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March 09, 2022

Mojave Precious Metals, Inc.
Attn: Steven Swatton
1020-800 Pender Street W
Vancouver, BC V6C 2VC

Dear Mr. Swatton,

After a thorough review of the Plan of Operations modification that you submitted on behalf of Mojave Precious Metals, Inc. (MPM), the BLM has determined that it will analyze the potential impacts in accordance with the National Environmental Policy Act by preparing an Environmental Impact Statement (EIS). The EIS will analyze the following resources in detail: wildlife, vegetation, special status species, noxious weeds, cultural and Native American resources, special land use designations, recreation, water, soil, and visual resources (and potentially transportation and access). MPM’s original Plan of Operations was analyzed in an Environmental Assessment (EA) and the BLM issued its Finding of No Significant Impact (FONSI) and Decision Record in May 2018. In that decision, the BLM approved the alternative that authorized access via helicopter only and created a surface disturbance of 0.2 acres. The current proposed plan modification calls for access via overland travel and road construction and could disturb over 12 acres. Based on the resource concerns expressed by the public, Tribes, and agencies during scoping, the increased surface disturbance of the proposed plan modification, and the increase to 30 drill locations with a total of 120 hole, the BLM has determined that an EIS is warranted.

The BLM also considered the following factors when determining that it will prepare an EIS for the proposed plan modification:

1. The Joshua Tree is now a candidate species under the California Endangered Species Act.
2. The area is considered to be Lands with Wilderness Characteristics (WIU #124-1).
3. Red Ochre clay for which the Timbisha Tribe is named was unearthed during the first drilling project.
4. The largest known population of Inyo thread plant (*Nemacladus inyoensis*) in the southern Inyo Mountains was observed growing in and adjacent to the reclaimed access road. This plant species is new to science as of 2020 and is currently undergoing a California Rare Plant Rank status review (proposed status 1B.2).
5. On a field visit to engage in government-to-government consultation, Tribes told the BLM that the proposed plan modification could impact the holistic value of the area. Tribes explained that the area contains historic trails and sites where men of the tribe would gather for various reasons.


7. The proposed plan modification would cause an increase in water use, which may result in potential impacts on quantity and quality to water supplies, seeps, springs, streams or water reservoirs. There could also be indirect impacts from water withdrawal, transport, and storage on air quality, dust generation, and traffic.

If you have any questions, please contact me at (760)384-5400 or Randy Porter at (760)384-5452 and rporter@blm.gov.

Respectfully,

CARL
SYMONS

Carl Symons
Ridgecrest Field Manager