



"Audrey Merriman"  
<audreymerriman@msn.com>

02/27/2008 03:19 PM

To <beverson@fs.fed.us>

cc

bcc

Subject Santa Rita Mountains

I am a longtime resident of Tucson and have great love for our beautiful lands. I have watched the news reports on the Rosemont Mine and have written letters to my Senators and Representatives in opposition to the mine.

If I can add my signiture to any petitions, or write letters of opposition, I would be happy to do so.

Unfortunately, I can not at this time, donate money.

I would appreciate any important information that you could send to me to keep me updated.

With great appreciation for all the people who are working so hard on Save The Scenic Santa Ritas,

Audrey Merriman  
11285 N. Placita Alameda Dorada  
Oro Valley, AZ 85737  
(520) 531-5314



"Annie McGreevy"  
<anniemcgreevy@gmail.com>

03/16/2008 09:40 AM

To "Beverley A Everson" <beverson@fs.fed.us>

cc

bcc

Subject Rosemont Scoping meetings

Beverley,

I think there should be more meetings in Tucson for the Rosemont scoping. Also they should be talks to all attending instead of one person at a time talking to each specialist.

Thank you for your help with this.

Annie McGreevy

**Mailroom R3 Coronado**  
Sent by: Karina Montez

03/17/2008 08:33 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES  
cc:  
bcc:  
Subject: Re: (no subject)

Perfectbil@cs.com



**Perfectbil@cs.com**  
03/15/2008 11:15 AM

To: mailroom\_r3\_coronado@fs.fed.us  
cc:  
Subject: (no subject)

Hello,

I wish to state my opposition to any approval of mining for the Rosemont Mine in the Santa Rita Mountains, whether now or at any other time. There may be some short term benefits economically, though even this is somewhat questionable given the eventual costs of reclamation and potential pollution. The loss of beauty in the short term, as well as use of the land for recreation, and the destruction of the land for an unforeseeable long-term are easily enough to outweigh any short-term gain.

Sincerely,

William Pritchard  
8912 n. Camino Coronado  
Tucson, Az. 85704

**Mailroom R3 Coronado**  
Sent by: Karina Montez

03/17/2008 08:33 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

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Sincerely,

William Pritchard  
8912 n. Camino Coronado  
Tucson, Az. 85704



Jeanine Derby/R3/USDAFS

03/17/2008 03:17 PM

To "Paul Green" <pgreen@tucsonaudubon.org>

cc Beverley A Everson/R3/USDAFS@FSNOTES, Andrea W Campbell/R3/USDAFS@FSNOTES

bcc

Subject Re: Rosemont Mine Scoping Process

Thank you for taking time to share Tucson Audubon's interests in this project. I will forward your letter to our team leader/geologist, Beverly Everson, to be placed in the official record.

It is unfortunate that the Federal Register announcement of the NOI came out a week later than we requested, thus the one week lead time for announcing the meetings instead of the two weeks planned. However, we have arranged for a 4th open house in Vail on April 5 and could consider another meeting, if needed.

The official scoping period is 30 days, but the Forest continues to accept public comment throughout the process. The purpose of scoping is to hear questions and concerns from the public early in the process so that the analysis can be designed to fully explore their issues. A draft EIS should be published in approximately one year with plenty of time for review by the public.

The scoping meetings will be held in an open house format where people can view maps and visuals of the proposed project, learn about the EIS process and talk with the analysis team. For those people who want detailed information about any aspect of the proposal, I understand that the proposed Mine Plan of Operations is available on the Company web site.

Jeanine Derby, Forest Supervisor  
Coronado National Forest  
phone: 520 388-8306  
FAX: 520 388-8305

"Paul Green" <pgreen@tucsonaudubon.org>



"Paul Green"  
<pgreen@tucsonaudubon.org>

03/17/2008 11:37 AM

To <jderby@fs.fed.us>

cc

Subject Rosemont Mine Scoping Process

Jeanine,  
Please find attached letter from Tucson Audubon Society to the Forest Service, text copied below.  
Thanks.

This letter is to inform you of the concern by Tucson Audubon regarding the scoping process for the Environmental Impact Statement (EIS) for the Rosemont mine, and the subsequent 30 day comment period deadline. Our concern focuses on the short notice period given for the initiation of this process.

To have less than seven days' notice of the start of the scoping meetings is both extremely short and rather unusual. To restrict the comment deadline to 30 days is also rather limiting. We all know that a thorough scoping process is in the best interests of us all, including the Applicant and the Service. Therefore we respectfully request that you extend the time period for comments by 120 additional days.

We also respectfully request that the Bureau of Land Management, Pima County, the Arizona Department

of Environmental Quality, the Arizona State Office of Historic Preservation and all communities who may be directly affected by the proposed mine (Sahuarita, Green Valley, Vail, Corona de Tucson, Sonoita, and Patagonia) are included as "cooperating agencies" in the EIS process.

We are interested to learn what format the meetings will take this week. We hope that the Forest Service meetings will be used to brief the public on the project and the process in a meaningful way that all can understand, and that you will allow some public comments and questions. We hope that you will take the opportunity of clearly explaining to the public the scope and the nature of the project and its potential impact on the landscape.

Speaking on behalf of our members in the region, we would hope that once we have been able to examine in detail the information that will be revealed this week, you will schedule follow-up meetings to receive input on the scope of the EIS. We also hope that you will arrange for follow-up meetings in Sonoita and Vail, since it is our understanding that each of these areas will be impacted by the proposed mining.

We thank you for your consideration of these matters.

Sincerely,,



---

Dr Paul Green  
Executive Director | Tucson Audubon Society

Skype |TAS-CEO| 520 777 9525 | Cell 520 235 1796  
300 E University Blvd, Ste 120, Tucson, AZ 85705

Conservation, Education, Recreation.  
Please support our work.



TAStoDerby.doc

# Tucson Audubon Society



**President**

Herb Trossman

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Craig Marken

Robert Merideth

Robert Mesta

Elizabeth Payne

Bill Roe

Robert Wenrick

**Executive Director**

Dr. Paul Green

Coronado National Forest, Supervisor's Office  
Jeanine Derby, Forest Supervisor  
300 W. Congress St.  
Tucson, AZ

Dear Jeanine,

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We thank you for your consideration of these matters.

Sincerely,,

A handwritten signature in black ink, appearing to read "Paul Green". The signature is stylized with a large, looping initial "P" and a smaller "L" and "G" following.

Dr Paul Green | Executive Director | Tucson Audubon

Thank you for helping us to save habitats for birds in southern Arizona

Conservation | Education | Recreation  
300 E University Blvd Ste 120, Tucson AZ 85705  
520 629 0510

Mailroom R3 Coronado  
Sent by: Karina Montez

03/17/2008 08:33 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

Subject: Re: (no subject)

Perfectbil@cs.com



Perfectbil@cs.com

03/15/2008 11:15 AM

To: mailroom\_r3\_coronado@fs.fed.us

cc:

Subject: (no subject)

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William Pritchard  
8912 n. Camino Coronado  
Tucson, Az. 85704

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Sincerely,

William Pritchard  
8912 n. Camino Coronado  
Tucson, Az. 85704

Jeanine Derby

*Bev  
for the record*

Mailroom R3 Coronado  
Sent by: Karina Montez

To: Jeanine Derby/R3/USDAFS@FSNOTES

cc

03/21/2008 08:48 AM

bcc

Subject: Re: Email for Jeanine Derby

"Alison Bunting" <abunting@sunnecast.net>



"Alison Bunting"  
<abunting@sunnecast.net>

To: <mailroom\_r3\_coronado@fs.fed.us>

cc:

Subject: Email for Jeanine Derby

03/20/2008 10:55 PM

I write to report my dismay at the actions taken by Coronado National Forest personnel at the "open house" to discuss the development of the environmental impact statement on the proposed Augusta Resource Rosemont Mine on Thursday, March 20, 2008 in Patagonia. When citizens in attendance expressed a concern about the format of the meeting and requested an opportunity to speak and be heard the Forest Service personnel left the meeting, 30 minutes after it started.

According your own press release the open house was "designed to allow attendees to view informational displays and ask specialists about the Rosemont Copper Project and the environmental impact statement (EIS) process, and 2) to submit written or oral comments onsite." With over 100 individuals in attendance, the small number of personnel present was not able to either answer questions or hear from even a fraction of those who wanted to receive or give information. When a change in format for the meeting was requested they did not even deign to discuss it; they just packed up and left.

Prior to the "open house" there was already strong concern that the Forest Service is just paying lip service to their responsibility to obtain public comment since the times and dates of the meeting were announced only a week in advance. I feel strongly that our rights as citizens to speak on this important issue have been seriously abridged and urge you to provide meaningful opportunities for citizen comments with a minimum of 30 days advance notice of any meetings.

**Alison Bunting**  
**P. O. Box 310**  
**Sonoita, AZ 85637**

~5259946.txt

From: JUDY BRYDON [montone.dreams@wildblue.net]

Sent: Friday, March 21, 2008 4:27 PM

To: akimbell@fs.fed.us

Subject: Rosemont Copper mine in Santa Rita Mountains, Arizona

Dear Ms. Kimbell:

I am writing to voice my complaint and the complaints of my neighbours, in the way the the local Forestry Service has handled the public input meetings for the Environmental Impact Studies Review concerning the Augusta Resource/Rosemont Copper mine. Three meetings have been held that had no speaker available from the Forestry, they were simply poster sessions with "comment" sheets. The third meeting held at Patagonia Union High School last night was a total disgrace; when the attendees voted on a meeting versus a poster session and laid out the chairs for the audience, the Forestry Service and the SWCA reps packed up and rushed out the side door, with no explanation. They then called in more police and border patrol reinforcements for a group of people sitting in chairs waiting to hear and be heard. These reinforcements did not even have to leave their cars.

This is a waste of time for the F.S. and the citizens of the local communities and today when we spoke to Forestry Service personnel, they are claiming that the meeting attendees became threatening to them which is is no way factual. People wanted to air their dissatisfaction about this open pit copper mine and find out just where the process was and what our options are.

Thank you for your time and I look forward to your response on this matter.

Judy Brydon  
HC 1 Box 1011, Sonoita, Az.  
85637

Mailroom R3 Coronado  
Sent by: Karina Montez

03/21/2008 08:28 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

Subject: Re: Fw: (OC): Rosemont Mine Santa Rita Mountains Tucson

Karen Terney



Karen Terney

03/19/2008 10:05 AM

To: mailroom\_r3\_coronado@fs.fed.us

cc:

Subject: Fw: (OC): Rosemont Mine Santa Rita Mountains Tucson

The comment below was sent to the Washington Office.

Karen Terney - Writer/Editor  
Ecosystem Management Coordination  
202-205-1732  
fax 202-205-1012

----- Forwarded by Karen Terney/WO/USDAFS on 03/19/2008 01:03 PM -----

Mailroom WO

Sent by: Vania Ochoa

03/19/2008 12:55 PM

To: Karen Terney/WO/USDAFS@FSNOTES

cc

Subject: Re: (OC): Rosemont Mine Santa Rita Mountains Tucson

<johnsconner@yahoo.com>



<johnsconner@yahoo.com>

03/18/2008 09:45 PM  
Please respond to  
johnsconner

To: mailroom\_wo@fs.fed.us

cc:

Subject: (OC): Rosemont Mine Santa Rita Mountains Tucson

Below is the result of your feedback form. It was submitted on:  
Tuesday, March 18th, 2008 at 9:45pm.

From: john conner <johnsconner@yahoo.com>  
subject: Rosemont Mine Santa Rita Mountains Tucson  
comment: I am a resident of Tucson Arizona. I am opposed to giving approval to mining in the Santa Rita mountains. I find it absurd that a beautiful part of Southern Arizona. I have hiked in this area and know it is a wonderful area and a reason why; people live and visit here. The National Forest Service should not approve mining here.

Thank you for your consideration.

----- Submission Details -----



"Annie McGreevy"  
<anniemcgreevy@gmail.com>

03/18/2008 12:17 PM

To "Beverley A Everson" <beverson@fs.fed.us>, "Jeanine  
Derby" <JDerby@fs.fed.us>, "Andrea W Campbell"  
<awcampbell@fs.fed.us>

cc

bcc

Subject More Scoping meetings in Tucson

Hello all,

Please hold MORE Scoping meetings in midtown Tucson, at least 2 more for those who can't attend tonight. Rosemont mine is a huge concern to Pima County residents. The format should be Forest Service speakers in front so that all can hear the all the questions and all the answers.

Annie McGreevy



"Peter Ott"  
<pott@shc.arizona.edu>  
03/19/2008 10:09 AM

To <beverson@fs.fed.us>  
cc  
bcc

Subject Rosemont paying people to support the mine

I attended last night's (3/18) US forest service meeting on the Rosemont mine project. I am against this mine and have stated so in several occasions.

It was appalling to see that Rosemont bussed people in, after having treated them to a dinner, made them sign petitions in support of the mine and make them wear Rosemont badges. I spoke to several of these individuals they clearly had no idea of the issues at hand and simply enjoyed an evening of "wining and dining".

I would expect a US government agency to disallow such obvious manipulation of the hearing process.

Peter Ott, M.D., FACC

Director of Electrophysiology Laboratory and Arrhythmia Services  
at University of Arizona Health Sciences Center, Sarver Heart Center

Phone: 520-626-6358

Fax: 520-626-4333

Physician line: 520-694-5868



"Mikey Block"  
<mikey@mikeyblock.com>  
03/19/2008 04:01 PM

To <beverson@fs.fed.us>  
cc  
bcc

Subject Augusta Resources "Rosemont Mine", Pima County, AZ

Dear Ms. Everson,

Please see my attached letter.

Thank you.

Sally Reichardt



E-mail: bsrsvn@azwildblue.com Rosemont Mine letter.doc

March 18, 2008

Coronado National Forest  
Beverly Everson  
300 West Congress Street  
Tucson, Arizona  
85701

Re: Augusta Resources proposed "Rosemont Mine"

Dear Ms. Everson,

I write to you, as a native Tucsonan, who is currently living in Sonoita and who is extremely concerned about the proposed Rosemont Mine. As a child, our family had very little money so we found camping on Mt. Lemmon to be a very inexpensive family vacation. I always thought that our National forests were for the enjoyment of the taxpayers. Apparently, I am wrong. The Coronado National Forest will become a dumping site of waste rock and tailings. Hundreds of acres paid for and enjoyed by American taxpayers will be destroyed by a foreign registered company scheduled to ship the majority of the mined copper outside of the United States.

I continue to hear, as I did throughout my entire childhood, how precious our water supply is; so precious that we had peak hours that we shouldn't water during. I now read, in Augusta's Rosemont Mine feasibility study that "Water quantities are limited and environmentally sensitive in the region of the Rosemont mine". Further, the study says: "fresh water makeup is 4.8 million gallons per day". Wow! It seems to me that the wells in the surrounding areas/towns will quickly run dry. Their study goes on to say "Property for other well locations are currently being acquired for the other 2,000 gpm requirement".

The study also states that "State Route 83 can be used to gain access to the plant road" and "This system of interstates and highway will allow for quick access to the site". I beg to differ. It will be far from "quick" access. Hwy. 83, as you know, is a two lane road with several windy areas. One such curve has one of the highest accident rates and, I believe, *the* highest rate in the State for motorcycles. We already have 18 wheelers using Hwy. 83 as a detour route because the bridge on I-10 to the East of Hwy. 83 is too short. We currently have many wide loads which require us to pull off to the side of the road and "wait". Last week, I had to pull over for four separate wide loads and that was just between Rosemont Junction & I-10. Several of our highway patrol cars are involved with these wide loads. Augusta said for the first two (or thereabouts) years, they will be running wide loads every 10 minutes. Nobody will be able to use this section of Hwy. 83. It will make travel impossible. The school busses will not be able to get the kids to school. The Patagonia-Sonoita Scenic (2<sup>nd</sup> oldest in Arizona) Hwy. sign will need to be taken down. Nobody, including bicyclists, motorcyclists and tourists will be able to travel from Tucson to the wineries, Tombstone, Parker Lake, Patagonia Lake or Patagonia, via Hwy. 83, thus, hurting tourism and the revenues of small businesses.

This mine, if built, will be seen from many miles away and their tailings will actually be located in the backyard of an existing neighborhood on Coronado National Forest property. Additionally, per their feasibility study, the mine will be "working two 12-hour shifts per day, seven days per week, 52 weeks per year". Property values in Sonoita, Patagonia and all of the surrounding areas, for hundreds of miles will plummet.

Add to the above, that this mine will only employ 327 people and a mine life of 18.2 years. It's no wonder that the Board of Supervisors voted to oppose this project. Not to mention that there's no guarantee, of course, that the mine won't go belly up in two years like some recent mines in the U.S. have. The proposed mine property contains many very, very old Oak trees and is one of the most pristine lands we have. If anyone believes that the mine can put this land back to anything close to what it is now, they are just dead wrong. It's impossible. The proposed mining site will destroy this area forever.

Contrary to what Augusta would have you believe, there is huge opposition to this mine. I urge you to consider the destruction of the Santa Ritas and Coronado National Forest by this open pit copper mine, as a travesty of the public trust and to reject the Rosemont Copper proposal.

Sincerely,

Sally Reichardt

E-mail: [bsrsvn@azwildblue.com](mailto:bsrsvn@azwildblue.com)



"Peter Ott"  
<pott@shc.arizona.edu>  
03/19/2008 10:09 AM

To <beverson@fs.fed.us>  
cc  
bcc

Subject Rosemont paying people to support the mine

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made them sign petitions in support of the mine and make them wear Rosemont badges I  
spoke to several of these individuals they clearly had no idea of the issues at hand and simply  
enjoyed an evening of "wining and dining".

I would expect a US government agency to disallow such obvious manipulation of the hearing  
process.

Peter Ott, M.D., FACC

Director of Electrophysiology Laboratory and Arrhythmia Services  
at University of Arizona Health Sciences Center, Sarver Heart Center

Phone: 520-626-6358

Fax: 520-626-4333

Physician line: 520-694-5868



Jeanine Derby/R3/USDAFS  
03/20/2008 10:35 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES  
cc  
bcc  
Subject: Fw: Rosemount Mine

Jeanine Derby, Forest Supervisor  
Coronado National Forest  
phone: 520 388-8306  
FAX: 520 388-8305

----- Forwarded by Jeanine Derby/R3/USDAFS on 03/20/2008 10:35 AM -----



"Richard Salzetti"  
<Rsalzetti@cox.net>  
03/20/2008 10:24 AM

To: <jderby@fs.fed.us>  
cc  
Subject: Rosemount Mine

As a resident of the area where the mine will be developed if approved I would like to go on record to highlight a few items that need to be considered. First, where is the water going to come from that will be used by the mine if approved. If it is from wells in the area surrounding the mine what impact will that have on the water residents in the draw from wells in the same general area. If a replacement source of water is not brought in by the mine for the duration of the mining operation the approval should not occur. Perhaps you are not aware but we do have a growing water shortage in the area and drawing out more water than what is replaced is not a good idea. Perhaps your home may suffer the consequences of either no water or a major reduction of water usage due to the mine using available water. Think about that possibility for perhaps yourself and other residents in that area. Second, ALL COMMUNITIES AND WATER COMPANIES AFFECTED BY THE DRAW DOWN OF WATER BY THE MINE SHOULD BE INVOLVED IN THE DECISION AS ALL WILL BE EFFECTED IN SOME WAY. Last item, The mine has developed local advertising on the merits of the mine and one is they will provide money to develop or create or help create areas to preserve the natural habitat of a area. It seems to me they could do that by not destroying land that is now in it's natural state and it would create more good will than developing a mine and then trying to pacify residents by giving a dollar or two to create a park or a few acres of natural growth land that is already in its natural state. Thank You Richard Salzetti

2665 East Genevieve Way  
Green Valley, AZ 85614  
April 11, 2008

Ms. Beverley Everson  
United States Forest Service  
Coronado National Forest  
300 West Congress Street  
Tucson, AZ 85701

Dear Ms. Everson:

Thank you for returning my phone call of April 10, 2008 and informing me of the status of the proposed reading for the Rosemont Copper Mine Project. This letter is a follow-up to the call.

I am a resident of the area, and I have determined that without mitigating measures built into this project which currently do not exist, I will be personally impacted and suffer personal as well economic damages, and so will all other residents of this area. The Rosemont Copper Mine project has the strong potential to turn the air quality of the region into CANCER ALLEY. The geochemistry of the mines in Pima County have documented trace amounts (that is, not economically desirable to extract but which will be environmentally released by mining processes and operations) at levels known to have adverse health effects of nickel, beryllium, cadmium, and arsenic, which are established airborne human carcinogens both under EPA rules, as well as analyses by the International Agency for Research on Cancer (IARC). Copper mines spew arsenic onto the landscape, and such evidence shows up in several areas of Pima County. I have not been able to determine from currently available public documents any indications or provisions that this problem has even been mentioned, no less discussed.

The letter is in two parts. The first part is to assure myself that I understand the things we discussed about the reading room, various documents related to the Rosemont Copper Mine Project, the nature of contract for the preparation of the Environmental Impact Statement for the project by SWCA and the role that the Forest Service plays in that contract through its Memorandum of Understanding with the Augusta Mine Corporation, and selected aspects of the public commentary period and upcoming "forums" and "public hearings."

The second part of this letter provides specific comments on some of the items we discussed on the phone, notably major deficiencies I see in the staffing of the team which will assemble the information and provide the analyses in the Environmental Impact Statement. I have tried to provide specific rationales for each of the comments. My motivation for this is that I am a resident of the area, and have determined based on my professional experience that I could be personally adversely impacted including injury, both economically as well as physically, by the proposed mine project unless certain mitigating measures are taken. In such cases, building into the activity the need for such measures, and providing information on those components that contribute to this effort, is a better plan than trying to correct mistakes after the fact.

In addition, I indicated that I would provide a CD-rom of power point presentation I made in Grand Forks, ND on the Red River of the North, to give a limited idea of my and interests. I have also included on that CD-rom a curriculum vita to give you an idea of my credentials.

#### Part I:

1. The Reading Room and Its Documents: You have indicated that delays in establishing the reading rooms at the Forest Service Tucson Office and the Ranger Office in Nogales stem mainly from having an inadequate number of copies available of all of the documents to be placed in the reading rooms. You have further indicated that it was your hope that the reading rooms would be operational by the week of April 14, 2008, and to contact you at that time for the latest status. I shall do that.

You have also indicated that the specific documents listed in my email to you, namely the consultant reports from Vector LLC, and Tetra Tech, etc. will be placed in the reading rooms, but if I wish specific copies, I will need to submit a FOIA application. I intend mainly to read the documents and take notes, but I need to know if copying of specific pages of these documents deposited in the room would also require a FOIA application. I do not need to build more bookcases for my technical library, nor increase the number of file cabinets in my office, at this stage of my life.

2. I was somewhat disappointed to learn from "blogger website" that the contract to SWCA was being funded by the proponents of the contract. My past experiences with the preparation of Environmental Impact Statements (EIS) for projects requiring a federal permit and on federal land were usually sponsored by written by the federal agency. You confirmed this arrangement, which basically places that contract out of the public purview, and raises in my mind serious questions about the transparency and openness of government processes. The Forest Service already has received considerable bad publicity about its handling of all public actions on the project, and that does not bode well for citizen oversight or for that matter for Congressional oversight of the Forest Service.

3. I have read the Memorandum of Understanding (hereafter referred to as MOU) between Forest Service and the Rosemont Copper Company. The MOU is a rather complex document. In this item of my letter, I specifically refer to item 15 of Section E, which details actions that the Rosemont Copper Company must accomplish, and states: "At No Time, direct the Prime Consultant in matters related to the NEPA review and or EIS/analyses and preparation." This is immediately followed by Item 1 in Section F, which indicates mutually agreed upon and understood accomplishments, and states: "The Prime Consultant will be under the supervision of the Forest Service, and the Forest Service will make the final determination concerning the scope and contents of the Consultant's work. The contract between the Proponent and the Prime Consultant will specify compliance with all legal requirements." I next refer to Attachment I, item III on "Consultation Staff Requirements." Together, these three items give the Forest Service the authority to require that those who work on EIS have met certain levels of credential and accomplishment.

4. With regard to public forums, public hearings, and public comments, you indicated that the formal commentary period prior to NEPA work has been extended to June 19, 2008. At the same time, the nature of the NEPA process will entail discussions back and forth among the Forest Service, SWCA and Rosemont Copper Company. As these discussions progress, there will be opportunities for public inputs on various issues. That needs a formal public announcement.

## Part II

This part of the letter includes comments on specific documents as well as aspects of the MOU with respect to staffing to produce an Environmental Impact Statement.

1. My first concerns are the appointments of the Consultant Team in the MOU. I have referenced the classical handbook, Federal Handbook X-118 which is used to evaluate positions in the federal service to see what some of the experience and educational requirements are for selected positions at selected levels. It is my understanding from our discussions that the Forest Service, in evaluating these credentials and experience, may undertake reference checks, background checks, and interview directly possible candidates.

**I want copies of the credentials of those persons who were appointed to produce the EIS, suitably redacted to avoid any compromising personal information (specially redacted for dates of birth, SSN, and contacts for personal and professional references to protect under privacy regulations), but assuring that the following information is present without redactions: names, educational background, experience, publications, memberships in professional learned societies, and licensures.** Once these people are appointed, their credentials become public information, and their curricula vitae are public documents. Consider this an FOIA request for that information.

2. The listing of consultant staff qualifications includes fourteen specific specialties. The first position listed is the Team Leader, who is to have ten years minimum experience in that capacity could be equivalent to anything from GS 13 to Senior Executive Service, depending on education and other factors associated with the experience. I think the level should be specified.

**The preparation of EIS materials is considered among many in environmental circles as the lowest level of consulting services, and the GS-13 is probably what you will get. However, to give greater assurance of a quality product, amaze me and appoint someone who could clearly be a GS-15, using as a guide line the credentials of senior research and supervisory people at USGS or NIH.**

I met the incumbent to this position at one of the public forums that the Forest Service held. I was not impressed with him or his associate. The Team Leader tended to pander to my comments, and his associate basically denigrated them. They played a bad act of "good cop/bad cop." The combination of false charm and controlled irritation in the two bodes poorly for my future examination of their efforts.

2. Of the thirteen other listed specialties, I find the following deficiencies:

(a) a GS-12 geologist with at least 10 years of experience emphasizing hard rock geology is not sufficient. You have also asked for a GS-12 equivalent hydrogeologist who specializes in remediation hydrogeology. If this specialist is to consider geological integrity of the groundwater source because of possible problems of subsidence, karst formation, and related factors, then that is fine and necessary. However, if the hydrogeologist is looking mainly at other concerns, you need to indicate these other concerns.

(b) a GS-12 geochemist with at least 10 years of experience emphasizing mining, mineral exploration and extraction, is not sufficient. A second geochemist is necessary at a comparable level who specializes in the geochemistry of groundwater. Outside of the USGS, such geochemists are rare. I worked many years in Canada, and the Canadians made dreadful mistakes when they decided that ground geochemists were an expendable specialty. The two greatest groundwater geochemists in North America, Alan Freeze and John Cherry had to relocate and begin again.

(c) A GS-12 biologist, either terrestrial or aquatic, with at least five years experience in wildlife biology. What kind of experience? Some wildlife biologists are basically game managers, others do research on migratory patterns and habitat issues, and some do other things. A person with wildlife experience who has both aquatic and terrestrial capabilities is hard to find. Biologists tend to be either terrestrial or aquatic, unless they are ornithologists, and most aquatic biologists seem to be fisheries types. I am not sure what aquatic wildlife of mammalian nature reside in the area, although the

Sonoran Desert Museum does have river otters from desert regions among its live animal specimens. You may need two such biologists, one for fishes and lower vertebrates, and one for birds and mammals. Given the low level of regard for many people who do EIS preparation in some circles, I would expect that all biologist appointments have thorough taxonomy training with their ecology training, even to the point of requiring museum experience. It is necessary to test this capability specifically and directly with prospective appointments.

(d) A GS-12 air quality specialist, with at least five years of NEPA experience in air quality. What exactly do you have in mind here? Some air quality specialists are strictly meteorology and “fate and transport types,” others deal monitoring systems. Industrial development in the vicinity of national forests calls for experience in both air pollution “fate and transport” and monitoring. The air quality legislation calls for two kinds of air pollution controls, primary controls based on human health, and second controls based on welfare and environmental considerations. The latter is the “visibility” and scenic vista concern, but nothing in any of this covers the former, public health. The copper mine is a potential emitter of “Priority Pollutants,” several of which are on the EPA list of 129 because of their adverse health effects. Air pollution specialists who can handle these materials are often much more experienced than the GS-12 level person you have called for.

**(e) Notably absent from the list are the following: human health specialists in epidemiology, cancer risk assessment, pulmonary physiology, occupational safety and health, exposure analysis, advanced statistics. Since the geochemistry of the region shows that airborne carcinogens will be emitted from the mining project, the absence of these specialties in the EIS committee is immediate grounds to reject any acceptance of the EIS and any decision approving the project.**

**(f) Notably absent is a chemical engineer, GS-13 or equivalent, to review the material and energy balance calculations for all the mining processes, and point out the points of emission and loss of materials, pollution discharge opportunities, process limitations for closed loop technologies, and evaluation of their effects.** Further such a specialist is probably better able to communicate with the other team members with respect to air quality issues. For reasons I have never understood, air quality is primarily in chemical engineering, and water quality is primarily in civil engineering. I make no comments about modern curricula in “environmental engineering.”

(g) The proposed post-project monitoring as given in a consultant report from Westland Resources (also briefly discussed in a later item) talks about a “flow and solute model.” Who produces this? What experience does that person have with large computer models of groundwater? Is a standard model to be adapted to the Rosemont Copper Mine situation? If so, it will depend on the comprehensiveness and appropriateness of the groundwater monitoring plan and the monitoring data, and who comments on the design of this plan in the EIS? And even, there are problems in adapting “off the shelf” computer models in hydrology.

3. Public Documents Available at the Green Valley Branch of the Pima County Library: On April 11, 2008, I reviewed the Plan of Operation document for the proposed Rosemont Mine prepared by the Westland Resources Company, dated July 31, 2006. This was the only document on the project deposited with the library. If there are others, they were missing.

My concerns with the document were the environmental issues, including various kinds of monitoring. The entire environmental section of interest was less than ten pages. The document lists a relatively complete listing of possible regulatory needs for this project, but it is short on specifics and full of platitudes about appropriate plans and considerations to occur down the road without any indication that anybody really knows anything about such considerations. The information provided on “sustainable principles” is laughable. I am not going to worry about the problems of paper clips when I need to examine closed-loop technologies.

The document did not address the needs listed below, and I hope the documents to be provided in the reading rooms do address these issues.

(a) Air pollution. The major discussion was control of fugitive emissions. There was no indication that air emissions related to the mining operations or processing of ores or other activities were considered.

(b) Human health aspects of air pollution. Many of the trace materials in the strata of mines in Pima County, when exposed through a mining operation and released airborne are established human and animal CARCINOGENS, notably nickel, cadmium, arsenic, beryllium, and under some special conditions iron oxides and cobalt oxides. Nickel, cadmium arsenic and beryllium are Priority Pollutants under the Toxic Substances Control Act. No consideration of the health impacts of other trace constituents present, notably lead and tungsten, were discussed either. Lead is a well known neurological and developmental toxicants.

(c) Risk assessment methodologies. When dealing with carcinogens and neurotoxins, the regulations use a risk assessment paradigm. The science of risk assessment for toxic chemicals has evolved considerably since first proposed in 1974 by then Administrator of EPA, Russell Train. No provision for a risk assessment of a single carcinogen is present in the planning document, and now one has to consider the risk assessment possibilities of multiple air pollutants because of the nature of the materials being processed. It is this situation which puts me in personal jeopardy with respect to health and welfare.

(d) Groundwater recharge waters. The plan contains a laudable idea of recharging some of the groundwater to mitigate the water losses of the aquifer. However, the quality of the recharge requires some very careful considerations with respect to the chemical and microbiological parameters. The origins of recharge water are not quite clear, but if they are from Colorado River as one apocryphal comment suggests, then there is a question of agricultural return flows causing this recharge water to be high in salinity, nitrates, and pesticides.

Nitrates can pass through the soil and sand strata untouched. Salinity will depend on the ability of the soil strata to act as a kind of ion-exchange resin to remove its excess levels, and pesticides are their special problems for groundwater.

(e) In the discussion of groundwater, there is a comment about a “flow and solute model” that will delineate DIA for the mine and demonstrate environmental compliance at selected POCs. How? Beyond the meaningless alphabet soup of acronyms, I never trust a computer model without a ground truth component. Computer models can generate artifacts and go unstable if the computer codes do not consider the effects of certain ranges and sensitivities of certain critical parameters in the model. There is no ground truth component, and by the time one realizes that non-compliance has occurred, it may be too late.

(f) Groundwater monitoring is very difficult. The Forest Service recognized that it when requested more detailed information on the groundwater monitoring proposals from the mining company. I have no idea what their response was, but it would be very appropriate to include that response in the public documents for the reading room.

In closing, I feel that the information that I have given you is so important, that I have sent it by certified mail with proof of receipt, snf made it an attachment to an email to you, and I have sent copies of it to numerous people on my mailing list, including town officials of Sahuarita, and Congresswoman Gabrielle Gifford’s office in Tucson..

Sincerely yours,

Joel L. Fisher (PhD)



Jeanine Derby/R3/USDAFS  
03/20/2008 10:35 AM

To Beverley A Everson/R3/USDAFS@FSNOTES  
cc  
bcc  
Subject Fw: Rosemount Mine

Jeanine Derby, Forest Supervisor  
Coronado National Forest  
phone: 520 388-8306  
FAX: 520 388-8305

----- Forwarded by Jeanine Derby/R3/USDAFS on 03/20/2008 10:35 AM -----



"Richard Salzetti"  
<Rsalzetti@cox.net>  
03/20/2008 10:24 AM

To <jderby@fs.fed.us>  
cc  
Subject Rosemount Mine

As a resident of the area where the mine will be developed if approved I would like to go on record to highlight a few items that need to be considered. First, where is the water going to come from that will be used by the mine if approved. If it is from wells in the area surrounding the mine what impact will that have on the water residents in the draw from wells in the same general area. If a replacement source of water is not brought in by the mine for the duration of the mining operation the approval should not occur. Perhaps you are not aware but we do have a growing water shortage in the area and drawing out more water than what is replaced is not a good idea. Perhaps your home may suffer the consequences of either no water or a major reduction of water usage due to the mine using available water. Think about that possibility for perhaps yourself and other residents in that area. Second, ALL COMMUNITIES AND WATER COMPANIES AFFECTED BY THE DRAW DOWN OF WATER BY THE MINE SHOULD BE INVOLVED IN THE DECISION AS ALL WILL BE EFFECTED IN SOME WAY. Last item, The mine has developed local advertising on the merits of the mine and one is they will provide money to develop or create or help create areas to preserve the natural habitat of a area. It seems to me they could do that by not destroying land that is now in it's natural state and it would create more good will than developing a mine and then trying to pacify residents by giving a dollar or two to create a park or a few acres of natural growth land that is already in its natural state. Thank You Richard Salzetti



Jeanine Derby/R3/USDAFS  
03/20/2008 11:27 AM

To "Dick Shuman" <shumans2@cox.net>  
cc Beverley A Everson/R3/USDAFS@FSNOTES  
bcc  
Subject Re: Rosemont EIS Open House March 18, 2007 in Green Valley 

Every comment that we receive on Rosemont becomes part of the record. Thank you for yours in the past. Because we were delayed in announcing meetings due to a delay in Federal Register announcing the Notice of Intent, I have agreed to extend the scoping period until May 19. We will check to assure that your mailing address is on the mailing list.

Jeanine Derby, Forest Supervisor  
Coronado National Forest  
phone: 520 388-8306  
FAX: 520 388-8305

"Dick Shuman" <shumans2@cox.net>



"Dick Shuman"  
<shumans2@cox.net>  
03/18/2008 04:30 PM

To "Derby, Jeanine" <jderby@fs.fed.us>, "Everson, Beverly" <beverson@fs.fed.us>, "Campbell, Andrea" <awcampbell@fs.fed.us>  
cc  
Subject Rosemont EIS Open House March 18, 2007 in Green Valley

Jeanine Derby, Forest Supervisor  
Coronado National Forest

I am upset about two aspects of subject open house in Green Valley

1. The short notice appearing in the Arizona Star (6 days).
2. I was not notified directly. I understood that I was on your notification list of any public notices or information.

I have the following question.

Will the two documents I submitted to you need to be resubmitted? Are they part of the comment record?

These are the letters I submitted on November 12 and December 30, 2007 under the subject of File Code 2810 Rosemont Plan of Operation.

In my letter of November 12, I requested that Rosemont be requested to make a comprehensive hydrological study of our aquifer to determine the exact impact that Rosemont pumping will have on our community. Has Rosemont been requested to do this?

Respectfully,  
Dick Shuman, PE  
Casa Paloma I Homeowners, Inc.  
Environmental Coordinator  
Ph: (520) 648-0445 Email [shumans2@cox.net](mailto:shumans2@cox.net)



Jeanine Derby/R3/USDAFS  
03/20/2008 10:35 AM

To Beverley A Everson/R3/USDAFS@FSNOTES  
cc  
bcc  
Subject Fw: Rosemount Mine

Jeanine Derby, Forest Supervisor  
Coronado National Forest  
phone: 520 388-8306  
FAX: 520 388-8305

----- Forwarded by Jeanine Derby/R3/USDAFS on 03/20/2008 10:35 AM -----



"Richard Salzetti"  
<Rsalzetti@cox.net>  
03/20/2008 10:24 AM

To <jderby@fs.fed.us>  
cc  
Subject Rosemount Mine

As a resident of the area where the mine will be developed if approved I would like to go on record to highlight a few items that need to be considered. First, where is the water going to come from that will be used by the mine if approved. If it is from wells in the area surrounding the mine what impact will that have on the water residents in the draw from wells in the same general area. If a replacement source of water is not brought in by the mine for the duration of the mining operation the approval should not occur. Perhaps you are not aware but we do have a growing water shortage in the area and drawing out more water than what is replaced is not a good idea. Perhaps your home may suffer the consequences of either no water or a major reduction of water usage due to the mine using available water. Think about that possibility for perhaps yourself and other residents in that area. Second, ALL COMMUNITIES AND WATER COMPANIES AFFECTED BY THE DRAW DOWN OF WATER BY THE MINE SHOULD BE INVOLVED IN THE DECISION AS ALL WILL BE EFFECTED IN SOME WAY. Last item, The mine has developed local advertising on the merits of the mine and one is they will provide money to develop or create or help create areas to preserve the natural habitat of a area. It seems to me they could do that by not destroying land that is now in it's natural state and it would create more good will than developing a mine and then trying to pacify residents by giving a dollar or two to create a park or a few acres of natural growth land that is already in its natural state. Thank You Richard Salzetti

**Mailroom R3 Coronado**  
Sent by: Karina Montez

03/21/2008 08:28 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

Subject: Re: Fw: (OC): Rosemont Mine Santa Rita Mountains Tucson

Karen Terney



**Karen Terney**

03/19/2008 10:05 AM

To: mailroom\_r3\_coronado@fs.fed.us

cc:

Subject: Fw: (OC): Rosemont Mine Santa Rita Mountains Tucson

The comment below was sent to the Washington Office.

Karen Terney - Writer/Editor  
Ecosystem Management Coordination  
202-205-1732  
fax 202-205-1012

----- Forwarded by Karen Terney/WO/USDAFS on 03/19/2008 01:03 PM -----

**Mailroom WO**

Sent by: Vania Ochoa

03/19/2008 12:55 PM

To: Karen Terney/WO/USDAFS@FSNOTES

cc

Subject: Re: (OC): Rosemont Mine Santa Rita Mountains Tucson

<johnsconner@yahoo.com>



<johnsconner@yahoo.com>

03/18/2008 09:45 PM

Please respond to  
johnsconner

To: mailroom\_wo@fs.fed.us

cc:

Subject: (OC): Rosemont Mine Santa Rita Mountains Tucson

Below is the result of your feedback form. It was submitted on:  
Tuesday, March 18th, 2008 at 9:45pm.

From: john conner <johnsconner@yahoo.com>  
subject: Rosemont Mine Santa Rita Mountains Tucson  
comment: I am a resident of Tucson Arizona. I am opposed to giving approval to mining in the Santa Rita mountains. I find it absurd that a beautiful part of Southern Arizona. I have hiked in this area and know it is a wonderful area and a reason why; people live and visit here. The National Forest Service should not approve mining here.

Thank you for your consideration.

----- Submission Details -----

Remote Address: 63.210.142.18

HTTP User Agent: Mozilla/4.0 (compatible; MSIE 6.0; Windows NT 5.0; .NET CLR  
1.1.4322; .NET CLR 2.0.50727)

---

**Mailroom R3 Coronado**  
Sent by: Karina Montez

03/21/2008 08:27 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

Subject: Re: Fw: (OC): Rosemont Copper Project

Karen Terney



**Karen Terney**

03/19/2008 09:39 AM

To: mailroom\_r3\_coronado@fs.fed.us

cc:

Subject: Fw: (OC): Rosemont Copper Project

The trailing email was sent to the Washington Office.

Karen Terney - Writer/Editor  
Ecosystem Management Coordination  
202-205-1732  
fax 202-205-1012

<tucsonhere@msn.com>



<tucsonhere@msn.com

>

03/18/2008 10:10 PM

Please respond to  
tucsonhere

To: mailroom\_wo@fs.fed.us

cc:

Subject: (OC): Rosemont Copper Project

Below is the result of your feedback form. It was submitted on:  
Tuesday, March 18th, 2008 at 10:10pm.

From: Robert Miggins <tucsonhere@msn.com>  
subject: Rosemont Copper Project  
comment: I support and concur with those comments and concerns of  
Representative Gabrielle Giffords; Member of the U.S. Congress as written in  
her letter to Mr. Corbin Newman; Regional Forester U.S. Forest Service Region  
3. Please Re-consider the negative impact of the Rosemont Copper Project in  
the Santa Rita Mountains.

----- Submission Details -----  
Remote Address: 64.215.172.230  
HTTP User Agent: Mozilla/5.0 (Windows; U; Windows NT 5.1; en-US; rv:1.8.1.12)  
Gecko/20080201 Firefox/2.0.0.12  
-----

Mailroom R3 Coronado  
Sent by: Karina Montez

03/21/2008 08:27 AM

To: Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

Subject: Re: Fw: (OC): Rosemont Copper Project

Karen Terney

 Karen Terney

03/19/2008 09:39 AM

To: mailroom\_r3\_coronado@fs.fed.us

cc:

Subject: Fw: (OC): Rosemont Copper Project

The trailing email was sent to the Washington Office.

Karen Terney - Writer/Editor  
Ecosystem Management Coordination  
202-205-1732  
fax 202-205-1012

<tucsonhere@msn.com>



<tucsonhere@msn.com>

03/18/2008 10:10 PM

Please respond to  
tucsonhere

To: mailroom\_wo@fs.fed.us

cc:

Subject: (OC): Rosemont Copper Project

Below is the result of your feedback form. It was submitted on:  
Tuesday, March 18th, 2008 at 10:10pm.

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subject: Rosemont Copper Project  
comment: I support and concur with those comments and concerns of  
Representative Gabrielle Giffords; Member of the U.S. Congress as written in  
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3. Please Re-consider the negative impact of the Rosemont Copper Project in  
the Santa Rita Mountains.

