



September 25, 2020

Drake Cement limestone quarry expansion
Prescott National Forest
344 S. Cortez Street
Prescott, AZ 86303

Attn: Dale Deiter

Subject: Drake Limestone Projection

Submitted via email to objections-southwestern-prescott@usda.gov

Dear Mr. Deiter:

These objections with the Drake Limestone Quarry Expansion Environmental Assessment dated January 2020, are submitted by the Yavapai Group Sierra Club Grand Canyon Chapter and Great Old Broads for Wilderness, acting as partners to protect our public lands.

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 solitude. We conduct service projects in the forest and our members and volunteers are deeply concerned for the future well-being of our forests.

Great Old Broads for Wilderness (Broads) is a national non-profit grassroots organization established in 1989. We are advocates, stewards, and educators for the preservation and protection of wilderness and wild lands. Wild places, once destroyed, may be gone forever. Ours is a lifetime outlook on the benefits of protecting our wild, public lands. Broads, through Broadbands across the country, work with agencies in stewardship and monitoring of public lands.'

We are objecting due to the errors and omissions in the Drake Limestone Quarry Expansion Final Environmental Assessment (EA)

p. 5, 1.3 Need for Proposal. "This proposal is needed to allow the continuation of limestone mining for Drake's operations for an estimated 35 years to continue to meet current and projected regional needs for limestone used in the production of cement. The existing limestone deposit is estimated to be minded out by 2020."

We disagree with this evaluation unless your original EA for the cement plant's analyses was grossly flawed. At that time, you estimated that there was a least a 25-year supply of limestone in the current quarry. We estimate that the total quarry operation has been less than 10 years due to intermittent operation of the cement plant. You need to reanalyze the need for the proposal.

p. 11, 2.1.4 Dust Control. "Maintaining vehicle speeds below 15 mph on unpaved roads provides an additional best available control technology . . . "

p. 12, 2.1.6 Resource Protection Measures. "A plant-wide speed limit of 5 mph to further control and minimize fugitive dust from travel on unpaved roads . . . "

p. 24, 3.6.1 Air Quality Affected Environment. "These measures were determined to include restricting speed on unpaved roads to 15 mph and watering of roads on all operating days . . . " "Drake has additionally implemented a plant-wide speed limit of five mph to further control and minimize fugitive dust . . . "

These requirements cited above contradict each other and we believe there should be a 5 mph restriction on all plant dirt roads including not only in-plant and quarry roads, but also all the dirt access roads.

p. 16-17, 3.3.1 Water Resources Affected Environment Wild and Scenic Rivers. Apparently, the Prescott National Forest (PNF) had agreed to manage the Upper Verde River as a Wild/Scenic River to preserve its outstanding remarkable values (ORVs) until designation is approved or disqualified by the United States Congress. Therefore, the designated management segment is not over 60 miles downstream from its confluence with Hell Canyon.

p. 20-22, 3.4.1 Biological Resources Affected Environment

Bald and Golden Eagles. "Bald or golden eagles are not known to occur in the project area. The closest bald eagle nesting structure to the project site is in the vicinity of Perkinsville, approximately 10 miles southeast of the projects site. Bald eagles are known from the vicinity of Hell Canyon . . . "

The Sierra Water Sentinels for the last 14 plus years routinely see bald eagles and photograph them at the Perkinsville Bridge and Granite Creek confluence with the Verde River. Also, at the confluence we routinely see nesting Mexican Black Hawks. You also need to note that there are bald eagle nests in the cottonwoods located at Del Rio Springs.

Invasive Plant Species. "Noxious weed surveys have not been conducted specifically at this site; however, noxious weeds are known to occur in disturbed areas."

All noxious weeds must be removed before removal and stockpiling of quarry overburden. This also must apply to the area planned to store the overburden. A monitoring plan must be implemented to see that they do not repopulate disturbed areas of the quarries.

p. 23, 3.4.2 Environmental Impacts Modified Proposed Action

Invasive Plant Species. "The Modified Proposed Action would result in the gradual ground disturbance of up to 197.2 acres. This has the potential to increase the abundance of existing and new invasive plant species in the project area."

We have the same concerns as discussed on the previous page 22.

p. 23, 3.5.1 Heritage Resources Affected Environment. "PNF has determined four sites not eligible for listing on the National Register of Historic Places (NRHP) and determined five to be NRHP-eligible. Sites AR-03-09-01-1597, AR-03-09-01-1599, AR-03-09-01-1600, and AR-03-09-01-1601 are historical artifact scatters that are not eligible for listing on the NRHP. The potential for subsurface deposits among these

historic sites is low. No additional research, protection, or avoidance is recommended for these four sites or for the thirteen IOs."

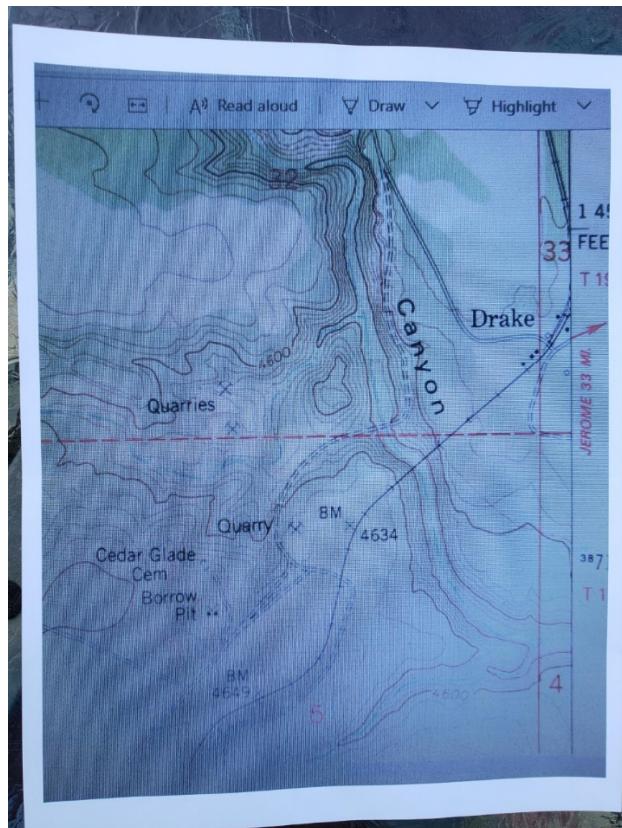
Say what? Four or five, or four sites. Make up your mind. Without additional research protection or avoidance, there is no way to know that subsurface deposits among these historical sites is low.

