawdown of Roberts Creek are discussed throughout the EIS in the following sections: Section 3.2 Water Resources - Water Quantity; Section 3.11 Wetlands and Riparian Zones; Section 3.12 Livestock Grazing and Production; Section 3.13 Wild Horses; Section 3.15 Recreation and Wilderness Study Areas; and Section 3.23 Wildlife and Fisheries Resources.

Comments

Letter 384 Comment 4, Letter 384 Comment 6, Letter 803 Comment 309, Letter 803 Comment 366, Letter 803 Comment 367, Letter 803 Comment 368, Letter 803 Comment 370

CC-039-Assumptions of Scope of Impacts to Springs

Commenters express concern with the assumptions use for the scope of impacts to springs. The paragraph states that surface and spring water flows affected by the ten-foot drawdown are assumed to be interconnected with the regional ground water system, but the next paragraph asserts that springs within the Roberts Creek drawdown area "…are not hydraulically interconnected with the regional ground water system." This statement contradicts the assertion made in the previous paragraph and has no data to support the conclusion.

Response

A report prepared by JBR and submitted to the BLM in May 2012 summarizes the results of a third field investigation to assess the degree of connection between the surface water flows in the Roberts Mountains and the regional groundwater aquifer. Based on this information, the text of the FEIS has been revised. The intent of the revision is to clarify that although data indicate a separation between the regional groundwater aquifer and superficial flows, such that ground water drawdown would not be likely to affect these surface flows, for identification of potential impacts and development of mitigation, it is conservatively assumed that these flows would be affected.

The text on page 3-85 of the DEIS reads, "Of the 22 potentially impacted springs, six appear to be associated with water rights (Table 3.2-6) and at least eight are considered perennial (Table 3.2-8). The identified potentially impacted perennial springs are all located at high elevations in the Roberts Mountains and on the flanks of Mount Hope, and within approximately four miles of the proposed open pit. The source of these springs is believed to be the fractured bedrock aquifer, which receives recharge from the higher elevations as infiltration of snowmelt and rainfall. It is possible that geologic block faulting has compartmentalized the ground water flow at some of these spring sites so that they would be isolated from mine-induced drawdown, but there is no available evidence to define such conditions if they exist. For the purposes of this analysis, it was conservatively assumed that all of the springs located in this area are interconnected with the regional ground water system and potentially could be impacted due to water-table lowering attributable to the Proposed Action. Surface water flow in Roberts Creek, located approximately 6.5 miles west of the proposed open pit, is fed by springs that flow into Roberts Creek or its tributaries. The upper spring-fed segments of Roberts Creek generally flow throughout the year, but the springs within the drawdown area that feed those segments are believed to originate in areas of localized, perched ground water that are not hydraulically interconnected with the regional ground water system."

This text will be revised in the FEIS to read, "Of the 22 potentially impacted springs, six appear to be associated with water rights (Table 3.2-6) and at least eight are considered perennial (Table 3.2-8). The identified potentially impacted perennial springs are all located at high elevations in the Roberts Mountains and on the flanks of Mount Hope, and within approximately four miles of the proposed open pit. The source of these springs is believed to be the fractured bedrock aquifer, which receives recharge from the higher elevations as infiltration of snowmelt and rainfall. Surface water flow in Roberts Creek, located approximately 6.5 miles west of the proposed open pit, is fed by springs that flow into Roberts Creek or its tributaries. The upper spring-fed segments of Roberts Creek generally flow throughout the year, and as with other springs in the upper elevations of Roberts Mountains, the springs within the drawdown area that feed those segments are believed to originate in areas of localized, perched groundwater that are not hydraulically interconnected with the regional groundwater system. It is also possible that geologic block faulting has compartmentalized the groundwater flow at some of these spring sites so that they would be isolated from mine-induced drawdown, but there is no available evidence to define such conditions if they exist. For the purposes of this analysis, it was conservatively assumed that all of the springs located in the area projected to experience ten feet or more of drawdown are interconnected with the regional groundwater system and potentially could be impacted due to water-table lowering attributable to the Proposed Action."

Comments

Letter 803 Comment 114, Letter 813 Comment 4

CC-040- Ranch Locations Relative to Project Area

The commenter is concerned regarding ranch locations near the Project Area.

Response

The intent of this text is to indicate the location of residences in different directions from the Project. the text has been revised to state "The nearest residences to the Project are the Roberts Creek Ranch to the west, Alpha Ranch to the north, and residences in Diamond Valley to the east and southeast, which are 6.5, 14.5, and 9.3 miles from the Project, respectively."

Comments

Letter 803 Comment 268, Letter 803 Comment 269

CC-041-Golden Eagle Mitigation

Commenters express concern regarding impacts to and mitigation for golden eagles. Specifically, the commenters request that the mitigation measure for golden eagles be revised to include mitigation.

Response

Mitigation Measure 3.23.3.3-8 has been revised to read as follows, "Mitigation Measure 3.23.3.3-8: All suitable golden eagle nesting habitat located within a five-mile radius of the Project Area boundary would be surveyed twice a year by a qualified biologist for the life of the Project to check the use status of golden eagle nests and habitat. If a nest is determined to be active, the nests would be monitored by video (with still images recorded every five minutes) and the recording would be reviewed by a qualified biologist once a week until the young have fledged. During the 18-month construction phase, the timing of weekly monitoring of active nests would occur from sunrise to sunset by video (with still images recorded every five minutes). During the 44 year mine life, the weekly monitoring for active nests would coincide with blasting activities. The video camera would record the nest beginning two hours before the blast and end two hours after the blast (with continuous video images recording). Annual reports would be submitted to the BLM biologist summarizing the results of the surveys. Following one year of monitoring, the qualified biologist would develop interpretable metrics to evaluate whether disturbance affects golden eagles. If there are impacts to golden eagles identified, the qualified biologist would coordinate with the BLM and USFWS to develop an adapative management strategy to mitigate impacts for subsequent years. If a negative impact to nesting golden eagles is detected during monitoring, the BLM biologist would be contacted by electronic mail or phone by the next business day."

Comments
Letter 409 Comment 11, Letter 813 Comment 15

CC-042-Climate Change
The commenter requests that a reference be included for the climate change discussion in section 3.9.2.2.4.

Response
The first sentence in Section 3.9.2.2.4 has been revised in the FEIS to read as follows, "Vegetation composition is integral to many functioning ecosystems." The second sentence has been revised in the FEIS to read as follows, "Potential changes in vegetation asssociated with projected effects of climate change may alter plant communities (U.S. Global Change Research Program 2009)." The text in Section 3.23.2.2.4 has been revised as follows, "The projected changes in climate ... change impacts on migratory aquatic species (U.S. Global Change Research Program 2009)." The following reference has been added to Section 6 of the FEIS, "U.S. Global Change Research Program. 2009. Global Climate Change Impacts in the United States. Thomas R. Karl, Jerry M. Melillo, and Thomas C. Peterson (eds.). Cambridge University Press."

Comments
Letter 803 Comment 209, Letter 803 Comment 365

CC-043- Indirect Cultural Resource Impacts
The commenter is concerned regarding potential cultural resource impacts to the town of Eureka and requests mitigation for these impacts.

Response
The Historic Town of Eureka is not within the area of potential effects (APE) for cultural resources. No change has been made in the FEIS in response to this comment.

Comments
Letter 803 Comment 354, Letter 803 Comment 355

CC-044- Impacts to Roberts Creek
The commenter is concerned regarding impacts to Roberts Creek. The EIS lacks analysis of potential impacts to other recreational game species that may be affected by changes to water resources.

Response
Mitigation in response to potential impacts to surface flow on Roberts Creek is included in section 3.2.3.3.1. No change has been made to the FEIS in response to this comment.

Comments
Letter 803 Comment 287, Letter 803 Comment 288

CC-045- Land Use Impacts
The commenter is concerned regarding impacts to land use, particularly to private lands.

Response
A new subsection has been added to Section 3.14.3.3 that discusses impacts to private land uses. The only direct effect will be to private land controlled by EML. All other effects to private land uses are indirect (i.e., associated with the ground water drawdown). This section will reference those sections of the EIS where those indirect effects are discussed (i.e., groundwater, range, wetlands).

Comments
Letter 803 Comment 270, Letter 803 Comment 272

CC-046- Slower, Longer Alternative Analysis
The commenter is concerned regarding the description of the Slower, Longer, Alternative in Chapter 2 of the EIS, as well as the impact discussion of this alternative in Chapter 3. The commenter requests that the day-to-day impacts from this alternative be given proper weight in the EIS.

Response
The section to which the commenter is referring is intended only to provide a description, not to influence the environmental analysis of the alternative. The DEIS analyzed and disclosed anticipated impacts from the Slower, Longer Project Alternative as required under

NEPA and CEQ regulations. The last sentence in the second paragraph under Section 2.2.4 has been revised as follows in the FEIS, "However, some aspects of environmental disturbance (i.e., wildlife) would be greater due to the extended duration." The DEIS disclosed the impacts from this alternative and has provided an explanation of how this alternative would be implemented.

Comments

Letter 803 Comment 74, Letter 803 Comment 276

CC-047-Water Availability

The commenters expressed concern regarding the amount of water available including a water budget. There is a failure to provide a water budget for existing water uses, the mining project, and the Project's proposed mitigation measures.

Response

Tables 3.2-13 and 3.2-14 of the EIS present in detail a water budget that includes the existing water uses. Tables 3.2-11 and 3.2-12 of the EIS present a water budget with changes to existing uses as a result of the Proposed Action. The Proposed Action water use includes water that may be necessary for implementation of mitigation measures.

Comments

Letter 803 Comment 6, Letter 803 Comment 7

CC-048-Water Mitigation for Wildlife and Horses

Commenters expressed concern regarding water use for mitigation of impacts to wildlife and horses. Commenters expressed concern regarding how water (and water rights) to implement mitigation for wildlife or wild horses would be obtained.

Response

Impacts to subsisting water rights may be mitigated under the authority of the State Engineer. Subsisting water rights do not apply to wildlife or horses. The BLM's mitigation plan provides that impacts to surface waters that provide water to wildlife and horses would be mitigated.

Comments

Letter 803 Comment 140, Letter 803 Comment 258, Letter 803 Comment 261, Letter 855 Comment 181

CC-049- Traffic impacts on SR 278

The commenter is concerned regarding increased traffic impacts on SR 278. The analysis omits any discussion of the impacts of increases in truck, bus, and passenger vehicle traffic. In addition, there is no analysis or description of what is considered "substantial" or "significant".

Response

The existing traffic data used in Section 3.19 of the FEIS has been updated to use the 2010 traffic data from the Nevada Department of Transportation website, as well as the 2012 truck trips by the Ruby Hill Mine on S.R. 278. The analysis in Section 3.24.3.3 in the FEIS has been revised to separate changes in bus use and to include truck traffic from toll roasting. A specific assessment of changes in car traffic can not be made since the number of employee personal vehicles that would be used is not reasonably known.

Comments

Letter 803 Comment 377, Letter 803 Comment 381, Letter 803 Comment 386, Letter 803 Comment 388

CC-050-Pinion-Juniper Woodland Encroachment

The commenter requests that the EIS address past, present, and future pinion-juniper woodland encroachment and expansion in the cumulative effects assessment analysis.

Response

These comments are beyond the scope of the EIS.

Comments

Letter 803 Comment 427, Letter 803 Comment 428, Letter 803 Comment 431, Letter 803 Comment 434

CC-051- Locally Defined Adverse Impacts

The commenter is concerned regarding locally defined adverse impacts and respective mitigation. The commenter wants mitigation to state that EML would purchase and retire at least an equal amount of currently pumped water in Diamond Valley in coordination with the NDWR.

Response

The drawdown impacts associated with Project do not appreciably propagate into Diamond Valley. See Section 3.2.3.3 in the FEIS for a discussion of impacts and mitigation. The breadth of the commenter's discussion of impacts is outside the scope of this EIS.

Comments

Letter 803 Comment 146, Letter 803 Comment 148

CC-052- Ground Water Pumping

The commenter is concerned regarding language in the DEIS relating ground water pumping. It is not clear what the phrase “EML would assess the distance of the screened interval and the pumping below the ground water table” means. Please add “with concurrence from NDWR”.

Response

The text in Section 3.2.3.3 of the EIS has been modified to clarify that the BLM would not implement mitigation for impacts to water rights, and that mitigation for impacts to water rights falls under the jurisdiction and responsibility of NDWR. In addition, text has been added to Section 3.26 of the EIS that outlines the types of mitigation that the BLM does not have the authority to require but could be required by other regulatory bodies, such as the NDWR.

Comments

Letter 803 Comment 137, Letter 803 Comment 139

CC-053-Air Quality Modeling

The commenter is concerned regarding the implementation of the air quality model used in the DEIS. When properly performed, the air quality modeling will demonstrate that 1-hour NO2 concentrations will be exceeded by the proposed mining operation. The statement regarding the irreversible and irretrievable impacts to air resources is suspect, especially given the exceedance of the new 1-hour NO2 standard.

Response

The model was revised to incorporate concerns identified by Eureka County and was performed in accordance with BLM-approved protocol. The results of the model are disclosed in the FEIS. The revised model demonstrates compliance with all NAAQS. The documentation for the revised model is available for review at the Battle Mountain BLM Office as part of the project's administrative record.

