

BAGDAD MINE STOCKPILE EXTENSION PROJECT

SCOPING REPORT

Prepared for

U.S. Department of the Interior
Bureau of Land Management
Kingman Field Office

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ACRONYMS AND ABBREVIATIONS

AGFD	Arizona Game and Fish Department
APS	Arizona Public Service Company
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
EA	environmental assessment
EIS	environmental impact statement
FLPMA	Federal Land Policy and Management Act
FMBI	Freeport-McMoRan Bagdad Inc.
KOP	key observation point
kV	kilovolt(s)
MPO	Mine Plan of Operations
MPO Modification	<i>Bagdad Mine Stockpile Extension Modification to the Mine Plan of Operations</i>
MW	megawatt(s)
NEPA	National Environmental Policy Act
ROW	right-of-way
Stockpile	Plan IX Leach/South Waste Rock Stockpile



1.0 INTRODUCTION

1.1 Background

The Bureau of Land Management (BLM) is undertaking the National Environmental Policy Act (NEPA) process to analyze the impact of the proposed Bagdad Mine Stockpile Extension Project. A proposal has been submitted to the BLM Kingman Field Office by Freeport-McMoRan Bagdad Inc. (FMBI) to modify their Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona. The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the installation of limited, future distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to maintain a 115-kilovolt (kV) power line within the same geographic area of the MPO modification. The MPO modification and ROW amendment propose new surface disturbance to approximately 600 acres of public land managed by the BLM and approximately 90 acres of private land.

The NEPA process is being undertaken to analyze and disclose to the public the environmental, social, and economic impacts of the proposed project. The NEPA document will be prepared in compliance with the National Environmental Policy Act of 1969, as amended; Council on Environmental Quality regulations implementing NEPA; Federal Land Policy and Management Act (FLPMA) of 1976; and other applicable laws and regulations. The BLM is the lead agency preparing the NEPA document, in cooperation with other federal, state, local, and tribal governments and government agencies. The FMBI and APS proposals will be analyzed under either a NEPA environmental assessment (EA) or environmental impact statement (EIS), depending upon the significance of issues identified.

On October 6, 2014, the BLM mailed a scoping notice (Appendix A) to a mailing list of interested persons, organizations, and government agencies to begin the external scoping process for the proposed project.

1.2 Purpose and Need

The BLM's purpose and need for the proposed NEPA project, as presented in the scoping meetings, is as follows:

- BLM's purpose is to provide FMBI a location for their requested stockpile and distributed facilities to ensure compliance with BLM's 43 Code of Federal Regulations (CFR) 3809 and 3715 regulations. The purpose is also to analyze and consider whether or not to amend APS's ROW to provide the maintenance access requested to assure compliance with the 43 CFR 2800 regulations. The need is established under FLPMA to respond to a technically complete Modification to a Mining Plan of Operations and a request for ROW amendment for legal access.

1.3 Location

The proposed Bagdad Mine Stockpile Extension Project is located in Yavapai County in central Arizona (Figure 1).



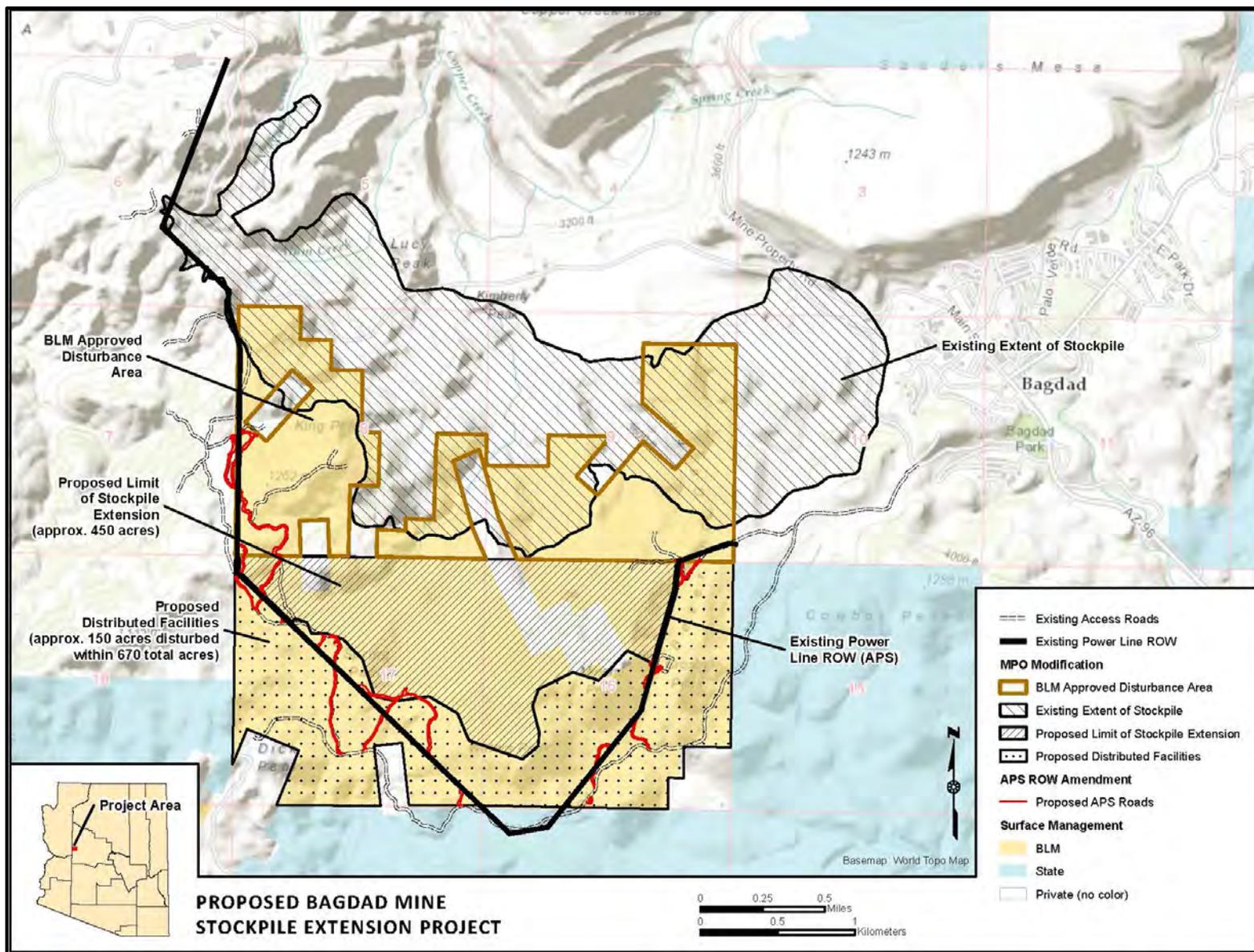


Figure 1. Project location map.



1.4 Description

The project description presented below was presented to the public during the scoping process. Some minor changes to the project description may occur in the future through the NEPA process.

FMBI owns and operates the copper mining operation at the Bagdad Mine, located approximately 100 miles northwest of Phoenix, in western Yavapai County, Arizona. Mining has occurred in the Bagdad area since the early 1880s, and open pit mining began in 1945. The majority of the existing Bagdad Mine operations and facilities are situated on private lands. However, some Bagdad Mine operations are conducted on BLM lands under an existing 1996 MPO (as amended), *Plan of Operations for Upper Mammoth Tailings & South Waste Rock Disposal Facilities* (FMBI 1996). Approximately 671 acres of BLM-managed lands in Sections 8 and 9, Township 14 North, Range 9 West have been previously approved for disturbance through the approval of the 1996 MPO and subsequent amendments (see Figure 1 – BLM approved disturbance area).

The BLM accepted the *Bagdad Mine Stockpile Extension Modification to the Mine Plan of Operations* (MPO Modification) (FMBI 2014) as technically complete in June 2014. The MPO Modification seeks to modify the 1996 MPO (as amended) for the extension of the existing consolidated Plan IX Leach/South Waste Rock Stockpile (the Stockpile) located in Sections 16 and 17, Township 14 North, Range 9 West (see Figure 1). The proposed extension includes increasing the existing Stockpile by approximately 450 acres onto BLM-managed lands and would allow for the construction, operation, closure, and post-closure of the proposed Stockpile extension. The operation of the expanded Stockpile would continue in the same manner as the existing Stockpile. The Stockpile would be extended by both height and width. The conceptual design plan for the Stockpile illustrates a height of approximately 1,200 feet, extending to approximately 4,850 feet above mean sea level. Overburden and mineralized waste rock materials from the open pit will continue to be placed on the Stockpile by haul trucks. Leaching would occur on the western, Plan IX Leach portion of the Stockpile, and overburden/mineralized waste rock would be stored on the eastern, South Waste Rock portion of the Stockpile. The southern boundary of the proposed stockpile extension generally corresponds to a drainage divide (ridgeline); stockpiled materials would not be placed south of this divide. Stormwater runoff from the stockpile extension would continue to be directed to the existing open pit to the north. The proposed Stockpile extension has an anticipated operational life of approximately 40 years. This proposal would not change FMBI's ongoing mining operation. Copper production, mine staffing, water use, etc., would not change as a result of the proposed stockpile extension.

The MPO Modification also proposes the installation of limited, future distributed facilities to fulfill the need for future support facilities that are typically associated with mining operations to meet safety, environmental, operational, closure, and post-closure requirements. The distributed facilities are anticipated south of the drainage divide that defines the southern limit of the proposed Stockpile extension (see Figure 1). Surface disturbance would be limited to a cumulative total of 150 acres of BLM-managed lands. Distributed facilities may include, but are not limited to, upgraded or additional electrical power lines, raw or process water lines, access roads, monitoring wells, communications equipment, stability monitoring equipment, or other support facilities. The environmental review provided by this NEPA analysis will enhance the ability to plan, design, and adjust the alignment of such features to protect natural resources; final engineering plans will be submitted to the BLM prior to ground-disturbing activities related to individual distributed facilities. The distributed facilities would be anticipated for use over 40 years, with the potential for continued use to support reclamation, closure, and post-closure of the mine.

APS has approval for a ROW to relocate the Bagdad 115-kV power line south of the proposed Stockpile extension. This approval permits construction and disturbance within the 100-foot ROW corridor.



However, the approved ROW does not permit construction or improvement of roads outside the 100-foot ROW for power line construction and maintenance. In February 2013, APS submitted a proposed amendment to the existing ROW to construct and improve roads necessary for the future maintenance of the power line (see Figure 1). Approximately 30 acres of disturbance are proposed to BLM-managed lands for the APS roads, spanning a cumulative total of approximately 5 miles. The APS proposed roads are located within the same geographic area as the limited, future distributed facilities described above and would be granted for a 30-year term, with the potential for extension.

1.5 Document Organization

This document contains summary descriptions of the following:

- scoping meetings, including public notices and advertising for the meetings;
- opportunities for public comment during the scoping period;
- the scoping content analysis process, including how individual letters and comments were coded and recorded;
- summary of comments received during the scoping period (October 6, 2014–November 19, 2014), organized by resource or comment theme; and
- summary of scoping comment issues.

2.0 SCOPING PROCESS

Scoping is an early and open process for determining the issues to be addressed in the NEPA process and identifying the issues related to a proposed action. Information collected during scoping is also used to develop alternatives to the proposed action that are analyzed in the NEPA process. The process contains both internal and external scoping. Internal scoping is conducted within an agency to determine preliminary issues and concerns. External scoping provides an opportunity for members of the public to learn about the proposed action and to share any concerns or comments they may have. Input from the scoping process is used to help the BLM identify issues and concerns to be considered in the NEPA process, as well as to identify potential alternatives. In addition, the scoping process helps identify any issues that are not considered relevant and can therefore be eliminated from detailed analysis in the NEPA process. The list of stakeholders and other interested parties is also updated and generally expanded during the scoping process.

The BLM conducted internal scoping for the proposed action in August and September 2014. BLM resource staff reviewed the proposed action and identified preliminary issues and concerns and determined preliminary data necessary for completion of the NEPA analysis.

The public scoping process was initiated by publication of a Legal Notice in several newspapers (see Section 2.2) and mailing a scoping notice (see Appendix A) to the initial mailing list on October 6, 2014. The BLM initially planned for a 30-day period for submitting scoping comments scheduled to end on November 4, 2014. Based upon requests from the public, the scoping period was extended to a 45-day period and ended on November 19, 2014. Although the official scoping period ended on November 19, 2014, the BLM will continue to accept comments throughout the NEPA process.



2.1 Objectives

Scoping is the first step and an integral part of the NEPA process. It is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action (40 CFR 1501.7). The objectives of the scoping process are to:

- increase public awareness and understanding of public lands stewardship through meaningful and productive constituent and local stakeholder involvement in the development of the NEPA document;
- engage federal, state, local, and tribal governments and the public in the early identification of concerns, potential impacts, and possible alternative actions;
- determine the scope and the significant issues to be analyzed in depth in the NEPA document;
- identify potentially significant issues related to the proposed action;
- identify and eliminate issues that are not significant or that have been covered by prior environmental review;
- identify the scope of issues to be addressed and integrate analyses required by other environmental laws (e.g., Endangered Species Act, National Historic Preservation Act); and
- identify technical studies needed to adequately address the potential impacts of the proposed project.

2.2 Advertising of Public Meetings

Pursuant to NEPA requirements, the scoping meetings were advertised in a variety of formats, beginning at least 2 weeks prior to their scheduled dates (Table 1). In each format, the advertisements provided logistics, explained the purpose of the public meetings, gave the schedule for the public comment (scoping) period, outlined additional ways to comment, and provided methods for obtaining additional information (Appendix B).

Table 1. Meeting Notification Methods and Dates

Publicity Item	Venue and Date
Scoping notice (see Appendix A)	BLM mailing list — October 6, 2014
Legal advertisement (see Appendix B)	<i>Kingman Daily Miner</i> — October 6, 2014 <i>Prescott Daily Courier</i> — October 6, 2014 <i>Prescott Valley Tribune</i> — October 8, 2014 <i>Wickenburg Sun</i> — October 8, 2014
Postcard mailing (see Appendix B)	BLM mailing list and Wikieup post office boxes — November 4, 2014
Flyers (see Appendix B)	Bagdad, Kirkland, and Skull Valley post offices Wikieup: Trading Post information board and post office
News release (see Appendix B)	BLM Kingman Field Office — October 7 and November 5, 2014
Email (announcing extension; see Appendix B)	BLM email list (those with only email available)
BLM website	http://bit.ly/bagdadMPO



2.3 Public Scoping Meetings

The BLM hosted five public meetings in October and November 2014, as shown in Table 2. A total of 74 people signed in at the meetings. At the meetings, the project leaders provided brief summaries about the NEPA process and the proposed project and took verbal comments and questions from meeting attendees. The open-house format was designed to allow attendees to view informational displays, ask specialists about the proposed Bagdad Mine Stockpile Extension Project and the NEPA process, and submit written comments on-site. Members of the public were provided with comment forms, fact sheets, and visual displays to learn about the proposed project details. Participants were also encouraged to join the mailing list. Copies of the meeting materials and display boards are provided in Appendix C. The visual displays provided information about the following:

- Welcome, meeting orientation
- Project location overview map
- Proposed MPO modification map
- Proposed MPO modification description
- APS Proposed Right-of-Way Amendment map and description
- Water Resources description
- Biological Resources description
- Cultural and Tribal Resources description
- Additional resource analysis description
- NEPA Process description

Table 2. Public Scoping Meeting Dates, Locations, and Attendance

Meeting Location	Meeting Date	Time of Meeting	Number of People Who Signed In
Peach Springs, AZ	October 22, 2014	4:00 p.m. – 7:00 p.m.	10
Wikieup, AZ	October 23, 2014	5:00 p.m. – 7:30 p.m.	16
Bagdad, AZ	October 28, 2014	5:00 p.m. – 7:30 p.m.	11
Prescott, AZ	October 29, 2014	5:00 p.m. – 7:30 p.m.	13
Wikieup, AZ	November 12, 2014	5:00 p.m. – 7:30 p.m.	24

2.4 Opportunities for Public Comment

Members of the public were afforded several methods for providing comments during the scoping period:

- Comments could be recorded on comment forms at the scoping meetings. Comment forms (see Appendix C) were provided to all meeting attendees and were also available throughout the meeting room, where attendees could write and submit comments during the meeting.
- Emailed comments could be sent to a dedicated email address:
blm_az_kfo_bagdad_mine@blm.gov
- Individual letters and comment forms could be mailed via U.S. Postal Service to Bureau of Land Management, Kingman Field Office, 2755 Mission Boulevard, Kingman, AZ 86401.

All comments were given equal consideration, regardless of method of transmittal.



2.5 Collaborative Planning

The term ‘collaboration’ may be used to describe a wide range of external and internal working relationships. The collaborative process essentially allows the community to communicate to the BLM how public lands should be managed from the public’s perspective. The final goal of the process should be that communities and agencies work together toward a common understanding on the future management of the public lands.

Agency coordination is an important step in a successful collaborative process for several reasons. First, early involvement with other federal, tribal, state, and local governments establishes a solid working relationship with each agency. Next, it also builds trust and credibility among agencies that can then be transferred to the public. Finally, it helps to ensure that the BLM develops land use decisions that are supported by other interested agencies.

Active involvement by the public early in the process helps to ensure consideration of alternatives that address the diversity of public interests, build trust between the BLM and the public, and create public understanding and acceptance of the eventual decision.

Agency Coordination

Early and frequent coordination with affected agencies is emphasized in the Council on Environmental Quality regulations. The BLM is also required by law and regulation to consult with specific agencies and entities because of jurisdictional responsibilities.

Although no specific agency scoping meetings have been held, the BLM has contacted many federal, state, county, and local agencies, as well as American Indian tribes, to initiate coordination throughout the NEPA process. Table 3 lists the agencies that BLM has contacted as of the date of this report.

Table 3. Agencies Contacted to Initiate Coordination

Federal	U.S. Army Corps of Engineers
	U.S. Bureau of Indian Affairs, Western Regional Office
	U.S. Environmental Protection Agency – Region 9
	U.S. Fish and Wildlife Service, Arizona Ecological Services
	U.S. Geological Survey, Arizona Water Science Center
State	Arizona Commerce Authority
	Arizona Corporation Commission
	Arizona Department of Environmental Quality
	Arizona Department of Transportation
	Arizona Department of Water Resources
	Arizona Game and Fish Department
	Arizona Geological Survey
	Arizona Office of Tourism
	Arizona State Historic Preservation Officer
	Arizona State Land Department



Table 3. Agencies Contacted to Initiate Coordination, Continued

State, Continued	Arizona State Mine Inspector
	State of Arizona, Governor's Office
Local	City of Kingman
	City of Prescott
	Town of Wickenburg
	Mohave County
	Yavapai County
	Western Arizona Council of Governments

Tribal Consultation

The BLM is currently consulting with Tribes on a government-to-government level regarding the proposed Bagdad Mine stockpile extension and the APS ROW amendment. The consultation regarding the APS ROW amendment was formally initiated via letters in May 2013 and regarding the Bagdad stockpile extension via letters in January 2014. Tribal consultation will be on-going throughout the process and a summary of this tribal consultation process will be included in the NEPA documentation. Four tribes are being consulted regarding the project: the Fort Mojave Indian Tribe, the Hopi Tribe, the Hualapai Tribe, and the Yavapai-Prescott Indian Tribe. The Hopi Tribe, the Hualapai Tribe, and the Yavapai-Prescott Indian Tribe have indicated they wish to continue consultation; however, the Hopi Tribe and Yavapai-Prescott Indian Tribe have indicated that they will defer to the Hualapai in the consultation process.

3.0 SCOPING CONTENT ANALYSIS

There are four steps to the process used to analyze comments received during public scoping for the NEPA process: 1) developing an issue coding structure, 2) importing into and organizing all comments into a database, 3) carefully reading each submittal and assigning codes to relevant comments, and 4) preparing a narrative report of the results of the analysis. It is important to note that the comment analysis process is not and should not be considered a vote. Every effort was made to qualify the context and intensity of the public's expressions, and all comments were treated evenly and were not weighted by number, organizational affiliation, "status" of the commenter, or other factors. Emphasis was on the content of a comment, rather than on who wrote it or the number of submitters who agreed with it.

3.1 Development of the Coding Structure

Initially, a coding structure was developed to help sort comments into logical categories and subcategories by issue, specifically resources and planning processes applicable to the project area. The issue coding structure was derived from an analysis of the range of issues covered in similar relevant planning documents and evolved as submittals were read and relevant comments identified. The use of these codes allows for quick access to comments on specific topics. Table 4 shows the issue categories that were determined to be most inclusive of the substantive comments received during public scoping.



Table 4. Resource Issue Identification

Resource Issue	Resource Category
Access	ACCE
Air Quality	AIRQ
Biology Resources	BIOL
Cultural Resources	CULT
Socioeconomics	ECON
Health and Safety	HESA
Land Use	LAND
Livestock Grazing	GRAZ
NEPA	NEPA
Reclamation	RECL
Tribal Resources	TRIB
Water Resources	WATE

3.2 Database Analysis

The second phase of the analysis process involved creating a comment database. The commenter information and comment text were entered into the database manually. Each submittal was recorded in the database, where it was assigned a unique number and was then labeled with a commenter type code that indicated the entity from which it was received (i.e., ‘I’ for individual; ‘G’ for government agency; ‘O’ for organization; or ‘B’ for business). Comments that included only a person’s name and any address information were coded as having been received from an individual. If an affiliation with a business, government (federal, state, or local), or organization was included in the commenter information of a comment, the comment record was assigned to the corresponding commenter type category. The comment mode of delivery is also identified (e.g., public meeting comment form).

3.3 Identification and Coding of Comments

Once submittal records were coded for commenter and submittal types, each submittal was read carefully to identify preliminary issues that will be addressed during the preparation of the NEPA document. Each individual statement identified as a relevant comment was assigned a resource category (see Table 4). Each comment was then further described using a specific descriptive resource code (numeric), as illustrated in Table 5. Each submittal may include multiple coded comments. This form of analysis allows for specific comments to be captured and then grouped under the umbrella of a general resource issue. It also allows for cross-referencing and comparison.

