

American as apple pie, and a vital part of this nation's strength in the world. Here at Corrosion Engineering, we depend upon a good supply of moly for our day to day manufacturing of rubber and related products. We ship to mining and aggregate operations around the world, offsetting a portion of our national trade deficit. I strongly urge you to approve the project without further delay and to allow the project to move forward post haste.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 247

Comment 1

I am a Nevada Resident and Employee of Aggreko LLC. I am also a member of the Nevada Mining Association. With the highest unemployment rate in this country and being a Nevada resident for many years, We are not only concerned about our State but also the welfare of our people and land. I have had extensive dealings with mining companies in the State of Nevada and can say in most cases they leave the land better than they found it. Mining is a large part of what will and does create jobs in this State. To see the reclamation efforts and attention to environmental impact that companies such as General Moly as well as Barrick and Newmont have had. It is my opinion that we are much better as citizens and communities to let these companies run these projects. I am in favor of the Mt. Hope mining Project, not only from and Environmental impact perspective but also a Financial one for the state and federal levels. Please consider this email as support not only for this project, but also for Mining in Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 248 (FORM – F1)

Comment 1

I support General Moly's plan for developing the molybdenum mine at Mt Hope Officially called the Proposed Action, this plan protects our environment and wa-ter resources and brings greatly-needed, good-paying jobs to Nevada.

This mine will:

- Provide family wage mining jobs to the area for the next 40+ years
- Protect the surrounding environment
- Provide much-needed molybdenum to the worldwide steel industry

Support American jobs. Please move forward with the Mt. Hope Mine

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 249 (F1) through Letter 253 (F1)

See Letter 248 for form letter text and response.

Letter 254

Comment 1

I am very concerned that the Mt Hope Project will result in degraded quality of air for residents of southern Eureka County. The DEIS on page 3-276 states, "The potential for indirect fugitive dust emissions from the ground water production exists as a result of the Proposed Action

Should the water table be lowered a sufficient distance, the current vegetation community in this area may shift to another community, have a lower population density (less individual plants per given area), or there may be an area without any vegetation. Should this occur and there are sufficient activities in that area to keep the soil surface from crusting, then the wind would result in the creation of wind-blown fugitive dust. These emissions would have an incremental impact on the air quality in the vicinity a/the Kobeh Valley." The DEIS acknowledges the likelihood of wind-blown fugitive dust from the die-off of phreatophytes, but provides no evidence for the conclusion (shown above in italics) that it will have only an incremental impact on air quality "in the vicinity of Kobeh Valley."

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 254, Comment 2

BLM should require monitoring of fugitive dust. The mine's dust control plan which only cover the mine's footprint and roads, is inadequate because it does not deal with dust resulting from die-off of phreatophytes, which is also caused by the project.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020- Impacts to Phreatophytes

Letter 254, Comment 3

Agriculture is a sustaining foundation of Eureka County's economy. I am concerned that fugitive dust generated by the plant die-off will jeopardize the high quality of agricultural products and adversely affect productive agriculture in southern Eureka County. Page 3-368 acknowledges that, "The Project mining activities and vehicular traffic would affect vegetation within the immediate vicinity of the Project Area by increasing the amount of airborne particulate deposition onto vegetation surfaces. Deposition could result in lowered primary production in plants due to reduced photosynthesis and decreased water-use efficiency." The paragraph also asserts that the wind will blow the dust off the plants, limiting the impact, and finds that the significance criteria is not exceeded. There are farms and ranches immediately downwind of the Project Area that produce high quality hay and alfalfa for their livelihood. This analysis is insufficient in disclosing the potential impacts on these agricultural products, and in concluding that the significance criteria have not been exceeded. "Periodic short-term reductions in primary production" is very significant for farmers near the Project Area.

Disposition: Already addressed in planning documents

Response

CC-112-Potential Impacts to Air Quality

Letter 254, Comment 4

BLM's cumulative impacts analysis is too narrow. There are a dozen proposed mining projects within an approximate 50 mile vicinity of the Mt. Hope project and the Town of Eureka. What is the predicted cumulative effect on air quality of those projects combined with this one?

Disposition: Other (SEE RESPONSE)

Response

CC-130- Cumulative Effects Analysis

Letter 254, Comment 5

Eureka's many assets include clear air and pristine night skies. I do not want this project to degrade our air quality. It is essential that BLM ensure that the air quality of southern Eureka County is protected and that the DEIS discloses all air quality impacts as defined by federal standards and regulations.

Disposition: Already addressed in planning documents

Response

CC-112-Potential Impacts to Air Quality

Letter 254, Comment 6

The long term future of Eureka County depends on clean air, safe drinking water, and a healthy environment. Through permit conditions and its Record of Decision, I urge BIM to take all steps possible to protect Eureka's clean and healthy air for present and future generations.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 255

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in

the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 256

Comment 1

This is Sue Orr. I just think Mount Hope is a good thing and they need to let it go through. There's plenty of water in Nevada, no sense fighting over it. Seriously. Just not above ground, that's the only thing. And if their aquifer is separate from the one that's running the farms, I say go for it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 257

Comment 1

I write in support of the proposed mine at Mt. Hope and urge the BLM to issue a favorable record of decision with respect to this project as soon as possible.

My reasoning is simple. First, Eureka needs jobs and needs a positive economic influx badly -- businesses are closing there. This mine will pay much needed taxes, will be run in a responsible manner by a highly experienced and professional team of mining engineers and executives, and will increase the pool of well paid and desperately needed jobs. In short, this mine will work a social good where such things are lacking.

Second, the environmental impact of this project has been intensely studied by dedicated and experienced government people and contractors for years. Detailed studies have been compiled, collated, and completed. These public servants have put this project to and through exhaustive testing and analysis. Indeed, even Eureka County was a cooperating agency on the review of this project. This is a "zero discharge" project with extensive mitigation procedures in place. It is time to trust the BLM scientists and to trust that their work of many years was properly performed.

This town and county need this business. This business has been extensively vetted by BLM experts. Approving this project is the right thing to do, both for the people of Eureka and for the people who devoted so much time to making sure it was done right.

Therefore, I urge the BLM to issue a favorable record of decision so that this carefully planned and vetted project can begin to confer the economic benefits the town of Eureka and the State of Nevada so badly need.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 258

Comment 1

It has come to my attention that we are in the "public comment period" on the Moly Corp Project. As a business man that supplies equipment to such projects as this, I find it hard to believe that an important, impactful project like this has taken so long to receive their permits in this unbelievably tough economic time.

I'm sure the BLM is looking closely @ the impact to the environment on such a project, which they should, but again, such a project would not impact the area in any way more than all the current mines in the area that are already in production. In fact, with the regulation becoming more protective all the time, the impact should be less. Let's face it, where this project is being proposed is not an area with any great beauty and is well suited for such a project.

During the last 3 1/2 years, the federal government has been paying great sums of money to stimulate the economy and put people to work. Here is a project that will provide great economic stimulus and provide many new high paying jobs for years to come, and the great thing is, the economic stimulation will not cost current tax payers and further generations. Doing the opposite by providing taxes paid into the federal, state & local governments.

If there were more companies willing to invest in America in this manor, we would not be in the mess we are in today as a country. This is a "no brainer" and may I, as a tax payer, encourage the BLM to quickly move forward with the final permit necessary to allow this project to start this year.

Thank you for your consideration.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 259 (F1) through Letter 262 (F1)

See Letter 248 for form letter text and response.

Letter 263

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

The Mount Hope mine will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 264

Comment 1

Thank you for the opportunity to submit a comment regarding the DEIS for General Moly's Mt Hope mine. I strongly support the preferred alternative and the 400 jobs this project will create.

General Moly's Mount Hope Project will create much-needed jobs and generate a much needed resource-and it is doing so while being sensitive to the environment and the needs of those who live and work in Eureka County. In fact, General Moly has worked closely with the county to assure that the mine operates efficiently and in good stewardship of land and water resources.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 265

Comment 1

I have read the draft EIS and find the lack of current information on the traffic loads for highway 278 to be a problem. The numbers they cited are grossly below the actual traffic numbers that the highway currently has. They used reports from 2004 and since the increase in the price of gold last year the amount of vehicles for either mining, drilling, or contracting use on the highway as tripled.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 265, Comment 2

The effects of adding additional vehicles should be reconsidered with new numbers from the Department of Transportation and new accident statistics from the Highway Patrol.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 265, Comment 3

In Pine Valley there are a number of bus stops, slow moving vehicles, and use by ranchers to move cattle, that were not addressed as issues for traffic.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 265, Comment 4

There should be governors set on all the haul trucks at 65 mph to help deter speeding and resulting accidents.

Disposition: Other (SEE RESPONSE)

Response

The BLM does not have the authority to regulate vehicles using public roads.

Letter 265, Comment 5

Also highway 278 can be prone to deep drifting snow, heavy flooding rains, and wildfires those issues were not addressed.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 265, Comment 6

Also the number of mule deer killed on the highway is relatively high and a report from the Department of Wildlife should be attained and taken into consideration.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-068-Traffic Impacts

Letter 265, Comment 7

There are fifty seven residents that call Pine Valley home and highway 278 passes within feet of several of the dwellings, corrals, and fields. This road has become dangerous with all the haul trucks currently hauling ore from Ruby Hill, drillers from new mine sites and

oil exploration, and contractors that serve the mines; I am concerned that the draft EIS did not research enough of how adding more haul trucks and other vehicles will negatively affect this community.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-069-Mitigation for Impacts to Highways

Letter 265, Comment 8

The volunteer fire department has responded to over eight vehicle accidents in 2011. A huge increase from previous years and all but one were "mining" related. There should be more solutions addressed in the draft EIS besides running buses.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-069-Mitigation for Impacts to Highways

Letter 265, Comment 9

In closing I hope these concerns will be reviewed and addressed in the final EIS statement before it is approved.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 266

Comment 1

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

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 267 (F1) through Letter 272 (F1)

See Letter 248 for form letter text and response.

Letter 273

Comment 1

Provide a diversity mining in northern Nevada now dependent on Gold

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 274 (F1), Letter 275 (F1)

See Letter 248 for form letter text and response.

Letter 276

Comment 1

As a supplier of products and services to the mining industry, Gem State Paper & Supply Company is extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, we understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and bring the Silver State much needed economic development.

Unfortunately, we have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka county Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what we understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 277

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 278

Comment 1

I'm writing in support of General Moly's molybdenum mine in central Nevada. I recommend you approve the mine and move forward with the preferred alternative, which will create jobs and economic benefit for a wide region.

I especially appreciate the fact you did not select Alternative 2.2.4, the so-called "Go Slow" option. While I understand why you analyzed it, this Alternative is a classic example of something that may sound good, but won't work in the real world. Even if it did

work economically (which is highly doubtful) "water consumption on a per-unit basis would be higher than in the Proposed Action." That's reason enough to go with your recommendation.

We hear a lot about the 'boom and bust' of mining, but the reality of the Mount Hope Project is that a miner could go to work on construction next year and have a job for 45 years, or even 50 years if he/she worked on post-closure reclamation. Many of us would love to have the opportunity to spend our entire career in one place. That's one more reason to open the mine.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 279

Comment 1

I am sending you this note to tell you that I completely support the Mount Hope Project. Please see the following reasons:

1. Jobs. This will create needed jobs in Nevada. Not only will there be jobs at the mine but it will create other jobs for support business.
2. Mining. Nevada is typically a precious metals mining state. With the addition of Moly, it will help us diversify our economy.
3. Use of federal land. The good use of federal land is imperative. This would be very good use of our federal lands.

Please make every effort to help General Moly get to production as quickly as possible.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 280

Comment 1

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

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 281

Comment 1

There's no time like the present to approve the BLMs proposed alternative as it relates to the mine at Mount Hope. We need the economic boost this mine will provide and the steel industry needs American molybdenum.

General Moly's DEIS is thorough and deserves approval. We need to do everything we can to strengthen and grow the economy of Nevada and the west in general. This proposed mine will do just that.

When it comes to approving the Mt. Hope mine, I think the main thing to consider is what it will do for our suffering economy. General Moly plans to employ around 400 people in good-paying jobs and this will have a real impact on the surrounding community and the country as a whole.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 282

Comment 1

I recommend you approve the Mount Hope mine, and that it be approved as soon as possible. The preferred alternative clearly outlines a plan that works for the benefit of mining and conservation in Nevada and that will extract a commodity that is in demand by the worldwide steel market.

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 283

Comment 1

As someone who treasures the natural beauty of the American west, I ask that the preferred alternative for the Mount Hope mine proposal be approved. The planning behind this project is thorough and careful and will do much for utilizing our natural resources without compromising the environment.

When faced with a poor economic outlook, one must look for ways to improve the situation. General Moly's proposed mine at Mount Hope offers just such a solution and deserves approval.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 284

Comment 1

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

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

Any time a major company has taken the time and invested the money that General Moly has to ensure that it's proposed mine at Mount Hope is environmentally-sound and eco-friendly, I say, "Let them begin." This project puts people to work and just makes sense.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 285

Comment 1

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

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 286

Comment 1

As a company, Wedco would like to express its support for the General Moly Mt. Hope project near Eureka, Nevada.

We are a 60+ year old electrical wholesaler with five branches in northern Nevada. We employ approximately 55 people, and a significant portion of our business is derived from servicing the mining industry.

