

# **Pinto Valley Mine**

## **Environmental Impact Statement**

### **Supplemental Information Report**



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## Acronyms and Abbreviations

BAER	Burned Area Emergency Response
CFR	Code of Federal Regulations
EIS	environmental impact statement
Forest Service	U.S. Department of Agriculture, Forest Service

# 1.0 Introduction

## 1.1 Background

On April 9, 2021, the Tonto National Forest published the final environmental impact statement (EIS) and draft record of decision (ROD) for the Pinto Valley Mine project. Publication of the final EIS and draft ROD initiated the Administrative Review Objection Period under 36 Code of Federal Regulations (CFR) 218, which concluded on May 24, 2021. On August 9, 2021 the Regional Forester issued an objection response letter that included instruction for the Tonto National Forest to make a few clarifications in the final ROD and/or in an Errata to the final EIS.

Prior to release of the final ROD, the Forest Service assessed the availability of new information and changed conditions since the final EIS and draft ROD were released on April 9, 2021. The Forest Service determined that new information and changed conditions since the final EIS warranted the preparation of a Supplemental Information Report to disclose the changed conditions and determine if they result in significant new circumstances, impacts, or information relevant to the description of the affected environment, the environmental consequences, or the proposed action and its impacts described in the final EIS.

## 1.2 Purpose

The objective of this Supplemental Information Report is to determine whether new information or changed circumstances are within the scope and range of effects considered in the original analysis (40 Code of Federal Regulations (CFR) 1502.9(d); and FSH 1909.15, section 18). If the new information or changed conditions are beyond the scope and range of effects considered in the original analysis, the responsible official will determine whether the original analysis should be corrected, supplemented, or revised. If new information or changed conditions are within the scope and range of effects considered in the original analysis, the responsible official will determine whether a correction of the final EIS is needed. This report documents the ID team's review of new information and comparison of impacts with the original analysis presented in the Pinto Valley Mine Project final EIS.

The Forest Service identified the following new information or changed conditions since release of the Pinto Valley Mine final EIS. Refer to Section 2.0 for a description of the new information and changed conditions.

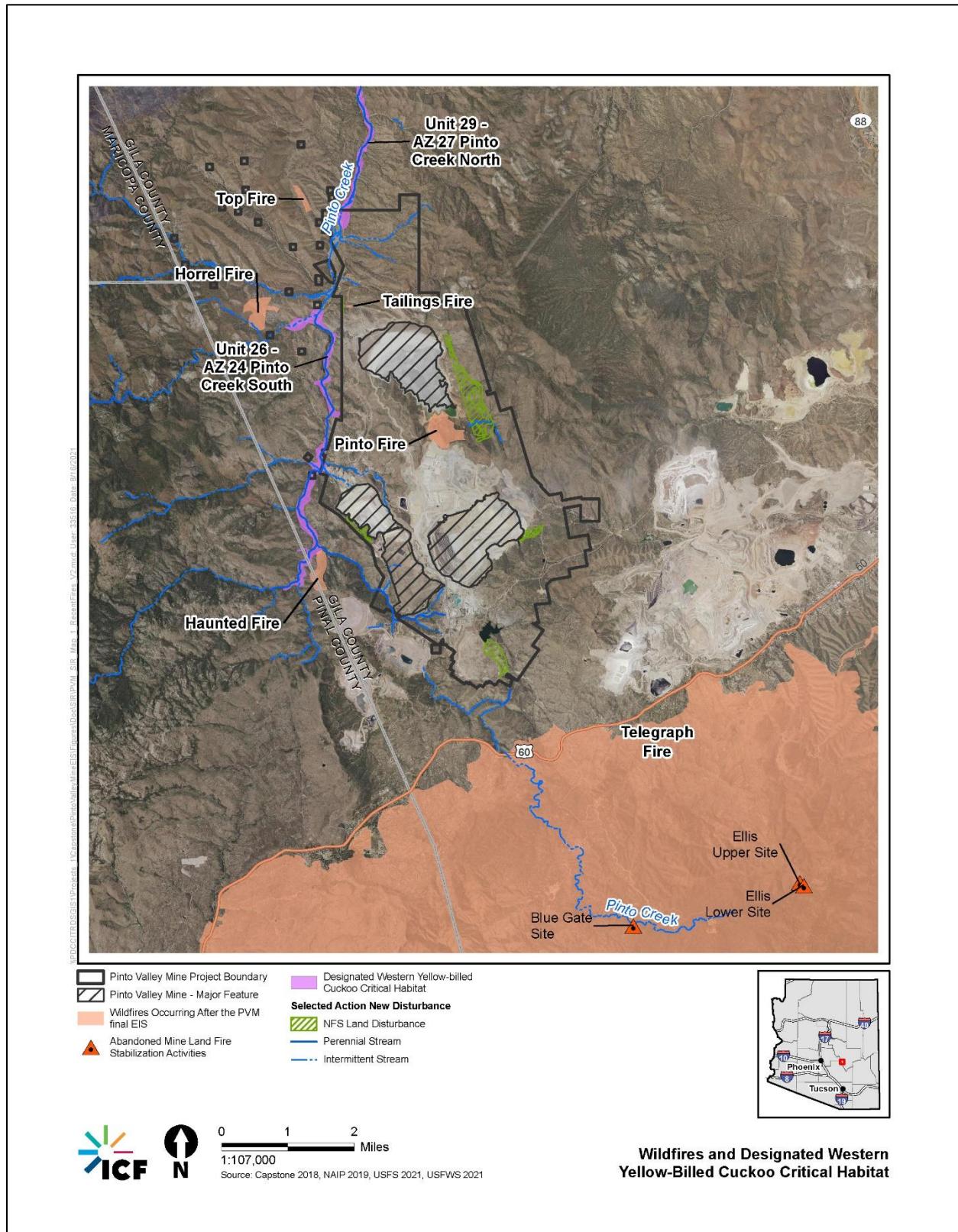
- Several wildfires occurred in and around the Pinto Valley Mine including five relatively small fires and one large fire, the Telegraph Fire.
- In April 2021 the U.S. Fish and Wildlife Service formally designated the two units of proposed critical habitat for western yellow-billed cuckoo that were described and analyzed in the final EIS (USFWS 2021).
- Identification of additional reasonably foreseeable actions that could contribute to cumulative impacts.

