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June 23, 2017

Pinto Valley Mine EIS Comments  
2324 E McDowell Rd.  
Phoenix, AZ 85006  
[Comment@PintoValleyMineEIS.us](mailto:Comment@PintoValleyMineEIS.us)

Re: Pinto Valley Mine Scoping Comments

Dear National Environmental Policy Act Coordinator:

These comments supplement our original comments of April 27, 2017. They are submitted on behalf of Sierra Club's Grand Canyon Chapter and the Arizona Mining Reform Coalition ("AMRC").

**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 plus 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 Pinto Valley Mine and related activities.

**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, 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.

Thank you for the opportunity to provide this brief supplement to our April 27, 2017 scoping comments for the proposed expansion of the Pinto Valley Mine.

Since our April comments, we have learned more about the Carlota mine's plans to remain open for another three or four years. This is germane to this proposed action as the Carlota Mine is adjacent to the Pinto Valley Mine and affects the same aquifers and ecosystem.

We request that the Forest Service examine alternatives in the Draft Environmental Impact Statement (DEIS) involving Carlota. One alternative should examine the impacts if the Carlota Mine closes in the short term (4-6 years) and one if Carlota continues for the life of the Pinto Valley expansion proposal.

Since the Forest Service must examine the effects of the proposed action (mostly on private land) on the surrounding public lands, any large changes at the Carlota Mine are relevant to the Pinto Valley expansion and certainly from a cumulative effect standpoint. We suspect that if the Carlota Mine closes in the near future, the combined negative effects on the aquifers and ecosystem would lessen, but the DEIS needs to take a close look at what those effects would be. This would be useful and critical information for the Forest Service's decision-making process.

We request that the Forest Service conduct a water balance assessment under both of these alternatives.

The DEIS should also examine whether the expansion could give Capstone an opportunity to implement additional aggressive water and energy conservation, and alternative energy production to lessen the impacts to the surrounding public lands.

The DEIS should look at the opportunities for solar and wind generation as part of the closure and reclamation plan for the Pinto Valley expansion. Since the current plan would not allow for a full range of uses of Forest Service-managed public lands impacted by the Pinto Valley Mine, alternative energy generation would be an appropriate use of these lands.

Thank you for considering these supplemental comments.

Sincerely,



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