



5/14/2021

Ms. Nada Culver
BLM Deputy Director, Policy and Programs
U.S. Department of Interior, Bureau of Land Management
760 Horizon Drive
Grand Junction, CO 81506

RE: Request for Scoping and Preparation of an Environmental Impact Statement at Conglomerate Mesa, CA

Dear Deputy Director Culver,

This past March, environmental groups met with and submitted a letter to the California State and Ridgecrest Field Offices of BLM formally requesting public scoping and the preparation of a full Environmental Impact Statement (EIS) for K2 Gold/Mojave Precious Metal's second phase of gold exploration. The areas within the project at Conglomerate Mesa were designated as California Desert National Conservation Lands (CDNCL) and an Area of Critical Environmental Concern (ACEC) through the 2016 Desert Renewable Energy Conservation Plan (DRECP). The Mesa contains many important biological resources including a thriving Joshua tree population, several rare and endemic plants, a complete geological record and irreplaceable historical and archaeological resources. Impacts from new road construction and drilling activity on lands set aside for conservation, scientific study and cultural significance under the DRECP could be significant and thus deserve the highest level of environmental analysis and protection.

The company's Plan of Operations proposes 120 drill holes at 30 different locations across the Mesa. To access the sites, the company proposes 2.6 miles of new road construction and 1.1 miles of overlanding routes. The total impact is estimated to be 12.2 acres. When compared to the 2018 helicopter access-only exploratory drilling plan, which was required to remain under 0.2 acres in impact, this is an increase 61 times over the size of the previously authorized exploration impact. To achieve their work, K2 Gold and Mojave Precious Metals propose to use the following equipment:

**Table 2
Mechanized Equipment**

Equipment Type ¹	Number
Track-mounted drill	2
Tire mounted drill	4
Compressor	1
Generator	2
Pipe carrier	1
4,000-gallon water truck	2
Backhoe	1
D6 or equivalent dozer with 10-foot or less blade	1
Motor grader/blade	1
Light-duty trucks	6
Flatbed truck	2

Notes:

¹ Equipment listed may be substituted by equivalent alternative, based upon availability

An increase of this magnitude in equipment and acreage disturbance will irreparably change Conglomerate Mesa, as well as values within the ACEC, CDNCL and Wilderness Inventory units.

The first phase of this company's exploration has garnered local, regional, and national attention, including recent pieces in the [LA Times](#) and [NBC News](#). In addition, botanist Maria Jesus documented occurrences of the Inyo threadplant (*Nemacladus inyoensis*), a species new to science and ranked 1B.2 by the California Native Plant Society¹, within the proposed project area. Over the past months, tribal monitors from the Lone Pine Paiute Shoshone Tribe and the Timbisha Shoshone Tribe have visited Conglomerate Mesa and identified previously unknown archeological resources across Conglomerate Mesa. It is of the utmost importance that these new findings are incorporated into the forthcoming environmental review. The full consideration and analysis of Tribal concerns about this project is also consistent with recent direction from Secretary Haaland.

We respectfully request the BLM publish without delay a Notice of Intent to prepare an EIS, and open a formal scoping process to fully engage the public in this decision-making process. In addition, BLM must ensure public transparency throughout the process, and must engage in early, regular, meaningful, and robust consultation with Tribal Nations regarding this proposal. Thank you for your consideration and attention to this matter. Our coalition is available to discuss this project and its implications further with BLM and DOI leadership.

Sincerely,



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¹ Plants with a California Rare Plant Rank of 1B are rare throughout their range with the majority of them endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century.



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