## 2.0 Description of New Information or Changed Conditions

### 2.1 Wildfires

Following release of the Pinto Valley Mine final EIS, six wildfires occurred in and around the Pinto Valley Mine. Section 3.8, “Fire and Fuels Management” of the final EIS describes wildfire occurrence trends in the Tonto National Forest and accounts for the potential occurrence and severity of future wildfires as part of the reasonably foreseeable actions and cumulative impacts analysis presented in Chapter 3, “Affected Environment and Environmental Consequences”. The additional six wildfires are described below and are depicted on figure 1.

- The Telegraph Fire occurred on a mix of National Forest System lands, Bureau of Land Management land, and Arizona State Trust lands and burned an estimated 180,757 acres (Forest Service 2021). The Telegraph Fire burned from June 4 to approximately July 3, 2021 and was potentially human caused but the cause is still under investigation. The fire burned through mixed conifer forest, ponderosa pine forest, madrean encinal woodland, interior chaparral, and Sonoran desert vegetation types. The burned area lies within portions of sixteen 12-digit Hydrologic Unit Code (HUC) watersheds that drain to four 8-digit HUC watersheds. Three watersheds drain to Queen Creek, three to Pinal Creek and ultimately the Salt River, three to the San Carlos River, five to the Gila River, and one to Roosevelt Lake. The Telegraph Fire burned approximately 5,800 acres in the Upper Pinto Creek watershed including 921 acres of low burn severity, 3,855 acres of moderate burn severity and 190 acres of high burn severity. Refer to the Telegraph Fire Burned Area Emergency Responses (BAER) Assessment for additional information on the fire (Forest Service 2021). Soil burn severity indicates the effect of the fire on soil productivity and health and is generally based on the temperature and duration of a wildfire. High and moderate severity burns to the soil can result in hydrophobic (water repellent) conditions that surface water flows, erosion, and sedimentation.
- The Pinto Fire occurred entirely on private land and burned an estimated 119 acres. The Pinto Fire burned from May 12 to May 14, 2021 and human caused. There were no BAER assessments conducted for this fire.
- The Tailings Fire occurred entirely on private land and burned an estimated 1.4 acres. The Tailings Fire burned over the course of one day on May 25, 2021 and was likely caused by a lightning strike. There were no BAER assessments conducted for this small fire.
- The Haunted Fire occurred on National Forest System land in the Tonto National Forest and burned an estimated 64 acres. The Haunted Fire burned from June 28 to June 30, 2021 and was likely caused by a lightning strike. There were no BAER assessments conducted for this fire.
- The Horrel Fire occurred on National Forest System land in the Tonto National Forest and burned an estimated 90.5 acres. The Horrel fire burned from June 30 to July 1, 2021 and was likely caused by a lightning strike. There were no BAER assessments conducted for this fire.
- The Top Fire occurred on National Forest System land in the Tonto National Forest and burned an estimated 23 acres. The Top Fire burned from July 9 to July 11, 2021 and was likely caused by a lightning strike. There were no BAER assessments conducted for this fire.