Table 5. Resource Code Identification

Resource Issue	Category	Resource Code	Description
Access	ACCE	01	General Access
AIRQ	AIRQ	01	Dust
Biological Resources	BIOL	01	Special Status Species
	BIOL	02	Wildlife
	BIOL	03	Riparian Habitat
	BIOL	04	General Biology



Table 5. Resource Code Identification, Continued

Resource Issue	Category	Resource Code	Description
Cultural Resources	CULT	01	Cultural Resources
Socioeconomics	ECON	01	General Economics
	ECON	02	Livestock/ranching industry
Health and Safety	HESA	01	General Health and Safety
Land Use	LAND	01	General Land Use
Livestock Grazing	GRAZ	01	General Grazing
NEPA	NEPA	01	Agency Consultation
	NEPA	02	Public Involvement
	NEPA	03	EA / EIS
	NEPA	04	Proposed Action
	NEPA	02	Purpose and Need
Reclamation	RECL	01	General Reclamation
Tribal Resources	TRIB	01	Tribal Consultation
Water Resources	WATE	01	Quantity/Usage
	WATE	02	Water Quality
	WATE	03	Groundwater
	WATE	04	General Water Resources

3.4 Preparation of Scoping Report

The final phase included identifying statements of public concern and preparing this narrative report. The statements of concern are a compilation of comments received from the public and various agencies during public scoping. The intent of this compilation is to provide representative statements that capture, with minimal repetition, all major concerns expressed during the public comment period. The statements are not necessarily verbatim iterations of comments received but in many cases include similar or exact phrasing.

4.0 SUMMARY OF PUBLIC SCOPING COMMENTS

4.1 Submittals Received

In total, 29 submittals were collected during public scoping, none of which were identified as duplicate submittals. Table 6 illustrates the types of submittals received and their corresponding comment totals and percentages.

Table 6. Distribution of Comments by Submittal Type

Submittal Type	Submittal Total	Comment Total	Percent of Total (Comments)
Email	23	90	81%
Comment Form	3	15	14%
Letter	3	6	5%
Total	29	111	100%



Table 7 lists the number of submittals and comments by submitter type (individual, government, organization, business). It also lists the agencies, organizations, and tribes that submitted comments.

Table 7. Agencies and Organizations that Submitted Scoping Comments

Submitter Type	Name	Submittal Count	Comment Count
Individual	See Appendix D	19	70
Government	U.S. Fish and Wildlife Service; Arizona Game and Fish Department; Mohave County (2 submittals); Yavapai County	5	19
Organization	Sierra Club; Arizona Mining Association; Concerned Citizens of Wikieup; Western Watersheds Project	4	10
Business	Freeport-McMoRan Bagdad Inc.	1	12
Total		29	111

4.2 Comments Identified

In total, 111 comments were identified in the submittals received during public scoping (see Appendix D). Table 8 shows the distribution of individual comments received by resource category and resource code.

Table 8. Distribution of Public Scoping Comments by Resource Category

Resource Issue	Category	Resource Code	Description	Comment Count
Access	ACCE	01	General Access	2
Air Quality	AIRQ	01	Dust	2
Biological Resources	BIOL	01	Special Status Species	17
	BIOL	02	Wildlife	5
	BIOL	03	Riparian Habitat	2
	BIOL	04	General Biology	1
Cultural Resources	CULT	01	Cultural Resources	2
Socioeconomics	ECON	01	General Socioeconomics	7
	ECON	02	Livestock/Ranching Industry	3
Health and Safety	HESA	01	General Health and Safety	4
Land Use	LAND	01	General Land Use	6
Livestock Grazing	GRAZ	01	General Grazing	1
NEPA	NEPA	01	Agency Consultation	5
	NEPA	02	Public Involvement	9
	NEPA	03	EA / EIS	10
	NEPA	04	Proposed Action	5
	NEPA	02	Purpose and Need	1
Reclamation	RECL	01	General Reclamation	1



Table 8. Distribution of Public Scoping Comments by Resource Category, Continued

Resource Issue	Category	Resource Code	Description	Comment Count
Tribal Resources	TRIB	01	Tribal Consultation	1
Water Resources	WATE	01	Quantity/Usage	18
	WATE	02	Water Quality	6
	WATE	03	Groundwater	2
	WATE	04	General Water Resources	1
Total				111

4.3 Theme Summary

Individual comments were assigned to one of 12 resource issue categories (see Table 8) on the basis of the overall theme of the comment. Some comments were coded into more than one category if the comment included multiple resource issues. Below is a summary of the comment themes and primary issues.

Access

Comments coded ACCE-01 (GENERAL ACCESS) presented concern about continued access to private lands and public lands on existing roads in the vicinity of the proposed action.

Air Quality

Comments coded AIRQ-01 (DUST) addressed concerns about dust and its impact on horses, cattle, and private landowners. They also include a description of fugitive dust emission regulations regarding the Bagdad Mine air quality permit and the requirement to prevent excessive amounts of particulate matter from becoming airborne.

Biological Resources

Comments coded BIOL-01 (SPECIAL STATUS SPECIES) included concerns about impacts to various special status species within the proposed project area. Specific concerns about the area's proposed listed Sonoran desert tortoise (*Gopherus morafkai*) population included general impacts to habitat and potential perching location on the area power line for the common raven (*Corvus corax*), major predator of hatchling and juvenile desert tortoise. Comments requested that current U.S. Fish and Wildlife Service Mohave Desert Tortoise survey protocols be adhered to and conducted by qualified biologists, and that, prior to any proposed project start-up, the area be surveyed for 100% clearance to clear the site of any Sonoran desert tortoise. Comments also requested that Sonoran desert tortoise exclusion fencing be constructed around the proposed project area prior to the 100% clearance survey and any ground-disturbing activity. Comments noted that recent and past (1995) field reconnaissance and habitat evaluation have not identified Sonoran desert tortoise or tortoise sign in the project area or current Stockpile area.

Specific concerns about the potential effects from the proposed project to the endangered Arizona cliffrose (*Purshia subintegra*) were presented, stating that the proposed action appears to occur within or in close proximity to the range and habitat for this plant. Comments requested a habitat assessment and surveys for the plant in appropriate soils.



Comments requested that effects from water drawdown for the mine expansion be carefully considered and analyzed in regard to impacts to listed, proposed, migratory, and sensitive species and their associated habitats in the Bill Williams Watershed system of surface, subsurface, and groundwater basin resources. Specific species mentioned in comments include the southwestern willow flycatcher (*Empidonax traillii extimus*), and critical habitat; yellow-billed cuckoo (*Coccyzus americanus occidentalis*) and critical habitat; Northern Mexican gartersnake (*Thamnophis eques megalops*) and critical habitat; Yuma clapper rail (*Rallus longirostris yumanensis*), razorback sucker (*Xyrauchen texanus*), bonytail chub (*Gila elegans*), proposed listed Sonoran desert tortoise (*Gopherus morafkai*), lowland leopard frog (*Rana yavapaiensis*), and other amphibians and reptiles that need free-flowing and ponded water to survive. In addition, zone-tailed hawk (*Buteo albonotatus*) and black hawk (*Buteogallus anthracinus*) in the area of Burro Creek and the Bill Williams Watershed were requested for analysis. It was requested that analyses include habitat structure, diversity, and density of all vegetative strata as well as impacts to species' prey base.

Comments requested an evaluation of impact to bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*). In particular, commenters requested an analysis of the potential for the new power line to provide roosting, perching, nesting, or foraging structure for migratory or resident raptors (hawks, falcons, eagles, and owls) and the potential for electrocution.

Comments included a sensitive species list developed using Arizona Game and Fish Department's (AGFD's) Online Environmental Review Tool that contained Heritage Data Management System and Arizona's Species of Greatest Conservation Need species having potential to be in the vicinity of the proposed stockpile. It was requested that the area be surveyed for these species to verify occupancy prior to ground disturbance.

Comments coded **BIOL-02 (WILDLIFE)** include concerns about wildlife and wildlife habitat in and around the proposed project area. Specific concerns included impacts to Gila monster (*Heloderma suspectum*) and requested a biological survey and impact/mitigation study be conducted for the species. Comments also included concerns about how the proposed projects could affect the bighorn sheep (*Ovis canadensis nelsoni*) that have been reintroduced into the Hell's Half Acre Mountains by the AGFD. Comments include concerns about how water quality of free-standing water and water impoundments in the project area would impact wildlife and the potential for trapping wildlife species. Commenters requested that the document include analysis of water drainage and analysis of potential drainage of polluted waters to Burro Creek and the potential associated impacts to wildlife in the area.

Comments coded **BIOL-03 (RIPARIAN)** contain concerns about continued water removal from the Big Sandy Basin and Big Sandy River and the impact this has on riparian habitat.

Comments coded **BIOL-04 (GENERAL BIOLOGY)** contain the concern that the project area landscape may include important flora and fauna.

Cultural Resources

Comments coded **CULT-01 (CULTURAL RESOURCES)** express concern about the historical importance of the area to the Yavapai and Hualapai people and the importance of carefully surveying the area for cultural resources. Comments noted that some cultural resource studies have been conducted in the area and that a few cultural sites have been recommended as eligible for listing on the National Register of Historic Places and any additional studies and sites identified will go through a similar process.



Socioeconomics

Comments coded **ECON-01 (GENERAL SOCIOECONOMICS)** express concern about the importance of the approval of this proposed project and the Bagdad Mine to the economy of Yavapai County and the State of Arizona. Comments noted that in 2013, the Arizona mining industry employed approximately 12,100 people and had an estimated direct and indirect impact on the Arizona economy of nearly \$5 billion. Other commenters expressed concerns about giving away public land to a corporation without tangible benefits to the public, as there are no new jobs and no new revenues associated with the proposed project. Commenters requested that the NEPA analysis include review of the mine's current and projected/proposed water use and the associated socioeconomic impacts associated with well drawdown in the Wikieup area.

Comments coded **ECON-02 (LIVESTOCK/RANCHING INDUSTRY)** contain concerns about the economic impacts on ranching permittees of removal of those permits in the area of the proposed project. Commenters also expressed concerns about how declining water in the Wikieup area would impact economics of the area's livestock industry, ranching, and farming.

Health and Safety

Comments coded **HESA-01 (GENERAL HEALTH AND SAFETY)** expressed concern about fire and safety issues in the Wikieup area related to water drawdown in the Big Sandy area. These comments requested that FMBI help the area establish a new fire station and fire truck to increase safety in the area. Comments also expressed that the proposed project would increase safety by removing fire-prone vegetation and covering old mine sites.

Land Use

Comments coded **LAND-01 (GENERAL LAND USE)** expressed concerns about the use of public lands for the proposed action and desired that the land be left undisturbed. Other commenters expressed that the landscape is of marginal value and the best use of this public land is for the proposed project to be built in this location. Comments noted: 1) that FMBI holds legal interest in the proposed project area through the ownership of patented and unpatented claims that give the right to conduct mining operations on public lands, 2) the BLM's authority to disapprove the proposed project is limited because of the General Mining Law of 1872, and 3) the Kingman Resource Management Plan (RMP) provides management guidance to minimize environmental damage from mineral development and the proposed project is consistent with these guidelines.

Livestock Grazing

Comments coded **GRAZ-01 (GENERAL GRAZING)** included concerns about the quantity of grazing permits in the area and requested that livestock grazing retirement be included in project mitigation. The comment requested that any expansion of mining infrastructure affecting public land be offset through the relinquishment and retirement of grazing leases and permits held by FMBI and its subsidiary corporations on adjacent and nearby public lands.

NEPA

Comments coded **NEPA-01 (AGENCY CONSULTATION)** recommended the following agencies be consulted in the NEPA process: Mohave County, AGFD, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, and U.S. Army Corps of Engineers.



Comments coded **NEPA-02 (PUBLIC INVOLVEMENT)** expressed concerns that the scoping comment period and scoping meetings were not adequately advertised and, because of that, an additional meeting in Wikieup was necessary, along with an extension of the scoping comment period to 60 days. Commenters requested better communication, a mass mailer, and noted that there is no newspaper delivery in Wikieup. A commenter also requested to be involved in mitigation measure development for sensitive resources.

Comments coded **NEPA-03 (EA / EIS)** included comments urging that the BLM conduct an EIS-level analysis to evaluate the project impacts because of potential impacts to desert tortoise, Burro Creek from heavy metal leakage, and water drawdown in the Big Sandy Basin. Other commenters urged that the BLM conduct an EA to analyze the project impacts because there appears to be no significant impact to the environment and timely approvals are necessary. Other comment rationale presented for doing an EA include:

- As recently as 2012, BLM approved the extension of Stockpile placement activities immediately adjacent to the Stockpile under consideration in the current proposal. That extension was approved with a determination of NEPA adequacy based on the 1996 EIS for FMBI's MPO. The environmental setting for the Stockpile extension is adjacent to and nearly identical to that approved only 2 years ago, and thus, it is reasonable to conclude that the same conditions exist that allowed a similar approval in the recent past.
- In the MPO Modification, FMBI proposes no changes in mining operation methods, mining rates, or water usage and recommits to its high standard of environmental stewardship.
- BLM, finding no significant impacts, issued a ROW in 2009 for APS construction of the power line using an EA, and the APS proposed action is simply allowing safe and reliable, long-term access for maintenance of their facilities in the existing ROW.
- BLM's internal scoping did not identify any potentially significant effects, and public comments received to date have not changed this.
- BLM did not expect that the MPO Modification or ROW Amendment had a potential for regional or national controversy, and comments received to date have not changed this.
- The proposed action is not one which would "normally require preparation of an EIS," as listed in the BLM's NEPA Handbook (BLM 2008).

Comments coded **NEPA-04 (PROPOSED ACTION)** contained concerns about the non-specific language (i.e., "may include, but not limited to"; "other support facilities") used in describing the proposed action and requested that the proposed action description be changed to be very clear about what is proposed. Comments requested that the proposed action and analysis include the expansion of the mine pit and operation because this directly correlated to the extension of the stockpile and leach fields; they should be analyzed as one total and complete project and not be piecemealed; and a thorough analysis should be conducted and the public made aware of the entire proposed project scope, purpose, and focus.

Comments recommended that it be made clear that the BLM is considering two proposed actions: 1) the MPO Modification, and 2) the ROW Amendment. The document should include two separate and independent no action alternatives, sets of alternatives, and separate and independent records of decision. Comments stated that there is no "connected" relationship between the MPO Modification and the ROW Amendment; the only relationship is that they have similar timing and geography. Also, comments noted that the Bagdad Mine operation is an existing project and not connected to this proposed action.

Comments coded **NEPA-05 (PURPOSE AND NEED)** suggested that the purpose and need follow the BLM Handbook (BLM 2008) that states it should "briefly specify the underlying purpose and need to



which the agency is responding.” Suggested edits to the purpose and need included in comments included the following:

For the proposed MPO Modification, BLM’s purpose is to authorize FMBI’s proposed surface disturbances necessary to (1) provide an extension of the existing, consolidated Plan IX Leach and South Waste Rock stockpiles (the Stockpile) using efficient and effective methods and equipment, and (2) identify constraints to planning and future construction of distributed facilities needed for mining operations.

The need for this action is established by the policies and mandates set out in the Kingman Resource Management Plan (RMP), the Federal Land Policy and Management Act of 1976, and the General Mining Law of 1872. As such, the BLM needs to respond to a request to modify an existing mine plan of operations, submitted by FMBI pursuant to 43 CFR 3809 for additional surface disturbances to public lands administered by the BLM.

For the proposed ROW Amendment, BLM’s purpose is to authorize the surface disturbances necessary to afford APS safe, reliable, and cost-effective access adequate to support long-term maintenance to their existing power line right of way.

The need for this action is established by the policies and mandates set out in the Kingman RMP and the Federal Land Policy and Management Act of 1976. As such, the BLM needs to respond to a request to amend an existing right of way, submitted by APS pursuant to 43 CFR 2800 et seq., for additional surface disturbances to public lands administered by the BLM.

Reclamation

Comments coded **RECL-01 (GENERAL RECLAMATION)** asked what was planned with regard to regenerating the lands while conducting mining operations.

Tribal Resources

Comments coded **TRIB-01 (TRIBAL CONSULTATION)** asked the BLM to invite affected Tribes and the Bureau of Indian Affairs to participate in the planning process. Tribes included in the comment list include the Hopi Tribe, Hualapai Tribe, Colorado River Indian Tribes, and the Yavapai Apache Nation.

Water Resources

Comments coded **WATE-01 (QUANTITY / USAGE)** expressed concerns about continued removal of water from the Big Sandy Basin for ongoing Bagdad Mine operations and requested that these impacts be analyzed and mitigated in the NEPA process. Specific concerns included drawdown of residential wells and reduction of drinking-water quality and availability, transfer of water rights, legal issues, and climate change. Commenters questioned how extension of the stockpile would not be directly related to allowing for continued mining operation and expansion for an additional 25 or 40 years and questioned if leaching operations would expand with the expanded stockpile. A mitigation proposed from the comments included requesting FMBI develop a fund to assist residents of the Wikieup region with well drawdown problems. Comments also noted that the proposed action does not change the amount of water demand needed for the stockpile extension or the operation of the Bagdad Mine and the FMBI holds water rights issued by the Arizona Department of Water Resources for water use.

Comments coded **WATE-02 (QUALITY)** expressed concerns about impacts from contaminated water at the proposed action site and how that would degrade surface and groundwater in the proposed project site



and in the region. Specifically, comments included concerns about on site, free-standing water and water impoundments, and heavy-metal contamination into the Burro Creek hydrological system. Comments also requested that water quality analysis and monitoring be initiated south and west of the stockpile in the direction of the Santa Maria Basin. Comments noted that the stockpile extension is designed to direct all surface water drainage toward the open pit and that there is no relationship between surface water at the Stockpile and Burro Creek.

Comments coded **WATE-03 (GROUNDWATER)** questioned how chemical contamination associated with the proposed action would impact the area's groundwater. Comments noted that the direction of groundwater flow from the proposed action area is toward the cone of depression, or hydraulic sink, created by the open pit.

Comments coded **WATE-04 (GENERAL)** requested that a comprehensive hydrological evaluation of the effects of the proposed action on the watershed be conducted.

4.4 Summary of Informal Comments from Notes Taken During the Public Scoping Meetings

In addition to formally submitted comments, informal comments and input were received from members of the public during the question and answer sessions and general discussions at the scoping meetings. These comments and questions were noted and are summarized below in Table 9.

Table 9. Informal Comments and Questions from Scoping Meetings

<p>October 22, 2014 – Peach Springs, Arizona</p> <ul style="list-style-type: none"> • What is the purpose of Areas of Environmental Concern (ACECs) in the vicinity of this area? • Are there existing cultural sites in the area? • This action should go to the Tribal Council for approval. • The water has been moved and is gone. • When did you meet with the Tribal Council? • Are there graves in the area? This could be a burial ground area. The graves and burial sites are a big concern. • What about future access – will the roads be open? • Where is the water coming from? • There is a lack of communication between the Tribal Council and the people of the reservation. • This could affect the plants – tribal gathering of plants is important. • This could affect the human life. Cancer is a concern. • This is greed-based – are you prepared for the illness that will follow? • The water has dried up in the Big Sandy – where did the water go?
<p>October 23, 2014 – Wikieup, Arizona</p> <ul style="list-style-type: none"> • The noticing for this meeting was insufficient. What will you do about that? • Why can't you place the rock back into the pit? • If you are expanding the waste rock pile how does that not change future water needs? • Who does the APS line benefit? Can other people use the APS power from the power line? • How many power poles are you putting in? • How will this impact the Burro Creek Wilderness? • How will this impact the Big Sandy Basin? • The Burro Creek ACEC supports the black hawk and southwest willow flycatcher. How will this project impact the Burro Creek ACEC?



Table 9. Informal Comments and Questions from Scoping Meetings, Continued

<ul style="list-style-type: none"> • What about impacts to the yellow-billed cuckoo? • The Santa Maria is dewatered and habitat is decreasing and the southwest willow flycatcher is decreasing – how does this project impact the Santa Maria? • Attracting ravens by trash and power line perches may negatively impact the desert tortoise – ravens prey on juvenile desert tortoise. • Wikieup is experiencing well drawdown. • How will the use of water for the mine extension be evaluated in terms of impact to endangered species? • Please assess the water quality currently and the anticipated runoff water quality post-runoff in the Big Sandy and Burro Creek. • When were the groundwater and surface water standards set? What is the testing interval and how are the tests calibrated? • Bagdad should publish water demand and water usage for public review. • Bagdad should put in test wells to illustrate the drawdown in the Wikieup area when there is an increase in water use. • Where is the Mohave County Supervisor? Were they notified? • Everyone in Wikieup needs to be notified about this project. You need to have another scoping meeting and extend the scoping period.
<p>October 28, 2014 – Bagdad, Arizona</p> <ul style="list-style-type: none"> • What is the future access plan for the area? Will there be continued access to private lands and public recreation lands? • What exactly is planned for the distributed facilities area? The description of this is too general and needs to be more specific. How are we supposed to evaluate this part of the proposal if we do not know what the plans are? • Is there a plan to control dust in the area?
<p>October 29, 2014 – Prescott, Arizona</p> <ul style="list-style-type: none"> • Are processing and mine operations going to increase as a result of the proposal? • Has groundwater ever been negatively affected by leaching? • Are you going to do reclamation as an ongoing activity? Why leave it to the end? • Is there a stipulation that reclamation needs to occur in a specific time frame? • Can you backfill the pit with the waste rock? • Can you sell the waste rock? • Will the local rancher get more land from the BLM for grazing since this is taking over their grazing lands? • Are there cultural resources in the area? How will they be impacted? • What are the environmental impacts of this proposal? • Why are you not telling us about the impacts of this proposed project?
<p>November 12, 2014 – Wikieup, Arizona</p> <ul style="list-style-type: none"> • Where are the water-quality monitoring wells located? • What is the expected life of the mine? Does this proposed action change the life of the mine? • Why do you need this stockpile extension on public land? Why not put it on private land and save the public land for the public? • Where does the water used for mine processing go? Does it end up in the area's groundwater? • Please explain why the water used in mine processing will not change based upon this proposed action. • Is it feasible to put the water back into the aquifer? • What is the tax implication for putting the stockpile on BLM land versus private land? • What is the visual impact of the stockpile? • Are you doing surveys for mammals and reptiles?



