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An Environmental Assessment of Rockwood Lithium Inc.'s Proposed Goat Island Mineral Material Sale

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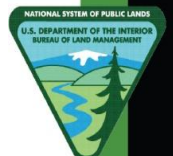


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1.0 INTRODUCTION

Rockwood Lithium, Inc., (Rockwood) has submitted an application to the Bureau of Land Management (BLM) for a non-competitive purchase of rip rap and clay materials from the existing Goat Island mineral materials pits. The mineral material pits are located on public lands administered by the BLM, Battle Mountain District, Tonopah Field Office (BLM-TFO).

Rockwood's application requests the purchase of 20,000 cubic yards of clay and 20,000 cubic yards of rip-rap per year over the next 5 years (100,000 cubic yards each). These materials would be used to maintain dikes on existing lithium evaporation ponds and for the construction of dikes and the lining of future ponds situated on Rockwood's mining claims. The extraction of these materials would involve the drilling of rock at the Goat Island rip rap pit, and the skimming of clay from the playa floor at the Goat Island clay pit. Material would be segregated and stockpiled until needed.

There is approximately 6 acres of existing disturbance at the rip-rap pit and about 30 acres at the clay pit. Up to an additional 14 acres of disturbance would be created at the clay pit over the 5-year period. The current disturbance footprint would increase slightly (< 1 acre) at the rip-rap pit as material is extracted from the mid-elevations to the bottom of Goat Island.

During reclamation activities, the vertical sides of the clay pit and the excavation associated with the rip rap excavation would be sloped to 3:1. Slopes would be graded to provide a stable slope and no high wall would remain.

The approval of the mineral material application is a federal action subject to analysis under the National Environmental Policy Act (NEPA) of 1969 (Public Law [PL] 1-91-190, as amended [42 United States Code (USC) 4321 *et seq.*]). Due to the amount of disturbance involved in removing the materials and the quantities of material proposed for removal, the BLM-TFO has determined that an environmental assessment (EA) is required prior to the potential approval of the mineral materials application. The EA will analyze the direct, indirect, and the cumulative impacts of removing the material to determine if significant impacts would occur that would require the development of an environmental impact statement (EIS).

1.1 Purpose and Need for Action

The purpose of the action is to provide Rockwood with authorized use of the public land managed by the BLM to extract mineral materials in compliance with the Federal Land and Policy Management Act of 1976 (FLPMA), Federal regulations at 43 CFR§ 3600 and other applicable federal and state laws. The need for the action is to respond to Rockwood's application to purchase, through non-competitive sale, rip-rap and clay material in support of their lithium processing operations.

1.2 Land Use Plan Conformance

The Proposed Action is in conformance with the Tonopah Resource Management Plan (RMP) and Record of Decision approved on October 2, 1997.

The Mineral Materials Objective as stated in the Tonopah RMP (page 23) is to, “Provide for the extraction of mineral materials such as sand, gravel, building stone, cinders, etc., to meet public demand.”

It has been determined that the area of the proposed sale is within an area that is designated as open to mineral material disposal under standard terms and conditions. Management direction presented in the RMP is to, “Continue to provide mineral materials from existing authorized sources unless closed to meet specific management objectives of other resources (Tonopah RMP, page 23).”

1.3 Relationship to Statutes, Regulations, Policy, Plans or Other EAs

The Act of July 31, 1947 as amended (30 U.S.C. 601 et seq.) gives authority for the disposal of mineral materials from public lands of the United States. Section 302 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1732) directs the Secretary to manage public lands under the principles of multiple use and sustained yield in accordance with the land use plan developed under the act.

The 43 CFR § 3600 regulations establish procedures for the exploration, development and disposal of mineral material resources under contract or permit for sale or free use. Activities occurring on public lands are subject to all Federal, State, and local regulations concerning health and safety.

1.4 Scoping and Public Involvement

This proposal was internally scoping by BLM specialists. Several issues emerged during the scoping effort which included:

- What would be the nature and extent of impacts to migratory birds?
- What would be the extent of impacts to soils?
- How might special status animal species be affected?
- What would be the visual resource impacts of the proposal?

Comments were solicited from the Nevada Department of Wildlife (NDOW) in e-mail dated May 7, 2014. NDOW indicated that they had no concerns with regards to the project and no new biological surveys would be required as long as no blasting associated with rip-rap extraction would take place.

A certified letter was sent to the Timbisha Shoshone Tribe on May 14, 2014 asking if they had any comments and concerns in relation to the project. The Tribe indicated that since the area was previously disturbed and no blasting would occur they had no comments or concerns.

2.0 THE PROPOSED ACTION AND ALTERNATIVES

2.1 The Proposed Action

Rockwood Lithium, Inc. has submitted an application for a non-competitive mineral material sale of 100,000 cubic yards of rip-rap and 100,000 cubic yards of clay to be extracted from existing pits located in sections 13, 14, and 23 T. 2S., R39E., Mount Diablo Base & Meridian, Esmeralda County, Nevada (Figures 1 and 2).

As proposed, the materials would be extracted over a 5-year period (20,000 cubic yards per commodity per year). These materials are required by Rockwood to maintain dikes on existing lithium evaporation ponds and for the construction of dikes and the lining of future ponds situated on Rockwood's mining claims.

