

Arizona Mining Reform Coalition ♦ Center for Biological Diversity ♦
Sierra Club – Grand Canyon Chapter ♦

October 26, 2017

Coronado National Forest
ATTN: Galiuro Exploration Drilling Project
300 W. Congress St.
Tucson, AZ 85701

Comments submitted via online form at:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=48479>

RE: Comments on Galiuro Exploration Drilling Plan Environmental Assess

These comments are submitted on behalf of Arizona Mining Reform Coalition (“AMRC”), Center for Biological Diversity, and the Sierra Club – Grand Canyon Chapter. Any or all of these organizations may also submit additional comments apart from these comments that are also incorporated into these comments.

Organizations

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. AMRC works 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: Apache – Stronghold, Center for Biological Diversity, Concerned Citizens and Retired Miners Coalition, Concerned Climbers of Arizona, Dragoon Conservation Alliance, EARTHWORKS, Empire Fagan Coalition, Environment Arizona, Groundwater Awareness League, Maricopa Audubon Society, Patagonia Area Resource Alliance, Save the Scenic Santa Ritas, Grand Canyon Chapter of the Sierra Club, Sky Island Alliance, Spirit of the Mountain Runners, Tucson Audubon Society, and the Valley Unitarian Universalist Congregation.

The **Center for Biological Diversity** is a non-profit public interest organization with headquarters located in Tucson, Arizona, representing more than 1.5 million members and supporters nationwide dedicated to the conservation and recovery of threatened and endangered species and their habitats. The Center has long-standing interest in projects of ecological significance undertaken in the National Forests of the Southwest, including mining projects.

Sierra Club is one of the nation’s oldest and most influential grassroots organizations whose mission is “to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth’s ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments.” Sierra

Club has more than 2.4 million members and supporters with 50,000 in Arizona as part of the Grand Canyon (Arizona) Chapter. Our members have long been committed to protecting and enjoying the Tonto National Forest and have a significant interest in the proposed Resolution Copper Mine and related activities.

We have received your letter noticing the public opportunity to comment on the Environmental Assessment regarding Kennecott Exploration Company's proposal to drill in the Galiuro Inventoried Roadless Area (IRA). As we understand it, 12 holes would be drilled on sections 8, 17, 18, and 19, one or two miles northwest of the Galiuro Wilderness, about 12 miles east of the San Pedro River near the town of Mammoth. All equipment and crew would be transported by helicopter.

Following are our comments on the exploration plan.

The EA is lacking in information on baseline conditions in the proposed action area. While there is a discussion on general characteristics of the area, a discussion of baseline water and air conditions that could be effected by this action are inadequate. The EA needs to show clearly what conditions exist before an action is approved as a measure to judge not only whether the action is likely to affect public lands managed by the US Forest Service and other federal agencies, but also what specific conditions are changed or impacted if the action is approved.

The EA only lists two alternatives, the no action alternative (which the Forest rejects out of hand) and the company's proposal. Additional alternatives (for example, an alternative that lowers the number of drill holes or changing location to lessen the impact), should have been analyzed.

The purpose and need section of the EA is simply a discussion that the Forest (according to your interpretation) must approved the drilling project. This is inadequate and should show how the public would benefit from this exploration project potentially taking place on our land. While it is likely that Kennecott Exploration's needs are met by the proposal, this is a far cry from the needs of the public which owns the land.

The EA needs a discussion on who Kennecott is exploring on behalf, what they are exploring for, and what a successful exploration effort might result in. In light of the special conditions that this exploration would take place within an Inventoried Roadless Area (IRA) with the potential of eventual Wilderness designation, should trigger a more thorough examination of the proposal than what might be contemplated for public lands managed by the Forest Service without special designation. While we appreciate that the Forest Service chose to write and Environmental Assessment for this project rather than what seems to be your default (a categorical exclusion) due to the length of the project and the fact that the project would take place within an Inventoried Roadless Area, this EA disappointing in the lack of detail and analysis. We would have thought that you would have taken the time to write and EA that fully

analyzes the impacts this proposal would have to the IRA both in the short term and the long-term consequences should this plan be approved and irrevocably alter the character of the IRA.

The EA is inadequate because it does not analyze the impacts from the exploration plan on the IRA regarding its possible future designation as a Wilderness Area. As the Forest well knows, IRAs are to be managed to retain the qualities making them eligible a Wilderness. Would this exploration plan render the IRA ineligible for future Wilderness designation? No matter what answer is given to this question, there needs to be an analysis of the impacts of this plan on future conditions including all future impacts (including negative economic conditions) if this exploration plan changes the IRA designation or changes conditions that could render the area as ineligible for future Wilderness designation.

