

May 11, 2016

KNPB Board of Trustees  
1670 N. Virginia St.  
Reno NV 89503

CC: Community Advisory Board  
Mr. Kurt Mische, President & CEO  
Mr. Tony Manfredi, Senior Vice President for Content and Marketing

Dear KNPB Board of Trustees,

We write to communicate our dismay at KNPB's decision to produce and air a biased four-part Nevada Mining Series. We support KNPB's mission to connect our community, educate and share ideas and are disappointed that KNPB is standing behind this series as a fair and accurate portrayal of the industry. The attached document outlines specific examples of the one-sided, misleading and even untrue information presented in the program.

One of the most valuable tenants of public broadcasting is to provide coverage of local issues as well as contrasting viewpoints, particularly when those issues and viewpoints are not being discussed in mainstream media. Unfortunately KNPB's 4-part mining series did not uphold these values as only about 8 minutes out of a 120 minute series featured opinions critical of the mining industry status quo. Under no circumstances can this be considered a balanced portrayal of the issue.

Entire subject areas fundamental to the discussion of the history of mining and its impacts on our state today were completely omitted:

- Impact of historic mining on Nevada's Native population
- Effects of current mining on cultural areas, in particular Shoshone, Paiute, and Washoe cultures
- Permanent loss of water due to mining
- Segmentation of roadless areas from mining exploration and production
- Widespread and well-documented accusations of human rights and environmental abuses committed by Nevada-based companies operating abroad
- Economic instability of mining in Nevada – boom and bust and related sudden changes in mining operations
- Significant legal cases brought against Nevada mining companies

Content areas with incomplete or inaccurate coverage:

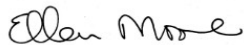
- Pit Lakes and water use
- Water contamination, especially areas where treatment in perpetuity is possible
- Mercury releases, in particular, fugitive emissions and mercury in tailings and heap leach facilities
- Mt. Hope proposed moly mine – no interviews with Eureka county, ranchers in the area and no mention of the two prominent legal cases surrounding this mine
- Energy use by the industry and greenhouse gas production
- Anaconda mine – no interviews with the directly affected residents
- Mining in the Comstock – no mention of the Carson River Superfund Site and no interviews of how the residents are being affected

The level of journalism of this series is not in par with the standard that Public Broadcasting professes or the quality that we have come to expect from KNPB. More importantly, it did not advance KNPB's core mission of connecting and educating our community, rather it used primetime program space to advance the agenda of the Nevada Mining Association.

We urge KNPB to take steps to rectify this problem by airing a program that features equal time for voices of people not associated with or directly employed by the industry. There are many documentaries to choose from and we are more than happy to provide support in order to find something appropriate for the KNPB audience. Finally, we ask that you examine the instances of inaccurate reporting and reach out to experts in the field that are not associated with the mining industry to correct these mistakes, or at the very least communicate to your viewers that there is more than one expert opinion to consider.

We appreciate your time and consideration and are happy to work with KNPB staff, trustees or community advisors to promote real dialogue and education around this issue moving forward. We look forward to your response.

Sincerely,



Ellen Moore  
Mining Justice Organizer  
Progressive Leadership Alliance of Nevada  
775-348-7557  
[emoore@planevada.org](mailto:emoore@planevada.org)



Joe McCarthy  
Secretary Treasurer  
Comstock Residents Association  
775-720-0331  
[1200paydirt@gmail.com](mailto:1200paydirt@gmail.com)



John Hadder, Director  
Great Basin Resource Watch  
[john@gbrw.org](mailto:john@gbrw.org) - (775) 348-1986

## ATTACHMENT: Specific examples of inaccurate, omitted, incomplete, and misleading information

The tone of the series is set by the first program, which tells the story of John Mackay. While Mackay and the early mining period is undoubtedly a significant part of our mining history, it is by no means a complete or even partially complete version. This tone persists throughout the series, as does the message of our dependence upon mining and how the materials mined benefit our world. We do not disagree that much of our modern world is built upon materials mined from the earth. However, the series does not account for the cost to communities and the environment that comes with this extraction. Any mention of negative impacts is typically followed by a longer discussion of how those impacts are effectively addressed along with an additional commentary on the necessity of mining.

We want to highlight one particular omission in more detail: the destruction of the Western Shoshone cultural area at Mt. Tenabo by the Cortez Hills Mine in Crescent Valley Nevada. Mt. Tenabo, is one of the most significant cultural sites for Western Shoshone people of Nevada. There are numerous creation stories that involve Mt. Tenabo and it has been the location of annual gatherings, sweat lodges, and spiritual seeking activities.

