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ARIZONA DEPARTMENT OF MINES AND MINERAL RESOURCES AZMILS DATA

PRIMARY NAME: MAD DOG CLAIMS

ALTERNATE NAMES:

COPPER CAMP CREEK
COPPER CLIFF

MARICOPA COUNTY MILS NUMBER: 613

LOCATION: TOWNSHIP 7 N RANGE 8 E SECTION 8 QUARTER C
LATITUDE: N 33DEG 57MIN 57SEC LONGITUDE: W 111DEG 33MIN 35SEC
TOPO MAP NAME: LION MOUNTAIN - 7.5 MIN

CURRENT STATUS: DEVEL DEPOSIT

COMMODITY:

COPPER OXIDE

BIBLIOGRAPHY:

ADMMR MAD DOG CLAIMS FILE
TONTO NAT'L FOREST FINAL EIS-A MINERAL EXPLOR
PROPOSAL IN THE MAZATZAL WILDERNESS 9/6/1973

COPIER CAMP CREEK PROSPECT-MAD CLAIMS

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ENCLOSURES

TWO MINING ENGINEERS REPORTS ON THE "MAD CLAIMS"
THIRTEEN COLOR PHOTOGRAPHS OF THE CLAIMS
PORTION OF LION MOUNTAIN QUADRANGLE MAP WITH CLAIMS MARKED

INTRODUCTION

Mr. Robert B. "Ted" Rodney of Mesa, Arizona is an 82 year resident of Arizona arriving here at the age of two years. Mr. Rodney has been active in cattle ranching, mining, farming, transportation and other industries that have contributed to the spectacular growth of this state. The great copper camps were being discovered and developed during Mr. Rodney's youth and influenced him to become involved in the search for economic ore deposits. Mr. Rodney now holds thousands of acres of patented and unpatented mining claims primarily in Pinal and Maricopa counties.

Mr. Rodney has decided, because of age, to dispose of some of his mineral claims. I, Donald L. Deming of Mesa, Arizona have been offered a full 25% ownership of any and all mining properties which are sold thru my efforts.

The information contained in this presentation has been compiled from extensive but scattered records mostly in Mr. Rodney's possession. Some of the information is presented as told to me by Mr. Rodney. Some inferences have been made on known economic conditions that prevailed during the wild history of copper mining in Arizona. When all of this information is plotted with mining engineers opinions and trained geologists reports a clear picture of a missed bonanza emerges.

The entire history of Arizona mining is filled with stories of missed opportunities. Those individuals and companies with faith and foresight who had the courage to develop both mines and methods in almost inaccessible areas are now the industrial giants in the country. Arizona is coppers child. We feel that the claims being presented are a true bonanza and will become a great mine valued in the hundreds of millions of dollars. Development problems, in retrospect, are minimal.

Copper Camp Creek Prospect - Mad Claims

The Copper Camp Creek Prospect consists of 22 unpatented contiguous lode mining claims called the "Mad Claims" situated in Sections 7 and 8, Range 8 East, and Township 7 North in Maricopa County, Arizona. These claims were filed on and validated by Mr. R. B. Rodney of 265 W. 1st St., Mesa, Arizona. The claims are on record in Maricopa County, Mad Claims 1-22, Docket 8433, pages 673-694 inclusive. The claims are located in the Lion Mountain Quadrangle and are less than two miles inside the Mazatzal Wilderness Area.

Work performed on these claims dates back to the 1890's and consists of surface exploration, geologic examination, geochemical analysis of rock samples, assays for values, thin section analysis, shallow core drilling and shaft and development work. Aerial radiation surveys and follow up on the ground surveys indicate the presence of uranium ore on the property also.

The work has been performed by a large English Company which first discovered the property in the 1800's and competent modern mining engineers and geologists. In the interim between the English companies work and the very recent work the property was developed by a Mr. Bill Winslow who did considerable shaft and development to a depth of 170 feet. Following the development work performed by Winslow, Mr. Rodney has continued development which has resulted in more than

17,000 tons of ore hoisted and ready for processing.

Although the Mad Claims are only 50 miles North East of Phoenix, Arizona, they have been virtually inaccessible until modern times. Today via helicopter the claims are only minutes away from a large modern city. The claims may also be reached by driving to the Southeast of Horseshoe Dam and packing or hiking seven miles, two of which are thru a wilderness area.

Mad Claims-Area Geological Features.

The Mad Claims mineralization is associated with a felsic rhyolite intrusion into a portion of the precambrian pinal-yavapai schist. The rhyolite has in turn been invaded by an andesite dike. The zone of alteration appears to cover an area of 2,000 by 8,000 feet, and appears to extend under some flat lying, recent volcanics to the northwest. The dip of the contact of the rhyolite schist on the southeast, and a brecciated portion of the rhyolite on the northwest, indicates the intrusive mass increases in width and depth. Isolated islands of schist are found surrounded in some portions of the rhyolite.

Substantial copper oxides are present on the surface. Dump material from the workings also show appreciable oxides. Rock brought to the surface from one of the shafts is highly silicified and has a monozonite porphyry texture. Investigation of surface features and underground mineralization show an oxide outcrop of 60 foot width by at least a 200 foot depth of unknown length. These oxides run to at least three percent copper with some samples running as high as 28%. The mineralization is primarily copper oxides occurring in a sheet like mass in an andesite host rock, dipping approximately 60 degrees to the southeast.

The surface expression represents a massive sulphide type of occurrence at depth. Minor sulphide casts present in the oxides indicate that the oxides are exotic and have migrated

from below. This type of oxide occurrence is indicative of massive, at depth, sulphide deposits. The presence of porphyry dikes on the surface do not preclude the occurrence of a porphyry copper deposit also. A favorable comparison has been made to the Ranchers Exploration and Development Companies "Big Mike" property in Nevada. This property has been predicted to eclipse the "Big Mike" mine in production. There is enough oxide copper indicated to develop a profitable leaching operation even if a massive sulphide deposit is not found.

Copper Camp Creek Prospect-History 1890-1976

The Copper Camp Creek prospect was first discovered and filed on by an English exploration company in the 1890's. During that period many English stock companies were formed to capitalize on Arizona mineral properties. As far as we know the English were never successful and most of their efforts led to staggering losses. The Copper Camp Creek prospect was a typical example of the English ineptitude in western mine development. At any rate the English gave up and went home during the financial panic of 1920-21.

During the time that the English held the property they did do extensive surface development work and proved the existence of a large oxide ore body. Their old diggings are still visible today and were impressive enough to attract the attention of one Bill Winslow who refiled on the abandoned claims. Mr. Winslow was an area rancher, prospector and miner of some repute who fully intended to make a working mine out of the prospect.

Then, as now, a successful development program consisted of a desirable property, talent, and capital. Mr. Winslow had the property and talent but was sadly lacking capital. He appealed to his old friend Ted Rodney to finance a development program for an interest in the mine. Mr. Rodney agreed and the Copper Cliff Mine was in operation. Several shipments of selected ore were packed out and shipped to an

English smelter at Brighamton. Shafts were sunk to a depth of one hundred feet and still no end of ore was in sight. The future looked rosy until the depression of the thirties took its toll of the copper industry. After the depression the second world war interfered with further development. With Winslow's death in 1938 the required talent to develop the property was missing and Mr. Rodney had more pressing business commitments to contend with. The first 54 years of this prospect, from 1890 to 1944, were marred by unforeseen circumstances which prevented development.

During the Forties the atomic bomb was being developed and a quiet search was being conducted for sources of pitchblende by the major world powers. At that time the only known mines were in Africa. A search of smelter records turned up the receipt, in the twenties, of a few chunks of pitchblende from an Arizona miner named Winslow. The smelter sent a geologist by the name of Walker to this country to trace down the source of the uranium ore. Mr. Walker arrived before the first bomb was dropped in 1945. Finding Winslow had died the geologist looked up Mr. Rodney and asked to be guided to a Lime Creek location in the Mazatzal mountains.

Mr. Rodney was shown one of the pieces of pitchblende that Winslow had shipped to England. Although Rodney argued that Winslow had worked only the Lamb Creek site the geologist insisted on the Lime Creek trip. The trip by horses and pack

animals was subsequently made but no ore was found at the Lime Creek location. The geologist returned to the Phoenix area with Mr. Rodney and took samples from a number of Arizona hot springs, shipping the water back to England. He told Mr. Rodney that he was looking for the mineral that heated the water. The English geologist remained in Arizona until he was overcome by heat prostration in the Gila Bend area later that same year. After the English geologist's death Mr. Rodney heard no more about the matter.

An interesting sidelight to the story is that Mr. Rodney was able to get in on the New Mexico uranium boom of the fifties at an early date and was one of the few who made a substantial amount of money out of the boom. Mr. Rodney, thanks to the English, knew the value of uranium before the boom and acquired some uranium property in advance.

Mr. Rodney maintained the claims under the Winslow name until 1970 when he and a consulting engineer by the name of M. F. Dibble formally refiled under their own names in December of 1970. Mr. Dibble was convinced of the value of the property and spent a considerable amount of time on the ground performing survey work. The area had been examined by a Forest Service Mineral Examiner in 1967.

For the second time the three conditions for mine development were met. Mr. Dibble had replaced the deceased Mr. Winslow and had the expertise required for property development. Mr.

Rodney continued to supply capital. Now, however, a new specter had risen that the old timers could not have even guessed at: The U.S. Forest Service. The Forest Service blocked every early attempt of the claim holders to perform assessment work on the Mad Claims.

At first the Forest Service simply dragged their feet on granting permission for operating back pack core drills in the area thinking that Mr. Rodney would just give up and go away. When Mr. Rodney and Mr. Dibble persisted by supplying the Forest Service with environmental impact statements, complete plans for exploration work, and anything else demanded, the Forest Service included the claims area in the wilderness area. Surely Mr. Rodney would give up and go away now. Little did they know. Not only did Mr. Rodney continue to demand access to his property but he even optioned the property to a foreign company for a substantial amount of money. The contract stipulated that a road be built to the claims within a two year period or the contract would be void.

Now the Forest Service had something to get their teeth into. If they could delay the exploration required to prove the existence of a massive ore body for only two years the justification for road construction would also be delayed, voiding an existing contract. No one, they reasoned, would continue to pursue mine development under these conditions. Again the Forest Service underestimated their adversary. The Rodney-

Forest Service battle began in earnest in 1971 and was won by Mr. Rodney in 1974.

For Mr. Dibble the victory came too late. He had been offered a lucrative engineering position in Peru which he accepted, relinquishing all interest in the Mad property. For Mr. Rodney the victory came only after the contract he had negotiated for the sale of the claims had expired. The Forest Service had won a minor skirmish but in so doing have used all of their ammunition. This valuable keystone property may now be developed.

Although the Forest Service consented to an exploration program in mid 74 they did not know that the program had already been completed. In 1973 Mr. Rodney hired a driller and drilled three 400 foot holes with a diamond core rig which was packed into the claims area. The special use permits which the Forest Service finally agreed to issue have never been issued and are still available to any company that options the property.

The last 32 years comprise the second half of the Copper Camp Creek history. The first 54 years saw the discovery of the ore body and subsequent development of the mine. The early years were plagued by transportation and communications problems along with economic instabilities and personal problems. The second half of the areas 86 year history is highlighted by the discovery of uranium on the property, the modern

geologic study of the area and definition of a large ore body on the Claims. Perhaps most important is the apparent waning of the awesome misdirected power of the Forest Service during the last few years of this period.

The last chapter of this historical sketch may very well be written in advance. The history of Copper Camp Creek closely parallels the history of other copper mines thruout the west. An enterprising company will either lease or purchase the claims and perform the required exploration to define the massive sulphide deposit. The oxide cap will be stripped away and leached utilizing the Anaconda ammoniacal process or its successor exposing the sulphide ore for normal smelting or leaching.

About the time the mine and mill go on line a great new need for copper will be generated by the introduction of the electrically driven automobile engine or some other technical advance. Fears of overcapacity in the copper industry will be replaced by fears of shortage spurring a new hunt for ore. The same story has been told over and over again thruout the history of modern copper mining.

Then following an ever increasing tonnage production the mine will play out. Ore will be leaner and leaner until there is no more and the land will return to a quiet sleep allowing nature to heal the scars.

Copper Camp Creek Prospect-Mad Claims-Conclusions

Thruout this presentation the Mad Claims have been referred to as a copper prospect. They are a prospect only because their full potential has not been professionally determined thru a well planned exploration program. These claims are a right now copper mine with a very conservative 17,000 tons of 5% or better ore on the ground ready to process. The known ore body is 60 feet wide, 200 feet deep and long enough to be unknown. Existing shafts are 170 feet deep and still in oxide ore. A drift of 165 feet thru ore terminates in a stopped chamber of 70 feet square by 25 feet high. All of the ore removed is still at the mine awaiting a shipping road or an on site mill.

Other shafts and cross cuts on the claims indicate an ore body that will gross over \$30,000,000.00 in leachable ore alone. The geology of the area is typical of massive sulphide ore body occurrences in other mining areas. The nature of the ore body also indicates a widening of the body at depth. None of this is wishful thinking but absolute fact which may be easily confirmed by an on site inspection.

The Mazatzal Mountains are rich in minerals. We know that our claims comprise an economic copper deposit. Other copper deposits also exist in these mountains in the Saddle Mountain and Copper Mountain areas. Besides the copper deposits we know of a gold producing area that could easily be worked at

a good profit if it were not in a wilderness area. These Mad Claims are the keystone in gaining access to the Mazatzal Mountains minerals. As it stands there is no other way to gain access to this area for mineral exploration than by acquiring our Mad Claims which the Forest Service Mineral Examiner admits being mineralized to the point of warranting further exploration.

A Forest Service Mineral Report written by Mineral Examiner Gilbert J. Mathews states: "It is my opinion as a mining engineer, the mineralization exposed on the subject claims (previous party) warrant exploratory drilling to investigate the possible existence of underlying secondary enriched ore." Mr. Mathews examined the area on October 2-3 in 1967.

Pitchblende certainly was found either on the ground or in one of the prospects by the former mine operator because some uranium ore was in a shipment to England. A radiation survey by air was flown and indicated the presence of uranium on the claims and thru the entire Lamb Creek Valley. Subsequent on the ground exploration with a geiger counter confirmed the uranium presence but did not pin point the source of the ore. The ore is either on the claims or is float from higher up. Since the copper showings were enough to warrant Forest Service special use permits, Mr. Rodney elected to keep the presence of uranium quiet until he could pinpoint the source and file claims. Any exploration program planned to define

the limits of the secondary enriched ore body would also find pitchblende if it is in the area. If not in the immediate area short exploratory excursions could be easily made from the Mad Claims site to discover the source. We know it is there.

There has never been a negative report made by any of the experts who have seen the property. Everyone agrees that this very well could be the last great copper mine to be discovered in Arizona. Mitsubshia LTD of Canada thought enough of the property to option it for 22 million on the strength of cursory surface and works examination performed by their own geologists. The photographs included with this presentation were taken by the Japanese. The contract with the Japanese became void when access by road to the claims was not made in two years.

The Copper Camp Creek Prospect Mad Claims is a copper producing area whose time for development has come. Practically all of the preliminary work has been done including the winning of the battle with the Forest Service. It is now time to define the extent of the underlying sulphide deposit and the source of the pitchblende discovered on the property.

Copper Camp Creek Prospect-Mad Claims-Proposal

The economic value of the oxide ore deposit has been estimated by a mining engineer to be in excess of \$30,000,000.00. Jeromes two great mines netted over a half billion dollars from less than fifty acres. There are similarities between this property and that of Jerome. We are convinced that to sell our Mad Claims outright would be a mistake. The contract with the Japanese for a total purchase price of 22 million is no longer of interest to us and will not be renegotiated.

We are also convinced of the presence of uranium on our property. We anticipate a greater return from uranium mining than from copper mining. We would be most interested in leasing this ground on a cash royalty basis.

We would expect to be paid a fair market price for the ore already mined and ready for processing. We further expect to be reimbursed for some of the money expended for exploration and development work. We would also expect to receive a minimum lease payment each year plus a royalty on all minerals removed as a result of our work to open the area to exploitation whether the minerals are discovered on our claims or not.

Preliminary work with a calculator indicates the rough dollar amounts expected are as follows: The initial cash payment required will be 2½ million dollars, annual lease payments

will be \$150,000.00 whether or not mining is done, and royalty payments will be 12% of values determined at the mill or smelter. Royalties will be paid in addition to lease payments. Should we come to an agreement along these lines drill time will be made available for a minimum amount providing we are informed of all results.

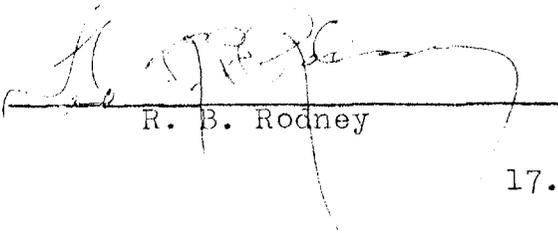
In all cases our interests must be protected and be clearly written in a formal lease agreement. Should these terms not be satisfactory, please feel free to make reasonable counter-offers.

