ARIZONA WILDLIFE FEDERATION
644 N. Country Club Drive, Suite E
Mesa, Arizona 85201

February 6, 1998

Dennis Wells, Commissioner
Arizona State Land Department
1616 W. Adams
Phoenix, AZ 85007

Re: Application No. 04-102858, Minerals Materials, Sections 22 and 26, R1E, T15N, G&SRB&M

Dear Mr. Wells:

On February 1, 1998, Ace Peterson, Region 3 Director of the Arizona Wildlife Federation (AWF), represented the AWF at a meeting of the Citizens Against Trust Lands Exploitation (CASTLE). At this meeting, we received copies of the application along with written statements from the town of Prescott Valley and the Arizona Game and Fish Department. These documents have been reviewed, along with the application documents submitted by Guzman Construction Company.

We understand that Guzman Construction requests a mineral materials extraction permit and permission to construct a concrete and asphalt plant on this land. Approximately 100 acres of the state lands requested are near the junction of State Highway 89A and Fain Road. We also understand that Mr. Guzman intends to locate similar operations on private parcels adjacent to the state trust land parcels.

The Arizona Wildlife Federation opposes this application by the Guzman Construction Company. Two resoluted positions of the Federation specifically address such activities and are the basis for our concerns and opposition. AWF omnibus resolution #31 states, in part: "The Arizona Wildlife Federation requests the federal and state land management agencies to consider all mineral applications on a site specific basis; that an environmental assessment, minimum prerequisite, be prepared for each individual mining site, and that maximum resource protection be required during each stage of development, exploration to final reclamation activities…" AWF omnibus resolution #91 states, in part: "The Arizona Wildlife Federation supports the setting aside of a significant percentage of presently held state trust lands to protect beauty, natural and heritage values, open spaces and wildlife habitat; and using natural resources in a way that conserves their long-term value…"

We feel these resolutions aptly express our concerns regarding the use of our public lands and are pertinent to the concerns raised by CASTLE, the town of Prescott Valley and the Arizona Game and Fish Department regarding this application. Our specific concerns include, but may not be limited to those listed on the attachemnt.

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Established 1923 as The Arizona Game Protective Association • State Affiliate of the National Wildlife Federation, Washington, D C

We feel that the existing mineral and gravel operation within the town limits of Prescott Valley adequately serves the needs of the area. Creating another large mineral/gravel operation would only serve to degrade environmental conditions in Prescott Valley.

We appreciate your consideration of our comments regarding this matter. We would be interested in working with your department, Mr. Guzman and Mr. Fain, of Fain Land and Cattle Company, to pursue other viable alternatives such as conservation easements, conservation trusts or other similar measures which would allow the state and private lands now considered for mineral development to remain in a natural state.

Sincerely,

Don Farmer,
President Arizona Wildlife Federation

Guzman Construction Mineral Extraction Permit Concerns

1. Loss of open space for human and wildlife interest.

2. Potential loss of antelope herds in the immediate vicinity, or negative impacts on antelope habitat. The area applied for is a critical fawning and breeding area for antelope.

3. Impacts on a sensitive species such as the Northern Goshawk and on associated other raptors.

4. Loss of valuable ground water. The application discusses the need for 3.6 million gallons of water during the life of the permit. We are currently in danger of having a "groundwater" mining declaration assigned to the Prescott Valley area. Such use of valuable water in this area could result in an over drawdown of wells serving livestock, wildlife and nearby private developments.

5. The General Plan of Prescott Valley includes outlined standards and goals to protect clean air, retain natural vistas and protect the appearance of natural gateways to the town. All of these would be impacted by this operation. We have additional concerns about the increased dust and other particulate matter that would be caused by heavy equipment along newly created haul roads and existing dirt roads. Other clean air concerns center on the discharges that would result from the asphalt operation.

6. The open pit condition would reduce the values of existing nearby residential areas and of another large development currently under proposal in the immediate area. This condition would be long term.

7. Wildlife migration patterns for Mule deer and antelope in the vicinity would be disrupted through the loss of travel corridors within the four sections of state and private lands proposed for this operation.

8. The proposed site is located over a major drainage which feeds into the Agua Fria River. Silt, debris and discharged effluents would contaminate both waterways.

9. The application fails to address mitigation for damages to, or loss of, wildlife habitat. In the information provided at the meeting on February 1, there is no description of catch basins, erosion protection dikes or air quality protection measures.

10. It has been our observation, with similar operations in northern Arizona, that the restoration of disturbed lands has had limited success. There is not enough topsoil in the area of operation, even when stockpiled, to provide a sound nutrient base for disturbed or transplanted vegetation. Water needed for efforts to restore vegetation will be an additional drain on pumped ground water.

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