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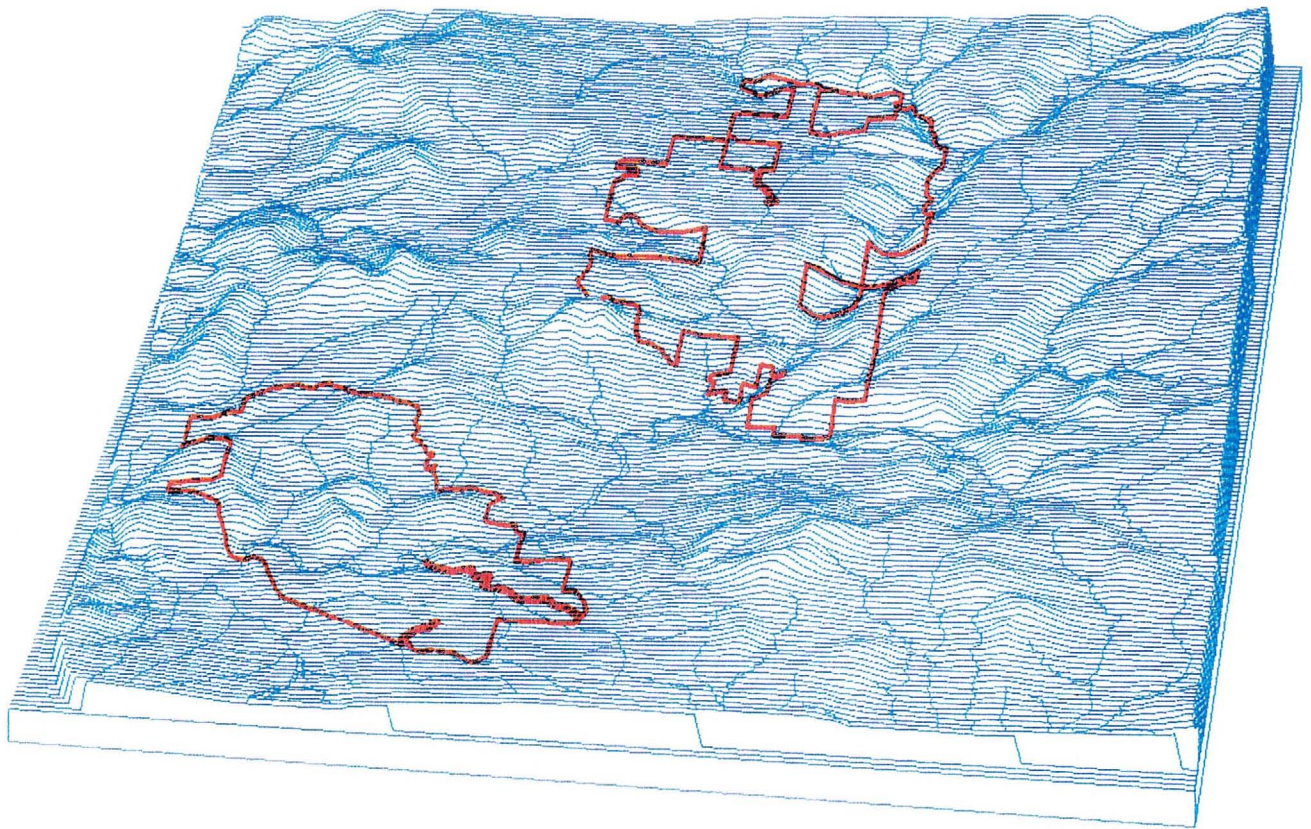
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Burro Creek Wilderness Evaluation

Executive Summary

For:  **CYPRIUS**
Copper Company



By: The Earth Technology Corporation
Tempe, AZ - Nick Hild, President
San Bernardino, CA - Larry Milliken, Director

18 September 1989

UPPER AND LOWER BURRO CREEK WILDERNESS EVALUATION

EXECUTIVE SUMMARY

The Earth Technology Corporation evaluated the Upper and Lower Burro Creek Wilderness Study Areas (WSAs), Yavapai and Mohave Counties, Arizona, to assess their suitability for inclusion in the wilderness preservation system. The primary basis for this evaluation was an assessment of visual and noise impacts of man's activities from within and without the WSA boundaries, based on a terrain analysis. Such impacts would render certain parts of the WSAs incompatible with the Congressional definition of "wilderness," to wit:

"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is...untrammeled by man...land retaining its primeval character..without permanent improvements...with the imprint of man's work substantially unnoticeable...[with] outstanding opportunities for solitude..." (from the National Wilderness Act, Section 26, 16 U.S.C 1131, 1964) (emphasis added).

The Upper Sonoran Final Wilderness Environmental Impact Statement (FEIS) (USBLM-Arizona, 1987) did not consider nor address any activities outside of the WSA boundary lines when evaluating the suitability of the WSAs for designation as wilderness. Considering the extent of man-made developments in and adjacent to the Burro Creek WSAs, this is a serious deficiency of the FEIS, as is illustrated by this study.

COMPUTER MODEL

A computer model of the Upper and Lower Burro Creek WSAs was constructed to help visualize the relationships of infrastructure elements to the WSAs and surrounding geographic features. First, a computer topographic (terrain) model of the area encompassing the two WSAs was produced (**Figure 1**). The WSAs, town of Bagdad, and Cyprus Copper Company operations were then added to the terrain model (**Figure 2**). Finally, all of the infrastructure elements (roads, powerlines, pipelines) in the area were added (**Figure 3**).