All agreements are to specifically state percentage ownership by Mr. Rodney and Mr. Deming. Mr. Rodney is in possession of 75% of the property and Mr. Deming 25%. All payments made are to be in the same ratio to the two parties at their separate mailing addresses. Those addresses are:

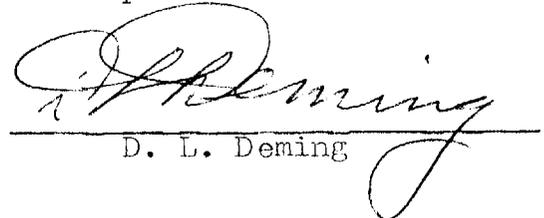
Mr. R. B. Rodney
265 W. 1st Street
Mesa, Arizona 85201
Tel. 964-3677

Mr. D. L. Deming
8209 E. 3rd Avenue
Mesa, Arizona 85208
Tel. 986-9367

To the best of my knowledge the material and information contained in this presentation is truthful and accurate. This is an offer to lease mining claims in the Mazatzal Mountains to a company for purposes of mineral development.



R. B. Rodney



D. L. Deming

M. F. DIBBLE, P. E. (112)
CONSULTING MINERALS ENGINEER

8537 EAST SAN MIGUEL

602-945-6023

SCOTTSDALE, ARIZONA 85253

February 12, 1973

Copper Camp Creek Prospect- Mad Claims

The Mad group of 22 claims is located in the Nazatzal Wilderness area 50 miles W. W. of Phoenix, Arizona. Mr. R. B. Rodney and I staked these claims in late 1970. The property was originally discovered in the 1890's by an English company who conducted surface exploration work until about 1919. They sank a series of shallow shafts and dug several crosscuts.

The mineralization is associated with a felsic rhyolite intrusion into a portion of the precambrian pinal-yavapai schist. The rhyolite has in turn been intruded by an andesite dike. The zone of alteration appears to cover an area of 2,000 by 8,000 feet, and appears to extend under some flat lying, recent volcanics to the northwest. The dip of the contact of the rhyolite schist on the southeast, and a brecciated portion of the rhyolite on the northwest, indicates the intrusive mass increases in width in depth. Isolated islands of schist are found surrounded in some portions of the rhyolite.

Substantial copper oxides are present on the surface. Dump material from the old workings also show appreciable oxides. Rock brought to the surface from one of the old shafts is highly silicified and has a monzonite porphyry texture.

Although the property is in the wilderness area it has been examined by a forest service mineral examiner in October, 1967. The brief of his recommendations to the forest service is as follows; "It is my opinion, as a Mining Engineer, the mineralization exposed on the subject claims (formerly called Copper Cliff) warrants exploration drilling to investigate the possible existence of underlying secondary enriched ore. Such exploratory drilling can be accomplished with a minimum of soil disturbance".

We have submitted a proposal to the forest service requesting permission to construct a jeep road into the property and to use power equipment for an exploration program. We proposed a program involving geological mapping, geochemical sample taking, and geophysical surveying using induced polarization. A drilling program was also proposed with a minimum of 3,000 feet of drilling in three holes.

We feel that with the above surface indications a well conceived exploration program could possibly lead to economic concentrations of copper ore.

M. F. DIBBLE, P. E.
CONSULTING MINERALS ENGINEER

8537 EAST SAN MIGUEL

602-945-6023

SCOTTSDALE, ARIZONA 85253

June 25, 1973

Mr. R. B. Rodney
265 W. First St.
Mesa, Arizona

Dear Ted:

I recently had the opportunity to spend some time on your wilderness area mining claims, east of Sheep Creek, in the Magazal Mountains. I was able to see more of the area than on any previous trip, plus I was able to go underground, using a flashlight, to see the subsurface expression of the outcrop. A summary of my observations is as follows:

The surface expression represents a massive sulfide type of occurrence at depth. Mineralization observed was primarily copper oxides occurring in a sheet like mass, in a carbonate host rock, dipping approximately 60° to the north east.

There were some sulfide coats observed in the oxides but they were fairly minor, indicating that the oxides were etched (come from somewhere else) and had migrated from below. The oxide concentration was quite substantial with grades

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mining in excess of 3% Copper in places. The cross cut that intercepted the outcrop showed that there was at least 200' of depth, of at least 60' wide, by an unknown length of easily leachable copper ore. It would be a fairly simple task to block out sufficient tonnages of oxide ore to justify a leaching program.

Since the oxides are exotic there is an excellent chance that exploration work at depths should indicate the presence of a massive sulfide copper deposit. The presence of several porphyry dikes on the surface do not preclude the occurrence of a possible porphyry copper deposit also.

The similarities of your property to that of the Big Mike Mine, in Winnemucca, Nev., recently developed by Rancher Exploration and Dev. Co. are significant. The Big Mike produced over 100,000 tons of 10% sulfide copper ore in a 7 month program that netted several million dollars to Ranchers. The lower grade oxides associated with their sulfides are presently being leached. The total dollar volume of the mine will probably approach \$30,000,000. Your property could be substantially larger.

In conclusion, I feel that the surface and underground evidence is conclusive enough to warrant an exploration program. Even if no large sulfide ore body were found there is enough oxide copper indicated to develop a profitable leaching operation.

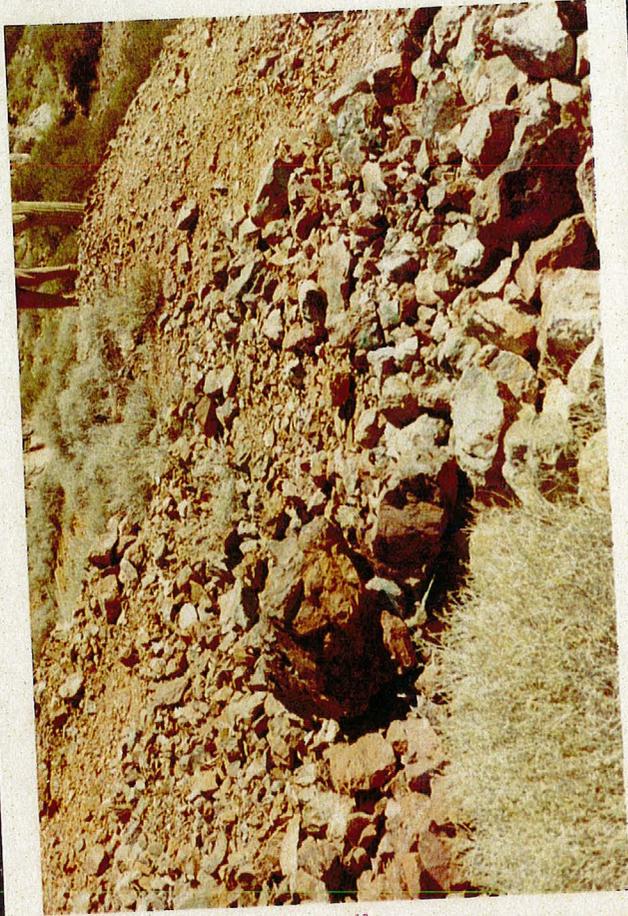
Sincerely yours.

Mike Dillie

COMPELL - MAD ... - M ... ZAL MTE



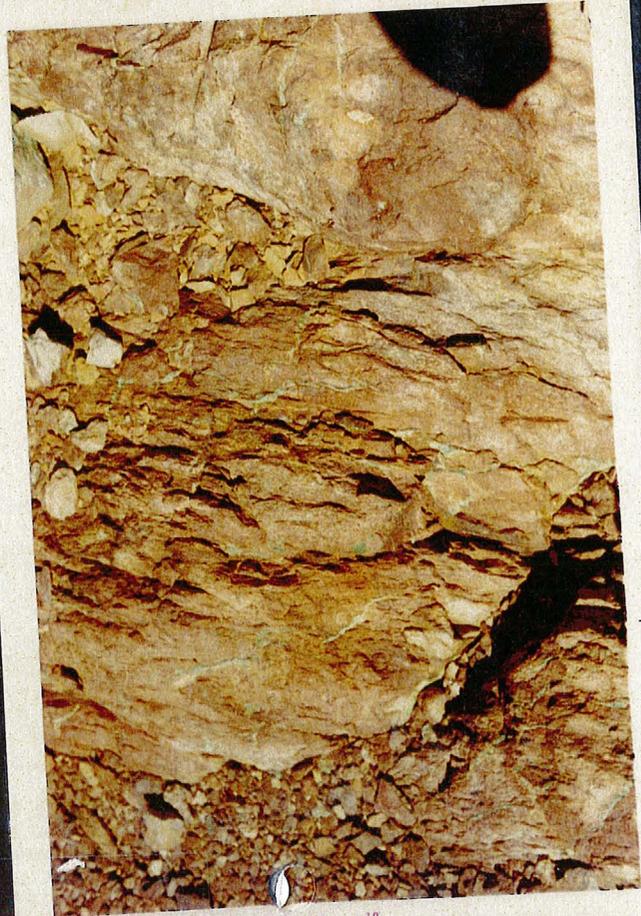
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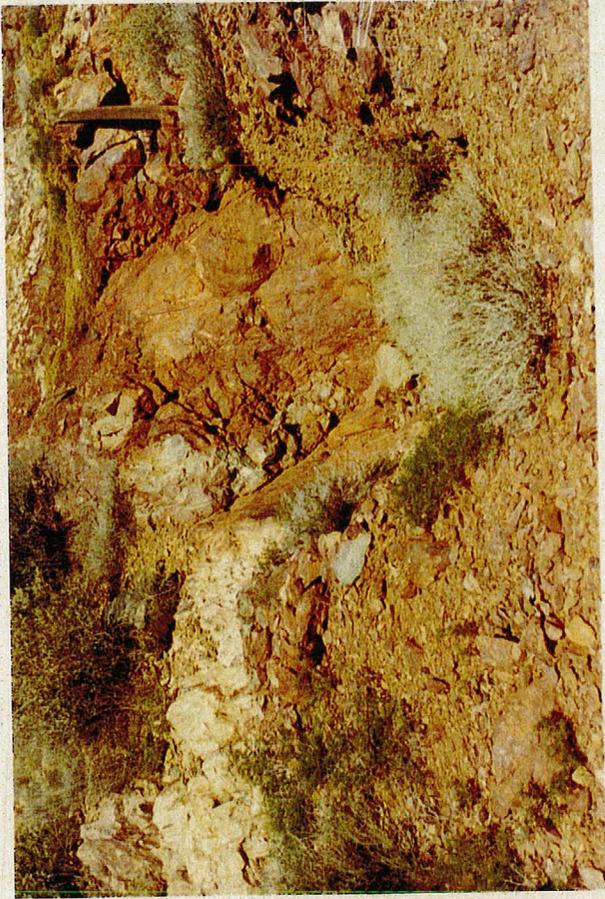
• SEP • 70



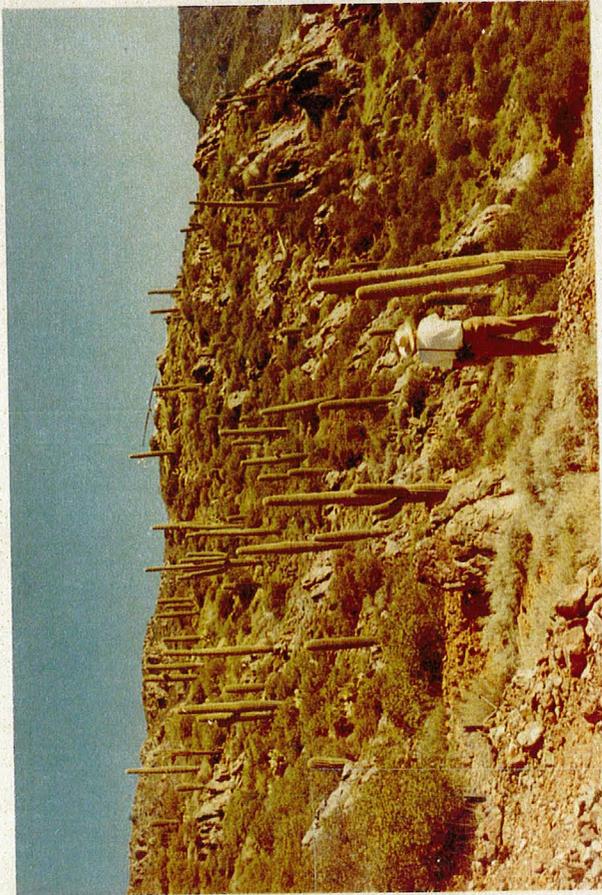
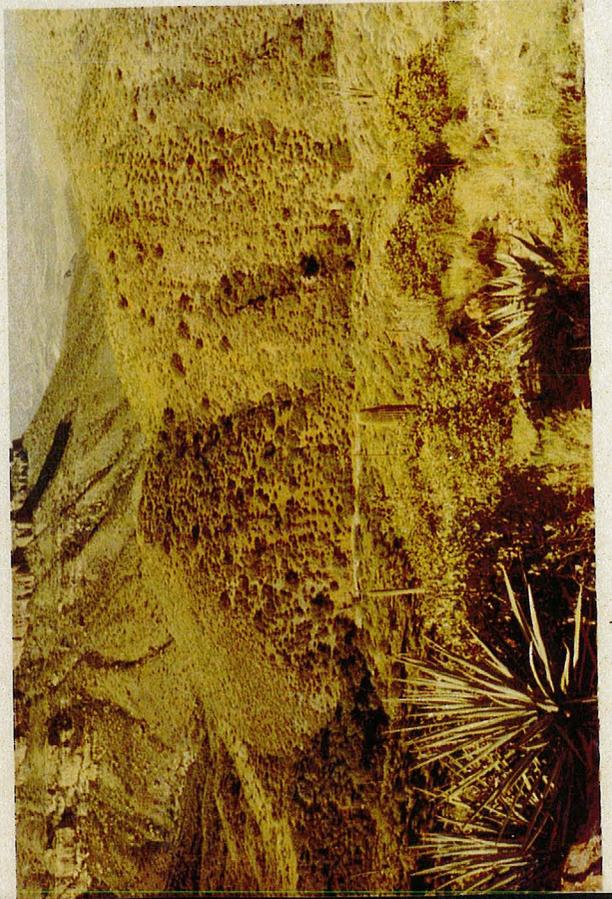
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• SEP • 70



• SFP • 70



• SFP • 70



• SFP • 70

M. F. DIBBLE, P. E. (Peima)
CONSULTING MINERALS ENGINEER

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CONSULTING MINERALS ENGINEER

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602-945-6023

SCOTTSDALE, ARIZONA 85253

Notes---Mineral Examiner Report - Mazatzal Wilderness Area

Examination date: October 2, & 3, 1967.

Date of report: March 1, 1968

Examiner: Gilbert J. Mathews --- Approved E. A. Tragitt,
Chief Mineral Examiner.

Category: Mazatzal Wilderness Area

Claim Names: Copper Cliff 1 - 17 - LMC's

Geographic Location: Section 7, & 8, R 8 E, T 7 N. Maricopa
county, Arizona.

Report on File: Cave Creek Ranger Station.

Brief of Examiner's Conclusions: " It is my opinion, as a
Mining Engineer, the mineralization exposed on the subject
claims warrents exploratory drilling to investigate the
possible existence of underlying secondary enriched ore.
Such exploratory drilling can be accomplished with a
mininum of soil disturbance."

