

Response

The analysis in the DEIS is based on the best available data. NEPA does not require an economic analysis for every alternative, however, a socioeconomic analysis of the potential impacts resulting from the alternatives is provided in Sections 3.17.3.4 through 3.17.3.7. Even the fact that the detailed socioeconomic analysis for the Proposed Action covers the first ten years of the operation, details assessment of all the socioeconomic effects over the year the alternatives, particularly the Slower, Longer Project Alternative and the Partial Backfill Alternative would be speculative and not feasible.

Letter 868, Comment 6

I strongly recommend the Proposed Action with my modifications of: backfill. off-site processing and longer project alternative.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 869

Comment 1

My name is Betsy Barker and I agree with General Moly. I think that change is a good thing and we don't need to stop it. Everyone profits from it so they just need to do it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 870

Comment 1

My name is Mat Wong and I want the mine to go in because I'm tired of seeing all my friends' kids have to leave the valley to find work. And I really believe that most the hold up from the farmers is over just over greed. Because I've heard them sit and talk about I sit through their meeting or through their little chats and they want bought out because they don't want to be like the rest of us and have to earn their retirement and sell out. That's all I have to say.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 871

Comment 1

My name is Ronald Woodworth. And basically I want it to go in. It's ridiculous that they're fighting this. All the studies have been done and approved and they've got the water rights. I'm tired of about all I can do any more is operate equipment. And for the farmers it's part time through the summer and then you starve all winter. It's about time there's good job opportunities showed up down here. Give a chance for the town to grow. And that's basically it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 872

Comment 1

Bob Dinwiddie and I'm for Mount Hope. I think we need the jobs. They have 400 jobs in something like a 40 year mine life. I think it would be good for the community and good for the economy of the United States.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 873

Comment 1

I'm Bobbie Dinwiddie and I believe in a job that supports three or four generations of family where that our grandchildren don't leave the community our children and grandchildren don't leave the community; they're still here when our old folks need their family around them. I appreciate the idea of a long term job and real money, even though it's too late to do me much good. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 874

Comment 1

Mike Laughlin. Well, I'm in support of General Moly, as long as it's done correctly and it doesn't disrupt this whole community and the area and end up with Walmart down the street here that we don't get I mean, like it is in Elko where you can't drive down the street and the crime and the boomers and the people that follow this trade. This is pretty dangerous stuff, these kind of people coming into our community like this.

And I'm not too sure about the man camp being set up next to the housing development up there. I don't know if that's the right way to go or not. Other than that, if it's going to go, it's probably going to go.

Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 875

Comment 1

James Eaton. I want the mine to come in. You know, it's just I've been mining for probably 20 years, you know, from gold mining to coal mining to uranium mining in Colorado. It needs to come. You know, it needs to be here. It just has to come in, you know. It would be good for everybody. You know, I see the farmers' point of view, you know, we need hay for the cows that we eat. But we need minerals, too. The mining, you know, we can't live without it. So that's about all I got to say.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 876

Comment 1

My name is Richard Landers. I'm a retired guy, but I'm not ready to retire yet. My wife and I specifically moved to Nevada because we liked the wide open spaces and the business friendly climate. I would like to try to open a machine shop here, which even if this mine doesn't go through I think there's probably good opportunity for such a shop. But if the mine does go through they're absolutely going to need a machine shop here, period. There's no choice about it.

I've got quite a few decades of experience working in a shop like that or supervising workers. I just don't feel like kicking back and taking it easy retiring when I could be generating money. And I'm anxious to see this mine come, come to happen if as long as everybody is kept happy with the water rights thing, because I would like to see us generating money instead of just using it up here. I don't know what else to say. I guess even the balance of payments sort of thing between nations, you know, this in its own little way is affecting that, in my opinion, and that we're making a product here instead of just using up money from somewhere else. So I hope it happens.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 877

Comment 1

My name is PJ Benet Davis.

I am here because my dad passed away and he ran the one of the RV parks up here for 40 years. And it's mine now and I want to make it it has to be completely redone, but I want to make it a viable business here. And I'm appalled, really, at the problems that we're encountering with getting this mine going because mining is this county's life.

And I feel that if they don't let it go through, they're denying us something that they're going to take anyway later on, whether we want to do it or not. They're offering us choices now and they're not they may not offer us choices in the future. I would like to have let them have a chance to do something about this mine because I don't see any reason not to. That sounds dumb, erase that. I know you can.

I think I want this mine to come through because it would be beneficial, especially this time in America's history, because we're not getting anywhere. We need the jobs. We need the minerals. And if there's a lot of ranchers, I understand their plight, but some of them have been using way too much water for way too many years. I just feel that it's something we need right now. Not in the future, now. That's not really what I want to say at all, but that's what you're going to get.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 878

Comment 1

My name is Jean Fierro and I am the owner of Red Lodge Paralegal Services and I am the paralegal. What I'd like to say is that I completely support the Mount Hope project. I think that is the best thing for this area, this town, the community as a whole for jobs, for growth, and for numerous types of amenities that would be brought into this town.

Right now the way things look, there's nothing here. And businesses are folding every day left and right. My business, I actually service five counties. And I can pick up my business and leave. But a lot of other people, they just can't do that. As far as growth potential in this town, their just isn't any. Very few services. I mean, we're out in the middle of nowhere. And families are not going to move here. This is not going to be a family community. And if the commissioners and the people of this town are worried about, for example, crime, well, they're not going to have to worry too much longer because that's all that's going to be here if the only ones that come here are the single miners and the only thing they have to do is drink.

The other thing is that I think that the ranchers and the farmers I know they're concerned about their livelihood, but as business owners we are equally as concerned about our livelihood. So I am totally behind it. I think the water issue seems to be forefront right now is kind of interesting considering that there has been so much use of water out there in those valleys. I have not been aware of anyone addressing that before now. Not at least until another mine or that mine came in.

So now I am totally for this project. I back it all the way. I sent a letter to the BLM and I just want to make sure that this goes on the record.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 879

Comment 1

Anthony J. Rowley, and I'm for General Moly. I think we need the businesses and the jobs. It will help our community.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 879, Comment 2

I've had 10 or 15 people ask me to provide them a job and they couldn't get a job and even left the community. So that's what I think. I think it's a good thing. I want to see everybody taken care of and I want to see I don't want them to suck all the water out of the farmers either. But I think we need both things to be litigated out and on an even keel. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 880

Comment 1

Mary Zunino. I'm a small business owner and I'm very much in favor of the Moly project. I've looked at all the water tables and how it's going to impact the environment. I see no problem with that. I think it would be great for our community. We need more people in town so that we can get more services in town. And very much in favor of them. I think they're a good company, willing to stay here and contribute to the community.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 881

Comment 1

Lawrence Mohler. As a small business owner and long time resident here, we've been hoping that they would finalize this project and get going. We're fully behind the project with the idea that it's going to help the community and improve the situation here, small business wise and general living conditions. So that's our stand. We're fully behind them. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 882

Comment 1

My name is Nancy Gray and I'm the human resources coordinator for General Moly and I'm strongly in support of the Mount Hope project. It will bring career opportunities and growth for Eureka and the surrounding area. For me personally, it will mean a career opportunity to participate in developing a first class mine and give me the opportunity to help create a work force that is skilled and has a long term future.

And I'm excited to be a part of that. And I'm also proud to work for a company that shows great environmental stewardship and leadership in the community and willingness to partner with Eureka, as well as the nearby county. And I'm also excited about the high paying job opportunities and generous benefit package that goes with it, for me personally and for those that work for our company.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 883

Comment 1

My name is Lisa Bennett. I'm a consultant for General Moly. I'm for the project. Personally it impacts me with a career opportunity, but it also will, you know, provide Eureka with 400 jobs over a course of 40 years and donations and support of the company for the community.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 884

Comment 1

The name is Bernard Pacheco and I do work for General Moly. And I support the project, obviously. But Eureka, you know, I've been involved in the mining industry and I've seen what what the development can do if it's done cooperatively with between the

communities and the mining organization. And it gives you a great opportunity to keep your town from dying out here. The kids that are raised here, go to school here, have an opportunity with some some high level positions with the mine. And it would help keep the city in tact and moving forward. So I would recommend the support of the project

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 885

Comment 1

I had some remarks as to the EIS person. As far as they it's salt desert shrub community. They say it the "salt desert scrub." It's not. It's supposed to be shrub. And "scrub," it's throughout the document.

Disposition: Comment acknowledged; does not provide new information

Response

CC-101-Salt Desert Scrublands

Letter 885, Comment 2

And I also would like to ask when they talk about the phreatophyte vegetation and when that is harmed and they say that the BLM will provide appropriate seed mix, I would like I think it would be smart if they grow or wise if they know what that seed mix would be, because I would like to know myself. I don't know that there's a seed mix available that's going to replace such a fragile environment if that plant community is lost.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 886

Comment 1

Gerey Dillinger. I am in support of the project. I believe it's a project that could revitalize Nevada and America. It's a very exciting project that could create a lot of good jobs, safe jobs for the American people. I think the impact that it could have on the local economies and the tax base due to the royalties is huge, resulting in, you know, good programs, education. And I believe these mining companies are good stewards of the community and of the industry.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 887

Comment 1

Mike Lortie. I propose this project to go. It's a positive thing for the whole community. Eureka both counties, Eureka County, Elko County, the whole Nevada. I think it will be great for all the people there and also for all the mining suppliers, create more jobs for everybody. And with the 400 people that will be coming here to the mine, also that will be great for the economy and boost this whole area.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 888

Comment 1

John McMahan. I think for the mine coming in, this Mount Hope, I think they deserve a fair shot at it and it will bring more jobs to the community, more economy, more town growth, and bring more and again, bring more jobs, which is very, you know, places people right now are hurting. They're getting laid off. They have the don't have the opportunity to work. I think this will be a golden

opportunity to bring more jobs and, you know, more town growth. And I think this mine would really do that, you know, really boost this town and maybe the economy and everything else.

I just think it's a great thing for the community and for the economy to produce and bring Eureka along. Good for the school districts, maybe we'll have some great things happen; football team, wrestling team, and get baseball back again. I really don't think that it's going to inlfuctuate and bring a lot of riffraff into this company or into this county. So I think it's going to make Eureka a very rich county still and bring some good things along. So I enjoy living here.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 889

Comment 1

Nate Garner. I would like to say I believe General Moly has put a lot of time, effort, and money into studying the water and the other issues in the environmental impact statement. And I believe it's time to get the jobs going in this community.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 890

Comment 1

Richard Carlgren. But my feelings on the Moly project is I feel it should go through. Mainly for the state and for the county, benefits the county and the state. I think there's a little bit of too much, what are you going to do for me? I mean, I've talked to people. It's kind of like, I want. And it's, like, groups. And they all want something. And I think some of the demands that they're they want from General Moly, you know, that's not their they're in the mining business. They're not in this other stuff.

But mainly I'm for it. I think it will be good for taxes and I think it will be good for the young people having someplace to go, once they want to start a family and stay in the area.

The water situation, I guess I'm not really maybe cognizant of everything about it, but I think that's another me, me, me. You know, before Moly even came they were over, you know, adding pivot after pivot after pivot. They were draining the stuff down themselves before Moly was even involved. And they're hardly going to be taking any or just a little bit of water from them. But I'm for it. I know a lot of people that are for it. And I hope it comes through. I think it's going to be beneficial for the area, beneficial for the state.

I just want to see this thing go. I'm just tired of people dragging their heels on it. But I've been for this ever since I moved here. I moved here in '08. April of '08. I just want to see it go. We could sure use it. The town needs the economy, believe me. I just wish they'd quit dragging their heels, the county commission. It kind of kills me. But I just want to see it go. All for it.

I grew up with Michael, he's just a few years younger than me, but I just want to see the town needs to grow. I moved here to retire and that's I want to stay here and I'd like to see another store or two, another station. Like I said, we need the economy here. We do. I love this turn out. This is biggest one I've seen yet.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 891

Comment 1

I'm Roger Osmun with Southwest Energy. I am for the Mount Hope project. I've been watching this; the potential startup of the project over the last few years. I believe it would be extremely good for the county of Eureka and the and the residents of Eureka to get this project started.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 892

Comment 1

Deon Reynolds. I just wanted to video tape my support for General Moly and just say it's time to hire some folks and let's get going. I'm tired of our commissioners going for a few people that they're trying to protect and not the whole group of people that live here.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 893

Comment 1

Dustin Weidler. I'm for the project. That's all I have to say I guess.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 894

Comment 1

Steve Cook with Southwest Energy. I hope that we don't run into too much opposition. I hope we get her going through because I think it will be a good thing.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 895

Comment 1

I'm Cody Dalton. I work for Southwest Energy and I hope this project goes through, just for future jobs and hope to support my family in the future with a huge mine like this property has. And that's it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 896

Comment 1

Val Sawyer. And I support the project. I think that this development can be completed in a very socially and environmentally sound manner as it proceeds along and I think there's safeguards that will allow people to monitor the potential impact that might occur.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 897

Comment 1

My name is Donald Heuser. I'm here to promote the Mount Hope project. I believe that we can balance the mining industry, as well as the needs of the public and the concerns of the ranchers here. The mining industry has come a long ways here in the last 20 to 30 years as far as balancing the people, plant, the earth and the environment and making sure that the environmental concerns are adhered to

from a from the public, as well as the government regulations as well. So, I'm a believer in it. And Eureka needs it. We need it. We need it as a country. Put people back to work if they want to work.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 898

Comment 1

Thank you. Zach Spencer, General Moly. The Bureau of Land Management's mission is to sustain the health, productivity and diversity of America's public lands for the use and enjoyment of present and future generations.

This is important because 95 percent of the Mount Hope project is located on public land, managed by you, the BLM. The draft EIS on Mount Hope follows your mission. As the draft EIS illustrates, the Mount Hope Project has the following environmental aspects: No endangered species. No wetlands. No sacred American sites. No cyanide or other toxic chemicals. Minimal pit dewatering. Good water quality and post mining pit lake. Minimal land disturbance for new infrastructure.

With regard to productivity in your draft EIS, the Mount Hope project has several benefits including creating hundreds of high equality jobs, substantial tax revenue generation and a long life.