Figure 4 shows the computer model simulation of the view from 40° above the horizon looking south across the Upper Burro Creek WSA toward Cyprus Copper Company's Bagdad Copper Mine. The figure shows the WSA boundary and the locations of **Figures 5 through 8**, which are actual views that would be seen by a person within the WSA.

Using the terrain model and field verification, "visual impact zones" were delineated. These are areas from which a person within the WSA would be within site (and/or sound) of man's improvements and mechanized activities and thus, by definition, not in a wilderness. **Figure 9** shows the visual impact zones in Upper Burro Creek WSA, and **Figure 10** (location and direction of view shown on Figure 9) further illustrates these impacts from the WSA visitor's perspective. **Figure 11** shows the visual impact zones for both WSAs. **Figures 12 and 13** illustrate actual visual impacts in part of the Lower Burro Creek WSA; the locations of these views are shown on Figure 11.

EIS DEFICIENCIES

Additional issues not addressed by the Upper Sonoran FEIS include possible air quality, water quality, or water rights impacts to surrounding lands that may result from wilderness designation. In particular, the potential impacts to future use and development of approximately 134,000 acres of state lands (**Figure 14**) upstream from the Lower Burro Creek WSA and within the Burro Creek drainage basin are not considered, nor are impacts to the Cyprus Copper Company operations adjacent to the two WSAs.

CONCLUSIONS

Consideration of the Upper and Lower Burro Creek WSAs for wilderness designation is based on a deficient environmental impact statement that disregards the following impacts:

1. Obvious visual and noise impacts from within and without the WSA boundaries that are clearly not compatible with the Congressional definition of a wilderness
2. Water rights impacts to the development of surrounding lands including 134,000 acres of state land and the Cyprus Copper Company's ongoing mining operations
3. Economic consequences of negative impacts to surrounding lands, and commercial activities.

In light of these deficiencies, the advisability of including even the small parcels of suitable land in the national wilderness inventory based on the current FEIS is highly questionable.

RECOMMENDATION

In light of the deficiencies in the Upper Sonoran FEIS, as discussed above, we recommend further and full consideration of the air quality, water quality, water rights, and economic impact issues on lands surrounding the WSAs prior to any further Congressional consideration of the areas for wilderness designation.

