

1 INTRODUCTION: PURPOSE OF AND NEED FOR ACTION

1.1 Introduction and Location

Eureka Moly, LLC (EML) plans to develop the Mount Hope Project (Project) in central Nevada approximately 23 miles northwest of Eureka, Nevada, as shown in Figure 1.1.1. The Project would be located on public land administered by the Bureau of Land Management (BLM) and on private land controlled by EML (Figure 1.1.2). The specifics of the Project are outlined in the Project Plan of Operations (NVN-082096) (Plan) submitted in June 2006, and most recently revised in July 2011, which is on file and available for review at the BLM Mount Lewis Field Office (MLFO) in Battle Mountain, Nevada, during normal business hours (Monday through Friday, excluding holidays, from 7:30 a.m. to 4:30 p.m.). In addition, EML has submitted to the MLFO a right-of-way (ROW) Application and associated Plan of Development (POD) for portions of the planned Project activities. The ROW Application and POD (NVN-084632) were submitted in January 2008 for the 230-kilovolt (kV) transmission line from the Machacek Substation to the Project Substation located near the proposed mill. The ROW Application and POD are on file and available for review at the BLM MLFO in Battle Mountain during normal business hours. **There would be two ROWs associated with the powerline. The first is a short-term ROW (NVN-091272) associated with powerline construction. The second ROW is a long-term ROW (NVN-084632) for operation of the powerline. The boundary of the long-term ROW is within the boundary of the short-term ROW.** There would also be a ROW Application associated with the reroute of the 345-kV Falcon-Gondor transmission line. This ROW Application would modify the existing ROW (NVN-063162), which would be filed at the time the modified ROW is needed for the reroute in approximately Year 36. The 80-year Project would have an 18- to 24-month construction phase, 44 years of mining and ore processing, 30 years of reclamation, and five years of post-closure monitoring. The years of operation presented in this Environmental Impact Statement (EIS) are anticipated or nominal, and there is a potential the timing on the implementation or duration of components of the Project could vary.

The Project is located in all or parts of Mount Diablo Base and Meridian (MDBM), Township 20 North, Range 50 East, Sections 2-5, (T20N, R50E, Secs. 2-5); T20N, R52E, Secs. 5, 8, 9, 16, 21, 26-28, 34-36; T20N, R53E, Secs. 31-35; T21N, R50E, Secs. 1-3, 11-14, 23, 25, 26, 32-36; T21N, R51E, Secs. 1, 7, 8, 12, 16-18, 31; T21N, R52E, Secs. 4-9, 18-20, 29, 32; T21½N, R51½E, All; T21½N, R52E, Secs. 4-6; T22N, R50E, Secs. 25, 36; T22N, R51E, Secs. 1, 2, 11-15, 20-26, 28-36; T22N, R51½E, All; T22N, R52E, Secs. 6-8, 17-20, 29-32; T23N, R51E, Secs. 25, 35, 36 (Project Area). The Project Area, which covers **22,886** acres, includes the Mine Facility Area, ROW, and the well field development area (Figure 1.1.2). EML's holdings include 14 patented claims (approximately 260 acres of private land) and approximately 1,550 lode and millsite mining claims for a total land position of approximately 29,000 acres.

The Project Area can be reached by traveling on State Route (SR) 278 approximately 23 miles northwest of the Town of Eureka, Nevada. Alternatively, the Project Area can be reached by traveling south approximately 65 miles on SR 278 from Carlin, Nevada.

The proposed mining activities, which would be located on public lands, would be subject to BLM review and approval pursuant to the Federal Land Policy and Management Act (FLPMA) and subsequent surface management regulations (43 Code of Federal Regulations [CFR], Subpart 3809), as well as ROW principles and procedures (43 CFR, Subpart 2800). These

activities constitute a federal action and would thus be subject to the National Environmental Policy Act (NEPA). The BLM has determined that the Project constitutes a major federal action and has determined that an EIS must be prepared to fulfill NEPA requirements. In determining the scope of the Proposed Action, the BLM has determined that actions on private lands are connected actions with those proposed on public lands (40 CFR 1502.4 (2) and 40 CFR 1508.25(a)). This EIS will also analyze impacts from private land activities.

This **Final** EIS has been prepared by the BLM, the Lead Agency with respect to compliance with the NEPA and its implementing regulations, and with the following cooperating agencies: Nevada Department of Wildlife (NDOW), Eureka County, and the National Park Service (NPS). The purpose of this document is to analyze the environmental effects of the Proposed Action, associated with the proposal by EML to develop the Mount Hope open pit mine, as well as alternatives to the Proposed Action.

The purposes of an EIS are as follows: a) to analyze potential impacts from the Project based on the Proposed Action; b) to identify reasonable alternatives; c) to inform the public about the Project; d) to solicit public comment on the Project and alternatives; and e) to provide agency decision makers with adequate information upon which to base the decision to approve or deny the Project or an alternative development scenario.

