



Nevada Mineral Exploration Coalition

The “Voice” of Nevada Exploration

Dec 15, 2023

Bureau of Land Management
Esmeralda Seven Solar Project

Attention: Mr. Scott Distel, Project Manager
And: Mr. Perry Wickham, Field Office Manager
<https://eplanning.blm.gov/eplanning-ui/project/2020804/510>

Re: Public Scoping on Esmeralda Seven Solar Projects

Dear Mr. Wickham and Mr. Distel:

The Nevada Mineral Exploration Coalition (NMEC, or, the Coalition) appreciates the opportunity to provide public scoping comments for the Programmatic Environmental Impact Statement (PEIS) that the Bureau of Land Management (BLM) is preparing for the proposed Esmeralda Solar Projects and associated Resource Management Plan amendments.

NMEC is a non-partisan, grassroots coalition of individuals and small businesses who make up the research and development segments of the mining industry. Our goals are to promote and preserve the natural resource exploration industry of Nevada and the western United States (the West). We use state-of-the-art science and technology to search for and develop the natural resources of the West.

We are delighted at the emergence and growth of new technologies for generating solar power and wish to support further development of solar and other green energy sources. However, it appears that this planned project will create unnecessary conflict between the location of solar panels, the development of lithium resources needed to build the battery energy storage systems to store the power generated by those solar panels, and the development of geothermal resources.

The Federal Register notice regarding the Esmeralda Solar Projects (<https://www.federalregister.gov/documents/2023/11/13/2023-24884/notice-of-intent-to-amend-the-resource-management-plan-and-prepare-an-associated-programmatic>) indicates that a Programmatic Environmental Impact Statement (PEIS) will be prepared, analyzing the effects of these proposed solar projects on: Air Resources, Biological Resources, Cultural and Native American Concerns, Hydrologic Resources, Socioeconomics and Environmental Justice, and Visual Resources. Conspicuous by its absence is any mention of the effects on Mineral Resources.

The Project Overview for Public Scoping
(https://eplanning.blm.gov/public_projects/2020804/200568720/20088930/250095112/)

[Scoping%20Project%20Overview.pdf](#)) expands on those categories but still omits mention of Mineral Resources.

It is vitally important that Mineral Resources and Geothermal Resources be included in the PEIS analysis because such resources exist in the Planning Area and because the development of those Mineral and Geothermal resources is just as important to a clean, green future as the development of solar resources.

Figure 1 (taken from the *Project Overview for Public Scoping*) shows the project planning area, with the extents of the seven solar projects within the area that has already been segregated from mineral entry.