There is no discussion in this EA about cumulative effects. The possible impact of this project, especially if it would result in a future mine, must be discussed and analyzed in this EA in light of the fact that it would take place in an IRA that could in the future be designated as a Wilderness Area.

The EA is inadequate in examining the impacts of this action on trails in the IRA. While the EA mentions that the proposal would be visible from trails, it does not mention which ones and the level of this impact.

The EA does not thoroughly analyze the impacts of the proposal on springs within and adjacent to the IRA. As above, the mention of possible impacts without a full discussion or analysis is not appropriate.

The EA states that water would be supplied to the drilling pads by the placement of up to 2 miles of water hoses. There is no discussion on how these hoses would be placed (by hand, by helicopter, by mechanical means?), or what the impacts from the placement and then removal of hoses on the Forest. Each hose should have a flow metering protocol to ensure that hoses are not leaking during use which could change conditions to the Forest (including erosion, changing wildlife movement patterns or activities, or change the condition of soils and vegetation). A once a week "walk" of the water line, as indicated in the EA is not sufficient.

If this project is permitted, a condition of the permit must be that all water hoses must be removed. Mining companies are notorious for leaving water hoses on public land for years creating a negative impact to public lands. This must not be allowed if this permit is granted.

The EA is not clear on where pumps would be located if needed to boost water from storage tanks outside the IRA to the drilling platforms. Would these pumps be within the IRA? If so, how would they get there? Would they be carried by hand, by helicopter, or other means? How would they be maintained? What would be the impacts of maintaining these pumps? Would there be a spill plan? What would be done in the event of a fuel spill or accident? All of this must be analyzed whether pumps were planned within the IRA or not.

The EA did not adequately discuss and analysis of the impacts (all of them) from daily trips for a 3,000 gallon water truck to the water storage area. Would travel be on Forest roads? If so, what would be the impacts of this? If not, what would be the impacts to the IRA and other public lands from dust, noise, etc., from this travel?

The EA is silent on any details about the drilling project itself. It must disclose, discuss, and analyze how deep holes would be drilled, whether there would be multiple directionally drilled holes from each location and where those would go, the size of the hole, how the hole would be drilled, etc. All of this basic information about the proposal is not discussed in the EA and must be.

All drilling wastes should be removed from the drilling pads upon completion of each hole. It is not acceptable to bury drilling wastes containing materials foreign to the Forest, especially within an IRA.

Well holes must be invisible upon completion. Kennecott in past drilling operations have left a “reclaimed” bright yellow 8” or more diameter pipe sticking several feet into the air. This is not acceptable reclamation, especially within an IRA.

The EA states that the Invasive Species Control Plan and the Reportable Spill Response Plan would need to be incorporated into any permits should this project be approved. The public has a right to comment on those plans before the project is approved.

The EA’s discussion and analysis of the noise and impacts from the high level of helicopter use is inadequate.

The EA should consider the use of energy efficient (LED) lighting for the drill pads to limit the amount of diesel used and should also consider the use of solar or battery powered lighting.

Any final permits granted if this plan is approved should require compliance with dark sky lighting standards especially since drilling would be within an IRA and near a Wilderness area.

The EA includes a condition for treating water from a presumably contaminated well on the Old Mercer Ranch. It seems to use that it would be better to simply require that all water used for the project come from sources that are already certified for drinking water rather than the complicated procedures for treatment and reporting called for in the EA.

All sumps at the drilling pads must be lined instead of the wiggle room mentioned in the EA.

The discussion and analysis in the EA on the plugging of drill holes to prevent cross contamination of separate water tables is inadequate and must be redone to protect the water within the IRA.

The public should be able to comment on the fire plan, including fire in the event of a helicopter accident or from the use of pumps or other equipment away from the drilling pads before the plan is approved.

Conclusion

The EA written for the Galiuro Exploration Drilling Plan must be rewritten to correct the deficiencies mentioned in our comments above and a new Environmental Assessment be release for public comment before this plan is approve

We appreciate the opportunity to comment on the EA and request that you include the Arizona Mining Reform Coalition, the Center for Biological Diversity, and the Sierra Club – Grand Canyon Chapter, as interested parties and direct all future public notices and documents to us at the addresses below.

All three groups have provided scoping commented on this plan in addition to these and other comments submitted on the EA.

Sincerely,

Roger Featherstone



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