Comments

Letter 803 Comment 192, Letter 803 Comment 194, Letter 803 Comment 439

CC-054- Impacts to Water Wells

The commenter is concerned regarding impacts to water wells, and these impacts on livestock, wildlife, and wild horses. As previously requested, please add Roberts Creek Ranch domestic well into Table 3.2-10. Also add wells 204 and 310 since, as previously explained, they currently do not have rights associated with them as the table title suggests, and they are wells that may be affected

Response

It is not correct to state that the owners of wells 204 and 310 have at least a subsisting right to water livestock from ground water produced by the well. A subsisting water right is a vested right to use water from a water source located on public lands to water livestock that subsist mainly from grazing the surrounding public lands. See Itcaina v. Marble, 56 Nev. 420 (1956) (stating that defendant could not acquire any right to the water source at issue because he did not attempt to appropriate any water until 1909, and therefore, would have been required to file an application from the State Engineer's Office). Nevada law was changed in 1993 to allow a subsisting right to be proved by showing grazing use only as far back as 1950, but the right is still based on a pre-1905 use. If the subsisting right was not initiated prior to 1905 (for surface water) or 1939 (for ground water), then the person who intends to use the water must seek permission from the State Engineer to appropriate the water.

A subsisting right to ground water would require the well to have been constructed prior to 1939. Otherwise, the owners of wells identified as 204 and 310 would be required to obtain a ground water appropriation from the Nevada State Engineer.

Comments

Letter 803 Comment 132, Letter 803 Comment 135

CC-055-Mitigaition for Visual Impacts to Historic Trails

Commenters expressed concern regarding the lack of mitigation to the visual impacts on historic trials, and request that mitigation for this impact be developed in the EIS.

Response

Mitigation for visual impacts to the Pony Express Trail will be identified in the Historic Treatment plan. The FEIS has been revised to include mitigation for Impact 3.20.3.3-1. This mitigation would include photodocumentation to capture the setting and feel of the Pony Express Trail adjacent to the project that would be visually impacted.

The Treatment Plan would also include off-site mitigation in the form of GPS mapping and surveying of off-site portions of the Pony Express Trail located on public land. Segments would be selected at a 1:1 ratio of linear mileage based on the length of segments of the trail that would be impacted by the Project and are considered eligible as discussed in Section 3.21.3. Additionally, Mitigation Measure 3.7.3.3-1 would reduce visual impacts to users of the Pony Express Trail.

Comments

Letter 233 Comment 4, Letter 803 Comment 353

CC-056- Land Uses on Private Land

The commenter in concerned regarding land uses on private lands within the drawdown area.

Response

Text has been added to Section 3.14.2.2 of the FEIS that discusses the land uses on private lands adjacent to the Project Area in the area on the 10-foot drawdown. In addition, a reference to Figure 1.1.2 has been added to this section. This figure shows the land status in the Project Area, as well as most of eastern Kobeh Valley.

Comments

Letter 803 Comment 265, Letter 803 Comment 266

CC-057-Funding for Reclamation/Closure Bond

The commenters are expressed concern about whether the Project will have the appropriate level of funding for the reclamation closure bond and long-term funding for such tasks. The BLM should require the applicant to provide adequate financial assurance that long term controls and post-closure management will be implemented when necessary during and after mine closure or cessation of mining at some earlier period not foreseeable, but possible, due to market conditions or technical issues. The Draft EIS is inadequate because it does not disclose any detail on how BLM will ensure that funds will be available as long as they are needed to implement the closure and post-closure obligations.

Response

Should EML be required to implement mitigation, and should that mitigation consist of providing ground water to replace diminished surface water flows, EML would be responsible for obtaining the necessary water rights. It is anticipated that the water would come from EML's existing water rights. However, the water rights could come from transfer of existing EML water rights, purchase of water rights from other parties and transfer of those purchased rights as needed, or acquisition of new water rights in accordance with Nevada water law. Attempting to identify the exact mechanism for obtaining water rights, in such an eventuality, would be speculative.

As described in Section 2.1.16.1 of the FEIS, financial assurance for the project would include reclamation bonding and establishment of a Long-Term Funding Mechanism (LTFM) for potential post-reclamation activities. As shown in Table 2.1-10 of the FEIS, the anticipated reclamation schedule includes 30 years of post-project monitoring. It is not the BLM's policy to include the estimated cost of reclamation in NEPA documents. The reclamation and closure techniques are presented in the EIS to allow for review and comment on their adequacy. Reclamation and closure costs are time-sensitive, which is why the BLM Authorized Officer has the authority to review and require cost updates at any time to ensure bond adequacy.

In addition, as provided for in 43 CFR 3809.552(c), the BLM Authorized Officer has the authority to require additional bonding and/or a long-term trust. BLM previously identified the need for a LTFM, and the Final EIS includes a description of the components of that trust. As with reclamation bonding, BLM policy is to not disclose the cost estimate or calculations for LTFM in NEPA documents. However, the amount of reclamation costs and the LTFM would be disclosed in a ROD. The LTFM would be reviewed periodically to assess financial performance and adjusted as necessary to ensure that the available funds are adeqate to implement the components of the LTFM.

As long as a Plan of Operations remains active, the operator of record is liable for post-mining environmental issues, and would be required to maintain the financial assurances as determined adequate by the BLM.

The BLM is clearly following its 43 CFR 3809 Surface Management regulations as they direct preparation and use of reclamation bonds and LTFMs. Since this CEQ guidance "does not change or substitute for any law, regulation, or other legally binding requirement and is not legally enforceable," the BLM does not concur with the EPA's position (i.e., that the LTFM and reclamation bond information must be placed in the NEPA document). In addition, the following text has been added as a replacement of the text following the second sentence in the third paragraph under Section 2.1.16 in the EIS, "There is a potential for additional monitoring and maintenance tasks that would be required beyond the 30-year post-closure timeline that is currently included in the reclamation cost estimate. Financial assurance for these tasks would be provided outside of the reclamation bond by means of a Long Term Funding Mechanism (LTFM). The specifics of the LTFM and the amount of the assurance needed would be determined in cooperation with the BLM. The tasks to be covered by the LTFM include, but not be limited to, maintenance of pit perimeter fencing, monitoring of pit lake water quality, draindown from the PAG WRDF and the TSF, and maintenance of ET cells that would be constructed to manage long-term draindown from the TSF (the costs to convert the process ponds into ET cells is included in the Project reclamation costs and associated bond). Treatment of the pit lake water, the PAG WRDF draindown or the TSF draindown are not included because studies have indicated that there is no potential for any of these solutions to degrade water quality or otherwise present an environmental risk. Monitoring during operations and the 30-year closure period would be covered by the reclamation bond, and if information collected during this period indicates the need, the LTFM would be adjusted to include treatment. Maintenance of ET cells that would be constructed to manage long-term draindown from the TSF would include replacing the backfill. The ET cells would be designed simply to provide containment of draindown solution as it evaporates and backfill that would function as growth media for vegetation. Over long time periods, salts in the draindown solution that precipitate within the backfill could completely occupy the media pore space, affecting the viability of vegetation. The ET cell would continue to provide containment by means of its synthetic liner, and solution draindowns would decrease over time, reducing the amount of solution volume that would need to be contained. However, as a conservative measure, costs for ET cell maintenance would be included in the LTFM established as part of this Project. As stated previously, the maintenance specifics and costs would be determined in cooperation with the BLM."

In Addition, Section 2.1.16.1 of the EIS has been revised to provide details on the establishment of a Long-Term Financial Mechanism to ensure that addequate funding is available for the implementation of mitigation in the post reclamation and closure period.

Comments

Letter 803 Comment 19, Letter 803 Comment 131, Letter 823 Comment 5, Letter 824 Comment 5, Letter 824 Comment 6, Letter 855 Comment 52, Letter 859 Comment 79, Letter 859 Comment 96, Letter 859 Comment 130, Letter 941 Comment 2, Letter 941 Comment 3, Letter 941 Comment 5, Letter 941 Comment 11, Letter 941 Comment 13, Letter 941 Comment 14, Letter 941 Comment 15, Letter 941 Comment 16, Letter 941 Comment 17, Letter 941 Comment 19, Letter 941 Comment 23, Letter 941 Comment 24, Letter 941 Comment 25, Letter 941 Comment 26, Letter 941 Comment 50, Letter 941 Comment 63

CC-058-Visual Simulations

The commenter is concerned about the quality and accuracy of colors described and simulations of visual photos (KOPs) in the visual resource section.

Response

The visual simulations are only a representative image, and are not meant to replace actual conditions. It is not possible to simulate every color and/or light condition that may be present throughout the day or year.

Comments

Letter 803 Comment 196, Letter 803 Comment 197

CC-059-Impacts of Mitigation Implementation

The commenters suggest that the EIS should analyze all impacts associated with implementation of mitigation. Pleas provide the appropriate level of analysis to demonstrate that a particular mitigation strategy is technically feasible and practicable, not just an opinion that it will be effective.

Response

Replacement of diminished surface flows with ground water may require additional environmental analysis or permitting. Table 3.2-9 of the EIS outlines the anticipated mitigation for surface waters. However, this is only one of the mitigation options. Additionally, the extensive monitoring program would allow warning of potential impacts before they actually occurred so this additional analysis and permitting could be initiated before impacts occur. The text in the EIS has been revised to identify impacts from potential mitigation measures.

Comments

Letter 803 Comment 124, Letter 855 Comment 135, Letter 855 Comment 136, Letter 941 Comment 31

CC-060-PAG WRDF Design

The commenter recommends that the PAG WRDF should be capped with a goemembrane or equivalent, and include an additional cap and liner controls in the WRDFs to provide more robust source control to protect ware quality. Also, the commenter recommends the more conservative draindown response curves be used.

Response

The analysis presented in the EIS and the Plan of Operations demonstrates that the proposed design of the PAG and Non-PAG WRDFs are appropriate. No change has been made to the EIS in response to this comment.

Comments

Letter 941 Comment 6, Letter 941 Comment 56

CC-061-Mitigation Advisory Committee

The commenter requests that additional language be spelled out regarding the mitigation advisory committee in the EIS and requests that text be revised to state “The advisory committee will review and approve the water-related monitoring protocols, data, and reports, meet no less frequently than quarterly, and make recommendations to the BLM on operational changes or compliance issues.”

Response

The FLPMA does not require establishment of an advisory committee for approval of the Plan of Operations as the commenter suggests. Rather, 43 U.S.C. 1712(c)(9) describes coordination between the Secretary and other agencies for the development and revision of land use plans. Similarly, 43 CFR 1610.3-1(4) provides direction for the BLM on providing "meaningful public involvement of other Federal agencies, State and local government officials, both elected and appointed, and federally recognized Indian tribes, in the development of resource management plans, including early public notice of final decisions that may have a significant impact on non-Federal lands."

The text in Section 2.1.15 of the FEIS has been revised to read as follows, "In addition to the monitoring requirements consistent with 43 CFR 3809.401(b)(4), and applicant committed practices outlined for water resources, an advisory committee would be established as described in the water resources monitoring plan (Appendix C). Eureka County would be invited to participate on this advisory committee. The establishment of the advisory committee would allow participants to review the monitoring reports, meet on a periodic basis and comment on monitoring results." The DEIS already states that "The establishment of the advisory committee would be based on an agreement subsequent to the issuance of a ROD and Plan approval." Since this text is included in the Plan of Operations, then it would be authorized by the Plan of Operations approval which is part of the ROD. The BLM cannot grant the advisory committee the authority to "approve" water monitoring reports; therefore, this text has not been added in the FEIS.

Finally, Table 3.2-9 and Table 3.2-18 have been revised in the FEIS to indicate that a reduction of flow caused by the Project, rather than cessation, would be the threshold for the BLM to consider implementation of mitigation.

Comments

Letter 803 Comment 20, Letter 803 Comment 63

CC-062-Mitigation of Diminished Water Flows

The commenters express concern regarding the mitigation measures to replace diminished flows as a result of the Project. EML may need to obtain additional water use permits to comply with mitigation measures. In Table 3.2-9 and 3.2-18, mitigation measures call for substantial diversion rates that are over and above the 11,300 acre feet per year of appropriated water.

Response

The mitigation option that would replace diminished surface flows with ground water would require a volume of replacement established on the basis of base flows, since these base flows (as opposed to precipitation- and snowmelt-derived flows), are the only flow reductions that could reasonably be attibuted to the proposed project. These base flows vary for each of the sources identifed. Tables 3.2-9 and 3.2-18 in the EIS have been revised to report base flows for the potentially impacted surface waters. These base flow rates are substantially less than the values reported in the version of these tables included in the DEIS.

Should EML be required to implement mitigation, and should that mitigation consist of providing ground water to replace diminished surface water flows, EML would be responsible for obtaining the necessary water rights. It is anticipated that the water would come from EML's existing water rights. However, the water rights could come from transfer of existing EML water rights, purchase of water rights from other parties and transfer of those purchased rights as needed, or acquisition of new water rights in accordance with

Nevada water law. Attempting to identify the exact mechanism for obtaining water rights, in such an eventuality, would be speculative.

Comments

Letter 796 Comment 1, Letter 803 Comment 122, Letter 805 Comment 18, Letter 859 Comment 83, Letter 941 Comment 62

CC-063-RFFAs in Tables 4.2-3 and 4.2-4

The commenter is concerned regarding regarding the completeness and accuracy of data listed in Tables 4.2-3 and 4.2-4. Specifically, the commenter questions the acreages of wildland fires, noxious weed control activities, and mineral projects.

