

ATTACHMENT # 8

**PAGES FROM ADMINISTRATIVE RECORD BEFORE
THE COURT
(Pertinent pages RE: mining)**

APR 23 1991

Memorandum

To: Chief, Planning & Environmental Coordination Staff
From: Deputy State Director, Mineral Resources
Subject: Comments to Third Preliminary Draft EIS/EIR for the Eagle Mountain Landfill Project

We have reviewed the subject document and offer the following comments:

(1) We reference our review comment #5 to the second preliminary draft (copy attached) of the subject document. The geologic map, as well as others, should be prepared with a more legible base and more geological and engineering data. The geologic map that is included with this EIS/EIR is not adequate. We believe that a geologic map should include the geologic detail to support the geologic discussion contained in the subject document. Figure 63 is not a geologic map. There is more to the geology of the project area than pre-alluvium basement. We expect, at least, the detail that is available from public information sources. As a second example, Figure 65 is not legible.

(2) We reference our review comment #6 to the second preliminary draft of the subject document. The known economically recoverable mineral reserves and sub-economically recoverable mineral resources of the Eagle Mountain Mine area are substantial and this proposed action will have a significant adverse impact upon their potential extraction. The sections that were incorporated into the subject document do not address the impacts to the mineral resources adequately. Consider the following points:

(a) Although a portion of the known reserves will not be covered with landfill material for a number of years, it seems unlikely that the landfill operations and additional mining operations could easily co-exist within the same area of surface facilities.

(b) What impact will the landfill have on the ability of any mining operation to move the necessary overburden to reach and mine in-place reserves? For instance, placing landfill material on even a small portion of an upper pit bench could effectively stop enlargement of the pit necessary to allow for extraction of in-place reserves.

(c) Although the known economically recoverable reserves of the Eagle Mountain Mine may seem inconsequential in comparison to the total reserves of the United States or the world, they exist in a unique circumstance. They are in the vicinity of an "inactive" mine. To many individuals within the minerals industry and government this can be considered an asset because: 1) a considerable amount of overburden has already been removed to expose the

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