5.0 RESOURCE ISSUES IDENTIFIED

5.1 BLM Internal Scoping; Resource Issue Summary

The BLM conducted internal scoping with resource staff and determined the following preliminary issues and data needs.

Air Quality

- How will air quality (emission levels particulate matter 10 [PM₁₀], Clean Air Act compliance) be impacted by the stockpile extension?
- What are the required best management practices (BMPs) for reducing impacts to air quality?

Cultural Resources

- How will the National Register of Historic Places eligible site within the footprint of the stockpile be affected?
- How will the proposed action affect the area of interest to the Hualapai Tribe in the vicinity of Mountain Spring?
- What will the effect on cultural resources be within the area described as the Distributed Facilities area?

Public Access and Recreation

- What will the effect of the stockpile extension be on off-highway vehicle routes used by recreationists?
- How will the stockpile extension affect dispersed recreation opportunities (e.g., hunting, camping, hiking, wildlife viewing) in the vicinity of the proposed stockpile?
- How will changes in surface water flow affect erosion of existing access routes?

Rangeland and Grazing

- What will the effects be on grazing permits in the area?
- How will the stockpile affect waters used by livestock?

Visual Resources

- How will BLM assess changes to the visual characteristics of the area?
- How do the RMP Visual Resource Management objectives affect the proposed action or alternatives?

Springs/Wetlands/Riparian Areas

- How will the proposed action and alternatives affect water flow at Mountain Spring?
- Is there wetland vegetation present at Mountain Spring? If so, will it be retained? If not retained, what would the effects be on the riparian/wetland vegetation?



- Will wildlife access to Mountain Spring surface water be retained? If not, what would the effects be on wildlife with no or limited access to the surface water at the spring?
- Will water be retained at spring sites? If not, what would the effect be on riparian/wetland vegetation?
- Is there wetland vegetation at spring sites? If so, will it be retained? If not, what would the effect be on riparian/wetland vegetation?
- Will wildlife access to spring water be retained? If not, what would the effect be on wildlife with no or limited access to surface water at springs?
- Will there be effects on riparian/wetland vegetation and wildlife dependent on it (including amphibians, birds, and bats)?
- What would the effects of a breach into Burro Creek be on riparian obligate and facultative species that use Burro Creek as habitat?

Bats/Wildlife

- Will the proposed action or alternatives affect old mine features or caves that could harbor bat roosts?
- Will old mine features, especially adits and shafts, or caves, be affected by the proposed action or alternatives? How many would be affected, and what would the impacts be?
- What would the effects be on roosting bats from the proposed action and alternatives?
- How would water quality of free-standing water and water impoundments affect bats?
- How would distributed facilities and roads proposed in the proposed action and alternatives fragment wildlife habitat? What would the effects be on big game, mesofauna, pronghorn, bighorn sheep, desert tortoise, bats, migratory birds, and other wildlife?
- How would the proposed action and alternatives affect big-game use and movement through the proposed waste rock area and distributed facilities area? How are these areas connected to adjacent lands, i.e., is there development surrounding the lands proposed to be disturbed? Are these lands essentially undeveloped? What would the cumulative impacts of disturbance of an additional 640 acres of grassland and 18 acres of Arizona upland habitats be on wildlife and big-game use and movement through these areas?
- How much wildlife habitat (in acres) will be lost or degraded due to surface disturbance, vegetation removal, and increased human activity from the proposed action and alternatives? What are the impacts from this loss?
- How would the water quality of free-standing water and water impoundments affect wildlife, including bats, under the proposed action and alternatives?
- What would the effects on aquatic species (i.e., fish, amphibians, macroinvertebrates) be from a breach of contaminants into Burro Creek?

Special Status Species

- How would sensitive and special status species (including “proposed” and “candidate” threatened and endangered species) be affected by the proposed action and alternatives, including, but not limited to, gilded flickers (if Sonoran desert vegetation), Townsend’s big-eared bat (*Corynorhinus townsendii*), cave myotis (*Myotis velifer*), greater western mastiff bat (*Eumops*



perotis californicus), Aquarius milkvetch (*Astragalus newberryi* var. *aquaria*) (if any limestone outcrops), California flannelbush (*Fremontodendron californica*) (in shady canyons), Kearny sumac (*Rhus kearneyii* ssp. *kearneyii*) (in shady canyons), and Parish wild onion (*Allium parishii*)?

- What Sonoran desert tortoise habitat would be affected by the proposed action and alternatives? Would there be long-term effects (greater than 10 years) on tortoise or tortoise habitat?
- What impacts would there be to migratory birds from the proposed action and alternatives?
- How would the water quality of free-standing water and water impoundments affect migratory birds, including raptors, in the area?
- Are any BLM sensitive, state, or federal listed species present? Would they be adversely affected by the proposed action and alternatives?
- How will facilities, especially power lines, affect raptors? Would mitigation include raptor-proof power lines?
- What would the impact be to other species of wildlife from providing new perch and nesting sites to raptors under the proposed action and alternatives?

Vegetation and Invasive Species

- What would the effects be on vegetation from the proposed action and alternatives?
- What would the effects be of 150 acres of surface-disturbing activities (distributed facilities, proposed action) on vegetation?
- How would the loss of vegetation and ecological function (hydrology, habitat integrity, wildlife use, livestock use) of over 640 acres of grassland habitat and 18 acres of Arizona Upland habitat affect the above resources?
- Are there plants covered by the Arizona Native Plant Law within the project area? How will they be treated? What would the impacts be to succulents that occur within the footprint of the proposed action and alternatives? Plants listed for salvage in the Arizona Native Plant Law include cacti, yucca, nolina, agave, and ocotillo. How would plant salvage be accomplished?
- How would vegetation removal for facilities and roads affect soil erosion over the footprint of the waste rock extension and distributed facilities areas?
- How would soils be affected by vegetation removal and alteration of water flow patterns resulting from the proposed action and alternatives (including waste rock extension; facilities and road development; use and maintenance of roads and facilities over the entire footprint of the waste rock extension and distributed facilities area)?
- Are any BLM sensitive, state, or federal listed plant species present? Would they be adversely affected by the proposed action or alternatives?
- How would surface disturbance affect invasion of invasive plants?

Noise

- How would noise from the proposed action and alternatives affect wildlife and wildlife movement?
- How would noise from the proposed action and alternatives affect adjacent property owners and residents?



Water Resources

- Will the actions affect the quantity of water needed?
- How will the project affect groundwater quality, including fate, transport, tailings seepage, and capture of pregnant heap leach solution?
- Might the project result in surface water runoff into Burro Creek and the Santa Maria basin, and would it affect the proposed Wild and Scenic River segment and associated recreation opportunities?
- What are the water quality standards and status of Burro Creek and Boulder Creek (total maximum daily load)?
- What are the water quality standards and status for the area's groundwater (maximum contaminant levels for metals)?
- What would the impact be of mine contaminants breaching into Burro Creek and the Burro Creek Wilderness via the Butte Creek watershed? Is it likely that mine contaminants would drain into Burro Creek via Butte Creek? How uncertain is such an event?
- How often is a breach likely to happen, and how can it be mitigated?
- How controversial would the breach of contaminants into Burro Creek be?

Mine Reclamation

- What are the impacts associated with mine reclamation activities?
- What is the expected time frame for reclamation? How would this affect wildlife habitat reclamation?

Cumulative Impacts

- What are the plans for mine expansion onto private lands and State lands? How are private and State lands expected to be developed by mining connected to the existing disturbed mining areas and to the areas within all alternatives?
- How many acres of private and State land would be affected by a mining footprint?
- How many cumulative acres are expected to be permanently disturbed by waste rock dumping, distributed facilities, and road development for mining purposes on public, private, and State lands?
- How many cumulative acres of wildlife habitat are expected to be fragmented by waste rock dumping, distributed facilities, and road development for mining purposes on public, private, and State lands? What would the cumulative impacts from habitat fragmentation to wildlife be in a state and regional context?
- What would the cumulative impact of mine expansion and development onto private lands and State lands be to wildlife, soils, special status species, pronghorn, bighorn sheep, other big game, migratory birds, riparian habitats, surface and subsurface water, vegetation, bats, aquatic species, riparian obligate and facultative species, raptors, cultural resources, visual resources, recreational resources, and livestock grazing resources?
- In a state context, what are the cumulative impacts to wildlife movement and wildlife use of public, private, and State lands expected from development of the lands for mining under all alternatives?



- In a landscape/regional context, what would the cumulative effects be on wildlife movement and use on public, private, and State lands located adjacent to areas expected to be developed for mining?
- What would the cumulative impact to wildlife, soils, special status species, pronghorn, bighorn sheep, other big game, migratory birds, riparian habitats, surface and subsurface water, vegetation, bats, aquatic species, riparian obligate and facultative species, raptors, cultural resources, visual resources, recreational resources, and livestock grazing resources be from the continuation and expansion of mining activities?
- What would the cumulative impact of mine expansion and development onto private lands be to historical mine features, cultural resources, and traditional cultural properties?
- What would the cumulative impacts be from the cumulative development of one of the alternatives along with expansion of mining activities onto State and private lands to the Upper Burro Creek Wilderness?
- What would the cumulative impacts from the cumulative development of one of the alternatives along with expansion of mining activities onto State and private lands be to the aquatic and riparian habitats of Burro Creek?
- What would the cumulative impacts from the development of one of the alternatives along with expansion of mining activities onto State and private lands be to wildlife, including aquatic, riparian obligate and facultative wildlife species, and migratory birds that use the riparian and aquatic habitats of Burro Creek?
- What would the cumulative impacts be of increased water withdrawal from the expansion of mining activities onto State and private lands?

5.2 Public Scoping; Resource Issue Summary

Access

- How would the proposed action affect future access to private and recreational lands in the project area vicinity?

Air Quality

- How would the proposed action impact air quality, specifically dust emissions, in the project area vicinity, and how are these emissions regulated?

Biological Resources

- How would the proposed action and alternatives affect the Sonoran desert tortoise and the Arizona cliffrose?
- How will the area be surveyed for special status species, including the Sonoran desert tortoise?
- How would the proposed action and alternatives affect the Heritage Data Management System and Arizona's Species of Greatest Conservation Need species list generated from the AGFD Online Environmental Review Tool?
- How would the proposed action and alternatives affect the southwestern willow flycatcher and critical habitat; yellow-billed cuckoo and critical habitat; northern Mexican gartersnake and critical habitat; Yuma clapper rail, razorback sucker, bonytail chub, proposed listed Sonoran



desert tortoise, lowland leopard frog, and other amphibians and reptiles in the Bill Williams watershed, including impacts to riparian habitat?

- How would the proposed action and alternatives affect the zone-tailed hawk and black hawk in the area of Burro Creek and the Bill Williams watershed?
- How would the proposed action and alternatives affect the bald eagle and golden eagle?
- How would the proposed action and alternatives affect wildlife in the project area and vicinity, including the Gila monster and bighorn sheep reintroduced into the region?
- How would potential contaminated drainage from the project area affect wildlife in Burro Creek?
- How would potential contaminated water in the project area affect the area's wildlife?

Cultural Resources

- How would the proposed action and alternatives affect the area's cultural resources, and how will the area be surveyed for identifying cultural resources?

Socioeconomics

- What are the economic impacts of the proposed action to the area, regional, and state economies?
- What are the socioeconomic impacts (beneficial and negative) to the BLM and the local and regional vicinity?
- How would the proposed action impact the economics of grazing leases in the project area?
- How would water usage associated with the proposed action impact socioeconomics, including the ranching industry, in the Wikieup area?

Health and Safety

- How would the proposed action affect health and safety in the Wikieup area related to fire and safety issues and ongoing water removal for mine operations from the Big Sandy area?
- How would the proposed action affect safety in the vicinity of the proposed action through the removal of fire-prone vegetation and abandoned mine sites?

Land Use

- How would the proposed action impact future land use in the project area?
- How does existing land use, including patented and unpatented mining claims in the project area, affect the NEPA process?

Livestock Grazing

- How would the proposed action affect grazing leases in the project area?
- Could retirement of grazing leases roughly equivalent to the area of disturbance be considered as project mitigation?

NEPA

- How will the BLM consult with government agencies in the NEPA process, including Mohave County, AGFD, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, and U.S. Army Corps of Engineers?



- How will the BLM improve public notification of the NEPA process to better communicate meetings and milestones?
- How will the proposed action description be revised to include suggested edits proposed in public scoping, including adding more specificity and details regarding proposed projects in the Distributed Facilities area?
- How will the proposed action and the NEPA analysis include expansion of the mine pit and operations?
- How will the BLM revise the purpose and need to include suggested edits in the public scoping comments?
- How will the BLM decide between an EA and an EIS, and at what point during the analysis would that decision be made?

Reclamation

- How will the NEPA document address impacts of mine reclamation, specifically occurring concurrently with mine development?

Tribal Resources

- How will Tribes and the Bureau of Indian Affairs be consulted in the NEPA process, including the Hopi Tribe, Hualapai Tribe, Colorado River Indian Tribes, and the Yavapai-Apache Nation?

Water Resources

- How would the NEPA document address water usage at the Bagdad Mine and how it relates to removing water from the Big Sandy area and Wikieup? What would the effects of the proposed action and Bagdad Mine operations be, as related to water usage, on water availability in the Wikieup area?
- What would the effect of the proposed action and alternatives be on surface-water and groundwater quality in the project area and area watershed? Specifically, what would the impact be on Burro Creek and the Santa Maria Basin?

6.0 FUTURE STEPS IN THE NEPA PROCESS

The BLM will use the comments collected during scoping to define issues and to develop alternatives to the proposed action to address those issues. The impacts that could result from implementing the alternatives will be analyzed and documented in a draft NEPA document.

The issues presented above will be reviewed to determine how they will be analyzed in the NEPA document. Issues will be put through a disposition process and placed into one of the following issue disposition categories (Table 10).

Table 10. Issue Disposition

Disposition	Explanation
Process	Identifies certain elements of the NEPA process that must be documented and disclosed, but does not require specific resource analysis in the NEPA document.
Purpose and Need	Requires additional documentation or clarification of the project purpose and need.



Table 10. Issue Disposition, Continued

Disposition	Explanation
Alternatives Development	Requires refinement of proposed action or analysis of existing alternatives or consideration of new alternatives.
Impacts Analysis	Requires analysis of impacts to specific resources of concern.
Out of Scope	Identifies comments that are not within the scope of the BLM's decision regarding the project, or are otherwise not substantive and not addressed in the NEPA process.

The draft NEPA document will be made available for public review and is currently scheduled for publication in summer 2015. The availability of the draft document will be announced through the mailing list and advertised in the local and regional media. Public comments will be accepted for 30 days, during which public meetings will be held to receive comments on the adequacy of the draft document. The BLM will review and consider all comments received, and the document will be modified as appropriate based on public comments. All substantive comments and responses will be incorporated into the final NEPA document.



7.0 LITERATURE CITED

Bureau of Land Management (BLM). 2008. *BLM National Environmental Policy Act Handbook*. U.S. Department of Interior.

FMBI (Freeport-McMoRan Bagdad Inc.) 1996. Plan of Operations for Upper Mammoth Tailings & South Waste Rock Disposal Facilities (Revision No. 5). February.

———. 2014. Bagdad Mine Stockpile Extension Modification to the Mine Plan of Operations. May.



APPENDIX A
Scoping Notice



October 6, 2014

Subject: Proposed Bagdad Mine Stockpile Extension Project Scoping Notice

Dear Interested Party:

A proposal has been submitted to the Bureau of Land Management (BLM) Kingman Field Office by Freeport-McMoRan Bagdad Inc. (FMBI) to modify their Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona. The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the installation of limited, future distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to maintain a 115-kilovolt power line within the same geographic area of the MPO modification. The MPO modification and ROW amendment propose new surface disturbance to approximately 600 acres of public land managed by the BLM and approximately 90 acres of private land.

This scoping notice is to inform the public that the BLM Kingman Field Office is analyzing these proposals in compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act of 1976, as amended. This is the first step in the scoping process under NEPA, which requires federal agencies to consider the potential physical, biological, social, and economic effects of their actions on the environment. These proposals will be analyzed under either a NEPA Environmental Assessment (EA) or Environmental Impact Statement (EIS), depending upon the significance of issues identified during the scoping process. This scoping period is being structured so, if BLM chooses to do an EIS, comments received during this scoping period will be sufficient to satisfy the requirements of an EIS and no further scoping would be required.

Description of Proposed Projects

FMBI owns and operates the copper mining operation at the Bagdad Mine, located approximately 100 miles northwest of Phoenix, in western Yavapai County, Arizona. Mining has occurred in the Bagdad area since the early 1880s, and open pit mining began in 1945. The majority of the existing Bagdad Mine operations and facilities are situated on private lands. However, some Bagdad Mine operations are conducted on BLM lands under an existing 1996 MPO (as amended), *Plan of Operations for Upper Mammoth Tailings & South Waste Rock Disposal Facilities*. Approximately 671 acres of BLM-managed lands in Sections 8 and 9 of Township 14 North, Range 9 West have been previously approved for disturbance through the approval of the 1996 MPO and subsequent amendments (see attached map - BLM approved disturbance area).

The BLM accepted the *Bagdad Mine Stockpile Extension Modification to the Mine Plan of Operations* (MPO Modification) as administratively complete in June of 2014. The MPO Modification seeks to modify the 1996 MPO (as amended) for the extension of the existing consolidated Plan IX Leach/South Waste Rock Stockpile (the Stockpile) located in Sections 16 and 17 of Township 14 North, Range 9 West (see attached map). The proposed extension includes increasing the existing Stockpile by approximately 450 acres onto BLM-managed lands and would allow for the construction, operation, closure, and post-closure of the proposed Stockpile extension. The operation of the expanded Stockpile would continue in the same manner as the existing Stockpile. The stockpile extension would be both lateral and vertical. The conceptual design plan for the stockpile illustrates a height of approximately 1,200 feet, extending to approximately 4,850 feet above mean sea level. Overburden and mineralized waste rock materials from the open pit will continue to be placed on the Stockpile by haul trucks. Leaching would occur on the western, Plan IX Leach portion of the Stockpile, and overburden/mineralized waste rock would be stored

on the eastern, South Waste Rock portion of the Stockpile. The southern boundary of the proposed stockpile extension generally corresponds to a drainage divide (ridgeline); stockpiled materials would not be placed south of this divide. Storm water runoff from the stockpile extension would continue to be directed to the existing open pit to the north. The proposed Stockpile extension has an anticipated operational life of approximately 40 years.

The MPO modification also proposes the installation of limited, future distributed facilities to fulfill the need for future support facilities that are typically associated with mining operations to meet safety, environmental, operational, closure and post-closure requirements. The distributed facilities are anticipated south of the drainage divide that defines the southern limit of the proposed Stockpile extension (Figure 1). Surface disturbance would be limited to a cumulative total of 150 acres of BLM-managed lands. Distributed facilities may include, but are not limited to, upgraded or additional electrical power lines, raw or process water lines, access roads, monitoring wells, communications equipment, stability monitoring equipment, or other support facilities. The environmental review provided by this NEPA analysis will enhance the ability to plan, design, and adjust the alignment of such features to protect natural resources; final engineering plans will be submitted to the BLM prior to ground-disturbing activities related to individual distributed facilities. The distributed facilities would be anticipated for use over 40 years, with the potential for continued use to support reclamation, closure, and post-closure of the mine.

APS has approval for a ROW to relocate the Bagdad 115 kV power line south of the proposed Stockpile extension. This approval permits construction and disturbance within the 100-foot ROW corridor. However, the approved ROW does not permit construction or improvement of roads outside the 100-foot ROW for power line construction and maintenance. In February 2013, APS submitted a proposed amendment to the existing ROW to construct and improve roads necessary for the future maintenance of the power line (Figure 1). Approximately 30 acres of disturbance are proposed to BLM-managed lands for the APS roads, spanning a cumulative total of approximately 5 miles. The APS proposed roads are located within the same geographic area as the limited, future distributed facilities described above and would be granted for a 30-year term, with the potential for extension.

Preliminary Issues and Concerns

The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including alternatives, and guide the process for complying with NEPA. The BLM has identified the following preliminary issues.

- Potential loss of both historic and prehistoric cultural resources
- Degradation of visual resources
- Loss of wildlife habitat
- Loss of forage for livestock grazing
- Closure of existing vehicle routes used for recreation and public access
- Potential effects to water resources.

Public Involvement

Open houses to present the proposed project, answer questions, and accept public comments will be held in the following locations and times. The meetings are “open house” style and will include a short presentation at the dates and times listed below.

- **October 22, 2014, 4:00 p.m. to 7:00 p.m., presentation at 5:00 p.m.** Hualapai Cultural Center, Peach Springs, Arizona
- **October 23, 2014, 5:00 p.m. to 7:30 p.m. presentation at 6:00 p.m.** Owens Elementary School, 14109 East Chicken Springs Rd, Wikieup, Arizona
- **October 28, 2014, 5:00 p.m. to 7:30 p.m. presentation at 6:00 p.m.** Bagdad Community Campus, 700 Palo Verde, Bagdad, Arizona
- **October 29, 2014, 5:00 p.m. to 7:30 p.m., presentation at 6:00 p.m.** Prescott Adult Center, 1280 East Rosser Street, Prescott, Arizona

Public Comments

We are inviting your comments on this proposal. Public input is important in establishing the level and scope of the analysis. The public is encouraged to participate throughout the NEPA process to help in identifying the level of analysis needed, alternatives to the proposed action, other issues or concerns that should be analyzed or mitigated, and any other comments or ideas to help ensure the completeness of the analysis process.