DIBBLE & RODNEY MINING CLAIMS

MAZATZAL WILDERNESS
BOUNDARY

Cypress
5,200

Ridge

BLOCK OF
CLAIMS

DRILL HOLE #3
1000 FT. VERTICAL

SPRING #1

SPRING #2

EXISTING
HORSE TRAIL

ANDERSON
CABIN

SPRING #4

POTENTIAL SUPPORT
CAMP & HELIPORT

JEEP TRAIL

SPRING #3

DRILL HOLE #2
1000 FT. 45°

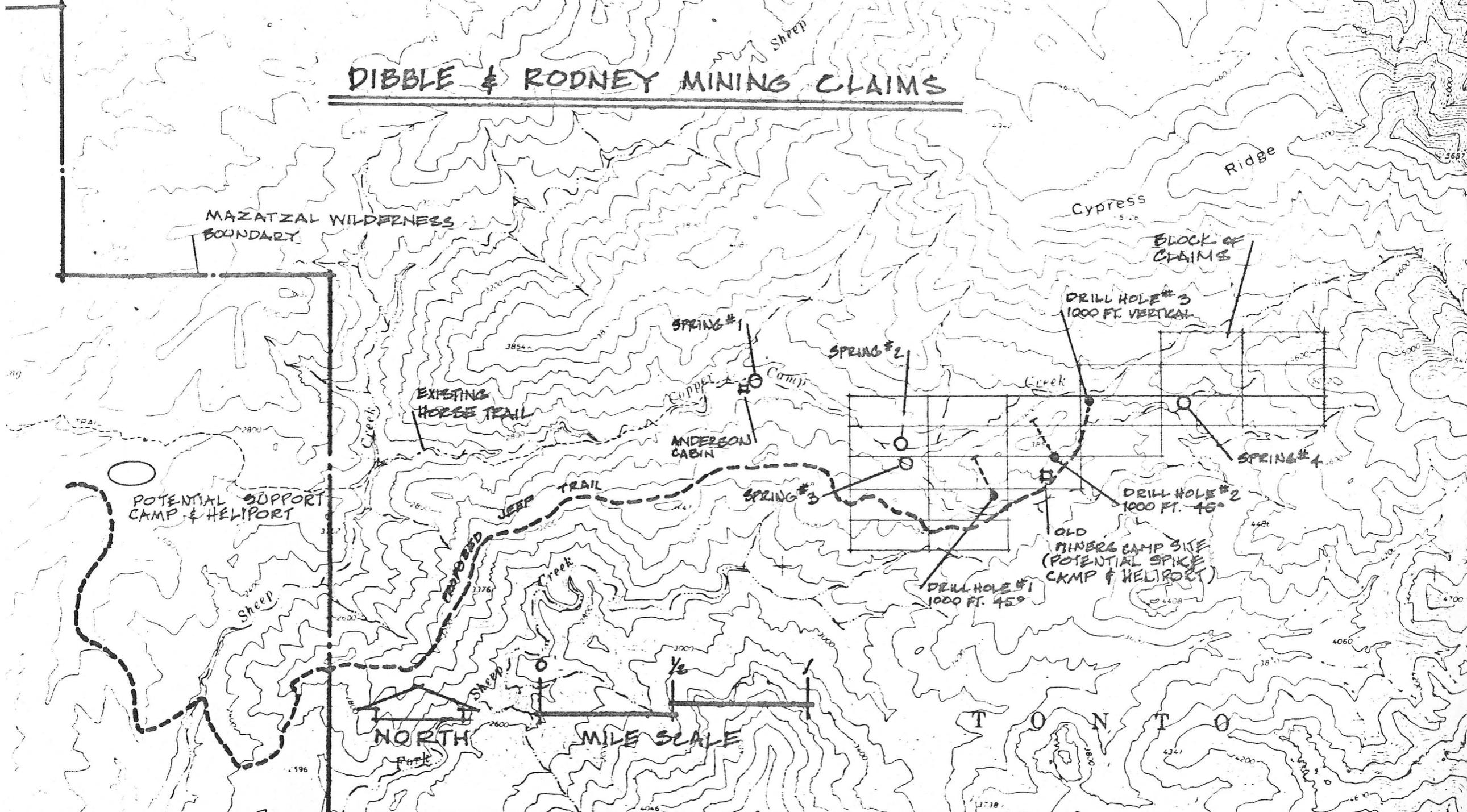
OLD MINERS
CAMP SITE
(POTENTIAL SPIKE
CAMP & HELIPORT)

DRILL HOLE #1
1000 FT. 45°

NORTH

MILE SCALE

T O N T O



Mr. Eising

K

*MAD DOG CLAIMS
(file) MARICOPA Co.*

**F
I
N
A
L**

**Environmental
Statement**

A MINERAL EXPLORATION
PROPOSAL IN THE
MAZATZAL WILDERNESS

Tonto National Forest
usda, forest service
southwestern region
albuquerque, new mexico



U.S. DEPARTMENT OF AGRICULTURE
Forest Service

MINERAL EXPLORATION PROPOSAL
MAZATZAL WILDERNESS

Notice of Availability of Final Environmental Statement

Pursuant to Section 102 (2)(C) of the National Environmental Policy Act of 1969, the Forest Service, Department of Agriculture, has prepared a Final Environmental Statement for a Mineral Exploration Proposal in the Mazatzal Wilderness.

The environmental statement considers probable environmental effects or impacts of a proposal for mineral exploration in the Mazatzal Wilderness.

Copies are available for inspection during regular working hours at the following locations: USDA, Forest Service, South Building, Room 3230, 14th Street & Independence Avenue, S.W., Washington, D.C.; USDA, Forest Service, Southwestern Region, 517 Gold Avenue, S.W., Albuquerque, New Mexico; and Tonto National Forest, 230 North First Avenue, Room 6428, Phoenix, Arizona.

Copies are available from the National Technical Information Service, U.S. Department of Commerce, Springfield, Virginia 22151; and Colorado Plateau Environmental Advisory Council, P.O. Box 1389, Flagstaff, Arizona 86001. A limited number of single copies are available from the Tonto National Forest, 230 North First Avenue, Phoenix, Arizona 85025.

Copies of the environmental statement have been sent to various Federal, State, and local agencies as outlined in the Council on Environmental Quality Guidelines.

U.S.D.A. FOREST SERVICE ENVIRONMENTAL STATEMENT

Environmental Effects of the Proposed Mineral
Exploration in the Mazatzal Wilderness
and Alternatives to the Proposal

Prepared in Accordance with
Section 102(2)(C) of P.L. 91-190

Summary Sheet

- I. Draft () Final (X)
- II. Administrative (X) Legislative ()
- III. Description of Action

Mr. R. B. Rodney and Mr. M. F. Dibble have located 22 mining claims in the Mazatzal Wilderness. They propose to diamond core drill three sites in order to determine the economic mineral potential of the claims. The depth of the core drillings would each be a maximum of 1,000 feet.

The purpose of this statement is to determine the method of ingress and egress into the Mazatzal Wilderness, the source of water to be utilized, and the support camp location for the purpose of prospecting for minerals that will create the least amount of adverse impacts on the environment. An Environmental Analysis and Report was prepared on this proposal which considered the adverse and beneficial effects of the proposal and alternatives on the environment. A Draft Environmental Statement was prepared that considered the proposal and seven alternatives. The draft statement was transmitted to the Council on Environmental Quality on September 25, 1972; and copies of the draft were sent to other governmental agencies and made available to the public subsequent to that date. The public and governmental agencies were invited to comment on the draft by November 1, 1972.

Written comments were received from 11 entities. After review and analysis of these written statements, a combination of alternatives 2 and 3, using a helicopter to transport equipment which cannot be packed to the site by animals, is recommended as the mode of access to and from the drill sites; alternative 4, supply water from a source outside the Wilderness, is recommended to provide water for the drilling

operation; and alternative 6, develop a support camp outside the Wilderness, is recommended as a staging area.

This proposed project is located within the Mazatzal Wilderness on Cave Creek Ranger District, Tonto National Forest, in Maricopa County, Arizona.

IV. Summary of Environmental Impact and Adverse Environmental Effects

The use of a helicopter to transport large equipment and material will require clearing the sparse vegetation for a heliport outside of the Wilderness and a helispot near the drilling sites. It might also be necessary to level the actual landing site as well as the drilling pad sites. Although such leveling will be filled in to conform with the surrounding landscape and the area reseeded upon completion of the use, it will result in the loss of the primeval and pristine character of the area for a number of years.

The use of motorized equipment will be in conflict with the basic philosophy of wilderness as defined by Congress in the Wilderness Act. This noise plus the dust from the drilling equipment will pollute the air temporarily. The noise and activity in the area is expected to temporarily displace the wildlife.

Soil erosion could occur from the disturbed sites. Water pollution could result from improper disposal of drilling waste.

V. List of Alternatives Considered

The proposal and following alternatives were considered:

- A. The proposal by Mr. Rodney and Mr. Dibble was to construct 3 miles of minimal jeep access road within the Wilderness and use four-wheel drive vehicles to transport equipment, supplies, and personnel to the drill sites.
- B. Alternative 1 was to do no mineral exploratory work in the Mazatzal Wilderness.
- C. Alternative 2 considered transporting all personnel, equipment, and supplies by pack animals over existing trails.

D. Alternative 3 discussed transporting drilling rigs, personnel, equipment, and supplies to the drilling site by helicopter. Mr. Rodney and Mr. Dibble submitted this proposal as their alternative.

E. Alternative 4 considered supplying water from a source outside the Wilderness and transporting it to the drilling sites in 55 gallon drums which would later be utilized as settling ponds.

F. Alternative 5 discussed supplying water from springs located within the Wilderness. Small check dams would be constructed at one of four spring locations and the water pumped through a flexible plastic pipe to the drilling sites.

G. Alternative 6 considered the development of a support camp outside the Wilderness to act as a staging area.

A spike camp at the drilling sites would provide only sleeping and eating facilities and would be supplied by pack animals from the support camp. The support camp would be serviced by four-wheel drive vehicles.

H. Alternative 7 discussed developing a large support camp within the Wilderness near the drilling sites. Material would be stockpiled at this location for use as needed.

VI. Written Comments Were Received From the Following Groups, Agencies, Individuals, and Companies

Arizona Wildlife Federation

National Wildlife Federation

Sierra Club, Southwest Office

Arizona Game and Fish Department

United States Department of Agriculture, Soil Conservation Service, Arizona State Office

United States Department of the Interior

United States Environmental Protection Agency

F. J. MacDonald, Chairman of Advisory Commission on Arizona Environment

H. Paul Friesema, Associate Professor at Northwestern
University, Evanston, Illinois

Salt River Project

Western Wood Products Association

VII. Dates Statements Made Available to CEQ and Public

Draft Statement - September 25, 1972

Final Statement - SEP 6 1973

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Environmental Effects of the Proposed Mineral
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Section 102(2)(C) of P.L. 91-190

August 1973

Type of Statement: Final

Date of Transmission to CEQ: SEP 6 1973

Type of Action: Administrative

Responsible Official: Wm. D. Hurst, Regional Forester
Southwestern Region, Forest Service
517 Gold Avenue, S.W.
Albuquerque, New Mexico 87101

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I. DESCRIPTION

A. Background

Wilderness land differs from other National Forest land in that it has been analyzed and set aside to be used in harmony with the uses which are in accordance with the wilderness objective which states: "The wilderness is to be managed in such a manner as to leave it unimpaired for future use and enjoyment as wilderness. . . . It is to be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use." (Forest Service Manual 2320.2) We can surmise from this that the basic purpose of a Wilderness is to provide an area untrammelled by man, an area left in its natural environment for man to visit and enjoy by primitive means of transportation. Thus, mankind may preserve and enjoy natural and unique features as they existed when he found them.

Even though the Wilderness has been set aside for a definite purpose and use, there are times when conflicting activities are proposed. To meet the objectives in wilderness administration, the Forest Service is striving to "accommodate and administer those uses and activities which are of the type generally prohibited by the Wilderness Act, but which are specifically excepted by that act or subsequent establishing legislation in such manner as to minimize their lasting impact on the wilderness resource, and values, and so that the end result will provide optimum total benefits to the American people." (Forest Service Manual 2320.3, emphasis added)

The natural environment which is described in detail in the body of the statement consists of the following: air, of a relatively standard quality; water, of which some is potable as it exists presently; soil temperatures, controlled by vegetative cover; water temperatures, controlled by vegetation and width of the drainage bottom; wildlife population, controlled essentially by water, food, and vegetative and geologic cover; riparian vegetation, dependent upon moisture content of the drainage; soil productivity, which has been established through time by climatic conditions; vegetative cover, which provides food and shelter for wildlife and protects the soil from erosion; and natural beauty which encompasses all of the above. If any of these components of the natural environment are altered or obliterated, the

environment of that portion of the Wilderness will change to some degree. To restore an area to its natural state after it has been disturbed is a very costly and sometimes impossible undertaking, especially in a semi-desert location in which the proposal is located.

Road construction on a short-term basis would leave a scar that might never heal. Such a scar could attract undue use and result in a change in the environment of the area forever.

More and more, we see land designated for certain types of uses which are compatible with uses on adjacent lands. Cities and counties have found that through this designation of use called planning and zoning, the growth and development of cities and counties become more functional and meaningful, resulting in adequate commercial facilities, residential areas, schools, parks, open spaces, and industrial areas. Likewise, a National Forest can provide wood, water, forage, wildlife, and recreation. Some of these resources are compatible and can be provided at the same time on one portion of land. This is called multiple use. In some instances, existing natural conditions point out that a certain tract of land is best suited to be managed for a single resource. In the same light, a wilderness has been designated to serve a particular use and may provide for more than one use at a time without distracting from the natural environment the wilderness was established to preserve. Thus, the natural environment is at stake when any changes threaten to alter it.

This Environmental Statement is concerned about the environment of a portion of the Mazatzal Wilderness.

B. Proposal

A proposal has been received to perform sufficient exploratory work to establish confidence in the economic mineral potential of some mining claims located in the Mazatzal Wilderness.

The claims site is situated in the southwest corner of the Mazatzal Wilderness, Mazatzal Mountain Mining District, Cave Creek Ranger District of the Tonto National Forest. The specific location is sections 7 and 8, Range 8 East and Township 7 North. It lies in the Copper Camp Creek

drainage. Access to the area is now about 9-1/2 miles by dirt road, jeep trail, and pack trail from the Horseshoe Dam-Verde River crossing.

The claims can be reached by driving 26 miles from Cave Creek in an east and northeast direction until reaching Horseshoe Dam; thence across the Verde River on the dam, and continue for about 2 miles to the K. A. Ranch headquarters. Beyond this, because of the poor quality of the road and trail, horseback or four-wheel drive transportation is recommended. From the ranch headquarters, proceed about 5-1/2 miles by road and finally jeep trail bearing right at all intersections. Just past the end of the jeep trail is the west boundary of the Mazatzal Wilderness. From this point, proceed by foot or horseback down about 1/2 mile of trail to Sheep Creek at its junction with Copper Camp Creek. Cross Sheep Creek and proceed about 1.6 miles by trail up Copper Camp Creek to Anderson Cabin. The claims area is a short distance up the drainage from this point.

Sponsors of the proposed project are: Mr. R. B. Rodney, 265 W. 1st Street, Mesa, Arizona 85201; and Mr. M. F. Dibble, 8537 E. San Miguel, Scottsdale, Arizona 85253.

Mr. Rodney and Mr. Dibble filed 22 mining claims totaling 440 acres and located in the Mazatzal Wilderness on December 8, 1970. They have since made application with the Tonto National Forest to prospect for minerals. They propose to core drill three sites to a depth of 1,000 feet. The drill and the required support equipment would be transported to the sites by four-wheel drive pickups. Construction of 3 miles of minimal jeep access road would be required. Their alternate proposal was to transport this equipment with a large helicopter and utilize an old miner's cabin on the South Fork of Copper Creek as a prime staging area.

To support the operation, the mining claimants proposed to utilize one of two sources of water within the Wilderness for the drilling operation. A series of 55 gallon drums would be utilized as settling ponds and be removed when exploration was completed. Slurry and drilling mud would be recirculated. The proposal included the establishment of a support camp at one of two sites within the Wilderness. A drilling period of 90 to 120 days is forecast with two crews working with one drill rig.

The sponsors have conducted a preliminary geochemical sampling program which indicated an anomalous copper content of from 3 to 15 times the regional background of 40 ppm. They feel this is significant. They also contend that portable equipment with a limited depth capacity of 100 to 200 feet would not provide the information needed to establish a true picture of the mineral potential of the area. A Forest Service mineral examination of the Copper Cliff claims concluded that the mineralization exposed on the claims warrants exploratory drilling to investigate the possible existence of underlying secondary enriched ore.

On September 25, 1972, the Forest Service released a Draft Environmental Statement outlining the proposal and listing alternative courses of action. The public and other governmental agencies were given until November 1, 1972, to comment. After reviewing public comments, a combination of alternatives 2 and 3 is recommended as the mode of access to the proposed drill sites, alternative 4 to supply water for the operation, and alternative 6 for the support camp.

The proposal would be to use a helicopter to transport only the drill and other equipment or supplies which cannot be transported by pack animals. A Longyear "34" drill with a gasoline engine and a net weight of 3,045 pounds would be used. It can effectively be broken down into three sections, each weighing approximately 1,000 pounds. The required support equipment consists of a slurry recycle pump, hoist, water tank, water hose, and gasoline-powered fresh water pump. Fuel, lubricants, tents for the drilling crew, approved sanitation facilities, drinking water, and supplies for the crew will also be needed. Animals will be used to transport personnel and all packable equipment and supplies. All refuse would have to be packed out.

This method of transportation was favored by the United States Environmental Protection Agency. The National Wildlife Federation and Mr. F.J. MacDonald also supported helicopter transportation.

This alternative would require the clearing of approximately 1/3 acre at each of the drill sites to allow for safe helicopter operation. The rugged terrain is made up of narrow ridges with steep side slopes. The sparse vegetation

is of the semi-desert species and includes shrub live oak, mesquite, catclaw, ocotillo, yucca, agave, saguaro, and other varieties of lesser cacti and native grasses. Arizona Cypress, sycamore, willow, and wild grape grow in scattered clumps in the canyon bottoms of Sheep Creek and Copper Camp Creek. Drill sites number 1 and 2 are slightly upslope from a drainage bottom; site number 3 is in a saddle. There is a site suitable for helispot construction, which would require minimal vegetative clearing of 1/2 acre in the canyon bottom near the spike camp site.

The equipment could be moved to the drilling sites from an area on a ridge top near the Wilderness boundary at an elevation of 2,960 feet. Approximately 1/2 acre would also be cleared at this site. This area is 3.6 miles from the claims and requires four-wheel drive travel for approximately 4 miles to reach the site. The highest drilling site is 3,720 feet elevation.

This mode of transporting the heavy equipment would have the least impact on the resources. The major impact would be at the heliport and supply area outside the Wilderness. However, this impact will be minimal with proper design of the site and prompt restoration after the use has terminated.

The drilling operation would require water. Approximately 15 to 20 gallons per minute of fresh water are needed for each hole until circulation can be established. Once this occurs, the water requirement will be minimal as water from the sludge will be recycled. This proposal advocates that the water be supplied from a source outside the Wilderness. This water would be hauled to the drilling site in the 55 gallon drums that would later be utilized as settling ponds. The sludge contained in these drums will be returned to the holes once the drilling is completed. This will prevent downhole sloughing and save numerous trips to a dumping area. The drill hole will be plugged so that it will not present a safety hazard to the public or become a trap for wildlife.

Under this proposal, a support camp would be established outside the Wilderness and would act as a staging and supply area. It would be located in the vicinity of the heliport. Supplies would be delivered to this camp by vehicle and thence to the mining claim area by pack animals or helicopter, depending upon the item's packability. Drilling crews would camp at a spike camp on the site of the old miner's cabin on the South Fork of Copper Camp Creek. The cabin is no longer in place.