The legal battle that resulted from Barrick's interest in mining in this cultural area gained global attention (290 comments were logged on the EIS). Great Basin Resource Watch (GBRW) was a plaintiff in this case and director John Hadder spoke at some length to Golden Productions about the legal case and the significance of the site. He also gave Golden Productions Western Shoshone contacts to follow up on this issues but there was no footage of Western Shoshone (or Paiute or Washoe) expressing their concerns regarding mining on their traditional lands. Mining's incompatibility with other community, spiritual or cultural uses is one of the foremost controversies and obstacles to mining, and it is completely lost from the series.

The coverage of the proposed Mt. Hope mine is another blatant example of incomplete coverage. There was no mention of the water use issue of Eureka Moly LLC and how existing water rights would be impacted. The series shows an interview with Pat Rogers of General Moly, who states that the company worked with the community, but fails to acknowledge that the County and ranchers brought suit against the company and state of Nevada Water Engineer over impacts to existing water rights due to the proposed mine. Furthermore the Nevada Supreme Court agreed with Eureka County and the ranchers, hence vacating the temporary water rights of the mine.

There is no mention of GBRW's legal case, now in the Ninth Circuit Court of Appeals, that John also discussed in some detail, including the fact that one of the oldest ranching families in Diamond Valley is a declarant in the case. The average viewer is left with the notion that while there are some environmental concerns the company has worked with the community and addressed those concerns. This is far from reality.

In general, the series leaves the viewer with the impression that those "problems" that have arisen from mining have been dealt with, so no outstanding problems from mining in Nevada. This is false.

### **Episode 1 "From Pickaxe to GPS"**

**8:25** – Clara Trippel – Environmental Coordinator Phoenix Mine – Newmont “ ... all of the rules and regulations we follow ... so that the environment is not impacted...” The environment will be impacted, the

question is to what extent and whether the effects of mining can be mitigated or remediated. This statement is not challenged directly.

**19:00** – There is a detailed presentation of the sophisticated monitoring that is done of the operations for safety and efficiency. However, there is no similar dedication to environmental monitoring. The mines continue to resist ambient air monitoring for fugitive mercury emissions.

**21:30** – Presentation of all the materials mined that society depends upon presenting the case for the industry.

## **Episode 2 “Our Wealth of Minerals”**

Opens with “If it can’t be grown it must be mined” This is a common quote used by pro-mining activists. No similar quote is presented from anti-mining activists. There needed to be a critique of this statement to at least say that just because the mines produce something society uses does not mean it should be able to do whatever it wants.

**3:20** - Another discussion of our need for mined minerals. In particular the practical uses of gold are highlighted, but not how much more is used for nonessential desires. Much later in the series there is a clip of John Hadder giving the percent break down of where the gold ends up. However, it should have been done in this segment.

**4:10** – Discusses reclamation showing a site with flowers and grass. This is not a representative reclamation image and is misleading. They do move to the Anaconda site showing “scars from the past” but the impression is that this does not happen anymore.

**4:20** – From the Anaconda site the series moves to the Pumpkin Hollow proposed mine. Interviews of Mayor Dini and Lyon County Manager Jeff Page both provide a glowing endorsement of the Pumpkin Hollow mine stating, “it’s a win win situation” leading one to believe that the community is not concerned about mining. There is no mention of how this mine lobbied to avoid having to do an environmental impact statement normally required for a large mine on public land. There is no interview with those residents directly affected by the Anaconda mine, people who have been drinking bottled water for years.

**7:00** – No counterpoint presented to the statement - “mining is a heavily regulated industry”

**8:00** – Jeff White (Newmont) talks about how permits cover all aspects of operations. Shown are images of areas near mining operations.

**8:25** – Clip of John Hadder (15 sec) on the need for nonprofit oversight. The editing makes the viewer think that all nonprofits work together with the mining companies in a copasetic manner.

**10:10** – Allen Biaggi is identified as the former Director of the Nevada Division of Environmental Protection. He has actually been employed by the Nevada Mining Association since retirement.

**11:20** – Donovan Gross, Environmental Specialist for Newmont on pit lakes – “... most of the water is drawn from deep aquifer (bedrock) not alluvial aquifer... alluvial aquifer feeds river ..” This is a half truth

since there is a connection between bedrock and alluvial aquifers. Newmont staff leaves the viewer with the impression that dewatering does not affect river flow or groundwater users, which is wrong.