**Figure 1. Wildfires and Yellow-Billed Cuckoo Designated Critical Habitat that Occurred Following Release of the Pinto Valley Mine Final EIS**

## 2.2 Designation of Critical Habitat for the Western Distinct Population Segment of the Yellow-Billed Cuckoo

The Pinto Valley Mine final EIS and the Biological Assessment (Forest Service 2020a) referenced and analyzed impacts to the critical habitat for western yellow-billed cuckoo in the analysis area that was proposed in August 2014 and revised in February 2020, but had not been designated at the time of publication of the final EIS (see final EIS section 3.3.3, “Special Status Species” and final EIS Appendix A, map 3-5). In April 2021, following publication of the final EIS, the U.S. Fish and Wildlife Service formally designated the two units of proposed critical habitat for western yellow-billed cuckoo that were described and analyzed in the final EIS (USFWS 2021). The critical habitat designated in April 2021 encompasses the exact same boundaries and area that was described and analyzed in the final EIS and Biological Assessment including Unit 26: AZ 24, Pinto Creek South with 254 acres occurring in the analysis area and Unit 29: AZ 27, Pinto Creek North with 54 acres occurring in the analysis area (see map 2 below). In addition, there were no changes to the critical habitat components of these units between the proposed critical habitat area described and analyzed in the final EIS and the formal designation of these units as critical habitat following the final EIS.

## 2.3 Reasonably Foreseeable Actions

Following release of the Pinto Valley Mine final EIS a variety of additional projects were added to the Tonto National Forest Schedule of Proposed Actions that warrant consideration in the cumulative impacts analysis for the the Pinto Valley Mine EIS. The Schedule of Proposed Actions can be found online at: <https://www.fs.fed.us/sopa/components/reports/sopa-110312-2021-07.pdf>

Table 1 summarizes the additional reasonably foreseeable actions and indicates if the project would overlap the temporal and spatial extent of impacts from the alternatives analyzed in the Pinto Valley Mine final EIS. Projects that are outside the spatial and temporal scope of impacts from the alternative analyzed in detail in the Pinto Valley Mine final EIS would not contribute to cumulative impacts. Those projects that are reasonably foreseeable and within the spatial and temporal scope of impacts could contribute to cumulative impacts and are further discussed in section 3.0 of this Supplemental Information Report. The reasonably foreseeable actions that are within the spatial and temporal scope of impacts of the Pinto Valley Mine proposed action and alternatives include the Telegraph Fire scar stabilization activities for abandoned mine lands, the Phoenix Silver Exploration Project, and the utility right-of-way herbicide treatment project.



**Table 1. Additional Reasonably Foreseeable Future Actions Identified Following Release of the Pinto Valley Mine Final EIS**

Reasonably Foreseeable Future Action	Primary Regulatory Agency	Schedule	Approximate Project Area Size (acres) or Length (miles)	Approximate Distance from Pinto Valley Mine Project (at closest points)	Description	Reasonably Foreseeable?	Temporal Overlap?	Spatial Overlap and Resource?
Telegraph Fire Scar Stabilization Activities for Abandoned Mine Lands	Forest Service	Expected start in 8/2021	Varies	5-7 miles	Pinto Valley Mining Corp, and other mining companies, are working with the Tonto National Forest to stabilize soils on two recently reclaimed abandoned mines within the Pinto Creek watershed that were burned in the Telegraph Fire. Activities are proposed at the Ellis Vein Mine and the Blue Gate Mine (see figure 1). Stabilization activities include installation of straw wattles with wooden stakes and installation of erosion control fabric with landscape staples.	Yes	Yes	Yes -Water Resources -Visual Resources
Phoenix Silver Exploration Project	Forest Service	Expected start in 12/2021	1.75 acres	7 miles	A proposed exploration drilling project consisting of up to 40 exploration drill holes from 13 sites located on National Forest System land. The total estimated surface disturbance on National Forest System lands is estimated at 1.75 acres. Water would be required for drilling operations and would be brought in via a water truck from an offsite source.	Yes	Yes	Yes -Air Quality -Climate Change -Visual Resources