"Three sites (prehistoric artifact scatters) have been determined eligible (AR-03-09-01-1063, AR-03-09-01-1598, and AR-03-09-01-1602) for listing in the NRHP under Criteria A and D and two linear sites (historic railroad bed and historic road) have been determined eligible (AR-03-09-01-1195 and AR-09-01-810) for listing in the NRHP under Criteria A and D."

Are we to assume that these five determined eligible sites are those that you listed in the first paragraph where they varied between four and five and four sites.? Did the tribal representatives agree to the destruction of the tool-scatter sites?

p. 24, 3.5.2 Environmental Impacts Modified Propose Action. "Based on the avoidance and resource protection measures, the MPA will have no effect to historic properties."

This is not true. We must remind the PNF that Drake Cement publicly promised in the Daily Courier that the historic buildings of Drake (on the East side of Hell Canyon) would be preserved. The first thing that they did was to bulldoze those buildings as being in the way of their industrial plant. They built the plant around the cemetery which then wound up being a fenced plot in the center of the operating complex. The Drake townsite on the west side of Hell Canyon still exists as does the cemetery. Drake Cement cannot be trusted to adhere to the EA site protections (including Limestone Canyon). The PNF must implement a monitoring program to keep Drake Cement honest. When we toured the facility there was an accident releasing a cloud of unknown dust down upon us which we had to run away from. The previous week an electrician was critically scalded by an accidental molten release. Drake Cement was in violation of the law by not having shower and eye wash stations present at that time. We are concerned that with the expansion to the south of the quarry the cemetery located there may have the quarry surrounding it leaving it on the top of a fenced pedestal. (Paulden USGS 1979 Topographic Map, below)



p. 26, 3.7.1 Affected Environment. “The Limestone Allotment encompasses approximately 52,520 acres with 1,208 Animal Unit Months (AUMs), or 0.023 AUMs per acre.” “Permitted stocking rates on the Limestone allotment have decreased 88 percent from a high of 9,710 AUMs in 1988 to current based on a downward trend in range condition, rated poor to very poor.”

The Sierra Water Sentinels on our monthly observations routinely note cows grazing between the creosoted railroad ties of the newly created railyard facilities for both Drake and Clarkdale Cement Plants. Do you want to eat beef that has been eating creosote which is a known carcinogen? The railroad yard must be fenced to keep the cows out and protect human health.

“The closest WA is Sycamore Canyon Wilderness which lies approximately 15 miles east of the proposed project site. The Verde River, located approximately 7 miles to the south of the proposed quarry expansion area, provides recreational opportunities including fishing, boating and rafting, hiking, and wildlife viewing.”

The PNF analysis has omitted including the nearby Arizona Game and Fish Heritage Site at the Historical Campbell Ranch.

p. 31-34, 3.9.1 Visual Resources Affected Environment. “The existing white limestone soils are exposed in this area with cleared vegetation (Photograph 1).”

Photograph 1 is of the Limestone Canyon’s vegetative walls - - - no clearing is in evidence. It is actually Photograph 3 that shows the quarry. No restoration is visible according to the original “reclamation as you go” plan.

“The existing limestone quarry is briefly visible along SR89 at topographic openings including Limestone Canyon (Photograph 2), a small tributary to the north, and the swale in the southern portion of the project area (near MP 344).”

Photograph 2 is a view looking downstream in Limestone Canyon. The quarry is not visible in this photographic view.

“Views from SR89 are generally spotty, however, because of the topography (hills) and existing tall vegetation (Photograph 3).”

This is actually Photograph 5 showing the blocked by terrain and vegetation view from SR89 at the FR680 junction. At night, the plant lights are visible on SR 89 from Ashfork and along most of SR89 to the Drake Industrial Plant. They are also visible from I-40 as you drop down to Ashfork from Williams. These discrepancies in your photographic evidence must be corrected.

p. 38, 3.9.2 Cumulative Impacts to Resources

Water Resources. “As there are no direct impacts to surface waters other than a proposed 20-ft wide road crossing in Limestone Canyon, the modified proposed action would not contribute to direct cumulative effects to surface water resources.”

Nowhere do we find in the modified proposed action that the impacts to groundwater pumping will be analyzed. In the original Drake Cement Plant EA, the PNF had to go back and decrease the amount of groundwater pumping allowed as it was found to impact King Spring on the Verde River. This final EA allows for increased groundwater pumping from the Hells Well located near the quarry expansion site not only for increased cow utilization but also for dust control water. In all probability, this is an additional cumulative impact to the Verde River and King Spring. It must be analyzed.

In conclusion, you need to rescind and rewrite the Drake Limestone Expansion final EA to incorporate additional analyses and correct discrepancies as we have outlined herein above.

Environmental Partners for the Wild,

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Yavapai Group Sierra Club Grand Canyon Chapter

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Leader Yavapai-Prescott Broadband
Great Old Broads for Wilderness

Gary Beverly, PhD