----- Submission Details -----  
Remote Address: 64.215.172.230  
HTTP User Agent: Mozilla/5.0 (Windows; U; Windows NT 5.1; en-US; rv:1.8.1.12)  
Gecko/20080201 Firefox/2.0.0.12  
-----



Pjbonthron@aol.com  
03/26/2008 02:18 PM

To beverson@fs.fed.us  
cc  
bcc  
Subject Letter Re Rosemont mine

Attached is a letter regarding the Rosemont mine. We will also send you a hard copy in the mail tomorrow.

Gunnar and Peggy Bonthron



Create a Home Theater Like the Pros. [Watch the video on AOL Home.](#) Forest Service Letter.doc

**GUNNAR & PEGGY BONTHRON  
421 NORTH MOUNTAIN BROOK DRIVE  
GREEN VALLEY, ARIZONA 85614  
520-399-1886**

March 27, 2008

Beverly Everson  
USDA Forest Service  
Coronado National Forest  
300 West Congress Street  
Tucson, Arizona 85701

Subject: Proposed Rosemont Mine

Dear Ms. Everson:

We have been following the proposed Rosemont Mine efforts and attending your recent public meetings. We wanted to attend these meetings and move around the crowds so we could hear first-hand input from the various communities. I am sure you found out, as we did, that there is strong opposition for this large mine being allowed in this area. People here are so stressed that our government, and your government agency, would allow such a thing like this to happen based upon the looming water shortage we are facing here. Many people that we spoke with said, "The Forest Service has already made up their mind to allow this mine to operate, these meetings are only window-dressing." We truly hope that this is not the case.

We hope you will take the time to read this entire letter and have a better understanding of the facts and what Green Valley/Sahuarita may be facing in just a few years as it relates to our water shortage.

As you well know, we have been in a drought situation for the past 10 years in Arizona. In many areas, more groundwater is being pumped than being replaced. This holds especially true in the Green Valley area. We have been in an overdraft situation for many years. For FY 2006, we had an overdraft of 40,000 AF. We have not received the figures for 2007, but it will be more than that because of the massive groundwater pumping by the copper mine, the pecan grove and golf courses. All are demanding more water due to higher temperatures in the summer and less rainfall. This is not a fantasy, but real facts. Note: When Sierra Vista had an annual overdraft of just over 4,000 AF, everyone got into a panic and wanted to address the issue, and did. Green Valley area has

an overdraft of over 40,000 AF annually, and no one seems to really care. There has been a lot of talk, but no sound action. Every day/month/year that goes by, only compounds the severity of the groundwater crisis. Government agencies and politicians perceive that we are all over 65 and maybe have less than 10-12 years, so why bother. Then a new group of retirees will move to town and we can continue to fool them for a while longer.

In 1998 when the Malcolm Pirnie Report was published, everyone knew (DWR, Pima County, copper mine, pecan grove) if we did not begin some type of groundwater recharge, the area was going to be in trouble. The proposed CAP pipeline was presented that would extend from Pima Mine Road to the Canoa Ranch area. Phelps Dodge and FICO (pecan grove) decided it was cheaper to pump groundwater, rather than do the right thing and they forfeited the offer of 23,000 AF of CAP water annually. Also, they did not want to assist financially with the extension of the pipeline. It is not up to the taxpayers to pay this bill, as the copper mine and pecan grove pump 85% of our groundwater from this basin. Everyone has gone along their merry way, hoping no one would find out the truth, just pumping and pumping our groundwater. They had the wells and grandfathered rights and no one could touch them. The politicians are afraid to do the right thing, as the lobbyist are very powerful and votes are more important than taking care of the people of Green Valley.

Over the past 25 months, there have been several groups here in Green Valley working together trying to determine just what are we facing, as the government agencies and politicians have completely let us down. The statistics on our looming water crisis in this basin are absolutely frightening.

First, we will address the Sierrita Mine (Phelps Dodge). From 1987 to 2006, this mine has pumped over 505,000 AF of groundwater from the old Canoa Ranch area. That equates to 23 million gallons per day. As we all know, there has been no means of recharge in the area except what small amount flows down the Santa Cruz River and rainfall. You just cannot pump that much groundwater, and not replenish it, without there being serious subsidence. Well guess what, that has started to happen. In the Canoa Verde and Canoa Azul area of Canoa Ranch, there are approximately eight homes, plus one swimming pool, that has faced serious foundation problems. It is only a matter of time before that whole area sinks maybe 4 to 9 feet. Further, that area has many golf courses, and they pump 600,000 gallons per day/per golf course.

Now, let's look at the area where the Rosemont mine will be pumping. In that area, well owners are already facing declines in the water levels. We

personally met a gentleman that lives off of Sahuarita Road where his well has dropped 60 feet in the past five years. In the next year, he will have to drill another well to the tune of over \$14,000 to secure a water supply (and for how long). You people must factor in the human consequences of what this new mine will create for all the well owners in that area.

Groundwater in this area flows from the Nogales area towards Marana. We already have less water coming down the Santa Cruz River (helps to recharge the Canoa area). Now if the new copper mine begins to draw down the groundwater in the Sahuarita area, it could possibly deplete the water in the Green Valley area even further. As that water level goes down, the Green Valley water would begin to flow towards Sahuarita at a faster rate. Groundwater knows no boundaries, there are no gates down there to tell it to stay here. So as the Green Valley area is receiving less water from the south, so could we further lose our groundwater faster to the north if the Sahuarita table begins to decline. And, it will. The only thing we do not know is when, but it will be sooner, rather than later. In possibly less than 10 years, how do you tell people 75 years of age and older that they have to go and get bottled water. Many are crippled and some with no means of transportation. Further, maybe they can only flush their toilets for two hours a day when the water is turned on. What do we do when the small water companies in Green Valley close their doors (there are six water companies here) because they cannot afford to drill deeper or dig new wells (not knowing how long that water will last). I have personally seen this happen, and believe me it is not a pretty picture. It cost the State of California and a County millions and millions to correct a problem that could have been prevented.

The National Environmental Policy Act, Section 101, Paragraph B pertains to Rosemont's activities of transporting groundwater away from Sahuarita that would interfere with the natural balance of the environments ability to maintain critical water levels for the overall development and welfare of the community. Rosemont's transportation of groundwater from Sahuarita, which is already suffering from groundwater depletion and subsidence, may cause a risk to health and safety of the residents with undesirable consequences to the community (wells drying up and property becoming worthless) and Rosemont's transportation of our groundwater could dramatically affect future growth in the community.

**IF YOU APPROVE FOR THE ROSEMONT MINE TO GO INTO PRODUCTION, THEY SHOULD ONLY BE ALLOWED TO USE CAP WATER (NO GROUNDWATER). REMEMBER, THIS IS A FOREIGN COMPANY THAT WILL BE REMOVING OUR PRECIOUS METAL TO BE SHIPPED OVERSEAS. WHY IN THE WORLD WOULD WE ALLOW THEM**

(FOREIGN ENTITY) TO DESTROY OUR GROUNDWATER BASIN. WHAT ABOUT THE POSSIBILITY OF DISPLACING AROUND 50,000 RESIDENTS IF OUR WATER SUPPLY ERODES. PLUS THE HOMES IN THIS BASIN WOULD BECOME WORTHLESS.

If you want proof of our groundwater overdraft in this basin, contact the Department of Water Resources, Pima County Flood Control and the Pima County Board of Supervisors.

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Gunnar and Peggy Bonthron  
Concerned citizens of Green Valley and  
representing over 700 couples

COPIES TO:

Governor Janet Napolitano

Senator Jon Kyl

Senator John McCain

Senator Tim Bee

Congresswoman Gabrielle Gifford

Congressman Raul Grijalva

Arizona Corporation Commission

Pima County Board of Supervisors

Department of Water Resources

Green Valley Recreation

Green Valley Community Coordinating Council

All Media Outlets



Pjbonthron@aol.com  
03/26/2008 02:18 PM

To beverson@fs.fed.us  
cc  
bcc  
Subject Letter Re Rosemont mine

Attached is a letter regarding the Rosemont mine. We will also send you a hard copy in the mail tomorrow.

Gunnar and Peggy Bonthron



Create a Home Theater Like the Pros. [Watch the video on AOL Home.](#) Forest Service Letter.doc

**GUNNAR & PEGGY BONTHRON  
421 NORTH MOUNTAIN BROOK DRIVE  
GREEN VALLEY, ARIZONA 85614  
520-399-1886**

March 27, 2008

Beverly Everson  
USDA Forest Service  
Coronado National Forest  
300 West Congress Street  
Tucson, Arizona 85701

Subject: Proposed Rosemont Mine

Dear Ms. Everson:

We have been following the proposed Rosemont Mine efforts and attending your recent public meetings. We wanted to attend these meetings and move around the crowds so we could hear first-hand input from the various communities. I am sure you found out, as we did, that there is strong opposition for this large mine being allowed in this area. People here are so stressed that our government, and your government agency, would allow such a thing like this to happen based upon the looming water shortage we are facing here. Many people that we spoke with said, "The Forest Service has already made up their mind to allow this mine to operate, these meetings are only window-dressing." We truly hope that this is not the case.

We hope you will take the time to read this entire letter and have a better understanding of the facts and what Green Valley/Sahuarita may be facing in just a few years as it relates to our water shortage.

As you well know, we have been in a drought situation for the past 10 years in Arizona. In many areas, more groundwater is being pumped than being replaced. This holds especially true in the Green Valley area. We have been in an overdraft situation for many years. For FY 2006, we had an overdraft of 40,000 AF. We have not received the figures for 2007, but it will be more than that because of the massive groundwater pumping by the copper mine, the pecan grove and golf courses. All are demanding more water due to higher temperatures in the summer and less rainfall. This is not a fantasy, but real facts. Note: When Sierra Vista had an annual overdraft of just over 4,000 AF, everyone got into a panic and wanted to address the issue, and did. Green Valley area has

an overdraft of over 40,000 AF annually, and no one seems to really care. There has been a lot of talk, but no sound action. Every day/month/year that goes by, only compounds the severity of the groundwater crisis. Government agencies and politicians perceive that we are all over 65 and maybe have less than 10-12 years, so why bother. Then a new group of retirees will move to town and we can continue to fool them for a while longer.

In 1998 when the Malcolm Pirnie Report was published, everyone knew (DWR, Pima County, copper mine, pecan grove) if we did not begin some type of groundwater recharge, the area was going to be in trouble. The proposed CAP pipeline was presented that would extend from Pima Mine Road to the Canoa Ranch area. Phelps Dodge and FICO (pecan grove) decided it was cheaper to pump groundwater, rather than do the right thing and they forfeited the offer of 23,000 AF of CAP water annually. Also, they did not want to assist financially with the extension of the pipeline. It is not up to the taxpayers to pay this bill, as the copper mine and pecan grove pump 85% of our groundwater from this basin. Everyone has gone along their merry way, hoping no one would find out the truth, just pumping and pumping our groundwater. They had the wells and grandfathered rights and no one could touch them. The politicians are afraid to do the right thing, as the lobbyist are very powerful and votes are more important than taking care of the people of Green Valley.

Over the past 25 months, there have been several groups here in Green Valley working together trying to determine just what are we facing, as the government agencies and politicians have completely let us down. The statistics on our looming water crisis in this basin are absolutely frightening.

First, we will address the Sierrita Mine (Phelps Dodge). From 1987 to 2006, this mine has pumped over 505,000 AF of groundwater from the old Canoa Ranch area. That equates to 23 million gallons per day. As we all know, there has been no means of recharge in the area except what small amount flows down the Santa Cruz River and rainfall. You just cannot pump that much groundwater, and not replenish it, without there being serious subsidence. Well guess what, that has started to happen. In the Canoa Verde and Canoa Azul area of Canoa Ranch, there are approximately eight homes, plus one swimming pool, that has faced serious foundation problems. It is only a matter of time before that whole area sinks maybe 4 to 9 feet. Further, that area has many golf courses, and they pump 600,000 gallons per day/per golf course.

Now, let's look at the area where the Rosemont mine will be pumping. In that area, well owners are already facing declines in the water levels. We

personally met a gentleman that lives off of Sahuarita Road where his well has dropped 60 feet in the past five years. In the next year, he will have to drill another well to the tune of over \$14,000 to secure a water supply (and for how long). You people must factor in the human consequences of what this new mine will create for all the well owners in that area.

Groundwater in this area flows from the Nogales area towards Marana. We already have less water coming down the Santa Cruz River (helps to recharge the Canoa area). Now if the new copper mine begins to draw down the groundwater in the Sahuarita area, it could possibly deplete the water in the Green Valley area even further. As that water level goes down, the Green Valley water would begin to flow towards Sahuarita at a faster rate. Groundwater knows no boundaries, there are no gates down there to tell it to stay here. So as the Green Valley area is receiving less water from the south, so could we further lose our groundwater faster to the north if the Sahuarita table begins to decline. And, it will. The only thing we do not know is when, but it will be sooner, rather than later. In possibly less than 10 years, how do you tell people 75 years of age and older that they have to go and get bottled water. Many are crippled and some with no means of transportation. Further, maybe they can only flush their toilets for two hours a day when the water is turned on. What do we do when the small water companies in Green Valley close their doors (there are six water companies here) because they cannot afford to drill deeper or dig new wells (not knowing how long that water will last). I have personally seen this happen, and believe me it is not a pretty picture. It cost the State of California and a County millions and millions to correct a problem that could have been prevented.

The National Environmental Policy Act, Section 101, Paragraph B pertains to Rosemont's activities of transporting groundwater away from Sahuarita that would interfere with the natural balance of the environments ability to maintain critical water levels for the overall development and welfare of the community. Rosemont's transportation of groundwater from Sahuarita, which is already suffering from groundwater depletion and subsidence, may cause a risk to health and safety of the residents with undesirable consequences to the community (wells drying up and property becoming worthless) and Rosemont's transportation of our groundwater could dramatically affect future growth in the community.

**IF YOU APPROVE FOR THE ROSEMONT MINE TO GO INTO PRODUCTION, THEY SHOULD ONLY BE ALLOWED TO USE CAP WATER (NO GROUNDWATER). REMEMBER, THIS IS A FOREIGN COMPANY THAT WILL BE REMOVING OUR PRECIOUS METAL TO BE SHIPPED OVERSEAS. WHY IN THE WORLD WOULD WE ALLOW THEM**

(FOREIGN ENTITY) TO DESTROY OUR GROUNDWATER BASIN. WHAT ABOUT THE POSSIBILITY OF DISPLACING AROUND 50,000 RESIDENTS IF OUR WATER SUPPLY ERODES. PLUS THE HOMES IN THIS BASIN WOULD BECOME WORTHLESS.

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**Arizona Corporation Commission**

**Pima County Board of Supervisors**

**Department of Water Resources**

**Green Valley Recreation**

**Green Valley Community Coordinating Council**

**All Media Outlets**



"Richard Calabro"  
<r.a.calabro@att.net>

03/28/2008 11:03 AM

Please respond to  
"Richard Calabro"  
<r.a.calabro@att.net>

To "Beverly Everson" <beverson@fs.fed.us>

cc

bcc

Subject Mar 28 '08 Article Attached.

Dear Beverly,

Today's story in the Tucson Citizen is more detail on the EIS Scoping meeting on Tuesday, March 18, at Desert Vista in Tucson. Please help the local communities in any way possible to save the scenic Santa Rita mountains from this proposed 3rd to 4th largest open pit copper mine in the U.S. A hole one mile in diameter and a half mile deep. Deny them their request for the 3,670 acres of our public National Forest land they want for their tailings. It clearly violates the Coronado National Forest Plan. There is far better public use of this land.

Sincerely yours,

Richard A. Calabro  
3055 S. Placita Del Avestruz  
Green Valley, AZ 85614-1000  
Tel. 520 648-0624  
Fax 520 648-0647  
e-mail: [r.a.calabro@att.net](mailto:r.a.calabro@att.net)

----- Original Message -----

**From:** [Ccook520@aol.com](mailto:Ccook520@aol.com)

**To:** [Ccook520@aol.com](mailto:Ccook520@aol.com)

**Sent:** Friday, March 28, 2008 8:32 AM

**Subject:** Proposed Rosemont Project- Bussing People to meeting at Desert Vista- Article

Article in 03-28-08 Tucson Citizen on the bussing of people to the Desert Vista proposed Rosemont/Forest Service meeting. Several of EFC members were at this meeting and saw all these people getting off the bus. I was there but did not know these details. This is sadder than I thought.



<http://www.tucsoncitizen.com/ss/local/80975.php> Augusta Busing Stunt.doc

7285

## Denogean: Stunt pulled by mining firm just shameless

ANNE T. DENOGEAN Tucson Citizen

The woman from Rosemont Copper who appeared at the door of the South Side apartment shared by Olivia Aguilar and Willie Hill about two weeks ago must have seemed like the answer to a prayer.

She wasn't there to sell them anything, she promised. She wanted to talk to the two, both of whom happen to be recently unemployed, about high-paying jobs for Tucsonans. All they had to do was be treated to dinner by Rosemont and attend a meeting. If they didn't have a ride, the company would provide one.

Aguilar, 25, and Hill, 31, were excited but completely unaware that they were about to be part of a shameless stunt by Rosemont to pack a March 18 public hearing in Tucson with shuttled-in, sham supporters of its plans to mine the Santa Rita Mountains.

Before the hearing held by the U.S. Forest Service as part of an environmental impact statement on the proposed copper mine, Rosemont representatives went knocking on doors at various locations, including the sprawling apartment complex on South Campbell Avenue near the airport.

The "community outreach team," as Rosemont calls it, was rounding up "supporters" to appear on the company's behalf.

The pitch was less than straightforward. Aguilar and Hill, who are raising four children and paid this month's rent with tax refund money, said they thought they were being recruited for mine jobs. They didn't know there are no jobs now and won't be for at least two years.

"They frigging lied so they could get our damn signatures on that list," Aguilar said.

Supervisor Ray Carroll, the most vocal opponent of Rosemont, is disgusted. Rosemont took advantage of people who are struggling to make it in a tough economy and thought it would get away "with treating them like they are so dumb that they wouldn't figure it out," he said this week.

Aguilar and Hill drove themselves to the dinner at Bennigan's, which Hill estimated was attended by 50 to 75 people. The couple also recruited Hill's sister, another job-seeker, to attend.

Aguilar noticed that nobody was taking applications. The only reference to jobs was a suggestion to leave a résumé with a company representative before heading in their own vehicles or in one of the shuttles provided by organizers to the public meeting at Pima Community College's Desert Vista campus.

Hill walked into the meeting at Desert Vista with a full belly, a hopeful attitude and a company-provided button reading "ROSEMONT COPPER, Great Jobs, Great Benefits" pinned to his shirt. He was immediately greeted with a disparaging remark by a mine opponent that made him realize he had walked into a political fight that he knew nothing about and in which he had no interest.

Though Hill laughed as he told the story, his disappointment was clear.

"I just wanted a job, a good job, to take care of my family," he said.

Juan Rascón, a mine opponent who attended the hearing, said he noticed the people coming off the buses. They were mostly young, including couples who brought their children with them, and predominantly Hispanic, he said. He estimated there were at least 100 people.

"It was quite an impressive show of force," Rascón said.

Rascón said organizers appeared to be moving them in and out of the meeting in an orderly manner - having them sign the green public comment sheets indicating their support for Rosemont and return to the waiting buses.

He said at least one person wearing a Rosemont button had the impression that signing the green sheets was required to get on a job list.

Rascón said Rosemont's tactics reminded him of Mexican political parties combing the countryside and offering hats and blankets to poor farmers to show up at political rallies.

The mine "supporters" he spoke to knew little about Rosemont, but clearly "were there with the dream of getting one of these jobs."

The ones that don't exist.

Rascón, who said he had been a silent opponent of the mine, was so angry he approached Jamie Sturgess, Rosemont's vice president of sustainable development, to give him a message.

"As of tonight, you've lit me up, you've transformed me," he said.

He wasn't alone. Aguilar and Hill stayed to learn more and didn't like what they heard about the proposed mine's possible impact on water supplies and the environment. "As soon as we found out what was going on, we were taking off our buttons," Aguilar said.

On March 19, Sturgess apologized for the confusion in a written statement but defended Rosemont's "community outreach" efforts.

Jan Howard, a spokeswoman with Strongpoint, Rosemont's public relations group, said in a phone interview Wednesday that dinner was offered because the meeting was at the dinner hour and asked what was wrong with providing rides to people. She said Rosemont brought in no more than a couple of dozen supporters. And, she said, Rosemont's intent was to inform people of the potential benefits of the mine, not to mislead people about jobs.

"Sometimes people hear what they want to hear," she said.

Really? Aguilar gave me two informational sheets left with her by the Rosemont rep. One, to be fair, described the environmental impact statement process.

The other - the attention grabber - looked like what you pick up at a job fair. The "Rosemont Copper Career Opportunities" sheet talked about its plans to employ 500 people. The paper detailed the types and numbers of jobs that will be available. It promised a generous benefits package and noted that experienced workers in Arizona's copper industry earn an average of \$59,000 a year.

Rosemont, along with its parent company, Canadian-based Augusta Resource Corp., has made lots of promises to southern Arizona, all of which boil down to a pledge to be a good corporate citizen.

To put it bluntly, this cheap attempt to corrupt the public hearing process reflects poorly on the ethics and corporate character of Rosemont. And it earned it at least two new opponents.

Before Aguilar and Hill left the March 18 hearing, they made a point of signing a petition against the mine.

*Anne T. Denogean can be reached at [adenogean@tucsoncitizen.com](mailto:adenogean@tucsoncitizen.com) and at 573-4582. Her columns run Tuesdays and Fridays.*



Heidi Schewel/R3/USDAFS

06/28/2008 07:19 PM

To Beverley A Everson/R3/USDAFS@FSNOTES

cc

bcc

Subject Fw: Rosemont Mine Proposal

Bev, I'm cleaning out my inbox and I found this. I think I forwarded everything as I got it, but I'm sending this just in case. Thanks, Heidi

Heidi Schewel  
Coronado National Forest  
Media Officer, Fire Information  
Office of Forest Communications  
Collateral: FOET Chair  
(520) 749-7720 FAX (520) 749-7723

----- Forwarded by Heidi Schewel/R3/USDAFS on 06/28/2008 07:18 PM -----



"Wilsey, Karen"  
<Karen.Wilsey@tusd1.org>

03/31/2008 08:45 AM

To <hschewel@fs.fed.us>,

<omments-southwestern-coronado@fs.fed.us>

cc

Subject Rosemont Mine Proposal

Dear Ms. Sshewel:

I am deeply concerned about this proposed mine along with several other mining lease renewals in the Empire Mountains. I have been working closely with the Empire Fagan Coalition and Pima County opposing these renewals. I am not apposed to mining but the area that these mines, specifically Rosemont, will be detrimental to our eco system, water way in Davidson Canyon, and impact tourism to Sonoita, Patagonia and the use of the Arizona Trail on Old Sonoita Highway. Given all of these factors, this location in SE Pima County is a disastrous idea! I urge you to critically review and evaluate the full repercussions of the mining in this area. Reclamation will not happen – and we as a community in Southern Arizona will lose so much to a foreign owned company who does NOT care what the end result will be.

Sincerely –

Karen Wilsey  
Vail Resident  
16905 S. Empire View Road

*Karen Wilsey*  
*Post Secondary Counselor*  
*520-225-5102*



Heidi Schewel/R3/USDAFS  
06/28/2008 07:20 PM

To Beverley A Everson/R3/USDAFS@FSNOTES  
cc  
bcc  
Subject Fw: Proposed Rosemont Mine

This came twice so I'm forwarding both versions. They have different time stamps.

Heidi Schewel  
Coronado National Forest  
Media Officer, Fire Information  
Office of Forest Communications  
Collateral: FOET Chair  
(520) 749-7720 FAX (520) 749-7723

----- Forwarded by Heidi Schewel/R3/USDAFS on 06/28/2008 07:20 PM -----



"Wilsey, Karen"  
<Karen.Wilsey@tusd1.org>  
03/31/2008 09:05 AM

To <hschewel@fs.fed.us>  
cc  
Subject Proposed Rosemont Mine

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*520-225-5102*



Heidi Schewel/R3/USDAFS

06/28/2008 07:19 PM

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bcc

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----- Forwarded by Heidi Schewel/R3/USDAFS on 06/28/2008 07:18 PM -----



"Wilsey, Karen"

<Karen.Wilsey@tusd1.org>

03/31/2008 08:45 AM

To <hschewel@fs.fed.us>,

<omments-southwestern-coronado@fs.fed.us>

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16905 S. Empire View Road

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*520-225-5102*



Michael A Linden/R3/USDAFS

04/01/2008 01:27 PM

To Beverley A Everson/R3/USDAFS@FSNOTES, Jeanine Derby/R3/USDAFS@FSNOTES

cc

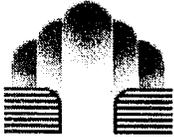
bcc

Subject Fw: New Controlled correspondence # 5350779

Bev, Jeanine....can you look over the e-mail from Judy Brydon below..... It concerns the Patagonia public meeting for Rosemont. If you all have been answering other similar inquiries....& get me something in draft....I'll pull it together and get it back to the WO, M&G director, Tony Ferguson.

Michael A. Linden, Regional Geologist  
USDA Forest Service, Southwestern Region  
333 Broadway, S. E., Albuquerque, NM 87102  
(505) 842-3158 Fax (505) 842-3152  
e-mail: mlinden@fs.fed.us

----- Forwarded by Michael A Linden/R3/USDAFS on 04/01/2008 02:23 PM -----



Michael Doran/WO/USDAFS

03/27/2008 11:21 AM

To Michael A Linden/R3/USDAFS@FSNOTES

cc

Subject Fw: New Controlled correspondence # 5350779

Mike, down below is the letter about the Rosemont public meetings.

Mike Doran  
National Locatable Minerals Program Leader  
USDA, Forest Service  
Minerals and Geology Mgt.  
1249 S. Vinnell Way, Suite 200  
Boise, ID 83709  
Ph: (208) 373-4132  
FAX (208) 373-4111

----- Forwarded by Michael Doran/WO/USDAFS on 03/27/2008 11:20 AM -----

Delores Glenn/WO/USDAFS

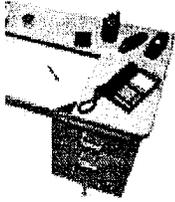
03/27/2008 09:20 AM

To Michael Doran/WO/USDAFS@FSNOTES

cc Willette Squire/WO/USDAFS@FSNOTES

Subject Fw: New Controlled correspondence # 5350779

Hi Mike! Can you please work with Mike Linden in drafting a response for this correspondence, with Tony's signature. Per Tony's instructions. Thanks, Dee  
----- Forwarded by Delores Glenn/WO/USDAFS on 03/27/2008 11:15 AM -----



Willette Squire/WO/USDAFS

03/26/2008 01:29 PM

To Delores Glenn/WO/USDAFS@FSNOTES

cc Kimbra Gillis/WO/USDAFS@FSNOTES

Subject New Controlled correspondence # 5350779

Hello,

Attached is a new controlled correspondence # 5350779. It is an OES 30, designated to be signed by staff director or acting. It has a due date of April 7, 2008.

Please be sure to include CRM (willette) as a reviewer prior to being signed by staff director.

Give me a call if any questions.

Thanks kindly for your cooperation,

willette : )



CoverSheet-5350779.pdf



5350779.txt

Willette Squire / USDA Forest Service / Correspondence & Records Management / t: 202-205-1013 / f: 202-205-0975 e: wsquire@fs.fed.us

**USDA ECM  
COVER SHEET**

**Control Number: 5350779**

**03/26/2008**

<b>Control Number:</b>	5350779	<b>Status:</b>	Active
<b>Folder Owner:</b>		<b>Processing Code:</b>	OES30
<b>Mission/Staff:</b>	Office of the Executive Secretariat (OES)	<b>Agency:</b>	None
<b>Division:</b>	None	<b>Group:</b>	Main Group
<b>Action Organization:</b>			
<b>Mission/Staff:</b>	Natural Resources and Environment (NRE)	<b>Agency:</b>	Forest Service (FS)
<b>Division:</b>	None	<b>Group:</b>	Main Group
<b>Correspondent:</b>	Brydon, Judy	<b>Date on Letter:</b>	03/21/2008
<b>Addressee:</b>	Schafer, Edward T.	<b>Received Date:</b>	03/24/2008
<b>Referrer:</b>		<b>Referrer Due Date:</b>	
<b>Subject(s):</b>	COMPLAINT		
<b>Synopsis:</b>			
<b>Final Signer(s):</b>		<b>Date Signed:</b>	
<b>VIP Type:</b>		<b>Special Instructions:</b>	
<b>Special Attention:</b>			

#	Assignee	Task	Status	Actual User	Assigned Days	Due Date	Date Received	Date Completed	Days Over Due
1	OSEC/OES/None/ None/MG/Folder Setup Group	Set Up Folder	Completed	Stephanie Proctor	1	03/25/2008	03/24/2008 10:00:31 AM CDT	03/24/2008 02:44:01 PM CDT	-1
2	OSEC/OES/None/ None/MG/Priority Group 3	Preparation	Completed	Stephanie Proctor	1	03/25/2008	03/24/2008 02:44:01 PM CDT	03/26/2008 06:50:17 AM CDT	+1
3	OSEC/NRE/FS/ None/MG/Agency	Signature	Completed	Zena Conerly	9	04/08/2008	03/26/2008 06:50:17 AM CDT	03/26/2008 08:04:20 AM CDT	-9
3.1	Willette Squire(OSEC/NRE/ FS/None)	Final Response	Started	Willette Squire	8	04/07/2008	03/26/2008 08:04:20 AM CDT		-8
3.2	Zena Conerly(OSEC/ NRE/FS/None)	Signature - Subflow Return	Not Started		1	04/08/2008			-9
4	OSEC/Alias/ Alias/Alias/MG/ CMAgency	Signature Verification	Not Started		1	04/08/2008			-9
5	OSEC/Alias/ Alias/Alias/MG/ MFCAgency	Close Folder	Not Started		1	04/09/2008			- 10





United States  
Department of  
Agriculture.

Forest  
Service

Coronado National Forest  
Supervisor's Office

300 W. Congress  
Tucson, Arizona 85701  
Phone (520) 388-8300  
FAX (520) 388-8305  
Deaf & Hearing Impaired 711

File Code: 1500-1

Date: May 28, 2008

Mr. Robert Harris  
20960 S. Total Wreck Lane  
Vail, AZ 85641

Dear Mr. Harris:

Thank you for your inquiry regarding excavation near the Rosemont Junction area. We have reviewed the information you provided and determined that the work was authorized.

As you may know, Rosemont Mining Company operates a cattle ranch on their private land. In addition, they also have a range permit with the Forest Service that allows cattle grazing on adjacent National Forest System land. Kendall Brown, the Range Conservationist on the Nogales Ranger District, administers that permit. He has reviewed the information you provided and has identified the work as required under the terms of Rosemont Mining Company's range permit and their allotment management plan.

Kendall says this work was maintenance of an existing range improvement – in this case a stock tank used for watering cattle. Range permittees are often required to clean out stock tanks, which tend to silt in over time. Mr. Tom Kay, the Rosemont Ranch Manager, notified Kendall of the work, which also included applying a sealant to the tank (bentonite clay), as well as improving access to the tank. This was routine, approved work similar to the type that occurs on range allotments across the Coronado National Forest.

Obviously, the Rosemont Junction area is a busy area with mineral exploration activity ongoing on Rosemont's private property, as well as an active cattle ranch on their property and on the Coronado National Forest, not to mention a considerable amount of recreation occurring on both private and Forest land. In addition, the company is initiating hydrogeologic and geotechnical drilling investigations on Forest in the Rosemont Valley area. The description and location of that activity is described in a Decision Memorandum available on our website at [www.fs.fed.us/r3/coronado/rosemont](http://www.fs.fed.us/r3/coronado/rosemont).

Thanks for giving us the opportunity to clarify this issue. We appreciate your concern and for providing the photos and GPS location to help us positively identify the area in question. If you have any future questions about activity in the Rosemont Junction area, please contact John Able by email at [jable@fs.fed.us](mailto:jable@fs.fed.us) or cell phone at 520-405-4256.

Sincerely,

JEANINE A. DERBY  
Forest Supervisor



**Correspondence Document Summary**

**USDA Forest Service**

**SO Formal Template**

**Finalized**

**Signed  
May 28, 2008**

**R3  
Coronado NF**

* <b>File Codes:</b> 1500-1	
<b>Control Number:</b>	
* <b>To:</b>	<b>Name:</b> Mr. Robert Harris <b>Title:</b> <b>Organization:</b> <b>Street:</b> 20960 S. Total Wreck Lane <b>Line 2:</b> <b>City, State, Zip:</b> Vail, Arizona 85641
<b>cc:</b>	
<b>Email To:</b>	
* <b>Subject:</b> Inquiry Regarding Excavation in Rosemont Junction Area	
* <b>Categories:</b> R3 Coro MIN, R3 Coro SOIL, R3 Coro D2	
* <b>Finalized Signatures:</b> JEANINE A. DERBY	
* <b>These fields must be entered before the letter can be finalized</b>	

Co-authors: John Able/R3/USDAFS



SO formal

**Review Information**

**Simultaneous Review**

Reviewers' instructions: Original doc was first created in a Informal templet by John Able. Entire text of that doc was pasted into this record.

**Sequential Review**

<b>Current Reviewer</b>	<b>Still To Review</b>	<b>Reviewers Concurring</b>	<b>Reviewers Not Concurring</b>
		Carl Ostermann/R3/USDAFS	None

**Review Comments**

Carl Ostermann/R3/USDAFS concurs, 05/28/2008 08:27:18 AM MST

All reviews completed

**Document History**

Created 05/28/2008 07:45:53 AM MST by Carl Ostermann from template SO Formal  
 Letter edited by Carl Ostermann at 05/28/2008 07:57:29 AM MST.  
 Letter edited by Carl Ostermann at 05/28/2008 08:02:37 AM MST.  
 Submitted for review at 05/28/2008 08:02:40 AM MST by Carl Ostermann  
 Letter edited by Carl Ostermann at 05/28/2008 08:12:33 AM MST.  
 Review completed 05/28/2008 08:27:18 AM MST  
 Letter edited by Carl Ostermann at 05/28/2008 08:27:19 AM MST.  
 Letter edited by Carl Ostermann at 05/28/2008 02:17:34 PM MST.

JEANINE A. DERBY finalized by Carl Ostermann at 05/28/2008 02:17:37 PM MST.  
All signatures final, 05/28/2008 02:17:37 PM MST.

---

**Mailing History**

05/28/2008 02:18:52 PM MST: sent to John Able/R3/USDAFS; Carl Ostermann/R3/USDAFS



Mary M Farrell/R3/USDAFS  
04/01/2008 11:04 AM

To Steve\_in\_Arizona <nitroxr2003@yahoo.com>  
cc jmadsen@u.az.edu, Beverley A  
Everson/R3/USDAFS@FSNOTES, Andrea W  
Campbell/R3/USDAFS@FSNOTES, William B  
Gillespie/R3/USDAFS@FSNOTES, Janet  
Jones/R3/USDAFS@FSNOTES

bcc

Subject Re: Rosemont Mine Plan and Arizona Historic Site Survey

Dear Dr. Chrisman,

Thank you for your email, both for the information you provide and the issues you bring up. We do know that there are archaeological and historical sites in the proposed project area. Nearly all of the project area has been subject to previous cultural-resource investigations made in conjunction with an earlier proposed large-scale copper mine and associated land exchange, the ANAMAX Company's proposal of the 1970s-1980s. For that proposal, the Arizona State Museum conducted archaeological survey, testing, and data recovery in a large area around Rosemont. These investigations identified over 130 archaeological sites either within the current Rosemont project area, or within one mile of it. The sites cover a range of occupation from approximately 7,000 years ago to the present. However, neither the land exchange nor mine development originally proposed by ANAMAX took place. Since that time, the State Museum has discontinued its Cultural Resource Management division, and no longer conducts surveys and excavations for projects such as this.

Although the previous archaeological investigations were thorough for the time, much has transpired in the past quarter century: identification and recording standards have changed, and research questions have evolved. The Native American Graves Protection and Repatriation Act (NAGPRA), revisions to the National Historic Preservation Act and implementing regulations, and other laws and executive orders emphasize greater tribal consultation. So, the Forest Service is planning to request additional work to evaluate the effects of the mining proposal on cultural resources, including completion of an ethnohistory review and evaluation; a new Class III inventory (100 percent survey) of the Area of Potential Effect; reconciliation of new survey data with previous testing and data recovery investigations; review of new sites and previously investigated sites, to develop a mitigation plan (possibly including research and data recovery).

All work will be overseen by the Forest Service and done in consultation with the State Historic Preservation Office. Tribes with ties to the area have been invited to be consulting parties, per the National Historic Preservation Act. The initial work will be conducted by SWCA, a firm well-qualified to do archaeological investigations. Under the terms of the permit that authorizes them to do the work, they are overseen by the USFS and have to meet professional standards. Nevertheless, we welcome comments and ideas from the State Museum, other professional archaeologists, and the public. To that end, I'll ask that a copy of your email be added to the official file, so that it can be considered throughout the DEIS process. Please feel free to contact me if you have

further questions or comments.

Mary M. Farrell  
Forest Archaeologist  
Coronado National Forest  
300 W. Congress  
Tucson, AZ 85701  
(520) 388-8391  
(520) 388-8305 (fax)  
Steve\_in\_Arizona <nitroxe2003@yahoo.com>



Steve\_in\_Arizona  
<nitroxe2003@yahoo.com>  
03/28/2008 10:07 AM

To mfarrell@fs.fed.us, jmadsen@u.az.edu  
cc

Subject Rosemont Mine Plan and Arizona Historic Site Survey

Dear Ms Farrell and Mr Madsen:

I have been referred to you by the Director of the AZ State Museum; as experts in Arizona History and cultural preservation. I have concerns regarding a proposed copper mine which will cover about 1000 acres in the Santa Cruz valley; an area inhabited by communities of man since 7500BC.

The area involved has played a pivotable part in AZ history and the history of the Cochise Culture, the Hohokam, the Tchoowaka, the Oodham, the Spanish Conquest, the Pima, the Catholic Mission movement, the mines, ranching history, and as an area of national parks, the CDC restorations/landmarks, and Madera Canyon.

I'm afraid un-restored sites related to Arizona history will be lost to open pit mining in an area that has acknowledged historical and cultural importance. The modern history of the area goes back to 1680. The ancient history of the area dates back at least 10,000 years.

I'd appreciate your taking a look at the area involved in the Rosemont Mine Plan (page 91, attached) and seeing if there are known native religious, archaeological, or historical sites that may be damaged or desecrated by the proposed Rosemont Mine.

I'm sending a copy of the Rosemont Mine Plan in which they reference they will employ a single private contractor to see that no sites of interest are destroyed. I would think the State Museum would want a say in who gets hired in ensuring the qualifications of such an individual.

The Rosemont Mine proposed project is in the NEPA EIS information gathering stage; a stage that will be over 19 May 2008, at which time the FEIS will be prepared. I would think that the State Museum would also want a say in the review of the FEIS, a document that will be out for

comment for just 45 days when it is finished. The State Forest Service is the action agency for the Rosemont Mine EIS.

The open period for comments on the Rosemont mine project is until 19 May 2008. The address for constructive comments is listed below. Ask for a receipt of your comment or you won't know it was received.

The address:

[Comments-southwestern-coronado@fs.fed.us](mailto:Comments-southwestern-coronado@fs.fed.us)

Thank you.

Dr. Stephen Chrisman (Retired Family Doctor)  
Sahuarita, Az  
85629

---

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Rosemont Plan of Operations.pdf



Heidi Schewel/R3/USDAFS  
06/28/2008 07:21 PM

To Beverley A Everson/R3/USDAFS@FSNOTES  
cc  
bcc  
Subject Fw: Rosemont mine

Heidi Schewel  
Coronado National Forest  
Media Officer, Fire Information  
Office of Forest Communications  
Collateral: FOET Chair  
(520) 749-7720 FAX (520) 749-7723

----- Forwarded by Heidi Schewel/R3/USDAFS on 06/28/2008 07:21 PM -----



Bryce or Sally  
<bsrsvn@azwildblue.com>  
04/09/2008 08:44 PM

To hschewel@fs.fed.us  
cc  
Subject Rosemont mine

Dear Ms. Schewel,

I find your 3/24/08 & your 4/2/08 News Releases ambiguous as to the terminology pertaining to the "comment" period and the "scoping" period deadlines.

The public only cares about the date that they need to respond by, for *valid* objections in order to be considered *valid* objections by the forest service. Is it the "comment" period (which seems to be somewhat never ending) or the "scoping" period (which is ambiguous as it relates to the "comment" period.) that the public needs to be concerned about?

I hereby request (actually, as a tax payer, "demand") that you issue a new "News Release" clarifying your terms "comments" and "scoping" and make if very clear to the public what deadline must be met in order for the forest service to legally accept public objections.

Many thanks,

Sally Reichardt

Roxanne  
Runkel/DENVER/NPS@NPS

04/14/2008 12:14 PM

To Beverley A Everson/R3/USDAFS@FSNOTES

cc Dale Morlock/WASO/NPS@NPS, Ellen  
Singleton/WASO/NPS@NPS, Patricia  
Port/PEP/OS/DOI@DOI, Meg Weesner/SAGU/NPS@NPS

bcc

Subject No Comment ER

Hi Beverley,

The National Park Service has no comments at this time on:

ER-08/0357 - Rosemont Copper Project, Coronado National Forest

Thank you,  
Roxanne

---

Roxanne Runkel  
National Park Service  
Planning & Environmental Quality  
IMDE - OPE  
12795 W. Alameda Pkwy.  
Lakewood, CO 80228-2822  
Phone: (303) 969-2377 FAX: (303) 969-2063  
roxanne\_runkel@nps.gov

---



"Richard Calabro"  
<r.a.calabro@att.net>

04/16/2008 11:02 AM

Please respond to  
"Richard Calabro"  
<r.a.calabro@att.net>

To "Kim Beck" <kim@scenicsantaritas.org>  
cc "Victoria Ames" <Victoria.Ames@pima.gov>, "Lori Andersen" <Lori@sonorandesert.org>, "Ron Barber" <ron.barber@mail.house.gov>, "Senator Tim Bee" <tbee@azleg.gov>, "Dan Brocious" <brocious@carpincho.sao.arizona.edu>, "Carolyn Campbell" <Carolyn@sonorandesert.org>, "Mike Carson" <sapiputih@mac.com>, "Supervisor Ray Carroll" <district4@pima.gov>, "Charlotte Cook" <Cook520@aol.com>, "Scott Egan" <Scott.Egan@pima.gov>, "Empire-Fagan Coalition" <info@empirefagan.org>, "Beverly Everson" <beverson@fs.fed.us>, "Roger Featherstone" <rfeatherstone@earthworksaction.org>, "Carolyn Fowler" <fowlcf@peoplepc.com>, "Nancy Freeman" <nancy@savethesantacruzquifer.info>, "Nicole Fyffe" <Nicole.Fyffe@pima.gov>, "US Representative Gabriel Giffords" <az08ima@mail.house.gov>, "Kendall Kroesen" <kkroesen@tucsonaudubon.org>, "Lainie Levick" <lainiel@comcast.net>, "Tamarack Little" <Tamarack.Little@mail.house.gov>, "Patrick McKenna" <Patrick.McKenna@pima.gov>, "Christina McVie" <cmcvie@desertwatch.org>, "Tom Purdon" <tfpurdon@cox.net>, "Roxanne M. Raley" <rmralley@fs.fed.us>, "Keith Siebers" <ksiebs@mindspring.com>, "Sean Sullivan" <Sean@sonorandesert.org>, "Carol Tahse" <ctahse@yahoo.com>, "June Wortman" <junesrag@cox.net>, "Gabe Zimmerman" <Gabe.Zimmerman@mail.house.gov>

bcc

Subject Fw: FS Scoping Meetings for Proposed Rosemont Mine.