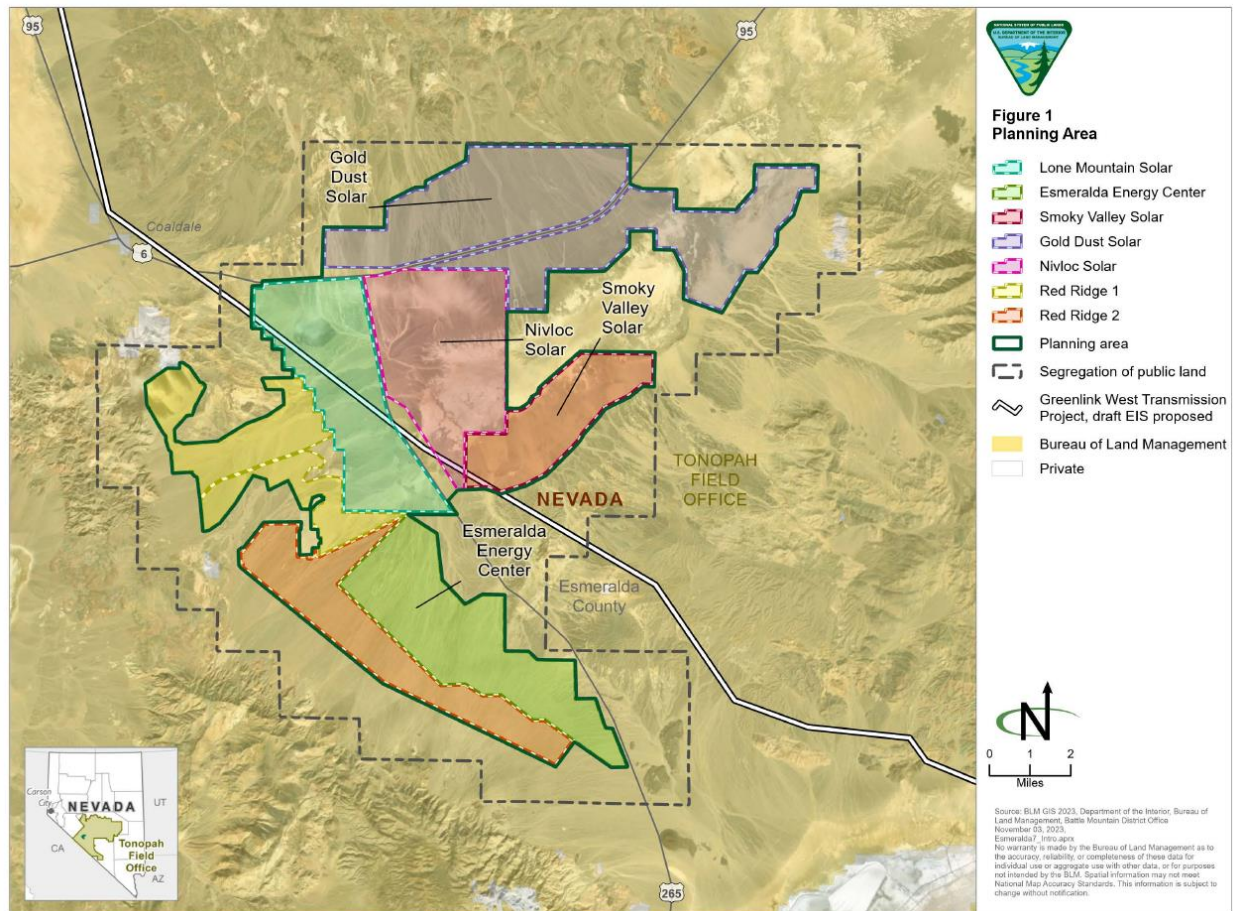
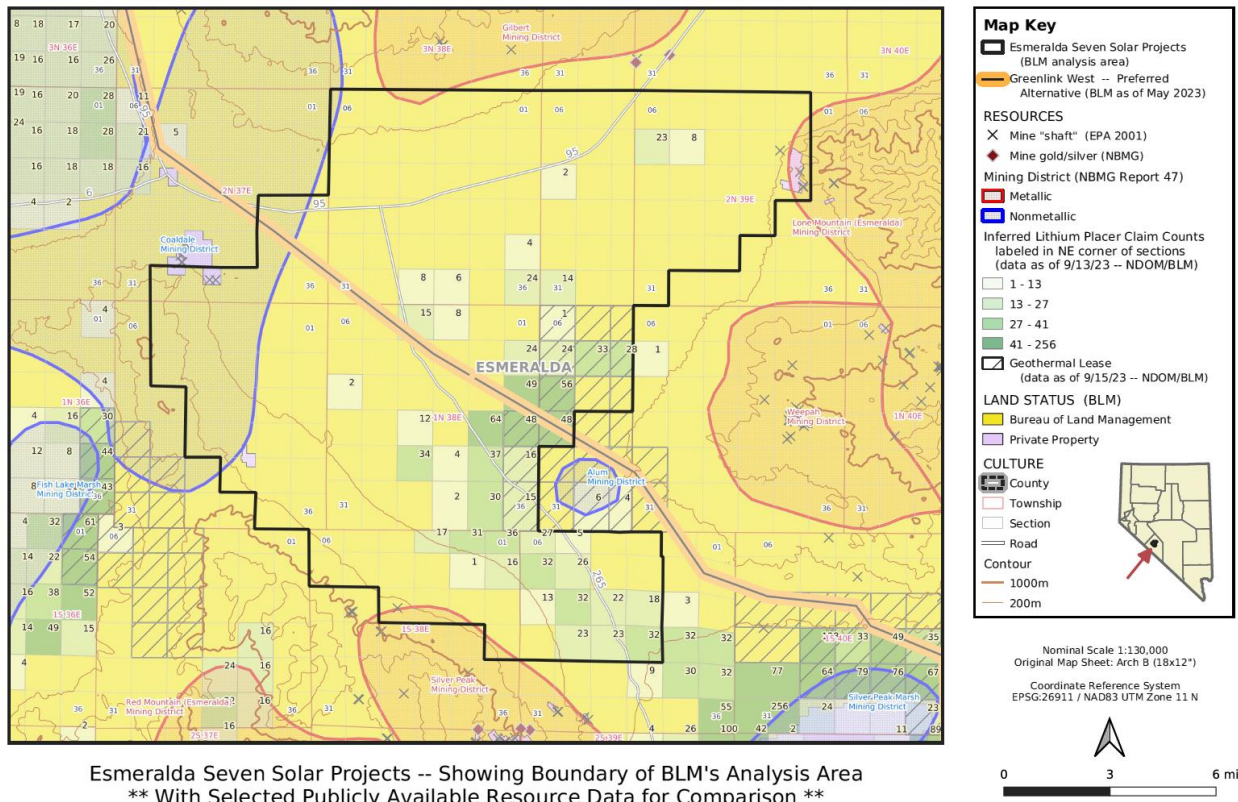