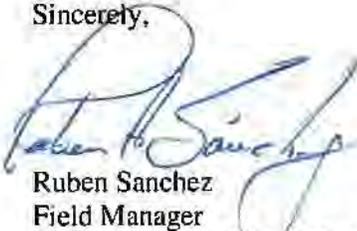
We can best use your comments if they are received no later than the end of the 30-day scoping period, November 4, 2014. A comment form has been enclosed for your convenience. Please mail your written comments to Bagdad Mine MPO Modification, 2755 Mission Boulevard, Kingman, AZ 86401, or fax to 928-718-3761. Electronic comments may be submitted to blm_az_kfo_bagdad_mine@blm.gov.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record and will be available for public inspection.

For project information and updates, please visit the project website at <http://bit.ly/bagdadMPO>. If you have questions regarding this proposal, do not hesitate to contact Mr. Walter (Buzz) Todd, III, Project Manager, at (928) 718-3717 or by email at wtodd@blm.gov.

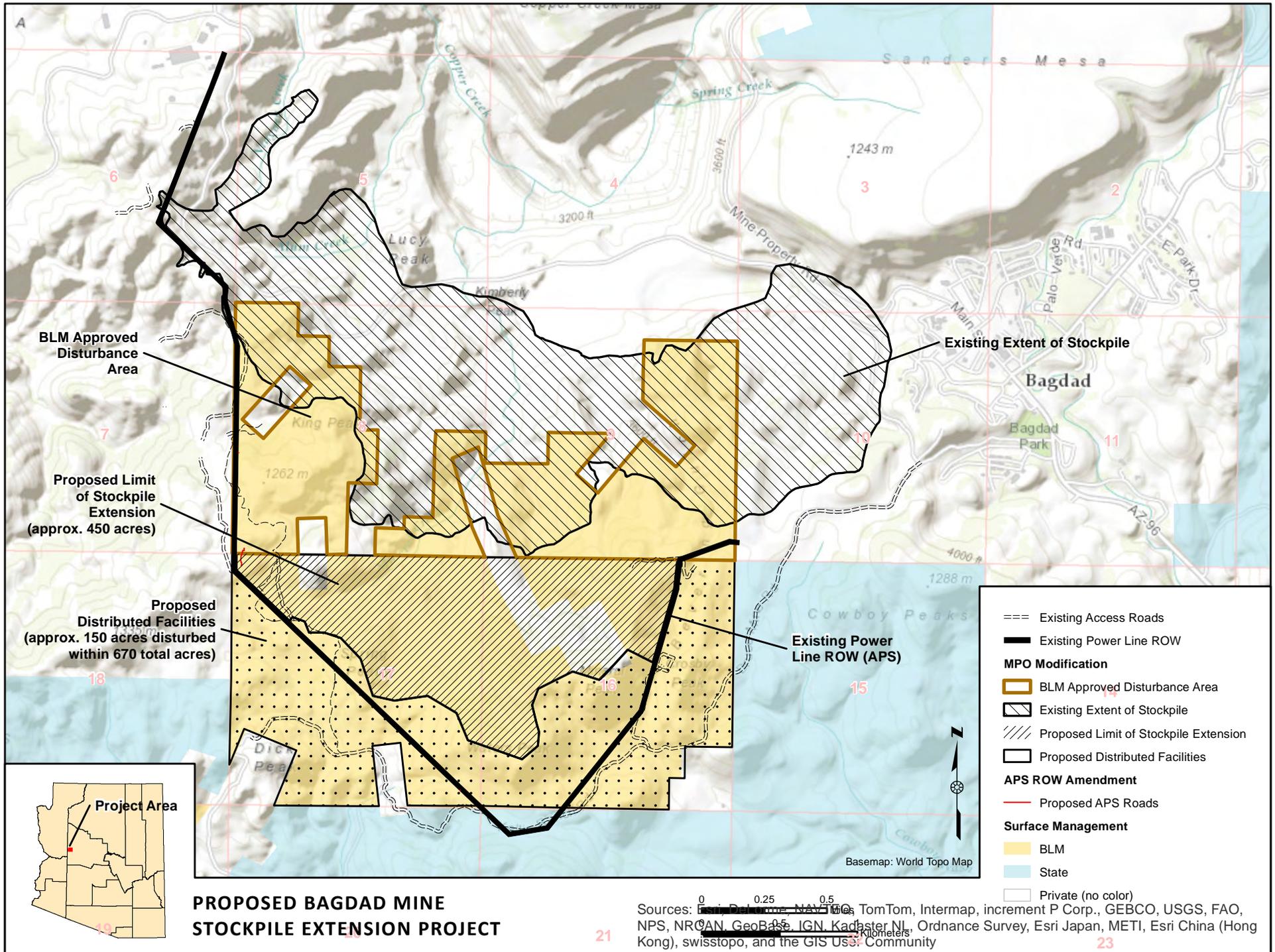
We look forward to receiving your comments and thank you for your participation in the NEPA process for this project.

Sincerely,



Ruben Sanchez
Field Manager
BLM Kingman Field Office

Enclosures



PROPOSED BAGDAD MINE STOCKPILE EXTENSION PROJECT

First
Class
Stamp
Here

Bagdad Mine MPO Modification
2755 Mission Boulevard
Kingman, AZ 86401

Fold Here

APPENDIX B

Scoping Meeting Advertisements (legal notice, press release, flyers)

LEGAL NOTICE
BUREAU OF LAND MANAGEMENT
KINGMAN FIELD OFFICE

The Bureau of Land Management (BLM) Kingman Field Office is holding public scoping meetings to receive comments on the proposed Bagdad Mine Stockpile Extension Project. Freeport-McMoRan Bagdad Inc. has proposed to modify their Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona. The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the installation of limited, future distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to construct and maintain a 115-kilovolt power line in the vicinity of the MPO modification area. The MPO modification and ROW amendment propose new surface disturbance to approximately 600 acres of public land managed by the BLM and approximately 90 acres of private land.

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For further information regarding this proposal please contact the BLM project manager, Mr. Walter (Buzz) Todd, III, at (928) 718-3717 or by email at wttod@blm.gov.

Published in *The Wickenburg Sun* on October 8, 2014.

BUREAU OF LAND MANAGEMENT
KINGMAN FIELD OFFICE
LEGAL NOTICE
BAGDAD MINE STOCKPILE EXTENSION PROJECT

STATE OF ARIZONA

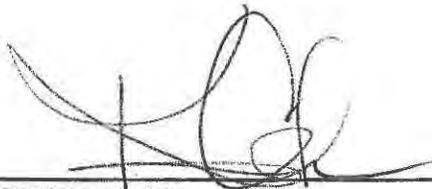
County of Maricopa

Kevin Cloe, being duly sworn, upon oath, deposes and says:
That he is the Publisher of

The Wickenburg Sun

A newspaper of general circulation in the County of Maricopa State of Arizona, published in Wickenburg, Arizona, and that the copy hereto attached is a true copy of the advertisement as published weekly in The Wickenburg Sun on the Dates following:

October 8, 2014

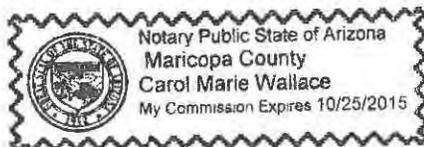


KEVIN CLOE
PUBLISHER

Subscribed and sworn to before me this 8th day of October, 2014.



Notary Public My commission expires 10/25/2015



AFFIDAVIT OF PUBLICATION

Kingman Daily Miner

3015 Stockton Hill Road, Kingman, AZ 86401

web: www.kingmandailyminer.com • e-mail: legals@kingmandailyminer.com

Phone (928) 753-6397, ext. 242 • Fax (928) 753-5661

"Serving Kingman since 1882"

STATE OF ARIZONA)
County of Mohave) ss.

I, **Ashley Abella**, being first duly sworn on her oath says:
That she is the Legals Clerk of THE KINGMAN DAILY MINER
An Arizona corporation, which owns and publishes the Miner,
a Daily Newspaper published in the City of Kingman, County of Mohave,
Arizona, that the notice attached hereto, namely,

385756

Legal Notice

Has, to the personal knowledge of affiant, **6th day of Oct., 2014**
to the **6th day of Oct., 2014** inclusive without change, interruption or
omission, amounting in 1 insertions made of the following dates:
10/6/2014.

By: *Ashley Abella*
Legal Clerk, **15th day of Dec., 2014**

State of Arizona

County of Mohave

On this 15 day of December, 2014

Legal Clerk, whom I know personally to be
the person who signed the above document
and she proved she signed it.

Nirali H. Dave
Notary Public
My Commission Expires May 24, 2018



385756
LEGAL NOTICE
Bureau of Land Management
Kingman Field Office
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Comments may also be submitted in writing to Bagdad Mine MPO Modification, 2755 Mission Boulevard, Kingman, AZ 86401, or fax to 928-718-3761. Electronic comments may be submitted to bim_az_kfo_bagdad_mine@blm.gov. We can best use your comments if they are received no later than the end of the 30-day scoping period, November 4, 2014. For project information and updates, please visit the project website at <http://bit.ly/bagdadMPO>. For further information regarding this proposal please contact the BLM project manager, Mr. Walter (Buzz) Todd, III, at (928) 718-3717 or by email at wtodd@blm.gov.

Published: 10/6/2014 Ad No.385756

AFFIDAVIT OF PUBLICATION

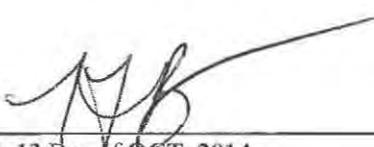
STATE OF ARIZONA)
County of Yavapai) ss.

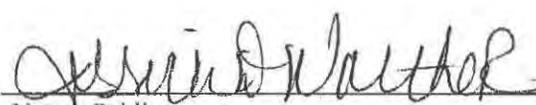
I, Teri Bryant, being first duly sworn on her oath, say:
That she is the Legals Clerk of PRESCOTT NEWSPAPERS, INC., an Arizona corporation, which owns and publishes **THE DAILY COURIER**, a Daily Newspaper published in the City of Prescott, County of Yavapai that the notice attached hereto, namely,

**BUREAU OF LAND MANAGEMENT
LEGAL NOTICE
KINGMAN FIELD OFFICE**

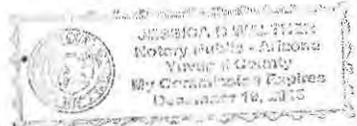
has, to the personal knowledge of affidavit, been published in the news paper aforesaid, according to law, on 6 day of OCT, 2014 to 8 day of OCT, 2014 both inclusive without change, interruption or omission, amounting in all 2 insertions, made on the following dates:

- OCT 6, 2014 DAILY COURIER
- OCT 8, 2014 PRESCOTT VALLEY TRIBUNE

By: 
Dated this 13 Day of OCT, 2014

By: 
Notary Public

My commission expires:



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Kingman Field Office**

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1TC PUB Oct. 6, 2014
1PVT PUB Oct. 8, 2014

From: [Jill Grams](#)
To: [Jill Grams](#)
Subject: Bagdad Mine Stockpile Extension Project and Meetings
Date: Tuesday, October 07, 2014 3:22:01 PM
Attachments: Bagdad Mine Public Mtg 10 14.doc

----- Forwarded message -----

From: **Cook, Lori** <lacook@blm.gov>
Date: Tue, Oct 7, 2014 at 11:48 AM
Subject: Bagdad Mine Stockpile Extension Project and Meetings
To: 3tvnews@azfamily.com, achoate@kdminer.com, aparizona@ap.org, aplasvegas@ap.org, aznews@skyviewsat.com, baukerman@comeast.net, betty.reid@arizonarepublic.com, bill@kppv.com, chartz@prescottaz.com, dengler@verdevalleynews.com, DiWms@npgcable.com, don@myradioplac.com, ed.montini@arizonarepublic.com, editor2@pvvt.com, Becky Maxedon <editor@havasunews.com>, editor@larsonnewspapers.com, editorial@williamsnews.com, ffonseca@ap.org, foxde602@foxtv.com, Gary.Watson@co.mohave.az.us, havasuvideonews.com@gmail.com, hdunn@kpnx.com, hometowncrier@yahoo.com, john_warren@azfamily.com, Kathy Tippet <kathyt@havasuchamber.com>, marvin vosper <kbuxradio@hotmail.com>, kfyinews@clearchannel.com, kjmbfm@hotmail.com, MBeggs@azdot.gov, mcasey@kpnx.com, metroeditors@lasvegassun.com, mvdnews@npgcable.com, news@cameronbroadcasting.com, news@havasunews.com, news@myradioplac.com, news@thestandardnewspaper.net, news@tv2klbc.com, nw.news@arizonarepublic.com, pio@bullheadcity.com, pioneer@havasunews.com, publisher@wickenburgsun.com, Suzanne Adams <sadams@kdminer.com>, sandy@kppv.com, seth.parker@kpho.com, shari.farrington@mail.house.gov, smuller@azdailysun.com, stacy.sullivan@arizonarepublic.com, stanfred23@yahoo.com, "adella@knlb.com" <adella@knlb.com>, "billw7fbo@gmail.com" <billw7fbo@gmail.com>, "bmcmillen@mohavedailynews.com" <bmcmillen@mohavedailynews.com>, Brian Wedemeyer <editor@az-independent.com>, Don sorchych <sonnews@aol.com>, Doug McMurdo <dmcmurdo@kdminer.com>, Emily Kane <ekane@azvma.org>, Jim Allen <jim@azbw.com>, Joanna Dodder <jdodder@prescottaz.com>, Joshua Noble <Joshua@kingmanchamber.org>, "meriwether@frontiernet.com" <meriwether@frontiernet.com>, Michael Wells <michaelwells645@gmail.com>, "newshawk22@hotmail.com" <newshawk22@hotmail.com>, "nick_matiella@mccain.senate.gov" <nick_matiella@mccain.senate.gov>, "publisher@nwppub.com" <publisher@nwppub.com>, "rthurlow@kdminer.com" <rthurlow@kdminer.com>, Thom McGraham <buzzybee3@bullheadcity-bee.com>

For Release: October 7, 2014

Contact: Lori Cook – 928-317-3243 or cell 928-246-8560

**BLM Announces Public Scoping Meetings
for the Bagdad Mine Stockpile Extension Project**

Kingman, Ariz. - The Bureau of Land Management (BLM) is holding public scoping meetings to receive comments on the proposed Bagdad Mine Stockpile Extension Project. A proposal has been submitted to the BLM Kingman Field Office by Freeport-McMoRan Bagdad Inc. to modify their

Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona.

The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the installation of limited, future distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to maintain a 115-kilovolt power line in the vicinity of the MPO modification area. The MPO modification and ROW amendment propose new surface disturbance to approximately 600 acres of public land managed by the BLM and approximately 90 acres of private land.

Public scoping meetings will be held in Peach Springs, Wikieup, Bagdad, and Prescott, Arizona. The meetings are "open house" style and will include a short presentation at the dates and times listed below.

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5:00 p.m. presentation
Hualapai Cultural Center
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Bagdad, Arizona

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Wikieup, Arizona

October 29, 2014, 5:00 p.m. to 7:30 p.m.
6:00 p.m. presentation
Prescott Adult Center
1280 East Rosser Street
Prescott, Arizona

The BLM is actively soliciting public comments on environmental issues, potential impacts, alternatives, and mitigation measures that should be considered in this analysis. Your comments will be most valuable if they are received no later than the end of the 30-day scoping period, November 4, 2014. Please mail your written comments to Bagdad Mine MPO Modification, 2755 Mission Boulevard, Kingman, AZ 86401, or fax to 928-718-3761. Electronic comments may be submitted to <blm_az_kfo_bagdad_mine@blm.gov>.

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--

Lori Cook
Bureau of Land Management
2555 Gila Ridge Road
Yuma, AZ 85365
928-317-3243

From: [Jill Grams](#)
To: [Jill Grams](#)
Subject: FW: Public Comment Period Extension and Public Meeting
Date: Wednesday, November 05, 2014 3:57:22 PM
Attachments: Bagdad Mine Extension 11 14.doc

----- Forwarded message -----

From: **Cook, Lori** <lacook@blm.gov>

Date: Wed, Nov 5, 2014 at 3:36 PM

Subject: Public Comment Period Extension and Public Meeting

To: 3tvnews@azfamily.com, achoate@kdminer.com, aparizona@ap.org, aplasvegas@ap.org, aznews@skyviewsat.com, baukerman@comcast.net, betty.reid@arizonarepublic.com, bill@kppv.com, chartz@prescottaz.com, dengler@verdevalleynews.com, DiWms@npgcable.com, don@myradioplac.com, ed.montini@arizonarepublic.com, editor2@pvvt.com, Becky Maxedon <editor@havasunews.com>, editor@larsonnewspapers.com, editorial@williamsnews.com, ffonseca@ap.org, foxde602@foxtv.com, Gary.Watson@co.mohave.az.us, havasuvideonews.com@gmail.com, hdunn@kpnx.com, hometownner@yahoo.com, john_warren@azfamily.com, Kathy Tippet <kathyt@havasuchamber.com>, marvin vosper <kbuxradio@hotmail.com>, kfyinews@clearchannel.com, kjmbfm@hotmail.com, MBeggs@azdot.gov, mcasey@kpnx.com, metroeditors@lasvegassun.com, mvdnews@npgcable.com, news@cameronbroadcasting.com, news@havasunews.com, news@myradioplac.com, news@thestandardnewspaper.net, news@tv2klbc.com, nw.news@arizonarepublic.com, pio@bullheadcity.com, pioneer@havasunews.com, publisher@wickenburgsun.com, Suzanne Adams <sadams@kdminer.com>, sandy@kppv.com, seth.parker@kpho.com, shari.farrington@mail.house.gov, smuller@azdailysun.com, stacy.sullivan@arizonarepublic.com, stanfred23@yahoo.com, "adella@knlb.com" <adella@knlb.com>, "billw7fbo@gmail.com" <billw7fbo@gmail.com>, "bmcmillen@mohavedailynews.com" <bmcmillen@mohavedailynews.com>, Brian Wedemeyer <editor@az-independent.com>, Don sorchych <sonnews@aol.com>, Doug McMurdo <dmcmurdo@kdminer.com>, Emily Kane <ekane@azvma.org>, Jim Allen <jim@azbw.com>, Joanna Dodder <jdodder@prescottaz.com>, Joshua Noble <Joshua@kingmanchamber.org>, "meriwether@frontiernet.com" <meriwether@frontiernet.com>, Michael Wells <michaelwells645@gmail.com>, "newshawk22@hotmail.com" <newshawk22@hotmail.com>, "nick_matiella@mccain.senate.gov" <nick_matiella@mccain.senate.gov>, "publisher@nwppub.com" <publisher@nwppub.com>, "rthurlow@kdminer.com" <rthurlow@kdminer.com>, Thom McGraham <buzzybee3@bullheadcity-bee.com>

For Release: November 5, 2014

Contact: Lori Cook – 928-317-3243 or cell 928-246-8560

BLM Announces Public Comment Period Extension and Additional Public Meeting for the Bagdad Mine Stockpile Extension Project

Kingman, Ariz. - The Bureau of Land Management (BLM) announced today an extension of the comment period for the public scoping process for the proposed Bagdad Mine Stockpile Extension Project. The BLM Kingman Field Office is preparing a National Environmental Policy Act analysis of proposals from Freeport-McMoRan Bagdad Inc. (FMBI) and Arizona Public Service

(APS). FMBI has submitted a modification to their existing Mine Plan of Operations (MPO) at the Bagdad Mine to extend the existing consolidated leach and waste rock stockpile south of the mine and to consider the installation of future distributed facilities south of the stockpile. APS has submitted a proposed amendment to an existing right-of-way for the construction of access roads to maintain a 115-kilovolt power line within the same geographic area of the MPO modification.

The BLM held four public scoping meetings in October 2014 in Peach Springs, Wikieup, Bagdad, and Prescott, Ariz., to present the proposed actions to the public and receive public comment. Based on requests made at the public scoping meetings, the BLM is extending the scoping period for this project. The scoping period is extended from 30 days to 45 days and will end on November 19, 2014.

The BLM also scheduled an additional public open house scoping meeting. Representatives from the BLM, FMBI, and APS will be available to answer your questions about the proposed project and take your comments at the open house meeting. The meeting will be held at the following location:

Owens Elementary School

14109 East Chicken Springs Rd.

Wikieup, Arizona

Wednesday, November 12, 2014, 5:00 p.m. to 7:30 p.m.

5:30 p.m. presentation

The BLM is actively soliciting public comments on environmental issues, potential impacts, alternatives, and mitigation measures that should be considered in this analysis. Your comments will be most valuable if they are received no later than the end of the 45-day scoping period, November 19, 2014. Please mail your written comments to Bagdad Mine MPO Modification, 2755 Mission Boulevard, Kingman, AZ 86401, or fax to 928-718-3761. Electronic comments may be submitted to <blm_az_kfo_bagdad_mine@blm.gov>.

For project information and updates, please visit the project website at <http://bit.ly/bagdadMPO>. If you have questions regarding this proposal, please contact Mr. Walter (Buzz) Todd, III, Project Manager, at (928) 718-3717 or by email at wtodd@blm.gov.

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Lori Cook
Bureau of Land Management
2555 Gila Ridge Road
Yuma, AZ 85365
928-317-3243



BLM NEWS RELEASE

U.S. Department of the Interior • Bureau of Land Management • Colorado River District • 2610 Sweetwater Ave. • Lake Havasu City, AZ 86406

For Release: November 5, 2014
Contact: Lori Cook – 928-317-3243 or cell 928-246-8560

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The BLM manages more than 245 million acres of public land, the most of any Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The BLM also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's mission is to manage and conserve the public lands for the use and enjoyment of present and future generations under our mandate of multiple-use and sustained yield. In Fiscal Year 2013, the BLM generated \$4.7 billion in receipts from public lands.

###



BLM Announces Extended Scoping Period for Bagdad Mine Stockpile Extension

KFO BAGDAD Mine, BLM AZ <blm_az_kfo_bagdad_mine@blm.gov> Tue, Nov 4, 2014 at 4:04 PM
To: "Hubbs, Dawn" <dawn.hubbs101@gmail.com>, hualapaiwoman@yahoo.com, raf.reyna@gmail.com,
jdodder@prescottaz.com, silvernichelco@aol.com, goldenandrebecca@aim.com, lawrence.dandurand@me.com,
bevelation@hotmail.com, francesstomas@earthlink.com, carolynnbryan@hotmail.com

The BLM, Kingman Field Office, is announcing that they are extending the public comment period for the Bagdad Mine Stockpile Extension an additional 2 weeks. The public comment period will now conclude on November 19, 2014. In addition, they have agreed to hold another public meeting in Wickieup, Arizona, on November 12, 2014. For more information, please see the attached post card, or go to the Project Web Site at <http://bit.ly/bagdadMPO>.