In order to produce a product useful as rip-rap, the rock located at the Goat Island pit would be drilled and mechanically reduced into blocks of between 6 and 24 inches in diameter. Once reduced, the rock would be pushed into piles, loaded onto dump trucks, and either taken directly to where it is needed or stockpiled in case of emergency dike breaches. The extraction of the rip rap would slightly increase the current disturbance footprint of 6 acres at the Goat Island location as material is extracted from the mid-elevations to the bottom of the island.

Clay would be extracted by skimming the playa floor in thin layers, where it would be piled, and loaded on to dump trucks. The clay pit is inaccessible during rain events, typically when it is needed most. As such, stockpiling to a limited extent is necessary. The extraction of clay material would increase the current disturbance footprint of approximately 30 acres by an additional 14 acres over the 5-year period.

Access to the sites would be by existing dirt roads. There would be no waste products or impoundments associated with these mining activities. Blow sand which is removed from the underlying clay would be used to cover and fill clay pit excavations once the material is extracted. Water would be hauled to the sites to abate fugitive dust associated with drilling activities and vehicular and equipment traffic (Appendix A).

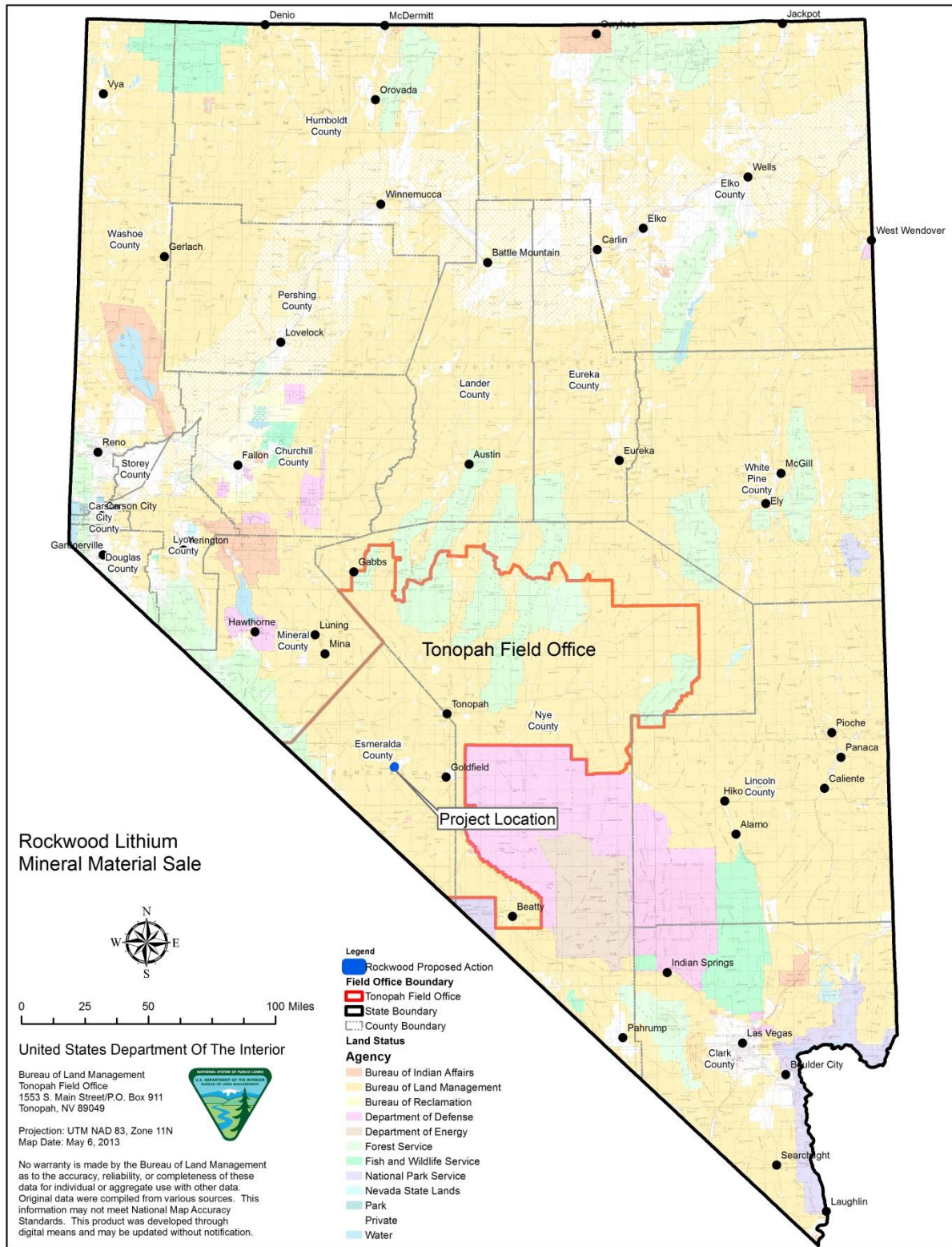


Figure 1. Locational map of the proposed Mineral Material Sale.