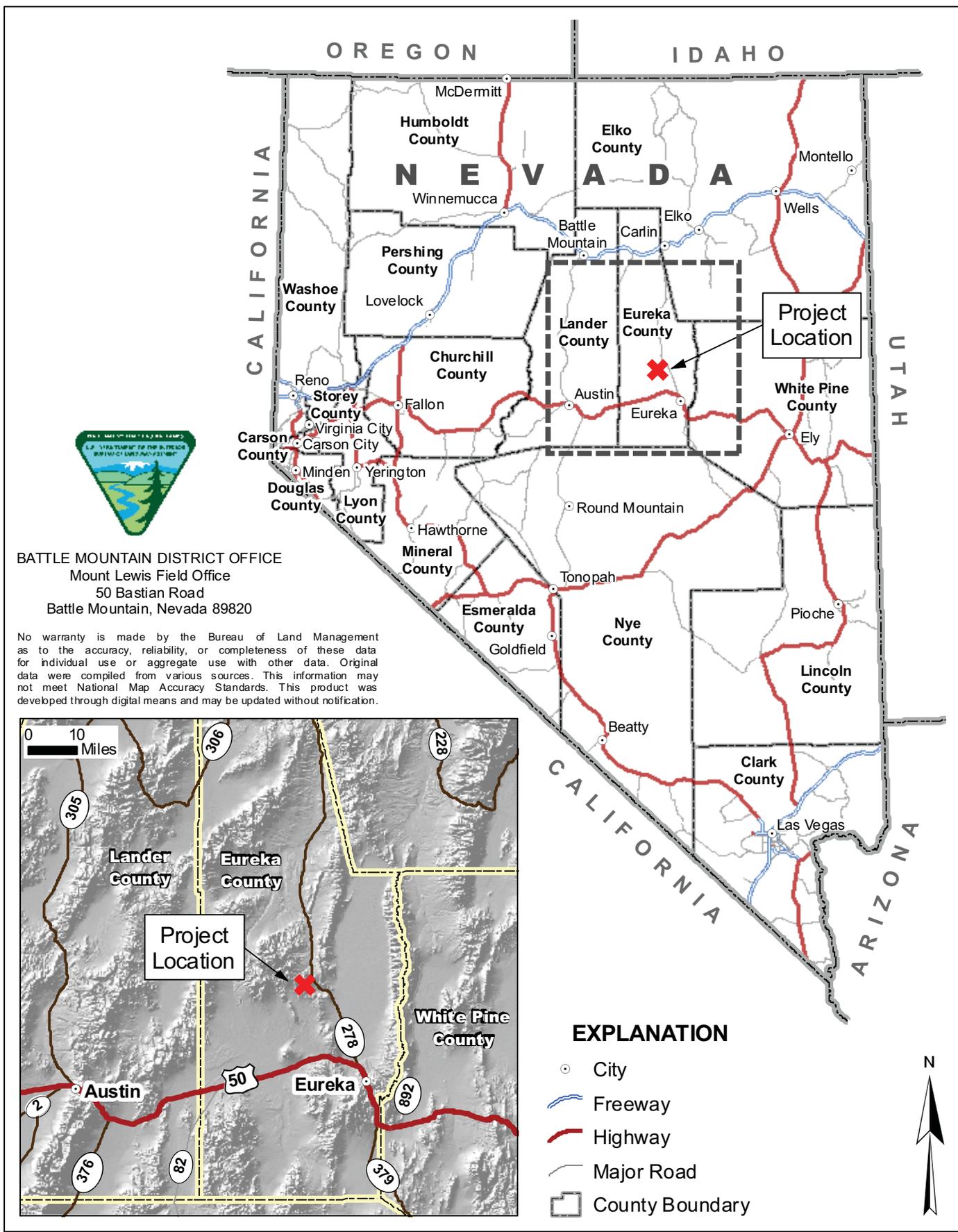
The EIS is prepared in compliance with the NEPA and in accordance with BLM's NEPA Handbook H-1790-1 (BLM 2008a), BLM Nevada State Office (NSO) Instruction Memorandum (IM) NV-90-435, and Council on Environmental Quality (CEQ) regulations on the analysis of cumulative impacts (40 CFR 1500). The EIS considers the quality of the natural environment based on the physical impacts to public and private lands that may result from implementation of the Proposed Action. All baseline data reports used in the preparation of the EIS are on file at the BLM MLFO.

All the spatial data presented in the figures and tables of this EIS are based on North American Datum (NAD) 83 georeferencing.