Figure 1: Planning area, to be analyzed in the Programmatic Environmental Impact Statement

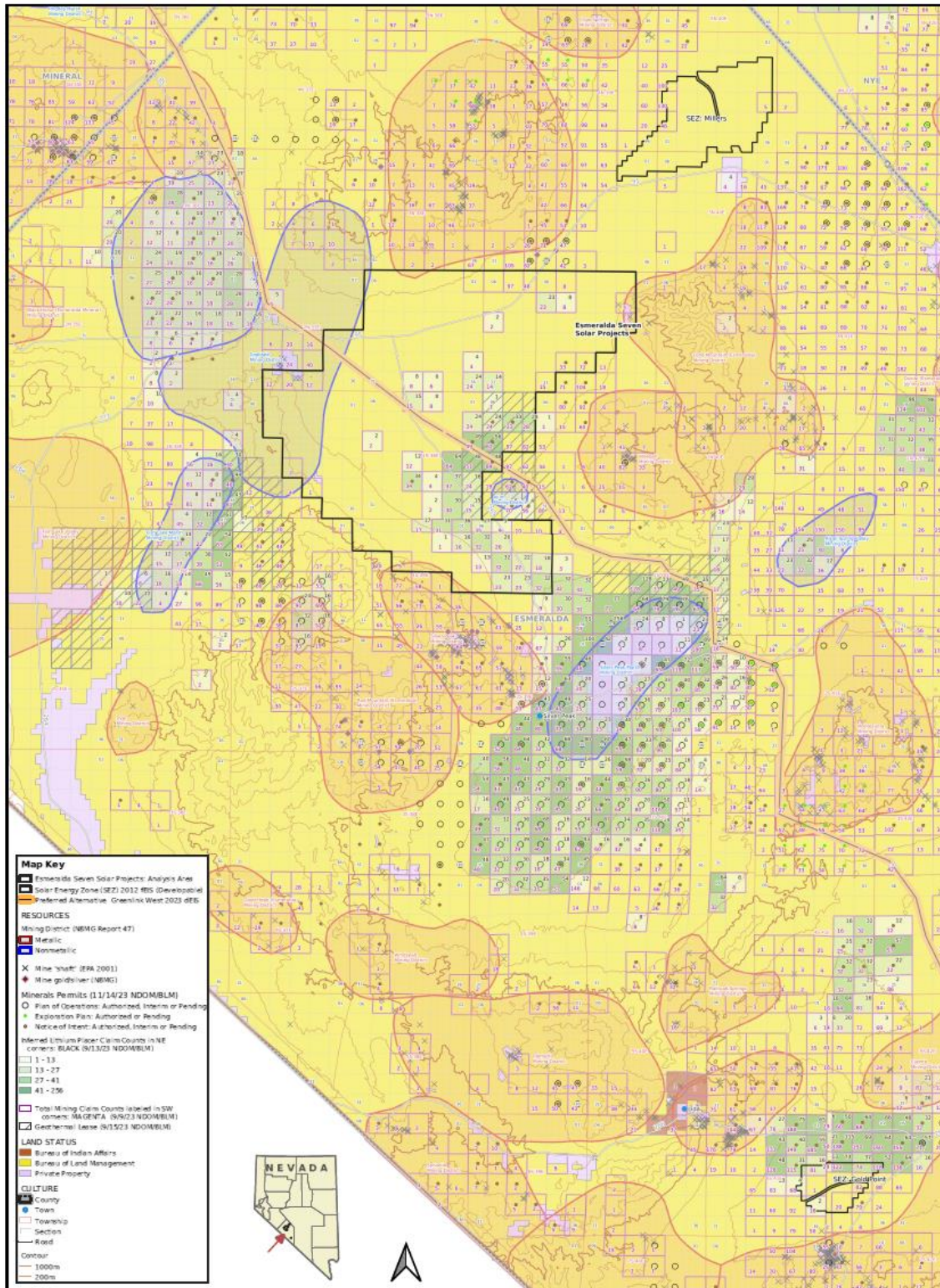
Figure 2 shows the same planning area, without the proposed solar projects but with the following pertinent other publicly available data: 1) sections which contain mineral claims that the Nevada Division of Minerals (NDOM) infer to be located for lithium; and 2) sections where there are geothermal leases. Clearly there are lithium and geothermal resources in the area already segregated from new mineral entry.



