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Subject: Water Questions and Comments- Rosemont Copper Project Comments
Groundwater Protect July 18th 2008
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Attachments: [Fox11HelpUs1.jpg](#)

CNF Rosemont Copper Project
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Post July 14th 2008 Comments
July 18, 2008

Although it has been widely publicized by the CNF that comments received after July 14th 2008 will be accepted, I still have concerns that they will be treated differently and will not receive equal legal weight. That being said, here are my comments on the Groundwater Protection Plan Portion of the MPO by Tetra Tech and Montgomery and Associates Dated June 2007. Some of my comments may deviate from the title as when reading through the project book the descriptions may spark other thoughts. Additionally, many of these books have cross-over so I may repeat comments or questions from previous ones I have turned in to the comment section.

2.0 Overall Concept P.2

Zero Discharge-Can any facility be managed for zero discharge? Are there examples of any current mining facility that has zero discharge? If so, please provide these data in a way that a lay person may view and understand it. It seems to be a common practice to "take the fine" rather than cure the problem. I propose that bonding or mitigation costs be set to a level that Rosemont Copper or any future assignees will be adverse to that sort of practice.

3.1 Tailings Deposition: P. 3

"About" 19 years. What sort of guarantee the project will last 19 years? This is not the only location in the MPO that has this generalization. What guarantee does the community have that this NEPA process is not being used as a way to segment or "piecemeal" other components of Augusta's

long term plan as stated in it's SEC and in various press releases of other deposits located nearby? It is my understanding that while segmenting may on occasion be a valid use that in this case it would not be an acceptable use of NEPA.

Additionally, if Augusta does sell this project to another corporation, how will that affect whatever permits it receives under this NEPA process? Will it make it easier for that corporation to receive future permits through the NEPA process? How will this NEPA process and potential acceptance affect future foreseeable actions in the area.? IE by bringing in new infrastructure such as water and electric lines will this encourage higher density development on the west side of the Santa Ritas where there are Conservation goals per the SDCP and the Santa Rital Experimental Range? How would this water line and electric permitting affect the existing grazing lease holders? (see section 4.0 below for related questions)

Chemical Dust Suppressants or binders-What specific sort of dust suppressants or binders? Please list these and associated environmental/health/air quality impacts and associated traffic/hauling impacts. Would they be sprayed or mixed into the tailings and would this increase the moisture content if it were mixed? What would be the wind requirements to spray these? We have many windy days here.

If the suppressant is water, how would this affect the moisture content and "liquefaction" of the tailings? Will this increase the potential for tailings failure? I would suggest a study, not a paper modeling study, but a study on an existing facility, in similar circumstances which shows at what point failure can occur from the addition of a water dust suppression from liquefaction.

As the dry tailings, according to my understanding, have not been tried in a climate with this high of a rainfall, what will happen if the suppressant is sprayed, and then it all runs off in the rain? Will it have to be reapplied? What will the environmental impacts of that be? What happens to the wildlife (to include insects, amphibious creatures and so forth if they drink water with chemical suppressants?)

How will the chemical dust suppressant affect the growth of revegetation if revegetation is supposed to be concurrent with tailings disposal?

4.0 Water Supply P. 7

What if Rosemont Copper is unable to acquire the permits that are needed through the Arizona State Land Department for its water line on the west side of the project? Where will it acquire its water then? What will happen to the properties it has purchased in the Sahuarita Heights area? If the water is acquired on the east side, where would that be? Would it be from the Cienega Basin? If that happened, how would it get there?

Rosemont Copper has stated in its MPO that it has to use effluent if it is available. There is reclaimed water close by on the West side of the Santa Ritas. (closer and more feasible than the CAP line anyhow). I would like a full study and investigation of this alternative.

7.3 Monitoring Plan

Monitoring should be paid for by Rosemont Copper and or/any future assignees but the agency should be selected by an independent committee selected by ADEQ, a local neighborhood association and a local non profit association with ties to water quality issues. Additionally, enough bonding should be required for testing to occur for the life of the project, for 50 years after the close of the project and for any potential mitigation should there be an issue with water quality.

Not numbered or mentioned. (Perhaps it is listed in another section and I missing it?)

