Questions concerning SR83 Safety:

1. The School buses are on the road M-F from 6:00AM to 8:30AM, 11:00AM to12:00PM and from 1:00PM to 6:00PM. Will trucks carrying ore or explosive supplies to the mine travel on the road during these hours?

2. Will the I-10 Marsh Station Bridge be updated to eliminate the oversized loads now routed through SR83, or will these loads share this dangerous winding road with Augusta's trucks?

3. Will passing lanes be installed anywhere along SR83 to allow traffic to pass slower moving trucks?

4. How much more frequently will road maintenance be required on SR83 due to the volume of heavy trucks if the Rosemont mine is approved? **Since it is a two lane highway construction has a major impact on travel times and safety.**

5. Can SR83 in its present state support the loads and volume that Augusta has presented?

6. Wouldn't it be better and less intrusive on the current SR83 travelers to improve it before opening the mine so it can handle the additional volume of heavy trucks, perhaps make it a concrete highway in the sections supporting heavy trucks?

7. The Portland Cement mine approved in the Empire Mountains will also be sending Trucks onto SR83. What will the cumulative effect of Rosemont traffic and Portland's traffic have on safety?

8. The interchange from I-10 onto SR83 is not the safest. It consists of sharp curves, and an intersection of I-10 traffic, frontage road traffic, and old Sonoita highway traffic. It can be a very confusing intersection. Shouldn't this interchange be redesigned to handle the large increase in traffic volume before people die?

9. Is the Arizona Department of Transportation involved in the mine approval process to ensure proper planning to account for the increased SR83 use and safety issues?

10. Has the Federal Highway Safety Administration information from the Arizona 2007 Five percent report which outlines the top 5 percent of its locations currently exhibiting the most severe highway safety needs be taken into account when determining SR83 safety?

Loss of Scenic Beauty and Public investment

Questions about scenic impact: I know they want to limit our questions to what they are doing today at Rosemont, but they were very clear in their desire to "explore" Peach-Elgin, Broadtop Butte, and Copper World prospects in the future.

1. If Augusta pursues the Peach-Elgin, Broadtop Butte, and Copper World prospects in the future how could their development combined with the Rosemont mine not drastically impact the scenic views?

2. If they don't plan to develop these mines in the future then will they donate the Peach-Elgin mine, Broadtop Butte mine, and Copper World mine properties to Pima County for conservation before the Rosemont mine proceeds?

Corridor management involves the preparation of a Corridor Management Plan (CMP) which must be completed as part of proposing a scenic byway for national designation. (SR83 was the second scenic road designation in Arizona) The CMP is an inventory of the corridor's existing conditions including the intrinsic qualities that attract visitors to the corridor. The plan outlines goals and strategies for preserving and enhancing the features of the scenic byway.

3. The Arizona Department of Transportation has spent a great deal of taxpayer money to perform a Corridor Management Plan for the Sonoita/Patagonia Scenic route on SR83 and SR82. A vast amount of information is available in this report. Is the ADOT consulted during the approval process and the information they have compiled considered in the approval?

4. Augusta resources makes it clear that the people of Green Valley, Tucson, and Vail will not see the Rosemont Mine. If they have future plans for additional mines in the area shouldn't they be fair to the public and inform them of these plans and their impact? The Peach-Elgin mine will clearly be visible to residents of Green Valley.

5. A group of us visited the area recently and were told by subcontractors of Augusta Resources that there is no trespassing, that it is private land. The land they were on was clearly national forest land. Does August Resources have a right to stop the public from enjoying this land? Many people travel to Gunsight Pass daily. Augusta is already constructing new roads, putting up fences and other obstacles to prevent access. Is this legal? THIS IS OUR LAND!

Economic Impact

On 2/11 2007 the Sonoran Desert Institute released their Final mining study. The study says if the mines displaced only one percent of travel and tourism-related spending in the region, the economic loss would be greater than the entire annual payroll of the mine. Augusta Resources tries to gain public approval of the mine by advertising the jobs and tax revenue for both the state of Arizona and the Fed's. Does the study take into account the loss of tourism dollars and land

Thank You

Chuck Woodford
Vail AZ 85641

Stacy Laetsch
<sandsranch@theriver . com>

04/11/2008 12:32 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont mine

to whom it concerns

my family and I - as well as my neighbors all around - will be adversely affected if the Rosemont mine is allowed to continue - Rosemont has drilled several "test" wells in our area to date and are already in the process of depleting the water table - they have no concern for people who have been living here or how their operation will affect our lives - it isn't right for industry to be prioritized over people just because they have money to line pockets - the government should support the people not the industry because if industry wins and there are no more people who is going to be in the future government? government should be responsible and accountable for creating and promoting sustainable solutions that benefit the people AND the land not a mine

please take responsibility and see that this operation is not allowed to continue

thank you

"David Carter"
<Dave@clearcanyontech.com>

04/11/2008 10:35 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont mine

To whom it concerns,

While the location is reason enough to be against this mine (I am not against mining in general), the main reason is water. If the plaque at Glen Canyon Dam is correct, mines and agriculture use 85% or more of all the water used in Arizona. The proposed mine site is a sensitive area and an enormous amount of water will be needed to accommodate the processing of the ore. The water must come from somewhere. This is a desert, we are in a long-term drought, and this is just a poor choice for any new mine, much less an open-pit mine.

Pima County and other entities have been buying up land in the area to preserve the San Pedro Cienega Creek environment, not just so we have a pretty area set aside for future generations, but to help protect a valuable water source and riparian habitat. The mine is very close to this fragile area. This is the wrong mine in the wrong place. Just look at the following statement from the BLM's own site on the Las Cienegas Conservation Area;

"**Location:** These lands are located about 50 miles southeast of Tucson. Combined, the NCA and Acquisition Planning District total 142,800 acres of public, private, county, and state trust lands. They form a scenic landscape of vast desert grasslands and rolling oak-studded hills connecting several "sky island" mountain ranges. **Cienega Creek, with its perennial flow and lush riparian corridor, forms the lifeblood of the NCA.** The area is home to a great diversity of plant and animal life, including several threatened or endangered species."

Thank you!
Dave Carter

"Ed Jones"
<edx15@hotmail.com>
04/11/2008 01:14 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont copper mine in Santa Rita mountains

Dear Forest Service:
I am opposed to the project.

I think it is more important to preserve the groundwater and natural beauty of the Santa Rita mountains than it is to allow the mine project to proceed.

I am also concerned about the amount of particulates which will be put into the air, which will cause an increase in respiratory problems.

Thank you for your attention to my comments.

Sincerely,
Ed Sloup
10080 E Domenic Lane
Tucson, AZ 85730

Tsincorona@aol .com
04/10/2008 08:44 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Comments re: Rosemont Copper Project EIS

I would like to offer the following observations and comments RE: the Rosemont Copper Project MPO and EIS:

- After reading, and being briefed on the plan for providing water for the mine operation by Augusta's consultant, it is still unclear who will be deprived of the approx. 5000 ac .ft./yr of water that will be purchased from CAP. Obviously someone in the Colorado River chain will not have access to that quantity of water. When I asked the consultant, he dismissed the question with a reference to "Nevada being the ones that will do without" (paraphrased). When I asked about a report that Lake Mead may be dry in 15 years (less than the life span of the mine), my comment was dismissed as being based on an "unreliable report". I was told that "there are better reports available on that subject". No doubt, reports more favorable to Augusta's agenda. Despite the recharge effort, clearly there will be net consumption of 100,000 ac .ft. of water over 20 years. The fact that it comes from CAP does not make the consumption go away. The way the plan as advertised is misleading.
- If CAP water is to be recharged into the Santa Cruz watershed, it seems as though there is some uncertainty where the water will end up and what aquifers will be recharged. It is common knowledge that underground water moves much like a river. It appears that the impact on local wells, in the area where Augusta plans to pump, is not well understood. The consultant I spoke to did not address this with enough confidence or clarity to convince me that there isn't a substantial amount of guess work going on.
- I was advised by the consultant that Rosemont Copper would be purchasing "surplus water" from CAP. Given the fact that we live in the Sonoran Desert, with too many private interests already pursuing projects that will require large amounts of water, I find it hard to believe that there are not many large scale projects and developments that feel threatened by the prospect of unavailable water at a later date. The concept of purchasing CAP water and the overall impact is not well understood or explained.
- The MPO indicates that the Rosemont Copper Project will make an effort to follow the Pima County OLC, but that they are not obligated to follow it. Given the proximity of Mt. Hopkins, it appears that their commitment to follow the OLC is vague, unenforceable and puts the work done at the observatory at risk.
- The transportation/trip data listed in Table 6 of the MPO was incorrect. The consultant admitted that an errata was to be issued. Depending on how you do the math, there will be large mine truck on Hwy 83 averaging every 3.33 minutes. Depending on the column used, this figure could be 1 vehicle every 17.34 minutes. <u>This does not take into account the estimated 124 daily van pool trips by employees.</u> When I asked the consultant whether there was any plan to mitigate the congestion or damage done by the traffic load, I was told simply "NO". Quite obviously this road was not constructed to accommodate this activity and presents risks to current recreational users and local traffic. Hwy is a significant recreational and scenic corridor. Regardless of the promised obscurity of the mine itself, the route will become barely tolerable to local residents and useless as a recreational/scenic corridor.
- With respect to employee trips, the MPO states "At times the traffic will be under 10 trips per hour". This statement is vague and provides no context. It's useless and misleading. If there is a point to be made, it needs to be better explained.

<u>General Comments</u>:

- Current mining laws are outdated and no longer relevant in the context of 2008 values and priorities. Referencing past activity as precedent is irrelevant and misleading.
- The USFS should not modify the Forest Plan to accommodate Augusta. My understanding is that they are under no obligation to do so.
- It is my understanding that the public comment period is underway before Augusta Resources has completed and submitted information requested by the USFS when the last MPO was rejected. What information are we not privy to at this point?
- The Rosemont Mine is in direct conflict with local residential and commercial development

(Passages of Tucson and residential development along Hwy 83 being a prime examples).

- The Rosemont Copper Mine is in direct conflict with local and recreational traffic on Hwy 83. Mine traffic is not compatible with current and other planned usage.
- The Rosemont Copper Mine is in direct conflict with the Pima County Sonoran Desert Conservation Plan.
- The Rosemont Copper Mine is in direct conflict with local astronomical observatories.
- The Rosemont Copper Mine will have a logistical impact that seems out of proportion to the 494 jobs it is estimated to provide. This will not be a major employer.
- The Rosemont Copper MPO addresses the impact of Augusta's activities exclusive of other proposed mining activity along the same corridor. (e.g., Davidson Canyon). **No mining activity should be permitted until the cumulative effects of all proposed mines are evaluated in aggregate.**

Respectfully submitted by,
Tom Schmidt
Corona De Tucson Resident

Planning your summer road trip? Check out AOL Travel Guides.

"Roger Tanner"
<rogertanner@cox .net>
04/10/2008 08:21 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Improve the Rosemont Mining Plan

One of the drawbacks of the Rosemont Mining Plan is the use of a relatively small 2 lane highway (highway 83) to tranport ore concentrate from the mine and explosives, fuels and other materials to the mine. These will average 1 load every 3 minutes per the mining plan. This is 20 trucks/hour or 240 trucks per day. This is too much traffic for this small highway. The mine should put in a railroad spur from the line along I-19 traveling over to as close to the mine as possible and then truck the supplies over the mountain via the secondary road. This way all the traffic will be off the roads and only a few trains a day will handle all the traffic at a much lower fuel cost. Every 4 trucks will fill one hopper and so a train of 60 cars will take 240 trucks to fill. This is 12 hours of operation for the mine. So there would be two trains a day or so. This would not add the traffic load to Highway 83 nor to I10 or I19. The mine could get either the UP to run the line or have the Port of Tucson run it. Trains are 10 times more efficient for moving this high volume of material, saving a large amount of diesel fuel, and they would not clog up the Highway with the trucks. This would also eliminate the noise impact of the mine traffic on the highway.

Roger Tanner
15393 E. Hillton Ranch Rd.
Vail AZ 85641

"John Jensen"
<jsjcactus@cox .net>
04/10/2008 07:31 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Opposition to Rosemont Mine

I'm writing to ask you consider my opposition to the proposed Rosemont copper mine in the Santa Rita mountains.

After seeing a news piece on KUAT, I'm even more opposed to it. I urge you to consider the potential negative impacts and lack of benefit of the mine to the residents of southern Arizona and take any action you can to oppose this mining effort.

Reasons for opposing this mine:
1. The natural beauty of the Santa Rita's will be ruined. This area is a rich in natural diversity and needs to be preserved for our children and grandchildren and for nature itself.
2. This mine will be an utter eye sore to the wonderful Santa Rita mountains and an absolute waste of the National Forest area that adjoins it. The mine will be visible from a scenic road route, trucks and heavy equipment will flood the area. Tourism could very well be negatively impacted in the Senoita/Patagonia area.
3. The Madera Canyon area is heavily supported by bird watchers every weekend, what will the impact be when blasting and heavy trucks enter the area? My guess is, there will be a negative impact to birds, not to mention the noise and dust.
4. Most of the copper will be exported to other countries and not used/sold in the U.S. How is this a benefit?
5. The number of jobs and economic stimulus is not worth it.
6. I see this as corporate well fare to en-richen a company and provide little benefit to us.
7. The roads in the area will be used heavily by mining trucks; dust, road deterioration. Who will pay for this infrastructure maintenance?- probably taxpayers
8. The mine company says it will attempt to use or obtain CAP water to support the 1.5 billion plus gallons of water usage per year. If the CAP isn't available it will tap the ground water and recharge the Green Valley water supply w/ CAP water. As we all know there were concerns with using CAP water for consumption years ago in AZ. The concern was contaminants. These concerns lead to a policy of not using it for consumption, only agriculture.
9. We all ready have a huge mine (ASARCO) mine in Sahuarita/Green Valley. The argument the company is making, that the copper is needed, is false and by itself not a justification for ruining such a precious area.

I see this mine as a self serving act of a company that is obviously only concerned with quickly cashing in on fast rising copper and commodity prices/demand.

Please, I urge you to help in any way you can. I've been a resident in Arizona for only 8 years, but from day one upon moving to Arizona I've appreciated and been amazed at the beauty the state holds. The Augusta Resource Corporation certainly does not have our citizens best interest in mind and certainly doesn't see the area for it's true value.

Sincerely,

John Jensen

Ccook520@aol.com
04/10/2008 07:09 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Stop the Rosemont mine - Save the Davidson Canyon

PLEASE STOP THE MINE --

CHARLOTTE COOK
16755 S. OLD SONOITA HWY
VAIL,AZ 85641
520-777-4877
CCOOK520@AOL.COM

HEALTH: Too many issues to discuss in this small format provided...

WATER: There is a **great potentiality** that toxic heavy metals and other chemicals into ground and surface waters draining into Tucson area water supplies, and impacting nearby riparian areas such as Davidson Canyon. This would also imperil important wildlife habitat and future drinking water sources for residential use. **More health issues here also...**for us all!

AIR: Air quality in the National Forest and surrounding residential areas will be degraded by both dust and truck exhaust associated with mine operations. **Again, health issues.**

NOISE: Daily blasting is required to remove rock (or overburden) covering the ore body. The impact to nearby residences, wildlife and recreational users in our National Forest will be equivalent to daily sonic booms....**and HEALTH?**

LIGHT POLLUTION: We no longer have the peaceful black skies our ancestors so enjoyed, due to the light wasted up into the night sky. It provides no useful lighting, wastes significant amounts energy, and threatens astronomical research. All of our observatories will suffer with another 24/7 mining operation!

SCENIC VIEW: Travelers along Scenic Hwy 83 are currently treated to a sweeping panoramic view of the Rosemont Valley at an overlook spot. The mine site dominates this view which currently consists of rolling hills of grasslands, dotted with oak trees and backed by a rugged ridge line. **Mental health?**

TRAFFIC: Mine traffic, including ore trucks and vehicles carrying heavy construction equipment and explosives for blasting, will share the narrow, winding Highway 83 with school buses, commuters, motorcyclists, bicyclists, and tourist traffic. **Dangers to health!**

PROPERTY VALUES: The areas south of the mine site have developed into high-end rural residential ranches and gorgeous homes. An open pit mine will severely impact the quality of life and reduce property values in those areas, **financial health...**

RECREATION: The Rosemont Valley is heavily used by mountain bikers, hikers, off-highway vehicles, bicyclists, hunters, camping families, beautiful trees and places for our children to run and know nature. Would you take YOUR family to camp and hike by an open pit mine? **Mental health here???**

WILDLIFE AND WILDLIFE HABITAT:
The Santa Ritas are recognized for the biological values and are an Important Birding Area (IBA). In addition, the Sonoran Desert Conservation Plan lists part of the area around Rosemont as part of the Biological Core. And what about our priority vulnerable species including two Endangered Species: the Lesser Long-nosed bat, & the Pima Pineapple Cactus? In addition species are known to occur there: Chiricahua Leopard Frog, listed as threatened, and the Yellow-billed Cuckoo also a candidate for listing.
According to the AZ Game and Fish Department , also the Mexican Long-tongued Bat, Western Red Bat, Lowland Leopard Frog, the Giant Spotted Whiptail Lizard, Rufous-winged Sparrow and Bell's Vireo, are all in danger. The Mexican Spotted Owl may also occur there, based on its habitat requirements. **Health again...**

ECONOMICS: A recent study by the Sonoran Institute shows that a mine at Rosemont would have serious economic impacts to the surrounding communities. **Mental, physical and financial HEALTH!**

The report found: "...if the proposed Rosemont mine operations displaced only one percent of travel and tourism-related spending in the region, the economic loss would be greater than the entire annual payroll of the mine," Joe Marlow, senior economist with the Sonoran Institute. Most of the benefits would go to the Tucson area, while most of the **costs**, such as decreased tourism revenue, **would be borne by communities near the mine**" **Once again, Mental, physical and financial HEALTH!**

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In the past three years, our community has fought for the protection of biologically sensitive Davidson Canyon, under threat from mining interests that would deplete water and replace our canyon with a 700x400x200 foot pit. Protecting Davidson Canyon, which feeds Las Cienegas preserve, has been the focus of numerous unanimous resolutions by our Pima County supervisors, led by our own Ray Carroll, and most recently championed by Supervisor Sharon Bronson.

All of these efforts are desperate, uphill attempts to preserve this gem, as ultimately the decision to grant mineral leases on these lands falls squarely with our State government. The State Land Commissioner and the Governor's Environmental Policy Director have repeatedly contended that their "hands are tied", and there has been no provisions for public comment. (Contrast this with the Rosemont mining controversy, which involves federal processes containing stringent guidelines for public comment and
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environmental reviews).

A recent development, however, has afforded the Governor's administration an opportunity to show environmental leadership in an area where their hands are presumably not tied. Davidson Canyon has been nominated for protection as one of the "Outstanding Waters" of Arizona. All indications are that this designation is on track, and will be formalized in the next few months by the State's Department of Environmental Quality (ADEQ). Assuming that no backroom politics derail this process, Davidson Canyon will finally receive a modest set of well-deserved protections.

All arcane jurisdictional and bureaucratic technicalities aside, there is a simple message here. Our Governor would be well served to use the resources of her ADEQ and heed the will of this community: Protect Davidson Canyon now!

