PROPOSED THACKER PASS LITHIUM MINE PROJECT
ENVIRONMENTAL IMPACT STATEMENT
PUBLIC SCOPING REPORT

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U.S. Department of the Interior
Bureau of Land Management

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The Bureau of Land Management is responsible for the stewardship of our public lands.
The BLM's mission is to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

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ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
AUM	Animal Unit Month
BLM	Bureau of Land Management
CARA	Comment Analysis and Response Application
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DOI	Department of the Interior
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
HMA	Herd Management Area
HRFO	Humboldt River Field Office
LNC	Lithium Nevada Corp.
NDCNR	Nevada Department of Conservation and Natural Resources
NDOT	Nevada Department of Transportation
NDOW	Nevada Department of Wildlife
NEPA	National Environmental Policy Act
NOI	Notice of Intent
PoO	Plan of Operations
RMP	Resource Management Plan
ROD	Record of Decision
SETT	Sagebrush Ecosystem Technical Team
U.S.	United States
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VRM	Visual Resource Management

1.0 INTRODUCTION

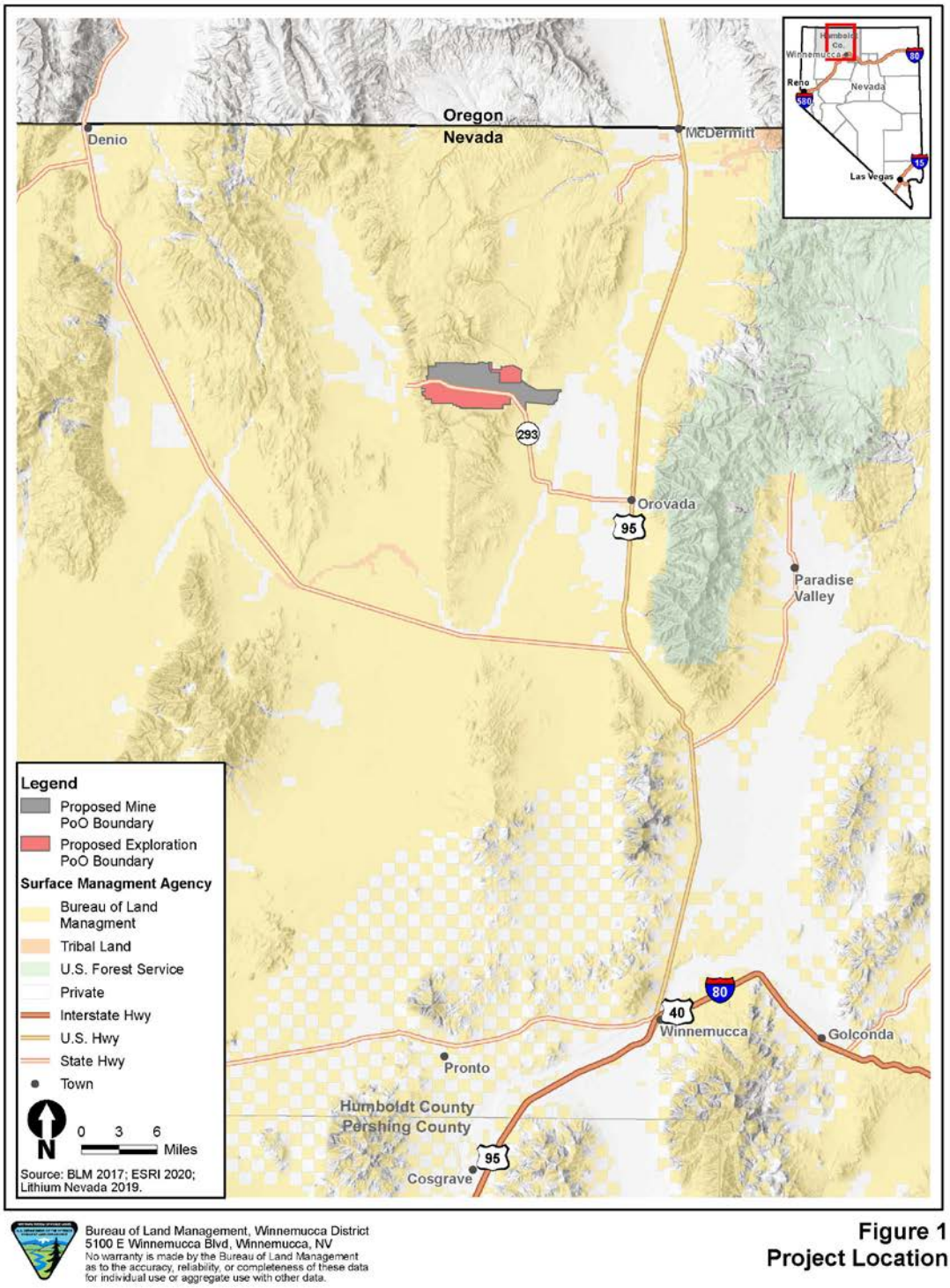
In compliance with the National Environmental Policy Act (NEPA), the United States (U.S.) Department of the Interior, Bureau of Land Management (BLM), is preparing an environmental impact statement (EIS) to address potential effects of a proposed open pit lithium mine, a processing operation, and continued exploration of adjacent lands located in northern Humboldt County, Nevada, approximately 20 miles west-northwest of Orovada, 62 miles north-northwest of Winnemucca, and approximately 20 miles south of the Oregon border (**Figure 1**).

Lithium Nevada Corp. (LNC) submitted the *Thacker Pass Mine and Reclamation Plan of Operations* (BLM Casefile NVN-098586) and the *Thacker North-South Exploration Plan of Operations and Reclamation Plan* (NVN-098582), collectively referred to as the Thacker Pass Lithium Mine Project (Project), to the BLM Humboldt River Field Office (HRFO). LNC proposes to develop the Project in accordance with BLM Surface Management Regulations under 43 Code of Federal Regulations (CFR) 3809.

The proposed Project area would include a total of approximately 18,195 acres (Mine and Reclamation Plan of Operations [PoO] boundary of 10,468 acres; Exploration PoO boundary of 7,727 acres) with an estimated total disturbance footprint of approximately 5,695 acres (Mine and Reclamation PoO area disturbance of 5,545 acres; Exploration PoO area disturbance of 150 acres). The surface and subsurface mineral estates associated with the Project are located on public lands administered by the BLM, Winnemucca District (WD); no state or private lands are included in the Project area. The Project would have a life expectancy of approximately 41 years. Closure and reclamation of the Project is anticipated to require another five years. LNC would develop the Project in two phases (Phase 1 and Phase 2) over the estimated life-of-mine.

Scoping is the process by which the BLM solicits internal (BLM) and external (public, tribal, and agency) input on the issues, impacts, analysis methods, and potential alternatives that will be addressed in a document such as an EIS. This report describes public scoping activities the BLM conducted for the proposed Thacker Pass Lithium Mine Project EIS; summarizes comments received during the public scoping period; and provides a preliminary list of issues, concerns, and opportunities for analysis in the EIS.

Figure 1. Proposed Thacker Pass Lithium Mine Location Map



2.0 PUBLIC SCOPING PROCESS

The public scoping process provides opportunities to:

- Introduce the proposed action, purpose and need statement, and preliminary issues identified by the lead agency preparing the EIS.
- Engage state, local, and tribal governments and the public in refining preliminary issues and identifying new issues to be analyzed in the EIS.
- Refine the proposed action and identify potential alternatives.
- Identify other past, present, and reasonably foreseeable actions that warrant analysis in the EIS.
- Identify permits, surveys, or consultations required by other agencies.
- Identify other interested parties to consult with during the NEPA process.

2.1 Scoping Notifications

The formal public scoping process began with publication of a notice of intent (NOI) in the *Federal Register* on January 21, 2020 (**Appendix A**). The BLM invited the public to submit comments during the scoping period from January 21, 2020 through February 27, 2020. The NOI notified the public of the BLM's intent to prepare an EIS, provided information about the proposed action, described the purpose of the scoping process, and identified methods to provide comments.

As part of the scoping process, the BLM hosted scoping meetings for the public and other interested parties to learn about and submit comments on the Thacker Pass Lithium Mine Project (see Section 2.2, *Scoping Meetings*). The BLM advertised the scoping meetings through a news release published on January 21, 2020 (**Appendix A**). The news release gave an overview of the proposed action; provided the meeting location, date, and time; explained the purpose of the scoping meetings; identified methods for making comments; and provided contact information for questions regarding the proposed Thacker Pass Lithium Mine. Additionally, project background and public scoping information was available on the BLM's ePlanning website.

2.2 Scoping Meetings

The BLM hosted two scoping meetings, held February 5, 2020 and February 6, 2020 (**Table 1**). The scoping meetings gave agencies, organizations, the public, and other interested parties an opportunity to learn and ask questions about the proposed Thacker Pass Lithium Mine and to share issues and concerns with the BLM. The BLM gave a presentation regarding the NEPA process and then LNC provided an overview of the proposed Project. After the presentations the BLM and LNC answered questions in an open house meeting format to encourage open and informal dialog between the public and agency representatives. Representatives from the BLM included the BLM project manager and members of the BLM interdisciplinary team and management from the Humboldt River Field Office. LNC representatives were also in attendance to answer technical questions from the public, as needed.

Table 1. Scoping Meeting Location

Date and Time	Location
February 5, 2020 5:00 p.m. – 7:30 p.m.	The Winnemucca Convention Center 50 West Winnemucca Boulevard, Suite 1 Winnemucca, NV 89445
February 6, 2020 5:00 p.m. – 7:30 p.m.	The Orovada Community Center East Kings River Highway Orovada, NV 89425

The BLM provided informational materials including a project fact sheet and informational posters at the scoping meeting describing the proposed Thacker Pass Lithium Mine Project and the scoping process. Comment forms were provided at the meeting with instructions on how to submit scoping comments (**Appendix B**).

2.2.1 Scoping Meeting Attendance

A total of 10 people (not including BLM staff, LNC representatives, or consultants working on the Project) signed into the meeting in Winnemucca and a total of 25 people signed into the meeting in Orovada.

2.3 Tribal Consultation

The BLM continues to consult with the Fort McDermitt Paiute and Shoshone Tribe, Summit Lake Paiute Tribe, and Winnemucca Indian Colony regarding the proposed Project.

2.4 Federal, State, and Local Cooperating Agency Consultation

The BLM has consulted with the federal, state, and local cooperating agencies in **Table 2** during the EIS scoping process and will continue to consult throughout the EIS process.

Table 2. Federal, State, and Local Cooperating Agencies consulted by the BLM

Agency	Responsibility	MOU w/ BLM
U.S. Environmental Protection Agency (USEPA)	Human Health and Environment	Yes
U.S. Fish and Wildlife Service (USFWS)	Threatened and Endangered Species, Migratory Birds, Wetlands	No[1]
Nevada Department of Wildlife (NDOW)	Wildlife, Migratory Birds, Sensitive Species	Yes
Nevada Department of Conservation and Natural Resources (NDCNR), Sagebrush Ecosystem Technical Team (SETT)	Natural Resources, Greater Sage-grouse	Yes
Humboldt County	Human and Natural Resources	Yes

[1] BLM/USFWS coordination is directed by DOI Secretarial Memorandum on inter-agency NEPA actions.

MOU = Memorandum of Understanding

3.0 PUBLIC SCOPING COMMENTS

3.1 Scoping Comment Documents Received

Within this report, the full content of each electronic submittal or mailed letter is referred to as a "comment document." Each comment document received containing unique text was bracketed and coded into one or more "comments" using the methods described in Section 3.2, *Scoping Comment Processing*. The BLM received 26 unique comment documents. Of the 26 comment documents submitted, one was received via the BLM's online Comment Analysis and Response Application (CARA) platform, one comment document was hand delivered at the Orovada scoping meeting, and the remaining 24 comment documents were received by the BLM via email (**Table 3**).

Table 3. Number of Comment Documents Received By Submission Method

Submission Method	Number of Comment Documents
CARA	1
Hand Delivered	1
Email	24
TOTAL	**26**

As shown in **Table 4**, the largest number of comments documents were attributed to interest groups (35 percent of total comment documents) and individuals who indicated no affiliation with an interest group (35%). These comments documents accounted for approximately 35 percent of total comment documents, respectively. Individuals who indicated a state or local government affiliation accounted for 15 percent and federal agencies accounted for 8 percent. Comments were received from the Center for Biological Diversity, the Coalition for Nevada's Wildlife, Earthworks, U.S. Environmental Protection Agency (USEPA), Friends of Animals, Great Basin Resource Watch, Nevada Department of Environmental Protection – Bureau of Safe Drinking Water, Nevada Department of Transportation (NDOT), Nevada Division of Water Resources, Nevada Chapter of the Backcountry Hunters and Anglers, Nevada State Historical Preservation Office, Theodore Roosevelt Conservation Partnership, Trout Unlimited, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service (USFWS), and the Western Watersheds Project. No comments from tribal groups were received.

Table 4. Number of Comment Documents Received by Affiliation

Affiliation Category	Number of Comment Documents
No Affiliation Included or Withheld	9
Interest Group	9
Business	2
Federal Agency	2
State Agency	4
Tribal	-
TOTAL	**26**

3.2 Scoping Comment Processing

The BLM used a systematic process to catalogue, organize, sort, and summarize comments submitted during scoping. The following seven steps describe the process used for processing comment documents, identifying and bracketing comments, and grouping comments into issue categories:

1. Sort comments by issue category.
2. Summarize comments by issue category in a narrative form to describe the general questions and concerns associated with each category (see Section 3.4, *Summary of Scoping Comments by Issue Category*).
3. Develop issue statements to identify questions, concerns, and opportunities to address during preparation of the Thacker Pass Lithium Mine EIS.

3.3 Scoping Comments by Issue Category

The BLM identified 348 scoping comments from the 26 comment documents. **Table 5** reports the number of scoping comments coded to each issue category. The greatest number of comments were associated with water resources (107), followed by fish and wildlife (59) and air quality and greenhouse gases (24), reclamation (21) and wastes, hazardous or solid and public safety (21).

Table 5. Number of Comments by Issue Category

Issue Category	Number of Comments Per Issue Category	Percentage of Total Scoping Comments
Air Quality and Greenhouse Gasses	24	6.9%
Alternatives	4	1.1%
Analysis Methods and Assumptions	14	4.0%
Cultural Resources	2	<1%
Cumulative Effects	9	2.6%
Environmental Justice	2	<1%
Financial Surety	3	<1%
Livestock Grazing	6	1.7%
Mitigation	7	2.0%
NEPA Process	15	4.3%
Project Description/Plan of Operations	1	<1%
Public Access	5	1.4%
Reclamation	21	6.0%
Recreation	2	<1%
Socioeconomics	2	<1%
Stakeholder Involvement	6	1.7%
Transportation	7	2.0%
Tribal Consultation	7	2.0%
Vegetation including Wetlands	2	<1%
Visual Resources	13	3.7%

Issue Category	Number of Comments Per Issue Category	Percentage of Total Scoping Comments
Wastes, Hazardous or Solid/Public Safety	21	6.0%
Water Resources	107	30.7%
Wilderness and ACECs	8	2.3%
Wildlife	59	17.0%
Wild Horses	1	<1%
TOTAL	**348**	**-**

3.4 Summary of Scoping Comments by Issue Category

This section summarizes comments submitted during scoping that are within the scope of the Thacker Pass Lithium Mine EIS. Comment summaries are grouped into issue categories based on the content and substance of the comment. **Appendix C** contains the text of all comments extracted from the comment documents.

3.4.1 Issue Statements

The BLM scoping process is intended to identify resource categories and capture issues for analysis related to the proposed Thacker Pass Lithium Mine Project. Public scoping comments are reviewed by the BLM for substance, content, and relevance to the Project and EIS analysis. Each comment is assigned to a specific resource or area of concern and related issue statements are subsequently developed to summarize comments upon a specific resource or topic. In the following sections, each group of related comments are summarized in specific issue statements for each resource or topic. Some topics are summarized without issue statements. Those comments that the BLM has determined to be beyond the scope of the EIS analysis or non-substantive opinion-based statements are not included in the comment summaries or issue statements.

The BLM's interpretation and summarization of scoping comments does not constitute agreement or disagreement with the content of the scoping comments. The purpose of this report is to present the issues raised in the scoping comments for consideration during the NEPA process. Additionally, because each comment was coded to only one issue category, but may express concerns related to multiple issues, the comment summaries below attempt to capture comments coded to each specific category as well as related comments that may have been coded to different categories.

Air Quality and Greenhouse Gases Comment Summary

Impacts to local and regional air quality and from particulate matter; hazardous air pollutants; and other emissions including mercury, chlorine, and sulfur gas. Climate change from the proposed action due to increased greenhouse gas emissions and fugitive dust from mining and processing activities.

Air Quality and Greenhouse Gases Issue Statements

- How would particulate matter, combustion emissions, greenhouse gases from the Proposed Action and alternatives affect air quality locally and on a regional scale?
- How would fugitive dust affect air quality locally and on a regional scale?

Alternatives Comment Summary

Analyze an adequate range of alternatives to the Proposed Action in order to evaluate whether options exist that would avoid or reduce impacts to the human and natural environment. Alternatives in project siting, design, and processing methodologies were mentioned as potential areas of consideration.

Alternatives Issues Statements

- What reasonable alternatives will be analyzed in the DEIS and how will they be compared?
- Are there reasonable alternatives to the proposed mine site and processing area?

Analysis Methods and Assumptions

Analyze all applicable baseline information and consider potential direct, indirect, and cumulative effects from all proposed infrastructure and actions. Analysis of a worst-case scenarios resulting from climatic or geologic events and the proposed actions consistency with environmental protection measures was also requested. No issue statements were developed to summarize these comments.

Cultural Resources Comment Summary

Survey of the proposed project area for historic and cultural artifacts and develop mitigation plans for any affects sites or cultural resources.

Cultural Resources Issues Statements

- How would the Proposed Action and alternatives affect properties eligible for listing on the National Register of Historic Places?

Cumulative Effects Comment Summary

The effects of all past, present, and reasonably foreseeable actions be analyzed in conjunction with the potential effects of the Proposed Action and any connected actions. Specific resources noted in the cumulative effects analysis comments included air quality and greenhouse gas emissions. No issue statements were developed to summarize these comments.

Environmental Justice Comment Summary

Identify minority and low-income populations potentially disproportionally affected by the Proposed Action in the EIS and disclose any potential adverse effects.

Environmental Justice Issue Statement

- How would transportation of hazardous materials and waste affect nearby environmental justice populations and local communities?

Financial Surety Comment Summary

Sufficient financial surety to account for mine closure, reclamation, and post-closure monitoring should be calculated and described in the EIS and required under any project approval. No issue statements were developed to summarize these comments.

Hazardous or Solid Wastes/Public Safety Comment Summary

Analyze potential effects of transporting, storing, and processing various chemical substances during the lithium mining and production process. Potentially hazardous chemical compounds that would be used on-site are requested to be inventoried and accounted for in a comprehensive chemical management

plan which also provides information on emissions of potentially harmful substances, including sulfur and chlorine gas. Commenters also requested that the BLM require the applicant to monitor waste rock, coarse gangue, and the clay tailings filter stack for emissions of harmful substances or gases. Include analysis of toxic plumes that could be created under emergency or disaster related circumstances.

Hazardous or Solid Wastes

- How would processing activities affect the local and regional waste stream?
- How would transportation of hazardous materials and waste affect nearby local communities?

Livestock Grazing Comment Summary

The economic effects of the proposed project upon livestock permittees within and near the project area. The anticipated loss of Animal Unit Months (AUM) by livestock permittees directly affected by the proposed project are of specific concern to the local ranching community. In addition, analysis of water and vegetation and other resources that local ranching operators rely upon was requested by multiple commenters.

Livestock Grazing

- How would the Proposed Action and alternatives affect grazing allotments, AUMs, range improvements, and pasture rotations?
- How would the proximity of the clay tailings filter stack affect livestock logistics along Pole Creek Road?

Mitigation Comment Summary

The EIS identify and describe appropriate mitigation measures to address adverse effects of the proposed project. In addition, the effectiveness, enforcement, and funding of each mitigation measure be analyzed and disclosed in the EIS.

Mitigation Issue Statements

- What mitigation measures are necessary during operations, closure and post-closure, and which ones are LNC, the BLM, or other agencies responsible for?
- What monitoring is required for surface water and groundwater quality?
- What mitigation measures are required to minimize criteria air pollutant emissions from the mine and how will the BLM monitor hazardous air pollutants?
- What mitigation plan is in place for habitat replacement?
- What are the BLM and Nevada Division of Environmental Protection reclamation bonding requirements and how are funds ensured for the completion of reclamation and closure activities?
- How is long-term monitoring and management enforced?

NEPA Process Comment Summary

The EIS include and analyze all applicable baseline information and consider potential direct, indirect, and cumulative effects from all proposed infrastructure and actions and explore mitigation measures to address each foreseeable effect. The effects of all past, present, and reasonably foreseeable actions be

analyzed in conjunction with the potential effects of the Proposed Action and any connected actions. No issue statements were developed to summarize these comments.

Project Description/Plan of Operations Comment Summary

Requested analysis of potential effects to the natural environment from the construction and operation of the proposed open pit and the identification of alternatives that could reduce or avoid adverse resource effects. A concern that the Plan of Operations could be expanded in the future to mining claims held by the applicant in the Montana Mountains was expressed. No issue statements were developed to summarize these comments.

Public Access Comment Summary

Public access to the Montana Mountains for recreation and other uses are not affected by the proposed project in addition to assurances from the applicant that current public access levels be maintained. Specific concern for potential closures of Pole Creek Road and other public access routes was noted.

Public Access Issue Statement

- How would the Proposed Action and alternatives affect the adjacent private property owners' ability to access their property?
- How would explorations activities along Pole Creek Road (e.g. Project vehicle traffic, drill rigs) affect public access and safety?

Reclamation Comment Summary

A detailed account of measures that would be taken to decommission mine operations and stabilize and revegetate slopes, waste rock facilities, leach piles, tailing impoundments, roads and other areas of disturbance. Also requested was information regarding stockpiling and placement of growth media during mine operations through closure and reclamation. Discussion of the approach of using synthetic or natural covers to seal post-mining features and the long-term public safety considerations for the stability of the tailings facility was also requested. Information regarding the long-term monitoring of reclamation and post-mining features was requested. Other comments requested that the reclamation plan address potential leaks in wastewater and other process containment systems. No issue statements were developed to summarize these comments.

Socioeconomics Comment Summary

Analysis of economic and social effects upon the local communities and the capacity of existing infrastructure to withstand the effects and demands resulting from the proposed project and anticipated new work force that would be required to staff the operation was stated. Other comments requested analysis of the economic impacts to the local ranching and agricultural operations in Humboldt County.

Socioeconomics Issue Statements

- How would the Proposed Action and alternatives affect local and regional social and economic conditions through jobs, tax revenues, and local and regional spending?
- How would the Proposed Action and alternatives affect demand on local and regional resources and services (e.g., housing, roads, schools)?
- How would the Proposed Action and alternatives affect quality of life and non-market values of local and regional populations?

Stakeholder Involvement Comment Summary

The streamlined permitting process was placing a burden on members of the public to review information in a limited amount of time and these commenters requested further time to review scoping information provided by the BLM. They appreciate the public outreach efforts the BLM and the applicant have conducted. No issue statements were developed to summarize these comments.

Traffic and Transportation Comment Summary

Analysis of the project related truck and vehicle trips and potential public safety effects of the additional traffic on local routes. Also discussed the potential need for and feasibility of posting additional signage regarding truck and hazardous material traffic and the proposed projects potential effects upon NDOT traffic and incident response planning. Installation of cattle guards on all project access roads to restrict livestock access to the mine site or highways was requested.

Traffic and Transportation Issue Statement

- How would the Proposed Action and alternatives impact local and regional traffic volumes, traffic patterns, and public access?

Tribal Rights Comment Summary

The details and results of tribal consultation be included in the EIS and that efforts should be made to avoid or mitigate impacts to culturally sensitive sites. Lands included within the Treaty of Ruby Valley between the U.S. government and the Western Shoshone Nation are not under the jurisdiction of the BLM.

Tribal Rights Issue Statement

- How would the Proposed Action and alternatives affect important tribal sacred or religious sites, settings, or other important tribal values or resources?

Vegetation including Wetlands Comment Summary

The EIS should consider the alternative of avoiding sensitive vegetation communities and species. In addition, the EIS consider the project's potential effects upon wetlands and to isolated and jurisdictional wetlands or other waters.

Vegetation and Wetlands Issue Statements

- How would surface disturbance from the Proposed Action and alternatives affect vegetation communities and their long-term productivity and ecological landscape function?
- What would be the extent of impacts on jurisdictional waters of the United States from the Proposed Action and alternatives?
- How would the Proposed Action and alternatives affect riparian and wetland areas along Thacker, Pole, and Crowley creeks?

Visual Resources Comment Summary

The proposed project's effects on the natural form, scenic quality, Visual Resource Management (VRM) status, and existing dark sky qualities of the existing Thacker Pass viewshed was voiced. Inquiries about potential mitigation to avoid and reduce effects to dark skies and scenic quality of the area and the

requirement for a minimum 90-day public review period for the draft EIS in the event that a Resource Management Plan (RMP) amendment is required was raised.

Visual Resources Issue Statements

- How would the Proposed Action and alternatives affect visual resources in the Project area?
- How would nighttime lighting affect night skies?

Water Resources Comment Summary

Several comments focused on water and water related topics including the project's:

- Potential effects on water quality, both surface and groundwater;
- Potential effects on water quantity, both surface and groundwater;
- Stormwater management designs, monitoring, and implementation;
- Potential for pit lake formation;
- Effects to groundwater from exploratory drilling;
- The need for a robust water monitoring and mitigation plan;
- Questions regarding the methodologies of applicant developed groundwater modeling;
- Information regarding other federal and state water related permits;
- Potential effects on wetlands or other waters;
- Potential drawdown effects to existing wells in the Kings River and Quinn River valleys;
- Anticipated water use and effects on public and private water rights;
- Potential effects upon streamflows in Pole Creek, Crowley Creek, and Thacker Creek; and
- Potential pit dewatering.

Water Resources Issue Statements

- How would the proximity of the clay tailings filter stack affect streamflow and water quality in Pole Creek?
- How would the West Waste Rock Storage Facility potentially affect water quality in Thacker Creek?
- How would pit dewatering affect baseflows in nearby springs and streams?
- How would pit dewatering affect the adjacent property owner's well or water supply?
- How would exploration activities affect sedimentation to Pole Creek?
- What would be the effects of exploration drilling and methods used on groundwater that supports streamflow in Pole, Crowley, and Thacker creeks?

Wilderness and ACECs Comment Summary

The BLM should analyze alternatives that would designate the Montana Mountains and Double H Mountains as Areas of Critical Environmental Concern (ACECs) in order to focus management upon preserving important wildlife habitat for greater sage-grouse, Lahontan cutthroat trout, Bighorn sheep, and other sensitive wildlife species. Since the BLM is considering an amendment to the Winnemucca RMP for visual resources, the BLM should also take this opportunity to consider the designation of new ACECs.

Wildlife and Special Status Species Comment Summary

Several comments focused on wildlife related topics including the project's:

- Effects to bighorn sheep, their habitat, and migration patterns;
- Effects to greater sage-grouse and their habitat;
- Effects to Lahontan cutthroat trout and their habitat;
- Effects to sensitive plants and their habitat;
- Effects to mule deer, their habitat, and migration patterns;
- Effects to golden eagles and their habitat;
- Effects to migratory birds and their habitat;
- Effects to pygmy rabbits and their habitat;
- Effect to pronghorn antelope and their habitat; and
- Effects to cold and warm water fisheries.

Wildlife and Special Status Species Issue Statements

- How would blasting activity/noise affect greater sage-grouse?
- How would exploration activities in the North exploration area affect Lahontan cutthroat trout populations within Pole Creek?
- How would exploration in the North and South exploration areas affect wildlife and greater sage-grouse?
- How would exploration in the South exploration area affect BLM sensitive plants?
- How would the Proposed Action and alternatives affect bighorn sheep use and movement of the project vicinity and potential movement through the Thacker Pass area?
- How would the Proposed Action and alternatives affect the availability and quality of habitat for terrestrial game and non-game species?
- How would nighttime lighting affect bat populations?

Wild Horses Comment Summary

A single comment asked that the BLM analyze potential effects to wild horses in the Little Owyhee, Owyhee, Snowstorm Mountains, Rock Creek, and Little Humboldt Herd Management Areas (HMA). These HMAs are located greater than 50 miles to the east of the proposed project location.

Non-substantive Comments Summary

Approximately 60 comments were submitted related to issues such as general opinions for or against mining, the viability of the product in the market, or requesting that the EIS analyze topics that are speculative or are not within the scope of this environmental analysis. These comments are not included in **Table 5** or **Appendix C** summaries.

4.0 NEXT STEPS IN THE PROCESS

The BLM will consider the comments submitted during scoping and the issues identified in this scoping report when preparing the EIS and developing alternatives to the proposed action. Alternatives will be

developed in consultation with participating cooperating agencies and other stakeholders. A final list of issue statements that will be brought forward for analysis in the draft EIS will be compiled from the issues identified through public scoping, issues raised during ongoing consultation with cooperating agencies and stakeholders, and issues identified through internal scoping among the BLM interdisciplinary team. In the draft EIS, the BLM will analyze for each issue statement potential effects from implementing the proposed action and the alternatives, as well as effects from reasonably foreseeable actions on the lands within the proposed project area.

The draft EIS is currently scheduled for publication in May 2020. A notice of availability will be published in the Federal Register announcing availability of the draft EIS for public review and comment. During the 90-day public comment period for the draft EIS, the BLM will hold public meetings, which will be announced on the ePlanning website, through mailings to contacts on the project mailing list, and through other notification methods. The BLM will respond to all substantive written comments submitted during the public comment period for the draft EIS, then prepare the final EIS. A notice of availability for the final EIS will be published in the Federal Register announcing its public release. The final EIS is scheduled to be released in the fall of 2020.

The BLM will prepare a Record of Decision (ROD) to document the selected alternative and identify any accompanying mitigation measures. The BLM will issue the ROD no sooner than 30 days after the notice of availability for the final EIS is published in the Federal Register.

Appendix A

Scoping Notifications

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NOTICE OF INTENT

THACKER PASS LITHIUM MINE NEWS RELEASE

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Parcel A

Sixth Principal Meridian, Colorado

T. 2 N., R. 94 W.,
Sec. 20, NW1/4NE1/4 and NE1/4NW1/4.
The area described contains 80 acres.

Parcel B

Sixth Principal Meridian, Colorado

T. 2 N., R. 94 W.,
Sec. 16, SW1/4SE1/4.
The area described contains 40 acres.

Parcel C

Sixth Principal Meridian, Colorado

T. 2 N., R. 94 W.,
Sec. 15, NE1/4SW1/4.
The area described contains 40 acres.

Parcel D

Sixth Principal Meridian, Colorado

T. 3 S., R. 94 W.,
Sec. 15, SW1/4SE1/4.
The area described contains 40 acres.

The BLM is no longer accepting land-use applications affecting the subject public lands, except applications to amend previously filed right-of-way applications or existing authorizations to increase grant terms in accordance with 43 CFR 2807.15 and 43 CFR 2886.15.

During the segregation period, the BLM will evaluate the parcels for suitability to offer for sale. If the BLM finds that the lands are suitable for sale, it will publish another Notice of Realty Action in the **Federal Register** announcing its decision to offer the land for sale.

This Notice also initiates an official 2-year notification to grazing use authorization holders that the BLM is considering disposing of the subject lands and that such authorizations may be cancelled in accordance with 43 CFR 4110.4–2(b).

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire Comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Any adverse comments will be reviewed by the BLM Colorado State Director or other authorized official of the Department of the Interior, who may sustain, vacate, or modify this realty action and issue a final determination. In the absence of timely filed objections, this realty action will become the final determination of the Department of the Interior.

(Authority: 43 CFR 2091.2–1(b)).

Jamie E. Connell,

Colorado State Director.

[FR Doc. 2020–00850 Filed 1–17–20; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[20X.LLAZ921000.L14400000.BJ0000. LXSSA2250000.241A]

Notice of Filing of Plats of Survey; Arizona

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of official filing.

SUMMARY: The plats of survey of the following described land are scheduled to be officially filed 30 days after the date of this publication in the Bureau of Land Management (BLM), Arizona State Office, Phoenix, Arizona. The surveys announced in this notice are necessary for the management of lands administered by the agency indicated.

ADDRESSES: These plats will be available for inspection in the Arizona State Office, Bureau of Land Management, One North Central Avenue, Suite 800, Phoenix, Arizona 85004–4427. Protests of the survey should be sent to the Arizona State Director at the above address.

FOR FURTHER INFORMATION CONTACT: Geoffrey A. Graham, Chief Cadastral Surveyor of Arizona; (602) 417–9558; *ggraham@blm.gov*. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION:

The Gila and Salt River Meridian, Arizona

The plat, in two sheets, representing the dependent resurvey of a portion of the subdivisional lines, Township 19 North, Range 26 East, accepted January 14, 2020, for Group 1192, Arizona.

This plat was prepared at the request of the United States National Park Service.

The plat, in one sheet, representing the amended metes-and-bounds survey in the northeast quarter of section 20, Township 8 South, Range 17 East, accepted January 14, 2020, for Group 1179, Arizona.

This plat was prepared at the request of the Bureau of Land Management.

The plat, in one sheet, representing the dependent resurvey of portions of the east and north boundaries, portions of the subdivisional lines, and the subdivision of section 2, Township 2 South, Range 6 West, accepted January 14, 2020, for Group 1197, Arizona.

This plat was prepared at the request of the Bureau of Land Management, Lower Sonoran Field Office.

A person or party who wishes to protest against any of these surveys must file a written notice of protest within 30 calendar days from the date of this publication with the Arizona State Director, Bureau of Land Management, stating that they wish to protest.