Response

Table 4.2-3 in the FEIS has been revised to read "436,600 acres" in the "Wildland Fires" row in the "RFFA" column. This value is based on an average yearly burn size of 5,900 acres, using BLM Battle Mountain District-wide data, over the RFFA 74-year timeframe. The value in the "Total" column in the "Noxious Weed Control Activities" row has been revised to "306" and the table's total and subtotal have been updated. The value in the "RFFA" column for "Noxious Weed Control Activities" row has been revised to "nq" as this value cannot be reasonably quantified. The use of "nq" does not indicate that the activities are not occurring or expected to occur, rather that the values cannot be reasonably quantified for this EIS. The values under the "Mineral Development and Exploration" section of Table 4.2-3 have been updated and include the Ruby Hill expansion.

Comments

Letter 803 Comment 411, Letter 803 Comment 420

CC-064-Scope/Scale of Impacts in EIS

The commenters express concern regarding the disclosure of impacts to several resources from the Project.

Response

The EIS discloses the potential effects of the Proposed Action on air quality (Section 3.6), water resources (Sections 3.2 and 3.3), traffic (Section 3.24), and noise (Section 3.16). No changes to the text of the EIS have been made to address this comment.

Comments

Letter 805 Comment 4, Letter 834 Comment 5, Letter 907 Comment 2

CC-065-Socioeconomic Impacts from the Project

The commenters are concerned regarding the impacts on agricultural jobs as a result of the Project. If air quality in Diamond Valley is negatively impacted and there is no available water for irrigation, that leaves more than four hundred employers and employees unemployed, sick from breathing dust and the people of the area may eventually be on food stamps. Our livelihood would be taken. Please also remember that Diamond Valley agriculture stimulated the economy and supports the food availability in the U.S.

Response

Section 3.2.3 and 3.6.3 of the EIS disclose the potential Project impacts to air resources and water resources. None of the potential impacts identified in these two section results in indirect effects to Socioeconomics. No changes to the text in the EIS have been made to address this comment.

Comments

Letter 369 Comment 3, Letter 370 Comment 4

CC-066-Impacts to Schools in Eureka

The commenters are concerned regarding the amount of children that will possibly be introduced to the area, and the impacts to the school system in Eureka. The school system in southern Eureka is high achieving and the education of our children will be compromised. New students entering the system typically are behind as soon as they enter because of Eureka’s current high achievement.

Response

Section 3.17.3 of the EIS discloses the potential impacts to the school system resulting from implementation of the Project. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 805 Comment 52, Letter 903 Comment 1

CC-067-Socioeconomic Impacts

The commenters are concerned that the socioeconomic analysis in the EIS does not cover all impacts. The farming industry, the existing environmental values, the existing natural resources, and existing prior rights should not be ignored despite the benefits of the Project.

Response

Section 3.17.3 of the EIS discloses the potential impacts to socioeconomics. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 384 Comment 8, Letter 907 Comment 3, Letter 907 Comment 6

CC-068-Traffic Impacts

Commenters express concern regarding the additional vehicles on highways near the Project, as well as the description of the current conditions on the road. The effects of adding additional vehicles should be reconsidered with new numbers from the Department of Transportation and new accident statistics from the Highway Patrol. The Existing Conditions section of the EIS describes the roads and their use, but fails to address the condition of the roads. SR 278 has no shoulders, is prone to flooding, has slow moving agriculture vehicles, and the school buses stop directly on the road. Snow removal from Alpha to Carlin is less certain than from Alpha to Highway 50. The presence of active agriculture transportation in Pine Valley is not adequately addressed in the DEIS. Slow moving hay delivery systems and tractors are part of daily life on SR 278 in Pine Valley. There are no shoulders in this area either, making it difficult for slow moving vehicles to pull over and providing little maneuverability for fast moving trucks and buses.

Response

The existing traffic data used in Section 3.19 of the FEIS has been updated to use the 2010 traffic data from the Nevada Department of Transportation website, as well as the 2012 truck trips by the Ruby Hill Mine on S.R. 278. Additionally, S.R. 278 is a public transportation route under the jurisdiction of the Nevada Department of Transportation. The condition of S.R. 278 is outside the scope of analysis for this EIS, however, suggested mitigation that that is outside BLM's jurisdiction is provided in Section 3.26 of the EIS that may be required by other regulatory bodies that may have jurisdiction.

Comments

Letter 265 Comment 1, Letter 265 Comment 2, Letter 265 Comment 3, Letter 265 Comment 5, Letter 265 Comment 6, Letter 803 Comment 346, Letter 803 Comment 347, Letter 803 Comment 376, Letter 803 Comment 378, Letter 803 Comment 379, Letter 803 Comment 383, Letter 803 Comment 384, Letter 803 Comment 422

CC-069-Mitigation for Impacts to Highways

Commenters express concern regarding the impacts to highways near the Project and request mitigation. An increase in 19 truck trips per day to deliver chemicals is an 85 percent increase over current truck trips, not the 15 percent stated in 3.24.3-1. Eureka County request the following mitigation, “EML would ensure that every effort be taken to bus the majority of employees to and from the Project site. EML will also provide policy to mine employees that cannot ride buses to car pool whenever possible. EML will also limit unnecessary visits to the Project area by vendors, contractors, and mine support services. EML will coordinate with Eureka County and NDOT to address any issues that arise on the transportation system by invitation from any, or all, parties. EML will develop an MOU with Eureka County before mine start-up to establish maintenance responsibilities by EML on County roads heavily used or impacted by Project activities.” Who is going to be responsible for picking up the new trash on Highway 278?

Response

The BLM has neither the authority to require, nor the mechanisms to enforce, the requested mitigation. However, EML has added a "Committed Practice" to the Plan of Operations that appears to provide all of the requested mitigation measures. The following text has been added to Section 2.1.14 of the EIS, "EML proposes to meet with Eureka County on a regular basis to provide project updates. These updates would be intended to provide information related to employment numbers, housing plans, transportation plans and other aspects of the Mt Hope project that would allow Eureka County to more effectively prepare for changes to the community and the potential for increased demands on county-provided services. In addition, EML would provide updates on taxes paid to state and local governments to allow a clear assessment of the impact on county services, in comparison to the revenues made available to deliver those services. EML would work with county staff to quantify potential gaps in revenue versus cost for services, should they occur. Further, EML would work with Eureka County to find ways to remedy any imbalance, such as providing necessary services at less cost, including contribution of EML resources.

In addition, EML proposes to work with Eureka County to identify ways to improve medical services and emergency response services for the community. EML would encourage employees to become active members of the volunteer fire and medical emergency response services."

In an effort to reduce traffic on existing roads, EML would provide bus or other multi-passenger transportation to employees. EML would also encourage car pooling among employees that do not elect to use company-provided transportation. EML would discourage unnecessary visits to the Project area by vendors, contractors, and mine support services. EML would coordinate with Eureka County and NDOT to address any transportation issues.

In addition, should there be sufficient interest, EML would establish and participate in a Mine Oversight and Liaison Yardstick Committee. This committee would be responsible for continually measuring effectiveness of these practices and identifying issues of concern to the local community."

Additionally, suggested mitigation that that is outside BLM's jurisdiction is provided in Section 3.26 of the EIS that may be required by other regulatory bodies that may have jurisdiction.

Comments

Letter 265 Comment 7, Letter 265 Comment 8, Letter 796 Comment 4, Letter 803 Comment 350, Letter 803 Comment 391, Letter 805 Comment 43

CC-070- Special Status Species Mitigation

The commenter is concerned regarding the potential impacts to species that could occur within the Project Area, but were not observed during surveys. The commenter requests that mitigation be developed for these species.

Response

The best available science indicates the three special status plant species do not occur in the Project Area. Investigations included field surveys, habitat analyses, and consultation with the appropriate agencies. No mitigation is necessary if these species are not located in the Project Area. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 803 Comment 215, Letter 803 Comment 216, Letter 803 Comment 217

CC-071-Alternatives to Water Use

The commenters suggest that the Proposed Action include additional alternatives for the use of water, including a holding reservoir. If the mine had chosen to purchase 22,600 acre-feet per year from private holders in Diamond Valley in return for pumping 11,300 af/yr from the Diamond Valley Hydrographic Basin, it would have eliminated the vast majority of environmental impacts related to this Project. The additional 11,300 af/yr would help alleviate the current over-drafting of the entirety of the Diamond Valley Flow System.

Response

The EIS incorporates a reasonable range of alternatives based on the scope of the Proposed Action and the purpose and need statement. No reasonable alternatives were identified that would eliminate all the impacts to potential water sources. No change has been made to the EIS in response to this comment.

Comments

Letter 179 Comment 2, Letter 363 Comment 7, Letter 859 Comment 93

CC-072-Project Impacts to Water Resources

The commenters expressed concern regarding the management of water resources as a result of the Project. The impacts of this Project could negatively affect the viability o the agricultural base in Eureka County. The long term total consumptive use of the Water Resource by the project is not environmentally responsible given existing water use challenges.

Response

The NDWR has issued EML their water rights for the Project. As outlined in Section 3.2 of the EIS the potential impacts to water resources has been analyzed. No change has been made to the EIS in response to this comment.

Comments

Letter 796 Comment 2, Letter 802 Comment 4

CC-073-Mitigation Impacts to Water Users

The commenters expressed concern regarding the impacts to water users other than the proponent as a result of the Project. The EIS fails to consider how compensation will be paid to affected water right holders and public water users if the Project causes adverse effects and mitigation efforts do not fully protect those persons.

Response

The BLM believes, based on the analysis in the EIS, that the mitigation of impacts resulting from the lowering of the water table can reasonable be expected to be effective. Impacts to water rights are under the jurisdiction of the NDWR. If an owner of a water right believes that their right has been affected, then the owner of that right would need to seek relief from the NDWR. The BLM does not have any authority to regulate water rights. No change has been made to the EIS in response to this comment.

Additionally, suggested mitigation that that is outside BLM's jurisdiction is provided in Section 3.26 of the EIS that may be required by other regulatory bodies that may have jurisdiction.

Comments

Letter 802 Comment 6, Letter 855 Comment 53, Letter 855 Comment 54, Letter 855 Comment 55, Letter 855 Comment 60, Letter 859 Comment 98

CC-074-Visual Inspections of Waste Rock

The commenters expressed concern regarding the PAG material management, as well as the identification and visual inspection methodology for segregation PAG from Non-PAG waste rock.

Response

The text in Section 2.1.3.2.2 of the EIS has been revised to read as follows, "As mining continues and the ore/waste model is refined, the model prediction of the sulfide content could be used along with selective laboratory analysis to route waste rock. The method of routing waste rock by using selective laboratory analysis and model predictions would be augmented with visual inspection of waste rock to further verify sulfide content, and comparison of model results with previously mined benches to confirm the accuracy of the predictive model. Authorization from the BLM and BMRR would be obtained prior to implementing this alternative waste segregation method."

Comments

Letter 803 Comment 46, Letter 859 Comment 42, Letter 859 Comment 44

CC-075-Water Use in the Proposed Action

The commenter is concerned that the EIS does not fully analyze the impacts to water use as a result of the Proposed Action. The EIS does not consider how much water will be necessary and from which sources the water will be appropriated. The EIS does not discuss an annual account of water use by EML under the Proposed Action.

Response

As outlined in Section 2.1.2, the Project is permitted for 11,300 afa from the NDWR. Section 2.1.2.1 discloses that construction water pumping would occur at a low rate for 12 months before the wellfield supply system is completed. The use of water during the reclamation phase of the Project would be a small amount of water and less than that amount analyzed in the EIS. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 859 Comment 15, Letter 859 Comment 17

CC-076-Partial Backfill Alternative Impacts

The commenter expresses concern regarding rationale for why the partial backfill alternative was not selected for anticipated water waste.

Response

A ROD would explain the reasoning for the selection of the approved alternative. The EIS discloses the potential impacts associated with the implementation of the alternatives. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 859 Comment 101, Letter 859 Comment 104

CC-077-Water Quality Associated with Storage Pond

The commenters are concerned regarding the potential water quality issues associated with a breach or leak in the settling pond. This is surely going to happen. A pond this size will certainly have leaks. The monitoring and mitigation outlined in the DEIS does not adequately address this issue.

Response

The TSF has been designed with a liner, drainage blanket, and solution recovery system to minimize hydrostatic head. The facility has been designed according to accepted engineering practices and leaks are not anticipated. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 823 Comment 10, Letter 906 Comment 3

CC-078-Impacts to Wild Horses

The commenters are concerned regarding potential impacts to wild horses as a result of the Project and the ground water drawdown. Commenters request additional data for the existing conditions for the HMAs as well as additional mitigation for loss of surface water.

Response

The BLM utilized the best available information in Section 3.13.2 of the EIS, which provides a description of the existing condition for HMAs. This description includes the number of horses that overlap with the Project Area and identifies the HMAs located within the area predicted to be impacted by the ground water drawdown. Section 3.2.3 includes mitigation for impacts to surface water impacted by the Project. Section 3.13.3 of the EIS discloses impacts to and mitigation for wild horses including development of additional water sources. Appendix D of the EIS includes details regarding the mitigation identified for wild horses. No change has been made in the EIS in response to this comment.

