

June 1, 2020

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

Emailed to: objections-southwestern-prescott@usda.gov

RE: Objection to the Riverbend Placer Mine and Lost Nugget Reclamation Project, Bradshaw Ranger District, Prescott National Forest

I am writing to object to the Riverbend Mining & Lost Nugget Reclamation Project Supplemental Environmental Assessment and Finding of No Significant Impact that is currently being considered for approval by the Prescott National Forest. I submitted scoping comments on August 15, 2017, even though the EA incorrectly states that only four organizations submitted comments (CBD, Sierra Club, Great Old Broads, and AGFD). This is consistent with the feeling I get that the Forest Service doesn't care about my perspectives, despite being a Prescott native and a professional forester.

The Environmental Assessment of this proposed project did not fully and carefully analyze all negative impacts to the Hassayampa River and associated floodplain and riparian habitats as I requested with my previous comments regarding this proposed project. The EA should have analyzed how previous and proposed placer mining by Pine Creek Mining Inc. or other entities has, or will have, permanent negative impacts on the streambed and the riparian corridor of the Hassayampa River; these we call *cumulative impacts*, and they are real. The EA did not analyze how Pine Creek Mining's previous and proposed activities have, or will, alter the course of the river and hydrologic function in ways that cannot be mitigated or restored.

The EA should have investigated and analyzed all areas where Pine Creek Mining Inc. has been negligent of their responsibilities as mining claim holders. The EA also should have better analyzed the proposed reclamation process to determine its efficacy in returning mine sites to "as close as possible to the original", pre-mine state. The EA did not, but should have analyzed whether it is even possible to reclaim the tremendous ecological damage that would be caused by the proposed project, especially the rare agave that will be killed by this miner.

The Hassayampa River is such an incredible source of diversity and beauty on the Prescott National Forest. In the EA, the Forest Service states that, "Much of the upper Hassayampa has been withdrawn from mining." That statement is completely untrue because the Prescott National Forest let the mineral withdrawal on the upper Hassayampa expire in 2019. The EA should have considered the cumulative effects of all new mining claims on the upper Hassayampa, as well as all mining claims along lower stretches of the Hassayampa, but it did not. In fact, the EA inaccurately stated that, "Much of the upper Hassayampa has been withdrawn from mining" when in actuality, the entire upper stretch of the Hassayampa is now under mining claims. Therefore, the current EA for this project is already out of date and inaccurate. Consequently, a revised and improved NEPA analysis is required.

I previously requested in my official comments regarding this project in 2017 that the Prescott National Forest Service host a public fieldtrip to the proposed mine sites. The public needs to hear for themselves and see on-site examples of exactly what activities are proposed and where. Recreationists that use the swimming holes along this stretch of the Hassayampa River could have seen how river access would change should this proposal be implemented, and could provide comments on how this might affect

their user-experience and ability to recreate. However, such a public fieldtrip never happened and yet the Forest Service has deemed there to be “no significant impact” to recreation without asking the recreationists what they think about the matter. In this regard, the project is “likely to be highly controversial” which is a litmus test for the requirement for need an EIS. The Forest Service wouldn’t want the public to know about this project, because if they did, the controversy would be apparent. This seems problematic to me as a public land owner.

Sincerely,

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Amber Fields

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