

WESTERN MINING ACTION PROJECT

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U.S. Bureau of Land Management
EPlanning submittal
<https://eplanning.blm.gov/eplanning-ui/project/1505404/595/8001410/comment>
BLM_NM_LCDO_Comments@blm.gov

Leighandra Keeven (via email)
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Re: Foothills Dolomite Mine Draft EA Comments
DOI-BLM-NM-L000-2020-0024-EA

Dear BLM,

Pursuant to BLM's "Dear Reader" letter of May 18, 2020, the following organizations submit these comments regarding the Draft Environmental Assessment (EA) and Draft Finding of No Significant Impact (FONSI) for the Foothills Dolomite Project/Mine proposed near Deming, New Mexico by the American Magnesium LLC (AM): *Friends of the Floridas, New Mexico Wilderness Alliance (NM Wild), New Mexico Wildlife Federation, Nuestra Tierra Conservation Project, Rio Grande Valley Broadband of the Great Old Broads for Wilderness, Southwestern New Mexico Audubon Society, WildEarth Guardians, Southwest Environmental Center, Native Plant Society of New Mexico, Center for Biological Diversity, Multicultural Alliance for a Safe Environment, Amigos Bravos, New Mexico Mining Act Network, and Gila Resources Information Project*, by their undersigned counsel.

As detailed below, the Draft EA, Draft FONSI, and proposed Mining Plan of Operation (MPO) approval violate numerous federal laws, including the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), the Clean Air Act, the 1872 Mining Law, 30 U.S.C. §§ 22 et seq., the 1947 Materials Act, 30 U.S.C. §§ 601-604, and the 1955 Common Varieties Act, 30 U.S.C. § 611, and their implementing regulations. Accordingly, BLM must issue a revised Draft EA for public review and cannot approve the Project as proposed until all legal requirements are met.