1.2 Project Background and History of Mining

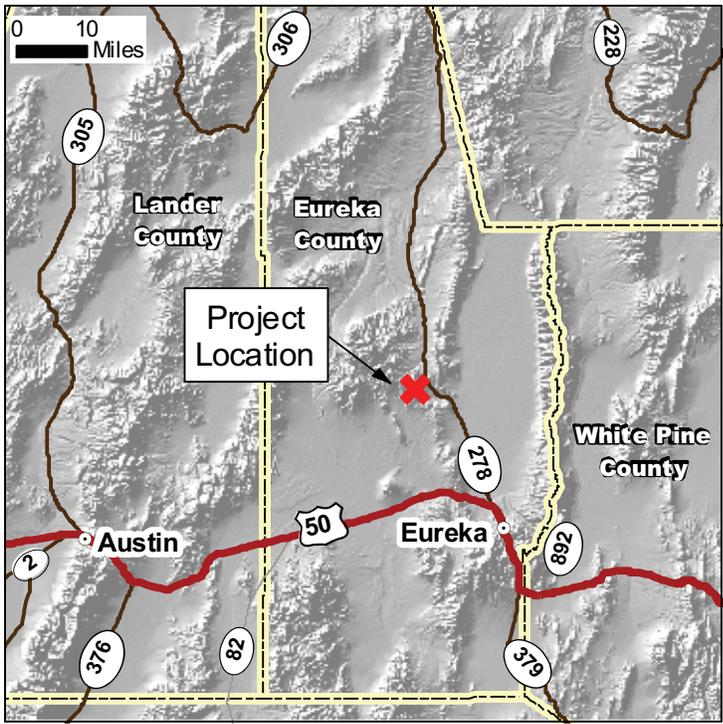
Historical mining occurred within the Project Area from the 1870s through the 1940s. Exxon Minerals Corporation conducted exploration activities in the late 1970s through the early 1980s. Currently, EML is conducting exploration operations within the Project Area.

Disturbances associated with historic mining operations are located primarily on private land (patented claims). These disturbances consist of a core shed and storage building surrounded by a fence, underground mining operations, **waste rock disposal facilities (WRDFs)**, and mill tailings. Some relatively small waste rock piles remain on the property, as well as three adits. One of these adits drains to a small man-made stock pond. Numerous historic mine workings are located throughout the Project Area, including unsecured and abandoned shafts, adits, open stopes, drifts, and prospects. The Project Area includes three historic mill tailings impoundments and one overflow tailings containment impoundment, all of which were associated with the ore concentrating activities conducted at the mine site during the 1940s. The three tailings impoundments contain approximately 25,000 cubic yards (yd³) of spent tails. The largest of the three tailings impoundments, measuring approximately 300 feet wide by 550 feet long, contains



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 Mount Lewis Field Office
 50 Bastian Road
 Battle Mountain, Nevada 89820

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- EXPLANATION**
- City
 - ▬ Freeway
 - ▬ Highway
 - ▬ Major Road
 - ▭ County Boundary