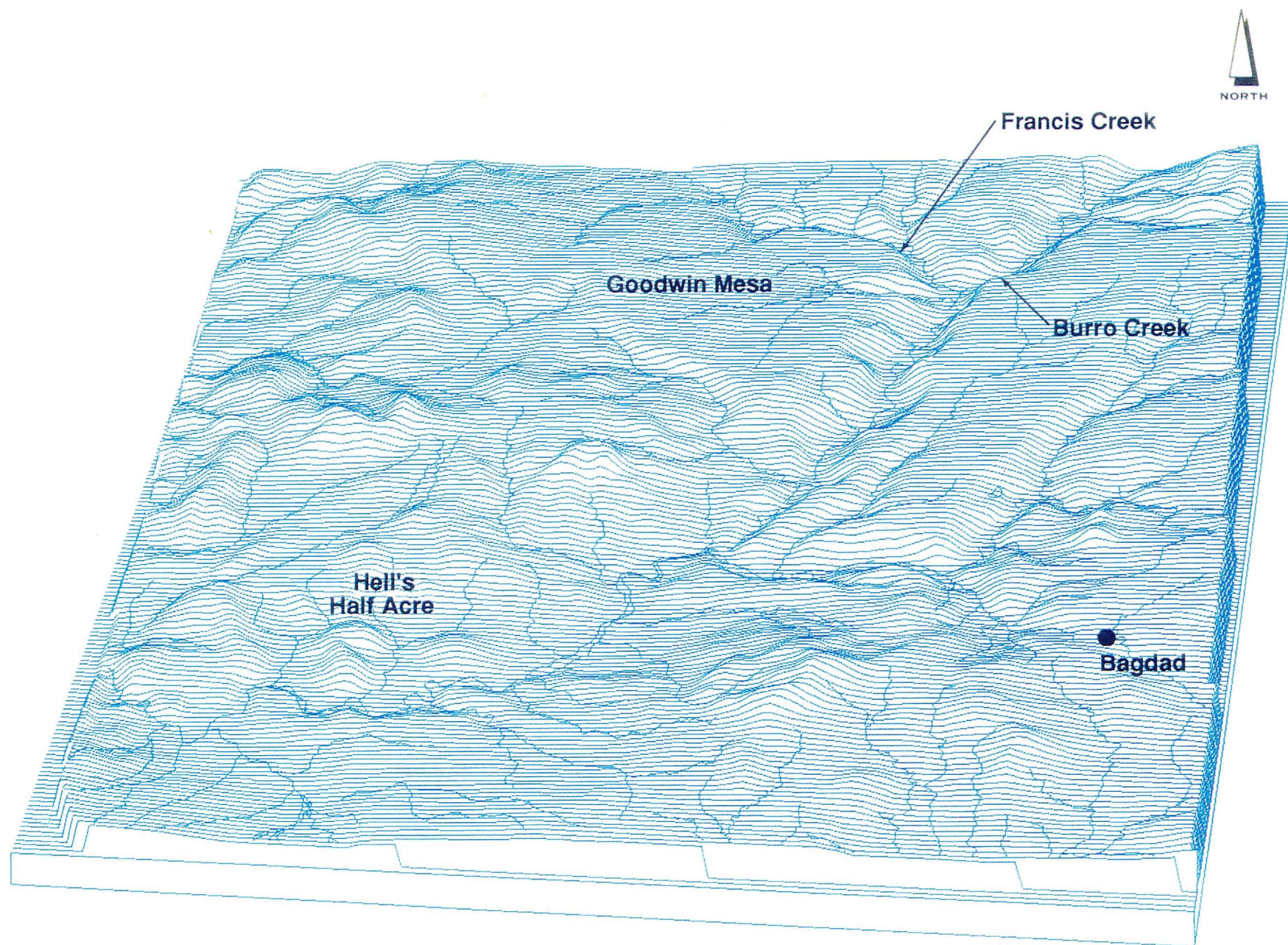


Figure 1

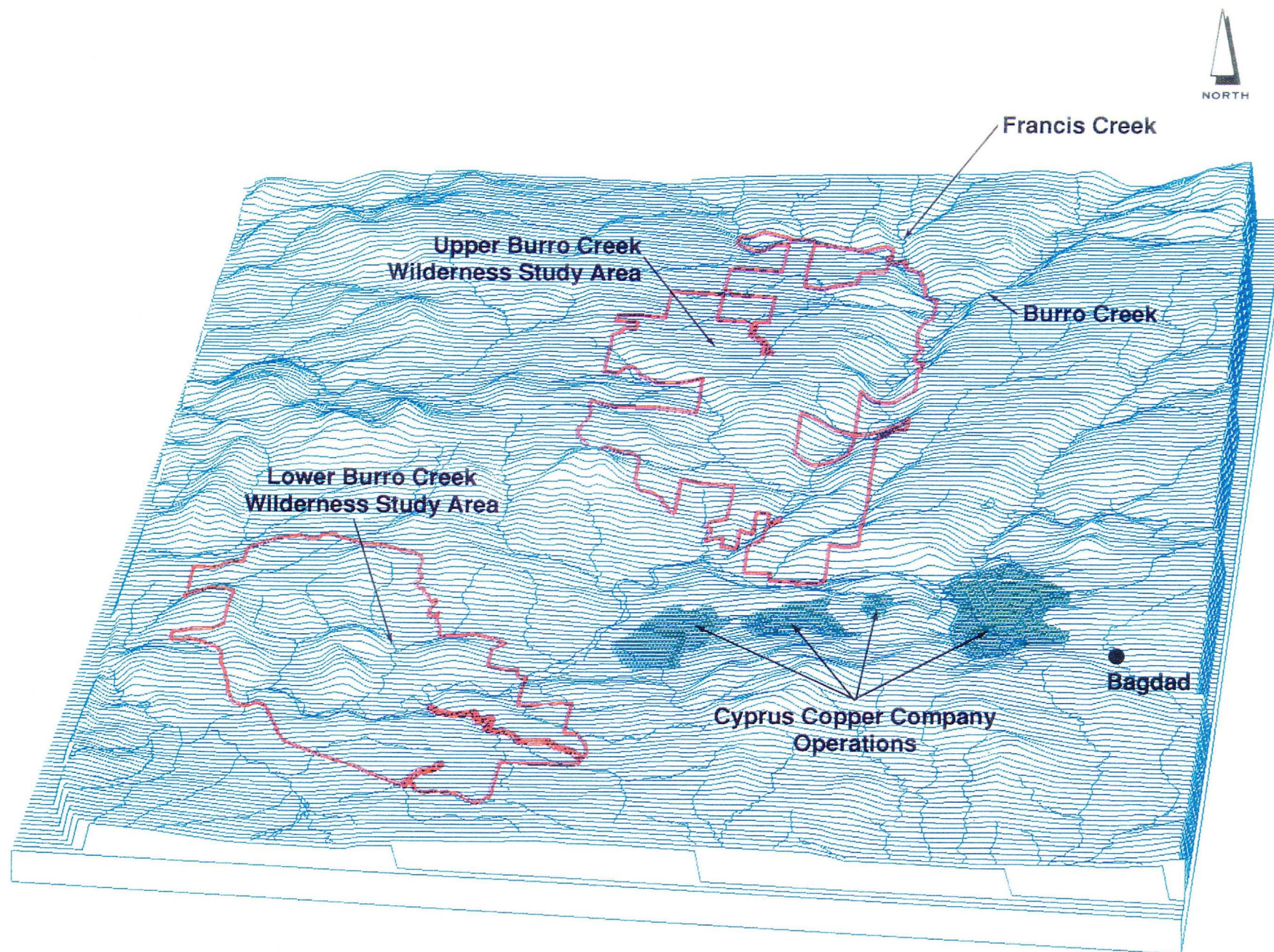


Figure 2

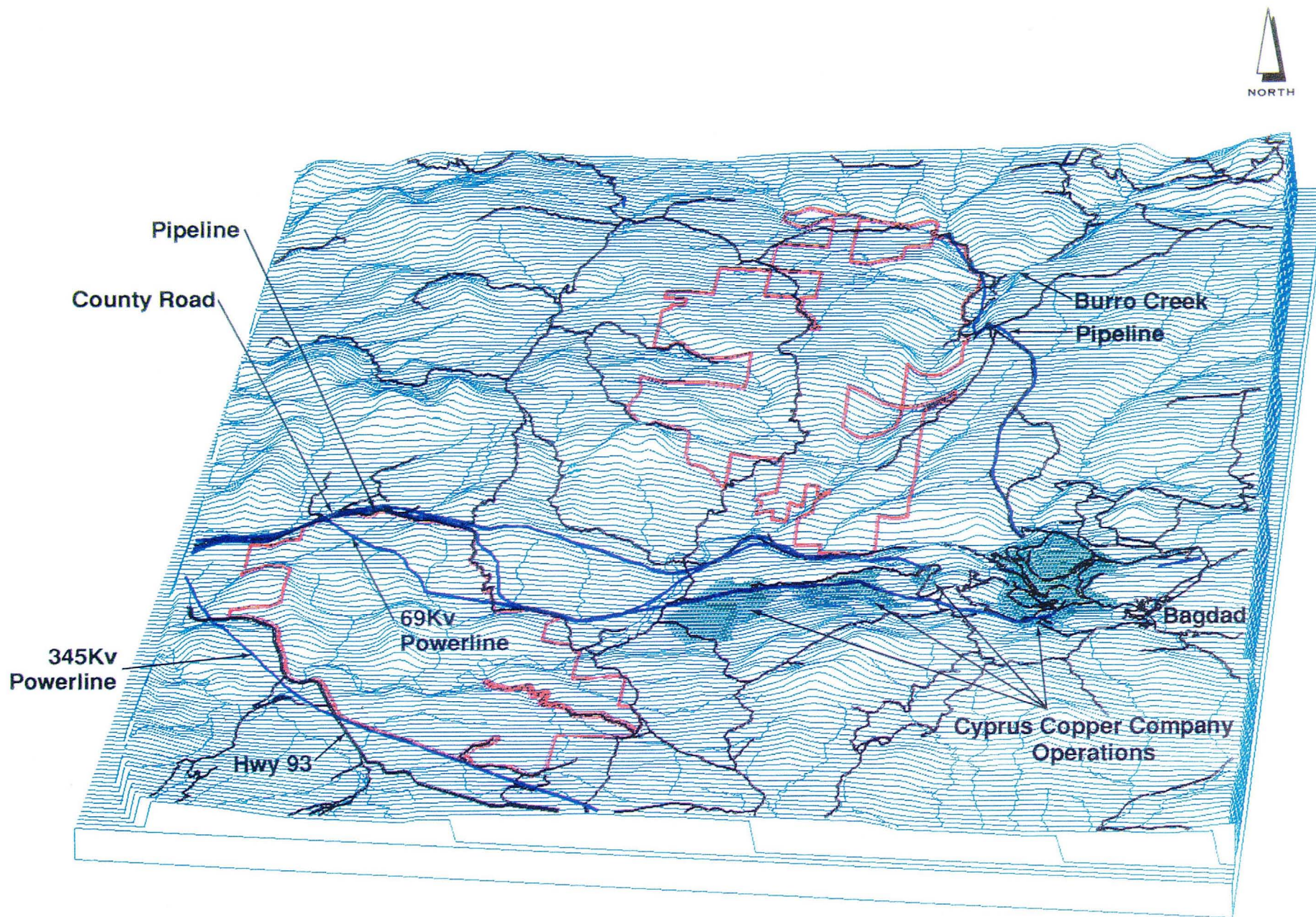


