The destruction of cultural sites for the sake of gold and massive groundwater pumping is all too familiar in the Great Basin.

The Long Canyon Mine is easily seen from Interstate 80 just west of Wendover, Nevada - a scar on the east side of the North Pequops Range. The open pit stretches along the mountain front with a large waste rock dump, heap leach pad, and tailings dump in the valley. The Johnson Springs Wetland Complex sits on the south end of the mine where the mountain front dissolves into the valley. The Complex creates a large wetlands and produces between 800 and 1,700 gallons per minute of clean spring water, which is the historic source of drinking water for the town of Wendover.

The area and the springs are also culturally significant to the Goshute people. As Stated by Chairman Rupert Steele:

The cultural impact of the mine is that there will be ancient remains, inadvertent discovery of ancient remains which are my ancestors that we buried there along with archaeological finds such as arrowheads pottery homes that were once inhabited by my people. Along with that it would be the water sources, the plants, which we use for food and medicine. Whatever we use out there, our four legged brothers the antelope the deer, and our winged brothers the eagles the different species of birds we use their feathers in our ceremonies.

In fact, the depth of the cultural value in the region is so profound that the Confederated Tribes of the Goshute Reservation filed a petition for a stay on the mine on May 5, 2015. The legal petition stated that the mine would result in the “…destruction of thousands of cultural artifacts and hundreds of cultural sites.” The petition clearly articulates the significance of this destruction:

The destruction of those cultural resources and cultural sites can never be reclaimed. It is purely irreparable. Those resources and sites hold significant components of Goshute history and cultural. The removal of thousands of artifacts from the Project Area through data recovery mitigation permanently destroys the artifact-land-tribal connection that is an essential part of who tribal people are and how they know their cultural history. So, along with the destruction of resources and sites, the destruction of Goshute history and culture is purely irreparable.

According to Chairman Steele, the tribe has not been allowed sufficient access to important areas within the mine’s plan of operations boundary. Thus, there has not been adequate cultural monitoring to minimize the damage to cultural sites.

Continued on page 3
Aimee Boulanger has stepped down from the Great Basin Resource Watch Board and we want to thank her for her many years of service. Aimee's efforts to protect communities and the environment from the impacts of mining have spanned 25 years, and she is now one of the most respected public mining policy experts anywhere. She began working with the Mineral Policy Center (now Earthworks) in the 1990’s, has led several environmental organizations since then, and is now the Executive Director of IRMA (Initiative for Responsible Mining Assurance). Started by the Mineral Policy Center several years ago, Aimee has guided IRMA with the support of environmental leaders and progressive representatives in the mining industry, to develop the most effective auditable standards to help ensure that a mine will minimize the impacts it will have. Aimee's thoughtful and diplomatic approach, along with her very able staff, has encouraged mining companies to participate in this process, and IRMA certification is now being actively considered by several mining companies. The staff and board of GBRW wish her the best, and will continue to work with her on IRMA and encourage mines in the Great Basin to become certified under IRMA.

Needed Reforms

GBRW has identified a number of mining-related reforms for Nevada

Mining Pit Lakes In Nevada, mining open pits are generally not reclaimed. This means that the open pit is not backfilled and contoured for post-mining use. Instead, it is fenced off to prevent human and wildlife access. Pits that extend below the water table fill with water after mining has ended. That water, called a pit lake, serves no use. If the open pit had not been created, the groundwater would have been used as irrigation or drinking water. But, the water in the pit lake is wasted because it has no assigned use.

As active mining projects in Nevada come to an end, GBRW estimates that the amount of water destined for pit lakes is about 1.5 million acre-feet. (One acre-foot equals 325,850 gallons.) But, under current regulations, Nevadans cannot use this water.

Unreclaimed pit lakes could be seen as irresponsible water management and a violation of the intent of Nevada law. The Nevada legislature in NRS 534.020 states “[I]t is the intention of the Legislature, by this chapter, to prevent the waste of underground waters…”. Nevada regulations must address pit lakes and require that the water be available for a predetermined beneficial use. Mining companies may need to modify mine plans to accommodate beneficial uses of pit lake water.

