

April 4, 2016

Doug Haywood
BLM Las Cruces District Office

Submitted via email to: BLM_NM_LCDO_Comments@blm.gov

RE: Comments on the Draft EIS for the NMCC Copper Flat Mine

Dear Mr. Haywood,

The Draft EIS for the proposed NMCC project is characterized by numerous unaddressed issues and elements required by the norms of EIS, none more striking to me than the lack of consideration, analysis of, or research about the possible other and potentially better uses for the vast quantity of water claimed by NMCC.

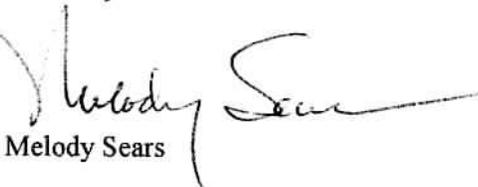
I find no comparative analysis of the amount of water required by other industries, businesses or activities in which beneficial use is inherent, not to mention how many jobs such alternative beneficial-use industries, businesses or activities would add to the economy. Similarly unaddressed is the comparative tax revenue such alternatives would bring to Sierra County.

There is a dearth of data and analysis of Sierra County's economic future. For example, would expansion of such activities as agriculture (for which infrastructure is already in place) or tourism based on our unique landscape (Geronimo Scenic Trail route, historic places, birding sites and other attractions in or adjacent to the NMCC property) use geometrically less water and produce manifestly less environmental risk to roads and other public infrastructure and spaces, while having equal or greater positive economic impact?

Or for another analysis, how much would 12 years' of water use for two new hotels, four new restaurants, an RV park, and 10 new retail shops in Truth or Consequences and Hillsboro* (for which water would be returned to the aquifer) compare with 12 years' operation of NMCC?

One could provide many more examples of categories of comparative analysis not performed and issues left unaddressed by the Draft EIS. I urge the BLM to re-do the EIS, perform its mandates and meet the norms of a fully developed EIS accordingly.

Sincerely,



Melody Sears

*See "Lonely Planet Names Southern New Mexico as a top U.S. destination", Albuquerque Business First, <http://www.bizjournals.com/albuquerque/news/2016/02/09/major-travel-guide-names-this-new-mexico-area-a.html>