After reading the Draft Environmental Impact Statement that covers the Mount Hope project, we believe that General Moly, the owner of the project, will prove to be a responsible operator. They are an American company and will provide jobs here at home. The jobs that will be created in what has been primarily an agricultural county will establish a wider economic base. The construction phase of the mine will stimulate commerce across the area by providing opportunities for suppliers like us and other members of the Nevada business community. Continuing mining and milling operations will result in ongoing business for years to come.

Thank you for your consideration, and we look forward to the approval of this significant prospect for economic growth in northern Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 287

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 288

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 289

Comment 1

Please move forward with Bureau of Land Management's Preferred Alternative as detailed in Chapter 2 of the Draft Environmental Impact Statement.

I particularly like the mitigation plan, which includes protection of water and air quality. It also includes reclamation so the land is returned to a productive post-mining condition. So the project will provide jobs for generations and, the land will be able to be used for generations after that. Sounds like a win-win. Mount Hope should be approved because of these positive benefits.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 290

Comment 1

Thank you for taking the time to read my comments regarding approval of the Preferred Alternative for the proposed molybdenum mine at Mount Hope.

There are many good reasons to support this mine and I hope it will be approved as soon as possible.

I can't think of one good reason why this mine shouldn't move forward. I hope my comments will be considered and added to those of others asking for approval of this great project.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will

either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 291

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.

The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

We hear a lot about the 'boom and bust' of mining, but the reality of the Mount Hope Project is that a miner could go to work on construction next year and have a job for 45 years, or even 50 years if he/she worked on post-closure reclamation. Many of us would love to have the opportunity to spend our entire career in one place. That's one more reason to open the mine.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 292

Comment 1

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

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.

Our country is in a critically important place economically and I believe that what we accomplish over the next several years will either help or hinder our economic recovery. Without a doubt this proposal and the preferred alternative will help our recovery.

Any time a major company has taken the time and invested the money that General Moly has to ensure that it's proposed mine at Mount Hope is environmentally-sound and eco-friendly, I say, "Let them begin." This project puts people to work and just makes sense.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 293

Comment 1

I am writing in support of the Mount Hope Project. I believe this project can bring much needed jobs and infrastructure to Nevada in general and eastern and central Nevada in particular. This project has been well-thought out and the potential impacts identified and analyzed. General Moly, Inc. has demonstrated their commitment to the community as well as the environment.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 294

Comment 1

My name is William Assenmacher and I am the President, CEO, and owner of CAID Industries, a Tucson, Arizona company founded in 1947. CAID Industries is a metal manufacturing firm that does work for the mining industry and employs 235 people. We support Mount Hope Project for many reasons:

- Nevada is a nationally and internationally significant source of metals and minerals. Despite its long history of mining, Nevada still possesses considerable mineral reserves and its untapped geologic potential continues to make the state one of the most prospective mineral provinces in the world. Nevada's total production value is \$6.26 billion (second largest in the nation after Arizona). The Mt Hope project will improve the U.S. trade balance and produce strategic minerals, which support renewable energy. The Mount Hope Project contains approximately 1.3 billion pounds of proven and probable molybdenum reserves. The project will produce 8% of the global molybdenum supply.
- The Mt Hope Mine Project is a large and exciting economic opportunity for Eureka County as well as the economic development and diversification of northern Nevada. Growth industries are vital to the future of this economy. The project will spur the development of new infrastructure, facilitate new business opportunities, and bring in new tax revenues. Mt Hope will provide millions of dollars in county, state, and national taxes, with the total expected to exceed \$1.3 billion. The project will reduce the national trade deficit by about \$600 million per year and create value for U.S. investors.
- Nevada currently has the highest unemployment rate in the country. This project will create 400 permanent jobs. The mine life of 44 years provides socio-economic stability and a long-term revenue stream. We need to make use of the resources we have available in the U.S. to help our economy and long term jobs!

It's time for us to get behind this project and realize the benefits. Rather than sitting by and watching more jobs go overseas, let's take advantage of our natural resources!

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 295 (F1) through Letter 306 (F1)

See Letter 248 for form letter text and response.

Letter 307

Comment 1

It's with great enthusiasm that I write today in support of mining at Mount Hope. I urge approval of the preferred alternative that will get General Moly's Mt Hope mine off the ground and under construction. The country and the state need the jobs this mine will provide.

The United States has the natural resources that can help pull us out of our current economic depression. With abundant stores of molybdenum, General Moly's proposed Mount Hope mine is an example of such a resource that should be put to use in this cause.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 308

Comment 1

This is to express my support for the Mt. Hope and Liberty moly projects. The mines will provide important industrial minerals for our country, and for export. In reviewing the size and location of the projects, they will also provide a multitude of good paying, long-duration jobs for those residents seeking work, and acknowledge that there will likely be growth to the area, supporting local businesses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 309

Comment 1

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

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 310

Comment 1

The mining industry has supported northern Nevada for decades and with projects like Mt Hope will continue to do so in an environmental sound manner. Projects like Mt. Hope are important both to the economic viability of northern Nevada, and Nevada in general. These projects also assist the US in maintaining a domestic supply of minerals for industrial purposes. I urge the BLM to approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

The DEIS to evaluate General Moly's proposed Mount Hope mine is extremely thorough and demonstrates sound analysis of the impacts to the environment. This plan will be a positive economic stimulus for local businesses and other retail businesses. As an outdoor enthusiast and former Nevadan, I urge you to approve this project. I have seen great examples of other mining companies' commitments to be stewards of the environment. Reclamation at Mt Hope will meet all applicable. This is a great way to meet outdoor objectives and allow this economically important project to proceed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 311

Comment 1

The purpose of this communication is respond to the request made by the BLM for feedback on the Mount Hope Draft EIS. I had questions as to the reason there was a difference in the percentage of school-aged children in the projected number of students as compared to the current percentage of students to the population of Eureka County. I spoke with the person who did the projections and I was satisfied with his procedure and calculations. Given that resolution, I am satisfied that the EIS is as accurate as can be, given the time frame (44 years) and the availability of a workforce.

I would like to make an additional comment:

When the people from the Molly Mine came to the school district to meet and introduce themselves, they asked what they could do for the District. I said start a scholarship fund and put lights on the football field. They did both. They started a scholarship foundation that is to grow to \$1,000,000, and started a project to install lights on the football field. We have lights on the football field. This was a community effort spearheaded by the Molly Mine staff. This effort has been enjoyed by the school and the members of the community.

Eureka is a small community with not very much available housing. The District had a number of teachers and staff retire, but did not leave the community so there was not housing available for the new hires. I approached the administration of the Molly Mine and

asked if they would allow the teachers and staff to rent housing from the Mine. They not only allowed the teachers and staff to rent from the Mine, they allowed the employees of the County to rent as well. These are only a few examples of how the Molly Mine staff have worked to help, and be a part of the Eureka community.

It is my opinion the employees of the Molly Mine have made a strong effort to work with, and be good community members. This is a project that will help rural Nevada for many years to come. They should be approved to proceed with this project. Should you have any questions or need further clarification of anything I have said please feel free to contact me personally (775) 237-5373.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 312

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 313

Comment 1

The us economy is in trouble and creating good jobs is the solution. I am the President of a company with business operations across Nevada and I firmly support the Mount Hope project.

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

The Mount Hope mine will do a great deal for the economic outlook of this country. Let's get Americans back to work!

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 314

Comment 1

The preferred alternative as outlined in the Bureau of Land Management's DEIS for the Mt. Hope mine should be approved immediately. Any American operation that puts people back to work should be supported in these tough economic times.

Specifically, in the Great State of Nevada where we continue to lead the nation in unemployment, bankruptcy, and home foreclosures. In my travels, as an outside salesman of heavy mining equipment and truck parts, it is obvious that revenue generated from the Mt. Hope mine will have an extensively POSITIVE ECONOMIC IMPACT on the entire State of Nevada.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 315

Comment 1

The Elko County Economic Diversification Authority (ECEDA) reviewed the Draft Environmental Impact Statement (DEIS) for the Mt. Hope project and submit this letter of support for the project. This letter addresses only section 3.17 of the DEIS as it pertains to Elko County and the Cities within the county.

ECEDA is responsible for economic diversification in Elko County and each of the four cities within the county; Carlin, Elko, Wells and West Wendover. Based on the DEIS, Carlin and Elko will benefit from the Mt. Hope project in several ways. Employees that choose to live in Carlin and Elko as well as temporary workers staying in hotels, motels and RV Parks will all contribute to the economy.

Carlin and Elko are currently experiencing a shortage of residential housing. However, by the time the Mt. Hope mine ramps up the housing demand will be resolved and no mitigation will be required. Carlin is currently negotiating with two developers to build multifamily and single family homes in Carlin. The proposed timeline for development would make additional housing available at about the time it would be needed for the Mt. Hope project. Elko is also in progress with several developers to provide additional multifamily and single family housing with one multifamily project of about 200 units underway at this time.

With the demand for skilled workers in the mining industry, ECEDA teamed with GBC and the Elko County School District to focus on providing permanent long term solutions to our workforce needs. The Dream it — Do it program will train students starting in high school and provide career pathways as well as certifications for our youth to pursue various careers with local mining companies. The program includes marketing so that students and parents are educated on the availability of careers in their community. GBC currently provides training to 100 students each semester for various jobs in mining. We plan to expand the courses available as well as increase the number of students receiving training.

The Mt. Hope project is a great diversification and addition for our mining support companies as well. Hundreds of companies have invested in Elko County and additional mining will provide sustainability and growth for these companies.

ECEDA sees the Mt. Hope project as a good addition, not only to housing and temporary lodging but also for retail. We also believe that the Mt. Hope project provides much needed diversification from our gold mines. Although still mining, it is a mineral and therefore driven by different factors than gold. We fully support the Mt. Hope project and believe that it provides a very beneficial economic impact not only to Elko County but to all of the Northeastern Mining Region. We also believe that the County, Carlin and Elko can meet the demand of the Mt. Hope project with no mitigating measures required.

This letter of support was approved by ECEDA's Board of Directors and Executive Committee at their February 22, 2012 meeting.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 316

Comment 1

Like the rest of the nation, Nevada is suffering economically. I wish to voice my support for the proposed mine at Mt Hope because I would like to see more projects like this be successful so that our economy can benefit.

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

Mining projects hold real potential for turning our dismal economy around.

People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been

carefully studied and evaluated and is known to be a source of abundant molybdenum reserves. This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 317

Comment 1

The BLM should speedily approve the preferred alternative outlined in the General Moly Draft Environmental Impact Statement.

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

Now is the time to mine and General Moly has a project that will have long-term positive impacts on the economy of Nevada. It has presented a solid study for its Mt Hope project and should be allowed to move forward without further delay.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 318 (F1) through Letter 326 (F1)

See Letter 248 for form letter text and response.

Letter 327

Comment 1

As a supplier of products and/or services to the mining industry, I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit our company, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

We would like to add our name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for our company, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 328

Comment 1

My parents own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time our family has learned a lot about the Mt Hope molybdenum mine.

As a future 2nd generation business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers. I have enjoyed doing business with General Molly during the past two years or so.

It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses. It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community. I know General Moly will make a positive contribution in Eureka on behalf of my generation for many years.

Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to Eureka County. All of these benefits will add up to a more stable local economy and as a future business owner and operator I would like to see this project move forward.

Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 329

Comment 1

My family and I own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time I have heard and learned a lot about the Mt Hope molybdenum mine.

I have had the opportunity to talk with people who oppose the mine based mainly on perceived negative water impacts to Diamond Valley and the concerns of the growers. I have talked with people supporting the mine. I have also attended County Commission meetings and General Moly's Town Hall meetings. I understand the fear of negative impacts to Diamond Valley, but also understand that there are measures in place that will force the mine to stop mining if water impacts become evident in Diamond Valley.

As a business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers.

It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses. It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community.

Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to Eureka County. All of these benefits will add up to a more stable local economy and as a local business owner and operator I would like to see this project move forward.

Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 330

Comment 1

My parents own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time our family has learned a lot about the Mt Hope molybdenum mine.

As a future 2nd generation business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers. I have enjoyed doing business with General Molly during the past two years or so.

It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses. It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community. I know General Moly will make a positive contribution in Eureka on behalf of my generation for many years.

Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to

Eureka County. All of these benefits will add up to a more stable local economy and as a future business owner and operator I would like to see this project move forward.

Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 331

Comment 1

My husband and I own and operate a restaurant and meat processing facility in Eureka. We located to Eureka more than three years ago and over time I have heard and learned a lot about the Mt Hope molybdenum mine.

I have had the opportunity to talk with people who oppose the mine based mainly on perceived negative water impacts to Diamond Valley and the concerns of the growers. I have talked with people supporting the mine.

As a business owner, I am in support of a new mine operating in our area. Obviously, it is beneficial to our business and other local businesses when there is a pool of new or additional customers. I have enjoyed doing business with General Molly during the past two years or so.

It benefits the community when a major operation, such as General Moly, invests in the area and more people locate to the Eureka area and construction outfits and mining vendors frequent local businesses. It will also be a gain when there are more jobs for locals and more business opportunities for all local businesses. Growth is important if we are to be a sustainable community. General Moly has done an excellent job in keeping the local business owners informed of project updates.