Intergenerational Pollution Many mines in Nevada could be expected to treat toxic drainage for over a thousand years, which means pollution will become an intergenerational concern. But, Nevada regulations do not address this problem. In fact, Federal and Nevada law allow the existence of long-term-polluting mines as long as the operator can demonstrate that there will be no toxic releases. The intergenerational water treatment process is likely to be interrupted or could fail completely, creating long-term impacts. Mines requiring intergenerational treatment need to evaluate a total failure scenario at 50, 100, or 200 years out to determine potential consequences to future generations if treatment ends prematurely. In addition, existing mines, whose operating plans include perpetual treatment, must not create an additional burden on future generations. Mine expansions must not result in a greater volume or toxicity of water pollution.

Legislative intent and direction must clarify whether Nevada will allow mines that require indefinite treatment of water pollution, and address existing mines slated for intergenerational treatment.

Community Right-to-Know Communities and public interest groups must have access to independent analysis of mine projects. Common practice is for mining companies to pay contractors to handle most of the technical analysis of a mine proposal, so how would a community know if the analysis were incorrect or biased? A community technical support fund must be created to allow an independent third party review. Permit fees would pay for the fund, which would be managed by regulators. The fund will ensure better analysis from mining contractors and create greater public trust in the permitting process with fewer lawsuits.

We will be working with our primary partner the Progressive Leadership Alliance of Nevada to advance these reforms.
NEW MAPPING PROJECT EXPLORES ZONES OF INFLUENCE FOR MINE OPERATIONS

By Sierra Jickling and Kate Berry

Great Basin Resource Watch, in partnership with the University of Nevada/Reno’s Office of Undergraduate Research and Department of Geography, recently began a project with students to examine the spatial extent of the area of influence of mining.

The mining industry tends to capture the extent of its environmental impact solely in terms of the physical footprint of a mine. For example, the total area of the state of Nevada is 70,766,080 acres. All of the mine plans in the state occupy about 209,603 acres, which represents close to 0.3 percent of the state. From this perspective, it looks like mining would have little relative effect on the environment, but this is misleading and inaccurate. This approach underestimates many of the additional effects of mining, and restricts the public’s ability to understand the full scope of the consequences of regional mining operations.

The Zone of Influence Mapping Project will analyze and better represent the full zones of influence from mining operations with a state map showing how mining operations affect more than the physical and ecological landscape.

In particular, since mining operations are water intensive, it is important to understand not only how much water is used, but also how mining use impacts the regional water ownership of local communities. Mines need to pump water for industrial use. Mine operators must acquire water rights to pump water away from the mining site to extract minerals below the water table.

In Nevada, water rights can be acquired by filing an application with the State Division of Water Resources. Mine operators in rural Nevada often negotiate with farmers, ranchers, and municipalities to secure water rights and can easily buy the rights if the owner is willing to sell. If not, water rights transfers require additional persuasion or monetary settlements from litigation. The acquisition of water rights can influence community dynamics, which is one way mining alters more than the land.

Given the importance of water for mining operations, the first phase of the Zone of Influence Mapping Project focuses on how mining influences the amount and distribution of water rights and use at the Long Canyon Gold Mine in eastern Nevada’s Goshute Valley Basin. Nevada Gold Mines (NGM), the joint venture between Barrick Gold and Newmont Goldcorp, holds 28% of all active permits in the basin and 45% of all surface and groundwater allocated in the basin. NGM also holds water rights for the Long Canyon Mine under two subsidiaries: Elko Land and Livestock Company and Fronteer Development.

NGM’s extensive water holdings are an example of how mining companies acquire control over significant water rights in rural areas, which gives industry leverage and, in the long term, the ability to transfer water rights to the highest bidder.

In 2020, the mapping project will add more mines to the water rights analysis and look at other influences on water quality and land use.

Now, Newmont Mining Corp and Nevada Gold Corp (merging most of Newmont and Barrick operations in Nevada) plan to expand the Long Canyon Mine and excavate to much greater depths. Currently, the mine is pumping about 4,000 gallons of groundwater per minute (GPM), but under the expansion, pumping is expected to increase to between 10,000 and 45,000 GPM. This level of pumping will have an enormous affect on springs in the area. Of particular concern is the Johnson Springs Wetland Complex (JWSC), which is connected to the carbonate aquifer system, and is expected to dry up from the pumping at the mine.