Kim,

I am forwarding to Save the Scenic Santa Ritas my guest comment submitted this morning to editor James Bennett of the Green Valley News and Sun, and copying other interested parties.

Richard

----- Original Message -----

**From:** Richard Calabro

**To:** James Bennett

**Sent:** Wednesday, April 16, 2008 10:40 AM

**Subject:** FS Scoping Meetings for Proposed Rosemont Mine.

Dear James Bennett:

I am submitting the attached Guest Comment and Bio on the Forest Service scoping meetings for the proposed Rosemont mine.

Sincerely yours,

Richard A. Calabro  
3055 S. Placita Del Avestruz  
Green Valley, AZ 85614-1000  
Tel. 520 648-0624  
Fax 520 648-0647



e-mail: [r.a.calabro@att.net](mailto:r.a.calabro@att.net) Apr 16 '08 Guest Comment.doc

Guest Comment by Richard A. Calabro, 3055 S. Placita Del Avestruz, Green Valley  
520 648-0624, r.a.calabro@att.net

I attended the Forest Service Environmental Impact Statement (EIS) scoping meetings in Green Valley on March 19, and in Vail on April 5. At the Vail meeting I was pleased to see that some of the Forest Service agreements made on March 27 with Representative Gabrielle Giffords had been implemented. There were signs on the wall above the tables to tell people who they were talking to. I found the "Resources" signs above the Forest Service tables confusing. Why not say "Forest Service"?

There was a "Consultants" sign. Additionally, I suggest signs so that each company is in context. For example: "SWCA. The environmental consulting company selected by the Forest Service to do the EIS. SWCA is paid by the mining company. The Forest Service does not control the amount of their contract. The Forest Service is responsible for the scope and accuracy of the EIS."

The local communities want the Forest Service to protect the environment. If an environmental consultant is doing the EIS, they want someone who is putting the environment's interest before the mining company's. The public should be given this information and decide for themselves if there's a conflict of interest. I feel there is.

At one table there was a video by M3 Engineering, and I talked to their representative, Daniel Roth. It showed an open pit copper mine. I said that's what they want to do to these beautiful Santa Rita mountains; a hole a mile wide and a half mile deep. He said the mining company is required to post money up front for reclamation. I said there's never been an open pit copper mine that was reclaimed as agreed. He said this one is different; that he is able to do reclamation while mining is still in progress. I say reclamation is a gross misnomer. The damage done by these mines goes far beyond anything that can be reclaimed, that's why people object so vehemently.

At this point the oral explanation of the EIS process was given. It was agreed to be done at the start of the meeting. It came about a half hour into the meeting. Also there was a small paper handout with a brief explanation of the EIS process. I don't know if this paper is intended to satisfy the agreed upon written explanation of the EIS. If so, it lacks the detail required. Both the oral and written explanation should introduce the companies and put them in context.

There was no one at this EIS scoping meeting who was prepared to tell the local community even one reason why it's not good for the environment to put an open pit copper mine in these mountains. So there's not much gained by these meetings other than to give mine proponents a chance to talk you out of your opposition. You're not going to gain anything by arguing with them. Their minds are made up. They are all making money off of this proposed mine.

The environmental organizations, who had very good reasons to share for not putting this proposed mine in these mountains, were not in the room. At the Green Valley scoping meeting, Green Valley Recreation, Inc., who provided the venue for the meeting, did not even allow them outside the room or outside the building. Nowhere on their property. The Vail school district, true to their education mission, did allow environmental organizations to set up tables outside the school building.

There is something gravely wrong with this National Environmental Policy Act's Environmental Impact Statement process when no one in the scoping meetings will educate the local community and the Forest Service on the serious detrimental impacts to the environment from this mining proposal. When only proponents of the proposed mine are asked to participate is it any wonder the public says the process is flawed, and at the Patagonia scoping meeting they openly expressed their outrage?

Another agreement made by the Forest Service with Representative Giffords is to allow a community work group to participate in the EIS process to assure that public concerns regarding the proposal are addressed. In the oral explanation of the EIS process it was stated that during the projected one year to do the draft EIS the Forest Service will work with cooperating agencies. In the spirit of this agreement, why not invite them into the discussion now during this scoping process?

For the next two scoping meetings on April 22 and April 23 the Forest Service has a chance to show good faith by offering tables inside the meeting room to environmental organizations and cooperating agencies.

Bio

Richard Calabro is a member of Save the Scenic Santa Ritas. The April 22 meeting is from 6-8 pm at the Sahuarita High School Cafeteria, 350 W Sahuarita Rd., Sahuarita. The April 23 meeting is from 6-8 pm at the Elgin Elementary School Cafeteria, 293 Upper Elgin Rd., Elgin.



"charles young"  
<clyoung5@cox.net>  
04/19/2008 12:18 PM

To <beverson@fs.fed.us>  
cc  
bcc  
Subject Mining

Dear Beverley Everson,

Thank you for opening all these meetings on the proposal of Augusta.

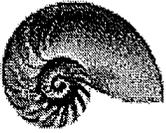
We know you have a very difficult job of evaluating all the data..pro and con.

I truly believe anyone who even thinks of working for the Forest Service is because they care about the woodland, the forests and are environmentally conscious people.

That is why I want to encourage you to weigh the pros and cons of our forest land use and make the decision that you must make down the line.

I find it hard to imagine your decisions would be allowing something to happen that can be avoided and believe you will view the forest land as an inappropriate place to "dump" their left over trash.

Thank you for hearing me out,  
Appreciatively,  
Lorraine Young  
2148 W. Calle Casas Lindas  
Green Valley, Arizona 85614



Roger D  
Congdon/R3/USDAFS  
04/25/2008 06:50 AM

To Beverley A Everson/R3/USDAFS@FSNOTES, Salek  
Shafiqullah/R3/USDAFS@FSNOTES

cc

bcc

Subject Fw: Tunnel through Santa Ritas

Do you guys know anything about this? They only sent it to me in the FS, from what I can tell. I had to reattach the attachment here, from Fred Tahse:



Rosemont dump on western slope.doc

Roger D. Congdon, PhD  
Hydrogeologist  
USDA Forest Service  
333 Broadway Blvd SE  
Albuquerque, NM 87102  
(505)842-3835  
FAX: (505)842-3152

----- Forwarded by Roger D Congdon/R3/USDAFS on 04/25/2008 07:48 AM -----



"Richard Kamp"  
<bepdick@att.net>  
04/24/2008 10:55 PM

To "Fred Tahse" <fwtahse@gmail.com>, "Annie McGreevy" <anniemcgreevy@gmail.com>, "Quentin Lewton" <qlewton@gmail.com>, "Kim Beck" <coyotes@cox.net>, "Gail Bernstein" <grs@shawe.com>, "Gayle Hartmann" <gayleh@theriver.com>, "George Trigaux" <waxwing@theriver.com>, "Lainie Levick" <lainiel@comcast.net>, "Lee Hydeman" <hydemanaz@hotmail.com>, "Morris Farr and Molly Anderson" <andfar\_975@msn.com>, "Nancy McCoy" <nancymccoy@hotmail.com>, "Roger Featherstone" <rfeatherstone@earthworksaction.org>, "Julia Fonseca" <Julia.Fonseca@pima.gov>, "Roger Congdon" <rcongdon@fs.fed.us>, "Robert Robuck" <rrobuck70@peoplepc.com>, "Frank Raymond" <iluvh2o2@att.net>, "Doug Larson" <doug@surgery.arizona.edu>, "Jeneiene Schaffer" <jschafferaz@gmail.com>

cc

Subject Re: Tunnel through Santa Ritas

You're in high gear Fred. Dick

----- Original Message -----

**From:** Fred Tahse

**To:** Annie McGreevy ; Quentin Lewton ; Richard Kamp ; Kim Beck ; Gail Bernstein ; Gayle Hartmann ; George Trigaux ; Lainie Levick ; Lee Hydeman ; Morris Farr and Molly Anderson ; Nancy McCoy ; Roger Featherstone ; Julia Fonseca ; Roger Congdon ; Robert Robuck ; Frank Raymond ; Doug Larson ; Jeneiene Schaffer

**Sent:** Thursday, April 24, 2008 10:26 PM

**Subject:** Tunnel through Santa Ritas

Hi Annie

In response to your request for comments about the new Rosemont study to drive a tunnel through the Santa Ritas for a slurry pipe and return pipe, I've included my thoughts in the attached document.

Fred

## A Rosemont Dump On the Western Slope of the Santa Ritas

Rosemont is examining the feasibility of driving a tunnel through the Santa Ritas and running slurry pipes through the tunnel to create a tailings dump on the western side of the mountain is a bit of a surprise. That's going to shock a lot of people in the Santa Cruz Valley. People in Sahuarita, Quail Creek, Green Valley and Corona de Tucson will be impacted from a scenic point of view and probably from a property value point of view. The tailings dump at Freeport-McMoran's Sierrita Mine covers about 7 square miles, and I would expect the Rosemont dump to be about the same. Rosemont will have to acquire more land than they now control, but I think they may be able to do that, though it may take some machinations at high governmental levels and, of course, money.

It's interesting that they are now talking about **filtering** the mine slurry, rather than **dry-stacking**. But it's the same thing, except that they expect now to recover 80% of the water rather than 89% of the water, as stated in their Plan of Operations. This means they will need another 5,000 acre-feet of water per year. The tailings dump still will consist of very dry, very fine dust-like material. The Santa Cruz Valley is very windy, and this material could play havoc at times with the atmosphere here.

Dry stacking is still experimental in this country and in the climatic conditions that prevail here. There is almost as much rain on the western slope of the Santa Ritas as there is on the eastern slope because of the orographic effect of the mountains on storms coming from the West Coast. The potential for major erosion of dry-stacked waste is great, in my opinion.

Due to downward percolating rainwater, this dump will ultimately produce leachate containing undesirable metallic contaminants. Unless the base of the dump is solidly lined with impervious material, the leachate will enter the local groundwater system, causing contamination. The contamination will flow downgradient toward the northwest and eventually impact the Santa Cruz River aquifer at Sahuarita. Eventually, it will end up in Tucson's groundwater.

I reminded an Augusta consultant that dry-stacking to conserve water has never been attempted on a large scale in this country and asked him what would happen if it doesn't work. He said, "Then Rosemont doesn't have a mine". I said that it was a very big risk to depend so much on something so experimental. If it doesn't work, we could be left with a failed mine and all that goes with it.

I expect that the next feasibility study will be about driving a haulage tunnel through the mountain for Rosemont's trucks. After all, they're talking about using Santa Rita Road to haul ore concentrates and probably other things.

Fred Tahse  
April 24, 2008



"Deseret Romero"  
<deseret.romero@pima.gov>

04/29/2008 09:50 AM

To beverson@fs.fed.us

cc "Nicole Fyffe" <Nicole.Fyffe@pima.gov>, "Julia Fonseca"  
<Julia.Fonseca@rfcd.pima.gov>, "Deborah Haro"  
<Deborah.Haro@pima.gov>

bcc

Subject Scoping and Cooperator Status - Rosemont Copper Project  
EIS

Good Morning,

Attached is a letter from Mr. Huckelberry regarding the above subject.

<<be-rosemont.mine.EIS.scoping.cooperator.status.pdf>>

Thank you,

Deseret Romero

County Administrator's Office

130 West Congress, 10th Floor

Tucson, Arizona 85701

Phone: 740-8450



be-rosemont.mine.EIS.scoping.cooperator.status.pdf



## COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER  
130 W. CONGRESS, TUCSON, AZ 85701-1317  
(520) 740-8661 FAX (520) 740-8171

C. H. HUCKELBERRY  
County Administrator

April 29, 2008

Beverley Everson, Forest Geologist  
Coronado National Forest  
300 West Congress Street  
Tucson, Arizona 85701

**Re: Scoping and Cooperator Status for the Rosemont Copper Project EIS**

Dear Ms. Everson:

As you know, Pima County wishes to be actively involved to the fullest extent possible in the National Environmental Policy Act (NEPA) process for the Rosemont Copper Project. We have previously requested, and you have previously agreed to grant Pima County cooperator status (Attachment 1).

While we are pleased to hear of the extension of comment period and addition of meetings, we are concerned by the Forest Service's intention to delay designating cooperators until after you have drafted the summary report of the public scoping period. We understand you believe that public scoping comments will allow you to determine which public agencies need to be invited. We had previously understood that the County would be a cooperator with the Service in this matter.

A successful scoping process needs as many interested stakeholders participating as possible. Getting obvious and identifiable cooperating agencies involved as soon as possible would allow us, and others to have an effective role. An early commitment of resources from other agencies can help the Forest Service succeed.

The cooperator status delay also has acted to preclude meaningful involvement by Pima County in other aspects of NEPA. Because of the delay in designating cooperating agencies, neither Pima County nor any other agency was afforded an opportunity to help the Forest Service define the proposed action and need, select the Environmental Impact Statement (EIS) consultant, or develop the schedule. All of these are currently viewed as collaborative opportunities under NEPA (excerpt in Attachment 2).

Beverley Everson

**Scoping and Cooperator Status for the Rosemont Copper Project EIS**

April 29, 2008

Page 2

As mentioned in our letter of September 14, 2007 (Attachment 3), we continue to believe that initiation of the scoping is premature. Augusta is continuing to conduct exploration and define its project components. This results in considerable uncertainty in the project description and therefore in understanding just where the affected communities might be. Furthermore, the mining plan of operation itself is still incomplete in many important details, such as water and smelting. Also, more time is needed to collect data so that it can be incorporated into the Draft EIS.

Premature scoping increases the likelihood that a supplemental effort at scoping will be needed. This seems particularly true given the project description in the Federal Register notice dated March 13, 2008. Amendments to the project description and supplemental scoping will be both confusing and stressful to citizens, if not to the Forest Service. Another possible consequence could be the need for a supplemental EIS.

We reiterate our concerns that the community is not receiving adequate information about this proposed mining action from the proponents or Forest Service. Question and answer sessions are a respectful way to foster group learning and better issue identification for the scoping. Multiple methods of accessing information are needed. The communities of interest also need better access to more detailed information than is available on Rosemont Copper's website.

In conclusion, we continue to request greater involvement in the planning process. We offer these additional comments as constructive advice, and look forward to establishing an agreement with you concerning planning on public and private lands.

Sincerely,



C.H. Huckelberry  
County Administrator

CHH/dr

c: Nicole Fyffe, Executive Assistant to the County Administrator  
Julia Fonseca, Environmental Planning Manager, Natural Resources, Parks and Recreation

**Attachment 1: Pima County and U.S. Forest Service correspondence regarding  
cooperator status**



## COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER  
130 W. CONGRESS, TUCSON, AZ 85701-1317  
(520) 740-8661 FAX (520) 740-8171

C. H. HUCKELBERRY  
County Administrator

July 18, 2007

Jeanine Derby  
Forest Supervisor  
Coronado National Forest  
300 West Congress  
Tucson, Arizona 85701

Re: **NEPA Process for the Rosemont Mine**

Dear Ms. Derby:

The U.S. Forest Service has received the Augusta Resource Corporation's Plan of Operations (Plan) for the Rosemont Mine. Following federal review of the Plan for completeness, the Forest Service will initiate the National Environmental Policy Act process and will identify an interdisciplinary team (ID Team), which will guide the EIS process. The ID Team usually consists of federal, state, and local agencies, experts, and consultants that have jurisdictional responsibility, geographical proximity, and/or special expertise with impacted resources.

Pima County wishes to participate as a cooperating agency on the ID team. In the NEPA process, cooperating agencies contribute to developing the scope and alternatives, assist with analysis in areas of expertise, provide staff support, and assist in reviewing NEPA documents. ADEQ was a cooperating agency for the Carlota Mine.

While the Forest Service is the major permitting body for the Plan, Pima County will be able to provide constructive input on the environmental impacts during the NEPA process. As a downstream land owner, a local land use regulator, and an air quality permit authority, Pima County has jurisdictional and management responsibility over the proposed project's impacted resources. Pima County also has a broad range of staff expertise in water, air quality, and mining, and has committed to actively commenting on any future Plans submitted for Rosemont Mine. Our participation on the ID Team will maximize the likelihood that the NEPA analysis will address issues in a way that will meet federal objectives.

Sincerely,

A handwritten signature in black ink that reads "C. Huckelberry".

C.H. Huckelberry  
County Administrator

Jeanine Derby  
**NEPA Process for the Rosemont Mine**  
July 18, 2007  
Page 2

CHH/dr

c: Beverly Everson, Forest Geologist, Coronado National Forest  
John Bernal, Deputy County Administrator - Public Works  
Suzanne Shields, Director, Regional Flood Control District  
Carmine DeBonis, Director, Development Services  
Ursula Kramer, Director, Environmental Quality  
Linda Mayro, Manager, Cultural Resources  
Nicole Fyffe, Executive Assistant to the County Administrator  
Julia Fonseca, Environmental Planning Manager, Regional Flood Control District



United States  
Department of  
Agriculture

Forest  
Service

Coronado National Forest  
Supervisor's Office

300 W. Congress  
Tucson, Arizona 85701  
Phone (520) 388-8300  
FAX (520) 388-8305  
TTY (520) 388-8304

File Code: 2810/1950-3  
Date: August 7, 2007

Mr. C. H. Huckelberry  
County Administrator  
Pima County Administrator's Office  
130 W. Congress St.  
Tucson, AZ 85701-8171

Dear Mr. Huckelberry:

**REQUEST FOR COOPERATING AGENCY STATUS: ROSEMONT MINE  
ENVIRONMENTAL REVIEW**

Thank you for your letter of July 18, 2007, requesting that the Forest Service consider Pima County as a potential cooperating agency in the National Environmental Policy Act (NEPA) review of the proposed Rosemont Mine project. The President's Council on Environmental Quality, whose regulations govern Federal agency NEPA compliance, encourages agencies with jurisdiction by law and/or special expertise to assist a lead agency in the NEPA process (40 CFR 1501.6). The expertise you offer will be a valuable asset in this endeavor. Please note that I will be sending a formal letter of invitation to the County and other potential cooperating agencies in the near future as we prepare to initiate the NEPA review of the proposed project.

At present, we are in the process of reviewing a Mine Plan of Operations (Plan) for the Rosemont project. We invite you to review the Plan along with us; it is posted on the internet at <http://www.augustaresource.com/section.asp?pageid=4301>. Our goal is to complete the Plan review by September 14, 2007. Forest Geologist Beverley Everson, Rosemont Mine project manager, is leading this review and is the point-of-contact for comments that you may wish to offer. You may telephone Ms. Everson at (520) 388-8428 or contact her by electronic mail at [beverson@fs.fed.us](mailto:beverson@fs.fed.us) with any questions about the project and the Plan.

Sincerely,

JEANINE A. DERBY  
Forest Supervisor



**Attachment 2: Collaboration in NEPA Handbook.**

COUNCIL ON ENVIRONMENTAL QUALITY

# Collaboration in NEPA

*A Handbook for  
NEPA Practitioners*



OCTOBER 2007

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# V. Opportunities for Collaboration Within The NEPA Process

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This handbook encourages lead agencies to consider, where appropriate, going further than the minimum requirements in engaging the public throughout the NEPA process. Section 102 of NEPA and the CEQ implementing regulations specify minimum requirements for engaging the public in the development of an EIS. The regulations require agencies to engage in forms of public participation such as notice and comment procedures, and public outreach.<sup>12</sup>

Agencies are also required to involve the public to the extent practicable in developing EAs.<sup>13</sup> An agency may choose to apply the public involvement processes available for preparing an EIS to the development of an EA. This is important because agencies prepare far more EAs than EISs.<sup>14</sup>

This chapter provides advice and examples of how to collaborate more fully within and across the different phases of the NEPA process. NEPA practitioners can use the matrix that follows this discussion as a tool to explore approaches to collaboration at different stages in the NEPA process as they develop EAs and EISs. If the lead agency decides to establish a representative group to work toward consensus agreements it should also consider the appropriate legal procedural framework for this, including applicability of FACA (Section VII.D., page 33, and Appendix F, page 89).

## A. Proposed Action/Purpose and Need

Lead agencies can begin using a collaborative approach at the start of the NEPA process when initially conceptualizing the proposed action.

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<sup>12</sup> 40 C.F.R. part 1503, §§ 1500.2(d) and 1506.6.

<sup>13</sup> 40 C.F.R. §§ 1501.4(b) and 1506.6.

<sup>14</sup> See for example the CEQ Reports, "The National Environmental Policy Act, A Study of Its Effectiveness After Twenty-five Years" (January 1997) available at <http://ceq.eh.doe.gov/nepa/nepa25fn.pdf> and "Report on Cooperating Agencies in Implementing the Procedural Requirements of the National Environmental Policy Act" (May 2005) available at [http://ceq.eh.doe.gov/nepa/coop\\_agency\\_status.htm](http://ceq.eh.doe.gov/nepa/coop_agency_status.htm).

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Before identifying alternatives including the proposed action, agencies must first determine the purpose and need for the action. To develop a purpose and need statement, agencies collect information, define the problem, and often brainstorm possible solutions. For example, a land management agency might be concerned about traffic congestion in an environmentally sensitive area of public land. Before it can begin to solve this problem it must collect data on the extent of the traffic problem, its impact on resources, the desires of visitors to the area, and possible solutions to the problem. This information could support a NEPA purpose and need statement.

Agencies can work together during this phase to reach a common understanding of operational, regulatory, and fiscal constraints that might impact the feasibility of potential alternatives. The purpose and need are key in developing alternatives to consider along with the proposed action. When several agencies have a role with respect to one or more alternatives or the proposed action, they can agree to collaboratively develop the NEPA analysis and documentation in a way that will address their collective needs. For example, collaboratively developing the purpose and need with agencies that have regulatory authority for the proposed action can help ensure that the subsequent development and analysis of alternatives results in a NEPA process upon which the permitting agencies can also rely. Similarly, when dealing with project proposals from the private sector, an agency may work collaboratively with private sector applicants, regulatory agencies and other interested parties to ensure that the public interest as well as the applicant's role and needs are taken into account when developing the purpose and need statement.

## B. Notice of Intent

The publication of a "Notice of Intent" in the Federal Register is the first formal step in an EIS process. The lead agency could use the Notice of Intent to emphasize its commitment to collaboration and how it intends to engage interested parties throughout the analysis. Lead agencies can supplement the Federal Register notice with other forms of notice such as announcements on websites, newspapers, newsletters, and other forms of media. Similar methods can be used to provide notice for an EA process.

## C. Scoping

"Scoping" is an early and open process for determining the breadth of issues to be addressed in an EIS and for identifying the significant issues that may need to be addressed when considering a proposed action. By collaborating with others at this point, the lead agency can help ensure that the analysis adequately addresses those issues of importance to affected stakeholders and interested parties. A situation assessment here (if not conducted in an earlier phase) will help determine who should be involved in the scoping process — to what extent, and for what purpose.

Collaboration during scoping can help define appropriate study boundaries, identify possible effects of various actions, and establish a realistic schedule for the analysis.

The lead agency can use scoping in many ways. It can use scoping to clarify the roles of participants, determine gaps in resources, establish dispute resolution procedures,

reach agreement with parties on meeting protocols and ground rules, and clarify project goals, objectives, and time lines. The lead agency can also use scoping to conduct an assessment through individual interviews to identify the key issues and concerns expressed by stakeholders.

***Innovative Scoping:***

*From 2002-2004 the National Park Service conducted extensive scoping meetings throughout the United States, encouraging the public to express their thoughts by writing on maps, speaking to stenographers, or speaking directly to park personnel, to frame the issues for the Colorado River Management Plan EIS (Appendix C, page 60).*

The lead agency can be innovative in how it reaches the public during scoping such as by setting up project websites, distributing periodic newsletters, and holding meetings in diverse locales. In addition, public workshops to generate dialogue and prioritize issues, and continued meetings among cooperating agencies to further identify and prioritize issues, can be useful techniques during scoping.

#### D. Alternatives Development/Preferred Alternative

NEPA requires lead agencies to develop and assess reasonable alternatives that meet the purpose and need for agency action. The development of alternatives can be conceptually challenging and laden with value judgment and assumptions, either unspoken or unrecognized. The selection of alternatives drives the remainder of the NEPA process by framing the issues, the possible solutions, and the analysis.

Lead agencies often find it challenging enough to reach internal agreement on what the range of reasonable alternatives should be. When the process is expanded to include external parties, the challenge can be even greater. Parties must first come to realize that there may be a number of ways by which their objectives (purpose and need) can be met. Collaboratively developed alternatives are more likely to withstand external challenges because such an approach enables stakeholders to have a meaningful role in choosing among alternatives when developing the Draft EIS. Agencies can use a number of methods and approaches to enhance collaboration when developing viable alternatives, such as:

- ❖ Public workshops to discuss draft alternatives and how they can be improved.
- ❖ Working with cooperating agencies to identify and refine alternatives.
- ❖ Working with advisory committees or other existing stakeholder groups to identify and refine alternatives.
- ❖ Working with groups organized by others (e.g., Chambers of Commerce, League of Women Voters) to identify and refine alternatives.
- ❖ Meeting with stakeholder groups or nongovernmental organizations to discuss draft alternatives and how they can be improved.

If agencies desire broader agreement in identifying the preferred alternative, engaging in effective collaboration at the alternative development stage of NEPA is absolutely essential. Selecting a preferred alternative collaboratively can be an effective way of reducing future conflicts and expediting the NEPA process.

**Attachment 3: September 14, 2007 letter from Pima County to U.S. Forest Service regarding Rosemont Mine Plan of Operations.**



## COUNTY ADMINISTRATOR'S OFFICE

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C. H. HUCKELBERRY  
County Administrator

September 14, 2007

Jeanine Derby  
Forest Supervisor  
Coronado National Forest  
300 West Congress  
Tucson, Arizona 85701

**Re: Rosemont Mine Plan of Operations July 11, 2007 - Review for Completeness**

Dear Ms. Derby:

Augusta Resources Corporation (Augusta) submitted a revised Mine Plan of Operations (MPO) for the proposed Rosemont Mine to the Forest Service on July 11, 2007. As the Forest Service was tasked with evaluating the completeness of the first MPO submitted on July 31, 2006, it is again tasked with evaluating this revised plan. A complete plan would provide sufficient detail to evaluate the proposal and alternatives to the proposal, as well as to describe how the proposal will meet environmental requirements of the Forest Service. Such details are necessary for the development of an Environmental Impact Statement, which will be required as part of the National Environmental Policy Act (NEPA) process.

In the letter accompanying the MPO, Mr. Sturgess states that this MPO provides sufficient detail for agencies and the interested public to evaluate the proposal and therefore it is time to begin the NEPA process. After review by several County departments with expertise in the areas of hydrology, air quality, transportation, archeology, and ecology, we disagree. Specific comments from the departments are attached. Staff cite several key areas where the MPO is lacking sufficient detail. The memorandum from the Regional Flood Control District alone, sites 32 specific reasons why the MPO ought to be found incomplete.

Several technical documents are cited in the MPO, but were not made available for the County's review until this week, and some have still not been made available. These are listed in the attached memorandums from the County's Regional Flood Control District and

Jeanine Derby

**Rosemont Mine Plan of Operations July 11, 2007 - Review for Completeness**

September 14, 2007

Page 2

Department of Environmental Quality. If the public and affected agencies are to be given the opportunity to evaluate and comment on this proposed mine, it is essential that Augusta and the Forest Service find a way to make such information available and timely. Our recommendation is that such information be placed on the Forest Service web site.

Although Augusta's efforts to acquire a water source for mine operations from another basin, and replenish that water source with CAP water, may reduce impacts to Cienega Creek from a water supply perspective, these efforts do not eliminate the impacts of the proposed mine pit, impoundments, and other drainage alterations upon Cienega Creek, its tributaries, and the Cienega watershed. Both the mile-wide pit itself and the proposed dam will reduce flows to Cienega Creek and its tributaries, which will with no doubt have direct impacts to both the sensitive riparian habitat in Cienega Creek and its tributaries, and water supply to Tucson residents. Furthermore, there are no assurances that CAP water will be available for the term of mine operations. If there comes a time when CAP water is not available, the proposed mine will further reduce water levels in an area already extremely over drafted.

We continue to believe that locating a mine of this size so close to an urban county of 1 million people is entirely inappropriate. At a minimum, common sense should dictate that the health and safety issues associated with such a proposal should negate approval. On the Cienega Corridor side of the proposed project, a key source of drinking water for the Tucson Basin should not be threatened by a pit and a dam that will surely reduce the amount of water available, and place a real risk to water quality if the dam should break releasing contaminated water. On the Green Valley side, residents should not have to drink CAP water of a lower quality than that of natural groundwater, in order to accommodate a mine. Moreover, residents and visitors to Tucson should not have to share roads with trucks carrying dangerous chemicals to and from the mine. Neither should residents or tourists have to face the impacts associated with huge haul trucks coming and leaving the mine along Scenic Route 83 every 15 minutes, 24 hours a day, for 20 years. These comments do not even begin to address the negative impacts the proposed mine would have on the economy of Tucson, primarily to tourism and recreation, due impacts on important plant and wildlife habitats and scenic viewsheds.

In summary, we have found this revised plan to be incomplete in several areas, and ask that the Forest Service request additional details in the areas specified so that agencies and the public can adequately review the proposed mine during the NEPA process. As a cooperating agency, we look forward to providing the Forest Service with additional expertise during this process. Julia Fonseca, Environmental Planning Manger for the Flood Control District, will be the County's Cooperative Agency representative. As you saw in the report forwarded to you regarding the hydrological impacts associated with the proposed pit on the flow of groundwater recharge, the County is more than willing to

Jeanine Derby  
**Rosemont Mine Plan of Operations July 11, 2007 - Review for Completeness**  
September 14, 2007  
Page 3

commit time and resources to analyzing this proposed mine. However, these are the types of studies that the Forest Service should be requesting of the applicant.

Thank you again for this opportunity to comment, and for the opportunity to join you as a cooperating agency in review of this proposal.

Sincerely,



C.H. Huckelberry  
County Administrator

CHH/dr

Attachment

- c:     **The Honorable Chairman and Members, Pima County Board of Supervisors**  
       **Beverly Everson, Forest Service Geologist**  
       **James Sturgess, Augusta Resource Corporation**  
       **Suzanne Shields, Director, Flood Control District**  
       **Julia Fonseca, Environmental Planning Manager, Flood Control District**  
       **Nicole Fyffe, Executive Assistant to the County Administrator**



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# MEMORANDUM

## Water Resources

### Regional Flood Control District

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**DATE:** August 27, 2007

**TO:** Nicole Fyffe, Executive Assistant  
County Administrator's Office

**FROM:** Julia Fonseca  
Environmental Planning Manager

**SUBJECT:** Rosemont Mine

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The U. S. Forest Service must determine whether Augusta's mining plan of operations (MPO) should be considered complete or incomplete. A complete MPO would provide all of the information about the project proposal necessary to go forward and describe environmental impacts and analyze alternatives for the Environmental Impact Statement required by the National Environmental Policy Act. A complete plan would also fully describe all measures to be taken to meet the Forest Service requirements for environmental protection, including mitigation. This plan, as reviewed by District staff, does not meet these completeness tests.

The mining plan of operations should also be considered incomplete due to lack of timely access to critical documents referred to in the initial mine plan of operations dated July 11, 2007, incomplete description of the proposed facilities in the MPO, and failure to conform with Forest Service policies regarding information needed to analyze water supplies potentially derived or affecting Forest land. An incomplete determination based on the initial July 11, 2007 filing will give Rosemont additional time to file additional documents.

#### **District's Review of the Proposed Rosemont Mine Plan of Operations Hampered**

Regional Flood Control District (District) staff has reviewed the Rosemont Project Mine Plan of Operations (MPO) prepared for Augusta Resource Corporation by Westland Resources, Inc. dated July 11, 2007. Additional materials received in August (July 25, 2007 Electrical Power Supply and Water Supply Supplement) by the County Administrator's Office were also reviewed.

The District's review of the Plan of Operations was hampered by lack of document availability. Certain documents cited seem likely to be germane to the completeness review. Information cited in the MPO but not available on the company's website nor as hard copies as of August 17, 2007 include:

- Tetra Tech (2007a) Geochemical testing program.
- Tetra Tech (2007e) Groundwater Protection Plan
- Tetra Tech (2007g) Site water management plan
- Tetra Tech (2007h) Viewshed Analysis
- Westland (2007) Biological Resources and Mitigation Concept: Rosemont Project

If the Forest Service will rely upon Augusta to provide the documents for public review on Augusta's website, then it is important that the documents be posted timely. Over one month has elapsed since posting of the Executive Summary and the posting of these supporting documents on the website.

**Plan of Operations Incomplete**

The mining plan of operations is incomplete and thus does not provide sufficient basis to understand impacts and evaluate alternatives for the EIS.

1. The MPO does not disclose sufficient information about how the proposed mine will intercept and alter surface flows and the down stream riparian habitat.
2. The plan does not provide sufficient information about dewatering of the large deep pit to evaluate impacts upon the subsurface groundwater flow regime.
3. The MPO does not disclose where production wells would be sited within the Cienega basin or where or how much would be produced.
4. The MPO does not disclose how existing wells and surface water rights would be deployed.
5. The plan does not provide any information about proposed CAP pipeline and replenishment scenarios for mine supply water in the Upper Santa Cruz River Basin, though these are being debated in the public media. The location and ownership of proposed recharge basins is completely unclear, so it is impossible to understand groundwater impacts that will result from the activity. Augusta's statements in the media about their lack of financial interest in these project components are not sufficient basis for the Forest Service to consider the pipeline and recharge basins as being outside the scope of the mining plan of operations' required disclosures. Such facilities may in fact be necessary mitigation components for the proposed wellfield near Sahuarita.
6. The location of Augusta's parcel 303-60-1410 is shown, but exact range of activities on that site is not specified other than a wellfield. Are any other mine-related activities to be conducted on that site?
7. MPO does not state whether production wells will or will not be operated to recover stored CAP.
8. The circumstances under which the long-term storage credits will be extinguished are not stated. If the credits are not extinguished, they may be sold and used to justify additional pumping elsewhere in the Tucson AMA. If they are extinguished, they may be recovered as CAP at the mine's production wells. State statutes also provide an option for designation of storage credits, as non-recoverable contributions to the aquifer. Impacts cannot be analyzed without understanding the circumstances under which any of the credits will be extinguished.
9. The MPO does not disclose the disposition of the grazing leases during the term of operation.
10. The MPO does not disclose the range of variability for the term (duration) of the operational components (e.g. the stormwater dam, the millsites, etc), nor for closure activities. Postponing the date of commencement and completion can have profound environmental impacts. Most copper mines have had a significantly longer term than the 15 to 19 years that Augusta has variously stated.
11. The plan does not describe location of acceleration/deceleration lanes on SR 83, or timing of construction.
12. Plan does not describe changes needed at rail yard in Vail, Arizona required for this project.
13. The reclamation plan appears incomplete. For instance, will the poles and transmission lines be dismantled and removed following the closure of the mine? (pg. 39-40) Will the power line route be re-vegetated?
14. Whether all reclamation cap materials are derived on site is unclear. Will offsite areas be denuded for additional topsoil? Will sludge or other organic waste be imported?
15. Location of the additional, offsite processing steps is not disclosed, e.g. smelting.

16. Rates and locations of concurrent reclamation are not fully disclosed.
17. The disposition of other ore bodies is not disclosed. Would this MPO rule out the development of the other ore bodies or is the intent to expand?
18. Disposition of existing adits, shafts etc. is not stated. Are these features rehabilitated before or after commencement of the mining place, destroyed, left in place?
19. How will the limestone be used or treated for acid neutralization and will any be used for cement?
20. Pit lake characteristics or treatment is not addressed.
21. Water management of springs buried under the tailings is not addressed.
22. Circumstances under which capacity of the compliance point impoundment would be increased are not disclosed.
23. Direction of travel for outgoing concentrate, incoming sulfuric acid, etc. is not specified.
24. Will the project include upgrades to the port of Tucson facilities, or any other sites not currently described in the Plan but owned by the project proponents?
25. Local sources of pebble lime are not described. Is the source within the project boundary, or outside it?
26. It is unclear if the only fence is the 4-strand barbed wire fence mentioned in the access plan for the "active mine site".
27. Exact location of Potentially Acid Generating material is not specified, nor mitigation identified to sufficient detail for an EIS, or for the mine waste management plan. Isolation is mentioned, but no description is provided.
28. Hydrogeologic and geochemical modeling data for pit are not available, but are planned. These may alter how the pit is managed.
29. Groundwater protection plan design is not completed due to ongoing geochemical modeling.
30. Pollutant management area is not yet defined because models are incomplete and facilities are not fully planned.
31. Physical dust controls are not specified; instead there is a list of potential measures.
32. What is the mitigation to CLS lands (pg 90)?

#### **MPO fails to conform to Forest Service Groundwater Policy**

The following information will be required to determine if a proposal to use water is consistent with Forest Service policy and plans, could impact National Forest resources, or could adversely affect adjacent water supplies.

**Water Needs.** The quantity of water the proponent is currently seeking from NFS lands and the purpose of use of such water must be identified. If the proponent anticipates increased water needs in the future, such needs should also be quantified.

**Infrastructure.** All anticipated facilities such as roads, power lines, pipelines, water storage tanks, and pumps that could ultimately be needed to produce and convey water from the site must be identified.

**Potential To Affect Forest Resources From Drilling Activities.** Drilling activities themselves can negatively impact Forest Resources. In instances where considerable disturbance may result from the drilling process itself, the proponent must demonstrate that there is a reasonable likelihood of successfully completing any water wells. Applicants should provide the rationale used to locate any proposed well(s).

This should include both hydrologic and geologic information. An inventory of all existing wells in the vicinity along with any available information such as driller's logs, well depths, well yields, water quality information, geophysical logs and well construction details should be provided. In addition, information regarding favorable geologic conditions such as known water bearing formations (including location, aerial extent, lithology and hydrologic characteristics) or favorable structural features should be identified.

**Potential To Affect Forest Resources From Pumping Ground Water.** To determine potential impacts to Forest resources in the vicinity, an inventory of key resources should be compiled. Information that may be required includes:

- The location of potentially affected surface water resources including all streams, springs, and seeps.
- The location and description of riparian vegetation. Any known Threatened and Endangered species.
- Pertinent geologic information. This should include a map of the area identifying surface geology and any known subsurface formations and structural features. Hydrologic characteristics of the target aquifers such as transmissivity and storability should also be included, if known.
- Pertinent hydrologic information. Any available information regarding water table or piezometric surface elevations including known seasonal fluctuations, direction and rate of ground water flow, recharge and discharge areas, surface water flow characteristics including volumes and peaks throughout the year, location of gaining and losing reaches of streams, and water quality should be provided.
- Potential to Affect Existing Water Supplies. In order to determine potential impacts to adjacent water supplies both on and off-Forest, wells, springs and other sources of water supply in the vicinity should be identified. Well yields, spring discharges and quantities of water used should be provided.

### **MPO Impacts Analysis**

Below are additional comments regarding impacts analysis which will be required under the National Environmental Policy Act. We request that the Forest Service consider these comments in the scoping for the EIS.

#### **Visual impacts**

1. The mining project will affect State Route 83, a designated scenic highway. How will the proposed SR 83 widening effect the scenic route? How will invasive species be addressed during and after roadway construction? How will the widening project impacts be mitigated? How visible will the mining project be from SR 83, including the mitigation berm? Will this project affect the scenic highway designation?
2. The mine facility is exempt from the Pima County lighting code, however, nearby observatories are dependent on dark skies. The rural setting of the Rosemont area is characterized by dark skies, unpolluted with artificial lighting sources. Every attempt should be made to comply with the Pima County lighting code.
3. The definition of "reclaimed" needs to be defined. By the end of the project, the "reclamation" berm will be the primary visual impact of the mine. This reclamation berm is also the viewshed protection facility. What the Plan of Operations is calling the ultimate reclamation surface (perimeter berm and tailings pile) makes no attempt at mimicking natural topography. A screening berm shielding the mine and mining facilities does not constitute reclamation. The Plan of Operations should include an alternative that includes a valid a reclamation plan in terms of re-contouring, re-shaping and re-vegetating land to its approximate original appearance.

4. Current plans do not call for dismantling the dam or filling in the pit at closure. An alternatives analysis should consider these options.
5. Invasive species control should be expanded to any newly constructed roadway, power and water line corridors, and other cleared and graded sites created for mining operations. Control measures for noxious species should be expanded to include invasive species not considered "noxious."
6. Viewshed analysis visuals are not clear (Figures 3-2 through 3-5).

### Hydrologic Impacts

This proposed large mining project will affect both ground and surface water. The overall plan does not go into enough detail to indicate how impacts of the proposed mine will affect interception of surface flows and the down stream riparian habitat. In addition, the plan does not outline what the effects of digging a large deep pit will have on the subsurface groundwater flow regime. A 3D flow model is needed to evaluate the effect of the mine activities will have on the subsurface flow and downgradient subsurface flow. Finally, the plan does not go into enough detail regarding the different replenishment scenarios for mine supply water in the Upper Santa Cruz River Basin.

The best way to consider the effects of a large project such as the Rosemont Mine on the hydrology of the area, both groundwater and surface water, is to consider the existing water balance of the area and the magnitude of changes that may be caused by the proposed mine. The changes include drawdown away from the mine, discharge to the washes and springs, and groundwater flow to downstream aquifers. These changes will now have to be evaluated with surface and groundwater models that evaluate pre- and post-mining effects. Specific comments follow:

P.42, Para 2: First, the Cienega Basin has never been known to yield large amounts of water for mine production in the quantities proposed at Rosemont. Granted, there is a more sensitive ecosystem in place with perennial flow in Cienega Creek. However, large groundwater reserves have not been proven or established in the Cienega Basin. Most wells are low volume suitable for stock tanks and small municipal development. Augusta has stated that they are seeking water from west of the site because of sensitivity to the Cienega Basin. Maybe large quantities of water were just not available. Therefore, the next logical place to look for mine supply water is the abundant upper Santa Cruz Basin that can produce 5000-7000AF/yr needed to process ore. Second, unless CAP is used directly by Rosemont, the impacts of the mine will be experienced in the Green Valley/Sahuarita area. Community Water Company (CWC) has indicated in a 7/25/07 public meeting that Augusta is willing to help fund a 20" pipeline to move CAP from the current terminus south to an area near Duval Mine Road and the Santa Cruz River either to recharge in basins or the Santa Cruz River. Compared to the native groundwater in the area, CAP is typically twice the TDS content. Recharge to the Santa Cruz River or basins will cause an increase in mineralized content of the native groundwater. Direct use of CAP by Rosemont would insure that no impact to the Green Valley/ Sahuarita area is made. Currently ASARCO mine has agreed to use up to 10,000AF of CAP at their Pima Mine Road Facility, thereby reducing drawdown of the water table in the area and actually allowing for a net water balance recovery in the area.

P.43, Para 3: As written the CAP recharge will and is occurring over 25 miles downgradient of the area of hydrologic impact. The proposed recovery wells in east Sahuarita are in an area where groundwater declines are 1-2 feet per year. Extraction of an additional 5000 AF/yr will result in additional decline in the area where replenishment is needed for an already extremely over drafted area, predominantly (86%) by the mines and FICO.

P. 45, Recharge Plan: A total of 88% (4400 AF) was recharge in an area over 25 miles downgradient of the area of hydrologic impact. In addition, Augusta for Rosemont has not considered direct use of CAP. If Rosemont is committed to lessening impacts of the mine in the Upper Santa Cruz Basin, then direct use of CAP is the only alternative. Finally, what if CAP is not available for recharge or direct use in the future? Then the burden of mine supply production will be bourn by declines in the basin and other water users.