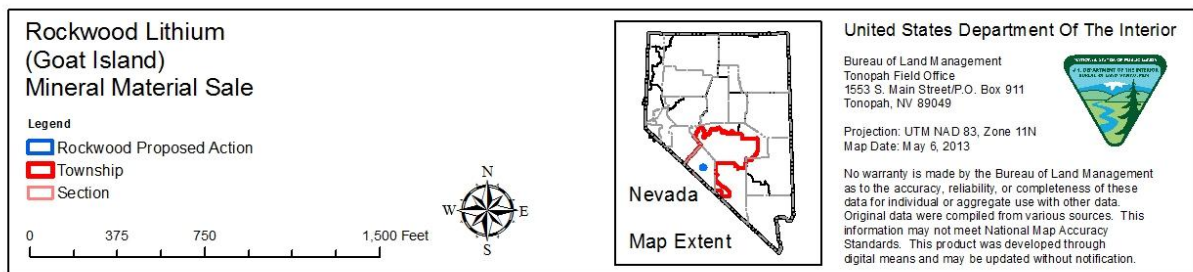
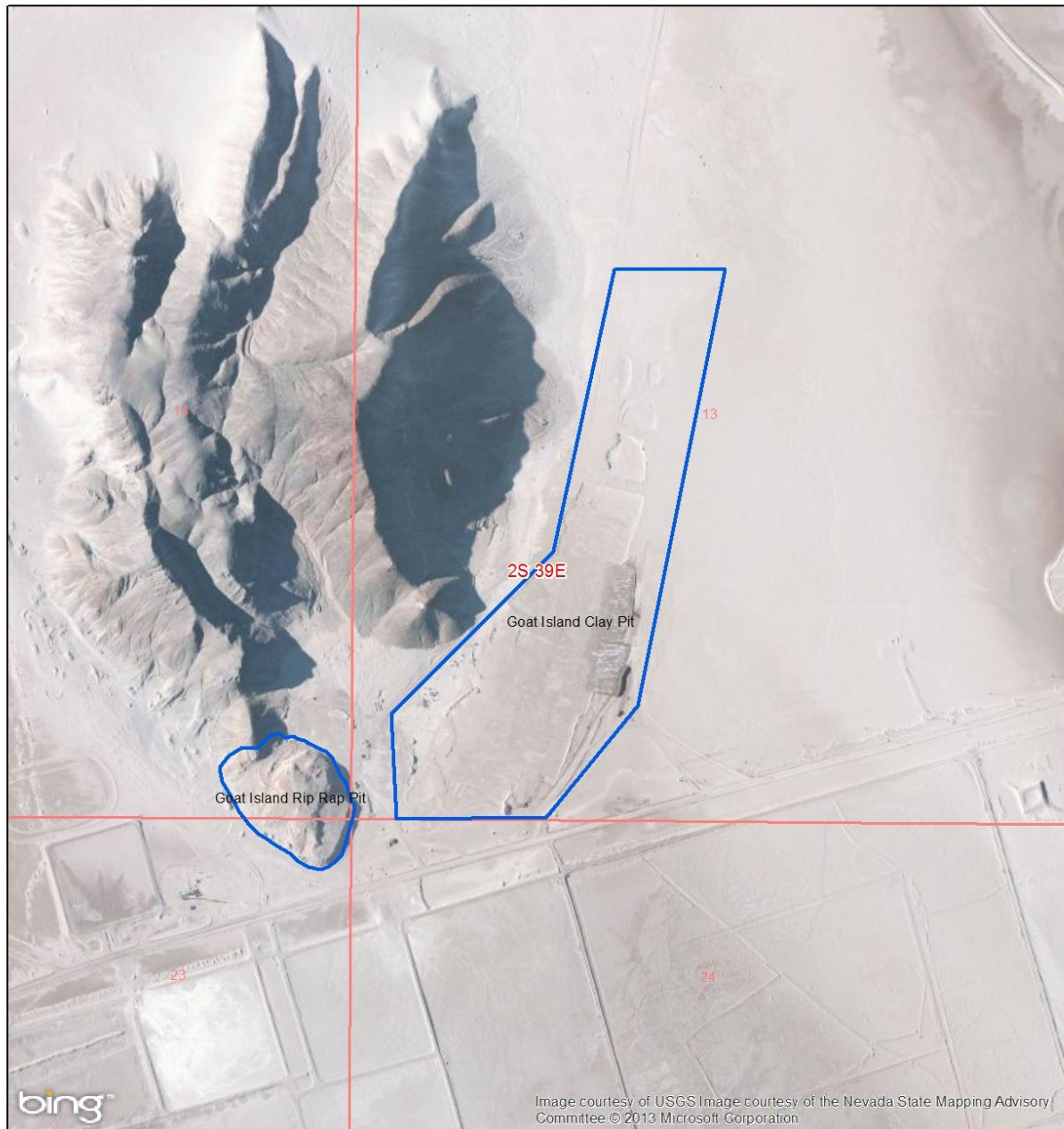


Figure 2. Location of the proposed Mineral Material Sale.

2.2 No Action Alternative

Under the No Action alternative, the application for a non-competitive mineral material sale would be denied and the mineral materials would remain in place. If the application is denied, Rockwood would be compelled to find another location to mine mineral materials for their operational needs.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The purpose of this section of the EA is to describe the existing environment of the proposed project area. Supplemental Authorities that are subject to requirements specified by statute or Executive Order (EO) must be considered in all BLM environmental documents. The elements associated with the supplemental authorities listed in Appendix 1 of the NEPA Handbook (BLM 2008) and in the Nevada Instruction Memorandum (IM) 2009030, Change 1, are listed in Table 1. The table lists the elements and provides a determination of whether the element is present in the project area and if it would be affected by the Proposed Action.