Nevada Gold is developing a mitigation plan to compensate for the negative impacts on the JSWC. The plan is the usual water replacement scheme—where water is artificially supplied to the springs complex—but there is no attempt to protect the sources of the springs.

Many migratory and endemic species, including the relic dace, depend on the wetlands sustained by the springs, which are also of cultural importance to the Goshute. GBRW expects that the mitigation plan presented to the public will be unacceptable to the Goshute and to those concerned about the environmental damage from massive pumping.

The BLM has informed GBRW that the first phase of permitting the expansion, called scoping, is expected by the end of this year. We will keep you posted on the process and how to support the Goshute people and protect the cultural and environmental richness of the area in the North Pequops.
COMSTOCK RESIDENTS FIGHT TO PRESERVE THEIR NEIGHBORHOODS & HISTORIC DISTRICT

In March 2018, the Nevada Supreme Court handed down a unanimous ruling in favor of the Comstock Residents' Association in its fight against Comstock Mining, Inc. The ruling affirmed public access to government officials' personal communication devices and emails when used to conduct public business. The 2018 Bristlecone reported that the suit revealed a pattern of secret intercommunications between CMI and Lyon County officials.

Since then, legal proceedings against county commissioners have not favored residents. Savesilvercity.org reports:

"Judge Robert Estes of Lyon County Third Judicial District issued a judgment on May 14, 2019, in favor of Lyon County and Comstock Mining, Inc. (CMI) in a lawsuit brought by the Comstock Residents Association and other Comstock residents. The plaintiffs argued they were denied due process when the ... commissioners approved a 2014 master plan amendment and zoning change potentially opening the company's property in Silver City to open pit mining."

The extensive article “See You in Court” provides more details and a comparison to a 2009 decision by United States Supreme Court, Caperton, et al.

In August, CMI announced the sale of its Storey County mining properties and the Lucerne property next to Silver City—except for processing areas in American Flat—to Tonogold Resources, Inc.

In October, CMI announced more major changes in their operations, including selling Silver Springs non-mining assets for $10.1 million, leasing additional mineral claims, and changes to Mercury Clean Up LLC, a mercury remediation venture operating at American Flat.

CMI has always bought and sold property around the Comstock, but announced in its third quarter 2019 report that the company had created a qualified opportunity zone fund, whose Sierra Springs Enterprises Inc. has secured Lyon County approval for acquiring the Silver Springs Regional Airport, a 150,000 square foot manufacturing and processing facility, and other properties and water rights in a qualified opportunity zone... (CMI website). (David Toll in Nevaagram 220 on Opportunity Zones: “where people with too much money can get a tax break.”)

Savesilvercity.org says that CMI has become a “land speculator” to sell water rights:

"Even in the face of big debt and zero revenue, the company continues to acquire land through more debt and more dilution of shares... all without any mining or any plans to mine. And forget about the Tonogold so-called deal. It's a total farce. Ask yourselves why in the world would CMI dump the Lucerne if there was still hope it could be mined profitably."

According to a Tonogold Comstock project report found on its website, "...Following a review and analysis of the resource (Lucerne) by Tonogold's technical consultants, and when comparing the resource with actual past production, there is evidence that the official resource estimate may have been overstated by over 30%.” Nevertheless, the deal between the two companies was completed on November 19, 2019.

In spite of all this, the Silver City Arts scene continues to thrive. David Cote is a New York City-based, award-winning opera librettist and playwright who was a visiting artist this summer at the Resident Artist Program. He said his skit was inspired by the residents of Silver City: “I wrote a 2-page sketch for them, satirizing the greed and delusions of companies trying to capitalize on the mythologies of the past.”

DEVELOPMENTS AT LYON COUNTY’S ANACONDA MINE

Last year, we reported that oversight of the cleanup at the Anaconda Mine had been transferred from the US EPA to the Nevada State Department of Environmental Protection (NDEP). This action deferred listing of the mine as a Superfund site, after much back and forth between the City of Yerington, the Yerington Paiute Tribe, Singatse Peak, an exploration company, the BLM and ARCO, which owns part of the site and bears much of the cost of cleanup.