**Table 1. Additional Reasonably Foreseeable Future Actions Identified Following Release of the Pinto Valley Mine Final EIS**

Reasonably Foreseeable Future Action	Primary Regulatory Agency	Schedule	Approximate Project Area Size (acres) or Length (miles)	Approximate Distance from Pinto Valley Mine Project (at closest points)	Description	Reasonably Foreseeable?	Temporal Overlap?	Spatial Overlap and Resource?
Utility Right-of-Way Herbicide Treatment Project	Forest Service, Arizona Public Service Company, Salt River Project	Expected start in 10/2021	Varies, approximately 777 miles of transmission lines in the Tonto National Forest	Varies	A proposal to use herbicides to manage vegetation as part of utility vegetation management activities within established rights-of-way on National Forest System land in the Tonto National Forest, Apache-Sitgreaves Forest, Coconino Forest, Kaibab Forest, and Prescott Forest in Arizona. If authorized, USFA and EPA approved herbicides would be used in combination with existing vegetation management methods (manual and mechanical).	Yes	Yes	Yes -Biological Resources -Livestock Grazing -Visual Resources -Water Resources
Glen Canyon Rogers 230/345 kV Integrated Vegetation Management Program	Forest Service, Western Area Power Administration	Expected start in winter 2022.	Varies	50+ miles	Western is proposing to implement a operation and maintenance (O&M) and Integrated Vegetation Management program on the Rogers-Glen Canyon section of the Colorado River Storage Project. Transmission System. Includes use of herbicides.	Yes	Yes	No
Various Range Improvement Projects	Forest Service	2021-2022	Varies	10+ Miles	A variety of new range improvement projects have been proposed within the Tonto Basin Ranger District. The projects include water sources, pastures, water tanks, troughs, and other minor improvements.	Yes	Yes	No

### **3.0 Analysis of New Information or Changed Conditions**

This section describes how the new information or changed conditions described above in Section 2.0 would affect the baseline affected environment descriptions and if the new information or changed conditions significantly modify the disclosure the direct, indirect, and cumulative impacts of the proposed action and alternatives presented in the final EIS.

In this Supplemental Information Report, only those resources that are affected by the new information or changed conditions described above in Section 2.0 are carried forward for analysis. The Forest Service determined that the following resource conditions and analysis in the final EIS would not be affected by the new information or changed conditions because the changed conditions occurred outside the analysis area for the resource or did not have any effects on that particular resource.

- Cultural Resources
- Resources of Tribal Interest
- Environmental Justice
- Geology, Minerals, and Geotechnical Stability
- Paleontology
- Hazardous and Nonhazardous Materials
- Land Ownership
- Noise
- Public Health and Safety
- Recreation and Wilderness
- Socioeconomic Conditions
- Traffic and Transportation

## 3.1 Air Quality

### ***Changes to the Affected Environment from New Information or Changed Conditions***

The six wildfires that occurred following release of the final EIS resulted in total burn area of 263,916 acres in the analysis area resulting in short-term increases in regional emissions and associated effects on the air quality affected environment.

### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The six wildfires that occurred following release of the Pinto Valley Mine final EIS do not change the direct and indirect impacts associated with the proposed action and alternatives analyzed in the final EIS.

### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The six wildfires that occurred following release of the Pinto Valley Mine final EIS resulted in increased emissions of particulate matter of 10 microns in diameter and smaller (PM<sub>10</sub>), particulate matter of 2.5 microns in diameter and smaller (PM<sub>2.5</sub>), carbon dioxide, ozone precursors, and other pollutants that contribute to the short-term cumulative emissions in the air quality analysis area. The pollutant emissions associated with these fires may have also resulted in changes in air quality related values such as visibility and acidic deposition. However, increased emissions and changes in air quality related values associated with these fires were short-term in nature occurring during and directly after the fires and do not significantly change the overall regional emissions, ambient concentrations of pollutants, and cumulative effects presented in the final EIS.

The Phoenix Silver Exploration Project could contribute to minor emissions of PM<sub>10</sub>, PM<sub>2.5</sub>, nitrogen oxide, and other pollutants due to drilling activity, vehicle trips, and other activities. However, due to the short duration of the project (approximately 6 months) and the relatively limited extent of development and surface disturbance (~1.75 acres of disturbance) the project would not significantly affect the overall results of the cumulative impact modeling scenario presented in the final EIS, effects would be less than significant, and there would still be no anticipated exceedances of National Ambient Air Quality Standards. In addition, the operator would apply water provided by the drilling company via a water truck during road construction and other clearing activities to minimize the amount emissions generated from construction activities.