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[1] Mining as a Driver to Our Local Economy
Copper mining is an absurd and abominable use of our precious federal lands. I challenge Rosemont Copper to go against any eight-grader with a spreadsheet and show a net gain to the local economy for a period greater than fifteen years. I believe that when all factors are taken into account, the only parties which will accrue any significant earnings from this audacious rape of the Santa Ritas are Rosemont executives, their highly-paid PR consultants, and their media buyers. Certainly not the surrounding community (which you may have noticed has opposed mining in the Santa Ritas for two decades now.)

[2] The Strategic Value of Copper
Whale oil was once indispensable -- now replaced by petroleum, soon to be replaced by hydrogen. As masters of speculative buying, I am surprised the the Rosemont team has so little faith in Adam Smith's "invisible hand" which guides market forces, determines prices on a scarcity-based model, and provides market incentives for substitutes. We heard the same drivel from AZ Cal Portland (who is trying to mine limestone in Davidson Canyon), but it turns out that the limestone scarcity that they bemoaned was completely offset by -- oops! -- their undisclosed 6,000 acre mineral leaseholdings in Yavapai County. This is a bogus, fear-based model, and we do not buy it. Copper is a global commodity, and Rosemont copper is more likely bound for Shanghai rather than Show Low.

[3] Water: Outstanding and Otherwise
Tailings from this ridiculous project would eventually pollute Davidson Canyon and Las Cienegas, both of which qualify or are currently registered with ADEQ as "Outstanding Waters" of Arizona. Any activity which threatens the quality of these perennial desert streams is categorically illegal. Therefore Rosemont is illegal. We and or the state will sue the EPA and other jurisdictional bodies under these provisions if this project goes forward.

[4] Intent and Accountability
There is a real possibility that Rosemont does not actually intend to mine, but is acting as a speculative holder of these assets. Meanwhile, millions of dollars of public money are being spent on this bizarre charade. As taxpayers, we insist that an accurate and complete accounting of the costs related to Rosemont be made public on a quarterly basis and that these costs are rolled into the cost of
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the lease applications.
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I write today as a parent, resident and constituent in Southeastern Pima county who is dismayed and literally outraged at the State Land Department's decision to tender mineral leases in Davidson Canyon (renewal of the Seel and Cal-Portland leases) against the will of the community. I would request/demand transparency at the State Land Department level. Our position here in the Empire-Fagan Valley, your constituents; WE OPPOSE ALL MINING IN OUR COMMUNITY ! ! !

How many environmental pollutors can be crammed into our district? Do you understand that there could be 4 operating mines within 15/20 miles of our home. 3 on state land, Seel, Cal-Portland, and Andrada, 1 shared on federal lands, Rosemont.

We are all privileged to have our quality of life here on "STATE SCENIC ROUTE 83". What is so "Scenic" about the noise, pollution and destroying wild life habitat for so many species? We would certainly hope that the State would protect, NOT SELL OUT, one of their own designated scenic routes.

We moved to back to Arizona to retire here. Took our hard earned money and paid cash to buy land and build a home.
--What happens to my home values when I have NO WATER?
--Our permit fees alone were about $9,000. to build here.
--We have performance horses, who will pay for our horses when it go's through the fence, from the blasting?
--Even more important, when my daughter get hurt working her horses and they spook from blasting ! ! !
--What will this do to our water and the water that runs down the Davidson Canyon to feed the Vail area?

Economics: The economy of Southern Arizona/Pima Co. is dependent upon the continued attractiveness of this part of the State as a good place to live. Arizona led the nation last year as one of the fastest growing state in the nation and residential home building has been a top producer of tax revenue for the State. The area surrounding the proposed quarry site has been identified by the Arizona Daily Star as one of the fastest growing high value residential areas in the Tucson valley. Property value in the area have rapidly appreciated over the past ten years and the property tax levies increased accordingly. An open-pit limestone quarry at the
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proposed site will damage this area. Substantially diminishing property values. The blasting, dust, noise and heavy truck traffic will reduce current values substantially.

Environment: The Davidson Canyon is designated a Natural Preserve and has been studies extensively over the past 10 years, with the consensus that this area be protected. The highway serving the area is designated as an Arizona scenic highway and leads to major tourist attractions, Elgin, Sonoita, and Patagonia, from there on to Nogales and Tombstone. Pima County just purchased the Bar V Ranch in order to preserve open/scenic attractiveness in the area.

Wildlife: Davidson Canyon is a wildlife corridor connecting the Empire Mountains in the south to the Rincon Mountains in the North. And with it's perennial water flow this riparian is vital to native wildlife along with the needle-spined Pineapple Cactus and Whiptail Lizard. The Davidson Canyon is widely recognized as a major contributor to the continued health of the water aquifer in the Tucson Basin. With the proposed mining operations sitting directly on top of water fault lines and leaching minerals, many of them toxic going into our water. Wells used by local home owners have a high probability of being impacted. Noise, blasting, dust and truck traffic will diminish the quality of life in the area. Blasting and the resulting earth tremors will spook my horses/cows, domestic pets and wildlife.

Respectfully,
Charlotte Cook
16755 S. Old Sonoita Hwy
Vail, AZ 85641
520-777-4877

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Published: 04.06.2008

This time, mine-plan meeting is orderly

By Josh Brodesky

ARIZONA DAILY STAR

VAIL — This go-around there were no walkouts or demands to be heard about the proposed Rosemont Copper Mine.

For Saturday's forum at Cienega High School on the proposed mine, the crowd kept the peace and played by the rules, which was a step up from a few weeks ago when U.S. Forest Service officials walked out of a similar forum after it dissolved into chaos.

But just because things were copacetic doesn't mean anything has changed. Almost all of the several hundred people who attended the meeting were against the proposed mine.

Rosemont Copper wants to develop an open-pit copper mine on a combination of public and private land in the Santa Rita Mountains, southeast of Tucson.

But a coalition of environmental and community groups has rallied against the plan, and Saturday afternoon they manned booths outside the forum.

Volunteers armed themselves with handouts and a PowerPoint presentation showing their interpretation of how the pit will look nestled into the heart of the Santa Ritas.

For the most part, though, the volunteers were preaching to the choir. "I'm against it, that's for sure," said Dieter Schaefer, a resident of Green Valley. "I love the Santa Ritas. I love to hike there. I don't want to look at another copper mine."

"I'm generally opposed to drilling a mine in a location like this," said Steven Rooke, of Vail. "It's pristine national Forest Service terrain."

The Forest Service has plans for two additional open houses and will follow those with three meetings across Southern Arizona. The agency will then take the public comments to shape an environmental impact statement, which will probably take at least a year.

Water use the chief concern

Chief among the public concerns is water use. The mine's plans call for 100,000 acre-feet of water over the next 20 years. But there are also concerns about traffic, environmental contamination, dust, noise and destruction of a pristine environment.

"There are a lot of pretty places," said Jamie Sturgess, vice president for Rosemont Copper. "But there are only 14 other places in the country that have this much copper."

Copper is in demand, Stur-gess said, and it has to come from somewhere. To ease concerns of those who live near the proposed mine site, Sturgess said he is willing to give tours.

And the mine is designed in a way to shield it largely from the view of nearby residents. As for water, he said the company plans to pipe in 105,000 acre-feet over the 20 years. And he highlighted the potential for jobs.

"My take is that people fear change," he said. "What people are afraid of, most of the people are afraid we are gong to build a new mine that looks like it was from 50 years ago."

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."

- *Contact reporter Josh Brodesky at 807-7789 or at jbrodesky@azstarnet.com.*

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"Cary Awbrey"
<gator9111@gmail.com
>

04/18/2008 09:31 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Mines

Dear Sir or Madam;

I would like to restate the concerns of my neighbors and friends, such as: water its availability and toxicity, visual obliteration to one of the few scenic highways around Tucson, and increased traffic on an already narrow deadly road.

I would also like to state that it is the residents that will be assuming the burden for a company purely motivated by profit. We as residents, without any choice in the matter, take on many financial burdens with the introduction of these mines, beginning with the water. These issues become financial when we have to purchase every ounce because water is not available or it is too toxic to consume. We will again face another financial burden with the decrease of our property value. Yet again, we assume more financial responsibility with the increase in vehicle maintenance caused by the decrease in road quality from over use and the damage from the debris left behind or flying off of the heavy equipment. Other traffic problems we face are safety issues. As the traffic increases so does our risk. Our narrow twisted road becomes a deadly game of chance as we come and go.

Last but not least, I would like to bring up the area's precious wildlife. Already with the unfortunate urban sprawl the wildlife has been forced to survive on a fraction of the land that they need to survive. With this mine, they will be forced to forage in populated areas. Again, this increases the risk to residents as well as the risk of injury or death to the animals. The Santa Ritas are home to several threatened and/or endangered species. If the U.S. Forest Service won't protect them who will? With the tainted water supply that is sure to follow, and the impact upon their environment they will be the hardest hit.

Is any of this really necessary?

I hope my comments help make a difference.

Respectfully,

Cary Awbrey

"Joyce Catalfamo "
<jcatalfamo@cox .net>
04/17/2008 05:52 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont Mine

I am greatly concerned that an enterprise such as the Rosemont Mine will use already scarce water resources. Ground water in Tucson and surrounding areas is being pumped faster than it can be replenished. A pipeline to Green Valley to capture CAP water is unrealistic given the fact that CAP water is also becoming scarce because of drought and increased population along the Colorado River. Green Valley Water District already provides water to the mines in the area as well as the pecan groves, which are water guzzlers.

A secondary issue is the scarring of beautiful pristine land. Current attempts to reclaim the land that have been used by mines in Green Valley are totally unsuccessful. What is visible to everyone who lives here is the tailings and soil mounds left by the mines. In addition, the wind blown dust from the tailings is unhealthful and a nuisance. How can reclamation attempts by Rosemont have any greater success than those pitiful efforts in Green Valley?

Joyce Catalfamo
Green Valley, AZ

altamyron@aol .com
04/17/2008 12:05 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Proposed Rosemont Copper Project

We are unable to attend your Hearings and Open Houses concerning the copper mining project in the Rosemont area, but we did attend an earlier meeting at the Green Valley Community church and wish to again send our urgent request that you keep our Santa Rita forest lands free of copper tailings and roads. It has been our joy to view the mountains from the road driving to Sonoita, and hiking throughout the Helvia and Rosemont area with the Green Valley Hiking Club many times during each year. Our birds and wildlife are being threatened from all sides in this wonderful Sky Island. Keep this land green and filled with a multitude of biodiverse creatures for our grandchildren. We hope you will honor the wishes of the residents of Green Valley and Sahuarita. Sincerely, Alta and Myron Sailer, 1529 W. Calle Hacienda, Green Valley, Arizona 85614. Members of the Green Valley Hiking Club, Tucson Audubon, and the Friends of Madera.

Get the MapQuest Toolbar, Maps, Traffic, Directions & More!

mandy vernalia
<mandy@nhvt.net>
04/17/2008 08:55 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine

Ladies and Gentlemen,

I live in Green Valley, but cannot attend the meeting in Sahuarita next week, nor the hearings that are scheduled for next month, but I wanted to voice my opinion. As a local person I am very concerned about having yet another mining eyesore on the horizon.

First off, I am concerned that the proposed Rosemont Mine will not comply with the updated mining regulations that are due shortly from Congress. If mine approval could be postponed until the new regulations came out, at least we would have a mine that was truly above minimum environmental standards.

Also I just realized that the mine will be a tremendous eyesore when viewed from magnificent Gunsight Pass, which the proposed operaton will be quite close to. This is a beautiful area and undoubtedly will not be quite as scenic once we have the huge pit and the even more huge tailings pile. On a Proposed Rosemont Mine map I saw, the pile looked to be not just awfully tall, but to cover an enormous area. I believe the pit is to cover 1000 acres, and the tailings will cover many times that.

I do not understand what we locals will get in exchange for losing our natural beauty. The few hundred jobs that may be created, won't reimburse us for that, for the billions of gallons of groundwater that will be required, nor for the increased traffic and wear on our country roads. I think the Rosemont Mine is a terrible idea.

Thank you for considering my opinions.

Mandy Vernalia
1342 West Placita Salubre
Green Valley, AZ 85614

Apurcell8@aol.com
04/16/2008 04:34 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemount Mine

I hope you will consider the scenic beauty of remote canyons, wildlife habitat, hiking trails, native plants and ecosystems in the decision to open an open pit copper mine.
I am an avid hiker, and do not wish to have noise pollution, light pollution, water contamination that the mine would create.
Mary Lou Purcell

"Beverly J DeLong-Tonelli" <beverlyjdlt@cox .net>
04/16/2008 04:23 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Opposed to Rosemont Mine

To whom it may concern:

As a 15-year homeowner in Green Valley, I am extremely concerned about the further depletion of groundwater in the aquifer, which would be guaranteed and hastened by the proposed Rosemont Mine. The Rosemont proposal to provide Sahuarita and Green Valley with reclaimed Colorado River water while the mine uses groundwater is not acceptable.

In addition, I am mightily disturbed by the 19th century eagerness of the Forest Service to approve mining projects that are harmful to our fragile 21st century environment and wildlife, especially for a mining company that isn't even owned by U.S. interests.

I urge slow and deliberate efforts to study all aspects of this foreign application, and, most importantly, to listen to public input.at well-publicized public hearings.

Yours truly,

Beverly J. DeLong-Tonelli
3591 Via de la Ciguena
Green Valley AZ 85614

""
<kovianak@earthlink .ne
t>

04/16/2008 02:37 PM
Please respond to
kovianak

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine Proposal

April 2008

Dear Coronado National Foresters and Augusta Mining Corporation:

We moved into southern Arizona in appreciation of it's rural, quiet natural beauty, which does not include an open pit copper mine off of highway 83 on public land. We are already suffering increased commercial truck traffic on highway 82 as a result of NAFTA and increasing trucking from Mexico. Traffic is noisy. We know that a mine will increase the need for better roads and increase the traffic. We are against that.

Our National forests belong to the citizens of the United States not Corporations that hold sway in Washington and a Congress that has not changed mining laws to reflect the wishes of the citizens of this country. I don't know one public entity in Arizona that has come out in favor of this mine. We do not want the limited water resources of Arizona going a mining operation nor the degradation of machinery to our mountains.

We will be attending the open meeting at Elgin School where we are hoping that grassroots democracy will hold sway.

You will know us when you see our sign "WE SUPPORT THE LIZARDS, LIONS, LOVERS OF QUIET RURAL SOUTHERN ARIZONA".

Sincerely,
Donna Lee and the Rev. Sam Wright

Steve_in_Arizona
<nitroxer2003@yahoo.com>

04/16/2008 01:36 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine NEPA Scoping. Effect on Roads and Transportation Safety.

Comment for NEPA Scoping

I attended the NFS/Rosemont Mine Scoping meeting at Vail, AZ and was left with concerns regarding the Rosemont Mine plans as affecting the public safety.

I questioned the Rosemont representatives regards their use of roads and bridges thinking the truck traffic from Rosemont could pose a safety hazard to roads, bridges, and other public traffic.

When I suggested Rosemont should consider the effect their trucks might have on roads and bridges; and consider routes and times of travel based on avoiding peak travel and load-limits on bridges, I was told Rosemont had the right to use all transportation routes when ever they wanted and without consideration for what their trucks did to the road or the potential degradation of bridges.

Specifically asked a hypothetic question, "If Rosemont trucks harmed a bridge and contributed to a school bus accident what would be Rosemont's responsibility for this?" The Rosemont representative told me, "That would not be Rosemont's responsibility; the responsibility, should an accident occur would rest with ADOT."

Asked about a special levy on Rosemont to pay for the damage they might cause their answer was, "We pay taxes like anyone else. Rosemont would be against any restriction of truck traffic and we don't feel we owe more than those taxes."

Comments Regards SR83 Current Concerns, Made Worse Should the Rosemont Mine is approved:

1. Highway 83 is already congested due to over-size vehicles (Big-rigs, trucks in the 60,000 lb load range or higher.) Occasionally, the Highway Patrol is caused to direct traffic stops due to these trucks. There currently is no designation on this route which prohibit trucks or times these vehicles can travel. (The ADOT yearly maintenance budget for damage from trucks under normal circumstances is about $20,000,000; and, so far we have not been told if SR83 will have special inspections or if there will be increases in the ADOT budget to supplement repair of this route due to extraordinary use by Rosemont's trucks or the trucks of Rosemont's suppliers. ADOT needs to answer this issue and that answer needs to be part of the NEPA process.)

2. According to people who live in the Vail area Vehicles who need to detour

from the low bridge East of 83, on I-10 currently encounter wide loads which have required them to pull over to the side and stop.

3. School bus traffic on SR83 is busy M-F during the hours 6:00 a.m. to 8:30 a.m., 11:00 a.m. to 12:00 p.m. and from 1:00 p.m. to 6:00 p.m.; after questions were asked Rosemont regarding voluntary restrictions of their use of SR83 during the hours, I was told they have a right to this road to use as they want, whenever they want to use it.

4. SR83 is dangerous and winding. Due to this the road should be upgraded and marked to decrease safety problems which would be caused by slow moving trucks and trucks throwing rocks. (Passing lanes for passenger cars to pass trucks are already needed; as well as better marking of hazard points in the road for both cars and large trucks.)

5. From what Vail residents tell me the I-10 Marsh Station Bridge needs up-grade to decrease current over-sized loads re-routed to SR83; or, Rosemont's trucks will also have to compete with current heavy truck traffic on SR83. (i.e. SR83 is already dangerous; addition of additional heavy trucks from Rosemont will increase the danger and risk lives).

6. the Federal Highway Safety Administration information from the Arizona 2007 Five percent report which outlines the top 5 percent of its locations currently exhibiting the most severe highway safety needs be taken into account when determining SR83 safety. Their data needs also needs to be included in the NEPA Scoping.

7. All bridges and roads where possible large truck travel need to be well marked with load limits; this is not currently done in many locations; or, if load limits are posted they are sometimes posted distant from the bridge to be crossed.

8. According to Vail residents, the intersection of I-10 traffic, frontage road traffic, and old Sonoita highway traffic is currently very confusing. This interchange needs to be redesigned to handle the large increase in traffic volume or truck traffic needs to be routed away from this area. This may require bi-pass, widen of the road, or the planning and construction of a new interchange.

Please reply regarding receipt of this NEPA Scoping Concern statement.

Dr. Steve Chrisman
Sahuarita

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

"Jesse Wood"
<ojwood@msn.com>
04/16/2008 11:22 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject:

Greetings,

I am writing to voice my opinion on the Rosemont Mine. I have watched this issue develop over the past 13 years, and as a geologist working in the natural resource field, I am familiar with the issues surrounding the purposed development. To be brief, regardless of the projected tonnage of precious metals to be extracted, the several hundred jobs created, and numerous other economic benefits to be had from this project, it still represents short term gain and long term loss to Pima County, Arizona, and this country. Augusta estimates an 18.2 year lifespan of the project, but I have not seen any estimates on how long it will take some 3,400 acres of Coronado National Forest to recover from a 750 acre, half mile deep open pit mine. It is the wrong project in the wrong place at the wrong time, and should be permanently shelved as soon as the process allows. Period.

Jesse Wood
5630 N. Genematas Dr.
Tucson, Arizona 85704

"Jan Connors"
<jconnors@powerc .net
>

04/16/2008 11:05 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont Mine

I believe the USFS has an obligation to protect public lands from the damage rendered by mining. One only needs to look at Morenci, Green Valley, Globe and Bisbee to envision the impact of copper mining on the beautiful Santa Rita Mountains.

Hwy 83 is designated a scenic highway and a mine and the related traffic and pollution would affect the beauty of the area. There are serious water issues in the Tucson region which must be considered. Although Augusta promises to conserve and replenish water, it is still coming from someplace and there is an impact to the environment.

