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A general list of Issues related to the Kirkland Mine

Air Quality

1. Dust generation may impact community members in the immediate vicinity and downwind in several directions. Temporary dust abatement measures are included in the Mine plan of operations, specifically using water to keep areas of Mine operations moist. There are two problems with this approach— 1.) the use of groundwater to reduce dust and 2.) the long-term impacts of micro-particle generation. Groundwater in the upper alluvium is limited, even if deeper groundwater is excessive—see more under groundwater resources below. Micro-particles generated through the scraping and crushing processes may be temporarily abated by spraying water, but after they dry, the wind will cause these to be airborne as long as the Mine is in operation and for decades thereafter. These will affect people, wildlife, and livestock in the broader vicinity downwind of the project area as winds can be very strong and carry these particles long distances.
2. Pollution from heavy equipment and from trucks in this valley also increase air pollution. Wind patterns in the valley will carry this pollution along the valley; and thus impact the people, livestock and wildlife in the entire project vicinity.

Noise

1. Several sensitive noise receptors (residential areas, schools, churches) are located near the Mine property.
2. Heavy equipment used to extract and crush the material will generate substantial noise impacts for residents, livestock, and wildlife.
3. Increased truck traffic will impact residents along the transportation route from the Mine site to the destination towns.

Health and safety

1. Silica in the dust has known adverse health impacts.
2. Air contamination from heavy equipment and trucks will impact people along the valley and transportation route.
3. Increased traffic on Iron Springs Road will cause more accidents and is a danger for local people (especially children), livestock and wildlife.
4. Fire at the Mine site is a very real potential and danger.
5. Skull Valley has a volunteer fire department that respond to accidents in the Mine vicinity and on Iron Springs Rd. These local residents are already taxed with the amount of traffic incidences and local medical emergencies. They know

the rural area and are able to respond more quickly than emergency medical responders from Prescott.

Traffic

1. Increased traffic due to the Kirkland Mine on Iron Springs Road (estimated at 85 truck trips per day—but it is not clear if this is one way trips or round trips) will impact local residents and tourists with noise, dust, air pollution and traffic congestion.
2. The increased traffic will impact residents who live along Iron Springs Road, Copper Basin Road, Williamson Valley Road, and Highway 89 as well as communities who use these roads to access Prescott, not limited to Ruger Ranch, Rancho Diamante, Long Meadow Ranch, Las Vegas Ranch, as well as rural residents from Yarnell to Bagdad to Ash Fork who use these access roads to come into Prescott.
3. Loaded haul trucks, travelling slowly on the steep grade will slow traffic going uphill so that travel times to and from work, school, shopping, entertainment, and emergency facilities are longer and more dangerous.
4. Increased traffic and traffic congestion will damage roadways, generate more air pollution, and ultimately cost taxpayers money.
5. Traffic going into Prescott is already dangerous because of limited passing zones, steep grades, sharp curves, and high speed motorists.
6. The local volunteer fire department has responded to many accidents in this area, including several fatalities, and slow haul trucks will increase the amount of traffic incidences along the two-lane road for twenty+ miles in both directions.
7. This increased traffic will also impact the ability of emergency personnel to respond to local non-Mine related emergencies by slowing traffic conditions in general between Skull Valley and Prescott.
8. The danger and accidents will eventually force Yavapai County to widen Iron Springs Road on taxpayer funds.
9. The increased traffic will cost residents time and people's lives, and cause frustration and anger.

Socioeconomic Impacts

1. Valley residents are concerned that the benefits of the Mine will not be shared among community members—who are the ones to bear most of the costs. Many rural people are marginalized in that they have reduced access to health care, legal expertise, financial power to confront environmental justice issues, and may not be able to access or respond to public engagement efforts by the BLM and Mine during scoping and public response periods.
2. The Mine will generate few jobs in the community.
3. The Mine will decrease property values, not just in the immediate vicinity, but in areas along the transportation routes.
4. The Mine and BLM have not adequately involved the public in the surrounding area in the public process.

Surface Water

1. Creeks in the immediate project area vicinity have relatively permanent flow and may harbor unique species or provide valuable water resources to plants and animals. There are also springs, wetlands, and special aquatic sites in the project area vicinity that will be directly and indirectly affected by Mine operations, not limited to excavation and stockpiling, airborne particulate contamination, and a change in functions and services related to Mine operations, traffic, noise, increased personnel, ground disturbance, and alterations of wildlife corridors and other biological connectivity such as species genetics between upgradient perennial waters and downgradient perennial waters. Springs in the project vicinity may hold unique species and provide special functions and services to the surrounding environment; these springs may be affected by changes in groundwater quantity due to groundwater extraction by the Mine.
2. Drainage features on the project area are likely to be jurisdictional waters of the U.S. and have a significant nexus to downstream traditional navigable waters. Local wetland areas and special aquatic sites in Skull Valley trap pollutants, filter stormwater, provide habitat and support the ecological, biological, and chemical characteristics of downstream traditional navigable waters on the Colorado River. If the Corps determines that drainage features on the project area do not have a significant nexus with the downstream TNW, then as a community, we will appeal using the federal appeals process.
3. Micro-particles may contaminate surface water in the on-site and surrounding drainages, and affect water quality and local riparian species.
4. Mine operations may disrupt biological corridors that are dependent on surface water.
5. Project area waterways may be polluted by spilled fuels.

Groundwater

1. The current well on Mine property is drawing shallow groundwater from the local alluvium. This groundwater is limited, and a drawdown would affect the wells of local residents as well as springs in the area.

Biological Resources

1. Skull Valley has unique biological resources because of its natural, year-round wetlands and special aquatic sites, its riparian vegetation, and contiguous riparian habitat along Skull Valley wash and several of the associated tributaries. Washes on the Mine property have surface water and shallow pools most of the year and serve to host riparian obligate species. While these pools may seem small, riparian areas in Arizona are unique and provide valuable functions and services to species and ecosystems.
2. Yellow-billed cuckoos have been recorded by local bird biologists in this valley. While habitat on the project area does not provide the habitat primary constituent elements of riparian woodlands 200 or more acres in extent and dynamic riverine processes, the riparian habitat on the project area could provide valuable stopover habitat. Surveys have not been conducted in the valley to determine if the recorded yellow-billed cuckoos were migrant or

nesting individuals; if they do nest in Skull Valley, direct impacts of the Mine could include noise and dust generation.

3. Nesting birds utilize the riparian habitat along the drainage features of the project area. Noise and dust generation would deter these species from nesting or decrease the likelihood of successful reproduction.
4. Migratory birds may use the project area washes as stopover habitat, and these would be affected by the destruction of the drainage feature beneath the proposed Mine footprint and the noise and dust generation that may deter them from using washes proximate to the Mine footprint.
5. Bald and golden eagles have been seen in Skull Valley. Bald eagles are migratory, and golden eagles occasionally establish nests in the area. The cliffs may provide potential nesting habitat for golden eagles.