3.1 Supplemental Authorities

Supplemental Authorities that may be affected by the Proposed Action are analyzed in Section 3.3. Those elements listed under the supplemental authorities that do not occur in the project area and would not be affected are not discussed further in the EA, based on the rationale provided in the following table. The elimination of non-relevant issues follows the Council on Environmental Quality (CEQ) policy, as stated in 40 CFR §1500.4. The potential effects of the No Action Alternative are also discussed under Section 3.3.

Table 1. Supplemental Authorities Considered in the Analysis.				
Supplemental Authority ¹	Not Present ²	Present/Not Affected	Present/May be Affected ³	Rationale
Air Quality		•		While fugitive dust would be generated by drilling, piling and hauling activities, water would be used to mitigate any effects to air quality.
Area of Critical Environmental Concern (ACEC)	•			There are no ACECs within or near the proposed project area.
Cultural Resources	•			The results of a Class III cultural resource survey indicate that there are no cultural resources within the proposed project area.
Environmental Justice		•		The Proposed Action would not result in disproportionate impacts to minority or low income populations.
Farmlands Prime or Unique	•			There are prime or unique farmlands within or near the proposed project area.
Noxious Weeds/ Invasive Non-native Species	•			The proposed project area is located on a rock outcrop and playa surface where no vegetation of any kind, including noxious weeds and invasive, non-native

¹ See H-1790-1 (January 2008) Appendix 1 Supplemental Authorities to be Considered.

² Supplemental Authorities determined to be Not Present or Present/Not Affected need not be carried forward for analysis or discussed further in the document.

³ Supplemental Authorities determined to be present/May be Affected must be carried forward for analysis in the document.

Table 1. Supplemental Authorities Considered in the Analysis.				
Supplemental Authority ¹	Not Present ²	Present/Not Affected	Present/May be Affected ³	Rationale
				species, grows.
Native American Religious Concerns	•			There are no known Native American Religious Concerns within or near the project area.
Floodplains		•		Although part of the proposed project area is located on a 100-year floodplain, the amount of disturbance proposed is negligible in relation to the size of the floodplain.
Riparian/Wetlands	•			There are no riparian areas or wetlands located within or near the proposed project area.
Threatened and Endangered Species	•			There are no threatened or endangered plant or animal species or their habitat within or near the proposed project area.
Migratory Birds			•	Impacts are disclosed under the section titled, Migratory Birds
Waste – Hazardous/Solid	•			There is currently no hazardous or solid wastes located within the project area nor would the proposed activities result in its creation.
Water Quality (Surface and Ground)		•		There would be no effect to surface or groundwater quality because no surface waters or groundwater exposures occur in the project area.
Wild & Scenic Rivers	•			There are no wild and scenic rivers located within or near the proposed project area.
Wilderness/WSAs/Lands with Wilderness Characteristics	•			There are no wilderness areas, WSAs or lands with wilderness characteristics located within or near the proposed project area.
Forests and Rangelands (HFRA only)	•			The Proposed Action is not a HFRA-related proposal, thus the HFRA does not apply.

3.2 Other Resources Considered in the Analysis

Other resources of the human environment that have been considered in this environmental assessment (EA) are listed in the table below. Elements that may be affected are further analyzed in the EA. Rationale for those elements that would not be affected by the Proposed Action and alternative is listed in the table below.

Table 2: Other Resources Considered in the Analysis.				
Other Resources	Not Present ⁴	Present/Not Affected	Present/May be Affected	Rationale
Grazing Management		•		The Proposed Action would not affect grazing management because there is no forage within the project area.
Land Use Authorizations		•		No new land use authorizations would be required to implement the Proposed Action.
Paleontological Resources	•			The results of a paleontological survey of the Goat Island outcrop indicate that that there are no scientifically important fossil materials located the proposed project area.
Recreation	•			There are no known recreational activities that occur in the proposed project area due to Rockwood Lithium's adjacent lithium evaporation and processing facilities.
Socio-Economic Values		•		The Proposed Action would result in no impact to socio-economic values because it implementation would not result in an increase in county revenues or local or regional employment.
Soils			•	Impacts are disclosed in the section titled, Soils .
Special Status Species			•	There are no special status plant species within the project area. Impacts to special status animal species are disclosed in the section titled, Special Status Species .
Vegetation	•			There would be no impacts to vegetation because the proposed project area consists of a rock outcrop and playa surface where no vegetation is present.
Visual Resources			•	Impacts are disclosed in the section titled, Visual Resources .
Wild Horses and Burros	•			There are no wild horse and burro HMAs located within or near the proposed project area.
Wildlife		•		There is negligible use of the project area by wildlife species other than incidental small mammal and reptiles. Wildlife habitat is extremely limited due to soil type and lack of vegetation. Additionally, the duration of previous disturbance within the vicinity of the project area is significant enough that resident species have already abandoned

⁴ Other Resources determined to be Not Present or Present/Not Affected need not be carried forward for analysis or discussed further in the document based on the rationale provided.

