



May 27, 2020

Sarah Clawson
Bradshaw District Ranger
Prescott National Forest
2971 Willow Creek Road, Bldg. 4
Prescott, AZ 86301

Filed Electronically: objections-southwestern-prescott@usda.gov

Re: Riverbend Placer Mine and Lost Nugget Reclamation Project.

Dear Mrs. Clawson:

These comments/objections are submitted on behalf of Great Old Broads for Wilderness (Broads) and the Sierra Club (Sierra Club) Yavapai Group Grand Canyon Chapter.

Founded in 1989, Broads are advocates, stewards and educators for wild lands. Broads believes that the continuing drive for corporations to seek out and extract resources from our public lands creates an ongoing battle for Broads and other like-minded organizations. These activities exact a high price on the land. They impair air and water quality, disrupt or destroy wildlife habitat, and disturb the natural quiet and scenic beauty of the land.

The Sierra Club, founded in 1892, is a national nonprofit organization of approximately 2.7 million members and supporters dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. Sierra Club's Grand Canyon Chapter was organized in 1965, and, prior to that, our members were also involved in protecting Arizona's resources. We have a significant interest in protecting and restoring the water quality in Arizona's rivers, lakes, and streams. We are also concerned with protecting the health of the forest and wildlife. It is within that context that we are submitting these comments. Sierra Club – Yavapai Group has a long-standing interest in Prescott National Forest. We have participated in the forest planning process. Our 800 plus local members have long enjoyed the forest for hiking, trail riding, hunting, fishing, wildlife watching, and more. We conduct service projects in the forest and our members and volunteers are deeply concerned for the future.

We object to the Decision Notice and Finding of No Significant Impact for the Proposed Riverbend Mining and Lost Nugget Reclamation Project based on the following grounds:

Migratory Birds and Other Wildlife

You state that “Because the project area provides habitat for breeding migratory birds, a preconstruction breeding bird survey would be conducted prior to any vegetation removal within the proposed project area if activities are to occur during the breeding season of March 1 to August 31.” It is essential that you do this!

Then you state “If any nesting birds are observed in the project area, the proponent would immediately notify the third-party contractor who would consult with the Prescott National Forest and Arizona Game and Fish Department for implementation of mitigation measures.” We are concerned that you will be leaving the fate of nesting birds to the miners who could possibly not report nesting birds (or bats as you outline later in the SEA) and no one would be the wiser. We strongly suggest that you make unannounced inspections and/or other monitoring often during the life of the mining project.

Reclamation

It is not acceptable to us that you are relying on the 2005 Environmental Analysis, Decision Notice, and Finding of No Significant Impact for the Gold Basin Mine. These documents did not exist “climate change” because the theory did not exist in 2005. A new analysis is necessary incorporating climate change.

Although it is stated that “Pine Creek Mining, Inc., proposes to immediately reclaim the Lost Nugget placer claim of the Gold Basin Mine under the proposed reclamation plan.” (pg. 3.), no plan is proposed for the reclamation of the large and smaller rock piles, surrounding primarily a riparian forest of large sycamore trees; left by former large-scale riverbed dredging. This reclamation must be included in the proposed Riverbend Mining and Los Nugget Reclamation Project along with reclaiming the un-engineered roads that switch back up the hillsides and cause erosion down into the Hassayampa River and the roads that cross the river and its side canyons. In fact, you state that this reclamation is to be performed by the proponents to the “extent possible.” This sounds like it is optional. Reclamation is not to be optional! Reclamation must be required!

A bond in the actual cost of reclamation must be required from Pine Creek Mining, Inc. They must not be allowed to walk away from their destruction of our public lands, forfeiting a small amount of cash as part of the price of doing business, as has been the practice on the Prescott National Forest for many mining operations; leaving the taxpayers to foot the bill, if cleanup ever does take place.

Road 72

We are confused about where Road 72 will be rerouted. Your maps do not show the current road. Please show us where the current road is and where the new road is on the same map

Climate change

You state in the SEA: “Climate Change Climate change would likely cause a decrease in precipitation, higher temperatures, and a longer wildfire season, which would increase the probability of stand-replacing wildfire causing habitat loss for many species. Climate change would also lead to more opportunities for invasive species to establish and spread, and invasive species may outcompete species or their prey, or they may alter the species’ habitat (USGCRP 2009). However, the projected mine life is up to 15 years, perhaps an insufficient amount of time to see

large-scale long-term climatic impacts (for example, significant changes in elevational distribution of biotic communities). In addition, concurrent reclamation is planned for the Riverbend site, thus near the end of the maximum mine life most of the site will already have been reclaimed and native grasses, forbs, and shrubs would have been established. Immediate reclamation of the Lost Nugget site is planned, thus long-term climate change impacts as related to the project area are not anticipated." We disagree with your statement that "perhaps 15 years is an insufficient amount of time to see large-scale long term climatic impacts . . ." Prescott National Forest must monitor for climate change at the mine and environs at least on an annual basis to avoid potential harm to soil, water, river, wildlife, plants, trees, and fire hazards.

Recreation

In the SEA you state that there are no designated recreational sites near the project area. Anecdotal evidence from a recent trip (and many years of past trips) to the mine area by Broads Jenny Cobb and Dianne Hicks, revealed that the area is indeed (still) a popular recreation area for camping, swimming, and generally enjoying the natural beauty of the desert and riparian areas. Following recent rains, the swimming holes at the end of the road past the old mines were full, the waterfall running, and over 50 people (young and old) and their family pets camping, hiking, splashing around, picnicking, and cooling off in the river. Most of them were residents of nearby Wilhoit. Your maps do not show the road to the old mining areas which then continue further to camping, hiking, and river recreation sites. Will this road which crosses the river and existing tailings, remain open? Recreation in the area is indeed established!

Finally, does the PNF have a plan to halt operation and/or demand mitigation in the event of noncompliance or unforeseen hazards or otherwise damaging events during the course of the mining operation?

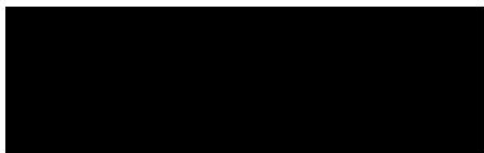
We understand that under the Mining Law of 1872 you must permit mining. However, we ask that you do everything within your authority to ease or mitigate the environmental impact on our forest lands

Environmental Partners For the wild,



Jenny Cobb
Leader Yavapai-Prescott Broadband
Great Old Broads for Wilderness





Thomas Slaback
Conservation Chair
Yavapai Group Sierra Club Grand Canyon Chapter