The Mazatzal Primitive Area was established in May 1938 under authority of Secretary of Agriculture Regulation L-20. The area was so designated because of its varied vegetation, outstanding rock formations, and rugged character. In 1940, the Primitive Area became the Mazatzal Wilderness under authority of Secretary of Agriculture Regulation U-1. With the passage of the Wilderness Act by Congress in September 1964, the Mazatzal Wilderness was included in the National Wilderness Preservation System and is subject to the provisions of that Act. The subject claims are entirely within the Wilderness.

By definition, wilderness is an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.

However, the Wilderness Act specifically provides for the use of the land within the wilderness for mineral location until December 31, 1983. This use, however, is subject to reasonable regulations governing ingress and egress as may be prescribed by the Secretary of Agriculture.

Previous claims had been filed in the subject claims area by Mr. Anderson and Mr. Cline in 1956. They unsuccessfully tried to interest several other parties in doing exploratory work. Among these was American Smelting and Refining Company. Their geologist completed an examination and reported that there were fairly widespread and spotty oxidized copper occurrences along a relatively narrow mineralized zone. The company, however, did not feel that it was the type of deposit they were interested in at that time.

Years previous to this, other exploratory work was done in the claims area, and several shafts and tailing dumps resulted.

A Forest Service mining engineer made a mineral examination of the Anderson and Cline claims in October of 1967. His report stated that there was "sufficient evidence of a fairly wide zone of low grade carbonate copper to justify drilling a few diamond drill holes to check for the possible existence of underlying secondary enriched ores."

Summer thunderstorms during July, August, and September contribute to most of the 14 inches of annual precipitation. Snow fall is light. The area has a mean January temperature of 32°F and a mean maximum July temperature of about 102°F.

The soils in this section of the Mazatzal Wilderness are developing in a thermic soil temperature class in a 14- to 19-inch precipitation zone. Soils are shallow, weakly developed, and moderately to highly erodible.

The three proposed drill sites are on a shallow stony McFadden-like soil over fractured quartzite. Outcrops of quartzite bedrock are found. The McFadden-like soil is a weakly developed clay loam soil with 50 to 80 percent stones and is 10 to 20 inches deep over fractured bedrock. This soil is moderately to highly erodible. Once disturbed, it will not be possible to stabilize the disturbance without special revegetation practices.

The proposed support camp outside the Wilderness boundary is on soil and geologic materials similar to the proposed drill sites.

The proposed spike camp site and helispot within the claims area are on a more gently sloping river terrace. The soil materials are several feet deep and are subject to gully erosion. The soil materials are highly stratified and range in texture from extremely stony sand to a deep clay loam.

The riparian habitat downstream from the claims area is an important nesting area for white-wing doves, mourning doves, western tanagers, hooded orioles, Arizona cardinals, Gambel quail, and several other bird species. Also, a small fish population of long-fin dace (*Agosia chrysogaster*) and suckers (*Catostomus* spp.) is found in the lower part of Copper Camp Creek Canyon.

Deer, javelina, and coyote are among the large resident wildlife species in the claims area.

Copper Camp Creek is an intermittent stream during most of the year. The main channel is in a semi-stable condition having been scoured by flooding in recent years. In many areas, bedrock is exposed in the channel. Banks are steep, and adjacent slopes are convex. Much of the area is armored by rock outcrop, cobbly alluvial, and coluvial materials.

The exposed bedrock in the streambed forms a barrier to subsurface stream flow, forcing the water to the surface in a few areas. This water has been referred to as springs

by Mr. Rodney and Mr. Dibble. Because its source is within a well-defined channel, and the nature in which it occurs, these pockets of water would not normally be considered springs, but rather surface flow.

Chemical analysis from two of these seeps (referred to as springs #1 and #3 on the attached map) indicate that the water is of high quality suitable for drinking. Seep number 4 is either dry or nonexistent. There is some question as to the availability of the water in this area in that all surface waters of the Verde River and its tributaries have long been appropriated by downstream water users. According to a letter from the U.S.D.A. Office of the General Counsel dated June 15, 1971, the surface water is not available under Federal law to private parties, and water rights problems should be resolved by the State.

II. ENVIRONMENTAL IMPACTS

The natural beauty of the Wilderness in the sense of "an area where the earth and its community of life are untrammelled by man" will experience the largest impact.

Wilderness has been defined by Congress as an area of undeveloped land, ". . . retaining its primeval character and influence without permanent improvements or human habitation. . . ." It has been further defined as an area that ". . . generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable. . ." and ". . . has outstanding opportunities for solitude. . . ."

Any evidence of the use of motorized equipment will be in direct conflict with the basic philosophy of wilderness as defined by Congress in the Wilderness Act. Any dynamiting of rock, or clearing of vegetation and site leveling for helispots and drill sites, will result in a loss of the primeval and pristine character of the area within sight of such disturbance.

However, under the Act of June 4, 1897, the right of ingress and egress for prospecting, locating, and developing mineral resources is a statutory right. It is the understanding of the Forest Service that within Wilderness the right shall be exercised under reasonable rules and regulations established by the Secretary of Agriculture.

With the Wilderness Act and the Mining Act mentioned above, it becomes a matter of degree of how much of what type of encroachment can be allowed.

If drilling substantiates the presence of a large body of ore and mining results, a portion of the Mazatzal Wilderness could be lost. Construction of helispots, pads, and camp sites will result in shallow soils being disturbed and possible erosion taking place. Any sludge or tailings left after the drilling has been completed will contrast with the surface soil.

If a full-scale mining operation were to result because of the proposed drilling explorations, the claims eventually could be patented. A road could be constructed to the site, and the ore would be mined. The value of the wilderness resource would be decreased, while the mineral resource would be utilized. The development would create jobs and enhance the economic environment.

Should a full-scale mining operation result from this proposal, a large amount of water would be needed from local sources. Downstream riparian vegetation could be affected should this water be utilized.

The construction of one heliport (helicopter landing area serviced by roads), one helispot (helicopter landing area not served by roads), three drilling sites containing 1/3 acre each, more or less, one support camp, and one spike camp would affect the following resources:

Air

The proposed drilling operation would have a very minor, short-term effect on air quality in the immediate area. It would be in the form of noise and dust from the drilling equipment.

A similar situation would exist in the case of the proposed helicopter operation. The air quality would be affected temporarily by dust during landing and taking off. A considerable amount of noise would be generated during flights, but this would be of short duration.

Thus, dust, noise, and smoke created by internal combustion engines would temporarily degrade the air quality in the local area.

Natural Beauty

The placement of the drilling rig and settling drums may require the temporary leveling of small areas. This is especially so for drill holes #1 and #3 (see attached map). An area of approximately 1/3 acre in size will have to be cleared of any vegetation that will interfere with the helicopter operations.

If the disturbance is held to a minimum, it would seem reasonable that the slopes could be restored to a natural grade and reseeded with native species of grasses. The sites are visible from the adjacent slopes. The diameter of the actual drill hole would only be 4 inches; therefore, its impact would be negligible. However, such a hole, if drilled in soil and left unplugged, may widen due to sloughing and erosion, forming a safety hazard for animals and humans. Sludge from the drilling operation, if allowed to spill over on the ground, would leave a lasting contrast with the surface material. It should, therefore, be adequately disposed of. Once drilling is completed, the sludge should be returned from the drums to the drill hole to prevent downhole sloughing. A possible disposal site for any additional sludge would be one of the old mining shafts found in the claims area.

The proposed helispot and the heliport sites are located in areas of sparse vegetation so that a minimum of clearing will be required. By insuring that the perimeter of the clearing is irregular in shape, the sites should retain much of their natural appearance after the sites are abandoned and revegetated. Soil disturbance should be held to a minimum at these sites also.

Outdoor Recreation

Although visitor use in the Mazatzal Wilderness is light, especially when compared with the Superstition Wilderness, it has increased 25% within the past 6 years. During 1971, 8500 visitor days were recorded as compared to 6400 in 1965. Population trends in Arizona, together with a developing appreciation of wilderness, indicate that the use will continue to increase. The period of April through December accounts for about 90% of the total use which is primarily deer and bear hunters.

While the mining claims lie within the big game hunting zone, most of the hunting activity takes place near the eastern edge of the Wilderness. This is basically because of easier access found on that side. If big game are scared away from the claims area, it would only be while the project is in operation.

It is not anticipated that the drill project will appreciably affect the present major recreation activity of the Mazatzal Wilderness. If the proposed work was scheduled during a period other than April through December, there would be even less of a potential conflict.

Range

The claims area lies within the Sears Grazing Allotment. The occupation of the proposed drilling sites, spike camp, and support camp would not affect the grazing to any appreciable degree. Cattle are usually not spooked by the presence of men or machinery. However, a low-flying helicopter may disrupt cattle temporarily for short periods of time.

Soils

This is a highly sensitive environment because of the low precipitation and warm temperatures. Any great disturbance of the area could destroy the vegetation and increase soil erosion. The removal of the shallow soil will expose raw geologic rock that will require hundreds of years to again weather to soil. Erosion could remove the unstable decomposing quartzite or schist, and disturbed areas may never heal.

The thin soil mantle is essential for the growing of a protective cover. The soil forms the seedbed and is the major source of plant nutrients and water. The established plants draw additional moisture from the fractured bedrock.

Any leveling of heliports, helispots, or drilling sites would expose bare soil and geologic rock and increase erosion. These soils are moderately to highly erodible and should be protected. Once disturbed, it will not be possible to again stabilize without special revegetation practices. Tailings and sludge from drilling operations will also contrast with the surface soil.

The proposed spike camp is situated on the river fan which is subject to gully erosion. Any uncontrolled surface water runoff from higher areas would cause an increase in the erosion rate.

Timber

Since there is no timber in the claims area, none would be affected by the proposed project.

Water

Any water, slurry, machine oil, or other residue used in the proposed drilling operation should not be returned to or deposited in the stream channel. These wastes should be either removed from the area or disposed of in such a way that they will not pollute either the groundwater or surface water.

If drilling takes place, strict inspection and supervision would be needed to assure that any water leaving the watershed remains of a high quality.

Wilderness

Any operation of motorized equipment will break the "solitude" of Wilderness. However, it can be a short-term conflict which ceases when the operation stops and equipment such as a water pump and helicopter is removed. The operation of a diamond core drill itself will not produce as great a loss of wilderness solitude if the actual drilling operation does not result in substantially showing "the imprint of man's work." Drill site construction will destroy the pristine, "untouched by man" characteristic of all land from which the developments can be seen.

Wildlife

The drilling of the three proposed test holes on the subject claims will have a minimal effect on the resident wildlife in the area. By hauling water to the site, the integrity of the stream and its associated riparian vegetation and wildlife habitat will be maintained. The dace which is presently found in lower Copper Camp Creek will be affected by increased siltation if overflow or leakage from the drill mud settling drums occurs. Otherwise, bird nesting areas and fish populations would not be affected.

The increased human activity on the claims area will probably cause a temporary movement of deer, javelina, coyote, and other resident animals from the drilling locale. After completion of the proposed work and subsequent withdrawal of human activity, the immediate area should be reinhabited by the large resident wildlife species found in that area.

The spike camp located at the old mining camp and the support camp near the Wilderness boundary should have a minimal effect on wildlife since they are not near natural watering holes.

If copper is discovered in any appreciable amount, care should be taken not to pollute the limited water supply in Copper Creek. Copper sulfate can kill phreatophytes such as cottonwood and sycamore which are the two main tree species found in the riparian zone.

Fire

With a fire plan, proper firefighting tools, and approved spark arrestors on all internal combustion engines, the danger of fire can be kept to a minimum.

Insects and Diseases

The proposed project should not have any effect on insect infestation or plant disease incidence.

Landownership Adjustment

The claims area is entirely on Federal land of the Tonto National Forest.

Land Use

The claims area receives very little use except by the grazing permittees, Mr. T. E. Leavy and Mr. J. Thomas McCarthy, within the Sears Allotment.

It was previously claimed by the Copper Cliffs Claim No. 1-17 located by Kenneth L. Anderson and Lech Cline on February 11, 1956.

Transportation

The claims area is about 2-1/2 miles inside the Wilderness boundary. The rugged terrain increases the difficulty of transporting equipment and supplies to the drill sites. For all practical purposes, the heavy drill rig (3,045 lbs.) can only be brought to the site by a large helicopter or four-wheel drive vehicles. Pack animals can carry the majority of the other equipment and supplies.

Information and Education

The unique quality of a wilderness can be lost through mineral exploration and development. On the other hand, an ore body may help produce a necessary product. It will have to be decided whether a mineral resource or a wilderness resource can do the greatest good for the most people over the long run.

Historical and Archeological

No known historical or archeological sites would be affected by the proposed drill sites, heliport, helispot, or camp sites. There are no sites within the area of operations which are on, or would qualify for, the National Register of Historic Sites.

Social and Cultural

Any consideration of environmental impacts has to concern itself with the intangible relationship of man to his environment. One of the objectives of the environmental analysis and draft statement is to determine the attitude of the general public toward the proposal. Public response to the draft statement indicates the proposed action to be controversial and, therefore, can be considered to have social and cultural effects on a large number of people.

As metropolitan areas grow in size, the need for open space and natural areas will increase. A visitor to the Mazatzal Wilderness in search of "solitude" would view the proposed mining operation as being in direct conflict with his needs and desires.

Economics

Prospecting will enable Mr. Rodney and Mr. Dibble to determine if there is a sufficient ore body present to develop a feasible mine in the Copper Camp Creek area. If a full-scale mining operation were to result because of the proposed drilling explorations, the claims eventually could be patented.

A full-scale road would be constructed to the site, and the ore would be mined for profit. The value of the wilderness resource would be decreased, while the mineral resource would be utilized. The development would create jobs and enhance the economic environment.

III. FAVORABLE ENVIRONMENTAL EFFECTS

There are no favorable effects to the physical environment to be realized from the proposed mineral exploration. However, should a marketable body of ore be discovered as a result of the proposed exploration, many Americans will benefit from the resultant copper products.

Copper is the most important nonferrous metal in use today. It ranks second only to iron, both in quantity and value of world output of our natural resources. Alloyed into bronze, it is one of man's oldest and most useful metals. It has made possible the large-scale electrical progress that is enjoyed by every modern nation. Our high standard of living and our national security depend on adequate supplies of copper. The United States is the world's largest producer and consumer of copper, producing nearly 1/3 of the total and consuming nearly 1/2 of it (Arizona's Natural Resources, a review prepared for the Arizona Development Board by Arizona Research Consultants, Inc.).

During 1971, Arizona continued to lead the nation as a copper producing state as it has every year since 1910. Over 820,000 tons of copper were produced to provide a revenue of over \$851,900,000. This accounted for 53.9 percent of the nation's total production, and was 3 times the output of second-place Utah. Copper accounted for 87 percent of the total mineral value Arizona produced during 1971. (Figures from 28th annual edition of Arizona Statistical Review.)

The mineral resource is nonrenewable, and each mineral deposit is a finite quantity. Once an ore body has been exhausted, a new and larger one must be brought into production to meet the growing demand for copper. Thus, the only favorable environmental effects of this proposal are related to the social and economic aspects of the use of copper in this country.

IV. ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

Any mechanical encroachment into the wilderness solitude would create an adverse effect. It would be in direct conflict with the basic philosophy of wilderness. In addition to the noise pollution, the motorized equipment will also create temporary pollution through the creation of dust and smoke in the vicinity of the drill sites, heliport, and helispot.

Any extensive earth work in leveling drill pads or wasting sludge down hill sides would also cause lasting contrasts on the landscape and could adversely affect the water quality as well as the aquatic life. Man's imprint in the wilderness would then be more evident.

Resident populations of deer, javelina, and coyote would be temporarily displaced by drill site construction and operation, as well as by the low-flying helicopter.

V. ALTERNATIVES CONSIDERED

Proposal

This alternative is Mr. Rodney and Mr. Dibble's proposal and was considered as such in the Draft Environmental Statement. The proposed drill transportation system would require the construction of 3 miles of minimal jeep access road within the Wilderness boundary. The alignment would branch off to the south near the end of the existing jeep trail. It would descend, cross Sheep Creek, and ascend the opposite slope. Crossing the Wilderness boundary, the alignment would continue to the top of the ridge that separates the South Fork of Sheep Creek and Copper Camp Creek. The narrow ridge line would be followed until reaching the claims area. The alignment would then drop down and cross the South Fork of Copper Camp Creek. The drill and required support equipment would then be transported on the bed of a four-wheel drive pickup.

Impact Evaluation

This alternative would temporarily affect air quality during construction and, to a smaller extent, during the actual use of the road. Vehicle operation would create minor noise pollution.

This is a highly sensitive environment because of the low precipitation and warm temperatures. A thin soil mantle exists and is essential to support the protective plant cover. The construction of a primitive road would remove the soil and expose raw geologic rock that would require hundreds of years to again weather to soil. Building drill pad access routes to sites 2 and 3 which would facilitate a four-wheel drive vehicle with drill rig would require extensive earthwork. It would be very difficult to return those areas to their natural state.

Much of the proposed access road would be visible from higher, adjacent areas including sites outside the Wilderness. The vegetation is thin and sparse along the proposed alignment and would offer little concealment. The natural beauty of the Wilderness in the sense of "an area where the earth and its community of life are untrammelled by man" would be affected. A constructed road would produce a long-term conflict with wilderness values because of the lasting scars, as opposed to temporary degradation which results from the temporary noise pollution.