How will the project prevent wildlife from trying to access these poison water areas? Will there be walls? Fences? I have miniature cattle and have done extensive research with the USDA on how to keep Mountain Lions away from my cattle. There really is no fencing to keep out big cats so we use a combination of 6-7 foot stock flimsy stock fence with a cattle guard dog. How does Rosemont propose to keep Big Cats away from the water that has chemicals in it? I suggest two tiers of protection. One layer of electric flagged fence and then a ten foot deer fence around any potential areas of poisonous water. This should keep deer and cats out.

Additionally, this will keep the cattle from roaming around and drowning on site, because let me assure this happens. The fencing would have to be appropriate for other circumstances as well and a fencing person would to

be consulted. The other alternative would be the dome option below. That is predominately for the poison water, whereas the fencing would serve the purpose of keeping the cattle from drowning in ponds that were not designed correctly as well. (so they can get back out)

I am also concerned about smaller animals such as amphibians, rodents, reptiles and flying critters such as bats and birds. I propose, along with the idea below that there is a mitigation/monitoring program with Pima County, Game and Fish and the Audubon Society to assure that the bird counts do not suffer aside from having the project as is.

I propose a dome which can be opened and closed and used in conjunction with solar still desalination distilling to produce more fresh water. This should prevent more flying animal deaths as well as saving on ground water pumping. It will also save on electricity for water production as the water would be produced on site for the employees to drink and shower in and gravity feed could be used from the tanks.

Please describe in detail, the proposed mosquito mitigation techniques for the small sedimentation ponds described in the Groundwater Protection Plan.

I would like to know why ADEQ, Army Corps of Engineers and ADWR have not been available for the public to question more in depth about these issues and have not been asked to be cooperating agencies earlier in the process? In March of 2008 I requested that there be participation by cooperating agencies. It is difficult for the lay person who is not educated in these things to formulate questions when the cooperating agencies are not there.

I would like to see a comprehensive, easy to read list with a map key

1. All of the wells ownerships records within a 10 mile area of the proposed project (from the pollutant management area line in figure 05) and the class of well and depth and any other recorded information.

1A. If the information is available, I would like to see if they are fissure or aquifer type well.

2. All of the surface water rights holders records within a 10 mile ares of the proposed project (from the pollutant management area line in figure 05)

3. The AMA's as an underlying map zone

4. The exact permits that will be required that are required by any water

type organization, whether it be County, State or Federal

What affects will blasting have on fissure type wells in the area?

What guarantee do we have that Rosemont Copper or any future assignees will not use their Exempt wells on the east side for mining purposes? I propose that there is a neighborhood group (paid for by Rosemont Copper or any future assignees) who visits the site every six months and inspects all of the pumps to be assured they have not been upgraded beyond a certain size, yet to be established. If the corporation is caught in violation of said size, then they will have to pay a fine, yet to be determined, to the local community, and the well will be closed.

Will there be fissures in the road from the groundwater use? In Willcox Arizona they have had to close roads from fissures. We in the neighborhood have noticed quite a few drill rigs lately, what are they drilling and how many permits do they have for the east side? There has been a bright light from MP 44 that can be seen clearly to past MP 49/50 for the last couple of weeks. We notices last night at MP 44 that is actually 3 bright lights but we can only see 1 bright light from the roads up around MP 49/50 from teh drill rigs.

That is the end of my questions and comments for the Groundwater Protection Plan for today, July 18th 2008.

For the record, I would like to state that the injustice that has occurred by not allowing the Vail/Cienega Corridor to have a hearing is inexcusable. The rumor that is circulating amongst politicos that it is the fault of one volunteer is even more inexcusable. It is my understanding from the spirit of NEPA that it is to see who are the interested parties.

If certain communities are unaware that an action may take place, than they cannot be interested. Education is very important and by holding so many of these meetings while the Vail Unified School District was on breaks or out of the area the CFS has failed to engage an important affected area. Additionally, I cannot speak for everyone so I cannot know how the data will be skewed for the neighborhoods that were excluded from the process.

I can speak for my own experience when I say that we receive one TV station and that is KGUN 9. (ABC). I would not have seen any of the last

weekend's news coverage (July 12th and 13th 2008) if I had not know about it and gone to someone else's house to view it. We do not have a library or community center within our 425 square mile boundaries either.

Please view the attached photo on July 13th 2008. which shows the people of the Vail/Cienega Corridor Requesting a hearing on July 13th 2008.

Elizabeth Webb
Vail/Cienega Corridor.