**11:58** – Back to Biaggi – “...Stringent requirements by NDEP to re-inject pumped water into aquifer or if that is not possible substitute for beneficial use.” This statement is also misleading. The mines almost never do reinjection not because it can’t be done, but because the industry wants to dispose of the water in the least expensive way. GBRW has always advocated re-injection so as to return the same water to its origin.

**12:43** – Michael Brown, President Barrick – “Most of what we pump ends right back into the ground.” But not from whence it came. Infiltration does not return the water to the deep aquifer, and it is possible that the infiltration operation could dissolve surface salts and carry those into the deeper aquifer over time, hence contaminating the aquifer. Springs and seeps dry up in the meantime, and there is no mention of this in the program.

**12:45** – Jeff White, Director, Environmental Stewardship, Newmont – Discusses Maggie Creek Restoration Project, and the program shown scenic images of Maggie Creek. Jeff mentions the potential to affect springs, but does not say that some have already been affected. There was a documented case of 3 springs drying up due to mine dewatering in the fourth quarter 2005 monitoring report by Barrick for the Betze/Post mine.

**14:24** – Narrator – “... maintenance of the water quality is required as a closure responsibility...” This statement is misleading and a half-truth, since there are no water quality standards for pit lakes. The only maintenance that mining companies do is treatment of acid drainage to the extent that:

“(a) Has the potential to degrade the groundwaters of the State; or

(b) Has the potential to affect adversely the health of human, terrestrial or avian life.”

**(NAC 445A.429)**

This is not maintenance as the public would understand it.

**14:37** - Donovan Gross, Environmental Specialist, Newmont “In this particular pit lake (Lone Tree) we have a very seasonal and what we consider to be temporary low pH in the surface water...” This statement borders on a boldface lie, since there have been consistent acidic conditions since 2007. Without significant treatment (~ 70,000 tons of lime, and 1,900 tons of caustic soda to date) the Lone Tree pit lake would be very acidic and violate federal law – Migratory Bird Act. This section does not capture the magnitude of the problem and does not suggest the potential for treatment in perpetuity. All of this was told to Golden Productions in the interview with John Hadder, but did not appear in the program.

Gross also states that the sulfide generates a “weak acid.” This is wrong; the primary acid created is sulfuric acid which is chemically a strong acid. Again, the Newmont employee is minimizing the impact of acid drainage. In reality, acid drainage is a serious problem and Newmont has a potential treatment in perpetuity problem at the Rain mine (no mention of this site), and at the Phoenix mine.

**14:50** – There is mention of the Helms pit, but the program does not distinguish for the public the difference in the chemistry of a gravel pit versus a hard rock mine pit. While we do advocate for recreational post-mining use of hard rock pit lakes, this can only occur once the water is stabilized. This stabilization can take a very long time – decades or longer, but there is no requirement for the

mine to design the pit with reclamation in mind. This is not required in the regulations. Again, John Hadder discussed the need for initial engineering design for post mining use, but did it not appear in the program.

**19:48** - Pat Rogers, Vice President Permitting and Environmental Compliance, General Moly – “...some concerns with impacts...permitting has been long ... we involved the county and individual stakeholders in the process...” Again, this minimizes the controversy at this site with two legal cases against the mine. The program does not interview county spokespeople or ranchers on the water issue, and there is no mention of the litigation.

**21:34** – Michael Brown, President Barrick states “ We have a reputation to protect and do everything we can in that area (environmental protection).” This does not include protection of cultural sites. This reputation does not carry overseas, and is debatable here in Nevada.

### **Episode 3 “Modern Prospecting”**

**10:47** – Discussion of the TS power plant and energy use. The program does not evaluate the production of greenhouse gasses by mining in Nevada. Overall, mining in Nevada appears to contribute about 10% to the Nevada GHG emission. The program minimizes the negative impacts of coal burning as well, by stating that low sulfur coal is used. John Seelger, Regional energy Manager, TS Power Plant - “one of the best plants in the country in terms of emissions, fourth lowest SO<sub>2</sub> emissions and 6th lowest NO<sub>x</sub> emissions in country for coal fired.” This is also a half truth, since the power plant is a 203 MW facility which is quite small. On average coal power plants are well over this, and typically range 500 to 2,000 MW, so in terms of gross emission it should be lower. A better statement would be the emission per kilowatt.