A statement of reasons for a protest may be filed with the notice of protest to the State Director, or the statement of reasons must be filed with the State Director within 30 days after the protest is filed. Before including your address, or other personal information in your protest, please be aware that your entire protest, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Authority: 43 U.S.C. Chap. 3.

Geoffrey A. Graham,

Chief Cadastral Surveyor of Arizona.

[FR Doc. 2020–00901 Filed 1–17–20; 8:45 am]

BILLING CODE 4310–32–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLNVW00000.L7122000.EX0000. LVTFF1906890.19X.MO#4500141833]

Notice of Intent To Prepare a Draft Environmental Impact Statement and Resource Management Plan Amendment, for the Lithium Nevada Corp., Thacker Pass Project Proposed Plan of Operations and Reclamation Plan Permit Application, Humboldt County, Nevada

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: 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 Bureau of Land Management (BLM) Humboldt

River Field Office, Winnemucca, Nevada intends to prepare an Environmental Impact Statement (EIS), and Land Use Plan Amendment to the current Resource Management Plan (RMP), to analyze the potential impacts of approving the Lithium Nevada Corp. (LNC), Thacker Pass Project Proposed Plan of Operations and Reclamation Plan Permit Application (Project) in Humboldt County, Nevada. This notice announces the beginning of the scoping process to solicit public comments and identify issues to be considered in the EIS, and serves to initiate public consultation, as required under the National Historic Preservation Act (NHPA).

DATES: This notice initiates the public scoping process for the EIS. Comments on issues to be considered in the EIS may be submitted in writing until February 20, 2020. The dates and locations of two scoping meetings, one in Orovada and the other in Winnemucca, Nevada, will be announced at least 15 days in advance through local media, newspapers and the BLM website at: *https://www.blm.gov/office/winnemucca-district-office.* In order to be included in the Draft EIS, all comments must be received prior to the close of the 30-day scoping period or 15 days after the last public meeting, whichever is later. We will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments related to the Project by any of the following methods:

- *Website: https://bit.ly/2S7rRRt.*
- *Email: wfoweb@blm.gov,* Include Thacker Pass Project EIS Comments in the subject line.
- *Fax:* (775) 623–1503.
- *Mail:* 5100 E Winnemucca Boulevard, Winnemucca, NV 89445.

FOR FURTHER INFORMATION CONTACT: For questions about the proposed Project contact Mr. Ken Loda, telephone: (775) 623–1500, address: 5100 East Winnemucca Boulevard, Winnemucca, NV 89445. Contact Mr. Loda to have your name added to our mailing list. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The applicant, LNC, proposes to construct, operate, reclaim, and eventually close an open pit lithium mine, processing operation, and continued exploration activities (the Project) on public lands in northern Humboldt County, Nevada.

LNC has submitted two Plans of Operations (PoO), each of which includes an associated reclamation plan, to develop the Project and to provide BLM with a description of the proposed lithium mining, processing, and exploration operations. The PoOs include measures to be implemented to prevent unnecessary or undue degradation of public lands by operations authorized under the mining laws.

LNC currently has two approved PoOs, one for exploration and one for a specialty clay mine, approved within the area proposed for the new lithium mine. There are 75 acres of exploration disturbance approved under LNCs existing exploration PoO, and 140 acres of existing disturbance approved under their clay mine PoO. The operations proposed under the two new PoOs would involve a project area of about 18,000 acres, with an ultimate disturbance footprint of approximately 5,700 acres. The proposed lithium mine PoO boundary overlaps the existing PoO boundaries.

LNC proposes to develop the Project in two phases (Phase 1 and Phase 2) over the estimated 41-year mine life. Pending LNC receiving the required authorizations and permits for Phase 1 of the Project, pre-stripping would commence in early 2021 and construction in the first quarter of 2021, with mining production and ore processing estimated to commence in late 2022. LNC estimates that it would complete mining, processing and concurrent reclamation activities in 2061, after which reclamation, site closure activities, and post-closure monitoring would occur for a minimum of five years.

The Project would provide employment to approximately 300 workers during the operational phase. The proposed activities and facilities associated with the Project include development of an open pit mine, construction and operation of lithium processing and production facilities, mine facilities to support mining operations, two waste rock storage facilities, a run-of-mine stockpile, a clay tailings filter stack, water supply facilities, two power transmission lines and substations, and various ancillary facilities. Pit dewatering is not expected to be required as part of the Project until 2055, and concurrent backfill of the open pit would occur after sufficient volume has been excavated to initiate direct placement of waste rock. Continued exploration would be conducted under both PoOs. The project would produce lithium carbonate, lithium hydroxide monohydrate, lithium sulfide, lithium metal, and solid-state lithium batteries.

The Project also would include the construction of natural landforms and other design features to mitigate potential impacts to visual resources within the Project area. A Land Use Plan Amendment addressing visual resources would be included with the Project and analyzed in the EIS if visual resource issues cannot be mitigated during the exploration, construction, and operation of the Project to conform with the visual resource management class-2 designation in the current RMP, approved in 2015.

The purpose of the public scoping process is to identify relevant issues that will influence the scope of the environmental analysis, including alternatives, and guide the process for developing the EIS. The BLM has identified some preliminary issues associated with the Project: (a) Dewatering during mining and the formation of a pit lake after completion of mining activities; (b) Potential impacts to streams occupied by Lahontan cutthroat trout, a threatened species under the Endangered Species Act of 1973, as amended; (c) Potential impacts to visual resources; (d) Potential impacts to wildlife habitat; and (e) Potential impacts to cultural resources eligible under the National Register of Historic Places.

The BLM will use and coordinate the NEPA scoping process to help fulfill the public involvement process under the NHPA as provided in 42 CFR 800.2(d)(3). The information about historic and cultural resources within the area potentially affected by the proposed project will assist the BLM in identifying and evaluating impacts to such resources in the context of both NEPA and the NHPA.

The BLM will consult with Native American tribes on a government-to-government basis in accordance with Executive Order 13175 and other policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration.

Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed project that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the EIS as a cooperating agency. Comments and materials we receive, as well as

supporting documentation we use in preparing the EIS, will be available for public inspection during normal business hours at the Winnemucca District Office (see **ADDRESSES** section, above).

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may request in your comment that your personal identifying information be withheld from public review, we cannot guarantee that we will be able to do so.

Authority: 40 CFR 1501.7.

David Kampwerth,

Field Manager, Humboldt River Field Office.

[FR Doc. 2020–00851 Filed 1–17–20; 8:45 am]

BILLING CODE 4310–HC–P

DEPARTMENT OF THE INTERIOR

National Park Service

[NPS–NER–ACAD–28995; PPNEACADSO, PPMPSPDIZ.YM0000]

Acadia National Park Advisory Commission Notice of Public Meetings

AGENCY: National Park Service, Interior.

ACTION: Meeting notice.

SUMMARY: In accordance with the Federal Advisory Committee Act of 1972, the National Park Service (NPS) is hereby giving notice that the Acadia National Park Advisory Commission (Commission) will meet as indicated below.

DATES: The Commission will meet: Monday, February 3, 2020; and Monday, June 1, 2020. All scheduled meetings will begin at 1:00 p.m. and will end by 4:00 p.m. (Eastern).

ADDRESSES: The February 3, 2020, and June 1, 2020, meetings will be held at the headquarters conference room, Acadia National Park, 20 McFarland Hill Drive, Bar Harbor, Maine 04609.

FOR FURTHER INFORMATION CONTACT: Michael Madell, Deputy Superintendent, Acadia National Park, P.O. Box 177, Bar Harbor, Maine 04609, telephone (207) 288–8701 or email *michael_madell@nps.gov.*

SUPPLEMENTARY INFORMATION: The Commission was established by section 103 of Public Law 99–420, as amended, (16 U.S.C. 341 note), and in accordance with the Federal Advisory Committee Act (5 U.S.C. Appendix 1–16). The Commission advises the Secretary and the NPS on matters relating to the management and development of Acadia National Park, including but not limited to, the acquisition of lands and interests in lands (including conservation easements on islands) and the termination of rights of use and occupancy.

The meeting is open to the public. Interested persons may choose to make a public comment at the meeting during the designated time for this purpose. Depending on the number of persons wishing to comment, the length of comments may be limited. Members of the public may also choose to submit written comments by sending them to Michael Madell (see **FOR FURTHER INFORMATION CONTACT**.)

The Commission meeting locations may change based on inclement weather or exceptional circumstances. If a meeting location is changed, the Superintendent will issue a press release and use local newspapers to announce the change.

Purpose of the Meeting: The Commission meeting will consist of the following proposed agenda items:

1. Committee Reports:
   - Land Conservation
   - Park Use
   - Science and Education
   - Historic
2. Old Business
3. Superintendent's Report
4. Chairman's Report
5. Public Comments
6. Adjournment

The final meeting agenda will be posted to the commission's website at: *https://www.nps.gov/acad/getinvolved/acadia-advisory-commission.htm.*

Public Disclosure of Information: Before including your address, phone number, email address, or other personal identifying information in your comments, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

(Authority: 5 U.S.C. Appendix 2)

Alma Ripps,

Chief, Office of Policy.

[FR Doc. 2020–00791 Filed 1–17–20; 8:45 am]

BILLING CODE 4312–52–P

DEPARTMENT OF THE INTERIOR

National Park Service

[NPS–WASO–NRNHL–DTS#-29558; PPWOCRADI0, PCU00RP14.R50000]

National Register of Historic Places; Notification of Pending Nominations and Related Actions

AGENCY: National Park Service, Interior.

ACTION: Notice.

SUMMARY: The National Park Service is soliciting comments on the significance of properties nominated before December 21, 2019, for listing or related actions in the National Register of Historic Places.

DATES: Comments should be submitted by February 5, 2020.

ADDRESSES: Comments may be sent via U.S. Postal Service and all other carriers to the National Register of Historic Places, National Park Service, 1849 C St. NW, MS 7228, Washington, DC 20240.

SUPPLEMENTARY INFORMATION: The properties listed in this notice are being considered for listing or related actions in the National Register of Historic Places. Nominations for their consideration were received by the National Park Service before December 21, 2019. Pursuant to Section 60.13 of 36 CFR part 60, written comments are being accepted concerning the significance of the nominated properties under the National Register criteria for evaluation.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Nominations submitted by State or Tribal Historic Preservation Officers:

ARKANSAS

Monroe County

Williamson, Ellis and Charlotte, House, 126 West Cloverdale Dr., Brinkley, SG100004944

Washington County

Williams, John G., House #2, 140 North Sang Ave., Fayetteville, SG100004942

Clark, Joe Marsh and Maxine, House (Arkansas Designs of E. Fay Jones MPS), 1724 Rockwood Trail, Fayetteville, MP100004945

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Winnemucca District Office
Humboldt River Field Office
5100 East Winnemucca Boulevard
Winnemucca, Nevada 89445
Phone: (775) 623-1500 Fax: (775) 623-1740
Email: wfoweb@blm.gov
https://www.blm.gov/office/winnemucca-district-office

In Reply Refer To:
NVN-098582
NVN-098586
DOI-BLM-NV-W010-2020-0012-EIS
3809/1793 (NV-010.04)

Dear Interested Public:

The Bureau of Land Management (BLM), Winnemucca District, Humboldt River Field Office is seeking public input as it initiates an Environmental Impact Statement to analyze the *Thacker Pass Plan of Operations and Reclamation Plan* (BLM Casefile NVN-098586) and the *Thacker North-South Exploration Plan of Operations and Reclamation Plan* (NVN-098582) submitted by Lithium Nevada Corp. (LNC), a wholly owned subsidiary of Lithium Americas Corp., and collectively referred to as the proposed Thacker Pass Lithium Mine Project (project). An amendment to the *Winnemucca District Resource Management Plan* (approved May 15, 2015) for Visual Resource Management classification standards may also be considered by BLM under the NEPA analysis for the proposed project.

The proposed project consists of an open pit lithium mine, processing facilities, and continued exploration of adjacent lands located in northern Humboldt County, Nevada, approximately 17 miles northwest of Orovada, 53 miles north-northwest of Winnemucca, and 20 miles south of the Oregon state border. The proposed project will have a life expectancy of approximately 41 years, and includes the following:

- Development of an open pit mine to recover approximately 230.0 million cubic yards (M CY) of ore. Pit dewatering is not expected to be required as part of the Project until 2055;
- Concurrent backfill of the open pit using approximately 144.3 M CY of waste rock and 75.2 M CY of coarse gangue material;
- Construction of two Waste Rock Storage Facilities (WRSFs) to accommodate permanent storage of approximately 45.9 M CY of excavated mine waste rock material;
- Construction and operation of mine facilities to support mining operations;
- Construction of a 494 thousand cubic yard Run-of-Mine (ROM) stockpile;
- Construction and operation of an attrition scrubbing process to separate the lithium-rich fine clay from the coarse low-grade material (coarse gangue);
- Construction of a coarse gangue stockpile designed with a storage capacity of approximately 48.4 M CY;
- Construction and operation of lithium processing facilities designed to produce lithium carbonate, lithium hydroxide monohydrate, lithium sulfide, lithium metal, and solid-state lithium batteries;
- Construction of a sulfuric acid plant that will generate sulfuric acid for use in a leaching process and will also generate steam for energy that will provide power to support the Project;

- Construction and operation of a Clay Tailings Filter Stack (CTFS) to permanently store clay tailings, neutralization solids, and various salts generated during lithium processing.
- Construction and maintenance of haul and secondary roads;
- Construction and maintenance of stormwater management infrastructures including diversions and sediment ponds;
- Construction of three growth media stockpiles with material salvaged within the footprint of proposed disturbances;
- Construction of raw water supply facilities including two supply wells, two booster pump stations, a water pump tank station, and underground water pipeline to the process plant;
- Construction of a seven mile 25-kilovolt (kV) power transmission line from a new substation installed in the process plant area to the raw water supply facilities to the east, and a two-mile power transmission line to the new mine area substations to the west;
- Continued exploration with up to 150 acres of exploration-related disturbance over the life of the mine. Exploration activities would include surface sampling, trenching, bulk sampling, and drilling. Exploration activities may also include geotechnical investigations, geophysical surveys, water exploration, and monitoring well installation, as necessary during the life of the Project.

The public is invited to submit comments in writing on the proposed project and to attend one of the two public open-house meetings. The BLM will hold public meetings from 5 to 7 p.m. on Wednesday, February 5, 2020, at the Winnemucca Convention Center, located at 50 West Winnemucca Boulevard, Suite 1, Winnemucca, Nevada, and on Thursday, February 6, 2020, at the Orovada Community Center, located at East Kings River Highway, Orovada, Nevada. A project introduction and a slide presentation will be given at the beginning of each meeting, followed by open-house topical discussions.

Your participation is encouraged, and comment forms will be available for your input at these meetings. Comments or comment forms may be submitted at the public meetings; on-line through the BLM ePlanning website; by email at wfoweb@blm.gov with “Thacker Pass EIS (Loda)” in the subject line; or by mail to Mr. Ken Loda, project lead, at the above address. Comments must be received by February 20, 2020. This letter and additional information, including project maps, are available through the links available on our ePlanning webpage at https://bit.ly/2S7rRRt .

Public comments submitted for this project, including names and addresses of commenters will be available for public review at the Winnemucca District Office during regular business hours 7:30 a.m. to 4:30 p.m., Monday through Friday, except federal holidays. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold personal identifying information from public review, we cannot guarantee that we will be able to do so.

If you have any questions, please contact Mr. Ken Loda (775) 632-1539 or at the address above.

Sincerely,

/s/ Kathleen Rehberg acting for

David Kampwerth
Field Manager
Humboldt River Field Office

Appendix B

Scoping Meeting Materials

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U.S. Department of the Interior
Bureau of Land Management

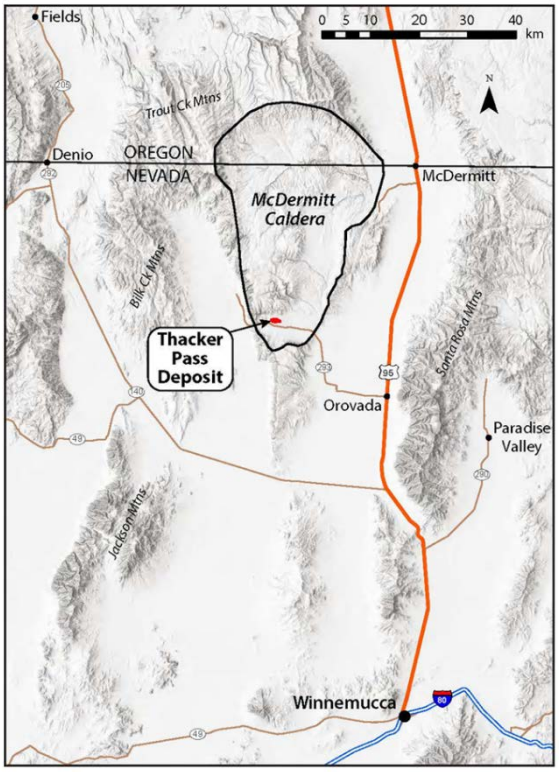
Proposed Thacker Pass Lithium Project

Fact Sheet - Bureau of Land Management, Humboldt River Field Office, Nevada

Proposed Thacker Pass Project

Lithium Nevada Corp. (LNC), a wholly owned subsidiary of Lithium Americas Corp., has submitted two separate Plans of Operations (PoO) to the Bureau of Land Management (BLM), Humboldt River Field Office (HRFO) for consideration under 43 CFR 3809 regulations. The Thacker Pass Mine and Reclamation PoO (Mine Plan) and Thacker Pass North and South Exploration PoO (Exploration Plan) are collectively referred to as the proposed Project and will be analyzed as a single action by the BLM. The BLM has determined that an Environmental Impact Statement (EIS) will be required and is serving as the lead agency for the preparation of the EIS in compliance with the National Environmental Policy Act of 1969 (NEPA) and other applicable guidance. Under the proposed Project, LNC would construct, operate, reclaim, and close an open pit lithium mining and processing operation within the Mine Plan boundary and continue mineral exploration within the Exploration Plan boundary.

Figure 1. Project Location

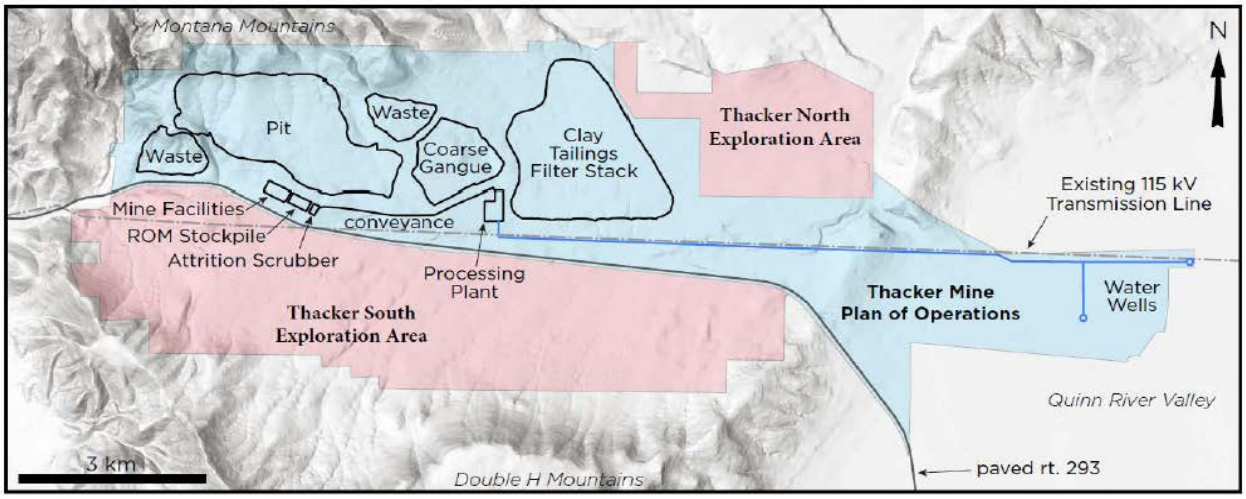


The proposed Project is located on public lands administered by the BLM HRFO located approximately 15 miles northwest of the Town of Orovada in Humboldt County, Nevada (**Figure 1**). The proposed Mine Plan boundary, shown in blue on **Figure 2** below, would encompass approximately 10,468 acres with an estimated disturbance footprint of approximately 5,545 acres. The proposed Exploration Plan boundary, shown in red on **Figure 2**, would encompass an additional 7,727 acres (1,609 acres North Exploration area and 6,118 acres South Exploration area). Proposed surface disturbance within the Exploration Plan boundary would include approximately 150 acres.

Mine Activities

The surface and subsurface mineral estates associated with the proposed Project are located solely on public lands administered by the BLM HRFO; no state or private lands are included in the proposed Project area. The proposed Project would be an open pit mine with a life expectancy of 42 years. LNC would develop the proposed Project in two phases over the estimated life-of-mine. Phase 1 would include Years 1-6 and would include the construction of the mine and associated processing and support facilities. Lithium ore would be processed initially processed onsite by LNC and various lithium-based products would be transported to regional distribution points via truck for shipping to lithium purchasers for further refinement. Phase 2 would include Years 7-42 and would include mine operation, lithium production and transport, concurrent reclamation of disturbed areas as mining progresses, and the closure and final reclamation of disturbance at the end of the 42-year mine life.

Figure 2. Proposed Mine Plan and Exploration Plan Boundaries and Proposed Facilities



Summary of Proposed Mining, Processing and Support Facilities

- Mining Method: Continuous Open Pit with surface miner, truck loaders, or excavators
- Ore Recovery: 230 million cubic yards (M CY)
- Concurrent Backfill: 144.3 M CY of waste rock and 75.2 M CY of coarse gangue
- Two Waste Rock Storage Facilities: 45.9 M CY
- Run-of-Mine Stockpile: 494 thousand CY
- Coarse Gangue Stockpile: 48.4 M CY
- Clay Tailings Filter Stack: 353.6 M CY
- Three growth media stockpiles with material salvaged from disturbance footprint
- Attrition Scrubber to separate lithium-rich clay from coarse gangue
- Sulfuric acid plant
- Lithium processing facilities
- Water Requirements:
  - Phase 1 - approximately 2,600-acre feet/year
  - Phase 2 - approximately 5,200-acre feet/year

Anticipated Job Creation

LNC anticipates Phase 1 would create approximately 183 permanent jobs related to mine operations and administration in addition to approximately 1,000 mine and facility construction jobs. Phase 2 is anticipated to create approximately 313 permanent jobs and 650 construction jobs.

Baseline Surveys

LNC has been conducting baseline information in the general area since 2011. Existing baseline surveys would be incorporated into the EIS and include the following:

- Cultural Resources
- Vegetation & Noxious Weeds
- Wildlife
- Raptors/Golden Eagle
- Greater Sage-Grouse
- Threatened, Endangered, and BLM sensitive species
- Spring Snails
- Seeps & Springs
- Wetlands
- Waters of the U.S. (Army Corps of Engineers)
- Surface & Groundwater
- Geochemistry
- Soils & Growth Media Assessment
- Visual Assessment
- Noise
- Socioeconomics
- Air Quality
- Greenhouse Gas Emissions

LithiumNevada

A LithiumAmericas Company

Thacker Pass Project

February 5 & 6, 2020

LithiumNevada
A LithiumAmericas Company

CAUTIONARY STATEMENT & DISCLAIMER

Technical Information
Scientific and technical information in this presentation about the Thacker Pass Project has been reviewed and approved by Rene LeBlanc, a qualified person under NI 43-101. Further information about the Thacker Pass Project (formerly Stage 1 of Lithium Nevada project), including a description of data verification and QA/QC programs, is available in the NI 43-101 technical report of Lithium Americas effective August 1, 2018 entitled "Technical Report on the Pre-Feasibility Study for the Thacker Pass Project, Humboldt County, Nevada, USA", available on SEDAR at www.sedar.com.

The Mineral Resource and Mineral Reserve estimates contained in this press release have been prepared in accordance with the requirements of the securities laws in effect in Canada, which differ from the requirements of United States securities laws and use terms that are not recognized by the United States Securities and Exchange Commission ("SEC"). Canadian reporting requirements for disclosure of mineral properties are governed by NI 43-101. U.S. reporting requirements are governed by the SEC Industry Guide 7 under the United States Securities Act of 1933, as amended. Accordingly, technical information set forth herein may not be comparable with information made public by companies that report in accordance with U.S. standards.

Forward-Looking Statements
This presentation contains "forward-looking information" within the meaning of applicable Canadian securities legislation, and "forward-looking statements" within the meaning of applicable United States securities legislation (collectively referred to as "forward-looking information"). All statements, other than statements of historical fact, are forward-looking information. Forward looking information can be identified by the use of statements that include words such as "anticipate", "plan", "continue", "estimate", "expect", "exceed", "may", "will", "project", "predict", "propose", "potential", "targeting", "exploring", "scheduled", "intend", "could", "might", "should", "believe" and similar words or expressions. Forward-looking information in this presentation includes, but is not limited to: successful development of the Thacker Pass project, including timing, production and operation forecasts, and results thereof; all financial estimates for the Thacker Pass project; forecasts for future lithium market demand and pricing; and statements related to the expected impact, results and benefits of the Thacker Pass project.

Forward-looking information involve known and unknown risks, assumptions and other factors that may cause actual results to differ materially. These forward-looking information reflect management's current views with respect to future events, and while considered reasonable by management at this time, there can be no certainty that they will accurately reflect actual results. Assumptions upon which such forward-looking information is based include, without limitation: long term pricing and demand growth for lithium products; Lithium Americas' (and that its subsidiaries) ability to fund, advance and develop the Thacker Pass project as currently forecast, including results therefrom; a stable and supportive legislative and regulatory environment for mining development; the impact of increasing competition; ability to operate in a safe and effective manner; and ability to obtain financing on reasonable terms or at all. Our actual results, programs and financial position could differ materially from those anticipated in such forward-looking information as a result of numerous factors, risks and uncertainties, many of which are beyond our control. These include, but are not limited to: inherent risks in development of capital intensive mineral projects; possible variations in mineral resource and reserve estimates; recovery rates; lithium prices; changes in project parameters as plans continue to be refined; changes in legislation or governmental policy; security of mineral property titles and permits; failure of plant, equipment or processes to operate as anticipated; accidents; acts of god or severe weather; labour disputes; environmental liabilities; cost overruns or unanticipated costs and expenses; the availability of funds; and general market and industry conditions.

The foregoing list of risks, assumptions and uncertainties is not exhaustive. Additional information on these and other factors can be found in Lithium Americas' annual information form and most recently filed management discussion & analysis available on SEDAR and their equivalents on EDGAR. There can be no assurance that forward-looking information will prove to be accurate, as actual results and future events could differ materially from those anticipated in such information. Accordingly, readers are cautioned not to place undue reliance on forward-looking information. We do not intend, and expressly disclaims any obligation to, update any forward-looking information whether as a result of new information, future events or otherwise, except as, and to the extent required by, applicable securities laws.

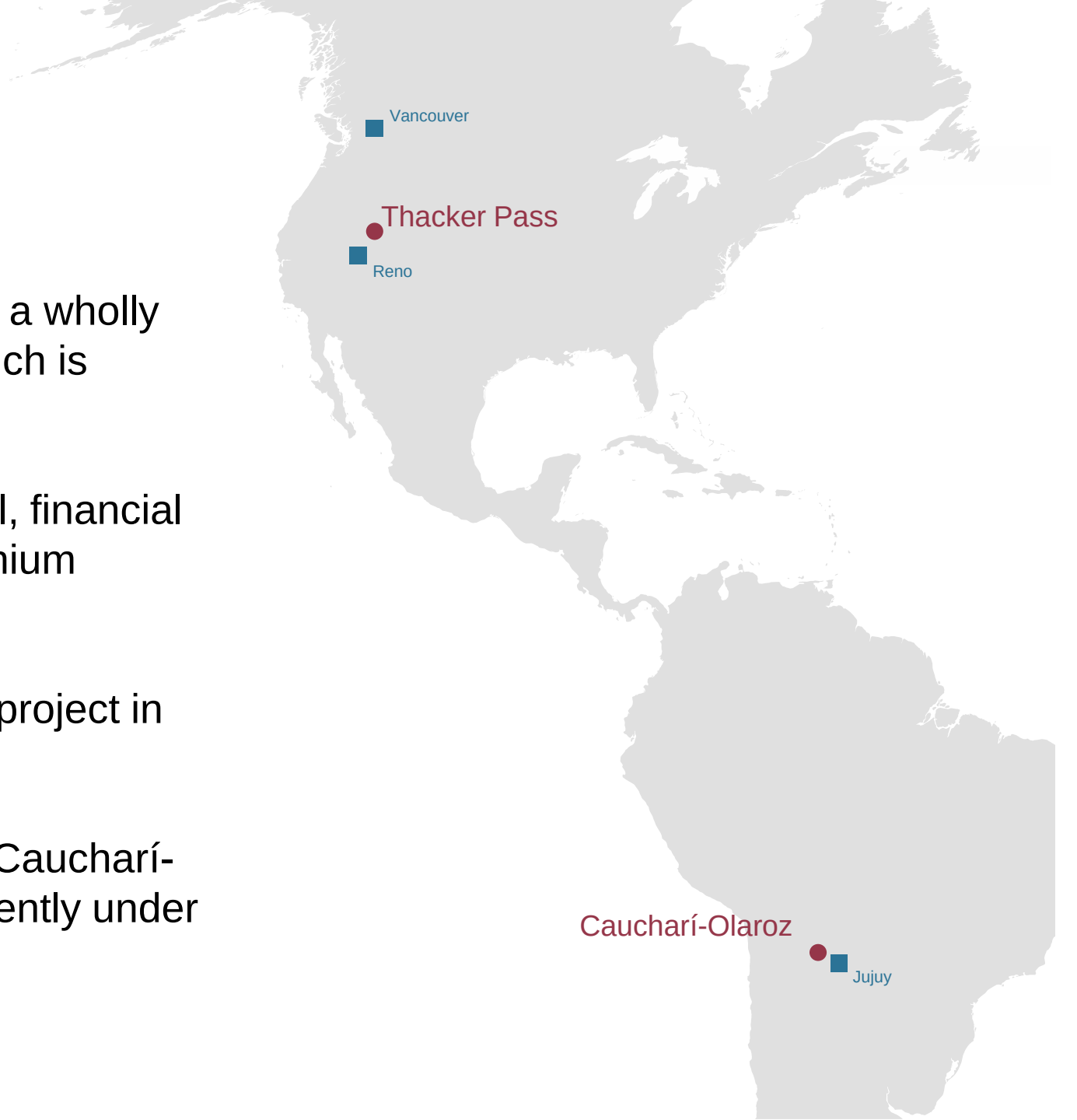
Forward Looking Financial Information
Certain information provided in this presentation constitutes forward-looking financial information within the meaning of applicable securities laws. Management has provided this information as of the date of this document in order to assist readers to better understand the expected results and impact of our operations. Readers are cautioned that this information may not be appropriate for any other purpose, including investment purposes, and consequently should not place undue reliance on this information. Readers are further cautioned to review the full description of risks, uncertainties and management's assumptions in Lithium Americas' most recent and annual Management's Discussion and Analysis available on SEDAR at www.sedar.com. Forward-looking financial information also constitute forward-looking information within the context of applicable securities laws and as such, is subject to the same risks, uncertainties and assumptions as are set out in the cautionary note above.

Disclaimer
Information provided in this presentation is necessarily summarized and may not contain all available material information, accordingly, readers are cautioned to review Lithium Americas' public disclosure record in full. Lithium Americas expressly disclaims any responsibility for readers reliance on this presentation. This presentation is provided for informational purposes only, and shall not form the basis of any commitment or offering. Any such commitment or offering will only be made by binding written agreement containing customary terms for transactions of such nature, and only then in compliance with applicable laws, including securities laws of Canada and the United States. This presentation is property of Lithium Americas Corp.

All figures in US Dollars unless otherwise noted.

About Lithium Americas Corp.

- Merged with Western Lithium in 2016.
- Established Lithium Nevada Corp. (LNC) - a wholly owned subsidiary of Lithium Americas, which is headquartered in Reno.
- Assembled team with the leading technical, financial and project execution experience in the lithium industry.
- Developing the Thacker Pass lithium-clay project in northern Nevada since 2008.
- Lithium Americas is jointly developing the Caucharí-Olaroz Lithium Brine Project, which is currently under construction.