Mt Hope Mine is planning for a 44 year mine life. It will hire 400 people and it is a molybdenum mine which will add diversity to Eureka County. All of these benefits will add up to a more stable local economy and as a local business owner and operator I would like to see this project move forward.

Please add my support to General Moly's Mt Hope Mine and I encourage the BLM's preferred alternative, which is similar to General Moly's proposal.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 332 (F1) through Letter 335 (F1)

See Letter 248 for form letter text and response.

Letter 336

Comment 1

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

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 337

Comment 1

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

In today's economic climate, the importance of the addition of 400 family wage jobs should not be taken lightly. The project offers the environmental protection, good jobs, economic stimulus and production of molybdenum that we need. Please move forward with this plan as quickly as possible.

This EIS is finely crafted and deserving of approval. The progress this mine represents should not be hampered. It's time to get folks back to work!

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 338

Comment 1

Our economy, our Country and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

The BLM presents an excellent DEIS and I urge the permitting agencies to proceed promptly to a decision that allows General Moly to begin hiring and mining. Under this scenario jobs will come to Nevada and the local and regional economy will reap the benefits. Please do the right thing and make this project a reality.

Nevada needs jobs, our Country needs to compete with other Countries that will bury our economy if we tie ours up with red tape!

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 339

Comment 1

Thank you for the opportunity to contribute to the comment period for General Moly's Mount Hope DEIS. I support this project and hope to see it up and running as soon as possible.

Any time a major company has taken the time and invested the money that General Moly has to ensure that it's proposed mine at Mount Hope is environmentally-sound and eco-friendly, I say, "Let them begin." This project puts people to work and just makes sense.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 340

Comment 1

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

It would be a terrible waste to not tap into this resource, right here in the U.S.A. The fact that this mine will employ literally hundreds of people for 44 years is reason enough to proceed, and when you consider all the environmental safeguards and mitigation the company has agreed to, it's clear the BLM should approve the preferred alternative and issue a ROD.

I believe that any mining company that is working in today's environment is so much more environmentally conscious than the average "environmentalist"

It is ridiculous. These companies are under very heavy restrictions and only the companies that are doing it for the right reason are willing to risk the kind of money needed to start a new mine.

I attended an open comments meeting the U.S. Forest Service had about the Rosemont Mine in Southern Arizona and the best arguments that those against the mine had were that a desert tortoise was seen in the area (they are all over the Sonoran Desert) and that crack houses use metal so we should not mine metal any more.

The reasons for the mine were vast and included, jobs in a depressed area and economy, jobs in an area with double digit unemployment, jobs in an area with mostly service workers that get paid just above minimum wage. The stewardship of the environment and the community activism were also talked about. The sponsoring of baseball teams to local events.

All of this added up to a "NO BRAINER"

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 341

Comment 1

I'm writing in support of General Moly's molybdenum mine in central Nevada. I recommend you approve the mine and move forward with the preferred alternative, which will create jobs and economic benefit for a wide region.

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

The important thing is that the environmental impacts of the proposed mine at Mt Hope have been fully assessed by the BLM and that General Moly has been very concerned with conducting this project responsibly. Mining at Mt Hope is needed now to bring 400 good paying jobs to the area. I ask that you approve this plan in an expeditious manner.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 342

Comment 1

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

By tapping into our abundant natural resources here at home, our economic outlook could be vastly improved. As an American

company, run by American management and a majority of American shareholders, General Moly's Mount Hope project will contribute greatly to our economy.

So let's get moving as quickly as possible to make this project happen.

It's what's best for the environment, best for Nevada, and best of our economy and tax base.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 343

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 344

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 345

Comment 1

Americans urgently need jobs. The project at Mount Hope will provide them. Please approve the preferred alternative as proposed in the Draft Environmental Impact Statement and help get Americans back to work.

Strike while the iron is hot! The proposed mine at Mt. Hope is ready to begin employing people and the timing couldn't be better. The resources market is favorable and Americans need good-paying jobs. General Moly is prepared to provide for both.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 346

Comment 1

Our environment is important to our quality of life, but equally important is the ability to make a living. The proposed mine at Mt. Hope as outlined in the preferred alternative strikes the right balance between environmental stewardship and economic growth. It should receive approval and be allowed to move forward.

There might not be many who know what molybdenum is or what it is used for, but for those who do, this project holds the promise of long-term economic stability and prosperity to an area of the country that is sorely lacking in both.

Mining is a tough industry fraught with uncertainty. The Mount Hope project, however, offers all the economic benefits of a long-term mine without any of the uncertainty of certain types of mining. Molybdenum is needed by the steel industry and will be for the foreseeable future. Let's give it a boost by approving this EIS.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 347

Comment 1

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

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

Returning nearly 400 critically needed jobs to Nevada is paramount for the local, state, and national economy. I urge you to make a decision that allows General Moly to begin hiring and mining.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 348

Comment 1

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

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.

General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 349

Comment 1

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

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 350

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

Today, with the extreme recession facing our nation, the mining industry seems to offer a path to recovery. For this reason, I support the proposed General Moly mine at Mount Hope. It is ready to put Americans to work and produce the molybdenum demanded by the steel industry worldwide. If mining can provide a way to economic recovery, shouldn't we all support this project going forward?

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 351

Comment 1

Our economy and our families are suffering. We can do something about this by supporting the proposed mine at Mount Hope and approving the preferred alternative that will put people to work quickly and will keep them gainfully employed for years to come.

General Moly has done a great deal to assure that environmental protections are put in place for its proposed Mt Hope mine. It is an asset to the surrounding community and to the economic outlook of our nation as a whole. Please see that this project is allowed to proceed.

Mining is a tough industry fraught with uncertainty. The Mount Hope project, however, offers all the economic benefits of a long-term mine without any of the uncertainty of certain types of mining. Molybdenum is needed by the steel industry and will be for the foreseeable future. Let's give it a boost by approving this EIS.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 352

Comment 1

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

General Moly is creating American jobs and boosting the economy of the State of Nevada at a time when many around the nation are suffering from lack of work. Not only will General Moly's Mount Hope Project improve the economic well-being of the area immediately surrounding it, but will also do a great deal to improve our economic well-being nationally. This mine will reduce the national trade deficit by around \$600 million annually and generate \$50 million per year in Federal, State, and local taxes.

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 353

Comment 1

General Moly has proposed a molybdenum mine at Mt Hope that is both environmentally-sound and economically beneficial. I ask that you approve this project and the preferred alternative without delay.

General Moly has done a thorough study of the proposed molybdenum mine at Mt. Hope, including consideration for the surrounding environment and long-term outlook of the area. I am confident that in addition to improving the livelihood of the area immediately surrounding the mine, this project will do a great deal to boost the economy of Nevada and the rest of the country. We could use more projects like the one at Mt. Hope and I encourage its speedy approval.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 354

Comment 1

I fully support this project and the Preferred Alternative as outlined in the DEIS.

The study done to evaluate potential impacts from the project shows there won't be any significant impacts to Diamond Valley, which is the main competing use for water in the area. Over 5 years of studies have been done. It's time to make the decision and move forward.

Mt. Hope Mine is a major component to economic recovery in mining projects.

Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

Let approve the EIS and move forward and increase the economic welfare of Eureka County.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 355

Comment 1

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

The Draft EIS, including the mitigation discussed, outline how the Mount Hope Mine will have a minimal impact on the county's environment, which is very important. In addition, the project will create an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during the life of the mine, which is expected to be four decades. That's a huge shot in the arm for the regional economy, the local and state tax based, and most importantly, hundreds of families who will benefit. That's great news - if the proposed action is endorsed and the ROD is favorable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 356

Comment 1

The mining industry is one of the bright spots in an otherwise bleak economy. Please approve the molybdenum mine at Mt. Hope and support the preferred alternative to help get our economy moving again.

I have been observing the trends in the economy and believe a major component to economic recovery is mining projects. One such project proposed by General Moly, the Mount Hope mine, is ready to go and needs only to receive final approval before it can begin contributing to our economic recovery. Not only will the mine employ around 400 people, it has a lifespan of nearly 80 years, ensuring that American families will reap the benefits of this project for years to come.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.

It is a great time to open a mine. The markets are very favorable to mining the abundant natural resources we have here in the United States and General Moly's Mt. Hope project is a clear example of project that is ready to proceed in getting to our resources and putting folks to work. It should be approved and allowed to open as soon as possible.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 357

Comment 1

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

This project will create additional revenue for a state that, like many others, can really use the economic boost. It will employ 400 people and go a long way toward revitalizing central Nevada. Thank you for considering my comments and please approve the plan and make this molybdenum mine a reality.

So let's get moving as quickly as possible to make this project happen.
It's what's best for the environment, best for Nevada, and best of our economy and tax base.

The proposed mine at Mt Hope is a project that deserves full support and speedy implementation. Our economic outlook is bleak, but this mine offers real hope that we can turn at least a portion of the economy around.

General Moly should be allowed to proceed as soon as possible on developing a mine that has proven viability and a long life ahead of it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 358

Comment 1

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

The environmental impacts of the resumption of mining have been fully assessed in this DEIS. The positive impact that the opening of the Mt Hope mine will have on the state of Nevada and the country are significant and so I urge you to approve and move forward with this plan quickly.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 359

Comment 1

There are continuing concerns about the cumulative visual impacts to public lands users' experiences from certain activities (temporary and permanent). Some notable activities include proliferation of new roads, poorly-sited and designed structures, lack of co-location of infrastructure and improper lighting, to name a few.

Cumulative visual impacts to public lands users' experiences should be considered.

Disposition: Other (SEE RESPONSE)

Response

Chapter 4 of the DEIS discloses the potential cumulative impacts associated with the proposed Project. No changes to the text of the FEIS have been made to address this comment.

Letter 359, Comment 2

The following language is suggested that should be provided up front to applicants who propose development on public lands that includes lighting:

Utilize appropriate lighting:

- ♣ Utilize consistent lighting mitigation measures that follow "Dark Sky" lighting practices.
- ♣ Effective lighting should have screens that do not allow the bulb to shine up or out. All proposed lighting shall be located to avoid light pollution onto any adjacent lands as viewed from a distance. All lighting fixtures shall be hooded and shielded, face downward, located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas.
- ♣ A lighting plan should be submitted indicating the types of lighting and fixtures, the locations of fixtures, lumens of lighting, and the areas illuminated by the lighting plan.
- ♣ Any required FAA lighting is exempt from this condition, but should be consolidated and minimized wherever possible.

In addition, the following mitigation measures should be employed.

Utilize building materials, colors and site placement that are compatible with the natural environment:

- ♣ Utilize consistent mitigation measures that address logical placement of improvements and use of appropriate screening and structure colors. Existing utility corridors, roads and areas of disturbed land should be utilized wherever possible. Proliferation of new roads should be avoided.
- ♣ For example, the use of compatible paint colors on structures reduces the visual impacts of the built environment. Using screening, careful site placement, and cognitive use of earth-tone colors/materials that match the environment improve the user experience for others who might have different values than what is fostered by built environment activities.

♣ Federal agencies should require these mitigation measures as conditions of approval for all permanent and temporary applications
Disposition: Analysis modified (SEE RESPONSE)

Response

Although the requested lighting measures are applicable to many facilities and operations on public lands, mining safety dictates that some of these measures cannot be adopted. Lighting is essential in areas where employees are expected to be working. This includes the process and active mining areas, and by providing adequate light to protect worker safety, some light may be visible from adjacent lands. However, EML has reviewed the Project design and will accommodate the requested measures where possible. The following language has been added to the EIS in Section 2.1.14, "In the process, maintenance, warehouse, laboratory and administration areas, lighting will have screens to prevent the bulb from shining up or out, and would be located to avoid light shining onto adjacent lands as viewed from a distance. Within these areas lighting fixtures would be hooded and shielded, face downward, be located within soffits and directed on to the pertinent site only, and away from adjacent parcels or areas. Buildings would be painted in earthtones so they are compatible with the natural environment."

Letter 360

Comment 1

Choose the NO ACTION ALTERNATIVE

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 360, Comment 2

Do one foot and five foot water drawdown maps for this project

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 360, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving natural ecological balance

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 360, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 361

Comment 1

1) Choose the NO ACTION ALTERNATIVE

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 361, Comment 2

2) Do one foot and five foot water drawdown maps for this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 361, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 361, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "not natural predators"), less than a page long and did not specifically address wild horses in nearby areas.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 362

Comment 1

Please leave the mustangs alone, nature can manage itself.

Henry David Thoreau said: In wildness is the preservation of the world.

By removing the wild from the west, you destroy the west.

Your own Don Glenn stated with a slide show in Reno that the mustangs were impossible to count.

How can you have a management plan based on numbers that are impossible to count?

And as far as the mustangs having no natural enemies, ummm, don't we all?

Please let them just be, preserve our freedoms,

As America is meant to be

Disposition: Other (SEE RESPONSE)

Response

The comment is beyond the scope of this EIS.