Finally, the diversity of the Mount Hope project offers this part of central Nevada a very promising future. Our family will be able to work here, recreate here and live here for many generations. Essentially, this draft EIS shows that the Mount Hope project complies with the BLM's mission statement and that this project is good for our community. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 899

Comment 1

Good evening. My name is Larson Bills, not Bill Larson. But I'm a Western Shoshone from South Fork area and our people have lived there for quite a while before it was a reservation. And also there's many other people here from other reservations under Shoshone. And I think the main thing I'd like to say to everybody is that, you know, the United States had made a treaty with us and that treaty is still there. And that treaty was a piece of finish up. That means we also have to share the land, not own it, you know, and take care of it.

And what we see as tribal people is that we're we're pretty much against mining, not as mining itself but, you know, the way it's done. I'm sure it could be done responsibly. You know, that means with the earth and with the communities it could be done responsibly. And one major thing I'd like to say that, you know, there's four elements that our people have lived by for thousands and thousands of years, four sacred elements: That's land, air, water and sun. You know, those are people are calling those resources. They are the source. And with one of those gone, we all die. Everything dies, which is one those items gone. I guess I'm here just to say that, you know, as people of Nevada and ranchers, you know, water is a sacred thing that keeps us all alive and animals. We need to look at that real carefully when all this mining activity is going on because I think we're being left out. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 900

Comment 1

My name is Trish Reynolds. And I welcome the General Moly Mount Hope project to our community. As downtown business owners, we appreciate the business that they bring to us. Their support of our business has allowed us to expand the range of services that we can offer to this community. If General Moly is not allowed to open this mine, the town of Eureka will continue its slow decline and its ability to attract full time, long term residents will diminish.

I served as economic program senior assistant for years and I understand the socioeconomic benefits General Moly brings to our remote community. Virtually all businesses will benefit and grow from General Moly's mine. Considering the current tough economic times, the influx of jobs and the tax revenue generated by this mine will elevate not only our community but the entire state of Nevada. I urge the BLM to allow this mine to open and to realize what is best for the majority instead of just the few. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 901

Comment 1

Jared Fitzwater. Keep it short and sweet. I was given permission by a representative from the 3F Ranch to, I guess, put on record that General Moly has been more than fair, up front and honest with us and our dealings with them. We've been happy with them. And as far as General Moly coming to town, I have the feeling that it's going to provide a lot of positive impact to the local businesses, myself included. And I guess that's all I have to say. I'm for the mine.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 902

Comment 1

This is pretty much a letter that I had written to BLM but I wanted to have a chance to read it tonight. We have had the opportunity to interact with General Moly and its employees for six years here in Eureka. We are business owners and have been in the community since the 1960s. We have seen the upturn and downturns in Eureka's economy firsthand. Because we have not depended on a county or state job for a livelihood, we are perhaps more keenly interested in General Moly's presence here.

General Moly has been very active in the community as a whole, as well as in the business sector. They have sponsored many events for the community, as well as donated to many community programs, many of them for our children. They have shown a real commitment to our community and to keeping the community informed of their plans. The doors to their downtown office are always open and the opportunity to learn about their business plan is always there.

We feel that General Moly has been and will continue to be a very positive influence in our community. The jobs that will be created will be such a positive thing for Eureka and the whole state. Jobs in this time are extremely important and the taxes derived for both county and state will be very beneficial.

We feel it is well past time for our Eureka County commissioners to stop impeding and start working with General Moly in a positive way. Everyone has spent perhaps too much time on legal fees and appeals. It seems that the BLM and the State engineer give credibility to General Moly's research and statements. In my opinion, it's time for all of us to get behind this project and realize the benefits. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 903

Comment 1

My name is Bob Burnham. I'm on the committee, but tonight I'm speaking basically as a member of the school board. And the district has had some concerns about methodology of developing impact numbers all along. And we still have some serious concerns about that, not that we can't adopt to whatever population comes in here, but methodology of developing those numbers, quite a few of us think is still flawed.

The Environmental Impact Statement has said that in existing terms, 23 percent of local population is school children and the for some reason say only 16 percent of the influx would be school children, which several of us think, if anything, it should actually be a bigger number than what the existing situation is because General Moly isn't bringing in any retirees and the existing data includes retirees in the town. So, theres still a lot of concern as far as impact on schools, the problems that we've brought up with methodology still exists.

Disposition: Already addressed in planning documents

Response

CC-066-Impacts to Schools in Eureka

Letter 904

Comment 1

Yeah, hi, my name is Steve Drimmer. I think most of you know who I am. But our family has owned the land that consists of the Mount Hope property for the last 44 years continuously and I think we've been consistent continuous tax payers in the community. We've dealt with several mining companies over the years. I've dealt with every single one of them myself. Sorry to say, I'm old enough to be able to say that. And our experience with General Moly has been nothing but terrific. They've been honorable, decent to work with.

They're the first company that we felt sure was committed to the actual mining of the property. You know, you can talk about the disappointments of the past when well meaning companies would come and not actually mine the property. Nobody was more disappointed than we, of course. And I can assure you the reason we made the deal we did seven years ago with General Moly is because we really believe in their commitment to mine the property, which is something we wanted very badly.

The last time I was here was three years ago, I think it was, where our family joined with General Moly to create a one million dollar conservatorship fund for Eureka County High School opportunities. And, you know, when I came to Bruce Hansen who is the CEO of General Moly and approached him and told him this was an idea that we had, he willingly joined, and without any hesitation and delay, and helped facilitate this and actually is contributing half the money along with my family. So I have seen firsthand the demonstration of the commitment to the community from General Moly. So I believe what these other people are saying, that we have no fears that they will be a very, very good corporate citizen and very good for the community and the county. Thank you very much.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 905

Comment 1

Hello, my name is Eric Williams. I'm out of town, I'll be brief because it's far more important for you folks that live here to get more time. I'm from Spokane, Washington. I'm a consultant to General Moly. I just want to make a few points for you. First of all, I love coming here. This a great place. You should be proud of this community. The civil discourse is wonderful. I love staying in your hotels. I love eating at your restaurants. It's a wonderful place to visit.

That's largely because I grew up in the same small town in Montana right in the center of the state. When I graduated from high school, there was about 24 kids in high school. Now, there's about eight in each class, as many as in my graduating class. Now seven or eight kids. So I'm a little jealous of you all. As a former ranch kid, I can understand the growers' concerns, but I'm a little jealous because you all have an opportunity that the community I grew up in doesn't.

So, finally, I just want to also commend the BLM. I'm one of the rare people that actually reads a lot of EISs and I think the BLM has done a really commendable job with it. Thank you so much.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 906

Comment 1

Where Eureka draws its water now is out of Diamond Valley and the water tail there is going down. It's a very big concern for the irrigators here who have done a fantastic job of water conservation, but there still is a challenge. I think that that challenge needs to be addressed. It's hard for me to understand how the State engineer could grant water in an area where they've already allocated water. It's hard for me to understand why the BLM would be behind giving out and participating in the approval of another industry that would take water in an already depleted area. So that's a big concern and I think it needs to be addressed.

Disposition: Other (SEE RESPONSE)

Response

The NDWR has granted EML their water rights for the Project. Section 3.2 of the FEIS analyzes the potential impacts to water resources from the implementation of the Proposed Action.

Letter 906, Comment 2

And it needs to be addressed fairly and it needs to be mitigated fairly. If somebody is going to come in and use that resource that's already lacking, there needs to be compensation for that.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 906, Comment 3

My next challenge is with water quality. I don't know that there's been enough research going into where that settling pond is going to be, how stable the ground is there, earthquakes. There's going to be a lot of very toxic material go into that pond, as I understand it. It's going to be a huge pond and what if there is a breach in that lining and it goes into the ground? It's going to contaminate the water quality under ground.

Disposition: Comment acknowledged; does not provide new information

Response

CC-077-Water Quality Associated with Storage Pond

Letter 906, Comment 4

My third issue is air quality. Most the people in Eureka have been around mining all of their lives and they've been able to enjoy a clean air facility. They've never had a roaster going on and pollution going into the air like this mine is proposing to do. So I'm just very concerned that in ten years from now we're going to wake up and it's going to look like Los Angeles, basically, down in that valley. So I think that needs to be addressed.

Disposition: Already addressed in planning documents

Response

CC-112-Potential Impacts to Air Quality

Letter 906, Comment 5

You know, I'm not against mining. Half my family members are miners. They make their living doing that.

Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 906, Comment 6

I'm just very concerned that we're all the talk about the jobs, that we're going to ruin a lot of agriculture jobs, rancher jobs.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 906, Comment 7

What the people in Eureka's water availability is going to be.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 906, Comment 8

So I think all those needs to be dealt with in a little better manner than it has been up to this point. I appreciate your time. Thanks.

Disposition: Comment acknowledged; does not provide new information

Response

CC-024-General Comments with No Specified Actions

Letter 907

Comment 1

in addition to the substantial adverse impacts to private property

Disposition: Comment acknowledged; does not provide new information

Response

CC-093-Private Property Impacted by the Project

Letter 907, Comment 2

air quality, water resources and recreation, including fishing on Roberts Creek.

Disposition: Already addressed in planning documents

Response

CC-064-Scope/Scale of Impacts in EIS

Letter 907, Comment 3

The social disruption and fiscal impacts for a project that will likely double the population of southern Eureka County are certain and will have far reaching effects

Disposition: Already addressed in planning documents

Response

CC-067-Socioeconomic Impacts

Letter 907, Comment 4

We continue to assert that the document has many places in it that are in direct conflict with Eureka County plans, goals and policies. We understand there's going to be some level of impact inherent with any plan, but it's the large scale and the scope of this project that our end are at conflict with our goals and policies.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-025-Eureka County Plan Consistency

Letter 907, Comment 5

The mitigation measures spelled out in EIS are too vague and contingent. They've not been carefully analyzed. I'm going to give one example here of the many. One of the proposed mitigation measures is to install a pipeline from the Kobeh Valley Well field to the waters of Henderson Creek in Pine Valley which is an interbasin transfer to provide a source of water to augment flow of the stream.

We believe this is simply a shell game of creating a new, imaginary water source, and analyses do not go far enough to talk about the ancillary impacts from that. One of the main issues is that that mitigation would require Nevada State engineer a lot of work. There's no guarantee that the water rights or the water itself, regardless of the right, will be available for mitigation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 907, Comment 6

But we have been working very hard to engage the mine to work with us to address the housing, fiscal impacts and fiscal infrastructure in impact. It's these impacts to be secondary in the draft EIS and we believe that needs to be addressed.

Disposition: Already addressed in planning documents

Response

CC-067-Socioeconomic Impacts

Letter 907, Comment 7

There's still outstanding issues with air quality. We're happy to learn that the BLM is addressing a new federal standard.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 908

Comment 1

the county still asserts that the use of a ten foot draw down contour as a measure of environmental impacts is too great and we do not accept the rationale provided in the draft EIS that tries to justify a ten foot draw down contour as measure of potential impact of water

Disposition: Comment acknowledged; does not provide new information resources and water dependent resources.

Response

CC-023-Ten-Foot Drawdown Contour

Letter 908, Comment 2

Another example of de emphasizing potential impacts illustrated by the discussion in the draft EIS and headwaters of Henderson Creek where it was asserted the geological structures made produce that reduce the potential draw down in this area and the effect of the creek. There is no evidence that such geologic structures exist.

Disposition: Comment acknowledged; does not provide new information

Response

Geologic structural complexity in the Roberts Mountains is well documented. Montgomery et al (2010) provides details on these features. No changes to the text of the EIS have been made to address this comment.

Letter 908, Comment 3

The need for regular NEPA regulations also require that the environmental consequences of the EIS shall include discussions between the proposed actions and federal act regional lands use plans, policies, controls for the area concerned. Unfortunately, the there are decree water resources incorporated headwaters of Henderson Creek and the draft EIS do not include a to BLM were to define consistencies between proposed action and the decree.

In contrast, BLM states that these decreed rights can be impacted as long as they are mitigated, which undermine the decree which holds the force of lot. Specifically, table 3.29 and similar tables which gives sensational flow for mitigation. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-009-Water Rights

Letter 909

Comment 1

Hello, my name is Scott Raine. I'm a business owner here, fifth generation, of Eureka, Nevada. My particular family, at least that I know of, I'm also a on the Nevada Board of Wildlife Commissioners, it's not been brought up by them, although in that I have specifically reviewed the portion about wildlife and I found that existing mitigation within the draft EIS more than sufficient within that.

If although, like I say, it has not been brought up by that body, simply my own suppositions there. I know there's a lot of every project everybody does is going to have a few negative impacts. I like to turn on the light switch as much as the next guy, a car made out of exotic materials, and this mine will have minimal impacts.

As far as what I've read in the Environmental Impact Statement is sufficient in comparison to many other projects. It's necessary to develop the land. Over the years I've wandered the land where this mine is going to be. Yeah, there's going to be a hole in the ground. But once again, I think it's sufficient. There's sufficient mitigation within that.

As far as the business aspect, clearly it will have a positive impact. We've had but then again every group here has had very positive impacts. Ranchers has been amazing over the years. Kept us alive when the mines have gone. But this mine, it will have a great positive impact. It's got to. There's no other way about this for a business impact in the community. And it will be tough. It will be a huge change. But change is coming whether it's this mine, or the next, or the next project down the street. And we can handle it. So there is no I think it's sufficient what is in the document. I don't think we need to go spend another \$3 million looking at the socioeconomic impacts, as far as that goes. You know, the water issue, it's severely you know, it's a State water engineer and they're the experts on that. You know, that's a whole other argument. I've seen that document was sufficient, what is in that document is probably sufficient on that. Leave it up to the State water engineer, it's what they do for a living. It's another argument for another day.

I think the community can withstand this impact. It's change. I like change. But it's probably good for the community overall and that's the way it is.

Thank you very much for your time.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 910

Comment 1

Hello, my name is Lennie Boteilho and I'm here in a couple of capacities: One for myself and one for the company I work for. I grew up in this area. Grew up in Ely. I spent a lot of time in Eureka. It's a great open area. As kids growing up we enjoyed it and it's a great place for families to continue to raise their children and schools.

I've reviewed the EIS. It's quite extensive. My background is environmental and that's my primary role at the company I work with. And looking at the EIS, I think they've done a great job with all the experts and expertise that's gone into this document. The analyses have been in depth. They've done a good job at looking at all the ways to analyze things.