Comments

Letter 360 Comment 3, Letter 361 Comment 3, Letter 385 Comment 10, Letter 386 Comment 1, Letter 386 Comment 3, Letter 386 Comment 4, Letter 386 Comment 5, Letter 386 Comment 7, Letter 386 Comment 8, Letter 390 Comment 8, Letter 390 Comment 10, Letter 390 Comment 11, Letter 391 Comment 1, Letter 391 Comment 3, Letter 391 Comment 4, Letter 391 Comment 5, Letter 391 Comment 7, Letter 391 Comment 8, Letter 392 Comment 8, Letter 392 Comment 10, Letter 392 Comment 11, Letter 393 Comment 3, Letter 393 Comment 4, Letter 393 Comment 6, Letter 393 Comment 7, Letter 395 Comment 2, Letter 395 Comment 4, Letter 395 Comment 5, Letter 395 Comment 6, Letter 395 Comment 8, Letter 395 Comment 9, Letter 397 Comment 1, Letter 397 Comment 3, Letter 397 Comment 4, Letter 397 Comment 5, Letter 397 Comment 7, Letter 397 Comment 8, Letter 398 Comment 2, Letter 398 Comment 3, Letter 401 Comment 1, Letter 401 Comment 3, Letter 401 Comment 4, Letter 401 Comment 5, Letter 401 Comment 7, Letter 401 Comment 8, Letter 402 Comment 1, Letter 402 Comment 3, Letter 402 Comment 4, Letter 402 Comment 5, Letter 402 Comment 7, Letter 402 Comment 8, Letter 403 Comment 1, Letter 403 Comment 3, Letter 403 Comment 4, Letter 403 Comment 5, Letter 403 Comment 7, Letter 403 Comment 8, Letter 404 Comment 2, Letter 404 Comment 4, Letter 404 Comment 5, Letter 404 Comment 6, Letter 404 Comment 8, Letter 404 Comment 9, Letter 405 Comment 1, Letter 405 Comment 3, Letter 405 Comment 4, Letter 405 Comment 5, Letter 405 Comment 7, Letter 405 Comment 8, Letter 407 Comment 2, Letter 407 Comment 6, Letter 407 Comment 8, Letter 797 Comment 1, Letter 797 Comment 3, Letter 797 Comment 4, Letter 797 Comment 5, Letter 797 Comment 7, Letter 798 Comment 2, Letter 801 Comment 1, Letter 801 Comment 3, Letter 801 Comment 4, Letter 801 Comment 5, Letter 801 Comment 7, Letter 801 Comment 8, Letter 809 Comment 2, Letter 809 Comment 6, Letter 809 Comment 8, Letter 809 Comment 9, Letter 819 Comment 2, Letter 819 Comment 4, Letter 820 Comment 1, Letter 820 Comment 3, Letter 820 Comment 4, Letter 820 Comment 5, Letter 820 Comment 6, Letter 834 Comment 2, Letter 834 Comment 3, Letter 835 Comment 2, Letter 835 Comment 6, Letter 835 Comment 8, Letter 835 Comment 9, Letter 839 Comment 2, Letter 839 Comment 3, Letter 839 Comment 4, Letter 839 Comment 6, Letter 839 Comment 7, Letter 840 Comment 2, Letter 840 Comment 3, Letter 840 Comment 6, Letter 840 Comment 7, Letter 841 Comment 1, Letter 841 Comment 3, Letter 841 Comment 4, Letter 841 Comment 5, Letter 841 Comment 7, Letter 841 Comment 8, Letter 844 Comment 1, Letter 844 Comment 3, Letter 844 Comment 4, Letter 844 Comment 5, Letter 844 Comment 7, Letter 845 Comment 2, Letter 847 Comment 2, Letter 847 Comment 4, Letter 847 Comment 5, Letter 847 Comment 6, Letter 847 Comment 8, Letter 847 Comment 9, Letter 848 Comment 1, Letter 848 Comment 3, Letter 848 Comment 4, Letter 848 Comment 5, Letter 848 Comment 7, Letter 848 Comment 8, Letter 849 Comment 1, Letter 849 Comment 3, Letter 849 Comment 4, Letter 849 Comment 5, Letter 849 Comment 7, Letter 849 Comment 8, Letter 850 Comment 1, Letter 850 Comment 2, Letter 850 Comment 3, Letter 850 Comment 4, Letter 851 Comment 1, Letter 851 Comment 3, Letter 851 Comment 4, Letter 851 Comment 5, Letter 851 Comment 7, Letter 851 Comment 8, Letter 852 Comment 1, Letter 853 Comment 1, Letter 853 Comment 3, Letter 853 Comment 4, Letter 853 Comment 5, Letter 853 Comment 7, Letter 853 Comment 8, Letter 854 Comment 1, Letter 854 Comment 2, Letter 854 Comment 4, Letter 854 Comment 6, Letter 854 Comment 7, Letter 855 Comment 12, Letter 855 Comment 173, Letter 855 Comment 175, Letter 855 Comment 176, Letter 855 Comment 180, Letter 860 Comment 2, Letter 860 Comment 4, Letter 860 Comment 5, Letter 860 Comment 6, Letter 860 Comment 8, Letter 860 Comment 9, Letter 861 Comment 1, Letter 861 Comment 3, Letter 861 Comment 5, Letter 861 Comment 6, Letter 861 Comment 7, Letter 861 Comment 8, Letter 862 Comment 2, Letter 862 Comment 4, Letter 862 Comment 5, Letter 862 Comment 6, Letter 862 Comment 8, Letter 863 Comment 2, Letter 863 Comment 4, Letter 863 Comment 5, Letter 863 Comment 7, Letter 863 Comment 8, Letter 863 Comment 9, Letter 864 Comment 11, Letter 864 Comment 12, Letter 865 Comment 3, Letter 865 Comment 5, Letter 865 Comment 6, Letter 865 Comment 7, Letter 865 Comment 9, Letter 865 Comment 10

CC-079-Wild Horse Predators

The commenters object to the statement in the EIS that wild horses “lack true natural predators” since the mountain lion and coyote are significant natural predators.

Response

The BLM utilized the best available data to describe the affected environment for wild horses in Section 3.13.2 of the EIS. Wild horses are not native to the ecosystem, and thus, have virtually no natural predators. The text in the EIS has been revised to read, "virtually no natural predators" in accordance with the DOI's Factsheet on Challenges Facing the BLM in its Management of Wild Horses and Burros (http://www.blm.gov/wo/st/en/prog/wild_horse_and_burro/wh_b_information_center/blm_statements/new_factsheet.html).

Comments

Letter 360 Comment 4, Letter 361 Comment 4, Letter 390 Comment 4, Letter 390 Comment 5, Letter 392 Comment 4, Letter 392 Comment 5, Letter 394 Comment 4, Letter 407 Comment 3, Letter 799 Comment 4, Letter 809 Comment 3, Letter 835 Comment 3

CC-080-Fugutive Dust Emissions Mitigation

The commenter is concerned that the analysis does not employ mitigation measures to prevent impacts to vegetation and prevent fugitive dust emissions as employed in other projects. The EIS here should employ technologies to model the impacts of phreatophyte dislocation or death, and if such analysis reveals the impacts to be significant, the BLM must craft mitigation measures that will prevent fugitive dust emissions while also avoiding an invasion of non-native plants in affected areas.

Response

The following text in Section 3.8.3.3 has been revised in the FEIS to read as follows, "... An indirect effect to soils could occur as a result of the decline in the water table in Kobeh Valley due to the pumping of ground water for mine operations. This decline in the water table could result in a shift from a more hydric soil to a more xeric soil. This change in soil conditions could result in a shift in species composition and percent cover of phreatophytic vegetation in Kobeh Valley (Cooper et al. 2006). This change in vegetation species composition and percent cover should not result in a loss of vegetation sufficient to increase soil erosion. An additional indirect ...."

Section 3.8.3.5 has been revised in the FEIS to read as follows, "... Similar to the Proposed Action, an indirect effect to soils could occur as a result of the decline in the water table in Kobeh Valley due to the pumping of ground water for mine operations. This decline in the water table could result in a shift from a more hydric soil to a more xeric soil. This change in soil conditions could result in a shift in species composition and percent cover should not result in a loss of vegetation sufficient to increase soil erosion. An additional indirect ..."

Section 3.8.3.6 has been revised in the FEIS to read as follows, "... Similar to the Proposed Action, an indirect effect to soils could occur as a result of the decline in the water table in Kobeh Valley due to the pumping of ground water for mine operations. This decline in the water table could result in a shift from a more hydric soil to a more xeric soil. This change in soil conditions could result in a shift in species composition and percent cover should not result in a loss of vegetation sufficient to increase soil erosion. An additional indirect ..."

Section 3.8.3.7 has been revised in the FEIS to read as follows, "... Similar to the Proposed Action, an indirect effect to soils could occur as a result of the decline in the water table in Kobeh Valley due to the pumping of ground water for mine operations. This decline in the water table could result in a shift from a more hydric soil to a more xeric soil. This change in soil conditions could result in a shift in species composition and percent cover should not result in a loss of vegetation sufficient to increase soil erosion. An additional indirect ..."

Comments

Letter 803 Comment 12, Letter 803 Comment 201

CC-081-Analysis of Threats to Greater Sage-grouse

The commenter is concerned that the EIS does not fully address all threats to greater sage-grouse as a result of the Project in relation to other activities in the PMU and Battle Mountain District.

Response

Cumulative effects to greater sage-grouse are disclosed in Chapter 4 of the EIS. No change has been made to the EIS in reponse to this comment.

Comments

Letter 838 Comment 11, Letter 838 Comment 14

CC-082-Mitigation to Water Resource Impacts

The commenters expressed concern regarding the mitigation measures impacting water resources. The EIS's failure to treat this resource with requisite attention, detail, and quantification affects the sustainability of this resource on its own; but perhaps more importantly, the failure to protect water produces a failure to protect resources critical to Eureka County agriculture and recreation and the health and well being of the County's residents. Diamond Valley is already over adjudicated in water rights and is also inclined to be of an arid climate, therefore the Mt. Hope Project can, and will, have a negative impact on the water table in Diamond Valley and the farming industry in Diamond Valley.

Response

The EIS takes a hard look at potential impacts from ground water consumption by the proposed project. Monitoring to provide advance warning of impacts would be required as part of project approval. The EIS has been revised to make clear that mitigation may be required for Project-caused reductions, rather than "cessation" of flows. Enhancement or replacement of surface flows with ground water is one of the potential mitigation options, should impacts occur, as described in the EIS. The BLM may select other options from that list or identify other effective mitigation options, should impacts occur or be deemed imminent.

Should EML be required to implement mitigation, and should that mitigation consist of providing ground water to replace diminished surface water flows, EML would be responsible for obtaining the necessary water rights. It is anticipated that the water would come from EML's existing water rights. However, the water rights could come from transfer of existing EML water rights, purchase of water rights from other parties and transfer of those purchased rights as needed, or acquisition of new water rights in accordance with Nevada water law. Attempting to identify the exact mechanism for obtaining water rights, in such an eventuality, would be speculative.

The amount of water for mitigation at each potentially impacted water source is identified in Table 3.2-9 of the EIS. Implementation of mitigation outlined in Table 3.2-9 would be assessed on a specific basis as determined by the BLM. In addition, the potential impacts to wetlands and riparian are outlined in Section 3.11.3 of the EIS. If mitigation needs to be implemented as a result of ground water pumping in the well field area and north into the Roberts Creek drainage, the duration mitigation would need to be implemented would likely be less than 100 year as the table recovery would be more than 90 percent by that time (Figure 3.2.19 of the EIS).

In Addition, Section 2.1.16.1 of the EIS has been revised to provide details on the establishment of a Long-Term Financial Mechanism to ensure that adequate funding is available for the implementation of mitigation in the post reclamation and closure period.

Also refer to the Response to Group Comments CC-009.

Comments

Letter 363 Comment 1, Letter 384 Comment 1, Letter 409 Comment 3, Letter 409 Comment 4, Letter 796 Comment 3, Letter 803 Comment 3, Letter 803 Comment 125, Letter 803 Comment 138, Letter 803 Comment 255, Letter 805 Comment 12, Letter 805 Comment 14, Letter 823 Comment 3, Letter 823 Comment 4, Letter 824 Comment 1, Letter 836 Comment 2, Letter 855 Comment 8, Letter 855 Comment 13, Letter 855 Comment 29, Letter 855 Comment 40, Letter 855 Comment 41, Letter 855 Comment 42, Letter 855 Comment 45, Letter 855 Comment 47, Letter 855 Comment 57, Letter 855 Comment 189, Letter 859 Comment 16, Letter 859 Comment 46, Letter 859 Comment 69, Letter 859 Comment 82, Letter 859 Comment 86, Letter 859 Comment 87, Letter 859 Comment 88, Letter 859 Comment 89, Letter 859 Comment 90, Letter 859 Comment 91, Letter 859 Comment 117, Letter 859 Comment 120, Letter 859 Comment 121, Letter 859 Comment 127, Letter 859 Comment 128, Letter 859 Comment 129, Letter 859 Comment 133, Letter 859 Comment 134, Letter 907 Comment 5, Letter 928 Comment 2, Letter 941 Comment 1, Letter 941 Comment 7, Letter 941 Comment 8, Letter 941 Comment 27, Letter 941 Comment 29, Letter 941 Comment 30, Letter 941 Comment 34, Letter 941 Comment 35, Letter 941 Comment 59, Letter 941 Comment 60, Letter 941 Comment 61, Letter 941 Comment 67, Letter 941 Comment 68

CC-083-Project-related Acreage Disturbance

The commenter requests clarification on the acreage of disturbance associated with the Project as well as the extent to which acreage will be disturbed and how these acres will be reclaimed.