I camp and ride horses in the Santa Rita Mountains and I strongly object to this plan.

Regards,

Jan Connors
Benson, AZ

Anthony Strungis
<astrungis@yahoo .com
>

04/16/2008 09:47 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Copper Mine

To Whom It May Concern,
My wife and I are opposed to the Rosemont Mine being allowed to operate. Water in this area of Green Valley is a precious resource and finite. If the mine is allowed to operate for the next 15+ years, it will have a terrible effect on our residence
Tony Strungis
5811 S. Atascosa Peak Drive
Green Valley, AZ 85614

Tony Strungis
Green Valley, AZ

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http://mobile.yahoo.com/;_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

adele youmans
<adeleyoumans@yahoo
.com>

04/16/2008 09:41 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Proposed open-pit Rosemont copper mine

Dear Sir or Ma'am,

I'm writing to express my strong opposition to the proposed open-pit Rosemont copper mine for several reasons.

The availability of water in the area is uncertain and an open-pit copper mine would only exacerbate the problem. Using CAP water seems unrealistic as this source of water from the Colorado River is also uncertain, given the demands of the growing populations in the areas that use it.

Highway 83 (designated a scenic highway) is a narrow, winding road that simply cannot bear use by huge vehicles from the mine as well as regulr traffic without causing real danger to anyone who travels on it.

The impact to the environment and wildlife would be catastrophic.

Instead of permitting an open-pit copper mine to operate in an area of outstanding natural beauty, may I suggest instead a copper recycling plant in the Tucson area, thus avoiding the permanent devastation caused by open-pit mining?

Yours faithfully,
Adele Youmans
2841 N. Melpomene Way
Tucson
Az. 85749

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know-it-all with Yahoo! Mobile. Try it now.
http://mobile.yahoo.com/;_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

"James Kramp"
<jimkramp@msn .com>

04/09/2008 07:48 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc: "Mary ann Purcell" <mary_anng@msn.com>, "Jilll Hall" <jd3hall@comcast.net>, "GAIL EVANOFF" <TTAWESOMEOFF@netscape.com>, "Ed Hardoin" <ed.hardoin@sbcglobal.net>, "gayleamcguire" <gayleamcguire@msn.com>, "Don Schemers" <dschemers@yahoo.com>, "HALL Dennis" <Dennis.Hall@comaupico.com>, "Rebecca" <rebecca_parton@msn.com>, "Maldo" <Francisco.Y.Gonzalez@hp.com>, "kathleen schemers" <kschemers@yahoo.com>, "SUE HARRIS" <mntncats@hughes.net>, "Dennis Hall" <jd3hall@msn.com>, "tsonnen1" <tsonnen1@ford.com>, "Kathy Fredrickson" <tickdinsb@yahoo.com>, "Paul Bagnel" <paul.bagnell@att.net>, "jackisenberg" <jackisenberg@msn.com>, "JIM & LIZ WALKER" <MINERVA311@JUNO.COM>, "Bonnie Isenberg" <bonnieisenberg@msn.com>, "JACK & LINDA PENNINGTON" <JAYSOFTUCSON@MSN.COM>, "mary Ginter" <maryginter@earthlink.net>, "Kris" <edbducks@hotmail.com>, "SANDRA MARTEL" <BOXER_CHICK_39@HOTMAIL.COM>, "tim Bee" <tbee@azleg.gov>, "Brian Giese" <bjgnekoosa@gmail.com>, "Elizabeth Webb" <vailaz@hotmail.com>, "Larry Eaglen" <leaglen@azwildblue.com>, "Sue waters" <swaters@Tep.com>, "boxcarbud12" <boxcarbud12@cs.com>, "abenson55" <abenson55@comcast.net>, "Marc and Sue Flynn" <marcflynn@att.net>, "carwell" <carwell@wildblue.net>, "homeandranch" <homeandranch@gmail.com>, "bohica" <bohica@dakotacom.net>, "gccats" <gccats@azwildblue.com>, "Carol Mack" <Carol_L_Mack@raytheon.com>
Subject: Rosemont Mine NEPA study question

Will the Federal Highway Safety Administration information from the Arizona 2007 Five percent report which outlines the top 5 percent of its locations currently exhibiting the most severe highway safety needs be taken into account when determining SR83 safety? http://safety.fhwa.dot.gov/fivepercent/07az.htm

Thanks

Jim Kramp
520-762-8345

Jerri Gentile
<jerriaz@msn .com>
04/09/2008 07:11 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Copper Project Comment

PUBLIC COMMENTS FOR THE
PROPOSED ROSEMONT COPPER PROJECT

Rosemont Mining mentions the Cienega creek watershed and basin, the Santa Cruz Basin and Central Arizona Project water in the mining plan report. Water is a resource in great demand. Nancy Freeman of the Groundwater Awareness League, Inc has commented as follows:

Impacts on Water:

Maintaining supplies of clean water and protecting watersheds were major reasons why public domain forests and rangelands were reserved. As regions have become more populated and States have failed to protect the valuable resource of water, the imperative for the Federal Government through the Forest Service and other agencies to protect these watersheds for their original intended use. The public can no longer dole out large quantities of water to industry, especially heavy water users such as mining and electro-power plants. If we are going to save our watersheds and the many species of plants and animals that Federal Government has to take on this project to protect the water in the national forests, wildlife refuges, and designated conservation areas.

There is not doubt that the quantity and quality of our water is diminishing year by year. U. S. Geological Survey continues to do extensive measuring and reporting on the water issue. However, they have no authority to do anything about what they conclude, neither are they able to express their opinions in any public forum or called on to testify in Government hearing. One report will suffice for your present understanding:

Ground-Water Depletion Across the Nation: U.S Geological Survey Fact Sheet 103-03, November 2003

Important reports compiled by Ann Maest and Jim Kuipers show that the Environment Impact Statements of mining corporations consistently underestimate the ultimate impact on water by mining operations. Predicted and Actual Water Quality at Hardrock Mines

Warren Nechodom a Green Valley resident is a retired chemical/nuclear engineer/manager and he commented: "IF (my emphasis) Augusta mines or dumps waste onto the northern tier of unpatented mining claims, this PROBABLY (my emphasis) would alter the hydrology and water quality of the Sycamore Canyon drainage system too, thus affecting Corona de Tucson also."

Those living near the Santa Ritas deserve guarantees against those IFS and MAYBES!

Transportation Impacts:

The main route to the mining project seems to be SR83. Rosemont estimates 36 round trips an hour, 176 round trips a day and 1,164 round trips a week. Those trips are for material only. If employees average 5 per vehicle they note about 62 round trips both AM and PM. Vendors and other deliveries have not yet been factored in their report.

SR83 is a two-lane road that many residents use daily and live near. JD Ranch (for one) is located directly off SR83. We have major concerns regarding safety, noise pollution and truck pollution. Rosemont's' report notes trucks carrying 24T of material each, with operations running 24 hours a day, 7 days a week and 365 days a year. I believe that the bridge and road were not designed for this amount of weight and traffic. Rosemont goes into great detail about roads within the proposed site. I could not find any proposals for damage caused to SR83 from this constant traffic.

Rosemont is building an access road west of the mine site. They should also build their own private road from the site intersection with SR83 that intersects I10 away from residences. In twenty years they can sell it to Pima County, as part of the I10 Bypass they feel is necessary.

Mine Blasting:

Rosemont's report indicates daily blasting, and noted that they would try to minimize off-site vibrations. Can these vibrations cause cracks in our homes foundations, walls and stucco? Who would be responsible for such damage? The explosive materials will also travel near our homes for delivery and be stored on site. The lightening strikes during monsoon season add another dimension to our safety concerns.

Mining:

In their plan report Rosemont notes that open pit mining is being investigated to determine if passive contamination will be achieved. If the land must be raped of its resources why not use In situ mining instead of open pit? The Copper Development Association wrote about In Situ Leaching:

"In situ" literally means "in place." With in situ mining, a diluted sulfuric acid and ferric sulfate solution is injected down holes drilled into the ore body. The solution flows through cracks in the rock under pressure, leaching the copper from the rock into the solution. The solution is then pumped to the surface to recover the copper, using solvent extraction techniques.
Tests show that recovery rates normally achieved with heap and dump leaching could also be approached with in situ mining. There are significant cost advantages of this operation which include: the surface need not be disturbed with anything other than pump and piping installations, no waste piles are created, start-up is relatively fast, equipment needs are reduced significantly, fluid control is more easily automated than solid batch processes, and we can mine deep, relatively low grade and complex ore bodies.

The Florence In-Situ Mine

The copper mine being developed in Florence, Arizona will leave hardly a trace after it has come and gone. The before and after photos of this desert and farmland area, will be almost the same.

How? Doesn't copper mining mean a big hole in the ground, hundreds of acres of tailings and huge waste piles, or shafts sunk deep into the earth with towering head frames?
Not if it is an in-situ mine at Florence. BHP Copper is developing the first standalone in-situ copper mine in the world. It will create jobs, protect the environment, and prove a new

technology that may open up many low grade ore bodies, allowing them to be mined at low cost with minimum disturbance.

What is Rosemont's position on different technology?

Asarco LLC filed a complaint against Augusta resource with regard to the property in Pima County (Rosemont Copper Project). No mining should be granted until the legalities are settled and ownership is secured.

Quality Of Life:

Many homes, families and individuals in many areas will be affected by mining in the Santa Rita Mountains. We chose to live away from the traffic, noise and pollution of city living to maintain a certain quality of life. We chose the open spaces, the closeness to nature and wildlife, the dark skies and bright stars. Mining in the Santa Rita's will forever change that quality. We did not move next to the mine, the mine wants to infringe upon us. Has Rosemont calculated the loss in property value for residents? Will the U.S.Forest Service, The Bureau Of Land Management, the State of Arizona and Rosemont Copper bail us out when we can't sell our homes?

A few jobs and dangling a carrot of millions of dollars in front of the schools boards will never come close to the losses incurred from this mining project. Rosemont's forecasts are based on the price of copper and operating costs. They are no positive guarantees.

JERILYN GENTILE
jerriaz@msn.com
14214 E Lazy Jake Lane
Vail, AZ 85641

Please add me to the mailing list - YES

"Mari's Useful Pots "
<m.sorri@att.net>
04/09/2008 04:29 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Copper Mine proposal

Please do not approve the mining plans of this operation.
The **laws** under which this would be acceptable are nearly 140 years old. They will most likely be updated soon and an open pit mine ruining the Santa Ritas for many decades to come, would be a shame.
The **National Forest** would be better used for hiking, wild life habitat, enjoying its beauty than for mining. Other, less scenic areas can be mined, not the most scenic.
The mine would **pollute.**It would cause air, noise, water and light pollution. It would release methane from the ground.
It would **use too much water**. We already are struggling to assure that we have enough water for the residents of southern Arizona, why should we provide it for a Canadian company.
A Canadian company would make a profit of our resources and take most of the money to Canada. This operation would not profit our **local economy.** It would offer some jobs to be sure but the cost would outweigh the gain. Our existing mega employer, Raytheon, is hiring at high paying levels. These newcomers will not want to build or buy a home where they would be looking at an open pit mine. Vail and Corona will loose these residents and their business.
The values of existing homes would decline because of the fore-mentioned pollution and loss of scenic beauty.
The **roads** in and around Vail and Corona de Tucson would be under too much stress. The heavy trucks and other machinery would destroy the small roads and make them more dangerous for the commuters.

Sincerely,
Mari Sorri and Jerry Gill
18335 S. Camino Chuboso
Vail, AZ
85641

"Gerry Lind"
<gerjan@wildblue .net>
04/09/2008 04:19 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: augusta resource corp's rosemont mine plan

Living in Sonoita has been a dream come true for my wife and I. Not only does IRS tax every thimg that we own we are about to lose a great deal of value in our home if this mining plan becomes a reality. When 300 mining vehicles per day drive back and forth on route 83 residents of Sonoita, Elgin and Patagonia will stuck in our homes. A trip to Tucson to shop for food will be a four[4] hour roundtrip. What Tucson resident in his or her right mind would travel to Sonoita for lunch and a visit to the wineries? Businesses will fold and property values will plummet. Medical assistence will require a helicopter and that now costs $15000. to go to aTucson hospital. Please Help. Gerald Lind

Ola Jane Gow
<olajane@forestweb .co m>

04/09/2008 12:29 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: The Forest Service: Permission to post

Greetings:

I am the Publisher of Forestweb, a service that aggregates news, data, and opinion for persons in the forest products sector. I have read your Guest Commentary "The Forest Service needs to let the people speak out at true public hearings" online at the Tuscon Weekly and feel that the viewpoints presented in this article would be of interest to our readership.

(http://tucsonweekly.com/gbase/Opinion/Content?oid=oid%3A108883)

I am requesting permission to distribute this editorial to the users of our information service. If you were to agree, please be assured that I will cite and give credit to you and the USDA Forest Service.

Please e-mail me back at your earliest convenience. I am looking forward to hearing from you.

About Forestweb: Forestweb is an information and technology company that delivers real-time market intelligence to clients worldwide in the forest products industry. We manage and deliver business news, data, analysis and opinion to get the right information to the right people at the right time. To learn more, please visit our site at www.Forestweb. com.

Ola Jane Gow, Publisher
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PUBLISHED ON APRIL 3, 2008:

Guest Commentary

The Forest Service needs to let the people speak out at true public hearings

By JENEIENE SCHAFFER

My memories of Forest Service and Bureau of Land Management public hearings are exiting. When called upon to speak at a wolf-reintroduction hearing, a fellow simply belted out a mournful howl. The off-road-vehicle crowd was noted for showing up in large numbers to desert-dunes and ORV hearings in T-shirts depicting splashy, vibrant visions of vehicular nirvana.

What these and other hearings had in common was this: a small index-sized card. As one entered the meeting hall the federal agency had rented for the night, potential speakers would seek out this card. Your heart pounded; a little sweat would start to bead on your forehead. *Do you or don't you? Yes, yes you will. You must.* You filled in your name and address and checked off "yes."

You would be called upon to speak out that night. What a thrilling sensation!

At one particularly charged-up hearing, I was seven months pregnant as I waddled up to the microphone. As I faced some particularly belligerent yahoos in the audience, I would not back down. This was democracy in action. This was what our heritage as Americans was all about. This was an experience I would use to teach my daughter about civic duty.

In fact, only in America could a National Environmental Policy Act (NEPA) hearing by the Forest Service or BLM transform from a dry "comment period" on "environmental-impact assessments" into a first-class, town-hall-style open public discussion. And were those rooms packed! This was public land at stake, after all, and the public must be heard. Costumes, signs, tables with literature, songs and the electricity of excited and engaged citizens tangibly tingled the air. No matter what "side" you were on, you were *on*.

So you can imagine my concern when I attended the March 18 Coronado National Forest NEPA hearing on the Rosemont mine proposal for the Santa Rita Mountains, in Tucson. After the birth of our daughter, my husband supported my decision to take a few years off, and I took a break from several hearings. On March 18, I was in for a shock: There would be absolutely no public discussion. There would be no standard Forest Service slide-show presentation to educate and inform before taking questions. When I raised my concerns about this, I was told to fill out the comments sheet and turn it in. And that was that.

At the Green Valley hearing on March 19, the Save the Scenic Santa Ritas group was not even allowed to set up a table.

Finally, at the Patagonia hearing on March 20, the police swooped down on the predominantly senior-citizen crowd. A 70-year-old gentleman raised himself on the stage and asked for a chance to speak. The chief of police immediately approached him. The Forest Service hastily packed up their displays and rapidly left with the Rosemont mine

epresentatives. Soon, a number of local police, sheriff's deputies and Border Patrol agents arrived at the school responding to a call of "civil unrest."

Well, I filled out my sheet, and here's what it said:

"NEPA scoping hearings must again allow for ample and generous opportunities to speak publicly. Fair and democratic due process of changes occurring on public land must allow for open and public accountability that mere written comments cannot provide on their own. Media must also be there to record all sides of issues raised, and the Forest Service itself must provide a general presentation to the public. Federal political leaders recognize the importance of town-hall-type meetings, and the Forest Service must again remember and implement the intent of democratic public meetings: the opportunity for open and fair debate."

I am awaiting the return of the index card. I will check off "yes" with my daughter at my side. I will look at her and say, "This is what democracy looks like."
Jeneiene Schaffer is the campaign coordinator for the AZ Mining Reform Coalition. She encourages others to tell the Forest Service to allow fair and open debate at NEPA hearings. Send comments by e-mail>, or mail to USDA Forest Service, Coronado National Forest, 300 W. Congress St., Tucson AZ 85701, attn: Beverly Everson. The comment period ends May 19.

Recently in Guest Commentary:

- **Guest Commentary** - Pinal County officials are abusing their power by harassing a popular bar/restaurant **by JONATHAN HOFFMAN** (04-10-2008)
- **Guest Commentary** - The war may be old news to the media, but it isn't old news to the members of the public who are suffering **by GRETCHEN NIELSEN** (03-27-2008)
- **Guest Commentary** - It's Women's Herstory Month--a perfect time to honor all that your mother's done for you **by IMANI WILLIAMS** (03-20-2008)
- **Guest Commentary in the archives »**

Patrick A Mack
<Patrick_A_Mack@raytheon.com>

04/09/2008 02:22 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Santa Rita Mine Disaster

I truly think thi smine is a bad idea, here are some of my questions of concern for my families safety and well being:

1. There are already strains on the water supply coming from the Colorado River to the Central Arizona Project. One look at lake levels along the damn system will verify this. If water allocations are reduced due to lack of water will Augusta Resources guarantee in writing that the reduction in water will be absorbed by them in their allocation and not the public of Green Valley and Sahurita even if that leads to the requirement of shutting down or slowing activity at the mine?

2. If the groundwater in our area becomes polluted like the Green Valley water where, will the water for all of us living in the Sonoita/Patagonia corridor come from and will Augusta Resources guarantee they will pay all related expenses to get it piped directly to our homes?

3. Many residents in this area are on fixed income. If their wells run dry many cannot afford to have them drilled deeper. Proving that the mines are responsible for lower groundwater tables is difficult. If this becomes a problem will Augusta guarantee that they will pay for well improvements necessary to provide water?

4. Is the Cumulative effect of all of the area mines water use and contamination problems being considered in the approval of these mines?

5. In Augusta's water plan dated 5/2007 they claim that in 2007 they would recharge 15,000 acre feet in the Santa Cruz Basin. What is the status of this claim?

1. Mine blasting creates sonic booms. What times of day would Rosemont blast? If it effects nearby homes by cracking foundations and stucco, will Augusta pay for improvements that are necessary?

6. What will the mine do to assure the light pollution does not adversely impact the observatories on Mt Hopkins?

7. If it is later discovered that the lights do interfere with the Mt Hopkins observatories will Augusta Resources guarantee in writing that they will either reduce the lighting to acceptable levels, or if that is not possible to stop mining during the night? According to Augusta's lighting plan "The project, although not required to do so, will make every attempt to comply with the Pima county Outdoor lighting code. It should be noted, however, that federal and state laws also require Rosemont operations to give utmost attention to the safety of its employees and the public"

8. The School buses are on the road M-F from 6:00AM to 8:30AM, 11:00AM to12:00PM and from 1:00PM to 6:00PM. Will trucks carrying ore or explosive supplies to the mine travel on the road during these hours?

9. Will the I-10 Marsh Station Bridge be updated to eliminate the oversized loads now routed through SR83, or will these loads share this dangerous winding road with Augusta's trucks?