PROJECT PURPOSE AND NEED

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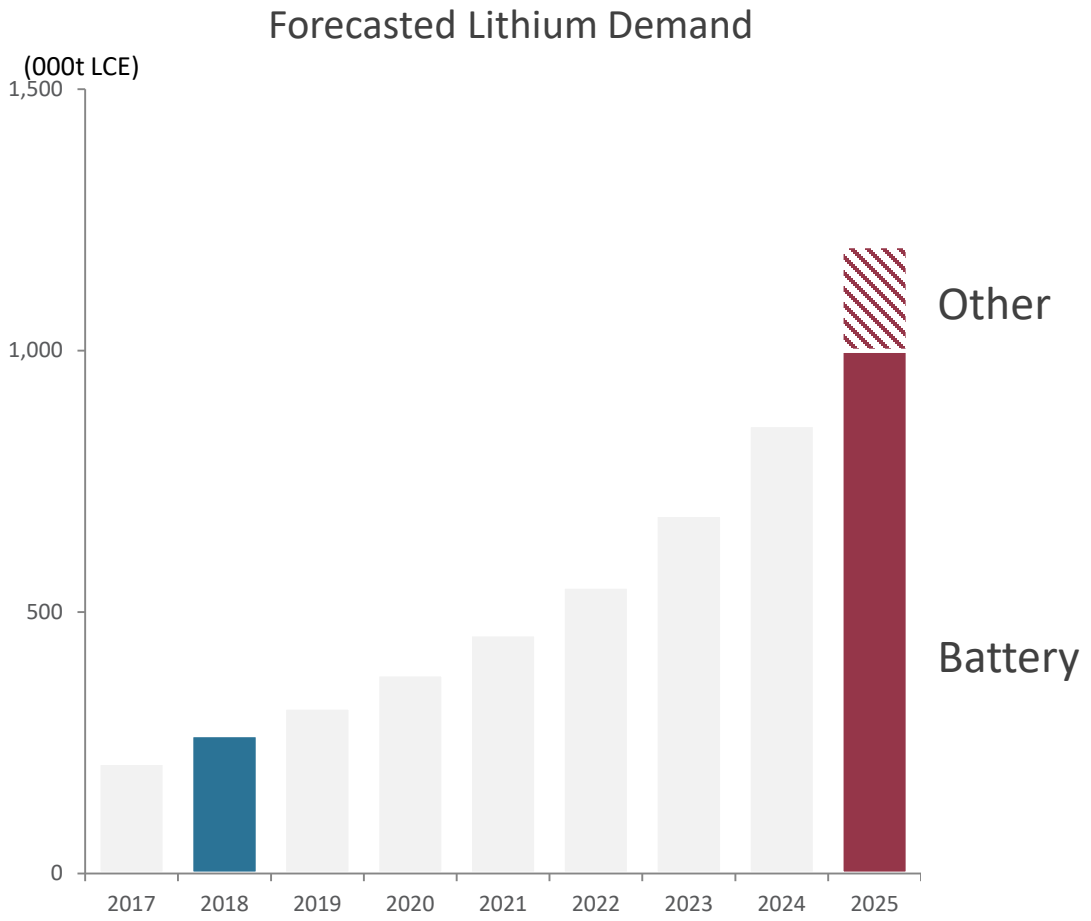
- The **Purpose** of the Federal Action is to grant LNC authorization to construct and operate a lithium mine and lithium processing plant on public lands.
- There is a **Need** to satisfy the nation's growing demand for lithium, a critical mineral for US economic security and defense. Most lithium used in the US is processed in China.
- A **domestic supply** of lithium is important for a more reliable, efficient and cost-effective lithium battery supply chain in the US.



Lithium Nevada's Thacker Pass Project

- Thacker Pass is 100% owned by LNC
- World Class Lithium Deposit, largest in the U.S.
- 41-year mine life, open pit lithium mine
- New, sustainable, innovative process
- Generating carbon free energy on-site, to be used in the process
- Goal to be a carbon neutral lithium mining & process operation
- Developing Project in two phases (Phase 1 & 2)
- 33,000 - 66,000 tpy LCE, anticipated to meet most or all of U.S. lithium demand
- Producing a variety of battery-grade lithium chemicals
- Construction 2021-2022
- Mining, Operation & Production late 2022-2065

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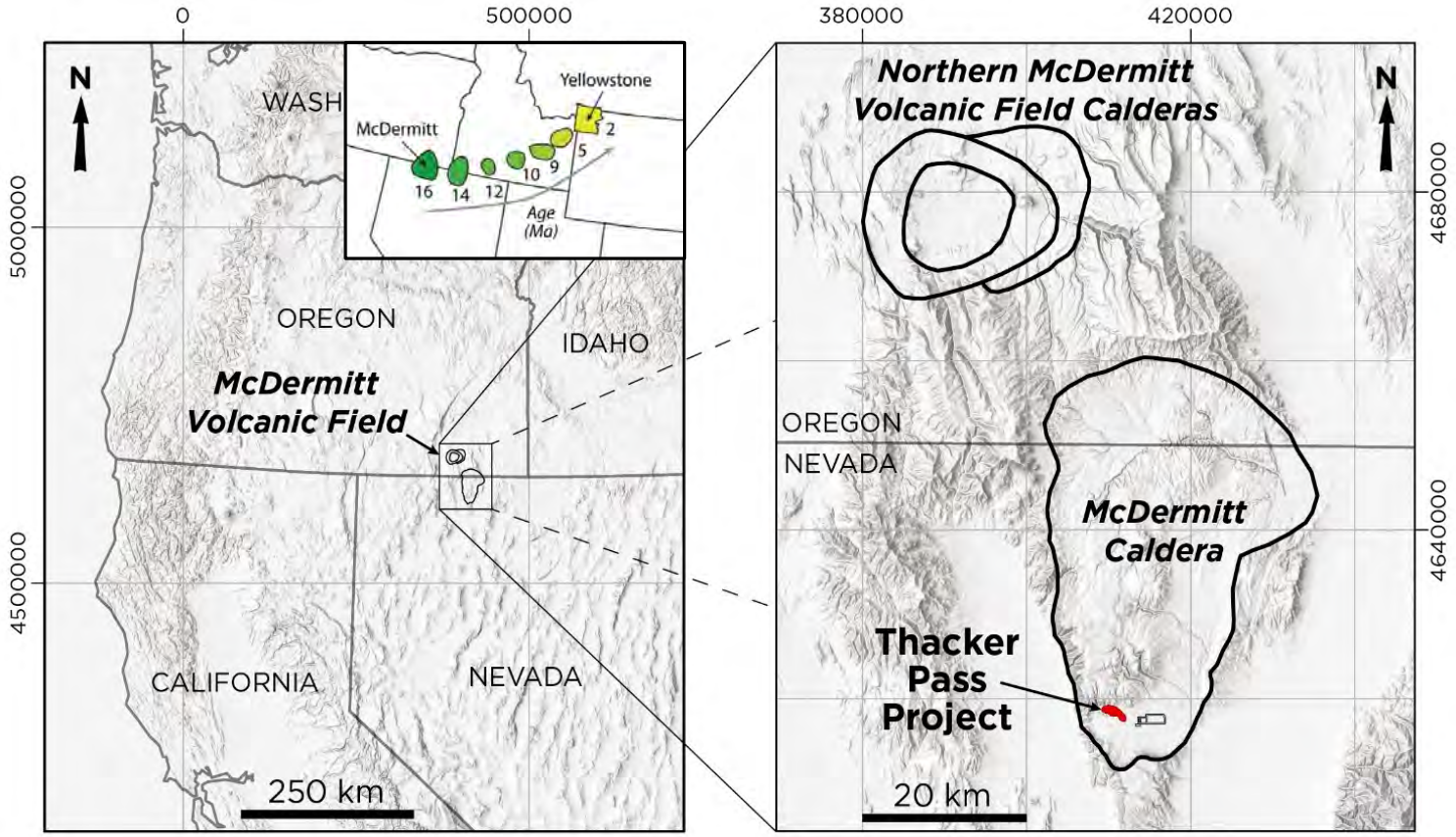
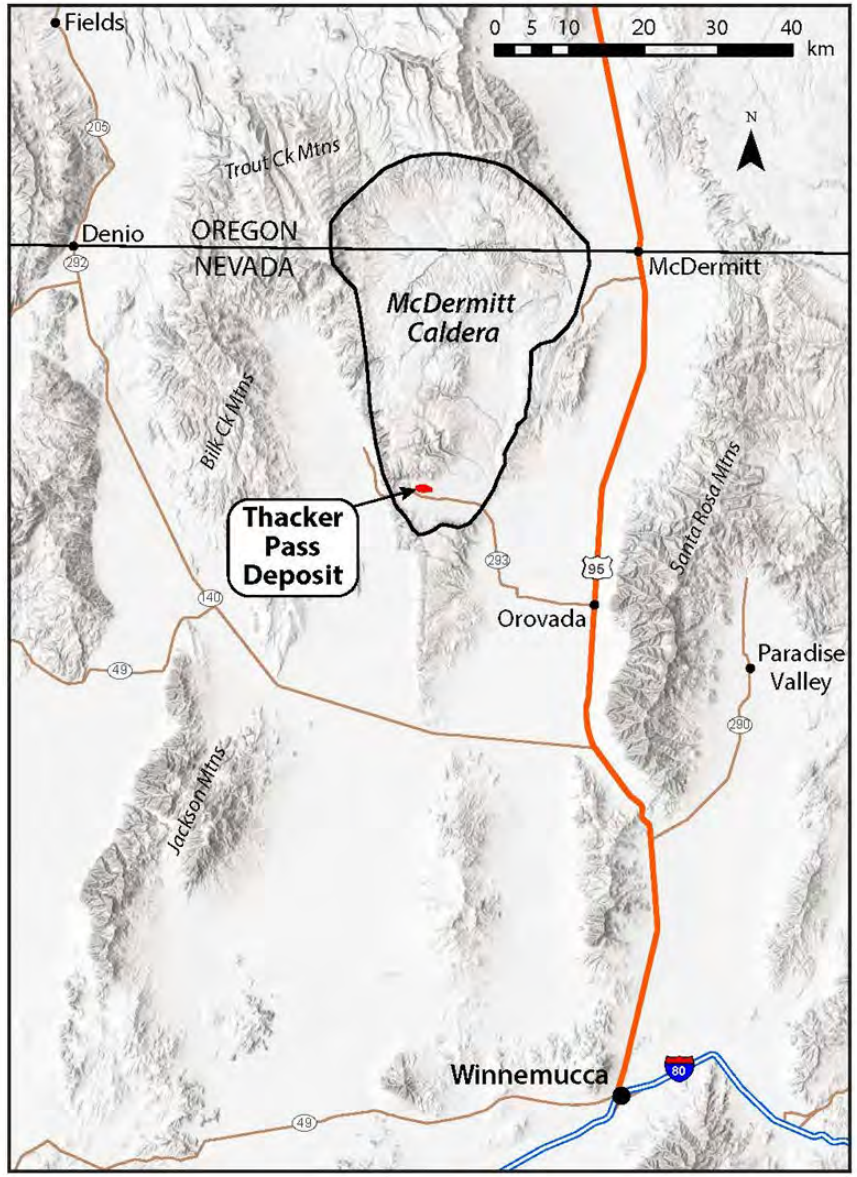
Largest Known Lithium Deposit in the U.S.





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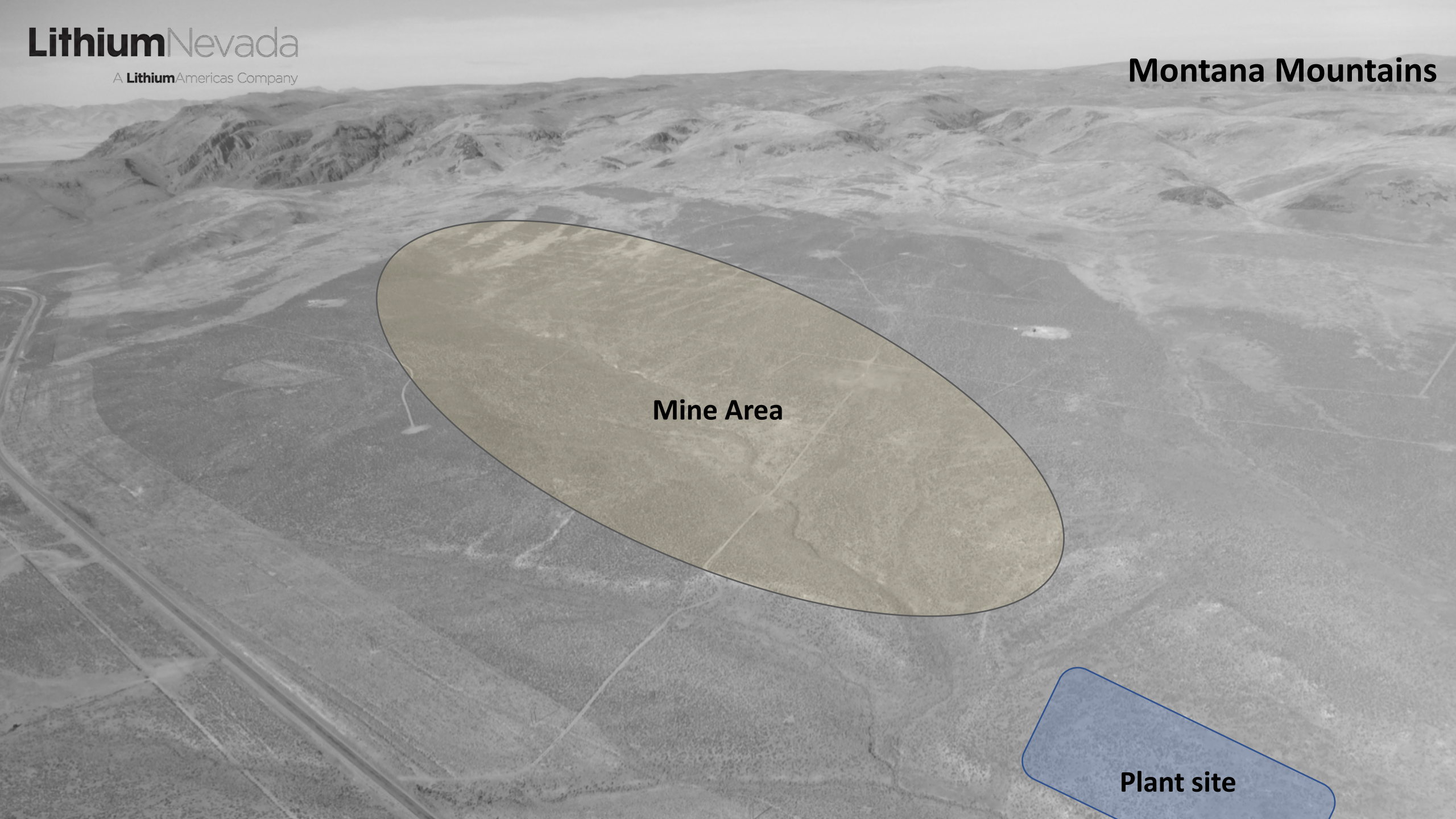

PRINCIPAL FACILITIES AND RECLAMATION

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OPEN PIT

Recover 230 M CY of ore

Concurrent pit backfill using waste rock and coarse gangue material

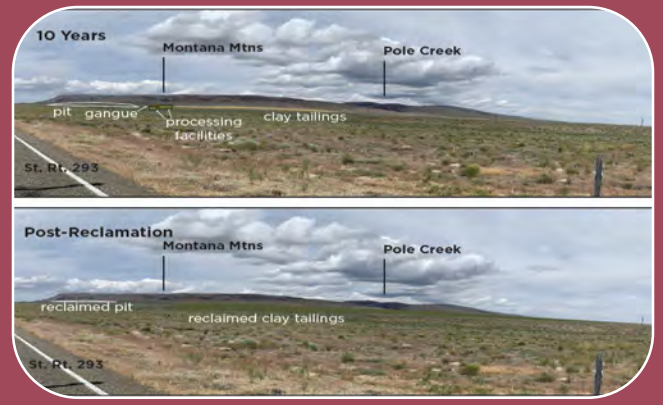
STOCKPILES

Two WRSFs: 45.9 MC Y; West 3:1 Slope, East 4:1 Slope

One Coarse Gangue Stockpile: 48.4 M CY; 4:1 Slope

One Clay Tailing Storage Facility: 353.6 M CY; 4:1 Slope

Concurrent reclamation of all stockpiles when feasible



VISUAL RESOURCES/RECLAMATION

Paint colors will be strategically chosen to blend with landscape

OPEN PIT

Concurrently backfilled and reclaimed

STOCKPILES

Sloped and graded to blend with current topography

Concurrently reclaimed to mitigate long term visual impacts

Coated reclamation seed mix developed in conjunction with UNR

PROCESSING FACILITY

Sulfuric Acid Plant: providing acid for the process plant and also generating steam to power the project facilities

Lithium Hydroxide Facility

Lithium Carbonate Facility

Using Best Available Control Technology

Low CO_2 Emissions

Facilities will have primary and secondary containment

Spill Management and Emergency Management Plans developed

Sound buffering and acoustic insulation to minimize noise

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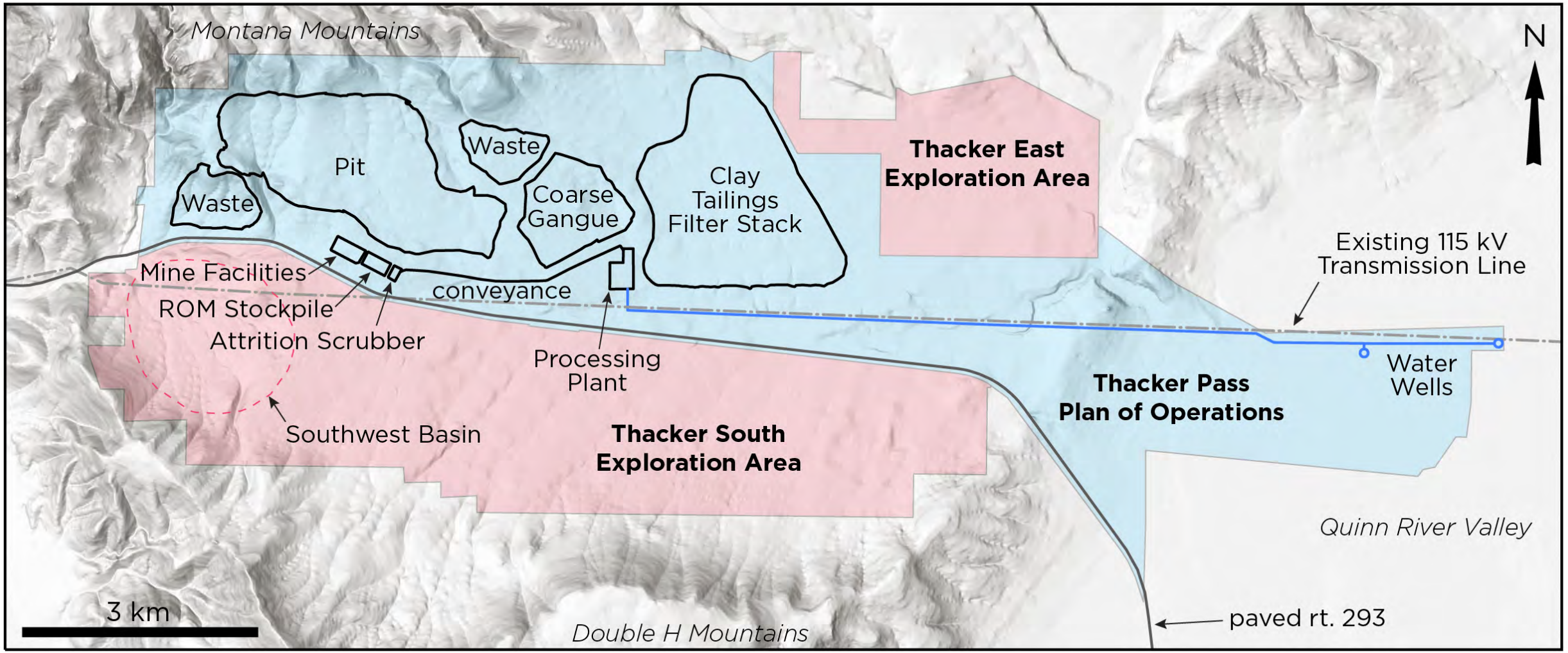
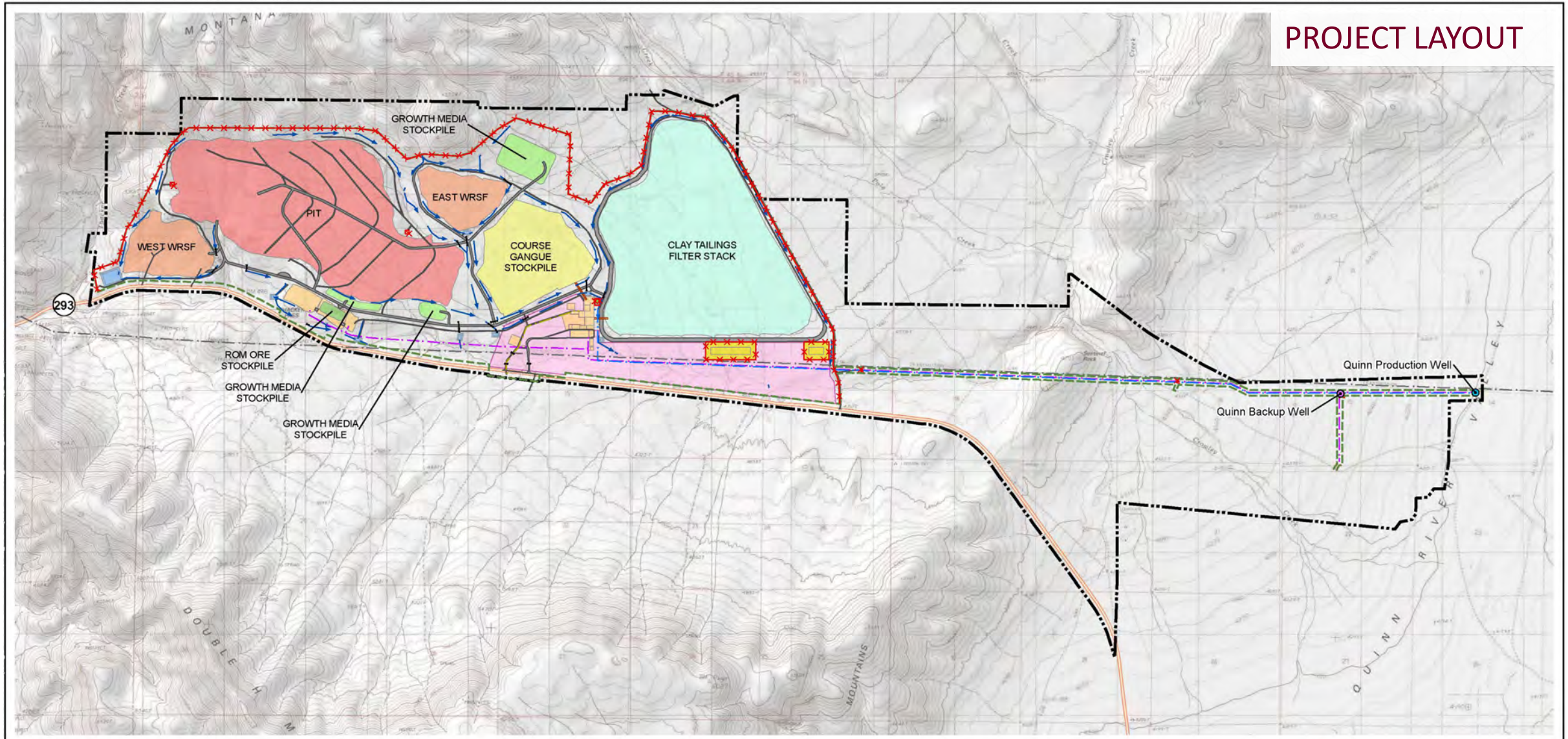
Thacker Pass Project Plan of Operations

Thacker North and South Exploration Project Plan of Operations



PROJECT LAYOUT



Legend

- Roads
- Existing Powerline
- Fence
- Power Line
- Water Line
- Fiber Optic Line
- Culvert
- Future Plant Expansion Area
- Stormwater Diversion Channel
- PoO Boundary
- Disturbance Area Boundary
- Conveyor Corridor
- Existing Water Well
- Proposed Water Well
- Clay Tailings Filter Stack
- Course Gangue Stockpile
- Growth Media Stockpile
- Mine Facilities
- Pit
- Run of Mine (ROM) Ore Stockpile
- Waste Rock Storage Facility
- Emergency Pond
- Reclaim Pond
- Sediment Pond

Source: Lithium Nevada 2019

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ENVIRONMENTAL STUDIES AND EVALUATIONS

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9 Years Collecting Environmental, Land and Cultural Data → **18,600 Acres surveyed for baseline environmental surveys** → **Over $6 million spent on Studies and Modeling** → **Project Consolidated in Thacker Pass, away from Montana Mountains**

WATER

Hydrogeology Baseline Report

Aquatic Resource Delineation Report

Water Quantity Impacts Assessment

Water Quality Impacts Assessment

Baseline Geochemistry Report

WILDLIFE

Wildlife Impact Assessment

Bird & Bat Survey

Eagle Conservation Plan

Est. Great Basin Sagebrush Restoration Fund at UNR

NV Sagebrush Ecosystem Technical Team Coordination

COMMUNITY & CULTURE

Cultural Inventory

Cultural Technical Report

Cultural Treatment Plan

Socioeconomic Assessment

Project Engagement Agreement with Fort McDermitt Tribe

AIR

Greenhouse Gas Emissions Report

Air Emission Inventory

Air Dispersion Model

Dust Management Plan

Volunteering to use Best Available Control Technologies

Class II Permit

LAND USE/RECLAMATION

Soil & Growth Media Assessment

Reclamation & Closure Plan

Tailings Technical Stability Report

Pit Wall Geotechnical Report

Vegetation & Weed Report

PIT DEVELOPMENT

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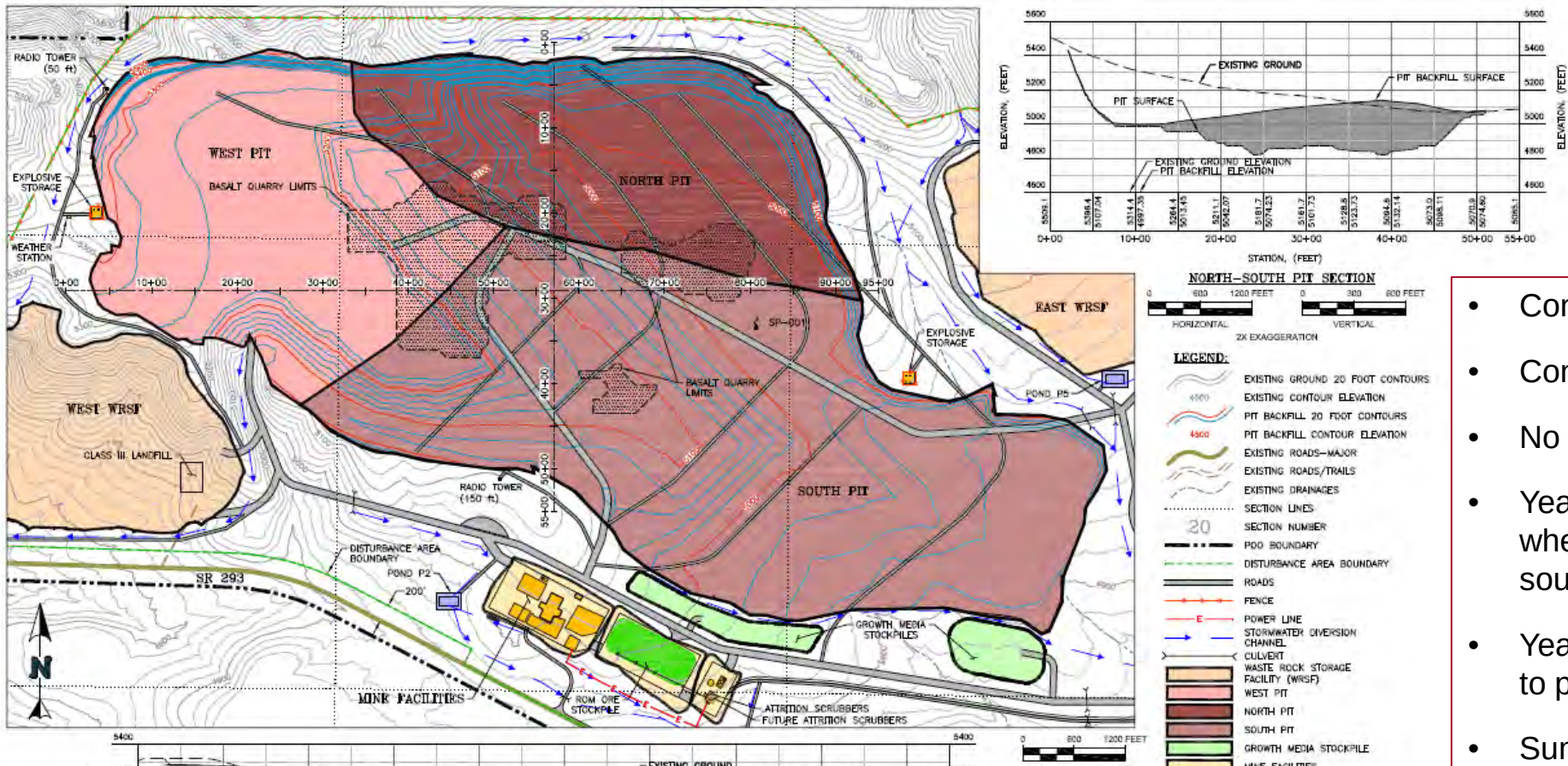

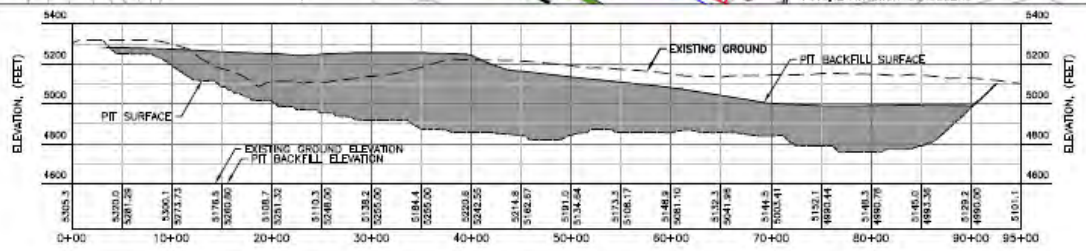

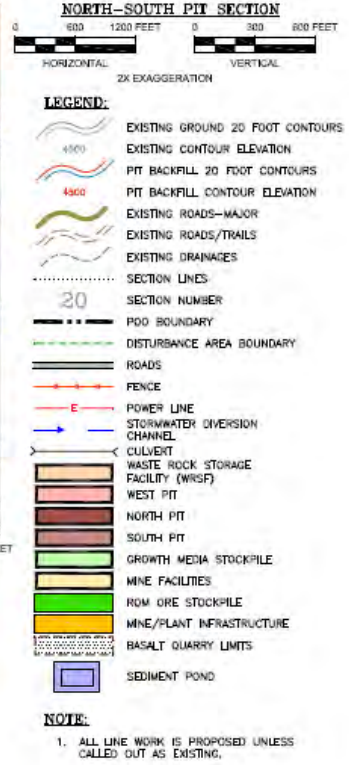

- Concurrent Pit Backfill (west to east)
- Concurrent Pit Reclamation
- No formation of a pit lake
- Year 2055 ~ minor in-pit seepage, when mining advances into the southeast, est. 10 gpm
- Year 2065 ~ maximum in-pit seepage to peak at est. 190 gpm (anticipated)
- Sump pumps will be used to dewater and directly fill water trucks for dust suppression
- No storage tanks or dewatering wells will be needed to support dewatering

GENERAL PROCESS FACILITY LAYOUT

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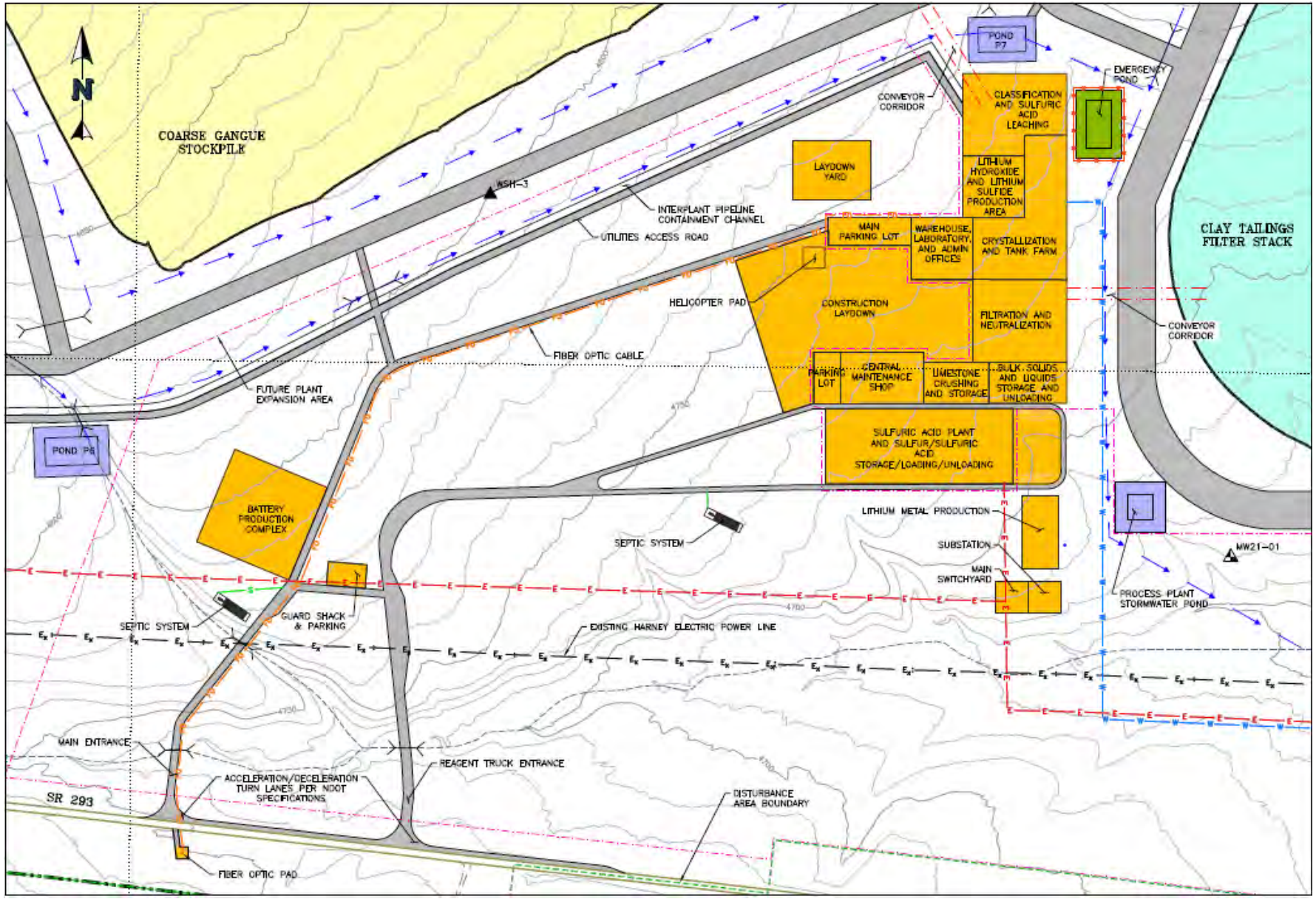