Response

Table 2.1-1 in the EIS describes the acreages associated with each Project-related disturbance type. Where relevant, the EIS discloses impacts associated with Project-related acreages in text. For a number of resources (water, air, visual, soils, vegetation, livestock grazing and production, wild horses, land use, recreation, historic trails, wildlife, and forest products) figures illustrate the Project-related impacts. These acreages have been updated to reflect the revised powerline portion of the Project Area. Project reclamation is described in Section 2.1.16 of the EIS. No change has been made to the EIS in response to this comment.

Comments
Letter 855 Comment 96, Letter 855 Comment 97, Letter 855 Comment 98

CC-084-Weed Control Mitigation
The commenter expresses concern that the EIS does not provide sufficient mitigation for weed control, and requests mitigation for 1) preventative and corrective measures, and 2) failed reclamation or noxious species establishment despite reclamation efforts. The commenter also requests that the EIS describe, in detail, how long weed control will continue beyond the scope of the Project and requests monitoring for and control of weeds under reclamation is complete.

Response
Section 2.1.14.7 of the EIS describes the noxious weed plan which includes preventative measures, treatment, and monitoring. Section 2.1.16 in the EIS describes reclamation and closure for the Project, which would be bonded for by EML and completed according to BLM and NDEP regulations. No change has been made to the EIS in response to this comment.

Comments
Letter 855 Comment 104, Letter 855 Comment 105, Letter 855 Comment 106, Letter 855 Comment 108

CC-085-Preventive Weed Control Mitigation
The commenter expresses a desire that preventive weed control measures be carried out in the Project Area and that these measures are disclosed in the EIS, and that the on-site storage of pesticides should be disclosed in the EIS.

Response
Section 2.1.14.7 of the FEIS has been revised to include a second paragraph that reads as follows, "The Project would have areas of disturbance, including those associated with ROWs, roads and travel corridors, where management for the prevention of invasion by noxious weeds and nonnative invasive plant species and infestation of rodents would be implemented. Nevada certified licensed applicators would be contracted, as necessary, to apply any chemical pesticides determined to be required to control invasive pests in accordance with federal and state laws and regulations. This would include both restricted-use and general-use pesticides as regulated by FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and NRS Chapter 555. All pesticides and herbicides would be used in accordance with their individual labeling, which contains the requirements and procedures for transportation, use, storage, and disposal."

Comments
Letter 803 Comment 57, Letter 855 Comment 107

CC-086-Impacts to Key Management Areas
The commenter is concerned regarding the potential impacts to Key Management Areas. The FEIS should acknowledge that the Mount Hope Project will impact KMAs and it should address, in detail, how these impacts will affect vegetation monitoring, data collection, and management practices.

Response
The BLM did not identify impacts to Key Management Areas as a result of the Proposed Action. In sections of the EIS identified by the commenter, potential impacts to Key Management Areas as a result of mitigation proposed for wild horses would be avoided. No change has been made to the EIS in response to this comment.

Comments
Letter 855 Comment 82, Letter 855 Comment 83

CC-087-Surface Disturbance Associated with Fencing
The commenter expressed concern regarding the surface disturbance impacts associated with the fence used for the project as well as what the reclamation measures will be.

Response
The EIS discloses impacts to resources from the Proposed Action. Impacts to resources within the fenced area as well as outside of the fenced area are disclosed in the EIS. No change to the EIS has been made in response to this comment.

Comments
Letter 855 Comment 100, Letter 855 Comment 101

CC-088-Roberts Mountain HMA and Allotment

The commenter requests that the DEIS disclose the acreage of the Roberts Mountain HMA and Roberts Mountain Allotment that is located within the Project Area.

Response

The EIS discloses the Project-related impacts to the Roberts Mountain HMA in Section 3.13.3.3 and impacts to the Roberts Mountain allotment in Section 3.12.3.3. Impacts to the Roberts Mountain Allotment were quantified based on the loss of AUMs within the fenced portion of the Project Area. No loss of AUMs are expected as a result of Project activities outside of the Project Area. Impacts to the Roberts Mountain HMA quantified the loss of habitat within the fenced area as well as loss of habitat as a result of the Project located outside of the fenced area. No change has been made to the EIS in response to this comment.

Comments

Letter 855 Comment 177, Letter 855 Comment 178

CC-089- Socioeconomic Impacts to Local Businesses

The commenter is concerned regarding the level of analysis associated with local businesses. The EIS also needs to examine the impacts to the value of the ranch operation as a result of a loss in the AUMs. The analysis fails to make the strong connection to impacts to individuals and family businesses, primarily the Etcheverry family at Roberts Creek Ranch.

Response

The text in the paragraph following Table 3.12-2 has been revised in the FEIS as follows, " The grazing and agricultural service sectors of the Eureka County economy would be marginally affected by the reduction in AUMs associated with the Proposed Action due to the construction of the fence around 14,204 acres of the Project Area. The fence would exclude access to portions of the Roberts Mountains and Romano Allotments and result in a reduction of 781 AUMs for approximately 70 years and 32 AUMs permanently from the development of the open pit. According to the Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada (Resource Concepts, Inc. 2001), the total economic impact associated with each AUM equals $53.40 (1999 dollars) ($73.75 in 2012 dollars) annually. This value specifically estimates the direct, indirect, and induced impacts of industry output and added value of grazing in Nevada. Applying this value to the potentially and temporarily AUMs displaced under the Proposed Action, the total economic impact could be an annual reduction of $41,705 (1999 dollars) ($57,597 in 2012 dollars). This would be a $15,539 (1999 dollars) ($21,460 2012 dollars) impact resulting from displaced Romano Allotment AUMs and a $26,166 (1999 dollars) ($36,137 2012 dollars) impact resulting from displaced Roberts Mountain Allotment AUMs. While the impact may not be significant to the ranching community, the impact may be meaningful to individual ranch operations. However, it is important that this impact reflects the total economic impact not lost revenue for specific operators. The subsequent two paragraphs in greater detail the economic impact to grazing investigated in the Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada Report." All the dollar values in this section of the range analysis have been revised to include 2012 dollar values in parentheses. The analysis can only reflect impacts to BLM-administered allotments, not individual ranch operations. The years for the dollar figures are parenthetically disclosed in the FEIS. The text in the FEIS also includes inflation-adjusted values based on the average consumer price index value. The BLM has conducted a reasonable and rational assessment of potential impacts to socioeconomics in the livestock sector. In addition, the text in the impact analysis for each of the alternatives has been revised to incorporate the permanent loss of AUMs.

The following text has been added to the third paragraph under subsection "Effects on Other Sectors of the Local Economy," which is under Section 3.17.3.3.1, " A large body of research has shown that public land grazing permits increase the property value of the ranch holding the permit, in most cases. Various factors have been explored to explain this effect. Significantly, the research has found that the added forage and relatively low permit fees for grazing on public lands do not entirely explain the increase in property value associated with the permit itself. Research has found that the added acreage associated with a public land permit is perceived as adding semi-private open space to the property and thus increases the value of the ranch. Examples of this research include Rimbey et al. (2007) and Torrell et al. (2005). This perceived value cannot be quantified. The permanent displacement of 32 AUMs associated with the open pit would unlikely affect any premium to the property value of the current permittee's ranch associated with the permit."

Comments

Letter 803 Comment 244, Letter 803 Comment 246, Letter 803 Comment 247, Letter 803 Comment 252

CC-090-Analysis in Table 4.3-1

The commenter expressed concern regarding the analysis in Table 4.3-1. The FEIS should specify how sampling locations will be selected, require that sampling be conducted at the same locations in the future, and identify the specific procedure employed for utilization studies. Furthermore, the FEIS should specify which key species will be measured for utilization at each location. The FEIS should clearly define condition scores for each category for which they are used, describe how the scores were determined, and explain how the scores will be used.

Response

As stated in the EIS, Table 4.3-1 includes BLM wildlife management objectives defined in the Shoshone-Eureka, Egan, and Elko Rangeland Program Summaries. These objectives are outside the scope of this EIS for the Project. No change has been made to the EIS in response to this comment.

Comments

Letter 855 Comment 130, Letter 855 Comment 131

CC-091-Wild Horse Analysis

The commenter expressed concern regarding the level of analysis used for wild horses in the EIS. As reported in the DEIS, current AML in the Roberts Mountain Complex already is being exceeded with currently available water sources and forage and the fecundity of these herds shows no potential for impact under the Proposed Action. Further, there is a call for an increase in water availability from sources that are not currently being used, nor have been in recent years (or really ever). The document must be consistent in its approach across resources and multiple uses.

It is invalid and unacceptable merely to combine HMAs on paper, and then declare them to constitute a metapopulation, a “complex”. This ploy is proffered by numerous BLM offices so that individual herd numbers can be kept well below what is needed for them to be genetically viable while pretending that they are right-sized. The alleged metapopulation – referred to as the Wild Horse Complex – along with BLM’s tales of horses cleverly getting around fences and through closed gates – does not pass muster. The stories are disingenuous. True reform is urgently required. These herd populations need to grow.

Response

An evaluation of the BLM's Wild Horse management system is beyond the scope of this EIS.

Comments

Letter 803 Comment 260, Letter 864 Comment 10

CC-092-Wild Horse Movement Patterns within HMA

Commenters express concern that the wild horse analysis fails to incorporate known patterns of movement that defy HMA boundary lines.

Response

HMA boundary adjustments are outside the scope of the EIS analysis for the Project. HMA boundaries can only be adjusted through the RMP process. HMA boundaries will be re-evaluated during the current RMP revision. No change has been made in the EIS in response to this comment.

Comments

Letter 386 Comment 6, Letter 391 Comment 6, Letter 393 Comment 5, Letter 395 Comment 7, Letter 397 Comment 6, Letter 401 Comment 6, Letter 402 Comment 6, Letter 403 Comment 6, Letter 404 Comment 7, Letter 405 Comment 6, Letter 797 Comment 6, Letter 801 Comment 6, Letter 839 Comment 5, Letter 840 Comment 4, Letter 840 Comment 5, Letter 841 Comment 6, Letter 844 Comment 6, Letter 847 Comment 7, Letter 848 Comment 6, Letter 849 Comment 6, Letter 851 Comment 6, Letter 853 Comment 6, Letter 854 Comment 5, Letter 855 Comment 174, Letter 855 Comment 183, Letter 860 Comment 7, Letter 861 Comment 4, Letter 862 Comment 7, Letter 863 Comment 6, Letter 865 Comment 8

CC-093-Private Property Impacted by the Project

The commenters are concerned with potential impacts from the Project to private property, as well as activities on private lands controlled by EML or their subsidiaries.

Response

Those activities on private lands that have been included as part of the Proposed Action are those activities that are tied to the applications that EML has submitted to the BLM. This includes the mining and processing activities on the private land on Mount Hope and the trucking of stockpiled gravel from the Romano Ranch for construction activities. Activities on private lands controlled by EML or their subsidiaries that are unrelated to the proposed mining operations are not connected actions under the NEPA. No changes to the text in the EIS have been made to address this comment.

Comments

Letter 805 Comment 2, Letter 907 Comment 1

CC-094-Long-term Water Mitigation

The commenter expresses concern regarding the long-term mitigation of water resources that involve man-made structures. The long-term effectiveness of the water mitigation is diminished by the fact that all other sources proposed for mitigation have strict reliance on anthropogenic maintenance that generally declines through time and has no guarantee of happening, even with a long-term trust account.

Response

EML would be required to either place a bond or a long-term financial instrument to ensure that the mitigation is appropriately implemented. No change has been to the EIS in response to this comment.

Comments

Letter 803 Comment 130, Letter 803 Comment 232

CC-095-Noise Impacts to Residents

Commenters expressed concern regarding noise impacts to nearby residences. The commenters request that the analysis must be redone to incorporate the sensitive receptors placed at residences that are much closer to the mine site than Alpha Ranch.

Response

As discussed in Section 3.16.2.1 of the EIS, the modeled noise impact analysis conducted for the Project conservatively did not account for topography. Therefore, it is expected based on the modeling that residences in Diamond Valley would experience noise levels equal to or more than those at the Alpha Ranch (0 dB increase) since the Diamond Valley residences are closer to the Project. Noise impacts to residences in Diamond Valley are expected to be less than those modeled for Roberts Creek Ranch (1 dB increase). No changes have been made to the FEIS in response to this comment.

Comments

Letter 803 Comment 289, Letter 805 Comment 47, Letter 805 Comment 48, Letter 805 Comment 49

CC-096-Ten-Foot Isopleth

Commenters expressed concern about the use of the ten-foot isopleth in the analysis. Commenters want an isopeth used that would show a smaller amount of drawdown (one foot or five feet).

Response

BLM believes that use of the maximum predicted ten-foot drawdown contour for evaluating potential impacts for the purposes of NEPA is correct.

There are several reasons why the ten-foot contour is reasonable. First, in most locations in Nevada, ten feet of change in ground water levels is within the range of seasonal ground water level variations. Second, the ground water modeling is less precise at predicting ground water changes at levels less than ten feet, particular in areas distant from the pumping sources. Models are mathemetical representations and simplifications of complex and incompletely understood systems; as such, using the hydrologic model to predict drawdown to a level less than ten feet does not represent the best science and is not needed for the BLM to take a hard look at the potential environmental consequences. BLM has relied and continues to rely on this methodology for identifying potential impacts. No changes to the text of the EIS have been made to address this comment.