There's a lot of technology out there. And technology grows every year. And as that continues to grow, you learn more as you go along. The monitoring program, the mitigation plans that they have set in the EIS monitoring programs, they will continue to build on what has been analyzed, what has been projected. And as those monitoring programs go on, with any mine or any kind of development they're going to be able to see the trends that are going on and be able to mitigate things quick enough, or reasonably quick enough, so it does not create a long term impact that's non repairable.

The mine industry has done a fantastic job in the last couple decades with reclamation remediation. I've been involved with many aspects of that in Nevada and around the world, worked abroad, and I will tell you, Nevada does a great job with those things. And I think the Eureka Moly group has done a very good job with the consultants and their team of analyzing those things and putting the right protocols in place, and how they're going to implement the project and make it prosperous and long term and use of the public lands the way they need to be and leave them the way they need to be for future generations.

The other half of my job, I'm I am a senior manager with Ames Construction. And that will bring a lot of jobs for the construction industry here, along with the mining. We do mining. We do construction. We build big projects in Nevada. We've been here for 23 years. We don't plan to leave. And Mount Hope is a big job and we'll be a part of that job. We're proud of that and we were proud of all the other jobs that we're involved with in this state. And we look to continue to be here for a long time. So we're in support of the proposed action as its written and hopefully the BLM will be able to wrap this thing up so we can move on. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 911

Comment 1

I'm Mike Innacchione, General Manager, Mount Hope project. As general manager of the project, I would like to assure everyone that we are committed in mining done right. We will incorporate the highest standards regarding all facets of our business, especially safety and environment. We generally want to be partners with all our stakeholders. I am fortunate to have joined a company that has already demonstrated commitment with scholarships, community projects, and donations.

I believe that the mitigation for all of the impacts associated with the project is properly addressed. Just one example includes the steps we take to ensure that water is protected, as outlined on pages 3 86 through 3 100 of the document. This is just one example of how the BLM and the cooperative agencies have put together a solid document that addresses the environment and socioeconomic concerns.

Nevada currently faces the largest unemployment rate in the country. The Mount Hope project will provide high paying jobs to aid an ailing economy. We will benefit the community, Nevada, and the United States by developing the Mount Hope project. Let's proceed with the BLM's preferred alternative. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 912

Comment 1

About 112 years ago my grandfather set foot in this country for the first time. And since then, my family, both my mother's and father's side of the family have made their living through the earth, whether it be through mining, livestock, or agriculture. I'm satisfied with what I've seen with the BLM, that they have done a very responsible job with what they've done.

On a personal note, some of the people from General Moly have involved me with some of their environmental issues and some of the equipment. I can tell you the bottom line from all of them was, we want to do the right thing. I hear that on a personal business, not on a business basis. I know some of the people from General Moly from other venues have previous business with them and they've already wanted to do the right thing. I'm satisfied with this property that they want to do the right thing.

Going forward, I think it's a legacy they can leave this county and this area of Nevada with something that our children and our children's children will be proud of. So for that reason I'm in definite support of General Moly. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 913

Comment 1

My name is Ken Conley. I am managing member of Conley Land and Livestock. My family, my I raised three kids in this area. A few years ago we started Land and Livestock here in Eureka of which my son and my daughter in law are part owners as well, along with my wife. And they have a son, and I want to see him continue with what we've tried to get started here.

I never take this hat off whenever I go into the public because I don't think there's enough of us left any more and really believe, I encourage everyone, I come from a mining background as well and I don't think anybody wants to see this thing get squashed. But I encourage any of you that come up here and want to show support or your nonsupport, read the document.

If you're concerned about the traffic levels on Highway 278 at the current levels or what they will be, if you're concerned about the air quality, if you're concerned about the future of farming and ranching in this community, if you're concerned about recreation, please, read the document. You're looking at one person who is not satisfied with the document the way it is right now and I think we need to continue to work on it. Please, you have 45 days left to make these comments. So don't pass up that opportunity. I beg of you. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-022-General Opposition to the Project

Letter 914

Comment 1

Hello, my name is Kevin Conley. I'm employed with General Moly. I just wanted to say that I've been in mining for over 33 years. I've been in environmental profession for 20 plus years. One of the great things that I've come across is working with this company. I really am a firm believer in the environmental group that we've put together. It's a very solid group. The company I work for is a very solid company, very supportive of the environment, not only environmentally but also safety. I really appreciate BLM's hard work on this document. I think it's a very solid document and I appreciate everyone's work. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 915

Comment 1

Good evening, my name is Fred Zumwelt. I just joined the General Moly and I'm proud to be here and support the Mount Hope mine and the BLM preferred alternative. For the last five years I've been working in Latin America. While it was a wonderful experience, I'm tired of seeing the good jobs going overseas and hear others say, we need more service industries. You can't support, educate and provide for your family on the phrase, "Would you like fries with that?" America needs good jobs that pay real competitive wages that have medical benefits and saving plans for the retirement, especially in small towns. It's important that our youth have opportunities to work where they were raised and not forced to leave to find employment.

Mining provides opportunity for us now, for our children, and it's good for our nation. It's long term commitment to the community and the people that live here. We're your neighbors. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 916

Comment 1

Hi, I'm Sarge Warrick, I'm the safety manager for General Moly. I'm a Nevada boy. Graduated from Tonopah High School, 1973. Yeah.

I worked with General Moly over the past five years overseeing the safety program in the development of this project and the project near Tonopah. I want to assure you of our high value to safety. During the past five years we have had numerous drilling programs and employed many contractors and consultants. During one period of work between the two properties we had 84 people working. So we have a history of work that's been accomplished and safety activity going above and beyond what's been required of us is the way we've operated.

But we were not required to live by MSHA, Mine Safety and Health Administration, however, we have followed their regulations thoroughly and completely. And this is the attitude that will serve this community well. We're developing a working culture with a caring attitude and a safe operation that will spill into the community. What we do will affect you and we're going to affect you in a very good way.

As an example of this positive effect on the community, nearly all of our current employees are first aid and CPR trained. Going forward, we will continue to add emergency medical trained personnel, mine rescue personnel. We'll have an ambulance on site and our current Emergency Response Plan will continue to evolve so that we can assist the community as needed.

I'm proud to let you know right now that as we begin the new year, we closed last year with zero accidents. I support Eureka Moly and I believe that this company's safety and health commitment will, through training and leadership practices, create a sustainable benefit to the community, to the county, and to the state. I call on all of you who feel the same way as I do, who want good, safe, reliable work, to come forward and make a positive comment to the BLM concerning this document. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 917

Comment 1

Good evening. Annette George Harris with the Department of Tribal Counsel. I am the vice chair for the counsel. On behalf of the tribal counsel, the Duckwater Tribe is in support of General Moly and we want to just thank General Moly for beginning a partnership and a relationship, not only with us, but I see the community as well of Eureka County.

I am a graduate of Eureka High School, as well as my three siblings, and my father retired here at the state highway. So I have a lot of concerns as far as making sure the natural resources are protected. I know that many of you are ranchers and I see that many of the ranchers' families are miners as well, as well as my family. The mining supports our families and I see that General Moly works with each of the individuals.

If you have concerns, General Moly is always willing, and like they said, the doors are open. If you have any questions and you want some concerns answered, they're there to try to work with us. And I believe they will continue to work with us. And I've seen the businesses over the years and I believe that this will be a huge improvement and I support the community, as well, in the stores.

Thanks.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 918

Comment 1

Good evening. I'm Todd Gilligan, general manager of Cashman Equipment Company, Nevada Cashman dealership. I stand here this evening to say our company's support of the draft EIS, the subsequent construction and the opening of Eureka Moly's Mount Hope project. Cashman Equipment Company takes pride in being one of our state's oldest businesses established in 1931 and just having celebrated our 80th anniversary of the family dealership.

Our reputation was built on providing high quality drill equipment that supports Nevada's mining industry, as well as Nevada's various construction industries. As a result, have a direct interest in ensuring that Nevada's overall economy recovers as quickly as possible providing support for our our company's more than 1600 employees, as well as countless families that are directly or indirectly connected to Nevada's mining community. We're all fortunate that mining in Nevada is currently a vibrant and thriving industry. We must also recognize that the mining industry is a key stakeholder in within our state for job creation, economic recovery and stability, and continuing community development.

We must continue to encourage and support the opening and reopening of mines, expansion of existing operations, as well as

responsible closure and reclamation of no longer feasible projects. The opening of the Mount Hope project should be considered one of our one of the many projects that are vital in the health and well being of our state and its constituents. Thank you for the opportunity this evening to show our support of General Moly.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 919

Comment 1

Hi. I'm John Colby. Anyway, Mount Hope has been pretty good to me. I mean, they I have some concerns about water and stuff. You know, they haven't pumped no water yet but yet they're helping me fix waters and I'm trying to fix before there ever is a problem and I think they've been very fair. They're willing to listen to you. You know, they're willing to work with you as long as you don't get super greedy. I think that they'll try to help you in any way they can. And I it's been real positive for me. But anyway, that's all I have to say.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 920

Comment 1

I'm Carrie Dubray. I currently work for General Moly. I'm a senior environmental coordinator for Mount Hope involved in the environmental permitting. I, too, am a graduate from Eureka High School. I also graduated from the University of Nevada Reno with my major in Resource Management and Resource Conservation. The mines provided me with an opportunity to return home to Eureka. I loved growing up here and graduated here. I want my kids to have the same opportunities that I did. It's great to be able to live in a rural setting and still be able to have the comfort of knowing that my daughter is in one of the best schools in the state, and I think in the western states. I'm pretty biased.

By moving back, I can definitely say it provided our oldest daughter with the level of education she needed in order to go on to college. I'm proud to say she is attending her second semester at Dixie State College in St. George, Utah, majoring in radiology. We would not have had the same opportunity had we not come home to Eureka.

Some folks here in the community are worrying about the demographic changing, kind of a glass half empty philosophy. If you look at it from the glass half full, you'll recognize that the mine is going to provide people currently residing in Eureka, and those who have had to leave to support their families, a means of staying or returning to Eureka. Just from the number of people who stopped me on the street or called me or stop in the office, I think the mine has an opportunity to hire at least 25 percent of its employees from people currently residing here in Eureka.

I know several recent Eureka graduates that would like love to move back home and work at Mount Hope and who are waiting somewhat impatiently for the mine to start up so that they may do so. The mine is going to create jobs, not only by direct employment, but there will be jobs created in supporting businesses as well. There is also the potential for individuals to begin their own businesses here in the community.

The contributions that the mine will be able to make to the community after its production will far outshine those it has already made so far. We are committed to the community and it's not the mine isn't just committed to its employees, we continue to coordinate with different groups within a community to develop long term working relationships for the benefit of everyone living here.

And I would just like to say as an employee, I am in support of our mine. I think we've done a fantastic job of assessing all of the concerns and we've put together a tremendous amount of support team and I'm in support of our project. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 921

Comment 1

Thank you for the opportunity to speak with you tonight. I'm Bruce Hansell. I'm the CEO of General Moly. And it's great to see everyone here for this event. We really do appreciate you coming out and providing input. This has been an exhaustive process analyzed this project has been analyzed and studied over the last five years.

I will I just want to say that we at General Moly are committed to doing mining done right; right by the community and right by the environment. To do that, we've invested so far on this project nearly \$200 million. That's not all in environmental studies. It's

significant land purchases, environmental studies, engineering work, and buying capital equipment in anticipation of this mine. Our partners, along with ourselves, will ultimately invest approximately another billion into the project to transform Mount Hope into a world class molybdenum mine and we're committed to developing it accordingly with the highest degree of standards. But to do so, we do need a record of decision. I want to compliment the BLM on the Draft Environmental Impact Statement that we're discussing tonight. I want to thank them for the hard work, and also the hard work of our employees and the expert consultants and the cooperating agencies and their input into the process as well.

I think we've developed a very strong plan for moving Mount Hope forward. We committed and we have submitted to those agencies the important information that's helped develop this draft EIS. And we know how hard the BLM has worked to make this. Because of the fine work, we've endorsed and clearly endorsed the BLM's plan as laid out in the draft EIS. And the preferred alternative requires that from the very beginning of mine construction through mining and reclamation, we take steps to ensure that the environment is protected and we mitigate impacts that are we first seek to minimize and then to mitigate.

In addition to what the BLM requires, we have said from the beginning we will mitigate impacts caused by us. That's mining done right and that's how we do business. The commitment is infused throughout our company from everything to hiring the best people to manning a strict safety culture in all our activities.

Thank you for your time. We're eager to get started to build this mine and eager to build our already great relationship with this community. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 922

Comment 1

I'm with Jacobsen Construction. I've been involved with a number of mining projects throughout the intermountain west. And one of the things that I can say is that the, the study that has been done by the BLM and others has been very thorough. I've been very it's been very positive as far as the study to mitigate potential issues and concerns for the natural resources, as well as for the socioeconomic impact. And so we are very supportive of this project and I'd like to see it come to fruition. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 923

Comment 1

Hello, I am Carri Wright, long time resident of Eureka and employee of General Moly. Growth in this community is essential to this sustainment by and survival of local businesses and the retention of young generations. Goods and service offered by current businesses are limited which will force the citizens to seek providers outside of Eureka. This limitation results in people seeking outside employment as well, since private sector employment is constrained by the reduction in local spending.

Employment, both primary and secondary is imperative to the development and diversity of the local business sector. As stated in the DEIS, the development of the mine would initiate the development of new businesses providing goods and services within our community, thereby resulting in additional job opportunities.

Admittedly, there is a potential increase in the amount of administrative, law enforcement, and emergency services supplied by Eureka County as pointed out in the DEIS. However, that increase also signifies the expansion of governmental job opportunities. Without an infusion of economic growth and jobs, our community will stagnate and die.

The benefits of the Mount Hope operation offer stability for the local economy, a broader range of employment opportunities, and a higher level of multi generation retention.

As a young citizen, lifetime resident and tax payer in Eureka County, as well as General Moly employee, I have a vested interest in the development and operation of the Mount Hope project. I am in support of the project and implore the BLM that General Moly is granted the permits necessary to implement to begin construction and operation of the Mount Hope mine.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 924

Comment 1

I'm with Q and D. Doug Elder in Reno, a construction company, and we totally support this project and look forward for it getting, you know, more people to work in Nevada. And whatever we can do to help the project, we've already talked with these people, and whatever experience we can help them with to get it off the ground, we're here. So, that's about it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 925

Comment 1

My name is Paul Heward, registered for this. I'm I think I'm pro the project. I think it is a positive for the area, both economically and for continued development. I think that there are obvious problems, environmental, for water and air quality, things like that. But I think that the project seems to have a very good team, very good group of designers that are mitigating these problems and have a good plan.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 925, Comment 2

My only concern would be that there's flexibility throughout the project to continue developing that mitigation.

