



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**



Chiricahua National Monument  
Fort Bowie National Historic Site  
12856 E. Rhyolite Creek Road  
Willcox, AZ 85643

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December 1, 2010

Dear Concerned Party:

This letter is an update on the Environmental Assessment (EA) for Road Access Across Fort Bowie National Historic Site (FBNHS). In June we sent a letter to you asking for your comments on the proposed action. Since then we have conducted an Engineering Study of the road and been evaluating the potential impacts on a variety of topics. We are still discussing the issues internally and plan to have a draft EA for your review early next year. The following is an outline of the analysis being performed.

**Background:**

The purpose of the EA is to examine the environmental impacts associated with a proposal from Midwest Mining to allow them access across Fort Bowie to a mining claim on lands administered by the Bureau of Land Management (BLM). There is an existing, primitive road and the mining claimant has proposed that the road be improved to allow two-wheel drive access. This environmental assessment will address the impacts of road access across FBNHS and indirect effects to the historic site as a result of the mining operation. It does not assess the impacts of mining on BLM lands.

On April 2, 2010 the Bureau of Land Management signed a Finding of no Significant Impacts (FONSI) approving Midwest Mining's Plan of Operation to mine placer gold on an area adjacent to FBNHS in the Apache Pass Mining District (EA Number: DOI-BLM-AZ-G010-2010-0013-EA, Safford Field Office). The plan of operations is to mine placer or surface gold, using standard gold concentrators such as: gold pans, dry washers, and trommels on an historic mine site. The plan calls for reprocessing some of the soils mined in past operations, probably around 1900. The area of disturbance is estimated to be approximately 5 acres. There have been mining claims staked on this area for decades along with minor "casual use" pick-and-shovel activities resulting in negligible surface disturbances. Mining company personnel are proposing to live on the mining claim.

According to BLM documents, the trommels have 2-3 horsepower motors, similar to a lawnmower. They can process up to 70 cubic yards of material per day, and mining personnel estimate there are 25,000 cubic yards of material available for processing over the next two years. The trommels will be used in conjunction with gold pans and dry washers. Other equipment would include a TD6 front end loader for moving the ore for processing, and a small TD-14 bulldozer for maintaining the road. BLM has authorized Midwest Mining to conduct road maintenance activities in order to allow access to the mining claim, however, the current character of the road is to be maintained. This means that the road may be water barred or mining spoils may be used for fill, however, they are not allowing road widening or changes to the character of the road. The BLM FONSI also allows for occupancy of the site by personnel of the mining company.



**Alternatives:**

The following are the alternatives that are under consideration:

**Alternative A – No-Action**

Under this alternative, the road would be left as-is with no improvements. The road would be considered 'unimproved', and under the FHWA Road Inventory Program the road would not be assigned a route number and would meet Functional Class IV, meaning it is a primitive park road providing access to an undeveloped area. These roads have no minimum design standards and use is generally limited to specially equipped vehicles. There are no construction or maintenance costs associated with this alternative.

**Alternative B – Four-wheel Drive Access**

This alternative would implement minor improvements in order to better accommodate 4wd vehicles. Improvements would consist of filling in major ruts and fine grading portions of the road. This alternative would maintain the primitive character of the road. No grading would occur on the historic Butterfield Stage Route section of the road. The minor improvements to the road under this alternative would be implemented by NPS staff or a contractor working under their direction.

This alternative would cost \$5000 for the initial filling and grading. Annual maintenance costs would be approximately \$1800 per year to re-grade the road twice a year and replacing gravel following concentrated rainfall events.

**Alternative C – Recreational Vehicle Access (Proponent's Alternative)**

Midwest Mining has proposed that the road be improved to allow for 2wd motor home access. Improvements would include adjustments to the vertical profile to prevent the motor home(s) from scraping bottom on the road surface, curve widening to accommodate the larger turning radius of a motor home, leveling the road surface, and improving the drainage by installing larger drainage structures and raising the road profile/cross section to eliminate the depressed center of the road in order to shed runoff away from the road prism. This alternative would also involve the removal of some vegetation along the road. This alternative would alter the primitive character of the road due to the extent of re-engineering of the road, and the installation of culverts and rip rap. If this alternative is selected, NPS staff or contractors working under NPS direction would implement all improvements.

The cost of these road improvements is estimated to be approximately \$50,000. Annual maintenance would be about \$2000.

**Impact Topics for Evaluation:**

Alternatives are being evaluated against the following impact topics:

**Park Operations**

Allowing greater access to an area of the historic site that receives little visitation and making any road improvements would result in impacts to the park operations. Because there may be impacts to park operations from some of the action alternatives, this topic is analyzed in detail.

**Visitor Use and Experience**

The National Park Service is committed to providing appropriate, high quality opportunities for visitors to enjoy the parks, and will maintain within the parks an atmosphere that is open, inviting, and accessible to every segment of society.

Improved road conditions could allow more visitors access to this area and result in a more enjoyable experience for some visitors. There also may be impacts to the overall visitor experience from impacts to the viewshed from the mining operations. Although no mining is proposed in FBNHS, the mining activities adjacent to the site may also impact the soundscape, scenic views and visual resources adjacent to the site. Since there would be indirect impacts to visitor use and experience at Fort Bowie, this topic is analyzed in detail.

### Cultural Landscapes

According to the National Park Service's Director's Order-28 *Cultural Resource Management Guideline*, a cultural landscape is a reflection of human adaptation and use of natural resources, and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. A cultural landscape inventory has been conducted for the historic site and it determined that the unaltered Fort Bowie landscape retains integrity. Since road access and mining activities have the potential to impact the cultural landscape, this impact topic is carried forward.

### Historic Structures and Archeological Resources

Cultural resources are those properties that are listed on or eligible for listing on the National Register of Historic Places, or are otherwise managed as a cultural resource through the public planning process and in which the NPS has or plans to acquire a legal interest. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation an opportunity to comment in the consultation process.

The Butterfield Stage Route and the mine road are historic structures and/or archeological sites. The mining road crosses the stage route on a ridge top. Part of the historic Quillin Mine Complex is in the vicinity of the road. There are existing remnants of mining activities. The age of the access road is unknown. However, documentation shows that the Quillin Mine was in operation in 1905 and it is assumed the road is at least this old. There was a spring in the mining area in the past and it is assumed the road may date back to the time of the Fort. This road could be eligible as an historic structure and/or archeological site. Alternative C would alter the character of the road and could have impacts on historic structures and/or archeological sites. For these reasons this impact topic has been carried forward for further analysis.

### Special Status Species

The Endangered Species Act of 1973 requires examination of impacts on all federally-listed threatened, endangered, and candidate species. The lesser long-nosed bat is known to be present in the vicinity of the mine and road. Occupation of the mine site by mine personnel at night could impact this bat species as they are active at night and sensitive to light. Therefore, this topic may be analyzed in detail.

### Soundscape Management

The natural ambient soundscape is the aggregate of all the natural sounds that occur in park units, together with the physical capacity for transmitting natural sounds. The soundscape for visitors in the vicinity of the mining operation and on the Butterfield trail could be impacted; on some days the noise may be audible at the visitor center and to visitors on the main entrance trail. Because there is the potential to have an impact on the soundscape of the Fort, this impact topic may be analyzed in detail.

By receipt of this letter, you are on our mailing list and will receive the EA when it is released. If you do not want to receive the EA, please give us a call or drop a note to:

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Thank you for your interest in this issue.