2014-10-31_Wikieup-Postcard-4x6_front.pdf
525K



BLM Announces Extended Scoping Period for Bagdad Mine Stockpile Extension

KFO BAGDAD Mine, BLM AZ <blm_az_kfo_bagdad_mine@blm.gov> Tue, Nov 4, 2014 at 4:04 PM
To: "Hubbs, Dawn" <dawn.hubbs101@gmail.com>, hualapaiwoman@yahoo.com, raf.reyna@gmail.com,
jdodder@prescottaz.com, silvernichelco@aol.com, goldenandrebecca@aim.com, lawrence.dandurand@me.com,
bevelation@hotmail.com, francesstomas@earthlink.com, carolynnbryan@hotmail.com

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 2014-10-31_Wikieup-Postcard-4x6_front.pdf
525K

Proposed Bagdad Mine Stockpile Extension Project

Scoping Period Extension & Public Meeting Announcement

The Bureau of Land Management (BLM) Kingman Field Office is preparing a National Environmental Policy Act analysis of proposals from Freeport-McMoRan Bagdad Inc.(FMBI) and Arizona Public Service (APS). FMBI has submitted a modification to their existing Mine Plan of Operations (MPO) at the Bagdad Mine to extend the existing consolidated leach and waste rock stockpile south of the mine and to consider the installation of future distributed facilities south of the stockpile. APS has submitted a proposed amendment to an existing right-of-way for the construction of access roads to maintain a 115-kilovolt power line within the same geographic area of the MPO modification.

The BLM held four public scoping meetings in October 2014 in Peach Springs, Wikieup, Bagdad, and Prescott, AZ, to present the proposed actions to the public and receive public comment.

Based on requests made at the public scoping meetings, the BLM is extending the scoping period for this project. The scoping period is extended from 30 days to 45 days and will end on **November 19, 2014**. Please provide your comments on the proposed project by this date. Comments can be sent via mail, fax, or email to: Bagdad Mine MPO Modification, 2755 Mission Boulevard, Kingman, AZ 86401, fax: 928-718-3761, email: blm_az_kfo_bagdad_mine@blm.gov.

The BLM has also scheduled an additional public open house scoping meeting to be held on:

Wednesday, November 12, 2014
Open House: 5:00 p.m. to 7:30 p.m.
Presentation at 5:30 p.m.
Owens Elementary School
14109 East Chicken Springs Rd.
Wikieup, Arizona

Representatives from the BLM, Freeport-McMoRan Bagdad Inc., and Arizona Public Service (APS) and will be available to answer your questions about the proposed project and take your comments at the open house meeting.

To learn more about the proposed project, please visit the project website at <http://bit.ly/bagdadMPO>.

If you have questions,
please contact:
Mr. Walter (Buzz) Todd, III
Bureau of Land Management
(928) 718-3717
wtodd@blm.gov



Bagdad Mine Proposed Stockpile Extension Project

Kingman Field Office

BLM

Public Meeting Announcement

Peach Springs

October 22, 2014

4:00 p.m. to 7:00 p.m.

5:00 p.m. presentation

Hualapai Cultural Center

Peach Springs, Arizona

Wikieup

October 23, 2014

5:00 p.m. to 7:30 p.m.

6:00 p.m. presentation

Owens Elementary School

14109 East Chicken Springs Rd.

Wikieup, Arizona

Bagdad

October 28, 2014

5:00 p.m. to 7:30 p.m.

6:00 p.m. presentation

Bagdad Community Campus

700 Palo Verde

Bagdad, Arizona

Prescott

October 29, 2014

5:00 p.m. to 7:30 p.m.

6:00 p.m. presentation

Prescott Adult Center

1280 E Rosser Street

Prescott, Arizona

The Bureau of Land Management (BLM) Kingman Field Office is holding public scoping meetings to receive comments on the proposed Bagdad Mine Stockpile Extension Project. Freeport-McMoRan Bagdad Inc. has proposed to modify their Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona. The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the installation of limited, future distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to maintain a 115-kilovolt power line within the same geographic area of the MPO modification. The MPO modification and ROW amendment propose new surface disturbance to approximately 600 acres of public land managed by the BLM and approximately 90 acres of private land.

Please plan to attend one of the following open house meetings to learn more about the proposed project and provide comments.

Comments may also be submitted in writing to Bagdad Mine MPO Modification, 2755 Mission Boulevard, Kingman, AZ 86401, or fax to 928-718-3761. Electronic comments may be submitted to blm_az_kfo_bagdad_mine@blm.gov. We can best use your comments if they are received no later than the end of the 30-day scoping period, November 4, 2014. For project information and updates, please visit the project website at <http://bit.ly/bagdadMPO>.

For further information regarding this proposal please contact the BLM project manager, Mr. Walter (Buzz) Todd, III, at (928) 718-3717 or by email at wtodd@blm.gov.



Bagdad Mine Proposed Stockpile Extension Project

Public Meeting Announcement and Scoping Period Extension

The Bureau of Land Management (BLM) Kingman Field Office is preparing a National Environmental Policy Act (NEPA) analysis of proposals from Freeport-McMoRan Bagdad Inc. (FMBI) and Arizona Public Service (APS). FMBI has proposed modifying their Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona. The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the future installation of limited, distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to maintain a 115-kilovolt power line within the same geographic area of the MPO modification. The MPO modification and ROW amendment propose new surface disturbance to approximately 600 acres of public land managed by the BLM and approximately 90 acres of private land.

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November 12, 2014
Wikieup, Arizona**
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Presentation at 5:30 p.m.
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If you have questions, please contact:
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Bureau of Land Management
(928) 718-3717
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APPENDIX C

Scoping Meeting Materials and Display Boards

Bagdad Mine Proposed Stockpile Extension Project

Scoping Meeting Handout

Welcome to the Bureau of Land Management (BLM) Kingman Field Office public scoping meetings. We are here to receive public comments to help identify potential issues regarding the the proposed Bagdad Mine Stockpile Extension Project.

A proposal has been submitted to the BLM Kingman Field Office by Freeport-McMoRan Bagdad Inc. (FMBI) to modify their Mine Plan of Operations (MPO) at the Bagdad Mine, located in Yavapai County west of the unincorporated community of Bagdad, Arizona. The proposed modification would authorize the extension of an existing, consolidated leach and waste rock stockpile on the south side of the mine. The modification also contemplates the future installation of limited, distributed facilities south of the stockpile. In addition, Arizona Public Service Company (APS) has submitted a proposed amendment to an existing right-of-way (ROW) for the construction of access roads to maintain a 115-kilovolt power line within the same geographic area of the MPO modification. The MPO modification and ROW amendment are described below and on the following page.

FMBI Proposed MPO Modification Description

Stockpile Location

- Freeport-McMoRan Bagdad Inc. (FMBI) submitted a proposal to the BLM Kingman Field Office to modify their current 1996 Mine Plan of Operations (MPO) at the Bagdad Mine.
- Approximately 671 acres of BLM-managed lands are currently approved for disturbance through the 1996 MPO.
- The MPO modification proposes to extend the existing stockpile (consolidated Plan IX Leach/South Waste Rock Stockpile) by approximately 450 acres on BLM-managed lands and private lands.
- This would allow for the construction, operation, closure, and postclosure of the stockpile. The operation of the expanded stockpile would continue in the same manner as the current stockpile.
- Overburden and mineralized waste rock materials from the open pit would continue to be placed on the stockpile by haul trucks. Leaching would occur on the western, Plan IX Leach portion of the stockpile, and overburden/mineralized waste rock would be stored on the eastern, South Waste Rock portion of the stockpile.
- The stockpile extension would be both lateral and vertical. The conceptual design plan for the stockpile illustrates a height of approximately 1,200 feet, extending to approximately 4,850 feet above mean sea level.
- The proposed stockpile extension has an anticipated operational life of approximately 40 years.

Distributed Facilities

- The MPO modification also proposes the installation of future distributed facilities to support mining operations to meet safety, environmental, operational, closure and post-closure requirements. The distributed facilities area is south of the proposed stockpile extension.
- Surface disturbance of the facilities would be limited to a cumulative total of 150 acres within the 670 acre analysis area.
- Facilities may include, but are not limited to, upgraded or additional electrical power lines, raw or process water lines, access roads, monitoring wells, communications equipment, stability monitoring equipment, or other support facilities.
- Through this National Environmental Policy Act (NEPA) analysis, the BLM will identify areas of sensitive resources that would be avoided or mitigated in future facility proposals.
- After this analysis, FMBI would provide plans for future facilities as they are needed. The BLM would conduct a Determination of NEPA Adequacy to determine if the proposed facility meets the conditions established in this document.
- The distributed facilities would be anticipated for use over 40 years, with the potential for continued use to support reclamation, closure, and post-closure of the mine.



APS Proposed Right-of-Way Amendment Description

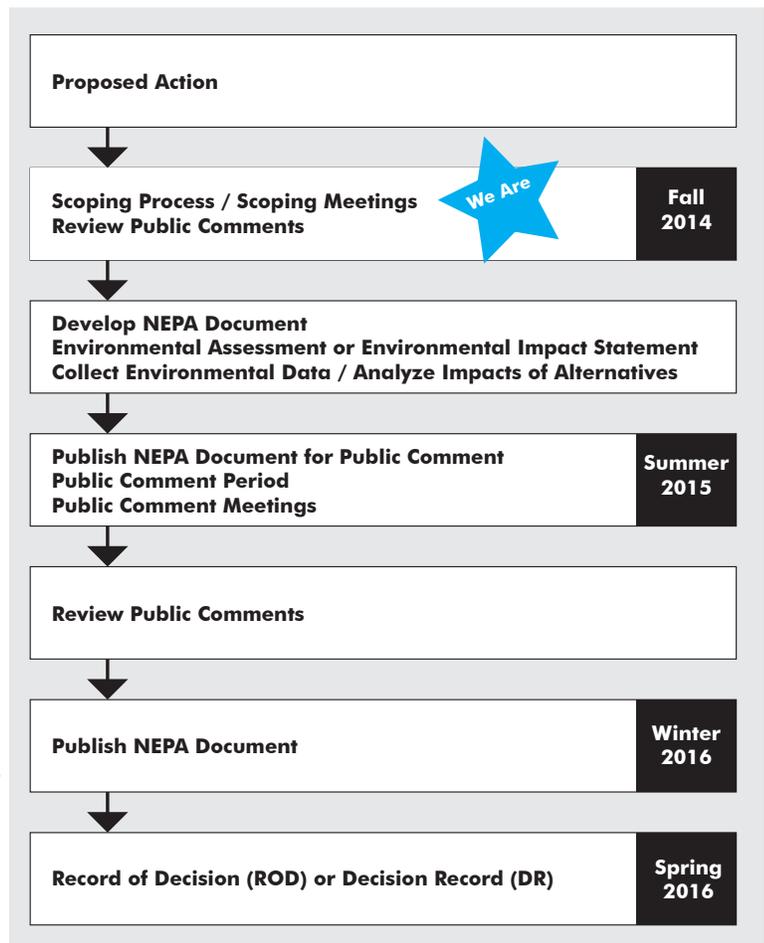
- APS has approval for a right-of-way (ROW) to relocate the Bagdad 115-kV power line south of the proposed stockpile extension.
- This approval permits construction and disturbance within the 100-foot ROW corridor.
- The approved ROW does not permit construction or improvement of roads outside the 100-foot ROW for power line maintenance.
- In February 2013, APS submitted a proposed amendment to the existing ROW to construct and improve roads necessary for future maintenance of the power line.
- Approximately 5 miles of road are proposed on BLM-managed lands, with approximately 30 acres of disturbance.
- The APS proposed roads are located within the same geographic area as the limited, future distributed facilities and would be granted for a 30-year term, with the potential for extension.

BLM's Purpose and Need

BLM's purpose is to provide FMBI a location for their requested stockpile and distributed facilities to assure compliance with BLM's 43 CFR 3809 and 3715 regulations. The purpose is also to analyze and consider whether or not to amend APS's ROW to provide the maintenance access requested to assure compliance with the 43 CFR 2800 regulations. The need is established under FLPMA to respond to a technically complete Mining Plan of Operations and a request for ROW amendment for legal access.

NEPA Process

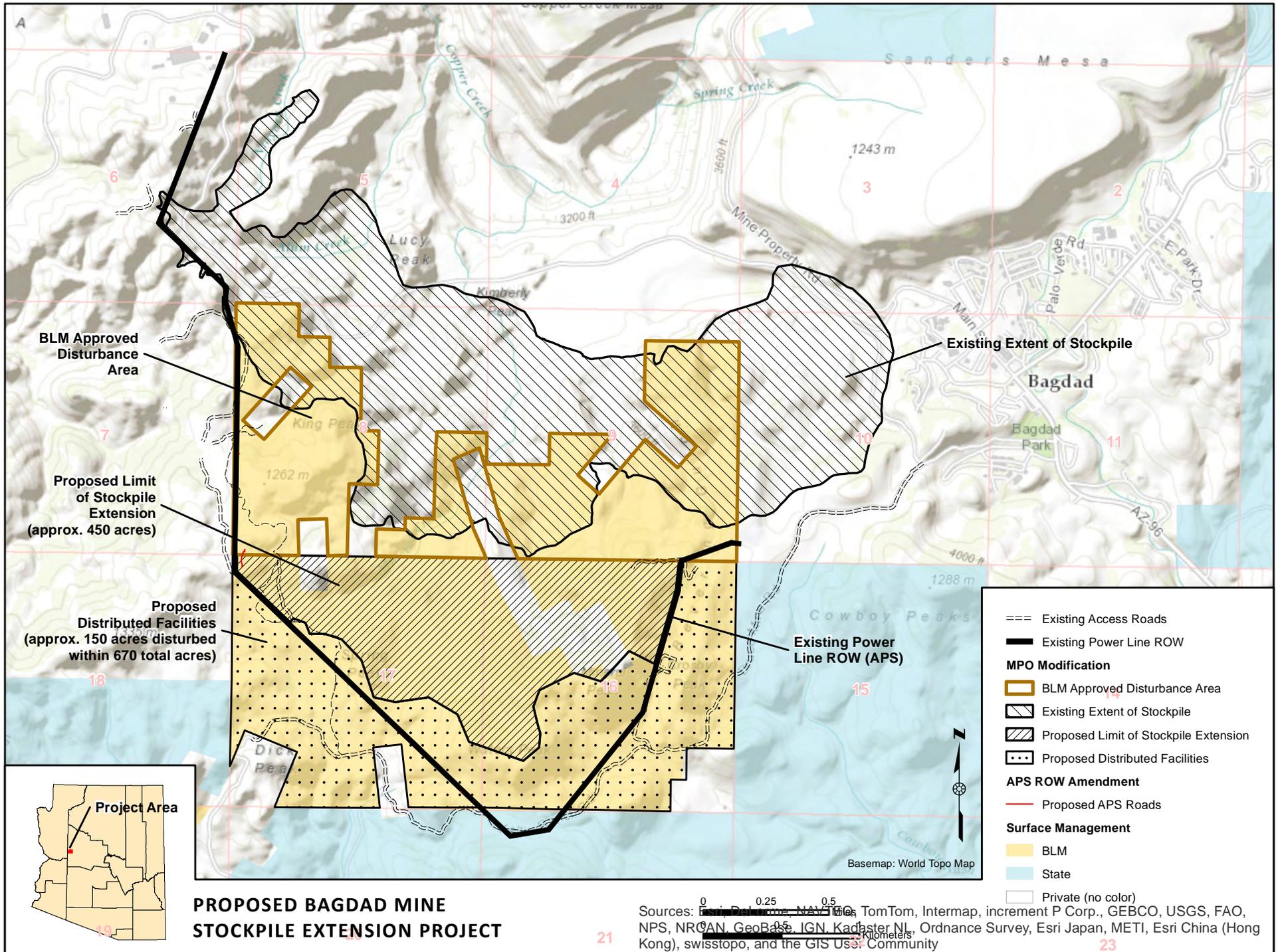
In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act of 1976, as amended, the BLM is conducting an environmental analysis of this proposal. NEPA requires federal agencies to consider the potential physical, biological, social, and economic effects of their actions on the environment. This proposal will be analyzed under either a NEPA Environmental Assessment (EA) or Environmental Impact Statement (EIS), depending upon the significance of issues identified during the scoping process. This scoping period is structured so, if BLM chooses to do an EIS, comments received during this scoping period will be sufficient to satisfy requirements of an EIS and no further scoping would be required.



Please submit your scoping comments!

Scoping will help identify the level of analysis (Environmental Assessment or Environmental Impact Statement), potential issues and concerns, and possible alternatives. The scoping period extends from **October 6 to November 4, 2014**. Comments may be submitted at the scoping meetings on the comment form provided or in writing to Bagdad Mine MPO Modification, Kingman Field Office, 2755 Mission Boulevard, Kingman, AZ 86401, or fax to 928-718-3761. Electronic comments may be submitted to blm_az_kfo_bagdad_mine@blm.gov. We can best use your comments if they are received no later than the end of the 30-day scoping period, **November 4, 2014**. However, comments will be taken throughout the NEPA process. For project information and updates, please visit the project website at <http://bit.ly/bagdadMPO>.

For further information regarding this proposal please contact the BLM project manager, Mr. Walter (Buzz) Todd, III, at (928) 718-3717 or by email at wtodd@blm.gov.



PROPOSED BAGDAD MINE STOCKPILE EXTENSION PROJECT

First
Class
Stamp
Here

Bagdad Mine MPO Modification
2755 Mission Boulevard
Kingman, AZ 86401

Fold Here

WELCOME

to the Bagdad Mine Proposed Stockpile Extension Project Scoping Meeting to:

- **Learn more about the proposed action**

Amending the Bagdad Mining Plan of Operations for:

- Extending the stockpile
- Future distributed facilities

Amending the APS right-of-way for:

- powerline maintenance roads

- **Meet the project team**

- **Submit scoping comments on:**

- Issues the document should address
- Potentially significant impacts that should be considered
- Suggested alternatives to the Proposed Action

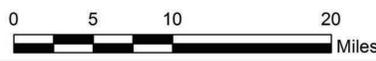
**Bagdad Mine
Proposed Stockpile Extension Project**



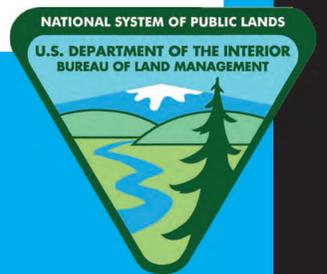


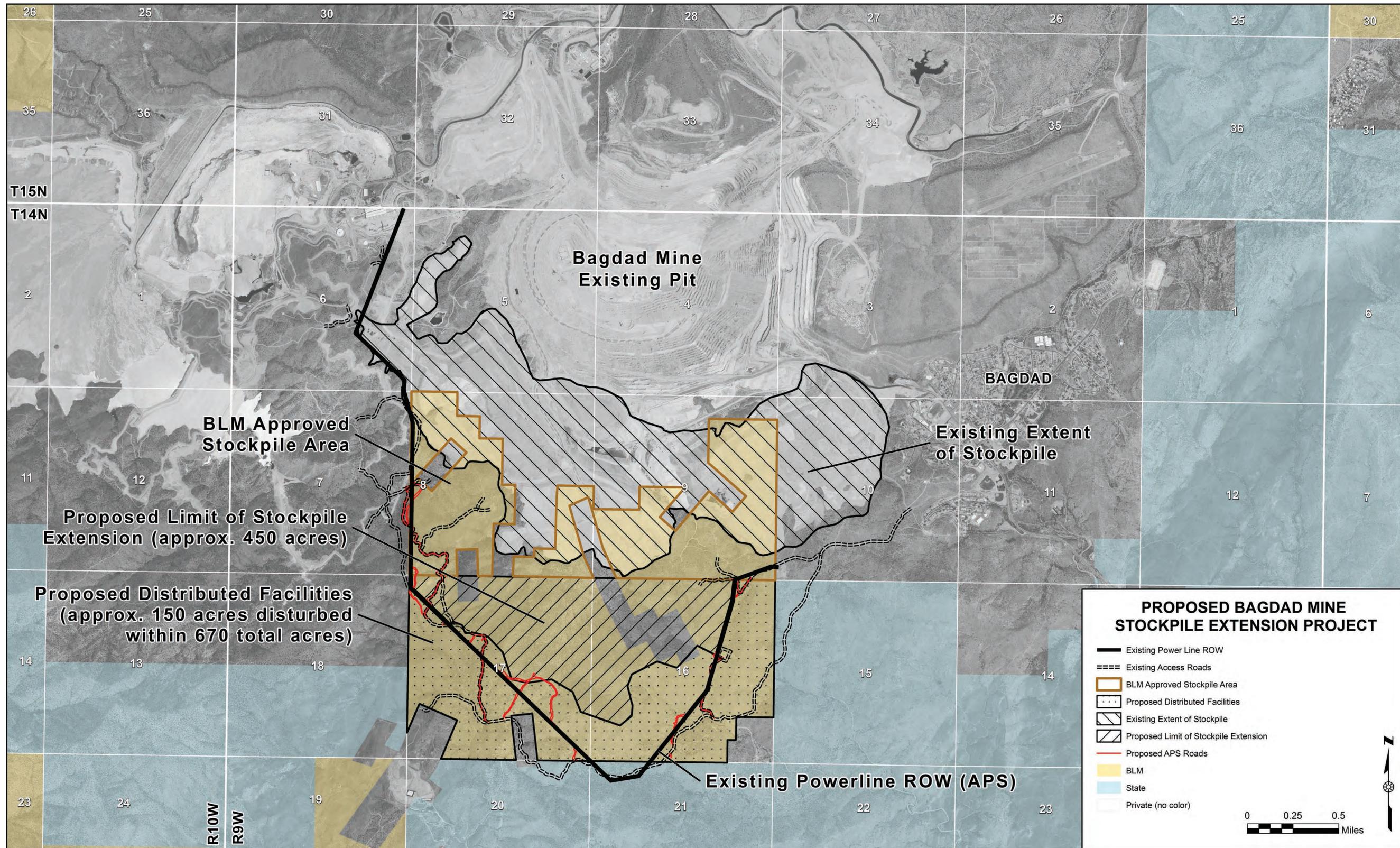
PROPOSED BAGDAD MINE STOCKPILE EXTENSION PROJECT