- Lithium Carbonate
- Lithium Hydroxide
- Lithium Sulfide
- Lithium Metal Production
- Battery Production

THACKER PASS PROCESSING

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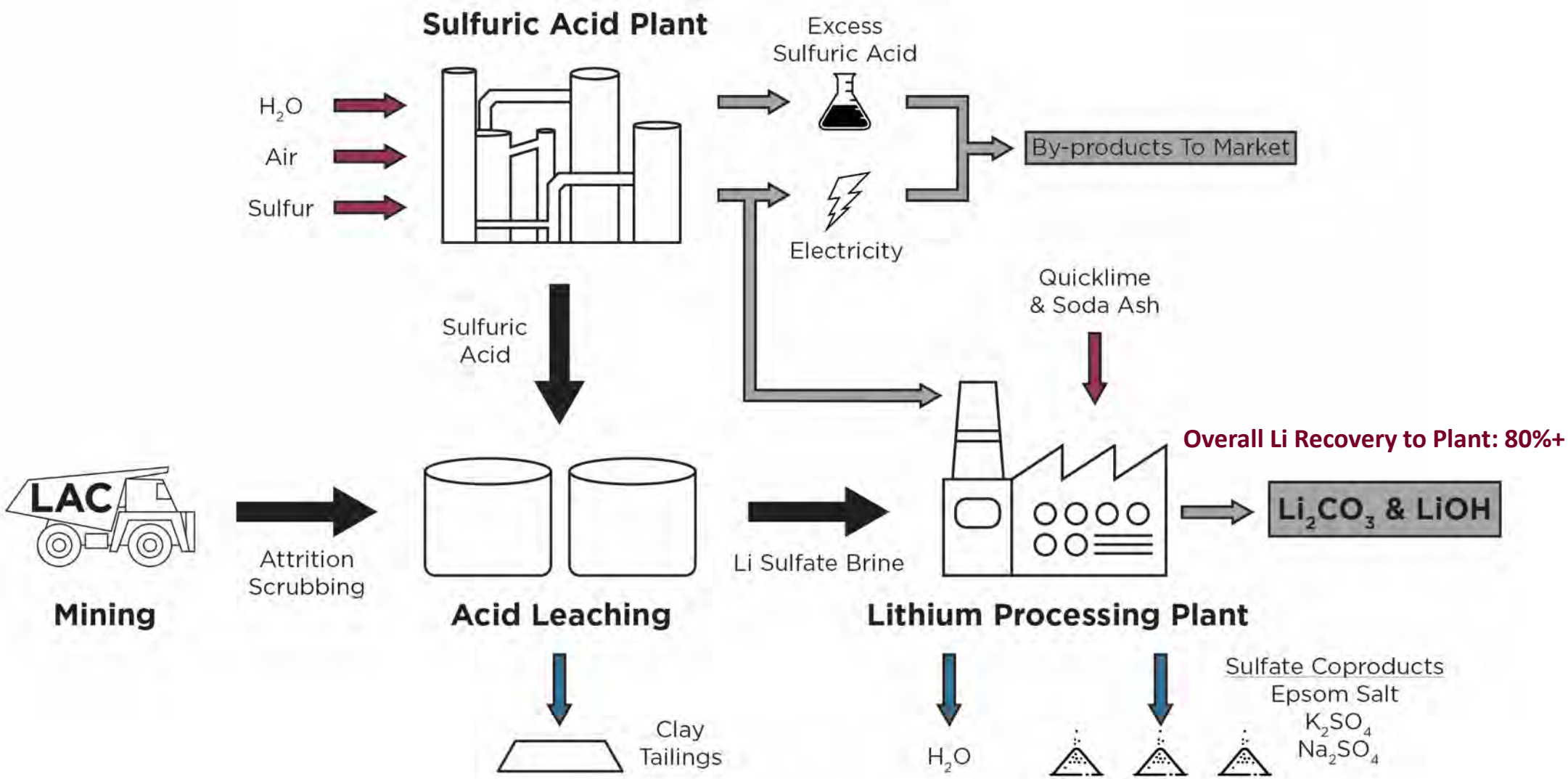

Overall Li Recovery to Plant: 80%+

FILTERED CLAY TAILINGS STORAGE FACILITY

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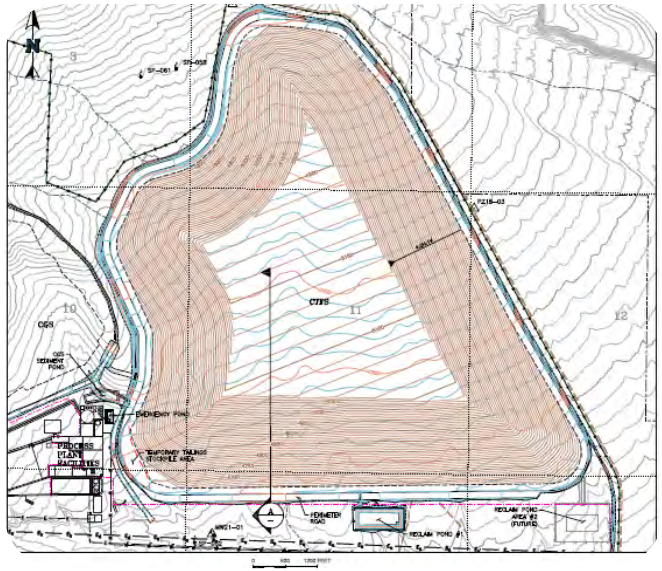
FACILITY DESIGN

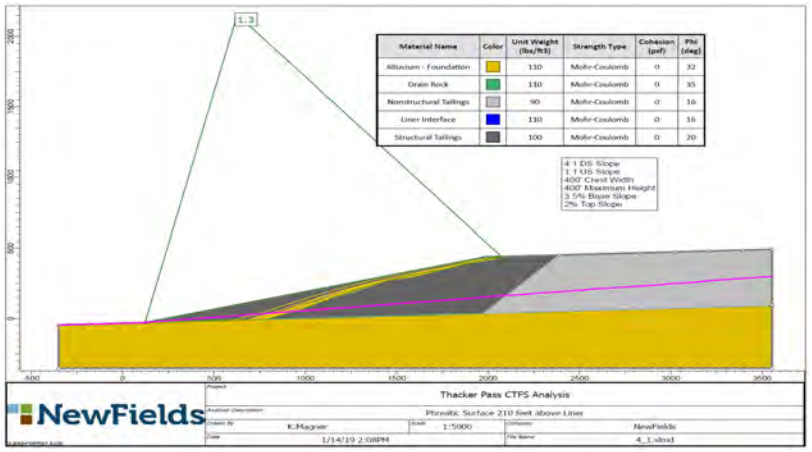
- Safe stacking of dewatered tailings with an exterior structural tailings zone designed at ~4:1 (h:v) slope
- The CTFS is not a water-retaining structure or a dam, eliminating risk of catastrophic tailings flow
- The majority of process water will be recirculated via dewatering
- The CTFS design conforms to seismic standards
- Facility designed by NewFields, experienced in filtered tailings design.

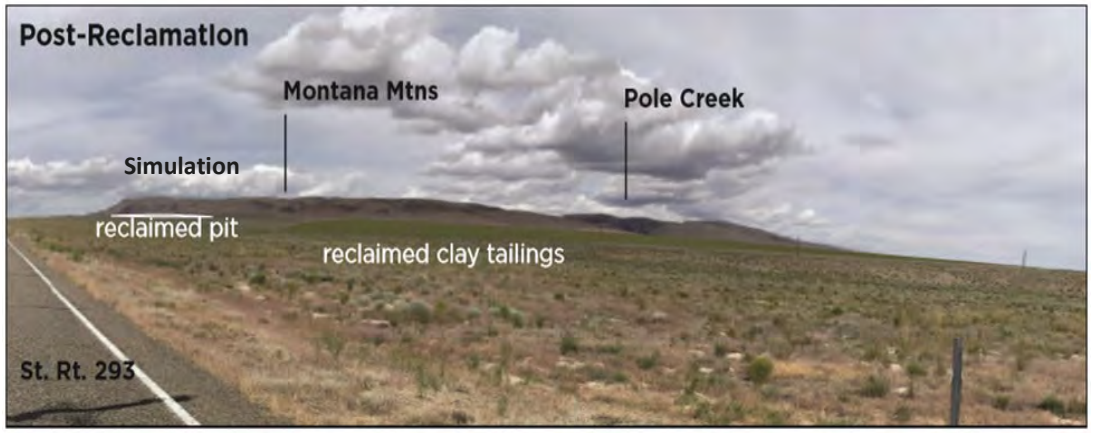


ENVIRONMENT AND RECLAMATION

The facility is underlain by a geomembrane liner and a granular drainage layer to address any seepage risk

- The CTFS has been designed to avoid operational impacts at Pole Creek and to stock-watering
- The entire facility will be reclaimed, top-dressed with native topsoil and re-seeded
- The facility's structural stability enables concurrent reclamation
- Coated reclamation seed mix developed with UNR to be applied.





THACKER PASS ENVIRONMENTAL RESPONSIBILITY

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Thacker Pass is designed to be a low carbon, low water usage source of lithium

- Carbon-free power generation
  - Sulfuric acid plant will provide carbon-free energy
- Low water consumption using recycling
  - Uses up to 2600 AF of well water per year for Phase 1, using existing basin water rights.
  - High water efficiency by using various water recycling techniques
- Reduced footprint using filter stacked tailings
  - Significantly less risk of ground failure than a conventional tailings pond
- Environmental baseline program completed
  - Spent over $6 million on environmental studies and collected data from over 18,600 acres
- Established the Great Basin Sagebrush Habitat Restoration fund
  - Established fund to improve the efficacy of sagebrush habitat reclamation and stop the degradation of sagebrush habitat from wildfires

Low carbon footprint with CO_2 offset from carbon-free power plant

Low water consumption with process designed to recycle water

+65 million EVs reserves support lithium for +1 million electric vehicles per year

Community engagement established Great Basin Sagebrush habitat restoration fund

COMMUNITY BENEFITS

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SPENDING IMPACTS

$1.3 billion in capital investment through Phase 1 and Phase 2

Ripple effect of $650MM additional dollars added to local economy

COMMUNITY ENGAGEMENT

Several open houses

Regular community engagement for 8 years

Van for Fort McDermitt Tribe

Science supplies for local schools

Great Basin Sagebrush Restoration Fund

Mining Industry Foundation for Lowry High

Contributions to Winnemucca Domestic Violence Services Winnemucca Food Bank

TAXES

$6.7 billion - Federal, State and Local Taxes over the ~46-year mine life

$24.5 million - Annual Nevada Net Proceeds of Minerals Taxes

$115.5 million - Annual federal income taxes

$4.5 million - Annual property taxes

EMPLOYMENT

1,000 jobs during construction

300+ permanent jobs following full build-out

175 jobs created indirectly in Humboldt County

SUMMARY

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Lithium Nevada has identified a world-class deposit at Thacker Pass capable of a >41-year mine life.

Addresses lithium critical-mineral risks for U.S.

The Lithium Nevada team plans to permit and build a sustainable mine and processing facility at Thacker Pass.

The Thacker Pass Project can have a profoundly positive impact on U.S. lithium supply and the environmental benefits that flow from electric vehicles and battery storage.

Lithium Nevada is committed to being a great Nevada business:

- listen and respond to community concerns and needs
- create great jobs for the local community
- be a leader in responsible environmental stewardship
- invest in our state through tax generation & the purchase of goods and services

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Appendix C

Public Scoping Comments

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Issue Category	Organization	Comment*
Air Quality and Greenhouse Gases	USEPA	Include a robust analysis of the project's potential to affect air quality. Describe existing air quality in the project vicinity and discuss the National Ambient Air Quality Standards and Prevention of Significant Deterioration increments applicable to air quality in the project area. Explain impacts to the NAAQS and PSD increments from projected emissions of the project and alternatives, considering the effects from all aspects of mine exploration, excavation, construction, operation, and support activities, such as vehicle traffic, as well as cumulative emissions from other sources in the project area.
Air Quality and Greenhouse Gases	USEPA	Coordinate with NDEP regarding regulatory requirements and controls.
Air Quality and Greenhouse Gases	USEPA	Summarize air pollutant emissions for each alternative, including criteria pollutants and hazardous air pollutants (HAPs). Estimated emissions from all mine operations and facilities, such as roads, construction, blasting, excavation, and processing. Emissions sources also include any off-site processing and support activities, such as direct emissions from vehicle traffic and delivery trucks for water, fuels, maintenance supplies, and other materials; indirect emissions from power plants supplying power to the mine; as well as cumulative emissions from other sources in the project area. Conduct modeling to determine concentrations of criteria air pollutants for an accurate comparison with the NAAQS.
Air Quality and Greenhouse Gases	USEPA	Discuss PSD applicability and whether PSD permit might be required. If a PSD permit is required, the increment consumption will need to be determined as well. If a PSD permit is not required, identify whether the baseline date has been triggered for minor sources in the project area. Once the minor source baseline date has been triggered for a certain pollutant in a specified area, all emissions from minor sources (including synthetic minor sources) of that pollutant consume increment. PSD increments exist for sulfur dioxide, nitrogen dioxide, particulates smaller than 10 microns in diameter (PM10), and particulates smaller than 2.5 microns in diameter (PM2.s). Specifically, for Class II areas, the annual PSD increment for nitrogen dioxide is 25 micrograms per cubic meter (µg/m3) ; the annual PM10 increment is 17 µg/m3; the 24-hour PMlO increment is 30 µg/m3; the annual PM2.s increment is 15 µg/m3; and the 24-hour PM2.s increment is 35 µg/m3. Modeling should be conducted to determine concentrations of those criteria air pollutants which would consume PSD increment.
Air Quality and Greenhouse Gases	USEPA	PSD increments are highly protective of air quality in Class I areas such as wilderness areas and national parks. Identify all Class I areas located within 100 kilometers of the proposed project site. Class I areas even farther away could be affected as well. Consult with the U.S. Forest Service for a determination of which areas could be adversely affected by the proposed action. We recommend modelling potential impacts to Class I areas, including Class I PSD increment, and Air Quality Related Values, such as visibility and deposition of nitrogen and sulfur.
Air Quality and Greenhouse Gases	USEPA	Demonstrate that the direct and indirect project emissions conform to the approved State Implementation Plan and would not cause or contribute to violations of the NAAQS. Modeling should be conducted to determine concentrations of criteria air pollutants for an accurate comparison with the NAAQS, as well as emissions in tons per year for purposes of demonstrating whether the project would exceed general Conformity de minimis thresholds. If a General Conformity Determination would be required, the EPA encourages the BLM to work with the appropriate agencies in developing the Draft General Conformity Determination for the project and to identify additional mitigation measures that would be necessary.
Air Quality and Greenhouse Gases	USEPA	Discuss mitigation measures to minimize air pollutant emissions from the mine and include measures to address potential impacts to mine employees or nearby residents, including sensitive receptors. The EPA recommends that diesel particulate matter (DPM) and other criteria pollutants from fugitive sources at the mine be reduced by implementing appropriate mitigation measures, such as the following:
Air Quality and Greenhouse Gases	USEPA	Use particle traps and other appropriate controls to reduce emissions of DPM and other air pollutants. Traps control approximately 80 percent of DPM, and specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM, 40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions;

Issue Category	Organization	Comment*
Air Quality and Greenhouse Gases	USEPA	Minimize construction-related trips of workers and equipment, including trucks and heavy equipment;
Air Quality and Greenhouse Gases	USEPA	Lease or buy newer, cleaner burning equipment (1996 or newer model); and
Air Quality and Greenhouse Gases	USEPA	Employ periodic, unscheduled inspections to ensure that construction equipment is properly maintained at all times, does not unnecessarily idle, is tuned to manufacturer's specifications, and is not modified to increase horsepower except in accordance with established specifications.
Air Quality and Greenhouse Gases	USEPA	Discuss whether and how air quality monitoring would be implemented to ensure project compliance with all applicable air quality standards and permits.
Air Quality and Greenhouse Gases	USEPA	Identify any sustainable design and operation measures that could minimize air pollutant emissions be and provide an estimate of the emissions that would be avoided if these measures were implemented. Clearly indicate whether these measures would be required. For each measure, discuss its permanence, verifiability and enforceability. We recommend that the BLM consider the following measures: Use conveyors rather than haul trucks where possible (e.g., for transporting ore to processing areas and the tailings facility); Incorporate alternative energy components into the project, such as on-site solar and/or geothermal power generation; Offer ride sharing or shuttle opportunities for mine employees commuting to the site from both nearby and distant communities; Commit to using high efficiency diesel particulate filters on new and existing diesel engines to reduce of black carbon emissions.
Air Quality and Greenhouse Gases	USEPA	List in detail all possible sources of HAPs, the unit processes that generate this material, including major/thermal processing equipment, and estimated releases of HAPs from the proposed project to air, soil, and water resources, including any off-site facilities instrumental to mine operations. Discuss the likely fate and transport of HAPs emissions from the proposed project and describe the cumulative amount of these metals that is annually emitted to the air in Nevada.
Air Quality and Greenhouse Gases	USEPA	Discuss how HAPs would be controlled to reduce emissions as much as possible. Identify measures and equipment that would be utilized to condense, capture, and/or treat HAPs, including mercury, lead, and arsenic. Explain how these measures are effective in removing HAPs and limiting release into the environment and indicate how any captured HAPs would be disposed of. Describe the monitoring that would be conducted, including locations and reporting requirements.
Air Quality and Greenhouse Gases	Western Watersheds Project	V. The EIS Should Quantify All of the Project's Greenhouse Gas Emissions and Analyze Their Environmental Impacts and the Project's Claims to Be "Carbon Neutral," "Carbon Free," and "Low CO2 Emissions" According to the Project Applicant's Scoping Presentation, the Applicant plans for the mine to be a "a carbon neutral lithium mining & process operation," including "Generating carbon free energy on-site, to be used in the process."11 However, the Scoping Presentation also describes the Project's processing facility as "low CO2 emissions."12 Carbon neutral, carbon free, and low CO2 emissions are not the same thing, and these conflicting claims strongly suggest confusion about the Project's emissions and impact. The EIS should contain a thorough analysis of the Project's greenhouse gas emission and climate change impacts, including quantifying emissions.
Air Quality and Greenhouse Gases	NV Backcountry Hunters and Anglers	What design measures will there be to address fugitive dust from increased traffic, blasting, drilling, and other general mine operations?

Issue Category	Organization	Comment*
Air Quality and Greenhouse Gases	Great Basin Resource Watch	Mercury emissions. The ore and waste rock needs to be analyzed for mercury content. There needs to be a mercury capture plan with anticipated mercury emissions. Analysis of environmental impacts from expected mercury emissions is also needed.
Air Quality and Greenhouse Gases	Great Basin Resource Watch	In addition to considering mercury emissions from thermal processes the DEIS should discuss impacts from fugitive emission off of heap leach, tailings, and waste rock facilities. Work publicly presented in November 2009, measured these mercury emissions determining that they are not insignificant. Two mines were used in the study, Twin Creeks (Newmont) and Cortez-Pipeline (Barrick), where it was estimated that the fugitive emissions accounted for 19% (12 to 21%) and 17% (15 to 31%) of total at Twin Creeks and Cortez-Pipeline respectively. Thus, according to this analysis the increase in emissions due to fugitive emissions was calculated at 23% (13 to 27%) and 20% (17 to 46%) for the mines respectively.
Air Quality and Greenhouse Gases	Great Basin Resource Watch	GBRW/PLAN/BRW does not accept any argument that these fugitive mercury emissions cannot be estimated and therefore are unknowable. The toxicity of mercury alone demands that every attempt be made to determine the extent of all possible sources and pathways into the environment. In fact the Final Supplementary EIS for the Cortez Hills Expansion Project did provide an estimate of fugitive mercury emissions.
Air Quality and Greenhouse Gases	Great Basin Resource Watch	The expected amount of airborne particles as dust or diesel vehicular emissions from all aspects of the project needs to be determined with concentrations for varying wind factors. Impacts of the “dust” should be evaluated for inhalation health impacts, visibility impairment, and resettling on surface water and vegetation. In the case of resettling on surface water there should be a chemical analysis of the dust to determine whether the dust could have an adverse effects on the chemistry of the water. In general, there needs to be a plan for dust control.
Air Quality and Greenhouse Gases	Great Basin Resource Watch	Analysis should be done to determine whether the land disturbances could change the local microclimate.
Air Quality and Greenhouse Gases	Great Basin Resource Watch	Lithium Nevada in its literature and PoO states the importance of increasing lithium supplies primarily for battery technologies, which ostensibly are needed to move economies away from carbon-based GHG emitting sources. However, this argument is only discussed qualitatively. If the DEIS uses this argument in accessing climate change, then it must be quantified. The DEIS will have to weigh climate affects of the project against potential offsetting from the lithium products in a quantitative way.
Air Quality and Greenhouse Gases	Great Basin Resource Watch	The mine will destroy a portion of the Thacker Pass ecosystem and reduce the ecosystem function in the surrounding environment. This will hamper the environment’s natural ability to moderate climate and emissions that will affect climate. The DEIS needs to address this aspect of climate change as well – how this ecosystem destruction will contribute to climate change.
Alternatives	USEPA	Evaluate in detail all reasonable alternatives that fulfill the project's purpose and need, whether or not such alternatives fall within the jurisdiction of the BLM (40 CFR Section 1502.14(c)). Quantify and present the environmental impacts of all alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public (40 CFR 1502.14).
Alternatives	USEPA	We recommend that the BLM identify alternatives that avoid, minimize and compensate for significant impacts to water, air, wildlife and other resources. Reasonable alternatives could include, but are not necessarily limited to, alternative designs or configurations for major mining facilities such as the clay tailings filtered stack (CTFS), access roads, or storage ponds; a smaller project footprint wherein only some of the proposed actions are approved; and modifications to the proposed closure methodologies and timelines. Identify project design options that avoid significant environmental impact and clearly describe the rationale used to determine whether impacts of an alternative are significant or not.
Alternatives	USEPA	Present proposed closure methodologies and timelines for each alternative and discuss the alternatives in the context of the BLM's authorities under the Mining Law, the Federal Land Policy and Management Act, and other relevant statutes and regulations. We recommend that the BLM determine thresholds of significance by considering the context and intensity of an action and its effects (40 CFR 1508.27) and provide a clear discussion of the reasons for the elimination of alternatives that are not evaluated in detail.

Issue Category	Organization	Comment*
Alternatives	Center for Biological Diversity	BLM must evaluate a range of alternatives, including alternative project siting and/or project designs that could reduce impacts to resources. For example, BLM must consider whether there are alternatives to the proposed sulfuric acid production and ore processing that could reduced impacts to air and water quality. BLM must also evaluate minimization and mitigation measures to reduce impacts that cannot be avoided through alternative project siting or design.
Analysis Methods and Assumptions	USEPA	Address all potential environmental impacts connected to exploration activities and mine construction, operations, closure and post-closure, including all interdependent parts of the mine (40 CFR 1508.25), even those that may occur on lands not managed by the BLM. For example, evaluate the potential impacts to water resources in the Quinn River Valley that may occur from the construction, operation, and eventual closure of the mine. Analyze project alternatives, environmental setting and potential impacts as a whole.
Analysis Methods and Assumptions	USEPA	Discuss the potential for and concentrations of Naturally Occurring Radioactive Material (NORM) at the mine site. Address the possibility that mine beneficiation processes may create Technologically Enhanced Naturally Occurring Radioactive Materials (TENORM) in mine wastes above natural background levels and explain whether TENORM would be a potential impact from the proposed project. Although TENORM has not been a demonstrated issue for mine wastes in Nevada, the unique form of ore at the proposed mine warrants a screening level assessment of the potential for TENORM.
Analysis Methods and Assumptions	Center for Biological Diversity	As with all projects, the draft EIS must provide current baseline data on the resources of the project site and areas that may be impacted off site as well in order to evaluate the potentially significant impacts to resources. These include surface and ground water quantity and quality, air quality, vegetation, soils, habitats, and both rare and common species. The draft EIS must consider all direct, indirect, and cumulative impacts.
Analysis Methods and Assumptions	Center for Biological Diversity	The environmental analysis should consider impacts from all infrastructure - such as roads, water diversion, stormwater diversion, power and utility lines, pipelines, water consumption, impacts of increased population (from the swelling mine employee numbers), etc.
Analysis Methods and Assumptions	Center for Biological Diversity	The environmental analysis should consider and develop alternatives/response plan for a worst-case scenarios. For example, it is not sufficient to describe average and historic climatological data. To assess the potential impacts of climate on the mine the environmental analysis should include flood data/criterion of the probable maximum flood (PMF). Likewise, to properly assess seismicity, the Maximum Credible Earthquake (MCE) should be presented. These data are essential for regulators and the public to reasonably evaluate the interrelationships between the environment and the project.
Analysis Methods and Assumptions	Great Basin Resource Watch	NEPA requires BLM to fully analyze all mitigation measures, their effectiveness, and any impacts that might result from their implementation. NEPA regulations require that an EIS: (1) "include appropriate mitigation measures not already included in the proposed action or alternatives," 40 CFR § 1502.14(f); and (2) "include discussions of: . . . Means to mitigate adverse environmental impacts (if not already covered under 1502.14(f))." 40 CFR § 1502.16(h). NEPA requires that BLM review mitigation measures as part of the NEPA process -- not in some future decision shielded from public review. 40 CFR § 1502.16(h). This includes mitigation for all potentially affected resources such as air and water quality, wildlife, cultural, recreation, visual, etc.
Analysis Methods and Assumptions	Great Basin Resource Watch	Under NEPA, the DEIS must also fully review all direct, indirect, and cumulative environmental impacts of the Project. 40 C.F.R. §§ 1502.16, 1508.8, 1508.25(c). Direct effects are caused by the action and occur at the same time and place as the proposed project. Id. § 1508.8(a). Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Id. § 1508.8(b). Types of impacts include "effects on natural resources and on the components, structures, and functioning of affected ecosystems," as well as "aesthetic, historic, cultural, economic, social or health [effects]." Id. Cumulative effects are defined as: [T]he impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7.

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Analysis Methods and Assumptions	Great Basin Resource Watch	The DEIS must provide any meaningful analysis of the cumulative impacts of all past, present, and reasonably foreseeable future activities/actions. In its cumulative impact analysis, an agency must take a "hard look" at all actions: [A]nalysis of cumulative impacts must give a sufficiently detailed catalogue of past, present, and future projects, and provide adequate analysis about how these projects, and differences between the projects, are thought to have impacted the environmen Without such information, neither the courts nor the public . . . can be assured that the [agency] provided the hard look that it is required to provide. Te-Moak Tribe of Western Shoshone v. U.S. Dep't of Interior, 608 F.3d 592, 603 (9th Cir. 2010) (rejecting EA for mineral exploration that had failed to include detailed analysis of impacts from nearby proposed mining operations).
Analysis Methods and Assumptions	Great Basin Resource Watch	The Ninth Circuit has repeatedly faulted the federal land agencies' failures to fully review the cumulative impacts of mining projects. In the most recent case, vacating BLM's approval of a mine, the court stated that "'in a cumulative impact analysis, an agency must take a 'hard look' at all actions that may combine with the action under consideration to affect the environment.'" Great Basin Resource Watch v. BLM, 844 F.3d 1095, 1104 (9th Cir. 2016) (emphasis in original) (quoting Te-Moak Tribe). BLM violated NEPA because it "did not 'identify and discuss the impacts that will be caused by each successive project, including how the combination of those various impacts is expected to affect the environment.'" Id. at 1105, quoting Great Basin Mine Watch, 456 F.3d 973-74.
Analysis Methods and Assumptions	Great Basin Resource Watch	In Great Basin Mine Watch, the Ninth Circuit required "mine-specific . . . cumulative data," a "quantified assessment of their [other projects] combined environmental impacts," and "objective quantification of the impacts" from other existing and proposed mining operations in the region. Id. at 972-74. The agency cannot "merely list other [projects] in the area without detailing impacts from each one." Id. at 972. See also ONRC v. Goodman, 505 F.3d 884, 893 (9th Cir. 2007).
Analysis Methods and Assumptions	Great Basin Resource Watch	In addition to the fundamental cumulative impacts review requirements noted above, NEPA regulations also require that the agency obtain the missing "quantitative assessment" information. 40 C.F.R. § 1502.22. "If there is 'essential' information at the plan- or site-specific development and production stage, [the agency] will be required to perform the analysis under § 1502.22(b)." Native Village of Point Hope v. Jewell, 740 F.3d 489, 499 (9th Cir. 2014). Here, the adverse impacts from the Project when added to other past, present, or reasonably foreseeable future actions is clearly essential to BLM's determination (and duty to ensure) that the projects comply with all legal requirements and minimizes all adverse environmental impacts.
Analysis Methods and Assumptions	Great Basin Resource Watch	Under NEPA, BLM must also fully analyze the baseline conditions of all potentially affected resources. BLM is required to "describe the environment of the areas to be affected or created by the alternatives under consideration." 40 CFR § 1502.15. The establishment of the baseline conditions of the affected environment is a fundamental requirement of the NEPA process. "Without establishing the baseline conditions which exist ... before a project begins, there is simply no way to determine what effect the project will have on the environment, and consequently, no way to comply with NEPA." Great Basin Resource Watch, 844 F.3d at 1101, quoting Half Moon Bay Fisherman's Mktg. Ass'n. v. Carlucci, 857 F.2d 505, 510 (9th Cir.1988). "[W]ithout [baseline] data, an agency cannot carefully consider information about significant environment impacts. Thus, the agency fails to consider an important aspect of the problem, resulting in an arbitrary and capricious decision." N. Plains Resource Council, Inc. v. Surface Transp. Bd., 668 F.3d 1067, 1085 (9th Cir.2011). This includes the requirement to fully analyze for public review the quality and quantity of ground and surface waters, wildlife, recreation, cultural, air quality, and all potentially affected resources.
Analysis Methods and Assumptions	Great Basin Resource Watch	FLPMA and BLM mining regulations require that all activities on public land comply with all environmental protection standards, including air and water quality standards. See, e.g., 43 CFR § 3809.5 (definition of "Unnecessary of Undue Degradation" prohibited under FLPMA includes "fail[ure] to comply with one or more of the following: … Federal and state laws related to environmental protection."); § 3809.420(b)(4) (listing Performance Standards that must be met, including the requirement that "All operators shall comply with applicable Federal and state air quality standards, including the Clean Air Act (42 U.S.C. 1857 et seq.)."

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Analysis Methods and Assumptions	Great Basin Resource Watch	The same is true for operations that are not specifically authorized by the 1872 Mining Law (such as the waste and tailings facilities discussed above) which are properly governed by DOI/BLM's FLPMA special use regulations : "(b) Each land use authorization shall contain terms and conditions which shall: … (3) Require compliance with air and water quality standards established pursuant to applicable Federal or State law." 43 C.F.R. §2920.7(b)(3). NEPA requires that: "Environmental impact statements shall state how alternatives considered in it and decisions based on it will or will not achieve the requirements of sections 101 and 102(1) of the Act [NEPA] and other environmental laws and policies." 40 C.F.R. § 1502.2(d).
Cultural Resources	Nevada State Historic Preservation Office	The SHPO cannot determine if the Bureau of Land Management is using this public consultation process to meet its obligations under Section 106 of the National Historic Preservation Act and the Statewide Protocol Agreement. If so, the SHPO recommends that, consistent with guidance provided by CEQ and ACHP, the Bureau of Land Management should include a statement in any public notice about the project that the agency intends to comply with Section 106 as well as NEPA public notification requirements.
Cultural Resources	Great Basin Resource Watch	The project area must be surveyed for historical and archeological artifacts, and mitigation plans must be developed for any of these sites.
Cumulative Effects	USEPA	According to CEQ regulations implementing NEPA, a cumulative impact is " ... the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7).
Cumulative Effects	USEPA	Cumulative impacts analyses are important to the Draft EIS as they describe the threats to resources as a whole. Understanding cumulative impacts can illuminate opportunities for minimizing those threats. Describe the potential cumulative impacts associated with the proposed project and alternatives, as well as the methodology used to assess them. This would include consideration of impacts in the cumulative context of all impacts associated with the project, including impacts related to other mines in the hydrographic area. Guidance on how to analyze cumulative impacts has been published by the CEQ1 and the EPA.2 (1 Council on Environmental Quality. January 1997. Considering Cumulative Effects Under the National Environmental Policy Act. Available at: https://www.energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-CEQ ConsidCumu!Effects.pdf.)(2 U.S. Environmental Protection Agency. May 1999. Consideration of Cumulative Impacts in EPA Review of NEPA Documents. Available at: https://www.epa.gov/sites/production/files/2014-08/documents/cumulative.pdf.)
Cumulative Effects	USEPA	We recommend for the Draft EIS to: Consider meaningful impacts and natural boundaries, and focus on each affected resource/ ecosystem when describing the affected environment; Focus on resources of concern (i.e., those resources that are "at risk" and/or are significantly affected by the proposed project) before mitigation. Identify which resources are analyzed, which ones are not, and why; Identify all other on-going, planned, and reasonably foreseeable projects in the study area. Where studies exist on the environmental impacts of these other projects, use these studies as a source for quantifying cumulative impacts; Include appropriate baselines for the resources of concern with an explanation as to why those baselines were selected; and Propose and commit to mitigation when cumulative impacts. Clearly state who would be responsible for mitigation measures and how mitigation implementation would be ensured.
Cumulative Effects	USEPA	In the Draft EIS, we recommend that the BLM include a description of existing and anticipated future conditions in the project area to demonstrate how environmental conditions, such as temperature and precipitation regimes, are expected to change in the hydrographic area through the anticipated life of the project, including post-closure activities.
Cumulative Effects	USEPA	Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. If cumulatively significant impacts could occur in combination with effects from the project, we recommend that the Draft EIS consider reasonable alternatives that include adaptive management objectives to account for future projected changes.