10. Will passing lanes be installed anywhere along SR83 to allow traffic to pass slower moving trucks?

11. How much more frequently will road maintenance be required on SR83 due to the volume of heavy trucks if the Rosemont mine is approved? Since it is a two lane highway construction has a major impact on travel times and safety.

12. Can SR83 in its present state support the loads and volume that Augusta has presented?

13. Wouldn't it be better and less intrusive on the current SR83 travelers to improve it before opening the mine so it can handle the additional volume of heavy trucks, perhaps make it a concrete highway in the sections supporting heavy trucks?

14. The Portland Cement mine approved in the Empire Mountains will also be sending Trucks onto SR83. What will the cumulative effect of Rosemont traffic and Portland's traffic have on safety?

15. The interchange from I-10 onto SR83 is not the safest. It consists of sharp curves, and an intersection of I-10 traffic, frontage road traffic, and old Sonoita highway traffic. It can be a very confusing intersection. Shouldn't this interchange be redesigned to handle the large increase in traffic volume before people die?

16. Is the Arizona Department of Transportation involved in the mine approval process to ensure proper planning to account for the increased SR83 use and safety issues?

17. Has the Federal Highway Safety Administration information from the Arizona 2007 Five percent report which outlines the top 5 percent of its locations currently exhibiting the most severe highway safety needs be taken into account when determining SR83 safety?

- If Augusta pursues the Peach-Elgin, Broadtop Butte, and Copper World prospects in the future how could their development combined with the Rosemont mine not drastically impact the scenic views?

18. If they don't plan to develop these mines in the future then will they donate the Peach-Elgin mine, Broadtop Butte mine, and Copper World mine properties to Pima County for conservation before the Rosemont mine proceeds?

Corridor management involves the preparation of a Corridor Management Plan (CMP) which must be completed as part of proposing a scenic byway for national designation. (SR83 was the second scenic road designation in Arizona) The CMP is

an inventory of the corridor's existing conditions including the intrinsic qualities that attract visitors to the corridor. The plan outlines goals and strategies for preserving and enhancing the features of the scenic byway.

19. The Arizona Department of Transportation has spent a great deal of taxpayer money to perform a Corridor Management Plan for the Sonoita/Patagonia Scenic route on SR83 and SR82. A vast amount of information is available in this report. Is the ADOT consulted during the approval process and the information they have compiled considered in the approval?

20. Augusta resources makes it clear that the people of Green Valley, Tucson, and Vail will not see the Rosemont Mine. If they have future plans for additional mines in the area shouldn't they be fair to the public and inform them of these plans and their impact? The Peach-Elgin mine will clearly be visible to residents of Green Valley.

21. A group of us visited the area recently and were told by subcontractors of Augusta Resources that there is no trespassing, that it is private land. The land they were on was clearly national forest land. Does August Resources have a right to stop the public from enjoying this land? Many people travel to Gunsight Pass daily. Augusta is already constructing new roads, putting up fences and other obstacles to prevent access. Is this legal? THIS IS OUR LAND!

On 2/11 2007 the Sonoran Desert Institute released their Final mining study. The study says if the mines displaced only one percent of travel and tourism-related spending in the region, the economic loss would be greater than the entire annual payroll of the mine. Augusta Resources tries to gain public approval of the mine by advertising the jobs and tax revenue for both the state of Arizona and the Fed's. Does the study take into account the loss of tourism dollars and land values?

tjcurley@att.net
04/08/2008 07:15 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine Comment

Attn: Beverly Everson

I am writing to say I totally oppose the proposed Rosemont Mine operation and encourage the USFS to decline Rosemont's request.

Your website has fine and noble phrases such as *"... to meet the needs of present and future generations ...", "... Caring for the Land and Serving People ...", "... Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated land."*

How is allowing a Canadian company to dig an open pit copper mine (the most devastating kind of rape of the land), extract copper, and sell it to China only to leave a scar on the land which will last for years in an area of natural beauty foster your goals? Not to mention the affect on the water table in the area.

What does it provide Americans, your "customers", except short-term, unreliable jobs?

Given your Vision, it hard to believe you are even considering Rosemont's proposal.

Again, I strongly urge you to turn down Rosemont's request.

Thank you.

Tom Curley
Sahuarita AZ

scott green
<bsazdsrt@msn .com>
04/08/2008 07:52 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont Mining

I believe that the mining laws written back in the 1800's should be reviewed before any new mining takes place in Arizona and other states. The population and the water needs today are greatly different than when these were written. The expected population growth in Arizona is going to have a big impact on all resources and they will demand more water and land to be free for recreation.

Pack up or back up–use SkyDrive to transfer files or keep extra copies. Learn how.

barbara.kingman@harrisbank.com
04/08/2008 07:35 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont

The first Chief of the US Forest Service, Gifford Pinchot in 1905 stated the following: "to provide the greatest amount of good for the greatest amount of people in the long run".

The mission statement of the US Forest Service is:
"Sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations."

The values of the US Forest Service are as follows:
Care for the Nation's forest and grassland ecosystems.
Values the varied skills and contributions of a diverse workforce.
Strives for accountability by every employee for the efficient management of the capital resources her or she uses.
Is responsive to national and local interests.
Is focused on the needs of the future generations.

Somehow the values and mission statement of the US Forest Service are not being fulfilled by the open arms policy of the Service to Rosemont Mining. As stewards of our Nations forests and grasslands the proposal to allow mining in the Santa Rita Mountains is incomprehensible. The US Forest Service has certainly not been responsive to local interests.

As uncontrolled growth quickly eats up what is left of the grasslands and Sonoran Desert, to allow Rosemont to destroy a mountain range is incomprehensible. And complete destruction it will be in spite of the assurances of Rosemont. Shame on you US Forest Service for even entertaining the idea of crawling in bed with Rosemont Mining.

It is now that the line must be drawn in the sand in order to fulfill the PROMISES made by the US Forest Service to the people of this Nation. We must not allow Rosemont to mine the Santa Ritas, we must "focus on the needs of the future generations".

Barbra R. Kingman AVP I Banking Manager - Tucson
Harris Private Bank I 1755 E. Skyline Dr., Suite 101 I Tucson, AZ 85718
(520) 577-1344 I (520) 577-3431 Fax

The opinions expressed in this email are those of the author and may not be representative of Harris Financial Corporation or any of its affiliates.

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Dave Efnor
<dave_efnor@yahoo .co
m>

04/06/2008 09:44 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Comments for Rosemont Mine

Dear US Forest Service,
I suspect most people are negative on the development of the Rosemont Mine. I feel contrary to that opinion and fully support its development. The negative view in many respects to me is NIMBY, uninformed, "go-with-the-crowd" and selfish. Our standard of living requires resources and lots of them. Is it fair to ask the rest of the world to supply this commodity (as well as many others) to us and to the relative diminishment of their environments? The short answer is "NO"!

We are now seeing the results of eliminating, or inhibiting at best, our resource development with much higher costs. Our per capita consumption of copper in the US is 20 lbs, in China it is around 2 lbs. To merely double their consumption, and there's no reason to believe they won't, there is not enough copper being mined today to satisfy that need. Of course, that demand is much greater considering India, Indonesia, Brazil and other fast developing countries. The potential result will be supply shortages, high costs and, ultimately, strong competition in lifestyle.

After reviewing the development plan, I'm thoroughly impressed with Rosemont's footprint, which appears to be much more eco-friendly compared to other open pit developments that occurred decades earlier in this State. Isn't strip coal reclamation doing a fine job for the ecology? What makes the Rosemont plan less effective?

Please add me to the mailing list for additional Rosement information.

Sincerely,
Dave Efnor
12305 E. Gold Dust Dr.
Tucson, AZ 85749
Dave_Efnor@yahoo.com

You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access, No Cost.

"Shelley Tanner"
<makingacake@cox .net
>

04/05/2008 01:54 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc: "Ray Carroll" <district4@pima.gov>
Subject: Protesting of Mines in the Davision Canyon aera and effects on homeowners.

April 5, 2008

US Forest Service, Department of Agriculture
Team Leader, Rosemont Copper Project
Coronado National Forest
300 W. Congress St.
Tucson, Arizona 85701

Dear Team Leader,

We are writing to protest the current proposals to operate mines in and around the Davidson Canyon water basin areas. We have several objections as to why these mines (especially Rosemont) should not be allowed to operate EVER in this unique water, and wildlife habitat areas:

1. We want all activity by Augusta Resource Corporation to stop at Rosemont because the NEPA process is not complete! We want the whole plan to be studied at one time and do not let Augusta Resource Corp. piecemeal this study.
2. We are extremely upset that Augusta hasn't even completed the studies and documentation requested when the Forest Service rejected their second Mining Plan of Operation; for example, the hydrologic studies impact study is not done. Therefore the impact cannot yet be determined! These impacts are one of the most significant effects of the mine in a water critical environment and they are not done! Why are you even going through this process again with Augusta when you already rejected Augusta's mining plan last July 2007 and they haven't completed the requested studies?
3. Also we are concerned that several of the parts of the mining plan for reducing the effect of the tailings and the mine on the ground water required active control and maintenance. Who will be responsible for this maintenance when the mine stops production? Will the Forest Service then maintain the dams, keep monitoring the water in the wells, and keep up the pumps and other structures that manage the water leaching from the tailings from contaminating the ground water. Who will pay for the power and to maintain the power lines to these facilities? This effect on the ground water is forever, who is going to monitor and maintain this? What is going to happen when the pumping of the water from the pit itself stops? What will happen then?
4. We request that the CUMULATIVE IMPACTS of all the new mining proposals in the area be considered in the EIS. Currently, in addition to the Rosemont Mine, there are

several calcium carbonate/limestone mine proposals in the Davidson Canyon area, and several copper/silver mine proposals in the Patagonia Mountains, Canelo Hills and San Rafael Valley. All of these mines would use Highway 83 (a designated scenic byway!) to transport their mined metals, chemicals, and explosives. Who is going to pay the additional maintenance cost on the poor highway? Pima County or State of Arizona?

5. We demand that there be NO revision to the Forest Plan to accommodate Augusta! The Forest Service should NOT revise the Forest Plan to accommodate mining. The 1872 Mining Law does not require the Forest Service to revise this plan to accommodate mining. If Augusta's Mining Plan of Operation (MPO) cannot meet the current standards and requirements of the Forest Plan, then the Forest Service MUST deny the mine.

6. We demand that Pima County, the Arizona Department of Environmental Quality, Arizona Game and Fish, and the Arizona State Office of Historic Preservation be included as "cooperating agencies," at a minimum in the EIS process.

7. We demand that the Forest Service conduct a validity exam on all mining claims Augusta wants to use for their mine waste, tailings, and other facilities. Unless these claims are valid, Augusta has no real legal right to use our public land for their dump.

8. We expect the Media to be at all public meetings to record all sides of issues raised and the FS itself must provide a general presentation to the public and media at these hearings. Federal political leaders recognize the importance of town hall-type meetings, and the FS must again remember and implement the intent of democratic public meetings: the opportunity for open and fair debate.

9. We would ask that an extension of the comment period be 60 days AFTER Augusta submits ALL information and data the Forest Service requested in their letter dated Oct. 19, 2007, rejecting Augusta's mining plan last July 2007.

We cannot express enough the deep sorrow and fear shared by our neighbor and friends to the idea of what the negative impact of mining would do to the Davidson Canyon area as well as the impact it would have on Tucson as a whole! As concerned land and homeowners, we have invested our entire life savings to live off of Highway 83 for the benefits of the scenic beauty, wildlife habitat, clean-air, and excellent water! The quality of living will change forever for us, and our neighbors; who is going to compensate us if these mines are allowed to go into operation? It would be devastating to our entire community if these mines were allowed to operate. Hundreds, if not thousands will loose their water supplies and quality of life that we cherish, appreciate and take precautions to preserve. The Davidson Canyon area will NEVER be the same!

Sincerely,

Roger and Shelley Tanner
15393 E. Hilton Ranch Road
Vail, AZ 85641

cc: Arizona State Governor Janet Napolitano
Representative Gabrielle Giffords
Representative Raul M. Grijalva

Pima County Supervisor Ray Carroll

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<droth@coronafire .org>
04/04/2008 04:42 PM
Please respond to droth

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject:

I am opposed to the Rosemont Mine.

Why should a foreign (or domestic) company be allowed to make lots of money by dumping its wastes on public land? This is a healthy, vital ecosystem and a source of aesthetic joy to thousands of people. The environmental and aesthetic costs of mining should be borne by the company reaping the profits, not externalized to nature and the public.

We do not need to lose any more wild and beautiful country so that a few thoughtless and greedy people can cash in.

Sincerely,

Doug Roth

"Jonathan DuHamel "
<jduhamel3@cox.net>

04/04/2008 03:42 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc: "Ahern Richard at work" <rahern@fs.fed.us>
Subject: Rosemont comments

As I understand it, Rosemont Copper plans to use some of its unpatented mining claims for dumping waste or tailings. Technically, an unpatented mining claim is not valid unless a discovery of valuable mineral is made on it. This issue could present legal problems which should be addressed.

Jonathan DuHamel
3150 W. Camino del Saguaro
Tucson, AZ 85745
jduhamel3@cox.net

"John Crandell "
<westcran@wildblue .ne
t>

04/04/2008 02:46 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont Mine coordinates?

To whome it may concern

My neighbors in the Stant Rita Foothils S-E of Corona de Tucson and I would like to know the coordinates of the proposed Rosemont Mine Project. The details we have seen only give a vauge location within several square miles.

Thank You
John Crandell
westcran@wildblue.net
762-8288

Randy Mathews
<randy@u.arizona.edu>
04/04/2008 01:18 PM

To: comments-southwestern-coronado@fs.fed.us
cc: lainie@scenicsantaritas.org
Subject: my opposition to the Rosemont Mine proposal

As a new resident in the area just north west of the proposed mine site, I strongly oppose any mining development of the Santa Rita mountains. I believe that negative impacts of the proposed mine far outweigh any benefit to local communities.

The potential environmental impacts of the mine are staggering. The proximity of residential areas to the mine site is especially troubling. Water table depletion, not to mention pollution, is a great concern. Air quality will degrade, and noise pollution will trouble nearby communities. I am an amateur astronomer and I worry about the effects on sky conditions in the area as a result of mining operations as well. The city of Tucson and Pima County are nationally recognized leaders in their Dark Sky initiatives. The development of a 24/7 open pit mine, with its accompanying flood lights and dust, will degrade sky conditions in an area known for its wonderful night sky viewing.

A as a local property owner I feel that my quality of life will be negatively impacted by mining development in the Santa Ritas. I moved to the area because of its natural beauty. The development of a strip mine nearby is the last thing that I want to see happen.

There are surely other mining locations that do not closely border populated areas and are not located in sensitive habitat. The Santa Ritas already serve the public as natural open space, and the region benefits from the influx of taxpayer money as a result. The public is better served in this way than by allowing strip mining to diminish the value and quality of our environment.

Thank you.

--
-Randy Mathews
Vail Resident

"Thomas Johnson "
<tnjohnson 1@cox.net>
04/04/2008 11:06 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc: <lainie@scenicsantaritas.org>
Subject: Rosemont Comments

One of the designated uses of the National Forests is recreation. The purpose of this comment sheet is to identify the impact to one aspect of the recreational use of the area of the Santa Rita Mountains that would be affected by the proposed Rosemont Copper Project and that needs to be addressed in the Environmental Impact Statement. The recreational use that I am referring to is hiking.

The Green Valley Hiking Club currently has over 400 members who make extensive use of all of the varied areas of the Coronado National Forest.
The use of these areas varies throughout the course of the year with the higher elevations of the forest being used more extensively during the warm weather months and the lower elevations during the cold weather months. The area of the Coronado National Forest that will be affected by the Rosemont Copper Project is one that the hiking club relies heavily on during the winter months when the club's enrolment swells with winter visitors. The club currently has 16 different hike routes that would be affected by the Rosemont Project. Removal of these hikes from the club's roster of potential hikes would force the club to drive much farther to reach acceptable cool weather hiking locations with a resultant increase in gasoline consumption

Thomas Johnson (Hike Leader, Green Valley Hiking Club)
901 W. Paseo Del Cilantro
Green Valley, AZ 85614-4714

Thomas N Johnson
tnjohnson1@cox.net

"Roberto Klosek "
<rklosek@theriver .com
>

04/04/2008 10:40 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc: '"Klosek, Sue \(NG\)"' <sklosek@prestolitewire.com>
Subject: proposed Rosemont Copper project

On the Proposed Rosemont Copper Project

My wife Sue and I are totally against any proposal in favor of mining and destruction of our beautiful scenery.

Roberto Klosek
Javid LLC
520-980-5011
www.manufacturing-in-mexico.com

WizzLizzy@aol .com
04/04/2008 08:34 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine Project

Attention: Team Leader Rosemont Copper Project,

Rosemont says that EVERY YEAR FOR 20 years the production will be as follows:

234 million pounds of Copper

4.5 million pounds of Molydenum

2.7 ounces of Silver

As you can see, they are going to make BILLIONS OF DOLLARS.
How MUCH WILL SOUTHERN ARIZONA Make from this mining.?
How much of that money they make will even stay in America?
If the mining lasts 20 years. They leave their tailings on our BEAUTIFUL FOREST LAND. Tourists will not want to come to Arizona any more because it is UGLY AND DESTROYED.
NOW WHAT ARE YOU GOING TO DO FOR INCOME FOR ARIZONA??

TOURISM LASTS A LIFETIME IN ARIZONA. THAT WHAT WE DEPEND ON. Mining jobs are for approximately for 20 years depending on the amount of WATER that there is. What are your plans for jobs that all the rest of Arizona has lost due to the negative impacts from the Mining?

When the mining stops, what guarentee do you have, that they will clean it up? If they leave and do not clean up, WHO WILL PAY FOR THIS CLEANUP?
Is there going to be money in a Trust for this cleanup?
Is the money going to stay in an American Bank, or will it be in a Foreign Bank where we cannot get to the money?

Team Leader, we need to see A FULL ECONOMIC IMPACT CAUSED BY MINING. WE KNOW THAT THE FOREIGN COMPANY AUGUSTA WILL MAKE TRILLIONS OF DOLLARS, and a few of our citizens will have a job for short term. BUT WHAT ABOUT THE DESTROYED TOURISM JOBS that would last a lifetime?

What about the PROPERTY OWNERS WHOSE PROPERTY VALUES ARE RUINED FROM THIS MINING? How do you intend to compensate them?

Elizabeth Nichols

Planning your summer road trip? Check out AOL Travel Guides.

swdogman4@aol.com
04/04/2008 05:19 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine project

This is absolutely the most destructive type of project I've ever seen in my life. How do we think this can possible be accomplished without major damage to the environment, to our way of life and with the estimates of increased traffic (large trucks), the roads will become extremely dangerous for years to come.

I would suggest we all stand up against this type of destruction of our forests, life style and destruction/elimination of natural resources (water for instance) in the name of progress and profits!

Steven Dow
Elgin, Az

Planning your summer road trip? Check out AOL Travel Guides.

tomarionsouth@juno .co
m

04/03/2008 07:34 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Copper Project

I am writing to explain my concerns about having an open pit copper mine in the Santa Rita Mountains.