As noted repeatedly in the FEIS, monitoring and mitigation of potential impacts are not limited by the predicted 10-foot drawdown contour. The comment is correct that impacts to surface resources can occur as a result of ground water changes of less than 10 feet and those potential impacts are incorporated into the environmental analysis. However, for purposes of identifying potential impacted areas on a large scale, the 10-foot drawdown contour remains the appropriate tool.

Comments

Letter 803 Comment 89, Letter 855 Comment 117, Letter 855 Comment 123, Letter 855 Comment 124, Letter 858 Comment 41, Letter 859 Comment 114, Letter 941 Comment 37

CC-097-2009 Steady State Condition

Commenters expressed concern about the use of 2009 as the steady state condition in the ground water flow model. We question the ability of the local model to accurately and adequately consider the impacts of the project given the arbitrary steady state of 2009. Please revise the local model to provide for a reasonable steady state condition and more defensible conclusions.

Response

Using 2009 as the steady-state year is acceptable because historical groundwater levels in the pit area are too sparse for calibration purposes and the data that are available support the conclusion that regional pumping has not affected pit area water levels.

At the time of model construction in 2009, historical ground water level data was available for an approximate four-year period of record (2006 through 2009) for six pit area monitor wells constructed in late 2005, and for two other wells near Mt. Hope. Hydrographs were prepared for these eight wells and are included in Appendix B (B-38 through B-45) of the Hydrogeologic Characterization Report (Montgomery 2010). Ground water levels in the mine area are discussed in Section 7.2 of the same report, including discussion of the eight wells with records from 2006 (Section 7.2.2). Five of the six wells in the mine area do not demonstrate a definitive trend. The sixth well, IGM-169, shows a gradual decline which may still be demonstrating a delayed equilibration after construction in low-permeability rock, rather than a regional decline. Of the two wells outside the pit area, one shows declining ground water levels; well IGM-158 located approximately 4.7 miles east from the pit in Diamond Valley on the edge of the local model domain. This well shows a ground water level decline of about three feet over the four-year period of measurement and may be responding to agricultural pumping in Diamond Valley.

The intent of the local model was to accurately determine ground water withdrawals from pit dewatering and pit lake development. These withdrawal stresses were then simulated in the regional model to evaluate impacts to the regional system. As noted in the comment, the regional model does show slight impacts in the mine area due to Diamond Valley agricultural pumping, over which impacts from pit ground water withdrawals are superimposed.

No changes to the text of the EIS have been made to address this comment.

Comments

Letter 803 Comment 102, Letter 858 Comment 42

CC-098-Recharge in the Model

Commenters expressed concern about how recharge was incorporated into the ground water flow model. There are two major points of error surrounding the water modeling that the BLM must consider in order for the EIS to be a complete disclosure document. These pertain to dewatering rates and the extent of drawdown around the pit lake and to whether the pit lake will be a terminal lake. The EIS estimated unrealistically high recharge rates on siliclastic rock on the Roberts Creek Mountains. The combination of high recharge near the massif and low conductivity near the pit prevents the drawdown from extending far north into the massif. The low conductivity near the pit lake limits the estimated dewatering rates at the mine; if the conductivity at the pit were as high as near the Roberts Creek Mountain massif, the dewatering rates could be much higher.

Response

Recharge quantities in the model were partitioned amongst the mountain ranges bounding the basins based on proportion of PRISM precipitation that each mountain range receives. Furthermore, recharge was partitioned between the mountain block, alluvial fan and major streams flowing across the alluvial fans. The recharge distribution was further refined for the siliclastic versus carbonate rock types in the Kobeh Valley portion of the Roberts Mountains.

Refinement of recharge in this area was deemed appropriate because of the proximity to the Project pumping center in Kobeh Valley and the desire to provide more refined calibration to water level and hydraulic property data at the southern base of the Roberts Mountains. Recharge zone 3 represents the carbonate rock terrain and thorough calibration efforts were assigned a recharge rate 4x, the rate representing recharge in the siliclastic rocks. Refinement of rock-type specific recharge partitioning throughout the model domain, including northern and eastern portions of the Roberts Mountains (recharge zones 40 and 63) and surrounding Mount Hope (variable recharge based on PRISM), was not deemed necessary to achieve a reasonable distribution of recharge on the regional scale. Revisions or refinements to lithologies in the areas near Mt Hope and throughout Garden Valley area nearest Mount Hope (Recharge Zone 63) would not have resulted in any changes to recharge distribution because the rock types are siliclastic.

Differences in recharge rates does however result for each hydrographic basin portion of the Roberts Mountains due to differing and independently determined water budgets for basin, which results in differing total quantities of recharge being assigned to the mountainous regions.

No changes to the text of the EIS have been made to address this comment.

Comments

Letter 858 Comment 30, Letter 858 Comment 53

CC-099-Salt Desert Scrublands

The commenters request use of the word "shrub" rather than "scrub" throughout the EIS.

Response
The word "scrub" is a technically appropriate term. No change to the FEIS has been made in response to this comment.

Comments
Letter 803 Comment 206, Letter 885 Comment 1

CC-100-Waste Rock Seepage
Commenters expressed concern about waste rock seepage analysis. Modeled WRDF seepage estimates are not provided in the Draft EIS to support any conclusions regarding the seepage movement through the non-PAG WRDF during the periods either before or after closure of this facility. Also, a contingency measure should be included to convert the non-PAG sedimentation ponds into ET cells after closure should monitoring of seepage from the non-PAG WRDF during operations indicate the need to preclude it from being discharged to surface waters.

Response
As described in the 2008 Mount Hope Project Waste Rock and Pit Wall Rock Characterization Report, a prediction of the concentrations of constituents that would likely be released from the waste rock facilities was completed using the USGS-developed software, PHREEQC. The resulting source term chemistry for the non-PAG WRDF predicts seepage with neutral pH (around 7 s.u.) and constituent concentrations below NDEP reference values for all constituents with the exception of manganese and aluminum. The source term modeling predicts that manganese would be elevated above the NDEP comparative values in the seepage at concentrations comparable to those observed in background groundwater wells for the Project and therefore no degradation of waters of the state are predicted (i.e., in the range of 1 mg/L). Aluminum is also predicted to be elevated above NDEP reference values in the non-PAG WRDF seepage. However, the predicted aluminum concentration of 0.87 mg/L is less than an order of magnitude higher than the respective reference value of 0.2 mg/L, indicating a low probability to degrade groundwater or surface water resources. Lead, zinc, and cadmium are not predicted to be leached from the non-PAG WRDF at concentrations above the NDEP reference values. Therefore, the predicted chemistry of seepage and run-off from the non-PAG WRDF indicates the level of protection that is proposed for the PAG WRDF is not warranted for the non-PAG WRDF.

A description of the source term modeling completed for the non-PAG WRDF is provided in the 2008 Mount Hope Project Waste Rock and Pit Wall Rock Characterization Report. The results of this modeling indicate a low probability to impact groundwater or surface water resources and further fate-transport modeling exercises are not necessary. Management of the non-PAG waste rock is adequate as proposed.

No changes to the text of the EIS have been made to address this comment.

Comments
Letter 941 Comment 43, Letter 941 Comment 44, Letter 941 Comment 45, Letter 941 Comment 46, Letter 941 Comment 47

CC-101-Waste Rock Characterization Adequacy
Commenters expressed concern about the adequacy of the waste rock characterization. We do not believe that the analysis is adequate to conclusively make the determination that there will not likely be acid generation, acid run-off, or a cid drainage. GBRW does not see the sampling rate for the Project to be sufficient.

Response
The geochemical assessment for Mount Hope waste rock utilized industry standard methodologies for assessment of acid neutralizing capacity. All rock types and alteration types and significant combinations of both were assessed in the study. In addition, qualitative support for the predictions came from leachate pH from static and kinetic leaching tests. The results conclude that there is a potential for some of the waste rock material to generate acid drainage. Waste rock generated during operations would be classified as PAG or non-PAG material and segregated for disposal. The material classified as PAG would be managed in the PAG WRDF designed with a low-permeable base layer in order to minimize the potential for downward migration of infiltration into the subsurface. Storm water that contacts the PAG waste rock would also be managed during operations and prior to placement of a reclamation cover in order to prevent impacts to surface water resources. The proposed waste rock management, PAG facility design and closure approach sufficiently address the potential for long-term water quality issues associated with the PAG waste rock. No changes to the text of the EIS have been made to address this comment.

Comments
Letter 803 Comment 158, Letter 858 Comment 5, Letter 858 Comment 6, Letter 858 Comment 21

CC-102-Riparian Vegetation Reclamation

The commenter requests that reclamation is carried out until riparian vegetation is successfully reestablished, and that it occur within the same grazing allotment from which it was disturbed. The FEIS should carefully detail subsequent action required if mitigation attempts are unsuccessful in restoring riparian and wetland areas.

Response

The last sentence of Mitigation Measure 3.11.3.3-3, 3.11.3.5-3, 3.11.3.6-3, and 3.11.3.7-3 have been revised to state, "EML, in coordination with the BLM, would identify sites for mitigation in the area affected and implement mitigation measures within one year of direct disturbance. EML would monitor these sites on an annual basis for at least three years after treatment to ensure effectiveness." The phrase "in the area affected" specifies that the mitigation would occur in the location where the vegetation is impacted (i.e., the same allotment).

Comments

Letter 855 Comment 133, Letter 855 Comment 134, Letter 855 Comment 137

CC-103-Water Quality Significance Criteria

Commenters expressed concern about water quality significance criteria. Why is degradation limited to only chemicals? Do “chemicals” include biological materials or other substances? If the water already exceeds standards for Mn, does the DEIS conclude that Mn releases in the draindown cannot degrade water quality?

Response

Based on the geologic information and hydrologic modeling that is presented in Sections 3.3 of the EIS, it is not expected that waters of the state will be degraded by the Mount Hope Pit Lake and BLM has determined that additional mitigation is not required. However, additional monitoring is warranted to refine available information and confirm that conclusion. The monitoring network for the Mount Hope Pit would (1) evaluate the impact of drawdown in the bedrock and alluvial aquifer from dewatering of the Pit lake, (2) provide additional geologic structure information, and (3) serve to determine the potential of a post-mining flow-through pit lake after the pit lake water level reaches approximately steady state. BLM, in coordination with NDEP, will continually evaluate the monitoring data and analysis through the life of the project, including the post-mining stage, to further understand the ground water and surface water hydraulics and any potential impacts to waters of the State. Based on further monitoring and evaluation, additional mitigation measures and bonding requirements can be implemented at any time during the life of the project if conditions warrant. EML would remain financially responsible for any additional mitigation that might be required.

The EIS uses appropriate criteria for impact significance determination. Impairment of designated uses would constitute a significant impact, whereas mere changes in chemistry that do not impair designated beneficial uses would not be significant. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 859 Comment 106, Letter 859 Comment 109

CC-104-Clarification of Mitigation Measure Impacts

The commenter expressed concern regarding the impacts and level of analysis for mitigation measures in the EIS. A figure should be added for mitigation measures in the EIS. A figure should be added to show the location of these features so the reader better understands the mitigation specified in Table 3-2.9.

Response

The EIS has been revised to include a map showing the location of the pipeline and any additional disturbance or facilities that would be required if ground water is pumped to mitigate decreased surface flows. Pumping ground water to mitigate for potential reduction of surface water flow is only one mitigation option identified in the EIS. Potential impacts from implementation of mitigation are disclosed in the EIS.

Comments

Letter 813 Comment 11

CC-105-Modeled Air Quality Impacts

Commenters expressed concern about the results of the air quality model. It seems to be that the best available data for quality is from Ely and Elko. Wind direction data is from Mercury. The proposal by EML contains a reference to consumption of 40,000 gal/day of diesel fuel in off-road equipment, this level of consumption is greater fuel use in one week than used in Diamond Valley and the town of Eureka on an annual basis. We believe this will have significant impacts on air quality especially in Diamond Valley not addressed by the BLM. The EIS does not identify any hazardous air pollutants (HAP) associated with the proposed Mount Hope roasters.

Response

The air dispersion model has been revised and the FEIS discloses the results of the updated model. Results from the revised model indicate that the 1-hour average SO2 concentration is higher than the 3-hour average.

Comments

Letter 803 Comment 180, Letter 805 Comment 24, Letter 805 Comment 26, Letter 805 Comment 29, Letter 805 Comment 31, Letter 813 Comment 13, Letter 816 Comment 3, Letter 907 Comment 7, Letter 941 Comment 74

CC-106-Run-on Channel Design

Commenters expressed concern about the design of the run-on channel for the North Tailings Facility. The Draft EIS states that the run-on diversion channel for the North Tailings Facility will not be designed until two years before closure.

Response

The comment is incorrect. The DEIS states (on page 2-195) that the design would be submitted to the BLM 24 months prior to the anticipated start of construction. No change to the text of the EIS has been made to address this comment.

Comments

Letter 941 Comment 57, Letter 941 Comment 58

CC-107-Air Quality Monitoring and Mitigation

Commenters expressed concern regarding impacts to air quality and request monitoring and mitigation. As the mine proceeds into operation, determining the Project's actual air quality impacts and effectively managing and mitigating them will require robust monitoring. The EIS does not require sufficient air quality monitoring or mitigation for air quality.

Response

The impact analysis demonstrates that the Project would meet the ambient air quality standards which are health-based standards. EML is required to conduct continued emissions monitoring for the roaster as part of their Class II permit. No change has been in the EIS in response to this comment.