The proposed access road could possibly cause a change in livestock grazing habits. In traversing terrain, cattle tend to take the easiest route. This could result in overgrazing along the proposed road. Since the alignment follows exposed ridge lines, it might also increase the natural erosion rate.

The Salt River Project expressed concern over the potential increase in sediment production which reduces the capacity of the reservoirs. The main source of such sediment is road cuts. Their main concern was that the road be designed to keep sediment losses to a minimum while providing adequate drainage to prevent ponding and loss of water to the downstream water users.

The Arizona Wildlife Federation was opposed to this alternative because it was in direct conflict with the long-term use for which the area was set aside. They did not feel that sacrificing the long-term use for short-term mineral exploration was justified.

This method of transportation has the greatest environmental impact and was, therefore, not selected.

Alternative 1

Do no mineral exploratory work in the Mazatzal Wilderness.

Impact Evaluation

This proposal would have the least impact on the environment. The Arizona Wildlife Federation points out that this is the only action compatible with wilderness, but it also realizes the exceptions written into the Wilderness Act. Mr. H. Paul Friesema points out the recent Federal Court ruling to ban mining and mineral exploration work in the Boundary Waters Canoe Area Wilderness. However, the Wilderness Act is explicit in that under existing mining laws, the use of the land for mineral location within the wilderness may continue until December 31, 1983. This use is subject to reasonable regulations governing ingress and egress as may be prescribed by the Secretary of Agriculture. It is for this reason that this alternative was not selected.

Alternative 2

Transport all personnel, equipment, and supplies by pack animals over existing trails. This would entail a ride of approximately 1-1/2 hours on an existing trail from a support camp located outside the Wilderness boundary.

Impact Evaluation

This method of transporting the equipment would require the use of portable drill rigs with a limited depth capacity of 100 to 150 feet. It has been determined that this limited exploration would not provide the information needed to establish a true picture of the mineral potential of the area such as the proposed 1,000-foot depth drilling would. It was for this reason that this portion of the alternative was not selected.

This means of transporting personnel and supplies to the point of exploration is reasonable; however, the drill rig should be transported by some other means. The impact upon the environment would be no greater than the impact of using horses and mules to pack into the Wilderness for other purposes such as recreation rides. If pack stock were allowed to graze, there could be some deterioration of the range. Such an impact could be offset by packing feed for the horses into the Wilderness. Concentration of the pack stock could cause some surface disturbance to vegetation and soil. This portion of the alternative was selected because it is considered to be reasonable access. This mode of transporting the packable supplies and personnel is in keeping with wilderness concepts and would create the least environmental impacts.

The Arizona Wildlife Federation favored transporting everything by this method over helicopter transportation. It felt there would be less disturbance to the area and that mining problems would not be insoluble.

Alternative 3

Transport drilling rigs, personnel, equipment, and supplies to the site by helicopter. This type of operation would require a helicopter base at some point outside of the boundary and at each of the three drill sites.

Impact Evaluation

The use of a helicopter would preclude the necessity of building an access road or support camp within the Wilderness. Helispots would need to be constructed at each drill site. This would require the removal of some of the vegetation and large rocks within the helispot area. This disturbance could be lessened by locating the helispots in a natural clearing. The pad on which the drill sets would be cleared and leveled. This disturbance could be kept at a minimum by again choosing drill sites which are in natural openings. The use of a helicopter and a drill rig within the Wilderness would require permits.

Alternative 4

Supply water from a source outside the Wilderness. The water would be transported to the drill sites in 55 gallon drums which would be later utilized as settling ponds.

Impact Evaluation

This method of supplying water would eliminate the need of developing water supply at springs within the Wilderness. Other impacts are associated with the method of transporting the water to the drill sites. These impacts are covered in the proposal and in alternatives 2 and 3 above.

This alternative was selected because there is less chance of disrupting the ecological balance of the downstream riparian vegetation than if water from the stream were utilized.

The National Wildlife Federation and Arizona Wildlife Federation supported this alternative as being the most logical means of reconciling the wilderness character of the terrain with legitimate mineral exploration.

Alternative 5

Supply water from springs located within the Wilderness. This method of supplying water would require the construction of small check dams at one of the four springs in the Copper Camp Creek drainage. The major source, spring #1 on the attached map, is at the Anderson Cabin. Springs #2 and #3 are in evidence near the junction of the North and South Forks of Copper Camp Creek. The sponsors proposed the development of spring #4

which was not in evidence at the time of the field review of this project. As proposed, the water would be pumped through a flexible plastic pipe; or, if a road was built, it would be hauled from the spring to the drilling sites by four-wheel drive vehicles.

Impact Evaluation

By utilizing flexible plastic pipe, rubber holding tanks, and portable pumps, the natural beauty of the area would only be temporarily degraded. The temporary development of a water source, if carefully done, could easily be returned to its natural state.

However, if development of a water source necessary for drilling causes the downstream areas to dry up, the riparian habitat could be lost. Bird nesting areas and fish populations would be affected.

The containment of the springs would be an impact on the wilderness character of the area. There would be some disturbance to the area during the construction of any dams or boxes to store the water.

Other impacts are dependent on the method of transporting the water to the drill sites. These impacts are covered in the original proposal and alternatives 2 and 3.

The surface water in Copper Camp Creek is not available under Federal law to private parties. Such water would be available under the reservation principle only if the United States, through its agents, contractors, or employees, used the water for a Federal purpose. Water right problems such as those of Mr. Rodney and Mr. Dibble should be resolved by the State.

Because of the above-mentioned environmental impacts, this alternative was not selected. The Salt River Project stated that inasmuch as all the surface waters of the Verde River and all its tributaries have long been appropriated by downstream water users, including shareholders of the Salt River Valley Water User's Association, the use of such water in either the exploratory drilling or any subsequent mining operations will be vigorously protested by the Association.

Alternative 6

Develop support camp outside the Wilderness. Such a camp would act as a staging area from which personnel, equipment, and supplies would be moved to the drilling site. A proposed camp site is located approximately 3 miles from the drilling sites which is approximately a 1-1/2-hour trip by horseback on existing trails. The elevation at this site is 2,960 feet and is suited for a heliport. A spike camp consisting of sleeping and cooking facilities for the drilling crew can be established on the drilling site and supplied by pack animals.

Impact Evaluation

A support camp outside the Wilderness boundary would reduce the impact on the Wilderness itself. Large quantities of supplies could be trucked to the site for transportation into the Wilderness as needed. A camp site could be located in such a way that surface disturbance could be kept to a minimum.

The small spike camp near the drilling sites would have a minimal impact on the Wilderness. Refuse would be packed out when supplies are brought in. Because of the location of the camp in relation to the stream, and the duration of use, approved sanitation would be required.

This alternative was selected because it would cause less environmental impact than having a large support camp in the Wilderness. Both the National Wildlife Federation and the Arizona Wildlife Federation favored this alternative.

Alternative 7

Develop a support camp within the Wilderness. All supplies would be held at this site until needed. The camp would provide the sleeping and eating facilities for the drilling crew. The helicopter would transport those items which could not be packed to the camp site by animals. All other items would be transported by pack animals.

Impact Evaluation

The establishment of a permanent support camp within the Wilderness would cause more surface disturbance to the vegetation and soil than the spike camp previously proposed. The camp would be larger with more activity in the immediate

vicinity and more materials would be stored there. The soils in the area are subject to gully erosion. Surface disturbance could trigger the gullying process on the camp site.

Although the disturbance at the camp site would be greater within the Wilderness, such a camp would alleviate the need for a spike camp, thus confining the disturbance to one area. A staging area would be required, however, to assemble the items to be transported to the camp. A heliport at such a site would also be required.

This alternative was not selected because of the additional environmental impacts within the Wilderness.

VI. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USE OF ENVIRONMENT AND MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

While a mining operation is a short-term use, a wilderness must be considered a resource for long-term use. If the proposed exploration work were done in a way in which it would not leave man's imprint on the Wilderness, the long-term productivity would not be affected.

The combined use of animals and helicopter to transport personnel, supplies, and equipment in and out of the Wilderness will satisfy the need of Mr. Rodney and Mr. Dibble to determine the possible existence of an underlying, secondary enriched ore body. The methods proposed would have the least environmental impact possible on the Wilderness while still providing the reasonable ingress and egress for mineral location as specified by the Wilderness Act.

VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

If the proposed drilling reveals a mineral resource of great enough economic potential, it is conceivable that a full-scale mining operation would result. In that case, a portion of the wilderness resource would be lost.

On the other hand, if the proposed action showed evidence that the mineral resource was not of great enough economic potential, there would be sufficient evidence to discourage future exploratory work. That particular area of Wilderness would then be safeguarded for its long-term use.

VIII. CONSULTATION WITH OTHERS

A. Written Statements Received

The written statements received on the Draft Environmental Statement are presented in the following groups:

1. Conservation and Environmental Groups
2. Other Governmental Agencies
3. Private Individuals
4. Resource Using Companies or Associations

B. Statistics of Written Statements Received

1. Response - letters from 11 entities
 2. Geographic Distribution:
 - a. Within the Tonto National Forest 2
 - b. Within the State of Arizona (other than the Tonto National Forest) 4
 - c. Outside the State of Arizona 5
- Total 11

3. General Opinion and Respondents' Affiliations

	<u>Private Indiv.</u>	<u>Resource User</u>	<u>Environment or Conservation Group</u>	<u>Other Govt. Agency</u>	<u>Total</u>
Proposal					0
Alternative #1					0
Alternative #2			1		1
Alternative #3	1		2	1	4
Alternative #4			2		2
Alternative #5					0
Alternative #6			2		2
Alternative #7					0
No specific opinion or adverse comment	1	3		2	6

- C. A complete record of responses received from interested parties is contained in the Appendix. Comments relating to specific alternatives are contained in the subject areas of this Final Environmental Statement. The following is a synopsis of comments relating to the plan in general and the Forest Service response:

1. United States Department of the Interior. Suggests that the draft statement lacks sufficient information and depth in describing the project, the existing environment, impacts, and alternatives. Also felt that the environmental impacts associated with mineral extraction should be explored, as such an operation might follow the proposed action.

More detail has been incorporated into the final statement in an attempt to make the proposal and alternatives clearer. Should mineral extraction follow the proposed action, a separate environmental statement would be prepared based upon a detailed proposal rather than upon conjecture at this point in time. More specific comments by the Department have been incorporated into the statement.

2. H. Paul Friesema of Northwestern University in Evanston, Illinois. Felt that the procedures followed in preparing the draft statement were fundamentally in error.

The procedures comment was answered by letter, a copy of which is contained in the Appendix.

3. United States Environmental Protection Agency. Felt that the statement clearly points out basic conflict between wilderness preservation and the proposed mineral exploration and indicates most of the adverse effects of the alternatives regarding access.
4. National Wildlife Federation. First letter indicated that the proposition was sufficiently clear to make a choice of alternatives. A later letter suggested that the information was inadequate for a reader or decision-maker to reach a conclusion as to comparative impacts of the feasible project alternatives. It requested a supplement to the draft statement be circulated for public review.

More detail has been incorporated into this final statement.

5. Salt River Project. Comments concerning the use of water were incorporated into the statement.

6. United States Soil Conservation Service. Stated that the impacts of the proposed action relating to soil and water conservation and the environment were adequately considered.
7. Arizona Wildlife Federation. Comments were very specific and are indicated in the text of this statement.
8. Western Wood Products Association. Felt that the alternatives to accommodate exploration were examined in almost exhaustive detail, but were reasonable and objectively stated. Urged that the parties involved meet requirements of related statutes in a manner which will satisfy both private and public rights and interests.
9. Sierra Club, Southwest Office. Felt that the statement fairly depicts the environmental consequences of the proposed operation except for some specific items. These items are referred to and hopefully answered in the text of this statement.
10. Arizona Game and Fish Department. Felt the statement was comprehensive and objective, but that there would be significant and permanent wildlife losses and environmental degradation with the project.
11. F. J. MacDonald. Indicated that the Advisory Commission on Arizona Environment was generally opposed to any intrusions on wildernesses, activities which have lasting impact on Forest lands, and to any pollution-producing activity on Forest lands. Specific comments were incorporated in the text.

The Final Environmental Statement will be sent to the following agencies, groups, and individuals.

U. S. Department of the Interior
Washington, D. C.

Council on Environmental Quality
Washington, D. C.

Environmental Protection Agency
San Francisco, California

Honorable John J. Rhodes
House of Representatives
Washington, D. C. 20515

Honorable Sam Steiger
House of Representatives
Washington, D. C. 20515

Honorable Paul J. Fannin
United States Senate
Washington, D. C. 20510

Honorable Barry Goldwater
United States Senate
Washington, D. C. 20510

Honorable John B. Conlan
House of Representatives
Washington, D. C. 20515

Soil Conservation Service, USDA
State Office, 6029 Federal Building
Phoenix, Arizona 85014

Senator Ray A. Goetze, Chairman
Natural Resources Committee
Senate Wing - State Capitol
1700 W. Washington
Phoenix, Arizona 85507

Representative Sam Flake, Dist. 21
House Wing - State Capitol
1700 W. Washington
Phoenix, Arizona 85507

Representative Peter Kay, Dist. 21
House Wing - State Capitol
1700 W. Washington
Phoenix, Arizona 85007

Arizona State Clearing House
3003 N. Central
Phoenix, Arizona 85012
(10 copies for their distribution
to State agencies)

Arizona Council of Governments
Governor's Office, State Capitol
1700 W. Washington
Phoenix, Arizona 85007

Colorado Plateau Environmental Advisory Council
P. O. Box 1389
Flagstaff, Arizona 86001

Advisory Commission on Arizona Environment
206 S. 17th Avenue
Phoenix, Arizona 85007

Office of the Board of Supervisors
Maricopa County
602 County Administration Building
111 S. 3rd Avenue
Phoenix, Arizona 85003

Grazing Advisory Board
Tonto National Forest
Stephen L. Bixby, Chairman
Bixby Ranch, P.O. Box 311
Globe, Arizona 85501

Salt River Project
P. O. Box 1980
Phoenix, Arizona 85001

National Wildlife Federation
1412 16th Street, N.W.
Washington, D. C. 20036

Arizona Wildlife Federation
P. O. Box 1769
Phoenix, Arizona 85001

Sierra Club
2014 E. Broadway
Tucson, Arizona 85717

The Wilderness Society
4260 E. Evans Avenue
Denver, Colorado 80222

The Wilderness Society
Miss Kay Younger
Staff Assistant
729 Fifteenth Street, N.W.
Washington, D. C. 20050

Tucson Audubon Society
P. O. Box 3891
Tucson, Arizona 85717

Maricopa Audubon Society
1813 West Wier Avenue
Phoenix, Arizona 85013

Western Woods Products Association
918 Simms Building
203 Fourth Street, S. W.
Albuquerque, New Mexico 87103

Arizona Chapter, Wildlife Society
c/o Mr. Dave Brown
Arizona Game and Fish Department
P. O. Box 9095
Phoenix, Arizona 85020

Arizona Cattle Growers Association
Adams Hotel, Room 274
Phoenix, Arizona 85004

Arizona Wool Growers Association
132 South Central Avenue
Phoenix, Arizona 85004

Southwest Forest Resource Affairs
Federal Timber Purchasers Association
P. O. Box 14429
Albuquerque, New Mexico 87111

Western Forest Industries Association
P. O. Box 1771
Vernal, Utah 84078

Arizona Conservation Council
P. O. Box 1771
Scottsdale, Arizona 85252

Society for Range Management
Dr. Erving M. Schmutz
School of Agriculture
University of Arizona
Tucson, Arizona 85721

Society of American Foresters
Arizona Section, District 3
T. F. Arvola
Division of Forestry
The Resources Agency
Sacramento, California 95814

The Wildlife Society
Arizona Chapter
Mr. Buddy D. Bristow
4343 W. Paradise Lane
Phoenix, Arizona 85029

Tucson Wildlife Unlimited, Inc.
P. O. Box 4458
Tucson, Arizona 85717

Audubon Society
Mr. Marshall W. Whitmire
635 North Drew
West Mesa, Arizona 85201

Mearns Wildlife Society
P. O. Box 3337
Tucson, Arizona 85722

The Arizona Republic
P. O. Box 1950
Phoenix, Arizona 85001

Phoenix Gazette
Mr. Dwayne Smith
120 E. Van Buren
Phoenix, Arizona 85004

Humble Oil & Refining Company
1758 W. Grant Road
Tucson, Arizona 85705

Exploration Office
Mr. Robert C. Moore
550 West Ina Road
Tucson, Arizona 85704

Humble Oil & Refining Company
P. O. Box 120
Denver, Colorado 80201

Phelps Dodge Corporation
Western Exploration Office
Drawer 1217
Douglas, Arizona 85607

Kerr-McGee Corporation
Kerr-McGee Building
Oklahoma City, Oklahoma 73102

Union Carbide Corporation
Mining & Metals Division
P. O. Box 1049
Grand Junction, Colorado 81501

American Smelting & Refining Company
Exploration Department
SW U.S. Division
P. O. Box 5747
Tucson, Arizona 85703

Utah International, Inc.
Mr. Donald L. Humphreys
550 California Street
San Francisco, California 94104

Humble Oil & Refining Company
Mr. Gerald D. Ortloff
Environmental Advisor
P. O. Box 2180
Houston, Texas 77001

Ideal Cement Company
Mr. R. P. Comstock
Director of Exploration
P. O. Box 1949
Ft. Collins, Colorado 80521

The Brookings Institution
1775 Massachusetts Avenue, N.W.
Washington, D. C. 20036

