

*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.)
<b>TOTAL POPULATION IMPACT</b>								
<b>Base Case:</b> (Mount Hope Socioeconomic Study)	660	895	603	650	739	362	173	
<b>SA 1:</b> Modified Base Case – Infill	660	895	678	729	830	405	196	
<b>SA 2:</b> 30% Relocating HHLDs <sup>1</sup>	660	895	584	630	719	351	168	
<b>SA 3:</b> 50% Relocating HHLDs <sup>2</sup>	660	895	795	853	974	472	231	
<b>SCHOOL AGE CHILDREN</b>								
<b>Base Case:</b> (Socioeconomic Study)	26	37	96	105	118	58	28	
<b>SA 1:</b> Modified Base-Case – In-fill <sup>3</sup>	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	
<b>SA 2:</b> 30% Relocating HHLDs <sup>3</sup>	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	
<b>SA 3:</b> 50% Relocating HHLDs <sup>3</sup>	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	

<sup>1</sup> 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.

<sup>2</sup> 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.

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

<sup>4</sup> 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).

<sup>5</sup> 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					
2.	Operations Direct		400 <sup>6</sup>	455	222	107
3.	Secondary jobs multiplier		0.35	0.35	0.35	0.35
4.	Secondary Jobs		130	140	78	37
6.	Local Labor & Daily Commuters <sup>7</sup>					144
7.	Jobs Filled by Local Labor & Commuters		20%	20%	20%	20%
7a.	In-fill Local Jobs to be Filled		100	107	60	29
8.	New Non-Local Labor Needs		44	47	26	13
9.	Avg. Jobs / Household (HHLd)		445	480	266	118
10.	New IHHLds		1.36	1.36	1.36	1.36
11.	Avg. HHLd Size <sup>8</sup>		327	353	197	94
13.	Population in Construction Camp		2.07	2.07	2.07	2.07
14.	Population in Community		0	0	0	0
14a.	Weekly Commuter		678	729	830	196
14b.	Resident Population		148	160	182	43
15.	School Age Children (% of Resident Pop. [14b])		530	569	648	153
17.	Elementary Students (% Share)		20% - 23%	20% - 23%	20% - 23%	20% - 23%
18.	Middle/High School (% Share)		70% - 50%	70% - 50%	70% - 50%	31 - 35
19.	Elem Students		30% - 50%	30% - 50%	30% - 50%	70% - 50%
20.	Middle/High Students		74 - 61	80 - 66	91 - 75	30% - 50%
			32 - 61	34 - 65	39 - 74	16 - 18
					19 - 36	15 - 17

SAME AS THE BASELINE ASSESSMENT

<sup>6</sup> Average

<sup>7</sup> Weighted average of construction, operations and secondary, which are disaggregated in Table 20 of the Mount Hope Project Socioeconomic Assessment).

<sup>8</sup> 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 3: 50% of Mt. Hope Direct Jobs Filled by Relocating Households**

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

SAME AS THE BASELINE ASSESSMENT

<sup>12</sup> Assumes that all jobs vacated by existing local employees who accept employment at the mine would be filled by additional relocating worker households.

<sup>13</sup> Assumes that the percentage of secondary jobs filled by relocation households would be 35% compared to 45% in the socioeconomic assessment

<sup>14</sup> 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 deficiencies.*

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

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

*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.*

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

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:

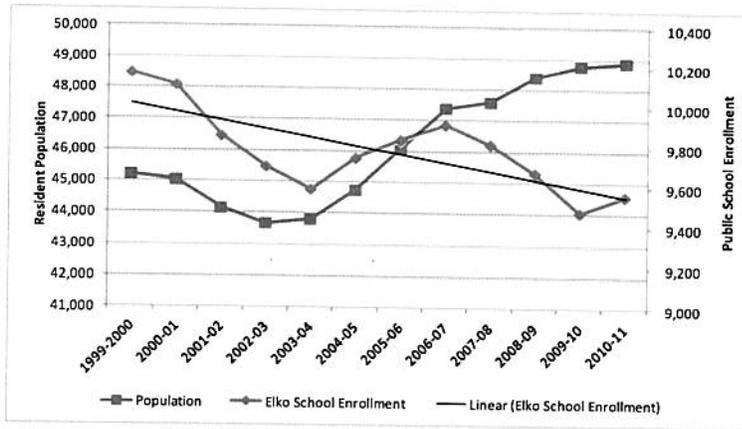
- 1) The average household size among Americans has been declining. In Eureka County the average household size declined from 2.48 to 2.38 between 2000 and 2010. In Elko County the decline was even greater; from 2.97 to 2.77. Statewide the average household size was 2.65. Note: at the request of Eureka 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 1<sup>st</sup> 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.