Figure 3

View South From Upper Burro Creek WSA

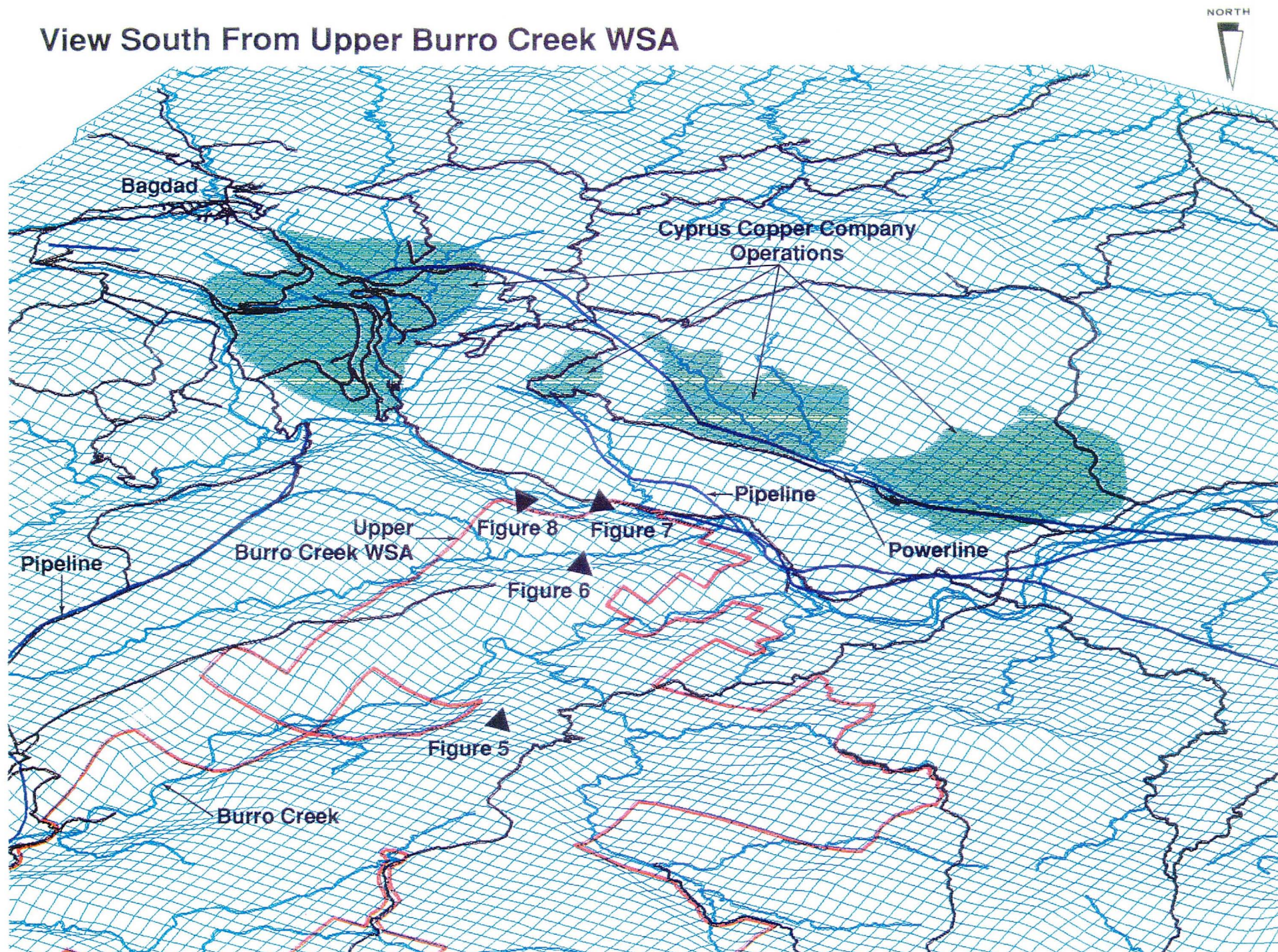
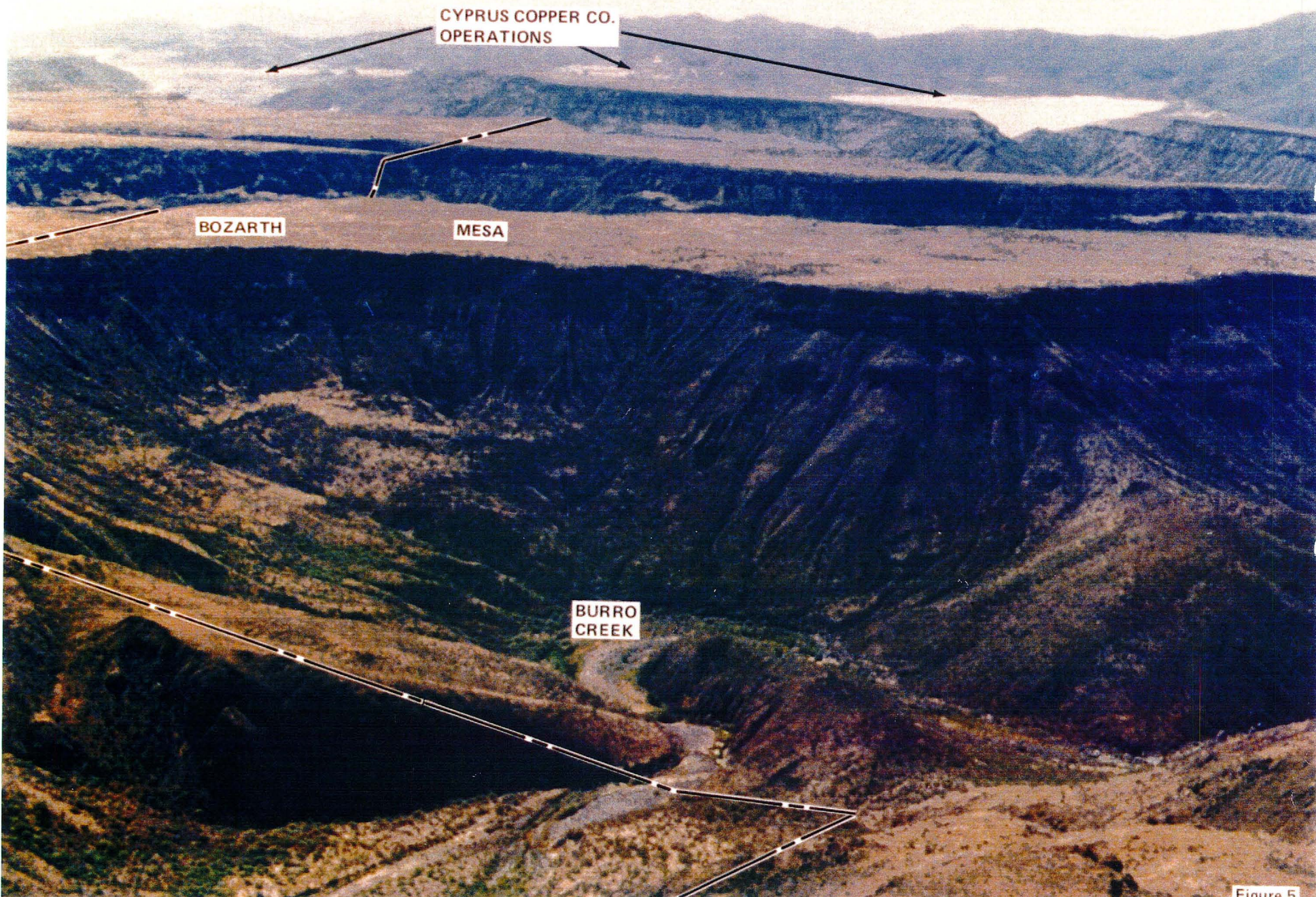


Figure 4

VIEW SOUTH FROM GOODWIN MESA
UPPER BURRO CREEK WSA



VIEW SOUTH FROM BOZARTH MESA
UPPER BURRO CREEK WSA



Figure 6

VIEW SOUTH FROM SOUTHERN MESA
UPPER BURRO CREEK WSA



Figure 7

VIEW SOUTHEAST FROM SOUTHERN MESA
UPPER BURRO CREEK WSA

CYPRESS COPPER CO.