P.46, 2.9 Surface Water Management: Figure 2-11 shows the Site Water Management Conditions, Year 0. The table inset shows the 2-year, 24-hour runoff estimate at 406 AF and 530 cfs at the compliance point dam. Figure 2-12 shows the Site Water Management Year 10 Conditions. The 2-year, 24-hour runoff estimate at the compliance dam diminishes to 147 AF and 139 cfs, 36% and 26% respectively of the volumes in year 0. Thus, 269 AF in this type of storm would never reach the down stream portion of the Cienega Basin watershed due to interception from closed systems such as the open pit, heap leach facility and the plant site. Smaller and larger storms will also result in diminished flows to the Cienega Basin. The significantly diminished flows may result in die back of shallow sub flow or soil moisture dependent meso-riparian vegetation along the narrow thin alluvial tributaries to Cienega Creek. How much storm flow, that would otherwise flow unimpeded to the Cienega watershed, on an annual basis, is estimated to be intercepted by the mine activities and structures? This modeling exercise needs to be presented to show the annual reduction in storm flows and the subsequent loss of surface water to the Cienega watershed. Ultimately, what impact will these reduced flows have on the perennial status of Cienega Creek.?

P. 67, Groundwater Protection Plan: This section is very brief and incomplete. I tried to obtain the Tetra Tech (2007e) Groundwater Protection Plan to review more details. It was not available on Augusta's web site. Questions that need to be answered include: How will mineralized process water be contained and disposed of without contaminating surface and groundwater? Eventually process water will become too mineralized to recycle. Will it be evaporated? If so, how will the solid residues be disposed of to not contaminate surface and groundwater?

JF/yo

Cc: Suzanne Shields, Director and Chief Engineer  
Chris Cawein, Deputy Director  
Tamara Jorde, Special Staff Assistant, Director's Office  
Thomas Helfrich, Water Resources Division Manager  
Frank Postillion, Chief Hydrologist  
Neva Connolly, Senior Planner



# MEMORANDUM

**DATE:** August 29, 2007

**TO:** Nicole Fyffe  
Executive Assistant to the Co. Administrator

**FROM:** Chase Waddell *CW*  
Environmental Analyst, PDEQ

**THRU:** Ursula Kramer *UK*  
Director, PDEQ

**RE:** PDEQ Comments on Augusta Resource Corporation's Rosemont Project Mine Plan of Operations

A review of Augusta Resource Corporation's proposed Mine Plan of Operations for the Rosemont Project (RP), dated July 11, 2007, was conducted by PDEQ. The review included evaluation of the entire Mine Plan of Operations proper (the plan), and the Electrical Power Supply and Water Supply Supplement submitted July 25, 2007. PDEQ comments follow and have been placed under the same paragraph heading as the original material from the plan. PDEQ regulations address primarily the fugitive dust emissions from the operations, but the comments below are more comprehensive and encompass broader environmental issues. The submitted plan does address many environmental issues in addition to the PDEQ regulatory requirements.

There are references to several studies and supporting documents throughout the plan that were not provided to PDEQ for review along with the plan. Without these documents, a thorough assessment of RP's realistic environmental impacts cannot be completed either by PDEQ or other government reviewers. A list of documents that would have been necessary for a complete review is given at the end of this report.

We are available to answer questions on the comments and for discussion on the submitted documents and would be interested in participating in any further review or discussions on this project.

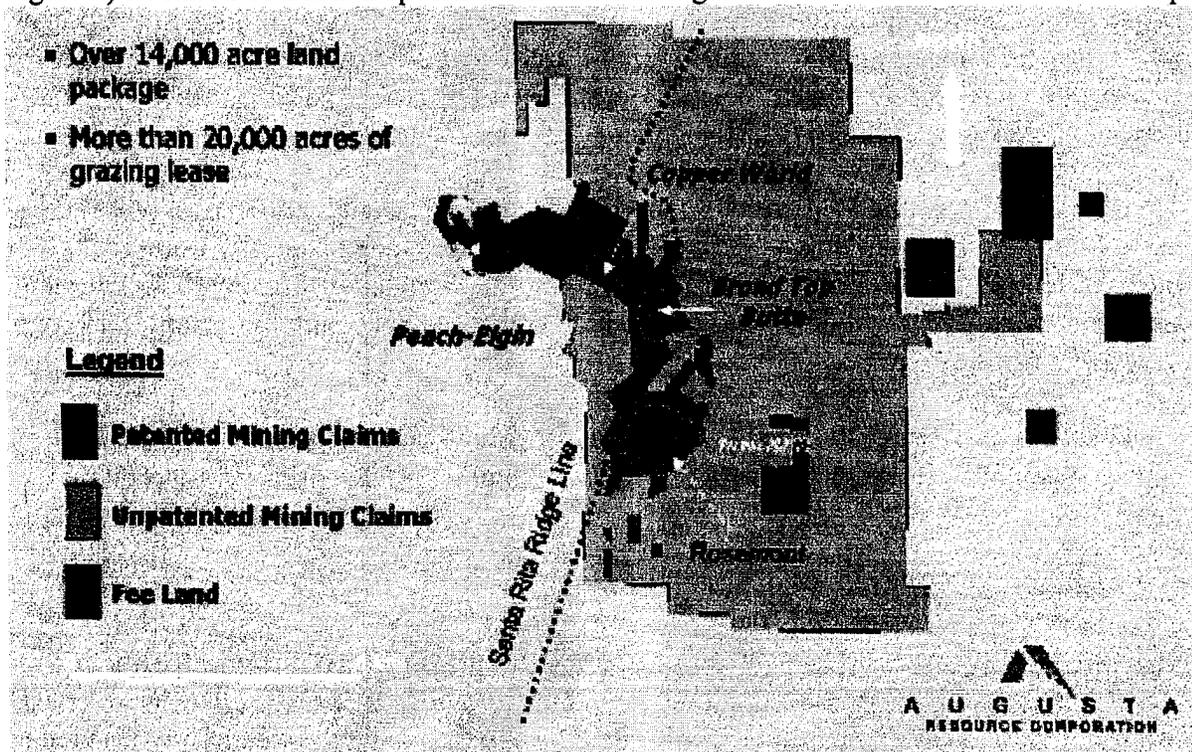
## Specific Comments on RP Mine Plan of Operations

**1.5.2. Significant Employers:** The plan makes reference to the other two mines currently in operation near the proposed RP. It is important to note that the ASARCO Mission Mine has been a source of dust pollution complaints consistently in the past; which have resulted in involvement of the Governor and the United States Environmental Protection Agency.

**2.1.1 Open Pit Plans:** The RP open pit configuration is stated to ultimately be "about 6,500 ft across north to south, 6,000 ft across east to west, and will be about 1,800 to 2,900 ft deep." It is understood exact pit configuration cannot be determined now due to the fluctuation in metal prices and precise information on the distribution of mineral reserves. However, PDEQ would like to see some limitations on pit size included in the document so that a guarantee is given on the allowable extent of the pit.

Review of the 2007 Mineral Resource Update for the Rosemont Project, dated April 26, 2007, revealed the presence of a total of 4 deposits on the Rosemont Property. They included the Rosemont Deposit, which ARC has planned to extract, the Broadtop Butte Deposit to the north of Rosemont, the Copper World Mine to the north and west, and the Peach-Elgin Deposit to the north and west. All three of the other deposits lie partially or completely over the ridgeline of the Santa Rita Mountains (see Figure 1 below.) Development of these potential resources in the future would lead to visual and physical impacts not addressed in the plan. In order to consider this version of the plan complete, PDEQ would need some statement incorporated that these deposits specifically will *NOT* be developed in the future, regardless of economic incentive. Incorporation of such intentions in the closure planning of the mine will be necessary to prevent sale of the other deposits to mining interests in the future. The recent complaint filed by ASARCO contesting ARC's ownership of the mine testifies to other firms' interest in the Santa Rita Range (<http://biz.yahoo.com/iw/070824/0294999.html>).

Figure 1) Location of Other Deposits at RP same as Figure 6-2 in 2007 Mineral Resource Update.



(<http://www.mineweb.net/mineweb/view/mineweb/en/page19565?oid=22349&sn=Detail>)

**2.1.6 Waste Rock:** Acid rock drainage is stated to be minimized by the presence of limestone and skarn in the waste rock piles (due to their buffering capacity.) However, this statement requires significantly more information associated with it to gauge if it is a realistically feasible idea. Necessary considerations include infiltration rate of water through the rock piles, and exact mineral content to evaluate the acid balance of the system. Whereas conceptually acid generation can be controlled by the presence of buffering minerals, the presence of such minerals does not guarantee

acid control (especially when tailings are planned to be added to the waste rock storage piles.) More detailed analysis should be included to consider the plan complete.

**2.1.7 Mine Equipment:** PDEQ would like to commend and encourage the proposed use of an electric trolley-assist system for trucks in the pit. Such an effort would help reduce air pollution and fuel consumption at the mine. The plan states that ARC will investigate the possibility of using such a system, but does not guarantee the facility will use it. A decision on the system should be made to consider the plan complete. Power consumption at the facility by such a system will significantly impact other aspects of the plan, including the power transmission requirements. However, ARC should be encouraged to pursue implementation of such a system.

In the listing of proposed mining equipment, three water trucks are proposed. This number of trucks may or may not be adequate for use in dust control at the facility. Supporting arguments for the choice and adequacy of the choice will need to be included in the plan to consider the plan complete.

PDEQ would also like to commend the proposed use of water from the pit dewatering system to control dust as a water conservation technique.

**2.1.8 Mine Staffing:** In order for the plan to be considered complete, PDEQ would require a more detailed explanation of the structure of the environmental staff to be utilized and the authorities of such staff members in the mining operations. As the plan stands now, there is only the mention that out of "about 45 people" that will comprise mine supervision and technical/support personnel, some will be dedicated to environmental and safety issues. This is not enough information for any reviewer to gauge the ability of ARC to manage their environmental responsibilities.

**2.2.1 Process Overview:** Description of mineral processing is consistent with general copper mining practices, but no specific information concerning the type of equipment has been included. This may not be necessary from an initial impact review, but it will be necessary to gauge whether or not the pollution control devices selected are properly sized and capable of handling the load that ARC plans to use them for. More detailed information on control equipment (such as the capacities of the wet scrubbers and their design) and the proposed size of the other equipment will be necessary to do a complete analysis of the plan.

**2.2.2 Sulfide Ore Processing:** Several steps of the ore processing involve the generation of an effluent stream. ARC has proposed to recycle process water during sulfide ore processing, but no specifics about the system are available. Greater detail about the system should be made available in order to gauge the feasibility of recirculation, and address issues where discharge from the system will potentially be necessary (such as salt accumulation in the recycled waste water due to evaporative losses.)

**2.2.2.3 Grinding:** A complete schematic of the actual layout of grinding equipment and conveyor belts will be necessary to identify potential sources of air pollution and evaluate the adequacy of

proposed air pollution controls for dust emissions. PDEQ does not think the plan is complete without a more specific analysis.

**2.2.3 Oxide Processing:** The design of the heap leach system must be included with the plan submission for analysis of possible environmental impacts. A report is referenced (Tetra Tech (2007f)) in the plan that contains the design parameters. This report should be supplied along with the plan. Likewise, design and controls for all ponds associated with the heap leach system must be included with the plan to evaluate the efficacy of the design and identify potential shortfalls.

The methods employed with leaching must be expanded upon to complete the plan. For instance, will environmentally friendly microbial leaching be used? Has this alternative, and its associated economic and environmental benefits, even been considered in the design of heap leach system?

And, like the sulfide ore processing, the plan claims to recycle all process water from the leaching/SX/EW system and prevent discharge. Consideration for discharge due to salt accumulation and other eventualities must be included to consider the plan complete.

**2.2.4.1 Fresh Water:** The design of the water delivery pipeline, recharge and pumping facility is provided in more detail in the Electrical Power Supply and Water Supply Supplement. However, what are still missing from both of these documents are the design considerations for the type and number of pumping engines/motors. In order to prevent a significant source of air pollution in the region, ARC should use a system of only electric motors to power the pumping field and all booster stations. If combustion engines are planned for use as backups or any to be used as primary power (strongly recommended against), then the plan is not complete without such information and the limitations of operation of such engines planned by ARC.

**2.3.1 Waste Rock and Mill Tailings Management:** Assessment of the potential to generate acid rock drainage at the proposed mine and ARC's management strategy is referenced as detailed in a report not included with the plan (Tetra Tech 2007a.) Whereas the plan generally sounds progressive and environmentally responsible, none of the aspects of the plan can be adequately reviewed and evaluated without the details of initial analysis.

**2.3.2.4 Collection and Treatment of Waste Rock Drainage:** Plans for control of drainage from the waste rock storage area is progressive. However, further details of any analysis performed with regard to the issue will need to be provided to assess the adequacy of the planned controls. Issues that must be addressed include the design of the sediment pond—is it lined, what load of sediment has it been sized for, will it remain useable for the life of the mine, has it been sized properly for intense rain events, etc.? The report referenced in the plan that deals with some of these issues should be included with the plan for full review (Tetra Tech 2007g.).

**2.3.3 Tailings Dry-Stack Facility Design:** The plans for dry-stack tailings operations seem enticing and include some very progressive elements for control of both air and water pollution. However, verification of certain assumptions and statements can only be accomplished through review of the more thorough analyses that lead to any such conclusions. The report referenced with respect to these operations should be included with submission of the plan for complete review (Vector 2006).

**2.7 Electrical Power Supply:** Will ARC be funding, partially or wholly, an expansion of the electrical services necessary to support the mine functions? The facility will draw a significant amount of power. Upgrades to infrastructure to accommodate such an increase should be offset with funds from the mine.

**2.10 Transportation:** ARC plans to carry out all transportation to and from the mine using heavy trucks. From Table 6, Trip Data, of the plan one can see that the proposed rate of truck traffic is estimated at 582 heavy truck trips into and out of the facility every week. Transportation of the copper concentrate (main product) alone will necessitate 56 trips per day 365 days a year. If the schedule is assumed constant, as the mine is planned for 24 hour operations, the mine will generate 1 heavy loaded truck on SR-83 every fifteen minutes for the next 20 years simply to move their salable product.

Traffic from the mine will travel along SR-83, SR-82, I-10, I-19 and other thoroughfares in the region. The impact of such traffic will undoubtedly be felt in terms of congestions, increased wear and damage to roadways and supporting structures (with the increased associated costs of repair,) and air pollution from the predominantly diesel fleet. Not to mention, increased air pollution from increased traffic on the surrounding railways.

In order for this plan to be considered complete, ARC would need to provide analysis of the impact of this frantic shipping traffic and provide an analysis of how the impacts will be abated, both financially and environmentally.

**2.10.2 Sulfuric Acid:** The transportation of tanker trucks filled with concentrated sulfuric acid poses its own transportation security concerns. The plan includes estimations of  $H_2SO_4$  consumption at 73,190 tons of acid per year. This will be satisfied by delivery of 9 trucks full of acid per day to the mine. Those 9 trucks per day will have to travel, with their extremely hazardous cargo, along the main thoroughfares of the region and through the population centers, as well. The plan should not be considered complete until some kind of safety and response plan is outlined for the increased risk of hazardous waste spills along the regular shipping routes.

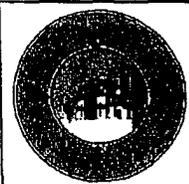
This particular concern for acid consumption provides one of the strongest arguments for the use of microbial leaching techniques that reduce the need for exogenous acid use. ARC should supply a cost benefit analysis of employing environmentally friendly microbial leaching at the facility in order for the plan to be considered complete.

Memo to N. Fyffe  
RE: Rosemont Project Mine Plan of Operations  
August 29, 2007  
Page Six

**3.2.2 Dust Control Measures:** The dust control measures outlined in the plan are adequate if properly sized and placed, and if the emission sources are adequately attended to. A detailed schematic of the proposed facility would provide reviewers with an opportunity to gauge the adequacy of chosen dust control measures. The plan should not be considered complete without such a schematic and more detailed information. Early planning and proactive efforts in the design phase will be highly beneficial with respect to dust control. It will also be desirable to pay particular attention to this issue, as dust will be the primary air pollutant of concern from the facility. More than anything else, dust control will require an extensive and rigorous operations and maintenance plan to assure adequacy—such a plan should be included in more detail for full review.

## **Reports Necessary for Complete Review**

- 1) Tetra Tech 2007a. "Baseline Geochemical Characterization."
- 2) Tetra Tech 2007b. "Dry Tailings Facility Design Report."
- 3) Tetra Tech 2007e. "Groundwater Protection Plan."
- 4) Tetra Tech 2007f. "Leaching Facility Design Report."
- 5) Tetra Tech 2007g. "Site Water Management Plan."
- 6) Tetra Tech 2007h. Viewshed Analysis. Technical Memorandum prepared for Augusta Resource Corporation, dated June 29, 2007.
- 7) Tetra Tech 2007i. "Waste Management Plan."
- 8) Vector Arizona. 2006. "Rosemont Tailings Siting Study." Technical Report, May 26, 2006.



**MEMORANDUM**  
**PUBLIC WORKS - DEVELOPMENT SERVICES**  
PLANNING DIVISION ENVIRONMENTAL PLANNING



**DATE:** August 22, 2007

**TO:** Nicole Fyffe, Executive Assistant to the County Administrator

**FROM:** Sherry Ruther, Environmental Planning Manager

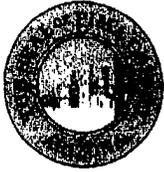
**SUBJECT:** July 11, 2007 Rosemont Mining Plan of Operation (MPO) –  
Completeness Review

As requested, review of the above-referenced MPO largely focused on assessing its completeness in providing information sufficient necessary to initiate the Environmental Impact Statement (EIS) and more specifically is there adequate disclosure of potential effects to Pima County residents. My review suggests there is insufficient presentation/discussion regarding potential impacts to local communities and services. What discussion is provided in the MPO regarding impacts to the social environment does not establish a foundation from which corresponding sections in the EIS can be informed.

Discussions of population demographics need to be expanded to include potential influences the project is likely to have on development patterns and use of private property within the project's sphere of influence as well as potential impacts to the area's access to community services. Pertinent points would include:

- Where are mine employees likely to reside?
- What's the potential for the trend of unregulated development to change?
- Is the project likely to deter development on private properties in certain areas within the sphere of influence?
- Is the project likely to induce changes in land uses within the sphere of influence that are not currently envisioned?
- What are the potential impacts to the sustainability of County services and expenditure of County resources, especially if the trend for unregulated development is exacerbated?

cc: Carmine DeBonis, Development Services - Director  
Arlan Colton, Planning Director  
Chris Poirier, Administrative Project Manager  
Manabendra Changkakoti, Comprehensive Plan Administrator



# MEMORANDUM



Department of Transportation  
*Traffic Engineering Division*

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**DATE:** 08/23/07  
**TO:** Priscilla Cornelio  
**FROM:** Mo Farhat  
**SUBJECT:** Rosemont Plan of Operations – Review of Traffic and Transportation Issues.

---

Enclosed is the review of the Rosemont Plan of Operations by TED. The review was done based on the minimal related traffic/transportation documents and data provided by Augusta Resource Corporation, consultant/owner, for this large mining project.

It is noticeable that no analysis was presented evaluating any anticipated impact, from a traffic stand, on roadways in the area. Except for a proposed 8"x11" design of an access road for the mine, nothing was mentioned about any other local roads, trails, and private accesses that could be impacted directly or indirectly.

Please let me know if you have any questions related to the attached review comments.

Thank you.

Enclosures

cc: Ben Goff  
Albert Letzkus

**Rosemont Mine Plan of Operations**  
Augusta Resource Corporation

**Review Comments**  
Pima County Department of Transportation  
Traffic Engineering Division  
Mo Farhat August 23, 2007

1. The documents reviewed had minimum discussion and/or evaluation to traffic and transportation issues impacted by this project. The documents contain a proposed design for an access road but nothing was said about other existing accesses in the area (if any).
2. A report that solely addresses traffic and transportation issues is needed to clarify anticipated impact of the new project on the local roads especially Pima County Roads for the nearby communities.

In addition to new needed road and/or access, the report should evaluate the conditions of existing roadways and any other accesses and evaluate any impact that would be caused by future changes in traffic pattern and new transportation conditions.

3. The report should discuss type of vehicle used, weight, and loading capacity for those vehicles traveling on jurisdictional roads such as Pima County roads. The discussion should present tables of anticipated trips to and from the proposed facility such as truck trips and car trips including a regional map for trip distribution (what percentage goes in what direction).
4. A list of all Pima County roadways, trails, accesses, bridges shall be provided disclosing possible usage, impact, and any planned improvement. Pima County advance approval is required prior to any planned usage of the above listed accesses.
5. A design speed for the access road, that is planned to connect SR 83 to the facility, needs to be evaluated and decided based on roadway related factors and characteristics concerning safety of the public using the road. The design geometry of the new road will be based, among other factors, on the selected design speed.

6. Provide a standard blue print plans (1"=40' scale) for any new needed road, including the access road, or an exiting road that needs some improvements. The plans shall include all pertinent sheets such as civil plan, pavement plan, drainage plan, striping and signing plan, etc.
7. The plans, at least those pertain to Pima County roads, should include project description and other pertinent general notes
8. The 4 feet shoulder area suggested for the new access road by the proposed design does not meet County standard which is 8 feet shoulder 4 feet of which are paved. Based on the selected design speed and the anticipated volume, a required clear zone (including shoulder area) can be found in the Roadside Design Manual.

A certain lateral distance is required for traffic devices in the shoulder area. A 4 feet shoulder will not accommodate the needed lateral distance.

9. The Pima County signing and striping standards shall be applied for new to be constructed roads or for existing to be improved roads and/or accesses.
10. The signing and striping plans should show adequate striping pattern needed and all pertinent regulatory, warning, delineators, hazard markers, etc.
11. The headwalls of any box culverts shall be outside the clear zone. Delineation and/or hazard Markers shall present be installed at these box culverts and at other locations as deemed needed.
12. Proposed construction of box culverts and the modification by means of redirecting the path of washes in the area may need to be reviewed by Pima County Flood Control District.
13. Locations where natural steep slopes exist and is not traversable or extension of box culvert is geometrically unattainable, barriers such as guardrails may have to be installed to protect employees, visitors, etc.

14. The use and/or the improvement of existing County roads (be it dirt road, bridge, trail, etc.) for commercial hauling and heavy loads equipments would require County review and permission in advance of the usage of such roads.

## Nicole Fyffe

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**From:** Linda Mayro  
**Sent:** Wednesday, September 05, 2007 1:39 PM  
**To:** Nicole Fyffe  
**Subject:** Rosemont comments

**Importance:** High

Nicole -- In reading the plan of operations, there is little for me to comment on specifically since the technical and engineering issues are really the focus. That said, I do have the following general recommendations that should be considered as part of the NEPA and NHPA compliance process:

### Cultural Resources Plan:

1. The entirety of the Rosemont project area, including off-site roads, powerlines, and water lines, etc needs to be completely resurveyed to identify all cultural resources (prehistoric sites, historic sites, buildings, homesteads, objects, structures, and traditional cultural places) that may be affected by the proposed mining.
2. Because the mine will have a large areal impact, assessment of site significance and site impacts needs to be addressed at the landscape level.
3. An ethnographic study should be conducted well in advance so that effects to the living cultural traditions and practices of the Tohono O'odham and other groups can be assessed, understood, and whether there are any measures to mitigate these impacts.
4. The cumulative of impacts to cultural resources, the cultural landscape, and living people must be fully considered.
5. Appropriate and effective mitigation measures must be developed to lessen these impacts wherever possible
6. Should the mine be approved, Augusta Resource Corporation should be required to purchase lands of equivalent acreage and natural and cultural value as mitigation land for preservation purposes and retire mineral rights and other potential for disturbance.

September 12, 2007

**Project Information Review**  
Rosemont Copper Project  
Augusta Resource Corporation

To: Nicole Fyffe  
Executive Assistant to the County Administrator

From: Jeff Kreamer  
Program Manager, NRP&R

Nicole,

I have reviewed the Reclamation and Closure Plan for the Rosemont Copper Project, (July, 2007). The following comments or concerns are based on information provided by Augusta Resources in the R&C Plan, or other information supplemental to the Mine Plan of Operations prepared for the US Forest Service. The information reviewed is complex in nature, and would require a nearly full time effort to review in detail. As a result, all comments contained herein, are based on a cursory level review of project data.

Also included are observations and comments based on my personal knowledge of the historic copper deposits of Arizona, and nearly thirty years as an active US Mineral Surveyor. In some cases, my comments are opinions serving as "food for thought".

Although I am personally opposed to mining in this area of significant ecological and historic value, I will remain objective and mindful of the fact that Augusta has the legal rights necessary for the development of this mineral resource, subject to meeting regulatory conditions.

My observations cover different issues that can be grouped as follows:

1. Historical considerations, and the validity of discovery.
2. The current mining industry in Arizona.
3. Water quality protection.
4. Importance of mitigation monitoring and environmental assurances (bonding).

1. The Rosemont – Helvetia District is an historic mining district composed of several small mines that operated from the 1890's, through the 1950's. After this productive period, the area was controlled by larger companies that held their properties until copper prices reached a level to warrant additional exploration

and verification of a larger discovery of economic minerals. Over the decades, many mining properties within this region were held and/or sold for speculation reasons. Examples include the 3R Mine, and Red Mountain Deposit in the Patagonia Mountains. North of Rosemont, and in the area of Corona De Tucson, lies the Cuprite Deposit, which is too deep for economic development. Most of these deposits including Rosemont, were considered "teaser districts", which are ideal for speculation. Considering the decades of exploration, and assessment work necessary to maintain the unpatented mining claims, I am surprised at the quantity and grade of the ore body recently defined by Augusta. The discovery of a viable economic deposit is critical, and triggers the rights to pursue mining operations under the Mining Law of 1872. It also sets the stage for establishing a value should the owners decide to sell the property rather than initiate mining activity.

2. Much of the current mining activity in Arizona is being conducted by small companies with limited assets, individual entrepreneurs', and foreign based companies such as Augusta Resources. This is a dramatic change from recent decades where mining activity was dominated by large American Companies such as Phelps Dodge, Kennecott, or ASARCo. Environmental mitigation plans must be constructed to insure that operating companies have the financial resources to cover all compliance issues.
3. The single largest environmental concern I have with the Rosemont Plan of Operations, is Water Quality Protection. The methods chosen for ore processing involve high grade sulfide concentration and heap leaching of oxide ore. Both methods can result in significant storm and ground water contamination if there are design and engineering flaws. In addition, the long term possibility of acid rock drainage through the inert rock buttress may increase with time. Acid rock leaching of old mine dumps has contributed to base metal contamination of Sonoita Creek, and other seasonal streams around Patagonia. Storm water issues are based on 100 year, or other levels of storm events. Anomalous storm events can and do occur, and may lead to unexpected degradation of protective caps and buttresses.
4. The Reclamation and Mitigation Plan will be executed concurrently with mining operations. This will lead to an incremental bonding approach, and phased release of bond moneys as compliance measures are met. Care must be taken to insure adequate compliance monitoring throughout the life of the project. The potential for acid drainage and other environmental problems long after mining ceases, should be considered in the bond requirement. The determination of bonding amounts and conditions, must include input from all interested parties. Participation in this process is an important role for Pima County staff. Careful



Beverley A  
Everson/R3/USDAFS  
05/19/2008 05:27 PM

To Nancy McCoy <theduquesnehouse@hotmail.com>  
cc  
bcc  
Subject Re: Rosemont Copper information

Hi Nancy,

Here is the Coronado's website, which includes a link to the Mine Plan of Operations (MPO) and other information on the project:

<http://www.fs.fed.us/r3/coronado/rosemont/>

According to the MPO (p. 53), the proposed operation would employ 494 people. I'm unable to direct you to the most accurate estimate of revenue to be generated from the operation, as that information will be part of the alternatives that will come from the Environmental Impact Statement analysis (that we are just now beginning).

Bev

Beverley A. Everson  
Forest Geologist  
Coronado National Forest  
300 W. Congress Street, 6th Floor  
Tucson, AZ. 85701

Voice: 520-388-8428  
Fax: 520-388-8305

Nancy McCoy <theduquesnehouse@hotmail.com>



Nancy McCoy  
<theduquesnehouse@hotmail.com>  
05/19/2008 09:47 AM

To "beverson@fs.fed.us" <beverson@fs.fed.us>  
cc  
Subject Rosemont Copper information

Hi, Beverly-

I attended the FS Hearing at Elgin last week, and wondered if you could direct me as to where to find some information about what one of the speakers said. Ron Pace, who works for Augusta, spoke after Congresswoman Giffords and mentioned the number of jobs and revenue the proposed Rosemont mine might bring to the area. I know this information is available elsewhere, but it seems to vary with the speaker and I want to make sure I have Augusta's most current estimate. Is this information available online yet, and, if so, where on the FS website would I find it?

Thanks so much,

Nancy

Nancy McCoy  
*The Duquesne House Bed and Breakfast*  
P. O. Box 162  
Patagonia, AZ 85624  
520-394-2732

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E-mail for the greater good. [Join the i'm Initiative from Microsoft.](#)



"Victoria Ames"  
<Victoria.Ames@pima.gov>  
05/19/2008 02:13 PM

To jderby@fs.fed.us  
cc beverson@fs.fed.us  
bcc  
Subject Rosemont Copper Project EIS

*Please see attached from Mr. Huckelberry*

Thank You,  
Victoria Ames

Chuck Huckelberry  
County Administrator's Office  
130 West Congress 10th Floor  
Tucson, Arizona 85701  
(520)740-8387



jd-rosemont.copper.project.EIS.pdf



## COUNTY ADMINISTRATOR'S OFFICE

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C.H. HUCKELBERRY  
County Administrator

May 19, 2008

Jeanine Derby  
Forest Supervisor  
Federal Building  
300 West Congress  
Tucson, Arizona 85701

Re: Rosemont Copper Project EIS

Dear Ms. Derby:

This letter is part of the County's continuing comments during the Environmental Impact Statement Scoping comment period for the proposed Rosemont Copper Mine project. The purpose of this specific letter is to ask for clarification on a number of issues and to ensure that certain matters are included in the EIS analysis of the proposed Rosemont action. First, I believe the Federal Register Notice requires some clarification, either by amendment or new notice.

### Federal Register Notice Confusion

The purpose of the scoping period under NEPA is to notify those who may be affected by a proposed government action that the Forest Service is beginning the EIS process. This notice requirement is to ensure that interested parties are aware of, and are able to participate meaningfully in, the entire EIS process from start to finish. The scoping period should also identify the issues that need to receive in-depth treatment in the EIS and in determining the range of actions, alternatives, and impacts from the proposed government action. The duty of the Forest Service during the scoping period is to provide adequate notice and begin a meaningful dialogue (40 CFR §1501.7).

From the publication of Federal Register Notice this process has not met this required standard. Your Federal Register Notice of February 28, 2008, finally mentions the word "scoping" on Page 5 of the internet printed notice. It states, "Following the 30-day scoping period announced in this notice, the Forest Service will prepare a draft environmental impact

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statement (DEIS)." However, on Page 1 of the notice it states that comments ". . . concerning the scope of the environmental impact statement (EIS) analysis must be received by the Coronado National Forest (Forest) within 30 days following the publication of this notice in the Federal Register." And again on Page 5, it states "Although comments are welcome at any time during the NEPA review, they will be most useful to use if they are received within 30 days following the publication of this notice."

As a fairly sophisticated public agency, we are somewhat confused about this notice. The general public must be completely confused as evidenced by the hostility expressed in early public meetings on this matter. In the early meetings it is obvious the public simply did not understand what they were being asked to provide. I am sure that they have little understanding of the "scoping process." Your notice states "within 30 days" in one location and "comments are welcome anytime" in another, and finally, "following the 30-day scoping period." The public must be confused as to what they are being asked to provide. There cannot be meaningful participation when the public is confused.

Finally, in the "ACTION: Notice of intent to prepare an Environmental Impact Statement" there is no indication of a scoping process being initiated, except for that section in the notice under "dates." We believe there should be re-notice in the Federal Register that is specific regarding scoping and specific regarding the purpose of the early informational meetings, which could not have been construed as scoping meetings given this notice. The new or amended notice should also include the extension of the comment period to at least the July 14, 2008 date, as announced by the Forest Service in response to Congresswoman Gifford's request, and the additional three public hearings being held currently.

#### **Purpose and Need Do Not Conform to NEPA Standards**

In the Federal Register Notice of February 28, 2008, on Page 3 of the internet-produced copy of the notice, the purpose of and need for action is defined as "The purpose of the proposed Forest Service action is to grant permission to the Company to use NFS land for certain activities related to operation of the Rosemont Mine," while on Page 5 of the notice there are at least three decision alternatives listed, including no action. If the no action alternative is selected, how can permission be granted? Forest Service officials have stated on multiple occasions, dating back to the Congressional Field hearing held in Tucson on February 24, 2007, that the Forest Service cannot deny this mine. How can the Forest Service sufficiently analyze a no action alternative after making such statements?

Another flaw in the purpose and need statement is that it is only for activities relating to operation of the mine. Does the Forest Service intend not to make any decisions with regard to closure or post-closure activities?

This purpose statement as it is currently written is inadequate, misleading, and unfairly constrains alternatives. Pima County requests that the purpose be modified to state what the project is intended to accomplish, such as " to provide copper from the mineral estate of the United States and to ensure compliance with all state, local and federal laws during and after operation of any activities relating to mining."

### Alternatives to the Proposed Action

This EIS would clearly benefit from a Tiering Process. We are concerned with the development of our limited national resources. Alternatives to the proposed action are too limited or not adequately described. In the alternatives analysis, alternatives should be included that indicate the benefits derived from exploitation of the mineral estate of the nation could be accomplished at different locations and in different manners such that the adverse environmental impacts are significantly less than the Rosemont alternative. Producing copper at another location must be a real alternative. The Forest Service decision should be reviewed at the national level among competing alternatives requiring the preparation of a programmatic EIS (PEIS). At this time there are multiple proposals to develop copper from state, federal and private mineral estates in Arizona (see Attachment 1). At a minimum there should be a regional EIS, which at a regional level evaluates regional considerations. These should be completed before the site specific EIS. This process has been used by the Federal Aviation Administration to evaluate choices and alternatives to providing national aviation services.

We believe that such an alternatives analysis is certainly contemplated within the National Environmental Policy Act (NEPA). However, we also understand that such an interpretation would be fertile ground for litigation. Nevertheless, we believe such an alternatives analysis is exactly what was contemplated in the Act – to arrive at the least environmental harm for the same benefit. The concept of the alternatives analysis described above is clearly relevant in today's global economy. By what means will alternative proposals for copper extraction from the nation's mineral estate be weighed?

### Water Impacts Are a Major Issue

The Upper Santa Cruz River groundwater basin is not in equilibrium and is in serious jeopardy due to the groundwater overdraft proposed by Rosemont. This is an irreversible and irretrievable commitment of vital water resources. Rosemont has initiated a slight-of hand solution to this problem by recharging Central Arizona Project (CAP) surface water. However, they are recharging this water in the Avra hydrogeologic basin 36 miles away and 800 feet below the proposed well fields. The proposed well fields are located in a different hydrogeologic basin where the aquifer is shared by residents of the Town of Sahuarita, City of Tucson, San Xavier District of the Tohono O'odham Nation, and unincorporated Pima County (Attachment 2). This replenishment is of no benefit to the affected area and would not in any way offset the groundwater depletion contemplated by Rosemont. It merely displaces CAP water that would otherwise be stored by the Arizona Water Bank in Marana.

There are numerous news reports of Rosemont extending a distribution pipeline to convey CAP surface water to a recharge site yet to be defined without specifics, contracts or financial commitments by Rosemont. This pipeline is of little or no benefit without recharge facilities that must be directly interrelated to the groundwater that is proposed to be withdrawn by Rosemont. In addition, the quality of the surface water being replaced to offset Rosemont groundwater depletion is vastly inferior in quality to the groundwater being proposed for withdrawal by Rosemont.

Water impacts to urban and agricultural users are a major adverse environmental impact of the Rosemont proposal, consisting of an irreversible and irretrievable commitment of resources, which would not be necessary except for the action of Rosemont. What specific studies will the Forest Service commission to evaluate water resource needs, impacts, and alternatives?

#### Peer Review Process

The responsible agency must thoroughly examine water resources, water quality, air quality, biological resources, economic effects, locally generated plans and cumulative impacts. This project clearly has complex impacts in all these categories, requiring expert analysis and review. Peer review of technical documents has been recommended as a means of improving environmental outcomes, based on a review of NEPA's inadequacies in predicting and mitigating water quality impacts (Attachment 3).

We would suggest that the Service institute an independent peer review process. The County benefitted significantly from a scientifically valid and independent peer review process when developing the sometimes controversial Sonoran Desert Conservation Plan. We believe that the scientific and technical studies necessary for defining the environmental impacts of the Rosemont proposal would also benefit from a valid and independent expert peer review process. Will the Forest Service establish such a process to validate the studies and other information provided by Rosemont? Anything less will be inadequate.

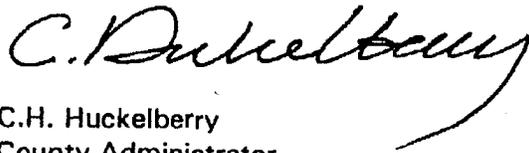
#### Rosemont Information Control

Perhaps the most important component of the public review process for EIS development is related to information development control and release. As previously mentioned, 40 CFR §1501.7 mandates that the scoping process bring about meaningful dialogue with affected parties. This process must be honest and completely transparent. To date, release of technical information to the general public has been largely controlled by Rosemont. The Forest Service receives documents months before they have been made available to the public. One document cited in the Plan of Operation, Westland (2007) Biological Resources and Mitigation Concept: Rosemont Project still has not been released to the public. Nor has the public had access to the Forest Service record of correspondence. This is not acceptable.

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Meaningful dialogue requires the availability of relevant information. The Service must take control of this process to ensure transparency and accountability in developing the EIS of the proposed Rosemont action.

Sincerely,



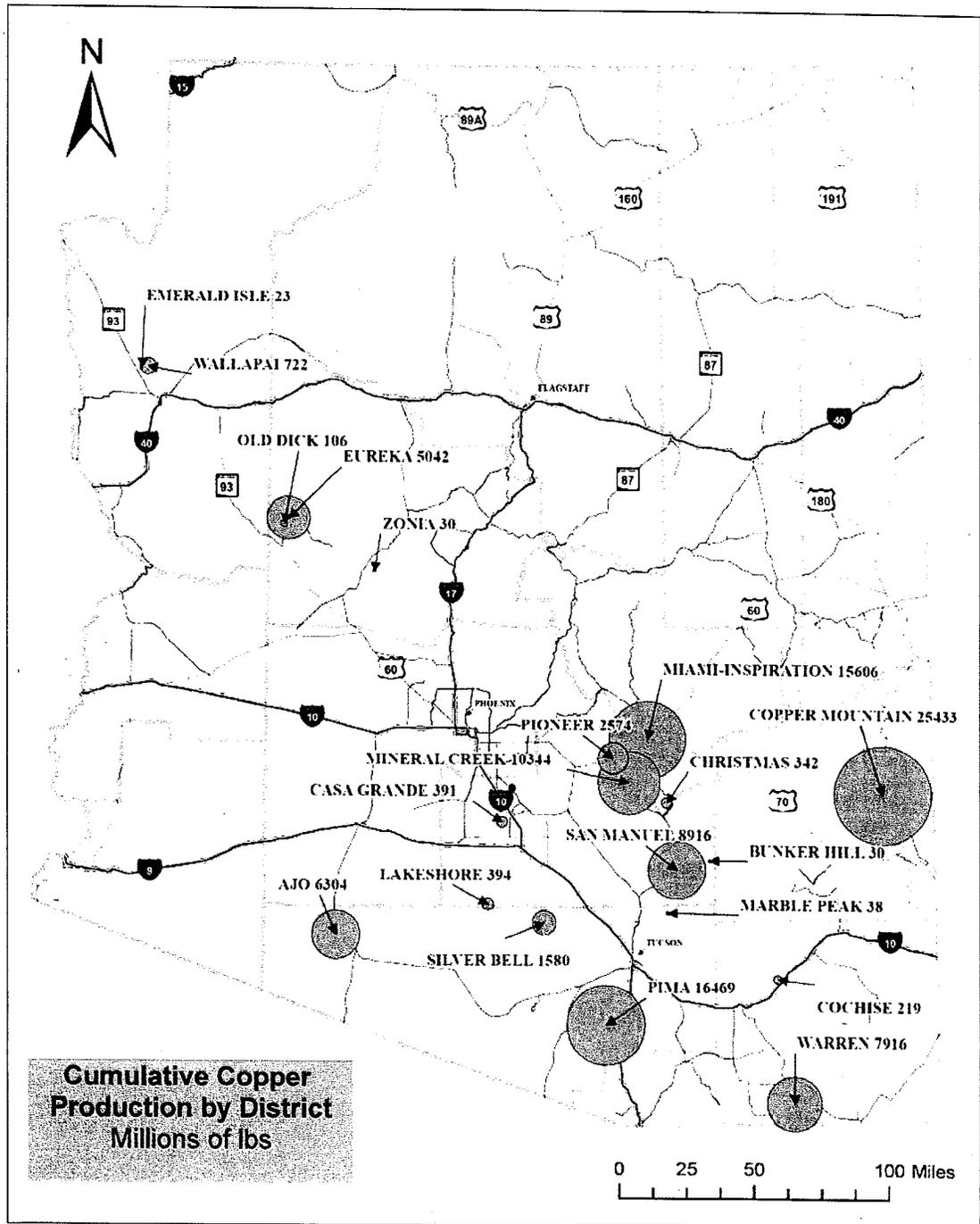
C.H. Huckelberry  
County Administrator

CHH/jj

Attachments

c: Beverly Everson, Geologist, Coronado National Forest

# Arizona's Metallic Resources Trends and Opportunities – 2008



Arizona Department of Mines  
and Mineral Resources

Mining Summary  
2008 Exploration Overview  
Additional Information Sources

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# ARIZONA'S METALLIC RESOURCES TRENDS AND OPPORTUNITIES

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Open File Report 08-26

February, 2008 v1.1

by Nyal J. Niemuth

## Preface

This report was prepared to briefly highlight Arizona's metallic mineral potential and current projects. It was released to coincide with the Department's participation at the Prospectors and Developers Association of Canada (PDAC) convention held in Toronto in March 2008. It has been compiled from annual reports, websites, personal interviews, news articles, and other sources. It is acknowledged that there are additional activities and available properties not listed in this report.

## About: Arizona Department of Mines and Mineral Resources

The Department promotes the development of Arizona's mineral resources. This is accomplished through technical research, field investigations, compilation of information into a mineral occurrence database, and disseminating information through publications, personal contacts, and seminars.

The Department is a service agency and does not regulate, tax, or require any type of registration. The agency provides assistance that is tailored to meet the diverse needs of the public.

The following is a partial list of services that the Department offers:

- ◆ **Maintain a site-specific database of unpublished reports and maps that includes 4,000 mine files and indexes of 10,000 computerized Arizona mineral occurrences.**
- ◆ **Maintain an information bank and library of mineral and mining information including a mine map library (hard copy and microfilm), government publications, periodicals, and unpublished master and doctorate theses.**
- ◆ **Gather and disseminate information on commodities and markets.**
- ◆ **Assist individuals and companies in their dealings with regulatory agencies to facilitate their mining and exploration activity.**
- ◆ **Produce publications in the form of mineral reports, annual directories, technical reports, annual mineral industry surveys and information circulars.**
- ◆ **Operate the Arizona Mining and Mineral Museum.**

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## Mining in Arizona

As it has for many years, **Arizona ranked first in nonfuel mineral production** in the U.S. in 2007 with a production value of \$7.58 billion according to preliminary unpublished figures of the USGS and ADMMR. Arizona leads the Nation in **copper** and ranks in the top five in **molybdenum, sand and gravel, gemstones, perlite, silver, zeolites, and pumice**. Additionally, Arizona produces, or has produced, **zinc, lead, beryllium, vanadium, uranium, tungsten, rare earths, manganese, coal, and at least 18 varieties of industrial minerals**.