To help inform the public, in early August GBRW, the Yerington Paiute Tribe, and Progressive Leadership Alliance of Nevada co-hosted a presentation and tour of the mine, giving everyone an opportunity to get the latest news on the site.

As for technical developments, the Nevada Division of Environmental Protection (NDEP) recently released numerous remedial investigation reports, including the OU-4a Human Health Risk Assessment Screening Level Ecological Risk Assessment Draft Work Plan and the revised draft remedial investigation of the Wabuska drain. These documents are available at https://bit.ly/2OMKr9

On November 19, NDEP hosted a public meeting in Yerington to report on site closure progress, groundwater, and the bottled water program, scheduled to be significantly scaled down.

A related issue has GBRW’s attention. Federal Bill H.R. 1813 would transfer 2,062 acres on the Anaconda site from the BLM to Arco. As is the case with other privatization bills, like Pumpkin Hollow in Lyon County, the action removes the acreage from NEPA protections, including public comment. Nevada has less state-based oversight, which could mean more impacts to land, water and cultural resources.
Gemfields is a proposed open pit gold mine about a half mile north of the town of Goldfield, Nevada on the approximate border between the Great Basin and the Mojave deserts.

Gemfield Resources, Ltd. (GRL) has gone through the all permitting processes, state and federal, to mine the historic site. According to GRL’s parent company, Waterton Global, mining and processing should begin in Spring 2020.

The Gemfield Project will occupy approximately 1,214.2 acres of BLM administered land and 721.7 acres of private land. The project will include, besides the mine pit, more exploration activities, haul and secondary roads, dewatering wells, crushing and screening operations, a heap leach pad using cyanide processing and waste rock disposal sites.

The mine footprint will require relocating 2.5 miles of U.S. Highway 95 further west. The Nevada Department of Transportation began working on the relocation in August 2019. Also required will be extensive changes to the Goldfield water system, and additional wells. It is unclear who pays for relocating 2.5 miles of Highway 95.

It should be noted that the land package owned by Waterton, based in Toronto, consists of approximately 15,000 acres and 1150 mining claims. Two other deposits expected to be developed, McMahon Ridge and Goldfield Main, lie within the land package.

Kevin Emmerich of Basin and Range Watch, Beatty NV, shared his concerns with GBRW about the deleterious effects of exploration and development, both immediate and over time, on this extensive land holding. With exploration/development over 15,000 acres will come an enormous number of uncontrolled secondary roads and other damage. Exploration roads are covered by NEPA if they are more than 5 acres, but many are missed by the BLM, he said.

A two-finger pit lake is expected to form in the mining pit when operations end in approximately 12 years.

According to BLM documents, the mine closure plan allows for the management of pit water quality by pumping process water into it at the cessation of mining, at a maximum rate of 500 gallons per minute until the predicted equilibrium elevation of each lake is reached. The rapid filling is intended to improve the pit water quality more quickly than with a passive infiltration scenario.

GBRW recommended in its comments on the EIS that the open pit be backfilled to avoid a very toxic pit lake. Instead, BLM is allowing a rapid infill of the open pit to address the water quality concerns, which was contrary to the advice of a mine consultant assigned to the Gemfield project. John Hadder, GBRW’s executive director, pointed out that a toxic pit lake is likely in the long term due to evaporative concentration and in spite of rapid infill with nontoxic water.

Emmerich too expressed concern that pit groundwater, without backfilling, will contaminate groundwater.

Hadder stated that NDEP (Nevada Department of Environmental Protection) may be adopting a wait and see attitude as they did for Mt. Hope, which in not acceptable. NDEP is conducting an independent review, but are allowing a poor practice (rapid infill rather than backfilling the pit) to commence without addressing possible consequences upfront.

Comments in the NEPA documents from residents of Goldfield focused on the possible bad effects of blasting vibrations and other noise a short distance away (approximately .5 miles) on historic homes and other buildings constructed of unreinforced rock.

Other local citizens wrote about the lack of a local workforce, and housing, infrastructure and emergency services for incoming out-of-area workers.

Considering the useful life of the mine may be twelve years or less, as with so many other gold mines, you can’t help but question whether the many collateral consequences are worth the profits going to a Canadian company.