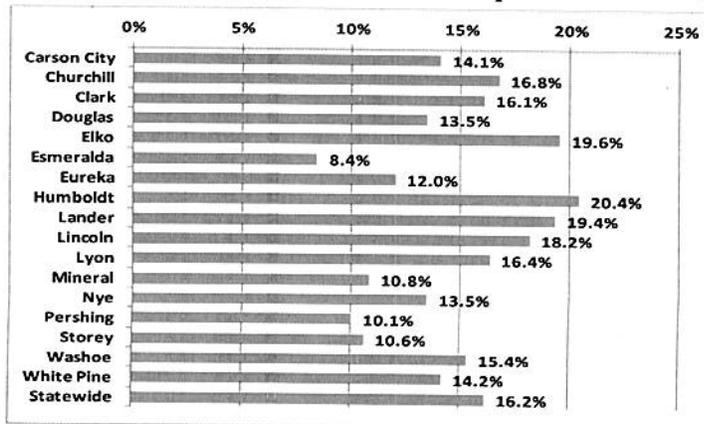
**Figure A: Elko County Population and Public School Enrollment Trends**



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 labeled "Linear") has trended downward over the past decade.

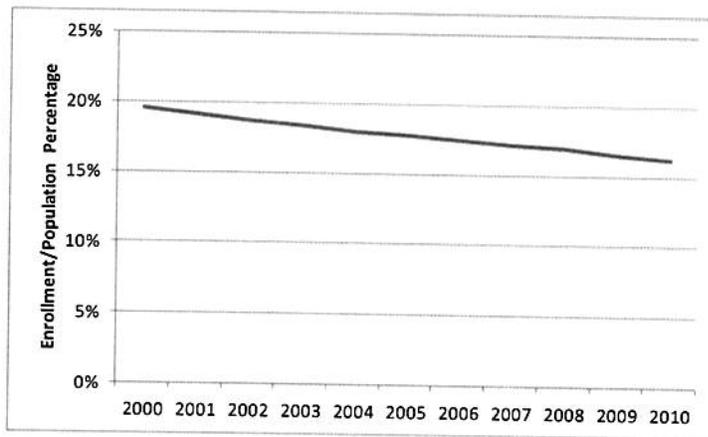
Figure B displays the current ratio of public school enrollments to resident population for all Nevada counties and the state as a whole in 2010. Across the state, the average ratio was 16.2%.

**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

<i>Name of Tribe or Other Group</i>	<i>Date of Contact</i>	<i>Follow-Up Contact</i>
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>



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

DEC 01 2009

**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>



FEB 02 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

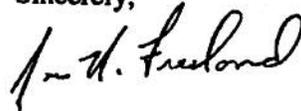
Dear Chairman Millet:

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 25<sup>th</sup>, 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,

A handwritten signature in black ink, appearing to read "G. M. Smith". The signature is written in a cursive style with a large initial "G" and a long, sweeping underline.

Gerald M. Smith  
District Manager

Attachments:

Cc: Annette George Harris  
Maurice Frank Churchill

Gdixon:GD1/28/09



# United States Department of the Interior

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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](mailto:bmfoweb@nv.blm.gov)



TAKE PRIDE  
IN AMERICA

*B. Seidling*  
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  
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(775) 635-4000 or [bmfoweb@nv.blm.gov](mailto:bmfoweb@nv.blm.gov)



TAKE PRIDE  
IN AMERICA

*S. Seidley*  
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

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Battle Mountain, NV 89820  
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(775) 635-4000 or [bmfoweb@nv.blm.gov](mailto:bmfoweb@nv.blm.gov)

**MAR 21 2008**



TAKE PRIDE  
IN AMERICA

*D. Sullivan*  
3/21/08

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

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50 Bastian Road  
Battle Mountain, NV 89820  
<http://www.nv.blm.gov/battlemountain>  
(775) 635-4000 or [bmfoweb@nv.blm.gov](mailto:bmfoweb@nv.blm.gov)



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3809/1790 (NV063)  
NVN-082096  
NV063-EIS07-019

MAR 21 2008

**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



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

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Battle Mountain, Nevada 89820  
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**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