Letter 363

Comment 1

There will be impacts on privately-held water rights that have been established for many years, such as Henderson Creek, Robert's Creek, Nickel Springs, and Diamond Valley, among others. My concern is that the proposed mitigation for Robert's Creek Spring and Henderson Creek Spring (page 3-97) is flawed. Specifically, the mitigation proposes to pipe a maximum of 9000 gpm to these two springs for 3 months. Where is the mine getting that water? In both of these in-stances the mitigation will take water that has not been accounted for in the DEIS. The mine's consumptive use will consume all the 11,300 acre feet per year ground-water under appropriation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 363, Comment 2

In addition, the water used for The Henderson Creek mitigation is pumped from Kobeh Valley, which would amount to an inter-basin transfer.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 363, Comment 3

The whole hydrological plan for the operation of this Mine depicted in this DEIS is based on an inter-basin transfer of water. The Kobeh Valley water is used beneficially in the facilities located in the Diamond Valley Hydrographic Basin to concentrate the ore.

Nevada Water Law says: In determining whether an application for an interbasin transfer of water should be approved or rejected, under NRS 533.370 the State Engineer must consider:

Whether the applicant has justified the need to import the water from another basin.

Whether a conservation plan has been adopted and is being effectively carried out, if the State Engineer determines that such a plan is advisable for the basin into which water is to be imported.

Whether the proposed action is environmentally sound as it relates to the basin from which the water is exported.

Whether the proposed action is an appropriate long-term use that will not unduly limit the future growth and development in the basin from which the water is exported.

Any other factor(s) the Office of the State Engineer determines to be relevant.

The applicant may also work with the county from which the water is proposed to be transferred to develop a plan to mitigate adverse economic impacts of the transfer. If a plan cannot be agreed to, the county (with the approval of the State Engineer) has the option to impose an annual fee on the water transferred. The amount of the fee is defined in NRS 533.438. None of these laws have been adhered to.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-021-Water Development Plan

Letter 363, Comment 4

Examples are as follows:

Pg 2-18 2.1.2.2 Mine Dewatering: ----- Approximately 20% of the pit dewatering water would come from Kobeh Valley and 80% of the pit dewatering would come from Diamond Valley, which is proportionally based on the configuration of the open pit relative to the basin divide and the local geology. This states that approximately 80% of the pit and the mining will take place within the Diamond Valley Hydrographic Basin boundary.

PG 3-41 Figure 3.2.10 Depicts the majority of the pit is in the Diamond Valley Hydrographic Basin.

Pg3-79 Figure 3.2.18 Depicts the majority of the pit lake drawdown is in the Diamond Valley Hydrographic Basin.

Pg 2.21 Figure 2.1.8 Depicts the location of the processing and milling facilities within the Diamond Valley Hydrographic Basin.

Pg 2-13 and, 2-14 Figure 2.1.5 and Figure 2.1.6 These two figures show that at some point in time that the non-PAG waste rock storage area will effectively change the division of the Hydrographic Basins, placing the mine completely within the drainage of the Diamond Valley Hydrographic Basin.

I Believe the Processing and Milling Facilities where the concentration of the ore takes place is the place of beneficial use of the water.

Pg 2-3 figure 2.1.5 Shows the location of the tailing storage facilities. The deposition of all remaining water will be trapped in the tailings, or evaporated into the air from the tailings. This disposal of water by isolation from the aquifer or evaporation is consumptive.

The fact that the water is in solution with the tailings and transferred back across the Hydrographic boundary is just a shell game. It is either isolated from the Kobeh Valley aquifer and trapped in the tailings or evaporated into the air.

The fact that the water does not return to any basin in my opinion is equivalent to a "Takings".

Disposition: Comment acknowledged; does not provide new information

Letter 363, Comment 5

The DEIS is flawed because it does not address any alternative action to the pumping from Kobeh Valley.

BLM NEPA Hand book (H-1790-1) The EIS must "rigorously explore and objectively evaluate all reasonable alternatives" (40 CFR 1502.14(a) and NEPA Sec. 102(2)(C)(iii) and "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources" (NEPA Sec. 102(2)(E)).

Disposition: Comment acknowledged; does not provide new information

Response

CC-029-Roberts Creek Recreation Data

Letter 363, Comment 6

BLM's National Policy Act Handbook states all "relevant, reasonable, mitigation measures that could improve the project are to be identified even if they are outside the jurisdiction of the agency"(BLM, 2008. H-1790-1)

Disposition: Other (SEE RESPONSE)

Response

The section of the BLM NEPA Handbook that is quoted is from the CEQ 40 Questions - Question 19b. The response to Question 19b further elaborates by stating "... outside the jurisdiction of the lead agency or the cooperating agencies, thus would not be committed as part of the RODs of these agencies. ... This will serve to ... alert agencies or officials who can implement these extra measures, and will encourage them to do so." This text implies that any mitigation measures outside the BLM's jurisdiction to be discussed in the EIS needs to be ones that another agency has the authority to implement. The text is not indicating all mitigation measures are to be discussed regardless of their implementability. Text has been added to Section 3.26 of the EIS that discusses those mitigation measures that outside of the BLM's jurisdiction, but may be implemented by other regulatory bodies. The NDWR has the ability to mitigate impacts to water rights. The text under Section 3.2.3.3 of the EIS discusses the NDWR jurisdiction for water rights.

Letter 363, Comment 7

I propose that there is an alternative to the Proposed Action that is not addressed in the DEIS. If this mine had chosen to purchase 22,600 acre-feet per year from private holders in Diamond Valley in return for pumping 11,300 af/yr. from the Diamond Valley Hydrographic Basin, it would have eliminated the vast majority of environmental impacts related to this project. The additional 11,300 af/yr. would help alleviate the current over-drafting of the entirety of The Diamond Valley Flow System. (Inset map on Figure 3.2.3 upper right corner)

The impacts, as currently described in the Proposed Action, will have to be addressed in an ongoing manner for hundreds of years.

Many major mining companies operating in Nevada have purchased private water for their projects proving that this alternative does not set a precedent.

I think history will show that we have missed the mark and lost a real opportunity to make a positive difference on the impact to the environment. We could reduce the impact on 150,000 acres of wildlife habitat, which includes all of the Robert's Mountain.

The vast majority of the impacts to springs seeps and wells, multiple hundreds of acres of riparian, and pasture lands associated with many historic, sustain-able ranching operations would not be impacted.

With cooperation from private enterprise, the mining interest, Federal, state, and local government, the one potentially renewable resource we have, WATER, would remain renewable so, even after the mineral deposits are depleted.

Disposition: Comment acknowledged; does not provide new information

Response

CC-071-Alternatives to Water Use

Letter 363, Comment 8

I believe that the state and the BLM Needs to quit treating the state's water as a finite resource. It is important to work to preserve a Renewable Water Supply for southern Eureka County. That to me is the most important issue surrounding this DEIS.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 364

Comment 1

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

Mining projects hold real potential for turning our dismal economy around.

People need and want to be put back to work and General Moly's proposed mine at Mount Hope can do this. The site has been carefully studied and evaluated and is known to be a source of abundant molybdenum reserves.

This molybdenum is prized in the steel industry for its role in making steel strong. It is in demand and this project can serve this demand. Why wouldn't someone support wise use of our natural resources and the American jobs it creates?

This plan will see that jobs are returned, the local and regional economy is stimulated, tax revenues are increased, and environmental protections are put in place. This is what Nevada and the nation needs in our present economy.

This is an excellent project that has been studied extensively and from every perspective. Just by way of example, consider that Appendix C, "Mitigation Summary Plan" alone is 52 pages, covers everything from Auditory to Wildlife - with a hefty section on Water in between. In turn, Attachment 4 to that Plan, which regards Townsend's Big-Eared Bats, itself has an Appendix 1 and an Appendix 2. Quite literally, the Appendices have Appendices. Let's put that good work - and good people - to work. Now.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 365

Comment 1

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

The Mount Hope project is ready to go and should be approved immediately.

General Moly has conducted all the necessary permitting and baseline studies and is capable of beginning construction upon receipt of the ROD.

This means that Nevadans could be put to work as soon as the end of 2012 and that the mine could be producing as early as 2014. The economic recovery of the United States depends on thoughtful projects like that at Mount Hope.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 366

Comment 1

I appreciate being able to comment on the Mount Hope mine proposal and wish to add my support to those who wish to see this mine open and operating as soon as possible.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 367

Comment 1

Broadbent & Associates, Inc. is submitting this letter to express our support for the proposed Mt. Hope project as outlined within the Draft Environmental Impact Statement (DEIS). In our opinion, throughout development of the DEIS, Eureka Moly is demonstrating responsible stewardship of the land. Additionally, we feel that the increased employment opportunities within Eureka County as a result of this project make it a worthwhile venture, especially when considering the responsible nature Eureka Moly has demonstrated in the DEIS.

With regard to groundwater quality, it has been our experience that the quality of water discharged from modern mining operations is far superior to that of historical mining operations. Regarding the Mt Hope project, it is our understanding that the proposed mine site will include open pit mining (and a future pit lake) and both non-acid generating and potentially acid generating waste rock piles.

However, based upon the DEIS, it is our opinion that concerns relative to these operational features are being adequately addressed so as to minimize potential impacts to current and future groundwater quality.

In summary and based upon our review of the proposed Mt. Hope Mine, it appears to us to be a worthwhile project, particularly when considering the care demonstrated by Eureka Moly in preparing the DEIS, the results of the study, and the overall economic benefit of the project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 368

Comment 1

Do you have the assurance the Molybdenum mine project for Mt. Hope has all its dollars and cents to complete the project? It would not enhance the landscape of southern Eureka County to have an open pit with no vegetation which was only partially backfilled. Remember they left the canyon north of Eureka (the town) torn up, and a mess was dumped on the taxpayers.

Disposition: Other (SEE RESPONSE)

Response

CC-117-Reclamation after Project Completion

Letter 368, Comment 2

3.9.3.4 states the No Action Alternative that the area would remain available for future mineral development, or for other purposes as approved by BLM. If that be the case, we need to think of an American Company, where American financial companies keep our resources here in the U. S. A. A foreign company, with foreign financing and our natural resources shipped, leaves us deplete of our natural resources only to cost us money to bring back much needed hardened metals for our own use.

Disposition: Other (SEE RESPONSE)

Response

Comment noted.

Letter 368, Comment 3

Another concern I have is that moly is essential for the proper development of plants. The paintbrush is about to be listed on the BLM SSS list and that is a plant that is prevalent in the Mt. Hope region. The BLM has the authority to protect all flora and fauna and to prevent undue degradation.

Disposition: Comment acknowledged; does not provide new information

Response

CC-070-Special Status Species Mitigation

Letter 368, Comment 4

Another concern is air quality. Anyone that has lived in southern Eureka County knows the prevailing winds are from west to east. With mining disruption to the west of us, what is that going to do for the air we breathe and for further dust on our crops?

Disposition: Already addressed in planning documents

Response

CC-112-Potential Impacts to Air Quality

Letter 368, Comment 5

Most of us won't be around in forty to fifty years, but it is our legacy to maintain and keep a safe environment for our children and our grandchildren. We hope to provide the same opportunities to farm and raise livestock that we have been afforded.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 369

Comment 1

Eureka was initially developed by mining in the 1800's, but has been sustained over the years by agriculture and its strong tax base. I am a fifth generation farmer/rancher in southern Eureka County. My family has always raised cattle and our hay crops initially were limited to irrigated hay meadows and our cattle watered on developed springs and creeks. Mt Hope certainly is a concern because at

one time we lived in Kobeh Valley, and we used the waters of Monitor, Antelope, and Kobeh Valley before we moved to Diamond Valley. We know that the drainage waters of those valleys flow toward Diamond Valley due to the elevation of those areas. Mount Hope claims that the water will be chiefly derived from Kobeh Valley and it will not affect Diamond Valley water. How can this be so if the drainage water goes toward and arrives in Diamond Valley?

Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 369, Comment 2

Air quality control is a concern. Without clean air to breathe, with dust churning through the air, what effect might this have on us personally and our livestock, as well? Since our crops are delivered around the world, what kinds of dust will the crops be carrying with them as they travel?

Disposition: Already addressed in planning documents

Response

CC-112-Potential Impacts to Air Quality

Letter 369, Comment 3

Mt. Hope talks about job creation. If our air quality in Diamond Valley is bad and there is no water for irrigation, that leaves more than four hundred employers and employees unemployed, sick from breathing dust and the people of the area may eventually be on food stamps. Our livelihood would be taken.

Disposition: Already addressed in planning documents

Response

CC-065-Socioeconomic Impacts from the Project

Letter 369, Comment 4

Mt. Hope is threatening the economic stability of a renowned agricultural area in southern Eureka County. It has sustained our county during the lean years because of its tax base. What of all the tax breaks that area mines get?

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 370

Comment 1

How many AUM's are going to be affected? What effect will it have into the future?

Disposition: Other (SEE RESPONSE)

Response

Section 3.13.3.3 of the EIS discloses the AUMs expected to be impacted from the Project.

Letter 370, Comment 2

Do you have the assurance the financial resources are in place for a full completion of the project, or are they going to leave a scarred mountain side and then vanish? That would create a dust hazard forever. After all, they left the canyon north of Eureka a mess.

Disposition: Other (SEE RESPONSE)

Response

CC-117-Reclamation after Project Completion

Letter 370, Comment 3

What about emissions and poor air quality? That would affect our personal ability to breathe along with covering our soils with heavy metals. This would not only affect Diamond Valley, but for a radius of many miles around.

Disposition: Already addressed in planning documents

Response

CC-112-Potential Impacts to Air Quality

Letter 370, Comment 4

Mt. Hope talks about the jobs they will create, but if it creates water and soil issues for all concerned that would leave four hundred or more people of Diamond Valley unemployed, penniless, and on food stamps. Please also remember that Diamond Valley agriculture also stimulates the economy and supports the food availability in the U. S.