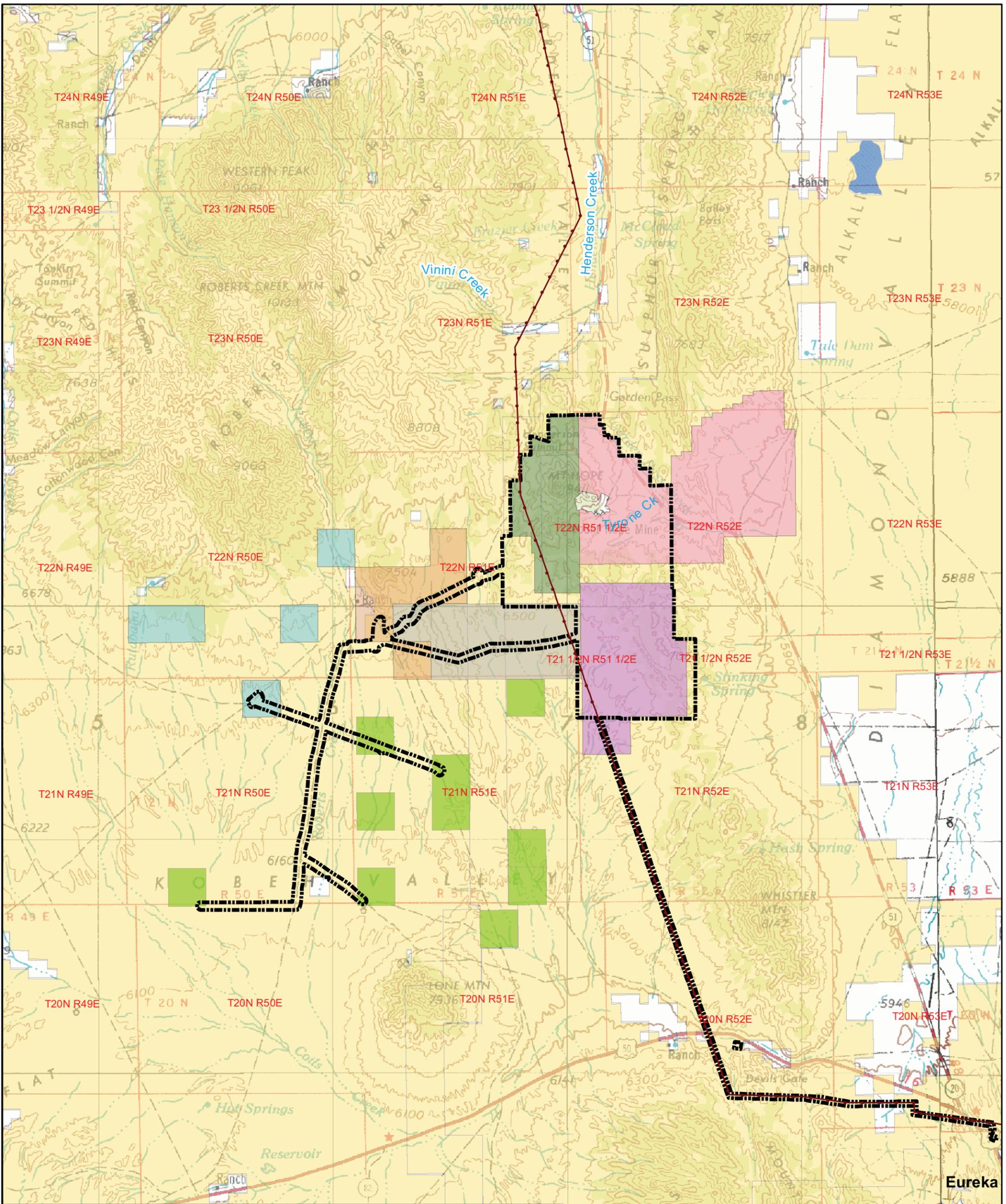
0 20 40 60 80 100 Miles

BUREAU OF LAND MANAGEMENT
MOUNT HOPE PROJECT

General Location Map

DESIGN: EMLLC	DRAWN: BVB/GSL	REVIEWED: VS/RFD
SCALE:	DATE: 8/11/2011	
FILE NAME: p1635_Fig 1-1-1_GeneralLocationMap.mxd		

Figure 1.1.1



EXPLANATION

- Falcon-Gondor Power Line
- Project Boundary
- Notice Boundaries**
- NVN 080914
- NVN 081485
- NVN 087312
- NVN 083245
- NVN 083246
- NVN 081811
- NVN 090831
- Land Status**
- Public Land
- Private Land
- Water



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DESIGN:	EMLLC	DRAWN:	CVD/GSL	REVIEWED:	RFD
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BUREAU OF LAND MANAGEMENT
MOUNT HOPE PROJECT

DRAWING TITLE:

Project Area and Land Ownership
Figure 1.1.2

Eureka

no vegetative cover. Scattered vegetation, consisting primarily of sagebrush, is present on the remaining two tailings impoundments, which measure approximately 250 feet by 175 feet and 400 feet by 150 feet.

All three tailings impoundments range in depth from less than three feet to approximately 16 feet. The overflow tailings containment impoundment measures approximately seven feet by 16 feet and is located southwest of the former mill. This impoundment was utilized to contain any spills from the mill and is currently estimated to contain approximately two yd³ of material. The center of the impoundment is void of vegetation; however, the edges of the impoundment contain sparse vegetation. The tailings were characterized in 1995 (Westec 1995) using the Meteoric Water Mobility Procedure (MWMP) to determine whether or not the contained constituents were mobile. The preliminary investigation indicated that the tailings material did not have the potential to degrade the waters of the State of Nevada.

1.3 Existing Activities and Facilities

EML is presently conducting activities under Notices within the Project Area. These activities include condemnation drilling (i.e., drilling to confirm that no valuable minerals occur in the area drilled), installation of water quality monitoring wells to determine hydrogeochemical properties for studies used in the development of the Plan, and collection of information on geotechnical conditions underneath the proposed waste rock storage areas and tailings impoundments. EML also has Notices outside the Project boundary that are associated with water supply exploration activities. All Notices within and outside the Project Area are shown on Figure 1.1.2 and in Table 1.3-1. Notice NVN-087312 is located completely within the Plan boundary and would be retired upon Plan approval. All other Notices would remain open, although the disturbance associated with these individual Notices would be decreased due to a portion of them being subsumed by the Plan. These Notices are presently active and may be used to conduct additional exploration between the present time and the acceptance of the Plan. The remaining disturbance associated with Notices partially subsumed by the Plan would be determined and provided by EML as modification to the respective Notices once the Plan is approved. The disturbance associated with these Notices that remains within the Plan boundary would be bonded within the 50 acres of exploration disturbance provided.