In 2006 Arizona accounted for 62 percent of the U.S. copper production. The copper industry had a \$4.7 billion direct and indirect impact on the Arizona economy.

### Arizona Mineral Production

Commodity	2005 Value <sup>3</sup>	2006 Value <sup>3</sup>	2007 Value <sup>3</sup>
Clay (bentonite)		\$1,710,000	1,730,000
Copper	2,640,000,000	4,950,000,000	5,540,000,000
Gemstones	1,370,000	1,560,000	1,580,000
Sand & gravel	516,000,000	662,000,000	597,000,000
Stone, crushed	69,300,000	102,900,000	116,000,000
Other <sup>1</sup>	1,120,000,000	1,040,000,000	1,120,000,000
Coal <sup>2</sup>	290,000,000	190,000,000	200,000,000
<b>Total</b>	<b>\$4,640,000,000</b>	<b>\$6,940,000,000</b>	<b>\$7,580,000,000</b>

1) Includes cement, clay, lime, gypsum, gold, molybdenum, perlite, pumice, silver, salt, dimension stone, and zeolites

2) ADMMR estimate

3) Unpublished USGS data, subject to change; data rounded and may not add to totals shown; final 2005 -2007 data will be published in the Arizona Chapter of the USGS Mineral Yearbook, Area Reports: Domestic 2005 - 2007, volume II

### Copper Mine Production

Mine	2006 (million lbs.)	2007 (million lbs.)
Morenci	815.6	808.0
Ray	232.9	228.9
Bagdad	165.4	202.0
Sierrita	161/6	150.0
Mission	95.6	121.3
Silver Bell	49.9	46.7
Miami	19.0	20.0
Pinto Valley	18.1	27.6
Mineral Park	9.5	11.2
Tohono	5.2	3.0
Safford	0.0	1.0
<b>Total</b>	<b>1,569.8</b>	<b>1,619.7</b>



**Highlights of Current Activity:** Copper prices that averaged \$3.28/pound in 2007 resulted in a record production value of \$5.5 billion. Continued strong demand and high price are driving exploration and development activity to the highest level in many years.

**Morenci:** Freeport McMoRan and Sumitomo invested \$241 million to build the first commercial-scale copper concentrate pressure leach operation. Morenci, Arizona's largest mine, resumed concentration in 2006 to supply feed to the new plants. Two leach vessels have been installed and production is ramping up. Copper production of cathodes will be via electrowinning solutions from the new plants and continuing from heap and dump leaches. Production was 790 million lbs. in 2007. An additional \$100 million will be invested in 2008 to expand mining and EW capacity, increasing production capacity by 100 million lbs. per year.

**Safford Project:** Expenditures of \$675 million were required to construct the giant Safford leach pad, associated SX-EW plant and development of the Dos Pobres pit. First cathode production was reached ahead of schedule in December 2007 and production will increase over the next half year. Development of the adjacent San Juan deposit should begin in two years. Expected output will be 250 million lbs. of copper per year for 18 years.

**Mineral Park:** While continuing to mine and produce cathode copper via leach SX-EW, Mercator has pursued a plan to renew sulfide concentration of copper and the deposit's high-grade 0.04% molybdenum. Construction of a two-stage expansion of a 50,000-TPD mill has been underway since mid 2007. The \$128 million first phase includes a 25,000 TPD mill that should start up in the 2<sup>nd</sup> quarter of 2008. Most of the equipment for phase 2 has been purchased and expansion to 50,000 TPD should be completed by 1<sup>st</sup> quarter of 2009.

Immediately north of Mineral Park Searchlight Exploration has assembled a 2,000 acre prospect that includes the Alum Wash/Apex Hill zone and is seeking a JV partner or lessee to conduct additional exploration.

**Pinto Valley:** BHP reopened the Pinto Valley mine in October of 2007 with an investment \$140 million to rehabilitate the 75k TPD sulfide concentrator. They issued a \$300 million contract to the Washington Group to finish mining the slice 6 pushback containing 85 million tons of mill ore at 0.41% Cu and 37 million tons of leach material at 0.21% Cu. Depending on copper prices, slices 7 and 8 may be mined.

**Other Producers:** A number of Arizona's other producing copper mines are receiving investments of up to \$100 million to increase production to take advantage of the continued high copper prices. These include Asarco's Ray, Mission, and Silver Bell properties and Freeport McMoRan's Bagdad and Sierrita mines.

**Carlota:** In March 2007 a \$200 million loan was arranged for the copper leach project. Quadra has moved forward rapidly with construction of the open-pit and SX-EW facility at Carlota. Completion is anticipated in the second half of 2008. Forecast annual recovery is expected to be up to 75 million lbs. per year for the mine's 11-year life.

**Miami:** Freeport McMoRan plans to restart mining for leach at Miami in 2010. It will invest about \$100 million, primarily for mining equipment. Leaching from existing heaps produced about 20 million lbs. in 2007.

**Rosemont:** Since acquiring the Rosemont property in 2005 Augusta Resource has moved quickly. It completed a 30,000-meter drill program to produce a NI43-101-compliant resource estimate. Proven and probable reserves total 493 million tons at 0.47% Cu and 0.015% Mo. Plus an additional 50 million tons at 0.18% oxide ore. A progressive mining plan has been submitted to the Coronado Forest for mine dumps and plant. Augusta Resource obtained rights to Central Arizona Project (Colorado River) water to store for later withdrawal. Plans include filtering to produce "dry tailings" of less than 15% moisture to reduce water usage. Tailings will be disposed of with the carbonate rock waste that will minimize future acid mine drainage impacts on ground water quality. Additional mineralized areas of the property are beginning to be drill tested.

**Resolution Copper:** This deposit, with its massive size and high primary grade, continues to inspire exploration in Arizona. Resolution Copper Co., a 55/45 joint venture of Rio Tinto and BHP-Billiton continues to define the resource via surface drilling. Preliminary reports indicate a 1.25 to 1.75 billion-

ton deposit grading 1.25% - 1.75% copper plus molybdenum. Rehabilitation work to upgrade the Neversweat tunnel and dewatering of the Magma mine continues in preparation for deepening of the No. 9 shaft. In the fall of 2007 Congress began hearings on the Southeast Arizona Land Exchange and Conservation Act to acquire land essential to development of the deposit. When in production the mine will provide approximately 25% of the United States copper needs.

**Copper Creek district:** Redhawk Resources has acquired a large portion of this district consisting of high-level breccia pipes and lower level porphyry copper deposits. The company has completed a NI43-101-compliant resource estimate for Mammoth, Childs-Aldwinkle, and Old Reliable and Keel zone totaling 6.4 million tons at 1.755% copper equivalent. A drilling program to expand and better define the Mammoth breccia was completed in late 2007 and will update the resource figure. Environmental studies were completed in fall 2007 allowing submittal of permit applications to develop an exploration decline into the breccia resource area. A 70,000-foot drill program to expand the American Eagle porphyry, inferred resource of 150 million tons reported, and connect it to the Keel zone commenced in late 2007. The first step-out drill hole of the program contained an interval of 840.5 feet grading an average 1.4% copper and 0.033% molybdenum. Additional work is being conducted with the goal of preparing updated resources and scoping study for the project in late 2008.

Bell Resources began a 10-hole, 4,500-foot drill program on the Sombrero Butte property including portions acquired from Silver Nickel Mining in 2006. Results reported have included grades of 4.7% copper over plus 20 meters. Encouraged by the earlier results and having tested only 8 of plus 20 breccia pipe targets a Phase 2 drill 12-hole program began in fall 2007 and has recently been completed.

**Zonia and Emerald Isle:** Ascendant Copper Corp. (ACX) announced plans in late 2007 to acquire St. Genevieve Res. (SGV) including its assets Zonia and Emerald Isle. An October 2006 NI43-101 compliant report commissioned by SGV on Zonia in Yavapai County reported an inferred resource of 63 million tons grading 0.37% copper. A third party engineering report prepared as part of ACX's due diligence estimates that the Zonia property can be put back into leach production within 24 months producing approximately 20 million lbs. of copper annually for 17 years.

Emerald Isle is an exotic oxide copper deposit with a small "mothballed" SX-EW plant located west of Mineral Park. A NI43-101 compliant report in March 2006 based on historical drilling concluded that the property contained 2.3 million tons grading 0.62% copper.

**Safford District:** In addition to the major construction project being finished by Freeport McMoRan, there is also much exploration activity in the district. Freeport continues a major drilling campaign in the district with plans to further evaluate the Lone Star deposit.

Franconia Resources confirmed by drilling that the Red Knoll area contains widespread potential host rocks for porphyry copper mineralization at reasonable depths. Three holes were completed in 2007. Hole RK-4 intersected Laramide meta-volcanics displaying intense phyllic alteration, 1-3% pyrite and anomalous copper values from 979 to 2,456 feet. This may indicate proximity to a porphyry copper system. Follow up geophysics and further drilling is planned.

Entrée Gold began to test an IP anomaly on its Sol Dos property with a 6,550-foot drill program planned. Entrée Gold also entered into an agreement with Empirical Discovery LLC to explore for porphyry copper targets in southeastern Arizona.

High Desert Gold (previously General Minerals/Sprott Res.) reported in November 2007 that two 600-meter drill holes were completed at the Markham Wash property optioned by Teck Cominco. Assay results are pending.

Nord Resources completed IP and resistivity geophysical surveys in early 2007 on Coyote Springs. A drill program was planned to test anomalous IP values.

Southwest Exploration Group has assembled biogeochemical and geophysical data identifying two large alluvium covered targets, Safford West and Teague Springs, both available for additional exploration.

**Copper Hill:** In the Turquoise District, Aurelio Resource Corp. is developing a copper-zinc project comprised of the MAN, Courtland and South Courtland areas. Work during the last 3 years included consolidation of surface and mineral control of over 5,000 acres, acquisition of historic information including 190,000 feet of drilling data from 270 holes, as well as 76,780 feet of core from 95 holes. In

addition Aurelio has drilled 41 holes to confirm, step-out and infill the historic drilling data, which has resulted in an additional discovery of near-surface mineralization in the Courtland and South Courtland areas. An independent estimate of the Inferred Resource on the initial MAN discovery has confirmed the mineralization; 63.7 million tons at an average 0.56% copper-equivalent grade. A NI 43-101 Technical Report for the Hill Copper-Zinc project is being prepared.

**Sheep Mountain:** Lone Tree Exploration LLC has acquired this partially delineated copper molybdenum deposit and assembled historic exploration data. The property has had 56 core and rotary holes drilled totaling 75,000 feet. A 2007 preliminary feasibility study on only the supergene portion of the deposit concluded an 8-10k TPD operation could generate a 28% rate of return at \$1.50/lb. Cu and \$12/lb. Mo. The report is available at [www.ammexgoldmining.com](http://www.ammexgoldmining.com) The property is available for lease or purchase.

Lebon Gold Mines controls a second area of mineralization at Sheep Mountain, west of the previously mentioned area. A drill program of 3 holes totaling 2,026 feet in 2007 found significant thicknesses of copper oxide mineralization. The holes however failed to reach to the redox boundary where historic reports of higher grades of chalcocite up to 0.8% had been reported. The company is debating further solo work or opting for a joint venture partner.

**Troy Ranch:** Big Bar Gold completed 4 drill holes late 2007 on the Troy Ranch prospect east of Ray where it has earned a 51% interest in a joint venture with Freeport McMoRan. Numerous intercepts of copper and molybdenum mineralization were encountered along with long potassic-altered intervals coincident with an AMT geophysical target.

**Yuma King:** Step out drilling by Big Bar Gold resulted in the discovery of a porphyry copper system with significant molybdenum values in a Jurassic age thrust fault complex. Favorable geology continues to the northeast and southeast that remains to be tested.

**Kabba:** An initial 4-hole 3,600-meter drill program by Bell Resources targeted a suspected down-faulted porphyry copper system indicated by geophysical surveys. All holes showed indications of proximity to a porphyry copper/molybdenum system. Drill hole K-4 penetrated altered and weakly mineralized granite that may be the outer shell of a porphyry copper system. A follow up drill program is being planned.

**Four Metals:** Black Pearl Minerals Consolidated completed a Phase I drilling program on this breccia pipe in 2007. The 7-hole drilling program totaled 996 meters. It confirmed grades of historic efforts while adding width and depth to the south and east sides of the deposit. Permitting is underway for additional drilling.

**Monitor:** Monitor is a silver gold prospect located 3 miles northeast of the Ray mine. High Desert Gold (previously General Minerals/Sprott Res.) reported that Teck Cominco terminated the joint venture agreement. Their final report recommended that two IP anomalies be drill tested for deeper porphyry copper mineralization.

**Gold Hill:** Teryl Resources reported in early 2008 that five RC drill holes had been completed on four separate copper targets on this patented property southeast of Bisbee. The highest grade intersect was at a depth of 275-280 feet with 4.84% Cu reported.

**Mesa West, Red Hills, Silver Bell West and Superior West:** In April 2007 Bell Resources entered into an alliance with Bronco Creek Exploration to jointly explore these projects, drawing on the strength of the geologic team of Bronco Creek. A drilling program has begun at Mesa Well to test a magnetic anomaly below gravel cover. Red Hills, based on previous exploration, has been reported to contain 500 million tons at 0.1% of copper oxides. Structural reinterpretation and geophysics suggests rotation of the deposit. Deeper portions of the system will be drill tested. Work at Silver Bell West is focusing on mapping and geochemical sampling to identify porphyry/skarn targets hosted in Paleozoic rocks below Mesozoic volcanics. Permitting is underway for a 2008 drill program. At Superior West there are two target types, the down-dropped extension of the high grade Magma vein system and the suspected deep-seated porphyry copper source for the vein mineralization. Drilling is scheduled to begin in the 1st quarter of 2008.

**Middlemarch:** This district contains multiple copper zinc silver skarn and deep-seated porphyry copper targets. In fall 2007 Southern Silver acquired an option on 68 claims and 4 state leases and is

planning a 3 to 5-hole, 1,500 meter core drilling program. Separately Minquest reports its claim block in the district is available for joint venture or lease.

**Tombstone South:** Southern Silver has acquired a large land package that contains multiple porphyry copper and silver replacement targets. Late in 2007 it began an initial core drill program that may total 2,000 meters.

**Squaw Peak, Copper Springs, CB, and Sunnyside:** American Copper has acquired these four porphyry copper molybdenum properties that contain resources reported by major companies during the early 1970s. Squaw Peak is reported to contain 20 million tons grading 0.4% Cu and 0.03% Mo. Copper Springs has a reported 20 million tons grading 0.4% Cu. Both properties are expected to have drilling programs initiated in the first quarter of 2008.

At the CB and Sunnyside, American Copper's current work program is geologic mapping and data compilation. The CB property in Yavapai County is estimated to contain 500 million tons of low-grade copper molybdenum mineralization based on previous wide spaced drilling. The Sunnyside has been reported by the USGS to contain a deep resource of 1.5 billion tons of 0.33% Cu with associated molybdenum and silver mineralization. A skarn zone containing a core drilling intercept of 124 feet grading 14% Zn, 1% Pb, 0.03 Mo and 1.4 opt Ag is adjacent to the porphyry copper resource. Four additional targets are possible. The CB and Sunnyside projects are being considered as joint ventures with larger mining groups.

**Twin Peaks:** The property, located in the northeastern Vulture Mountains, demonstrates widespread surface mineralization. Southwest Exploration Group reports this partially drilled, only 5 holes, copper oxide target is available.

**Mohave West:** Southwestern Exploration Group also has available an 800 acre claim block in Mohave county containing a target evaluated in the 1960s and 1970s. Geologic mapping and IP surveys outlined a large Laramide porphyry copper target. Only four drill holes have tested the system but all intersected thick intercepts of copper mineralization.

#### References

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## Uranium

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**Description:** Arizona's uranium production is largely attributed to deposits located in the southwestern corner of the Colorado Plateau Uranium Province. Between 1980 and 1989 Arizona was one of the leading suppliers of uranium in the United States, producing more than 13 million lbs. of U<sub>3</sub>O<sub>8</sub> from four high-grade breccia pipes.

**General Characteristics:** Arizona's uranium deposits occur in four principal geologic environments: solution collapse breccia pipes, roll front type fluvial deposits in sandstone, deposits associated with lacustrine/paludal sedimentary facies, and metasomatic related vein deposits.

**History:** The first uranium production in Arizona was in 1918 from carnotite-bearing sandstone deposits located in the Carrizzo Mts. Arizona reached its production peak in 1958 with 1.6 million lbs. of U<sub>3</sub>O<sub>8</sub> from 82 mines. Between 1947 and 1970 Arizona produced more than 18 million lbs. of uranium oxide and 42 million lbs. of vanadium oxide.

Price decline caused a reduction in uranium exploration and mining in the early 70s and again in the 90s. The late 70s and early 80s saw renewed interest in Arizona's uranium potential with the

producing breccia pipes averaging 0.65 percent  $U_3O_8$ . Previously mined breccia pipes include the Orphan, Kanab North, Pigeon, and Hack deposits with total production exceeding 17 million lbs. of  $U_3O_8$ .

Renewed exploration in the Date Creek Basin resulted in a major discovery. Estimates based on drilling done by U.S. Department of Energy in the 1970s indicate that the Date Creek Basin Miocene lacustrine sediments may host 1.2 billion lbs. of  $U_3O_8$  at depths up to 3,500 feet.

**Breccia Pipes:** Breccia pipes are collapse structures formed when sedimentary strata collapses into caverns formed from the dissolution of the underlying Mississippian Redwall limestone. The pipes are generally 300 feet in diameter and may extend 3,000 feet vertically. Thousands of these collapse structures exist in northern Arizona; most are hidden and require diligent exploration to find. The potential for new discoveries of high-grade uranium breccia pipes is excellent. Dozens of mining and exploration companies continue aggressive land and claim acquisitions. Exploration work continues with companies utilizing ground and aerial geophysics, surface mapping, geochemistry, and follow up drilling to confirm stratigraphy and mineralization at high priority targets. Geological investigations done in the Hualapai Reservation show over 900 pipes with approximately 8% of them having recognizable mineralization or anomalous gamma radiation. In the 1980s hundreds of suspected breccia pipes were discovered through the use of satellite imagery and surface ground domain electromagnetic geophysical surveys. Hundreds, or perhaps thousands, of potentially mineralized breccia pipes, remain untested.

**Current Activity:** Denison Mines Corp. controls seven mineralized breccia pipes and a sandstone type deposit on the Arizona Strip. Denison anticipates its fully developed Arizona 1 (70,000 tons at 0.68%  $U_3O_8$ ) will be on-line by mid-2008. Denison's other Arizona properties include the developed Pine Nut deposit (99,000 tons at 0.40%  $U_3O_8$ ), the partially developed Canyon Pipe property (70,000 tons at 1.0%  $U_3O_8$ ), and the Moonshine Springs sandstone deposit with a resource estimate of 775,000 tons grading 0.16%  $U_3O_8$ .

Liberty Star Uranium and Metals continues exploration on their North Pipes Project in the Arizona Strip, with encouraging results from their extensive geochemical sampling campaign. Drilling is underway on the Neola property, a confirmed breccia pipe, with three other high priority targets scheduled to be drilled.

Mesa Uranium drilled two holes to test and confirm previous drilling conducted on the Moonshine Springs deposit by Exxon in the 1970s. The drill holes confirmed the Exxon intercepts of 6 feet at 0.40%  $U_3O_8$ . The deposit is a mile from Denison's Moonshine Springs deposit.

Vane has five confirmed pipes out of 39 properties, with the Miller Pipe containing a 20-foot drill intercept of 1.8%  $U_3O_8$ . Seventeen targets have shown mineralization at the surface.

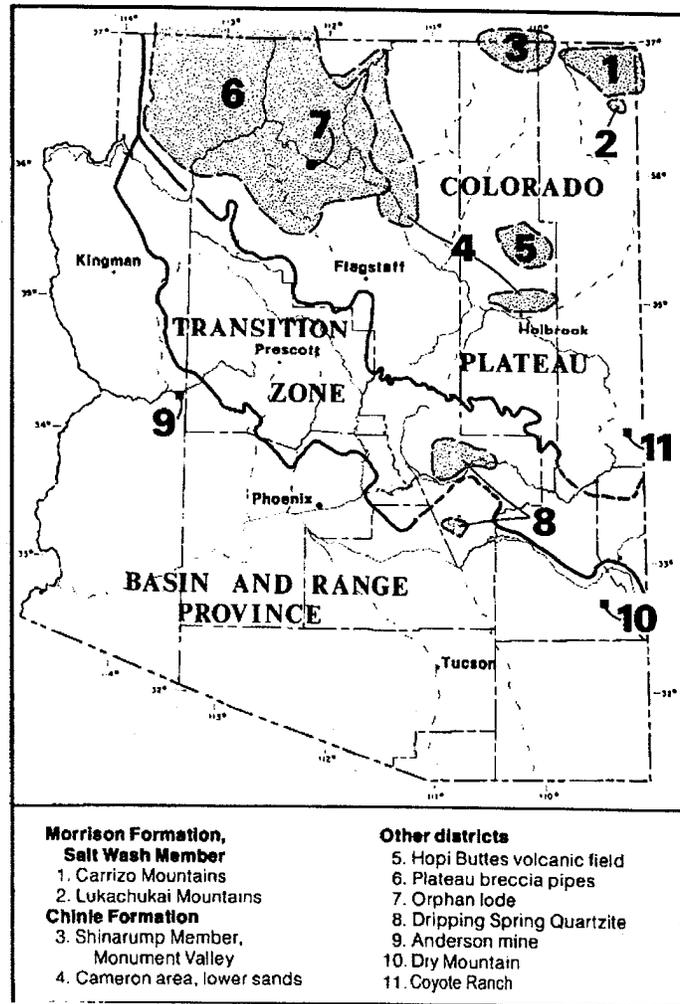


Figure 2. Areas of uranium production and occurrences – Adapted from Fieldnotes Vol. 10 no. 4

Quatara, in early 2007, contracted Geotech Ltd. to conduct the first extensive test of an airborne time-domain electromagnetic system on the Arizona Strip to identify mineralized collapse structures. The VTEM system has identified anomalies related to collapse structures in a majority of the known breccia pipes as well as 200 additional anomalies with similar geophysical signatures. The VTEM system may prove to be a successful breccia pipe exploration tool. Quaterra has drilled 17 prospective targets; 9 tested negative, 5 intersected breccia structures and need deep drilling, 2 intercepted mineralization and need additional drilling, and 1 VTEM anomaly is being drilled.

VMX Resources has optioned the Rose pipe from Energy Metals (now Uranium One). Historic drill information on the Rose pipe shows an intercept of 11 feet of 1.0%  $U_3O_8$ .

Takara Resources and DIR Exploration's Kaibab Joint Venture project has identified seven drill ready breccia pipe targets discovered as a result of previous geophysical and geochemical surveys.

Tournigan continues active drill programs on prospective targets in the Arizona Strip and Coconino Plateau.

Dumont Nickel has acquired 132 unpatented mining claims (Redwall Uranium Property) also on Strip. Air photo and remote imagery interpretation completed in October 2007 identified 43 circular photo-anomalies on the property that are possible manifestations of buried breccia pipes. Ground follow-up of the targets by Dumont field crews during November led to the discovery of five collapse features with diameters ranging 200 to 600 feet. Continuation of field surveys will delineate future drilling targets.

Energy Fuels has 25 pipe targets. Five of the targets are confirmed breccia pipes based on historical data from prior drilling results. Exploration efforts are underway to systematically explore all of the potential pipe targets.

Eagle Hill Exploration has acquired the Rimshot and Lombardo exploration properties with a total of 157 potential pipe targets.

**Metasomatic Veins:** The Dripping Springs formation in central Arizona is a past uranium producer. The uranium occurs as narrow veins and disseminations within low-grade metamorphic rocks of Proterozoic age. The ore zones are typically stratabound and occur near diabase dikes and sills. Ore from past production averaged 0.12 % to 0.22 % uranium.

**Current Activity:** Rodinia Minerals currently controls the Workman Creek and Red Bluff properties in the Sierra Ancha Mountains. Recent estimates from drilling indicate resources of over 9 million lbs. of  $U_3O_8$ . Previous production from mines in the area total more than 115,000 lbs. of  $U_3O_8$ .

Golden Patriot's multi-hole drilling project on the past producing Lucky Boy mine has returned positive results showing  $U_3O_8$  grades from 0.12% to 0.13%. Past production from the mine included more than 2,000 tons of 0.16 % ore in the 1950s and 10,000 lbs. of  $U_3O_8$  from heap leach operations in 1979.

**Lacustrine/Paludal Type:** Resource studies show that the Date Creek Basin may contain large low-grade resources on the order of 1.2 billion lbs. of uranium. There are a number of past producing mines and previously drilled properties that have been acquired in the Date Creek, Safford Basin, and New River areas of Arizona. Most of the properties are situated within Tertiary age lacustrine/paludal sedimentary rocks. The uranium mineralization occurs as stratabound units in carbonaceous siltstones and mudstones. These sedimentary rocks were deposited in alkaline or saline lakes. Uranium mineralization is related to the calcrete deposit model that hosts some of the largest uranium resources in the world.

**Current Activity:** Concentric Energy is evaluating extensive historic data on the past producing Anderson Mine. Confirmation drilling, completed in late 2006 verified 43% of historic resource estimates. Universal Uranium has acquired properties further west in the Artillery Peak area with uranium mineralization and stratigraphy similar to the past producing Anderson Mine. Uranium Energy is evaluating historic data for its Dry Mountain deposit southeast of Safford and New River, aka Los Cuatros, property located north of Phoenix.

**Roll front/Fluvial deposits:** The Mogollon Rim in central Arizona has 80 linear miles of Paleozoic rock outcrops. Anomalous radioactivity and anomalous uranium in outcrops is widespread. Excepting Promontory Butte, little systematic exploration of the area has occurred. The host rocks for the deposit are the Pennsylvanian and Permian age Supai group. Mineralization is associated with coalified plant remains and is located in fluvial channels with variable lithology grading from black shale to conglomerate.

**Current Activity:** Rodinia Minerals drilled its Mormon Lake property to confirm stratigraphy and mineralization outlined in previous exploration data. Uranium Energy is currently reviewing historic information on its recently acquired Coyote Ranch property east of Springerville. Occidental Petroleum drilled 14 holes in 1981 that indicated uranium mineralization in the Tertiary age de Baca formation at depths less than 300 feet that may be amenable to in situ recovery.

**Arizona's Exploration Potential:** Fueled by high uranium prices exploration for uranium in Arizona is at level not seen since the uranium boom of the 1950s. Facilitating uranium mining in Arizona, Denison's White Mesa Mill located in southeast Utah has initiated an ore-buying program for independent uranium mining operations to sell their uranium ore to Denison. The ore-buying schedule ranges from \$55.31 for 0.01% grade material to \$281.16 for 0.35% grade material. Denison is also offering a transportation allowance ranging from \$5.00 to \$22.50 per ton depending on transport distance.

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- Arizona's Uranium 2008, Google Earth KML file, available on line at: [www.mines.az.gov/info/AzUranium.zip](http://www.mines.az.gov/info/AzUranium.zip)

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## Gold

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**Description:** Arizona's cumulative gold production exceeds 16 million ounces contributed from 219 metallic mineral districts. Twenty-six of those districts have produced more than 100,000 ounces and 46 have produced more than 10,000 ounces. Arizona hosts a number of deposits with known potential to produce a few hundred thousand ounces or more. Gold recovery has been from a wide variety of deposit model types with the most important being epithermal (quartz adularia) veins, the more recently recognized detachment fault-associated deposits, porphyry copper, and volcanogenic massive sulfide. Economic deposits have formed during four widely diverse geologic periods: Proterozoic, Jurassic, Laramide, and Mid-Tertiary.

**History:** Recent primary producers include: Copperstone - produced 500,000 oz, McCabe (Gladstone), Verdstone, Congress, and Gold Road, the last to operate, closed in 1998.

**Current Activity:**

**Copperstone:** The property, with 335,000 oz of measured and indicated resources, is viewed as having potential as a near-term, oxide, high-grade, underground producer with a short permitting and construction timeline. Two new gold zones were discovered in the recently completed two-phase drilling program, consisting of 44 drill holes totaling 43,227 feet. In February 2008 owner American Bonanza signed a letter of intent to merge the company into a wholly owned subsidiary of Gryphon Gold Corporation.

**Yarnell:** Kinross acquired Yarnell by acquisition of BEMA Gold in late-2006. CaNeV Resources Corp. then acquired the property. In January 2008 General Properties signed a letter of intent with CaNeV and Yarnell Mining to acquire a 70% interest. Asarco has previously identified 7.3 million tons of 0.037 oz. per ton Au.

**Verdstone:** Two additional resources have been identified at past producer Verdstone. A drift to collect a bulk sample for metallurgical testing is being permitted. A private group holds the property; Fred Brost of Phoenix is the project engineer. The group plans to develop a millsite on private land nearby.

**Margarita:** Patriot Gold controls the Margarita mine area covering approximately 900 acres of patented and unpatented mining claims. A historic resource of approximately 35,000 ounces of gold exists near the center of the claim holdings. A drilling program will be carried out the first quarter of 2008 to test for high-grade faults that feed the near surface cap of disseminated mineralization.

**Burro Creek:** Northern Freegold Resources controls this 2,000-acre property consisting of four patented claims and 100 surrounding unpatented claims. It covers a low-sulphidation epithermal vein system that has been traced for over 1.7 km and exhibits widths of up to 45 meters. Previous reverse circulation, diamond drilling and underground development conducted on the property focused on a 300-meter strike length in the central block of the exposed vein system and outlined a historical gold and silver resource of 2.6 million tons with an average grade of 0.03 oz gold and 1.1 oz silver per ton. Within this historical drill-proven resource, an open pitable resource of 1.2 million tons grading 0.04 oz gold and 1.470 oz silver per ton respectively with a 1:1 stripping ratio was defined.

**Rosebud:** Kent Exploration Inc. holds a 100% option on the property. It includes 40 unpatented claims and adjacent deeded land with 2,600 feet of underground workings that were developed between 1928 and 1930. A 1,500-meter diamond drill program was started in Sept. 2007 with assay results received on three of the seven holes in February 2008. The highest grades were 18.45 g/t Au and 18.9 g/t Ag over 1.5 feet between 193 to 194.5 feet and 5.73 g/t Au and 42.9 g/t Ag over 1.5 feet between 223-224.5 feet.

**Gold Gulch:** In August 2007 Ventura Gold commenced a core drilling program at the 100% held property located approximately two miles southwest of Freeport McMoRan's Morenci copper mine. One core drill rig has been mobilized to site and completed the first hole to a depth of 1,195 feet. They plan to complete six to eight drill holes for a total of 10,000 feet.

**Hardshell:** Wildcat Silver Corporation is an 80% owner along with Arizona Minerals Inc. The company commenced a 7,500-foot drill program in July 2007 to obtain material for metallurgical testing and to explore as-yet untested deeper extensions of Hardshell mineralization. In February 2007 a preliminary

assessment of an inferred resource of 53.5 million ounces of silver along with 1.2 billion lbs. of manganese was announced.

**Tombstone District:** Tombstone Exploration Corp. has assembled a large land package in the historic silver district and conducted sampling of surface and underground workings. They completed a RC drill hole in March 2007 to a depth of 500 feet.

**Gold Hill:** Sage Gold entered into an option to acquire 50% of mineral rights at Gold Hill. Based on 1981 sampling the property has reserves of 30,000 tons at 0.27 opt Au.

**Gold Chain, Roadside:** Goldrea Resources acquired this property with 40,000 oz delineated previously by Western States.

**Burnt Well, Silver District, Clanton Hills:** Columbus Gold is exploring these projects in western Arizona. Columbus sampling of the Burnt Well shaft yielded values up to 1.0 opt gold. Also of considerable interest are disseminated values ranging from 0.01 to 0.03 opt Au in silicified Tertiary

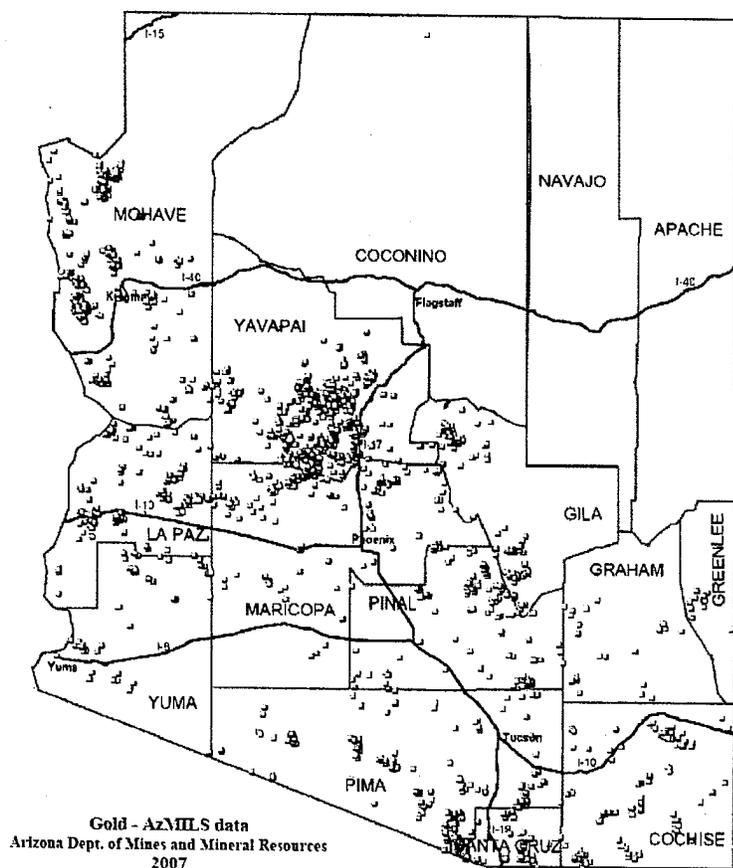


Figure 3. Primary and by-product gold occurrences.

siltstones, over widths up to 20 feet or more. At Silver District past programs delineated a resource of 3,820,000 tons grading 4.60 ounces per ton silver (17,500,000 ounces) plus potentially commercial fluorite, barite and zinc-lead in a number of deposits. At Clanton Wells reconnaissance sampling of irregularly shaped bodies of quartz and calcite in silicified breccia yielded several samples running from 2-7 opt silver with low gold values (up to 170 ppb).

**Moss:** The mine is controlled by Patriot Gold and consists of over 1,400 acres of patented and unpatented mining claims. Historic reports suggest a resource of between 250,000 and 300,000 ounces of gold occurs within the property boundary. Recent work by Patriot includes drilling and metallurgical sampling. The project may be considered for joint venture.

**Bullard:** Canadian Mining Company Inc. is conducting a soil exploration program to delineate drill targets on the detachment-fault related property.

**Tiger:** Q-Resources Ltd. has entered into a purchase option agreement with Silver Nickel Mining Co. for a land package that includes past-producers in the Tiger - Oro Belle area.

**Cruce Gold:** Fischer-Watt is starting its first drill program on its Cruce Gold property in Pinal County, Arizona. The company will be using an Air-track drill rig to drill a close spaced grid of shallow holes to test four target zones on this 1,200-acre property. The four targets identified to date are surface geochemical anomalies with three of them being areas anomalous in gold and one being anomalous in copper.

The following gold or gold/silver properties are available from the McIntyre & Bauman Group. See [www.mcintyrebaumangroup.com](http://www.mcintyrebaumangroup.com) for locations and details.

**Ambassador:** Precambrian gold and silver deposit with underground and possible open pit.

**Bonanza:** Detachment fault gold / silver deposit. Former Phelps Dodge project.

**Bouse:** Gold and silver detachment fault deposit in La Paz County, Arizona. Former Homestake Gold project.

**Clara Moro, Silverfield Gold:** Gold deposit in detachment fault environment. The Clara property has encouraging results from a drill campaign by Nevada Pacific. The Silverfield may be a hot springs high grade gold/silver deposit in detachment fault environment. It is close to Clara Moro and could be jointly explored.

**Ester Basin:** Gold, silver and copper deposit spatially associated with diatreme in detachment fault environment. Former Phelps Dodge project.

**McCracken Gold:** Gold with silver and copper in breccia zone adjacent to one of Arizona's historic silver producers.

**Mockingbird:** Gold and silver deposit related to detachment fault. Anaconda/Chevron work indicated potential.

**North Rawhide:** Upper plate gold, silver and copper deposit. Former Phelps Dodge project.

**Oatman:** A dozen mines in Arizona's largest primary gold district. Includes patented Lexington gold mine. High-grade Tertiary vein deposit in volcanics with potential for low-grade open pit resource.

**South Copperstone:** Large contiguous claim block adjacent to the Copperstone Mine, Arizona's largest recent open pit gold producer.

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Descriptive model of detachment fault related polymetallic deposits –

[http://pubs.usgs.gov/bul/b2004/html/bull2004detachmentfaultrelate\\_polymetall.htm](http://pubs.usgs.gov/bul/b2004/html/bull2004detachmentfaultrelate_polymetall.htm)

## Volcanogenic Massive Sulfides

**Geology:** Volcanogenic massive sulfide occurrences of Arizona formed 1.7–1.8 Ga. Deposits occur as stratabound-strataform accumulations of iron and base-metal sulfides with variable amounts of gold and silver. They are hosted in a thick sequence of submarine volcano-sedimentary strata metamorphosed to greenschist and occasionally amphibolite facies.

**Economic Geology:** Of the 70 known VMS targets, 48 have reported production. Cu-Zn mineralization with precious metals is economically important in these deposits. Production totals over 55 million tons and three deposits have yielded over 4 million tons each. The majority of the production is from the Verde district. The United Verde mine is reported to currently contain over 20 million tons of mineralization grading 6.6% Zn plus Cu and precious metals.

**Structure and Distribution:** Most orebodies are highly deformed and exhibit high ratios of plunge to strike length. Larger deposits are described as elliptical lenses, or rod like bodies, that plunge steeply and parallel major or minor fold axes. The United Verde mineralization is located within the axis of a major steeply plunging fold. Ratios of plunge length to strike ratio of 3:1 are common and ratios as high as 8:1 are known. Thus most deposits present only limited surface expression. The geographic extent of favorable host rocks is wider than that of known VMS deposits suggesting exploration potential for new discoveries. Lindberg suggested a number of exploration ideas and targets that remain untested.

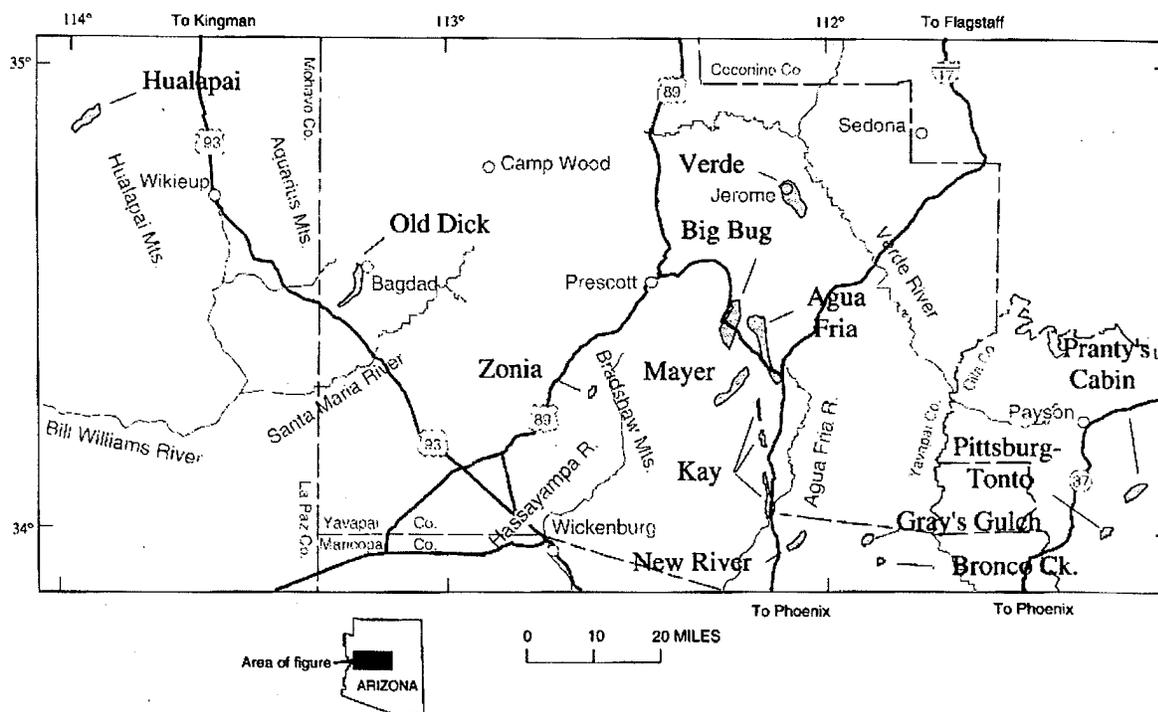


Figure 4. Proterozoic massive sulfide deposits in Arizona. From: USGS Bulletin 2138.

**Current Activity:** The Exploration Syndicate Inc. conducted VTEM surveys during 2007 over broad areas of central Arizona, including the Verde, Agua Fria, and Old Dick districts. Follow-up surface investigation and land acquisition is underway. Mohave Resources has optioned the Blue Bell and De Soto properties and is evaluating their oxide copper potential. The joint venture of Ivy Minerals and Kaaterskill Exploration (IKE JV) has generated geochemical and VLF-EM anomalies within fold axes on two new exploration targets in the Mayer district known as the Cobre Sud and Cordes Peak prospects. These properties are currently available for lease-option agreement to a company willing to accept a work commitment that includes a drill program. Although past exploration by major mining companies

generated much data (see ADMMR files) in the VMS target districts, these areas are currently under-explored (Figure 4).

Many promising prospects, not limited to the few described here, are available for exploration.

In the Old Dick district Silver Nickel Mining has acquired the Pinafore mine (Cu-Zn) and collected exploration data including drill results from Arizona Explorations Inc's. (syndicate of American Barrick, Homestake and Placer Dome) mid-90s effort.

Freeport McMoRan controls the United Verde zinc resource discussed above. Teck Cominco completed a multi-year effort there without releasing results.