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## **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 Name	Common Name	FWS Status	NV Status	Global Status	State Status	NV Range	Districts Contain	BLM Criteria	New to 2011 BLM List
<b>Amphibians</b>									
<i>Bufo nelsoni</i>	Amargosa Toad			G1G2	S1S2	YR	B	1,2	N
<b>Birds</b>									
<i>Rana luteiventris</i>	Columbia spotted frog (including Toiyabe spotted frog subpopulation)	candidate		G4T2T3Q	S2S3	YR	B	1,2	Y
<i>Accipiter gentilis</i>	northern goshawk		SS	G5	S2	Breeding	B	1	N
<i>Buteo swainsoni</i>	Swainson's hawk			G5	S2B	all	B	1	N
<i>Centrocercus urophasianus</i>	Greater Sage-grouse	CS	game bird	G4	S3S4	YR	B	1	N
<i>Charadrius alexandrinus nivosus</i>	Western snowy plover	T		G4T3	S3b	Breeding	B	1,2	N
<i>Leucosticte atrata</i>	Black Rosy-finch			G4	S3	YR	B	2	N
<i>Melanerpes lewis</i>	Lewis woodpecker			G4	S3	YR	B	1	N
<i>Oreoscoptes montanus</i>	Sage Thrasher		SS	G5	S5B	S	B	1	N
<b>Fish</b>									
<i>Crenichthys nevadae</i>	Railroad Valley Springfish	T	SE	G2	S2	YR	B	1	Y
<i>Gila bicolor ssp. 5</i>	Hot Creek Valley tui chub		SS	G4T1Q	S1	YR	B	2	Y
<i>Gila bicolor ssp. 7</i>	Railroad Valley tui chub		SS	G4T1Q	S1	YR	B	2	Y
<i>Gila bicolor ssp. 4</i>	Fish Lake Valley tui chub		SS	G4T1Q	S1	YR	B	1,2	N
<i>Rhinichthys osculus ssp 5</i>	Monitor Valley speckled dace		SS	G5T1	S1	YR	B	2	N
<b>Mammals</b>									
<i>Euderma maculatum</i>	spotted bat		ST	G5	S2	YR	B	1,2	N
<i>Lasius blashevillii</i>	western red bat		SS	G5	S1	YR	B	2	N
<i>Myotis californicus</i>	California myotis			G5	S4	YR	B	2	N
<i>Myotis lucifugus</i>	little brown myotis			G5	S7	YR	B	2	N
<i>Brachylagus idahoensis</i>	pygmy rabbit	petitioned	game	G4	S3	YR	B	1	Y
<i>Microdipodops pallidus</i>	pale kangaroo mouse		SP	G3	S2	YR	B	1	Y
<i>Thomomys bottae abstrusus</i>	Fish Spring pocket gopher			not current		YR	B	2	N
<i>Thomomys bottae curatus</i>	San Antonio pocket gopher			not current		YR	B	2	N
<i>Ochotona princeps</i>	pika		SP	G5	S2	YR	B	1,2	Y
<b>Reptiles</b>									
<i>Aegialia crescenta</i>	Crescent Dunes aegialian scarab	petitioned 2010		G1	S1	YR	B	1,2	N
<i>Aegialia knighti</i>	aegialian scarab beetle	petitioned 2010		G1	S1	YR	B	1,2	N
<b>Insects</b>									
<i>Aphodius sp. 2</i>	Crescent Dunes aphodius scarab	petitioned 2010		G1Q	S1	YR	B	1,2	N
<i>Cerylonis oetus albatorum</i>	Big Smoky wood nymph			G5T1	S1	YR	B	2	N
<i>Cerylonis pegala pluvialis</i>	White River wood nymph			G5T2	S2	YR	B	2	N
<i>Hesperia miriamae longaevicola</i>	White Mountains skipper			G2G3T1T2	S1	YR	B	2	N
<i>Hesperia uncas juhvapalla</i>	Railroad Valley skipper	petitioned 2010		G5T1	S1	YR	B	1,2	N
<i>Hesperia uncas grandiosa</i>	White River Valley skipper	petitioned 2010		G5T1	S1	YR	B	1,2	N
<i>Philotiella speciosa septentrionalis</i>	Great Basin small blue			G3G4T1	S1	YR	B	2	N
<i>Serica ammoneisica</i>	Crescent Dunes serican scarab	petitioned 2010		G1	S1	YR	B	1,2	N
<i>Serica psammoburum</i>	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 Name	Common Name	FWS Status	NV Status	Global Status	State Status	NV Range	Districts Contain	BLM Criteria	New to 2011 BLM List
<b>Molluscs</b>									
<i>Pyrgulopsis anatina</i>	Southern duckwater pyrg			G1	S1	YR	B	2	N
<i>Pyrgulopsis basiglans</i>	large-gland Carico pyrg	petitioned 2009		G1	S1	YR	B	2	N