Table 2: Other Resources Considered in the Analysis.				
Other Resources	Not Present⁴	Present/Not Affected	Present/May be Affected	Rationale
				the area, or are accustomed to the ongoing disturbance. Adjacent habitat is plentiful.

3.3 Effects Analysis

3.3.1 Migratory Birds

Affected Environment

Migratory birds could be found in the project area as either seasonal residents or as migrants. Use of the project area by avian species in general is limited due to the lack of sufficient soils for vegetative growth through most of the project area, excluding Goat Mountain. The Goat Mountain rock outcropping immediately adjacent to the project area could support limited foraging and adequate nesting habitat for some migratory birds, primarily ledge or cliff nesting raptors. However, no nests, whitewash or raptor individuals were identified during the project area survey conducted on February 18, 2014. Additionally, the project area contains, and is adjacent to, areas with ongoing disturbance (see Figure 2).

Raptors have been known to nest and forage within Clayton Valley. Based on BLM and Nevada Division of Wildlife (NDOW) data, five prairie falcons, and one red-tailed hawk have been documented within ten miles of the project area since 2007. No known raptor nests have been documented within 4 miles of the project area.

Environmental Consequences of the Proposed Action on Migratory Birds

Migratory bird individuals present would likely move into adjacent areas due to habitat disturbance, potentially competing with other individuals or individuals of other species for foraging and nesting habitat. However, considering the size of the proposed disturbance, the presence of existing and nearby disturbance, location (as it relates to soils, vegetation and topography) of the project area, and abundance of adjacent habitat, impacts to migratory birds are considered to be negligible. Additionally, the distance from the project area to adequate nesting habitat for migratory birds (other than raptors) is in excess of 100 meters, which is the standard distance for required surveys according to the Battle Mountain Migratory Bird Survey Protocol. Therefore, migratory bird surveys for species other than raptors would not be required for surface disturbance activities conducted during the migratory bird nesting season (1 March - 31 July).

The likelihood of raptor nesting adjacent to the project area (on Goat Mountain) is greater than for other migratory birds. Although no raptor nests have been documented on Goat Mountain in the past, yearly surveys for occupancy would be prudent, as adequate nesting habitat exists. Raptor surveys would be required for surface disturbance activities during the raptor nesting

season (1 March – 31 July) in accordance with Rockwood Lithium's Avian Protection Plan (APP; EDM International 2013).

Environmental Consequences of the No Action Alternative on Migratory Birds

No consequences associated with the No Action Alternative are anticipated beyond the impacts related to the approved activities.

3.3.2 Soils

Affected Environment

According to the USDA NRCS web soil survey, the project area is located within the 900 Playa soil type (<http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>). This soil is moderately to strongly saline which makes it unsuitable for the growth of vegetation. The soil type is very poorly drained and is characterized by very low to moderately low capacity to transmit water. As consequence of these properties, ponding is frequent on this soil type. A typical soil profile is relative simple; 0 to 6 inches is a silty clay loam, while depths up to 60 inches consist of a silty clay. The Goat Island Clay Pit contains approximately 30 acres of existing disturbance to an approximate depth of 20 inches, which is well into the desirable silty clay portion of the soil profile.

The Goat Island Rip rap pit, which is actually well above the grade of the playa surface, consists primarily of volcanic rock with little to no soil development.

Environmental Consequences of the Proposed Action on Soils

The implementation of the Proposed Action would result in removal of an additional 100,000 cubic yards of silty clay from the Goat Island Clay pit over the next five years. The disturbance, which approximates 14 acres, would be relatively shallow and extensive rather than deep. The excavated area would be susceptible to ponding during precipitation events. Given the size of the disturbance relative to the size of the Clayton Valley playa the impacts would be negligible. The proposed disturbance area would remain until reclamation is completed.

Environmental Consequences of the No Action Alternative on Soils

No impacts to soils associated with the No Action Alternative would occur beyond those resulting from previously authorized activities.

3.3.3 Special Status Species

Affected Environment

Special status species that may occur within Clayton Valley and surrounding mountains were referenced against their habitat requirements and compared to habitat present within the project

area. The following species were determined to have potential to occur within or near the project area: desert bighorn sheep, golden eagle, and peregrine falcon.

The Nevada Division of Wildlife (NDOW) desert bighorn sheep habitat data indicate that the project area is 1.4 miles from occupied year-round habitat. Incidental use of Goat Mountain as winter range is possible, but unlikely due to lack of vegetation, continued human presence and disturbance within and adjacent to the project area.

Raptors with special status have been known to nest and forage within Clayton Valley. Based on BLM and NDOW data, one golden eagle nest has been documented within ten miles of the project area since 2007.

Environmental Consequences of the Proposed Action on Special Status Species

Special status individuals present within or in vicinity of the project area would likely move into adjacent areas due to habitat disturbance, potentially competing with other individuals or individuals of other species for foraging and reproductive habitat. However, considering the size of the proposed disturbance, the presence of existing and nearby disturbance, location (as it relates to soils, vegetation and topography) of the project area, abundance of adjacent habitat and mobility, impacts to desert bighorn sheep are considered to be negligible.