Bodie Hills Project Will Impact Sacred & Sensitive Lands

GBRW is tracking applications from Radius Gold for exploration in the Bodie Hills, above Bodie, California, and across the border in Nevada’s Aurora Mining District.

Many challenges exist at these sites, including inaccessibility and the additional permit required by the California Environmental Quality Act. Significant cultural resources, including the sacred mountain Bald Peak, are also within the project area. And, the Bodie Wilderness Study Area surrounds the proposed projects, providing outstanding natural and cultural values, including the bi-state sage grouse, the federally threatened Lahontan Cutthroat Trout and an eligible Wild and Scenic River. Radius Gold is expected to release an official application soon.

Stories by Susan Juetten
Nevada Faces Challenges in Its Renewable Energy Response to Climate Change

By Ian Bigley

As I write, thousands of Californians are without power, Las Vegas is the fastest warming city in the nation, and Nevadans face uncertainty about a limited water supply. These are some of the current impacts of past state and federal policy decisions and climate change. Nevada is likely to play a key role in our collective efforts to face climate change, and a primary supplier of metals needed for renewable energy and related technologies.

As the public invests in a green energy economy based on distributed generation of energy and electric transportation it is expected that Nevadans and the Nation will be building a lot of solar panels, copper wire, and lithium batteries. If Nevada’s goal is to responsibly supply materials for renewable energy technology, then we must pursue certain reforms to mining...including the 1872 General Mining Act, reform of laws to address perpetual mine pollution.

New copper mines supplying the manufacture of renewable energy products are opening up in Nevada, even as we continue to struggle with the toxic legacy of past projects. In Lyon County, the Pumpkin Hollow Mine could start production at the end of 2019 by side-stepping the necessary environmental analysis required by the National Environmental Policy Act. Reclamation activities have restarted at the nearby abandoned Anaconda Copper Mine after decades of gridlock. Anaconda should serve as a reminder of the potential costs of mining that can fall on communities. The site’s contaminated groundwater has forced many to rely on bottled water and creates an economic stigma on investments in the region.

Long term impacts aren’t limited to historic mines. The Phoenix Mine, near Battle Mountain, which produces gold, silver and copper, is planning to expand. It has a closure plan that involves actively treating acid mine drainage at a rate of about 3 million gallons per year for potentially hundreds to thousands of years.

Lithium is another key metal in the emerging green energy economy (see graph). It is used for high energy density batteries in everything from the computer I am writing this on to electric vehicles and battery storage to support a distributed grid.

The majority of lithium comes from South America, though Nevada is home to Silver Peak Mine, the only producing lithium mine in the US, and there are numerous proposals to open more lithium mines. The Thacker Pass project owned by Canada-based Lithium Nevada has presented itself as a new kind of company, sensitive to community and environmental concerns that plans to go above and beyond environmental standards required by law. We will hold the company to this claim. Others, such as the Rhyolite Ridge project owned by Australian company, Loneer, also pose problems. The Center for Biological Diversity recently filed suit to protect endemic buckwheat at the project area which is being obliterated by mining exploration activities.

We are seeing increasing interest in extraction of metals used in renewable energy technology in the Great Basin, thus Nevada may play a vital role in producing those metals. At the same time communities in the Great Basin will shoulder the affects of mining. It is critical now to avoid repeating the extraction disasters of the past, and usher in an age where both industry and policymakers are held accountable to communities and implement sound environmental practices.

A ban on perpetual treatment at mines would help limit the number of sites with long-term pollution and ensure that mining occurs where the impacts are the least. Current efforts to reform the federal 1872 General Mining Act are also crucial to allow communities to say no to mines that would impact sacred sites, water sources, and areas of critical environmental concern.
Pan-American’s optimism about re-opening the mine shows a disregard for the community in light of results from the Center for Conservation Studies’ (CECON) 2019 study, which was conducted by a multidisciplinary team of Guatemalan professionals to examine the true impacts of the Escobal mine. Their public investigation detailed the mine’s negative affects the community and environment, such as drying up freshwater springs relied on by villages, contributing to increased levels of arsenic in the water system, and exacerbating inequality. These results provide further validation and evidence to back community opposition to the mine.

The CECON investigation underscores the need for independent third party analysis of mining operations. Globally there is a need for a second opinion at mine sites to ensure that the general public is well-informed about the process of mine permitting and the community perspective.