<i>Pyrgulopsis carinata</i>	carinate Duckwater pyrg			G1	S1	YR	B	2	N
<i>Pyrgulopsis diensis</i>	Dixie Valley pyrg			G1	S1	YR	B	2	N
<i>Pyrgulopsis micrococtus</i>	Oasis Valley pyrg			G1	S1	YR	B	2	N
<i>Pyrgulopsis wongi</i>	Wongs pyrg			G1	S1	YR	B	1,2	N
<b>Plants</b>									
<i>Asclepias eastwoodiana</i>	Eastwood milkweed	Species of Concern		G2Q	S2	Y	B	2	N
<i>Astragalus cimae</i> var. <i>cimae</i>	Cima milkvetch			G2	S2	Y	B	1	Y
<i>Astragalus pseudodontus</i>	Tonopah milkvetch			G2Q	S2	Y	B	1,2	Y
<i>Astragalus toquimanus</i>	Toquima milkvetch			G2	S2	Y	B	1	Y
<i>Astragalus uncialis</i>	Currant milkvetch	Species of Concern		G2	S1	Y	B	1	N
<i>Boechnera falicfructa</i>	Elko rockcress	Species of Concern		G1G2	S1S2	Y	B	1,2	Y
<i>Castilleja salsuginosa</i>	Monte Neva paintbrush		CE	G1Q	S1	Y	B	1,2	Y
<i>Cardylanthus tecopensis</i>	Tecopa birdbeak	Species of Concern		G2	S2	Y	B	1,2	N
<i>Cymopterus goodrichii</i>	Goodrich biscuitroot	Species of Concern		G1	S1	Y	B	1	N
<i>Epilobium nevadense</i>	Nevada willowherb	Species of Concern		G2	S2	Y	B	1	N
<i>Eriogonum onemophilum</i>	Windloving buckwheat	Species of Concern		G2G3	S2S3	Y	B	1	N
<i>Eriogonum beatleyae</i>	Beatley buckwheat	Species of Concern		G2Q	S2	Y	B	1	Y
<i>Eriogonum tiehmi</i>	Tiehm buckwheat	Species of Concern		G1	S1	Y	B	1,2	N
<i>Grusonia pulchella</i>	Sand cholla			G4	S2S3	Y	B	2	Y
<i>Johanneshowellia crateriorum</i>	Lunar Crater buckwheat			G1	S1	Y	B	2	Y
<i>Lupinus holmgrenianus</i>	Holmgren lupine			G2G3	S2	Y	B	2	Y
<i>Parthenium ligulatum</i>	Low feverfew			G3	S1	Y	B	1	N
<i>Penstemon pahutensis</i>	Pahute Mesa beardtongue	Species of Concern		G3	S3	Y	B	1	N
<i>Penstemon palmeri</i> var. <i>macranthus</i>	Lahontan beardtongue			G4G5T2	S2?	Y	B	1	N
<i>Penstemon pudicus</i>	Bashful beardtongue	Species of Concern		G1	S1	Y	B	1	N
<i>Penstemon tiehmi</i>	Tiehm beardtongue			G1	S1	Y	B	1	N
<i>Phacelia filice</i>	Clarke phacelia			G2	S2	Y	B	1	N
<i>Polycnemium williamsiae</i>	Williams combleaf	Former candidate	CE	G2Q	S2	Y	B	1,2	Y
<i>Sclerocactus blainei</i>	Blaine pincushion	Species of Concern	CY	G1G2Q	S1	Y	B	1	N
<i>Sclerocactus nyensis</i>	Tonopah pincushion		CY	G1Q	S1	Y	B	1	N
<i>Sphaeralcea caespitosa</i> var. <i>williamsiae</i>	Railroad Valley globemallow			G2T2	S2	Y	B	1	N
<i>Tonestus groniticus</i>	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](mailto: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 of creating 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 aspects 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 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.

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 foreign 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 your consideration.

**Disposition:** Comment acknowledged; does not provide new information

## **Response**

CC-001-General Support

## **Letter 49**

### **Comment 1**

I strongly 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 and 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 we 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 Government 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 discovered and proved the orebody at Mt. Hope, and know that it can be mined completely in harmony 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