Comments

Letter 803 Comment 14, Letter 805 Comment 30, Letter 823 Comment 11, Letter 824 Comment 2

CC-108-Scope of Cumulative Impacts

Commenters expressed concern regarding the scope of cumulative impacts to vegetation from greenhouse gas emissions, metal flue dust particulates, fugitive dust, or water shortages in Diamond Valley from the Mount Hope Mine.

Response

Section 4.4.7 of the EIS includes an analysis of all of the anticipated cumulative impacts to vegetation. No change to the EIS has been made in response to this comment.

Comments

Letter 805 Comment 36, Letter 805 Comment 37

CC-109-Purpose and Need

Commenters expressed concern regarding the purpose of and need for the Project. In addition to making arbitrary and capricious decision without evidentiary support, the BLM violated the Federal Land Policy and Management Act (FLPMA) and the 1872 Mining Law (as amended) by not requiring EML to pay Fair Market Value (FMV) for the use of public lands not covered by valid mining claims, based on the lack of any evidence that the vast majority of the claims at the Project site are valid under the Mining Law. Similarly, BLM's position also violates provisions of the FLPMA and the Multiple Use Sustained Yield Act and other laws mandating that BLM manages, or at least considers managing, these lands for non-mineral uses – something which BLM refused to do or consider in this case. The DEIS's review and the BLM's proposed approved of the Project are based on the overriding assumption that EML has statutory rights to use all public lands at the site under the 1872 Mining Law. However, where Project lands have not been verified to contain, such rights, the BLM's more discretionary multiple use authorities apply.

Response

The FLPMA and the 43 CFR 3809 regulations require that BLM prevent unnecessary or undue degradation of public lands by operations authorized under the mining laws, and anyone intending to develop mineral resources on public lands must prevent unnecessary or undue degradation of the land and reclaim disturbed areas. "Unnecessary or undue degradation" is defined at 43 CFR § 3809.5.

As discussed in Section 1.1 of the EIS, in order to use public lands managed by the BLM's Battle Mountain District Office, EML must comply with the BLM Surface Management Regulations (43 CFR 3809), BLM's Use and Occupancy Regulations (43 CFR 3715) and other applicable statutes including the Mining and Mineral Policy Act 1970 (as amended) and FLPMA. Also as discussed, the BLM must review EML's proposed plan of operations to ensure: (1) adequate provisions are included to prevent unnecessary or undue degradation of Federal lands; (2) measures are included to provide for reclamation of disturbed areas; and 3) proposed project activities comply with all applicable state and Federal laws.

In assessing compliance with the unnecessary or undue degradation standard, BLM looks at the law, the regulations, and agency guidance. The federal district court decision referred to in the comment, Mineral Policy Center v. Norton, 292 F.Supp. 2d 30 (D.D.C. 2003), affirmed the regulations, including the definition of "unnecessary or undue degradation" adopted in those regulations. Subsequent to the decision, BLM instruction memoranda have been updated to include the court's direction on this issue. BLM's analysis of EML's Plan of Operations (BLM NVN-082096) for the Mt. Hope Project complies with the statute, the regulations, and applicable guidance.

Additionally, the 43 CFR 3809 regulations require a validity examination only when an applicant: (1) Proposes operations on lands that have been segregated or withdrawn from the operation of the Mining Law or 2) applies for a patent. Neither of these conditions apply to the proposed project. Therefore, the BLM is not required to conduct a validity examination. This question also was addressed by a Solicitor's Opinion in 2005, which concluded that no law requires a claim validity determination before mine plan approval on lands open to the operation of the Mining Law (Solicitor's Opinion M-37012, November 14, 2005). As clarification, the Mineral Policy Center decision cited in the comment does not require that the BLM perform mineral validity examinations of unpatented mining claims or millsites, except where a plan of operations has been located on segregated or withdrawn lands, or an examination is necessary to determine whether the minerals are uncommon varieties (BLM Instruction Memorandum 2004-113 [March 11, 2004]).

BLM's Surface Management Regulations specifically do not require payment of fair market value for use of public lands for mining purposes. 43 CFR 3800.6.

Finally, these arguments have already been considered by the Interior Board of Land Appeals and the BLM's position has been affirmed. In Great Basin Resource Watch and Western Shoshone Defense Project, 182 IBLA 55 (2012), this commenter raised the same argument in appealing the BLM's decision approving a plan of operations for expansion of the Round Mountain Mine. The Board rejected the argument raised by the comment and, in fact, stated that it was "glaringly inconsistent" with applicable BLM regulations. 182 IBLA 67.

No changes to the text of the EIS have been made to address this comment.

Comments

Letter 385 Comment 2, Letter 858 Comment 49

CC-110- Impacts to Soils

The commenter is concerned regarding impacts to soils from flash floods, seepage under the PAG WRDF and cumulative impacts to soils from greenhouse gases, metal flue dust particles, and fugitive dust prior to capping or leekages from TSFs.

- **Comment acknowledged; does not provide new information**

Response

Impacts to soils from the Project are detailed in Section 3.8.3. Soil erosion is specifically discussed under Section 3.8.3 of the EIS. As outlined in the Proposed Action (Section 2.2 of the EIS), soils would be removed from the WRDFs prior to construction, therefore, if the was seepage beneath the WRDFs there would be no soils to be affected. Section 3.6 of the EIS analysis potential emissions of pollutants from the Project, including fugitive dust from the TSF, and as outlined in Section 3.6 of the EIS, the Project emissions would meet the ambient air quality standards, which are determined the acceptable emissions, using a health based standard. In addition, the emissions would be gaseous pollutants or particulates that would behave as gases. Therefore, these pollutants would not be deposited on the soils near the Project Area, but would instead disperse in the atmosphere.

Comments

Letter 805 Comment 33, Letter 805 Comment 34, Letter 805 Comment 35

CC-111-FLPMA Compliance

The commenter is concerned that the analysis does not meet the policy directions set forth in the FLPMA.

Response

The purpose and need are outlined in Section 1.4 of the EIS. No changes have been made to the EIS to address this comment.

Comments
Letter 385 Comment 3, Letter 385 Comment 12, Letter 802 Comment 1, Letter 823 Comment 13

CC-112-Potential Impacts to Air Quality
The commenters are concerned regarding potential impacts to air quality. It is essential that BLM ensure that the air quality of southern Eureka County is protected and that the EID discloses all air quality impacts as defined by federal standards and regulations.

Response
Section 3.6 of the EIS fully evaluates the potential impacts to air quality. No change has been made to the EIS in response to this comment.

Comments
Letter 254 Comment 3, Letter 254 Comment 5, Letter 368 Comment 4, Letter 369 Comment 2, Letter 370 Comment 3, Letter 836 Comment 4, Letter 906 Comment 4

CC-113-Project Mitigation and Monitoring
The commenter are concerned with the extent of mitigation measures and monitoring for the Project.

Response
See the Mitigation Plan in Appendix D of the FEIS. No change has been made to the EIS in response to this comment.

Comments
Letter 823 Comment 14, Letter 855 Comment 2

CC-114- Livestock Mitigation Measures
The commenter is concerned with the level of mitigation applied for livestock in the EIS. Revise to make it clear that EML will mitigate the impacts to grazing permittees, not “would work” to mitigate the impact. We request the revision to read, “EML will fully mitigate and offset the loss of AUMs as a result of the Proposed Action by agreement with impacted grazing permittees. For purposes meant to inform the discussion between EML and the impacts grazing permittee, mitigation could include, but is not limited to: 1) Provide a livestock forage seeding on federally administered land on which the impacted grazing permittee is authorized to graze livestock or on private land owned by the impacted grazing permittee; 2) Provide an alternative livestock watering source in any area where forage was previously unused or underused due to lack of a viable water source on either federally administered land on which the impacted grazing permittee is authorized to graze livestock or private land owned by the impacted grazing permitee; 3) implement a Rangeland Improvement Project on federally administered land on which the impacted grazing permittee is authorized to graze livestock or a project on private land owned by the impacted grazing permittee which would improve livestock production, forage availability, or rangeland condition (e.g., fencing, weed control, brush management, pinion-juniper thinning).” This language is consistent with (and nearly identical to) Eureka County’s policy regarding AUM loss.

Response
The mitigation measure has been revised in the FEIS to read as follows, "The BLM recommends that EML work with local permittees to offset the loss of AUMs as a result of the Proposed Action." The effectiveness of mitigation has been revised in the FEIS to state, "Ongoing cooperation with the local permittees would ensure the effectiveness of this mitigation and essentially reduce the AUM impacts to zero." The BLM does not have the legal authority to require implementation of the type of mitigation discussed in the comment. However, potential mitigation that may be implemented by other regulatory bodies has been added to Section 3.26 of the EIS.

Comments
Letter 803 Comment 251, Letter 855 Comment 17, Letter 855 Comment 143, Letter 855 Comment 147, Letter 855 Comment 149, Letter 855 Comment 151, Letter 855 Comment 166

CC-115-Baseline Conditions Used for Analysis
The commenter is concerned regarding the level of analysis used to determine baseline conditions in the EIS. The EIS does not accurately or adequately portray the severity of degradation that exists, the extensive desertification caused by livestock grazing, or the risk that continued grazing and other disturbances pose to native vegetation, native biota, and watersheds of this landscape. All rangeland aspects discussed in the FEIS should be analyzed based on Interpreting Indicators of Rangeland Health Version 4.

Response
The BLM used the best available data for assessing the baseline condition of the allotments located within the Project Area. No revisions have been made in the EIS in response to this comment.

Comments
Letter 838 Comment 7, Letter 855 Comment 65, Letter 855 Comment 66

CC-116-Mitigation for Eligible Cultural Sites
The commenter expresses concern regarding the eligible cultural sites within the Project Area and requests which segments of the Pony Express Trail would be mitigated under the Proposed Action. Commenters also request that the cultural resource treatment plan be included in the EIS for public review.

Response
The Pony Express Trail is one of the eligible cultural sites. This site, along with other sites are addressed under the Programmatic Agreement. Under the BLM's cultural resource program the implementation of the Programmatic Agreement, by definition, fully mitigates the affected cultural resources. Eligible cultural sites are not public information and the BLM does not disclose the location or specifics of the eligible sites. The property and Project are not being sold as part of the Proposed Action outlined in the EIS. No changes to the EIS have been made to address this comment.

Comments
Letter 233 Comment 2, Letter 233 Comment 3, Letter 858 Comment 45, Letter 858 Comment 46, Letter 858 Comment 47

CC-117-Reclamation after Project Completion
The commenter is concerned whether EML has the funding to reclaim the project site after the Project is completed. There could be a huge economic burden I the mine company files bankruptcy or refused to cover treatment costs.

Response
The regulations under 43 CFR 3809 require that EML post a bond in an amount determined by the BLM to be sufficient to reclaim the Project as outlined in the Plan of Operations. Section 2.1.16 of the EIS outlines the requirement of the establishment of a financial guarantee. No changes to the text of the EIS have been made to address this comment.

Comments
Letter 368 Comment 1, Letter 370 Comment 2, Letter 805 Comment 9

CC-118-Range Mitigation
The commenter requests additional water mitigation specific for livestock as well as other mitigation for loss of AUMs. The FEIS should clarify that mitigation for many water sources will preclude livestock use. The FEIS should be clear in its explanation that current mitigation for impacted water sources does not mitigate impacts livestock water sources.

Response
Mitigation for impacts to wild horses includes the development of a water source at the Romano stock well and five other sources (see EIS Mitigation Appendix, Attachment 2). Mitigation for water resources has been revised and is outlined in Section 3.2.3 in the EIS.

Comments
Letter 792 Comment 1, Letter 792 Comment 2, Letter 792 Comment 3, Letter 855 Comment 168, Letter 855 Comment 169, Letter 855 Comment 170, Letter 859 Comment 119

CC-119-Diamond Valley Sensitive Receptors
The commenter requests that the EIS include sensitive receptors in the Diamond Valley. Why were there not any sensitive receptors placed at any Diamond Valley residences, farms, or ranches? It is arbitrary to place a sensitive receptor at Alpha Ranch almost 15 miles to the north of the mine when dozens (nearly all) o the residences in Diamond Valley north of 6th street are as close, or closer, to the mine than Alpha Ranch.

Response
Sensitive receptors in Diamond Valley were added to the revised AERMOD dispersion model. The results of this revised model and the potential impacts to those sensitive receptors are included in the FEIS.

Comments
Letter 803 Comment 193, Letter 805 Comment 1

CC-120-Dust Control Mitigation

The commenter is concerned with mitigation measures to control fugitive dust. How much water would it take to wet 8,318 acres of disturbed Nevada surface so that it is not dusty during mine operations? Will the dust we breath contain toxic fugitive dust from the tailings facility?

Response

See Section 2.1.14 of the Proposed Action for the air quality control measures. Also see the air quality impact analysis in Section 3.6 of the EIS for the scope of anticipated impacts from the Proposed Action. No change has been made to the EIS in response to this comment.

Comments

Letter 805 Comment 22, Letter 805 Comment 23

CC-121-Lifestock Impacts

The commenter is concerned regarding potential direct and indirect impacts to livestock – including harassment, and reduced water availability – will interact and compound over time. The FEIS should include an analysis of impacts of the well field and associated disturbances on livestock grazing.

Response

The EIS discloses impacts to livestock grazing and production throughout the project area in Section 3.12.3. In addition, Table 3.2-9 in the EIS outlines the mitigation for water resources that are utilized by livestock. No change to the text in the EIS has been made in response to this comment.

