

*Abandoned Mine Lands Closure Plan*  
Comments on the Environmental Assessment

AML Closure EA Project  
Office of Minerals/Oil and Gas Support  
National Park Service  
PO Box 728  
Santa Fe, NM 87504-0728

Dear National Park Service EA Coordinator,

Thank you for the opportunity to provide the following comments on the National Park Service's Environmental Assessment to cleanup a number of abandoned mines sites within the Coronado National Memorial, Grand Canyon National Park, Organ Pipe National Monument, and Saguaro National Park, all located in Arizona.

The Arizona Mining Reform Coalition is very supportive of this plan, and we look forward to the final cleanup of part of the troubling legacy of mining activities which laid waste to much of our American West.

The Arizona Mining Reform Coalition works in Arizona to improve state and federal laws, rules, and regulations governing hard rock mining to protect communities and the environment. We work to hold mining operations to the highest environmental and social standards to provide for the long term environmental, cultural, and economic health of Arizona. Members of the Coalition include: The Grand Canyon Chapter of the Sierra Club, Earthworks, Save the Scenic Santa Ritas, The Empire-Fagan Coalition, The Dragoon Conservation Alliance, the Groundwater Awareness League, the Concerned Citizens and Retired Miners Coalition, the Center for Biological Diversity, and the Sky Island Alliance.

The National Park Service has inventoried abandoned mines within the boundaries of the four Park units that are taking part in this cleanup effort. The Park Service has determined which sites are most in need of cleanup and has determined what the final cleanup of each feature will look like.

We commend the Park Service for taking the initiative to move ahead on this effort.

We made a number of comments during the scoping process that, for the most part, were taken into account. However, we would like to reiterate a couple of our concerns that may not be reflected as well as they might in the Environmental Assessment.

Water

We note that several of the mine features (for example, the State of Texas mine in the Coronado National Memorial) that are part of the cleanup currently have water associated with them. It is not clear whether the water quality has been tested at these sites, nor is it clear

whether there will be ongoing monitoring of the water quality where water will continue to flow. While we support using the water coming from these mines for wildlife, we would like to make sure that the quality of this water is not now impaired nor will be in the future. If the water quality is impaired or will become impaired, will there be further cleanup efforts at these sites to bring the water quality up to acceptable standards?

Also in the Coronado National Memorial, the EA mentions that there could be arsenic at the Headquarters mine, but says that the water quality issue is being addressed in a separate action. What is the separate action and what will be the final outcome of that action? We would assume that there is a connection between the two actions that would lead to final cleanup, but this is not clear in the EA.

We remain concerned about the potential of acid mine drainage developing at all the mine sites that contain water and would recommend that if there is a reasonable chance that these sites would become acidic, that remediation be done during this cleanup process rather than waiting until it develops. At the very least, ongoing water monitoring should occur to make sure water quality at these sites remains within acceptable standards.

#### Access

We note that while the EA discusses the limited use of helicopters to access these mine sites to clean them up, that the use of helicopters may be more prevalent than necessary. As we mentioned in our scoping comments, while we appreciate the need to use helicopters to make sure the cleanup proceeds in an expeditious fashion, they should be used sparingly. The same concerns pertain to the use of motor vehicles at Organ Pipe. While we are not suggesting that either form of motorized conveyance be eliminated, we would prefer they be used in a judicious and sensitive manner

#### Adaptive Management

We note that Organ Pipe National Monument is planning to use adaptive management to select the best method of reclaiming some mine features while leaving them accessible to bat populations. We support the "trial and error" approach outlined in the EA, but would caution that in the past some federal agencies have used adaptive management as an excuse to avoid or delay agency action or offer less than full cleanup. We are confident that this is not the case here, but still feel obligated to share our concerns. The three year time table laid out in the EA for a final solution seems adequate to us.

Finally, we understand that resources are limited for this project and that the scope of the project leaves a lot of features waiting for additional funding. We appreciate the method of starting the process of determining how these "second tier" sites will eventually be cleaned up, but would urge that the National Park Service do it's best to obtain the resources to treat these features as well.

In general, let's look at this cleanup and the use of stimulus money to really get the most "bang for the buck" by treating this effort as a chance to provide on the job training to volunteers

and/or unemployed persons. Since, we hope, cleanup of abandoned mines across the West will become much more common, providing on the job training while at the same time accomplishing the cleanup goal, would be highly advantageous.

#### In Conclusion

We support this effort and commend you for the initiative you've taken to move forward in this important project. We wish you speedy success.

We commend the National Park Service for the fine job it has done in preparing the EA and while we've made a few comments, we are comfortable with the cleanup as outlined in the EA. Please keep us informed as this project proceeds as we may have further comments or suggestions in the future.

Sincerely,

Roger Featherstone, Director  
Arizona Mining Reform Coalition  
PO Box 43565  
Tucson, AZ 85733