MINE

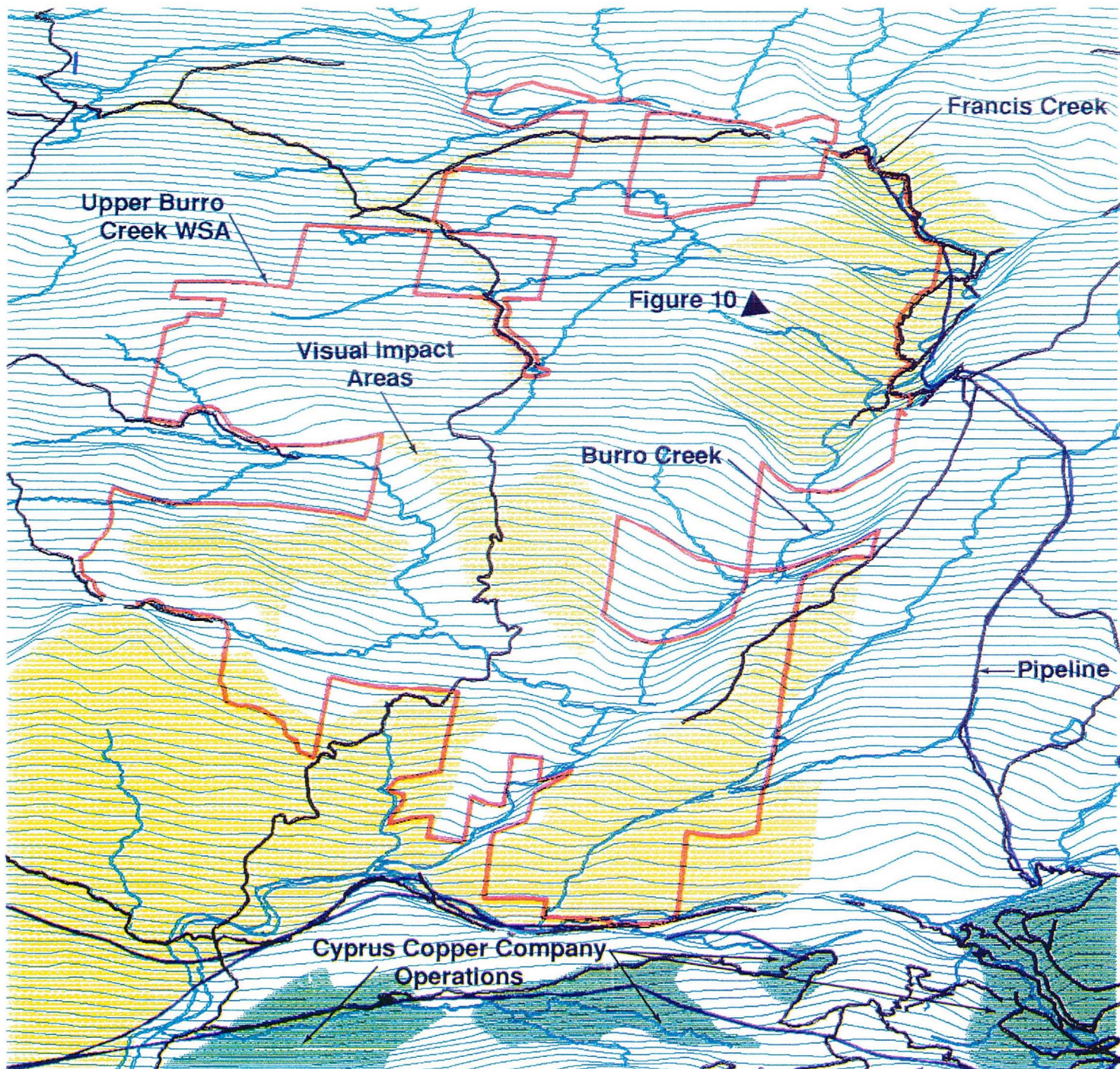
MINE DUMPS

PIPELINE

WSA BOUNDARY

Figure 8





**View North at
Upper Burro Creek
WSA**

VIEW EAST FROM GOODWIN MESA
UPPER BURRO CREEK WSA

BOZARTH

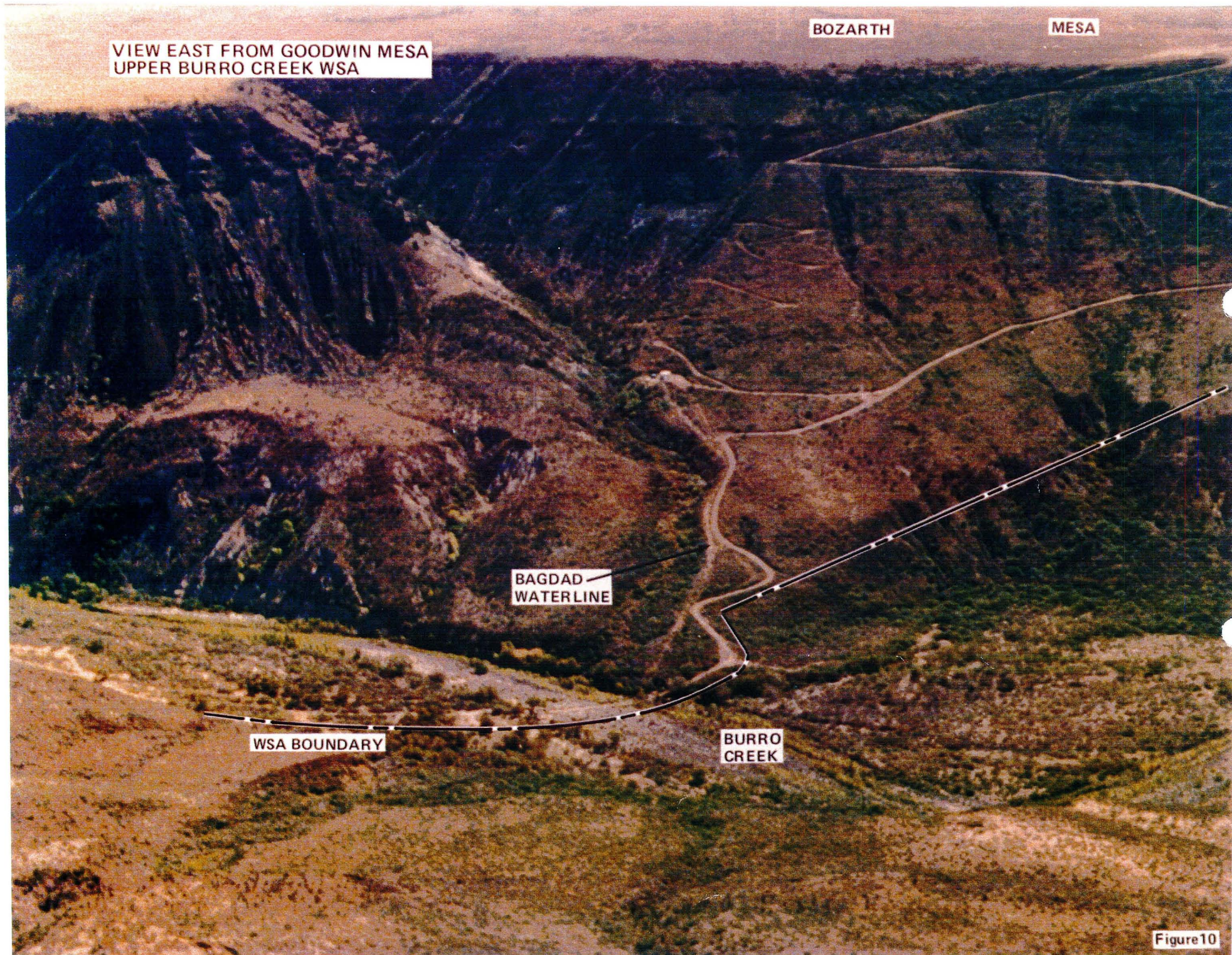
MESA

BAGDAD
WATERLINE

WSA BOUNDARY

BURRO
CREEK

Figure10



View Looking North Showing Visual Impact Areas (Yellow)