Esmeralda Seven Solar Projects -- Showing Boundary of BLM's Analysis Area
 ** With Selected Publicly Available Resource Data for Comparison **
 November 2023

Figure 2: Analysis area with selected publicly available mineral and geothermal resource data for comparison.

Over a decade ago, the BLM produced *Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States*, as part of a Resource Management Plan Amendment ([https://solareis.anl.gov/documents/docs/Solar PEIS ROD.pdf](https://solareis.anl.gov/documents/docs/Solar_PEIS_ROD.pdf)), approved in October 2012. In that PEIS, the impact on Mineral Resources was analyzed. Two areas in Esmeralda County were analyzed, the Millers and Gold Point Solar Energy Zones (SEZs). The analyses are in: *Final Programmatic Environmental Impact Statement (PEIS) for Solar Energy Development in Six Southwestern States, Volume 4, Nevada Proposed Solar Energy Zones, Chapter 11, July 2012*, ([https://solareis.anl.gov/documents/fpeis/Solar FPEIS Volume 4.pdf](https://solareis.anl.gov/documents/fpeis/Solar_FPEIS_Volume_4.pdf)). This PEIS states that solar development would have no effect on mineral resources in either Millers SEZ or Gold Point SEZ, because the mineral potential in both areas is so low.



Esmeralda Seven Solar Projects Analysis Area (2023) in Comparison with the Nearby Gold Point and Millers Solar Energy Zones [SEZ] (2012 fEIS)

Nominal Scale 1:130,000 Original Map Sheet: Arch D (24x36")

Coordinate Reference System: EPSG26911 / NAD84 UTM Zone 11 N



Figure.3: Location of two previously-examined Solar Energy Zones (SEZs) in Esmeralda County relative to Esmeralda Seven Solar Projects.

It is possible that the scope proposed for the Esmeralda 7 PEIS omits Mineral Resources as an important factor based on the 2012 Mineral Resources evaluation for the Millers and Gold Point SEZs. If so, we vigorously dispute that reasoning and the apparent omission of mineral resources as an important resource to be evaluated in the Esmeralda 7 PEIS. Each area is distinct and must be analyzed on its own merits. Moreover, as shown on Figure 3, the Miller and Gold Point SEZs are outside of the Esmeralda 7 Planning Area. It is geologically inappropriate to extrapolate the 2012 findings about the mineral potential of the Miller and Gold Point SEZs to the Esmeralda 7 Planning Area.

In addition, a new class of lithium deposits, known as lithium clay or lithium claystone deposits, has been discovered in the time since the six-state 2012 PEIS was published. These lithium clay deposits are found in exactly the same geologic setting where the Esmeralda Seven Solar Projects are being proposed. Continuing the segregation or withdrawal for another 20 years would preclude potential development of valuable lithium resources needed to make battery energy storage systems which, in partnership with photovoltaic panels, create viable 24/7 solar energy systems.

In conclusion, it is vitally important that the Esmeralda 7 PEIS study and analysis includes an examination of Mineral Resources, and a consideration of the lithium-clay potential in the Planning Area. BLM must carefully consider ways to balance solar energy and lithium exploration and development.

Respectfully,

David Shaddrick
President, Nevada Mineral Exploration Coalition

Elizabeth Zbinden
Vice-President, Nevada Mineral Exploration Coalition