A present there is an active mine on the Western slopes of the Santa Ritas and the dust generated by the trucks hauling material in and out of the mine area is visible for miles...the entire area around the mine and the road leading out as well as the Santa Rita road area is covered with a sheet of dust. Talk about unhealthy, that is an understatement and no one is doing anything to reduce the dust, nor are there any plans to minimize or eliminate this problem.
The habitat for the Santa Rita Experimental Range is in an extreme drought situation and the dust only compounds things, making it much worst for the creatures trying to exist out there. The quail population is down more than 70 percent from 10 years ago.
Allowing another mining operation on the Eastern slopes would only compound the dust situation and all roads in and out MUST be paved and well maintained to reduce habitat problems.

The water situation is another whole set of problems. Drill for water and sucking the Santa Ritas water table down to levels never again to return to the already low levels would be a disgrace, and a misuse of our environment.

I think the idea of a foreign company coming into the Santa Ritas and mining copper is a dangerous situation and
extreme measures must be taken to protect the environment out there so after the copper is gone, we can still enjoy the wonderful place that it once was.

Sincerely

Thomas F Dambach P.E.
Tucson Arizona

"Richard Calabro "
<r.a.calabro@att.net>
04/03/2008 05:39 PM
Please respond to
"Richard Calabro"

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Proposed Rosemont Copper Project EIS.

I am submitting the attached comments on the proposed Rosemont Copper Project EIS.

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 Apr 3 '08 EIS Comments.doc

Date: Thursday, April 3, 2008
From: 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
To: Rosemont Team Leader
Subject: Proposed Rosemont Copper Project EIS

I object to the fact that Augusta Resource Corporation has not yet completed the studies and documentation requested when the Forest Service rejected their second Mining Plan of Operation. For example, the hydrologic studies are not yet complete, therefore the hydrologic impacts cannot yet be determined.

I demand that the Forest Service STOP all activity at Rosemont by Augusta until the NEPA process is complete. Demand that the Forest Service not let Augusta piece-meal this mine, thereby avoiding REAL and meaningful environmental analysis of the impacts.

I request that the CUMULATIVE IMPACTS of all the new mining proposals in the area be considered in the EIS. Currently, in addition to the Rosemont Mine, there are several calcium carbonate/limestone mine proposals in the Davidson Canyon area, and several copper/silver mine proposals in the Patagonia Mountains, Canelo Hills and San Rafael Valley. All of these mines would use Highway 83 to transport their chemicals and explosives.

I demand that there be NO revision to the Forest Plan to accommodate Augusta! The Forest Service should NOT revise the Forest Plan to accommodate mining. The 1872 Mining Law does not require the Forest Service to revise this plan to accommodate mining. If Augusta's Mining Plan of Operation (MPO) cannot meet the current standards and requirements of the Forest Plan, then the Forest Service must deny the mine.

I ask that the process be fair! Make the mining plan and additional materials submitted by Augusta easily available to the public for review. Not everyone has internet, so make sure that hard copies are distributed throughout Southern Arizona.

I demand that Pima County, the Arizona Department of Environmental Quality, Arizona Game and Fish, and the Arizona State Office of Historic Preservation be included as "cooperating agencies," at a minimum in the EIS process.

I demand that the Forest Service conduct a validity exam on all mining claims Augusta wants to use for their mine waste, tailings, and other facilities. Unless these claims are valid, Augusta has no real legal right to use our public land for their dump.

Media must be at all public meetings to record all sides of issues raised and the FS itself must provide a general presentation to the public and media at these hearings. Federal political leaders recognize the importance of town hall-type meetings, and the FS must again remember and implement the intent of democratic public meetings: the opportunity for open and fair debate.

Extend the comment period to 60 days AFTER Augusta submits ALL information and data the Forest Service requested in their letter dated Oct. 19, 2007, rejecting Augusta's mining plan last July 2007.

Sandi Bartell
<bartell@email .arizona. edu>

04/03/2008 08:58 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Cooper Project

I am concerned with the development of the Rosemont cooper project. I believe there has not been enough research done on the issue of water contamination, and wildlife protection. Also the overall environmental impact on the area need to be addressed. Past practices of the mining industry has caused a great deal of pollution and toxicity to the environment. This project should not go forward without strident environmental restrictions placed on the copper project company and above all ENFORCED.

Sincerely,

Sandi Bartell
14180 E. Whispering Ocotillo Place
Vail, AZ 85641
thebartells1@cox.net

"Smith, Eric J Civ USAF
AFMC 578
SDS/MXDPAC"
<Eric.Smith@dm.af.mil>

04/03/2008 07:48 AM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Rosemont Mine

Dear Sirs,
I am and have been a resident of Arizona for 30 years. I strongly oppose the Rosemont mine project
.
The destruction of forest land, wild life habitat and recreational areas, will be devastating.

. I have used the Santa Rita's and would like to continue to use, this will not be possible under the proposed plan. The road to our hang gliding launch site will be closed.

The beauty of the mountain area will be destroyed by a mining operation.

The consumption of precious ground water for this mine is unacceptable.
.
The road way, highway 83, a narrow two lane will not safely support this activity and the local traffic.

Thank you

Eric J. Smith
5306 E 18th st
Tucson, Az, 85711
520-790-3507

Roland R Zachary
<rrzachary@raytheon .c
om>

04/03/2008 07:21 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: mine vs water

As I understand it they are putting a pipe line to Green Valley. It is proposed to supply half of the amount of water they intend to pull from the mountain. Well what good is that water in the valley going to do for the 100 homes they are going to pull the water from at 4000 feet. Make them haul their water just like we will have to do after they drain it all out and leave our wells dry, impacting the value our homes.
I watched a show on prostitution last week on TV, this mine is much the same. Like pimps they throw a few $ around rape the land in hiding (behind the dirt brims) abuse the water supply, molest the roads and leave when the value is gone taking their profits. This leaves a wounded soul (big hole in the ground) that no mater how many furs or cars are given (reclamation) the damage is never restored. Remains is a broken economy (100s out of work) damaged roads for the tax payers to rebuild and home values that are devalued without a water supply (my neighborhood range from 300K to 1m+. Put a stop to this now.

Roland Zachary

"Bob Witzeman "
<witzeman@cox .net>
04/02/2008 11:41 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: PUblic hearings

Dear USFS

The USFS should allow the public to speak at public hearings. We don't want to just hear the USFS officials speak. We think they have their opinions but they should keep them for their EIS documents. The NEPA process should allow the public to speak, the public to provide input and the public to ask for oversight and scrutiny of the projects planned on our public lands.

I have noticed this new tendency of having USFS officials only briefly answer questions from the audience but not allowing the audience, the American Public, to express their views. This is a move in a new direction, certainly not what I have seen in Arizona in past decades. Is it the Bush Administration closing the door to public input? Or is it the USFS just not wanting to bother to hear from the public? I don't know but either way it seems so un-American- more like a Soviet style solution—definitely not the open process NEPA WOULD IMPLY.

Bob Witzeman, Conservation Chair
Maricopa Audubon Society
4619 E. Arcadia Lane
Phoenix, AZ 85018
602 840-0052, fax 602 840-3001

<cocohenry@hughes .net>

04/02/2008 06:54 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Copper Mining in The Santa Ritas

I am not a resident of the area hoever my wife and I winter in the area. We use the area for recreation extensively. It would be a real shame to let a Canadian Co. destroy such a beautiful spot. I wonder if they would be allowed to have the same impact on their landscape. I am sending this e-mail to register my opposition to the planned mine. Thanks for the opportunity to comment.

Henry W. HAuffe
PO Box 4053
Covington, LA 70434

"CarolLoCastro"
<carollocastro@co -isp.c
om>

04/02/2008 03:56 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: proposed Rosemont Copper Project

To the Coronado National Forest:

I am opposed to the construction of an open pit copper mine in the Santa Rita Mountain mainly because of the impact it would have on the aquifer. As a resident of Green Valley, I am very concerned about the future of the water supply in this area. The mine would use a tremendous amount of water and possibly cause a crisis situation for surrounding residents. Carol LoCastro

"Ken Williamson "
<kenw@sigtechgrp .com
>

04/02/2008 01:45 PM

To: <comments-southwestern-coronado@fs.fed.us>
cc:
Subject: Hidden Hills - Rosemont Copper Project EIS

To Whom it May Concern:

Please refer to the attached document.

Hidden Hills - Rosemont.doc

April 2, 2008

Subject: Rosemont Copper Project EIS

To All Concerned:

The proposed Rosemont Copper Project should be stopped for many reasons that include but are not limited to:

- Noise pollution, air pollution and water contamination impact.
- Huge traffic increases estimated to 600-700 trucks per week on a country highway that is now classified as a "scenic highway".
- Destruction of portions of the Santa Rita Mountains and surrounding desert and grasslands that are globally recognized for biodiversity.
- Augusta wants to fill in Barrel, Wasp, McCleary and Scholefield Canyons, yet claims to have no impact to the Cienega Creek Watershed.
- Negative impact on a growing local tourism based economy.
- EPA reports that mining in Arizona has released over 39 million pounds of toxins already.
- This "foreign owned" Company, Augusta, has no record in mining in an industry that has an abysmal environmental record.
- Recreational uses of this beautiful area will be permanently and negatively impacted.

As an Arizona citizen, taxpayer and concerned Pima County landowner I am appalled that we are again faced with the huge devastation that comes from strip mining of the type being proposed. It does not take long driving around this beautiful state to observe the scars and incredible destruction that has been created by the mining industry. One short trip to communities like Globe and the surrounding area is all it takes to realize that the temporary economic gains that come from mining are hardly worth all of the negative outcomes described above.

Sincerely,

Kenneth E. and Georgia D. Williamson
5030 E. Desert Vista Trail
Cave Creek, Arizona 85331

WizzLizzy@aol .com
04/01/2008 01:06 PM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Attention: Team Leader Rosemont Mine Project

Dear Team Leader for The Rosemont Copper Mine Project,

Knowing that Water runs South to North in Southern Arizona.
I am concerned that TAKING GOOD WATER FROM SAHUARITA HEIGHTS, WILL NOT ONLY IMPACT SAHUARITA AND GREEN VALLEY,.
BUT WILL TUCSON WATER BE AFFECTED IN ANY WAY DUE TO MINING IN THE SANTA RITA MOUNTAINS? PLEASE EVALUATE THIS CONCERN in YOUR ENVIRONMENTAL IMPACT STATEMENT!?...

I have lived in Arizona for 52 years. I remember as a kid when the Water ran above ground in the Santa Cruz River in Tucson in the 1950's with many beautiful cottonwood trees along it's banks. Now to see those same beautiful cottonwood trees, you have to go to Tubac. And the river is now GONE DRY above.
All my life growning up in Tucson, we have heard everyone talking about the need to conserve water IN THE DESERT, AND CONSTANTLY BEING REMINDED THAT WE LIVE IN THE DESERT. Now Tucson, Green Valley, Sahuarita, have grown TREMENDOUSLY. Just to keep up with all the growth causing increased demands on our water supply is substancial!!!!

My question is this? With a mine using 8,000 acre-feet of water per year, which translates to BILLIONS OF GALLONS OF WATER PER YEAR FOR 20 YEARS, HOW CAN THEIR BE ENOUGH WATER FOR THE GROWING COMMUNITY? Plus what about the fact that ASARCO MINES ARE CLOSE by and they intend to open up their mine from 10 percent to full capacity. Where do they get their water? And what IMPACT will they have on the COMMUNITIES?

What happens if there is a MISCALCULATION ON THE AMOUNT OF WATER, AND THEIR IS NOT ENOUGH to last for even 10 years? Where will the water come from?????? And who will pay for the MISCALCULATION?
WILL IT BE THE FOREST SERVICE. SINCE YOUR THE AGENCY WHO IS IN CHARGE?

Thank you for hearing my concerns,
I am anxiously a waiting your response to the the raised questions in my letter.

Elizabeth Nichols

Create a Home Theater Like the Pros. Watch the video on AOL Home.

Jennifer Katcher
<jenniferkatcher@yahoo.com>

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: rosemont EIS

04/01/2008 09:02 AM

Hello,

I attended the March 18 public comment meeting in Tucson and I wish to add these comments to the record regarding the proposed Rosemont copper project.

This proposed project represents a threat to the local and regional water supply and should not proceed. I spoke with hydrologist Salek Satiquillah during the meeting, and he told me there is little understanding of the watershed in that area. Pumping the amount of water required by the mine will likely affect wells of local residents. The mine could also leach pollutants into the water table.

A huge concern I have regards the viability of Augusta. This company has never successfully opened a mine. Right now all we have is their word that they will be environmentally sensitive. I think they have already violated the public trust by bussing in people from communities near the mine to the March 18 meeting. Augsta provided a free meal, transportation and "I support mining families" buttons to these individuals. Many of these people did not speak English and clearly did not understand the purpose of the meeting or their role in being present. A Spanish speaking member of the public spoke to some of these individuals and they believed that their presence at this meeting would lead to a job with the mine. To me, this practice was deceptive at best and an outright lie at worst. This is not a company to be trusted to protect the interests of the public!

I had an opportunity to speak with Reta Laford at the meeting as well. From her comments I am optimistic that the process will be fair and as transparent to the public as possible. I was also assured that these email comments will carry as much weight as a hand-written letter. (Otherwise, I would have gladly provided these comments via mail and in handwriting).

Thank you,
Jennifer Katcher
Tucson, AZ

You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access, No Cost.
http://tc.deals.yahoo.com/tc/blockbuster/text5.com

WizzLizzy@aol .com
04/01/2008 12:09 AM

To: comments-southwestern-coronado@fs.fed.us
cc:
Subject: Rosemont Mine Project

Attention Team Leader Rosemont Copper Project,

The Forest Service should STOP ALL ACTIVITY at Rosemont by Augusta until the NEPA PROCESS AND EIS PROCESS are COMPLETE.
The Forest Service should not let Augusta piece-meal this mine, thereby avoiding REAL ENVIRONMENTAL ANALYSIS OF THE IMPACTS.

Elizabeth

Create a Home Theater Like the Pros. Watch the video on AOL Home.

Steve_in_Arizona
<nitroxer2003@yahoo.com>

04/01/2008 01:19 PM

To: Comments-southwestern-coronado@fs.fed.us
cc:
Subject: Comment: Rosemont Mine (Significant Public Health Risk Exists. Part I)

For NEPA EIS Consideration, I present the following comment for the record. Please enter my comment, the supporting (preface), and attachements into the public NEPA record.

I am concerned with the health and safety of the people and wildlife of the Santa Cruz Valley and Santa Rita mountains. At first let me reference a quote from the Saturday, February 24, 2007, meeting in Tucson, Arizona of the Committee on Natural Resources of the U.S. House of Representatives of the 110th Congress, First Session.

Statement of Chuck Huckelberry, Pima County Administrator (this contains data regards irreparable harm already caused by open pit copper mining in our area; harm to people, wildlife, and the land. Please read the following then my comments below the quote.
"H. Public Health Risks

Active copper mines release other toxic substances in the course of crushing and concentrating the ore-bearing rock. The Environmental Protection Agency's (EPA) Toxic Release Inventory indicates that Phelps-Dodge's Sierrita Mine near Green Valley released 1,053 pounds of mercury and 1,243,048 pounds of lead in 2004. The Mission Mine, operated by ASARCO, a subsidiary of Grupo Mexico, emitted 1,211,184 pounds of lead in 2004. It is located near Sahuarita. Over 100 miles of streams in Arizona are considered impaired by excessive copper, which can be toxic to aquatic organisms. Arizona's mines are the largest known sources of impairments for rivers and streams ¹².

\12\ National Assessment Database, Environmental Protection Agency.

Processing methods for copper can enhance the concentration of naturally occurring radioactive materials coming from mines. EPA has compiled data regarding the concentration of radioactive substances in the Arizona copper belt. The results show that certain common mining practices can concentrate soluble pollutants such as uranium and thorium in groundwater ¹³. Elevated levels of uranium have been detected in groundwater at Phelps-Dodge's mines near Green Valley. EPA and ADEQ are looking into the issue and have requested that Phelps-Dodge respond.

\13\ U. S. Environmental Protection Agency, 1999. Technologically Enhanced Naturally Occurring Radioactive Materials in the Southwestern Copper Belt of Arizona. Office of Radiation and Indoor Air, EPA 402-R-99-002.

High levels of sulfate and other non-toxic salts have entered groundwater in Green Valley from the Sierrita Mine. There is no enforceable health standard for sulfate, but it can cause problems with taste and digestion. As a result of concern expressed by Green Valley residents, Phelps-Dodge is providing a temporary replacement for two wells in the sulfate contaminant plume owned by Community Water in June 2005 until a permanent solution is developed and implemented.

Many of the mining facilities also have the potential to generate large amounts of dust. Such dust, or PM10, is one of the most serious air quality health concerns in Pima County and can cause a variety of health problems, including breathing difficulties, respiratory pain, reduced lung function, weakened immune system, increased severity of acute bronchitis and asthma, heart attacks, and premature death (1 to 8 years).

Pima County has been interested in acquiring BLM's surplus 540-acre Saginaw Hill property for park purposes since the 1980s because of its excellent location in a growing region of the County, but has been unable to do so because the property includes the toxic remnants of mining activities that began in the late 19th Century and continued into the 1950s. A limited environmental assessment conducted for Pima County in 1988 found problematic levels of a number of metals on the Saginaw Hill property, including aluminum, cadmium, copper, lead, and zinc. Acidic vapors were also noted on the site, and a variety of physical hazards were also present, including adits, shafts, test pits, tailings piles, and slag dumps.

A 2005 study conducted by BLM at Saginaw Hill detected several chemicals of concern on the property, including arsenic, lead, antimony, copper, mercury and thallium. The study found that ``Concentrations of these metals in waste material significantly exceed all risk-based guidelines and therefore pose a potential threat to human health and the environment." In addition, groundwater is contaminated in the direct vicinity of one of the property's mining sites, raising concerns about impacts to the surrounding area's drinking water. BLM is actively pursuing the remediation of the site, but even the most bare-bones solution is expected to cost more than $2 million, and its ultimate efficacy remains in question."

Comment:

Evidence exists for significant pollution with public harm to include disability and death from open pit copper mining. The nature of the business life of the mines is short; and, the mines are not held responsible for the damage they do. Rather they are shielded by bankruptcy laws while the toxic air and ground water releases they cause continue to plague the community. These releases include lead, mercury, and radioactive elements (tenorm).

Since Rosemont cannot guarantee their operations will do no harm or that their releases will be any different from ASARCO (a bankrupt company and originator of 18 Superfund sites from similar industry practice), I feel that the Rosemont Mine is a danger to the public health.

It is my intention to provide additional details to support my claim of public health risk from the proposed Rosemont Mine using both published and new data from the ASARCO mining operation here in Sahuarita/Green Valley.

Dr. Stephen Chrisman (Retired Family Physician)
Sahuarita, Arizona

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asarcofactsheet.pdf Arizona Toxics Released 2002.pdf border-az-factsheet-2005.pdf

AD%20reso%20withdraw%20areas%20from%20mining.pdf

last document printed with earlier letter. on 3/26/08 @ 9:11am

Asarco Mission Complex
FACT SHEET
FINAL March 5, 2003
EPA PERMIT NO. AZ0024597

This document gives pertinent information concerning the issuance of the NPDES permit listed below. The effluent limitations contained in this permit will maintain the Water Quality Standards listed in Arizona Administrative Code (AAC.) R18-11-101 et. seq. This permit, for a Major facility as specified in 40 CFR 122.2, is proposed to be issued for a period of 5 years.