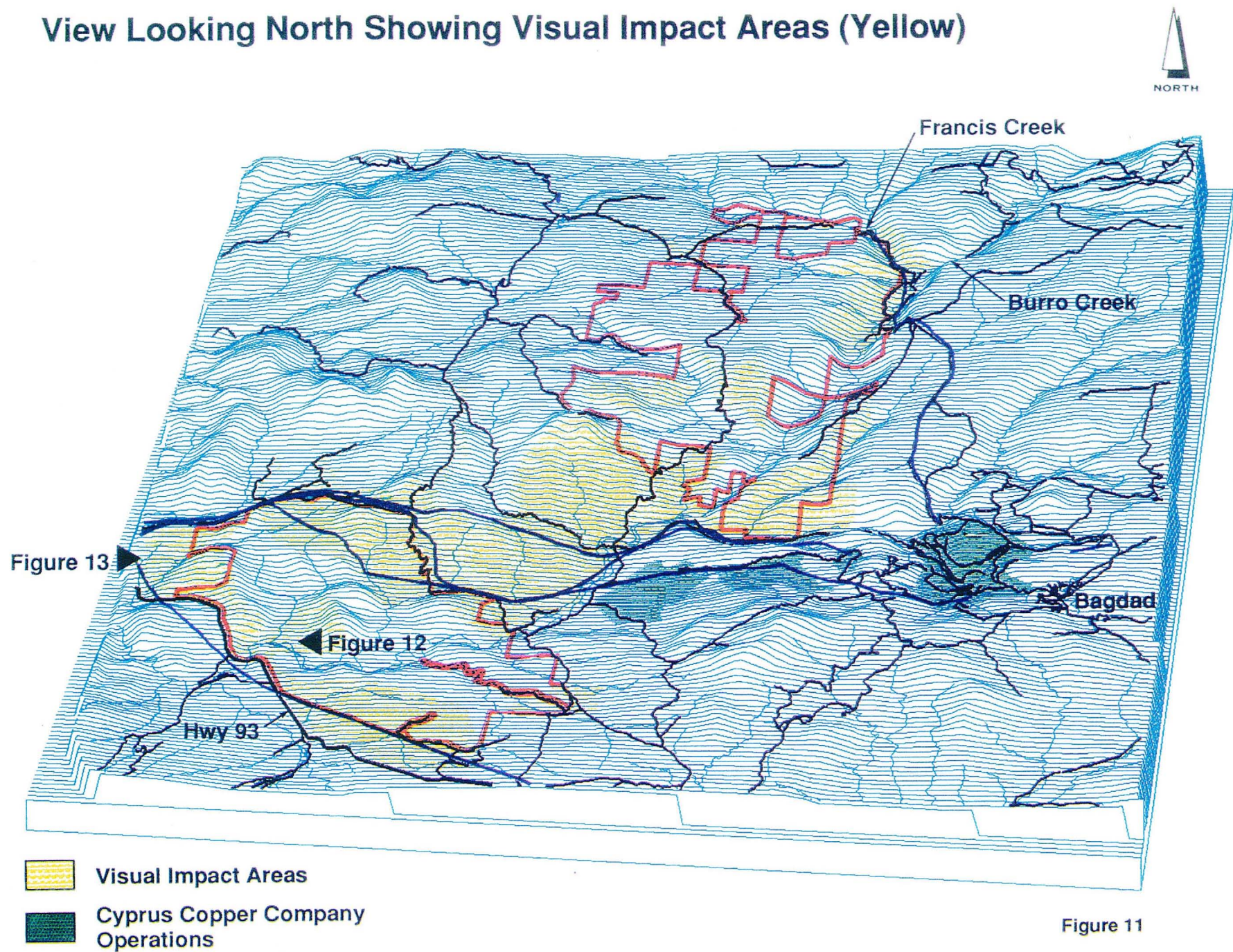


Figure 11

VIEW WEST FROM LOWER BURRO CREEK WSA



Figure 12

VIEW EAST ACROSS THE LOWER BURRO CREEK WSA



Figure 13

State Owned Lands in the Vicinity of Burro Creek

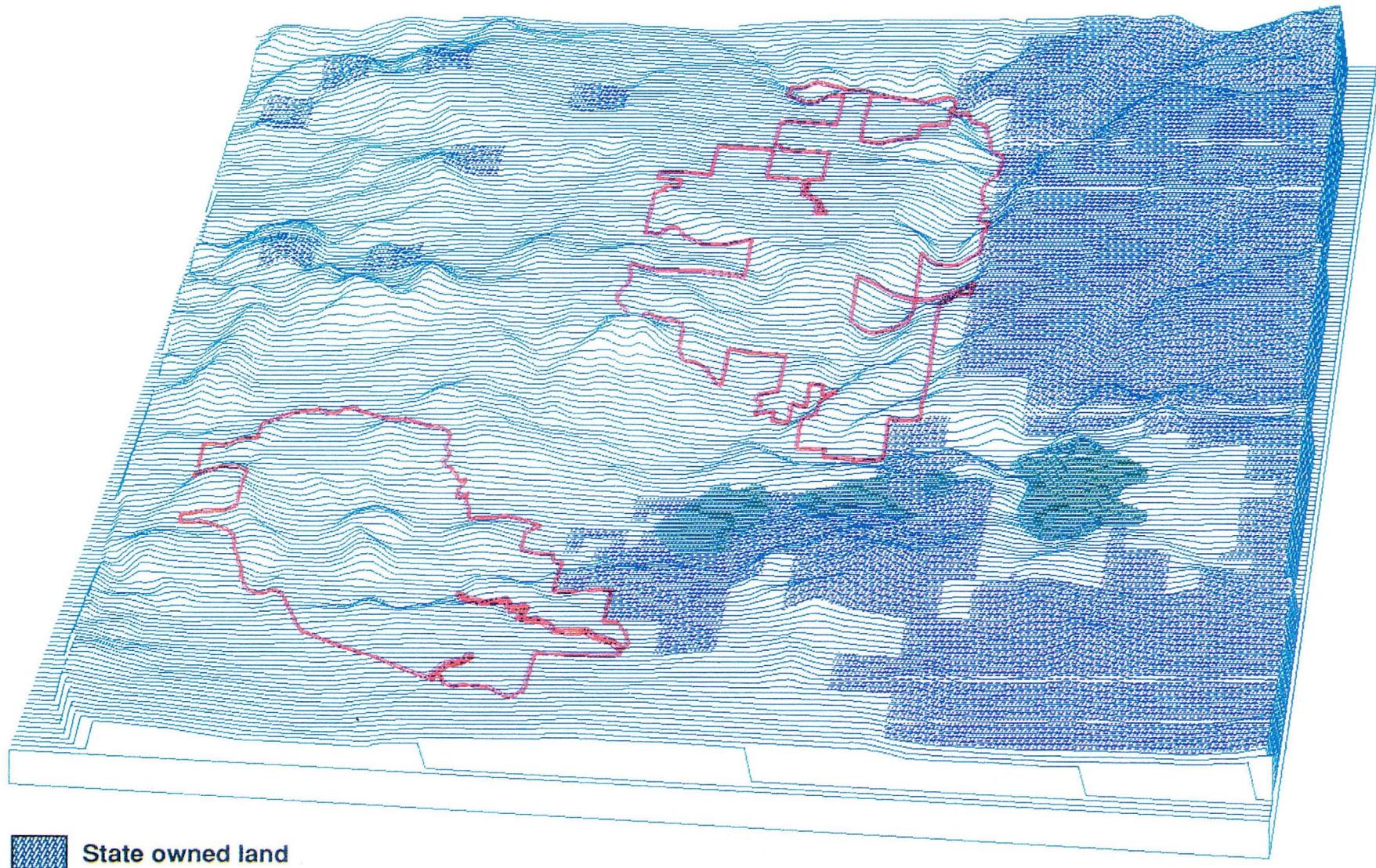


Figure 14