

Comment #	Comment	BLM Response
	According to these documents, Ganfeng obtains an ever increasing share, in exchange for financing.	
P34	According to Lithium Americas’s Informational Circular, Ganfeng owns 15,000,000 shares of Lithium Americas, in addition to the 51% ownership of their joint venture in South America. (See Attached). Ganfeng and Bangchak, also are afforded seats on Lithium Americas board in as a result of their ownership position.	Lithium Nevada is a domestic corporation registered in the State of Nevada. This issue is outside the scope of this document and the decision to be made.
P35	Ganfeng Lithium is a massive company. There is concern China is trying to dominate the lithium markets, at the expense of US lithium battery manufacturers.	This issue is outside the scope of this document and the decision to be made.
P36	As the Executive Order of December 20, 2017 Executive Order (establishing the critical minerals policy) Notes; “This dependency of the United States on foreign sources creates a strategic vulnerability for both its economy and military to adverse foreign government action, natural disaster, and other events that can disrupt supply of these key minerals.”	Lithium Nevada is a domestic corporation registered in the State of Nevada. This issue is outside the scope of this document and the decision to be made.
P37	This mine is clearly contrary to the Critical Minerals Policy. BLM should thoroughly consider the impact of this mine on US business, and US citizens such as ourselves, rather than rushing approval to the detriment of US interests.	Lithium Nevada is a domestic corporation registered in the State of Nevada. This issue is outside the scope of this document and the decision to be made.
P38	This mine is will be utilizing a new process to extract lithium out of clay that does not appear to have ever been used before on a commercial scale. Given this is an experimental process BLM has an obligation to extensively analyze impacts.	All of the technology being utilized have established industrial histories. Putting them together to accomplish extraction of lithium from a clay-based ore is the groundbreaking aspect.
P39	Specifically this process will use enormous amount of imported sulfur. According to the Plan of operations, this mine will generate a maximum daily production of 5800 tons of sulfuric acid, in phase 2. The weight of sulfur within sulfuric acid is 32.693% of the total weight. Therefore generating 5800 tons of sulfuric acid would require burning 1896 tons of sulfur a day. Semis can haul about 50,000 pounds (25 ton). Therefore in order to generate this quantity of sulfuric acid will be importing 75 semi loads of sulfur a day, and burning it in a massive incinerator.	The sulfuric acid plant planned for Phase 1 would be capable of producing approximately 2,900 tons per day of sulfuric acid. The Phase 2 sulfuric acid plant would be sized to double LCE production and would be capable of producing an additional 2,900 tons per day of sulfuric acid. EIS Table 4.17. Chemicals and Reagents (Hazardous Materials) on Site indicates a maximum consumption of sulfur for Phase I of 340,247 tons per year for Phase I. Maximum consumption of sulfur for Phase II would be twice that of Phase I, 680,494 tons per year. LNC would be permitted to use this amount of sulfur annually for Phase II as indicated in the Mine Plan of Operations, hazardous waste storage permits, and other permits issued by regulatory agencies for the facility. Transport of sulfur to the Project site under Phase II would involve approximately 75 sulfur trucks per day. Text of the EIS has been edited for clarification.
P40	Burning this quantity of Sulfur and dumping the ultimate residue, from Sulfuric Acid, on public lands is going to have very substantial impacts. This is in addition to the impacts to groundwater and surface water, from the pit, test holes and production well.	The Thacker Pass facility Clay Tailings Filter Stack is designed to store the mechanically placed filtered tailings solids (filter cakes and sulfate salts) generated during lithium production. The CTFS is being designed as a zero-discharge facility as defined under Nevada regulation NAC 445A.385. “Zero discharge” means the standard of performance for the protection of surface waters which requires the containment of all process fluids. Drainage from the CTFS would not discharge to groundwater or surface water. The CTFS would