Project Area	BLM	Indian Lands	Cities and Towns
FMBI Holdings	BLM Wilderness	Military	Interstate Highway
	BOR	State	US Highway
	USFS	State Park/Wildlife Area	Local; State Highway
	USFS Wilderness	County	County
	USFWS	Private (white)	



Bagdad Mine Proposed Stockpile Extension Project





Bagdad Mine Proposed Stockpile Extension Project



FMBI Proposed MPO Modification

Stockpile Location

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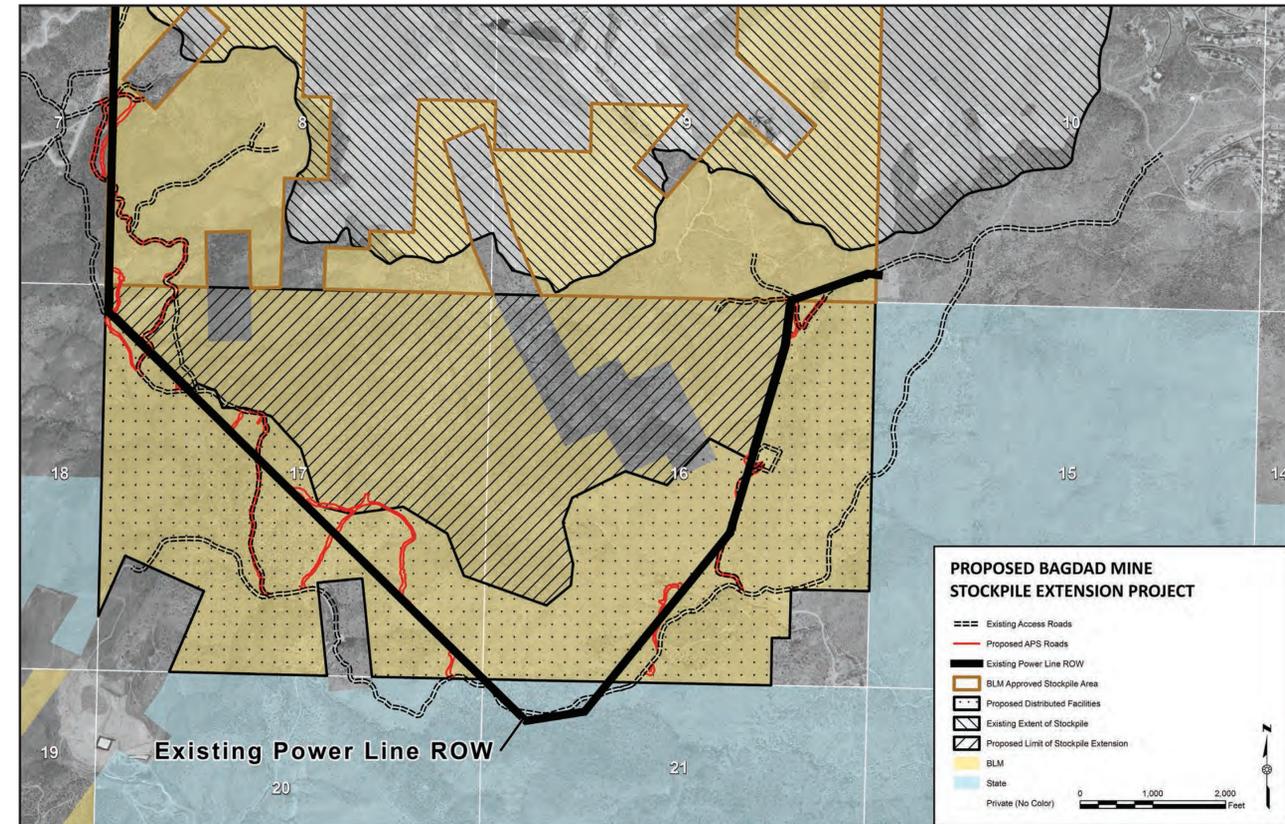
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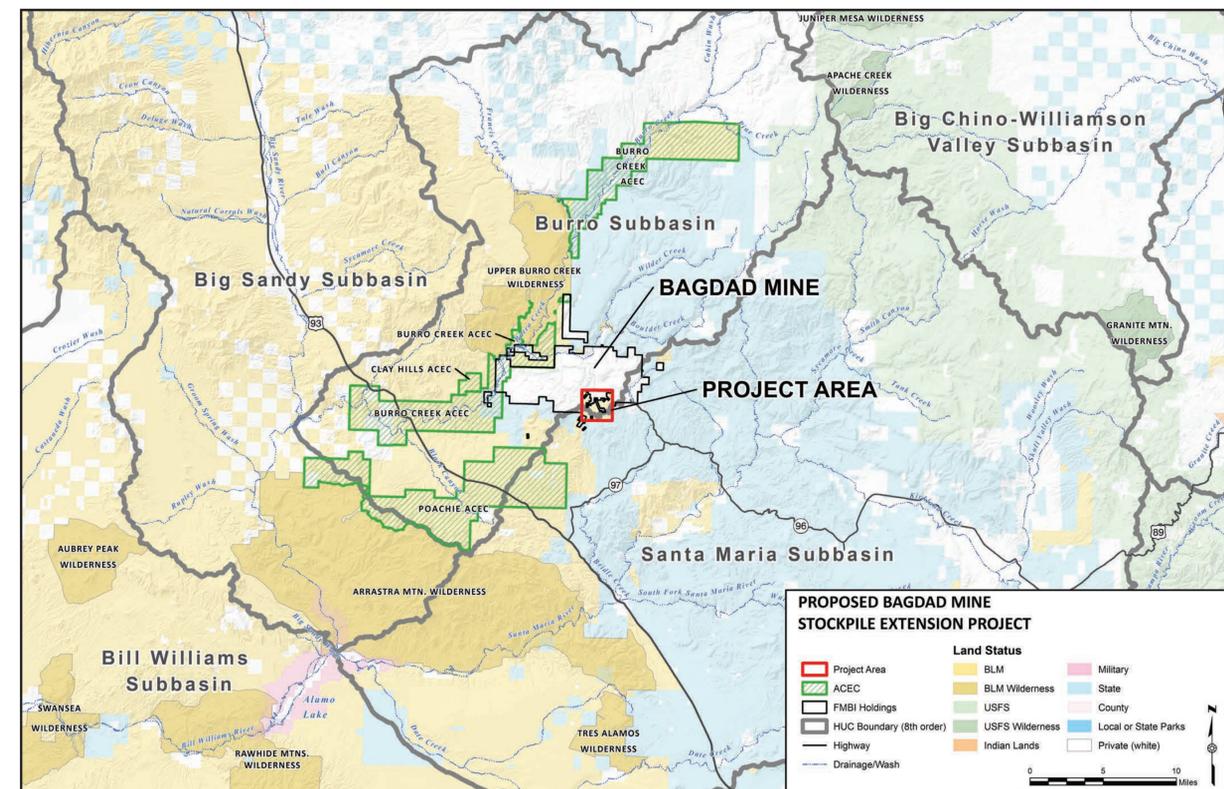
Bagdad Mine Proposed Stockpile Extension Project

Water Resources

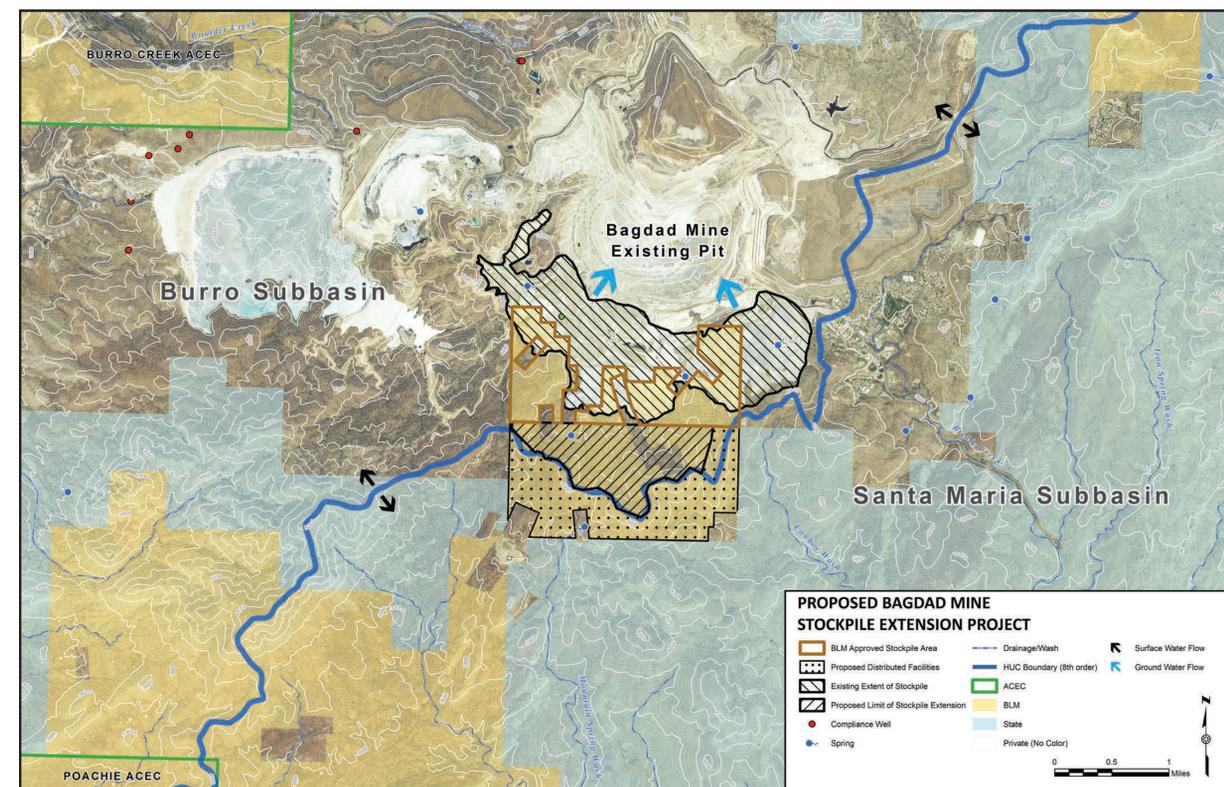
The BLM will evaluate impacts to water resources from the Proposed Action and alternatives.

- The proposed stockpile extension is located in the Burro Subbasin. Potential impacts to changes in the stream flow of Burro Creek will be evaluated.
- The southern boundary of the proposed stockpile extension generally corresponds to a drainage divide (ridgeline); stockpiled materials would not be placed south of this divide. Stormwater runoff from the stockpile extension would continue to be directed to the existing open pit to the north. There would be no discharge to downgradient surface waters from the proposed stockpile extension.
- The Bagdad Mine has a current, approved Arizona Aquifer Protection Permit (APP) for the monitoring and protection of groundwater quality. As part of the APP permit, the mine pit has been demonstrated to be hydrologically isolated, serving to capture potential pollutants to groundwater. The crystalline bedrock underlying the proposed stockpile extension has a restricted ability to transmit groundwater, and excavation of the open pit has created a cone of depression that draws groundwater toward the open pit.
- The proposed stockpile extension would not change the amount of water used by the existing Bagdad operations.

The BLM invites you to share your concerns about potential impacts on water resources that may result from the proposed action and how you think these impacts should be addressed.

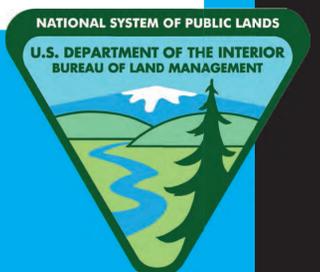


Regional hydrology



Project area hydrology

Bagdad Mine Proposed Stockpile Extension Project



Cultural and Tribal Resources

The preservation of Cultural Resources is an integral part of the BLM's multiple use mission.

- Cultural resources include archeological sites, historical sites, and places of traditional cultural significance.
- Potential cultural resources associated with this project may include archaeological sites and places of traditional or cultural significance to Native Americans.
- The BLM is required under Section 106 of the National Historic Preservation Act to consider the effects of the proposed action on cultural resources.
- In conformance with NEPA and Section 106 of the National Historic Preservation Act, the BLM has initiated consultation with interested tribes. The tribes can help identify cultural resources, evaluate their importance, and where possible, help the BLM to ensure their preservation.
- As part of the NEPA and Section 106 process, the BLM will work to identify and consider historic properties that might be affected by the undertaking and to attempt to resolve any adverse effects through consultation with the Arizona State Historic Preservation Office, tribal, state, and local governments, Indian tribes, the applicants, representatives from interested organizations, private citizens, and the public.
- The BLM and consulting parties will strive to reach agreement on measures to avoid, minimize, and mitigate adverse effects on historic properties and to find a balance between project goals and preservation objectives.

The BLM invites you to share your concerns about potential impacts on cultural resources that may result from the proposed action and how you think these impacts should be addressed.



Example of typical ceramic artifacts
(photograph of artifacts from the Bagdad region, but not from the project area).



Example of typical flaked stone artifacts
(photograph of artifacts in the Bagdad region, but not from the project area)

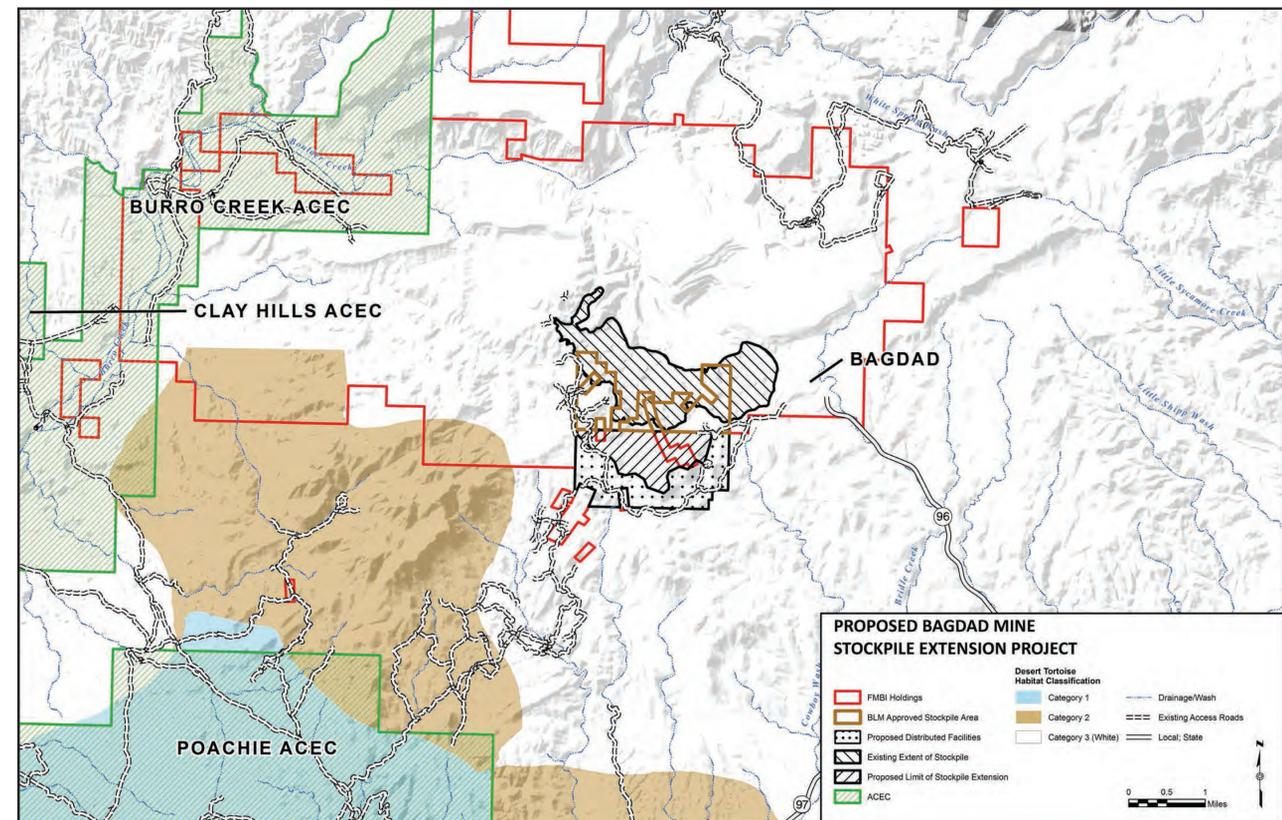
Bagdad Mine Proposed Stockpile Extension Project

Biological Resources

The BLM will evaluate impacts to biological resources from the Proposed Action. Some of the preliminary issues include the following:

- Potential impacts to special status species including 1) species listed under the Endangered Species Act, 2) species of greatest conservation need identified by the State of Arizona and, 3) species listed as BLM sensitive.
- The Proposed Action is located in desert tortoise Category III habitat. The category goal is to limit tortoise habitat and population decline to the extent possible by mitigating impacts.
- Potential impacts to bats, including Townsend's big-eared bat, cave myotis, and greater western mastiff bat.
- Potential impacts to migratory birds (e.g., gilded flicker, mourning dove, and red-tailed hawk).
- Potential impacts to general vegetation and riparian vegetation, including species listed in the Arizona Native Plant Law.
- Potential for the project to contribute to the introduction and/or spread of invasive plant species in the project area.
- Potential impacts to area springs and streams that could harm amphibians and native fish.
- Data collection surveys for vegetation and desert tortoise will be conducted in the Project Area. Additional studies will be conducted, as necessary.

The BLM invites you to share your concerns about potential impacts on biological resources that may result from the proposed action and how you think these impacts should be addressed.



General area landscape



Townsend's big-eared bat



Protected plant species

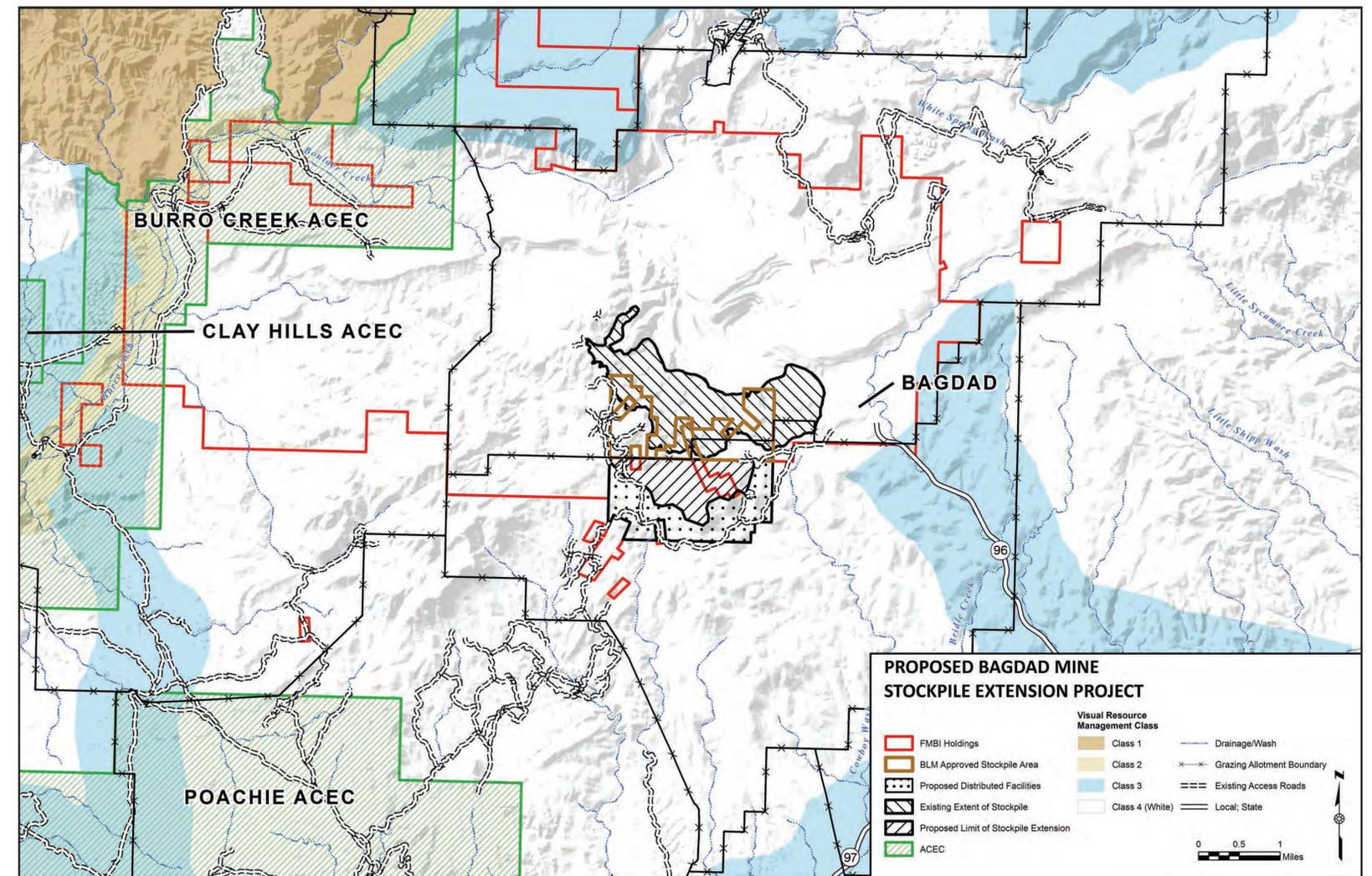
Additional Resource Analysis

The BLM will also analyze impacts to the following resources in the NEPA document for the Proposed Action and Alternatives:

- Visual resources - The Project Area is located in a Visual Resource Management (VRM) Class 4 area. The objective of this class allows for management activities which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high.
- Public Access and Recreation Resources
- Rangeland and Grazing
- Mineral Resources
- Air Quality / Climate Change
- Land Use and Transportation
- Socioeconomics / Environmental Justice

The BLM invites you to share your concerns about potential impacts on these resources that may result from the proposed action and how you think these impacts should be addressed.