Disposition: Already addressed in planning documents

Response

CC-065-Socioeconomic Impacts from the Project

Letter 370, Comment 5

With the entire disturbance it will destroy the Pony Express trail and certainly Pony Express is very historic.

Disposition: Other (SEE RESPONSE)

Response

As described in Chapter 2 of the EIS, the Pony Express Trail is avoided by essentially all the Project-related surface disturbing activities. See Section 2.1 of the EIS. No changes to the FEIS have been made to address this comment.

Letter 370, Comment 6

During the early 1900's many Indians lived in the Mount Hope area during their migrations from north to south and back again. I'm sure there are Indian artifacts in areas around Mount Hope.

Disposition: Other (SEE RESPONSE)

Response

The Project Area has been fully surveyed for cultural resources and those discovered resources are addressed in the EIS. No changes to the FEIS have been made to address this comment.

Letter 371 (F1) through Letter 383 (F1)

See Letter 248 for form letter text and response.

Letter 384

Comment 1

Because Diamond Valley is already over adjudicated in water rights and is also inclined to be of an arid climate, the Mt. Hope Project can, and will, have a negative impact on the water table in Diamond Valley and the farming industry in Diamond Valley. It also has the potential to have a negative impact on many of the springs surrounding Diamond Valley.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 384, Comment 2

The DEIS ignores the inconsistencies and conflicts with the plans, goals and policies outlined in Eureka County's Master Plan and does not address how these conflicts will be mitigated.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-025-Eureka County Plan Consistency

Letter 384, Comment 3

The DEIS has little information on the high environmental values, fisheries and recreational opportunities on the Roberts Mountain area including Roberts Creek.

Disposition: Comment acknowledged; does not provide new information

Response

CC-029-Roberts Creek Recreation Data

Letter 384, Comment 4

In the latest version of the DEIS, the BLM states that recreational opportunities in the Roberts Mountain area will be lost. This tells me that the water will be drying up due to the pumping of water for the Mt. Hope Project. The loss of these creeks, seeps and wet meadows will have a devastating effect on the fisheries, wildlife habitat and the candidate endangered species

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 384, Comment 5

It seems that there is a double standard here; it has been proposed by the BLM that the livestock operators in that area should move their cattle out during the hot season and that the meadows should be grazed no less than a six or eight inch stubble height in order to protect the Sage Grouse, yet the Mt. Hope Project will have extreme negative consequences to the Sage Grouse habitat and natural resources and the Sage Grouse will be long gone after the water dries up.

Disposition: Already addressed in planning documents

Response

Impacts to greater sage-grouse are addressed in Section 3.23.3 of the EIS. Mitigation for greater sage-grouse is incorporated into Section 3.23.3 and is outlined in Appendix D of the EIS. No change has been made to the EIS in response to this comment.

Letter 384, Comment 6

Although there are some mitigation measures suggested throughout the DEIS document, these mitigation measures do not come anywhere close to replacing the existing natural habitat that exists in the Roberts Mountain area and Roberts Creek.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-038-Roberts Creek Analysis and Mitigation

Letter 384, Comment 7

The DEIS tends to downplay the potential impacts on the surface water resources in general, and the decreed surface water rights in Henderson Creek even though these water rights are adjudicated under court decree and no reduction of flow caused by other ground water extractions is allowed under the decree.

Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 384, Comment 8

In conclusion, the Mt. Hope Project is a huge project and the economic benefits to the local businesses and Eureka County may also be huge. But, the farming industry, the existing environmental values, the existing natural resources, and existing prior rights should not be ignored despite the benefits.

Disposition: Already addressed in planning documents

Response

CC-067-Socioeconomic Impacts

Letter 385

Comment 1

I urge the BLM to take the NO ACTION ALTERNATIVE in connection with the Mount Hope Project as described in ES-2 to ES-3 in Volume 1 of the Mount Hope Project DEIS.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 385, Comment 2

In the 3 paragraphs (out of 2 huge volumes of data) that the BLM has allotted for the Purpose and Need for the Action of the Mount Hope Project, the DEIS states "The need for the action is established by the BLM's responsibilities under the FLPMA to respond to a request for a Plan of Operations for the applicant to exercise their rights under the General Mining Law."

Okay, you responded to the request. This doesn't mean you have the responsibility to approve the request. Also, responding to a request does not establish the "need" for this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-109-Purpose and Need

Letter 385, Comment 3

FLPMA (The Federal Land Policy and Management Act of 1976) policy directs that BLM manage our lands so they "best meet the present and future needs of the American people" and take into account "the long-term needs of future generations for renewable and non renewable resources..." In this DEIS the BLM does NOT establish the need for this action, which RENDERS MOOT all of the maps and analyses contained in this DEIS.

Disposition: Other (SEE RESPONSE)

Response

CC-111-FLPMA Compliance

Letter 385, Comment 4

FLPMA policy directs the use of land and resources that best meet the "needs of the American people." Not the needs of the Chinese. Not the needs of people of other countries. Mt. Hope contains America's largest and highest grade undeveloped molybdenum. Molybdenum is called the metal of the 21st century, and is so crucial that China declared it a strategic metal. As you must know, a bank fully owned by the government of China, the Export-Import Bank of China (China Eximbank) loaned money to Sichuan Hanlong Group, and the money was passed to their subsidiary, Hanlong USA Mining for the Mount Hope Project.

In 1872, when the General Mining Law took effect, China didn't own \$1.1 trillion of United States bonds, bills and notes. China wasn't the world's second largest economy. China wasn't one of the biggest threats to the U.S. (National Intelligence Director James Clapper has stated China is now). If the BLM approves this project, the BLM will be allowing a limited and valuable resource, a strategic metal, to go to China, giving this foreign country even more power (at the very least, economic and technological advantage).

China is saving its own molybdenum supply and controlling prices of it by limiting exports of it, so it seems like China is driving the supply and demand.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 385, Comment 5

The DEIS also states "The project need is to meet the prevailing market demand for molybdenum (Mo)." What is driving this prevailing market demand? China. China will use the Mt. Hope molybdenum to make steel for its rapidly growing infrastructure (low end social housing, which is creating "ghost cities") and to sell to other countries. China needs molybdenum for about 26 new nuclear reactors it is building. (Considering the nuclear disaster at Fukushima, it seems this may not meet the future needs of any people.)

If China uses the largest and highest grade U.S. molybdenum resource, while saving their own supply, what country will have molybdenum in the end? And, more importantly to us, what country isn't going to have any molybdenum left?

Please answer this question when responding to my comment:

How does BLM approval of the sale of valuable U.S. resources to a foreign country best meet the present and future needs of the American people?

Disposition: Comment acknowledged; does not provide new information

Response

The Proposed Action is allowed under FLPMA. Most of this comment is outside the scope of the EIS.

Letter 385, Comment 6

Agriculture is the backbone of our country. This project will have a huge impact on your friends and neighbors who are farmers and ranchers. Many of these families have been stewards of the land for generations. Will there be water to sustain agriculture in this area in fifty years?

Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 385, Comment 7

The BLM has a lot of pretty 4 color detailed maps in this DEIS, but NOT ONE 1' or 5' water drawdown map. By not including a 1' or 5' water drawdown map, the BLM has willfully minimized the impact of water use by the mine, which could adversely affect agriculture (and wildlife). The BLM has deceived the American public by omitting this. This willful deception is not meeting the present and future needs of the American people and is in violation of FLPMA.

At the hearings at the Nevada Division of Water Resources, one General Moly Executive stated that BLM told them to only do 10' water drawdown maps. Since they don't take long to do, and don't cost too much, what was BLM's reason for this direction?

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 385, Comment 8

On ES-10, the BLM states their preferred alternative is the approval of this project to "best fulfill the agency's statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors." This might make the American people wonder if BLM's mission and responsibility is mismanagement and lack of foresight that will run America into the ground.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 385, Comment 9

BLM's DEIS states that if Eureka Moly doesn't mine this area, the area will remain available for future mineral development. Well, what about this? I think BLM needs to consider that if an American company mines molybdenum for use in America, the mining use might better align itself with FLPMA and the present and future needs of the American people.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 385, Comment 10

As for 3.13 of the DEIS, regarding Wild Horses (page 3-407), this page was generic, vague and contains incorrect information (for example, that wild horses "have no natural predators"). This DEIS does not give any specific, detailed information about wild horses in the area (how many?), or nearby HMAs (how many?) or how a 1' water drawdown could dry up streams and affect the wild horses. Less water also means less forage.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 385, Comment 11

I am also including the 3 articles below, which I wrote, as part of my reasoning as to why the Mt. Hope Project will NOT meet the present and future needs of the American people (in connection with 1.4, Purpose and Need for the Action, of the DEIS).

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 385, Comment 12

In conclusion, the BLM has NOT PROVED the "need for this action" in this DEIS, and if the BLM approves the Mount Hope Project, the BLM will be in violation of FLPMA.

Disposition: Other (SEE RESPONSE)

Response

CC-111-FLPMA Compliance

Letter 386

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 386, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 386, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 386, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 387

Comment 1

I am writing in support of General Moly's Mount Hope project that is under review. While mining is certainly damaging to the environment, it is essential to the way we live. Technology is not possible without minerals, and minerals have to come from the ground.

It is our responsibility in the mining industry to minimize the impact of extracting the products that society needs; unfortunately there is an unavoidable trade-off between limited environmental damage and living in a technological age. Everyone knowingly or unwittingly accepts the trade-off every time a product is purchased or the lights are turned on. The most ardent mining opponent in America owns a lot of rock in tailings impoundments around the world. Electricity doesn't come from the outlet in the wall, and i-pads don't appear of their own volition at the Apple store.

There are at least a billion people world wide with no indoor plumbing or electricity. The world demands a higher standard of living, and it is disingenuous for those of us with two cars and a two thousand square foot house to say that the environmental damage must stop now. At the same time, the US economy is hurting. The minerals needed to lift the most impoverished people in the world into the age of toilets that flush into a treatment plant instead of the street at their doorstep will have to come from somewhere. Let's put Americans to work producing a salable product instead of just selling debt to the Chinese.

Please approve the Mount Hope Project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 388

Comment 1

I work for a heavy civil, mining general contractor that has maintained a local office in Carlin, Nevada since 1987. I have been following the development of the Mt. Hope Project for several years and have been anxiously waiting for them to secure the required regulatory approval and the project to break ground.

It appears the Company has retained many qualified persons who performed extensive planning and analysis including engineering, social, economic and very detailed environmental assessments in the Draft Environmental Impact Statement for the project. I am very confident in General Moly's management and their commitment to environmental stewardship.

The design and construction of this project will provide hundreds of well-paying construction jobs for 20 months and another 400 long-term well-paying jobs for decades to come. These jobs represent a tremendous benefit to fellow employees and to Eureka County, the State of Nevada, providing long-term economic benefits.

I support the Mt. Hope Project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389

Comment 1

BLM's approval of carefully designed projects like Mount Hope will do much to help close this glaring economic and national security gap.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389, Comment 2

As the DEIS shows, General Moly is committed to doing minerals development the right way. It has proposed a plan that will meet all required environmental standards on a small environmental footprint. Further assurances of environmental stewardship are exhibited through the extraordinary measures the company has committed to undertake to make sure the project is both protective of the environment/ wildlife and maximizes recreational opportunities. We would particularly point to General Moly's emphasis on minimizing impacts on local and regional water resources. Their plan goes to great lengths to assure that mining operations will not adversely affect other water consumers.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389, Comment 3

The Mount Hope mine will promote significant job and other economic opportunities in Nevada, creating an average of more than 375 jobs during the year-and-a-half construction period, followed by 400 employees during multi-decade life of the mine.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 389, Comment 4

The Roundtable strongly urges the BLM to issue a final EIS and Record of Decision allowing the Mount Hope Mine to be built. Thank you for your consideration of these comments.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 390

Comment 1

Choose the NO ACTION ALTERNATIVE

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 390, Comment 2

Do one foot and five foot water drawdown maps for this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 390, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 390, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 390, Comment 5

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (*Felis concolor*) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 390, Comment 6

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future.

Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 390, Comment 7

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 390, Comment 8

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 390, Comment 9

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 390, Comment 10

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros ... and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 390, Comment 11

Finally: if we take "multiple use" to mean a balanced representation of all the values and presences on the public lands taken as a whole, then the proposed action through its undermining of the relatively minor presence of wild horses in their small fraction of the public lands where they have a legal to live – clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, the Multiple Use and Sustainability Act and others.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 391

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 391, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

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Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

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Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 391, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 391, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 392

Comment 1

Choose the NO ACTION ALTERNATIVE

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 392, Comment 2

Do one foot and five foot water drawdown maps for this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 392, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

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Disposition: Factual correction made (SEE RESPONSE)

Response

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Letter 392, Comment 6

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Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 392, Comment 7

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 392, Comment 8

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 392, Comment 9

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled. In it there would be no hope at all for the beautiful natural life community and its wild horses. Your treatment of the long-term viability of the affected wild horse population and the meta-population to which it contributes is entirely lacking.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 392, Comment 10

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros ... and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 392, Comment 11

Finally: if we take "multiple use" to mean a balanced representation of all the values and presences on the public lands taken as a whole, then the proposed action through its undermining of the relatively minor presence of wild horses in their small fraction of the public lands where they have a legal to live – clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, the Multiple Use and Sustainability Act and others.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 393

Comment 1

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use are appropriately assessed

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 393, Comment 2

Ecological balance cannot be ascertained without scientific investigation and careful analysis of the area to include one foot and five foot water draw down maps.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 393, Comment 3

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and moved from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 393, Comment 4

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 393, Comment 5

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 393, Comment 6

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 393, Comment 7

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 394

Comment 1

Choose the NO ACTION ALTERNATIVE

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 394, Comment 2

Do one foot and five foot water drawdown maps for this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 394, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 394, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 395

Comment 1

choose NO ACTION ALTERNATIVE until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 395, Comment 2

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 3

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 395, Comment 4

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 5

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 6

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 7

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 395, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 395, Comment 9

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 396

Comment 1

BLM MUST CHOOSE The "NO ACTION ALTERNATIVE"

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 397

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 397, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Comment acknowledged; does not provide new information

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 397, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 397, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 398

Comment 1

I strongly urge adoption of the NO ACTION alternative

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 398, Comment 2

To do otherwise would violate the WFHBA on many points in addition to NEPA, since the proposed action would constitute a significant negative impact on the formerly healthy and vital Roberts Mountain Complex wild horse herd as well as the entire health of the range in that area – forage, wildlife, wild horses, water and the very land itself.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 398, Comment 3

Multiple use" means a balanced representation of all the values and presences on the public lands taken as a whole and the proposed action clearly does not accord with true multiple use. This violates the WFHBA as well as the Federal Land Policy and Management Act, the Public Lands Improvement Act, and the Multiple Use and Sustainability Act.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 399

Comment 1

I would like to express my positive support for the Mt. Hope mining project proposed by General Moly. The outlined proposal, as well as the track record and commitment to sustainability that General Moly has proven, has my support as a tax payer and avid user of our public lands.

This project would create long term jobs for many in the state of Nevada. In addition to jobs created locally, using our countries natural recourses in a responsible manner strengthens our country as a whole.

Thank you for taking my opinion into consideration when making decisions regarding this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 400

Comment 1

I fully support the efforts of General Moly in their quest to mine in Eureka at the New Hope project. General Moly has a great track record when it comes to the environment and their ability to blend economic growth into such developments. The state of Nevada and the entire US needs more projects like this to energize the economy and build for the future. Please consider a positive stance when you vote on this application.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 401

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance".

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 401, Comment 3

This project encroaches on considerable acreage within thee HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 401, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 401, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 402

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 402, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 402, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 402, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 402, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 402, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 402, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 402, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 402, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 403

Comment 1

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 403, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 403, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 403, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 404

Comment 1

please stress to BLM to choose the NO ACTION ALTERNATIVE.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 404, Comment 2

The proposed impact to the wild horse populations in affected HMA's is not acceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is unacceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 3

Prior to any the decisions of the project proposals, 1' & 5' water draw down maps need to be created.

Formulating a record of decision, without this information is inappropriate & negligent, to the mandate of a "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 404, Comment 4

This project encroaches on considerable acreage within three HMA's.

* Roberts Mountain has 13,000+ acres, within the scope of the project & 5,000+ acres of proposed surface disturbance.

* Whistler Mountain HMA has 8,000+ acres, within the project scope & 3,000+ acres projected for surface disturbance.

* Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 5

The Wild Horse populations in this area are confined (predominately re: Fish Creek) by boundary lines, that include 'limited to no water'.

As they move from within these HMA's, the impact to these areas & consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 6

The project will require 7000 gallons of water per minute, for the lifetime of the proposed use (40-50 years) & will remove 11,300+ acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 7

The known movement patterns of these horses, in these 3 areas indicate that the present HMA boundary lines were/are flawed and must be reviewed.

The lack of water sources within the boundary lines indicate they were faulty in their inception

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 404, Comment 8

It is not enough to mitigate for spring repair after the projects construction phase has ended.

If the project is to be considered, new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them.

In the event of impact, adjacent and equal acreage must be provided for these Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 9

This project has and does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 404, Comment 10

"No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 405

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 405, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 405, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 405, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 405, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 405, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 405, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

8) This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 405, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 405, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 406

Comment 1

This is what I have done in the past 65 years. Tried to keep them free.. I have seen them Poisoned Shot Yes by BLM U.S. National Forest Service RIFLES FOR HIRE. Now CHOPPERS FOR HIRE TO RUN THEM DOWN TELL THEY DIE. THEN YOU CALL YOUR SELF'S THE KEEPERS OF THE WILD HORSES YOU WILL LIKE THIS> NO CUTTING YOU DOWN JUST THE TRUTH. Play it Please

Disposition: Other (SEE RESPONSE)

Response

This comment is beyond the scope of this EIS.

Letter 407

Comment 1

I strongly urge adoption of the NO ACTION alternative.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 407, Comment 2

To do otherwise would violate the WFHBA on many points in addition to NEPA, since the proposed action would constitute a significant negative impact on the formerly healthy and vital Roberts Mountain Complex wild horse herd.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 407, Comment 3

When stating that there are "no natural predators" of wild horses found in the area you are misleading the public. The puma (*Felis concolor*) occurs here and is a significant natural predator of these animals. Coyotes may also take foals and other disadvantaged wild horses. These species should not be overlooked nor should our own species, members of which do frequently and illegally kill wild horses, either directly or indirectly.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 407, Comment 4

Your analysis lacks consideration of the negative ecological effects of the more shallow water table drainages, as would be caused by the huge open pit, trenches, as well as the short- and long-term toxic effects of chemicals used in crushed ore leaching and natural leaching of discarded crushed ores that involves sulfur and nitric acids. These ill-effects can last for centuries into the future.

Disposition: Already addressed in planning documents

Response

CC-006-Local Hydrologic Model

Letter 407, Comment 5

You should do an analysis of both one-foot and five-foot drainages, including maps, for these affect many species, and it would prove very difficult to adequately mitigate for their pervasive ecological damages.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 407, Comment 6

You need to examine the mandate of the WFHBA to maintain a "Thriving Natural Ecological Balance" as per Section 3a. This unanimously passed Act represents the General Public's keen interest in our public lands and its, in fact, returned North American native wild horses and burros.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 407, Comment 7

The Mount Hope project would clearly upset this balance and, for this reason, needs to be cancelled

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 407, Comment 8

In my opinion, this mining project jeopardizes the long-term health and viability of the herd and herds surviving here and in no way accords with Section 2c of the WFHBA. This section defines a legal herd area as "the amount of land necessary to sustain an existing herd or herds of wild free-roaming horses and burros ... and which is devoted principally but not necessarily exclusively to their welfare in keeping with the multiple use management concept for the public lands."

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 408

Comment 1

As a supplier of products and Nevada resident I am extremely interested in seeing the General Moly Mt. Hope molybdenum mine in Eureka, Nevada receive its federal and state permits, commence construction, and begin operation.

We are suffering from the worst economy in decades, I understand that Nevada is at the bottom of the list and the only bright spot in the state is the mining industry. In fact, the Mt. Hope Mine will diversify the mining industry in Nevada and will bring the Silver State much needed economic development.

Unfortunately, I have read reports that the Board of Eureka County Commissioners are continually putting up unfounded and unnecessary obstacles to delay the permitting process of General Moly's Mt. Hope project. Indeed, such nonsensical actions by a government entity such as the Eureka County Commissioners, which is well-funded primarily from mining tax revenue, could not only jeopardize the Mt. Hope project, but future natural resource projects as well.

From what I understand, the Mt. Hope project is an environmentally sound project. The management at General Moly is committed to environmental stewardship and will comply with established policies and regulations enforced by the recognized agencies and authorities such as the BLM and the State of Nevada.

While the molybdenum mine at Mt. Hope will directly benefit my employer, its employees and their families, it will also have a strong economic effect upon the suppliers from whom we make our purchases. Therefore, this worthwhile project will substantially augment the State of Nevada and our nation's economy during a time when our country and its citizens need it most.

I would like to add my name to those who support the much needed start-up of General Moly's Mt. Hope project in Eureka, not only for me, but for the general well-being of the citizens of Nevada.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 409

Comment 1

The Nevada Department of Wildlife (NDOW) is concerned with direct, indirect, and cumulative impacts to fish and wildlife resources and habitats.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 409, Comment 2

NDOW has worked closely with all partners throughout the development and review of this project; however, there are still a few items in the proposed action that still need to be addressed. In section 2.1.14.5, the document states that unburied portions of the pipeline will have earthen crossings installed to allow sage grouse chicks to cross. Please note that these earthen crossings should also be seeded with an appropriate seed mix to 1) preclude the establishment of noxious and invasive weeds, and 2) provide cover to any sage grouse that use it.

Disposition: Other (SEE RESPONSE)

Response

The suggested text has been added to the Sage Grouse Conservation Measures included in Appendix D, Attachment 3 of the EIS.

Letter 409, Comment 3

Upon review of the mitigation triggers in Section 3.2 Water Resources – Water Quantity, Table 3.2-9 identifies specific mitigation triggers for potentially impacted surface waters. NDOW is concerned with the mitigation trigger for Roberts Creek. The document states that the mitigation trigger is "cessation of flow coincident with a reduction in ground water levels". NDOW does not want to see a cessation of flow before mitigation is triggered. This could have serious detrimental effects on the sport fishery in Roberts Creek, as well as other wildlife dependent upon the associated riparian and aquatic habitat. We recommend that a reduced flow, beyond the scope of previously documented low flows, should be enough to trigger mitigation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 409, Comment 4

Impact 3.11.3.3-3 identifies potential impacts to vegetation associated with seeps, springs, and streams from the predicted water table drawdown. The mitigation measure for this impact states that riparian vegetation would be replaced; however it does not provide monitoring protocol for measuring the success of this mitigation measure. If the vegetation is stressed due to lack of water, riparian vegetation may not recover, even when replaced and supplied supplemental watering.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 409, Comment 5

The noise analysis in Section 3.16 only addresses Alpha Ranch, Roberts Creek Ranch, Risi Ranch, and the Diamond Valley residences as noise-sensitive receptor sites. There was a discussion to include several sage grouse leks in Kobeh valley as noise-sensitive receptor sites and to re-run the analysis to evaluate the potential impact to these resources. When is this analysis planned to be completed?

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 409, Comment 6

Additionally, the document states that in order for a noise impact to be significant, maximum noise levels must exceed 70 dBA at sensitive receptor sites. Where did this level of significance come from? The BLM's new IM states that projects that raise the noise level 10 dBA above ambient can have a significant impact on sage grouse lek activity. This analysis should be reevaluated.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 409, Comment 7

In Impact 3.16.3.3-4, there is no discussion on the potential impacts to leks, but there is the statement, in the Significance of Impact section for this item, that "greater sage-grouse leks could be significant if such activities occurred at nighttime or if the noise level exceeds 55dB." There are inconsistencies in this section that need to be addressed to ensure that sage grouse leks will not be significantly impacted by noise.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-133-Greater Sage-grouse Lek Sensitive Receptors

Letter 409, Comment 8

Finally, in Impact 3.23.3.3-3, the DEIS acknowledges the potential impacts to sage grouse from noise and states that the mitigation in Appendix C will be effective to reduce impacts to sage grouse. However, there is no additional monitoring to ensure that these potential impacts will be insignificant and no contingency plan if impacts are significant and are realized. NDOW would like the opportunity to discuss these issues further with the BLM.

Disposition: Other (SEE RESPONSE)

Response

The BLM met with NDOW several times and has revised the noise requirements in Appendix D (formerly Appendix C in the DEIS) according to their requests.

Letter 409, Comment 9

The mitigation for the potential loss of water to wildlife in Impact 3.23.3.3-4 states that the development of six water development sites, as identified as mitigation for wild horses in Section 3.13, will also benefit wildlife. These developments, if designed for wild horses or livestock, may not provide benefits to wildlife. Wild horses have a tendency to exclude wildlife from water sources and otherwise damage them beyond use. Additionally, if the water developments are not designed properly for wildlife, they may not provide a benefit. NDOW would like the opportunity to discuss the development of drinkers and guzzlers designed to ensure benefits for wildlife (that may include exclusion fencing), should we find that wildlife are not benefitting from the water developments.

Disposition: Analysis modified (SEE RESPONSE)

Response

The text for Mitigation Measures 3.23.3.3-4, 3.23.3.5-4, 3.23.3.6-4, and 3.23.3.7-4 have been modified as follows, "Mitigation for the potential loss of water would include the development of six water sites (Figure 3.13.1) that were identified for wild horses and two additional sites that would be designed specifically for wildlife use. Although the sites shown on Figure 3.13.1 were identified as part of mitigation for wild horses (Section 3.13), development of the sites could also result in indirect beneficial impacts to wildlife species throughout the Project Area. The locations and design of the wildlife-specific water developments would be determined by the Wildlife Working Group described in the Sage Grouse Conservation Measures in Appendix D, Attachment 3. Additional mitigation has been proposed for wetland vegetation in Section 3.11 (Mitigation Measure 3.11.3.3-3)."