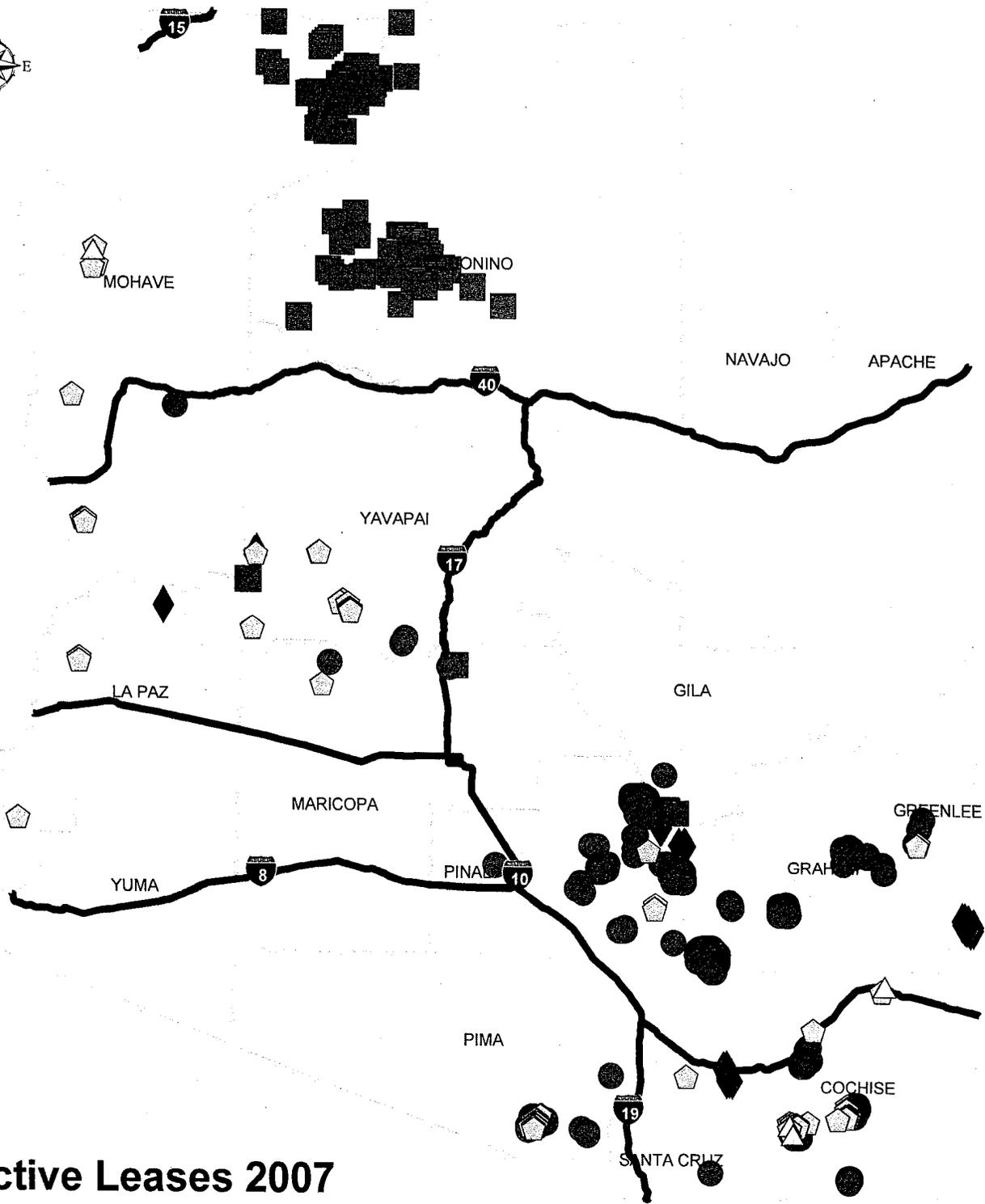
The Kay mine near Black Canyon has a Cu-Zn resource defined by Exxon and Rayrock with drill data available at ADMMR.

Ricks Brothers Enterprises controls a copper resource near Mayer with both disseminated and limited massive mineralization and have project data available. The McIntyre Bauman Group also has large claim holdings in the Copper Mountain trend. In addition, the McIntyre Bauman Group has the following 3 VMS related properties available. Treasure King has a 150,000-ton deposit at a grade of 0.06 oz/ton gold resource along with four additional areas untested by drilling. The nearby Yaba is a high-grade silver deposit with gold. Near Jerome the Middle Verde comprises 5 claim groups and 3 patented claims along the Verde fault that contain un-drilled anomalies from prior work of Phelps Dodge and Oxymin.

Also in the Verde district, Southwest Exploration Group has available the West Jerome VMS located west of Freeport McMoRan's patented ground. The target has favorable stratigraphy under Paleozoic cover with 2 widely spaced drill holes that show strong chloritic alteration with anomalous copper and zinc values.

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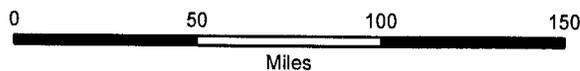
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# Active Leases 2007

## Commodity

- △ Silver
- ⬠ Gold
- Copper
- Uranium
- ◆ Other Metals

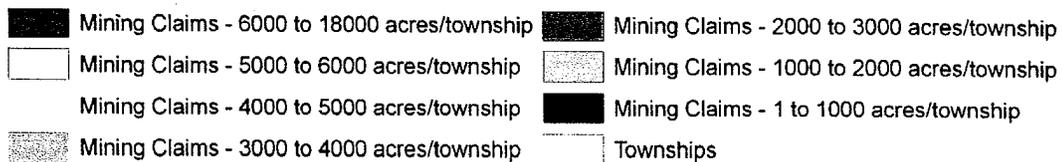
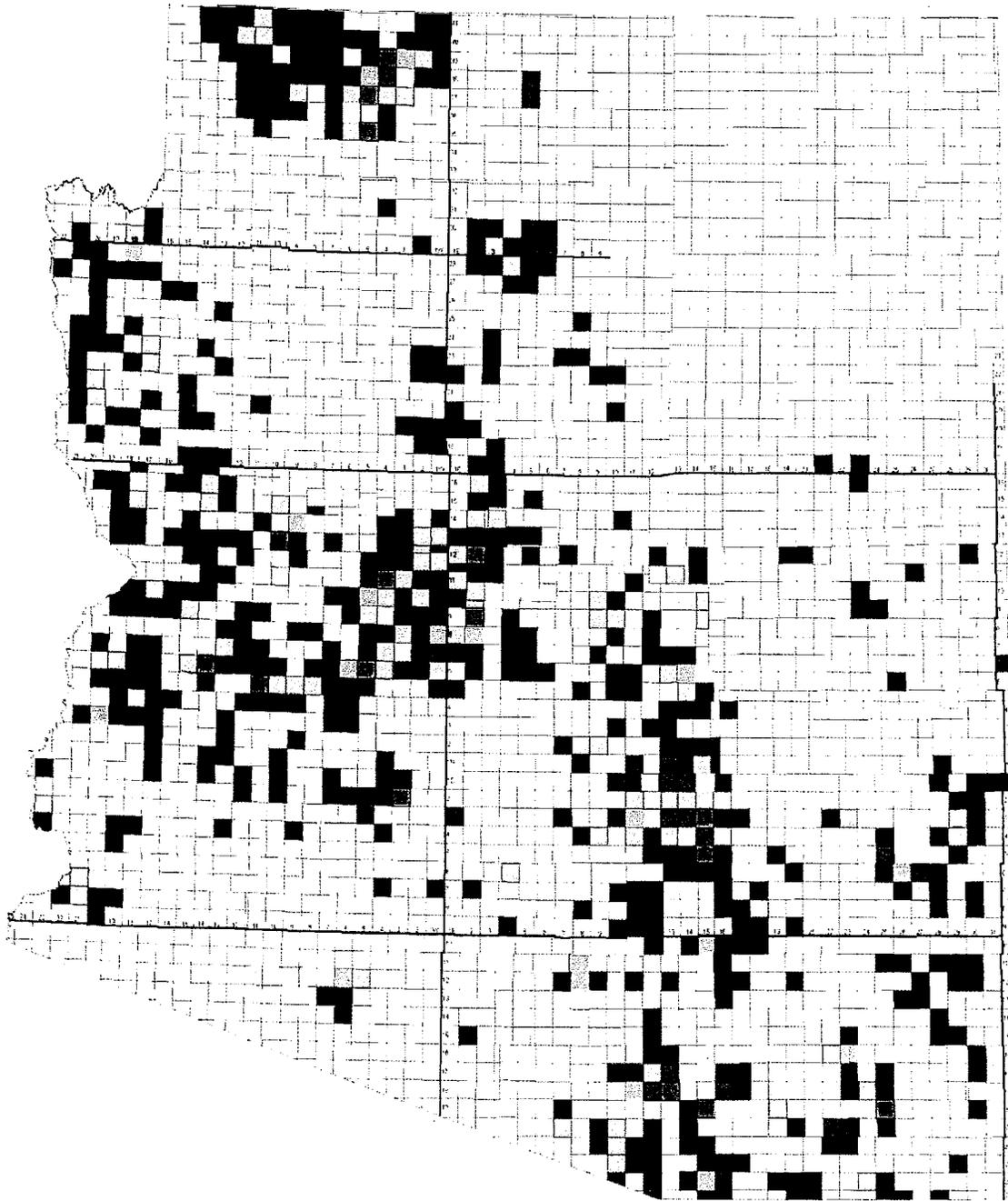


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Michael Dennis

# Mining Claim Distribution on Federal Lands



United States Department of the Interior  
Bureau of Land Management  
Arizona State Office  
Map created on Dec 4, 2006



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25,600 mining claims in 2004  
31,000 mining claims in 2005  
35,000 mining claims in 2006  
38,000 mining claims in 2007 (estimate)

**Mining claim records are online at:**  
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[www.geocommunicator.gov](http://www.geocommunicator.gov) (mapper)



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### DIRECTORIES

**D50 Arizona Mining Consultants**, N. J. Niemuth, 2004. A listing of Arizona-registered consultants for the following mining related disciplines: assayers, geological engineers, geologists, geophysical engineers, metallurgical engineers, and mining engineers. 22 p. **\$3.00 \***

**D51 Directory of Active Mines in Arizona - 2007**, N.J. Niemuth, D.R. Bain, F.S. Kimbler, 2007. This directory lists corporate addresses, key personnel, number of employees, websites, mine, mill, or smelter location, and operation description. Includes a 1:1,000,000 color map showing the locations of all active mines. 34 p. **\$20.00**

### SPECIAL REPORTS

**SR1 Uranium Prospector's Guide**, by K.A. Phillips & M.N. Greeley, 1979. A guide for the independent prospector searching for occurrences of uranium. Chapters on mineralogy and geology of uranium and prospecting methods. 34 p. **\$6.00**

**SR12 Laws and Regulations Governing Mineral Rights in Arizona**, by V.H. Verity and L.D. Clark. 9th Edition, reprinted 1988. A lay language interpretation of federal and state laws applicable to mineral rights. Includes discussions and forms for locating claims on both public domain and State-owned lands. 91 p. **\$8.00**

**SR23 Manual for Determination of Status and Ownership, Arizona Mineral and Water Rights**, by J.C. Lacy, 1999. A detailed explanation of land, mineral rights and water rights ownership status. Includes annotated samples of status maps and indexes. 29 p. **\$3.00**

### MINERAL REPORTS

**MR3 Molybdenum Occurrences in Arizona**, by C.J. Hicks, 1979. Occurrences are listed by county with a brief description of each. The mineralogy, geology, uses and history of molybdenum are provided. 37 p. **\$6.00**

**MR4 Arizona Industrial Minerals**, by K.A. Phillips, 1987. Covers 1400 Arizona industrial mineral occurrences. Location tables and maps. 185 p. **\$12.00**

**MR7 Gold Panning in Arizona**, by D.R. Bain, 1990. Includes the origin of placer gold in Arizona, prospecting tips, panning instructions, and maps to panning locations. 30 p. **\$3.00**

### COUNTY MINE MAP SERIES

Each map set includes a geographically sorted mine index that lists AzMILS number, primary mine name, alternate names, a file reference, topographic quadrangle name, township, range, section, quarter section, and up to 7 commodities. Over 10,400 locations cover the entire series of 12 sets for Arizona's 15 counties. Samples of the maps and indexes may be viewed at the Department website.

Number-County	Number of Maps	Index Pages	Mines	Price
CM-1 - Apache	18	6	353	20.00
CM-2 - Cochise	9	17	698	15.00
CM-3 - Coconino	28	12	594	30.00
CM-4 - Gila	9	19	731	15.00
CM-5 - Graham/ Greenlee	12	16	516	20.00
CM-6 - LaPaz/Yuma	15	15	583	20.00
CM-7 - Maricopa	11	21	915	15.00
CM-8 - Mohave	20	33	1,411	25.00
CM-9 - Navajo	17	5	232	20.00
CM-10 - Pima/ Santa Cruz	14	36	1,487	20.00
CM-11 - Pinal	9	30	1,024	15.00
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## OPEN-FILE REPORTS

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**OFR90-5 Publications of the Department of Mines and Mineral Resources from 1939 to 1990.** by D.R. Bain, 1990. 15 p. \$2.50 \*

**OFR92-10 Copper Oxide Resources,** by N.J. Niemuth and K.A. Phillips, 1992. A listing of over 800 Arizona deposits that contain copper oxide. 18 p. \$5.00

**OFR93-12 Economic Geology of the Sierra Estrella, Maricopa and Pinal Counties, Arizona,** by E.B. Melchiorre, 1993. Includes site descriptions of metallic and nonmetallic resources. 29 p. \$2.50

**OFR95-13 Listing of the Grover Heinrichs File Collection,** compiled by N.J. Niemuth, 1995. 31 p. \$3.00

**OFR01-17 Arizona Copper Reserves,** Reserve and ownership information for 80 major copper properties. The information is continually updated. 85 p. \$10.00

**OFR02-18 The Crushed Stone Industry Grows Up, A History of Mineral Material Trespass on Public Lands in Central Arizona,** by W. Scott Donaldson, 2002. 21 p. \$2.50

**OFR02-20 Arizona Mining Scams and Unassayable Ore Projects of the Late 20th Century,** by W. Scott Donaldson, 2002. 28 p. \$3.00 \*

**OFR04-21 Publications of the Department of Mines and Mineral Resources From 1990 to 2004,** by D.R. Bain, 2004. 7 p. \$2.50 \*

**OFR07-24 Arizona's Metallic Resources – Trends and Opportunities,** by N.J. Niemuth, 2007. 22 p. Free\*

**OFR07-25 Checklist of Arizona Minerals,** by Raymond W. Grant, 2007 Lists all 861 Arizona minerals, including the 61 new ones added since the third edition of *Mineralogy of Arizona*. 57 p. \$15.00

**OFR08-26 Arizona's Metallic Resources – Trends and Opportunities,** by N.J. Niemuth, 2008. 22 p. Free\*

## CIRCULARS

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**C59 Mining Scams,** by M.N. Greeley, 1995. Discusses common features of mining scams and ways to avoid being a victim of one. \*

**C63 Reference Material Listing,** 1996. Library holdings on mines, mining, and recovery technology. \*

**C91 Assayers and Assay Offices in Arizona,** 2001. List of commercial assay laboratories in Arizona with registered assayers. Includes information on the history of assaying and the assaying process. \*

**C103 A Historic Review of Mercury Mining in the Phoenix Mountains, Maricopa County,** by D.R. Bain, November, 2003. \*

**C115 Mining Claim Forms,** 2006. Includes Location Notices for lode and placer claims, Claim Map, Affidavit of Performance of Annual Work, Notice of Non-liability for Labor and Materials Furnished, Notice of Intent to

Hold Mining Claims, and Attachment for Additional Claims. \*

**C119 Listing of U.S. Bureau of Mines Mineral Land Assessment Open File Reports in Arizona,** 2006, A listing of all MLA Open File Reports conducted in Arizona. \*

**C120 State Agencies Concerned with Mining & Mineral Resources in Arizona,** 2007. Contains names, addresses, and pertinent people at state agencies concerned with mines and mineral resources.\*

**C121 Federal Agencies Concerned with Mining in Arizona,** 2007. Contains addresses of Bureau of Land Management, Forest Service offices, and other Federal agencies. \*

**C122 County Agencies Concerned with Mining & Mineral Resources in Arizona,** 2007. Includes a listing of addresses, phone numbers, and websites. \*

**C123 Arizona Gem Shows, 2007-2008.** Includes date, location, sponsoring group, contact person. \*

**C125 Arizona Mining Update, 2006,** N.J. Niemuth. A review of mining activity in Arizona. Describes copper, gemstone, industrial mineral, and coal mines as well as mineral exploration and government news. \*

**C126 Guide to Online Land Status Records.** A guide to the online availability of ownership records for mining claims and other lands. Includes records of the Bureau of Land Management, State Land Department, and County Recorder Offices in Arizona. \*

## MAPS

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All maps are shipped folded. Contact the Department to special order rolled maps or a different scale or media.

**MM-17 Metallogenic Provinces of Arizona,** by P.F. O'Hara, N. J. Niemuth, and G. Ryberg, 1989. Scale 1:1,000,000, Preliminary edition showing 49 metallogenic provinces in Arizona. Blackline \$2.50

**MO2-2 Map of Arizona Copper Resources,** by N.J. Niemuth, 2002. Scale 1:3,000,000. Provides names and locations of principal deposits. Order OFR 1-17 for details of the deposits. \$.50 \*

**MO7-3 Active Mines Map – 2007,** cartography by S. Eastman. Scale 1:1,000,000. Shows all 402 active mines in Arizona, including sand and gravel. Color. \$10.00

## NON-ADMMR PUBLICATIONS

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**Principal Deposits of Strategic and Critical Minerals in Arizona,** 1992. Published by the U.S. Bureau of Mines. A comprehensive review of Arizona's mineral commodities and infrastructure. 334 p. \$8.00

**Arizona Mining Summit – Guide to Permitting Mining Operations in Arizona,** 1999. 157 p. \*

In addition to the Department of Mines and Mineral Resources, many other Arizona agencies and organizations cooperate to encourage and support Arizona's mining industry. The Department wishes to thank the following organizations for providing information for PDAC 2008.



**Arizona Department of  
Commerce**



**Arizona Geological Society**



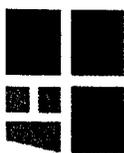
**Arizona Geological Survey**



**Arizona Mining Association**



**BLM - Arizona**



**State Land Department -  
Minerals Section**



**University of Arizona,  
Mining & Geological Engineering**

# THE IMPACT OF THE COPPER INDUSTRY ON THE ARIZONA ECONOMY

- ◆ In 2006, the Arizona copper industry had a combined direct and indirect impact on the Arizona economy of:

**\$4.719 Billion**

- ◆ including combined direct and indirect contributions of:

<b>\$1.404 Billion</b>	in personal income, equivalent to 28,600 jobs for Arizonans
<b>\$2.990 Billion</b>	in business income, and
<b>\$325 Million</b>	in state and local government revenues

- ◆ as a result of the circulation (and multiplication) of the copper industry's total direct impact of

**\$2.120 Billion**

- ◆ that included direct payments of:

<b>\$141.305 Million</b>	to the State and its local governments in taxes and fees,
<b>\$1,439.740 Million</b>	to other Arizona businesses for products and services, and
<b>\$538.3567 Million</b>	in personal income for Arizonans, including wages and salaries for the industry's
<b>8,200</b>	employees

- ◆ who labored to produce:

**787,236** tons of copper and other minerals with a total value of

**\$5.628 Billion**

(59% more than in 2005)

Compiled by WEAC for the



Arizona Mining Association  
5150 N. 16th St., Ste. B134  
Phoenix, AZ 85016  
602-266-4416 Fax: 602-230-8413  
[www.azcu.org](http://www.azcu.org)

# Exploration Permits and Mining Leases on Arizona State Trust Land

The Minerals Section of the Arizona State Land Department (ASLD) is responsible for mining/mineral activities on State Trust land. Its primary obligation is to maximize revenues for the Trust from the disposition and management of mineral commodities while considering the long-term best interest of the Trust. Arizona's public schools are the primary State Trust beneficiary.

Mineral commodities are classified into three separate categories:

**Hard Rock Minerals** refer primarily to *base and precious metals* as well as *industrial minerals* that are unique and distinct.

**Common Variety Minerals**, also referred to as salable minerals or mineral materials, include *construction and landscaping materials* (cinders, sand, gravel, boulders, loose rock and common clay) and *minerals of similar occurrence* commonly used as aggregate, riprap, ballast, borrow or fill.

**Energy Minerals** (also leaseable) refer primarily to *oil, gas, and geothermal resources*.

The right to explore for and produce mineral commodities on State Trust land is accomplished by obtaining one of the following mineral-related permit / leases:

- Mineral Exploration Permit
- Mineral Lease
- Common Variety Mineral Lease / Sale
- Oil and Gas Lease

Details for each mineral category can be obtained from ASLD's Minerals Section.

## Mineral Exploration Permits

A mineral exploration permit is permission from ASLD to prospect and explore for minerals on State Trust land. Exploration is any activity conducted for the purpose of determining the existence of a valuable mineral deposit, such as: geologic mapping, drilling, geochemical sampling, and geophysical surveys.

Prior to exploration, the Plan of Operations *must* be approved.

- The permitting process for an exploration permit takes a minimum of sixty (60) days.
- If the application is approved, the initial rent is \$2 per acre. If renewed, no additional rents are due for the second year. Rents are set at \$1 per acre for years 3 thru 5.
- Work expenditure requirements are:
  - \$10 per acre for years 1-2; and
  - \$20 per acre for years 3-5.

The permit is valid for one year from the due date of the rental and bond. If renewal requirements are met, the permit can be renewed annually for up to five years. If discovery of a valuable mineral deposit is made, the permittee must apply for a mineral lease before actual mining activities can begin.

**External permitting requirements can greatly impact application processing time.**

**A Pre-Application Conference with ASLD is recommended for the following leases.**

## Hard Rock Mineral Leases

A mineral lease permits the mining of minerals discovered under the exploration permit it.

- The approval process takes a minimum of six (6) months.
- The mineral lease is issued for a term of twenty (20) years. Leases may be renewed for an additional term.
- Both *rents* and *royalties* are determined by appraisal. Royalties may be based on:
  - 1) a fixed rate subject to annual adjustment; or
  - 2) a sliding-scale rate which is linked to a commodity index price and the operation's breakeven price. There is a statutory minimum royalty rate of 2% of gross value.

## Common Variety Mineral Lease

This agreement is for the purchase, mining and processing of common variety minerals (sand and gravel, and other construction and landscape materials). Statutes require these mineral commodities to be sold at public auction. It is the auction process which determines the market value (royalty rate) of the commodity. Statutes require that the sale be advertised for ten (10) weeks prior to the auction. Advertising costs are paid by the applicant. However, should the applicant not be the successful bidder, advertising costs and certain other costs are reimbursable.

- The application approval process takes a minimum of six (6) months.
- An agreement is issued initially for a ten (10) year term with provisions to extend up to a maximum of twenty (20) years.
- *Rents* are based on a percentage of the appraised surface value.
- *Royalty rates* are determined at public auction. A minimum annual production guarantee is assessed for each agreement.

**Recreational mining or mineral collecting on State Trust land is prohibited**

## Oil and Gas Leases

The oil and gas lease is for the exploration and/or production of oil and gas resources. *All drilling must be approved by the Oil and Gas Commission* (through the Arizona Geological Survey) as well as the ASLD.

The permitting process for an oil and gas lease takes a minimum of one (1) month.

- Leases are issued for a primary term of 5 years. A secondary term of 5-years may be requested prior to the expiration of the first term for a maximum of ten (10) years, or so long thereafter as production continues.
- Annual rents are payable in advance at \$1 per acre for the primary term, and \$2 per acre if extended for a secondary term.
- Royalties: 12.5% of the value for all products sold or removed from the lease.

## Applicable State Laws

### ARIZONA REVISED STATUTES

Title 27: Minerals, Oil and Gas

Title 37: Public Lands

Title 41: State Government

A.R.S. § 41-844 requires parties in charge of ground disturbing projects on State [Trust] land to promptly report the discovery of any archaeological, paleontological or historic site or object to the director of the Arizona State Museum.

### ARIZONA ADMINISTRATIVE CODE

Title 12: Natural Resources, Chapter 5

## General Requirements

### APPLICATION FEE

There is a non-refundable filing fee of \$100 per application.

### OTHER FEES

Rental fees are required on all agreements.

Royalties are paid on all recovered mineral products.

Additional fees, such as appraisal or administrative fees, may also be required.

### REQUIRED MAPS

A USGS topographic map showing lease boundaries, access routes, roads, utilities, etc., must be submitted with the application. Other detailed maps, related to your operation will be required in a Mineral Development Report.

### MINERAL DEVELOPMENT REPORT (MDR)

All mining-related operations require a detailed MDR which includes: 1) geologic assessment, 2) economic feasibility, 3) environmental assessment, 4) mine operations plan, and 5) reclamation and closure plans. Detailed requirements for the MDR are available upon request.

### OTHER NECESSARY DOCUMENTS

Exploration permits require a plan of operations. Aerial photos, contour maps and registered surveys may also be required. Surveys of cultural resources, native plants, wildlife, and endangered species are required components.

### RECLAMATION BOND

The *minimum* bond required is \$3,000. The actual bond amount is based upon the type of operation and the degree of disturbance.

### INDEMNITY INSURANCE

Indemnity insurance will be required for most operations.

### OTHER PERMITTING REQUIREMENTS

The applicant is responsible for determining permitting requirements from other regulatory agencies *and* to be in compliance.

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### For More Information:

Arizona State Land Department  
MINERALS SECTION  
1616 West Adams Street  
Phoenix, Arizona 85007  
602-542-4628  
fax 602-542-3507  
[www.land.state.az.us](http://www.land.state.az.us)

### Other Useful Contacts:

Arizona Department of Mines & Mineral Resources  
602-771-1600  
[www.mines.az.gov](http://www.mines.az.gov)

Arizona Geological Survey  
520-770-3500  
[www.azgs.az.gov](http://www.azgs.az.gov)

Arizona Mine Inspector  
602-542-5971  
[www.asmi.az.gov](http://www.asmi.az.gov)

Arizona State Museum  
520-621-4011  
[www.statemuseum.arizona.edu](http://www.statemuseum.arizona.edu)

Bureau of Land Management  
Land and Mineral Records  
602-417-9200  
[www.blm.gov](http://www.blm.gov)

U.S. Geological Survey  
Western Mineral Resources Tucson Office  
520-670-5544  
<http://minerals.usgs.gov/west/tucson.htm>

**ARIZONA GEOLOGICAL SURVEY**  
**Partial list of Mineral and Energy Resource Publications**

**Bulletin 180**—Geology and Mineral Resources of Arizona, by U.S. Geological Survey, Arizona Bureau of Mines, and U.S. Bureau of Reclamation, 1969 (reprinted 1989), 467 p. [Photocopy only]....\$22.00

**Metallic Mineral Resources**

**Bulletin 194**—Metallic Mineral Districts and Production in Arizona, by Stanley B. Keith, D.E. Gest, Ed DeWitt, Netta Woode Toll, and B.A. Everson, 1983, 58 p., scale 1:1,000,000, [includes Map 18]....\$10.00

**Map 18**—Metallic Mineral Districts of Arizona, by Stanley B. Keith, D.E. Gest, and Ed DeWitt, 1983, scale 1:1,000,000. [also included in Bulletin 194]....\$7.00

**Digital Information Series 3**—Database Files describing Mineralized Sites in the State of Arizona, v. 1.0, Data structure and editing by S.M. Richard, 1996, 3 diskettes, 22 p.. DBase and Access 95 formats. Can be used in a GIS application.....\$10.00

**Digital Information Series 21**—Database for Mineral Districts in the State of Arizona, S.M. Richard, editor, 2002, 1 CD-ROM. MS Access database, ESRI shapefiles.....\$30.00

**Indexes of Mining Properties**

**Bulletin 187**—Index of Mining Properties in Cochise County, Arizona, by Stanton B. Keith, 1973, 98 p....\$5.00

**Bulletin 189**—Index of Mining Properties in Pima County, Arizona, by Stanton B. Keith, 1974, 156 p....\$6.00

**Bulletin 191**—Index of Mining Properties in Santa Cruz County, Arizona, by Stanton B. Keith, 1975 (reprinted 1990), 94 p....\$15.00

**Bulletin 192**—Index of Mining Properties in Yuma County, Arizona [includes La Paz County], by Stanton B. Keith, 1978, 185 p....\$6.00

**Bulletin 196**—Mine Index for Metallic Mineral Districts of Arizona, by J.W. Welty, S.J. Reynolds, Stanley B. Keith, D.E. Gest, R.A. Trapp, and Ed DeWitt, 1985, 92 p.....\$7.00

**Bibliographies**

**Circular 24**—Bibliography for Metallic Mineral Districts in Cochise, Graham, and Greenlee Counties, Arizona, by Lorraine Schnabel and J.W. Welty, 1986, 38 p....\$6.00

**Circular 25**—Bibliography for Metallic Mineral Districts in La Paz, Mohave, and Yuma Counties, Arizona, by Lorraine Schnabel and J.W. Welty, 1986, 45 p.....\$6.00

**Circular 26**—Bibliography for Metallic Mineral Districts in Pima and Santa Cruz Counties, Arizona, by Lorraine Schnabel, J.W. Welty, R.A. Trapp, and S.J. Reynolds, 1986, 44 p.....\$6.00

**Circular 27**—Bibliography for Metallic Mineral Districts in Gila, Maricopa, Pinal, and Yavapai Counties, Arizona, by J.W. Welty, Ed DeWitt, and Lorraine Schnabel, 1989, 81 p.....\$11.00

**Circular 28**—Bibliography for Metallic Mineral Districts in Apache, Coconino, and Navajo Counties, Arizona, by J.W. Welty and W.L. Chenoweth, 1989, 47 p.....\$9.00

**OFR-88-22**—Additions to Bibliographies for Metallic Mineral Districts in Cochise, Graham, Greenlee, La Paz, Mohave, Pima, Santa Cruz, and Yuma Counties, Arizona, by J.W. Welty, 1988, 32 p.....\$5.25

**Industrial Minerals**

**Circular 30**—Arizona has Salt!, by S.L. Rauzi, 2001, 40 p.....\$10.00

**Special Publication 4**—Proceedings of the 21st Forum on the Geology of Industrial Minerals, edited by H.W. Peirce, 1987, 134 p.....\$12.00

### Energy Resources

- Bulletin 182**—Coal, Oil, Natural Gas, Helium, and Uranium in Arizona, by H.W. Peirce, Stanton B. Keith, and J.C. Wilt, 1970, 289 p., 15 sheets....\$10.00
- Circular 29**—Arizona has Oil & Gas Potential!, by S.L. Rauzi, 2001, 40 p.....\$10.00
- Map 15-2**—Geothermal Resources of Arizona, by J.C. Witcher, Claudia Stone, and W.R. Hahman, Sr., 1982, scale 1:500,000.....\$5.00

### Geologic Maps

- Map 17**—Index of Published Geologic Maps of Arizona, 1903-1982, by R.B. Scarborough and M.L. Coney, 1982, scale 1:1,000,000, 6 sheets. [See also M-31] All 6 sheets....\$8.00
- Map 31**—Index of Published Geologic Maps of Arizona: 1982 to mid-1993, by R.C. Harris, R.A. Trapp, T.G. McGarvin, and J.E. Spencer, 1994, 45 p., scale 1:1,000,000, 3 sheets. Text and sheets....\$8.00
- Map 33**—Arizona Geologic Highway Map, 1998, scale 1:1,000,000. Available as a folded map only....\$10.00
- Map 35**—Geologic Map of Arizona, by S.M. Richard, S.J. Reynolds, J.E. Spencer, and P.A. Pearthree, compilers, 2000, scale 1:1,000,000. (For rolled map, add \$1.00 for mailing tube. Rolled maps cannot be delivered to P.O. Box)....\$5.00
- Digital Geologic Map 01**—Digital geologic map and cross sections of the Clifton-Morenci area, Greenlee County, Arizona, v. 1.0, compiled by C.A. Ferguson and M.S. Enders, 2000, 1 CD-ROM....\$15.00  
Or purchase as three color, paper maps, scale 1:24,000 (order as **DGM-01, S**)....\$35.50
- Digital Geologic Map 31**—Geologic Map of the Twin Buttes 7.5' Quadrangle, Pima County, Arizona, v. 1.0, by S.M. Richard, J.E. Spencer, Ann Youberg, and B.J. Johnson, 2003, 1 CD-ROM.... \$15.00  
Or purchase as one color map, scale 1:24,000 (order as **DGM-31, S**)....\$18.00

### PUBLICATION ORDERING INFORMATION

You may purchase publications at the AZGS office or by mail. Address mail orders to AZGS Publications, 416 W. Congress St., Suite 100, Tucson, AZ 85701. See [www.azgs.az.gov](http://www.azgs.az.gov) for additional information, or call 520 770-3500 if you have questions. Orders are shipped by UPS, which requires a street address for delivery. All mail orders must be prepaid by a check or money order payable in U.S. dollars to the Arizona Geological Survey. Master Card or Visa are accepted for orders over \$10.00. Please include card number, expiration date, and signature on order form. Do not send cash. Arizona residents must add 8.1% sales tax to the order. Order by publication number and add the following shipping and handling charges to your order:

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	\$50.01 to	\$100.00,	add	\$13.00
	\$100.01 to	\$200.00,	add	\$17.00
More than	\$200.01			call
Other countries, request price quotation				
Shipping and handling charges include insurance.				
For rolled maps, add \$1.00 for a mailing tube.				

## **Arizona Geological Society**

P.O. Box 40952, Tucson, AZ 85717

520-663-5295

**[www.arizonageologicalsociety.org](http://www.arizonageologicalsociety.org)**



### **Purpose of the Society**

is the promotion and encouragement of interest in the science of geology of the state of Arizona. To this end the Society holds monthly meetings, sponsors field trips, and publishes field trip guides and the Digest at irregular intervals. The Society has produced a distinguished publication series, see listing below. AGS was founded in 1948.

### **Membership**

in the Society is open to all who are professionally interested in the geology of the State of Arizona.

Dues: \$20 for 1-year membership  
\$35 for 2-year membership,  
\$50 for 3-year membership,  
full-time student - free

## **Arizona Geological Society Publications - partial listing**

The Arizona Geological Society's publications are sold over the counter and by mail through the Arizona Geological Survey. For shipping costs see the order form on the society's website or contact the Survey at 416 W. Congress #100, Tucson, AZ 85701, Phone 520-770-3500

**GEOLOGIC HIGHWAY MAP OF ARIZONA**, edited by R.J. Kamilli and S.M. Richard, scale 1:1,000,000, 1 sheet, 26" x 48", folded to 5" x 9", text and maps both sides, 1998, \$10.00

**Digest 20: PORPHYRY COPPER DEPOSITS OF THE AMERICAN CORDILLERA**, edited by F.W. Pierce and J.G. Bolm. 656p., 43 papers, hardbound, 1995, \$75.00

**Digest 19: PROTEROZOIC GEOLOGY AND ORE DEPOSITS OF ARIZONA**, edited by K. E. Karlstrom. 332 p., 25 papers, softbound, 1991, \$35.00

**Digest 18: MESOZOIC ROCKS OF S. ARIZONA AND ADJACENT AREAS**, edited by W. R. Dickinson & M. A. Klute. 400 p., 28 papers, softbound, 1987, \$ 17.00

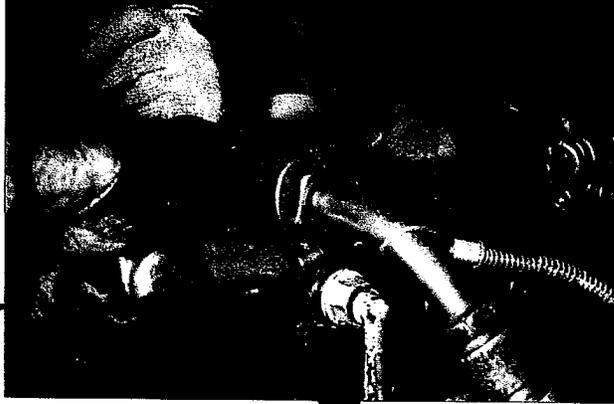
**Digest 17: GEOLOGIC EVOLUTION OF ARIZONA**, edited by J. P. Jenney & S. J. Reynolds. 866 p., 35 papers, hardbound, 1989, 1 plate - Arizona Geologic Map 1988 scale 1:1MM by Reynolds. \$60.00  
Includes chapters on Precambrian, Laramide, and Mid Tertiary metalliferous ore deposits, uranium, petroleum, and industrial minerals.

**Digest 16: FRONTIERS IN GEOLOGY AND ORE DEPOSITSO F ARIZONA AND THE SOUTHWEST**, edited by B. Beatty & P.A.K. Wilkinson. 555 p., 72 papers, softbound, 1986, \$25.00

**Digest 15: GOLD AND SILVER DEPOSITS OF THE BASIN AND RANGE PROVINCE, WESTERN U.S.** edited by Joe Wilkins, Jr.. 233 p., 19 papers, hardbound, 1984, \$17.00

**Digest 14: RELATIONS OF TECTONICS TO ORE DEPOSITS IN THE SOUTHERN CORDILLERA**, edited by W. R. Dickinson & W. D. Payne. 288 p., 19 papers, softbound, 1981, \$17.00

**Digest 10: TECTONICS OF ARIZONA**, edited by J. C. Wilt & J. P. Jenney. 430 p., 19 papers, 4 maps, softbound, 1976, \$14.00



# WE WANT YOUR BEST



## The Lowell Master of Engineering in Mineral Resources

The global nature and fast pace of the mining industry can make it difficult to return to a college campus for graduate courses.

The Lowell Master of Engineering in Mineral Resources is a distance degree that provides continuing education for the global minerals industry. Courses are taught by university professors, industry professionals, and senior executives of major companies.

The Master of Engineering in Mineral Resources is a program for mineral resource professionals advancing to management positions and for those from other disciplines who are entering the mineral resources industry and need professional career preparation specific to the industry.

Nominations and applications are being accepted for the fall 2008 semester. The application deadline is June 1, 2008.

# Emphasis Areas

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## Course Topics Include:

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Block Cave Mine Design  
Disease and Illness in Mining  
Environmental and Occupational Health  
Underground Construction Geomechanics  
Mechanics of Failure in Rock  
Surface Chemistry of Flotation  
Hydrometallurgy  
Engineering Sustainable Development  
Environmental Management and Mine Reclamation

## Lowell MEng Fast Facts

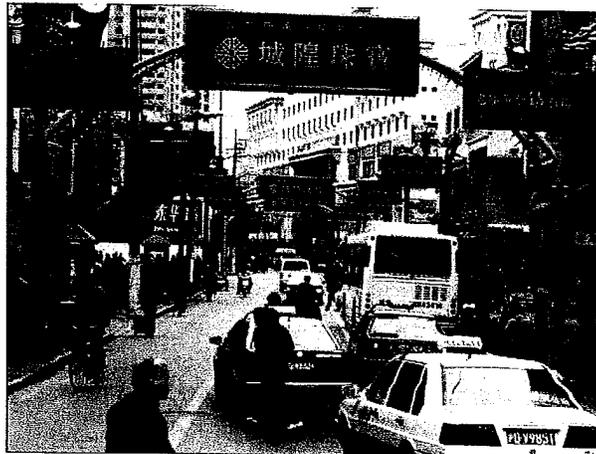
Students employed by a company with a business presence in Arizona pay in-state tuition (corporate rate). Learn more at:

[www.oneflexibledegree.com](http://www.oneflexibledegree.com)

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\*Some emphasis areas will require differential equations, structural geology, mineralogy/petrology, thermodynamics, surface chemistry.

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<http://grad.arizona.edu>

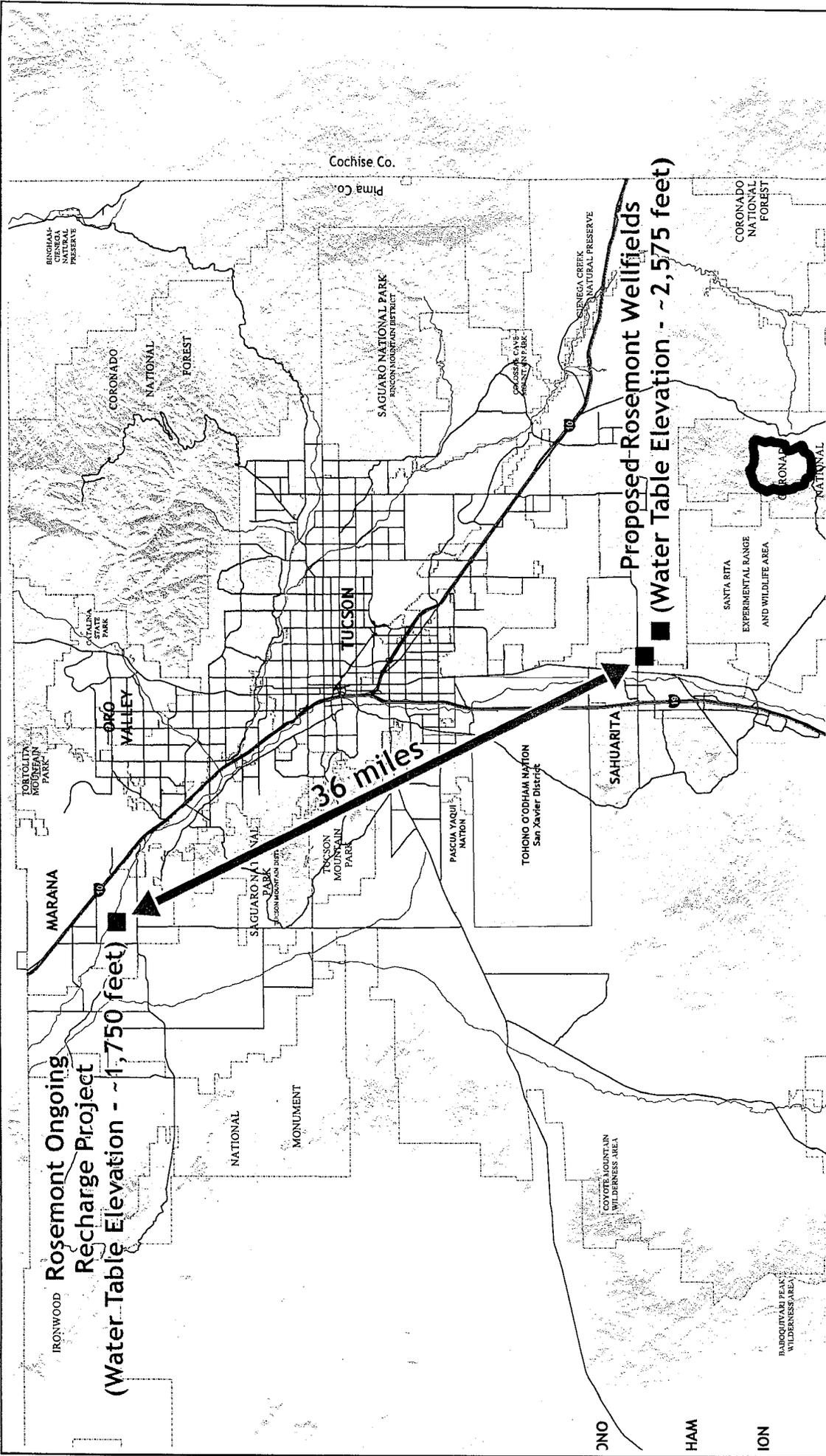
Complete the Master of Engineering Application at:  
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OF ARIZONA.



**Rosemont Ongoing Recharge Project**  
 (Water Table Elevation - ~1,750 feet)

**Proposed Rosemont Wellfields**  
 (Water Table Elevation - ~2,575 feet)

36 miles

# Rosemont Recharge and Pumping

- RECHARGE FEATURES**
- Proposed Wellfield
  - Recharge Project
  - Proposed Rosemont Mine Boundary

- OTHER FEATURES**
- ~ Major Stream or Wash
  - ▭ Tohono O'odham Nation - San Xavier District Incorporated Area
  - ▭ Avra Hydrogeologic Basin
  - ▭ Tucson Hydrogeologic Basin
  - ▭ Jurisdictional Boundary

Scale 1:120,000

May 12, 2008

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**PIMA COUNTY Geographic Information Services**

Pima County Geographic Information Services  
 201 North Stone Avenue - 9th Floor  
 Tucson, Arizona PAM 10107A-109  
<http://www.doc.pima.gov>

Water Table Elevation Source: ADWR 1994

Pima County Index Map

Index Map Scale 1:1,750,000



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# MEMORANDUM

## Water Resources

### Regional Flood Control District

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DATE: December 14, 2006

TO: Nicole Fyffe  
Executive Assistant to the County Administrator

FROM: Julia Fonseca *Julia*  
Environmental Planning Mgr.