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Cumulative Effects	Center for Biological Diversity	The environmental analysis should analyze and discuss all cumulative impacts, including all past, present, and reasonably foreseeable future actions which when viewed with other proposed actions have cumulatively significant impacts. Like the analysis of ongoing exploration near this site, the environmental analysis should consider the impacts of connected actions that are related to each other.
Cumulative Effects	Great Basin Resource Watch	The EIS should also examine how the various impacts of this mine will add to the collective impacts of other ecosystem disturbing projects in the region. For example, could mercury emissions from the mine when taken together with other mercury sources in the region result in mercury exceedence according to the Clean Air Act. Or, does the mine disturbance further impair the regional ecosystem resulting in seriously threatening fauna and/or flora. The cumulative impact analysis needs to address cultural traditions as well, such as the pine nut harvest.
Cumulative Effects	Great Basin Resource Watch	A cumulative impact is "the impact on the environment which results from incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non- Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." iv This definition is critical to determining the proper area to be studied in a cumulative impact assessment.
Cumulative Effects	Great Basin Resource Watch	Affects on Climate. As part of the cumulative analysis the DEIS must include climate change analysis. Lithium Nevada has stated that the project is planned to be carbon neutral, but this does not mean that net greenhouse gas emissions will not occur. BLM needs to do a thorough analysis of greenhouse gas (GHG) emission from all aspects of the project including emissions including any supporting actives. For example, the sulfuric acid factory is to be constructed, and its operations will import large quantities of sulfur resulting in GHG emission in the transport process. Any increase in emissions as a result of this operation must be included.
Environmental Justice	USEPA	Executive Order 12898 on environmental justice directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. Identify if minority and low-income populations would be potentially affected by the project, and address whether any of the alternatives would cause any disproportionate adverse impact, such as displacement, changes in existing resources or access, or community disruption. The EPA recommends including McDermitt and Orovada in this analysis.
Environmental Justice	USEPA	Identify potential mitigation measures for any adverse environmental justice effects and describe the measures taken by the BLM to: Fully analyze the environmental effects of the proposed Federal action on minority communities and low-income populations; and Present opportunities for affected communities to provide input into the NEPA process. Specify whether the analysis meets requirements of BLM's environmental justice strategy.
Financial Surety	Center for Biological Diversity	A financial surety to cover both mine closure and post-closure monitoring and maintenance should be calculated based on the preliminary reclamation plan. If the mine operator goes bankrupt, then the public would be faced with tens of millions of dollars - or more- in financial liability. This liability is critical to disclose and consider as part of the environmental analysis. Further, this will hopefully be the basis to establish an actual, adequate financial surety to cover this liability.
Financial Surety	Center for Biological Diversity	The financial security should be calculated to include the costs of government maintenance/restoration of the reasonably possible impacts from mining - and all related costs; emergency response (including replacing water); inflation (unless the financial assurance is recalculated annually, so as to ensure that cost adjustments are made to reflect the current year's values); indirect costs; and a multiplier to account for potential inaccuracies in the estimates, thus ensuring that the government is readily able to pay for the costs of stepping into the operations and/or maintenance of the site and/or sites impacted by mining or related activities.
Financial Surety	Center for Biological Diversity	Financial surety cost calculations should be clearly explained in the EIS. The form of the financial surety can be as important as the amount. Financial securities must ensure a predictable amount of money is available, that the funds are secure, and that the funds are readily available should the government need to "call on" the financial security funds. Recent years have underscored that no company is "too big to fail" and therefore corporate guarantees should not be allowed. A well-calculated bond is of little value if the funds behind it are not carefully planned/secured. Therefore, the environmental analysis should be sufficiently detailed to ensure that the government can effectively step into/maintain engagement.

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Livestock Grazing	Public	As owners of the BLM Pole Creek Grazing Allotment that will be directly impacted by the Thacker Pass Plan of Operations and Reclamation Plan (BLM Casefile NVN-098586) and the Thacker North-South :Exploration Plan of Operations and Reclamation Plan (NVN-098582) submitted by Lithium Nevada Corporation we request a full economic and vegetation analysis in the Environmental Impact Statement (EIS) of how this project will not only impact the well-being of the community and local area but how it will economically impact our ranching operation, thus our economic future.
Livestock Grazing	Public	In reviewing the information posted in the Federal Register (85:13, January 21, 2020) it states that "The BLM has identified some preliminary issues associated with the Project: (a) Dewatering during mining and the formation of a pit lake after completion of mining activities; (b) Potential impacts to streams occupied by Lahontan cutthroat trout, a threatened species under the Endangered Species Act of 1973, as amended; (c) Potential impacts to visual resources; (d) Potential impacts to wildlife habitat; and (e) Potential impacts to cultural resources....". We fail to see any mention of an economic impact analysis being conducted, especially as it relates to grazing allotments, particularly the Pole Creek Allotment (NV00008) of which we hold. Additionally, we fail to see any consideration of the mines potential impact on the vegetation our grazing allotment is based on beyond potential impacts to wildlife habitat.
Livestock Grazing	Public	The proposed mine location essentially splits out allotment in half, as well as eliminating our North Thacker, Sentinel Seed and most all of our Sentinel Rock Native pastures. The ultimate disturbance footprint of the operation is listed as 5,700 acres. This is 17% of our allotment public land area and could potentially represent a loss of 403 animal unit months (AUM) of forage to our operation. The proposed plans involve expanding the project boundary to approximately 18,000 acres. This is 52%of the public land on the allotm ent and represents a potential loss of 1,235 AUMs of forage to us. Losses of this extent makes operation of our allotment economically marginal to infeasible for a small operation such as ours for a single year, not to mention 41 years, the proposed life expectancy of the project.
Livestock Grazing	Public	Additional to this direct loss, the potential exists for further loss of grazing resources from the installation of pipelines, haul and secondary roads and transmission lines. Linear disturbances such as these have been shown to be potential routes for the movement of invasive species such as cheatgrass that further reduce native vegetation and thus grazing carrying capacity. NEPA directs agencies to consider both economic and environmental impacts. We fail to see any planed consideration of economic impacts, especially to the economics of our operation that depends on this allotment, and to the native vegetation beyond wildlife habitat. We encourage the BLM to include these specific components in their EIS.
Livestock Grazing	Public	In addition, we wish to express concerns about potential impacts to our local livestock watering sources. The plan does not anticipate that the pit will dewater the area. However, if this is incorrect, further impacting our operation, what are the alternatives being considered to mitigate this potential impact? With this increase in infrastructure and increased human presence the risk of wildfire may increase. We would ask that a consideration if a wildfire occurs, furthering potential loss of the grazing forage resource, that there be an alternative considered to provide replacement forage for our livestock.
Livestock Grazing	Public	In conclusion we are highly concerned about how this project will impact our grazing operation and thus the economic viability of our ranching operation. We feel this project could cause serious economic and environmental impact, especially for us as this project affects essentially just our allotment. We request that in the development of this proposed EIS that a full economic and vegetation analysis be conducted, especially as it impacts the owners of the allotment as we are concerned about the economic harm it may cause us.
Mitigation	USEPA	Identify and describe appropriate mitigation measures associated with the project, specifying which ones would be committed to by the mine operator and/or required by the BLM or another federal, state, or local agency. Explain how each measure would specifically mitigate the targeted impact, provide substantial detail on the means of implementing each mitigation measure, identify who would be responsible for implementing mitigation, indicate whether it is enforceable, and describe its anticipated effectiveness.
Mitigation	USEPA	We recommend that for each impact area, the Draft EIS describe the specific mitigation implementation thresholds, any mitigation implementation and effectiveness monitoring deemed necessary, and the criteria by which success would be determined once mitigation is fully implemented. Furthermore, for some mitigation measures, it may be necessary to describe the contingency planning and adaptive

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		management options in place if mitigation is found to be less than fully successful.
Mitigation	Nevada Department of Transportation	Analyze the feasibility of the presence of noxious weeds and recommend mitigation measures. Also please address possible track out issues and recommend rectifications.
Mitigation	Center for Biological Diversity	A full underliner, underdrain, and monitoring system should be analyzed for surface- deposited waste materials, unless the mine proponent demonstrates (using widely accepted industry procedures and standards) that AMD or other leachate/contamination will not occur. If a further potential for contamination is later discovered, then surface deposited materials should also be top-lined.
Mitigation	Great Basin Resource Watch	The geochemical analysis of waste rock, heap leach and tailings materials must updated using data gathered since the last analysis for potential acid production, including crystallographic analysis to determine the extent of fracturing expected upon blasting. In this regard the full range of static and kinetic tests need to be preformed: determine the NAPP and NAG values, for example. The DEIS should contain a plan to handle acid generation, or a contingency plan accounting for markedly varying acid generation capacity as the mining proceeds that is not expected from preliminary testing. In our experience, predictions are often far off the mark, so detailed plans are needed for public review to assure that the various operations will be able to mitigate in the event of acid generation.
Mitigation	Theodore Roosevelt Conservation Partnership	In conclusion, BLM and Lithium Nevada must work to develop avoidance and mitigation strategies to protect and conserve the above-mentioned resources. Those strategies need to be developed and vetted before any further exploration or disturbance or development is allowed.
Mitigation	Public	As the BLM examines the mitigation measures as part of the alternative development (40 CFR § l 502.14(f)), it is important that it include mitigation, implementation, monitoring and effectiveness, enforcement, funding and/or bonding for the life of the mine. These mitigation requirements should be incorporated into the project design as integral components of the proposed action.
NEPA Process	USEPA	In accordance with 40 CFR 1502.13, "specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." The purpose of the proposed action is typically the specific objectives of the activity, while the need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity. Include a clear, objective statement of the rationale for the proposed project, as it provides the framework for identifying project alternatives and concisely identify why the project is being proposed, and why it is being proposed now. Focus on the specific desired outcomes of the project rather than prescribing a predetermined resolution.
NEPA Process	Friends of Animals	Please do not fast track the review of this project that would irretrievably alter the landscape and instead fully analyze and disclose the significant impacts of this project on humans and animals alike.
NEPA Process	Public	It is my understanding that my comments are part of the Thacker Pass EIS scoping process whereby BLM determines what shall be included in the EIS. It is also my understanding that this public comment process is designed for the BLM to make decisions protective of the environment as it may be adversely impacted by part or all of this project. In this light I submit the following facts, comments, observations, questions, and recommendations that I feel will mitigate certain aspects of the project.
NEPA Process	Western Watersheds Project	BLM Must Consider All Timely Submitted Comments That It Receives During the Thacker Pass Lithium Mine Scoping Period, Including Comments on the Plan of Operations. During the scoping comment period process, BLM stated in an email to Western Watershed Project that it would not accept scoping comments regarding the contents of the mine's Plan of Operations (PoO).1 This violates 43 CFR § 46.305(a)(1): "The bureau must consider comments that are timely received, whether specifically solicited or not." This comment letter, submitted during the Project's scoping comment period, counts as timely received. Therefore, BLM must consider this letter's comments on the PoO2 and any other comments on the PoO that it receives during the scoping comment period. It is also important to note that BLM's email misinterprets 43 CFR 3809.411(c). The regulation requires BLM to make the PoO available during the DEIS comment period and consider comments on it; however, the regulation does not prohibit BLM from considering timely received comments on the PoO provided by the public during scoping.

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		Indeed, BLM's Colorado River Valley Field Office recently posted a PoO modification online well before the start of public scoping, simply because there was high public interest.3 1 See Attachment 1. February 19, 2020 email from Ken Loda (BLM) to Kelly Fuller (Western Watersheds Project). 2 See Attachment 2. Thacker Pass Project: Proposed Plan of Operations and Reclamation Plan. 3 See Attachment 3. Colorado River Valley Field Office Website. Accessed February 26, 2020. Available at https://www.blm.gov/office/colorado-river-valley-field-office.
NEPA Process	Western Watersheds Project	BLM Must Conduct a 90-Day Public Comment Period for the DEIS. To amend the RMP to accommodate the Thacker Pass lithium mine, BLM must follow NEPA implementing regulations.4 These include, but are not limited to, providing a full 90-day public comment for the RMP amendment, per 43 CFR §1610.2(e): "Ninety days shall be provided for review of the draft plan and draft environmental impact statement." This regulatory requirement applies regardless of any Department of Interior (DOI) NEPA timeframe guidance. 4 See 43 CFR §1610.5-5 : "An amendment shall be made through an environmental assessment of the proposed change, or an environmental impact statement, if necessary, public involvement as prescribed in §1610.2 of this title, interagency coordination and consistency determination as prescribed in §1610.3 of this title and any other data or analysis that may be appropriate. In all cases, the effect of the amendment on the plan shall be evaluated. If the amendment is being considered in response to a specific proposal, the analysis required for the proposal and for the amendment may occur simultaneously."
NEPA Process	Western Watersheds Project	The EIS Must Conform to Additional NEPA, FLPMA, and Other Requirements. NEPA requires BLM to fully analyze all mitigation measures, their effectiveness, and any impacts that might result from their implementation. NEPA regulations require that an EIS: (1) "include appropriate mitigation measures not already included in the proposed action or alternatives," 40 CFR § 1502.14(f); and (2) "include discussions of: . . . Means to mitigate adverse environmental impacts (if not already covered under 1502.14(f))." 40 CFR § 1502.16(h). NEPA requires that BLM review mitigation measures as part of the NEPA process -- not in some future decision shielded from public review. 40 CFR § 1502.16(h). This includes mitigation for all potentially affected resources such as air and water quality, wildlife, cultural, recreation, visual, etc.
NEPA Process	Western Watersheds Project	Under NEPA, the DEIS must also fully review all direct, indirect, and cumulative environmental impacts of the Project. 40 C.F.R. §§ 1502.16, 1508.8, 1508.25(c). Direct effects are caused by the action and occur at the same time and place as the proposed project. Id. § 1508.8(a). Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Id. § 1508.8(b). Types of impacts include "effects on natural resources and on the components, structures, and functioning of affected ecosystems," as well as "aesthetic, historic, cultural, economic, social or health [effects]." Id. Cumulative effects are defined as: [T]he impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7.
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NEPA Process	Western Watersheds Project	Te-Moak Tribe of Western Shoshone v. U.S. Dep't of Interior, 608 F.3d 592, 603 (9th Cir. 2010) (rejecting EA for mineral exploration that had failed to include detailed analysis of impacts from nearby proposed mining operations). The Ninth Circuit has repeatedly faulted the federal land agencies' failures to fully review the cumulative impacts of mining projects. In the most recent case, vacating BLM's approval of a mine, the court stated that "'in a cumulative impact analysis, an agency must take a 'hard look' at all actions that may combine with the action under consideration to affect the environment.'" Great Basin Resource Watch v. BLM, 844 F.3d 1095, 1104 (9th Cir. 2016) (emphasis in original) (quoting Te-Moak Tribe). BLM violated NEPA because it "did not 'identify and discuss the impacts that will be caused by each successive project, including how the combination of those various impacts is expected to affect the environment.'" Id. at 1105, quoting Great Basin Mine

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NEPA Process	Western Watersheds Project	In addition to the fundamental cumulative impacts review requirements noted above, NEPA regulations also require that the agency obtain the missing "quantitative assessment" information. 40 C.F.R. § 1502.22. "If there is 'essential' information at the plan- or site-specific development and production stage, [the agency] will be required to perform the analysis under § 1502.22(b)." Native Village of Point Hope v. Jewell, 740 F.3d 489, 499 (9th Cir. 2014). Here, the adverse impacts from the Project when added to other past, present, or reasonably foreseeable future actions is clearly essential to BLM's determination (and duty to ensure) that the projects comply with all legal requirements and minimizes all adverse environmental impacts.
NEPA Process	Western Watersheds Project	Under NEPA, BLM must also fully analyze the baseline conditions of all potentially affected resources. BLM is required to "describe the environment of the areas to be affected or created by the alternatives under consideration." 40 CFR § 1502.15. The establishment of the baseline conditions of the affected environment is a fundamental requirement of the NEPA process. "Without establishing the baseline conditions which exist ... before a project begins, there is simply no way to determine what effect the project will have on the environment, and consequently, no way to comply with NEPA." Great Basin Resource Watch, 844 F.3d at 1101, quoting Half Moon Bay Fisherman's Mktg. Ass'n. v. Carlucci, 857 F.2d 505, 510 (9th Cir.1988). "[W]ithout [baseline] data, an agency cannot carefully consider information about significant environment impacts. Thus, the agency fails to consider an important aspect of the problem, resulting in an arbitrary and capricious decision." N. Plains Resource Council, Inc. v. Surface Transp. Bd., 668 F.3d 1067, 1085 (9th Cir.2011). This includes the requirement to fully analyze for public review the quality and quantity of ground and surface waters, wildlife, recreation, cultural, air quality, and all potentially affected resources.
NEPA Process	Public	Since this project has a significant effect on the environment, the expedited processing that has been proposed is not appropriate. While there are currently pending revisions to the NEPA process designed to ensure that environmental documents prepared pursuant to NEPA are concise and serve their purpose of informing decision makers regarding the significant potential environmental effects of proposed major Federal actions and the public of the environmental issues in the pending decision-making process; they still mandate that significant effects be addressed in a full EIS and broad public involvement.
NEPA Process	Earthworks	Many people at the public meeting at the Orovada Community Center on February 6, 2020 were unclear on the proposal, stated the project had changed too many times, and expressed mistrust towards the company. Meaningful public comments cannot occur if the project is not well understood. People also felt there was not enough time for comments to be made. Additionally, there is a stated goal by both the company and The Bureau of Land Management to streamline the permitting process. Lithium Nevada emphasizes how important it is to get lithium production on line rapidly to meet expected demand. However, a harder look at the effects of this mine is still needed under law in the Environmental Impact Statement process; this must include meaningful exploration of alternatives, and cumulative impacts analysis.
NEPA Process	Public	Inadequate info in scoping process, no current plan of operations, incomplete (unreadable) and wildlife (unreadable), loss of significant sagebrush habitat; limited local infrastructure and service; no housing; loss of access to public land; loss of natural and man made water resource and grazing allotment. Inadequate highway, especially SR 293, no garuntee against mining on other held claims, noise, dust, chemicals. Reclamation plans?
Project Description/Plan of Operations	Center for Biological Diversity	Some of the mine's proposed technologies are reasonably considered new or novel. The environmental analysis should specially screen and consider any new technology proposed for mining, reclamation, and mitigation. These should be specially screened and avoided unless widely demonstrated to be reliable and effective over time. This is particularly relevant for lithium clay mining methods, which are comparatively novel and may contain significant unknowns, such as compared to brine mining. The mine proponent should bear the burden of proving the

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		efficacy of any new or novel treatment (or the applicability of a reclamation method to a particular mine). This proof should demonstrate the method's effectiveness and lack of liabilities employing widely accepted methodologies that are applicable to the Thicker Pass site/region. The entire body of proof and supporting data must be available for public and regulatory review and comment.
Public Access	Coalition for NV Wildlife	Sportsmen access must be maintained to public land.
Public Access	Public	Finally, I am very concerned about access to the area of the Montana Mountains adjacent to the project site for hunting, hiking, and wildflower viewing once the project begins and into the future.
Public Access	Public	Please spell out in the EIS what measures are being taken to insure continued access to this beautiful area for me and future generations of Americans.
Public Access	NV Backcountry Hunters and Anglers	We would like assurances that sportsmen's access to public land surrounding the entire project area will not be affected.
Public Access	Theodore Roosevelt Conservation Partnership	Access for Recreation: Recreation access, including by sportsmen for hunting is an important part of the culture and custom of this area. Roads currently open for recreational access should remain open.
Reclamation	USEPA	Understanding reclamation, closure and post-closure design is critical to understanding the potentially significant environmental impacts of the project. The EPA recommends that the Draft EIS describe the reclamation, closure and post-closure management of the proposed project, including: A detailed account of measures that would be taken to decommission mine operations and stabilize and revegetate slopes, waste rock facilities, leach piles, tailing impoundments, roads and other areas; Estimate the acreage of each area targeted for reclamation, and describe the intended degree of treatment in each area; Discuss the timing of reclamation relative to mining operations, procedures for concurrent reclamation activities, and duration of reclamation treatment; and Discuss the standards for determining reclamation success and the means of assuring that all maintenance required for reclaimed areas would continue after operations cease or while operations are suspended.
Reclamation	USEPA	Reclamation and closure of the waste rock storage facilities, coarse gangue stockpile, and CTFS typically involves placing growth media over rock material to provide store and release covers for the purpose of reducing infiltration of meteoric water. Describe the availability, properties, and sources of cover material and/or growth media, discuss how it would be applied to disturbed areas, and identify any additional measures (e.g., soil amendments) that may be needed to ensure successful reclamation and revegetation of the project site.
Reclamation	USEPA	Explain whether a synthetic geomembrane will be required to prevent interstitial water infiltration into mine facilities. Cover design should be described in detail with supporting data to demonstrate anticipated effectiveness. Identify the permeability standard that growth media or other cover material would be designed to achieve, provide the basis for infiltration rates and cover/growth media thickness estimates, and discuss their effectiveness in minimizing exposure of mined material to meteoric water that could mobilize contaminants.
Reclamation	USEPA	The EPA recommends that revegetation be accomplished with only native species indigenous to the area in order to restore the ecosystem to as natural a state as possible after mine closure. The EPA also recommends that revegetation success be monitored and enforced for at least five years following revegetation efforts post-closure.
Reclamation	USEPA	Describe the reclamation and closure of the CTFS, including capping/covers, draindown facilities, chemistry and fate of drain down fluids, and projected drain down times. The Draft EIS should assess the effectiveness of various cap/cover systems in reducing meteoric water flow through the CTFS. Discuss in detail how draindown fluids from the facilities would be captured, treated and controlled over the closure and post-closure period. Include a description of the capacity of evapotranspiration (ET) cells, the likelihood that this capacity will be sufficient, and

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		the contingency in the event of ET cell overflow. Discuss the implementation, performance, and effectiveness monitoring, and follow up actions that would be taken should destabilization or contamination be detected.
Reclamation	USEPA	Examine the potential for long-term or perpetual drain down of the tailings and how this water would be treated and discharged. We recommend that the Draft EIS assess a gravity drain and passive treatment systems for closure/post-closure management of the tailings drainage, which could obviate the need for pumping and reduce long-term post-closure costs.
Reclamation	USEPA	In light of recent catastrophic events at Mount Polley Mine in British Columbia in 2014, at Samarco in Brazil in 2015, and the failure of a tailings impoundment at Pinto Valley Mine in 1997, tailings storage facilities' stability should be considered in the Draft EIS. Discuss the public safety and environmental impacts of potential tailings storage facilities' catastrophic failure, as well as measures to prevent and respond to such failures. Include any and all tailings storage facilities affected by the project. The risk of catastrophic failure increases with both the height of tailings facilities and the use of the upstream dam construction method. Because the proposed tailings facility would be adjacent to Highway 293, we recommend identification of potential failure modes and effects, as well as design and mitigation measures, such as a Failure Mode and Effects Analysis. Describe monitoring and inspection requirements for tailings facilities in all remaining phases of the mine. For phases with significant uncertainty, consider an adaptive management approach to design and operations with the goal of reducing failure risk.
Reclamation	USEPA	Consider a formal Emergency Action Plan (EAP) for tailings storage facilities. An EAP serves to document the procedures to be undertaken in the event of an emergency. In the case of tailings storage facilities, an EAP can help to prevent the occurrence or exacerbation of a failure. Include information in the Draft EIS on how to respond to an accidental spill event.
Reclamation	USEPA	The viability of the bond can impact project outcomes; we recommend that the Draft EIS sufficiently describe reclamation bonding requirements and amounts for the proposed project and alternatives.
Reclamation	USEPA	Discuss how the BLM could modify the bond during the course of operations if temporary, long-term, or perpetual treatment and/or remediation needs are discovered during operations. Describe bonding requirements and other measures that BLM and State regulators have in place to ensure funds would be immediately available should the mine operator or its insurer be unable to fund the required reclamation or closure activities.
Reclamation	USEPA	Specify all necessary long-term monitoring and management of the mine, as well as the enforcement mechanisms by either the BLM or other regulators should the mine operator fail to successfully implement the long-term post-closure plan. Define the time frame over which long-term management activities would occur or whether they might be necessary into perpetuity.
Reclamation	USEPA	Include projected costs for any post-closure activities and discuss whether the BLM would impose on the mine operator a requirement to establish a trust fund or other funding mechanism to ensure post closure care, in accordance with 43 CFR 3809 and BLM's H-3809-1 Surface Management Handbook. Explain those areas of the mine, and activities within the overall mine, that would or would not be considered under these regulations and policies.
Reclamation	USEPA	Describe any long-term management that may be needed at the mine after mine closure, including any lands not managed by the BLM. If a long-term funding mechanism is deemed necessary, the EPA recommends that the Draft EIS include a description of the proposed funding mechanism. Any financial assurance must be kept current as conditions change at the mine. The terms of the fund are critical to determining whether sufficient funds would be available to implement the post-closure plan and reduce the possibility of long-term contamination problems. The EPA recommends that the discussion include the following information: Requirements for timing of payments into the trust fund; How to ensure the trust fund would be bankruptcy remote; Acceptable financial instruments; Tax status of the trust fund; Identity of the trust fund beneficiaries; and Identity of the operator with responsibility/liability for financial assurance at this site.
Reclamation	USEPA	The EPA believes that this information would be important to include in the Draft EIS if the potential impacts of the project would necessitate a long-term trust fund; such information could make the difference between a project sufficiently managed over the long-term by the site operator, or an unfunded/under-funded contaminated site that becomes a liability for taxpayers. In the absence of an appropriate guarantee,

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		the EPA could consider a project unacceptable if it could result in unmitigated impacts exceeding environmental standards on a long-term basis.
Reclamation	Public	I've read at great length the debate points that the land can and will be reclaimed by the mining companies. Do not believe this for one minute that this natural beauty will ever be reclaimed close to its natural state. Ground waters will suffer irreparable harm. I've seen the devastation of open pit mining, mountain top removal, strip mining, and deep mining.
Reclamation	Center for Biological Diversity	All a, b, and c horizon soil materials should be salvaged and stored to ensure that all reasonably reusable growth media is salvage and stored for use during reclamation. The more growth media the better for effective reclamation - the mine should not be allowed to not salvage reasonably reusable materials under the guise that the reclamation plan does not require all the materials available prior to mining.
Reclamation	Center for Biological Diversity	A preliminary reclamation plan should be produced for the environmental analysis that is sufficiently detailed to allow regulators and the public to understand exactly how reclamation is designed and implemented and assess the efficacy of the reclamation plan. It is not sufficient to propose developing and approving a reclamation plan at some later point during mining - which would make it impossible to compare reclamation efficacy to the proposed plan and further make it impossible to ensure that at all phases of mining there is an adequate financial surety in place that is capable of truly reclaiming the site.
Reclamation	Center for Biological Diversity	The reclamation plan should be based both on known disturbances planned for mining, and on proven reclamation techniques.
Reclamation	Great Basin Resource Watch	There must be a reclamation plan that includes how the mine will deal with the occurrence of leaks in the waste water containment system; mill tailings pond, heap/leach, and waste rock. The proposed mine will implore an acid leach process, so a detailed analysis of fate of drainage from tailings is warranted. MWMP tests of feed ore and gangue materials indicate the potential for very toxic drainage of the tails. According to the PoO the tailings will be lined with a HDPE geomembrane liner, which is needed for acid leached ore. The DEIS should estimate the lifetime of the liner and drainage capture system, and an analysis of the consequences of liner failure, which will occur eventually.
Reclamation	Great Basin Resource Watch	The mine plan calls for considerable processing facilities and an acid plant. BLM must analyze potential affects from years of operation at an industrial site where numerous spills are likely to occur. The DEIS should base the analysis on other similar processing facilities to determine the extent of chemicals released on site and the reclamation needed to detoxify the area. BLM should require a detailed plan for arresting spills and cleanup procedures.
Reclamation	Great Basin Resource Watch	A complete restoration plan for all aspects of the mine needs to be detailed. A plan for restoring the landscape to as close as possible to the pre-mining appearance should be developed. The current mine does call for backfilling of the pit, which GBRW supports.
Recreation	Theodore Roosevelt Conservation Partnership	The Theodore Roosevelt Conservation Partnership (TRCP) is a national non-profit conservation organization working to guarantee all Americans quality places to hunt and fish. The TRCP works with our 60 formal partners and represents over 97,500 individual members nationally and more than 1,800 individuals throughout the state of Nevada. Given the resulting impacts of development on public land throughout the West, and clear science regarding these impacts, the future management of federal public lands administered by the Bureau of Land Management within the Winnemucca District is of great interest to us, our partners, and Nevada sportsmen.
Recreation	Trout Unlimited	Trout Unlimited is a private non-profit national conservation organization that has more than 300,000 members and supporters nationwide dedicated to conserving, protecting and restoring North America's trout and salmon fisheries and their watersheds. Since 1959, TU has dedicated staff and volunteers working toward the protection of sensitive ecological systems necessary to support robust native and wild trout populations in their respective ranges. We recognize the value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes the planning actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations. In Nevada, TU plays a critical role in watershed conservation, restoration, and rehabilitation on public lands, particularly our forests. Staff and chapter members (the Sagebrush and Southern Nevada chapters) actively participate in projects with the Forest Service, communities and private landowners to maintain the important forest landscape vital to the

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		social and economic community in this area.
Socioeconomics	Public	I am not an environmentalist but I am a conservationist. I truly feel that this area should be conserved for the people of Humboldt County and Nevada. Huge amounts of money come to Humboldt County through outdoor enthusiasts such as hunters, fisherman, rockhounds, off road enthusiasts, and so forth. This magical area will be destroyed by this mine and along with it large amounts of revenue will be lost because of it.
Socioeconomics	Earthworks	Finally, we would like to highlight that at the public meeting, tribal leadership from the Fort McDermitt Paiute and Shoshone tribe welcomed vital employment and training opportunities the project would provide community members. Ensuring that Lithium Nevada keeps their word regarding these opportunities is of vital importance.
Stakeholder Involvement	Great Basin Resource Watch	Great Basin Resource Watch (GBRW), and the Progressive Leadership Alliance of Nevada (PLAN) has been in communication with Lithium Nevada on this project and we express our appreciation for their advanced disclosures of information.
Stakeholder Involvement	Great Basin Resource Watch	Public Engagement Process. A more thorough and transparent public engagement process is needed. The eplanning webpage for Thacker Pass was off and on dysfunctional during the time period given for public scoping comments, interfering with and limiting curtail opportunity for meaningful public input. These issues should have been taken into account and granted basis for additional public comment time. The basis for additional public comment time is even more apparent when considering the reaction and needs of community members at the scoping meeting on February 6, 2020 in Orovada. GBRW and PLAN attended the scoping meeting and witnessed the overwhelming mistrust of the process and information provided by Lithium Nevada, and lack of clarity about the project as expressed by a majority of the community members present. Many from the community felt that they were not given the tools or information needed
Stakeholder Involvement	Great Basin Resource Watch	In this way, a great number of community members were not given ample opportunity for input because their needs for understanding the project were not met. This in combination with the impinged timeframe for making comments has led to an insufficient public engagement process with the project thus far. Lithium Nevada's plan for an expedited permitting for Thacker Pass needs to be critically evaluated in light of this inadequacy in public process.
Stakeholder Involvement	Earthworks	Earthworks is a national nonprofit organization committed to protecting communities and the environment from the impacts of mining and energy development while seeking sustainable solutions. For nearly 30 years, we have fulfilled our mission by working with communities and grassroots groups to reform government policies, improve corporate practices, influence investment decisions and encourage responsible materials sourcing and consumption.
Stakeholder Involvement	Earthworks	Our comments are informed by our colleagues at Great Basin Resources Watch.
Stakeholder Involvement	Trout Unlimited	Trout Unlimited wishes to acknowledge lithium as a 'Critical Mineral' pursuant to Executive Order 13817, "A Federal Strategy to Ensure Secure and Reliable Supplies of Critical Minerals". Lithium is a vital component of Li-ion batteries necessary to renewable wind and solar energy development and EV cars - both important to climate change mitigation. As such, TU stresses the importance of this mineral while urging lithium be mined responsibly and in a manner that minimizes impacts to important fish and wildlife habitat. TU asserts that all current environmental safeguards must be followed for the purposes of development of this, or any, 'critical mineral'. Additionally, TU applauds Lithium Nevada for their engagement with local stakeholders during this initial scoping process and looks forward to continued, meaningful discussions.
Transportation	Nevada Department of Transportation	Provide a detailed account of vehicle and truck trips for both phases and future build-out conditions.
Transportation	Nevada Department of Transportation	Due to future build-out condition, increased number of trucks and vehicles on different routes could pose a safety issue. Please review the feasibility of posting additional signs to warn vehicles regarding the presence of a large number of trucks on these routes.