Disposition: Comment acknowledged; does not provide new information

Response

Mitigation measures are listed throughout the EIS and will be implemented as deemed necessary by the BLM or other agencies, where applicable. The EIS and surface management regulations also provide provisions for adaptive management in instances where monitoring will be used to identify the presence and magnitude of additional impacts.

Letter 925, Comment 3

But overall, I think the project should be given the go, green flag and proceed. It's a benefit for the state for the state because it will help, I think, allow development of a resource that we need now a days that hopefully will reduce imports, but help us on the exports, as well as materials that we need within the country.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 926

Comment 1

My name is Don Smales, and I was a Eureka County resident for 27 years and I just want to say that I feel that this mine should be allowed to go. I know a lot of the people in the BLM and with the State Division of Water Resources and I trust their judgment. And I also know the environmental some of the environmental people with General Moly. I know the General Manager for General Moly and a lot of people that work there and I think they're good people. They're honest people and they wouldn't do anything to unduly damage the earth. They're good miners. They're responsible miners. And I think they should be trusted to do what they believe is right and I think that our economy certainly needs the mines.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 927

Comment 1

I'm Bart Hiatt. And I just want to speak in support of the project. I've looked over all the EIS information that I've seen and asked some questions. It appears to me that it would be good for the area, good for the state, and I think it would be long term, long term good thing for the state of Nevada. And I think the residents, as well. I think they've done a very good job in doing the study and I think the BLM has also done a terrific job putting everything together.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 928

Comment 1

The flow of some springs and streams may decline and it is given that certain springs will, in fact, cease to flow all together. Some of these impacts may not show up for decades and others may persist for hundreds of years after the project is history.

Disposition: Comment acknowledged; does not provide new information

Response

CC-007-Regional Hydrological Model

Letter 928, Comment 2

The document, again, this draft EIS, describes a plan to monitor water resources and water dependent resources to provide advanced warning of something bad happening. The county helped develop it consistent with the county's goal of helping the BLM and the mine do things right. Unfortunately, the draft EIS falls short in the ways it proposes to fix things that do go wrong.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 928, Comment 3

There are inconsistencies between the document and the BLM's own NEPA handbook.

Disposition: Other (SEE RESPONSE)

Response

The comment does not provide sufficient information to allow for an actionable response.

Letter 929

Comment 1

Thank you for the opportunity to speak tonight. My name is Bob Pennington. I'm the chief operating officer for General Moly. So I'm here obviously talking in support and in favor of the project. Before I came to the meeting tonight, I had an opportunity to meet with some of the residents of Crescent Valley. And I got to say, quite frankly, that I'm very impressed with the interest from Crescent Valley on this project. Interest to make sure we talk about all environmental impacts, and we've been thorough.

But the group I met with tonight are very supportive and I'm appreciative of their outstanding spirit and commitment to your community and we share in that commitment. I'll be brief tonight. But because, like the BLM, we at General Moly are also here to listen to what you have to say and are interested and want to address any concerns that you have about our project or any ways that we can find to prove our project, I want to emphasize a few key points.

First, I want to compliment the BLM and it's line of experts. They truly are. I have to stop and get off script here and say, you know, I read on the Internet that the BLM is one of the few federal agencies that fully fund themselves. Is that true?

And I like that kind of government work. But I want to compliment the BLM and they've done a very thorough job. They've taken the time, five years hard work to produce a very thorough, solid and defensible draft.

We, in turn, submitted quite a number of reports, somewhere around 24 baseline reports. And I hired equally professional consultants that examined our project in all aspects of environmental impact and visual, water, socioeconomic, air quality and all the requirements of the NEPA document.

Today is a very important milestone for us that BLM presents this plan to the public. It signifies in our mind that our project is moving forward. We're on the verge to get it into construction. We're hoping for a favorable decision. If we get a favorable decision sometime

later this year and before the end of the year, the banks will fund our project. They need a permit before they fund. And we'll move into construction.

And I've started engineering again in January. We shut it down for a couple years due to several delays, one of them being permitting. And we're moving the project forward.

I also want to talk about our commitment. You know, one way to demonstrate commitment is what we've invested into this, the Mount Hope mine today. We've invested close to \$200 million in purchasing equipment, funding studies, buying water rights, developing this project. We've got we've got a lot of our equipment stored at our Tonopah project, also in Nevada at Tonopah. We've got we've got our mills stored in Houston right now and in South Africa and Europe. We have transformers stored in Asia, ready to be shipped to our project once we have a favorable decision. So we've stepped forward and believe that this project is permissible and taking the risk to invest that kind of money in the hopes that it will be permitted.

In that \$200 million that we've spent, we've invested, just so you know, about \$30 million in permitting activities: That includes big water rights, drilling wells, pumping those wells, examining the hydraulic properties of the ground, and examining the pit area, examining the geochemistry of the long term pit lake waters and those sorts of things. It takes a tremendous effort and tremendous cost to put into thick of a report, 1500 pages, more or less, signifies \$30 million worth of work. Don't let anybody tell you it's inadequate or hasn't been done well. Took a lot of effort.

Sorry. We're going to bring about 400 good paying jobs to the county. We'll pay overall about 2.2 billion in taxes, significant from the socioeconomic standpoint.

Thank you very much.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 930

Comment 1

Hello, my name is John Curry. I'm a sales manager with Cashman Equipment, the dealer that covers Nevada. I'm actually out of Reno. I thought it was important enough to come from Reno in support of the Eureka Moly Mount Hope project because it this project is much more far reaching than just the local area here. It impacts those of us in Reno and beyond, throughout the State. We have a company that employs about 650 people. I would I would say that that's probably 600 families, and we're all supported mainly by the mining industry throughout Nevada.

We're one of the oldest companies in Nevada. So we've seen the booms and the busts in the mining industry. And I'd like to say throughout our dealings with Eureka Moly, throughout the years we've seen nothing but high responsibility, high integrity, and have no doubt that they will be the best stewards of the land that our great state of Nevada deserves.

So to make this short, I would I would encourage the BLM to not only, you know, approve this project, but continue continue to improve the responsible mining of the great resources that we have available here. Thank you very much.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 931

Comment 1

as currently proposed and analyzed in the draft EIS the mitigation framed to address adverse impacts falls short of being world class or done right

Disposition: Other (SEE RESPONSE)

Response

See the revised mitigation in Chapter 3 and Appendix D in the FEIS.

Letter 931, Comment 2

There are many aspects of the proposed action that are in direct conflict with Eureka County stated plans, goals and policies in our master plan and laws in our county code.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-025-Plan Consistency

Letter 931, Comment 3

The main areas that are still major outstanding issues are related to private property impacts, air quality, water resources, recreation, including fishing and camping on Roberts Creek, and socioeconomic and mitigation of all adverse impacts.

Disposition: Other (SEE RESPONSE)

Response

The BLM has analyzed potential impacts to all the resources list in the comment. Impacts to private property are primarily discussed under Section 3.12, air quality is discussed under Section 3.6, water resources are discussed under Sections 3.2 and 3.3, recreation is discussed under Section 3.15. No changes to the text of the FEIS have been made to address this comment.

Letter 932

Comment 1

I'd like to make comments on both the personal level and company level. Personally, I've been in the mining industry for about 35 years, mostly in construction and engineering, and a little bit in operation. So from a personal standpoint, I'm really excited about this job because mining is certainly a very important basic industry in the United States. And to get this major project going, I think is a huge step to get the strength in mining back.

Then from more of a company standpoint, I work for a company called Ames Construction. We've had an office in Carlin, Nevada doing mining facilities for about the last 24 years. We've worked for about 20 different mining companies in the U.S. So we have a broad range of experience with a broad range of owners. And I tell you that working with the General Moly folks has been a real pleasure. These guys are exactly what I think is needed to move the project forward.

And without embarrassing Bob, I think I want to put in Ames Construction, their priorities, at least as they've expressed them to us. And I think that's environmental stewardship and safety. Those two combined are our number one priority. Next is quality of the project. And finally, safety I'm sorry, finally, cost and schedule. And, again, those kind of go together. But that's the message that we've received from General Moly and in our experience they're a first class team and we're really anxious to participate in the project.

Thank you:

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 933

Comment 1

Well, I'm not involved with Moly mine at all. I am just a citizen of Crescent Valley, have been for 30 years. But you have to stop and think, these people that I have met who are with Moly are all seem to me to be very intelligent people who know the rules, who know what they're doing. And with this environment of 400 employees, plus, hopefully, I can't see anything negative about it.

Nevada is a mining state. Let's face it. It has been. It was nothing until the mining came here. And I feel that they're just carrying on what has always been for this state. It was absolutely nothing but desert until mining came here. And as far as I'm concerned, I feel that they're intelligent enough to know what the rules and regulations are. They seem to be doing everything they can, that I can see. And I for one can only say, I'm for it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 934

Comment 1

I'm Pat Dempsey, a local business man here in Crescent Valley. Been a mason here. My dad was born here. Watched mining since the mining boom started. And the one thing, too, people want to remember about an EIS, this isn't their first day here. These environmental impact studies have been done for years and years and years. BLM does their very best to address every issue. And I really believe that it has been addressed. And the one thing, this is nothing but a positive for Eureka County. We can darn sure use the extra work. And, you know, with the situation that most of the rest of the state is and a lot of U.S., we sure shouldn't hold up any opportunity to create 400 plus jobs. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 935

Comment 1

I'm Gerey Dillinger from from Caterpillar Global Mining. I'm going to stand a little further back here because it was easier. But as a leading supplier to the mining industry, I'd like to express Caterpillar Corporate support for the General Moly Mount Hope mine in Eureka, Nevada. Caterpillar serves a worldwide mining industry through the CAT Global Mining and Association headquartered in Milwaukee, Wisconsin, with regional offices around the world. CAT Global Mining is the single point of contact for global mineral producers and the primary link to Caterpillars extended mining experts.

Caterpillar has a long history of serving the mining industry. As an important commodity, molybdenum plays a key role in the global economy. We hope this new mine will soon receive the necessary federal and state permits needed to commence construction and begin operations. Mount Hope should provide a positive contribution to the state of Nevada, as well as help provide the natural resources we need as a nation. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 936

Comment 1

Hi, I'm Dina Frost. I am new to the area. I am new to mining. If you want to know about amusement parks, I'm your girl. But mining is a whole different thing. But what I've heard from the mining people, the water people, the Caterpillar people, I've heard different sides of the wall. Folks, the wall better come down. Y'all aren't talking to each other. What you're doing is you're playing your own game and your own office.

We've got people out here who are hungry. You've got a community out here, and it sounds like the community is nationwide; people in Milwaukee, people in Reno, people in where was the other place? Mount Hope is bringing mining to Nevada, which already is mining. Do you think that they have not already done how many environmental impact studies in this state already and in this county? Barrick mine out there, do you think that they haven't already done all the environmental studies for it? And you guys are going next door. What's the problem? Our people need to eat. They have families. They have children. We have schools. Get it done. We're tired of waiting. 2006 and it's 12. Hello. Wake up. We're hungry. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 937

Comment 1

My name is John Andress, I'm a resident of Spring Creek, but I guess, more importantly, I consider myself to be a resident of the northern Nevada community. As ya'll know, this is a big community. Agriculture, mining, they've been historical roots, including my own. My heritage began in 1850 in Utah with some of the Mormon pioneer movement. I've had ancestry that rode the Pony Express Trails through eastern Nevada and western Utah.

I'm a supporter of Mount Hope because it continues some of my heritage, my cultural backing where I can raise a family that allows the same environment, the same western heritage to continue on some of the historical traditions that have been there in the past. I've had nothing on my personal side but a wish for this to go through, as well as many other mining projects throughout the intermountain region.

On my business side, I do deal with General Moly, Eureka Moly, and I've had nothing but professional, courteous, respectful conversations with that group where in my own mind I have been convinced thoroughly they have the community's best interest at mind, not just to make money.

Not to be a pep rally here, as it was put eloquently previous to me, but I want to be a supporter. I want to see the heritage continue of mining, the western region of the U.S. to continue in some of the traditions that my parents, grandparents and others have brought down in my roots and my family.

There are other things involved here on the economic impact. In my own opinion, I see moly as being another product to the community to help offset the gold. Having been 30 years in the mining industry I've seen cycles where moly and gold have fluctuated and almost offset each other. So I see that as a stabilizing factor to the Eureka area. It's not a guarantee, but it's a definite possibility that that could exist. I also see the 44 year mine life being a positive. It's not a seven year mine life. It has to have a lot of impact put

into it, study, after study, after study. I am thoroughly convinced as I've studied this project, everything is in place for it to move forward.

Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 938

Comment 1

Okay. Mine is short. I work for a company called Ames Construction and we're we're going to be helping General Moly out as far as the construction part of the work. There's there's a lot of opportunities as far as people that we're going to be needed to be employed. And it's what is it? How many people did they say they needed, 400? Is that right? 400 people, that's quite a bit. You start thinking about that. That's quite an impact for this area, and I think it's a positive one, something that we have to look at. And we're proud to be part of General Moly's group. That's about it.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 939

Comment 1

I'd like to speak from here. I'd like to come out in strong support for Moly. We need it. We need a future. And I'd really like to ask BLM to keep that in perspective in your business. We need a future. We can't just be tied to one thing. And it seems to me Nevada has been awful tied to one thing. So let us get out of that, let us break that, because that future ain't just for my kids, it's going to be for your kids, too. So let's all do what what we can, County included, to help these boys get this going.

I understand there might be some resistance, but sometimes it takes a little honey. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 940

Comment 1

Okay. That's me. I did give a statement earlier but also I'd just like to add, I've been involved in construction and engineering around the world. I've got a bit of an accent, you can probably tell that. But at present I'm with Ames Construction. We've met with and I've met some of the people from Moly on different contracts. You've got an intelligent bunch that they're really good at what they do and they've got a lot of good professionals joining them.

The EIS, if it's allowed to go, develops obviously the economic benefits that we've all just discussed, that's obvious. But part of the reason that I came to the states is it's a really really the best country in the world to be in. And it's founded on traditions, as we've said, of mining within Nevada. There are implications. There are problems. But that's never held America back. Those problems can be identified. They've got a lot of plans. And the EIS gives you the basis.

