Roca Honda Resources Response to Agency 03-01-2013 Comments of Roca Honda Project Baseline Data Report, Revision 1 Responses, (Oct 10, 2012) MK025RN

May 15, 2013

Agency Review of Roca Honda Uranium Baseline Data Report, Revision 1			
Reviewer: David L. Clark **Agency:** NM MMD			**Review Date: March** 1, 2013
Item #	**Section/Page (or general)**	**Topic**	**Comment**
1.	Response to previous comments	Characterization of excavation material	Awaiting characterization and description of the potential for geochemical alteration of the material retrieved from the core drilling of the Section 16 shaft site.
	RHR Response		**RHR contracted with Key Agricultural Services, Inc. to perform a geochemical evaluation of geological material from a core hole drilled at the location of the Section 16 production shaft. The report will be attached as Attachment 3 to the MOP. We have revised MOP text on pages 64, 70, and 83 to reflect the results of the geochemical evaluation.**
2.	Response to previous comments	Baseline condition of San Lucas Arroyo at pipeline discharge point	Awaiting characterization of the baseline condition of the arroyo(s) at the end of the reuse pipeline, as stated in the MMD letter of October 4, 2012 (addressing the Reclamation Plan).
	RHR Response		**The San Lucas Arroyo has been surveyed from the pipeline entrance to a point 750 feet downstream and six drawings that show the longitudinal section, 17 cross-sections, a plan view and the discharge point protection structure details. The survey data of the arroyo will be attached to the Baseline Data Report as Appendix 8-E and the erosion protection structure drawings will also be included in the Mine Operations Plan as Figures 5-2 and 5-3. We have revised MOP pages 70, 85, and 86 to reflect to San Lucas Arroyo survey and design.**

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3.	Response to previous comments	Ephemeral drainage water sampling	Awaiting a response to our inquiry regarding the monitoring of upslope ephemeral drainages in the MMD letter of February 28, 2013 (addressing the Mine Operations Plan).
	RHR Response		**RHR has made attempts to collect water samples from the ephemeral upslope arroyos. We have also tried collection bottles in the bottoms of the arroyos but they have proven to be unsuccessful, such is the nature of surface water. RHR expects that there will be ample opportunity between approval of the permit and commencement of operations to sample when staff is available onsite on a regular basis to physically grab water from active flow during rain events.**

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Reviewer: Kenneth Cunningham **Agency:** NMDGF	**Review Date:** January 7, 2012

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4.	Response to previous comments	Wildlife endangered, threatened, sensitive species	Table 17, Appendix 5-C has been updated. However, Table 5-1, on page 5-5, shows correct information on least tern, but does not include the bat *Corynorhinus townsendii pallescens*. We recommend these tables be reviewed again for accuracy and consistency. If there is a reason these tables should differ from each other, please state the reason in the BDR Section 5 text.
	RHR Response		**Table 5-1 on pages 5-5 and 5-6 of Section 5 of the BDR Revision 1 has been updated to include the Townsend's big-eared bat. The table has been marked as a replacement pages with May 2013.**
5.	Response to previous comments	Raptor disturbance	The Department appreciates RHR's commitment to conduct further consultation on raptor disturbance issues. Recommended construction activity avoidance distances for the species whose nests were detected on the permit area are 0.25 miles for Great Horned Owl and 0.5 miles for Red-tailed Hawk. The approximate nesting seasons for Great Horned Owl and Red-tailed Hawk in the Mt. Taylor area are January 1 to July 1 and April 1 to August 1, respectively. Nest activity surveys should be repeated immediately prior to construction if construction will be initiated during the breeding season.
	RHR Response		**RHR will consider the nest activity surveys at permit approval.**
6.	Response to previous comments	Acoustic bat monitoring	The proposal of post-construction acoustic bat monitoring does not address the need to document wildlife resources existing on the site. Our recommendation is for baseline, pre-construction acoustic monitoring as a part of site characterization of biological resources. The state Threatened spotted bat has suitable habitat in the permit area, and has been recorded from the Mt. Taylor area. There is also suitable habitat for several sensitive bat species, including the pale Townsend's big-=eared bat, a federal Fish and Wildlife Service Species of Concern. The spotted bat is easily distinguished from other species by acoustic monitoring methods.
	RHR Response		**RHR will conduct the acoustic monitoring system to collect data during the bat migration periods between April and October and report the results prior to the mine construction period.**

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Reviewer: Kevin Myers **Agency:** NMOSE			**Review Date:** January 4, 2013
Item #	**Section/Page**	**Topic**	**Comment**
7.	Response to previous comments	Units conversion	Section 9.4.6, Dakota Sandstone. As indicated in previous comments, this section has an error in the conversion from cfs to gpm. This section reports a median value of 0.3 cfs as being equivalent to 12 gpm. Perhaps the authors intended this median value to be 0.03 cfs, which is equivalent to 13 gpm.
	RHR Response		**This error has been corrected to the 0.03 cfs and 13 gpm and a replacement page 9-36 is attached with this response package.**