Additional issues and concerns discovered during the scoping process will be addressed in the NEPA document.



NEPA Process

BLM Purpose and Need

BLM's purpose is to provide FMBI a location for their requested stockpile and distributed facilities to assure compliance with BLM's 43 CFR 3809 and 3715 regulations. The purpose is also to analyze and consider whether or not to amend APS's ROW to provide the maintenance access requested to assure compliance with the 43 CFR 2800 regulations. The need is established under FLPMA to respond to a technically complete Mining Plan of Operations and a request for ROW amendment for legal access.

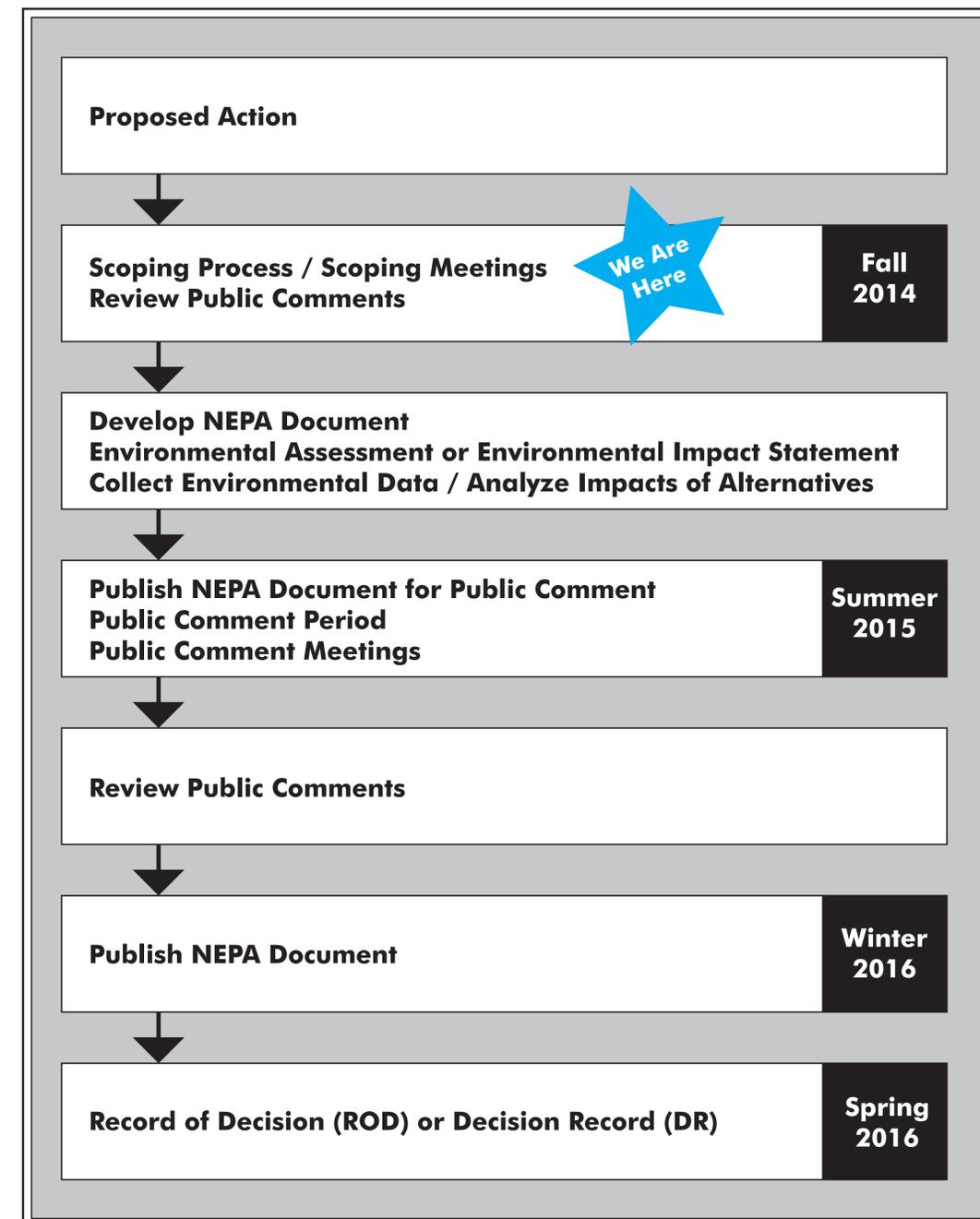
Decision to be made:

- Approve the actions as proposed
- Approve a portion of the actions
- Approve the actions modified to resolve issues
- Disapprove the actions

We are currently in the scoping process.

- Scoping will help identify the level of analysis (Environmental Assessment or Environmental Impact Statement), potential issues and concerns, and possible alternatives.
- The scoping period extends from **October 6 to November 4, 2014**.
- The Draft NEPA document is expected to be distributed for public comment in Summer 2015.
- **Public comment is welcome throughout the NEPA process.**

National Environmental Policy Act Process



APPENDIX D

Public Scoping Comments

Table D1. Coding Structure

Resource Issue	Category	Resource Code	Description
Access	ACCE	01	General Access
AIRQ	AIRQ	01	Dust
Biological Resources	BIOL	01	Special Status Species
	BIOL	02	Wildlife
	BIOL	03	Riparian habitat
	BIOL	04	General biology
Cultural Resources	CULT	01	Cultural Resources
Socioeconomics	ECON	01	General Economics
	ECON	02	Livestock/ranching industry
Health and Safety	HESA	01	General Health and Safety
Land Use	LAND	01	General Land Use
Livestock Grazing	GRAZ	01	General Grazing
NEPA	NEPA	01	Agency Consultation
	NEPA	02	Public Involvement
	NEPA	03	EA / EIS
	NEPA	04	Proposed Action
	NEPA	02	Purpose and Need
Reclamation	RECL	01	General Reclamation
Tribal Resources	TRIB	01	Tribal Consultation
Water Resources	WATE	01	Quantity/Usage
	WATE	02	Water Quality
	WATE	03	Groundwater
	WATE	04	General water resources



Table D2. Public Scoping Comments

Letter #	Name	Resource Category	Resource Code	Comment
1	Neal Hawkins	ECON	1	Mining is a vital part of the Arizona economy, both historically and in the present. This state and country can ill-afford to continue the recent trend of challenging any and all mining projects that are proposed, no matter how frivolous the arguments brought against them.
2	Greta Anderson, Western Watersheds Project	GRAZ	1	Include livestock grazing retirement as a mitigation option under all of the alternatives to be analyzed in the forthcoming NEPA analysis. Any expansion of mining infrastructure affecting public land should be offset through the relinquishment and retirement of grazing leases and permits held by Freeport McMoran and its subsidiary corporations on adjacent and nearby public lands.
3	Steve Spangle, U.S. Fish and Wildlife Service	BIOL	1	We have concerns about potential effects from this project to the endangered Arizona cliffrose (<i>Purshia subintegra</i>). The proposed action appears to occur within or in close proximity to the range and habitat for this plant. This plant is known from Tertiary limestone lakebed deposits. We recommend a habitat assessment and surveys for the Arizona cliffrose in appropriate soils. We encourage your office to work with our Flagstaff office to minimize any effects from the proposed action to Arizona cliffrose and its habitat if they are found within the expansion area.
3	Steve Spangle, U.S. Fish and Wildlife Service	NEPA	1	We also encourage you to continue to coordinate the review of this project with the Arizona Game and Fish Department.
3	Steve Spangle, U.S. Fish and Wildlife Service	TRIB	1	We encourage you to invite the affected Tribe(s) and Bureau of Indian Affairs to participate in the planning process and, by copy of this letter, are notifying the Hopi, Hualapai, and Colorado River Indian Tribes, the Yavapai Apache Nation, as well as Bureau of Indian Affairs.
4	Kristin Roer	ECON	2	The above water issue also needs to address whether this will impact the currently fledgling cattle industry.
4	Kristin Roer	LAND	1	The proposed project will permanently scar and damage the surrounding area.
4	Kristin Roer	NEPA	1	Where was our representative for Mohave County?
4	Kristin Roer	NEPA	2	A mass mailer should be sent out to increase community awareness and involvement.
4	Kristin Roer	NEPA	2	Another community meeting needs to be provided due to inadequate notification to the community. Newspapers are not delivered to Wikieup, therefore we do not receive announcements printed in them.
4	Kristin Roer	NEPA	3	An EIS needs to be done versus a simple environmental assessment.
4	Kristin Roer	WATE	1	Besides the EIS, a subsequent study should be done to see the effect of the existing water usage on surrounding communities, i.e. Loss of water to benefit the mine and its town.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
4	Kristin Roer	WATE	1	Water usage needs to be published publicly for all mine usage especially when the usage is coming from outlying communities.
4	Kristin Roer	WATE	1	Water needs to refrain from being pumped out of the Wikieup area for a period of 30 days or longer to document the effects of the mines pumps on the area.
4	Kristin Roer	WATE	2	What about chemical contaminants effecting runoff and groundwater?
4	Kristin Roer	WATE	3	What about chemical contaminants effecting runoff and groundwater?
5	Molly Meyer	NEPA	2	Need better publication of meetings
5	Molly Meyer	WATE	1	FMBI should be required to publish water usage numbers on a regular basis.
6	Donald Healey	ECON	1	The proposed Bagdad Mine MPO Modification is a nothing but a blatant giveaway to a large successful corporation. This expansion asks for approximately 600 acres of potentially environmentally sensitive public land to be used as a dump site and in return gives the public nothing; no new jobs, no new revenues! Even just considering the proposal the BLM is expending tax payer dollars with no recompense. This proposal, as structured, is a slap in the face to working Arizonians and should not proceed unless it is altered to provide tangible benefits to both the mining company and the public.
6	Donald Healey	NEPA	3	It absolutely should not be allowed to move forward without a complete Environmental Impact Statement (EIS).
7	Bert W. Kellis	ACCE	1	Access from private land on existing roads from private land to town of Bagdad.
7	Bert W. Kellis	AIRQ	1	Dust suppression that effects horses cattle, and private landowners.
8	David Conrey	LAND	1	This expansion on BLM Land would destroy it forever. The desert environment is fragile. Dumping tailings on our public land would be a disaster.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
9	Robert Faught, Julie Alpert	BIOL	1	<p>The Big Sandy and Santa Maria Rivers join and flow into Alamo Lake and downstream of Alamo Lake is the Bill Williams River which flows into the Colorado River. This entire system of surface, subsurface, and groundwater basin resources is known as the Bill Williams Watershed. Surface waters and riparian and uplands habitats provide vital and important habitat for several Federal listed species, associated Critical Habitat designations, migratory species, and proposed listed species. These species include the Southwestern Willow Flycatcher and Critical Habitat; the Yellow-Billed Cuckoo and Critical Habitat; the Northern Mexican Gartersnake and Critical Habitat; the Yuma Clapper Rail; the Razorback Sucker; the Bonytail Chub; and the proposed listed Sonoran Desert Tortoise. In addition to these species there are several sensitive species such as Lowland Leopard Frog and other amphibians and reptiles that need free flowing and ponded water to survive. Effects from water draw down for the mine expansion will need to be carefully considered and analyzed in regard to impacts to these listed, proposed, migratory, and sensitive species and their associated habitats to include habitat structure, diversity, and density of all vegetative strata as well as impacts to species prey base. Each species has very unique and specific habitat requirements for foraging, reproducing, nesting, roosting, denning, dispersal, cover, and migration. It will be most important to provide previous and current survey results per U.S. Fish and Wildlife Service protocol for the listed and proposed listed species within the Bill Williams Watershed. Sensitive species should be surveyed for using current scientific protocols on a per species basis that will ensure habitat coverage as well as peak timing of presence, mating, and nesting time periods to maximize survey results. Methodology of all surveys as well as survey results and statistical analysis should be provided for public review and comment.</p>
9	Robert Faught, Julie Alpert	BIOL	1	<p>Migratory birds such as the Zone-Tailed Hawk and Black Hawk which are known to inhabit the Burro Creek area as well as throughout the Bill Williams Watershed will also need to be analyzed for impacts from this proposed project.</p>
9	Robert Faught, Julie Alpert	BIOL	1	<p>The Bald Eagle and Golden Eagle will need to be evaluated for impacts.</p>
9	Robert Faught, Julie Alpert	BIOL	1	<p>The APS 115-kV power line may provide roosting, perching, nesting, or foraging structure for migratory or resident raptors (hawks, falcons, eagles, and owls). The power line will need to be built so as to avoid electrocution of these species.</p>
9	Robert Faught, Julie Alpert	BIOL	1	<p>The power line will also add additional and new perching locations for the Common Raven, a major predator of hatchling and juvenile Desert Tortoise.</p>



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
9	Robert Faught, Julie Alpert	BIOL	1	The proposed listed Sonoran Desert Tortoise (SDT) may occur and/or disperse or travel across the proposed project site and will therefore be treated as a Federally listed species for the analysis of this project. We would recommend that current U.S. Fish and Wildlife Service Mohave Desert Tortoise (MDT) survey protocols be adhered to for this species, to include a zone of influence survey to identify the potential for animals that occur near to or adjacent to the proposed project site. SDT surveys should include all observations of live and dead animals; sign such as scat, burrows, and tracks; and all sign should be categorized as to its age and stage of decomposition or use. Biologists conducting the surveys should be highly qualified and have conducted surveys for MDT as well as SDT to ensure a proficient and complete survey. Prior to any proposed project start up a 100% clearance survey will need to be conducted to clear the site of any potential SDT.
9	Robert Faught, Julie Alpert	BIOL	1	it is highly recommended that SDT exclusion fencing be constructed around the proposed project location prior to the 100% clearance survey and prior to any ground disturbing activities. This survey will also be helpful in identifying other burrowing species that might be considered sensitive such as Gila Monster, Rosy Boa, Kit Fox, or Grey Fox.
9	Robert Faught, Julie Alpert	BIOL	1	It is imperative that the impacts of current and proposed water use and draw down by the Bagdad Mine be analyzed for this expansion project as we believe that there is a strong nexus to the loss of both surface, sub-surface, and groundwater within the entire Bill Williams Watershed that currently and potentially will significantly affect the community of Wikieup and surrounding residents and wells, as well as Federal listed, proposed listed, migratory, and sensitive wildlife and their associated habitats.
9	Robert Faught, Julie Alpert	BIOL	2	Free standing water at the proposed project location will be a draw to wildlife of all kinds in the vicinity. Impacts to wildlife regarding water quality for drinking/bathing, as well as how water impoundments or tanks will provide escape mechanisms for trapped wildlife will need to be considered and analyzed. This will also include the use of water for dust control.
9	Robert Faught, Julie Alpert	ECON	1	Current and projected/proposed water use as it relates to the community of Wikieup well draw down (socio-economic impacts) and drought and climate change need to be seriously addressed in the NEPA analysis.
9	Robert Faught, Julie Alpert	NEPA	1	Additional Federal agency involvement should include the U.S. Fish and Wildlife Service, the Environmental Protection Agency, and the U.S. Army Corps of Engineers for a thorough analysis of all project impacts.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
9	Robert Faught, Julie Alpert	NEPA	2	Please extend the scoping comment period beyond November 4, 2014 to ensure that those people missed during the initial scoping have an opportunity to attend a 2nd public meeting in their community. It was apparent at the Wikieup public meeting that most of the residents of that community were not notified through the mail. Due to well draw down issues and questions regarding the proposed mine expansion it would be prudent to hold an additional public meeting in Wikieup. A request for additional public scoping meetings is pursuant to NEPA and should be considered and complied with.
9	Robert Faught, Julie Alpert	NEPA	2	Willow Creek Riparian Preserve, Inc. requests to be involved in any proposed mitigation measure development for impacts to all environmentally sensitive resources.
9	Robert Faught, Julie Alpert	NEPA	4	It is unclear as to how the Bagdad Mine would not use more water for this expansion than it currently does now. They will certainly need additional water for construction purposes as well as the expansion of the mine and the new leach fields that would be created while they continue to phase out the existing leach fields for the new locations of leaching and stockpiles. It is unclear as to whether existing leach fields will remain or some or all will be phased out as they expand into this new area. The representative from the Bagdad Mine stated that the mine would be deepened and expanded. Since the expansion of the mine seems to be directly correlated to the expansion of the stockpile and leach fields as well as ancillary facilities such as the APS 115-kV power line then the expansion itself should also be analyzed for impacts pursuant to NEPA as one total and complete project. Each portion of the overall project scope should not be piecemealed so that a complete and thorough analysis can be conducted and the public is made aware of the entire proposed project scope, purpose and focus.
9	Robert Faught, Julie Alpert	WATE	1	Current and projected/proposed water use as it relates to the community of Wikieup well draw down (socio-economic impacts) and drought and climate change need to be seriously addressed in the NEPA analysis.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
9	Robert Faught, Julie Alpert	WATE	1	It is unclear as to how the Bagdad Mine would not use more water for this expansion than it currently does now. They will certainly need additional water for construction purposes as well as the expansion of the mine and the new leach fields that would be created while they continue to phase out the existing leach fields for the new locations of leaching and stockpiles. It is unclear as to whether existing leach fields will remain or some or all will be phased out as they expand into this new area. The representative from the Bagdad Mine stated that the mine would be deepened and expanded. Since the expansion of the mine seems to be directly correlated to the expansion of the stockpile and leach fields as well as ancillary facilities such as the APS 115-kV power line then the expansion itself should also be analyzed for impacts pursuant to NEPA as one total and complete project. Each portion of the overall project scope should not be piecemealed so that a complete and thorough analysis can be conducted and the public is made aware of the entire proposed project scope, purpose and focus.
9	Robert Faught, Julie Alpert	WATE	1	Private residential wells within the Wikieup area are experiencing dramatic decreases of obtainable water. Several residents have had to increase the depth of their wells. In one example a resident that moved to Wikieup about 5 years ago put in a well at 60-feet and was told he would not have to worry about going deeper due to the amount of water available. He just recently spent about \$6000 to increase the depth to 160-feet and is now not able to get any water from this depth at all. He now has to spend additional time and money to haul water and has had to change the way his family contends with the lack of water available. Since he does not make a lot of money he cannot afford to drill a deeper well at this time. In another example, one resident that has filters on his well is now having to clean them daily due to the increased mud that is being drawn up - the water is becoming brackish - and he too fears that his well will also go dry.
9	Robert Faught, Julie Alpert	WATE	1	a private landowner recently deeded their hot springs property to the Hualapai Nation so that the springs would not run dry. The Hualapai Nation was successful in a lawsuit against Freeport-McMoRan in establishing a water drawdown agreement to keep the springs viable and productive for wildlife. Please include this recent conveyance of said private property to the Hualapai Nation in your analysis. This is important information that directly relates to the Bagdad's Mine draw down of the Big Sandy River basin for their current activities.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
9	Robert Faught, Julie Alpert	WATE	1	It is imperative that the impacts of current and proposed water use and draw down by the Bagdad Mine be analyzed for this expansion project as we believe that there is a strong nexus to the loss of both surface, sub-surface, and groundwater within the entire Bill Williams Watershed that currently and potentially will significantly affect the community of Wikieup and surrounding residents and wells, as well as Federal listed, proposed listed, migratory, and sensitive wildlife and their associated habitats.
9	Robert Faught, Julie Alpert	WATE	2	Free standing water at the proposed project location will be a draw to wildlife of all kinds in the vicinity. Impacts to wildlife regarding water quality for drinking/bathing, as well as how water impoundments or tanks will provide escape mechanisms for trapped wildlife will need to be considered and analyzed. This will also include the use of water for dust control.
10	William E. Hawes	ECON	1	This expansion makes it possible for one of the economic mainstays of Yavapai county to continue operations.
10	William E. Hawes	HESA	1	It is noted that the area proposed for this dump site has scrub oak vegetation (highly flammable) and abandoned mine sites. Covering this area will reduce the likelihood of fast moving range fires and cover potential hazards from old mine sites.
10	William E. Hawes	LAND	1	The area under consideration is remote, in an area that has little use other than marginal grazing land.
10	William E. Hawes	LAND	1	I am of the opinion that using this land as a mine waste dump is the best possible use for this land. It is remote, out of the way, does not impact waterways, and is unseen by the public.
11	Dennis DuVall	BIOL	1	The proposed expansion should be carefully studied If the 600 acres of the proposed new tailings pile and ancillary buildings would encroach on desert tortoise habitat... the Bagdad area environment is already compromised by many human activities that place the desert tortoise in harm's way. If the desert tortoise is threatened in the area under consideration for mining activities, the expansion should not be allowed to proceed at all.
11	Dennis DuVall	NEPA	3	I strongly urge you to draft an environmental impact statement for the proposed Bagdad mine expansion. The proposed expansion should be carefully studied If the 600 acres of the proposed new tailings pile and ancillary buildings would encroach on desert tortoise habitat.
12	goldenandrebecca@aim.com	NEPA	4	I am very concerned on the excess land in this proposal. The description that is attached to this area is no specific enough and needs to be VERY clear. Using words like "May include, but not limited to" and "other support facilities" leaves more questions than answers.
13	Lawrence Dandurand	RECL	1	What is the policy and plan to regenerate the land while conducting mine operations?