The mining is going to be there for 44 years. As they find the problems, they will mitigate them. They will develop their plans and it will expand even more. So there are a lot of tags, there are some improvements, but if it can get started, it will be proved and these people have the skills to develop that and improve on what they've got. So this is just a starting point.

So I agree with the lady here, it's been going on for a long time. We need to get it started and it will improve from that. You have a good team, trust them. You've got enough legislation behind that will control them and keep them within the boundary. They're not going to walk out. They're not going to take advantage and they're going to develop a worthwhile resource that will help the county, the state, and this country. Thank you.

Disposition: Comment acknowledged; does not provide new information

Response

CC-001-General Support

Letter 941

Comment 1

The proposed monitoring and mitigation measures do not provide sufficient assurance that the potential impacts can or will be mitigated. For example, the Mitigation Plan requires a cessation in spring and stream flow to occur prior to further environmental analysis and implementation of mitigation. This would result in a substantial and harmful time lag between impact and measures essential to fully protect these resources. Furthermore, it is unclear that the water necessary for the proposed surface water mitigation is available for this purpose. Without this water, the proposed mitigation appears infeasible, ineffective, and not viable over the long term.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 2

The Draft EIS is inadequate because it does not disclose any detail on how BLM will ensure that funds will be available as long as they are needed to implement the closure and post-closure obligations. The availability of adequate resources to ensure effective reclamation, closure, and post-closure management is a critical factor in determining the significance of the project's potential impacts and its environmental acceptability. An adequate reclamation/closure bond and post-closure funding mechanism are needed to ensure that the costs of stabilizing, reclaiming, and managing the site after closure are covered by the mine operator for as long as necessary. If mitigation funds would not be adequate to effectively protect environmental resources from significant and long-term degradation, the project would be environmentally unacceptable.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 3

EPA continues to believe that the adequacy of financial assurance is a critical element to be addressed in the NEPA process and should be disclosed. We believe such disclosure is consistent with CEQ guidance, which states that all relevant, reasonable mitigation measures that could improve the project are to be identified in an EIS and, to ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measures being implemented should also be discussed. We also believe that recent CEQ guidance concerning mitigation may be relevant; this guidance views a discussion of funding for implementation of mitigation commitments as critical to ensuring informed decision making, and suggests that agencies should not commit to mitigation measures if it is not reasonable to foresee the availability of sufficient resources to ensure the performance of the mitigation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 4

EPA is concerned that the discussion of the project's potential impacts to air quality requires revision for a number of reasons, including a lack of consideration of particulate emissions resulting from the loss of phreatophyte vegetation, insufficient information regarding the emission of Hazardous Air Pollutants from the toll roasting process, and a lack of clarity in regards to air modeling protocols employed. The Draft EIS also does not provide sufficient information on the transport and fate of constituents in seepage/draindown solutions from the tailings and waste rock disposal facilities (WRDF).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 941, Comment 5

We recommend that BLM determine the appropriate level of funding for the reclamation/closure bond and the proposed long-term funding mechanism for the proposed Mount Hope Project; analyze the adequacy of the funding amount and mechanism, including associated uncertainties to ensure that sufficient funds would be available as long as they are needed;

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 6

include additional cap and liner controls in the WRDFs to provide more robust source control to protect water quality;
Disposition: Comment acknowledged; does not provide new information

Response

CC-060-PAG WRDF Design

Letter 941, Comment 7

analyze and revise the discussion of potential impacts to and mitigation measures associated with water resources, including their potential risks and anticipated effectiveness;

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 8

prepare more detailed monitoring and mitigation plans with established contingencies in the event that the project proponent is no longer financially capable of implementing essential mitigation measures.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 9

This information should be circulated in a Supplemental Draft EIS for public comment, in accordance with NEPA and CEQ's NEPA Implementation Regulations.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 941, Comment 10

EPA respectfully requests the opportunity to review this information and provide BLM our feedback before you publish the Supplemental Draft EIS.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 941, Comment 11

We recommend that BLM determine the appropriate level of funding for the Mount Hope LTFM and disclose the specific mechanism that will be established for the proposed project; analyze the adequacy of the funding amount and mechanism;

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 12

circulate this information in a Supplemental Draft EIS for public comment.

Disposition: Comment acknowledged; does not provide new information

Response

Comment noted.

Letter 941, Comment 13

We recommend BLM consider the following approaches to help ensure that the Mount Hope LTFM covers the costs of all necessary post-closure monitoring and operation and maintenance (O&M) obligations for as long as they may be needed, which we believe may be at least several hundred years.

Shift to current value trusts or use more realistic discount rates. BLM uses net present value (NPV) trusts (i.e., cost estimates

calculated using a discount rate). EPA allows for current value trusts (i.e., cost estimates calculated in current dollars) in many situations, and under this approach, the trust is fully funded immediately. Where NPV trusts are used, the single most important factor in calculating the beginning amount of the trust corpus (and therefore, the value of the trust in the future) is to use an appropriate discount rate. Overly aggressive discount rates "backload" contributions to the trust over time, and also limit true-up contributions. EPA suggests that BLM consider the use of current value trusts or NPV trusts with a standard benchmark discount rate as opposed to an individually negotiated rate. For example, EPA has authorized the 30-year Treasury Constant Maturity return for some trusts that allow for NPV.

Shift to annual true-up cycle. BLM requires adjustments, or "true-ups", to trust funds every three years if they are not meeting their growth performance goals. EPA strongly supports the idea of a true-up requirement, but recommends that BLM consider using an annual true-up cycle rather than a 3-year cycle, to address both problematic investment performance and the risk of grantor bankruptcy or other corporate failure more often. Catching either of these problems quickly (i.e., with a shorter true-up cycle) would ensure that the trust is better positioned to secure the appropriate funds to make the trust whole.

Consider a more conservative investment portfolio requirement. BLM imposes few limitations on the types of investments allowed for its trust funds. EPA generally imposes significant limitations on potential investments, especially when the trust is an NPV trust. We acknowledge that there is a downside to conservative investment strategies (namely, that the grantor contribution would likely increase), but believe, given the adverse consequences of trust failure for future taxpayers and/or the environment, that a conservative approach may be appropriate in this instance.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 14

It will be important to ensure that the tailings and waste rock disposal facility (WRDF) covers, evaporation ponds, and ET cells are conservatively maintained and rehabilitated/replaced and meet performance standards in perpetuity. We believe that excavation and disposal of ET cell fill and rehabilitation of ET cells will be needed, although the anticipated frequencies of these activities for each ET cell are unknown. Regular inspections and repairs of the tailings and WRDFs will be important, especially after storms and spring snowmelt, as will ongoing O&M and replacement of ponds, liners, draindown collection systems. The Draft EIS does not describe any of these activities nor identify them as post-closure obligations. Additional post-closure obligations will be needed as well, such as road and culvert maintenance; erosion repair and revegetation; maintenance of stormwater channels, retention ponds, and best management practices; water quality monitoring; site security; and associated equipment, materials and labor costs. In light of the monitoring and O&M needs to maintain the assumed performance during the post-closure period, we assume that a crew consisting of two full time employees and equipment and materials, as necessary, may be needed.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 15

The Supplemental Draft EIS should specify all of the post-closure monitoring, O&M, and replacement activities, and describe their performance standards. The Supplemental Draft EIS should also include the cost estimates for these activities, which will be used to estimate the LTFM obligations.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 16

It will, therefore, be important to ensure that funding exists for maintenance of surface water and groundwater monitoring stations and mitigation measures far into the future. While the Draft EIS and the appended Monitoring and Mitigation Plans give cursory mention of the need for long term funding to maintain these activities, development of post-closure funding is delayed for evaluation during the post-Project closure period (p. 3-99).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 17

The Supplemental Draft EIS should provide further detail in regards to the nature and likely expense of long term mitigation measures required for ensuring that surface water resources and senior water rights are maintained after the prescribed 30 year post-closure period.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 18

EPA believes that, particularly in light of the observed volatility of the molybdenum market, it is essential that the Draft EIS consider contingencies in the event that the mine should close prior to the anticipated completion of operations at year 44. EML has indicated that it has contracts for the sale of its product for the first 5 years of mining and milling and is negotiating for an additional 5 years of contracts. However, the proposed project has a 44 year active mining and milling period, only after which will much of the activity take place that is necessary to ensure that the long term impacts of the project are managed.

Disposition: Other (SEE RESPONSE)

Response

43 CFR 3809 requires that the BLM evaluate the project as proposed in the Plan of Operations, which is a project with a 44-year mine life. The Project would be bonded for an amount that would be sufficient to cover the reclamation and closure cost for the operation over the period the bond is designed to cover. No changes to the text of the FEIS have been made to address this comment.

Letter 941, Comment 19

The Supplemental Draft EIS should consider contingencies for purposes of estimating the net present value and/or current value of the LTFM in the event that the mine should close prior to the planned closure period.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 20

Although the Draft EIS considers the extent and propagation of the depression of groundwater levels near the pit and in the project well field area after the cessation of pumping at year 44, it contains no analysis as to the location and extent of drawdown levels should mining cease at some time prior to year 44. The location and extent of groundwater drawdown at various points in time prior to year 44 may affect the significance and timing of the potential impacts the project has on groundwater resources.

Disposition: Comment acknowledged; does not provide new information

Response

Modeling simulation results for years intermediate to the proposed mine life of 44 years are presented in detail in the more detailed hydrogeologic and modeling report, Montgomery et al (2010). As impacts are of a lesser degree for intermediate times, they are not incorporated specifically in the EIS. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 21

The Supplemental Draft EIS should analyze, discuss, and display the location and extent of groundwater drawdown levels at regular intervals during the active mining and milling period. It should also consider the propagation of drawdown levels and flow direction should dewatering and extraction from Kobeh Valley cease during any of the identified intervals.

Disposition: Other (SEE RESPONSE)

Response

The analysis in Section 3.2.3 of the EIS is based on the activities as proposed by EML. This analysis meets the requirements under NEPA and the BLM NEPA Handbook. Monitoring would be used during Project implementation to assess the development of potential water-related impacts and the propagation of the drawdown cone of depression.

Letter 941, Comment 22

We believe the PAG WRDF should be capped with a geomembrane or equivalent (see comments on pages 7 and 8 below),

Disposition: Comment acknowledged; does not provide new information

Response

CC-015-WRDF Cover Design

Letter 941, Comment 23

costs associated with this cover should be accounted for in both the closure/reclamation bond and the LTFM.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 24

We also note that the reclamation/closure cost estimate in the POO does not appear to include the cost for converting ponds into ET cells or netting for ponds during the closure period.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 25

In addition, the closure period is only considered 30 years in the POO. If active evaporation at the WRDF or tailings collection/evaporation ponds takes longer than 30 years, closure-related O&M costs would not be adequately covered.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 26

The Final EIS should include the estimated costs of all closure/reclamation obligations and mitigation measures for the proposed project. Closure/reclamation costs should include contingencies for collection/evaporation pond closure beyond 30 years.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 27

Although EPA appreciates the inclusion of this comprehensive table, the proposed monitoring and mitigation measures identified do not provide sufficient assurance that the potential impacts associated with the proposed groundwater consumption can or will be mitigated.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 28

It is unclear, based upon the Draft EIS and its appendices, what the source and water right for this water would be, given the Project's stated water needs. NEPA requires that an EIS discuss mitigation measures with "sufficient detail to ensure that environmental consequences have been fairly evaluated." An essential component of this discussion is an assessment of whether the proposed mitigation measures can be effective. Furthermore, Council on Environmental Quality (CEQ) guidance states that "to ensure that environmental effects of a proposed action are fairly assessed, the probability of the mitigation measures being implemented must also be discussed." We acknowledge that the Draft EIS attempts to convey the effectiveness of each proposed mitigation measure and the additional impacts that would occur due to mitigation in Table 3.2-9. However, without additional groundwater allocation for which EML does not currently hold the rights, it would seem that most, if not all, of the proposed mitigation for surface water impacts described in Table 3.2-9 would not be possible during the 44 year active mining and milling period. In the absence of these mitigations, the Project is anticipated to result in significant impacts to surface waters (Draft EIS, p. 3-86, Impact 3.2.3.3-2).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-011-Monitoring and Mitigation

Letter 941, Comment 29

In order for the feasibility, effectiveness, and long term viability of the proposed mitigations to be determined, the Supplemental Draft EIS should specify the source for all supplemental water proposed for use as mitigation. It should identify the owner(s) of all water rights to be utilized and the potential environmental consequences of additional groundwater extraction for mitigation purposes. If

EML would be required to divert this water out of its current groundwater allocation, the Supplemental Draft EIS should consider the potential consequences of this on the rate of mining and milling, the socioeconomics of the project, and other affected resource areas.
Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 30

In order to ensure that mitigation essential to the protection of the environment is available as soon as monitoring identifies a need, it is important that environmental impact statements consider in detail the additional impacts that may be associated with mitigation measures. If the EIS does not thoroughly analyze the environmental consequences of proposed mitigation measures, additional environmental review may be necessary before they can be implemented. In many cases, the environmental review process can be lengthy and where mitigation is time-critical, as is the case in regards to surface water resources for the proposed project, significant environmental harm could occur while the environmental review process is taking place.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 31

The Supplemental Draft EIS should analyze the potential environmental impacts associated with the mitigation measures proposed in the Draft EIS and its appendices at a level of detail sufficient to minimize, if not eliminate, the need for additional environmental review prior to implementation of mitigation.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-059-Impacts of Mitigation Implementation

Letter 941, Comment 32

It is unclear why the acreage and function of riparian habitat along these perennial waters have not been assessed. It seems likely that the amount of riparian habitat these waters support is substantial.

Disposition: Comment acknowledged; does not provide new information

Response

The BLM used the best available data for riparian areas located within the area of analysis. No revisions have been made in the EIS in response to this comment.

Letter 941, Comment 33

While this section of the Draft EIS goes on to state that mitigation for the loss of riparian vegetation is anticipated to be "effective to highly effective," it is impossible to determine the true effectiveness of these measures without a proper baseline assessment of the amount of riparian vegetation present in the anticipated impact area.

Disposition: Comment acknowledged; does not provide new information

Response

Based on the impact resulting from reduced flows, the replacement of flows can reasonably be expected to be mitigate impacts to riparian vegetation. No change has been made in the EIS in response to this comment.