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Transportation	Nevada Department of Transportation	Please analyze the feasibility of posting additional signs on these routes regarding trucks carrying hazardous materials. In case of any incident of hazardous material spill within Nevada Department of Transportation's (NDOT) right-of-way, the department will need to be notified immediately for any assistance and/or traffic control.
Transportation	Nevada Department of Transportation	Please evaluate and analyze pavement cross-sections and cattle guards on routes because of additional vehicles and truck traffic due to the development and recommend any additional construction necessary. The developer may be responsible for any additional constructions or improvements on these routes because of the increased vehicles and truck operations.
Transportation	Nevada Department of Transportation	Please analyze ingress and egress from state routes onto the development to ensure that entrance and exit from and onto the routes are adequate for the vehicles and also for the truck traffic. Any upgrades on NDOT right-ofway will need to be permitted.
Transportation	Public	The EIS should require that cattle guards be put in on all roads used to access the mine site and the production well (so gates are not left open allowing stock into the mine site or onto the highway).
Transportation	Public	The EIS should require Lithium Nevada to mitigate the damage to paved roads caused by the extensive truck traffic.
Tribal Consultation	USEPA	It is important that formal government-to-government consultation take place early in the scoping phase of the project to ensure that all issues are adequately addressed in the Draft EIS. EPA recommends that the Draft EIS describes the process and outcome of government-to-government consultation between the BLM and each of the tribal governments within the project area, issues that were raised (if any), and how those issues were addressed.
Tribal Consultation	USEPA	The principles for interactions with tribal governments are outlined in an April 29, 1994 presidential memorandum and Executive Order 13175, dated November 6, 2000. Where feasible, efforts should be made to avoid or mitigate impacts to culturally significant sites. As a general resource, we recommend the document Tribal Consultation: Best Practices in Historic Preservation.3 (3 National Association of Tribal Historic Preservation Officers. May 2005. Tribal Consultation: Best Practices in Historic Preservation. http://www.nathpo.org/PDF/Tribal_Consultation.pdf.)
Tribal Consultation	USEPA	Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under the NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the NRHP. Section 106 of the NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Office/Tribal Historic Preservation Office (SHPO/THPO). Under NEPA, any impacts to tribal, cultural, or other treaty resources must be disclosed in the Draft EIS. Section 106 of the NHPA requires that federal agencies consider the effects of their actions on cultural resources, following the regulation at 36 CFR 800.
Tribal Consultation	USEPA	Executive Order 13007, "Indian Sacred Sites" (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet the NRHP criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. It is also important to note that sacred sites may not be identified solely in consulting with tribes located within geographic proximity of the project. Tribes located outside of the plan area may also have religiously significant ties to lands within the plan area and should, therefore, be included in the consultation process.
Tribal Consultation	USEPA	Address the existence of Indian sacred sites in the project areas, including seeps and springs that may be considered spiritual sites by regional tribal nations. Explain how the proposed action would address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how the BLM would ensure that the proposed action would avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. Provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites and development of a Cultural Resource Management Plan.
Tribal	Great Basin	In the American Indian Religious Freedom Act (AIRFA), Congress stated that "[i]t shall be the policy of the United States to protect and

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Consultation	Resource Watch	preserve for American Indians their inherent freedom to believe, express, and exercise the traditional religions." 42 USC § 1996 (1982). The BLM must analyze the cumulative impact to the ability of Native Americans to fully practice the traditional religions within the study area (at least as defined by the mines delineated on page two above). The analysis must include both known sacred and spiritual sites as well as traditional food and medicine gathering, important components of traditional practice.
Tribal Consultation	Great Basin Resource Watch	In the event that the project is within land outlined in the Treaty of Ruby Valley, between the United States and the Western Shoshone Nation, mineral rights were reserved and therefore continue to belong to the Western Shoshone Nation. The use of "gradual encroachment" is not a legally valid method of title transfer or extinguishment under existing federal law or recognized standards of human rights. From February 20 - March 10, 2006 the United Nations Committee for the Elimination of Racial Discrimination, issued a decision of an "Early Warning and Urgent Action Procedure" handed down to the United States of America. The decision pertains to US lands and therefore BLM or Forest Service public lands on which the project may in part be located. The relevant aspect of this decision is that the U.S. is to "freeze any plan to privatize Western Shoshone ancestral lands for transfer to multinational extractive industries and energy developers, and desist from all activities planned and/or conducted on the ancestral lands of Western Shoshone or in relation to their natural resources, which are being carried out without consultation with and despite protests of the Western Shoshone peoples." Thus, the project must seek consultation and permission from the Western Shoshone on their lands.
Vegetation including Wetlands	USFWS	we recommend that the EIS analyze and consider avoiding the disturbance footprint within SSS plant spp. occupied areas consistent to the maximum extent practicable
Vegetation including Wetlands	Public	13) The EIS must analyze the impact to jurisdictional wetlands (i.e. along the Quinn River in terms of pumping depletions and those impacts to wetlands along Thacker Creek with respect to pit dewatering.)
Visual Resources	Public	I am also very concerned about light pollution from this mine as well. Northern Nevada is well known for her dark skies. One only need look to the light pollution created by our gold operations such as Twin Creeks. Those who enjoy the incredible beauty of the night sky in this region easily can attest to this.
Visual Resources	NV Backcountry Hunters and Anglers	Are there any design features to reduce light pollution?
Visual Resources	Great Basin Resource Watch	All Visual Resource Impacts Must Be Fully Analyzed in the EIS and BLM Must Comply with Visual Management Plan Requirements. The Bureau of Land Management should maintain the Visual Resource Management Class Objectives that have been designated in the 2015 Record of Decision (ROD) and Approved Winnemucca BLM District Resource Management Plan. According to the RMP Final Environmental Impact Statement: "Visual Resources In general, all alternatives would involve actions that maintain or improve the quality of visual resources. In addition to relying on the visual resource contrast rating system to preserve the overall scenic quality of BLM-administered land, specific actions also maintain or improve visual resources involving air, water, flora, fauna, wildland fire, cultural resources, minerals, and recreation."
Visual Resources	Great Basin Resource Watch	The RMP's Record of Decision designated Visual Resource Management Classes for the entire BLM District. The BLM will manage visual resources on BLM lands under the following VRM class designations: • Class I – 418,201 acres; • Class II – 2,793,312 acres; • Class III - 3,073,906 acres; and • Class IV - 961,504 acres. Most of the Thacker Pass area is designated VRM Class II and some is VRM Class III. The two most impacted VRM Classes in the area are defined: Class II Objective: The existing character of the landscape is retained. The level of change to the characteristic landscape should be low. Changes can be seen but should not attract the attention of the casual viewer. Any changes must repeat the basic elements of form, line,

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		color, and texture found in the predominant natural features of the characteristic landscape. Class III Objective: The existing character of the landscape is partially retained. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape. Roughly 100,000 acres of VRM Class II lands would potentially be impacted by the Thacker Pass Project. In addition, tens of thousands of acres of VRM Class III lands could be impacted by the project.
Visual Resources	Great Basin Resource Watch	The Federal Lands Policy Management Act (FLPMA) provides for the management and protection of public lands, including their scenic quality. ROW grants on federal lands must contain terms and conditions that would minimize damage to scenic quality and aesthetic values (Section 505a). The BLM manages land under its jurisdiction according to the goals and policies outlined in their RMPs; the 2015 Winnemucca District RMP is the applicable plan for the Thacker Pass Project. The 2015 RMP identifies the components of the VRM system that apply to lands within the Winnemucca district. The VRM system provides a means to identify visual values, establish objectives through the RMP process for managing these values, and provide timely inputs into proposed surface-disturbing projects to ensure that these objectives are met. The Project area is within VRM Class II because of the natural features and settings within the area.
Visual Resources	Great Basin Resource Watch	The Visual Resource Inventory (VRI) is a process for determining visual (scenic) values in a management area at a specific point in time and follows the guidelines in BLM Manual Handbook H-8410-1, Visual Resource Inventory (BLM 1986b). Three primary components comprise a visual resource inventory: (1) scenic quality evaluation, (2) sensitivity level analysis, and (3) delineation of distance zones. Landscapes are then given a VRI class based on the inventory. BLM-administered lands are placed into one of four VRI classes, which represent the relative value of the visual resources. Classes I and II are the most valued; Class III represents a moderate value; and Class IV represents the least value (BLM 1986b). The Project is located primarily in VRI Class III (moderate value), while a portion of the proposed mine is in VRI Class IV (least value) (Otak, Inc. 2011). VRI classes do not direct management but provide information to the BLM when making management decisions. The VRI contains the baseline data for assessing impacts on the existing landscape character.
Visual Resources	Great Basin Resource Watch	Visual resources must be protected under the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et. seq.; 16 1. Section 102 (a)(8). States that "...the public lands be managed in a manner that will protect the quality of the...scenic...values " 2. Section 103 (c). Identifies "scenic values" as one of the resources for which public land should be managed. 3. Section 201 (a). States that "The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources and other values (including...scenic values). " 4. Section 505 (a). Requires that "Each right-of-way shall contain terms and conditions which will... minimize damage to the scenic and esthetic values " B. National Environmental Policy Act of 1969, 43 U.S.C. 4321 et. seq.; 1. Section 101 (b). Requires measures be taken to " ...assure for all American esthetically pleasing surroundings " 2. Section 102. Requires agencies to "Utilize a systematic, interdisciplinary approach which will ensure the integrated use of...Environmental Design Arts in the planning and decision making "
Visual Resources	Great Basin Resource Watch	Both NEPA and FLPMA recommend that Visual Resource Management be decided on the RMP level. On a cumulative level, the Thacker Pass lithium mine would have distant visual impacts that must be thoroughly analyzed in the EIS.
Visual Resources	Great Basin Resource Watch	Full 90-Day Comment Period Required for RMP Amendments. To amend the RMP to accommodate the Thacker Pass lithium mine, BLM must follow NEPA implementing regulations. 4 These include, but are not limited to, providing a full 90-day public comment for the RMP amendment, per 43 CFR §1610.2(e): "Ninety days shall be provided for review of the draft plan and draft environmental impact statement."
Visual Resources	Great Basin Resource Watch	Review of VRM Classes. The following contrast rating factors should be considered for the review of the Thacker Pass Project, as specified in BLM Manual 8431:Distance Zones - The contrast created by a project usually is less as viewing distance increases. Angle of Observation - The apparent size of a project is directly related to the angle between the viewer's line-of-sight and the slope upon which the project is to take

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		place. As this angle nears 90 degrees (vertical and horizontal), the maximum area is viewable. Length of Viewing Time - If the viewer has only a brief glimpse of the project, the contrast may not be of great concern. If, however, the project is subject to view for a long period, as from an overlook, the contrast may be very significant.Relative Size or Scale - The contrast created by the project is directly related to its size and scale as compared to the surroundings in which it is placed.Season of Use - Contrast ratings should consider the physical conditions that exist during the heaviest or most critical visitor use season, such as snow cover and tree defoliation during the winter, leaf color in the fall, and lush vegetation and flowering in the spring.Light Conditions and Atmospheric Conditions - The amount of contrast can be substantially affected by the light conditions and atmospheric conditions. The direction and angle of lighting can affect color intensity, reflection, shadow, form, texture, and many other visual aspects of the landscape. Light conditions must be a consideration in contrast ratings. Atmospheric conditions can affect contrast.Recovery Time - The amount of time required for successful revegetation should be considered. Those conducting contrast rating should verify the probability and timing of vegetative recovery.Spatial Relationships - The relationship of the proposed project with surrounding features.Motion – traffic associated with the mine.
Visual Resources	Great Basin Resource Watch	Distance Zone Delineation. Within the Visual Resource Inventory process, distance zones are assigned based on the distance of lands from places where people are known to be present on a regular basis, such as highways, waterways, trails, or other key locations. They include the following: Foreground-middle ground – This zone includes visible areas from 0 to 5 mi. Background – This zone includes visible areas from 5 to 15 mi. Seldom seen – This zone includes lands visible beyond 15 mi or lands hidden from view from key locations. The effects of distance are highly dependent on the size and other characteristics of the facility and the landscape, and must be incorporated into the contrast and impact analyses and mitigation efforts on a case-by-case basis. Nearly all distance zones within the Thacker Pass area would be impacted by the proposed Project and should be analyzed in the Draft EIS.
Visual Resources	Great Basin Resource Watch	Key Observation Point (KOP) Simulations:. The DEIS should include a full range of Key Observation Point simulations. These KOP simulations should include close-up views from access roads, distant views from peaks and prominent ridges in the Montana and Double H Mountains and should also include night lighting simulations: KOP Simulations should show the entire disturbance on 5,500 acres; KOP Simulations should show large open pits and contrasts from different times of day; KOP Simulations should show new roads associated with continued exploration.; KOP Simulations should show illuminated facilities at night- time from close and distant locations
Visual Resources	Great Basin Resource Watch	Downgrading the VRM Class. Will the BLM downgrade the visual classes in the RMP amendment? The Proposed Action and each alternative include amending the Visual Resource Management (VRM) Class II and Class III objectives in the 2015 Winnemucca RMP district to a Visual Resource Management Class IV objective, which will allow for management activities that require major modifications of the existing landscape character. In 2014, the Bureau of Land Management, Las Vegas Field Office downgraded the VRM Class in their district to approve the Silver State South Solar Project which they concluded would have major impacts to VRM Classes II and III.
Wastes, Hazardous or Solid, Public Safety	Public	How is the mine planning to handle any of the waste that is produced, including lithium itself?
Wastes, Hazardous or Solid, Public Safety	Public	As a larger question, when lithium batteries are finished, what is the plan to recycle these products?
Wastes, Hazardous or Solid, Public Safety	Public	I realize we need an alternative to fossil fuels, but before we go charging down another polluting path, shouldn't we consider the total effects of what we are doing?

Issue Category	Organization	Comment*
Wastes, Hazardous or Solid, Public Safety	Public	If the project didn't involve sulfur processing, it probably would not be feasible. BLM should analyze the feasibility of the project if it did not involve importing sulfur; and the feasibility of the project if BLM mandated all imported sulfur be captured and properly disposed of at another location. All the impacts of importing this volume of sulfur must be analyzed both to the environment and the local community. BLM should mandate that all imported sulfur waste or contaminates thereof be removed and disposed off-site. If removing waste containing sulfur is not feasible the entire project should be denied.
Wastes, Hazardous or Solid, Public Safety	Public	Impacts to the Environment and Community: Lithium Nevada is proposing to ship large volumes of Sulfur via train to Winnemucca then via semi-trucks to the mine site. Lithium Nevada plans to then construct a massive incinerator where nearly 1,000 tons of sulfur will be burned every day. Much of the resulting toxic and greenhouse gas (sulfur dioxide) will be captured and converted to sulfuric acid (see plan of operation page 51). However, the Company has not identified how much, if any, will be released into the atmosphere. The Plan of Operation merely says sulfur dioxide emissions will be "reduced" - which indicates some will be emitted and does not quantify emissions. "Criteria air pollutants that will be released as tail gas from the sulfuric acid plant will be scrubbed with a soda ash or similar solution, reducing SO2 [Sulfur Dioxide] and acid mist emissions." (POO page 73) The plan of Operations identifies the following elements that will be imported to the mine site on an annual basis (POO page 52) Limestone 169,036 tons, Quicklime 126,204 tons, Soda Ash 86,343 tons, Molten Sulfur 340,247 tons, SNF Hyperfloc AF-307 144 tons, SNF Hyperfloc CP-624 72 tons, Caustic Soda 145,668 tons, Potassium Chloride 4,712 tons, Aluminum Powder 0.9 tons. These are astronomical quantities of chemicals that will be imported into the community. What is unclear is where all these chemicals will end up.
Wastes, Hazardous or Solid, Public Safety	Public	a) BLM should require Lithium Nevada to provide a budget in the EIS showing where each of these chemicals/elements will be at the end of each year, and what form they will be in. Specifically including but not limited to 1) how much will be released into the atmosphere 2) how much will remain in the tailings pile 3) how much will be exported in the form of finished products 4) how much will be exported in the form of waste 5) how much will remain elsewhere (and if so where). 6) how much will remain outside of containment and where it will have increased impacts on the environment. b) BLM should make the above budget mandatory for all sulfur compounds in the budget and require the plant to shut down if stated pollution levels are exceeded. For example if company represents that sulfur dioxide emissions will be near zero, then the BLM should mandate that these emissions be near zero in approving the project. However, if the plant emits sulfur dioxide or similar contaminants, then the BLM must analyze the volume and impacts and condition the permits according. c) The EIS must thoroughly examine the impacts of air and other discharges on the local environment (i.e. plants, livestock, Sage Grouse and trout) as well as the affected community. 6) The EIS should mandate all imported sulfur compounds be contained and monitored indefinitely. Under no circumstances should imported sulfur containing tailings be placed back into the pit for backfill where they could contaminate groundwater.
Wastes, Hazardous or Solid, Public Safety	Public	BLM should mandate Lithium Nevada; a) Monitor the tailings pile and all other imported sulfur containing waste, and stored compounds daily with a multitude of sensors to detect if toxic forms of sulfur are being created, and that data should be publicly available on a daily basis. b) All people who live or work in the area including ourselves should be placed on an emergency alert call list and contacted immediately in the event; I) the tailing pile begins releasing toxic gas 2) There is an uncontained toxic runoff (like a flash flood event), where livestock might drink toxins, 3) or toxins flow toward private lands, via Crowley Creek, Pole Creek or Thacker Creek. 4) Any mine accident or explosion that releases toxic gas, or runoff. 5) At any point air quality standards are violated c) All sulfur transport vehicles should be required to be totally covered (including but not limited to vehicles hauling tailings).
Wastes, Hazardous or Solid, Public Safety	Public	7) BLM should require that Lithium Nevada prove they have secured sufficient funding to complete construction of phase 1 before any construction is allowed to start. According to newspaper reports the mine will cost 1.3 billion dollars, yet Lithium Americas financial statements indicate they may only have about 10% of that amount. BLM should further require that sufficient costs be expended to ensure catastrophic plant malfunctions will not occur. About 1,000 tons of molten sulfur will be burned every day; producing 2,900 tons of sulfuric acid (see POO page 51). As part of this process, massive quantities of sulfur dioxide will be produced. A separate process will produce quantities of contained chlorine gas for lithium extraction (the POO does not say how much) (see POO pg. 49). Chlorine gas is deadly gas. Chlorine gas was historically used as a weapon of war (now banned by the Geneva Convention). A 2004 train derailment in Texas released

Issue Category	Organization	Comment*
		Chlorine gas which killed 3 people and sickened 50 people, some with chronic debilitating illnesses. Two of the dead were killed in their homes about a mile from the accident site. A plant fire or other malfunction has the potential to release massive quantities of poison gas, and toxic runoff. A major plant fire or malfunction will likely result in substantial loss of human life.
Wastes, Hazardous or Solid, Public Safety	Public	8) The EIS should include modeling to show the movement of toxic plumes that would result from various disaster scenarios including but not limited to a)The entire stored content of molten sulfur burning (13,454 tons). b) A breakage releasing gas and a reaction producing chlorine gas with all available stored chemicals related to the lithium bath.
Wastes, Hazardous or Solid, Public Safety	Public	9) The EIS should include a total list and total volume of all chemicals stored (including gasses) and including those stored briefly for other chemical processes. The text mentions the following gasses will be stored; Hydrogen Gas (highly explosive); Chlorine Gas (highly toxic); Hydrogen Sulfide (Highly Toxic). Yet nowhere does it say how much.
Wastes, Hazardous or Solid, Public Safety	Public	10) The EIS should analyze and provide a total list of all chemicals/elements stored or produced at the mine site that pose a risk to human health and the environment. The EIS should further provide a list of chemicals that could be produced unintentionally through accidental cross contamination, or through reactions with the soil, water or bacteria, that pose a risk to human health or the environment.
Wastes, Hazardous or Solid, Public Safety	Public	11) The EIS should further provide a running total of all chemicals and elements brought to the mine site that never leaves, and analyze what the cumulative impact will be on the plants, wildlife, groundwater, long term soil chemistry, and community (i.e. will it be a stinking pile of sulfur waste indefinitely.)
Wastes, Hazardous or Solid, Public Safety	Public	12) It appears that the main source of Sulfur for the plant will be industrial waste from oil refineries. EIS should mandate every load of sulfur (and other reaction elements/chemicals) entering the plant be tested for impurities that could cause unintended chemical reactions, or environmental contamination (i.e. lead).
Wastes, Hazardous or Solid, Public Safety	Public	The EIS should calculate how far around the plant the smell of various sulfur compounds will carry as well as the around the clock noise of the entire project. The EIS should require affected property owners be compensated for the devaluation of their property due to the noise and/or smell of the project.
Wastes, Hazardous or Solid, Public Safety	Center for Biological Diversity	The environmental analysis should include reasonably probable effluents and byproducts resulting from production of any lithium material proposed (or reasonably foreseeable) (e.g. lithium hydroxide monohydrate, lithium sulfide, lithium metal, and solid-state lithium materials).
Wastes, Hazardous or Solid, Public Safety	Center for Biological Diversity	The environmental analysis should include both air and water quality impacts reasonably resulting from sulfuric acid production and storage/use. This includes both air quality and surface and ground water quality impacted from anticipated discharges and from accidental/unplanned discharge. Neutralization techniques are not necessarily complete/efficient - requiring that the environmental analysis include impacts from the failure to fully neutralize discharges containing neutralized sulfuric acid.
Wastes, Hazardous or Solid, Public Safety	Center for Biological Diversity	The Run-of-Mine (ROM) stockpile should be reviewed for its ongoing potential to yield contaminants to surface or ground waters. An analysis should include employing a full underliner and seepage collection system. The possible impacts to the mine plan and human health and the environment should include the possibility that pit operations require the pile to increase to a larger size than proposed or materials to persist in the piles for longer than anticipated prior to backfill.

Issue Category	Organization	Comment*
Wastes, Hazardous or Solid, Public Safety	Center for Biological Diversity	There should be a thorough analysis and discussion of the potential to form acid mine drainage or other acidic or basic effluent that degrades or could reasonably degrade surface or ground water quality. This analysis should consider different configurations (and timing) of pit backfill - including volumes and the chemistry of the backfilled materials (relative to the chemistry of the potentially fluctuating pit water.
Wastes, Hazardous or Solid, Public Safety	Center for Biological Diversity	The waste rock piles must not degrade human health or the environment. Potential contaminants and the potential for acid mine or other drainage underscore the need to fully assess and evaluate the potential for contaminated leachate from surface or pit deposited materials. Thorough geochemical analysis of each type of waste rock is required. The number of samples should reflect both rock types and relative amounts (i.e. more waste rock, more samples).
Wastes, Hazardous or Solid, Public Safety	Center for Biological Diversity	The Clay Tailings Filter Stack (CTFS) poses a variety of predictable and unknown threats to human health and the environment. The clay tailings, neutralization solids, and various salts generated during lithium processing will contain significant contaminants that, if released, are likely to significantly impact human health and the environment. The environmental analysis should consider the full range of possible impacts to air and water quality and the impacts from failures in tailings processing prior to placement, wetting or other failure once placed, etc.
Wastes, Hazardous or Solid, Public Safety	Great Basin Resource Watch	Analysis and mitigation of other gaseous emissions (such as sulfur oxides, nitrogen oxides, etc.) from all mine facilities and vehicles is needed. Particularly, since there will be considerable industrialization and the sulfuric acid factory air emissions and odor affects must be analyzed in depth.
Water Resources	USEPA	Provide a complete hydrologic characterization of the project vicinity and the cumulative impact area and describe all existing water resources and baseline groundwater and surface water quality, quantity, and flow regimes. Summarize area groundwater and surface water adjudications and the existence of any federal reserved water rights. Information on groundwater properties and groundwater/surface water connections (e.g., springs, seeps, interception of the water table proposed mine pits, etc.) are needed to identify and assess potential impacts to water resources and risks to receptors of contaminants. This baseline information is critical to understanding the project's potential environmental impacts and should be described in the Draft EIS rather than included by reference.
Water Resources	USEPA	Describe the life-of-mine operational period, and post-mining drainage patterns across the project area and how drainage patterns would change (including post-closure drainage patterns) under each alternative. Include hydrologic and topographic maps of the project area and cumulative impact area. Identify any components of the proposed project that would fall within 25- and I00-year floodplains. Discuss the potential for runoff to transport sediment or contaminants from disturbed areas at the mine to any surface waters, as well as any potential receptors outside the mine boundaries.
Water Resources	USEPA	Discuss all direct, indirect, and cumulative impacts to surface water and groundwater quality from the proposed project and alternatives both during construction, operations, closure, post-closure, and exploration activities. Describe all potential project discharges, seepage, temporary ponding, diversions, and groundwater pumping, as well as the potential effects of these activities on water rights, quality, flow, beneficial uses, and wildlife.
Water Resources	USEPA	Discuss the potential for contamination of meteoric water that contacts waste rock, pit wall rock, stockpiles, roads, and other mine facilities. Analyze the fate and transport of any such water and discuss the possibility for wildlife and avian exposure to mine-influenced waters;
Water Resources	USEPA	Discuss the potential for, and effects of, movement of any contaminated surface water to the subsurface, including through the pit bottom and through land subsidence fissures;
Water Resources	USEPA	Describe the projected chemical characterization of water in open ponds that would be located at the site. Describe the potential for such waters to enter external surface water features;

Issue Category	Organization	Comment*
Water Resources	USEPA	Describe the designs of the proposed run-on/run-off channels, seepage collection systems, process and sedimentation ponds, pump back systems, and any necessary treatment or disposal of these solutions. Depict these facilities on a map and describe all required monitoring/maintenance necessary to ensure proper functioning;
Water Resources	USEPA	Describe all other mitigation measures to prevent contamination of water and sediment;
Water Resources	USEPA	Discuss how accidental releases of hazardous materials would be handled;
Water Resources	USEPA	Identify the potential impacts of failure of the solution containment systems, methods for discovering such failures, and the degree to which impacts would be reversible; and
Water Resources	USEPA	Explain the models and modeling parameters used to predict future groundwater levels (rebound levels) that will incorporate additional surface water/precipitation that lands in the subsidence zone and would thus infiltrate into the groundwater system(s) in perpetuity.
Water Resources	USEPA	Provide an estimate of the quantity of water the project will require during construction, operations, and exploration activities. Identify the source of this water, the affected groundwater basin(s) to be used, and the potential effects on other water users, including users in the Quinn River Valley. In the event that that the project site's wells go dry or the pumping water level declines below a depth of 500 feet below ground surface, identify the source that will be used to truck water to the project.
Water Resources	USEPA	Include hydrogeologic modeling and graphically depict the cone of depression likely to result from water supply wellfield pumping. This may include a groundwater flow model with a graphical depiction of groundwater drawdown resulting from project water use. For drawdown isopleths include a graphical representation up to an interval of 5-feet of groundwater drawdown that is likely to result from water supply use from the wellfield pumping. Discuss potential impacts to springs and creeks within and outside of the Project Area.
Water Resources	USEPA	Include a fate and transport model of seepage from mining facilities. Include predicted seepage volumes and rates during all phases of mining operations, and discuss how predicted seepage volumes may impact surface water.
Water Resources	USEPA	Identify direct, indirect, and cumulative impacts to surface water flow, water supply wells, wetlands, springs and seeps, vegetation, wildlife, and other groundwater-dependent resources as a result of groundwater pumping associated with the proposed project. Describe and graphically depict post-closure groundwater elevation recovery, including an analysis of the Quinn River Valley.
Water Resources	USEPA	We EPA recommend that the BLM consider the impacts of changing precipitation patterns on the project as pait of its analysis of impacts to water resources, and commit to designing all erosion control, bypass and diversion features to withstand longer precipitation frequency/duration models. Government agencies, like the Federal Energy Regulatory Commission and the U.S. Army Corps of Engineers, are increasingly relying on 200-year or 500-year levels to simulate rainfall amounts and intensity to standardize dam safety and levee design. In addition, the U.S. Geological Survey is testing 500-year levels on various soils to estimate infiltration/runoff rates and reduce erosion risks at hazardous waste dumps.
Water Resources	USEPA	In the Draft EIS, identify which design considerations would be needed to accommodate future anticipated effects from storms of increased intensity and severity and consider upsizing the stormwater management channels and retention systems beyond the 100-year, 24-hour stormwater event.
Water Resources	USEPA	The Plan of Operations (PoO) states that potential exists for a pit lake to form in 2055 (p. 30). Because this information is critical to determining if significant impacts may result from mining operations, the EPA recommends that the BLM disclose and discuss the data and assumptions used to support this conclusion and the methodology or established protocols used, and uncertainty associated with groundwater data.
Water Resources	USEPA	Generally, exploratory or "development" boreholes need to be completed appropriately (e.g. appropriate diameter, left open for a period sufficient to equilibrate with the hydrostratigraphic unit, etc.) and instrumented with piezometers to provide an accurate description of groundwater levels. Groundwater monitoring wells completed below the proposed pit bottom and screened across the pit excavation area would provide the most accurate information about groundwater levels in the pit area. Ideally these monitoring locations will be monitored for at least a full water year (October 1 to September 30) to determine whether terminal lakes or through-flow systems would develop.

Issue Category	Organization	Comment*
Water Resources	USEPA	Should groundwater be found, discuss the need, location and schedule for a groundwater monitoring program before mining proceeds. Describe the uncertainty associated with the delineation of the potentiometric surface during mining and post-closure. Then, if further hydrogeological modeling or monitoring demonstrates that a perpetual sink or through-flow may develop, assess and describe potential impacts to groundwater, surface waters, and wildlife following mine closure and post-closure.
Water Resources	USEPA	Include a thorough geochemical analysis of pit wall and groundwater chemistries, compliance with water quality standards, as well as a comprehensive ecological risk assessment.
Water Resources	USEPA	Provide past and current monitoring results and trends for surface water and groundwater quality in the proposed mine area. Discuss all ongoing and proposed monitoring plans and their relevance in predicting the potential for, and protection against, contaminated drainage from mining activities.
Water Resources	USEPA	Describe water quality and quantity monitoring and reporting procedures, including controlling contact between waste rock and storage materials and surface or meteoric waters (e.g., maintenance of run on/runoff channels, liners, underdrains, seepage collection areas, growth medium covers, ponding on top of facilities). Identify all monitoring locations for surface water, ponded water, and collected seepage; groundwater monitoring wells; and points of compliance on-site. Discuss monitoring frequencies, screening intervals, and parameters to be monitored during all phases of the project, including post-closure.
Water Resources	USEPA	The EPA recommends that the Draft EIS identify all permits that apply, including beneficial use and state-adopted, EPA-approved, and water quality standards, and discuss each alternative's compliance with such standards and permits. Provide the most up-to-date information with regard to any remediation activities requested or required by the Nevada Division of Environmental Protection, the BLM or other applicable regulating body pertaining to water quality and quantity management.
Water Resources	USEPA	Discuss the applicability of the NDEP Multi-Sector General Permit for Stormwater Discharges associated With Industrial Activities to this project. Include a storm water pollution prevention plan and discuss specific mitigation measures that may be necessary during operations, closure, and post-closure. Describe the measures that would be employed to ensure the mine achieves and maintains a zero discharge status to surface waters and groundwater for all phases of the project.
Water Resources	USEPA	Even if required permits, are not obtained during development of the Draft EIS, the EPA recommends that the analysis include a description of anticipated or reasonably foreseeable permits requirements and how such permit requirements would be protective of human health and the environment. For example, include details in the Draft EIS about the Water Pollution Control Permit. Explain how the likely requirements would be met. If meeting permit requirements would still result in significant impacts to the environment, additional measures should be considered to mitigate remaining impacts.
Water Resources	USEPA	Identify any sustainable design and operation measures that could minimize water pollutants and provide an estimate of the reductions if these measures were implemented. Clearly indicate whether these measures would be required. For each measure, discuss its permanence, verifiability and enforceability.
Water Resources	USEPA	Confirm with the U.S. Army Corps of Engineers that there are no jurisdictional waters requiring a Clean Water Act Section 404 permit for discharge of dredged or fill material into waters of the United States, including wetlands and other "special aquatic sites." If potential impacts to waters of the U.S. are found, specify the acreage and channel lengths, habitat types, values, and functions of these waters. Describe the potential environmental impacts and discuss alternatives to avoid or minimize those discharges, and measures to mitigate potential impacts.
Water Resources	USEPA	Accurate characterization of the Thacker Pass Project geochemistry is critical for properly identifying the potential impacts and addressing them through facility design and mitigation measures. Discuss the mineralogy and acid generation/neutralization potential of waste rock, spent ore, and pit walls at the site. Describe the static and, if appropriate, kinetic tests that have been conducted on ore and waste rock and provide the results for each test. Include cross-sections showing locations of static and/or kinetic test samples and describe and discuss their representativeness.

Issue Category	Organization	Comment*
Water Resources	USEPA	Describe the quality of waters at Thacker Pass and nearby mining sites, particularly older mines, which may be used to predict future acid generation at the proposed project site. Discuss whether there are adequate materials available to neutralize all acid-generating waste rock that might occur and identify a source of neutralizing material on- or off-site should it be deemed necessary in the future. Describe and commit to measures to ensure isolation of potentially acid generating waste rock, prevention of acid generation from mine waste and pit walls, and any additional mitigation measures that may be necessary should prevention measures fail.
Water Resources	USEPA	In addition to site characterization, describe how waste rock will be handled, stored, disposed of, and reclaimed at the mine. Discuss facility designs and control measures that would be implemented to ensure against leaching and release of contaminants under both acidic and non-acidic conditions, and degradation of surface water and groundwater quality. Support the discussion with both geochemical testing data and on-site current or historic monitoring data (e.g., recent monitoring results, pan evaporation rates, etc.).
Water Resources	USEPA	Identify any non-jurisdictional wetland or riparian habitats, including seeps or springs, adjacent to or within the project area. Describe how these waters will be affected by operations, the extent to which the functions of these waters have been degraded and the extent to which each action alternative might further degrade or contribute to an improvement in the quality of these resources.
Water Resources	USEPA	Discuss measures to avoid, minimize, and mitigate losses, and address strategies for improving the quality and quantity of these areas. If important habitat would be adversely affected by the proposed project, we recommend that the Draft EIS include a detailed mitigation plan for habitat replacement, identifying: Acreage and habitat type that would be created or restored; Resources needed to maintain the mitigation area; The revegetation plans, including the numbers and age of each species to be planted; Maintenance and monitoring plans, including performance standards to determine mitigation success; The size and location of mitigation zones; The parties that would be ultimately responsible for the plan's success; and Contingency plans that would be implemented if the original plan fails.
Water Resources	Public	I am also greatly disturbed by the ground water disruption that will definitely occur. The loss of the aquifers that charge the springs to Thacker pond, one of the few fishing areas that we have, will be destroyed. These are the same groundwater sources that support the water that irrigates the agricultural fields of Kings River. I know this first hand from my native West Virginia.
Water Resources	NDEP-BSDW	Please be aware that if the proposed facility will have 15 or more service connections or serve 25 or more people at least 60 days out of a year, the facility is required to become permitted as a public drinking water system. Providing bottle water to the workforce does not relieve a facility of the requirement of becoming permitted as a public drinking water system. Plans and specifications for the drinking water system are required to be submitted to the Nevada Division of Environmental Protection (NDEP), Bureau of Safe Drinking Water (BSDW) for review and approval prior to construction of any drinking water system infrastructure.
Water Resources	Nevada Division of Water Resources	All Nevada water laws must receive full compliance.
Water Resources	Nevada Division of Water Resources	All water used on a project must be permitted by the State Engineer's Office.
Water Resources	Nevada Division of Water Resources	All waters of the State belong to the public and may be appropriated for beneficial use pursuant to the provisions of Nevada Revised Statutes (NRS) Chapters 533 and 534 and not otherwise.
Water Resources	Nevada Division of Water Resources	The State Engineer must permit all water used on the described project.