## 3.2 Biological Resources (Vegetation, Fish and Wildlife, and Special Status Species)

### ***Changes to the Affected Environment from New Information or Changed Conditions***

The yellow-billed cuckoo critical habitat designated in April 2021 encompasses the exact same boundaries and area that was described and analyzed as the proposed critical habitat in the final EIS and Biological Assessment including Unit 26: AZ 24, Pinto Creek South with 254 acres occurring in the biological resources analysis area and Unit 29: AZ 27, Pinto Creek North with 54 acres occurring in the analysis area. As such, the only change to the affected environment is the formal designation of these critical habitat units.

Following the final EIS, there were five wildfires that occurred within the biological resources analysis area. The five fires included the Haunted Fire, Horrel Fire, Pinto Fire, Tailings Fire, and Top Fire (figure 1) and they burned an estimated total of 298 acres within the biological resources analysis area,

which accounts for approximately 1 percent of the total acreage in the biological resources analysis area.

### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

There were no changes to the boundaries or critical habitat components of the yellow-billed cuckoo critical habitat units between the proposed critical habitat area described and analyzed in the final EIS and the formal designation of these units as critical habitat following the final EIS. As a result, the formal designation of the yellow-billed cuckoo critical habitat does not result in any changes to the direct or indirect effects analyzed in the final EIS.

The five wildfires that occurred in the analysis area following release of the Pinto Valley Mine final EIS do not change the disclosure of the project's direct and indirect impacts on biological resources associated with the proposed action and alternatives analyzed in the final EIS.

### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

There were no changes to the boundaries or critical habitat components of the yellow-billed cuckoo critical habitat units between the proposed critical habitat area described and analyzed in the final EIS and the formal designation of these units as critical habitat following the final EIS. As a result, the formal designation of the yellow-billed cuckoo critical habitat does not result in any changes to the cumulative effects analyzed in the final EIS.

The five wildfires that occurred within the biological resources cumulative analysis contribute to cumulative effects through the burning and removal of vegetation and wildlife habitat, temporary avoidance of these areas by wildlife, and potential changes in the vegetative composition following the wildfires. One of the wildfires, the Haunted Fire, had a burn area that overlapped approximately 2 acres of the yellow-billed cuckoo designated critical habitat unit 26-AZ 24 (figure 1), or 0.5 percent of the total 372 acres in the unit. Given that the burn area accounts for only 1 percent of the biological resource analysis and 0.5 percent of designated yellow-billed cuckoo habitat, and that the burn severity was likely low due to the relatively small extent and duration of the fires, these additional fires do not significantly contribute to or change the cumulative effects on biological resources from those presented in the final EIS.

The only additional reasonably foreseeable action identified in Table 1 that would overlap the spatial extent of the biological resource analysis area is the utility right-of-way herbicide treatment project. Application of herbicides to rights-of-way could pose potential risks to vegetative health and wildlife in the analysis area. For the pesticides commonly used by the Forest Service in its management activities, Human Health and Ecological Risk Assessments are prepared. In these documents, the process of risk assessment is used to quantitatively evaluate the probability and risk that a pesticide use might pose harm to humans or other species in the environment. The Utilities are proposing to only use herbicides that are approved for use in Arizona and for which a risk assessment for the chemical in question has been prepared and approved. As a result, potential impacts to biological resources resulting from application of herbicides would not significantly contribute to or change cumulative impacts on biological resources from those presented in the final EIS.

### 3.3 Greenhouse Gas and Climate Change Impacts

#### ***Changes to the Affected Environment from New Information or Changed Conditions***

The six wildfires that occurred following release of the final EIS resulted in total burn area of 263,916 acres in the analysis area resulting in short-term increases in regional emissions of greenhouse gases and reduction in vegetation cover that provides carbon sequestration.

#### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The six wildfires that occurred in the analysis area following release of the Pinto Valley Mine final EIS do not change the disclosure of the project's direct and indirect impacts on greenhouse gases and climate change associated with the proposed action and alternatives analyzed in the final EIS.

#### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The six wildfires that occurred following release of the Pinto Valley Mine final EIS resulted in increased emissions of carbon dioxide and other greenhouse gas emissions that contribute to the short-term cumulative emissions of these pollutants in the analysis area. However, increased emissions associated with these fires were short-term and would not significantly change the regional greenhouse gas cumulative emissions and trends in the analysis area from those presented in the final EIS. The six fires also burned through mixed conifer forest, ponderosa pine forest, madrean encinal woodland, interior chaparral, and Sonoran desert vegetation types. Conversion of these vegetation types to a fire burned landscape contributes to cumulative effects by reducing the carbon sequestration and storage capacity of these areas. However, this land use change is not expected to contribute to long-term cumulative effects on the total carbon sequestration capacity in the region and would not significantly change or contribute to climate change effects.

The Phoenix Silver Exploration Project could contribute to minor emissions of carbon dioxide and other greenhouse gases due to drilling activity, vehicle trips, and other activities. However, due to the short duration of the project (approximately 6 months) and the relatively limited extent of development and surface disturbance of 1.75 acres, the project would not significantly contribute to or change the cumulative impacts on climate change from those presented in the final EIS.

### 3.4 Fire and Fuels Management

#### ***Changes to the Affected Environment from New Information or Changed Conditions***

Following the final EIS, there were five wildfires that occurred within the fire and fuels management analysis area. The five fires included the Haunted Fire, Horrel Fire, Pinto Fire, Tailings Fire, and Top Fire (figure 1) and they burned an estimated total of 298 acres within the analysis area.

#### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The five wildfires that occurred in the direct and indirect impact analysis area following release of the Pinto Valley Mine final EIS do not change the direct and indirect impacts on fire and fuels management associated with the proposed action and alternatives analyzed in the final EIS.

#### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The five fires that occurred in the fire and fuels management area modified the affected environment for fire and fuels by changing the presence, density, type, and age of vegetative fuel within the areas; reducing the potential for future wildfires in these burn areas in the short-term; and providing for fuel

breaks that could reduce the spread of potential future wildfires in these areas. However, given the relatively small extent of these fires they did not significantly change the cumulative impacts on unplanned ignitions and fuel loading from the impacts presented in the final EIS.

These wildfires provided an opportunity to apply wildfire response strategies and tactics among Pinto Valley Mining Corp., the Forest Service, and other entities, which could lead to improved wildfire response in the future. These fires also provided lessons learned that were used to refine the Pinto Valley Mine Fire Prevention and Response Plan that will be submitted along with the final Plan of Operations for the project. As a result, the fires likely contributed to beneficial cumulative effects on fire and fuels management by potentially improving fire management and response in the future.

There were no reasonably foreseeable actions identified in Table 1 that overlap the fire and fuels management cumulative effects analysis area. As a result, there are no changes to the cumulative impacts on fire and fuels management from those presented in the final EIS.

### **3.5 Livestock Grazing**

#### ***Changes to the Affected Environment from New Information or Changed Conditions***

Following the final EIS, there were three wildfires that occurred on National Forest System lands within the livestock grazing analysis area. The three fires included the Top Fire, Horrel Fire, and Haunted Fire with a total burn area of approximately 177 acres.

#### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The three wildfires that occurred in the direct and indirect impact analysis area following release of the Pinto Valley Mine final EIS do not change the direct and indirect impacts on livestock grazing associated with the proposed action and alternatives analyzed in the final EIS.

#### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The two fires that occurred on National Forest System lands within the livestock grazing cumulative effects analysis area could contribute to cumulative effects. The Top Fire and Horrel fire occurred in the Pinto Creek allotment and burned approximately 114 acres. The Haunted Fire occurred in the Sleeping Beauty allotment and burned approximately 64 acres. These fires contribute to cumulative impacts on livestock grazing through loss of forage in the burn areas and temporary displacement of grazing activities in the areas. Given the relatively small burn areas of these fires in relation to the overall acreage of these allotments, the fires do not significantly change the cumulative effects on livestock grazing from those presented in the final EIS.

The only additional reasonably foreseeable action identified in Table 1 that would overlap the spatial extent of the livestock grazing analysis area is the utility right-of-way herbicide treatment project. Application of herbicides to rights-of-way could pose potential risks to forage and livestock in the analysis area. For the pesticides commonly used by the Forest Service in its management activities, Human Health and Ecological Risk Assessments are prepared. In these documents, the process of risk assessment is used to quantitatively evaluate the probability and risk that a pesticide use might pose harm to humans or other species in the environment. The Utilities are proposing to only use herbicides that are approved for use in Arizona and for which a risk assessment for the chemical in question has been prepared and approved. As a result, potential impacts to biological resources resulting from application of herbicides would not significantly change the cumulative impacts on livestock grazing from those presented in the final EIS.