Letter 941, Comment 34

As previously discussed, the Draft EIS provides insufficient information regarding the source and amount of supplemental water for use as mitigation. The proposed replacement of dying riparian vegetation at a 3:1 ratio with cuttings, plugs and seeds will not mitigate riparian habitat loss, if hydrology does not exist to support this habitat (p. 3-389).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 35

The Supplemental Draft EIS should include an analysis and discussion of the amount of riparian vegetation along Roberts and Henderson Creeks in order to provide a baseline condition so that potential impacts can be adequately predicted and appropriate mitigation measures can be identified. The potential destruction, reduction or deterioration of any and all riparian/wetland zones should be disclosed. The total acreage of wetland/riparian vegetation associated with potentially impacted surface waters should be

determined and the potential impacts to those communities should be described. Any measures that could mitigate the potential environmental impacts associated with this loss of habitat should be discussed and disclosed as required by 40 CFR 1502.14(f) & 1502.16(h).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 36

According to the Draft EIS, the proposed project would result in the direct loss of ephemeral and intermittent streams; however, the reach and extent of these waters have not been provided in the Draft EIS. Ephemeral stream channel flows contribute significantly to groundwater recharge in arid regions. Stormwater flows also provide seasonally significant surface water contributions to downstream waters. Collectively, in unaltered watersheds, storm flows are a significant source of water contributing to the base flow of downstream receiving waters. In addition, ephemeral and intermittent streams provide resting and forage for wildlife, and serve as important corridors for wildlife movement.

Recommendation: In order to fully assess the environmental impacts of the proposed project, the direct and indirect impacts associated with the loss of ephemeral and intermittent streams should be analyzed in the Supplemental Draft EIS.

Disposition: Comment acknowledged; does not provide new information

Response

The Proposed Action would result in effects to ephemeral streams due to land surface alteration at the TSF and at the WRDFs immediately surrounding the open pit. Stormwater and resultant flows in streams would not otherwise be affected by the project. The ephemeral drainages may contribute a small amount to ground water recharge, and provide a sporadic source of water to wildlife. Effects to ground water recharge are incorporated within the reporting of Project impacts, and result in an estimated recharge reduction of 38 acre-feet per year. Water supply to wildlife is not reliable from these sources. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 37

BLM should consider the appropriateness of the ten-foot groundwater table drawdown contour as the threshold for significance. If it is reasonable to anticipate that adverse environmental impacts could be associated with a drawdown of a lesser extent, the Supplemental Draft EIS should analyze that threshold. The Supplemental Draft EIS should disclose all resources likely to be affected by the proposed groundwater pumping under the revised significance threshold.

Disposition: Comment acknowledged; does not provide new information

Response

CC-096-Ten-Foot Isopleth

Letter 941, Comment 38

A new JD should be conducted for the Project and sent to the USACE and EPA for review consistent with current Rapanos guidance.

Disposition: Comment acknowledged; does not provide new information

Response

EML has requested that the USACE extend the verification of the jurisdictional determination (JD). The USACE has requested additional information prior to completing this verification. A new JD would be conducted if necessary as directed by the USACE.

Letter 941, Comment 39

The Supplemental Draft EIS should discuss the status of the JD and any ongoing dialog with the USACE in regards to this matter.

Disposition: Other (SEE RESPONSE)

Response

The following text has been added to the end of the first paragraph under Section 3.2.2.5: "EML has requested that the USACE extend their verification of the jurisdictional determination. The USACE has requested additional information prior to completing this verification."

Letter 941, Comment 40

modeled WRDF seepage estimates are not provided in the Draft EIS to support any conclusions for average to dry conditions or for wetter conditions during the periods either before or after closure of these facilities. Waste rock facilities that have very low average seepage one year may have orders of magnitude greater seepage the following year (for several weeks to several months) in response to wet conditions. It is unclear from the Draft EIS, therefore, that the proposed soil cover will provide source control essential to proper functioning of the seepage collection system and ET cell, which will be needed to protect water resources from PAG seepage.

Disposition: Comment acknowledged; does not provide new information

Response

The source control provided by the proposed soil cover is not essential to proper functioning of the seepage collection system as stated by the commenter. The proposed soil cover will store and release precipitation received during dry and normal years, and the modeling conducted by MWH Americas indicates that a greater thickness would not appreciably reduce infiltration. Thus, the proposed soil cover would effectively minimize potential infiltration. The proposed seepage collection and management system would not depend on the effectiveness of the soil cover but would be in addition to the soil cover. The lined collection system and ET cell would preclude release of any solution that did penetrate the soil cover, thus providing necessary and appropriate water resource protection. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 41

In light of the anticipated contaminant concentrations in the PAG seepage, EPA recommends the PAG WRDF be capped with a geomembrane or equivalent to provide more robust source control needed to protect water quality.

Disposition: Comment acknowledged; does not provide new information

Response

CC-015-WRDF Cover Design

Letter 941, Comment 42

The Supplemental Draft EIS should describe the modeling conducted to determine the full range of seepage volumes over time (i.e., throughout operations, closure/reclamation, and post-closure) from the PAG WRDF and LGO stockpile, and describe the modeling results. The discussion should also include:

- The fate and transport of constituents in the PAG WRDF and LGO stockpile seepage over the course of operations, closure, and post-closure; and
- How unintended and/or unmitigated releases of seepage from these facilities could affect surface water or groundwater quality.

Disposition: Comment acknowledged; does not provide new information

Response

Modeling of TSF draindown rates during operations and closure was used in development of the reclamation schedule and cost estimate, and is provided in Appendix 14 -3B of the Plan of Operations. PAG waste rock and low grade ore would be placed as dry material and significant draindown is not anticipated from either facility. All three of these facilities would be constructed with liners and solution collection systems to prevent seepage releases; analysis of a worst case scenario is not required. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 43

Modeled WRDF seepage estimates are not provided in the Draft EIS to support any conclusions regarding the seepage movement through the non-PAG WRDF during the periods either before or after closure of this facility. It is unclear, therefore, why the non-PAG WRDF would not also be lined.

Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 44

In light of the anticipated elevated concentrations of seepage from the non-PAG WRDF under non-acidic conditions, we believe the non-PAG WRDF should include a lined foundation, drainage network, and collection system similar to the system planned for the PAG WRDF.

Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 45

We also believe that a reliable method is needed to identify non-PAG waste rock with high potential to leach lead, zinc, and cadmium so that this material can be assigned to the PAG WRDF.

Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 46

A contingency measure should be included to convert the non-PAG sedimentation ponds into ET cells after closure should monitoring of seepage from the non-PAG WRDF during operations indicate the need to preclude it from being discharged to surface waters.

Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 47

The Supplemental Draft EIS should address these issues.

The Supplemental Draft EIS should describe the modeling conducted to determine the full range of seepage volumes over time from the non-PAG WRDF, and describe the modeling results. The discussion should also include:

- The fate and transport of constituents in the non-PAG WRDF seepage over the course of operations, closure, and post-closure; and
- How unintended and/or unmitigated releases of seepage from this facility could affect surface water or groundwater quality.

Disposition: Comment acknowledged; does not provide new information

Response

CC-100-Waste Rock Seepage

Letter 941, Comment 48

The Draft EIS does not describe in detail the potential fate or impacts of underdrain and draindown solutions from the North and South Tailings Storage Facilities.

Disposition: Comment acknowledged; does not provide new information

Response

The predicted geochemical behavior of the tailings material is described in the 2008 Mount Hope Project Tailings Geochemical Characterization Report. This report concludes that the tailings material would contain a high amount of neutralization from the process solutions which would limit the acid generation and metal release from the tailings material. Another limiting factor is the encapsulation of a significant proportion of the sulfides inside non-reactive silicate minerals. A prediction of the constituent concentration of the tailings draindown solution was completed using USGS-developed software PHREEQC and predicts tailings draindown solutions with neutral pH (around 7 s.u.) and constituent concentrations below NDEP reference values for all constituents with the exception of aluminum, antimony, fluoride, iron and manganese throughout the life of operations, and elevated sulfate in the final years of operations.

The tailings facilities would be constructed with a geosynthetic liner such that no seepage from this facility would be released to the environment (i.e., a zero discharge facility). During closure and reclamation, the tailings would be covered to minimize long term infiltration into the tailings impoundments, which would reduce the quantity of pore water generated and potential environmental risk. An ET cell would be constructed to manage long-term draindown solution and prevent discharge to the environment. A fate-transport model that describes the potential for draindown solution from the tailings impoundment to impact groundwater is not necessary, and the EIS is not required to evaluate worst-case scenarios.

No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 49

because the draindown solutions in the ET cells are anticipated to be of "relatively good quality," the constituents that could potentially be taken up by vegetation are not likely to provide a risk to wildlife receptors; however, at the time of final permanent closure, a Screening Level Ecological Risk Assessment (SLERA) would be completed to determine the detailed risks based on the fluids present in the tailings storage facilities, and the design would be modified accordingly. None of the documents we have reviewed appear to support the statement that solutions in any of the ET cells will be of relatively good quality. For example, over time, the tailings will become acidic with elevated aluminum, antimony, arsenic, cadmium, fluoride, manganese, molybdenum and sulfate concentrations (Draft EIS, p. 2-53). Seepage from the PAG WRDF is expected to contain elevated concentrations of aluminum, arsenic, cadmium, fluoride, manganese, nickel, zinc, copper, iron, lead, beryllium, thallium, selenium, sulfate, and total dissolved solids; and seepage from the non-PAG WRDF may have high levels of iron, manganese, aluminum, arsenic, fluoride, nickel, zinc, and cadmium (Draft EIS, section 3.3.2.2.3). EPA believes an ecological risk assessment should be conducted as part of the NEPA process.

Disposition: Not within agency's jurisdiction (SEE RESPONSE)

Response

CC-013-Wildlife

Letter 941, Comment 50

The potential risks associated with the ET cells should be determined and disclosed in the Supplemental EIS so that appropriate mitigation measures can be developed and disclosed, and the reclamation/closure and post-closure costs can be estimated for inclusion in the financial assurance for the project.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 51

Appropriate modeling and analysis should be conducted to determine the potential fate and impacts of constituents in the seepage and draindown solutions from the WRDFs (including the non-PAG WRDF), LGO stockpile, and tailings over the course of closure and post-closure, as well as the ecological risks posed by their ET cells.

Disposition: Not within agency's jurisdiction (SEE RESPONSE)

Response

CC-013-Wildlife

Letter 941, Comment 52

The Supplemental Draft EIS should provide the following information:

- Identify the constituents and their potential concentration ranges anticipated in the seepage and draindown solutions over the course of operations, reclamation/closure, and post-closure.
- Describe and discuss the potential problems that could result from contaminants concentrated in the ET cells after closure.
- Describe plans for vegetating the ET cells, and discuss whether changing draindown rates over time would be expected to result in changes in species types and densities for each ET cell.
- For each ET cell, describe the initial and total anticipated loading of metals and other contaminants, whether they are expected to plug up over the long term, whether they will need to be occasionally excavated, and if so, how frequently. This discussion should be supported with the results of modeling conducted to address these issues.
- For each ET cell that may need to be excavated, describe how excavated ET fill would be disposed and ET cells reconstructed and maintained.
- Describe the plant and animal exposure pathways for constituents from draindown solution in each of the ET cells, and any unintended ponding that may occur.
- Discuss whether anticipated concentrations of contaminants from any of the pathways would be harmful to plants or wildlife.
- Describe the potential contaminant uptake and bioaccumulation predicted for plants, invertebrates, and other wildlife in the ET cells. The discussion should address all potential pathways, including the ET cell fill (tailings) and growth medium as precipitates, metals, and salts accumulate, as well as any ponding that may occur.
- Discuss whether vegetation would need to be occasionally harvested in order to reduce bioaccumulation of metals in the food web, and at what frequency, based on modeling conducted to address these issues. Address whether and how the timing of ET cell excavations could affect the timing and need for vegetation harvests.
- Describe methods that would be used to exclude wildlife (e.g., netting and fencing) from the ET cells or any ponded water to minimize risks to wildlife during operations, closure, and/or post-closure.

Disposition: Comment acknowledged; does not provide new information

Response

ET cells are conservatively designed so that solution can be evaporated within the surface area provided. Thus, solution evaporation is not dependent on vegetation densities or vigor. The ET cells would be lined so that determination of precise influent chemistry is not necessary. As stated in the Plan of Operations (Section 4.P) costs to replace ET cell backfill would be included in a long-term funding mechanism. The timing for rehabilitation of the ET cells would be based on the modeled draindown rates that were used to develop the reclamation schedules and closure plans. No changes to the text of the EIS have been made to address this comment.

Letter 941, Comment 53

The Draft EIS contains several inconsistencies and/or items that need clarification regarding the PAG and non-PAG collection channels and ponds. For example, page 2-58 describes the PAG and non-PAG WRDF diversion and collection channels as being lined with 60-mil HDPE. The Mount Hope Project Stormwater Management Plan (SRK, July 2011) indicates, however, that the non-PAG WRDF collection channels will be lined with geomembrane in steeper areas and rip-rap in less steep areas where the channels flow into sediment retention basins. Figures 2.1.10 and 2.1.19 in the Draft EIS depict the collection channel at the toe of the non-PAG WRDF as an unlined diversion channel with rip-rap and the PAG WRDF collection/diversion channel with compacted low permeability base and rip-rap. These figures do not indicate use of geomembranes. Page 2-84 of the Draft EIS indicates that the collection pond for the PAG WRDF will be lined with a geomembrane but does not indicate whether the non-PAG collection pond would be lined with a geomembrane.

Disposition: Comment acknowledged; does not provide new information

Response

The collection ditches and ponds for the PAG WRDF and LGO Stockpile would be geomembrane lined. The collection ditches for the non-PAG would be lined in steep areas as needed to provide erosion protection. The sedimentation ponds for the non-PAG would not be lined with geomembrane. The EIS and Stormwater Management Plan accurately describe these proposed design features. No change has been made in the EIS in response to this comment.

Letter 941, Comment 54

EPA recommends that the PAG and non-PAG WRDF collection channels and ponds be lined with a geomembrane.

Disposition: Comment acknowledged; does not provide new information

Response

Collection channels and ponds associated with the PAG WRDF would be lined with geomembrane as described in the Plan of Operations and EIS. The proposed design of the non-PAG collection channels includes geomembrane liner for steeper portions to provide erosion protection for the integrity of the channels. The modeled solution quality that would result from drainage through the non-PAG waste rock does not otherwise warrant lining of the channels and ponds for this facility. No change has been made in the EIS in response to this comment.