Tahoe Resources’ shares subsequently tanked, and the company was purchased in November by Canadian mining company, Pan-American for $1.1 billion. Pan-American is now one of the world’s largest silver mining companies.

Tahoe Resources’ sale to Pan-American points to the successful influence of community activism and resistance against a company operating without social license, but the Xinka are still fighting for their right to consultation that was upheld by the Constitutional Court. Their struggle for true consultation includes battling the reduced area of influence that has been maintained for the mine and was illegally determined prior to consultation. According to the North American Congress on Latin America, the Ministry of Energy and Mining, responsible for facilitating the consultation process, has also failed to contact the proper “legal representatives of the Xinka Parliament”.

The Financial Post reports that Pan American CEO, Michael Steinmann, stated that he is “very confident that we can bring that mine back to running”. But, what Steinmann fails to understand is that a right of consultation would support permanent closure of the mine in the face of widespread and united local opposition.

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The CECON investigation underscores the need for independent third party analysis of mining operations. Globally there is a need for a second opinion at mine sites to ensure that the general public is well-informed about the process of mine permitting and the community perspective.

In Nevada, we can expose mining companies that operate here and that are responsible for human rights and environmental violations elsewhere. GBRW plans to develop a list of these kinds of mines, especially those with violations related to human rights and community self determination.
“These gigantic pit lakes scare me,” said Nevada State Environmental Commissioner Jim Gans at an appeals hearing in September. GBRW had appealed the decision by the Nevada Division of Environmental Protection to reissue a Water Pollution Control Permit for the Mt. Hope Molybdenum Mine. Gans added, “If the public out there isn’t asking questions … they should.”

GBRW first filed its appeal of the permit in the fall of 2018. We met with agency staff and representatives of General Moly, Inc (GMI) to resolve our concerns without going to a hearing. But, neither the agency nor the company offered changes to the permit or process that satisfied our concerns. Pursuing an appeal brought out clear problems with the permitting process and informed the news media about the reforms we want.

In September, the three panel judges of the Commission were torn as to what action should be taken regarding the permit. GBRW provided testimony about the need for Nevada regulations to address a post-mining use for pit lakes. Another concern was faulty analysis by contractors paid by GMI that seriously underestimated the toxicity of the water expected for the pit lake. In addition, the permit will allow toxic mine drainage for hundreds of years that would eventually contaminate groundwater. At the end of the hearing the Commissioners didn’t want to support the mine permit, but they also found that the state agency had not violated the law. GBRW came to significantly different conclusions about the water quality of the pit lake and the potential for long-term inter-generational water pollution than GMI and the agency. The Commissioners directed the agency to “work with GBRW in resolving the technical concerns raised and better regulations regarding mining pit lakes.”

We hope that the state agency will truly work with GBRW to develop regulations for a post-mining use of pit lakes and to avoid wasting Nevada’s precious water, and look forward to a transparent and collaborative resolution process.

Since the hearing, the BLM has signed a record of decision (ROD) accepting the current plan of operations and right of way for the mine. This is the second time BLM has approved the mine. GBRW challenged the original Environmental Impact Statement (EIS) and ROD in 2013 and won at the appeal level in December 2016 when the Ninth Circuit Court of Appeals vacated the EIS and ROD, directing BLM to correct the errors. A little over two years later, BLM issued a Supplemental EIS to address the deficiencies in the original EIS and clarify its position on the federally-protected Public Water Reserves in the region. GBRW found problems with the Supplemental EIS, so we filed again in federal court in October 2019.

The air quality analysis remains inadequate under the law and we still argue that the Public Water Reserves are not protected under federal law, PWR #107. We also state in our legal filing that BLM has illegally applied the 1872 Mining Law to the Mt. Hope site, much like what happened with the Rosemont Mine in Arizona. That EIS was recently overturned.

In the meantime, the Mt. Hope Mine Project struggles to gather sufficient funding to move forward. Last summer, AMER International Group backed out of its financing agreement, dealing GMI a substantial blow.

The Mt. Hope Mine as proposed is dangerous to the community and its permitting underscores the need for reform. It is at the heart of our reforms on pit lakes, inter-generational pollution, and community right-to-know.