Although no special status raptor nests have been documented within the project area or adjacent habitat (i.e., other areas of Goat Island) in the past, yearly surveys for occupancy would be prudent, as adequate nesting habitat exists. Raptor surveys would be required for surface disturbance activities during the raptor nesting season (1 January – 31 July) in accordance with Rockwood Lithium's Avian Protection Plan (APP; EDM International 2013). Two different surveys would be required for disturbance within the aforementioned timeframe, as peregrine falcon (1 April) and golden eagle (1 January) begin their nesting seasons at different times of the year. If active nests are located within 0.75 mile for golden eagles or 1 mile for peregrine falcons, Rockwood Lithium would either suspend operations to the end of July or apply for a take permit in consultation with the United States Fish and Wildlife Service (USFWS). Prior surveys have not located active nests within these distances, however, and it is unlikely that the Proposed Action would have an impact on these species.

Environmental Consequences of the No Action Alternative on Special Status Species

No adverse consequences associated with the No Action Alternative are anticipated beyond the impacts related to previously approved activities.

3.3.4 Visual Resources

Affected Environment

The project area is located in a Class IV Visual Resource Management (VRM) area. The Class IV objective allows for contrasts that may attract attention and be a dominant feature of the landscape in terms of scale; however, the change should repeat the basic elements inherent in the

characteristic landscape. The level of change to the characteristic landscape can be high.

Environmental Consequences of the Proposed Action on Visual Resources

The rock and clay extraction areas would be visible and the operation likely noticeable in the foreground-middle ground zone of three to five miles from the location. At greater distances, the extraction area would fall into the background zone and be less discernible due both to distance and the varying patterns of the mountainous background.

These activities are within the allowable limits of Class IV Visual Resource Management areas identified in the Tonopah RMP and Record of Decision, 1997.

Environmental Consequences of the No Action Alternative on Visual Resources

Under the No Action alternative, there would be no change to the existing visual environment.

4.0 CUMULATIVE EFFECTS

The Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR 1508.7) define cumulative impacts as:

“ . . . the impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”

The following analysis identifies impacts associated with past, present, and reasonably foreseeable future actions and evaluates the contribution of the Proposed Action to the collective impact.

The Cumulative Effects Study Area (CESA) for the analysis is the northeastern portion of the Clayton Valley playa. The CESA, which comprises approximately 28,256 acres, is bounded on the west by State Hwy 265 and the town of Silver Peak and by alluvial fans on the north, east, and south (Figure 3). Five years forms the temporal framework for the analysis because this is the timeframe in which impacts associated with the Proposed Action would occur.

4.1 Past and Present Actions

Past and present activities that have had environmental effects within the CESA consist primarily of lithium production activities, mineral material extraction, residential development and geothermal exploration drilling.

Lithium Production

Rockwood Lithium, Inc. currently operates a lithium brine mining and processing facility in the area, and has been extracting lithium from the playa brines since 1965. The facilities consist of a series or circuit of shallow ponds in which brine pumped from subsurface waters is contained for evaporation. Over the years, Rockwood and its predecessor entities have expanded their operation and currently these ponds cover approximately 6,178 acres or about 22 percent of the CESA.