Issue Category	Organization	Comment*
Water Resources	Nevada Division of Water Resources	Water diversions from any surface source must comply with the permitting provisions of Nevada Revised Statutes (NRS) Chapter 533.
Water Resources	Nevada Division of Water Resources	Water diversions from any underground source must comply with the permitting provisions of NRS 533 and 534.
Water Resources	Nevada Division of Water Resources	Any transfer of water rights may be submitted to the State Engineers office as per NRS 533.384. The State Engineer is authorized and is responsible for maintaining water right files and accompanying documents as per NRS Chapters 111, 240, 375, 532, 533 and 534.
Water Resources	Nevada Division of Water Resources	No use of any water required in support of this project, from any source, is allowed without the benefit of a permit or waiver issued by the Nevada Division of Water Resources.
Water Resources	Nevada Division of Water Resources	Any water developments constructed and utilized for a beneficial use whether surface or underground must be done so incompliance with the referenced chapters of the NRS.
Water Resources	Nevada Division of Water Resources	Ensure that any water used on a project for any use shall be provided by an established utility or under permit or temporary change application or waiver issued by the State Engineer's Office with a manner of use acceptable for suggested projects water needs.
Water Resources	Nevada Division of Water Resources	Water wells must be permitted, Monitor wells require a Waiver from the State Engineer's Office, and boreholes must be plugged within sixty (60) days after being drilled as required by NAC 534.4371. For the plugging of boreholes, all boreholes require a 20-foot surface plug by placing concrete grout, cement grout or neat cement from 20 feet below the surface to the surface, in addition to all other plugging requirements mandated by NAC 534.4371.
Water Resources	Nevada Division of Water Resources	Any drill holes (water or monitor wells or boreholes) that may be located on either acquired or transferred lands are ultimately the responsibility of the owner of the property and must be plugged and abandoned as required in Chapter 534 of the Nevada Administrative Code.
Water Resources	Nevada Division of Water Resources	If artesian water is encountered in any well or borehole it shall be controlled as required in NRS § 534.060(3). Abandoned wells need to be reported to the State Engineer's Office and must be plugged as required in NAC Chapter 534.
Water Resources	Nevada Division of Water Resources	Orphaned wells must be plugged and abandoned as required in NAC Chapter 534.
Water Resources	Nevada Division of Water Resources	Construction and abandonment of any well, monitoring well, borehole, instrumentation borehole, or any other type of borehole, including but not limited to any "shot" holes, must comply with the provisions of Nevada Administrative Code (NAC) Chapter 534 (Regulations for Water Well and Related Drilling).
Water Resources	Nevada Division of Water Resources	All water sources used for exploration drilling, dust control, road construction, or for any other purpose must be permitted by the State Engineer.

Issue Category	Organization	Comment*
Water Resources	Nevada Division of Water Resources	Dewatering for alleviation of hazards caused by the rise of ground water from secondary recharge is provided by the provisions of NRS 534.025 and NRS 534.050(2).
Water Resources	Nevada Division of Water Resources	Any person proposing to construct a dam, reconstruction or alteration of old structures in this state shall, before beginning construction, obtain from the State Engineer a permit to appropriate, store and use the water to be impounded by or diverted by the dam. If the proposed dam is or will be 20 feet or more in height, measured from the downstream toe to the crest of the dam, or is less than 20 feet in height and will impound more than 20 acre-feet of water, must submit to the State Engineer in triplicate plans and specifications thereof for his approval in accordance with Nevada Revised Statue Chapter 535 and Nevada Administrative Code Chapter 535 prior to construction is to begin.
Water Resources	Public	First I want to say that lithium mining in the "lithium triangle" has garnered protests because of water contamination and the effects on the people of that area in South America. Lots of water is needed for the process of lithium mining and in this area the effects of the mining has created real problems in terms of water pollution.
Water Resources	Public	I read the two articles by the Sierra Nevada Ally. They interviewed the scientists involved in the Thacker Mine proposal. I do understand that the people in charge do want to make this a carbon neutral mine, in terms of being close to the production of lithium batteries as well as using water on site for lithium processing. The plan as I understand it it to create sulfuric acid to separate the lithium from the clay matrix in evaporation ponds. The article states that in year 25 of the 50 year mine plan they hit the water table.
Water Resources	Public	What happens to the water that becomes waste water after production, and how is it kept from contaminating the aquifer?
Water Resources	Public	What happens when the mine hits the water table in year 25?
Water Resources	Public	How does this affect the people who live in the area of the mine, and will it affect their drinking water and land for grazing. Will this cause dewatering and make the area more arid?
Water Resources	Coalition for NV Wildlife	Ground water models indicate dewatering activities could have major adverse impacts to springs and meadows to the north that sage grouse depend upon. While spring flows could be partially mitigated by the construction of guzzlers, there is no mitigation for the loss of meadow habitat that are vital to sage grouse broods. The Montana Mountains presently host some of the highest breeding densities of sage grouse in the state and the west; protection of this dwindling resource is of the highest priority. Limiting the depth and/or northern limits of mining to eliminate or absolutely minimize the need for dewatering should be considered.
Water Resources	Coalition for NV Wildlife	An additional potential impact from dewatering is the effects on stream flows of Crowley, Pole, and Rock creeks which host Lahontan Cutthroat trout. Connectivity of these streams in spring runoff is vital and must be maintained.
Water Resources	Coalition for NV Wildlife	All exploration drill holes should be abandoned in accordance with State standards to minimize the potential of ground water cross contamination.
Water Resources	USFWS	A presentation provided to the Cooperating Agencies that I participated in had indicated that by way of modeling water resources in the project area (and outside of the project area) that water would be depleted (e.g. springs in the Montana Mountains were identified as being impacted). However, the presenter/consultant indicated that those waters would recover/recharge post project based on their modeling exercise. Notwithstanding, ongoing monitoring in key areas are not identified and/or currently planned for the duration of the project. The RFWO recommends that "on the ground" monitoring stations be set up in representative/key locations which will be sufficient to adequately monitor both lentic and lotic areas for the duration of the project. This will provide valuable information (outside of modeling) as to the extent of water depletion to the ecosystem to further protections to Threatened &Endangered/Special Status Species
Water Resources	Friends of Animals	This type of project is extremely water intensive, involves significant construction and disturbance, and entails the use of toxic chemicals that could contaminate the surrounding environment.

Issue Category	Organization	Comment*
Water Resources	Public	The above proposed project needs a more expansive and in-depth environmental assessment as to the future effects on the local groundwater tables. The proposed mine plans to use EXCESSIVE amounts of local waters to implement their extraction processes. This could potentially disturb the local ecosystems in a very negative manner with consequences extending far into future generations. Water, not lithium, is Nevada's most precious and endangered resource. All of our lives here depend upon it. Please consider the long-term effects of this mine in contrast to rhe immediate economic benefits. Thank you.
Water Resources	Western Watersheds Project	The DEIS Must Fully Review Impacts to Federal Reserved Water Rights and Withdrawn Lands, and Prevent Adverse Impacts to Those Resources The company's Plan of Operations acknowledges that the dewatering of the aquifer and substantial lowering of the water table may cause loss and/or elimination of springs and streams, which would violate BLM's duties to protect these resources under FLPMA and Presidential Order. Water flows in springs and waterholes on public land in the West are reserved for public use by Public Water Reserve # 107 ("PWR 107"), which was created by Executive Order by President Calvin Coolidge in 1926. The reservation of federal water rights also included a withdrawal from entry of public lands ¼ mile around each spring/waterhole. PWR 107 provides: [I]t is hereby ordered that every smallest legal subdivision of public land surveys which is vacant, unappropriated, unreserved public land and contains a spring or water hole, and all land within one quarter of a mile of every spring or water hole located on unsurveyed public land, be, and the same is hereby, withdrawn from settlement, location, sale, or entry, and reserved for public use in accordance with the provisions of Section 10 of the Act of December 29, 1916.
Water Resources	Western Watersheds Project	Executive Order of Apr. 17, 1926, previously codified at 43 C.F.R. § 292.1 (1938). See also GENERAL LAND OFFICE, DEPARTMENT OF INTERIOR, CIRCULAR 1066, 51 I.D. 457-58 (1926) ("[t]he above order [PWR #107] was designed to preserve for general public use and benefit unreserved public lands containing water holes or other bodies of water needed or used by the public for watering purposes."). 1926 I.D. LEXIS 45.
Water Resources	Western Watersheds Project	The 1926 Executive Order and withdrawal were promulgated under the authority of Section 10 of the Stock-Raising Homestead Act of Dec. 29, 1916, 39 Stat. 862, 865, 43 U.S.C. § 300 (SRHA), which provided that withdrawn "lands containing water holes or other bodies of water needed or used by the public for watering purposes … shall, while so reserved, be kept and held open to the public use for such purposes…." Although the Stock-Raising Homestead Act and the underlying authority of the President to withdraw such lands pursuant to the Pickett Act of 1910, 36 Stat. 847, was repealed by FLPMA in 1976, withdrawals (such as the 1926 Executive Order) made pursuant to those authorities remain in force today. 43 U.S.C. § 1701 note (FLPMA).
Water Resources	Western Watersheds Project	The Project's ground water pumping/dewatering cannot cause springs/waterholes established under PWR 107 in 1926 to be eliminated or have substantially reduced flows. Under the PWR 107 Executive Order and related laws, BLM cannot authorize activities that will impair the public use of any reserved waters and/or lands. BLM's approval of pumping/dewatering, and other activities associated with the Project, which could dry up or materially reduce springs and waterholes protected by PWR 107, would not be in compliance with these requirements. BLM cannot cause the loss of federal property such as PWR 107 reserved water rights and lands without congressional or Presidential authorization.
Water Resources	Western Watersheds Project	Destruction or loss of the reserved waters and withdrawn lands under PWR 107, including the location of Project facilities within the withdrawn lands, and/or the preclusion of public access via fencing, is prohibited under PWR 107, FLPMA, and the SRHA. Failure to review and fully protect the reserved water rights, waters, springs and water holes, related withdrawn lands, and public uses of these lands and waters, violates PWR 107, the SHRA, and BLM's duty under FLPMA to "by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the [public] lands." 43 U.S.C. § 1732(b). BLM must also review and fully protect these resources pursuant to FLPMA's mandate that: "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values." 43 U.S.C. § 1701(a)(8).
Water Resources	Western Watersheds Project	In addition, BLM must ensure that the Project will not disturb public lands withdrawn by the 1926 Executive Order in contravention of the purposes for which the land was withdrawn. Any mining claims filed or located on lands withdrawn by PWR 107 are null and void unless they meet the requirements under the Mining Law for the discovery of a valuable mineral deposit. "Mining claims located on lands not open to appropriation are null and void ab initio." Mount Royal Joint Venture v. Kempthorne, 477 F.3d 745, 756 (D.C. Cir. 2007), citing Shiny Rock Mining Corp. v. United States, 825 F.2d 216, 219 (9th Cir. 1987) (same).

Issue Category	Organization	Comment*
Water Resources	Western Watersheds Project	BLM must also keep the withdrawn lands "held open to the public use" as required by the SRHA, PWR 107, and FLPMA. BLM must consider, and can only approve, an alternative of locating/constructing Project facilities away from the lands withdrawn around the PWR 107 springs, and consider an alternative of not allowing the flows in these Springs to be diminished, in order to comply with PWR 107. The consideration of alternatives is "the heart of the environmental impact statement." 40 CFR § 1502.14. DOI/BLM has a duty to take a "hard look" at all reasonable alternatives to, and the environmental impacts from, Project operations. The agency must also adequately analyze mitigation measures to protect ground and surface water, and to adequately analyze the direct, indirect, and cumulative impacts to these resources.
Water Resources	Public	Approximately a year ago at a public meeting in Orovada I raised concerns about Lithium Nevada's proposal to transfer existing groundwater irrigation water rights to another well several miles away from the original points of appropriation. The original wells are currently used for irrigation on the opposite side of Quinn River from the new point of appropriation. The new point of appropriation is near the Bartell Ranch, LLC's stock water wells and our private meadows that are sub irrigated. At the meeting, I expressed a concern that use of this new point of appropriation was likely to drop the water table on the West side of the Quinn River substantially. When I raised the drawdown issues with the Lithium Nevada representatives they assured me that my concerns were unjustified and that they had a study showing no effect to our water. I requested a copy of the study and several months later I received a copy of their documentation. When I obtained the final study, I noted their earlier statement was inaccurate and not supported by their own study. The "windmill well" they monitored showed a drawdown after only 2.5 days oftest pumping of the Lithium Nevada's production well - a production well that was slightly over one-half mile away - indicating a significant drawdown is likely to occur given the hydrologic connection to our well. Based on their well test it appears there will be significant adverse impacts to both our wells as well as our sub-irrigated meadows.
Water Resources	Public	Recently the company has engaged in discussions with me to potentially mitigate adverse impacts on our private lands and water rights. These discussions are ongoing and we don't have a final resolution at this point. If these discussions were to be successful many of my concerns may be mitigated. In the interim it is important that the BLM in its NEPA review also address the mitigation necessary to mitigate our concerns relating to the adverse impacts to our private lands and the surrounding ecosystem. Without this mitigation this project has the potential to destroy the viability of our ranching unit and our livelihood. As part of the NEPA process the BLM should contact us to identify appropriate mitigation and in tum the decision maker for the lead agency should certify that the agency has considered such information.
Water Resources	Public	As part of the BLM decision process it needs to address not only the significant impact to the human environment but also whether this is a valid mineral deposit given the grade, marketability, environmental costs, and mitigation measures. Notably, in this case the authorization of mining on the federal minerals when such activities are likely to directly harm our wells and sub-irrigated meadows represents a taking of our property to achieve a federal purpose. Additionally, NEPA must consider the ramifications of what the ancillary yet connected actions, including the sulfur processing, disposal and discharges will be.
Water Resources	Public	Below is a partial list of concerns I have with the project that need addressed by the BLM in both its NEPA documentation and BLM's analysis of whether this is a commercially viable operation. As a BLM permitee, landowner, and affected water right holder, I would request that BLM actively engage me through-out the EIS for continued input as new information comes to light.
Water Resources	Public	Impacts to Water and Water Rights: 1) For phase 2 of the project Lithium Nevada is proposing to pump 5,200 acre feet per year. This is enough water to supply over 14 center pivots (assuming an average use of 3 acre feet per acre and 120 acre pivots). This area west of the Quinn River has no irrigation wells, the water table is close to the surface, and has remained stable despite extensive water level depletion on the east side of the Quinn River. With the amount of water·projected to be used from the new point of appropriation it is likely to drop the water table for miles around. With the drawdown from the mining operation, there will be major adverse impacts to vegetation on our private lands and to our 4 stock water wells (and potentially creeks/springs).
Water Resources	Public	2) At the mine site Lithium Nevada is proposing to dig a pit about 400' deep. This is below the elevation of springs on our private lands, our vested water rights on Pole Creek, and several springs we hold water rights within the Montana Mountains. While the pit is largely made up of clay, bore holes show layers of basalt and other materials imbedded in the clay, which given the right circumstances could transmit large

Issue Category	Organization	Comment*
		quantities of water (for example digging into a flooded lava tube). This could result in catastrophic flooding of the mine site and loss of surrounding aquafers.
Water Resources	Public	This area was once a super volcano which was active over hundreds of thousands of years. As such, in addition to the basalt layers, there are likely thousands of lava tubes, lava flows, steam vents, and other geologic structures that could transmit large volumes of water. These structures would in most cases be only be a few feet wide, and penetrate through the clay. Therefore, these type structures may be overlooked using the sampling and modeling studies Lithium Nevada has conducted (e.g. existing bore holes, wells, drill sites or groundwater models).
Water Resources	Public	In order to minimize the risk of Catastrophic mine site flooding, BLM should mandate the following conditions in the EIS. a) Require Lithium Nevada to have water rights for all water generated and/or diverted into the pit (including ground water lost to evaporation in pit lakes) and the beneficial use of pumping water to dewater the pit. b) Require Lithium Nevada to measure daily and make such measurements publicly available of all water pumped for mine de-watering and pit lake water lost to evaporation. c) Retain the authority of the BLM to curtail deepening or widening of the pit in the event of groundwater inflows or other environmental impacts that exceed projections. d) Require Lithium Nevada to cease operations and seal the pit if groundwater inflows substantially exceed projections. e) Require Lithium Nevada to determine the source of all water flowing into the pit. f) Require Lithium Nevada to conduct tracer dye studies to determine origins of any groundwater inflows. g) Require Lithium Nevada to compensate or mitigate water right holders if water is lost to the pit. h) When mining is completed require Lithium Nevada to seal and fill the pit well above current groundwater levels such that there is no pit lake formed from groundwater inflows or outflows into the groundwater aquafers.
Water Resources	Public	3) It is critically important that accurate spring and creek flow information be developed. I have reviewed Lithium Nevada's flow information and I have found major problems with the data. In fact I know several of the springs have data recorded that is inaccurate by an order of magnitude. For example, the documents reference some springs as "ephemeral" when in fact they never ever go dry.
Water Resources	Public	We are concerned that the company representatives trespassed on our private property in order to gather data relative to our private lands. This raises serious ethical concerns relative to the good faith, veracity, ethics and credibility of the company and its contractors.
Water Resources	Public	In order to effectively monitor the project as well as consider the effects in a NEPA document, it is important that the true hydrology of the springs and streams be documented.
Water Resources	Public	I request that the BLM engage in a "ground truthing" field trip, with me to actually look at all these sites, as well as consult with other parties and agencies that have observed or evaluated flows in this area. BLM should require Lithium Nevada to fund a 3rd party hired by the BLM to re-measure all springs and creeks, and audit all research conducted by Lithium Nevada and their consultants.
Water Resources	Public	From my personal knowledge, I make the following comments relative to errors in the company's data: a) Calvera Spring (SP-055) is reported to be "dry" and "ephemeral". Calvera spring never ever goes dry; it along with Lyle Spring supplies our water rights for about 10 miles of pipeline. b) A flow of 2 gpm of Lyle Springs at two different measuring times is reported. This is inaccuate. Lyle Spring has always flowed substantially more than that every time I have measured the flow. c) Flow oflndian Springs (SP-035) is reported as zero flow on the hydrograph, this is false or at least highly misleading; there is always standing water in Indian Springs and it irrigates about 12 acres. The flow generally is not significantly moving but that does not make it zero flow (since it supplies water to a lot of vegetation). This spring is constantly wet year around every year. d) Pole Creek above our water gap (Sp-036) is reported on the Hydrograph in Q2 of 2018 as zero flow however, in the spring of2018 pole creek was flowing here. I personally visited pole creek just below this site around this time and observed flow. e) Pole Creek flows are vastly under reported. Pole creek routinely has flows of over 500 GPM in the spring, throughout most of the creek, and sections of Pole Creek fl.ow year around every year. Yet Lithium Nevada's consultants claim to have only measured a few gallons per minute. f) The main year around flow of pole creek is between SP 036 and SP 050, yet this section does not appear to have been measured at all. This section of Pole Creek contains or recently contained threatened Lahontan Cutthroat Trout. Yet incredibly no fl.ow data is provided for this section what-so-ever. This omission must be corrected.

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Water Resources	Public	4) I have also been told by longtime local residents that the lithium exploration activities have dried up springs in the Montana Mountains (by drilling unsealed boreholes too close to springs and allowing the water table to drop to a lower aquafer). These adverse impacts to the springs are verified by Lithium Nevada's own research. According to Lithium Nevada's Water Quantity and Quality Impacts Assessment Report page 11: "Likewise, the continuous drainage of WSH-17 [a test well] suggests the borehole intercepted the fault barrier and is slowly re-equilibrating to the downgradient hydrologic block." While this is not the same bore hole that was referenced by the local resident as having dried up a spring, it clearly shows that Lithium Nevada's exploration activities are altering the hydrology potentially damaging the environment and water right holders.
Water Resources	Public	BLM should investigate all alleged historical borehole impact on springs, and mandate remedies for any documented impacts - including casing and sealing of any test wells they drilled. The EIS should also mandate the following conditions on Lithium Nevada's future exploration; a) Prohibit any method of bore hole/core testing that could result in the collapse of the hole prior to filling. b) Mandate all bore holes deeper than 10' be filled with concrete, and properly abandoned immediately after drilling is completed. c) Require substantial bonding and 3rd party monitors of any bore holes within a mile of a known spring. d) Require water right holders to be notified of any bore hole or well being drilled within 2 miles of their water rights, with a map showing the precise location of the proposed bore hole.
Water Resources	Center for Biological Diversity	The environmental analysis should consider impacts to water quantity, including, but not limited to, surface and ground diversions caused by direct impacts to pre-mining water transport (e.g. by dewatering, channeling, intentional and unintentional ground flow alterations, mine consumptive uses, etc. Numerical modeling for ground (and surface, if present) water quantities should be conducted. The proponent has secured only a relatively small water right that is associated with this site to date, until additional water rights are secured and the transfer of those rights is approved, the BLM cannot fully assess impacts from the water use as compared to the now-existing place of use.
Water Resources	Center for Biological Diversity	Most mineral mines tend to almost always significantly, permanently degrade water quality and fisheries. For this reason, among others, it is critical that the regulatory analysis fully explore reasonable alternatives that consider not only the mine's proposed plan alternatives that are necessary to protect water quality and fisheries (among other uses) -- even if an alternative is not favorable to the proponent because it may cost more than desirable to the proponent. This is essential for the public and government agencies to assess the accuracy and precision of the proposed plan's ability to protect human health and the environment (notably water quality and fisheries). Numerical modeling for ground (and surface, if present) water quality should be conducted. BLM should prioritize avoiding impacts to water quality as experience has shown that long-term water treatment at mine sites is not ultimately an effective mitigation measure for impacts to water quality.
Water Resources	Center for Biological Diversity	While pit dewatering is not expected to be required until 2055, given that the pit will eventually need to be dewatered it will be important to analyze the impacts of a fluctuating water level on any backfilled materials that could be placed there. This should include considering a range of qualities and characteristics of the water that will be rising and receding and therefore creating wet-dry cycles within the backfilled materials. Backfill should not be placed in a zone where the water level will see regular fluctuations.
Water Resources	Center for Biological Diversity	Alternatives should consider pumping during mining and impacts of the pit filling to a specific level with water after mining and reclamation are completed. It is important to include that pits may take decades or centuries to fill with water (or fill to their highest groundwater interception/egress point) and create physical and chemical hazards.
Water Resources	Center for Biological Diversity	The pit analysis should consider the impacts of the pit on adjacent ground (and surface water) as a function of the pit acting as both water source and water sink.
Water Resources	Center for Biological Diversity	The BLM must recognize that impacts to some resources are unmitigable and therefore should not be allowed to occur based on later promises of reclamation because they would cause would cause unnecessary and undue degradation of public lands resources. For example, damage to water resources from acid mine drainage requires long-term reclamation including water treatment in virtually in perpetuity—creating new mining sites with long-term impacts to water resources is unreasonable and would cause unnecessary and undue degradation of public lands resources.

Issue Category	Organization	Comment*
Water Resources	NV Backcountry Hunters and Anglers	What measures will be implemented to prevent infiltration of possible chemical contaminants to ground water outside of the CTFS? Will details regarding the geomembrane liner proposed to prevent seepage at the CTFS be provided in order to assess its long term viability?
Water Resources	Great Basin Resource Watch	Mining water requirements. It is our understanding that the project as proposed will be dewatering the open pit in the second stage of the mine plan, but to a small extent of about 90 GPM (gallon per minute), and that the pit will be backfilled so no anticipate mining pit lake. There does need to be a hydrogeochemical evaluation of the potent for groundwater flowing through backfill to degrade groundwater.
Water Resources	Great Basin Resource Watch	There will be considerable water extraction with a consumptive use of 2,600 AF per year during Phase 1, and 5,200 AF per year during Phase 2. BLM needs to consider that the source of water for the mine, Quinn River Valley Oravada hydrographic basin, is already over allocated. The state of Nevada Division of Water Resources 2017 Crop Inventory reporti shows that in the Quinn River Valley - Orovada Subarea hydrographic basin pumping was estimated at 52,678 AFA. This basin according to the Nevada Division of Water Resources has an estimated perennial yield of 60,000 AFA. Thus, water extraction is hovering near the maximum sustainable volume in the basin. BLM needs to evaluate the increased consumptive water use with respect to a basin at or near its perennial yield. Keeping in mind that perennial yields are also and estimate it would be prudent to avoid water use right up to the perennial yield.
Water Resources	Great Basin Resource Watch	According to the Plan of Operations (PoO)ii Lithium Nevada acquired water rights totaling 995.5 acre-feet annual (AFA). Of this only 15.5 are for mining and milling. The PoO also mentions an option to acquire an additional 2,717 AFA. Thus, Lithium Nevada is anticipating that there will be sufficient water rights to develop Phase 1 assuming that the unsecured rights are not protested. Phase 2 of the PoO requires an additional 2,600 AFA, for which no option to acquire is mentioned. BLM needs to evaluate the possibility that the additional water rights are not available for Phase 2 and any environmental or socioeconomic consequences that may occur if Lithium Nevada has to suspend operations or close operations? BLM, should determine the needed bond in the case that Phase 2 is not implemented and the company abandons the site at that point.
Water Resources	Great Basin Resource Watch	The point of diversion for pumping the water for the proposed mine raised some concerns at the public meeting on February 6. There needs to be a through analysis of rate of diversion expected and the effect on the Quinn River and nearby existing wells.
Water Resources	Great Basin Resource Watch	Draft Environmental Impact Statement (DEIS) Must Fully Review Impacts to Federal Reserved Water Rights and Withdrawn Lands, and Prevent Adverse Impacts to Those Resources. The company's Plan of Operations acknowledges that the dewatering of the aquifer and substantial lowering of the water table may cause loss and/or elimination of springs and streams, which would violate BLM's duties to protect these resources under FLPMA and Presidential Order. Water flows in springs and waterholes on public land in the West are reserved for public use by Public Water Reserve # 107 ("PWR 107"), which was created by Executive Order by President Calvin Coolidge in 1926. The reservation of federal water rights also included a withdrawal from entry of public lands ¼ mile around each spring/waterhole. PWR 107 provides: [I]t is hereby ordered that every smallest legal subdivision of public land surveys which is vacant, unappropriated, unreserved public land and contains a spring or water hole, and all land within one quarter of a mile of every spring or water hole located on unsurveyed public land, be, and the same is hereby, withdrawn from settlement, location, sale, or entry, and reserved for public use in accordance with the provisions of Section 10 of the Act of December 29, 1916. Executive Order of Apr. 17, 1926, previously codified at 43 C.F.R. § 292.1 (1938). See also GENERAL LAND OFFICE, DEPARTMENT OF INTERIOR, CIRCULAR 1066, 51 I.D. 457- 58 (1926) ("[t]he above order [PWR #107] was designed to preserve for general public use and benefit unreserved public lands containing water holes or other bodies of water needed or used by the public for watering purposes."). 1926 I.D. LEXIS 45.
Water Resources	Great Basin Resource Watch	The 1926 Executive Order and withdrawal were promulgated under the authority of Section 10 of the Stock-Raising Homestead Act of Dec. 29, 1916, 39 Stat. 862, 865, 43 U.S.C. § 300 (SRHA), which provided that withdrawn "lands containing water holes or other bodies of water needed or used by the public for watering purposes … shall, while so reserved, be kept and held open to the public use for such purposes…." Although the Stock-Raising Homestead Act and the underlying authority of the President to withdraw such lands pursuant to the Pickett Act of 1910, 36 Stat. 847, was repealed by FLPMA in 1976, withdrawals (such as the 1926 Executive Order) made pursuant to those authorities remain in force today. 43 U.S.C. § 1701 note (FLPMA).

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Water Resources	Great Basin Resource Watch	The Project's ground water pumping/dewatering cannot cause springs/waterholes established under PWR 107 in 1926 to be eliminated or have substantially reduced flows. Under the PWR 107 Executive Order and related laws, BLM cannot authorize activities that will impair the public use of any reserved waters and/or lands. BLM's approval of pumping/dewatering, and other activities associated with the Project, which could dry up or materially reduce springs and waterholes protected by PWR 107, would not be in compliance with these requirements.
Water Resources	Great Basin Resource Watch	BLM cannot cause the loss of federal property such as PWR 107 reserved water rights and lands without congressional or Presidential authorization.
Water Resources	Great Basin Resource Watch	Destruction or loss of the reserved waters and withdrawn lands under PWR 107, including the location of Project facilities within the withdrawn lands, and/or the preclusion of public access via fencing, is prohibited under PWR 107, FLPMA, and the SRHA.
Water Resources	Great Basin Resource Watch	Failure to review and fully protect the reserved water rights, waters, springs and water holes, related withdrawn lands, and public uses of these lands and waters, violates PWR 107, the SHRA, and BLM's duty under FLPMA to "by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the [public] lands." 43 U.S.C. § 1732(b).
Water Resources	Great Basin Resource Watch	BLM must also review and fully protect these resources pursuant to FLPMA's mandate that: "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values." 43 U.S.C. § 1701(a)(8).
Water Resources	Great Basin Resource Watch	In addition, BLM must ensure that the Project will not disturb public lands withdrawn by the 1926 Executive Order in contravention of the purposes for which the land was withdrawn. Any mining claims filed or located on lands withdrawn by PWR 107 are null and void unless they meet the requirements under the Mining Law for the discovery of a valuable mineral deposit. "Mining claims located on lands not open to appropriation are null and void ab initio." Mount Royal Joint Venture v. Kempthorne, 477 F.3d 745, 756 (D.C. Cir. 2007), citing Shiny Rock Mining Corp. v. United States, 825 F.2d 216, 219 (9th Cir. 1987) (same).
Water Resources	Great Basin Resource Watch	BLM must also keep the withdrawn lands "held open to the public use" as required by the SRHA, PWR 107, and FLPMA.
Water Resources	Great Basin Resource Watch	BLM must consider, and can only approve, an alternative of locating/constructing Project facilities away from the lands withdrawn around the PWR 107 springs, and consider an alternative of not allowing the flows in these Springs to be diminished, in order to comply with PWR 107. The consideration of alternatives is "the heart of the environmental impact statement." 40 CFR § 1502.14. DOI/BLM has a duty to take a "hard look" at all reasonable alternatives to, and the environmental impacts from, Project operations. The agency must also adequately analyze mitigation measures to protect ground and surface water, and to adequately analyze the direct, indirect, and cumulative impacts to these resources.
Water Resources	Great Basin Resource Watch	A complete characterization of the surface waters and springs and an understanding of groundwater movement is needed. To achieve this end, at least one year of monthly samples followed by quarterly samples, as a baseline. There should have been recorded water level data in every exploration bore-hole collected. An adequate number of those boreholes should become monitoring wells and there should be a minimum 2 years of hydrologic baseline collected.
Water Resources	Great Basin Resource Watch	Complete assay analysis is also needed to include Safe Drinking Water and Nevada Dept. of Environmental Protection standards.
Water Resources	Great Basin Resource Watch	Changes in water dynamics need to be examined as to how local flora and fauna will be affected; potential loss of springs or changes in the water table, for example. Analysis must address whether the springs are on wildlife migratory routes, and, if so, how migrations will be affected. Of particular concern is how Thacker Creek and downstream reservoirs will be affected including all seeps and springs including an analysis of the potential loss of riparian areas.
Water Resources	Earthworks	We are also concerned about potential pollution from processing facilities, as well as water usage, both of which need to be addressed in greater detail. Pumping water near the Quinn River was also a concern to the ranching and farming attendees at the public meeting. Both the Kings Valley and Quinn Valley water basins appear to be over allocated.