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
14	Hildy Angius, Mohave County	BIOL	3	Continual removal of substantial amounts of water from the Big Sandy Basin will have detrimental effects on wildlife and plant life in the area. Many species rely on the riparian areas adjacent to the Big Sandy. Adequate assessment of the impact to wildlife and riparian areas needs to be addressed.
14	Hildy Angius, Mohave County	NEPA	1	Mohave County should also be a Cooperating Agency in the NEPA process. The potential impacts of this project are too important for our residents to allow the County a more passive role.
14	Hildy Angius, Mohave County	NEPA	2	The Bureau of Land Management needs to repeat the scoping meeting in Wikieup, Arizona after providing adequate and expanded notice to the public. To accommodate a second meeting, the scoping process needs to be continued for at least an additional 60 days.
14	Hildy Angius, Mohave County	NEPA	2	Residents in the Big Sandy Basin were not adequately informed of the October 23, 2014 meeting. The failure to adequately notice the residents affected by the water withdrawals robbed many of the residents the opportunity to be informed and to voice their concerns. Mohave County hereby requests that the Bureau of Land Management repeat the scoping meeting after adequate public notice. The notice period needs to be extended for at least another 60 days.
14	Hildy Angius, Mohave County	WATE	1	The continual removal of substantial amounts of water from the Big Sandy Basin creates substantial environmental impacts. Local residents report the need to constantly deepen wells and degradation of the water quality in the Basin. These impacts need to be adequately documented and mitigated.
14	Hildy Angius, Mohave County	WATE	1	Freeport McMoRan has acquired the Planet and Lincoln Ranches and the company has applied to the Arizona Department of Water Resources to sever and transfer the water rights attached to those ranches to their Wikieup well field. The transfer of these water rights potentially allows additional extraction of water and increased damage to the Big Sandy Basin.
14	Hildy Angius, Mohave County	WATE	1	Water for the Bagdad Mine is drawn from the Big Sandy Basin limiting the water available for residents of the Basin. Residents are reporting dropping water levels in their wells and degradation of water quality. Withdrawals from the Basin to support the Mine are clearly stressing the aquifer.
15	Carolynn Bryan	BIOL	1	I strongly urge you to draft an environmental impact statement for the proposed Bagdad mine expansion. The proposed expansion should be carefully studied, especially if the 600 acres of the proposed new tailings pile and ancillary buildings would encroach on desert tortoise habitat.
15	Carolynn Bryan	BIOL	1	The Bagdad area environment is already compromised by many human activities that place the desert tortoise in harm's way. If the desert tortoise is threatened in the area under consideration for mining activities, the expansion should not be allowed to proceed at all.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
15	Carolynn Bryan	NEPA	3	I strongly urge you to draft an environmental impact statement for the proposed Bagdad mine expansion. The proposed expansion should be carefully studied, especially if the 600 acres of the proposed new tailings pile and ancillary buildings would encroach on desert tortoise habitat.
16	Frances K. Thomas	BIOL	1	Please consider, in discussion about expansion of the Bagdad Mine, the endangered wildlife there, especially the desert tortoise.
16	Frances K. Thomas	HESA	1	Considering endangerment of a community of people.
16	Frances K. Thomas	NEPA	3	Have you performed an EIS?
16	Frances K. Thomas	WATE	1	Consider, too, the use of precious water in a period of climate change.
17	Mary Ellen Hale	BIOL	4	Although some people might look at the landscape and say that there are "only some ocotillo, etcetera" out there, doesn't it stand to reason that the flora and fauna of the same landscape would be seen quite differently by a biologist?
17	Mary Ellen Hale	CULT	1	I know that the area under consideration has historically been utilized by the Yavapai and Hualapai people. Isn't it important to carefully survey the land and catalog cultural markers for the sake of posterity?
17	Mary Ellen Hale	ECON	2	I presume that the ranching families that have been utilizing this land for grazing have been good stewards or they would have forfeited their permit. I know that reducing a grazing allotment impacts the number of animals that a particular ranch would be able to have in its herd. Isn't such a reduction without compensation or the ability to obtain an alternate allotment akin to reaching into someone's wallet and taking out a significant amount of hard-earned dollars?
17	Mary Ellen Hale	NEPA	2	Wouldn't it be a good idea to publicize these meetings more broadly? Wouldn't it ensure the perception that transactions such as the proposed mine extension are truly in the best interest of our country?
17	Mary Ellen Hale	NEPA	2	How can the citizens of our country be assured of the integrity of this transaction without more comprehensive communication?
17	Mary Ellen Hale	NEPA	3	I encourage the implementation of a full and fair environmental impact statement. If, for no other reason than to archive the life of a canyon, an EIS is an important next step.
17	Mary Ellen Hale	WATE	4	Since Arizona is a semi-arid environment that has experienced a population boom resulting in ever-increasing demands for water, isn't it important to secure a comprehensive hydrological evaluation of the effects of this proposal on the watershed?
18	David Kilby - Concerned Citizens of Wikieup (signed by 38 individuals)	HESA	1	We, the concerned citizens of Wikieup submit our concerns... Fire and safety issues.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
18	David Kilby - Concerned Citizens of Wikieup (signed by 38 individuals)	HESA	1	We also request the assistance of FMBI in establishing a new firehouse with one fire truck and necessary ancillary equipment to support a Local Volunteer First Response Team. Unfortunately, due to our location, emergency response teams must travel many miles in order to lend aid in emergency situations. The length of this journey pushes the travel time of these needed services to exceed 45 minutes which is often tragically too late, as demonstrated by homes recently lost to fires.
18	David Kilby - Concerned Citizens of Wikieup (signed by 38 individuals)	WATE	1	We, the concerned citizens of Wikieup submit our concerns... Loss of drinking water from our existing water wells in and around our community
18	David Kilby - Concerned Citizens of Wikieup (signed by 38 individuals)	WATE	1	Our community consists of approximately 400+ families and ranchers that make up the town of Wikieup and the surrounding area for which the water supplies subsistence. We have witnessed, over the past 5 years, a depletion of our drinking water resource due to the continued water withdrawal by Freeport-McMoRan for its continued mining operation located in Bagdad. We understand that FMBI has requested a continuance of its mining operation for an additional 40 years, which will continue to deplete our water access and reserves. This depletion of our water resources is, and will continue to be, a drain on our resources financially for years to come and will place a great deal of hardship on the local community.
18	David Kilby - Concerned Citizens of Wikieup (signed by 38 individuals)	WATE	1	We therefore, request that FMBI create a slush fund of \$1,000,000 USD to be used and distributed to families within the community that require the deepening and servicing of their private water wells, due to the lowering of the water table. The slush fund will be governed by three locally elected trustees that can determine its best usage by demonstrating to the trust fund and its governance guidelines that they have lost their water due to the lowering of the water table.
19	Thomas Slaback, Sierra Club	BIOL	1	The area is also habitat for the desert tortoise, a designated Endangered animal.
19	Thomas Slaback, Sierra Club	NEPA	3	Requests that a full EIS be performed for the projected tailings/overburden site expansion. An EIS must be undertaken because the current site has leaked heavy metals into Burro Creek. Any new siting must be proven to never leak or have any other impact to the Burro Creek hydrological system. The area is also habitat for the desert tortoise, a designated Endangered animal. Again this requires the completion of an EIS.
19	Thomas Slaback, Sierra Club	WATE	2	The current site has leaked heavy metals into Burro Creek. Any new siting must be proven to never leak or have any other impact to the Burro Creek hydrological system.
20	Bayard H.Brattstrom	BIOL	2	The proposed area is prime habitat for Gila Monsters, a protected species in Arizona. A biological survey and impact/mitigation study should be made on this species.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
20	Bayard H.Brattstrom	BIOL	2	The area is also known to have a recently introduced (by Game and Fish Dept.) of Big Horned Sheep. Impact of the project on these animals should be studied.
21	David Conrey	LAND	1	As far as our public land goes it must be protected. This plan would trash it forever
22	Kelly Norton, Arizona Mining Association	ECON	1	In 2013, the Arizona mining industry employed approximately 12,100 people and had an estimated direct and indirect impact on the Arizona economy of nearly \$5 billion.
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	AIRQ	1	Fugitive dust emissions from the proposed Stockpile extension would be regulated under the Bagdad Mine air quality permit. The air quality permit requires that FMBI use reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Understanding that the potential for fugitive dust emissions is a concern for neighboring property owners, FMBI will work to minimize and reduce any potential adverse effects of the proposed Stockpile extension.
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	BIOL	1	Field reconnaissance and habitat evaluation have not identified Sonoran desert tortoise or tortoise sign in the area of the Stockpile or proposed Stockpile extension (dating back to the 1995 Draft Environmental Impact Statement (EIS) and including current, separate investigations conducted for both FMBI and APS).
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	CULT	1	Previously performed cultural resource studies identified a few cultural sites that have been recommended as eligible for listing on the National Register of Historic Places (NRHP). Avoidance and mitigation measures related to eligible sites have been incorporated into APS's power line construction in the existing ROW. To the extent the MPO Modification and ROW Amendment raise issues related to cultural resource sites eligible for listing on the NRHP, those issues will be resolved in a similar fashion through the appropriate consultation process



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	LAND	1	<p>FMBI holds legal interests in the areas proposed for disturbance in the MPO Modification through the ownership of patented claims, as well as the ownership of unpatented claims located on BLM-managed public lands. The proposed MPO Modification conforms to BLM regulations for surface mining on public lands under the General Mining Law of 1872, which is implemented under 43 CFR 3809, as mandated by the Federal Land Policy and Management Act (FLPMA). As provided in the description of the BLM's decision to be made, BLM could disapprove or withhold approval of the MPO Amendment, as proposed. Pursuant to 43 CFR 3809.411(3), disapproval or withholding approval of the MPO Amendment could only be decided if the plan: does not meet the applicable content requirements; proposes operations that are in an area segregated or withdrawn from the operation of the mining laws; or proposes operations that would result in unnecessary or undue degradation of public lands. In its decision, BLM could also impose modifications to the proposed MPO Modification to prevent undue or unnecessary degradation of public lands. However, BLM's authority to disapprove or withhold approval of the proposed MPO Modification is limited because the General Mining Law of 1872 gives miners with properly located claims the right to conduct mining operations (including stockpiling activities) on public lands, subject only to the stipulations of a mine plan of operations. Further, the BLM operates under a multiple use mandate established under FLPMA. For the project area, the Kingman RMP provides management guidance to minimize environmental damage from mineral development and rehabilitate affected lands. The Kingman RMP directs BLM to encourage and facilitate the development by private industry of public land mineral resources in a manner that satisfies national and local needs and provides for economically sound exploration, extraction, and reclamation activities. The activities proposed on land managed by the BLM under the proposed MPO Modification are consistent with and in compliance with the Kingman RMP guidelines and policies.</p>



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	NEPA	3	<p>A review of the intensity factors demonstrates that the potential impacts from the proposed action are minimal and not severe. Any potential impacts are not controversial and are common to the area, which has been used for mining for over 100 years. The following factors demonstrate that an environmental assessment (EA) is appropriate for this project: As recently as 2012, BLM approved the extension of Stockpile placement activities immediately adjacent to the Stockpile under consideration in the current proposal. That extension was approved with a determination of NEPA adequacy based on the 1996 EIS for FMBI's MPO. The environmental setting for the Stockpile extension is adjacent to and nearly identical to that approved only two years ago, and thus, it is reasonable to conclude that the same conditions exist that allowed a similar approval in the recent past.</p> <p>In the MPO Modification, FMBI proposes no changes in mining operation methods, mining rates, or water usage and recommits to its high standard of environmental stewardship.</p> <p>BLM, finding no significant impacts, issued a right-of-way in 2009 for APS construction of the power line using an EA, and the APS proposed action is simply allowing safe and reliable, long-term access for maintenance of their facilities in the existing ROW.</p> <p>BLM's internal scoping did not identify any potentially significant effects, and public comments received to date have not changed this. BLM did not expect that the MPO Modification or ROW Amendment had a potential for regional or national controversy, and comments received to date have not changed this.</p> <p>The proposed action is not one which would "normally require preparation of an EIS," as listed in the BLM's NEPA Handbook.</p> <p>Based on the forgoing, BLM should proceed to evaluate the MPO Modification and ROW Amendment under an EA.</p>
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	NEPA	4	<p>FMBI recommends that in its NEPA documentation and related materials, the BLM should make clear that it currently is considering two proposed actions: (1) the MPO Modification, and (2) the ROW Amendment. These proposed actions have different applicants and are independent of each other. The proposed actions also are governed by separate and different regulatory programs within the BLM: the MPO Modification is governed by 43 CFR 3809 et seq.; and the APS ROW Amendment is governed by 43 CFR 2800 et seq. While both of these programs implement the Federal Land Management and Policy Act (FLMPA), the specific requirements, measures, procedures, approval methodologies, policies, and related processes are distinctly different. There must be: Two, separate and independent no action alternatives, Two, separate and independent sets of alternatives, and Two, separate and independent records of decision.</p>



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	NEPA	4	<p>There is no “connected” relationship between the MPO Modification and the ROW Amendment. As the project descriptions provided to BLM in FMBI’s and APS’s applications make clear, none of the access roads APS is seeking for its power line O&M are necessary for, or currently planned to be used as any part of, FMBI’s Stockpile extension. Likewise, APS’s access roads are not seeking to rely on or otherwise depend on any of the planned operations under the Stockpile extension. In short, these projects are completely independent of each other. Each of the projects do not automatically, or otherwise, trigger the other (or any other projects for that matter). Each of the projects can and will proceed without the other; each of the projects have independent utility. Finally, these projects are not parts of a larger proposed project, or otherwise rely on such an action for their justification (they are not aspects of a broader proposal). Instead, as discussed, one of these projects seeks to extend a previously approved stockpile project, and the other seeks to provide road access for O&M activities for a previously approved power line project. The MPO Modification and the ROW Amendment are not “connected actions” under 1508.25(a)(1). Similarly, the two proposed actions also are not “cumulative actions” under 1508.25(a)(2). Cumulative actions are proposed actions that potentially have a cumulatively significant impact together with other proposed actions and “should be discussed” in the same NEPA document. Based on internal and public scoping to date, no potentially significant issues have been identified for either project, and no potentially significant cumulative impacts have been identified. Thus, the two actions are not cumulative actions, which would mandate that they be analyzed in the same NEPA document. At most, the only relationship between these two proposed actions is that they may be implemented at about the same time, in the same area (similar timing and geography). Therefore, to the extent they have any relationship, it is as “similar actions” under 1508.25(a)(3). Similar actions need not be considered together in the same NEPA document, but can be if doing so would increase the quality and efficiency of the analysis, and otherwise provide a stronger basis for decision making, pursuant to the BLM NEPA Handbook § 6.5.2.3. While it is not clear to FMBI that evaluating the two proposed actions in one NEPA document will produce a more efficient NEPA process, FMBI acknowledges BLM’s decision to do so – as “similar actions.”</p>



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	NEPA	4	FMBI is aware that the Mohave County Board of Supervisors (“County”) provided written and oral comments to BLM suggesting that the MPO Modification would extend the life of FMBI’s Bagdad Mine by 25 years. In those comments, the County appears to suggest that the operation of the Bagdad Mine is a connected action with the MPO Modification. As stated in Section 6.5.2.1 of BLM’s NEPA Handbook, “[c]onconnected actions are limited to actions that are currently proposed (ripe for decision).” The Bagdad Mine is not a currently proposed action before BLM or any other agency; the mine is an existing project and has long been such. Therefore, it is not a connected (or any other) action with the MPO Modification (or the ROW Amendment).
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	NEPA	5	The BLM NEPA Handbook states that the purpose and need statement should “briefly specify the underlying purpose and need to which the agency is responding.” Therefore, we put forth for consideration the revised statements of purpose and need for the two proposed actions below: <i>For the proposed MPO Modification, BLM’s purpose is to authorize FMBI’s proposed surface disturbances necessary to (1) provide an extension of the existing, consolidated Plan IX Leach and South Waste Rock stockpiles (the Stockpile) using efficient and effective methods and equipment, and (2) identify constraints to planning and future construction of distributed facilities needed for mining operations. The need for this action is established by the policies and mandates set out in the Kingman Resource Management Plan (RMP), the Federal Land Policy and Management Act of 1976, and the General Mining Law of 1872. As such, the BLM needs to respond to a request to modify an existing mine plan of operations, submitted by FMBI pursuant to 43 CFR 3809 for additional surface disturbances to public lands administered by the BLM. For the proposed ROW Amendment, BLM’s purpose is to authorize the surface disturbances necessary to afford APS safe, reliable, and cost-effective access adequate to support long-term maintenance to their existing power line right of way. The need for this action is established by the policies and mandates set out in the Kingman RMP and the Federal Land Policy and Management Act of 1976. As such, the BLM needs to respond to a request to amend an existing right of way, submitted by APS pursuant to 43 CFR 2800 et seq., for additional surface disturbances to public lands administered by the BLM.</i>



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	WATE	1	The proposed MPO Modification (and ROW Amendment) does not change the amount of water demand needed for the proposed Stockpile extension or the operation of the Bagdad Mine. Also, as explained under the discussion of the life of mine, the proposed action has no bearing on the length of time that water withdrawals would occur. FMBI holds water rights issued by the Arizona Department of Water Resources for water use. There would be no increase of water use for the proposed action. Further, water use for mine operations will continue to be in accordance with those allocated and permitted by the state.
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	WATE	2	The proposed Stockpile extension has no relationship to Burro Creek, which is located approximately five miles northwest of the existing mine pit. The proposed stockpile extension will be located on the north side of the ridgeline on a nearly impervious slope on the south side of the existing open pit. Surface water discharges from the proposed Stockpile extension (as with the existing Stockpile) are captured by the existing open pit.
23	Sheila Logan, Freeport-McMoRan Bagdad Inc.	WATE	3	The direction of groundwater flow from the area underlying the proposed Stockpile extension is toward the cone of depression, or hydraulic sink, created by the open pit. The hydraulic sink has been demonstrated to persist long after mine operations cease, through closure and post-closure, and is established as a passive containment capture zone and Best Available Demonstrated Control Technology (BADCT) pursuant to the Aquifer Protection Permit (APP) issued by the Arizona Department of Environmental Quality.
24	Bayard H.Brattstrom	BIOL	2	The Arizona Dept. of Game and Fish has introduced Big Horned Sheep into the Hell's Half Acre Mountains just to the west of the project. The sheep are surviving, and expanding their range. They may move into the project area and the area should be checked for them. Fortunately, many are radio tagged. See Jeff Pebworth for further information (AZGF). There are models for all three species in the literature re: habitat quality which should lead to just a bit of ground proofing.
24	Bayard H.Brattstrom	BIOL	2	There are still concerns about water drainage, the EIR should present convincing proof that no toxic or polluted waters or ground waters can go into the Burrow Creek Drainage. That would be an ecological nightmare considering how many species of amphibians, reptiles, birds, fish, live in that drainage.
24	Bayard H.Brattstrom	WATE	2	There are still concerns about water drainage, the EIR should present convincing proof that no toxic or polluted waters or ground waters can go into the Burrow Creek Drainage. That would be an ecological nightmare considering how many species of amphibians, reptiles, birds, fish, live in that drainage.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
25	Nicholas S. Hont, Mohave County	BIOL	3	riparian areas along the Big Sandy River will experience stress and degradation in quality
25	Nicholas S. Hont, Mohave County	ECON	2	The traditional activities of ranching and farming may not be supported by the declining water resources.
25	Nicholas S. Hont, Mohave County	NEPA	1	Mohave County should also be a Cooperating Agency in the NEPA process. The potential impacts of this project are too important for our residents to allow the County a more passive role.
25	Nicholas S. Hont, Mohave County	NEPA	3	As water continues to be drawn from the Big Sandy Basin, the aquifer will continue to be stressed, and resident's access to available water will decline. The traditional activities of ranching and farming may not be supported by the declining water resources. Further, riparian areas along the Big Sandy River will experience stress and degradation in quality. These impacts seem significant enough to warrant a full Environmental Impact Statement on the proposed project.
25	Nicholas S. Hont, Mohave County	WATE	1	Extending the active life of the mine 25 years beyond the life allowed by the current stockpile area will place a greater strain on the water availability in the Big Sandy Basin having serious implications for Mohave County residents living and working in the Big Sandy Basin.
26	Tom O'Neil	ECON	1	The stockpile extension is an important element to the Bagdad Mine, a very important contributor to the local and state economy.
26	Tom O'Neil	NEPA	3	There appears to be no significant negative impacts to the environment from this project. Timely approvals should be in order.
27	Robert Loyd	ACCE	1	Continue access to public lands for recreational activities.
28	Trevor Buhr, AGFD	BIOL	1	AGFD's Online Environmental Review Tool that... along with a concise list of Heritage Data Management System (HDMS) species located within close proximity to the project location, as well as a list of Arizona's Species of Greatest Conservation Need (SGCN) for the project area, which distribution models indicate could be located in the project area. Please conduct field surveys to verify occupancy by these species prior to disturbance.
28	Trevor Buhr, AGFD	BIOL	1	Though USFWS has not completed the process of identifying critical habitat for this species, and it is not likely to be found within the project footprint, the Mexican Garter Snake has been documented in the nearby Big Sandy drainage system – with critical habitat for this newly listed species likely to be designated not far to the Northwest of this project's footprint.



Table D2. Public Scoping Comments, Continued

Letter #	Name	Resource Category	Resource Code	Comment
28	Trevor Buhr, AGFD	WATE	2	The Department's [AZGFD] concern for impacts to water quality in the Santa Maria Basin to the South of the project footprint. The Department would advocate that if the preferred alternative is approved, that monitoring of water quality to the South and West of the new stock pile be initiated – even as monitoring currently occurs to the North and West of the existing stock and leach piles associated with the mine.
29	Rowle P. Simmons, Yavapai County	ECON	1	WHEREAS, the Bagdad Mine is a major commercial enterprise in Yavapai County, and provides quality jobs and other significant economic benefit for Yavapai County, and; WHEREAS, the proposed stockpile extension is a necessary and reasonable for the continued operation of the Bagdad Mine, and; WHEREAS, the Board of Supervisors understands the BLM will undertake an analysis under the National Environmental Protection Act (NEPA) to determine and minimize possible disruption or loss of historical and prehistoric cultural resources, visual resources, wildlife habitat, livestock grazing, recreational and public access, and water resources the proposed stockpile extension may cause, and; WHEREAS, the Yavapai County Board of Supervisors finds that the BLM' s Proposed Bagdad Mine Stockpile Extension Project if designed and developed properly will result in considerable economic benefit Yavapai County with minimal negative consequences.