Comments

Letter 855 Comment 132, Letter 855 Comment 146, Letter 855 Comment 150, Letter 855 Comment 156

CC-122-Recovery of Temporarily Lost AUMs

Commenters express concern regarding when temporarily lost AUMs would be recovered. If an impact were to occur to vegetation due to the Project, the areas re-vegetated would likely be subject to BLM grazing closures until the area were to meet BLM established objectives. Through no fault of their own, a grazing permittee would be impacted while re-vegetation efforts are taking place and would likely suffer large economic impacts.

Response

] Section 3.12.3.3 has been revised in the FEIS to include the following text after the second sentence in the paragraph directly preceding Impact 3.12.3.3-1, "Following reseeding, the BLM would evaluate and determine if there is a need to suspend livestock grazing for two years or until the objectives of the seeding are met."

Comments

Letter 803 Comment 250, Letter 855 Comment 152, Letter 855 Comment 153

CC-123-Analysis of Big Game and Livestock Habitat

The commenter is concerned regarding the analysis of the historic use of AUMs and big game habitat in the EIS. The FEIS should analyze present big game habitat and historical use and then provide quantified support for the proposed increase in big game habitat. The FEIS should also report an inventory of the current range conditions.

Response

This section of the EIS describes cumulative impacts. Impacts to AUMs from the Proposed Action are disclosed in Section 3.12.3 of the EIS. The assessment of the current condition of the range is disclosed in Section 3.12.2 of the EIS. No change in the EIS has been made in response to this comment.

Comments

Letter 855 Comment 67, Letter 855 Comment 69, Letter 855 Comment 70, Letter 855 Comment 71, Letter 855 Comment 165

CC-124- Significant thresholds for Grazing

The commenter requests the FEIS provide measurable thresholds for the significance criteria of livestock grazing.

Response

The BLM determined that the significance criteria identified in Section 3.12.3.1 are adequate for identifying impacts to livestock grazing and production. No change has been made in the EIS in response to this comment.

Comments
Letter 855 Comment 145, Letter 855 Comment 148

CC-125- Mitigation/Monitoring Plan
The commenters suggest that the BLM require a monitoring, management, and mitigation plan to address potential Project impacts.

Response
See Appendices C and D of the FEIS.

Comments
Letter 859 Comment 2, Letter 859 Comment 5, Letter 859 Comment 11, Letter 859 Comment 12, Letter 941 Comment 64, Letter 941 Comment 66

CC-126- Air Model Calculations
The commenter expresses concern regarding the methods utilized in the DEIS to calculate potential 1-hour NO2 impacts. We believe that there is an error in the modeling that has resulted in showing that the facility can comply with the one hour NO2 standard. There was no reason to change the pit from an OPENPIT source to a POINT source – in fact it should not be a POINT source, it is obviously an open pit and is appropriately characterized as an OPENPIT source, not a smoke stack.

Response
Fugitive emissions have been modeled as volume sources in the updated AERMOD model to address Eureka County's previous concerns with the modeling methodology. The Final EIS discloses the potential 1-hour NO2 impacts as well as the potential impacts for other modeled pollutants.

Comments
Letter 803 Comment 181, Letter 803 Comment 182, Letter 803 Comment 183, Letter 803 Comment 184, Letter 803 Comment 185, Letter 803 Comment 186, Letter 803 Comment 187, Letter 803 Comment 188, Letter 803 Comment 189, Letter 803 Comment 190, Letter 803 Comment 191

CC-127- Socioeconomic Impacts to Eureka County
The commenter is concerned regarding the socioeconomic impacts of housing and infrastructure development to Eureka County from the Project. The EIS fails to include a beneficial feature of the mine as initially proposed: the applicant's responsibility for housing for construction and mining workers. Without providing that the applicant meet this obligation, the EIS essentially forces the County to assume the entire financial risk and burden of investing now in the creation of housing, infrastructure, and public services to be available when Project construction begins.

Response
The BLM recognizes Eureka County's valid concerns regarding potential housing impacts to southern Eureka County from the Proposed Action. The BLM is confident that the EIS, as accurately as possible, discloses the potential housing impacts consistent with NEPA and other laws, regulations, and policies. The BLM's authority in requiring mitigation related to socioeconomic impacts, including housing, is extremely limited and related measures are generally outside the BLM's jurisdiction. Specifically, because the socioeconomic impacts would occur off BLM-administered lands, the primary responsibility for mitigating community social and economic impacts rests with state and local governments. However, BLM-administered lands will continue to be managed consistent with existing laws, regulations, and guidance. As such, the BLM would manage these lands such that any "unsupervised encampments of these workers as trespassers on federal lands" would not be anticipated. Impact 3.17.3.3-3 states "Significance of the Impact: This impact is considered significant and has both beneficial and potentially adverse aspects. No mitigation measures are proposed. Nevertheless, it is suggested that EML and Eureka County build on previous and current planning efforts to develop housing resources to accommodate the needs of the construction and operations-related population." The BLM continues to suggest that EML and Eureka County resume discussions, in good-faith, regarding planning options related to housing. In addition, the current Plan of Operations does not include any discussion of EML-provided housing for employees, even though it was incorporated in a previous version of the Plan of Operations. Therefore, the FEIS does not include any discussion in the Proposed Action. Section 3.17.3.3.3 includes a discussion of housing resources including EML's role in helping to develop additional housing in the Town of Eureka.

As stated above, the BLM does not have the legal authority to require implementation of the type of mitigation contemplated in the comment. In addition, a new Section 3.26 has been added to the EIS that outlines mitigation measures, such as those for socioeconomics, that are outside of BLM's jurisdiction to implement.

Comments
Letter 803 Comment 16, Letter 803 Comment 17, Letter 803 Comment 320, Letter 803 Comment 321

CC-128-Authority for Water Mitigation

The commenter expresses concern regarding the authority for implementing water mitigation. Most of the measures outlined would require further NEPA analysis and would contribute to the impact through a feedback loop. All references to “new water” or “new sources” should be removed as there will be no “new” water, but redistribution of water in the same hydrologic system. Please make it explicitly clear that curtailing the Project’s groundwater pumping is a mitigation measure provided in Nevada water law.

Response

As required by the NEPA, the EIS discloses the potential impacts from the proposed Project, including those to water sources on private land. Appendix D of the EIS is a mitigation plan to address potential impacts on BLM-administered resources on public lands. The EIS has been revised to include a new Section 3.26 that outlines potential mitigation measures that are outside the authority of the BLM to implement, but are reasonable and could be implemented by other regulatory agencies. The number of the section labeled "Relationship Between Short-Term Uses and Long-Term Productivity of the Human Environment" has been changed to Section 3.27.

Comments

Letter 803 Comment 120, Letter 803 Comment 128, Letter 803 Comment 129, Letter 803 Comment 136

CC-129- Baseline Air Pollution Levels

The commenter is concerned that the DEIS does not adequately discuss baseline air pollution values. The EIS’s air quality section fails to establish baseline air pollution values derived from monitoring within the affected area. The EIS instead utilizes data from several other locations around Nevada as its baseline for assessing the Project’s impacts.

Response

The BLM used the best available data in the DEIS. Typically, a PSD source is required to conduct onsite baseline air quality monitoring, at a regulatory agency's discretion. The proposed Mount Hope facility would not be a PSD source (it would not even be a Title V source), and therefore, it is not subject to regulatory requirements of onsite baseline air quality monitoring. The Mount Hope facility falls under the jurisdiction of the NDEP for air permitting, and BLM directed EML to follow NDEP's guidance in selecting the background concentrations for the air quality analysis. The revised modeling does not use the pollutant concentrations from Boulder City or Jean. However, O3 concentrations from Great Basin National Park are used as an input for the PVMRM option for NO2 modeling. The particulate matter background concentrations are NDEP-approved values to be used in rural unmonitored locations like the Mount Hope site.

Comments

Letter 803 Comment 8, Letter 803 Comment 9, Letter 803 Comment 10

CC-130- Cumulative Effects Analysis

The commenter is concerned regarding the methodology utilized to analyze cumulative effects. The EIS’s discussion of cumulative impacts fails to inform the public and decision-makers of the true likelihood and magnitude of such impacts. This failing results partially from the EIS’s analysis of artificially circumscribed cumulative effects study areas (CESAs) that ignore major projects barely outside of the CESAs borders but well within the range of cumulative impacts.

Response

The BLM utilized the approach in the CEQ's "Considering Cumulative Effects Under the National Environmental Policy Act". For each environmental resource affected by the Proposed Action, the BLM determined the geographic extent of that resource to be analyzed for cumulative impacts. This area is the cumulative effects study area in the EIS. The CESAs are supposed to focus on project-related effects. CESAs are designed so that the CESA boundaries are not so broad that the analysis does not become too unwieldy and not so narrow that significant effects are missed or decision makers would be incompletely informed about the consequences of the action. Based on the comments received on the DEIS, the BLM has determined that no substantive issues have been identified that would result in a change to the CESA boundaries.

The CESA boundaries for surface water and ground water were determined to be those sub-basins within which the Proposed Action had an effect to either surface water or ground water. The Proposed Action would have no effect to the Antelope Valley or Monitor Valley sub-basins; therefore, they were not included in the CESA for surface water or ground water. No changes to the text of the EIS have been made to address this comment.

Comments

Letter 254 Comment 4, Letter 803 Comment 18, Letter 803 Comment 398, Letter 803 Comment 401, Letter 803 Comment 402, Letter 803 Comment 405, Letter 803 Comment 406, Letter 805 Comment 38, Letter 805 Comment 39

CC-131- NEPA Compliance with Eureka County

The commenter is concerned that the DEIS does not comply with various Eureka County regulations and policies. The DEIS makes no effort to discuss these inconsistencies. Include the following language "Some elements of the Proposed Action would be in conformance with these plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies."

Response

The BLM requested that Eureka County identify all perceived inconsistencies in a letter dated May 30, 2012. On June 22, 2012, Eureka County provided a response that has been addressed in an appendix to the FEIS. The BLM is not required to reconcile all perceived inconsistencies, but the appendix discloses any reconciliation efforts or rationale leading to a lack of reconcilation where applicable. A sentence has been added to the end of the first paragraph in Section 1.5.4 that identifies this appendix.

Comments

Letter 803 Comment 29, Letter 803 Comment 32, Letter 803 Comment 245, Letter 803 Comment 275, Letter 803 Comment 295

CC-132-Spring Mitigation on Private Land

The commenter expresses concern regarding mitigation for springs located on private land. There is still a general downplay of impacts to phreatophytes, riparian vegetation, and wet meadows. This is a great example of how the impacts to private property are not disclosed or discussed.

Response

Where there is the potential for the loss of forage on private land (which would include riparian areas associated with flowing streams and springs, wetlands, as well as areas of greasewood, rabbitbrush, saltgrass, and meadow grass) mitigation is identified in Sections 3.2.3, 3.9.3, and 3.11.3. This mitigation in water, vegetation, and wetlands indirectly addresses the potential loss of forage on private land. An exception to this is where there are springs located on private land that are within the ten-foot drawdown, the BLM cannot require mitigation be implemented. Therefore, there is a potential loss of forage associated with the loss of those specific springs and this has been disclosed in the EIS. No changes have been made in the FEIS in response to this comment.

Comments

Letter 803 Comment 211, Letter 803 Comment 231

CC-133-Greater Sage-grouse Lek Sensitive Receptors

The commenter requests that the document provide language regarding sage-grouse leks as sensitive receptors. The BLM's new IM states that projects that raise the noise level 10 dBA above ambient can have a significant impact on greater sage-grouse lek activity. This analysis should be reevaluated.

Response

In order to be consistent with BLM Instruction Memorandum No. 2012-044 (Attachment 1: Sage-Grouse National Technical Team - A Report on National Greater Sage-Grouse Conservation Measures), which identifies an impact to greater sage-grouse leks with an increase of 10 dB above ambient noise levels during active lek season, Sections 3.16.3 and 3.23.3 have been revised as follows. Section 3.16.3 has been revised to remove reference to a 55 dB increase impacting greater sage-grouse. Section 3.23.3 has been revised to describe where greater sage-grouse leks occur relative to the 10 dB modeled increase in noise. Conservation measures included in Appendix D, Attachment 3 have been included to mitigate impacts to greater sage-grouse leks from the noise at the booster pumps in Kobeh Valley.

Comments

Letter 409 Comment 5, Letter 409 Comment 6, Letter 409 Comment 7, Letter 803 Comment 290, Letter 803 Comment 292, Letter 838 Comment 12

CC-134- NEPA Significance Threshold and Mitigation

The commenter expresses concern regarding the NEPA significance threshold and respective mitigation. The CEQ regulations refer to both significant effects and significant issues (for example, 40 CFR 1502.2(b)). The meaning of significance should not be interpreted differently for issues than for effects: significant issues are those issues that are related to significant or potentially significant effects."

Response

As stated in 40 CFR 1502.1, "The primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies

shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data."

Also see 40 CFR 1502.16, which states that an EIS "shall include discussions of:
(a) Direct effects and their significance (Section 1508.8).
(b) Indirect effects and their significance (Section 1508.8)."

Therefore, discussion of significance in the EIS is appropriate and no change has been made in response to this comment. The NEPA does not require that the analysis disclose every potential impact or develop mitigation for every impact identified. Mitigation measures in the FEIS are identified for impacts that by themselves would not be considered "significant" and mitigation measures have been developed where it is feasible to do so (43 CFR 1502.14(f), 1502.16(h), 1508.14).

Comments

Letter 803 Comment 25, Letter 803 Comment 285, Letter 803 Comment 371