Issue Category	Organization	Comment*
Wild Horses	Friends of Animals	Among the many animals to be impacted by the proposed project are wild horses, including wild horses in the Little Owyhee, Owyhee, Snowstorm Mountains, Rock Creek, and Little Humboldt Herd Management Areas. Not only would the proposed operation and construction of the mine have the potential to disturb and injure wild horses, but the use of water and potential pollution of surrounding areas could also be detrimental to these animals. This is an area where water is scarce, and drought is common. Notably, the Bureau of Land Management has already removed thousands of wild horses due to drought. The proposed action would only exacerbate the problem by depleting and contaminating the limited water that is available.
Wilderness and ACEC	Great Basin Resource Watch	Creating a new ACEC is an option that is open to BLM because BLM is not only preparing an EIS for the proposed Thacker Pass lithium mine, but is also preparing a Resource Management Plan amendment related to the mine. The RMP amendment process is the administrative moment in which new ACECs are considered. 43 CFR § 1610.7-2 states, "Areas having potential for Areas of Critical Environmental Concern (ACEC) designation and protection management shall be identified and considered throughout the resource management planning process."
Wilderness and ACEC	Great Basin Resource Watch	A Montana Mountains ACEC would meet 43 CFR § 1610.7-2's criteria for ACEC designation (relevance and importance). The relevance criterion is met because there are there are significant fish and wildlife resources currently present in the Montana Mountains (Lahontan cutthroat trout1 and greater sage-grouse leks and habitat). The importance criterion is met because the Montana Mountains have state and regional importance as wildlife habitat (Lahontan cutthroat trout, greater sage-grouse) that go well beyond the Montana Mountains' local importance to wildlife.
Wilderness and ACEC	Great Basin Resource Watch	Because this is a viable mitigation alternative that meets the ACEC designation criteria and because BLM already plans to revise the RMP, BLM is obligated to fully analyze this alternative in the EIS.
Wilderness and ACEC	Great Basin Resource Watch	Double H Mountains Wildlife Mitigation Alternative. Immediately to the south of the Project lie the Double H Mountains. They include important habitat for wildlife, including the Double H bighorn herd. To mitigate for the proposed Project's wildlife mortality, destruction of wildlife habitat, and noise impacts to wildlife, the Double H Mountains should be protected as an Area of Critical Environmental Concern managed to protect wildlife and cultural resources.
Wilderness and ACEC	Great Basin Resource Watch	Creating a new ACEC is an option that is open to BLM because BLM is not only preparing an EIS for the proposed Thacker Pass lithium mine, but is also preparing a Resource Management Plan amendment related to the mine. The RMP amendment process is the administrative moment in which new ACECs are considered. 43 CFR § 1610.7-2 states, "Areas having potential for Areas of Critical Environmental Concern (ACEC) designation and protection management shall be identified and considered throughout the resource management planning process."
Wilderness and ACEC	Great Basin Resource Watch	A Double H Mountains ACEC would meet 43 CFR § 1610.7-2's criteria for ACEC designation (relevance and importance). The relevance criterion is met because there are there are significant fish and wildlife resources currently present in the Double H Mountains (Double H bighorn herd). The importance criterion is met because the Double H Mountains have state and regional importance as wildlife habitat. The Double H bighorn herd is a source stock for translocation efforts elsewhere,2 so protecting its habitat is important for protecting the health of bighorn herds beyond the local area.
Wilderness and ACEC	Great Basin Resource Watch	Because this is a viable mitigation alternative that meets the ACEC designation criteria and because BLM already plans to revise the RMP, BLM is obligated to fully analyze this alternative in the EIS.
Wilderness and ACEC	Great Basin Resource Watch	Thacker Creek Protection Alternative. Perennial surface water is precious in the desert and needs to be protected everywhere it occurs. Thacker Creek is an especially important surface water resource for area wildlife. The EIS should include an alternative with protection measures that ensure that Thacker Creek's water quality and quantity does not decrease. These include, but are not limited to, moving mine features considerably further away from Thacker Creek than currently shown on Project maps.
Wildlife	USEPA	We recommend that the BLM continue to work closely with the U.S. Fish and Wildlife Service and the Nevada Department of Wildlife to determine potential impacts of the project on plant and wildlife species, especially species classified rare, threatened, or endangered on either state or federal lists.

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Wildlife	USEPA	Identify and quantify which species and/or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species; emphasis should be placed on the protection and recovery of species due to their status or potential status under the federal or state Endangered Species Act.
Wildlife	USEPA	Discuss how surveys were conducted for each species, their findings, and all follow-up surveys and monitoring that would be conducted before, during, and after mining occurs;
Wildlife	USEPA	Discuss the project's consistency with existing law and regulations, including resource management plans applicable to the proposed project area, and ascribe to the goals, objectives, land use allocations, and management decisions and actions prescribed in such plans;
Wildlife	USEPA	Include the biological assessment by reference or as an appendix, if one is prepared;
Wildlife	USEPA	Summarize, or include as an appendix in the Draft EIS, USFWS's biological opinion if one is prepared; and
Wildlife	USEPA	Demonstrate that the preferred alternative is consistent with the biological opinion, if applicable.
Wildlife	USEPA	Discuss mitigation measures to minimize impacts to special status species and to prevent exposure of migratory birds and other wildlife to any toxic solutions, electrocution hazards, spills, or mine influenced waters. Discuss the effectiveness of mitigation measures to protect wildlife and indicate how they would be implemented and enforced. Describe maintenance requirements and monitoring to ensure their effectiveness over the life of the mine, or post-closure, if applicable.
Wildlife	Public	This area is an important habitat of the endangered sage grouse. The Montana Double H Range are well known for their sensitive populations of these important birds. Bighorn sheep inhabit this area directly in the hills where the beginning part of this mine will start. Mule deer will be directly impacted as this is an important winter migration area. Chukar upland game birds are actively pursued by the same people that bring so much money to our area from both Nevada and California. Cattle graze and cohabitate with these native populations in harmony.
Wildlife	Coalition for NV Wildlife	A major sage grouse lek (Montana 10) is located approximately 0.75 miles north of the northern project boundary. Noise from mining-related activities could seriously impact this lek. Noise and lek success should be monitored and appropriate mitigation measures required such as limiting noise levels certain times of the day during certain months.
Wildlife	Coalition for NV Wildlife	Any recreation planning should not increase human traffic into the Montana Mountains to minimize disturbance of sage grouse and other wildlife.
Wildlife	Coalition for NV Wildlife	The Coalition commits to working with all affected agencies and the proponent to assure the project is successful while protecting our wildlife resources and the habitat on which they depend.
Wildlife	USFWS	The USFWS recommends that Lithium Nevada Corp. apply for an eagle permit under the Eagle Act. This recommendation is based on the project's foot print, and on the locations of golden eagle nests, and on the sound levels from the proposed project which include blasting. Enough information currently exists with both the plan of operation and golden eagle nests locations for a permit application to be submitted soon. The USFWS recommends that Lithium Nevada Corp. apply for a permit relatively soon to avoid delays during or after the EIS process.
Wildlife	USFWS	The USFWS recommends that the BLM prepare an action alternative within the EIS specifically for issuing an eagle permit. Such an action alternative should address impacts to golden eagles and the required compensatory mitigation together, as required under the federal regulations implementing the Eagle Act. As a Cooperating Agency, having such an action alternative is important, if not essential, for the USFWS to meet its regulatory requirements under both the Eagle Act and NEPA. In order to better understand this recommendation, please consult BLM's 2019 Hycroft Mine EIS. The impacts and analyses will be different between the Hycroft EIS and the Thacker Pass Lithium Mine EIS, but the approach will be similar. Using the Hycroft Mine EIS as an example will greatly help both our agencies address our legal manages under one NEPA document.
Wildlife	Friends of Animals	The proposed open pit lithium mine would cause permanent and irreversible damage to the environment and the plants and animals that reside there.

Issue Category	Organization	Comment*
Wildlife	Friends of Animals	Wild horses are not the only animals that will be negatively impacted. The project would drastically alter the environment and impact all the animals that live there, including threatened Lahontan cutthroat trout.
Wildlife	Public	First, I would like to comment on an article I recently read in Nevada Mining Quarterly titled ''Thacker Pass Lithium Project on Schedule". The author, Adella Harding, quoted Lithium Nevada CEO Alexi Zawadzki as saying and I quote"... there hasn't been a sage grouse spotted on the current site area in 10 years." It is my factual observation that this statement is not true. As recently as January28, 2020, my wife and I observed 6 sage grouse on the project sight while traveling through it to go chukar hunting. In as much as this sighting and other sage grouse sign have been observed by us this year and in previous winters I contacted Ken Loda at the BLM office in Winnemucca. Ken told me that our observations would likely be considered "anecdotal" for the review process. I offered to show him the sight where we saw the birds but he advised me that they(BLM} were short handed and not able to meet with me. He also told me that BLM biologists had visited the sight in the past and not seen any sage grouse. This motivated my wife and I to return to the project site on Tuesday February 4, 2020. We saw several sage grouse tracks in the snow in the same general area we saw the birds earlier, I am providing photos of the tracks alongside my GPS. Anecdotal evidence, I don't think so.
Wildlife	Public	I offer all of this because sage grouse are considered a bellwether species. As they go, so do other species to include mule deer, pronghorn, raptors, etc. I believe the project area is a critical wintering area for the sage grouse and the other species mentioned above. Winter populations may vary considerably depending on the severity of the winter to include snow depth in the upper elevations of the Montana Mountains. Sagebrush, especially the tall stands found in the project area, provides important thermal protection during a harsh winter as well as protection from predators and is a critical food source. It is my opinion that this project will result in significant habitat fragmentation for the sage grouse and other species and lead to population declines especially during severe winters
Wildlife	Public	To offset this adverse environmental impact I recommend the following: 1) That Lithium Nevada, in partnership with the Great Basin Sagebrush Restoration Fund, treat the Holloway Fire Complex of the Montana Mountains with their new seed enhancement technology, and, 2) The sagebrush impacted areas of the Montana Mountains be treated in their entirety as reflected in the attached BLM maps and, 3) That these areas be treated at least annually until a successful result is obtained as determined by independent scientific study.
Wildlife	Public	I also have some questions with respect to sage grouse habitat that I think should be addressed as part of the EIS. 1) If one believes a sage grouse hasn't been spotted in the project area in the last 10 years, what factors are the cause for the decline? The answers should address mining exploration, habitat fragmentation, fire, etc. 2) Did BLM or Lithium Nevada biologists visit the project area as it pertains to sage grouse habitat during the winter months? How often?
Wildlife	Public	If there are no sage grouse in the project area as some believe, why is there metal flashing on the top strand of fencing along Highway 293 adjacent to the project site? As I understand it sage grouse may fly into the top strand in certain low light conditions; therefore the need for the flashing. Am I incorrect in this assessment?
Wildlife	Western Watersheds Project	The EIS Should Include Wildlife and Habitat Protection Alternatives. The EIS should include alternatives that reduce the mine's impacts to wildlife and their habitat. At a minimum, these should include: Montana Mountains Wildlife Mitigation Alternative: Immediately to the north of the proposed Project lie the Montana Mountains. They include important habitat for wildlife, including greater sage-grouse and Lahontan cutthroat trout, as well as highly suitable bighorn habitat that was occupied until the Montana Mountain bighorn herd was euthanized in 2016 due to a disease outbreak. To mitigate for the proposed Project's destruction of wildlife habitat and noise impacts to wildlife, the Montana Mountains should be protected as an Area of Critical Environmental Concern managed to protect wildlife and cultural resources. It is our understanding that the Project Applicant has stated publicly that it will not mine in the Montana Mountains, so creating an ACEC would not thwart potential expansion plans. Creating a new ACEC is an option that is open to BLM because BLM is not only preparing an EIS for the proposed Thacker Pass lithium mine, but is also preparing a Resource Management Plan amendment related to the mine. The RMP amendment process is the administrative moment in which new ACECs are considered. 43 CFR § 1610.7-2 states, "Areas having potential for Areas of Critical Environmental Concern (ACEC) designation and protection management shall be identified and considered throughout the

Issue Category	Organization	Comment*
		resource management planning process." A Montana Mountains ACEC would meet 43 CFR § 1610.7-2's criteria for ACEC designation (relevance and importance). The relevance criterion is met because there are there are significant fish and wildlife resources currently present in the Montana Mountains (Lahontan cutthroat trout5 and greater sage-grouse leks and habitat). The importance criterion is met because the Montana Mountains have state and regional importance as wildlife habitat (Lahontan cutthroat trout, greater sage-grouse) that go well beyond the Montana Mountains' local importance to wildlife. Because this is a viable mitigation alternative that meets the ACEC designation criteria and because BLM already plans to revise the RMP, BLM is obligated to fully analyze this alternative in the EIS. 5 Lahontan Cutthroat Trout are listed as a threatened species under the Endangered Species Act. Attachment 4 details Lahontan Cutthroat Trout monitoring in five creeks in the Montana Mountains and reports their presence in two. Nevada Department of Wildlife. 2016. Federal Aid Job Progress Report: F-20-52 2016. Lahontan Cutthroat Trout Study. 6 See Attachment 7 at 101. 2018-2019 Nevada Department of Wildlife Big Game Status Report. Available at http://www.ndow.org/uploadedFiles/ndoworg/Content/Wildlife_Education/Publications/FINAL%202019%20v%20III(2).pdf.
Wildlife	Western Watersheds Project	Thacker Creek Protection Alternative: Perennial surface water is precious in the desert and needs to be protected everywhere it occurs. Thacker Creek is an especially important surface water resource for area wildlife. The EIS should include an alternative with protection measures that ensure that Thacker Creek's water quality and quantity does not decrease. These include, but are not limited to, moving mine features considerably further away from Thacker Creek than currently shown on Project maps.
Wildlife	Western Watersheds Project	The EIS Should Thoroughly Analyze Impacts to Wildlife. In addition to providing full baseline data about wildlife and thoroughly analyzing the Project's impacts to wildlife as detailed below, the EIS should include a description of the wildlife monitoring BLM will require during the construction and operations stages of the Project.
Wildlife	Western Watersheds Project	Bighorn Sheep: The Project would be located at the northern end of the mapped range of the Double H bighorn herd, where the former Montana Mountains herd's mapped habitat met the Double H's. Activity at the mine and its exploration areas will likely limit natural dispersal/pioneering of members of the Double H bighorn herd northward. This in turn would limit the potential for natural herd reestablishment in the Montana Mountains and limit genetic exchange between the Double H and Trout Creek herds. The mine would also affect any potential future plans to artificially reestablish a Montana Mountains herd. The EIS should assess all of these factors, and discuss the location of the area's traditional bighorn sheep migration route/corridor and the Project's potential impacts to that it. The EIS should also analyze the full impacts of the Project to bighorn, including, but not limited to, noise, roads, possibility of drowning, loss of surface water and vegetation used by the sheep, groundwater loss, and mine leakage. This is especially important because the Double H bighorn herd is healthy7 and has been used as source stock for translocations.8 The EIS must explain how the mine will affect the Double H herd, including whether there is an increased likelihood of dispersal in other directions toward domestic sheep (i.e., into the valleys) because the suitable corridor will be modified or have too much activity for bighorn sheep to tolerate. It is our understanding that the disease transmission that resulted in the 2016 euthanization of the Montana Mountains bighorn herd occurred after nose-to-nose contact of one bighorn with domestic sheep in the Kings River Valley. The Double H herd must be protected from a similar fate. In addition, the EIS should disclose where lambing occurs for the Double H herd, and analyze the Project's impacts on lambing. Finally, because the Double H herd is a source stock for translocations, negative impacts to the Double H herd have potential to harm future bighorn translocation efforts throughout the state and even the region. The EIS should analyze these potential impacts.
Wildlife	Western Watersheds Project	We also note that it is the policy of the Nevada Department of Resources (NDOW) that "[t]he Division will increase bighorn populations of all subspecies statewide to a level where all habitats are occupied and each herd is self-sustaining."9 The impacts of this Project have potential to decrease NDOW's ability to achieve this, which should be discussed in the EIS, including as a potential conflict with a State wildlife plan. Furthermore, bighorn sheep are a BLM Nevada Sensitive Species, and are subject to direction included in Manual 6840, BLM's Special Status Species Management manual.10 Manual 6840 includes the objective of: "initiat[ing] proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA" (Objective 0.2 B). The manual further states that "[o]n BLM-administered lands, the BLM shall manage Bureau sensitive species and their habitats to minimize or eliminate threats affecting the status of the species or to improve the condition of the species habitat, by: 1.Determining, to the extent

Issue Category	Organization	Comment*
		practicable, the distribution, abundance, population condition, current threats, and habitat needs for sensitive species, and evaluating the significance of BLM-administered lands and actions undertaken by the BLM in conserving those species. 2. Ensuring that BLM activities affecting Bureau sensitive species are carried out in a way that is consistent with its objectives for managing those species and their habitats at the appropriate spatial scale.
Wildlife	Western Watersheds Project	Manual 6840 at .2A1. In regard to bighorn, this Project clearly conflicts with Manual 6840. The EIS should disclose this conflict and discuss the measures BLM will take to mitigate that conflict.
Wildlife	Western Watersheds Project	Golden eagles are fully protected under the Bald and Golden Eagle Protection Act, including protection from incidental take and disturbance. The EIS should thoroughly analyze the Project's potential impacts to golden eagles, such as habitat loss and mortality due to proposed and existing powerlines, and also provide baseline information about golden eagle use of the area. Because golden eagles use large home areas for foraging, the Project's habitat destruction has potential to reduce food sources for the eagles and in turn reduce breeding productivity and chick survival. Therefore, golden eagle nest surveys should be conducted in both the Montana and Double H Mountains, and observational surveys should be conducted at the Project site. The EIS should also analyze the area's golden eagle population trends, prey population and prey population trends, and whether golden eagle incidental take/disturbance permits will be required. In addition, BLM should require golden eagle monitoring beginning with the Project construction phase and continuing into operations. The EIS should also include an Eagle Conservation Plan, developed with U.S. Fish and Wildlife Services, that contains substantial eagle mitigation measures.
Wildlife	Western Watersheds Project	In recent years, Nevada greater-sage grouse habitat has been devastated by wildfire, worsened by livestock grazing, ill-considered vegetation removal projects, mining projects and other development. The result is that greater sage-grouse are at ever increasing risk. The EIS should provide well-developed baseline data about the local greater sage-grouse population, including long-term population trends, lek trends, genetic connectivity with other sage-grouse populations, accurate site baseline noise levels, and whether the grouse in the local Population Management Area include migratory grouse. The EIS should also map designated and seasonal sage-grouse habitat. In addition, the EIS should discuss how the Project will impact greater sage- grouse and its habitat, including but not limited to habitat modification and destruction, noise, roads, power lines, water quality and quantity changes, and potential for predation increases. BLM's 2015 Nevada/Northeastern California Sage-Grouse Approved Resource Management Plan Amendments (2015 Sage-Grouse ARMPA) is currently in effect. The EIS should detail how this Project would conform to the 2015 Sage-Grouse ARMPA, including its net conservation benefit standard, as well as all of the other requirements of the ARMPA. The Project Applicant's proposed off-site mitigation should also be analyzed in detail, including its durability. We are particularly concerned about the Project's potential for noise impacts, especially in light of baseline noise readings that were collected for the area's prior exploration/clay mine Environmental Assessment. They appear too high for a rural area and should not be relied upon for this Project.
Wildlife	Western Watersheds Project	The impacts of the Project on Lahontan Cutthroat Trout should be thoroughly analyzed in the EIS, including, but not limited to, the Project's potential to cause hydrological changes and groundwater loss outside of the immediate Project area. The EIS should also thoroughly explain the Endangered Species Act Section 7 consultation process and describe the discussions with U.S. Fish and Wildlife Service that have taken place to date.
Wildlife	NV Backcountry Hunters and Anglers	Backcountry Hunters and Anglers is nationwide organization with state and province chapters across North America. Our stated mission is to advocate on behalf of wildlife and wild places to maintain our tradition of public land hunting and fishing. We recognize the multiple use mandate of public lands under the purview of the BLM. However, extreme care must be taken to avoid negative wildlife impacts as much as possible. If this care is not maintained at the forefront of development, listing of threatened and endangered species could cause landscape scale impacts that perhaps no stakeholder would find palatable.

Issue Category	Organization	Comment*
Wildlife	NV Backcountry Hunters and Anglers	What measures can be instituted to reduce/eliminate, to the greatest extent possible, impacts to sage grouse reproduction and habitat within the greater Thacker pass area?(i.e. Montana mountains, Double H mountains)
Wildlife	NV Backcountry Hunters and Anglers	What impact will increased traffic on existing routes have on mule deer, bighorn sheep and sage grouse?
Wildlife	NV Backcountry Hunters and Anglers	What design features will be included to avoid and/or minimize wildlife & habitat conflicts?
Wildlife	NV Backcountry Hunters and Anglers	Dewatering models show that seeps, springs, and streams will be affected north of the project area. While some effects to wildlife will be mitigated through guzzlers, what mitigation will be implemented to supplant the lost vegetation and habitat quality that wildlife also rely on? Additionally, water flow reduction could severely impact Lahontan Cutthroat trout within Crowley, pole, and rock creeks. Creative mitigation solutions need to be proposed/analyzed within the draft environmental impact statement in order to prevent permanent negative impacts to fish and wildlife.
Wildlife	NV Backcountry Hunters and Anglers	How will the Double H mountains herd of California bighorn sheep be affected by habitat fragmentation brought about by the proposed mine? It is critical that it doesn't increase the likelihood of exposure to domestic sheep, as disease transmission has been a serious issue in the area in the recent pass.
Wildlife	NV Backcountry Hunters and Anglers	We would ask that it be explicitly stated that NDOW is to be consulted at every step of the decision-making process, so that wildlife impacts can be addressed.
Wildlife	Great Basin Resource Watch	A full inventory of the loss of plant and animal species, examining both estimated numbers and specie variation needs to be done as a result of land disturbance, waste rock, heap leach pads, and tailings coverage. The Montana range is also very important and sensitive habitat for sage grouse, big horn sheep, raptors, and other Great Basin species. The DEIS needs to include the entire area of the Montana range in the cumulative impacts region. The affects of noise, air and water quality and habitat destruction need to be thoroughly analyzed.
Wildlife	Great Basin Resource Watch	Montana Mountains Wildlife Mitigation Alternative: Immediately to the north of the proposed Project lie the Montana Mountains. They include important habitat for wildlife, including greater sage-grouse and Lahontan cutthroat trout, as well as highly suitable bighorn habitat that was occupied until the Montana Mountain bighorn herd was euthanized in 2016 due to a disease outbreak. To mitigate for the proposed Project's destruction of wildlife habitat and noise impacts to wildlife, the Montana Mountains should be protected as an Area of Critical Environmental Concern managed to protect wildlife and cultural resources. It is our understanding that the Project Applicant has stated publicly that it will not mine in the Montana Mountains, so creating an ACEC would not thwart potential expansion plans.
Wildlife	Great Basin Resource Watch	The Project would be located at the northern end of the mapped range of the Double H bighorn herd, where the former Montana Mountains herd's mapped habitat met the Double H's. Activity at the mine and its exploration areas will likely limit natural dispersal/pioneering of members of the Double H bighorn herd northward. This in turn would limit the potential for natural herd reestablishment in the Montana Mountains and limit genetic exchange between the Double H and Trout Creek herds. The mine would also affect any potential future plans to artificially reestablish a Montana Mountains herd. The EIS should assess all of these factors, and discuss the location of the area's traditional bighorn sheep migration route/corridor and the Project's potential impacts to that it. The EIS should also analyze the full impacts of the Project to bighorn, including, but not limited to, noise, roads, possibility of drowning, loss of surface water and vegetation used by the sheep, groundwater loss, and mine leakage.

Issue Category	Organization	Comment*
Wildlife	Great Basin Resource Watch	This is especially important because the Double H bighorn herd is healthy7 and has been used as source stock for translocations.8 The EIS must explain how the mine will affect the Double H herd, including whether there is an increased likelihood of dispersal in other directions toward domestic sheep (i.e., into the valleys) because the suitable corridor will be modified or have too much activity for bighorn sheep to tolerate. It is our understanding that the disease transmission that resulted in the 2016 euthanization of the Montana Mountains bighorn herd occurred after nose-to-nose contact of one bighorn with domestic sheep in the Kings River Valley. The Double H herd must be protected from a similar fate. In addition, the EIS should disclose where lambing occurs for the Double H herd, and analyze the Project's impacts on lambing. Finally, because the Double H herd is a source stock for translocations, negative impacts to the Double H herd have potential to harm future bighorn translocation efforts throughout the state and even the region. The EIS should analyze these potential impacts.
Wildlife	Great Basin Resource Watch	We also note that it is the policy of the Nevada Department of Resources (NDOW) that "[t]he Division will increase bighorn populations of all subspecies statewide to a level where all habitats are occupied and each herd is self-sustaining."3 The impacts of this Project have potential to decrease NDOW's ability to achieve this, which should be discussed in the EIS, including as a potential conflict with a State wildlife plan. Furthermore, bighorn sheep are a BLM Nevada Sensitive Species, and are subject to direction included in Manual 6840, BLM's Special Status Species Management manual.10 Manual 6840 includes the objective of: "initiat[ing] proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA" (Objective 0.2 B). The manual further states that "[o]n BLM-administered lands, the BLM shall manage Bureau sensitive species and their habitats to minimize or eliminate threats affecting the status of the species or to improve the condition of the species habitat, by: 1. Determining, to the extent practicable, the distribution, abundance, population condition, current threats, and habitat needs for sensitive species, and evaluating the significance of BLM-administered lands and actions undertaken by the BLM in conserving those species. 2. Ensuring that BLM activities affecting Bureau sensitive species are carried out in a way that is consistent with its objectives for managing those species and their habitats at the appropriate spatial scale.
Wildlife	Great Basin Resource Watch	Manual 6840 at .2A1. In regard to bighorn, this Project clearly conflicts with Manual 6840. The EIS should disclose this conflict and discuss the measures BLM will take to mitigate that conflict.
Wildlife	Great Basin Resource Watch	Special attention to sensitive species like Sage Grouse need to be thoroughly considered. Thacker Pass borders on Priority sage grouse habitat, and many at the public meeting on February 6 stated the presence of sage grouse in and are the are where the mine is proposed. The sage grouse population above Thacker Pass and into the Montana range are connected to the larger population that extends into Idaho. This is considered a critical population and was part of the proposed minerals withdrawal noticed on September 24, 2015 by the Bureau of Land Management for Sagebrush Focal Areas; Idaho, Montana, Nevada, Oregon, Utah, and Wyoming.
Wildlife	Great Basin Resource Watch	In recent years, Nevada greater-sage grouse habitat has been devastated by wildfire, worsened by livestock grazing, ill-considered vegetation removal projects, mining projects and other development. The result is that greater sage-grouse are at ever increasing risk. The DEIS should provide well-developed baseline data about the local greater sage-grouse population, including long-term population trends, lek trends, genetic connectivity with other sage-grouse populations, accurate site baseline noise levels, and whether the grouse in the local Population Management Area include migratory grouse. The DEIS should also map designated and seasonal sage-grouse habitat. In addition, the DEIS should discuss how the Project will impact greater sage-grouse and its habitat, including but not limited to habitat modification and destruction, noise, roads, power lines, water quality and quantity changes, and potential for predation increases. BLM's 2015 Nevada/Northeastern California Sage-Grouse Approved Resource Management Plan Amendments (2015 Sage-Grouse ARMPA) is currently in effect. The DEIS should detail how this Project would conform to the 2015 Sage-Grouse ARMPA, including its net conservation benefit standard, as well as all of the other requirements of the ARMPA. The Project Applicant's proposed off-site mitigation should also be analyzed in detail, including its durability. We are particularly concerned about the Project's potential for noise impacts, especially in light of baseline noise readings that were collected for the area's prior exploration/clay mine Environmental Assessment. They appear too high for a rural area and should not be relied upon for this Project.

Issue Category	Organization	Comment*
Wildlife	Great Basin Resource Watch	Golden eagles are important to Nevada, and numbers may be declining in parts of their range. They are a native species. They nest here, raise their young here and live here year-round. Eagles are an inspiration to those who view them on the wing or on perch.
Wildlife	Great Basin Resource Watch	Golden eagles are fully protected under the Bald and Golden Eagle Protection Act, including protection from incidental take and disturbance. Electrocution of golden eagles by powerlines with faulty design is a major problem around the West. Such electrocutions have occurred along the powerline running beside State Hwy 140 a few miles west of Thacker Pass. Compensatory mitigation by the mining company for eagle disturbances around the mining operation should be used to modify faulty powerline design to eliminate golden eagle electrocution in Nevada and elsewhere in the West. The DEIS should thoroughly analyze the Project's potential impacts to golden eagles, such as habitat loss and mortality due to proposed and existing powerlines, and also provide baseline information about golden eagle use of the area. Because golden eagles use large home areas for foraging, the Project's habitat destruction has potential to reduce food sources for the eagles and in turn reduce breeding productivity and chick survival. Therefore, golden eagle nest surveys should be conducted in both the Montana and Double H Mountains, and observational surveys should be conducted at the Project site. The DEIS should also analyze the area's golden eagle population trends, prey population and prey population trends, and whether golden eagle incidental take/disturbance permits will be required. In addition, BLM should require golden eagle monitoring beginning with the Project construction phase and continuing into operations. The EIS should also include an Eagle Conservation Plan, developed with U.S. Fish and Wildlife Services, that contains substantial eagle mitigation measures.
Wildlife	Great Basin Resource Watch	Strict compliance with the requirements of the Bald and Golden Eagle Protection Act should be required if this proposed project is to move forward. Since it is unlikely that the proposed mining development will be unable to certify a no-impact statement regarding golden eagles, it is likely to seek an Eagle Take permit from USFWS based on disturbance (noise, etc). If so, compensatory mitigation must be part of the conditions for granting the permit.
Wildlife	Great Basin Resource Watch	The impacts of the Project on Lahontan Cutthroat Trout should be thoroughly analyzed in the DEIS, including, but not limited to, the Project's potential to cause hydrological changes and groundwater loss outside of the immediate Project area. The DEIS should also thoroughly explain the Endangered Species Act Section 7 consultation process and describe the discussions with U.S. Fish and Wildlife Service that have taken place to date.
Wildlife	Great Basin Resource Watch	An understanding of migratory routes needs to be resolved, and the impacts of the loss of these migratory routes from the various land disturbances should be addressed. BLM needs to produce a solid evaluation of the proposed mitigation strategy for this (and any other) migratory route including data of how similar mitigation methods have been effective elsewhere.
Wildlife	Public	Dear BLM...that mine will occur in golden eagle territory. Eagles are an important part of Nevada's heritage. I've been told their population may be declining in some parts of the range. Electrocution from power lines is a real problem. I suggest that the requirements of the Bald and Golden Eagle Protection Act be followed closely in going forward with this proposal. If the mine receives an eagle "take" permit for "disturbance", compensatory mitigation should be part of the permit requirement so power lines in Nevada and elsewhere can be modified to reduce golden eagle deaths.
Wildlife	Public	I have lived in NV since childhood and one of the joys of living here is being a wildlife watcher and enjoying the open spaces we have. I consider this project to be a threat to sensitive species that I love as well as to the quality of my life as a Nevadan and as a US citizen.
Wildlife	Theodore Roosevelt Conservation Partnership	Greater Sage Grouse: The entire area of Thacker Pass and the Lithium Mine Project overlaps Priority Sage Grouse Habitat (PHMA). A major sage grouse lek is located approximately 0.75 miles north of the northern project boundary. Noise from mining-related activities could seriously impact this lek. Noise and lek success should be monitored and appropriate mitigation measures required such as seasonal stipulations limiting noise levels certain times of the day during the breeding season.

Issue Category	Organization	Comment*
Wildlife	Theodore Roosevelt Conservation Partnership	Lahontan Cutthroat Trout: Several streams in the Montana Mountains, including Pole Creek, contains critical habitat for Lahontan Cutthroat Trout. The lower reaches of Pole Creek would be directly impacted by the Thacker Pass Lithium Project. Avoidance and/or mitigation should be required for impacts to this fishery.
Wildlife	Theodore Roosevelt Conservation Partnership	California Bighorn Sheep: The bighorn population in the Montana Mountains suffered a severe die- off due to pneumonia in 2015-2016 resulting in a complete loss of the population. Bighorn in the Double H Mountains to the south did not experience the same event. In time, it is likely bighorn from the Double H Mountains will serve as replacement stock for the Montana herd as those animals naturally pioneer north through Thacker Pass. The Nevada Lithium mine would present a near complete barrier to that emigration of bighorn from one range to the other. The mine would also present a barrier to the long-term connectivity and viability of the two sub-herds. This movement has been well documented in the past prior to the disease event in the Montana Mountains. Bighorn year-round range in the area of Thacker Pass overlaps with the western end of the proposed project. This would also have a negative impact on bighorn. Nevada's bighorn sheep herds are an extremely important big game species to hunters from all over the world as evidence by the high demand for hunting permits and the conservation efforts accomplished in Nevada through sporting organizations over the last four decades. Like other species of big game mentioned here, all seasonal ranges used by bighorn sheep should be considered, managed and conserved.
Wildlife	Theodore Roosevelt Conservation Partnership	Pronghorn antelope: Pronghorn antelope movement corridors overlap the entire proposed mine development area. As with all species of migratory big game, all seasonal ranges – including migration corridors and stopover habitat (per Secretarial Order 3362) – should be considered, managed and conserved.
Wildlife	Theodore Roosevelt Conservation Partnership	Mule Deer: The Winnemucca District contains important mule deer range. The Thacker Pass Lithium Mine Project overlaps with year-round range and is within five miles of crucial winter range for mule deer, which could be adversely impacted by the surface disturbing activities of the project. To remain healthy, mule deer populations require unfragmented, functional habitats and unfettered migration corridors and stopover habitat.
Wildlife	Trout Unlimited	Lithium Nevada has demonstrated they considered the local community, and the positive and negative impacts associated with their operations during their initial communications with interested parties. Refraining from additional exploration and proposed development on top of the Montana Mountains is of paramount importance to Trout Unlimited. The Montana Mountains harbor critical habitat for Lahontan Cutthroat Trout, as well as some of the best Greater Sage-Grouse habitat in the state. Working within the footprint that is identified in the Scoping documents is imperative to have meaningful analysis of impacts to fish and wildlife. We would be opposed to any expanded development on top of the Montana Mountains.
Wildlife	Trout Unlimited	Thacker Reservoir has been a recreational fishery, stocked by the Nevada Department of Wildlife over the years. Lithium Nevada could provide the community with another location that would provide an accessible fishing pond for anglers and youth to enjoy, in lieu of Thacker Reservoir that is located so close to the proposed mining operations. Although the water quantity and quality is not expected to be diminished, the Thacker Reservoir will not have recreational appeal due to its proximity to operations. The local community, NDOW, and fishing clubs might be consulted through an alternative location selection process.
Wildlife	Earthworks	We are concerned about the projects impacts on wildlife, particularly sage grouse, bighorn sheep, raptors, and Lahontan cutthroat trout. The area is vital habitat for these sensitive species, especially just north of the proposed mine area in the Montana Mountains where there is potential for later expansion. Lithium Nevada did state publically that the company has no plans to expand there. However, they still hold mining claims all throughout the Montana Mountains, and the parent company Lithium Americas has not made any promises.

* The text of comments is presented as received by the BLM in each comment letter.