Letter 409, Comment 10

There appears to be several inconsistencies in the reference to previous mitigation throughout the wildlife mitigation section. The mitigation for Impact 3.23.3.3-4 references the proposed wetland vegetation mitigation in Section 3.11 and states that "...wetland vegetation in Section 3.11 (Mitigation Measure 3.11.3.3-1), which includes a replacement of riparian vegetation at a 3:1 ratio with local cuttings, plugs, or seeds". However, when the reader refers to Impact 3.11.3.3-1, it states that "The Project would not result in the removal or disturbance of wetlands in the Project Area", hence the impact is not significant and no further mitigation is proposed. This inconsistency is carried through to Mitigation Measure 3.23.3.7-4, and may be systemic through the document. Please confirm that the impact is anticipated and there is a need for the identified mitigation to compensate for the loss of wetlands at a 3:1 ratio, and remove any ambiguity in the document.

Disposition: Factual correction made (SEE RESPONSE)

Response

Mitigation measures 3.23.3.3-4, 3.23.3.5-4, 3.23.3.6-4, and 3.23.3.7-4 have been corrected to reference mitigation measure 3.11.3.3-3.

Letter 409, Comment 11

NDOW has concerns about the proposed mitigation measure for golden eagles in Impact 3.23.3.3-8. The mitigation only states that monitoring will be conducted and if a negative impact is perceived, the BLM biologist will be notified. Notification and documentation of a negative impact does not provide mitigation for that impact. Notification and monitoring are insufficient measures to compensate for impacts. Some other positive action should be identified which will minimize or offset the impact. Additional language about what Eureka Moly and the BLM will do in the event of a negative impact should be included.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-041-Golden Eagle Mitigation

Letter 409, Comment 12

NDOW has concerns with the Longer, Slower Alternative. This alternative will have greater impacts to wildlife, as a result of the increased duration, and there is no additional mitigation proposed for those impacts from the increased duration of the project. Currently, the document states, in Impact 3.23.3.7-3, that impacts will be significant, but "no mitigation is proposed at this time." At a minimum, mitigation for significant impacts should be identified and in place. NDOW would like the opportunity to discuss additional mitigation for this alternative with both Eureka Moly and the BLM.

Disposition: Analysis modified (SEE RESPONSE)

Response

The text for Impact 3.23.3.7-3 has been revised to be consistent with the impact identified for the Proposed Action, which includes the mitigation outlined in Appendix D, Attachment 3.

Letter 409, Comment 13

NDOW has been a partner with the BLM and Eureka Moly throughout the development of this document. The process has been long, and as such, in the past 4 years, there have been changes to suggested monitoring, mitigation, and management of sage grouse and their habitats. NDOW would like the BLM to utilize the Nevada's Energy and Infrastructure Development Standards to Conserve Greater Sage Grouse Populations, which has been adopted by the BLM. This document specifies that energy structures, including powerlines, should not be placed within a 3 mile buffer around active sage grouse leks. Additionally, it states that buried infrastructure such as pipelines and powerlines should not be constructed within 0.6 miles (1km) of lek sites. Finally, it suggests that sagebrush habitat be replaced at a 3:1 mitigation ratio. The BLM's recent IM provides guidance along these lines. These are based on the most current research and should be incorporated into mitigation for this project.

Disposition: Other (SEE RESPONSE)

Response

Nevada Energy and Infrastructure Development Standards to Conserve Greater Sage-Grouse Populations and Their Habitats (2010) has not been formally adopted by the BLM. However, the BLM referenced this document in the preparation of many of the design

features and mitigation measures included in the Sage Grouse Conservation Measures found in Appendix D of the FEIS. Additional consultation with NDOW was also conducted to ensure agreement on the final items included in Appendix D.

Letter 409, Comment 14

The final issue regarding mitigation is identified in Appendix 6 in the Mitigation Summary Plan. Under section 13 for Wildlife and Fisheries Resources, Mitigation Measure 6 states that EML will create a funding source for future sagebrush habitat improvement projects in the area. NDOW believes this is an extremely important mitigation measure and would like the opportunity to work with the BLM and EML on furthering its development. We feel strongly that this needs to be resolved before the FEIS. Please contact us to further these efforts.

Disposition: Analysis modified (SEE RESPONSE)

Response

The BLM conducted additional consultation with the NDOW to finalize the mitigation measures for sagebrush-obligate species. The mitigation for both greater sage-grouse and pygmy rabbits now includes measures for off-site habitat improvements based on the impacts resulting from the permanent loss of habitat within the project area. These requirements can be found in Mitigation Measure 3.23.3.3-9 and Appendix D of the FEIS.

Letter 410 (F1) through Letter 791 (F1)

See Letter 248 for form letter text and response.

Letter 792

Comment 1

I would like the mine to put in a watering area on the east side of the boundary fence

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 792, Comment 2

Restore water at the Romano stock well for watering livestock

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 792, Comment 3

Run a 114 "black pvc pipe from the pond 400 to 500 feet on the east side of the boundary fence into a 12' power river trough.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-118-Range Mitigation

Letter 793

Comment 1

Please choose No Action Alternative

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 793, Comment 2

the BLM is mismanaging the land and herds they are supposed to protect. Methods of roundups are in violation of the Roam Act. Leave our horses alone.

After forty years it is obscene that no care standard exists for the only animal in our history to have an entire act of Congress devoted solely to its protection.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 794

Comment 1

NO ACTION ALTERNATIVE is the only way to proceed until a humane & reasonable alternative can be reached.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 795

Comment 1

I appreciate the opportunity to add my voice to that of others in supporting the preferred alternative for the proposed mine at Mount Hope.

The DEIS presents a clear picture of how General Moly will proceed in opening and operating this mine and the economic, environmental, and social benefits of this mine are deserving of approval.

With the BLM as the lead agency, this Draft Environmental Impact Statement covers all the bases and exceeded the federal requirements for planning, analysis and mitigation. You are to be commended.

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

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 796

Comment 1

In table 3.2-9 and 3.2-18, mitigation measures call for substantial diversion rates that are over and above the 11,300 acre feet per year of appropriated water. For example, one mitigation measure for a cessation of flow in Henderson Creek would call for an interbasin transfer of water from Kobeh Valley in the amount of approximately 1400 acre feet of water. This is in addition to the 11,300 acre feet of groundwater required for the project. This project does not have sufficient water for this mitigation measure.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-062-Mitigation of Diminished Water Flows

Letter 796, Comment 2

To intentionally discount the importance of these groundwater resources and to not include the Nevada Department of Water Resources as a cooperating agency and to not cite Nevada Water Law statutes when considering environmental impact severely impairs the credibility of the document. The impacts of this project could negatively affect the viability of the agricultural base in Eureka County and will, by EML's own admission, impair vested rights and subsisting rights in the vicinity of the project. This is in direct violation of NRS 533.085 and NRS 533.495.

Disposition: Already addressed in planning documents

Response

CC-072-Project Impacts to Water Resources

Letter 796, Comment 3

The DEIS document is replete with possible impacts to water, but is obviously lacking in the proper way to address the impacts to affected owners of water rights. It is imperative to reference Nevada Water Law statutes because vested rights and subsisting rights cannot be impaired.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 796, Comment 4

I am very concerned about the obvious impacts from traffic on SR278. I am even more concerned that the DEIS concludes that these impacts are insignificant. An increase in 19 truck trips per day to deliver chemicals is an 85% increase over current truck trips, not the 15 percent stated in 3.24.3-1. When increased passenger car traffic is added, this is obviously significant and mitigation is required.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-069-Mitigation for Impacts to Highways

Letter 797

Comment 1

The proposed impact to the populations of affected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 797, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 797, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 797, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Other (SEE RESPONSE)

Response

Section 3.13 outlines the potential impacts to wild horses and mitigation for all the alternatives that are analyzed in the EIS. No changes have been made to the EIS to address this comment.

Letter 797, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 798

Comment 1

I urge the BLM to choose the "No Action" alternative

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 798, Comment 2

The proposed impact to the populations of effected wild horse HMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 798, Comment 3

No action must be chosen until the full impact to this legally mandated use is appropriately assessed

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 799

Comment 1

Choose the NO ACTION ALTERNATIVE

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 799, Comment 2

Do one foot and five foot water drawdown maps for this project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 799, Comment 3

This proposed use will use a lot of water from the aquifer and take away from wild horse use, thus not maintaining a "thriving natural ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 799, Comment 4

The BLM's vague analysis of wild horses in this DEIS was generic, incorrect (horses have "no natural predators"), less than a page long and did not specifically address wild horses in nearby areas. Thank you for your consideration. Marilyn Wilson, 3345 Beitey Rd., Valley, Wa., 99181.

Disposition: Factual correction made (SEE RESPONSE)

Response

CC-079-Wild Horse Predators

Letter 800

Comment 1

I support the Mt. Hope project being permitted and allowed to move forward into construction and operation. The Draft EIS appears complete. I am convinced that the project will be developed and operated in an environmentally and socially responsible manner. Our country needs investments that result in job creation and economic benefit that also protect the environment and respect social aspects, and the Mt. Hope project would accomplish all of these.

Please support the Mt. Hope project.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 801

Comment 1

The proposed impact to the populations of effected wild horseHMA's is unacceptable. The population numbers are already below genetic viability and the potential impact to water and legal grazing area is not acceptable.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 2

One foot and five foot water draw down maps must be created before any decisions can be proposed for the project. To formulate a record of decision without this information is inappropriate and negligent to the mandate of "thriving ecological balance."

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 801, Comment 3

This project encroaches on considerable acreage within three HMA's. Roberts Mountain has over 13,000 acres within the scope of the project with over 5,000 acres of proposed surface disturbance. Whistler Mountain HMA has more than 8,000 acres within the project scope and over 3,000 projected for surface disturbance. Fish Creek also has areas that would have surface disturbance.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 4

As the populations in this area are confined (predominately re: Fish Creek) by boundary lines that include limited to no water and move from those HMA's the impact to these areas and consequence to any future populations must be of primary focus as "multiple use" is mandated under law.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 5

The project will require 7000 gallons of water per minute for the lifetime of the proposed use (40-50 years) and will remove more than 11,300 acre feet of water annually. This is not acceptable considering the already fragile sources available to wild herds and other wildlife.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 6

The known patterns of movement of these horses in these three areas indicates that HMA boundary lines were/are flawed. The lack of water sources within the boundary lines indicate they were faulty in their inception.

Disposition: Not within document/decision scope (SEE RESPONSE)

Response

CC-092-Wild Horse Movement Patterns within HMA

Letter 801, Comment 7

It is not enough to mitigate for spring repair after the projects construction phase has ended. If the project is to be considered new boundary lines should be mitigated to ensure that populations do not go any lower than they already are. Mitigation needs to ensure that the horses do not lose any grazing acreage available to them. In the event of impact that adjacent, equal acreage is provided.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 8

This project does not fully study the impacts and potential areas for mitigation for Wild Horses.

Disposition: Comment acknowledged; does not provide new information

Response

CC-078-Impacts to Wild Horses

Letter 801, Comment 9

The "No Action" Alternative must be chosen until the full impacts to this legally mandated use is appropriately assessed.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 802

Comment 1

FLPMA (The Federal Land Policy and Management Act of 1976) policy directs that BLM manage our land to "best meet the present and future needs of the American people", the DEIS fails to establish this fundamental step because the prevailing market need for the Moly is foreign.

Disposition: Other (SEE RESPONSE)

Response

CC-111-FLPMA Compliance

Letter 802, Comment 2

The DEIS recognizes Diamond Valley as the Terminus of the Diamond Valley Regional Flow System, but excludes all underground water rights and pending applications for underground water rights by Eureka Moly or its subsidiaries. This discredits the ability of the DEIS to make a fair and equitable assessment of the Water Resource and potential impacts of a huge project, 80 year time line and hundreds of year's drawdown due to an open pit that physically intersects 3 basins, Diamond, Kobeh and Pine valleys.

Disposition: Comment acknowledged; does not provide new information

Response

CC-010-EML Water Rights

Letter 802, Comment 3

A 5ft drawdown contour would be much more conservative assessment to impacts to vested surface rights, springs and meadows in the Well Field valley, and also a precursor to groundwater effects between basins that most likely share an underground aquifer.

Disposition: Comment acknowledged; does not provide new information

Response

CC-023-Ten-Foot Drawdown Contour

Letter 802, Comment 4

The Long Term Totally Consumptive use of the Water Resource by the project is not environmentally responsible given existing water use challenges. Pumping the majority of water from the original point of diversion (Bobcat Ranch) would have saved everyone millions of dollars and time.

Disposition: Already addressed in planning documents

Response

CC-072-Project Impacts to Water Resources

Letter 802, Comment 5

Monitoring cannot be considered Mitigation. Curtailing the projects ground water pumping is a mitigation measure that Nevada Water Law provides, the DEIS should incorporate this management tool as a relevant, reasonable mitigation measure.

Disposition: Comment acknowledged; does not provide new information

Response

CC-035-Monitoring Concerns

Letter 802, Comment 6

Mitigation measures and continued funding may be our only resource to alleviate negative affects if Eureka Moly Water Model predictions are wrong, potential impacts are larger than expected or the Mine closes. This long term project has potential to benefit its corporate owners at the expense of changing a community and its environment forever in a very negative fashion.