Letter 941, Comment 55

The Supplemental Draft EIS should rectify the discrepancies identified above.

Disposition: Other (SEE RESPONSE)

Response

Comment noted.

Letter 941, Comment 56

For purposes of planning post-closure obligations (e.g., ET cell O&M and excavations) and estimating post-closure costs, EPA recommends the more conservative draindown response curves be used. In addition, contingencies should be applied for greater than anticipated draindown during wet periods (500-yr event, rain-on-snow storm event, or a wet period preceding a large storm), which could lead to increased draindown reporting to the ponds and ET cells.

Disposition: Comment acknowledged; does not provide new information

Response

CC-060-PAG WRDF Design

Letter 941, Comment 57

The Draft EIS states that the run-on diversion channel for the North Tailings Facility will not be designed until two years before closure.

Disposition: Comment acknowledged; does not provide new information

Response

CC-106-Run-on Channel Design

Letter 941, Comment 58

The Supplemental Draft EIS should provide a general description of the proposed run-on channel and depict it in maps of the proposed mine facilities.

Disposition: Comment acknowledged; does not provide new information

Response

CC-106-Run-on Channel Design

Letter 941, Comment 59

Although EPA agrees that an adaptive management approach is appropriate in cases where significant uncertainty remains despite a good faith effort to perform thorough upfront environmental analysis, as in this case, we have serious concerns that these monitoring and mitigation plans are insufficient to ensure that water resources would be adequately protected in the long term.

In regards to surface water resources, the text of Section 3.2.3.3 states that "if monitoring indicated that flow reduction of perennial surface waters are occurring... the following measures would be implemented..." (p. 3-86). In contrast, the Mitigation Plan relies upon Table 3.2-9 of the Draft EIS for identification of site specific measures. This table states that mitigation would be triggered by a "cessation in flow coincident with a reduction in ground water levels in this area". This mitigation trigger is applied for nearly all

surface water resources, including Roberts Creek, which experiences flow rates in excess of 6,500 gallons per minute (p. 3-96). EPA objects to the use of cessation of flow as the trigger for implementation of measures essential to ensuring the continued flow of surface waters. Should surface water resources be allowed to run completely dry before BLM or EML even begins the process of further analyzing site specific mitigation (Appendix C, page C-4), it seems unavoidable that the riparian habitat and beneficial wildlife, livestock, and human uses associated with these surface waters would be severely and adversely impacted. In addition, this mitigation trigger directly contradicts the stated goal of the monitoring program at Item 10, which states that this Plan would "provide an early warning before project impacts become unmanageable" (Appendix B, page 2).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 60

According to the Draft EIS, impacts resulting from the pumping of groundwater in Kobeh Valley under the proposed project would persist for over 100 years, while those associated with the pit dewatering operations would remain for a period greater than 400 years. In fact, even after the 400 year period modeled, the groundwater table drawdown associated with pit dewatering displays only a mild contraction in total area. Despite this, Mitigation Measures 1 and 3 for Surface Water Resources in Appendix C discuss long term impacts associated with the project as uncertainties that would need further analysis to assess. Responsibility for monitoring and mitigation is required of EML for only a 30 year period after the cessation of mining and milling operations, and additional analysis of the nature of longer term measures to ensure maintenance of surface water resources is delayed until the mine closure period. Considering the scale and duration of potential impacts associated with this project, it seems unavoidable that much longer term mitigation measures will be necessary if surface water resources are to be maintained. As such, the current discussion regarding long term surface water maintenance activities is insufficiently vague and does not provide firm enough commitments to guarantee long term protections.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 61

BLM should require mitigation to be triggered by any reduction in flow attributable to mine-induced drawdown of groundwater levels. Table 3.2.9 should be revised to reflect this requirement. The Supplemental Draft EIS should require that trend analysis be an ongoing element of the water quantity monitoring plan so that, as reductions in water quantity are detected, they can be investigated and mitigation measures can be implemented in an expedited fashion.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 62

The Supplemental Draft EIS should also provide firmer commitment to long term surface water mitigation measures.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-062-Mitigation of Diminished Water Flows

Letter 941, Comment 63

We were unable to find any additional discussion of water quality monitoring or identification of water quality monitoring sites in the Draft EIS. Tables 6-12 and 6-13 in the POO identify several wells and facility fluid collection areas that would be monitored, but for only the mine closure period, and for only up to 30 years. These tables do not include monitoring of the pit lake or WRDF seepage and drawdown solutions.

Recommendations: BLM should require water quality monitoring of groundwater, springs (including the spring drainage from under the non-PAG WRDF and adjacent to the PAG WRDF), stormwater, seepage collection ponds, other surface expressions of water, and ET cells. Such monitoring will be critical to ensuring that the mine facilities are working properly and that measures can be taken quickly to rectify problems if adverse water quality trends are detected. EPA believes that all of this monitoring, as well as pit lake monitoring, will likely be needed for hundreds of years after closure. For planning and cost estimation purposes, water quality and flow monitoring at the mine should be required in perpetuity.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-057-Funding for Reclamation/Closure Bond

Letter 941, Comment 64

The Supplemental Draft EIS should include a detailed table identifying all groundwater, surface water, and mine facility locations that will be monitored throughout mine operations, closure/reclamation, and post-closure. The table should identify the parameters to be monitored, frequency of monitoring and reporting, and the standards that will need to be met for each parameter in each setting. Trend analysis should be an ongoing element of the water quality monitoring plan so that, as water quality trends are detected, they can be investigated and appropriate mitigation measures can be implemented promptly.

Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 941, Comment 65

We were unable to find a map anywhere in the Draft EIS or POO depicting the mine facilities with an overlay of the proposed water quality and water quantity monitoring locations. This compounds the lack of clarity regarding which sites and facilities will be monitored, whether the proposed monitoring sites are the most appropriate, and whether additional or alternate monitoring locations may be needed.

Disposition: Other (SEE RESPONSE)

Response

The BMRR has responsibility for ground water protection in the State of Nevada and would require appropriate monitoring pursuant to the Water Pollution Control Permit. The monitoring locations can be requested from the Battle Mountain BLM Office. No change to the text of the FEIS has been made to address this comment.

Letter 941, Comment 66

The Supplemental Draft EIS and Monitoring Plan should provide one or more maps depicting the locations of all monitoring sites for both water quality and water quantity overlaid on the mine facilities and appurtenances. The identifying labels for each monitoring location on the maps should be consistent with the identifying labels for each monitoring location in the Monitoring Plan.

Disposition: Already addressed in planning documents

Response

CC-125- Mitigation/Monitoring Plan

Letter 941, Comment 67

Monitoring should address the integrity of the WRDF cap/covers, solution collection systems, evaporation ponds, and ET cells; the water quality of the collected solutions, groundwater, stormwater, and any other surface water expressions in the vicinity of, or potentially associated with, the WRDFs; and the composition of the ET cell growth medium, pore water, and vegetation from the standpoint of bioaccumulation and ecological risk. Such monitoring should continue in perpetuity.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 68

The Mitigation Summary Plan provides neither the action levels that would trigger measures to rectify water quality deterioration problems, nor the mitigation measures that would be implemented in each case.

Recommendation: The detailed monitoring table recommended above should also specify the Action Levels for each water quality parameter in each setting. Action Levels should be established to trigger investigation and mitigation measures before standards are exceeded to ensure continued protection of water quality. The Mitigation Summary Plan should provide specific mitigating actions to be implemented in the event that monitoring identifies mine-related degradation of surface water or ground water quality.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-082-Mitigation to Water Resource Impacts

Letter 941, Comment 69

EPA is not clear why the Mount Hope Monitoring Plan and Mitigation Plan have been separated rather than being presented as a single Monitoring and Mitigation Plan. Monitoring and mitigation should work seamlessly together to identify and rectify environmental impacts before problems become unmanageable. Organizing these plans individually reduces clarity and introduces the possibility for inconsistency.

Recommendation: The Monitoring Plan and Mitigation Plan should be joined into a Monitoring and Mitigation Plan that provides a more comprehensive approach to controlling and preventing environmental contamination.

Disposition: Other (SEE RESPONSE)

Response

The Water Resources Monitoring Plan, developed with input from agencies and stakeholders, is part of the Plan of Operations and thus is part of the Proposed Action. In the case of impacts to water resources, mitigation has been developed by BLM resource specialists in response to the Proposed Action and becomes part of the EIS. The necessary result is two separate documents, however, the separation of these two components does not prevent them from working "...seamlessly together to identify and rectify environmental impacts before problems become unmanageable." No change to the text of the FEIS has been made to address this comment.

Letter 941, Comment 70

The Draft EIS estimates substantial loss of phreatophytic vegetation as a consequence of drawdown of groundwater table levels. This change in vegetative coverage may increase the amount of windblown dust particulate emissions in the region. While the Draft EIS makes no statement as to the significance of these emissions, it is possible that they could have significant adverse impacts on local and regional air quality. However, because no evaluation of this impact has been provided, no conclusions can be made regarding the severity of these emissions in relation to the National Ambient Air Quality Standards (NAAQS) for particulate matter 10 microns or less (PM10), or for particulate matter 2.5 microns or less (PM2.5).

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 941, Comment 71

The Supplemental Draft EIS should discuss the anticipated particulate emissions associated with the loss of vegetative communities due to groundwater drawdown. While there may not be an emissions factor for estimating emissions from this source, it is often possible to develop an emission factor based on site-specific geologic conditions that would generate a more accurate emissions estimate. We recommend BLM's air quality analysts consult with windblown dust experts from the Nevada research community, whom we are aware have done extensive wind-blown dust studies, to develop site-specific emissions factors.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-020-Impacts to Phreatophytes

Letter 941, Comment 72

The proposed Mount Hope Mine would toll roast molybdenum ore from other mines, involving delivery of up to seven 22-ton capacity highway trucks per day, and off-site transport of up to nine 22-ton capacity highway trucks every two days. The Draft EIS does not include additional information regarding the potential sources of this off-site ore or the estimated vehicle miles traveled associated with it. It is also unclear whether the emissions associated with on-site and off-site delivery of toll roast ore, process chemicals, fuels, etc., have been accounted for in the criteria pollutant emissions estimates for the proposed project and alternatives.

Disposition: Other (SEE RESPONSE)

Response

The identification of the potential sources of these off-site (toll) ores is not possible and cannot be quantified. NEPA does not require the EIS to speculate on potential sources of ore concentrate. Any processing of these ores through the roaster would have to be done based on the current permit limits in the Project Air Quality Operating Permit which has been issued by the NDEP. Section 3.6 of the EIS discloses the potential air quality impacts associated with the current Project design and Air Quality Operating Permit.

Letter 941, Comment 73

The Supplemental Draft EIS should describe the direct, indirect, and cumulative air impacts associated with the project. The discussion should include the potential toll roast ore sources, and estimates of the vehicle miles traveled and criteria pollutant emissions associated with all aspects of the project including: toll roast ore, process chemicals, fuels, and other materials.

Disposition: Other (SEE RESPONSE)

Response

The potential direct and indirect effects from the Proposed Action are disclosed under Section 3.6.3. The potential cumulative effects are disclosed under Section 4.5.6. Nevada has authority to regulate air quality and the Project would be subject to the conditions of an NDEP-issued air quality permit to ensure adherence to all applicable limits and pollution controls. No changes to the text of the FEIS have been made to address this comment.

Letter 941, Comment 74

In a discussion of roaster off gas emissions, the Draft EIS (p. 2-42) does not identify any hazardous air pollutants (HAP) associated with the proposed Mount Hope roasters. Lead, mercury, arsenic, antimony, cadmium, selenium, nickel and manganese may be associated with molybdenum roaster emissions. HAPs concentrations in molybdenum concentrate vary from mine to mine, and it is unclear from Section 3.6, Air and Atmospheric Values, whether HAPs from toll roasting of ore from other mines were accounted for in the HAPs emissions estimates in Table 3.6-10.

Disposition: Analysis modified (SEE RESPONSE)

Response

CC-105-Modeled Air Quality Impacts

Letter 941, Comment 75

Table 3.6-10 in the Supplemental Draft EIS should include estimated HAPs emissions from the Mount Hope roasters for all sources of concentrate, i.e., from the Mount Hope mill and from offsite mines.

Disposition: Other (SEE RESPONSE)

Response

The best available information was used in the DEIS to develop the information presented in Table 3.6-10. No change to the text of the FEIS has been made to address this comment.

Letter 941, Comment 76

Even when projects are expected to meet all NAAQS, we encourage agencies to explore mitigation measures that can further reduce emissions of criteria pollutants. Several mitigation measures exist to reduce particulate matter, nitrogen dioxide (NO₂), ozone precursors, and other HAPs.

Recommendations: In addition to the dust control measures mentioned in the Draft EIS (p. 2-65), EPA recommends the following mitigation measures be included in the Supplemental Draft EIS in order to reduce impacts associated with emissions of particulate matter, NO_x, ozone, and other toxics from mining activities:

- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible;
- Lacking availability of non-road construction equipment that meets Tier 4 engine standards, EML should commit to using best available control technology to reduce emissions of diesel particulate matter and other pollutants at the mine site; and
- Consider alternative fuels such as natural gas and electricity (plug-in or battery).

Disposition: Other (SEE RESPONSE)

Response

Comment noted.

Letter 941, Comment 77

It is unclear based upon the information presented in the Draft EIS whether all potential sources of NO₂ have been accounted for in the model. Section 3.6.3.2, which summarizes the modeling protocols employed for the project, only discusses particulate emissions rather than all Clean Air Act criteria pollutants associated with the project.

Recommendation: Ensure that all sources of NO₂ have been accounted for in the model. Provide additional information in Section 3.6.3.2.1 summarizing the modeling protocols employed for all criteria pollutants associated with the project, not just particulate emissions.

Disposition: Other (SEE RESPONSE)

Response

All Project sources of NO₂ have been included in the air quality impact analysis.

Letter 941, Comment 78

The Draft EIS (p. 3-254) indicates that EPA would update the 8-hour ozone standard in late 2011. The standard was revised on March 12, 2008 to 0.075 parts per million, which is the current standard. EPA is proceeding with designating new nonattainment areas for the 2008 8-hour ozone standard. There are no new nonattainment areas in Nevada for the 2008 8-hour ozone standard.

Recommendation: The FEIS should update this language.