## 3.6 Soils

### ***Changes to the Affected Environment from New Information or Changed Conditions***

Following the final EIS, there were two wildfires that occurred within the analysis area for soils. The two fires included the Tailings Fire and the Pinto Fire (figure 1) that burned approximately 120 acres, all on private land.

### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The two wildfires that occurred in the direct and indirect impact analysis area following release of the Pinto Valley Mine final EIS do not change the direct and indirect impacts on soils associated with the proposed action and alternatives analyzed in the final EIS.

### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The two wildfires that occurred in the cumulative effects analysis for soils could contribute to cumulative effects by affecting vegetative cover, modifying the physical characteristics of soils (e.g., drainage, texture) and increasing short-term soil erosion and sedimentation during rainfall events. However, given the relatively small burn area of the Tailings Fire and Pinto Fire, and that they were relatively short duration, potential contributions to cumulative effects on soils would not significantly change the cumulative impacts on soils from those presented in the final EIS.

There were no reasonably foreseeable actions identified in Table 1 that overlap the soil resources cumulative effects analysis area. As a result, there are no changes to the cumulative impacts on soil resources from those presented in the final EIS.

## 3.7 Visual Resources

### ***Changes to the Affected Environment from New Information or Changed Conditions***

Following the final EIS, there were six wildfires that occurred within the analysis area for visual resources. The six fires burned an estimated 135,387 acres with the majority of the burn area associated with the Telegraph Fire (figure 1).

### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The wildfires that occurred in the direct and indirect impact analysis area following release of the Pinto Valley Mine final EIS do not change the direct and indirect impacts on visual resources associated with the proposed action and alternatives analyzed in the final EIS.

### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The six wildfires that occurred in the visual resources cumulative effects analysis area contribute to cumulative effects by altering the visual setting from mixed conifer forest, ponderosa pine forest, madrean encinal woodland, interior chaparral, and Sonoran desert vegetation types to a fire burned visual setting. As described in section 3.8, "Fire and Fuels Management" in the final EIS from 200 to 2019 there were approximately 3,900 wildfires recorded in the Tonto National Forest that burned an estimated 909,069 acres and wildfires are a frequent occurrence in the area. As such, wildfires in the visual resource analysis area are typical in the region and do not significantly change the cumulative effects on visual resources from those presented in the final EIS.

The Phoenix Silver Exploration Project could contribute to short-term impacts on the visual setting in the analysis area due to drilling activity, vehicle trips, and other activities. However, due to the short



duration of the project (approximately 6 months) and the relatively limited extent of development and surface disturbance (~1.75 acres of disturbance) the project would not significantly alter the cumulative effects presented in the final EIS.

The Telegraph Fire Scar Stabilization Activities for Abandoned Mine Lands would occur within the visual resource cumulative effects analysis area approximately 5-7 miles from the Pinto Valley Mine project boundary. However, the minor activities associated with this project, such as installation of erosion control fabric and straw wattles, would not significantly contribute to cumulative effects and would not significantly alter the cumulative effects presented in the final EIS.

The Utility Right-of-Way Herbicide Treatment Project would occur in various locations in the visual resource cumulative effects analysis area. Application of herbicides to manage vegetation along rights-of-way would not significantly contribute to cumulative effects and would not significantly alter the cumulative effects presented in the final EIS because the activities and treated areas would be localized to areas just along rights-of-way where the transmission lines and associated rights-of-way are already the prominent feature affecting the visual setting.

### **3.8 Water Resources and Hydrogeochemistry**

#### ***Changes to the Affected Environment from New Information or Changed Conditions***

Following the final EIS, there were six wildfires that occurred within the analysis area for water resources and hydrogeochemistry. The six fires burned an estimated 4,966 acres in the Upper Pinto Creek watershed. The burn area included approximately 921 acres of low burn severity, 3,855 acres of moderate burn severity, and 190 acres of high burn severity. These fires modified the affected environment for water resources and hydrogeochemistry by altering soil hydrologic function and porosity and vegetative cover that affect runoff and erosion potential, especially during storm events. High and moderate burn severity areas can often result in hydrophobic (water repellent) conditions that increase erosion, runoff, and sedimentation that can migrate to surface water resources (Forest Service 2021).

#### ***Changes to Direct and Indirect Impacts from New Information or Changed Conditions***

The wildfires that occurred in the direct and indirect impact analysis area following release of the Pinto Valley Mine final EIS do not change the direct and indirect impacts on water resources associated with the proposed action and alternatives analyzed in the final EIS.