Disposition: Comment acknowledged; does not provide new information

Response

CC-073-Mitigation Impacts to Water Users

Letter 802, Comment 7

For these personal concerns and those of Eureka County and its citizens, I see no evidence this DEIS adequately protects potential impacts to the people, businesses and resources of Eureka County in its current form.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 803

Comment 1

...the DEIS continues to evade specification of an effective monitoring, management, and mitigation (3M) plan that enforces changes in project operations to avoid adverse impacts and that seeks foremost to anticipate and avoid such impacts; and while the slower, longer project alternative is included, it is not analyzed to demonstrate its benefits and thereby earn designation as environmentally preferable. In short, BLM must take greater steps to ensure its commitment to monitor and, if necessary, mitigate a full range of environmental impacts in cooperation with parties directly affected by the project. The County recognizes the difficulty in crafting a long-term 3M plan that commits firmly to dealing with mine-related problems, but the Mt. Hope project – with its decades of proposed operation and large geographical extent of impacts in Eureka County– requires nothing less.

Disposition: Already addressed in planning documents

Response

The FEIS discloses proposed mitigation by resource. Additionally, Section 2.1.15 of the FEIS describes that monitoring would be conducted for the project. This section also describes the formation of an advisory committee following issuance of a ROD. The Slower, Longer Project Alternative is analyzed in the FEIS on a resource-by-resource basis to disclose potential impacts.

Letter 803, Comment 2

At the conclusion of this letter the County provides specific comments addressed to identified paragraphs and pages of the DEIS. In this letter, we highlight thematically the analysis needed that in our judgment will produce compliance with the National Environmental Policy Act and Federal Land Management Policy Act, and more importantly produce a commendable Mt. Hope project. The County asks BLM to use this EIS and this project – a mining proposal in size and duration of virtually unprecedented intensity – to attain a state-of-the-art achievement in environmental assessment and minerals management.

Disposition: Already addressed in planning documents

Response

The BLM has complied, and will comply, with all applicable laws considering the impact of the proposed project. The Federal Land Policy and Management Act (FLPMA) and the 3809 regulations require that BLM prevent unnecessary or undue degradation of public lands by operations authorized under the mining laws, and anyone intending to develop mineral resources on public lands must prevent unnecessary or undue degradation of the land and reclaim disturbed areas. "Unnecessary or undue degradation" is defined at 43 CFR § 3809.5. As discussed in Sections 1.1 and 1.5.2 of the EIS, in order to use public lands managed by the BLM's Battle Mountain District Office, EML must comply with the BLM Surface Management Regulations (43 CFR 3809) and other applicable laws, including the Mining and Mineral Policy Act 1970 (as amended) and FLPMA. In assessing compliance with the unnecessary or undue degradation standard, BLM looks at the law, the regulations, and agency guidance. BLM's analysis of EML's Plan of Operations for the Project complies with statute, the regulations, and applicable guidance. No change has been made in the FEIS in response to this comment.

Letter 803, Comment 3

The affected natural resource that pervades the entire project and its surrounding environment is water. The DEIS's failure to treat this resource with requisite attention, detail, and quantification affects the sustainability of this resource on its own; but perhaps more importantly, the failure to protect water produces a failure to protect resources critical to Eureka County agriculture and recreation and the health and wellbeing of the County's residents. The County highlights as an example the superficial treatment of proposed dewatering of Roberts Creek (including the corollary of increasing groundwater extraction to pipe that substitute supply into the creek as a mitigation measure). The County questions the DEIS's assertion that reduction in creek flow will not become significant until the stream is completely dewatered; and the corollary suggestion that expanding groundwater extraction, beyond that already specified for direct application to mining operations, and lacing the landscape with pipes, would provide worthy or effective mitigation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 803, Comment 4

Related to the proposal at Roberts Creek, with its threat to one of Eureka County's rare natural water and recreational resources, is the DEIS's failure to analyze the consequences of providing a substitute source of mining operation water by moving the mine's proposed Kobeh Valley groundwater pumping field south into the phreatophyte zone. The wisdom, and indeed the feasibility, of this suggestion cannot be measured from the DEIS, which fails to apply well-established analysis to define changes in surface vegetation resulting from discrete levels of groundwater drawdown. And without a measurement of vegetation change, the DEIS is not capable of measuring associated increases in fugitive dust and attendant air quality degradation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020- Impacts to Phreatophytes

Letter 803, Comment 5

Related to measures that can mitigate the mine's water demand without creating yet additional water demand, the County has proposed in its discussions with the mine owner that water demand be met with existing wet water in Diamond Valley, by securing and retiring an equivalent amount of available water rights in Diamond Valley. Because these discussions have not borne fruit, BLM should take the initiative to include this option in its final assessment of water resources.

Disposition: Comment acknowledged; does not provide new information

Response

This type of mitigation would not mitigate any of the direct impacts of the Project to ground water or surface water. Therefore, this type of mitigation is not considered appropriate for this Proposed Action.

Letter 803, Comment 6

These examples reveal an even more fundamental shortcoming in the draft EIS: a failure to provide a water budget for existing water uses, the mining project, and the project's proposed mitigation measures. In an attempt to anticipate and accommodate stated objections to the project as proposed, the DEIS promises much but fails to establish that on its own, or in the company of all its promised mitigation, the mine, existing users, and the environment are capable of being supported by the natural water resources of Eureka County.

Disposition: Already addressed in planning documents

Response

CC-047-Water Availability

Letter 803, Comment 7

The County needs this missing analysis so that it can as cooperating agency assist BLM and the mine proponent in establishing an operation that is both beneficial and actually feasible of being accomplished. If, for example, the limited water resources available dictate that mining operation will require a loss either of Roberts Creek or of the phreatophytic vegetation to the south, the public and BLM need knowledge of the benefits and costs of the trade-off presented.

Disposition: Already addressed in planning documents

Response

CC-047-Water Availability

Letter 803, Comment 8

The EIS's air quality section fails to establish baseline air pollution values derived from monitoring within the affected area. The EIS instead utilizes data from several other locations around Nevada as its baseline for assessing the project's impacts. (EIS 3-272.) These locations vary enormously in their characteristics—Boulder City is 21 miles southeast and Jean 30 miles southwest of Las Vegas, while Great Basin National Park and its Lehman Caves National Monument are far removed from any metropolitan area—yet the EIS claims that all of these sites "conservatively represent" the background pollution concentrations at the Mount Hope site. (Id.) Two sites bordering one of the desert Southwest's largest urban agglomerations, and two sites in one of the most isolated and pristine areas of the lower 48 states, cannot conceivably represent comparative equivalence in air pollution levels. Claiming that all four sites are "conservatively high" reference points defies reality and highlights the need for local air quality data.

Disposition: Other (SEE RESPONSE)

Response

CC-129- Baseline Air Pollution Levels

Letter 803, Comment 9

To provide a proper assessment of the project's likely impacts on criteria air pollutant concentrations around the project site, the concentrations in the affected area itself must form the baseline for analysis, not the concentrations in proxy areas dozens or hundreds of miles away in different air basins with different sources of pollution. The importance of establishing locally relevant baseline data is amplified where, as in this case, the emissions from the project will push ambient air quality close to the legally permissible level for several pollutants. (EIS 3-276 to 3-277.) The existing, large-scale mines in Eureka County also undoubtedly affect the region's air quality, and by not basing its analysis on datasets that encompass these sources, the EIS has divorced its air quality modeling from the local conditions in which the proposed mine will operate. The EIS's conclusions are therefore unreliable as a measure of the project's potential effects on Eureka County.

Disposition: Other (SEE RESPONSE)

Response

CC-129- Baseline Air Pollution Levels

Letter 803, Comment 10

Instead of depending on unfounded assumptions about the atmospheric equivalence of Eureka County and other parts of Nevada, BLM should establish air quality monitoring stations within the same air basin as the proposed mine, collect data for an appropriately representative period, and apply these data to the EIS's assessment of air quality impacts. This is the only means of determining, with any degree of accuracy, the project's effects on Eureka County's ambient air quality. We understand that this effort may require up to 18 months of monitoring, but the applicant and BLM have had years in which to accomplish this.

Disposition: Other (SEE RESPONSE)

Response

CC-129- Baseline Air Pollution Levels

Letter 803, Comment 11

The EIS suffers from additional infirmities in its analysis of the project's likely contributions to increased air pollution. One infirmity arises in the EIS's failure to consider how the drawdown of Kobeh Valley's groundwater will affect phreatophytic plants. As the EIS acknowledges, the mine's groundwater withdrawals will lower the water table in Kobeh Valley, creating conditions that could result in the dislocation or death of phreatophytes. (EIS 3-276.) While stating that these conditions may prevent soil crusting and generate wind-blown fugitive dust, the EIS dismisses such emissions as having merely an "incremental impact on the air quality in the vicinity of the Kobeh Valley." (Id.) No studies or analysis support this statement, though, and the EIS provides no evidence for its nonchalant treatment of this potentially significant source of particulate matter.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 803, Comment 12

Similar projects in the West have undertaken the analysis that is lacking in this EIS, and others have demonstrated the necessity of this analysis. The Los Angeles-Owens Valley groundwater pumping project, for example, culminated in an agreement to prevent vegetation change that would have led to fugitive dust emissions, accompanied by a meaningful environmental impact report. The EIS here should employ these available technologies to model the impacts of phreatophyte dislocation or death, and if such analysis reveals the impacts to be significant, BLM must craft mitigation measures that will prevent fugitive dust emissions while also avoiding an invasion of non-native plants in the affected areas.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-080-Fugitive Dust Emissions Mitigation

Letter 803, Comment 13

The EIS furthermore relies on an equipment manufacturer's assertions that the project will incorporate untested technologies—with claims of efficiency that exceed existing systems by a substantial margin—to reduce its air quality impacts below the level of significance. If these technologies fail to achieve their lofty targets, the EIS provides no backstop. There are no management actions and no mitigation measures that would address such a failure, and without these, the EIS ignores assessment of contingencies that would materially alter the project's impacts on the environment. BLM should establish a suite of management actions and mitigation measures that would enable the expeditious resolution of any problems associated with technological failure of air pollution control equipment.

Disposition: Comment acknowledged; does not provide new information

Response

Control efficiencies used in the air emissions inventory and dispersion model are a combination of agency-accepted values and manufacturers' estimates. This approach is both valid and consistent with accepted methods. The results of the modeling provided in the FEIS, therefore, disclose potential impacts using the best available science. Nevada has authority to regulate air quality, including delegated authority from the EPA for regulation of federal standards. The Project would be subject to the conditions of an NDEP-issued air quality permit to ensure adherence to emission limits and pollution controls, and preserve ambient air quality standards. It should be noted that the Project would include emission control technologies that have a long history of widespread use, and thus their control efficiencies are well-established.

Letter 803, Comment 14

As the mine proceeds into operation, determining the project's actual air quality impacts and effectively managing and mitigating them will require robust monitoring. Under Nevada's draft air quality permit, EML would need to install only a few air quality stations around the pit (measuring particulate matter on a non-continuous basis with filters) and continuous monitoring systems on the ore processing plants' stacks. This equipment will not capture mobile source emissions, nor will it measure detrimental air quality impacts that accrue beyond the project's borders. While Eureka County residents will bear the brunt of these impacts, they will not even know the extent and characteristics of these impacts once the impacts occur. BLM should as part of the 3M plan require EML to install air quality monitoring equipment that will provide relevant and usable data to enable management and mitigation of project emissions, as necessary, during the project's many years of operation.

Disposition: Comment acknowledged; does not provide new information

Response

CC-107-Air Quality Monitoring and Mitigation

Letter 803, Comment 15

Socio-economic impacts, and the means of eliminating or substantially reducing them, have not been adequately addressed. Project benefits are touted in terms of tax revenue to the County, and the favorable slower, longer alternative dismissed for not providing the most revenue in the shortest time. Contrary to the EIS's reliance on conventional wisdom, however, a projected increase in public revenue is not the County's greatest concern. The DEIS falls short in completely ignoring what matters more to the County: the need to avoid social disruption and provide for the health, wellbeing, and economic stability of individuals, families, farms, and small businesses affected by the proposed mine.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-002-Socioeconomics General Disruption

Letter 803, Comment 16

In this respect, the DEIS fails to include a beneficial feature of the mine as initially proposed: the applicant's responsibility for housing for construction and mining workers. Without providing that the applicant meet this obligation, the DEIS essentially forces the County to assume the entire financial risk and burden of investing now in the creation of housing, infrastructure, and public services to be available when project construction begins.

Disposition: Other (SEE RESPONSE)

Response

CC-127- Socioeconomic Impacts to Eureka County

Letter 803, Comment 17

The County understands that BLM denies responsibility for addressing this impact as assertedly beyond its duty "to prevent unnecessary or undue degradation of public lands." See 43 U.S.C. § 1732(b). The DEIS must recognize, however, that failure to provide adequate housing for mine workers will inherently and unnecessarily degrade the public domain, by producing unsanitary and unsupervised encampments of these workers as trespassers on federal lands. The County and applicant have agreed that worker housing should not be provided at the mine site by the mine operator, but instead be sponsored by the County within the Eureka town community. The County needs BLM in its EIS to assert its authority to require the mine proponent to underwrite this County effort (in addition to others currently underway). Mere assertions that various beneficial impacts will flow to Eureka County as a result of the mine provide scant assurance that near-term problems will be adequately addressed.

Disposition: Other (SEE RESPONSE)

Response

CC-127- Socioeconomic Impacts to Eureka County