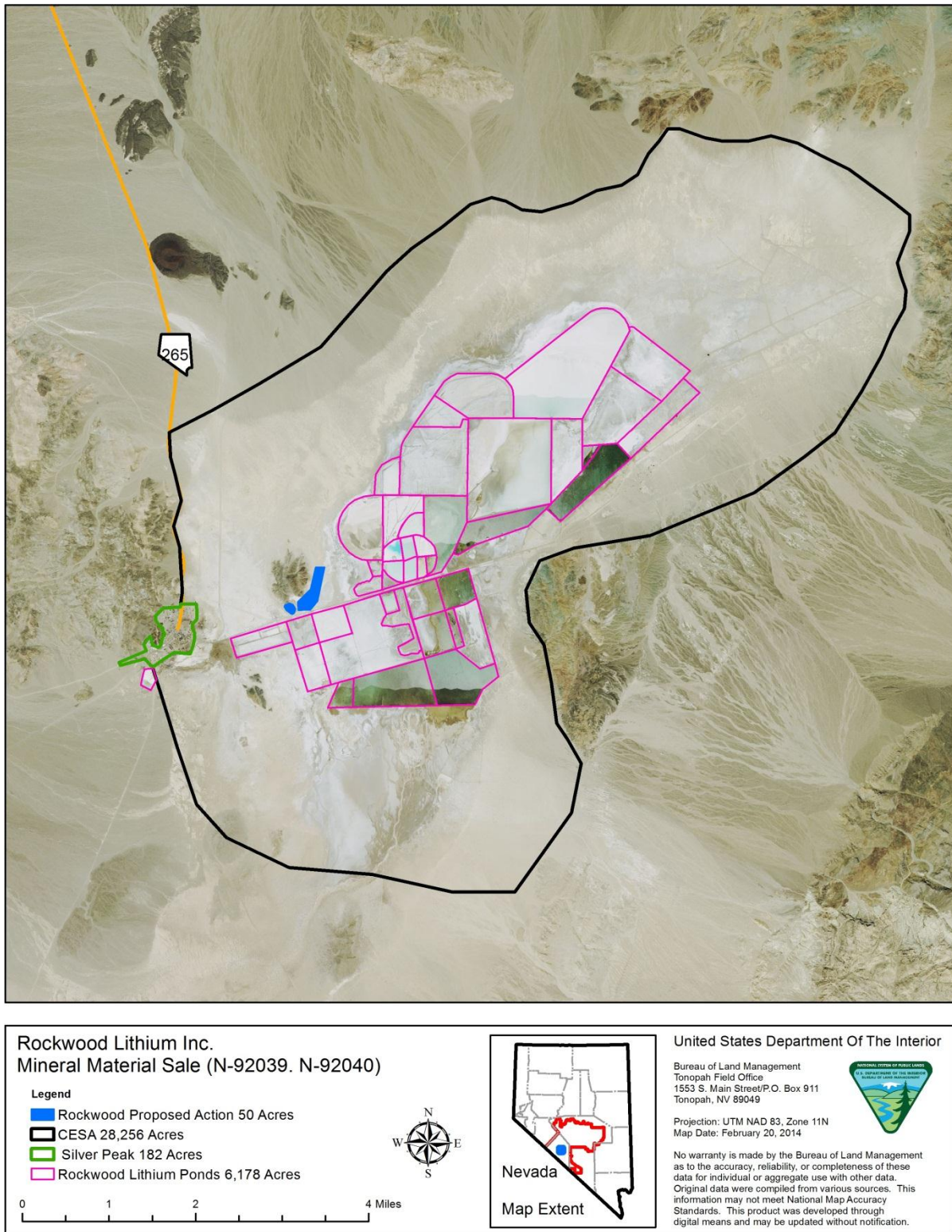


Figure 3. The Cumulative Effects Study Area (CESA).

Mineral Materials Extraction

Two areas in the west-central and western portions of the CESA have been impacted by mineral materials extraction. The first, which is located near the town of Silver Peak, is a free use sand and gravel pit used by the Esmeralda County Road Department. The pit, which has existed for at least 20 years, is rarely used by the county. Nevertheless, past activity at the pit has disturbed approximately 5 acres.

The other location of past and present mineral material extraction is within or immediately adjacent to the current Goat Island project area. Over the last 15 years, Rockwood Lithium, Inc. and its predecessors have removed rip-rap and clay materials from this location to maintain dikes on existing lithium evaporation ponds and for the construction of dikes and the lining of future ponds. Approximately 40 acres of the CESA has been disturbed to this point in time.

Residential Development

Residential development is limited to the town of Silver Peak, located on the western periphery of the CESA. The town has a long history being founded in the late Civil war era as a silver mining camp. In the early part of the 20th century, the town was the home of a 20-stamp mill for processing silver ores. In more recent times, the town has benefited from lithium processing activities which replaced silver mining as the primary source of employment in the mid-1960s, as it does today. While the size of the town probably fluctuated through the years, it currently occupies approximately 182 acres of the CESA.

Geothermal Exploration Drilling

The CESA has been the focus of limited geothermal exploration drilling in recent years. Two projects have been permitted by the BLM to date. The first, known as the Silver Peak Geothermal Exploration Project, proposed the construction of up to six well pads and the drilling of 14 Temperature Gradient Holes (TGHs) and a single observation well. As proposed, the project was projected to disturb approximately 26 acres of the CESA. Ultimately, 10 TGHs and the observation well were drilled. The project area has been successfully reclaimed.

The second project, known as the Silver Peak Area Geothermal Exploration Project, originally proposed the construction of two well pads and the drilling of an observation well and 2 full-size exploration wells which were to disturb about 6 acres of the CESA. One observation well and a single TGH were drilled with unfavorable results and the project was never fully implemented. Disturbance associated with this project has also been reclaimed.

4.2 Reasonably Foreseeable Future Actions

At the current time, the BLM has no evidence that actions are likely to change in kind within the CESA. That is, no new types of actions other than those discussed under past and present actions are likely to occur. It is further assumed that lithium production, mineral materials extraction, and residential development will remain more or less static during the 5-year timeframe considered in this analysis.

However, it is reasonably foreseeable that in the next 5 years additional geothermal exploration activities could occur within the CESA. In April of 2011, the BLM approved the Clayton Valley Geothermal Exploration Project. As proposed, the project would involve the construction of 17 well pads and a limited amount of new road construction. These activities would result in approximately 42 acres of new ground disturbance. To this point, the BLM has not received any Geothermal Drilling Permit applications (GDPs) and it is not clear if the proponent will implement any aspects of the proposal.

4.3 Cumulative effects associated with past, present, and reasonably foreseeable future actions, including the Proposed Action

Cumulative Impacts to Migratory Birds

Past, present, and reasonably foreseeable future action have resulted in approximately 220 acres of direct habitat loss. Migratory birds have been displaced over a larger area due to human presence. The majority of these impacts are associated with residential development, since lithium processing areas lack quality migratory bird habitat and geothermal exploration drilling is typically short-term. The Proposed Action would contribute little to the collective impact because of the lack of vegetation in the project area and the implementation of Rockwood Lithium's avian protection plan and associated raptor surveys which are specifically designed to minimize impacts to migratory bird species (EDM International 2013).