#### ***Changes to Cumulative Impacts from New Information or Changed Conditions***

The six wildfires that burned within the water resource cumulative effects analysis area could contribute to cumulative impacts by decreasing water infiltration during storm events and increasing surface water flows, erosion, sedimentation, and ash that can migrate to surface water features, including to Pinto Creek. The increased peak flows and the sediment and ash that these flows can transport can cause aggradation, down cutting, and/or widening of stream channels that can reduce the functioning condition of these stream channels within and below burned areas (Forest Service 2021). Post fire flows have greater potential to scour channels and transport material than do regular rainfall runoff events that occur over unburned landscapes. The magnitude of these flows should decline as ash and debris are transported from the watershed. Increased surface flows during rainfall events could increase flooding risk to abandoned mine land areas that could result in contamination of flows that migrate into surface water features, such as Pinto Creek. According to the BAER report for the Telegraph Fire there are two mines within the burn area that could experience moderate to

The first few high intensity storms following the wildfires would pose the greatest potential for increased flows downstream of the burned areas. Once the initial flush of burned material has been washed from the watershed, peak flows are governed more by watershed condition than by post fire ash, sediment, and post burn debris. As a result, potential contributions to surface water cumulative effects would be increased in the short-term due to these fires, but over the long-term surface water quality would continue to be influenced primarily by overall watershed conditions. As a result, while the wildfires would increase short-term effects on flows and water quality in Pinto Creek and the Upper Pinto Creek Watershed the fires would not significantly change the cumulative impacts to water resources over the longer-term duration of temporal effects from those presented in the final EIS.

As indicated in Table 1, Pinto Valley Mining Corp, and other mining companies, are working with the Tonto National Forest to stabilize soils on two recently reclaimed abandoned mines within the Pinto Creek watershed that were identified as areas of concern in the 2021 Telegraph Fire BAER report (figure 1). Activities are proposed at the Ellis Vein Mine and the Henderson Blue Gate Mine (see figure 1). These activities would help to stabilize soils and vegetation and reduce surface water flows, sedimentation, and erosion in the burned areas resulting in beneficial contributions to cumulative effects.

The utility right-of-way herbicide treatment project would result in the application of herbicides in various locations throughout the water resource cumulative effects analysis area. Application of herbicides to rights-of-way could pose potential risks to water quality depending on the types of herbicides used and the ecological effect. For the herbicides commonly used by the Forest Service in its management activities, Human Health and Ecological Risk Assessments are prepared. In these documents, the process of risk assessment is used to quantitatively evaluate the probability and risk that a pesticide use might pose harm to humans or other species in the environment. The Utilities are proposing to only use herbicides that are approved for use in Arizona and for which a risk assessment for the chemical in question has been prepared and approved. As a result, potential contributions to cumulative effects resulting from application of herbicides would not significantly contribute to cumulative impacts on water resources.

## 4.0 Conclusions and Determination

This Supplemental Information Report documents the interdisciplinary review and consideration of changed circumstances and additional information following publication of the Pinto Valley Mine final EIS. This Supplemental Information Report also documents my determination that a correction, supplement, or revision to the final EIS is not necessary because a review of new information and changed conditions indicates that there are no new significant effects that were not previously considered in the final EIS and the new information and changed circumstances do not require changes to proposed action and other alternatives analyzed in the final EIS. This report will be added to the project file.



Neil Bosworth  
Tonto National Forest Supervisor

8/19/2021

Date

## 5.0 References

U.S. Department of Agriculture, Forest Service (Forest Service). 2020a. Final Biological Assessment for the Pinto Valley Mine. July 20, 2020.

U.S. Department of Agriculture, Forest Service (Forest Service). 2021. Telegraph Fire Burned Area Emergency Response Assessment. Globe Ranger District, Tonto National Forest. July 9, 2021. Available online at: [https://inciweb.nwcg.gov/photos/AZTNF/2021-06-20-1602-Telegraph-PostFire-BAER/related\\_files/pict20210609-144047-0.pdf](https://inciweb.nwcg.gov/photos/AZTNF/2021-06-20-1602-Telegraph-PostFire-BAER/related_files/pict20210609-144047-0.pdf).

U.S. Fish and Wildlife Service (USFWS). 2021. Federal Register Notice Regarding Designation of Critical Habitat for the Western Distinct Population Segment of the Yellow-Billed Cuckoo. Federal