SUBJECT: **Maest-Kuipers Report on Predictions Comparison**

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I am forwarding you this summary of the findings of a recent study released by Earthworks, and conducted by Ann Maest and Jim Kuipers.

The study compared pre- and post-mining water quality for major bedrock mines which went through the environmental impact analysis under the National Environmental Policy Act. In summary, 100 percent of the mines studied predicted compliance with water quality standards before operations began. Afterwards, 76 percent exceeded water quality standards due to mining. Mitigation measures predicted to prevent water quality exceedances failed at 64 percent of the mines studied in detail.

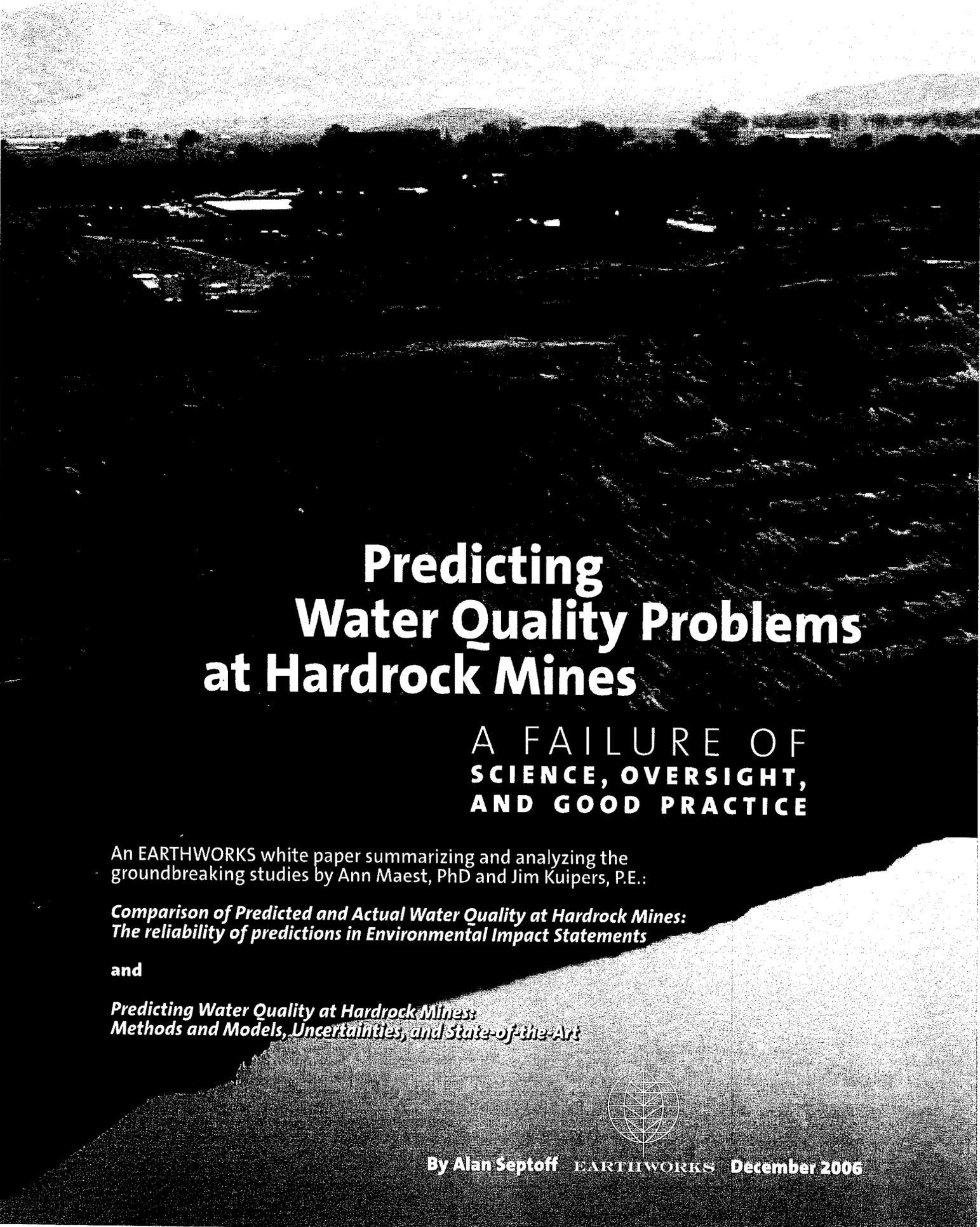
The study identified a number of problems:

1. No independent reviewers were used, and the federal agencies do not often have the expertise to do critical reviews.
2. None of the water quality predictions made in the impact statements were revisited (until this study).
3. The regulatory agencies do not have a practice of revisiting the outcomes to see where failures are occurring, or understand why.
4. The geology and hydrology of the sites are not adequately understood before permitting and during operations.
5. The adequacy of financial assurances based on the outcomes is never revisited.

Some of the solutions proposed in the report are listed below. All of them are applicable to the State Land Department process as well as the federal process.

1. Improve on-line data access for the public.
2. Review original predictions as water quality develops during mining.
3. Consult past predictions at other mines.
4. Require improved characterization of mine sites before and during operations, especially about potential to encounter surface water/groundwater.
5. More research on effectiveness of mine water quality mitigation.
6. Change procedure for selecting consultants to avoid the present conflict of interest.
7. Increase government expertise.

c: Suzanne Shields, P.E. Director  
Thomas Helfrich, Division Manager



# Predicting Water Quality Problems at Hardrock Mines

A FAILURE OF  
SCIENCE, OVERSIGHT,  
AND GOOD PRACTICE

An EARTHWORKS white paper summarizing and analyzing the groundbreaking studies by Ann Maest, PhD and Jim Kuipers, P.E.:

*Comparison of Predicted and Actual Water Quality at Hardrock Mines:  
The reliability of predictions in Environmental Impact Statements*

and

*Predicting Water Quality at Hardrock Mines:  
Methods and Models, Uncertainties, and State-of-the-Art*



By Alan Septoff EARTHWORKS December 2006

## Introduction

### A failure of science, oversight and good practice

This paper is a summary, written for the layperson, of the findings of a two-year research study on the accuracy of water quality predictions at hardrock mines. The study, conducted by Jim Kuipers and Ann Maest<sup>1</sup>, brings to light a decades-long failure by government regulators, industry, and consultants to recognize and correct deficient procedures and methods for predicting contamination of water at hardrock mines.

Kuipers and Maest have discovered that, in practice, there is a failure to compare predictions made before the mines are permitted with the actual results. The predictive modeling results are not adjusted to account for real-life failures—this, despite the fact that at the vast majority of mines, problems were worse than predicted. Establishment of credibility in modeling requires that the predictions be tested, and then the models adjusted based on the results. This process appears broken when it comes to predicting the impact of mines on water quality for mine permits.

To permit mines, federal law<sup>2</sup> requires regulators to apply scientific approaches to predict the environmental impacts of the mine proposal – including surface water and groundwater quality impacts. The accuracy of these water quality predictions is of significant public concern. Mining's impacts on water quality may affect municipal, agricultural, and rural water supplies; important commercial, subsistence and sports fisheries; wildlife populations; tourism; and recreation. One of the reports from the study, *Comparison of Predicted and Actual Water Quality at Hardrock Mines (Comparison Report)*, asks a basic question that government regulators, industry officials and consultants should have asked long ago:

#### Do predicted water quality impacts match reality?

The answer, in short, is **no**. The *Comparison Report* reveals:

- 100 percent of mines predicted compliance with water quality standards before operations began (assuming pre-operations water quality was in compliance).
- 76 percent of mines studied in detail exceeded water quality standards due to mining activity.
- Mitigation<sup>3</sup> measures predicted to prevent water quality exceedances<sup>4</sup> failed at 64 percent of the mines studied in detail.

Along with more analysis of this question, the *Comparison Report* and the companion report on methods and models used to predict water quality (*Methods and Models Report*), also seek to answer the necessary follow-up questions:

- In cases where predicted water quality impacts fail to match reality, why do they fail?

- Do certain types of mines fail more often than others?
- What can be done to address current failures and prevent future failures?

The Kuipers-Maest reports were prepared for a professional audience. The purpose of this paper is to translate and summarize the main findings of their research (for the layperson and the interested public), and to offer common sense recommendations based on those findings with an eye toward protecting natural resources and public health.

## The Context

### Why this research was necessary

#### The Environmental and Public Costs of Faulty Predictions

The failure to accurately predict and manage water quality impacts can result in significant negative impacts on clean water and steep taxpayer liabilities for the costs of cleanup. Consider one often-cited example — the Summitville gold mine in Colorado. Water pollution at this mine has cost American taxpayers more than \$200 million in cleanup costs. The majority of that money has been spent mitigating acid drainage and cyanide releases that were not predicted during the permitting process. When pollution spilled from a containment pond, 18 miles of the Alamosa River were effectively killed – impacting not only the aquatic life in the river, but also the adjacent farms and ranches that relied upon the Alamosa for irrigation and livestock watering.

While it may be argued that Summitville is one of the worst-case examples, problems abound. According to the U.S. EPA's Abandoned Mine Land Team, the cost of mine cleanup at sites on the National Priorities List (i.e., Superfund sites, like Summitville) in the United States is \$20 billion – almost 3 times the EPA's FY 2007 budget request. Long term water treatment and management is often the single most significant cost associated with mine cleanup.

In fact, there is an increasing number of mine sites throughout the U.S. that will require water treatment in *perpetuity*. In the arid west, these types of long-term impacts place a tremendous burden on downstream communities who must deal with the consequences of failed predictions. For example, government regulators have determined that the Zortman Landusky mine, located near the Fort Belknap Reservation in Montana, will continue to generate acid mine drainage for thousands of years. As a result, the Fort Belknap Tribes are faced with a continual threat to important tribal water resources, and the state of Montana will be spending tens of millions in public funds for long-term water treatment.<sup>5</sup>

In order to ensure clean water and protect taxpayers from liability for cleanup costs it is important to understand the frequency and magnitude of failures in predicting water quality impacts. Consider that at most major mines, operators are required to post financial assurances prior to operating. This is the good news. These assurances are supposed to guarantee that, should the mine operator go bankrupt, the mine site will be reclaimed at no cost to the taxpayer. However, the bad news is that these financial assurances are based upon expected reclamation costs and expected reclamation costs are based in large part upon water quality predictions.

Previous research by Jim Kuipers demonstrates that taxpayers are potentially liable for up to \$20.4 billion<sup>6</sup> in financial assurance shortfalls at existing mine sites (in addition to the \$20 billion for Superfund sites) – due in large part to inaccurate water quality predictions.

### **A Growing Problem**

Without correction, the environmental and financial impacts of faulty predictions could grow. Recent increases in metals prices have triggered an increase in the number of new mines being proposed in the United States. According to the Bureau of Land Management, new mining claims filed in 2006 are on track to more than quadruple since metals prices began their precipitous rise in 2002.

In the United States alone there are approximately 180 large hardrock mines – in nearly all regions of the country – that are in various stages of permitting, development, operation or reclamation and closure. In order to better protect important water resources and reduce future economic liability, improvements must be made in the prediction and prevention of impacts to water quality at these sites. On the positive side, the increase in metals prices has resulted in fewer bankruptcies in the sector—and it is bankruptcies that trigger the use of reclamation bonds for mine site reclamation and water treatment. This may provide regulators and industry officials with a window of opportunity to solve the underlying problems with water quality prediction.

### **Unprecedented Research: the absence of previous studies and the data gap**

When they began their research, the authors expected to incorporate data from some mines where government officials had already completed a comparison of predicted and actual water quality impacts. However, they were unable to find comparisons of water quality predictions and actual water quality impacts of mines.

The authors found that no single repository exists for the Environmental Impact Statements (EISs) currently mandated under federal law. EISs contain the water quality predictions analyzed in the study. In some cases, local

federal offices that processed the studies did not have copies of them. Furthermore, in many cases, the authors were forced to submit Freedom of Information Act requests and pay fees to obtain copies of these studies. Similarly, water quality from mines was inordinately difficult to obtain and in most cases required personal visits to agencies and long hours sorting through paper files.

Taken together, the absence of previously published research and the difficulty in gathering information is evidence of a data gap that surprised the authors and may help explain the previous lack of a comprehensive study of this nature.

It is important to note that the predictions data were available – no matter how difficult to obtain – only because the National Environmental Policy Act (NEPA) requires it. Without NEPA, this study would have been impossible to conduct.

### **A Tool for Many Audiences**

While the research focuses on the underlying scientific and engineering processes that form the basis of water quality predictions, its recommendations are intended for use by many audiences to increase the effectiveness of future mine water quality predictions – directly and indirectly:

- This study should be useful to the scientific and engineering communities for suggesting ways to better characterize risks to water quality and to better apply mitigation methods to minimize or prevent potential impacts.
- The regulatory community can look to these reports, especially *Methods and Models*, for recommendations on how to fundamentally improve the permitting process to ensure a more accurate analysis of potential mining impacts. The inherent uncertainty in water quality predictions and mitigation failures should be conservatively viewed in order to ensure mine permitting decisions that are more protective of human health and the environment. The integrity of the mine permitting process is dependent on the use of accurate methods and models.
- This report can be utilized by the mining industry to improve current practices and more accurately predict consequences and ameliorate potential effects.
- It can be utilized by the insurance and investment industry as a tool to better understand the potential risks and costs associated with mining, and as a basis to re-assess risks at current mines.
- And finally, it can be utilized by the interested public to more effectively advocate for water quality protections in the permitting process and to advocate in the public arena for legislative and regulatory changes that better protect water resources.

## Do Predicted Water Quality Impacts Match Reality?

As indicated above, the answer is usually no — particularly when high risk mines, such as those with close proximity to water resources, are considered.

### Sampled Mines

To arrive at this answer the authors initially reviewed 104 Environmental Impact Statements (EISs) and Environmental Assessments (EAs) for 71 major hardrock mines in the United States.<sup>7</sup> The mines covered all important mineral sectors (gold, silver, copper, platinum group metals, molybdenum, lead, and zinc) and ten mining states (Alaska, Arizona, California, Idaho, Montana, New Mexico, Nevada, South Dakota, Utah, and Wisconsin).

A representative subset of 25 case study mines was then selected to evaluate the accuracy of the water quality predictions. Environmental impact reports for these mines were evaluated for predictions related to surface water, groundwater, and mine drainage quality during and after mining. These predictions were then compared with actual water quality conditions during and after mining.

### Potential & Predicted Water Quality

The authors discovered a two-tiered system for water quality predictions, one-tier of which was based not on sound science, but on unsupported “good faith” projections.

The two tiers of “predictions” made about water quality in environmental assessments are referred to by the authors as “potential” and “predicted” water quality:

- **Potential** water quality is the expected water quality conditions in the absence of mitigation efforts by the operator.
- **Predicted** water quality takes the effect of mitigating measures into account. It is what mine operators forecast actual water quality will be during and after operations.

All the environmental reviews analyzed in the *Comparison Report* predict acceptable water quality after mitigation at mines where water quality standards were met before mining began. If this prediction were not made, the regulatory agency would not be able to approve the mine.

However, inadequate information was provided to demonstrate how the mitigation measures would actually prevent water quality impacts. Therefore, regulators were generally accepting the final water quality predictions on “faith.”

### Major Findings: Chronic Underestimates of Water Quality Problems

#### *Prediction vs. Reality: Overall Water Quality Impacts to Ground and Surface Water*

Of the 25 mines sampled:

- 76% of mines polluted groundwater or surface water severely enough to exceed water quality standards.
- 60% of mines polluted surface water severely enough to exceed water quality standards.
- At least 13 mines (52%) polluted groundwater severely enough to exceed water quality standards.

#### *Predictions vs. Reality: the Failure of Mitigation*

In the cases where water quality standards were exceeded, in some cases the mine proponent anticipated the potential for pollution and prepared mitigation strategies (e.g. a mine waste dump lined with plastic to prevent acid drainage leaching into groundwater). Predictions of the efficacy of mitigation were no more reliable than overall predictions of water quality:

- 73% of mines exceeded surface water quality standards despite predicting that mitigation would result in compliance. The other 4 mines didn't predict the need for mitigation.
- 77% of mines that exceeded groundwater quality standards predicted that mitigation would result in compliance. The other 3 mines didn't predict the need for mitigation.

#### *Predictions vs. Reality: Mines near Water with Elevated Acid Drainage or Contaminant Leaching Potential are High Risk*

Some mine projects are so high risk that water quality exceedances are a near certainty: those mines that are both near groundwater or surface water resources, and possess an elevated potential for acid drainage or contaminant leaching.

- 85% of the mines near surface water with elevated potential for acid drainage or contaminant leaching exceeded water quality standards
- 93% of the mines near groundwater with elevated potential for acid drainage or contaminant leaching exceeded water quality standards.
- Of the sites that did develop acid drainage, 89% predicted that they would not.

#### *Water Quality Pollutants*

Of the 19 mines that exceeded water quality standards, the pollutants that exceeded standards were as follows

- Toxic heavy metals such as lead, mercury, cadmium, copper, nickel or zinc exceeded standards at 63% of mines.

- Arsenic and sulfate exceeded standards at 58% of mines.
- Cyanide exceeded standards at 53% of mines.

## Why Do Predictions Fail?

In order to evaluate water quality impacts during the permitting process, government regulators rely on water quality predictions created by hydrologists and geochemists and mining engineers using computer models and other types of field or laboratory studies. Those predictions are only as good as the science upon which the models/tools are based, and the site characterization information supplied to those models. So when water quality predictions fail to predict water quality for mining operations, they fail for two general reasons:

1. the science of mine water quality prediction is imperfect
2. the science of mine water quality prediction is imperfectly applied at mine sites

### The Imperfect Science of Mine Water Quality Prediction

The complexity of pollutants' interaction and movement in groundwater and surface water systems at mines is difficult to recreate in a model. This is addressed in detail in the companion report by Maest & Kuipers titled *Predicting Water Quality at Hardrock Mines: Methods and Models, Uncertainties, and State-of-the-Art*.

According to *Methods and Models*, factors that complicate the prediction of water quality at mine sites range in scale from small to large. On a small scale, for example, it is not well known how minerals react in complex systems. On a large scale, geology, climate, methods of mining and mineral processing, and mine waste management approaches vary among and within mine operations. These large scale variations limit the degree to which information from one site can be applied to another.

Also, extrapolation from the laboratory to the mine must address complicating factors such as environmental conditions, water and gas transport, differences in particle size, and how these variables affect drainage quality over periods of decades or centuries. However, there is virtually no available field information describing the effect of these variables over extended periods of time. The lack of this field information introduces significant additional uncertainty into predictions.

Just as weather cannot be accurately predicted beyond a certain point because weather models and their inputs are not perfect, the transport of pollutants through complex geological and hydrological systems over the longer term, which can range from five years to tens of thousands of years is similarly difficult to predict.

One of the study's most significant findings, however, is where the practice of predicting weather and the practice of predicting water quality at mining operations part ways. Weather models are consistently reevaluated based on a comparison of predictions with actual weather conditions that occur subsequently.

Not so with the models used for predicting water quality at mining operations. The very fact that the study is unprecedented shows that *professionals who predict mine water quality do not revisit their predictions, and neither do the regulators responsible for ensuring the accuracy of those prediction*. The models used for the predictions cannot be improved if their failures and successes are not evaluated. Where predictions of water quality at mining sites are concerned, the scientific process is broken.

### Imperfect Science, Imperfectly Applied

A mine water quality prediction model can only reach its potential at any individual mine site if that site is correctly characterized (in terms of its hydrology and geochemistry) to the extent possible. According to Maest and Kuipers, that potential is not being reached.

There are two types of characterization failures described in the *Comparison Report*: hydrologic (related to water flow at a mine site) and geochemical (the chemistry, geology and mineralogy of the materials/minerals that comprise the mine site).

The *Comparison Report* documents that six of the 25 case study mines were inadequately characterized hydrologically, and that eleven of the case study sites were inadequately characterized geochemically.

Another example of "imperfect science, imperfectly applied" is the bias of mine water quality predictions made by consultants hired by the prospective mine operator. This problem is implied by the number of site characterization failures, and by the failure to check the results of past mine water quality predictions.

Regulatory agencies, both federal and state, allow the mining company to select and directly pay consultants to predict mine water quality impacts, and to review and comment on (or even reject) those predictions, prior to release to the agency. It is an understatement to say that consultants heavily influence mine water quality predictions.

Unfortunately, given the client/customer relationship between prospective mine operators and their consultants, consultants are rewarded for having favorable predictions. On the other hand a prediction of poor water quality will usually delay a permit, which increases the permitting costs. While exceptions exist, consultants that predict poor water quality often are not rehired. This perverse incentive is contrary to the spirit of unbiased science, and contrary to the public interest.

# Preventing Future Failures (and Addressing Current Failures)

## Recommendations

Both the *Comparisons* and the *Methods and Models Reports* reveal that the prediction of future mine water quality is an uncertain business. And given the difficulty in modeling natural systems, even if all the recommendations included here and in the Kuipers-Maest research are implemented, mine water quality prediction will always be an uncertain business. However, there is considerable room for improvement.

Just as weather prediction has improved over time, so can mine water quality prediction — if regulators and professionals in the sector learn from past predictions and improve characterization efforts.

With that in mind, the following recommendations are intended to help improve mine water quality predictions today and in the future.

### Addressing the Consequences of the Existing Prediction Process

**Assess existing mines.** If the results of the *Comparison Report* are extrapolated to all operating major mines, water quality standards would be exceeded at roughly 75% of all mines in the United States. Regulators should, in a public process, canvass all permitted mines to:

- determine which mines are exceeding water quality standards,
- evaluate how surrounding communities and the environment are being affected, and what cleanup steps are necessary,
- revisit the original predictions, and
- reassess the adequacy of the financial assurances provided by mine operators to guarantee mine cleanup and long-term water treatment.

**Incorporate uncertainty into permitting process.** Regulators should take a suitably precautionary approach to the mine permitting process, and require that mine design, mitigation and financial assurance calculations prepare for reasonable worst-case rather than best-case scenarios.

**Better screen high-risk mines.** Regulators must demonstrate concrete improvement in the accuracy of mine water quality predictions and mitigation efforts. For example, additional regulatory scrutiny should be given to the highest risk proposals such as those mines near water resources and with elevated acid drainage or contaminant leaching potential. In cases where the risks are too high, regulators should not permit mines. It should be noted

that this recommendation is supported by the *Comparison Report* which demonstrates that 93 % of such mines near groundwater, and 85% near surface water, exceeded water quality standards.

Some major mining companies are realizing that the life-cycle costs need to be clearly evaluated, including the costs of *perpetual maintenance and water treatment after mine closure*. While some leaders in the industry are using life-cycle cost estimates, this is still not a uniform industry standard, and regulators ultimately must make the determination for many mine proposals.

**Inform the public about the uncertainty of water quality prediction.** As part of the mine permitting process, regulators should inform the public of the history of the accuracy of mine water quality predictions so they can better determine the risk involved in a mine proposal.

### Improving Future Mine Water Quality Predictions

**Ease access to predictions and results.** Information regarding pre-mining, mining and post-mining water quality should be publicly available online, along with the associated mine water quality predictions made during the permitting process. This will facilitate a more informed mine permit process for regulators and the public.

**Review original predictions as water quality develops during mining.** Mine operations should be regularly assessed to determine if they are departing from mine water quality predictions. This will allow regulators and mine operators to take early action when mine water quality begins to depart from the predicted.

**Consult past predictions at other mines.** When permitting a mine, regulators should be required to seek similar mines, or similar aspects of different mines, and determine what predictions were made and what water quality actually occurred. These mine analogs should be publicly disclosed.

**Require improved characterization of mine sites.** This recommendation is covered in much greater detail in the *Methods and Models Report*. In summary, regulators should require better information about the mine site — before, during and after operations.

**Require more research on the effectiveness of mine water quality mitigation.** The *Comparison Report* found that where predictions of good mine water quality were predicated upon the mine operator using mitigation strategies, mine water quality usually exceeded water quality standards. More research is needed to determine how and why these mitigation efforts fail, and how to improve them.

**Change the procedure for selecting consultants to avoid the present conflict of interests.** Agencies should independently select and pay the consultants to conduct the

studies. This will limit the ability of a mining proponent to influence the outcome of the predictions. The mine proponent can comment on the study, similar to public interest organizations, but they should not be able to exert sufficient influence to bias the outcome.

**Increase government expertise.** Many state and federal agencies are not sufficiently funded to employ staff with the technical expertise to provide appropriate analysis and oversight of the mine permitting process. Increased funding should be incorporated into agency budgets to ensure that technical expertise is available for permit review.

## Endnotes

1. Jim Kuipers, PE, is a mining engineer with Kuipers & Associates in Butte, Montana, and Ann Maest, PhD, is an environmental geochemist with Buka Environmental in Boulder, Colorado.
2. The National Environmental Policy Act requires a science-based review of mine proposals when federally-owned land is affected, or when a federal permit is required (e.g. the Clean Water Act requires a permit when a mine discharges into waters of the United States). Many states have similar laws, based on NEPA, that apply to mine proposals even when federal land is not involved.
3. Mitigation is the effort by a mine operator to prevent or reduce pollution. For example, some mine waste (e.g., tailings impoundments) is underlain by thick plastic to prevent contaminants from moving into nearby water resources.
4. In this paper, an "exceedance" is the presence of a pollutant in concentrations higher than a water quality standard. This is different from a water quality "violation," which is a breach in the terms of a water quality permit. A water quality permit, although based on standards, may allow exceedances under some conditions. A mine operator is legally liable for a water quality violation.
5. Mitchell, Larry D., a staff paper prepared for the Environmental Quality Council, "Zortman and Landusky Mines: HJ 43 Water Quality Impacts, October 2004.
6. Kuipers, J, 2003, Putting a Price on Pollution: Financial Assurance for Mine Reclamation and Closure. This report was funded by Mineral Policy Center.
7. Many mines have multiple EISs or EIAs for different eras of mining.



"John Able" <jable@fs.fed.us>

To "Beverley A Everson" <beverson@fs.fed.us>

Sent by:  
johnable23@gmail.com

cc  
bcc

06/11/2008 03:49 PM

Subject Fwd: Rosemont Mine

Bev, for your Rosemont records. . . .

----- Forwarded message -----

From: **John Able** <jable@fs.fed.us>  
Date: Wed, Jun 11, 2008 at 3:48 PM  
Subject: Re: Rosemont Mine  
To: Bruce Whitehouse <[deadchief@hotmail.com](mailto:deadchief@hotmail.com)>

Chief Whitehouse, thank you for your kind words about the Forest Service. As you are aware, the role of the Forest Service is to faithfully execute the laws of the United States. And while that is sometimes advantageous to some and disadvantageous to others, we try our best to be neutral, objective, and also considerate of every perspective. The proposed Rosemont Copper Project will certainly test the mettle of many of us, whether for or against. Developing the environmental impact statement will obviously be a controversial process. But I'm convinced, based on the the quality and passion of people I've met who are involved on all sides of the issue, that whatever the outcome, the right decision will eventually emerge.

I do hear and understand your concerns, and I hope you've had the opportunity to submit them as a formal comment to be considered in the environmental impact statement process. (If not, please email these and any other comments to [comments-southwestern-coronado@fs.fed.us](mailto:comments-southwestern-coronado@fs.fed.us).) Thanks for taking the time to contact me, and thanks for your service as fire chief!

Please feel free to email or call me anytime with questions or concerns.

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256

On Wed, Jun 11, 2008 at 11:04 AM, Bruce Whitehouse <[deadchief@hotmail.com](mailto:deadchief@hotmail.com)> wrote:

Mr. Able: thanks for showing the courage to let people contact you about this project. The residents of Corona de Tucson, Vail, and Sahaurita are nearly 100% opposed to the destruction of the Santa Ritas. It is hard to believe that the USFS would even consider letting Rosemont use the area near the ranch for a dumping ground for their waste tailings. We have seen the maps, we have heard thier song and dance. After all, the National Forests belong to everybody, not just a few. Either way, I don't think the USFS should be taking the hit on this. The administration in Washington, DC doesn't care one bit about the environment. That is the

bottom line. So we are going to fight this nightmare as long as we can, and if it goes through we will just have to say "we told you so." We are not the enemy, we are just ordinary people who do not want the area destroyed. Sincerely, Bruce Whitehouse Corona resident for 32 years, fire chief of the Corona de Tucson Fire District.

--

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256



mary white  
<keeterbee@aol.com>

06/13/2008 09:36 AM

Please respond to  
keeterbee@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

mary white  
1215 E Spring St  
Tucson, AZ 85719



Brenda Jackson  
<bljstarr@yahoo.com>

06/13/2008 09:36 AM

Please respond to  
bljstarr@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Brenda Jackson  
6035 E Fairmount Street  
Tucson, AZ 85712



Kent Jacobs  
<jacobskent@earthlink.net>

06/13/2008 09:38 AM

Please respond to  
jacobskent@earthlink.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Kent Jacobs  
9121 E. Tanque Verde #105-283  
Tucson, AZ 85749

5207491419



Dennis Paulsen  
<dpaulsen524@yahoo.com>

06/13/2008 09:36 AM

Please respond to  
dpaulsen524@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Dennis Paulsen  
18200 S. Kolb Rd.  
Sahuarita, AZ 85629

5204448627



Gina Fetzer  
<ginasafe@aol.com>

06/13/2008 09:39 AM

Please respond to  
ginasafe@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Gina Fetzer  
6631 W. Placita de las Botas  
Tucson, AZ 85743



Edward and Miriam Kirsten  
<EdwrdKr@aol.com>

06/13/2008 09:43 AM

Please respond to  
EdwrdKr@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

We write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason we urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Edward and Miriam Kirsten  
2720 W. Coyote Moonrise Dr  
Oro Valley, AZ 85755



Margaret Ross  
<rosssail@yahoo.com>

06/13/2008 09:46 AM

Please respond to  
rosssail@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains, which is just a few miles from my home in New Tucson. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen. My husband and I once lived at Roosevelt Lake for five years and remember the well pollution along the road into Globe and the newish clean-up plant installed there. We seriously doubt that mining operations are free of pollution today.

Margaret Ross  
1061 N. Vail View Rd.  
Vail, AZ 85641

520-762-8752



Gabe Scara  
<gabrielscara@hotmail.com>

06/13/2008 09:48 AM

Please respond to  
gabrielscara@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Gabe Scara  
930 n 11th ave  
tucson, AZ 85705



John Donoghue II  
<jdonoghue2@mac.com>

06/13/2008 09:55 AM

Please respond to  
jdonoghue2@mac.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public and other stakeholder agencies. By withholding critical information needed to assess the immediate and cumulative impacts of the proposed action, it seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from oversight agencies such as yours as well as concerned stakeholders. Please do not let this happen.

John Donoghue II  
3016 W Royal Copeland Dr.  
Tucson, AZ 85745



Thomas Elliott  
<trelliot1@mindspring.com>

06/13/2008 09:56 AM

Please respond to  
trelliot1@mindspring.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

The specter of this massive destruction of our resources, essentially in the Tucson community proper, is horrendous. There is no justification for allowing this foreign company to rake huge profits from our community's resources and leave us with an unrepairable blight forever. We can, and must, stop this now.

Thomas Elliott  
6242 E. 20 ST.  
TUCSON, AZ 85711



Leigh Jacobs  
<lmjacobs@email.arizona.edu  
>

06/13/2008 09:58 AM

Please respond to  
lmjacobs@email.arizona.edu

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Leigh Jacobs  
4939 W. Didion Dr.  
Tucson, AZ 85742



Mark Ogonowski  
<mogo@email.arizona.edu>

06/13/2008 10:00 AM

Please respond to  
mogo@email.arizona.edu

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Mark Ogonowski  
736 N. Jerrie Ave.  
Tucson, AZ 85711



"Merlin (Hank) Hinrichs"  
<merlingh@ieudev.net>

06/13/2008 10:02 AM

Please respond to  
merlingh@ieudev.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Merlin (Hank) Hinrichs  
769 E Country Club Dr  
Benson, AZ 85602-7001



Steve Baumann  
<sbaumann6@comcast.net>

06/13/2008 10:03 AM

Please respond to  
sbaumann6@comcast.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Steve Baumann  
2720 N Kiva Place  
Tucson, AZ 85715

520-886-0654



Merlin Hinrichs  
<merlingh@ieudev.net>

06/13/2008 10:05 AM

Please respond to  
merlingh@ieudev.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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The Public Lands are for public use. Not private Corporation or Public Corporation destruction.....

Merlin Hinrichs  
769 E Country Club Dr  
Benson, AZ 85602-7001



"Marilyn A. Waltasti"  
<mwaltasti@msn.com>

06/13/2008 10:18 AM

Please respond to  
mwaltasti@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Marilyn A. Waltasti  
770 W. Flagstick Drive  
Oro Valley, AZ 85755



"Marilyn A. Waltasti"  
<mwaltasti@msn.com>

06/13/2008 10:18 AM

Please respond to  
mwaltasti@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Marilyn A. Waltasti  
770 W. Flagstick Drive  
Oro Valley, AZ 85755



Sande Rego-Ross  
<saun41@aol.com>

06/13/2008 10:31 AM

Please respond to  
saun41@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Sande Rego-Ross  
9208 North Condor Place  
Tucson, AZ 85742



Jeffrey Holsen  
<anahatatutu@yahoo.com>

06/13/2008 10:35 AM

Please respond to  
anahatatutu@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Jeffrey Holsen  
934 N. 6th Ave.  
Tucson,, AZ 85705



David Morden  
<dinsea@yahoo.com>

06/13/2008 10:36 AM

Please respond to  
dinsea@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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David Morden  
1932 S. Olsen Avenue  
Tucson, AZ 85713



Donna Dehaan  
<donnadehaan@msn.com>

06/13/2008 10:40 AM

Please respond to  
donnadehaan@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Donna Dehaan  
5151 N Soldier Traail  
Tucson, AZ 85749

520-760-1331



Omid Mahdavi  
<omid\_mahdavi@hotmail.com  
>

06/13/2008 11:01 AM

Please respond to  
omid\_mahdavi@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Omid Mahdavi  
5257 N. Via La Doncella  
Tucson, AZ 85750



Benjamin Arseguel  
<propelfilms@yahoo.com>

06/13/2008 11:03 AM

Please respond to  
propelfilms@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Benjamin Arseguel  
2802 Skyway Circle  
skyway circle  
Austin, TX 85711

805.907.5250



Marzena Sienkiewicz  
<nutty4knicks@yahoo.com>

06/13/2008 10:43 AM

Please respond to  
nutty4knicks@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Marzena Sienkiewicz  
8977 N Arrington Dr  
Tucson, AZ 85742



Donna Dehaan  
<donnadehaan@msn.com>

06/13/2008 10:42 AM

Please respond to  
donnadehaan@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Donna Dehaan  
5151 N Soldier Traail  
Tucson, AZ 85749

520-760-1331



Joan Jazwinski  
<jjazwinski1222@msn.com>

06/13/2008 11:05 AM

Please respond to  
jjazwinski1222@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Joan Jazwinski  
9929 E. Placita de las Palmeritas  
Tucson, AZ 85747-9120



Jana Sebring  
<jjcjs@msn.com>

06/13/2008 11:25 AM

Please respond to  
jjcjs@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Jana Sebring  
2904 e hawthorne st  
tucson, AZ 85716



Celia Forno  
<celiaforno@hotmail.com>

06/13/2008 11:28 AM

Please respond to  
celiaforno@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Celia Forno  
7500 n calle sin envidia  
tucson, AZ 85718



Celia Forno  
<celiaforno@hotmail.com>

06/13/2008 11:28 AM

Please respond to  
celiaforno@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Celia Forno  
7500 n calle sin envidia  
tucson, AZ 85718



debra cooper  
<decoopdedoop@hotmail.com  
>

06/13/2008 11:33 AM

Please respond to  
decoopdedoop@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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debra cooper  
1501 n oracle road  
tucson, AZ 85705



Joseph Prchal  
<jprchal@comcast.net>

06/13/2008 11:53 AM

Please respond to  
jprchal@comcast.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Joseph Prchal  
7642 E. Knollwood Circle  
Tucson, AZ 85750

520-795-2802



Shirley Davis  
<smsdav@earthlink.net>

06/13/2008 11:55 AM

Please respond to  
smsdav@earthlink.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Shirley Davis  
6021 E. Avenida Arriba  
Tucson, AZ 85750



Suzanne List  
<suzannelist@yahoo.com>

06/13/2008 12:09 PM

Please respond to  
suzannelist@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Suzanne List  
624 s. rubio ave  
Tucson, AZ 85701



Christine Lillian Jones  
<LillianJones76@msn.com>

06/13/2008 12:19 PM

Please respond to  
LillianJones76@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Christine Lillian Jones  
7159 S Parsons Tale Dr  
Tucson, AZ 85706



Vic DeFrancesco  
<vdf55@hotmail.com>

06/13/2008 12:34 PM

Please respond to  
vdf55@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Vic DeFrancesco  
PO Box 85553  
Tucson, AZ 85754



Lisa Wilson  
<ser5d@earthlink.net>

06/13/2008 12:58 PM

Please respond to  
ser5d@earthlink.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Lisa Wilson  
P.O. Box 653  
St David, AZ 85630



Augusta Davis  
<augustagaye@gmail.com>

06/13/2008 12:59 PM

Please respond to  
augustagaye@gmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. It is incredible to me that the Forest Service would even consider this open-pit mine only 35 miles from Tucson. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Augusta Davis  
6540 W. Box Canyon Dr.  
Tucson, AZ 85745



Phillip Mitchell  
<psmyeolus@aol.com>

06/13/2008 01:46 PM

Please respond to  
psmyeolus@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Phillip Mitchell  
27 W. Roma Dr.  
Oro Valley, AZ 85737



Jeanne Granger  
<moonpie13@comcast.net>

06/13/2008 02:05 PM

Please respond to  
moonpie13@comcast.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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Jeanne Granger  
4880 N. Calle Tobosa  
Tucson, AZ 85749



Una & Brad Yazzie-Czerny  
<jeu4\_16\_@msn.com>

06/13/2008 02:19 PM

Please respond to  
jeu4\_16\_@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Una & Brad Yazzie-Czerny  
14281 S. Renegade Ave.  
14281 So. Renegade Ave.  
TUCSON, AZ 85736

520-822-9483



Robert Moehlman  
<bruce\_moehlman@msn.com  
>

06/13/2008 02:44 PM

Please respond to  
bruce\_moehlman@msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Robert Moehlman  
9225 E Tanque Verde #49201  
Tucson, AZ 85749



Allison Duncan  
<nacnudnosilla@cox.net>

06/13/2008 02:47 PM

Please respond to  
nacnudnosilla@cox.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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Allison Duncan  
2355 E Edison St  
TUCSON, AZ 85719



Philip Muir  
<pmuir@as.arizona.edu>

06/13/2008 04:09 PM

Please respond to  
pmuir@as.arizona.edu

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Philip Muir  
2701 W. Gymkhana Way  
Tucson, AZ 85742



Anna Douglas  
<annannaji@gmail.com>

06/13/2008 04:16 PM

Please respond to  
annannaji@gmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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Anna Douglas  
PO Box 1955  
Green Valley, AZ 85622



John Villinski  
<johnv@abstractsouthwest.com>

06/13/2008 04:05 PM

Please respond to  
johnv@abstractsouthwest.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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John Villinski  
1809 N Nancy Rose Blvd  
Tucson, AZ 85712



Peter Ragan  
<sodwinder@yahoo.com>

06/13/2008 04:38 PM

Please respond to  
sodwinder@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Peter Ragan  
p.o. box 686  
Arivaca, AZ 85601



Chris Frey  
<chrisfrey@yahoo.com>

06/13/2008 05:08 PM

Please respond to  
chrisfrey@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Chris Frey  
3730 W. Placita Graciosa  
Tucson, AZ 85745



Chris Frey  
<chrisfrey@yahoo.com>

06/13/2008 05:10 PM

Please respond to  
chrisfrey@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Chris Frey  
3730 W. Placita Graciosa  
Tucson, AZ 85745



Steve Prchal  
<sjprchal@ventanasencorcovado.org>

06/13/2008 05:37 PM

Please respond to  
sjprchal@ventanasencorcovado.org

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Steve Prchal  
733 S. Kenyon Drive  
Tucson, AZ 85710



kathleen white  
<katylululabelle@yahoo.com>

06/13/2008 05:46 PM

Please respond to  
katylululabelle@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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kathleen white  
324 E Mabel  
Tucson, AZ 85705



MICHELLE LIVINGSTON  
<mlivingston5@netzero.com>

06/13/2008 06:38 PM

Please respond to  
mlivingston5@netzero.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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MICHELLE LIVINGSTON  
5250 N ORACLE RD #22  
TUCSON, AZ 85704



Heather Castor  
<heatherlmayo@yahoo.com>

06/13/2008 07:31 PM

Please respond to  
heatherlmayo@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Heather Castor  
3020 E. 4th St.  
Tucson, AZ 85716



Diane Asch  
<gingercookie211@yahoo.com>  
m>

06/13/2008 08:45 PM

Please respond to  
gingercookie211@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I am very concerned about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can there be an accurate analysis of this proposal proceed without all the details?

It can't.

That's why I urge you to suspend the scoping process until a final plan is received and made available to the public. What is Augusta trying to do? A piecemeal approval of this, or any other mine is not acceptable. If there are no serious cumulative impacts, why do they seem to be hiding things from concerned stakeholders.

Please do not let this happen.

Diane Asch  
2473 S Kevin Dr  
Tucson, AZ 85748



Irma Call  
<irmacall@mindspring.com>

06/13/2008 08:58 PM

Please respond to  
irmacall@mindspring.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Irma Call  
4139-102 N. Stone Avenue  
Tucson, AZ 85705



Rebecca Gray  
<arjay@emerytelcom.net>

06/13/2008 10:04 PM

Please respond to  
arjay@emerytelcom.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Rebecca Gray  
700 West 1220 North  
Price, UT 84501



Michael Houghtaling  
<mahkah@mindspring.com>

06/13/2008 10:43 PM

Please respond to  
mahkah@mindspring.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Michael Houghtaling  
5115 N. Sabino Foothills Dr.  
Tucson, AZ 85750



Shirley Kosek  
<skosek@comcast.net>

06/14/2008 07:53 AM

Please respond to  
skosek@comcast.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Shirley Kosek  
9231 N KANAWHA ST  
Tucson, AZ 85742



Melvin Copeland  
<sundrum@comcast.net>

06/14/2008 08:14 AM

Please respond to  
sundrum@comcast.net

To jderby@fs.fed.us

cc

bcc

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Melvin Copeland  
4165 N. Avenida del Cazador  
Tucson, AZ 85718

520 577-6079



lisa reed  
<azfirehead@yahoo.com>

06/14/2008 09:27 AM

Please respond to  
azfirehead@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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lisa reed  
pob 295  
Green Valley, AZ 85622



Ann Khambholja  
<candyannkhams@yahoo.com>

06/14/2008 11:01 AM

Please respond to  
candyannkhams@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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Ann Khambholja  
6195 E. Rough Rock Drive  
Tucson, AZ 85706



chris hall  
<chrishall.az@hotmail.com>

06/14/2008 01:10 PM

Please respond to  
chrishall.az@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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chris hall  
779 cody loop  
oracle, AZ 85623



Dave Moshel  
<davemoshel@aol.com>

06/14/2008 01:12 PM

Please respond to  
davemoshel@aol.com

To jderby@fs.fed.us

cc

bcc

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Dave Moshel  
102 w 21st street  
tucson, AZ 85701

520-490-3537



Nancy Evans  
<nevanssprint@earthlink.net>

06/14/2008 01:47 PM

Please respond to  
nevanssprint@earthlink.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Nancy Evans  
1461 W. Calle Concordia  
Tucson, AZ 85704

520-742-5642



Elizabeth Garber  
<egarber@email.arizona.edu>

To jderby@fs.fed.us

cc

bcc

06/14/2008 02:01 PM

Please respond to  
egarber@email.arizona.edu

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

The heritage and unique beauty of southern Arizona are an important reason people visit and live in southern Arizona. An open pit mining operation will scar, such as the proposed Rosemont copper mine in the Santa Rita Mountains will be there not just for the rest of our lives, but beyond our children's and our great-grandchildren's.