Mr. Fred Gross, Jr., Director
Region 10
National Wildlife Federation
2916 Chama, N.E.
Albuquerque, New Mexico 87112

Mr. Ed Merrick
Field Representative
National Wildlife Federation
710 S. 41st Street
Boulder, Colorado 80303

Mr. K. W. Sax
Area Hydraulic Engineer
USGS, Conservation Division
W-2231 Federal Building
2800 Cottage Way
Sacramento, California 94111

Mr. Floyd Everett
Liaison Officer
Bureau of Mines
2721 N. Central
Room 1012
Phoenix, Arizona 85504

Dr. H. Paul Friesema
Public Lands Policy Project
Center for Urban Affairs
Northwestern University
2040 Sheridan Road
Evanston, Illinois 60201

Mr. Lawrence Royer
Assistant Professor
Utah State University
Logan, Utah 84321

Mr. Larry Kusche
University Library
Arizona State University
Tempe, Arizona 85281

Mr. Cleo Anderson
P. O. Box 442
Cave Creek, Arizona 85331

Dr. John Ricker
2950 N. 7th Street
Phoenix, Arizona 85014

Mr. Robert L. Prather
10840 N. 15th Avenue
Phoenix, Arizona 85029

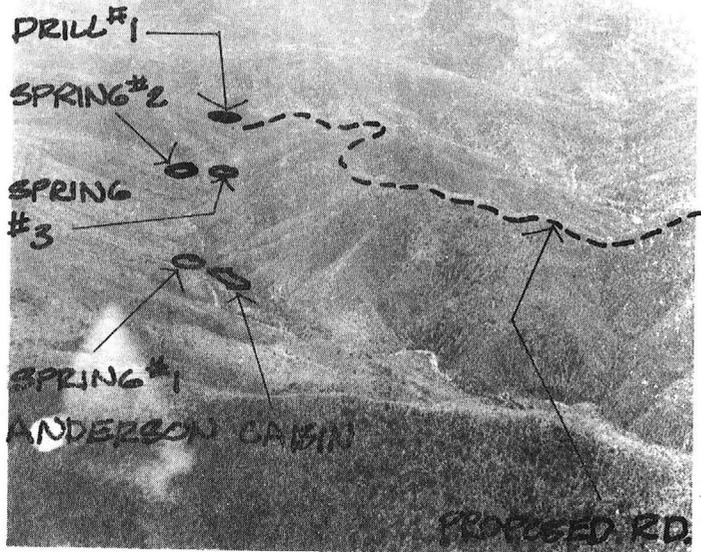
Mr. W. R. Childs
P. O. Box 84
Cave Creek, Arizona 85331

Mr. Reino Rickkila
U.S. Geological Survey
Room 5017, FOB
Phoenix, Arizona 85025

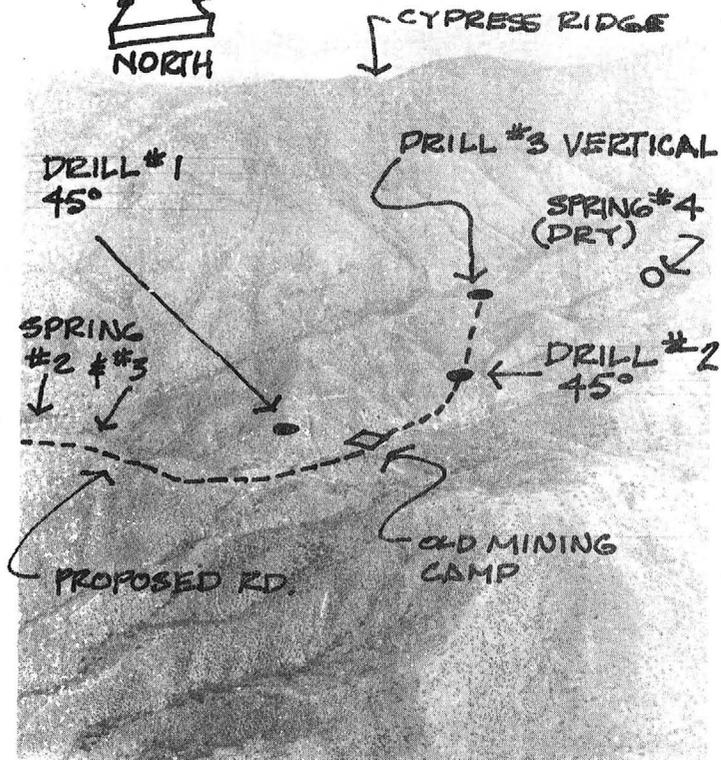
Mr. Charles P. Cobeen
3555 W. Augusta Avenue
Phoenix, Arizona 85021

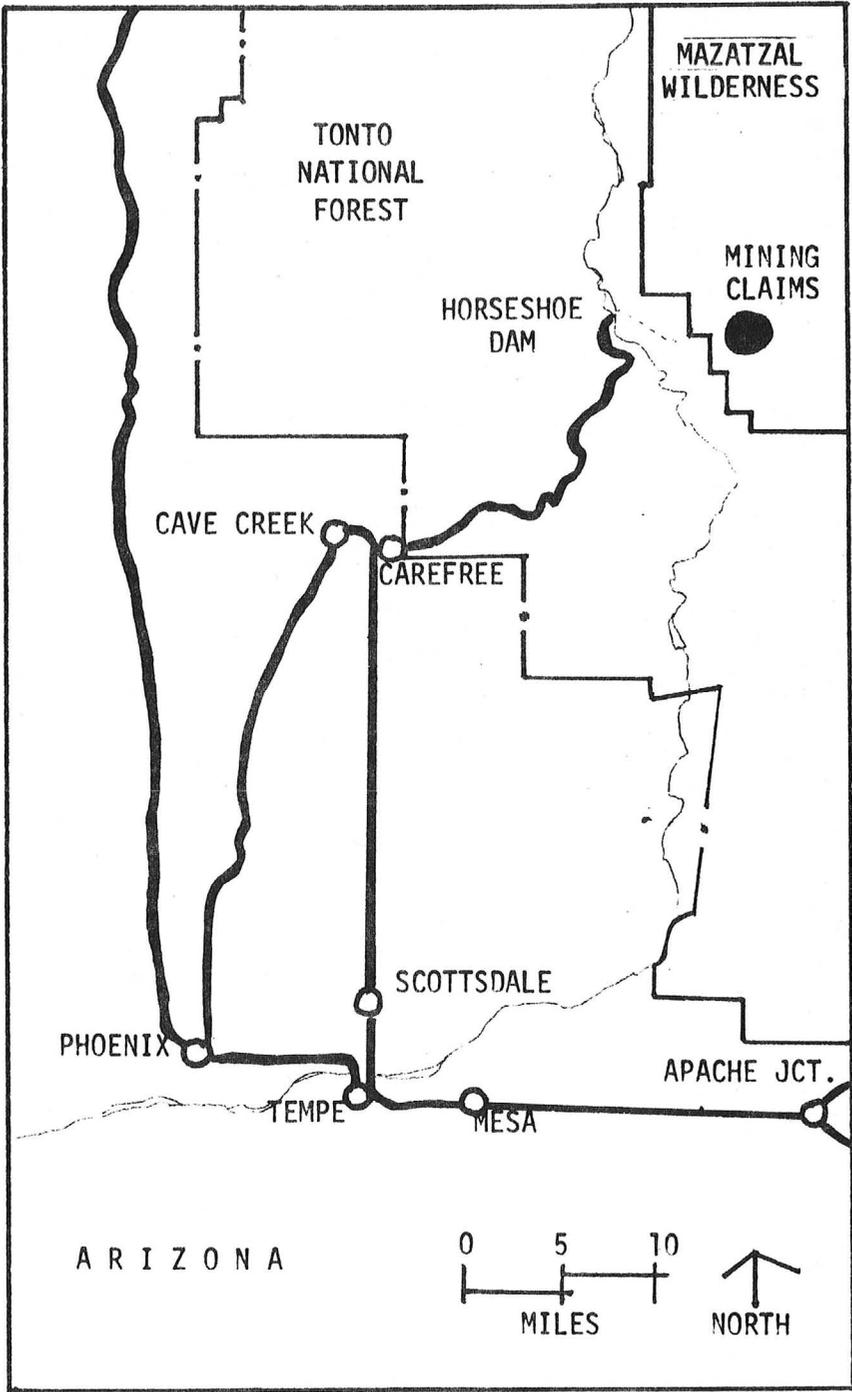
Mr. Michael Grieg
c/o Chronicle Newspaper
905 Mission
San Francisco, California 94103

NORTH

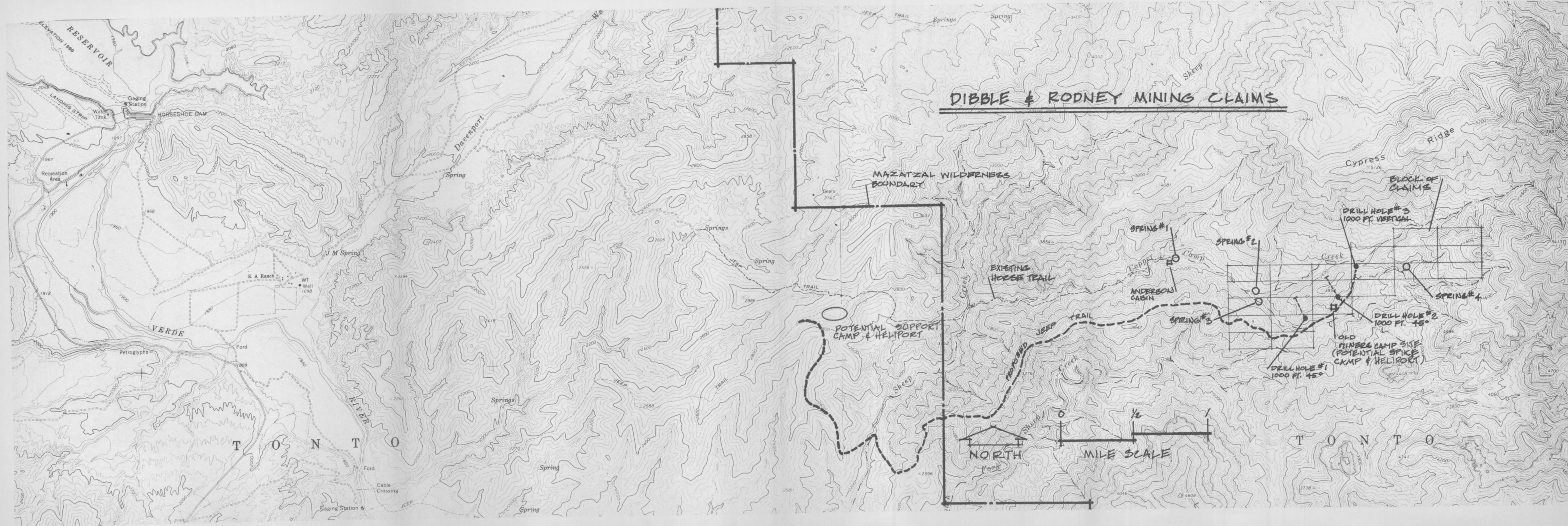


NORTH





LOCATION MAP



DIBBLE & RODNEY MINING CLAIMS

MAZATZAL WILDERNESS
BOUNDARY

BLOCK OF
CLAIMS

EXISTING
HORSE TRAIL

SPRING #1

SPRING #2

DRILL HOLE #3
1000 FT. VERTICAL

DRILL HOLE #2
1000 FT. 15°

DRILL HOLE #1
1000 FT. 45°

POTENTIAL
SUPPORT
CAMP & HELIPORT

SPRING #3

OLD MINERS CAMP SITE
(POTENTIAL SPIKE
CAMP & HELIPORT)

NORTH

MILE SCALE

T O N T O



ARIZONA WILDLIFE FEDERATION

P.O. Box 1769 • Phoenix, Arizona 85001 • Phone 602-253-4903

October 30, 1972

Mr. Fred Wirth, Supervisor
TONTO NATIONAL FOREST
Room 6208 - Federal Building
230 North First Avenue
Phoenix, Arizona 85025

Dear Mr. Wirth:

Please enter the following comments in the final environmental statement concerning a mineral exploration proposal in the Mazatzal Wilderness, Tonto National Forest.

The Arizona Wildlife Federation believes that the American wilderness is a diminishing and threatened resource, existing only in remnants protected until now by their inaccessibility and remoteness from streams of commercial activity. Wilderness yields certain unique values to mankind. These values are destined to grow in importance with, and in direct proportion to, the very pressures of human population and expanding industrial development that threaten to destroy them.

For these reasons the AWF does not believe the proposed mineral exploration in the Mazatzal Wilderness Area should be allowed. Alternative #1, do no mineral exploratory work, is the only action compatible with wilderness.

We fully understand the exceptions written into the Wilderness Act by Mr. Wayne Aspinall and associates and are in hopes that these will soon be revised.

Of the other six alternatives listed, the AWF prefers Alternative #2, transport personnel, equipment and supplies by horses and/or mules over existing trails, over Alternative #3, transport drilling rigs, personnel, equipment and supplies to the site by helicopter, because less disturbance to the area would result. Problems to the miners are not insoluble when using only pack animals.

We prefer Alternative #4, supply water from a source outside the wilderness, to Alternative #5, supply water from springs located within the wilderness, because there is a lesser chance of disrupting

Mr. Fred Wirth

-2-

October 30, 1972

the ecological balance of the downstream riparian vegetation when water is brought into the area.

We also believe Alternative #6, develop a support camp outside the wilderness area, is more compatible with the Mazatzal Area than Alternative #7, develop a support camp within the wilderness. An outside camp would not leave the area as disturbed as an inside camp.

The AWF cannot agree to a road being cut into the Mazatzal Wilderness Area. A road would be in direct conflict with the long-term use this area was set aside for. Sacrificing this long-term use for short-term mineral exploration is not at all justified.

We would like all disturbance, direct or indirect, to be restored to the fullest extent as the miners leave the area. The funds for this restoration should come from the miners, not the Forest Service budget.

Wilderness is a way for the present generation to pass a portion of the public lands in the United States on to the next generation in as untouched a condition as possible. Mineral exploration with a bulldozed road, water "development" and support camps are not the intent of wilderness classification.

Thank you for including the Arizona Wildlife Federation in this impact statement's public comments.

Sincerely,



Richard L. Small,
Executive Secretary
ARIZONA WILDLIFE FEDERATION

RLS:is

cc: Morris K. Udall



National Wildlife Federation

1412 16TH ST., N.W., WASHINGTON, D.C. 20036

Phone: 202-483-1511

Oct. 3, 1972

Forest Supervisor Fred J. Wirth
Tonto National Forest
230 N. First Ave., Rm. 6428
Phoenix, Ariz. 85205

Dear Mr. Wirth,

I would like to present the following comments for the record concerning the final environmental impact statement on the "Mineral Exploration Proposal, Mazatzal Wilderness".

The draft environmental statement presented the proposition is sufficient clarity to make a clear choice involving a combination of alternatives 3,4 and 6. I believe that the actions permitted by these options would provide meaningful protection to the Wilderness resource while giving adequate consideration to the economics factors.

Yours in Conservation,

A handwritten signature in cursive script, appearing to read "Fred J. Wirth".

National Wildlife Federation

1412 16TH ST., N.W., WASHINGTON, D.C. 20036

Phone: 202-483-1111

November 7, 1972

William D. Hurst
Regional Forester, Southwestern Region
Forest Service
U. S. Department of Agriculture
New Federal Bldg.
517 Gold Avenue
Albuquerque, New Mexico 87101

Dear Mr. Hurst:

We have received a copy of the draft environmental impact statement concerning proposed mineral exploration in the Mazatzal Wilderness of Tonto National Forest. The impact statement contains an adequate catalogue of proposed action and alternatives, but contains inadequate information for a reader or decisionmaker to reach a conclusion as to the comparative impacts of the feasible project alternatives. As the courts and the President's Council on Environmental Quality have made abundantly clear, NEPA requires a full balancing of the proposed project's reasonable alternatives with sufficient detail on the comparative costs and benefits of these approaches to allow for an informed decision.

It would appear from the statement that at least two alternatives mentioned -- those of helicopter transport and of alternative water supply -- are highly feasible and could prove to be the most logical means of reconciling the wilderness character of the terrain with legitimate mineral exploration. The problem is that there is not enough data on the relative costs of these approaches, compared to the costs of building a road and obtaining water as planned. Without this data we know that building a road is bad and using helicopter is less bad, but we don't know the degree of this difference and what it will mean to the legitimate interests in developing mineral resources.

In sum, the draft environmental statement is a good beginning. We request that a supplement to this draft be circulated for public review and comment which includes adequate cost comparisons on the most feasible alternatives you have

Mr. William D. Hurs
November 7, 1972
Page Two

described. It is important that this material be circulated in draft form to allow for other agencies and public contribution before the statement is put in final form. We look forward to receipt of this supplemental material and to making our contribution to your decision on a more informed basis.