Table 1.3-1: Legal Description of Notices Held by EML

Serial Number	Surface Disturbance (acres)*	Township, Range
NVN-080914	5	22N, 51E; 22N, 52E
NVN-081485	5	21N, 52E
NVN-081811	5	20N, 51E
NVN-087312	5	22N, 51E; 22N, 52E
NVN-083245	5	22N, 51E
NVN-083246	5	21N, 50E; 22N, 50E
NVN-090831	5	22N, 51E; 21.5N, 51E

*A conservative estimate of five acres per Notice is assumed.

EML controls the private land associated with previous mining activities. Cultural resource surveys of the Project Area were conducted during 2006, 2007, and 2008 to identify features that may be eligible for the National Register of Historic Places (NRHP) (Malinky 2006; Malinky 2008; Malinky et al. 2008).

1.4 Purpose of and Need for the Action

The BLM is responsible for administering mineral rights access on certain federal lands as authorized by the General Mining Law of 1872. Under the law, qualified prospectors are entitled to reasonable access to mineral deposits on public domain lands, which have not been withdrawn from mineral entry.

Under the FLPMA, the BLM is authorized to issue ROWs on public lands. Under this law, and the implementing regulations at 43 CFR 2800, qualified individuals can obtain ROWs on public lands.

The purpose of the Project is to profitably extract molybdenite from public lands where EML holds mining claims and private land to the optimal extent possible. **The Project need is to meet the prevailing market demand for molybdenum (Mo). The prevailing market demand is regularly adjusted at market exchanges throughout the world. This adjustment results from buyers and sellers agreeing on a specific transaction price, which reflects the current supply and demand for the commodity and other factors.**

The purpose and need for the federal action is multifold. One aspect of the purpose and need is established by the BLM's responsibilities under the FLPMA to respond to a request for a Plan of Operations for the applicant to exercise their rights under the General Mining Law, and an application for a ROW under FLPMA. Other aspects of the purpose and need of the federal action are: (1) to further the "Minerals" objective of the applicable resource management plan, which is to "[m]ake available and encourage development of mineral resources to meet national, regional, and local needs consistent with national objectives for an adequate supply of minerals"; and (2) to provide for mining and reclamation of the Project Area in a manner that is environmentally responsible and in compliance with federal mining laws, the FLPMA, Nevada Mine Reclamation Law, and other applicable laws and regulations.

1.5 BLM Responsibilities and Relationship to Planning

The BLM has the responsibility and authority to manage the surface and subsurface resources on public lands located within the jurisdiction of the MLFO. The public lands within the Project Area are designated as open for mineral exploration and development. This **Final** EIS was prepared in conformance with the policy guidance provided in BLM's NEPA Handbook (BLM Handbook H-1790-1) (BLM 2008a). The BLM Handbook provides instructions for compliance with the CEQ regulations (40 CFR 1500) for implementing the procedural provisions of the NEPA and United States (U.S.) Department of the Interior's (USDOI's) manual on NEPA (516 DM 1-7).

1.5.1 Resource Management Plan

The Proposed Action conforms with the BLM's Shoshone-Eureka Resource Management Plan (RMP), as amended, dated March 1986 (BLM 1986a). Specifically, on page 29 in the RMP Record of Decision (ROD), under the heading "Minerals" subtitled "Objectives" number 1:

"Make available and encourage development of mineral resources to meet national, regional, and local needs consistent with national objectives for an adequate supply of minerals."

Under "Management Decisions," "Locatable Materials," page 29, number 1:

"All public lands in the planning areas will be open for mining and prospecting unless withdrawn or restricted from mineral entry."

Under "Management Decisions," number 5, Current Mineral Production Areas:

"Recognize these areas as having a highest and best use for mineral production and encourage mining with minimum environmental disturbance..."

1.5.2 Surface Management Authorizations and Relevant Plans

BLM regulations for surface management of public lands mined under the General Mining Law of 1872, as amended (43 CFR 3809) recognize the statutory right of mineral claim holders, such as EML, to explore for and develop federal mineral resources and encourage such development. These federal regulations require the BLM to review proposed operations to ensure that the following items are included: a) adequate provisions to prevent unnecessary or undue degradation of public lands; b) measures to provide for reclamation; and c) operations comply with other applicable federal, state, and local laws and regulations. EML submitted a Plan for the Project to the BLM in June 2006, revised September 2006, June 2007, May 2008, June 2008, July 2008, January 2009, October 2009, January 2010, July 2010, January 2011, July 2011, **and July 2012** (EML 2006) as required under the regulations. The EML Plan is on file and available for review during normal business hours at the BLM's MLFO.