**12:20** – The discussion of mercury emissions is okay, but there is no mention of the fugitive emission issue, which John Hadder did discuss with Golden Productions. Fugitive emissions are not trivial and EIS statements do now include this in the analysis due to public concern.

**13:00** – Clara Trippel, Environmental Coordinator Phoenix Mine, Newmont - “.. there are a couple of areas where we have a very minute amount of mercury vapor in its actual gaseous form...” Again, this is a misrepresentation of the issue. Indeed Phoenix does not have a lot of mercury to deal with, but the producers just needed to look at another Newmont operation Twin Creeks, which in 2014 emitted about 68 pounds of mercury into the atmosphere and captured about 20,000 pounds as a co-product (liquid mercury). This is not a minute amount. The program is misleading in that the viewer would think that while there was a problem of sorts there really is not that much mercury to have to handle in general.

**16:20** – Jeff White discusses drain down fluids as part of closure. There is no mention of the serious drain down issue at the Anaconda mine site at this point or that Newmont is planning to treat in perpetuity (at least 500 years) fluids at the Phoenix site.

**18:10** – There is a discussion of reclamation of slopes and the program shows positive reclamation images with grasses blowing in the foreground, but does not show sites where there is still acid drainage and poor water quality seepage from the base of a waste rock facility, heap leach, or tailings facility.

**19:30** – Discussion of Sage Grouse - Interviews with Jeff White and Michael Brown allow the industry to talk about their projects to create sage grouse habitat. However, it remain unproven whether these efforts will result in sage grouse repopulation in the near to intermediate future. In the meantime the mining operations obliterate sage grouse habitat, and the various exploration activities further segregate and divide sage grouse populations.

The Carlin Trend mines that form a band of open pit and underground mines running northwest from the town of Carlin Nevada has destroyed sage-grouse habitat. Prior to mining activities this area was most likely prime habitat. Recent EIS analyses of mine expansions in the Carlin trend affirm the potential for sage-grouse habitat. The Betze pit expansion EIS<sup>1</sup> states, “Historically, three leks occurred immediately within the project vicinity (Lamp 2007b). However, two of these leks have been consumed by the BGMI Goldstrike Mine in recent years. The third lek is 1.5 miles north of the study area and has not been active since 1989 (BLM 2007b). The nearest active lek occurs approximately 5.5 miles north of the study area and is considered in the cumulative effects analyses.” (p 3.8-11) Thus, the region would seem to have once contained a significant sage-grouse population. The EIS goes on to state, “Greater sage-grouse have been observed within the project area and suitable habitat is present. However, surveys conducted in March 2008 found little sign and indicated the project area as low density habitat (SRK 2008b).” (p. 3.8-11). This indicates that while there maybe habitat for sage-grouse, the bird has been largely if not entirely driven out by mining activities.

The program gives the impression to the viewer that the mining companies are doing more to protect sage grouse than they are negatively affecting these populations, and in fact are part of the long-term solution to sage grouse decline. Michael Brown (21:04) discusses how the federal government does not have the budget to restore sage grouse habitat but Barrick does. Hurray! Barrick to the rescue. There is no counterpoint presented to this advertisement by Barrick.

**21:40** – Al Kaczanowski, Vice President of marketing EP Minerals – discusses how his company would be affected by proposed federal regulations. The program appears to be referring to the Dept. of Interior Minerals Withdrawal proposal, but does not interview the Interior Dept. representative to explain the proposal and why it has arisen. Rather the program relies on analysis from the industry, whose scope is focused on profits. He states that the classification of sage grouse priority areas is “false” since “... there has not been sage grouse in the area... for a long long time...” (referring to Clark County). This could be due to mining operations obliterating the habitat but the heart of sage grouse country is not Clark County. The producers’ choice to focus on an interview by a company in southern Nevada appears also to be a dodge of the issue. The area for withdrawal is in northern Nevada and the primary areas of concern are northern and central Nevada.

Overall the sage grouse issue is poorly addressed, and appears in a very unbalanced way.

**22:19** – The program discusses the mule deer issue and Larry Johnson, Nevada Wildlife Coalition, lays out the complications in terms of land disturbance, but discussion of impacts to seeps and springs, which are part of those migration routes, is not mentioned.

**23:00** - Cut back to Jeff White talking about what Newmont is doing. However, the main mule deer issue is with Bald Mountain mine, not a Newmont operation. Jeff White talks about creating a

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<sup>1</sup> US BLM, *Draft Supplemental Environmental Impact Statement Betze Pit Expansion Project*, August 2008.

corridor between mine facilities so the deer can migrate effectively, but it remains controversial whether the corridor is sufficient. He is probably referring to the Long Canyon mine, which is not the center of concern.