Please do not let this happen. There's more to southern Arizona than a fast buck.

Elizabeth Garber  
egarber@email.arizona.edu

Elizabeth Garber  
546 S. 4th Ave  
Tucson, AZ 85701



Elizabeth Garber  
<egarber@email.arizona.edu>

To jderby@fs.fed.us

cc

bcc

06/14/2008 02:01 PM

Please respond to  
egarber@email.arizona.edu

Subject Stop the Rosemont Scoping Process

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Elizabeth Garber  
egarber@email.arizona.edu

Elizabeth Garber  
546 S. 4th Ave  
Tucson, AZ 85701



Marilyn Hanson  
<mfhanson@comcast.net>

06/14/2008 02:58 PM

Please respond to  
mfhanson@comcast.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please wait for a final plan.

Marilyn Hanson  
7105 W. Deserama Drive  
Tucson, AZ 85743



Jill Simon  
<lovealien@earthlink.com>

06/14/2008 09:21 PM

Please respond to  
lovealien@earthlink.com

To jderby@fs.fed.us

cc

bcc

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Jill Simon  
12 E. 14th St. Apt. 3E  
New York, NY 10003



erin asch  
<irreverenza@yahoo.com>

06/14/2008 09:37 PM

Please respond to  
irreverenza@yahoo.com

To jderby@fs.fed.us

cc

bcc

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erin asch  
1633 n sycamore blvd #6  
tucson, AZ 85712



Peter Rosalik  
<bluturtl@cox.net>

06/15/2008 09:24 AM

Please respond to  
bluturtl@cox.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Peter Rosalik  
3201 E. FT Lowell Rd APT 1028  
Tucson, AZ 85716



Mark Noethen  
<toe@dakotacom.net>

06/15/2008 11:51 AM

Please respond to  
toe@dakotacom.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Mark Noethen  
7050 N. Camino de Fray Marcos  
7050 n cmo. de fray marcos  
Tucson, AZ 85718

5205442480



Linda Chappel  
<lchappel@cox.net>

06/15/2008 12:52 PM

Please respond to  
lchappel@cox.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Linda Chappel  
blacklidge  
Tucson, AZ 85719



Maria Nasif  
<marianasif@yahoo.com>

06/15/2008 02:59 PM

Please respond to  
marianasif@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Maria Nasif  
6601 n. longfellow drive  
tucson, AZ 85718



Robert Herdliska  
<gprsoutrun@email.msn.com  
>

06/15/2008 03:02 PM

Please respond to  
gprsoutrun@email.msn.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

Because I am greatly concerned about the proposed Rosemont copper mine in the Santa Rita Mountains. I am writing this letter today. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

I am convinced that it can't. For this reason, I urge you to suspend the scoping process until a final plan is received and made widely available to the public. I believe that Augusta is attempting to achieve approval of this mine in a nickle and dime fashion, while hiding the real impacts from us, the concerned stakeholders. Please do not let this happen.

Robert Herdliska  
2631 W. Prato Way  
Tucson, AZ 85741



"Richard I. Marimow"  
<rmarimow@aol.com>

06/15/2008 07:20 PM

Please respond to  
rmarimow@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Richard I. Marimow  
PO Box 42271  
Tucson, AZ 85733



Jean Goetinck  
<jfgoet@email.arizona.edu>

06/16/2008 01:07 AM

Please respond to  
jfgoet@email.arizona.edu

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

Augusta behaves in such a shifty manner that it is not to be trusted. Moreover, it is NOT a mining company - just a front. Canadian companies have not had a very good track record re environmental consideration, in this country. What is left of our glorious SouthWest does not deserve to be sacrificed so that greed can exploit it for "quick profit and run" !!

Jean Goetinck  
2940 W Milton Rd  
Tucson, AZ 85746



Mark & Carol Eirschele  
<TopFlo23@aol.com>

06/16/2008 06:28 AM

Please respond to  
TopFlo23@aol.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Mark & Carol Eirschele  
PO Box 32254  
Tucson, AZ 85751



michael harding  
<harding535@hotmail.com>

06/16/2008 02:02 PM

Please respond to  
harding535@hotmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Sincerely,  
Michael Harding

michael harding  
4121 E Linden  
Tucson, AZ 85712



Akebono Airth  
<i5aki@yahoo.com>

06/16/2008 02:18 PM

Please respond to  
i5aki@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Akebono Airth  
P.O. Box 91993  
Tucson, AZ 85752



Jerry Airth  
<jairthrose1@yahoo.com>

06/16/2008 03:48 PM

Please respond to  
jairthrose1@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Jerry Airth  
p.o. box 91993  
Tucson, AZ 85752



Mark Lorenz  
<buzzmanblue@yahoo.com>

06/16/2008 05:48 PM

Please respond to  
buzzmanblue@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Mark Lorenz  
40 Kensington Terr  
Maplewood, NJ 07040



John Newman  
<connierog@cox.net>

06/17/2008 12:03 PM

Please respond to  
connierog@cox.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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John Newman  
625 N. Belvedere Ave.  
Tucson, AZ 85711



Brett Tucker  
<blisterfree@yahoo.com>

06/17/2008 11:45 AM

Please respond to  
blisterfree@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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Brett Tucker  
495 N Pantano Rd  
Tucson, AZ 85710

401-742-5921



rick sacks  
<rfsacks@gmail.com>

06/17/2008 12:59 PM

Please respond to  
rfsacks@gmail.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

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rick sacks  
2280 N. El Moraga Dr.  
Tucson, AZ 85745



Charles Warlop  
<cdwarlop@peoplepc.com>

06/17/2008 06:48 PM

Please respond to  
cdwarlop@peoplepc.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Charles Warlop  
4100 N Romero Rd Lot 206  
4100 N. Romero Rd., Lot 206  
Tucson, AZ 85705

520=292-6328



Victoria Anderson  
<vanderso@hawaii.edu>

06/17/2008 07:13 PM

Please respond to  
vanderso@hawaii.edu

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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Victoria Anderson  
2579 Lai Road  
Honolulu, HI 96816



Linda Hagar  
<lindah@theriver.com>

06/17/2008 07:48 PM

Please respond to  
lindah@theriver.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

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Linda Hagar  
220 N. Plumer Ave  
Tucson, AZ 85719



John Yerger  
<jyerger24@yahoo.com>

06/18/2008 03:05 PM

Please respond to  
jyerger24@yahoo.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of immense concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason, I implore you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. As a guardian of our nation's natural resources, you MUST NOT let this happen. Thank you for the opportunity to comment on this issue.

John Yerger  
1716 E. 9th St.  
Tucson, AZ 85719



Steve Baumann  
<sbaumann6@comcast.net>

06/18/2008 05:30 PM

Please respond to  
sbaumann6@comcast.net

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

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Steve Baumann  
2720 N Kiva Place  
Tucson, AZ 85715

520-886-0654



"John Able" <jable@fs.fed.us>

Sent by:  
johnable23@gmail.com

06/20/2008 11:59 AM

To "Beverley A Everson" <beverson@fs.fed.us>

cc "Jeanine Derby" <jderby@fs.fed.us>

bcc

Subject Proposed Rosemont Copper Project -- Phone Call  
Documentation: Francis Carter

Bev, Ms. Francis Carter of Green Valley (520-648-1959) called me today at 11:30 a.m. to complain about the proposed Rosemont Copper Project. She has already submitted a 4 page comment, so she simply wanted me to pass onto Jeanine her strong opposition to the proposal. Her main concern was water quantity and quality, but she was also concerned about scenic values, airborne dust, and foreign involvement, especially the investment by Sumitomo.

Jeanine, she asked that I pass on her concerns "with the strongest possible language."

--

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256



"John Able" <jable@fs.fed.us>

Sent by:  
johnable23@gmail.com

06/30/2008 02:39 PM

To "Andrea W Campbell" <awcampbell@fs.fed.us>, "Beverley A Everson" <beverson@fs.fed.us>, "Faye Fentiman" <ffentiman@gmail.com>, "Heidi Schewel" <hschewel@fs.fed.us>, "Jeanine Derby" <jderby@fs.fed.us>, "Melissa Reichard" <mreichard@swca.com>, "Reta Laford" <rlaford@fs.fed.us>, "Teresa Ann Ciapusci" <tciapusci@fs.fed.us>, "Tom Furgason" <tfurgason@swca.com>

cc

bcc

Subject What does the Air Force have to do with the Rosemont proposal?

I promise I'm not making this up.

Just received an interesting call from the Civil Engineering Squadron at D-M. Karen Odin called for the lat/long of the proposed mine. Turns out they have a military training route right over Rosemont, with flight levels as low as 300 ft above the ground. They are concerned that blasting in the area may require this route to be changed. Also, military aircraft emit a lot of electromagnetic (EM) radiation that is not desirable near a radio controlled blasting cap. So, Karen is coming to the hearing tonight and I'll get her card. The Air Force may be a candidate for a letter of interest.

Also, this makes me wonder about other military and some proposed high-tech Homeland Security activity in the area. At Ft. Huachuca, the Army has lots of devices that emit EM, including radars, and I've seen their convoys operate along Hwy 83.

And what about the SBI-Net equipment DHS is putting into operation. Any concerns there? Lastly, isn't the National Weather Service doppler radar site nearby?

--

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256



"John Able" <jable@fs.fed.us>

Sent by:  
johnable23@gmail.com

07/07/2008 12:25 PM

To "Melissa Reichard" <mreichard@swca.com>

cc "Beverley A Everson" <beverson@fs.fed.us>, "Teresa Ann  
Ciapusci" <tciapusci@fs.fed.us>

bcc

Subject Phone Call Documentation for the Admin Record: Elizabeth  
Webb

Just wanted to document the phone call I just had with Elizabeth Webb at about 11:00 a.m. this morning, July 7, 2008.

She wants to go "on the record" as requesting a hearing for the Vail area. In a previous phone conversation, she said she was not requesting a hearing because of "meeting fatigue." However, while she remembers that comment, her emphasis this week is to push for a hearing. She and others will be sending out many emails and making other contacts with us and with elected officials. She said she knows we have exceeded the requirements of NEPA to conduct scoping.

Finally, she says she does not expect any of us to reply to her many email requests.

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256



"John Able" <jable@fs.fed.us>

Sent by:  
johnable23@gmail.com

07/09/2008 10:56 AM

To "Beverley A Everson" <beverson@fs.fed.us>, "Teresa Ann Ciapusci" <tciapusci@fs.fed.us>, "Tom Furgason" <tfurgason@swca.com>

cc

bcc

Subject Fwd: Question from Public regarding Population Residing near Rosemont

Is this the type of information we will develop? If so, could I provide some answer about when? Or do we already have this info available?

----- Forwarded message -----

From: <jchambers2@cox.net>

Date: Wed, Jun 11, 2008 at 6:29 AM

Subject: Question regarding Rosemont

To: [jable@fs.fed.us](mailto:jable@fs.fed.us)

John - I am availing myself of the email address you posted on the Daily Star web page this morning. Hope you don't come to regret having done this!!

My question arises from another post on the same site. The writer said that the feelings of people living adjacent to the mine site should be given greater weight during decision-making.

This seems sensible enough. My question is: how many people live adjacent to the mine (say within a 3 mile, or a five-mile, radius?)

Thanks, Jeff

--

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256

**Melissa Reichard**

---

**From:** Beverley A Everson [beverson@fs.fed.us]  
**Sent:** Friday, August 22, 2008 10:54 AM  
**To:** Melissa Reichard  
**Subject:** Fw: Comment from Kelly Brumbaugh -- Please Add to Scoping Comments

Beverley A. Everson  
Forest Geologist  
Coronado National Forest  
300 W. Congress Street, 6th Floor  
Tucson, AZ. 85701

Voice: 520-388-8428  
Fax: 520-388-8305

----- Forwarded by Beverley A Everson/R3/USDAFS on 08/22/2008 10:54 AM

-----

"John Able"  
<jable@fs.fed.us>  
Sent by: To  
johnable23@gmail. "Melissa Reichard"  
com <mreichard@swca.com>  
cc  
"Tom Furgason"  
07/21/2008 09:09 AM <tfurgason@swca.com>, "Beverley A  
Everson" <beverson@fs.fed.us>  
Subject  
Comment from Kelly Brumbaugh --  
Please Add to Scoping Comments

Mr. Brumbaugh sent this comment to my email prior to July 14th. Can we put it into the scoping comments?

----- Forwarded message -----

From: Kelly F Brumbaugh <kfbrumbaugh@juno.com>  
Date: Mon, Jul 21, 2008 at 7:55 AM  
Subject: Re: Rosemont Copper Mine  
To: jable@fs.fed.us

John,

Thank you so much for taking the time to read and respond to my email concerning the Rosemont Junction mine proposal. You are the only one I emailed, therefore I'd be very appreciative if you would forward my comments as you mentioned below...

Kelly Brumbaugh 7/21/08

On Sun, 20 Jul 2008 10:42:32 -0700 "John Able" <jable@fs.fed.us> writes:

Hi, Mr. Brumbaugh. Sorry it took me so long to respond. I've been on vacation and am just catching up with my email. Thank you for your thoughtful comments. I'm just wondering if I am the only one you've sent these to, or did you also formally submit your comments by July 14th via letter, fax, or email as described on our website at <http://www.fs.fed.us/r3/coronado/rosemont/comments.shtml>?

If you did not already submit them as a formal comment before the scoping comment period closed on July 14th, I can do that for you since you sent this to me prior to that date. Just let me know whether you want me to add this email to our scoping comments by either responding to this email or giving me a call at 405-4256.

Thanks!

--

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256

On Thu, Jul 10, 2008 at 6:21 PM, Kelly F Brumbaugh <kfbrumbaugh@juno.com> wrote:.

Hello John,

My name is Kelly Brumabaugh, a native to Tucson and Arizona for 48 years.

I would like to express my concerns and reservations regarding the proposed mine. I'll keep it brief and to the point as, I'm sure you have many responsibilities and many mailings to read and consider.

I believe, we have more important issues than revenue from another major open pit mine. We have already lost 90% of the riparian area AZ. had 150 years ago. What will be left for our grandchildren? Isn't there another option? Can't they dig for more copper in San Manuel, Ajo or Clifton in existing scars on the land? I realize mines made it possible for AZ. to be settled, but when is enough, enough? When I was a young man in this area, there were many places close by to visit that had running water and beautiful riparian areas...now I must use 4 wheel drive and travel long and far to see equivalent areas.

Please do whatever you can to help save the remaining beautiful areas around Tucson, because once they are gone, no amount of revenue will replace them! I have heard that the mine company has promised more water to the Green Valley People but is it really necessary? Some people may only learn to be more conservative with precious resources when we allow

a  
shortage to exist. Too bad the Phoenix area has not learned to be a  
zero  
scape community like Tucson has.

Sincerely,

Kelly Brumbaugh  
Concerned Citizen and Native  
7/10/08

---

Fabulous Spa Getaway!

Enter for your chance to WIN great beauty prizes everyday!

<http://thirdpartyoffers.juno.com/TGL2141/fc/JKFkuji7Urpv2LLXfX2xi6KVcJQ68k2LtNJUCzvvAMYvtksyiiFnwp/>

--  
John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256



Jeanine Derby/R3/USDAFS

07/11/2008 12:42 PM

To bonnieisenberg@msn.com

cc John Able/R3/USDAFS@FSNOTES, Beverley A  
Everson/R3/USDAFS@FSNOTES, Faye L  
Krueger/R3/USDAFS@FSNOTES

bcc

Subject Fw: outrage at being ignored

Scoping is the beginning of a thorough and complex NEPA process to respond to the proposed mine. During the past 120 days we have gathered lots of useful information from members of the public (you included) expressing concerns and questions about this proposal. We had 9 public open house and hearing opportunities for people to meet with us and many more opportunities for them to communicate with us in written or e-mail form. Now it is time to take all of the information provided and to develop the issues that will guide the analysis.

Note that we only have to hear a critical question once for it to influence the analysis. Conversely, when we hear the same thing many times, it still functions as one piece of input that informs & influences the analysis. Your input is important and has been heard.

We tried our best to schedule meetings in locations that were convenient for the interested parties. I am sorry that this didn't meet your expectations. Please take advantage of our web site which will continue to inform you about what is happening in next steps as we proceed through the EIS process.

Jeanine Derby, Forest Supervisor

Coronado National Forest

phone: 520 388-8306

FAX: 520 388-8305

----- Forwarded by Jeanine Derby/R3/USDAFS on 07/11/2008 12:20 PM -----

Faye L Krueger/R3/USDAFS

07/11/2008 11:04 AM

To "Bonnie Isenberg" <bonnieisenberg@msn.com>

cc John Able/R3/USDAFS@FSNOTES, Jeanine  
Derby/R3/USDAFS@FSNOTES

Subject Re: outrage at being ignored

Bonnie, I have cc this note to John and Jeanine for their response.

Faye Krueger

Deputy Regional Forester

Southwestern Region

505-842-3307

cell-505-280-8433

"Bonnie Isenberg" <bonnieisenberg@msn.com>



"Bonnie Isenberg"  
<bonnieisenberg@msn.com>

07/11/2008 08:59 AM

To <fkueger@fs.fed.us>

cc

Subject outrage at being ignored

Ms. Krueger,

I live with my family just 5 miles from the proposed Rosemont mine. I never thought when we decided to move here, less than two years ago, that I would become involved in a battle with corporate America. It is simply a case of GREED that has now put this beautiful area of the west in such peril. I am so tired of watching the way a corporation can come in and spin so called facts to suit their needs and reduce the concerns of the unsuspecting public as nothing but the ramblings of those crazy environmentalists, nimbys, senior citizens, and college kids.

After attending the Patagonia Open House which was put on by the Forest Service in an attempt to educate the public about the Proposed Rosemont Mine, I became outraged at what I witnessed. One man stood up on a chair in an attempt to get the attention of the Forest Service and Rosemont representatives, to ask for an open forum, a discussion, a question and answer session with them. The response we received was to have the police, border patrol and other official law enforcement called in to keep the peace. Rosemont officials have done everything in their power to continue to give the impression that they want to be good neighbors to those of us living close to the Proposed mine site, while behind the scenes it is a different story. Buying up URL's that would oppose the mine such as " no rosemont mine" " stop rosemont mine" " Save the Scenic Santa Rita's", distorting the numbers as far as the approval of Arizona citizens with their survey results of 64.5% by asking FAIRYTALE questions, and then the job fair held just 2 days prior to the last scoping meeting at the Rincon high school. Spouting to all the world that the United States needs the copper that they would be mining, when in reality it is only the fact that the price of copper has reached an all time high that has prompted this venture. Again it is GREED rather than NEED that has put our land in jeopardy.

We are not just a few senile crazies spouting dribble in an effort to stop this mine. In fact we are people from all walks of life, some have never before been involved in anything like this fight before. For the average person to find the courage to get up in front of a crowd and passionately speak their mind, should give you some indication how serious this issue is. It is crazy to put the WANTS of a few, over the NEEDS of many, WATER is the issue at hand. Rosemont can continue to spin the story all they want, but people NEED water to survive, putting our water at risk is not the right thing to do.

I am asking you to help us get another open mike hearing put in place before the July 14th deadline. The Vail citizens deserve to be heard in their own town and not ignored by the Forest Service.

Thank you for your time in this matter,

Bonnie Isenberg

[bonnieisenberg@msn.com](mailto:bonnieisenberg@msn.com)

15560 E. Hilton Ranch Road

Vail, Arizona 85641

1-520-762-5240

JROGERSINC@aol.c|

om |

07/13/2008 12:40|

PM |

To: mailroom\_r3\_coronado@fs.fed.us

cc:

Subject: Jeanine Derby, Forest Supervisor

Dear Ms. Jeanine Derby

As an engineer with experience in treating waste water from metal processing facilities, I recommend that the Rosemont mining operation be required to treat and recycle all the water they use for mining purposes. It can be done.

Why would Rosemont want to get rid of waste water? If it isn't good enough for them, it certainly is not good enough to put into our rivers and streams.

John Rogers  
Professional Engineer

Get the scoop on last night's hottest shows and the live music scene in your area - Check out [TourTracker.com](http://TourTracker.com)!



Jeanine Derby/R3/USDAFS  
07/14/2008 02:21 PM

To Beverley A Everson/R3/USDAFS@FSNOTES, Teresa Ann Ciapusci/R3/USDAFS@FSNOTES  
cc  
bcc

Subject Fw: Rosemont Copper Project Comments Environmental Justice and Employment Issues Elizabeth Webb

this might contain some useful information to consider addressing in our scoping report.

Jeanine Derby, Forest Supervisor  
Coronado National Forest  
phone: 520 388-8306  
FAX: 520 388-8305

----- Forwarded by Jeanine Derby/R3/USDAFS on 07/14/2008 01:31 PM -----



Vail Arizona  
<vailaz@hotmail.com>  
07/14/2008 11:59 AM

To "comments-southwestern-coronado@fs.fed.us" <comments-southwestern-coronado@fs.fed.us>, "cnewman@fs.fed.us" <cnewman@fs.fed.us>, "ccook520@aol.com" <ccook520@aol.com>, Bonnie I senberg <bonnieisenberg@msn.com>, "coyotes@cox.net" <coyotes@cox.net>, "deadlass14@msn.com" <deadlass14@msn.com>, homeandranch <homeandranch@gmail.com>, "horst\_greczmiel@ceq.eop.gov" <horst\_greczmiel@ceq.eop.gov>, Jim Kramp <hiltonroad@msn.com>, Reta Laford <rlaford@fs.fed.us>, John Able <jable@fs.fed.us>, <jderby@fs.fed.us>, "nicole.fyffe@pima.gov" <nicole.fyffe@pima.gov>, "ron.barber@mail.house.gov" <ron.barber@mail.house.gov>, "district4@pima.gov" <district4@pima.gov>  
cc

Subject Rosemont Copper Project Comments Environmental Justice and Employment Issues Elizabeth Webb

Elizabeth Webb  
Vail/Cienega Corridor Scoping Questions  
14 July 2008  
Coronado National Forest Rosemont Copper Project

These are just some scoping questions and I reserve the right to send in more before 11:59pm July 14th 2008 although I still hold out hope that someone will hear our pleas and see the incredible injustice that is being wrought upon our community within the 425 square miles and give us a stay and schedule a hearing and associated scoping continuance.

**1. 5 Local Community P7 Mine Plan of Operations**

Accurate distances to the affected communities and the proposed impacts to each community were not listed separately.

**-Why was this not required by the Coronado National Forest prior to acceptance of the MPO?**

The only distance listed is one to the city center of Tucson Arizona, from the proposed project. -I request that each distance be measured and each location listed, Sonoita, Patagonia, Sahuarita, Green Valley, Corona, Vail and its associated diverse communities which are not limited to but include: New Tucson, Rita Ranch, Civano, Marsh Station, Rincon Valley, Empire Mountains, Copper Cut, J-6 and Voyager R-V Resort be independently studied with the associated proposed impacts.

Additionally, I would like to know what specific outreach techniques were used to draw these individual communities into the discussion about the proposed project, particularly the communities with environmental justice issues.

**-Why was there only one Open House held in the Vail Unified School District's 425 Square mile boundaries?**

**-Why wasn't there an Open Mic hearing held in the VUSD's 425 Square mile boundaries?**

**- Why were the last two Open Mic hearings held during the VUSD's modified condensed summer break?**

**-Why weren't direct mailer labels sent to the addresses within the most impacted areas, even though I made this suggestion to Ms. Everson in March of 2008?**

#### **1.5.1 Population Demographics Mine Plan of Operations P 7.**

The MPO makes in clear that there were two waves of population to the area. First, it illustrates one of Mexican and Native American Ancestry and then secondly new residents within the last 10 to 15 years.

Within the VUSD if you use the voter registration logs it is more accurate that the second wave is within the last ten years.

[http://www.recorder.pima.gov/ttls\\_by\\_precinct.aspx](http://www.recorder.pima.gov/ttls_by_precinct.aspx) and  
[http://www.pima.gov/elections/p\\_result.htm](http://www.pima.gov/elections/p_result.htm)

#### **Vail Unified School District Registered Voter Totals:**

**1998** General Election **6869** registered voters-

2000 General election (presidential)- 9846 registered voters

2002 General election-10345 Registered voters

2004 (presidential) -16,652 Registered Voters

2006 General Election 19,454 registered voters

**2008** Today (presidential)-**24,310** registered voters

REGARDLESS, as early as 2007, the Coronado National Forest has been aware that one, there was a potential for Environmental Justice issues based on Ethnicity, or two, that holding

meetings during the summer with a NEW population was going to skew any attempt to receive accurate testimony. Given those issues-

1. Why didn't the Coronado National Forest request any Census Tract/Block information for all of the impacted areas, to include Sahuarita Heights, the well field pumping area before accepting the MPO from Rosemont Copper? If it had done so, it would have learned that Sahuarita Heights is in a HUD designated Colonia and perhaps Environmental Justice, one of the Executive Orders mentioned as being a requirement would have been more of an issue.

2. What sort of specific outreach did the Coronado National Forest do to reach communities with environmental justice issues? (Aside from citizen's notifying the Forest?). I am not asking about the fax, email and snail mail address. The phone number was not added until nearly the end (1<sup>st</sup> press release 28 June 2008-also given out in free Tucson Citizen Newspapers at the Mining Career Fair held at Rincon High School on June 28<sup>th</sup> at Rincon High School) How did the CNF reach these people, without computers? Did the CNF send out bulk mailers to all of the impacted areas? Did it do outreach in the schools? Did it go door to door as Rosemont Copper did? I would like specific examples. Also, when did these outreach attempts occur for each specific community?

### **3. Significant Employers Mine Plan of Operations P8**

The MPO lists Silverbell mine 75 miles NW of the project. It has 4 open pits, and other plant facilities on 18,000 acres. It lists a solvent extraction plants, and various other area. It lists employees of 125.

The Mission Complex consists of a few properties near Sahuarita has the Mission Mine pit 2.5 miles long by 1.5 miles wide on 20,000 acres. It lists 188 employees.

The Sierrita Mine, one of the largest in the area (but does not list the size) employees 750. The mine produces 750. It produces copper, moly, and rhenium. It has solvent extraction and electrowinning plant (SX/EW plant), a concentrator and moly roasting plant.

**My question is this-How can the proposed Rosemont Copper mine with a pit only 1 mile wide or so, on aprox 4,415 acres (p9) , a SX/EW plant, and no roaster will produce an annual 500 jobs?(p9) If this is a calculation of the balancing act the Forest must weight, it seems as if the Forest must compare this to experienced operating mines very carefully to determine if the employee count is accurate.**

#### **Another Question-**

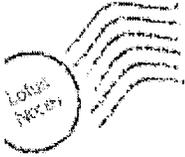
-What sort of outreach has the Coronado National Forest done for potential employees of Rosemont Copper? When I stood in line at the Natural Resources Mining Career Fair it was quite apparent that the people I spoke with that they thought the mine would be up and running in two years. (The Fair date was June 28<sup>th</sup> 2008). Obviously given legal requirements with the NEPA process this could not be true, so again, I ask.

**-What outreach was done for potential employees of the Rosemont Copper mine?**

**-Did the CNF visit existing mines and educate the employees on the process and how long these things can take?**

**-What other methods were used to let people know about the process?**

**-Did the CNF visit employee agencies and head hunters to let them know how long these processes can take?**



**Beverley A  
Everson/R3/USDAFS**  
08/02/2008 02:59 PM

To idgie75@hotmail.com  
cc  
bcc  
Subject Fw: Rosemont Mine Project

Sue,

Your comment is important to the project, and I am unable to open it in the format it is in. Would it be possible for you to reformat it into a .rtf, .pdf or .doc so the it can be read by the staff at the Coronado National Forest?

Thank you.

Beverley A. Everson  
Forest Geologist  
Coronado National Forest  
300 W. Congress Street, 6th Floor  
Tucson, AZ. 85701

Voice: 520-388-8428  
Fax: 520-388-8305

----- Forwarded by Beverley A Everson/R3/USDAFS on 08/02/2008 02:56 PM -----



**Roxane M Raley/R3/USDAFS**

07/31/2008 07:54 PM

To Beverley A Everson/R3/USDAFS@FSNOTES  
cc  
Subject Fw: Rosemont Mine Project

Beverley,

This comment cannot be opened as it is a version of Word that is newer than what we have to use. We can accept comments in other formats, including .rtf, .pdf and .doc

Roxane



*Roxane Raley*

*Resource Assistant*

Ecosystem Management and Planning  
R3, Coronado National Forest  
300 W Congress, Tucson, AZ 85701  
(520) 388-8354  
[rmrale@fs.fed.us](mailto:rmrale@fs.fed.us)

"Human beings are not things to be motivated  
and controlled; they are four dimensional –  
body, mind, heart and spirit."

— Dr. Stephen R. Covey, from *The 7th Habit:  
From Effectiveness to Greatness*

----- Forwarded by Roxane M Raley/R3/USDAFS on 07/31/2008 07:46 PM -----



"Sue Smades"  
<[idgie75@hotmail.com](mailto:idgie75@hotmail.com)>  
07/12/2008 02:33 PM

To: <[comments-southwestern-coronado@fs.fed.us](mailto:comments-southwestern-coronado@fs.fed.us)>  
cc: <[rasa@theeponacenter.com](mailto:rasa@theeponacenter.com)>  
Subject: Rosemont Mine Project



Please see the attached letter written in protest of the Rosemont Mine Project. [mineletter.docx](#)

## Melissa Reichard

---

**From:** Beverley A Everson [beverson@fs.fed.us]  
**Sent:** Friday, August 22, 2008 10:39 AM  
**To:** Melissa Reichard  
**Subject:** Fw: Flawed Rosemont mine scoping process, information, and hearing locations

Beverley A. Everson  
Forest Geologist  
Coronado National Forest  
300 W. Congress Street, 6th Floor  
Tucson, AZ. 85701

Voice: 520-388-8428  
Fax: 520-388-8305

----- Forwarded by Beverley A Everson/R3/USDAFS on 08/22/2008 10:39 AM

-----

"John Able"  
<jable@fs.fed.us>  
Sent by: johnable23@gmail.com To: "James Kramp" <jimkramp@msn.com>  
cc  
Subject  
07/18/2008 07:00 AM Re: Flawed Rosemont mine scoping  
process, information, and hearing  
locations

Hi, Mr. Kramp. My name is John Able with the Coronado National Forest Office of Communications. I just wanted you to know that I read your email and that I'm listening to your concerns. If you ever want to discuss any of these issues, please don't hesitate to call me on my mobile at 520-405-4256.

On Tue, Jul 15, 2008 at 12:22 AM, James Kramp <jimkramp@msn.com> wrote:  
My name is Jim Kramp. I maintain the [www.hiltonroad.com](http://www.hiltonroad.com) website.

I am requesting help from all you that I have sent this too. It concerns the Forest Service Scoping process for the proposed Rosemont Mine.

Many members of the Hilton Ranch Road community feel the entire scoping

process for the proposed Rosemont mine has been flawed from the beginning.

Many in the public have been led to believe that the Proposed Rosemont mine is a "done deal". The public was not informed and did not understand the purpose of the scoping process. The Forest Service, nor the media have made it clear that one option available to the forest service is a decision of "no action" which itself is not very clear, it means the mine would not be permitted nor allowed to use the forest service land as proposed. The initial media coverage of the proposal repeatedly failed to mention this option but included comments by Augusta representatives that would lead the public to believe that it is a "done deal" and the mine would be permitted. A Fox 11 news report on May 12 2008, 74 days after the forest service published the Notice of intent to prepare an Environmental Impact Statement, made it clear that the media was just as confused as the public. Fox 11's Delane Cleveland pretty much summed up how he portrays this process, quote "well the reality is that the federal mining law in effect today was passed in 1872 so it makes it easy for companies such as this to put mines on public lands virtually wherever they want and there's not a whole lot people can do about it". Heather Moore responded, "well if there's not much the public can do about it why have the scoping meetings" to which Delane responded "well there's still always that little bit of hope". Was the media properly educated about the NEPA process? If not, shouldn't the forest service have clarified this process to them so they didn't misinform the public?

If the process wasn't confusing enough for the public, The numbers provided to them certainly were.

Rosemont's MPO indicates that the water requirements are approximately 5,000 acre-feet per year. This number is used repeatedly in the media. However, Rosemont has permits with the Arizona Department of Water Resources to withdraw up to 6,000 acre feet per year. An article in the Arizona Daily Star from 5/28/2008 titled "mine execs offer water assurances" said "a mine the size of the one proposed by Rosemont Copper normally would use enough water every year to supply 40,000 households. Officials with Rosemont Copper say they will only use half that much, 5,000 to 8,000 acre-feet a year, by using techniques developed for mining in extremely arid climates.". Rosemont claims they are purchasing 105,000 acre feet of cap water and will only use 95,000 acre feet, leaving the public an excess of 10,000 acre feet. However if they were to use 8,000 acre-feet per year they would draw 47,000 acre feet more than they intend to purchase. If their estimates could be 60% off, Shouldn't the public be aware of this? Shouldn't it be stated in the MPO?

When the Rosemont proposal was first introduced an article in the Arizona Daily Star dated 6/24/2006 quoted Jaime Sturgess stating the mine would employ an estimated 350 people. In the minutes from a meeting by the

Committee on Natural Resources held 2/4/2007 Mr Sturgess stated the number of jobs had grown to 400 with an average annual wage of \$59,000 per year. On 4/13/2008 in an article by the Arizona Daily Star the mine executives stated the mine will create 500 new jobs. Which number is correct?

Section 2.10 of the Rosemont Mine Plan of Operations concerning Transportation states "The most sensitive times of the day are considered to be around shift change and early weekday mornings and afternoons during school bus hours on SR 83. Van pools for employees and staggered work shifts will be used to reduce the number of trips during these times of the day." Where will the parking lots be located so workers can be picked up by the vans? Also all numbers referring to truck traffic are presented as round trip numbers not reflecting the true volume of traffic. Rosemont claims "The shipments will be scheduled to avoid the high traffic hours on SR 83 during early mornings, afternoons, and at shift change" I propose Rosemont should provide a more detailed traffic analysis taking into account their avoidance of "the most sensitive times of day". I also propose a detailed plan for their employee bussing program be completed including gathering points and times, parking facilities, and that a schedule is created that must be followed by both Rosemont and their Sub contractors for all truck traffic.

Repeatedly the location of the mine has been referenced as 30 miles SE of Tucson. This is true if you are measuring to the city center. But the reality is the proposed location of the mine is 18 miles from Tucson city limits, 13 miles from the center of Green Valley, 9 miles from the center of Corona De Tucson, 10 miles from the Sonoita Crossroads, 16 miles from the center of Vail, 18 miles from the center of Patagonia, 21 miles from Tubac, 32 miles from Nogales, 32 miles from Sierra Vista, and 39 miles from Tombstone. One would think the public should have been informed of the distance of this project from the other areas that could be impacted.

How much land does Rosemont actually own, lease, or want? From an article in the Arizona Daily Star dated 10/13/07 "the copper mine will be built on the Rosemont Ranch, A 20,000 acre ranch about 30 miles South of Tucson. An article from 1/24/08 in the Tucson Weekly says "Augusta has been snatching up properties around Rosemont Valley in the Santa Rita mountains and currently owns 18 separate parcels including leased government land totaling about 30,000 acres. From an article in the Arizona Daily Star dated 3/13/2008 "The 4,755-acre Rosemont Copper Project would be built on 995 acres of private land, 3,670 acres of national forest, 15 acres of land administered by the Bureau of Land Management and 75 acres of state trust land" From an article in the World Mining Stocks from Sept of 2007 "Gil Clausen, president and CEO of Augusta Resource noted that although developing Rosemont is the companies primary focus, three other properties in Augusta's land holdings offered opportunities for further exploration. These properties are the Peach-Elgin, Broadtop Butte, and Copper World prospects." The article makes it clear that Augusta has no intentions of stopping with the Rosemont Mine. Rosemont may be where they plan to start but it looks like they intend on pursuing several future mines along the

Sonoita-Patagonia Scenic route, and one on the west side on the Santa Rita's which will be visible from Green Valley. Augusta is not making it clear to the public what their future intentions are in the Santa Rita's, nor can the cumulative impact of exploiting all of these deposits be considered.

The Publics lack of understanding the NEPA process has been facilitated by comments made by both forest service representatives and Augusta representatives. Repeated comments would lead the public to believe that opposition of the mine is limited. For example an article in the Arizona daily star published 4/06/2008 about the Vail open house said the following about comments from Jamie Sturgess. Here is a quote "He bristled at the statement that nearly everyone at the forum was against the mine. That wasn't so, he said, and to prove his point he called over Karl Weiss, a Tucson resident, who said he supports the jobs. Weiss referred to the crowd as a mixture of "yuppies," "college kids" and "senior citizens" who have time to come to such a forum. Anyone working, and presumably supporting the mine, would be with their family, he said. He then acknowledged that he was biased for the mine because he works for the firm. "I do some work as a consultant for Rosemont," he said. "Obviously, I have a vested interest in seeing the mine go in". Other articles have referred to the opposition as consisting of nothing but environmentalists, NIMBYS and the Pima County Board of Supervisors. I think they have understated the opposition!

When does the public commenting period for the scoping process actually end? Numerous comments from Forest Service personnel have indicated that public comments will be accepted after 7/14/08. From an article in the Tucson Citizen published 6/9/2008 "The service will not stop taking comments after the official comment period ends July 14, a spokeswoman said. We will continue to accept comments past that point, said Heidi Schewel of the Coronado National Forest." From an article in the Green Valley News and Sun published 6/10/2008 "The Forest Service will hold another hearing on June 30 at Rincon High School in Tucson and will continue taking comments after the official comment period ends July 14, a spokeswoman announced at the meeting. Comments can be given in several formats and information is available on the Web site of the Coronado National Forest." From an article in the Arizona Daily Star published 6/11/2008 "U.S. Reps. Raúl Grijalva and Gabrielle Giffords, both Tucson Democrats, wrote Derby last month seeking to have the scoping effort started over. They said their constituents and local government officials are confused about deadlines for submitting comments." The Citizen Guide to the NEPA process clearly states "if you feel strongly that a particular alternative should be addressed and you don't raise it during the scoping process then it won't get the benefit of comparative analysis with the other alternatives." Our question is will comments and alternative received after 7/14/08 receive the comprehensive analysis like those received before that date? If not then we feel the forest service has misled the public and hindered the timely efforts necessary to do the research needed to get their informed comments into the forest service by the scoping process deadline. I propose a firm date should

be set for an end of the public commenting period, or no date at all should be set.

According to the proposed timeline established in the memorandum of understanding between the Forest Service and Rosemont officials, the forest service has indicated the Draft EIS will be completed by March of 2009. How can they provide this estimate prior to the end of the public scoping process? Is this a restricting date, or will it be extended as necessary to provide the time needed to research all of the public's comments and alternative proposals. I propose this should not be a set date, but must remain flexible.

I am concerned because information has not been readily available to the public. Since April of 2006 Augusta Resources and/or their public relations firm Strongpoint have been the registered owners of the following domain names, [www.stoprosemont.com](http://www.stoprosemont.com), [norosemontmine.com](http://norosemontmine.com), and [savethescenicantaritas.com](http://savethescenicantaritas.com). The only rational purpose for them to own those domain names would be to try to suppress opposing information from the public. The open houses hosted by the forest service for the purpose of educating the general public did not provide adequate facilities to organizations opposed to the Rosemont mine, or those attempting to educate the public about the negative impacts of this mine. For example, at the Elgin and Vail open houses these organizations were allowed to set up information booths but were not provided a comfortable environment to discuss those concerns with the general public, extreme heat, wind, and bright sun were the conditions we had to contend with. The Sahaurita meeting was held at a facility that would not allow any opponents to the mine to set up information for the general public.

While I applaud the forest services decision to add three open mike meetings to the agenda I question the selection of the chosen locations. Public anger at the Patagonia meeting concerning the format of the open houses should certainly warrant an open mike meeting in that community. The Vail community with the most impact from the mine should be provided an open mike meeting, as should Green Valley who is already greatly impacted by mining. We find it ironic that the three communities currently threatened by mining activities are not being provided the opportunity to voice their concerns at a reasonable location.

There have been many flaws in the public scoping process for the proposed Rosemont Mine. Neither the public, nor the media seem to understand the process, many think the mine is a "done deal". The numbers presented throughout this process have been confusing, the amount of land being considered is not clear, the proposed water consumption is not clear, the number of jobs the mine would create is not clear, the amount of traffic the mine will generate, or when it will travel on state route 83 is not clear, the actual distance from municipalities, National preserves, and sensitive areas is not clear, the end of the commenting period is not clear. Those impacted most by the proposal have not had reasonable access to voice their comments, and organizations attempting to educate the public about the negative impacts of the mine proposal have been

intentionally excluded from the public information hearings, or not provided reasonable accommodations. As you have heard there are many reasons to feel the scoping process was flawed from the beginning, I can see why Representatives Grijalva and Giffords requested it be started over, and I thank them both for their efforts. In conclusion, I propose a committee of forest service representatives, Rosemont representatives, concerned citizens, and our federal representatives be formed to analyze the scoping process to date, identify problems and create solutions. Our group would gladly contribute to this process.

If you have not had a chance to learn about the issues please take some time and visit our website [www.hiltonroad.com](http://www.hiltonroad.com) .

Thank You

James Kramp  
[www.hiltonroad.com](http://www.hiltonroad.com)  
520-762-8345

--

John A. Able  
Office of Forest Communications  
Coronado National Forest  
Mobile: 520-405-4256

Roxane Raley

08/04/2008 04:22:18 PM

Re: Comments on



<lhinchliffe@cox.net>  
08/02/2008 07:53 AM

To Roxane M Raley <rmraley@fs.fed.us>  
cc  
bcc  
Subject Re: Comments on Rosemont Project

Thanks for your receipt. The document is a copy of comments submitted electronically on 7/13/2008. I sent the hard copy in case you couldn't open the e-copy.

Larry Hinchliffe

----- Roxane M Raley <rmraley@fs.fed.us> wrote:  
> Return Receipt  
>  
> Your Comments on Rosemont Project  
> document:  
>  
> was Roxane M Raley/R3/USDAFS  
> received  
> by:  
>  
> at: 08/01/2008 16:44:24  
>  
>  
>  
>



George McCain  
<edward@mccainphoto.com>

06/15/2008 01:41 PM

Please respond to  
edward@mccainphoto.com

To jderby@fs.fed.us

cc

bcc

Subject Stop the Rosemont Scoping Process

Dear Supervisor Derby,

I write out of great concern about the proposed Rosemont copper mine in the Santa Rita Mountains. Despite having rejected Augusta Resource Corporation's mining plan of operations and making repeated requests for further information, the Coronado National Forest still has not received a finalized plan. How can any meaningful analysis of this proposal proceed without the necessary details?

It can't. For that reason I urge you to suspend the scoping process until a final plan is received and made widely available to the public. It seems that Augusta is attempting to achieve piecemeal approval of this mine, while hiding its true and cumulative impacts from concerned stakeholders. Please do not let this happen.

George McCain  
211 S 4th Avenue  
Tucson, AZ 85701

520-623-1998