The General Mining Law of 1872 allows individuals to locate and patent mining claims, such as lode claims. Since 1994, Congress has maintained a moratorium on BLM processing of mineral patent applications. Under the mill site provision, 30 U.S. Code (U.S.C.) 42, no location of a claim on nonmineral lands, called mill sites, may exceed five acres each. Under 43 CFR Sec. 3832.32, the maximum size of an individual mill site is five acres; however, more than one mill site per mining claim can be located if each site is used for at least one of the purposes described in 43 CFR Sec. 3832.34. The amount of located mill site acreage is that which is reasonably required for use or to be occupied for efficient and reasonably compact mining or milling operations.

The FLPMA [43 U.S.C. 1761] allows individuals to use public lands for powerlines, as well as other linear features (roads, pipeline, etc.), through the issuance of a ROW by the BLM.

1.5.3 Site Reclamation Requirements

The Mining and Mineral Policy Act of 1970 (MMPA) mandates federal agencies to ensure that closure and reclamation of mine operations are completed in an environmentally responsible manner. The MMPA states that the federal government should promote the following:

“...development of methods for the disposal, control, and reclamation of mineral waste products, and the reclamation of mined lands, so as to lessen any adverse impact of mineral extraction and processing upon the physical environment that may result from mining or mineral activities.”

The BLM’s long-term reclamation goals are to shape, stabilize, revegetate, or otherwise treat disturbed areas in order to provide a self sustaining, safe, and stable condition providing productive use of the land, which conforms to the approved land use plan for the area. The BLM’s long-term goals also include management of any discharges from process components. The short-term reclamation goals are to stabilize disturbed areas and to protect both disturbed and adjacent undisturbed areas from unnecessary or undue degradation. Relevant BLM policy and standards for reclamation are set forth in the BLM Solid Minerals Reclamation Handbook (BLM Manual Handbook H-3042-1), which provides consistent reclamation guidelines for all solid non-coal mineral activities conducted under the authority of the BLM Minerals Regulations in Title 43 CFR 3809 (BLM 1992). The BLM has reviewed the site reclamation portions of the Plan to ensure that the Project would meet BLM reclamation standards and goals. The Project would also be required to obtain a reclamation permit from, and meet the reclamation standards of, the State of Nevada Department of Conservation and Natural Resources, Nevada Division of Environmental Protection (NDEP), Bureau of Mining Regulation and Reclamation (BMRR).

1.5.4 Local Land Use Planning and Policy

The Eureka County 1973 Master Plan, updated in 2000 and again in 2010, contains a description of land uses, restrictions on development, and recommendations for future land use planning. The Eureka County Master Plan 2010 included an Economic Development Element which incorporated recommendations for increased land use planning that expands and diversifies the County’s economy. The Natural Resources and Federal or State Land Use Element was developed and included into the **Master Plan** in response to Nevada Senate Bill (**SB**) 40, which was passed in 1983, which directs counties to develop plans and strategies for resources that occur within lands managed by federal and state agencies. Policies within the Eureka County Master Plan promote the expansion of mining operations/areas. **Some elements of the Proposed Action would be in conformance with Eureka County plans and policies while other elements of the proposed mine could prove inconsistent with these plans and policies. Appendix A outlines these inconsistencies between the Project and the Eureka County Master Plan. The BLM acknowledges that EML would have to comply with any applicable Eureka County codes.**

The Natural Resources and Federal or State Land Use Element is an executable policy for natural resource management and land use on federal and state administered lands in Eureka County. This element is designed to accomplish the following: 1) protect the human and natural environment of Eureka County; 2) facilitate federal agency efforts to resolve inconsistencies between federal land use decisions and County policy; 3) enable federal and state agency

officials to coordinate their efforts with Eureka County; and 4) provide strategies, procedures, and policies for progressive land and resource management (Eureka County 2010).

1.6 Authorizing Actions

Scoping process information and subsequent discussions with various agencies have identified certain authorizing actions as required, or potentially required, prior to construction or operation of the Project. A list of these authorizing actions organized by agency is provided in Table 1.6-1.

Table 1.6-1: Summary of Environmental Permits and Approvals Required for the Project

Permit/Approval	Granting Agency	Permit Number	Date Issued	Status
Plan of Operations	USDOI, BLM	n/a	n/a	Revised Plan of Operations submitted July 2012.
Reclamation Bond Determination	USDOI, BLM and Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Mining Regulation and Reclamation	n/a	n/a	Revised Reclamation Plan, reclamation cost estimate, and permit application submitted July 2012.
Right-of-Way	USDOI, BLM	n/a	n/a	Revised Plan of Development and application for ROW grant submitted July 2012.
Utility Environmental Protection Act Permit	Nevada Public Utilities Commission	n/a	n/a	Application submitted to Nevada Public Utilities Commission in February 2008 and assigned Docket # 08-01016).
Permit to Operate (Air Quality)	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Air Pollution Control	AP 1061-2469	May 29, 2012	n/a