Permittee's Name:	ASARCO Inc. - Mission Complex
Mailing Address:	P.O. Box 111 Sahuarita, AZ 85629
Plant Location:	4201 West Pima Mine Road Sahuarita, AZ 85629
Contact Person:	John D. Low General Manager
NPDES Permit No.	AZ0024597
ADEQ Inventory No.	100508

I. STATUS OF PERMIT(s)

The ASARCO Mission Complex filed its Notice of Intent (NOI) for coverage under the Multi-Sector Stormwater General Permit (AZRO5A72F) dated January 25, 2001. Discharges of stormwater from the facility are currently covered under a multi-sector general stormwater permit ID Number AZRO5A72F. Previous NOIs were dated January 26, 1999 (ID number AZRO5A51F) and February 3, 1993 (ID number AZR00A14F).

As the result of an inspection report (dated May 3, 2002 prepared by John Hillenbrand, U.S. EPA), Asarco was issued a Finding of Violation and Order for Compliance on June 20, 2002. Due to potential for exceeding water quality standards and due to non-compliance with components of the MSGP, EPA determined that Asarco Mission Complex was no longer eligible for coverage under the MSGP. As part of the order, EPA required that the Asarco Mission Complex apply for an individual NDPES permit by August 5, 2002.

The Mission Complex submitted a NPDES permit application to EPA on August 2, 2002.

The U.S. Environmental Protection Agency (EPA) and the Arizona Department of Environmental Quality (ADEQ) have prepared draft National Pollutant Discharge Elimination System (NPDES) permits for the discharge of mine drainage and stormwater from the Asarco Mission Complex located in Pima County, Arizona. The State of Arizona obtained primacy for the NPDES

program on December 5, 2002. The ASARCO Mission Complex is located on both private and tribal lands, and therefore the Mission Complex is subject to the jurisdiction of both the U.S. Environmental Protection Agency (EPA) and the Arizona Department of Environmental Quality (ADEQ). Therefore, EPA is issuing a NPDES permit for the discharges located on Tribal Lands, and ADEQ is issuing a AZPDES permit for discharges not located on Tribal Lands. Permit conditions in the two permits are largely identical, with the exception of the discharge points authorized by each permit; the inclusion in the AZPDES permit of several conditions related to activities occurring solely on non-Tribal land; the requirements to comply with the federal Endangered Species Act contained in the EPA NPDES permit, and the requirements contained in the ADEQ permit regarding EPA review of the permit.

II. GENERAL FACILITY INFORMATION

The Mission Complex is a commercial open pit copper mine and underground copper mine. The facility is located near Sahuarita, Arizona (18 miles south of Tucson). The mine site is spread out over an area of approximately 23 square miles and includes an open pit (measuring approximately 2.5 miles long by 1.5 miles across), associated crushing, grinding and flotation facilities, tailings facilities, waste rock dumps, and warehouse, maintenance and administrative areas. The underground mine is accessed through declines from within the pit. The area of the Mission Complex north of Pima Mine Road is located on Tribal land of the San Xavier district of the Tohono O'Odham Nation while the area south of the Pima Mine Road is primarily owned by ASARCO.

Copper mining has been conducted on the site beginning with prospectors in the 1900s. Mining continued with vertical and decline shafts in the 1920s, 1930s and 1940s. During WWII, the mine area also produced tungsten due to the high demand and price for tungsten. Open pit stripping began in 1959.

The facility has a production capacity of 400,000 tons per year of copper concentrate. The mill has processed up to 60,000 tons of ore per day although the facility is currently mining 9,200 tons of ore per day. Future production rates are likely to depend on copper prices. Ore is crushed via the primary gyrotory crusher, rod mill and ball mill. The ground ore is pumped as a slurry to froth flotation cells, where chalcopyrite is separated from non-copper bearing minerals. Lime, xanthates (a biodegradable additive that serves as a collecting agent), pine oil (a frothing agent), and methyl isobutyl carbonal are added to the mixture to facilitate separation of the copper mineral. In the flotation stage, the chalcopyrite attaches to the air bubbles and is skimmed off. The first stage, "roughing" removes approximately 88% of chalcopyrite. The skimmed materials from the roughing stages are re-ground and sent to secondary froth flotation cells (two stages). Tailings are collected from the roughing and secondary flotation cells and gravity-fed to the tailings ponds. None of the tailings facilities have been permanently reclaimed. For final processing, the copper concentrate (containing approximately 27% copper) is sent off-site for smelting.

From 1973 to 1978, a leaching plant was operated at the facility to acid leach copper from the oxide ore. However, the very high carbonate content of the orebody, and consequently the acid requirements for leaching made recovery from this orebody via leaching uneconomic, and leaching ceased. At the request of the Tribe, ASARCO currently selectively stockpiles oxidized

materials at the San Xavier Dump on Tribal lands. A typical copper porphyry deposit, such as that found at the Mission Complex can contain other minerals including silver, molybdenum, lead, zinc and manganese, and other elements such as traces of arsenic and tungsten.

III. RECEIVING WATER

The State of Arizona has adopted water quality standards to protect the designated uses of its surface waters. Streams have been divided into segments and designated uses assigned to these segments. The water quality standards vary by the designated use depending on the level of protection required to maintain that use.

Outfalls from the Mission Complex discharge to unnamed tributaries of the Santa Cruz River. All tributaries in the vicinity of the Mission Complex are ephemeral washes that only flow during a storm event. These tributaries eventually reach the Santa Cruz River in an ephemeral segment located between the Tubac bridge and the Roger Road WWTP. Pursuant to Arizona's water quality standards, unlisted ephemeral tributaries (such as those that would receive any discharge from the outfalls at the Mission Complex) are protected by the Aquatic and Wildlife ephemeral (A&We) and Partial Body Contact (PBC) designated uses. See A.A.C. R18-11-105.

Arizona's 1998 Water Quality Limited Waters List (ADEQ, EQR-98-8, July 1998) does not list as impaired the ephemeral washes near Mission or the portion of the Santa Cruz River into which these washes could flow. Thus, the receiving waters are considered "Tier 2" water bodies with respect to Arizona Water Quality Standards at Arizona Administrative Code (A.A.C.) R18-11-107.

The numeric effluent limitations in the EPA permit apply only to the discharges from the following NPDES discharge points:

Outfall No.	Description of discharge	Location of discharge
Outfall 001A	runoff from roadway next to San Xavier Oxide dump	Latitude: 32° 1' 30" N Longitude: 111° 4' 30" W
Outfall 002D	runoff from Tailings No. 2, 3, and North Dump	Latitude: 32° 1' 45" N Longitude: 111° 1' 0" W
Outfall 006L	runoff from San Xavier Dump	Latitude: 32° 2' 30" N Longitude: 111° 4 ' 30" W

The numeric effluent limitations in the ADEQ permit apply only to the discharges from the following AZPDES discharge points:

Outfall No.	Description of discharge	Location of discharge
Outfall 003G	runoff from Tailings No. 6 and 7	Latitude: 31° 58' 15" N Longitude: 111° 0 ' 0 " W
Outfall 004I	runoff from Tailings No. 8	Latitude: 31° 57' 30" N Longitude: 110° 59' 45" W
Outfall 005K	runoff from South Pima Dump and Mineral Hill Dump; stormwater run-on from west of facility	Latitude: 31° 57' 30" N Longitude: 111° 3' 45" W

IV. DESCRIPTION OF DISCHARGE

Potential pollutants at the Mission Complex are found in the following: process solutions, tailings reclaim water, tailings, waste rock and stormwater contaminated by contact with tailings and acid-generating waste rock. Based on data provided for the aquifer protection permit, the majority of waste rock generated at the Mission Complex is not acid-generating.

ASARCO has provided data from stormwater sampling at the Mission Complex as part of the MSGP. Between seven and eleven sampling episodes were conducted at five different stormwater sampling locations. The sample points include:

Sample point A - Roadway and rock dumps
Sample point B - Alluvium dump
Sample point D - Tails slope and roadway
Sample point F - roadway
Sample point H - tails slope, rock dike and dump, alluvium

The sampling data indicate the levels of Arsenic, Cadmium, Copper, Iron, Lead, Magnesium, Manganese, and Zinc have been detected. Additionally, samples indicated that levels of TSS, COD, total nitrogen, cadmium, copper, iron and zinc exceeded benchmark values listed in Tables G1 and G2 of the MSGP.

The following table is a summary of sampling data:

Parameter	Maximum Concentration	Number of Samples
Oil and Grease	4.0 mg/l	9
BOD_5	6.1 mg/l	9
COD	160 mg/l [exceeds MSGP]	18
TSS	11,874 mg/l [exceeds MSGP]	18
Total N	2.6 mg/l [exceeds MSGP]	9
Total P	ND	9
Antimony	ND	16
Arsenic	86 ug/l	16
Berylium	ND	16
Cadmium	22 ug/l (total) [exceeds MSGP]	20
Copper	36,000 ug/l (total) [exceeds MSGP]	20
Iron	105,000 ug/l (total) [exceeds MSGP]	16
Lead	160 ug/l (total)	20
Magnesium	3,500 ug/l	16
Manganese	3,400 ug/l (dissolved)	16
Mercury	< 0.5 ug/l	20

Nickel	< 50 ug/l	16
Selenium	< 100 ug/l	16
Silver	< 5 ug/l	16
Zinc	1820 ug/l (total) [exceeds MSGP]	20

V. STATUS OF COMPLIANCE

The ASARCO Mission Complex filed its Notice of Intent (NOI) for coverage under the Multi-Sector Stormwater General Permit dated January 25, 2001. Discharges of stormwater from the facility are currently covered under a multi-sector general stormwater permit ID Number AZRO5A72F. Previous NOIs were dated January 26, 1999 (ID number AZRO5A51F) and February 3, 1993 (ID number AZR00A14F).

As the result of an inspection report (dated May 3, 2002 prepared by John Hillenbrand, U.S. EPA), ASARCO was issued a Finding of Violation and Order for Compliance on June 20, 2002. A summary of compliance problems identified at the Mission Complex include:

- The Stormwater Pollution Prevention Plan (SWPPP) was missing essential elements and was not adequate to address requirements of the MSGP.
- A tailings spill occurred on 5/11/01, consisting of 200 tons of tailings slurry on Pima7 slopes 1 and 2.
- Monitoring data of runoff has demonstrated a reasonable potential to exceed Arizona water quality standards. Exposed mineralized materials were noted to be present at various locations including road construction materials West of the Tailings No 6 and along the outer slopes of tailings piles and rock dumps.
- A lack of BMP's at certain location even though the site was permitted since 1993.

The Order for Compliance included:

- Due to compliance problems listed above, Asarco Mission Complex is no longer eligible for coverage under the MSGP and must apply for an individual NDPES permit
- ASARCO must take all actions necessary to ensure that discharges do not cause or contribute to violations of water quality standards.
- ASARCO must develop an adequate SWPPP that is based on the MSGP but includes more BMP's and monitoring for approval by EPA and ADEQ.
- ASARCO must perform a biological assessment of the Mission Complex to evaluate critical habitat and species protected under the Endangered Species Act.
- ASARCO must perform additional discharge monitoring.

- ASARCO must make permanently accessible for inspection all areas of the Mission Complex where stormwater inspections are required.

The activities to comply with the Order are ongoing at the Mission Complex.

VI. DETERMINATION OF EFFLUENT LIMITATIONS

When determining what parameters need monitoring and or limits included in the draft ASARCO Mission Complex permit, both technology-based and water quality-based criteria were compared and the more stringent criteria applied.

Technology-based Limitations:

The Mission Complex operates a copper concentrator that utilizes the froth flotation process. Process wastewater discharged from the froth flotation process and mine drainage is subject to the effluent limitations at 40 CFR Part 440 Ore Mining and Dressing Point Source Category. Subpart J, the Copper, Lead, Zinc, Gold, Silver, and Molybdenum Ores Subcategory, applies to mines that produce copper, lead, zinc, gold, silver or molybdenum ores, singly or in combination, from open-pit, or underground operations.

The Mission Complex does not discharge wastewater from its froth flotation process due to recycle and containment of the effluent. The reject from the froth flotation process is gravity-fed to large tailing impoundments where the tails settle out. The decanted water is recycled and pumped back to the concentrator for re-use. Additionally, process wastewater generated at the mill location is contained in impoundments designed to contain the 100 year 24 hour storm event. These locations include the South facility (currently inactive) and the North facility. The South facility drainage, consisting of a combination of tailings reclaim water, mine drainage and stormwater run-off from process areas not covered under the multi-sector general stormwater permit are contained in sedimentation basin RB9 and any overflow would be directed to a series of impoundments with containment designed to hold the 100 year 24 hour storm event. RB9 is unlined. There is no proposed discharge location from this area.

The North facility drainage, consisting of a combination of tailings reclaim water, process solution, mine drainage and stormwater run-off from process areas not covered under the multi-sector general stormwater permit are contained in sedimentation basins RB23 and Mission 1. The containment pond RB23 is not lined. These impoundments are designed to contain the 100 year 24 hour storm event and do not have a discharge point.

Any discharge of mine drainage subject to Part 440 Subpart J may qualify for the *Storm exemption for facilities permitted to discharge* as permitted in 40 CFR Part 440.131 (b). This storm exemption allows a source with an allowable discharge under 40 CFR Part 440 to have an overflow as a result of a storm event that does not meet the limitations established in 40 CFR Part 440 if that facility (1) is designed, constructed and maintained to contain the maximum volume of wastewater which would be generated by the 10-year, 24 hour storm event and (2) has taken all reasonable steps to maintain treatment and minimize overflow and (3) provides notification of such discharges.

The Mission Complex will control all areas of mine drainage and areas of potential mine drainage within containment designed to contain the 24 hour, 100-year storm event. Therefore, discharges from the Mission Complex qualify for the stormwater exemption. The requirements for containment, maintenance, and sampling of runoff are detailed in the Section C of the permit requiring that ASARCO establish Best Management Practices and submit a Stormwater Pollution Prevention Plan (SWPPP) for approval of the permitting authority.

Numeric Water Quality Standards: As outlined in A.A.C. R18-11-109 and Appendix A:

Per 40 CFR 122.44(d)(1)(ii), (iii) and (iv), limits have been included in the permit for parameters with 'reasonable potential', that is, those known to be or expected to be present in the effluent at a level that could potentially cause any applicable numeric water quality standard to be exceeded. The procedures used to determine reasonable potential are outlined in the *Technical Support Document for Water Quality-based Toxics Control (TSD)* (EPA/505/2-90-001).

Permit Limitations:

Guidance for the determination of reasonable potential to discharge toxic pollutants is included in both the *Technical Support Document for Water Quality Based Toxics Control (TSD)* - Office of Water Enforcement and Permits, U.S. EPA, dated March 1991 and the *U.S.EPA NPDES Permit Writers Manual* - Office of Water, U.S. EPA, dated December 1996.

EPA's technical support document contains guidance for determining the need for permit limits. In doing so, the regulatory authority must satisfy all the requirements of 40 CFR 122.44(d)(1)(ii). In determining whether the discharge causes, has the reasonable potential to cause or contributes to an excursion of a numeric or narrative water quality criterion for individual toxicants, the regulatory authority must consider a variety of factors. These factors include the following:

- Dilution in the receiving water,
- Type of industry,
- Existing data on toxic pollutants,
- History of compliance problems and toxic impacts,
- Type of receiving water and designated use.

A. Dilution in the receiving water

All discharges from outfalls in the Mission Complex are to ephemeral washes that are tributaries to the Santa Cruz River, itself an ephemeral waterbody in this area. Discharges from the mine site through the NPDES permitted outfalls will only occur during major storm events or during very wet seasons. Discharges during these conditions would be subject to an unknown amount of dilution in the receiving water. Reasonable potential to exceed surface water quality standards in the receiving water would exist if discharges occurred from the facility during dry weather when dilution is not available, but such dry weather discharges should not occur. However, determining reasonable potential to exceed standards during wet weather cannot be accomplished unless the in-stream flow rate is known and the dilution factor can be determined.

B. Type of Industry

The Mission Complex is a copper mine employing the froth flotation process to extract copper. Effluent limitations under Part 440 Subpart J have been developed for copper mines to regulate the following metals: copper, zinc, cadmium, lead and mercury. Copper mines are assigned the highest total toxicity number for discharges under the 1987 Standard Industrial Classification (SIC) code. Reasonable potential exists for discharges from an open-pit copper mine and associated stormwater runoff to exceed surface water quality standards by nature of the type of industry.

C. Determination of Reasonable Potential

Effluent monitoring data for the Mission Complex found hardness levels up to 1140 mg/l. Arizona water quality standards allow a maximum hardness of 400 mg/l to be used in developing water quality standards.

Water quality standards for ephemeral washes are meant to be protective of acute effects, since stormwater is only present for short periods of time. If effluent meets the daily maximum standard, it will be protective of the acute toxics affect on organisms. Therefore, only Daily Maximum Discharge Limits (MDLs) were determined for this permit and were set at the lowest applicable Arizona standard. (Note: The statistical TSD procedures for setting Maximum Daily Discharge Limits and Average Monthly Limits were not used for this permit. The TSD method would only apply when both monthly and daily limits are set.)

The reported maximum effluent value or the statistically estimated maximum effluent value is compared to the lowest applicable water quality criterion to determine the potential for an exceedence of that criterion and the need for an effluent limit. If one of the effluent values is greater than the water quality criterion, then an effluent limit is included in the draft permit.

The following table is a summary of sampling data provided in the permit application.

Parameter	Maximum Concentration	Statistical maximum concentration	Most Stringent water quality standards (total)	Reasonable Potential
Arsenic	86 ug/l	215	420 ug/l PBC	No
Cadmium	22 ug/l	50.6 ug/l	289.5 ug/l A&We	No
Copper	36,000 ug/l	> 36,000	85.9 ug/l A&We	Yes
Iron	105,000 ug/l	---	None	No
Lead	160 ug/l	368	15 ug/l PBC	Yes
Magnesium	3,500 ug/l	---	None	No
Manganese	3,400 ug/l	8,500	196,000 ug/l PBC	No
Mercury	< 0.5	0.575	5.0 ug/l A&We	No
Silver	< 5	6.25	37.4 ug/l A&We	No
Zinc	1820 ug/l	4186	3,599 ug/l A&We	Yes

Based on the above factors, EPA has determined that discharges from NPDES outfalls 001A, 002D, and 006L have the reasonable potential to exceed surface water quality standards for the following metals: copper, lead, and zinc.

Additionally, new Arizona water quality standards list water quality standards for E. coli for PBC. However, due to the nature of mining, the Mission Complex is not expected to contribute E. coli to its discharge that would cause or have the reasonable potential to cause a water quality exceedence of E. coli. Therefore, no limit has been set for E. coli.

D. Establishing Daily Maximum Permit Effluent Limitations Based on Hardness

The permit includes daily maximum permit effluent limitations for metals based on the aquatic and wildlife (ephemeral) acute toxicity criteria for copper and zinc.

The March 31, 2002, revisions to the Arizona Surface Water Quality Standards incorporated footnotes *k.1 and k.2* to Appendix A, Table 2 establishing a hardness 'cap' of 400 mg/l as calcium carbonate. The 400 mg/l 'cap' is applicable to all designated cold-water and warm-water fisheries, effluent dominated water bodies and ephemeral water bodies in Arizona. Footnotes *k.1 and k.2* require that hardness be based on the hardness of the effluent from a sample taken at the same time as the metal sample.

Hardness values have been measured up to 1140 mg/l. Use of the hardness 'cap' of 400 mg/l for the calculation of effluent limitations is therefore appropriate. The permit includes single value effluent limitations for copper and zinc that have been calculated using the equations in the footnotes to Appendix A, Table 2 of the Arizona Surface Water Quality Standards and an upper limit hardness value of 400 mg/l.