With best regards, I am

Sincerely,



Oliver A. Houck
Counsel

cc: Arizona Wildlife Federation
Tom M. Kilpatrick, Wilderness Chairman

Arizona Game and Fish Department
Robert A. Jantzen, Director

The Wildlife Society, Arizona Chapter
Richard C. Endress, President

Office of the Board of Supervisors
Maricopa County
Henry H. Haws, Chairman

Grazing Advisory Board
Tonto National Forest
Stephen L. Bixby, Chairman

Salt River Project
H. Shipley, Associate General Manager

The Arizona Republic
Ben Avery

Office of State Land Department
Andrew L. Bettwy

Advisory Commission on Arizona Environment
F. J. MacDonald, Chairman

Sierra Club, Southwest Office
James A. McComb, Southwest Representative

Mr. William D. Hurst
November 7, 1972
Page Three

cc: Tucson Wildlife Unlimited, Inc.
Mrs. Gennette Stewart, President

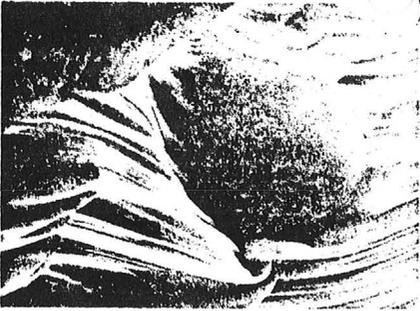
The Wilderness Society, Western Regional Office
Clifton R. Merritt, Director of Field Services

Tucson Audubon Society, Wilderness Committee
Mrs. Joan Coston

Thomas L. Kimball, Executive Vice President
National Wildlife Federation

Louis S. Clapper, Conservation Director
National Wildlife Federation

Kenneth Hampton, Conservation Liaison
National Wildlife Federation



Sandstone Sculpture, Peach Wash, Arizona

SIERRA CLUB *Southwest Office*

2014 East Broadway, Room 212, Tucson, Arizona 85719

October 24, 1972

Fred J. Wirth, Supervisor
Tonto National Forest
230 North First Avenue, Room 6208
Phoenix, Arizona 85025

Dear Mr. Wirth:

Thank you for sending me a copy of the draft environmental statement concerning a proposal for mineral exploration in the Mazatzal Wilderness. In general, I believe that the statement fairly depicts the environmental consequences of the proposed mining operation and with two exceptions I will not attempt to comment on it in detail.

The statement on the bottom of page 21 to the effect that "However, should a marketable body of ore be discovered as a result of the proposed exploration, thousands of Americans will benefit from the resultant copper products" is highly conjectural, and is based on the premise that unless this particular area is developed as a mine, then there will be a shortage of copper. I would suggest that the sentence referred to above be deleted.

On page 27 under "Irreversible and Irretrievable Commitments of Resources", the second paragraph states that if the proposed action showed evidence that the mineral resource was not of great enough economic potential then this area would be safeguarded from future exploratory work. This statement is only true if the information gathered by the applicants is made available to the public. Unless this is done, some future applicant could claim that the present applicants did not know what they were doing or alternatively that conditions have changed.

In spite of the limitations imposed by our antiquated mining laws, the Forest Service does have some authority over the proposed operation. Examples are the Wilderness Act provisions which grant authority to regulate ingress and egress as well as to require reclamation of the lands. They can have a very significant impact on the attractiveness to the applicant of the proposed activity.

Fred J. Wirth
October 20, 1972
page two

The reclamation provision is particularly important. The authority here is very clear. If any exploration does take place then it should be done with a requirement and sufficient bond to insure that the Mazatzal Wilderness is "unimpaired for future use and enjoyment as wilderness and so as to provide for the preservation of its wilderness character." The quoted words are from Section 251.83 of the Department of Agriculture Regulations on the Administration and Use of National Forest Wilderness.

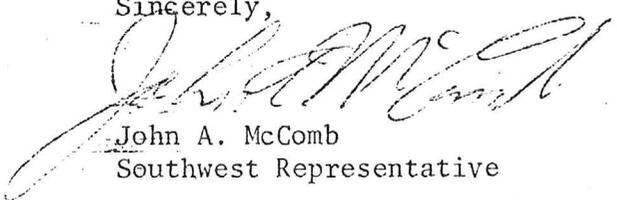
I believe that you should also include in the environmental impact statement, a determination as to whether or not the proposed activity is in the national interest. Although such a determination may not be legally required, nevertheless it would be of great value in illuminating the weaknesses in our existing mining laws. Only by adequately informing the public about the many shortcomings of our mining laws, will any change come about. Clearly that could be one of the more important contributions of environmental impact statements on proposals such as the present one.

Lastly, it is obvious from the information contained in the draft environmental statement that the use of helicopters instead of roads would significantly reduce the environmental impact of the proposed activity. If the application is granted then it should mandate the use of helicopters.

I am certain that you do not expect the Sierra Club or any other organization concerned with preservation of wilderness to welcome the proposed activity. Neither should the Forest Service welcome them, and we expect you to oppose all such incursions, no matter how minor, to the maximum extent possible. Incidentally, I believe you are doing good work in this regard.

I appreciate your efforts to publicize the proposed activity. Please keep me informed of further activities regarding this proposed application.

Sincerely,



John A. McComb
Southwest Representative

JAM:ab

cc: Steve Johnson
Michael McCloskey
Joan Coston
Peggy Spaw
Brian McCarthy
Pat Vivian
Clifton Merritt
Doug Scott
Neil Carmony

Governor
JACK WILLIAMS

Commissioners
HOMER L. G. KRYGER, Chairman, Yuma
MILTON G. EVANS, Flagstaff
ROBERT J. SPILLMAN, Phoenix
GLEN D. DALY, Winslow
CHARLES F. ROBERTS, O.D., Bisbee

Director
ROBERT A. JANTZEN



Asst. Director, Operations
PHIL M. COSPER

Asst. Director, Services
ROGER J. GRUENEWALD

ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

October 18, 1972

Mr. Fred J. Wirth, Supervisor
Tonto National Forest
230 North First Avenue, Room 6208
Phoenix, Arizona 85025

Dear Mr. Wirth:

We just completed a review of your Draft Environmental Statement concerning mineral exploration in the Mazatzal Wilderness, Tonto National Forest, and were very impressed with the comprehensive and objective treatment of the proposal.

We are still of the opinion there will be significant and permanent wildlife losses and environmental degradation with the project. However, the existing mining law permits this type action which is incompatible with wilderness management, and we recognize you have no alternative but to issue a permit.

We appreciate the opportunity to comment on the draft statement and the close coordination maintained by your agency through the evaluation stage of this project.

Sincerely,

Robert A. Jantzen, Director

A handwritten signature in dark ink, appearing to read 'Robert D. Curtis'. The signature is written in a cursive style and is positioned above the typed name 'Robert D. Curtis, Chief'.

By: Robert D. Curtis, Chief
Wildlife Planning & Development Division

RDC:iw

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

Room 6029 Federal Building, Phoenix, Arizona 85025

October 31, 1972

Fred J. Wirth, Forest Supervisor
Tonto National Forest
Room 6428 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

Dear Fred:

The draft environmental impact statement concerning a mineral exploration proposal in the Mazatzal Wilderness in Maricopa County has been reviewed by my staff.

The impacts of the proposed action relating to soil and water conservation and the environment have been adequately considered.

We appreciate the opportunity to review and comment on this proposed project.

Sincerely,



George C. Marks
State Conservationist



UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

Room 6029 Federal Building, Phoenix, Arizona 85025

October 31, 1972

Fred J. Wirth, Forest Supervisor
Tonto National Forest
Room 6428 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

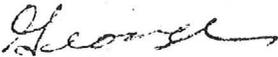
Dear Fred:

The draft environmental impact statement concerning a mineral exploration proposal in the Mazatzal Wilderness in Maricopa County has been reviewed by my staff.

The impacts of the proposed action relating to soil and water conservation and the environment have been adequately considered.

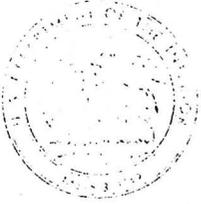
We appreciate the opportunity to review and comment on this proposed project.

Sincerely,



George C. Marks
State Conservationist





United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

FEB 5 1973

ER 72/1161

Dear Mr. Hurst:

Reference is made to your letter of September 26, 1972, requesting review and comment on the Draft Environmental Statement of a Mineral Exploration proposed in Mazatzal Wilderness, Tonto National Forest, Arizona. We believe that this is the first environmental statement prepared by the Forest Service concerning mineral exploration on mining claims within a national wilderness area; the significance of any action taken in this case could apply to other wilderness areas.

The draft statement lacks sufficient information and depth in describing the project, the existing environment, impacts and alternatives. The attributes that led to the inclusion of this area into the National Wilderness Preservation System should be explained, as well as the interrelationships between living and non-living components of the environment. Also, we believe the authorities which the Forest Service has to work under should be briefly explained.

The statement has not considered the environmental impacts associated with mineral extraction. This may follow the proposed action and thus should be evaluated in accordance with CEQ guidelines. This evaluation should not only consider the primary aspects, extracting the minerals - open pit or shaft; processing plant, storage areas, roads, etc., but the secondary impacts as well, e.g., power needs, transportation, water requirements, human associated requirements; new towns, sewage disposal, etc. These impacts should be related to the wilderness area.

The statement on page 20 that "There are no inventoried historical or archeological sites in the claims area." and that ". . . in the event of any major development an archeological survey would be in the public interest . . ."

do not meet the requirements of the National Environmental Policy Act of 1969 or the Council on Environmental Quality Guidelines that factual data on environmental impacts be available to decision makers prior to authorization. Archeological or historic remains are a fragile, limited, non-renewable portion of the total environment. The statement should indicate a professional determination as to presence or absence of these remains. Direct or indirect effects of the proposal on any archeological or historic values present should be discussed.

The statement mentions mining activities earlier in the century in the project area. Would these earlier activities have any historical significance?

The draft environmental statement should reflect consultation with the National Register of Historic Places. The final statement should indicate consultation with the State Liaison Officer for Historic Preservation and a copy of his comments should be appended. Also, as the land is under jurisdiction of a Federal agency, the statement should indicate what steps were taken to comply with Executive Order 11593 of May 13, 1971.

The draft statement indicates "sufficient evidence of a fairly wide zone of low grade carbonate copper to justify drilling a few diamond drill holes to check for possible existence of underlying secondary enriched ores." In view of the importance of this action it should be supported in considerably more detail; more information as to mineralization, geology and previous operation is needed. There is a brief reference to shafts and their workings in the area. The statement appears to raise a question as to whether further work is actually warranted but comes to no firm conclusion regarding this.

There should be more quantitative discussion as to the size of the areas that will be disturbed by preparation of drilling sites, the amounts of water that would be needed for drilling, and the amounts of water available from the various sources such as springs and seeps that are described. Also, a map of adequate scale should be included showing the project area in relation to the wilderness area. No mention of plugging the drill holes is made. An unplugged hole may widen due to sloughing and erosion if it is drilled in soil, forming a trap for animals and campers. Some type of plug for the holes should be required. Returning the sludge from the 55-gallon drums to the holes might be suggested to prevent downhole sloughing and saving numerous trips to other dumping areas.

The alternatives are related primarily to how men and equipment will get to the site and where their water will come from. The environmental impacts of these alternatives have not been explored nor are they adequate. The statement should indicate what would be "reasonable" ingress and egress and definitively weigh the environmental impact of alternatives. The Alternatives Section has not discussed the possibilities of alternative ore supplies elsewhere in the country or the environmental cost associated with their extraction.

The "do nothing" alternative should be expanded to reflect the intent of the National Environmental Policy Act and subsequent guidelines. Alternatives such as denial of the permit, seeking legislation to close this area and/or all wilderness areas to mining claims and consideration of segregation and condemnation proceedings need to be considered. Also alternatives such as declassification of this wilderness area, various alternative stipulations concerning ingress or egress, additions to the wilderness boundaries to compensate for lands lost, etc., could be included.

More emphasis could be given to possible mitigating measures such as adequate stipulations or agreements for prevention of erosion, proper location and engineering of roads and drill sites, disposal of cuttings and sludge from the drilling, and minimal areas of disturbance. Provision could be made for restoring the disturbed areas insofar as is possible at conclusion of operations if exploration does not reveal a mineable mineral deposit.

The statement is not clear in regard to light visitor use (P. 15) and how it has increased by 50 percent over the past 10 years. It is inferred that most of this visitation is State-oriented because it is stated that "this trend will continue with the growth of the State population." Is this true?

Finally, there are several statements which need clarification:

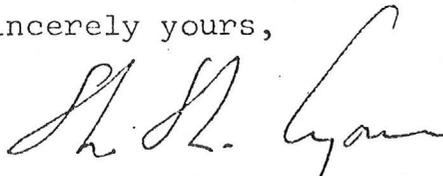
Page 7, "under the existing United States mining laws, the use of the land for mineral location and development within the wilderness may continue until December 31, 1983." This is a specific provision of the Wilderness Act rather than the Mining Law. Also, any prior valid claims within wilderness areas remain open to development after 1983.

Page 20, "It will have to be decided whether a mineral resource or a wilderness resource can do the greatest good for the most people over the long run." The decision is whether or not the Forest Service should grant a permit and, if granted, what conditions or stipulations will be imposed to cause the least possible impacts upon the wilderness area. Also, some mitigation of effects may be possible and should be considered.

Page 27, "On the other hand, if the proposed action showed evidence that the mineral resource was not of great enough economic potential, there would be sufficient evidence to prevent further exploratory work." (Emphasis added.) A more correct statement would be that this might tend to discourage further exploratory work. The prospect could be a "teaser" and undergo several exploration programs before being abandoned or mined.

We appreciate the extended time given for review purposes.

Sincerely yours,



Deputy Assistant Secretary of the Interior

Mr. William D. Hurst
Regional Forester
U.S. Department of Agriculture
517 Gold, S.W.
Albuquerque, New Mexico 87101



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

100 CALIFORNIA STREET
SAN FRANCISCO, CALIFORNIA 94111

NOV 27 1972

Fred J. Wirth, Forest Supervisor
Tonto National Forest
230 North First Avenue, Room 6428
Phoenix AZ 85025

Dear Mr. Wirth:

We are replying to your letter of September 26, 1972 requesting our review and comment on the Draft Environmental Statement for the Mineral Exploration Proposal in the Mazatzal Wilderness, Tonto National Forest, Arizona.

The statement clearly points out the basic conflict between wilderness preservation and the proposed mineral exploration project and indicates most of the adverse effects of each of the alternatives regarding access to the claims area. The Environmental Protection Agency shares the Forest Service's concern for the establishment of rules and regulations governing ingress and egress to minimize the serious adverse environmental effects which will be caused by the proposed exploration activity.

The Environmental Protection Agency feels that alternative 3 will have the least long term adverse environmental effects and we urge the Forest Service to select that alternative. Furthermore, we recommend that the helicopters be used only for the transport of the heavy equipment and supplies and that all other access be restricted to foot or horseback. This modified alternative 3 would reduce the number of helicopter trips into the wilderness area and would minimize the effects of noise on the resident wildlife. We would appreciate receiving a copy of your final statement.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul De Falco, Jr.", written in dark ink.

Paul De Falco, Jr.
Regional Administrator

October 4, 1972

Mr. William D. Hurst
Regional Forester
Region III, Forest Service
U. S. Department of Agriculture
517 Gold Avenue, S.W.
Albuquerque, New Mexico 87101

Dear Bill:

ADVISORY COMMISSION ON ARIZONA ENVIRONMENT 206 S. 17 Ave. Phoenix Arizona 85007 261-7322

I have your draft environmental statement concerning mineral exploration in the Mazatzal Wilderness Area. I am forwarding this to the Chairman of our Land Resources and Ecology Committee for comment.

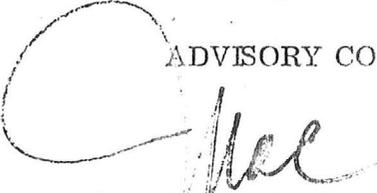
However, I think that, from my knowledge of the Commission and the stands it has taken in the past on various environmental matters, I can probably give you an idea of the general reaction of the group: (1) The Advisory Commission on Arizona Environment generally opposes any intrusion on wilderness areas; (2) the Commission is generally opposed to any activities which have any lasting impact on forest lands, such as erosion, etc; and (3) the Commission is generally opposed to any pollution-producing activity on forest lands, especially wilderness areas.

I realize that federal law permits mining exploration in wilderness areas until 1983; however, this does not, in my opinion, permit anything to be done unless it is carried out most carefully. Thus, it would seem that the only acceptable exploration that could be done in the Mazatzals would have to be by helicopter, and the total area would have to be returned to its natural state immediately after exploration. If an ore body is found, this will result in a serious environmental loss to the wilderness area, even though the economic value of it to the country could be considerable and may be a good trade-off. On the other hand, if a good ore body is not found, then destruction of any part of the wilderness area would be inexcusable.

As I said, Bill, this is not the official position of the Commission, but it will give you an indication of the way things have been going in the past. We will forward comment to you as soon as it is generated.

Best regards,

ADVISORY COMMISSION ON ARIZONA ENVIRONMENT


F. J. MacDonald
Chairman

NORTHWESTERN UNIVERSITY

COLLEGE OF ARTS AND SCIENCES

EVANSTON, ILLINOIS 60201

DEPARTMENT OF POLITICAL SCIENCE

October 24, 1972

Mr. Fred J. Wirth
Forest Supervisor, Tonto National Forest
230 North First Avenue
Phoenix, Arizona 85025

In re: DEIS on Mineral Exploration
Proposal in Mazatzal
Wilderness

Dear Mr. Wirth:

I believe the procedures you have followed in preparing the draft environmental impact statement on the mineral exploration proposal of Messrs, Rodney and Dibble, on the Mazatzal Wilderness, are fundamentally in error. I believe that they are not in accordance with either the National Environmental Policy Act, the guidelines of the CEQ, or Section 1940 of the Forest Service Manual.