Permit/Approval	Granting Agency	Permit Number	Date Issued	Status
Water Pollution Control Permit	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Mining Regulation and Reclamation	NEV 2008106	n/a	Draft permit released for internal review in June 2012.
Permit for Reclamation	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Mining Regulation and Reclamation	n/a	n/a	Revised Reclamation Plan, reclamation cost estimate, and permit application submitted July 2012.
Permit to Appropriate Water	Nevada Department of Conservation and Natural Resources, Division of Water Resources	Numerous permit numbers	Nevada State Engineer Ruling #6127 issued June 15, 2011.	n/a
Industrial Artificial Pond Permits	Nevada Department of Wildlife	n/a	n/a	Need for permit pending a NDOW determination of the potential for tailings water to be toxic to wildlife.
Solid Waste Class III Landfill Waiver	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Waste Management	n/a	n/a	Application submitted in August 2012.
Septic Treatment Permit	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Water Pollution Control	n/a	n/a	Application would be developed as infrastructure design is finalized and issuance of ROD allows site disturbance to conduct percolation tests.
Drinking Water Supply	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Safe Drinking Water	n/a	n/a	Application to be submitted upon completion of potable water system design in late 2012.

Permit/Approval	Granting Agency	Permit Number	Date Issued	Status
General Discharge Permit (Storm Water)	Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, Bureau of Water Pollution Control	n/a	n/a	An extension of the previous approval of the jurisdictional survey conducted in 2007 would negate the need for this permit due to the absence of Waters of the U.S.
Powerline Rerouting (Right-of-Way Amendment)	USDOI, BLM	n/a	n/a	This permit would not be necessary until Year 34 of the Project.
Explosive Permit	Bureau of Alcohol, Tobacco, Firearms, Explosives	n/a	n/a	Permit application was submitted in June 2012.
Hazardous Materials Storage Permit	State of Nevada, Fire Marshal Division	n/a	n/a	Permit application would be developed after details of material storage are finalized, anticipated in late 2013.
Hazardous Waste Identification Number	U.S. Environmental Protection Agency	Generator ID # NVR000081349	July 18, 2006	n/a
Encroachment Permit	Nevada Department of Transportation, District III	n/a	n/a	Permit application to be developed after design of additional safety lanes is completed, anticipated to be in 2012.
Liquefied Petroleum Gas License	Nevada Board of the Regulation of Liquefied Petroleum Gas	n/a	n/a	Permit application would be developed after ROD issuance to allow site surface disturbance to complete compaction tests.
Radioactive Material License ¹	Nevada Bureau of Health Protection Services	n/a	n/a	Permit application would be developed after selection of specific sensors to be used in the process, anticipated to be in 2013.
Permit to Construct Tailings Impoundments	Nevada Department of Conservation and Natural Resources, Division of Water Resources	J-623 and J-653	October 25, 2010	n/a

Permit/Approval	Granting Agency	Permit Number	Date Issued	Status
Permit to Operate	Nevada State Minerals Commission, Division of Minerals	n/a	n/a	Registration is required within 30 days of the start of operations, after which the Permit to Operate would be issued.

¹ A radioactive material license may be required if nuclear flow and mass measuring devices are used in the mill and ore reclaim tunnels.

1.7 Environmental Review Process

A Project Scoping Summary documents activities conducted during the scoping process. The summary addresses the issues and concerns identified by the public during the scoping process. The Scoping Summary outlines the key issues identified during scoping and that the BLM deems to be necessary for analysis in the EIS, as well as those concerns not considered critical effects of the Proposed Action. The Scoping Summary is on file and available for review during normal business hours at the BLM’s MLFO.

A Notice of Intent (NOI) to prepare this EIS was published in the Federal Register (FR) on March 2, 2007. The NOI invited scoping comments to be sent to the BLM through April 6, 2007. Also on March 2, 2007, copies of a news release entitled “Notice of Intent to Prepare an Environmental Impact Statement to Analyze the Proposed Action for the Mount Hope Project” were submitted to three northern Nevada newspapers (Humboldt Sun in Winnemucca, Battle Mountain Bugle in Battle Mountain, and the Elko Daily Free Press in Elko, Nevada) and to major interest groups. Public scoping meetings for the Project were held on March 27, 2007, and March 28, 2007.

The meeting on March 27, 2007, was held in Eureka, Nevada, at the Eureka Opera House. A total of five members of the public attended this meeting, and no written comments were received.

The meeting on March 28, 2007, was held in Battle Mountain, Nevada, at the BLM MLFO. A total of 30 members of the public attended this meeting, and one written comment was provided.

Five additional comment letters were received via mail or email during the public scoping period, and three letters were received in July 2007 after the close of the scoping comment period.