The lead limit is based on the newly adopted PBC standard rather than the A&We standard. The PBC standard is not hardness dependent.

E. Establishing Total Recoverable Metals Effluent Limitations from Water Quality Criteria

Arizona's NPDES Permit Writer's Process Guidance Workbook (Appendix L, Water Quality-based Effluent Limitations for Metals and Translator Studies) states that when developing total recoverable effluent limitations for metals, the permit writer should assume that the relationship between total recoverable and dissolved is 1:1 (i.e., translator = 1). Therefore, limitations for copper, lead and zinc have been incorporated into the permit as total recoverable limitations.

F. Final Limitations Summary

For pollutants with demonstrated reasonable potential to exceed surface water quality standards, this permit retains effluent limitations based on the most stringent of either technology-based limitations or state water quality standards. Permit effluent limitations based on the aquatic and wildlife, ephemeral beneficial use, were calculated using the foot-noted equations to Table 2 of the Arizona surface water quality standards and a single value hardness of 400 mg/l.

TABLE 4 - Basis For Final Permit Limitations

Parameter	Basis Daily Max.
pH	6.5 to 9 - A&We (1), PBC (2)
Copper (3)	AZ WQS - A&We (1), acute
Lead (3)	PBC (2)
Zinc (3)	AZ WQS - A&We (1), acute

Footnotes:
(1) AZ WQS - A&We = Arizona Surface Water Quality Standard - Aquatic and Wildlife, ephemeral
(2) AZ WQS PBC = Arizona Surface Water Quality Standard - Partial Body Contact
(3) These standards are written for total dissolved metals so a translator of one to one dissolved to total recoverable is assumed. The final permit effluent limitations for these metals are listed as total recoverable metals.

VII. NARRATIVE WATER QUALITY STANDARDS

All applicable narrative limitations in A.A.C. R-11-108 are included in the permit.

VIII. MONITORING REQUIREMENTS

Additional monitoring at discharge outfalls

The Mission complex has been regulated by the Multi Sector General Permit for stormwater associated with mining activities. Tables G-1, G-2 and G-3 establish benchmark monitoring parameters for active and inactive stormwater runoff.

Based on data submitted in the permit application, this permit identifies several pollutants with the reasonable potential to cause or contribute to a water quality violation. This permit establishes effluent limitations for all discharge points for pH, copper, lead, and zinc.

Based on the data submitted in the permit application, the following additional parameters have exceeded the benchmark values: TSS, COD, total nitrogen, and iron, although EPA determined that there is no reasonable potential to violate water quality standards based on existing data. Therefore, this permit continues monitoring requirements for TSS, COD, total nitrogen, and iron but does not establish effluent limits for these parameters at this time.

Data has not been submitted for many of the parameters listed in Tables G-1, G-2 and G-3 of the MSGP. Based on available data, soil characteristics, and industry operations, EPA does not have knowledge that any other pollutant has the reasonable potential to cause or contribute to water quality violations. However, the permit requires further monitoring at all outfalls for those parameters listed in Tables G-1, G-2, and G-3 where EPA requires more data to determine reasonable potential. These are the same monitoring requirements that were required in the Findings of Violation and Order for Compliance and that were addressed in ASARCO's sampling plan submitted to EPA on August 2, 2002. The Order requires monitoring for these parameters through June 2006. Monitoring requirements include the following parameters:

Flow Rate
Total Suspended Solids
Chemical Oxygen Demand

Nitrogen as Nitrate plus Nitrite
Hardness
Turbidity
pH

Metals
Arsenic (Total recoverable and Dissolved)
Cadmium (Total recoverable and Dissolved)
Copper (Total recoverable and Dissolved)
Iron (Total recoverable)
Lead (Total recoverable)
Manganese (Total recoverable and Dissolved)
Mercury (Total recoverable and Dissolved)
Selenium (Total recoverable and Dissolved)
Silver (Total recoverable)
Zinc (Total recoverable and Dissolved)

IX. SPECIAL CONDITIONS

Development of Best Management Practices

The ASARCO Mission Complex filed its Notice of Intent (NOI) for coverage under the Multi-Sector Stormwater General Permit dated January 25, 2001. The MSGP requires the preparation and maintenance of a SWPPP as indicated in Part 4 and Part 6.G.6.1 of the MSGP.

As the result of an inspection report (dated May 3, 2002 prepared by John Hillenbrand, U.S. EPA), ASARCO was issued a Finding of Violation and Order for Compliance on June 20, 2002. As part of this order, EPA found that the Mission Complex SWPPP was inadequate and required that the ASARCO Mission Complex submit a revised SWPPP for approval by EPA. The Order for compliance included the following specific requirements for compliance with the SWPPP:

"a. Conduct a drainage basin assessment to determine the outline of each basin, and its BMP(s) and designated outfall, or termination (if controlled by evapotransporation or infiltration. Describe assumptions and methods used to determine the position of drainage divides. The method must include field verification. Present this data on the site map.

b. Assess all facilities according to Table G-4 of the MSGP and catagorize which facilities and discharges are eligible for coverage under the MSGP, and which facilities and discharges- include process fluids, mine drainage or other pollutants that may cause or contribute to violations of water quality standards- are ineligible for coverage under the MSGP. Process fluid facilities must be designated as such, and represented on the site map. Facilities with a potential to discharge process solution are subject to effluent limitation guidelines under 40 CFR 440. Containment or control must be demonstrated for all disturbed areas of the mine.

c. Determine stormwater capacities for all MSGP and non-MSGP retention basins and conveyance structures around the site. Diversion and conveyance structures must be able to contain expected monsoon-type flows. Calculations must be provided.

d. Describe structures that will prevent commingling of MSGP stormwater runoff and process fluids.

e. Describe appropriate BMPs that you will use to control pollutants in stormwater discharges for areas where BMPs are not currently in place or for ones that need modification. Include performance standards. Design all MSGP appropriate facilities to be as close to the source of pollutants as possible.

f. Revise the site map and show all features required in Part 6.G.6.1.2. and Part 4.2.2.3. of the MSGP. Include the mine feature (such as topographic lines representing tailings facility 4) to which the BMPs are applied. Include process water controls, and storage facilities, drainage area boundary lines and outfall or termination points.

g. Describe a method to implement repairs to facility deficiencies found during regular maintenance inspections at all stormwater facilities. Implement monthly inspections and monitoring to insure that inspection maintenance related repairs are being done in accordance with the MSGP."

To date, ASARCO has complied with the requirements of the order and the activities are ongoing at the Mission Complex. ASARCO submitted a revised SWPPP (dated August 2, 2002) to EPA for approval.

Permit SWPPP requirements

As noted in Section V, EPA determined in the Compliance Order that the Mission Complex is no longer eligible for coverage under the MSGP. Therefore, the draft permit identifies specific BMP requirements to be included in the SWPPP. Some of the requirements of the SWPPP (such as providing a description of the facility and a facility site map) will be completed within three months of the permit issuance, while other requirements of the SWPPP (such as maintenance and employee training) will require ongoing actions throughout the life of the permit.

The permit contains specific requirements for the SWPPP based on the required components of the MSGP and on ASARCO's proposed SWPPP. Specific components to be included in the SWPPP are a site description, evaluation of potential pollution sources, methods for the control of mine drainage, construction of stormwater diversions, stormwater containment controls, stormwater source controls, corrective measures, site inspection and maintenance, employee training, and requirements for a site map.

Due to the potential for runoff generated from the mine site to cause or contribute to a violation of water quality standards, the SWPPP will include provisions for stormwater management.

All stormwater at the Mission Complex will be controlled through one of the following four methods:

1. Stormwater run-off will be diverted through berms, channels, dikes or other means to containment areas where no discharge of water occurs;

2. Stormwater run-off will be diverted through berms, channels, or dikes designed to convey the 100 year, 6 hour storm event to sediment ponds designed to hold the 100 year 24 hour storm event;

3. Stormwater run-on (generated from off-site) will be diverted around mining activities to prevent contamination; or

4. Potential stormwater contaminants will be controlled at the source by capping or removing all exposed mineralized materials and establishing a stable slope through grading and establishing vegetative cover. Stormwater runoff generated from areas controlled at the source will not be bermed or diverted to sedimentation ponds.

When the permittee completes the work required by the permit and the compliance order, the Mission Complex will provide 100-year, 24-hour containment for virtually all stormwater at the facility. At that point, most of the outfalls identified in this permit would not discharge except during storm events exceeding the 100-year, 24-hour event. In some cases, EPA and ADEQ have considered facilities providing physical containment (not including pumping) sufficient to contain the 100-year, 24-hour storm event as zero discharge facilities. However, the enhanced containment at Mission has not been completed at the time of drafting this permit, so all of the existing discharge points are identified as outfalls in the permit. At the time of permit renewal, the permittee may raise with the permitting authority the necessity of permitting outfalls that are capable of containing runoff associated with the 100-year, 24-hour storm event.

Regulatory Basis for Best Management Practices Program

The regulations at 40 CFR 122.44(k)(4) state that:

"In addition to the conditions established under § 122.43(a), each NPDES permit shall include conditions meeting the following requirements when applicable.

(k) Best management practices (BMPs) to control or abate the discharge of pollutants when:

(4) The practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA."

The development of BMP plans and individual best management practices for mining operations is supported by the nature of mining operations in general. Disturbance of the overburden due to surface mining causes significant changes in the physical and chemical nature of the mined area, and BMPs are designed to avoid or control discharges which may cause or contribute to violations of water quality standards.

Compliance Schedule

The requirements for schedules of compliance are stated in the Arizona surface water quality standards at A.A.C. R18-11-121. The requirements at A.A.C. R18-11-121 allow, under certain conditions, a compliance schedule to be incorporated into an existing NPDES permit to bring a facility into compliance with a new or revised water quality based effluent limitation (WQBEL). The requirements at A.A.C. R18-11-121 also allows for a compliance schedule to be established to bring a point source discharge of stormwater into compliance with a water quality standard.

Pursuant to Compliance Order No. CWA 402-9-02-31, the Permittee is developing a Work Plan for EPA approval. The Work Plan establishes a schedule to implement the construction and maintenance activities necessary to provide the stormwater containment and control mandated by this permit and the Order. Some of these activities require additional federal or state permits or approvals prior to construction. Therefore, it is appropriate to establish a compliance schedule for the Mission Complex.

EPA has therefore incorporated a compliance schedule that allows the Mission Complex to comply with the schedule established in the approved Work Plan, but that does not delay compliance by more than three years from the issuance of the permit.

X. ENDANGERED AND THREATENED SPECIES

1. Biological Evaluation

Biological surveys were conducted in 1995 and 1997 in connection with a proposed expansion of the Mission Complex. The 1995 and 1997 surveys indicated the presence of the Pima pineapple cactus (PPC) in and around the Mission Complex.

The SWPPP submitted to EPA as part of the Order for Compliance requires Asarco to construct additional stormwater containment facilities for the control of runoff. Due to the known presence of endangered species, Asarco conducted a biological survey to evaluate the potential effects of construction on endangered species.

A new biological survey was conducted in 2002 for the Pygmy Owl and the PPC. No pygmy owl was found on private lands (although a second survey is required on tribal lands). The construction of stormwater controls will affect the PPC. Construction of the stormwater controls will disturb approximately 165 acres, and a survey for PPC was done for 150' around the perimeter. The biological assessment assumed a 100' disturbance (although actual disturbance may be down to 50' in some areas). The survey found 70 PPC, of which 17 PPC will be directly affected by constructing the stormwater controls.

A formal endangered species consultation with the U.S. Fish and Wildlife service was conducted regarding the PPC. EPA, ASARCO Inc., and the Tohono O'Odham propose the following measures to minimize potential adverse effects to the PPC and its habitat:

1. Stormwater controls will be designed in such as way as to avoid individual PPC and areas of PPC concentration insofar as practicable while complying with the SWPPP.

2. The release of channelized run-on stormwater at SWPPP-designated outfalls will be directed into existing ephemeral drainages rather than as sheetwash dispersed over the general area. No PPC or suitable PPC on the Mission complex, or adjoining areas beyond the footprint of the Mission complex, will be adversely affected by discharge of stormwater or invasion of exotic plants as a result of excess water, erosion, or deposition of excessive amounts of silt or other materials.

3. Tohono O'Odham has jurisdiction over PPC on their lands and the disposition of the 13 PPC located on Tohono O'Odham lands will be determined by Tohono O'Odham, San Xavier natural resources staff, and Asarco before removal.

4. The proposed action will result in the permanent removal of 58.5 acres of PPC habitat.
   Asarco is going to expand its existing 877-acre conservation easement by 58.5 acres to compensate for the loss of PPC habitat. The location of this area will be within the Mission Complex, but not necessarily adjacent to the existing easement. The location will be coordinated with the FWS within one year of the date of this opinion.

5. The four PPC that are on private lands within the Mission complex will be transplanted to Asarco's PPC conservation easement.

The consultation is concluded and the following are recommendations from the Biological Opinion:

1) EPA would work with Asarco and FWS to expand the size of the PPC conservation area at the Mission complex.

2) EPA would work with Asarco and FWS to transplant affected PPC to the newly expanded segments of the conservation area.

3) EPA would participate on the stakeholder participation team developing the Pima pineapple cactus recovery plan and consider contributing to on-going survey efforts in Pima and Santa Cruz counties to determine the status of PPC on State lands.

4) EPA, in cooperation with FWS, would develop long-term conservation strategies for PPC and incorporate those strategies into the NPDES program.

XI. PERMIT REOPENER

The draft permit contains a reopener clause to allow for modification of the permit if reasonable potential is demonstrated during the life of the permit.

XII. STANDARD CONDITIONS

Conditions applicable to all NPDES permits are included in accordance with 40 CFR, Part 122.

XIII. ADMINISTRATIVE INFORMATION

Public Notice (A.A.C. R18-9-A907)
The public notice is the vehicle for informing all interested parties and members of the general public of the contents of a draft NPDES permit or other significant action with respect to an NPDES permit or application. The basic intent of this requirement is to ensure that all interested parties have an opportunity to comment on significant actions of the permitting agency with respect to a permit application or permit. This permit will be public noticed in a local newspaper after a pre-notice review by the applicant and other affected agencies.

Public Comment Period (A.A.C. R18-9-A908)
Rules require that permits be public noticed in a newspaper of general circulation within the area affected by the facility or activity and provide a minimum of 30 calendar days for interested parties to respond in writing to EPA. After the closing of the public comment period, EPA is required to respond to all significant comments at the time a final permit decision is reached or at the same time a final permit is actually issued.

Public Hearing (A.A.C R18-9-A908(B))
A public hearing may be requested in writing by any interested party. The request should state the nature of the issues proposed to be raised during the hearing. A public hearing will be held if the Director determines there is a significant amount of interest expressed during the 30-day public comment period, or if significant new issues arise that were not considered during the permitting process.

XIV. Additional Information

Additional information relating to this proposed permit may be obtained from the following locations:

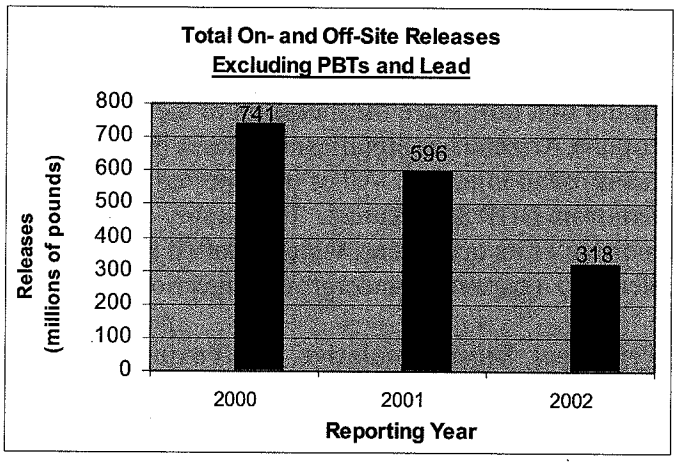
U.S. Environmental Protection Agency, Region IX
CWA Standards & Permits Office Mail Code: WTR-5
75 Hawthorne Street
San Francisco, California 94105-3901
Telephone: (415) 972-3518
Attn: John Tinger

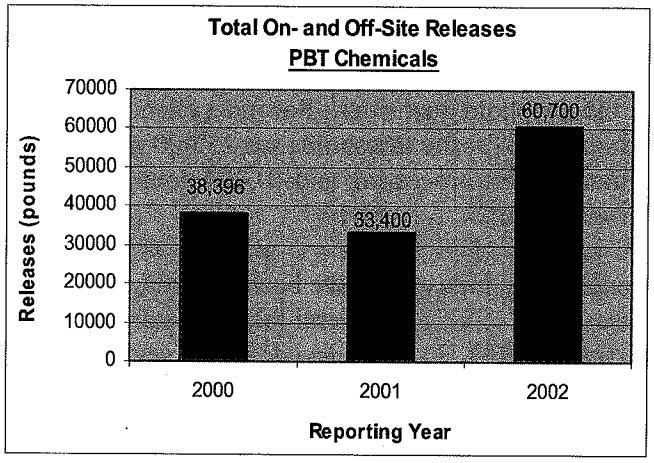
ADEQ
Water Quality Division - Surface Water Permits Unit Mail Code: 5415B-3
Attn: Ingrid Clark
1110 W. Washington Street
Phoenix, Arizona 85007
Telephone:(602)771-4678

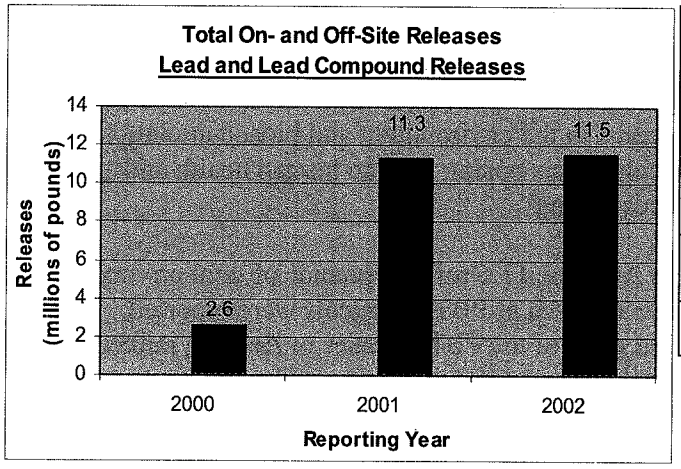
Arizona Report: 2002 Toxics Release Inventory

U.S. EPA Region 9
Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations

Toxic Chemical Releases: 2000 - 2002







Total Releases for Reporting Years 2000-2002

Year	Air	Land	Under-ground Injection	Water	Off-Site
2000	5,206,719	737,230,540	0	9,238	1,283,045
2001	4,586,195	601,487,965	0	6,377	819,101
2002	4,132,814	322,351,577	2,184,988	6,911	432,563

The 2002 Public Data Release

EPA has just made public the 2002 data on toxic chemicals that were released to Arizona's air, water and land. This information comes from the Toxics Release Inventory (TRI), a federal community right-to-know program. In Arizona, 276 facilities reported a total of 329 million pounds of toxic chemical releases*.

It is important to note that release should not be directly equated with risk. To evaluate risk, release data must be combined with information about

** Release is defined as the amount of a toxic chemical released on-site (to air, water, underground injection, landfills and other land disposal), and the amount transferred off-site for disposal. Year to year data comparisons do not reflect changes in reporting requirements.*

chemical toxicity, site-specific conditions, and exposure. In addition, this data does not indicate whether a facility is violating environmental laws. Many of the substances reported through this program are subject to state and federal regulations designed to protect human health and the environment.

