



# Maricopa Audubon Society

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April 3, 2008

Rosemont Copper Project, Coronado National Forest  
300 W. Congress St.  
Tucson, Arizona 85701

Fax: 520 388-8305

Dear Coronado National Forest

On behalf of the 2300 members of the Maricopa Audubon Society in central Arizona we would like to submit the following scoping comments regarding the proposed Rosemont mine in southern Arizona. Our members spend many hours every year in the Coronado National Forest. These involve wildlife and natural history study. We schedule organized chapter field trip to areas throughout southern Arizona, and including many within the Coronado NF.

We wish to state that the Forest Service should NOT revise the Forest Plan to accommodate mining. The 1872 Mining Law does not require the Forest Service to revise the plan to accommodate mining. If Augusta's Mining Plan Operation (MPO) cannot meet the current standards and requirements of the Forest Plan, then the Forest Service must deny the plan.

- \* Extend the time period for comments by 30 or 60 additional days.
- \* Please schedule additional meetings to work on the scope of the EIS. And allow the public to speak at those meetings.
- \* Please schedule additional meetings in Vail and Sonoita, both areas with major impacts from the proposed mine.
- \* Pima County, the Arizona Department of Environmental Quality, and the Arizona State Office of Historic Preservation should be included as "cooperating agencies," at a minimum in the EIS process.
- \* We are aware that the Rosemont Copper Project would be located 30 miles southeast of

Tucson, in Pima County, on approximately 995 acres of private land; 3,670 acres of National Forest land; 15 acres of land administered by the Bureau of Land Management and 75 acres of State Trust land.

\* With the outdated 1872 Mining Laws still in place, an estimated 230,000 acres of public land in Arizona have already been sold to private interests for \$2.50 or \$5.00 per acre.

\* We are aware that the EPA reports that in 2005, metal or hardrock mining in Arizona released over 39.4 million pounds of toxins.

\* Pima County commissioned and submitted a hydrogeological study to the Coronado that raised the threat of surrounding groundwater and surface water depletion from pumping out an open pit copper mine, as well as potential leaching of pollutants into groundwater.

\* The Sky Islands of the Coronado National Forest are a globally recognized biodiversity hotspot.

\* The Santa Rita Mountains and surrounding desert and grassland seas are globally recognized for the diversity of birds, reptiles, amphibians, bees and plants.

\* Augusta has no track record in mining and the mining industry has a dismal environmental record.

\* Augusta wants to fill in Barrel, Wasp, McCleary, and Scholefield Canyons, yet claims no impact to the Cienega Creek watershed.

\* Of the 117 million dollars Augusta claims in community commitments, 67 million dollars of that is actually just costs associated with the business of mining.

\* Augusta claims 350 jobs, but mining jobs are transitory as part of the mining bust and boom cycle. In reality, the mine will recreate opportunities and the jobs that depend on them will be lost forever.

\* negative impact on the local tourism based economy

\* noise pollution, air pollution and water contamination

\* increased truck traffic on local roads and highways

\* destruction of wildlife habitat, wildlife movement corridors, native plants and ecosystems

\* elimination or restriction of biking, hiking, hunting, camping, and bird watching

\* irreparable devastation of the scenic landscapes and viewsheds

#### **WATER:**

Although efforts are made to contain tailings piles and other sources of runoff, leaching of exposing tailings surfaces or waste dumps, and unintended leaks from other facilities are common occurrences at mine sites. This could result in the release of potentially 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.

There is every likelihood that a mine -- a Rosemont Ranch as is being proposed -- would dewater wells currently in use (as has already been done by Augusta Resource Corporation test wells) and imperil important wildlife habitat and future drinking water sources for residential use.

#### **AIR:**

The area currently has excellent air quality. Tailings and waste piles will be sources of dust, which prevailing winds will blow toward major new residential developments east of the Tucson basin. Air quality in the National Forest and surrounding residential areas will be degraded by both dust and truck exhaust associated with mine operations.

#### NOISE:

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

#### SCENIC VIEW:

This mine will be visible from State Highway 83, a designated State Scenic Highway, for 3 miles out of the 24-mile trip from I-10 to Sonoita. The 3-mile segment includes the portion of the highway where it gains its greatest elevation above the surrounding land, at which point drivers are 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.

#### 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.

#### PROPERTY VALUES:

The areas south of the mine site have developed into high-end rural residential ranches and ranchettes. New developments are found north and east of the area. An open pit mine will severely impact the quality of life and reduce property values in those areas. The Sonoita Valley, a weekend tourist destination, could be thrown into the boom-bust economy typical of western towns adjacent to large mining operations.

#### RECREATION:

The Rosemont Valley is heavily used by mountain bikers, hikers, off-highway vehicles, bicyclists, and hunters. Recreational use would be forced to move to already heavily used areas, creating conflict with growing subdivisions. The additional loss of recreational lands will aggravate our increasingly crowded public lands associated with Pima County's population growth, and decrease the quality of recreational experiences.

#### WILDLIFE AND WILDLIFE HABITAT:

Intensive development of the site as an open pit mine will result in loss of a significant portion of the wildlife habitat and movement corridor on the eastern side of the Santa Ritas, potentially impacting endangered, threatened, and candidate species, in addition to priority vulnerable species or species of special concern. 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.

There are several priority vulnerable species that are known to occur at Rosemont Ranch including two Endangered Species: the Lesser Long-nosed bat (*Leptonycteris curasoae yerbabuenae*) and Pima Pineapple Cactus (*Coryphantha scheeri robustispina*). In addition, other

special status species are known to occur there: Chiricahua Leopard Frog (*Rana chiricahuensis*), listed as threatened, and the Yellow-billed Cuckoo (*Coccyzus americanus*), a candidate for listing.

There are six others priority vulnerable species or Wildlife of Special Concern known to occur in the Rosemont Ranch area, according to the AZ Game and Fish Department: Mexican Long-tongued Bat (*Choeronycteris mexicana*), Western Red Bat (*Lasiurus blossevillii*), Lowland Leopard Frog (*Rana yavapaiensis*), Giant Spotted Whiptail Lizard (*Cnemidophorus burti stictogrammus*), and Rufous-winged Sparrow (*Aimophila carpalis*). The Mexican Spotted Owl (*Strix occidentalis lucida*) may also occur there, based on its habitat requirements.

#### ECONOMICS:

Any economic benefits of the mine will be offset by the negative impacts to tourism-related businesses dependent on the area's scenic beauty. Mine employment may be partially or offset by the impact of the mine on recreational and scenic values which might otherwise have lured companies into relocating to Southern Arizona and the long-term deleterious effects of mining's boom-bust economies.

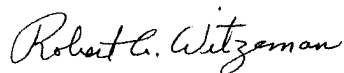
A recent study by the Sonoran Institute shows that a mine at Rosemont would have serious economic impacts to the surrounding communities. The report found:

\*" ..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.

Thanks you for this opportunity to respond to this project. Please keep us informed regarding all planning and public input phases take place.

Sincerely,



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