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Comments: I am writing to express my concerns regarding the proposed exploration project and its potential impacts on public lands, wildlife habitat, sensitive plant species, inventoried roadless areas, and water resources.

First, the overall scale of the project is extraordinarily large and uncertain. The proposal allows for up to 600 drill sites and appears capable of effectively doubling in scope over time. This project must also be considered in combination with the nearby Polaris project, which is itself a major exploration effort. The cumulative impacts of these projects have not been adequately addressed.

A particularly troubling aspect of the proposal is that 334 future drill sites may be located anywhere within the project boundary without additional public review. This creates significant uncertainty regarding future impacts and prevents meaningful evaluation of the full extent of disturbance that may ultimately occur.

The project timeline is also unclear. There is no definite end date. It is not apparent whether activities would cease after ten years, after completion of 600 drill sites, or at some other point. The proposal notes that only two holes may be drilled at each of the initial 266 drill sites during the first seven years, yet approval is being sought for up to twenty drill holes at each of the 600 drill sites. This disconnect raises questions about the true scale and duration of future activities.

The project would result in extensive surface disturbance. Hundreds of drill pads, numerous temporary roads, and a 20-foot-wide arterial road would fragment the landscape. Roads would be constructed in Inventoried Roadless Areas, up steep canyons, and across ephemeral stream channels. Given the extent of disturbance, it is reasonable to question how effectively these areas can be reclaimed and restored to pre-project conditions.

Wildlife habitat would be lost or degraded for many years. The project would reduce habitat quality and limit access to springs and other important resources for Bi-State sage grouse, mule deer, and pronghorn. These impacts could persist long after exploration activities cease because vegetation recovery in arid environments is often slow and uncertain.

The project would also remove rare and sensitive plant species, including Long Valley milkvetch and hundreds of Bodie Hills cusickiella plants. Such losses are particularly concerning because these species have limited distributions and may be difficult or impossible to replace through reclamation efforts.

In addition, hundreds of healthy, mature pinyon pines would be removed, including many located within Inventoried Roadless Areas. These trees represent an important ecological resource that requires decades to centuries to develop and cannot be quickly restored.

The proposal would authorize numerous temporary roads within the Larkin Lake Inventoried Roadless Area, while the future placement of the 334 additional drill sites could result in substantially more road construction, particularly within the Mount Hicks Inventoried Roadless Area. This area contains important subalpine habitat that deserves heightened protection.

I am also concerned about the project's weed management strategy. Annual herbicide applications are proposed, yet the environmental consequences of repeated herbicide use over many years have not been adequately analyzed.

Similarly, the reclamation plan appears inadequate because it relies on a single seed mix across multiple habitat

types. Forest habitats, low and black sagebrush communities, riparian areas, and sagebrush steppe ecosystems each have distinct ecological characteristics and restoration requirements. A one-size-fits-all approach is unlikely to successfully restore these diverse plant communities.

Even under ideal conditions, it will likely take decades before reclaimed vegetation communities mature and regain ecological function. The environmental review should acknowledge these long-term impacts rather than assuming rapid recovery.

The proposal also relies on groundwater pumping from private land for use on public land. The impacts of prolonged groundwater extraction over seven years or more remain unknown. The environmental analysis should thoroughly evaluate potential effects on groundwater levels, springs, wetlands, and connected ecosystems.

Finally, the project documents do not clearly explain how groundwater withdrawals will be monitored and managed to ensure they remain within the limits of the applicable water right. The agency should provide specific monitoring protocols, reporting requirements, trigger thresholds, and enforcement measures to ensure that groundwater use does not exceed authorized amounts or adversely affect surrounding resources.

Given the project's unprecedented scale, uncertain duration, extensive road construction, impacts to roadless areas, wildlife habitat, sensitive plants, mature pinyon woodlands, and groundwater resources, I urge the agency to require a more thorough analysis of cumulative impacts and to fully evaluate less damaging alternatives before approving this proposal.

Thank you for considering these comments.