Industries

A facility is subject to TRI reporting requirements if it: has 10 or more full-time employees; is classified under a reportable Standard Industrial Classification (SIC) code; and manufactures, processes, or otherwise uses any of the listed toxic chemicals in amounts greater than the threshold quantities. For most chemicals (excluding PBTs) the thresholds are 25,000 pounds for manufactured or processed, and 10,000 pounds for otherwise used.

Manufacturing industries have been reporting their releases since 1987, and federal facilities started reporting in 1994. In 1998, an additional seven industry sectors began reporting their toxic chemical releases for the first time. These sectors are metal and coal mining, electricity generation, commercial hazardous waste treatment, solvent recovery, petroleum bulk terminals, and wholesale chemical distributors.

Releases

On April 2, 2003 the District Court for the District of Columbia issued a decision in Barrick Goldstrike Mines, Inc. v. Whitman, (Civ. Action No. 99-958 (TPJ)), regarding the TRI reporting obligations of mining facilities. The court determined that non-PBT chemicals present in waste rock are eligible for the de minimis exemption. The de minimis exemption states that a facility is not required to consider the quantity of a toxic chemical present in a mixture if it is below 1% of the mixture, or 0.1% of the mixture in the case of a toxic chemical which is a carcinogen. Prior to the decision mining facilities were required to consider all concentrations of toxic chemicals in waste rock.

This decision is greatly responsible for the 46% decrease from reporting year 2001 for on- and off-site releases for the state. Primary smelting and refining of copper and copper ore metal mining facilities make up 96.7% of the total on- and off-site releases and experienced a 47% decrease in land releases.

Many mines extract, move, store, process, and dispose of large amounts of waste rock and ore -- materials which often contain low concentrations of naturally occurring metals. The vast majority of this material is placed in surface impoundments or on the land, and the metals are reported as on-site releases to land. This previously buried material is exposed to potential leaching by rain, snow, and acid mine drainage, and must be carefully managed and monitored to prevent any surface water or ground-water contamination.

For the first time since the inception of the TRI program Arizona has significant releases by underground injection. All of the reported releases were from BHP San Manuel. The facility discontinued a portion of its operations, which resulted in a one-time release to a permitted underground injection well.

Persistent, Bioaccumulative, and Toxic Chemicals

In the year 2000, TRI was expanded to include additional persistent, bioaccumulative and toxic (PBT) chemicals, and to require reporting for these chemicals at lower thresholds, ranging from 0.1 grams to 100 pounds. PBT pollutants are toxic chemicals that persist in the environment and bioaccumulate in food chains, thus posing risks to human health and ecosystems.

In Arizona, 11.6 million pounds of total on- and off-site releases of PBT chemicals were reported. Below is a table of the PBT releases in Arizona ranked by total on- and off-site releases. The data is in pounds for all chemicals except dioxin, which is given in grams.

Table of PBT Chemical Releases in Arizona

Chemical	Total On- and Off-Site Releases 2001	Total On- and Off-Site Releases 2002	Percent Change
Lead Compounds	11,198,441.6	11,420,208.43	2
Lead	82,694.95	97,524.96	18
Mercury Compounds	30,097.38	56,873.66	89
Tetrabromobisphenol A	218.21	1,883.00	763
Polycyclic Aromatic Compounds	1,638.35	1,098.30	-33
Mercury	703.01	831.14	18
Dioxin and dioxin-like compounds (in grams)	16.38	13.28	-19
Benzo (g,h,i)perylene	0.74	1.07	44
Polychlorinated Biphenyls	726.00	0.00	-100

Releases of persistent, bioaccumulative and toxic (PBT) chemicals in pounds. Dioxin and dioxin-like compounds data not in Toxicity Equivalence (TEQ).

Lead and Lead Compounds

Starting in the year 2001, lead and lead compounds were reported as persistent, bioaccumulative and toxic (PBT) chemicals. While lead and lead compounds have been on the list of reportable chemicals since 1987, for the year 2001 the reporting threshold was lowered from 25,000 pounds manufactured or processed, and 10,000 pounds otherwise used to 100 pounds for the manufacture, process, or otherwise use of lead and lead compounds. As a result, additional facilities are required to report releases of lead and lead compounds.

Over 11.5 million pounds of total on- and off-site releases of lead and lead compounds were reported in Arizona. Ninety-eight percent of these releases are land releases from copper mining facilities.

Mercury and Mercury Compounds

Much of the mercury and mercury compound releases reported were released to land (nearly 55,000 pounds) by BHP San Manuel. Air emissions of mercury and mercury compounds accounted for 2.7% (1,560 pounds) of the total releases and were released from electric generating facilities.

Top Facilities for Releases

The top 10 facilities for total on- and off-site releases, for all chemicals, in Arizona are:

1. BHP Copper N.A. San Manuel (San Manuel, Pinal County) with 248.7 million pounds.
2. ASARCO Inc. Ray Complex Hayden Smelter & Concentrator (Hayden, Gila County), with 34.9 million pounds.
3. Phelps Dodge Miami Inc. (Claypool, Gila County) with 22.8 million pounds.
4. Phelps Dodge Morenci Inc. (Morenci, Greenlee County) with 4.3 million pounds.
5. ASARCO Inc. Mission Complex (Sahuarita, Pima County) with 3.1 million pounds.
6. Tucson Electric Power Springerville Generating Station (Springerville, Apache County) with 2.8 million pounds.
7. ASARCO Inc. Ray Ops. Mine (Kearny, Pinal County) with 2.3 million pounds.
8. Navajo Generating Station (Page, Coconino County) with 1.9 million pounds.
9. Phelps Dodge Sierrita Inc. (Green Valley, Pima County) with 1.6 million pounds.
10. Cholla Power Plant (Joseph City, Navajo County) with 1.2 million pounds.

The top 10 facilities for total on- and off-site releases, for PBT chemicals, in Arizona are:

1. BHP Copper N.A. San Manuel (San Manuel, Pinal County) with 55,000 pounds.
2. Isola Laminate System (Chandler, Maricopa County) with 1,883 pounds.
3. Navajo Generating Station (Page, Coconino County) with 733 pounds.
4. ASARCO Inc. Ray Ops. Mine (Kearny, Pinal County) with 649 pounds.
5. Tucson Electric Power Springerville Generating Station (Spingerville, Apache County) with 597 pounds.
6. Coronado Generating Station (Saint Johns, Apache County) with 357 pounds.
7. Phelps Morenci Inc. (Morenci, Greenlee County) with 341 pounds.
8. ASARCO Inc. Ray Complex Hayden Smelter & Concentrator (Hayden, Gila County) with 304 pounds.
9. Cholla Power Plant (Joseph City, Navajo County) with 226 pounds.

⑩ Arizona Electric Power Cooperative Inc. (Cochise, Cochise County) with 164 pounds.

The top 10 facilities for total on- and off-site releases, for lead and lead compounds, in Arizona are:

❶ ASARCO Inc. Ray Complex Hayden Smelter & Concentrator (Hayden, Gila County) with 3.4 million pounds.
❷ ASARCO Inc. Mission Complex (Sahuarita, Pima County) with 2.6 million pounds.
❸ ASARCO Inc. Ray Ops. Mine (Kearny, Pinal County) with 2.0 million pounds.
❹ Phelps Dodge Miami Inc. (Claypool, Gila County) with 1.4 million pounds.
❺ BHP Copper N.A. San Manuel Ops. (San Manuel, Pinal County) with 1.3 million pounds.
❻ Phelps Dodge Sierrita Inc. (Green Valley, Pima County) with 445.7 thousand pounds.
❼ Phelps Dodge Bagdad Inc. (Bagdad, Yavapai County) with 95.0 thousand pounds.
❽ Tucson Electric Power Springerville Generating Station (Springerville, Apache County) with 74.7 thousand pounds.
❾ U.S. Marine Corps Barry M. Goldwater Range (Yuma, Yuma County) with 21.4 thousand pounds.
⑩ Navajo Generating Station (Page, Coconino County) with 18.9 thousand pounds.

On-line Access

For national information on data releases, see:
http://www.epa.gov/tri

The TRI data is available through Envirofacts Warehouse, EPA's premier internet site for distributing environmental information at:
http://www.epa.gov/enviro

or the TRI Explorer tool:
http://www.epa.gov/triexplorer

For general information on the Toxics Release Inventory, including reporting requirements for businesses, go to:
http://www.epa.gov/region09/toxic/tri

For more information on the EPA's PBT Chemicals Program, go to:
http://www.epa.gov/opptintr/pbt/

Information and Assistance

We are happy to answer your questions and assist you in learning more about the TRI Program in Region 9.

U.S. EPA Region 9
Nancy Sockabasin, TRI Coordinator
(415) 972-3772

U.S./Mexico Border Report
Arizona Section:
2005 Toxics Release Inventory

U.S. EPA Region 9
Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations

Arizona Section of U.S./Mexico Border

This Report provides data from the Toxics Release Inventory (TRI) for the facilities in Arizona that are located within 100 kilometers (using 70 zip code areas) of the U.S./Mexico Border. The EPA has made public the 2005 data on toxic chemicals that were released to the air, water, and land of Arizona's Border Region.*

Releases and Risk

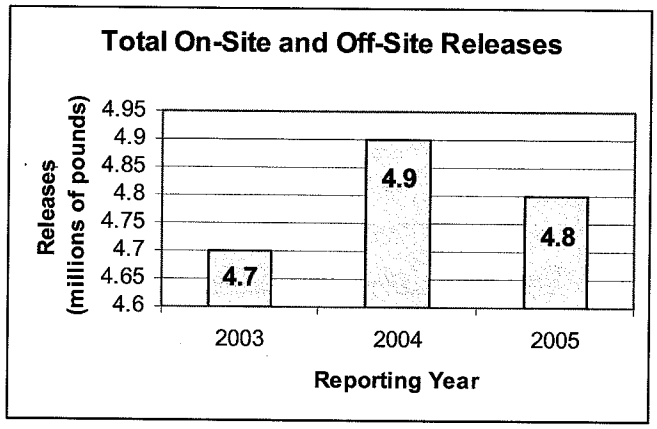
Release is defined as the amount of a toxic chemical released on-site (to air, water, underground injection, landfills, and other land disposal), and the amount transferred off-site for disposal.

It is important to note that releases should not be directly equated with risk. To evaluate risk, release data must be combined with information about chemical toxicity, site-specific conditions, and exposure. In addition, this data does not indicate whether a facility is violating environmental laws. Many of the substances reported through this program are subject to state and federal regulations designed to protect human health and the environment.

A facility is subject to TRI reporting requirements if it: has ten or more full-time employees; is classified under a reportable Standard Industrial Classification (SIC) code; and manufactures, processes, or otherwise uses any of the listed toxic chemicals in amounts greater than the threshold quantities. For most chemicals the thresholds are 25,000 pounds for manufactured or processed, and 10,000 pounds for otherwise used.

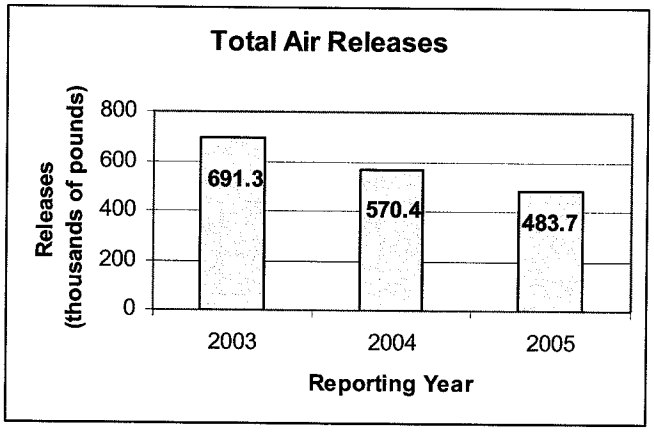
Chemical Releases

Total reported on-site and off-site releases in the Border area of Arizona during the past three years are:**



In comparison to the rest of the state, the Border area of Arizona comprises only 7% of the state's total 65.2 million releases.

Total reported air releases in Border area of Arizona during the past three years are:



** No adjustments were made to account for double counting that could occur as a result of off-site transfers of some TRI facilities also being reported as on-site releases at permitted hazardous waste landfills and other TRI facilities that receive the on-site transfers.*
*** Year to year data comparisons do not reflect changes in reporting requirements.*

Trends in Chemicals Released

In 2005, 69 facilities in the Border area of Arizona reported releases of approximately 4.8 million pounds of toxic chemical to the TRI Program. The following chart tracks releases to the environment for reporting years 2003 through 2005.

Total Releases for Reporting Years 2003 - 2005

Year	Air	Water	On-Site Land	Under-ground Injection	Off-Site
2003	691,295	6,031	3,828,293	0	145,412
2004	570,389	6,204	4,131,827	0	167,523
2005	483,669	5,683	4,054,362	0	220,547

Largest Releases by Industry Type

During 2005, two industries account for 93% of the total 4.8 million pounds of reported releases in the Border area of Arizona. They are:

Industry	Percentage of Total Releases
Copper Mining	80%
Electricity Generation	13%

Largest Releases by Chemical Type

The top five chemicals released in the Border area of Arizona in 2005, ranked by total on-site and off-site releases, are:

Chemical	Release (pounds)	Percentage of Total Releases
Lead Compounds	2,629,605	55%
Chromium Compounds	444,291	9%
Copper Compounds	210,193	4%
Barium Compounds	197,271	4%
Barium	146,566	3%

Facilities Releasing Largest Quantities of Chemicals

Ten facilities, listed in descending order, released the largest total on-site and off-site releases in the Border area of Arizona:

1. Phelps Dodge Sierrita Inc. (Green Valley, Pima County) with 2.3 million pounds (70% lead compound releases).
2. ASARCO LLC Mission Complex (Sahuarita, Pima County) with 1.3 million pounds (77% lead compound releases).
3. Arizona Electric Power Cooperative Inc (Cochise, Cochise County) with 388 thousand pounds (51% barium compound releases).
4. Irvington Generating Station (Tucson, Pima County) with 226 thousand pounds (65% barium releases).
5. Phelps Dodge Mining Co Copper Queen Branch (Bisbee, Cochise County) with 200 thousand pounds (100% copper compound releases).
6. Learjet Inc. (Tucson, Pima County) with 55 thousand pounds (50% ethylbenzene and 50% naphthalene releases).
7. AACCO Cast Products Inc (Benson, Cochise County) with 42 thousand pounds (85% copper releases).
8. Hart & Cooley Inc (Tucson, Pima County) with 38 thousand pounds (100% glycol ether releases).
9. Imation Corp (Tucson, Pima County) with 24 thousand pounds (78% chromium compound releases).
10. U.S. Army Yuma Proving Ground (Yuma, Yuma County) with 24 thousand pounds (49% copper and 49% nitroglycerin releases).

On-line Access

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http://www.epa.gov/enviro
or the TRI Explorer tool:
http://www.epa.gov/triexplorer

U.S. EPA Region 9 TRI Program
Mariela Lopez (415) 972-3771

2335

Steve_in_Arizona
<nitroxer2003@yahoo.com>

04/01/2008 01:19 PM

To: Comments-southwestern-coronado@fs.fed.us
cc:
Subject: Comment: Rosemont Mine (Significant Public Health Risk Exists. Part I)

For NEPA EIS Consideration, I present the following comment for the record. Please enter my comment, the supporting (preface), and attachements into the public NEPA record.

I am concerned with the health and safety of the people and wildlife of the Santa Cruz Valley and Santa Rita mountains. At first let me reference a quote from the Saturday, February 24, 2007, meeting in Tucson, Arizona of the Committee on Natural Resources of the U.S. House of Representatives of the 110th Congress, First Session.

Statement of Chuck Huckelberry, Pima County Administrator (this contains data regards irreparable harm already caused by open pit copper mining in our area; harm to people, wildlife, and the land. Please read the following then my comments below the quote.
"H. Public Health Risks

Active copper mines release other toxic substances in the course of crushing and concentrating the ore-bearing rock. The Environmental Protection Agency's (EPA) Toxic Release Inventory indicates that Phelps-Dodge's Sierrita Mine near Green Valley released 1,053 pounds of mercury and 1,243,048 pounds of lead in 2004. The Mission Mine, operated by ASARCO, a subsidiary of Grupo Mexico, emitted 1,211,184 pounds of lead in 2004. It is located near Sahuarita. Over 100 miles of streams in Arizona are considered impaired by excessive copper, which can be toxic to aquatic organisms. Arizona's mines are the largest known sources of impairments for rivers and streams ¹².

\12\ National Assessment Database, Environmental Protection Agency.

Processing methods for copper can enhance the concentration of naturally occurring radioactive materials coming from mines. EPA has compiled data regarding the concentration of radioactive substances in the Arizona copper belt. The results show that certain common mining practices can concentrate soluble pollutants such as uranium and thorium in groundwater ¹³. Elevated levels of uranium have been detected in groundwater at Phelps-Dodge's mines near Green Valley. EPA and ADEQ are looking into the issue and have requested that Phelps-Dodge respond.

\13\ U. S. Environmental Protection Agency, 1999. Technologically Enhanced Naturally Occurring Radioactive Materials in the Southwestern Copper Belt of Arizona. Office of Radiation and Indoor Air, EPA 402-R-99-002.

High levels of sulfate and other non-toxic salts have entered groundwater in Green Valley from the Sierrita Mine. There is no enforceable health standard for sulfate, but it can cause problems with taste and digestion. As a result of concern expressed by Green Valley residents, Phelps-Dodge is providing a temporary replacement for two wells in the sulfate contaminant plume owned by Community Water in June 2005 until a permanent solution is developed and implemented.

Many of the mining facilities also have the potential to generate large amounts of dust. Such dust, or PM10, is one of the most serious air quality health concerns in Pima County and can cause a variety of health problems, including breathing difficulties, respiratory pain, reduced lung function, weakened immune system, increased severity of acute bronchitis and asthma, heart attacks, and premature death (1 to 8 years).

Pima County has been interested in acquiring BLM's surplus 540-acre Saginaw Hill property for park purposes since the 1980s because of its excellent location in a growing region of the County, but has been unable to do so because the property includes the toxic remnants of mining activities that began in the late 19th Century and continued into the 1950s. A limited environmental assessment conducted for Pima County in 1988 found problematic levels of a number of metals on the Saginaw Hill property, including aluminum, cadmium, copper, lead, and zinc. Acidic vapors were also noted on the site, and a variety of physical hazards were also present, including adits, shafts, test pits, tailings piles, and slag dumps.

A 2005 study conducted by BLM at Saginaw Hill detected several chemicals of concern on the property, including arsenic, lead, antimony, copper, mercury and thallium. The study found that ``Concentrations of these metals in waste material significantly exceed all risk-based guidelines and therefore pose a potential threat to human health and the environment." In addition, groundwater is contaminated in the direct vicinity of one of the property's mining sites, raising concerns about impacts to the surrounding area's drinking water. BLM is actively pursuing the remediation of the site, but even the most bare-bones solution is expected to cost more than $2 million, and its ultimate efficacy remains in question."

Comment:

Evidence exists for significant pollution with public harm to include disability and death from open pit copper mining. The nature of the business life of the mines is short; and, the mines are not held responsible for the damage they do. Rather they are shielded by bankruptcy laws while the toxic air and ground water releases they cause continue to plague the community. These releases include lead, mercury, and radioactive elements (tenorm).