**23:41** – Back to Larry Johnson discussing how concerned they were about the Bald Mountain, and that Barrick was initially not responsive. However, he does state that eventually there occurred “a turning point.” The program does present this as a happy ending, but its not over. Furthermore, Barrick sold its controlling interest in the Bald Mountain mine, and earlier agreements regarding mule deer and sage grouse are in question. This section closes with the final word from Michael Brown, again allowing the industry to get the first and last word.

#### **Episode 4 “Dollars, Sense and the Bottom Line”**

**8:50** – The program discusses the ballot question of the net proceeds tax. Interviews Jeremy Aguero Principal Analyst provides background on the net proceeds tax.

**9:50** - Narrations states “Rural Nevada would have had the most to lose if the net proceeds ballot measure had passed.” This is an incorrect conclusion drawn by the program. No counterpoint is allowed. The ballot measure was to move the net proceeds out of the constitution and allow the legislature to determine taxation. It is premature and quite unlikely that the legislature would then have eliminated a county portion of tax revenues from mining. Indeed the rural counties would have lobbied hard for this and few would oppose this, except maybe the mining industry on the quiet.

**10:15** Back to Jeremy Aguero, “the industry pays every other tax that other businesses pay plus the net proceeds...” This gives the viewer with the impression that mining is taxed more and indeed is paying more than its fair share. The NPM tax is the industry friendly substitute for how mining land is valued for property tax purposes. Wouldn't Las Vegas property owners along the Strip love to have the county assessor deduct development-related expenses when calculating the market value of the land under their casinos? Or any property owner in Nevada for that matter?

There is a clip from Bob Fulkerson, which addresses some counterpoint. However, the net proceeds tax continues to be cast as a property tax and the program does not discuss the salient difference in mineral extraction – loss of resource from a state and county forever. Thus, there does need to be special consideration in terms of loss of value to the state and county. There is also no mention of how oil and gas must pay the federal government a royalty on extracted fluid minerals and that hard rock mining does not pay this to the federal government.

**12:18** – Michael Brown – “...as an employer, I think we pay the higher per employee taxes in the state...” This is also a half truth and misleading. The calculation here is total taxes divided by the number of employees. The mining sector accounts for a very small slice (~1% statewide employment according to Jeremy Aguero) of employment in Nevada, which would make for a larger rate per employee.

**13:24** - Jeremy Aguero “... as an analysis, people seem to want to view the mining industry and mining tax as some kind of panacea...” This is not GBRW or PLAN's perspective and the program again misrepresents the non-industry perspective.



**14:25** – The program highlighted the initial investment that the industry requires in order to get a return later. This casts the industry in a sympathetic light and gives the impression that all this “additional” tax is unfairly burdensome. GBRW’s position is that this investment is the cost of doing business and that the removal of a resource permanently with associated impacts to the environment and community requires just compensation.

**14:54** – Mike Pack President and Chief Operating Officer of Cashman Equipment discusses uncertainty in taxes which affects his and other supporting operations. There is no mention of the inherent uncertainty of mining operations and how that affects tax revenues. Indeed if the production company had done its research they would have learned that Eureka County had serious concerns about the Mt. Hope mine from a financial stability point of view. In fact, General Moly laid off employees due to lack of financial backing, so the mine started operations but is now on hold indefinitely. The program once again did not research the issue thoroughly enough to give the viewer a full picture of the situation.

**15:12** – Pam Borda, Executive Director Northern Nevada Regional Development Authority, “.. the impact if mining were to go away...” This argument needs a counterpoint. Bob Fulkerson does state earlier that mining is not going to pick up and leave, but that piece should have been included at this point. It is not reasonable to assume that increased taxation would cause the mining industry to leave northeastern Nevada or other places in Nevada. Whether the mining industry “stays or leaves” is not dependent upon taxation but upon the vagrancies inherent in the industry such as the situation with Mt. Hope and General Moly.

**19:08** – The program mentions that Comstock Mining Inc., (CMI) is “*just* doing exploration drilling.” This is presented as a minor impact on the residents. Joe McCarthy of the Comstock Residents Association (CRA) provided Golden Productions with the following specifics, all of which were left out in favor of the company’s public relations talking points.

