

## Modena Canyon Mining – Destruction of Nelson Canyon

### Stormwater Flow From Nelson Canyon

As last communicated to the public, Progressive Contracting Inc plans to commence mining operations at the mouth of Nelson Canyon, with a 200 foot setback from Modena Canyon Road. Operations would proceed north, stripping Nelson Canyon of its natural topography. The applicant would also redirect the natural flow of water from Nelson Canyon into Modena Canyon in such a way as to avoid polluting stormwater and runoff from the mining operation.

Nelson Canyon is already narrow, and shows evidence of significant volume of seasonal water and debris flow. There is no reason to believe this can be contained or redirected in such a way that it will not bring silicates and other pollutants downstream, where they will again become airborne, endangering both grazing livestock, wildlife and human populations.



As noted elsewhere livestock typically graze on working ranches two miles and 3.7 miles below the mouth of Nelson Canyon. These areas WILL be reached by the natural flow of water in Modena Canyon. Iron County geologist Peter Drowley, who has mapped the entirety of Modena Canyon, commented on this plan, noting that:

Tuffs consists of shards of volcanic glass, formerly molten rock that erupts rapidly and the liquid magma changes instantly to solid glass, much like glass you are accustomed to. Like window glass, shards are mostly silica ( $\text{SiO}_2$ ), and they destroy jet engines, gills in fish, and lungs in animals when ingested from clouds. Shards have sharp points, for they are pieces of gas bubbles (water vapor) that drive the eruptions by expanding as they undergo less confining pressure when passing up the vent to the surface. In effect, people and animals die of silicosis by ingesting these sharp tiny pieces of glass.

## **Nelson Canyon is a Natural Wildlife Refuge**

The primary features of Nelson Canyon east of the Canyon Road are the natural course of water that seasonally flows through the canyon, and the wide wildlife trails that follow it. Immediately upon entering Nelson Canyon it is apparent that a significant number of the wild horses frequently seen in Modena Canyon shelter and travel through Nelson Canyon.





Given the established evidence of nesting raptors in the immediate area, it is clear that Nelson Canyon provides sensitive habitat to other protected species. Prior to allowing the obstruction of wildlife activity in the area a proper impact survey needs to be done for the entirety of Nelson Canyon that will be directly or indirectly affected.



All images above (except Modena Canyon horses) were taken in February 2025

## **Mitigation**

Absent an independent engineering study of strategies for management of stormwater and industrial runoff, the proposed plan is plainly devastating to downstream private property, livestock, and wildlife. The current plan for closing access to Nelson Canyon calls for the resident wildlife and human users to be excluded from (or trapped in) Nelson Canyon, obliterating valuable public resources and critical habitat. The proposal to conduct mining operation 100 feet from nesting raptors is clearly impermissible, and there is no credible evidence on the record that the proposed operations can be carried out without doing significant harm to protected species. Given these conditions, it must be recognized that the proposal fails to meet the standards for approval presented in the ordinance. There is no conceivable way to correct this deficiency.

[Save Modena Canyon](#)