Cumulative Impacts to Soils

Approximately 6,450 acres of the soils within the CESA have been disturbed by past, present and reasonably foreseeable future action. The majority of this disturbance is associated with the development of past and present lithium evaporation ponds, which has resulted in the shallow excavation of playa soils across approximately 6,180 acres or about 22 percent of the CESA. The development of the ponds has had little effect on wind and water erosion potential because they are typically filled with lithium-bearing brines. The balance of soil disturbance, which has increased the potential for wind and water erosion to a limited degree, is associated with the relatively small acreage related to residential developments.

The Proposed Action would disturb an additional 14 acres of playa soils. The excavation of these silty clays would add little to wind and water erosion potential because these soils are not particularly susceptible to erosion. In addition, slopes would be graded to provide a stable slope and no high wall would remain to prevent erosion. The proposed activities at the rip rap pit would have little to no cumulative effect on soils since there is little to no soil development at that location.

Cumulative Impacts to Special Status Species

Past, present and reasonably foreseeable future actions have had relatively little effect on special status species because the CESA provides very limited nesting and foraging habitat. The Proposed Action may disturb raptors nesting on areas of Goat Island that are not within the project area. However, the implementation of Rockwood Lithium's Avian Protection Plan

(EDM International 2013) would require annual surveys for raptor raptors. If active raptor nests are near the project area (0.75 miles for golden eagle nests and 1 mile for peregrine falcon nests) either operations would be suspended until the end July or Rockwood Lithium could apply for a take permit in consultation with the USFWS. There are not known active nests within these distances from the project area, however, and there is not likely to be any contribution to cumulative impacts associated with the Proposed Action.

Cumulative Impacts to Visual Resources

Past, present and reasonably foreseeable future actions have altered the characteristics of the visual landscape across approximately 6,450 acres or about 23 percent of the CESA. The majority of the alteration is associated with the development of lithium evaporation ponds. While visible from the foreground zone if approached from the east, the ponds are highly visible from the background zone if approached from the higher elevations along State Highway 265 to the north.

Due to their position on the landscape relative to the path of existing roads, residential developments are not visible until they are in the foreground zone and, as such, contribute little to visual impacts at greater distances. The Proposed Action would contribute in a minor way to visual impacts in the CESA because the mineral materials extraction activities would be noticeable in the foreground-middle ground zone of three to five miles, though at greater distances would not be discernable. Once reclamation activities are completed, the contribution of the Proposed Action to cumulative visual impacts would be reduced to the foreground zone and even then would be difficult to discern.

5.0 TRIBES, PERSONS, ORGANIZATION, or AGENCIES CONSULTED

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APPENDIX A

MITIGATION MEASURES

**Mitigation Measures associated with Rockwood Lithium Inc.'s
Proposed Goat Island Mineral Material
Sale
DOI-BLM-NV-B020-2013-0049-EA**

1. Water shall be used to abate fugitive dust associated with removal and hauling operations.
2. The entire excavation area shall be sloped to a ratio no greater than 3:1, and the floor of the excavation shall be graded to present a neat and uniform appearance.
3. Stockpiles and waste piles shall only be maintained during periods of active use. During periods of non-use, waste materials shall be re-contoured into depleted areas of the pit.
4. The pit shall not be used for the long term storage of trash, debris, or equipment.
5. All operators must comply with applicable Federal and State laws dealing with the storage and disposal of chemicals, petroleum, petroleum products, RCRA Subtitle D solid and RCRA Subtitle C hazardous wastes. Under no circumstances are chemicals, petroleum, petroleum products, or RCRA Subtitle C hazardous wastes to be disposed of onto the Public lands. In addition, the operator must comply with all other applicable Federal, State, and local regulations during operations on Public lands.
6. Any cultural and/or paleontological resources (historic or prehistoric site or object) discovered by operator, or any persons working on his behalf, on public or federal land shall be immediately reported to the Tonopah Field Office Authorized Officer, BLM at (775) 482-7800. The operator shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the BLM Authorized Officer. An evaluation of the discovery will be made by the BLM to determine appropriate actions to prevent the loss of significant cultural or scientific values. The operator shall be responsible for the cost of evaluation and any decision as the proper mitigation measures shall be made by the Authorized Officer, BLM, after consulting with the operator.
7. Due to the distance to adequate nesting habitat, migratory bird surveys would not be required prior to the extraction of mineral materials. However, raptor surveys would be required for surface disturbance activities during the raptor nesting season (1 January – 31 July) in accordance with Rockwood Lithium's Avian Protection Plan (APP). Two different surveys would be required for disturbance within the aforementioned timeframe, as peregrine falcon (1 April) and gold eagle (1 January) begin their nesting seasons during different periods of the year. If active nests are located within 0.75 miles for golden eagles or 1 mile for peregrine falcons, Rockwood Lithium would either suspend operations to the end of July or apply for a take permit in consultation with the USFWS.
8. A record of material removed under this contract shall be provided to the Authorized Officer, BLM. If payment is made in installments, the first installment must be paid before BLM approves the contract. Once material has begun to be moved, subsequent installment payment must be made monthly in an amount equal to the value of materials removed in the previous

month. Payment must be made by the 15th day following the end of the month for which the record of material removed is reported. The total purchase price must be made not later than 60 days prior to the expiration of the contract.