- No mention of industrial noise, haul truck traffic through town, toxic dust, loss of animal habitat, destruction of the viewshed and reduced property values. No mention that the area CMI is mining and exploring is a Superfund Site, and the implications of that. Mining in a Superfund site means unsafe, unhealthy exposure to lead, arsenic, and mercury. CMI was aware of this but did not disclose this until confronted by the residents. The citizens requested that CMI fund an independent, third-party analysis to ensure all test results were interpreted correctly, handled appropriately and communicated in an unbiased manner to affected residents. CMI flatly refused.
- No mention of CMI’s convoluted - almost comical - attempts to avoid action on public land, thus avoiding the need for an EIS.
- No mention of CRA’s two active lawsuits regarding mining in the Comstock.. One lawsuit is currently in the Nevada Supreme Court. It relates to the Lyon County Commissioners abuse of discretion by ignoring a half century of community based master planning and long-term land use objectives, and a petition signed by 80 percent of the adults living in Silver City who opposed the CMI master plan amendment and zoning change application. The amendment and zoning change would allow mining as a special

use within the town's borders. The town's advisory board unanimously recommended denial, the Planning Director recommended denial, the Planning Commission recommended denial. And yet, the CMI purchased enough influence with the commissioners to ensure that the recommendations urging sound comprehensive master planning were ignored and the mining company's application was granted.

- No mention of CRA's recent action in district court related to the Nevada Public Records statutes. CRA believes that serial discussions took place outside the public process between commissioners, the mining company and its surrogates.
- No mention of the collapsing of State Route 342 possibly caused by expanding the 110 foot deep open pit to within 10 feet of the state highway.
- No mention of the successful court action brought by CRA to ensure haul trucks were prevented from using the highway. These large trucks competed with emergency vehicles, school buses, tourists, and commuters. At least two retail business on 342 shut down because of the unsafe highway.
- No mention of the carefully engineered explosions occurring every day and into the evening for years on end.
- No mention of any attempt to mitigate the effect on the toxic rubble strewn all over the land, other than to pay service to flimsy reclamation promises. The emergence of Russian Thistle on the hillsides in the 'reclaimed' areas seems to be the extent of this lofty promise of "rolling reclamation," yielding an abundance of tumbleweeds and future fire hazards. Once CMI departs, it will be taxpayer funded reclamation, a hidden subsidy that rarely gets mentioned.
- No mention to the ongoing threat by CMI officials to deploy, if they don't get their way, the discredited legal assumption that patented mining claims give miners carte blanche permission to mine.
- No mention of the 30 plus straight quarterly negative net income, notwithstanding an occasional accounting maneuver to hide the loss.
- No mention that CMI has never defined a proven and probable mineral reserve as required by the SEC, other than "inferred resources," an undefined, nonstandard terminology meant to imply a bonanza where none exists.

The program missed the opportunity provided by CRA to convey how industrial scale exploration and open pit mining adjacent to the culturally rich residential communities of Gold Hill and Silver City has adversely affected the residents' basic community rights. It in no way clearly and completely represented the issues in play though it was provided ample opportunity to do so.

**21:06** – The program then goes on to talk about how CMI is working hard to restore historic aspects of the Comstock through an interview with Pamela Abercrombe, Executive Director, Comstock Foundation for History and Culture. It is a bit unclear in the program, but a conflict of interest sits

just below the surface. The Foundation for History and Culture was organized and is funded by CMI, including a promise of future common shares held by its principal investor, Mr. John V. Winfield, a real estate investor from Los Angeles.

Indeed, according to Pamela, this idea of preservation was floated by CMI around 2010, which is also when it would have become clear that there would be significant local opposition. The opposition made it clear that the area is a National Historic Landmark and has significant economic and social contributions to all of northern Nevada. She states that "... [CMI] not only wanted to come to this area not only to mine the ore but also to invest in the preservation and restoration of the historic structures and mining site..." This statement also requires a counterpoint. It is hard to believe that CMI had any other interest than to make money from mining or the gullible equity markets.

- No mention of how CMI is actually buying influence with some inexpensive repair of a headframe here and there. All the while, this "foundation," purportedly created to support historic preservation turns a blind eye to the total obliteration of the Landmark's cultural landscape, its landforms and its historic artifacts.
- The Foundation for History and Culture is also silent as CMI works behind the scenes to gut the proposed new Development Code in Lyon County which would require: special use permits for mining exploration within the historic district; a cultural resources inventory before commencing with actual mining, a valid Nevada Antiquities Permit and reasonable oversight by the Nevada State Historic Preservation Office.

There should have been a follow up interview with the Comstock Residents Association on all these points.