What you have done, in this DEIS, is to take the Rodney-Dibble proposal as the activity for which you have prepared this analysis. Then you have listed as "alternatives," a number of partially explained, and unintegrated options which might be exercised, presumably by the Forest Service, acting on behalf of the Secretary of Agriculture, to make reasonable regulations governing ingress and egress. That procedure is inappropriate and in error. NEPA, the CEQ guidelines, and Section 1940 all require impact statements for major proposed actions of the agency, rather than of some permittee or seeker of a special use privilege. The action requiring discussion and analysis should be your proposed response to the mineral exploration proposal of Rodney and Dibble. Nor can you simply set up the Rodney-Dibble proposal as a "straw man" to which you list a series of possible alternatives. What is clearly called for is an explicit proposal, which will encompass the ways in which the Forest Service would reasonably regulate ingress and egress, and otherwise preserve and maintain the environment, given the legal authority under which you operate. The present DEIS indicates that you have sufficient information on hand to make such a proposal at this time. It is absolutely vital that agency and other commentators be able to address their comments to the specific governmental proposal. But under the procedures you have followed, you will receive comments on the DEIS concerning the Rodney-Dibble proposal, and will then fashion a Forest Service policy, in the final EIS, or otherwise, which itself has not been subjected to the inter-agency and outside scrutiny which is envisioned in NEPA. That consequence will be just as inappropriate as is the DEIS addressed to the Rodney-Dibble proposal.

I Let me be explicit about the legal requirements by which you are bound. The language of the National Environmental Policy Act is quite unambiguous. Impact statements are required for "major Federal actions significantly affecting the quality of the human environment." The language of the CEQ is also explicit in referring to "federal action."

Section 1940 . 1 of the Forest Service Manual reads:

October 24, 1972

"Section 102 (2) (c) of the Act requires environmental statements on proposed major Federal actions affecting the environment. The objective of this section is to build into a decisionmaking process an appropriate and careful consideration of the environmental aspects of the proposed action, and to assist agencies in implementing not only the letter, but the spirit of the Act."

The Forest Service Manual further states (1942-2)

(1) Description. The proposed action or alternative should be clearly described by including enough information and technical data to give a reader a clear understanding of the nature of the proposed action."

Those legislative and administrative guidelines are not complied with in the DEIS on the Rodney-Dibble proposal. Nor can these omissions be corrected by putting this statement into proper form in the final EIS. As you may have noted, the Third Annual Report of the CEQ (1972) discussed impact statement procedures. That report indicates that when a new issue needs to be discussed, following comments, a revised draft should be circulated. That same report says that a DEIS should be in enough explicit detail to be a complete plan of action. To quote the report, "In short, a draft statement should be capable of serving as the final, or 'detailed' statement if no comments come back."

The present statement does not suffice as a clear, detailed statement of the proposed Forest Service action, in response to the private efforts to develop a mining operation on the Mazatzal Wilderness.

I might have other, more substantive comments about this event, later on. For example, I believe that NEPA, in addition to requiring an impact statement under section 102, also amounts to a general grant of authority to agencies to regulate activities within their domain, so as to reduce or eliminate environmental damage, to the fullest extent practicable. Thus, I believe, you have the legal authority (and duty) to require far more environmental safeguards of a mining operation on this Wilderness than simply reasonable regulations of ingress and egress. But detailed comment on such points is really premature. It should follow receipt of a revised DEIS, which deals with a proposed federal action, and its alternatives, in a clear and detailed manner.

If you do follow my comments and prepare a revised draft, I hope and suggest that you include some legal opinion on the water question, along with a detailed analysis of its environmental costs, etc. If the Secretary of Agriculture has published any general regulations concerning ingress and egress to wilderness areas, they definitely need to be included, as well.

If you do not plan to follow my comment, and prepare a revised draft, I would like to appeal that decision, as soon as possible. As I have indicated, your present draft seems to be a violation of the Forest Service manual (in addition to the CEQ guidelines, and NEPA). Therefore, it seems to me that the way to proceed in seeking a remedy is to appeal this question, to the appropriate Forest Service body, to seek an administrative adjudication or ruling. If this letter itself does not serve to activate that appeal, would you please tell me the proper procedures.

Fred Wirth

October 24, 1972

If you decide to not prepare a revised DEIS, I believe it would be appropriate for you to stay the preparation of a final EIS until this issue is properly disposed.

I am sorry if this response causes you some problems. I do not mean it to be hostile, or angry, at all. But NEPA is still new, and it is really quite important that these procedural issues get ironed out, for they do have substantive policy consequences. Our group has commented upon a number of Forest Service (and other agency) EIS's, and read many more, which we did not comment upon. But with only two exceptions, this is the only one we can recall in which an agency took an outside proposal as the "action," rather than an agency proposal. Usually, if there is an outside proposal for a transmission line, ski area, mineral proposal, etc. the DEIS addresses itself to the agency response. The only two exceptions which come to mind are both from your region of the Forest Service - the proposed land transfers to the Cochiti and Mescalero Apache Tribes. But in those two instances, the tribal proposals were examined as if there were only two alternatives: accepting the proposal, or rejecting it. So the problem, as we have outlined it in this comment, simply did not appear. The Forest Service could prepare their statements as if they were extensive comments on the Indian proposals, rather than a statement of a Forest Service proposal. That is definitely not the situation in this case.

Thank you very much for your attention.'

Sincerely,



H. Paul Friesema
Associate Professor of Political
Science and Urban Affairs

HPF:ls

Address:

H. Paul Friesema
Public Lands Policy Project
Center for Urban Affairs
Northwestern University
2040 Sheridan Road
Evanston, Illinois 60201

P. S. As a further suggestion, in revision of this DEIS, and in further impact statements, when you have received written comments and recommendations about a proposal, prior to preparing a draft, it would be highly desirable to reproduce the letters in the draft. Your count of favorable v.s. unfavorable responses is really of no use in providing detailed input into this process. After all, the whole 102 requirement concerns environmental analyses. It does not require any popularity polls on proposals. But subsequent commentators on the DEIS would be greatly helped with the reproduction of the entire comment. This is the procedure of the Corps of Engineers, when they have circulated a preliminary proposal, and it is very useful.

Tonto National Forest
230 North First Avenue
Phoenix, Arizona

2820

Dr. H. Paul Friesema
Public Lands Policy Project
Center for Urban Affairs
Northwestern University
2040 Sheridan Road
Evanston, Illinois 60201

Dear Dr. Friesema:

Thank you very much for your thought-provoking comments concerning the draft environmental statement on the mineral exploration proposal in the Mazatzal Wilderness.

The real issue here is the type of ingress and egress granted to Mr. Rodney and Mr. Dibble. Therefore, we are, in effect, discussing a Federal action granting this permit. Forest Service Manual 1941.22 states, "Environmental statements will be prepared on major proposed plans, programs, and major projects directly undertaken by the Forest Service or supported in whole or in part through land use permits, leases, contracts, grants,"

We believe it is appropriate to consider the application as a proposal in the environmental statement. Modification of the proposal which may result will depend upon feasibility of alternatives that will be considered in the draft statement. In some instances where the applicants' proposal is not determined to be worthy of consideration, it may be included as one alternative rather than the proposal itself. In this case, we do not consider the applicants' proposal a "straw man" to be disposed of. It may well be the most acceptable means for providing access after economic and environmental factors are analyzed. In either case, we believe it is important that agencies, organizations, and individuals reviewing draft environmental statements need to be fully informed of the applicants' proposal. We see little difference in using the applicants' proposal, identified as such, versus using it unidentified as a proposal or alternative in considering the most logical method for providing access to the claims. After consideration of all possible alternatives, the best proposal will be cast up in the final statement regardless of how they are compared in the draft.

I am sure you would agree, if we are to get meaningful public input, the draft environmental statement should not be a decision document.

The authority for mining in the National Forest Wildernesses is the Wilderness Act of September 3, 1964 (Public Law 88-577), and the Code of Federal Regulations (Title 36, Chapter II).

The use of a helicopter or other form of mechanized transportation or mechanized equipment of any kind in conjunction with a mining claim must be shown to be essential to the exploration of a claim, provided the mineral showing and/or geological information within the claim is such that there is a reasonable chance that a valuable mineral deposit will be discovered. The use of mechanical transportation or equipment is not permissible if the only reason is that such use is more economic than hand methods. A permit from the Forest Service is required.

Under the provisions of the mining laws and Wilderness Act, Rodney and Dibble are entitled to appropriate access to their claim if mineral indications are such that it is reasonable to expect that further work will demonstrate the validity of the claim. Forest Service mining engineers have determined that there is sufficient mineral potential to justify further exploration that would require drilling with heavy drilling rigs. The question then comes as to how to provide this ingress and egress while safeguarding the National Forest resources including wilderness values consistent with the use of the land for mineral location and exploration, including, where essential, the use of mechanical transport, aircraft, or motorized equipment.

It is our intention to allow other concerned Federal agencies and the public an opportunity to comment on this proposal and alternatives prior to the issuance of a final statement. Your comments concerning the legal opinion on the water question are appreciated and will be taken into consideration in preparation of the final environmental statement. In regard to your comments concerning appeal, the contents of and procedure used in the preparation of a draft environmental statement to get public input on a proposal are not appealable.

Again, we thank you for your review of the draft environmental statement and assure you your letter will be made a part of the record along with others received.

Sincerely,

Fred J. Wirth

FRED J. WIRTH
Forest Supervisor

Blamb/tac

[Handwritten initials]

NORTHWESTERN UNIVERSITY

COLLEGE OF ARTS AND SCIENCES

EVANSTON, ILLINOIS 60201

DEPARTMENT OF POLITICAL SCIENCE

December 13, 1972

Mr. Fred J. Wirth
Forest Supervisor, Tonto National Forest
230 North First Avenue
Phoenix, Arizona 85025

In re: DEIS on Mineral Exploration
Proposal in Mazatzal Wilderness

Dear Mr. Wirth:

Thank you for your reply to my earlier comments on the Mazatzal Wilderness mineral exploration proposal. Your letter may serve to narrow our points of disagreement. You will recall that I thought that it was inappropriate for you to simply list a series of alternatives which largely amounted to Mitigating measures you might, somehow, require of the mineral explore\$. I asserted that you should prepare what amounted to a draft response--your tentative decision on what you intended to require as conditions for granting the sought permit. I asserted "It is absolutely vital that agency and other commentators be able to address their comments to the specific governmental proposal."

You seem to clarify our disagreement rather well when you write "After consideration of all possible alternatives, the best proposal will be cast up in the final statement regardless of how they are compared in the draft. I am sure you would agree, if we are to get meaningful public input, the draft environmental statement should not be a decision document."

The draft environmental impact statement should, in my view, be a tentative decision document--subject to alternation, or even abandonment, depending upon the comments recieved. But it should reflect the tentative plan of the agency. As the present DEIS is constructed, this is not done.

Let me call your attention to the third annual report of the CEQ, whose rules and regulations regarding NEPA are binding upon the Forest Service. The Third Annual Report (1972) says, quite explicitly, that a DEIS should be complete enough, ¹⁹⁷² in itself, to serve as a decision document. To quote that report, "By the time it circulates a draft, the initiating agency should have fully explored those points, with help from other sources when necessary, rather than leaving parts of the analysis to be furnished by commenting groups. In short, a draft statement should be capable of serving as the final or "detailed" statement if no comments come back" (page 238). I do not believe that report was available, at the time of my earlier comments, nor certainly during the preparation of the Mazatzal mineral proposal DEIS. But now it is available.

It seems to me, upon the basis of the CEQ interpretation that you are essentially mistaken in your procedures with this DEIS. May I suggest that you take the comments recieved, to date, on this proposal, prepare your decision document, as you had planned, and then recirculate that statement as a revised draft environmental

Mr. Fred J. Wirth

December 13, 1972

impact statement. The benefits would be a closer consideration of this issue, and compliance with the CEQ guidelines on NEPA. The only costs would be a time delay. The minerals will not go away, so the delay seems warranted. Thank you for your attention, and warm personal regards.

Sincerely,



H. Paul Friesema
Associate Professor of Political
Science and Urban Affairs

HPF:ls

Address:

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January 22, 1973

Air Mail - Special Delivery

Mr. Fred J. Wirth
Forest Supervisor,
Tonto National Forest
230 North First Avenue
Phoenix, Arizona 85025

In re: DEIS on Mineral
Exploration Proposal
in Mazatzal Wilderness

Dear Mr. Wirth:

This is some further correspondence concerning the Rodney-Dibble proposal for mineral exploration in the Mazatzal Wilderness. You will recall that we are a commenting group on the DEIS, submitting a letter on October 24, 1972, and another on December 13 (the latter in response to your reply to our first letter).

We noted, in yesterday's New York Times, a news story about a federal court decision concerning a mining proposal in the Boundary Waters Canoe Area -- a wilderness area administered by the Forest Service, which seems to prohibit such efforts as the Rodney-Dibble effort. It seems, on the basis of the news story, to amount to an interpretation of the Wilderness Act which is significantly different than your own, as expressed in the letter of November 21 to me (which reflects, of course, the standard USFS interpretation).

In any case, because we thought that further action in re the Rodney-Dibble matter might be forthcoming sometime soon, it would be appropriate to call your attention to the matter immediately, so that you could stop proceedings in this matter, until the interpretation in this case is clear, and perhaps permanently. We enclose a xeroxed copy of the New York Times article.

Best wishes.

Sincerely,

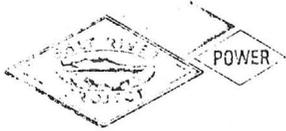


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SALT RIVER PROJECT

P.O. BOX 1986
PHOENIX, ARIZONA 85001



November 1, 1972

Mr. Fred J. Wirth, Supervisor
Tonto National Forest
230 North First Avenue, Room 6428
Phoenix, AZ 85025

Dear Mr. Wirth:

We appreciated receiving a copy of A Draft Environmental Statement Concerning: A Mineral Exploration Proposal in the Mazatzal Wilderness, Tonto National Forest for our review and comment.

According to the draft statement, the water required by the proposed mineral exploration is to be withdrawn from a number of so-called "springs" arising where underlying bedrock forces the subsurface flow of Copper Camp Creek to the surface. Under State Water Law this water qualifies as surface water. In as much as all the surface waters of the Verde River and all its tributaries have long been appropriated by downstream water users, including shareholders of the Salt River Valley Water Users' Association, the use of such water in either the exploratory drilling or any subsequent mining operations will be vigorously protested by the Association.

Should the proponents be able as an alternate to develop additional surface water, outside of the stream course, which is appropriable under State Law, they must perfect an Application to Appropriate Water with the Arizona State Land Department prior to its use. An Intent to Drill must likewise be filed with the Land Department before a well for water may be drilled.

Mr. Fred J. Wirth
November 1, 1972
Page two

The Association must also request that the exploratory drilling and any subsequent mineral development be conducted in a manner which protects the existing water quality in Copper Camp Creek. We will look to the Tonto National Forest's hydrologist to monitor the stream and keep the Association informed on the status of water quality below the proponents' operations.

One of the main (and growing) sources of sediment production on the Verde River watershed is road cuts. To protect remaining reservoir capacity, it is imperative that the specifications for the proposed access road be designed to keep sediment losses to a minimum. At the same time, adequate drainage must be provided to prevent ponding and loss of water to the downstream users. We have every confidence the Tonto's engineering staff will be able to design the road to meet those two criteria.

We hope you find our comments of value in preparing the final environmental impact statement and will be looking forward to learning the Tonto's final action in this matter.

Sincerely yours,

WATERSHED DIVISION

William L. Warskow

WILLIAM L. WARSKOW

Senior Watershed Specialist

cc: Ken McCollum
Al Colton
Joe Melling

Western Wood Products Association

1500 Yeon Building Portland, Oregon 97204 Area Code 503-224-3930 Cable Code WESTWOOD

October 30, 1972

Mr. Fred J. Wirth, Forest Supervisor
Tonto National Forest
230 North First Avenue, Room 6428
Phoenix, Arizona 85025

Dear Mr. Wirth;

We have a copy of "a DRAFT environmental statement CONCERNING a mineral exploration proposal in the MAZATZAL WILDERNESS" on the Tonto National Forest. First, a request: kindly forward a copy of the letter describing the proposed operation which was mailed to 20 parties.

On page 27, under VII: IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES; it appears that the case is well stated. Quoting; "if the proposed drilling reveals a mineral resource of great enough economic potential, it is conceivable that a full-scale mining operation would result. In that case, a portion of the Wilderness resource would be lost."

"On the other hand, if the proposed action showed evidence that the mineral resource was not of great enough economic potential, there would be sufficient evidence to prevent future exploratory work. That particular area of Wilderness would then be safeguarded for its long-term use."

Earlier in the draft, alternatives to accomodate exploration are examined in detail; almost exhaustive detail. These seem to be reasonable and objectively stated. There are values to be protected in case the mineral value is not there but yet, even that can't be determined without drilling.

We have not discussed the draft statement with Messrs. Rodney and Dibble but it seems to us that both parties have values, on the one hand to protect, and on the other to explore and possibly develop. It is indeed a viable and dynamic situation in which reasonable parties ought to be able to achieve an economic as well as an aesthetic solution.

We therefore urge that the Forest Service and Messrs. Rodney and Dibble meet requirements of related statutes in a manner which will satisfy both private and public rights and interests.

Very sincerely,



Ery Kulosa
Area Manager