Comment letters received during and after the public scoping period have been included in the Scoping Summary and follow-up summaries, which are on file and available for review during normal business hours at the BLM’s MLFO. As a result of the public scoping process, the following potential issues of concern were identified by the public:

- General Project Issues
 Scope of project
 Length of project

- Size of project
- Reclamation requirements
- Financial guarantees
- Mitigation measures
- Long range plans
- Protection of resources
- Sustainability
- Alternatives to the Project
- Operational performance standards
- Waste management
- Cumulative impacts
- Loss of ecosystem
- Change in local microclimate
- Land restoration
- Soils and Watershed Issues
 - Impacts from increased erosion
 - Impacts to soils from a chemical release (surface or air)
 - Impacts to the quality of soils for restoring wildlife habitat and values
- Livestock Grazing and Production Issues
 - Impacts to access for permittees
 - Impacts to forage levels
 - Impacts to grazing allotments
 - Impacts to utilization levels
 - Impacts to animal unit months
- Water Resource Issues
 - Impacts to regional hydrology
 - Impacts to surface waters from toxic effluents and residues
 - Impacts to ground water chemistry
 - Impacts from acid generation
 - Impacts to seeps and springs
 - Impacts from ground water pumping
 - Impacts to future pit water quality
 - Impacts from infiltration activities
 - Impacts to stream flows/surface flows
 - Impacts to wetlands
 - Impacts to aquifer level
 - Impacts of water in the pit during mining operations
 - Impacts to waters of the U.S.
 - Impact of ground water recharge following mine closure
 - Impacts from sediment loads to streams
 - Water quantity
 - Use of Water
 - Co-mingling of aquifers
 - Impacts of catastrophic event on surface waters and ground water
 - Maintenance of water lines

- Impacts to water rights
 - Impacts to water quality
 - Impacts from water discharge
 - Impacts from mine drainage
 - Impacts to drainage patterns
 - Impacts from erosion and sedimentation
 - Impacts from flash floods
 - Flood plain recognition
 - Impacts from surface water, rain, or snow melt percolating through mine facilities

 - Air Resource Issues
 - Impacts to air quality
 - Impact of mercury and other hazardous air pollutants emissions

 - Wildlife and Fisheries Resource Issues
 - Impacts to threatened and endangered species
 - Impacts to terrestrial and aquatic wildlife and habitats
 - Impacts to wildlife from hazardous materials and toxic solutions
 - Impacts to breeding, nesting, and cover habitats of wildlife
 - Impacts to wildlife diversity
 - Impacts to native flora
 - Impact of tailings facility on wildlife resources
 - Impacts of pit water quality on wildlife
 - Impacts to wildlife from Project-generated noise
 - Reclamation impacts to wildlife
 - Impact to riparian areas
 - Wildlife access to water
 - Impacts to wildlife from mining operations
 - Impacts to hunting and wildlife viewing opportunities
 - Impacts to wildlife forage areas
 - Impacts to wildlife migration routes
 - Impacts to springs utilized by wildlife
 - Impact to bats and bat habitat

 - Wild Horse Issues
 - Impacts to wild horses from mining operations
 - Impacts to wild horse foraging
 - Impacts to wild horse management and allowable management levels
 - Impacts to wild horse habitat and available acreages
 - Impacts due to vehicular collisions with wild horses
 - Impacts to herd management areas
 - Impacts to free roaming behavior
 - Impacts to wild horses due to water right transfers
 - Impacts to water sources that wild horses use

 - Cultural Resources and Native American Traditional Value Issues
 - Impacts on Native American cultural sites
 - Impacts on historic sites
-

- Impacts on pine nut harvesting areas
- Impacts to Native American Traditional Values
- Geology Issues
 - Impacts of seismic activity on Project components
 - Characterization of waste rock
- Visual Resource Issues
 - Impacts to visual resources
 - Impacts from lighting
 - Impacts from color of facilities
 - Impacts to line and form
 - Impacts to the Pony Express Historic Trail
- Auditory Resource Issues
 - Impacts from Project-related noise
- Land Use, Access, and Public Safety Issues
 - Impacts to public safety
 - Impacts to local traffic
 - Impacts to access for the public
- Recreation and Wilderness Issues
 - Impacts to wilderness resources
 - Impacts of potential use of pit lake as a recreation site
 - Impacts to recreation and hunting
- Socioeconomic Values and Public Services Issues
 - Impacts to public services and infrastructure
 - Impacts on economics in Eureka County
 - Impacts on economics in State of Nevada
 - Impacts from employee housing
 - Impacts to the Town of Eureka
- Hazardous Material Issues
 - Impacts from releases of hazardous materials
- Environmental Justice Issues
 - Impacts to minority and low income populations

All of the above identified issues or concerns have been outlined in the Scoping Summary or the **Final** EIS. The scoping comments were reviewed for relevance to the Proposed Action, and those which addressed potential impacts of the Proposed Action have been included in the **Final** EIS.