Disposition: Factual correction made (SEE RESPONSE)

Response

The text in Section 3.6.1.1 has been revised to read "...a proposed standard is expected in 2013 or later." In addition, the value in Table 3.6-1 has been revised to read "0.075".

Letter 327 Comment 1, Letter 328 Comment 1, Letter 329 Comment 1, Letter 330 Comment 1, Letter 331 Comment 1, Letter 336 Comment 1, Letter 337 Comment 1, Letter 338 Comment 1, Letter 339 Comment 1, Letter 340 Comment 1, Letter 341 Comment 1, Letter 342 Comment 1, Letter 343 Comment 1, Letter 344 Comment 1, Letter 345 Comment 1, Letter 346 Comment 1, Letter 347 Comment 1, Letter 348 Comment 1, Letter 349 Comment 1, Letter 350 Comment 1, Letter 351 Comment 1, Letter 352 Comment 1, Letter 353 Comment 1, Letter 354 Comment 1, Letter 355 Comment 1, Letter 356 Comment 1, Letter 357 Comment 1, Letter 358 Comment 1, Letter 364 Comment 1, Letter 365 Comment 1, Letter 366 Comment 1, Letter 367 Comment 1, Letter 387 Comment 1, Letter 388 Comment 1, Letter 389 Comment 1, Letter 389 Comment 2, Letter 389 Comment 3, Letter 389 Comment 4, Letter 399 Comment 1, Letter 400 Comment 1, Letter 408 Comment 1, Letter 795 Comment 1, Letter 800 Comment 1, Letter 810 Comment 1, Letter 811 Comment 1, Letter 812 Comment 1, Letter 814 Comment 1, Letter 815 Comment 1, Letter 817 Comment 1, Letter 818 Comment 1, Letter 821 Comment 1, Letter 822 Comment 1, Letter 835 Comment 7, Letter 837 Comment 1, Letter 842 Comment 1, Letter 843 Comment 1, Letter 846 Comment 1, Letter 856 Comment 1, Letter 866 Comment 1, Letter 867 Comment 1, Letter 869 Comment 1, Letter 870 Comment 1, Letter 871 Comment 1, Letter 872 Comment 1, Letter 873 Comment 1, Letter 875 Comment 1, Letter 876 Comment 1, Letter 877 Comment 1, Letter 878 Comment 1, Letter 879 Comment 1, Letter 880 Comment 1, Letter 881 Comment 1, Letter 882 Comment 1, Letter 883 Comment 1, Letter 884 Comment 1, Letter 886 Comment 1, Letter 887 Comment 1, Letter 888 Comment 1, Letter 889 Comment 1, Letter 890 Comment 1, Letter 891 Comment 1, Letter 892 Comment 1, Letter 893 Comment 1, Letter 894 Comment 1, Letter 895 Comment 1, Letter 896 Comment 1, Letter 897 Comment 1, Letter 898 Comment 1, Letter 900 Comment 1, Letter 901 Comment 1, Letter 902 Comment 1, Letter 904 Comment 1, Letter 905 Comment 1, Letter 909 Comment 1, Letter 910 Comment 1, Letter 911 Comment 1, Letter 912 Comment 1, Letter 914 Comment 1, Letter 915 Comment 1, Letter 916 Comment 1, Letter 917 Comment 1, Letter 918 Comment 1, Letter 919 Comment 1, Letter 920 Comment 1, Letter 921 Comment 1, Letter 922 Comment 1, Letter 923 Comment 1, Letter 924 Comment 1, Letter 925 Comment 1, Letter 925 Comment 3, Letter 926 Comment 1, Letter 927 Comment 1, Letter 929 Comment 1, Letter 930 Comment 1, Letter 932 Comment 1, Letter 933 Comment 1, Letter 934 Comment 1, Letter 935 Comment 1, Letter 936 Comment 1, Letter 937 Comment 1, Letter 938 Comment 1, Letter 939 Comment 1, Letter 940 Comment 1

CC-002-Socioeconomics General Disruption

Commenter expressed concern that the socioeconomic analysis favors the generation of tax revenue that does not recognize the social aspects of socioeconomics. The EIS fails to acknowledge that tax revenue is not Eureka County's primary concern.

Response

Effects on Social Conditions and Affected Publics are discussed in Section 3.17.3.3.6. As stated in that section, there are no significance criteria for determining impacts on social conditions and affected publics. The EIS analyzes impacts on social conditions and affected publics throughout the document.

In addition, a community opinion survey was conducted in April 2010 for the Mount Hope Project. The survey showed that approximately 89 percent of respondents were supportive or very supportive of mining in Eureka County, and the reasons for support included increased job opportunities, economic development, and increased tax revenue. In addition, approximately 74 percent of respondents were supportive or very supportive of the Mount Hope Project.

The text at the end of Section 3.17.2.2.6 has been modified to incorporate this public opinion survey of the residents of Eureka County (McDowell Group 2010) as follows, "A telephone survey of Eureka County residents was conducted in April 2010 to gauge residents opinion on the Project. A total of 680 telephone numbers were called, which represents nearly all households in the greater Eureka, Crescent Valley, and Diamond Valley areas, and 219 responses to the survey were received. Of the 219 responses, 51 percent lived in Eureka, 24 percent lived in Crescent Valley, 20 percent lived in Diamond Valley, three percent lived in Beowawe, and two percent lived in Pine Valley. Nearly three-quarters of the area residents (74 percent) were supportive of the Project development, including 33 percent who were "very" supportive. Fifteen percent of the residents were opposed and 11 percent did not know or declined to respond. Of the 15 percent who opposed to Project, approximately half cited competition for water/bad for farms as their reason, while 21 percent mentioned population growth and 18 percent mentioned water pollution. Among the 74 percent who support the Project, the most important factor (42 percent) was the addition of new, high-paying jobs to the area, followed by increased revenues for local businesses (27 percent), providing minerals and metals our country needs (12 percent), and more tax revenues for local government (11 percent) (McDowell 2010)."

The analysis in Section 3.17.3.3.6 discloses the type and magnitude of anticipated impacts and is not intended to draw conclusions about residents preferences. Overall socioeconomic stability of the entire region is outside the scope of this analysis. Also, the decrease in operational employment would be approximately 30 percent, which is not substantially different from the Proposed Action. The EIS states that generally the same number of employees are needed to operate and maintain the mill, leading to no appreciable decrease in employee numbers. Additionally, the Proposed Action mine life is already 44 years, which is almost four times (assuming average mine life is 12 years) as long as most open pit mine operations in Nevada.

Comments

Letter 803 Comment 15, Letter 803 Comment 76, Letter 803 Comment 294

CC-003-Socioeconomics School Enrollment

Commenter expressed concern about the values used for school enrollment in the analysis. The values used are too low. The timeframes used for the collected data are not representative of the school enrollment.

Response

Section 3.17.3.3.4 includes a subsection specifically describing the school enrollment sensitivity analysis. Scenario 3 of the sensitivity analysis provides for the upper bound of potential population effects from the Project, and accounts for an increased total enrollment at the elementary school of 233 students, and an increased total enrollment at the middle/senior high school of 80 students. When added to the Fall 2009-2010 total enrollment numbers, the increases anticipated under Scenario 3 would be below the schools' maximum capacities. The EIS discloses that if increases occurred as described under Scenario 3, the Eureka County School District would most likely be required to hire additional instructional staff and may also see higher levels of other instructional costs, administrative costs, and transportation costs, when compared to the Base Case scenario.

The ratio of 16 percent of incremental school enrollment to relocating population derived by the commenter from Table 3.17-23 is based on the total population associated with the Mount Hope project. Total population includes weekly commuters who are assumed to travel to the Eureka area each week in single status and return to their homes outside of the Eureka area during their days off. These workers are assumed to be in the area without households or school age children. For the period covered in the table, weekly commuters are assumed to be 40 percent of the workforce. When considering only resident population (i.e., total population less weekly commuters), the analysis assumed the proportion of school age children to be 21 percent. This distinction has been clarified in the document (Appendix E). It should be noted that the current (2010) ratio of public school enrollments to resident population for Nevada counties ranges from 8.4 percent to 20.4 percent, while the state-wide ratio is 16.2 percent (Nevada Department of Education [2010]). Based on these state-wide county-level figures, the BLM's assumption of 21 percent is actually quite conservative with respect to typical ratios. Review of historical population and Eureka County enrollment data shows that this ratio has not exceeded 21 percent in the last 11 years. The BLM believes the analysis is based on the best available information. Enrollment trends in comparison to population during the full period of time the Ruby Hill Mine suspended operations and after operations resumed are also illustrative of this point. The year to year trends vary substantially and demonstrate the potential danger in using observed behavior in one year to predict future impacts.

Comments

Letter 803 Comment 306, Letter 803 Comment 334, Letter 803 Comment 335

CC-004-Baseline Data Adequacy

Commenters express concern about the adequacy and extent of the data used in determining the baseline water resources conditions. Commenters identified a number of items. These include climate and precipitation data, historic yield data, and changes in water flow as examples.

Response

The EIS uses the best available baseline data for water resources. To provide more information on baseline data adequacy, the following text has been added to the EIS in Section 3.2.2.1, "Baseline data collection, including surface water monitoring, was initiated in 2005 and continues through the present. The geographic area of monitoring was significantly expanded in 2007 and 2008 beyond the original "five-mile radius" geographic area surveyed between 2005 and 2007. This includes spring and stream sites throughout the Roberts Mountains, spring and stream sites in Pine Valley, and flowing wells and springs on the floor of Kobeh Valley (JBR 2011). The period of baseline monitoring covers a range of seasonal and climatic conditions, including above and below average precipitation years. Specifically, calendar years 2006 and 2008 were below average precipitation, years 2005, 2007, and 2010 were above average, and years 2009 and 2011 were near average, based on precipitation records at Eureka (Eureka COOP weather station). The fluctuations in stream and spring flows observed due to seasonal and longer term climatic variability are described in JBR (2011) and Montgomery et al (2010)."

Additionally, reference to JBR (2011) has been added to the second paragraph in Section 3.2.2.1 of the EIS.

Comments

Letter 855 Comment 26, Letter 855 Comment 27, Letter 855 Comment 28, Letter 855 Comment 30, Letter 855 Comment 34, Letter 855 Comment 35, Letter 855 Comment 46, Letter 859 Comment 56, Letter 859 Comment 59, Letter 859 Comment 60, Letter 859 Comment 61, Letter 859 Comment 75, Letter 859 Comment 94

CC-005-Socioeconomics Cumulative Impacts

Commenter expressed concern about the scope of the cumulative analysis for socioeconomics. There are a number of projects that are located outside the CESA boundary that would add to the population of southern Eureka County.

Response

The text in the twelfth paragraph under Section 4.2 of the EIS has been revised to read, "The CESA for socioeconomic and environmental justice was determined to include those projects and activities that have a potential effect on socioeconomic and environmental justice that occur within the socioeconomic and environmental justice study area (Figure 3.17.1)." Table 4.2-1 has been revised to incorporate the above text in to the "Cumulative Effects Study Area" column for Socioeconomics and for environmental justice. In addition, the "Size of Area" and "Figure Number Reference" columns have been labeled "n/a" for socioeconomic and environmental justice. The Socioeconomics CESA boundary has been removed from Figure 4.2.2.

Comments

Letter 803 Comment 433

CC-006-Local Hydrologic Model

Commenters express concerns about adequacy of the Local (Pit Area) Hydrological Model. The commenters state that the potential impacts to ground water quality are not sufficiently addressed. In addition, the potential effects from the ore processing operations are not addressed.

Response

Modeling has demonstrated that the pit lake would act as a hydraulic sink and provide containment of any post-mining pit lake waters (see Section 3.2.3.3 of the EIS). Pit lake levels would remain below surrounding ground water levels and the pit lake would remain a hydraulic sink. Additionally, the proposed Project includes design features to control generation of leachate from tailings and waste rock and to contain any solutions that are generated.

Comments

Letter 390 Comment 6, Letter 392 Comment 6, Letter 407 Comment 4, Letter 809 Comment 4, Letter 835 Comment 4, Letter 859 Comment 32, Letter 859 Comment 34

CC-007-Regional Hydrological Model

Commenters express concern about the adequacy of the Regional Hydrological Model. The EIS should address all long-term impacts to water sources and all indirect impacts related to the loss of water sources. The EIS cannot exclude analysis of impacts caused by use of underground water.

Response

The EIS provides a thorough analysis and disclosure of potential impacts based on the best available data and a hydrologic model that provides a valid and reasonably accurate projection of drawdown. Data included in the analysis support the conclusion that ground water flow between Kobeh Valley and Diamond Valley is not large due to low conductivity of rocks that comprise the Whistler Range. Thus, impacts to Diamond Valley water rights and the effect on availability of ground water for agricultural uses would likely be insignificant. The EIS does, however, include a complete and thorough description and analysis of potential impacts in Section 3.2.3.

Allocation of water resources to the Project is administered by the State Engineer as authorized under Nevada water law. Ground water appropriations for the Project are granted within the defined perennial groundwater yield (sustainable yield) for Kobeh Valley and, to a lesser extent, Diamond Valley.

Pumping and use of ground water would capture some otherwise naturally occurring discharges of ground water. The Project would capture ground water used by phreatophyte plants on the Kobeh Valley floor, predominantly greasewood shrubs, as summarized in the Impacts to Basin Water Budgets subsection under section 3.2.3.3.2. Other associated direct and indirect impacts, or potential impacts, related to Project pumping and lowering of the water table have been predicted using a peer-review numerical flow model, the results of which are disclosed in the EIS, and include impacts to wells, land surface subsidence, effects to interbasin flow including subsurface flow to Diamond Valley, and potential impacts to streams and springs connected to the water table. These impacts, including the geographic extent, degree, and timing, are discussed in detail in Section 3.2.3.3.2 of the EIS.

Comments

Letter 369 Comment 1, Letter 385 Comment 6, Letter 805 Comment 11, Letter 805 Comment 16, Letter 823 Comment 2, Letter 855 Comment 56, Letter 859 Comment 66, Letter 859 Comment 67, Letter 859 Comment 68, Letter 859 Comment 95, Letter 864 Comment 3, Letter 928 Comment 1

CC-008-EML Mitigation Comments

Commenters express concern regarding the scope of the water quantity mitigation. The use of cessation of flows in the springs and streams was not considered appropriate. Clarification on the source of water for mitigation was requested.