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and Desert Seas

## **ROSEMONT MINE Problems with the Draft Environmental Impact Statement (DEIS)**

### **Water Quality**

- The DEIS contains no specific replacement strategies for any seasonal or perennial springs that dry up due to the mine's groundwater pumping or dewatering of the aquifer to create its open pit.
- The DEIS must contain a systematic evaluation of the registered wells in the vicinity of Rosemont's production wells to determine which ones could be dewatered.
- The DEIS does not discuss the possibility that the mine's groundwater pumping may result in Sahuarita's local water demand exceeding their future potential supply.
- Rosemont's proposed locations for recharge of Central Arizona Project water to mitigate for groundwater pumping are too far downstream of where it would pump groundwater to offset the expected drawdown of the aquifer from mine pumping.

### **Water Quantity**

- The DEIS doesn't analyze or discuss impacts to stormwater flowing off-site as a result of mining impacts, even though "seepage is expected to occur from the dry-stack tailings facility." (Exec. Summary at xxiii) Only conceptually does the current modeling show that this seepage will not exceed applicable water quality standards, and more analysis needs to be done on whether the proposed treatment system will work.
- The DEIS contains no descriptions of protective covers or other measures to prevent injuries or deaths to migratory birds exposed to acidic mine pond waters.
- The DEIS contradicts itself when it accepts as a mitigation measure for groundwater pumping Rosemont's proposal to encourage infiltration of water through waste rocks and tailings into the aquifer ("Small retention structures would be constructed on waste rock structures to facilitate infiltration of stormwater and contribute to local groundwater recharge." (DEIS at 75.), but also concludes that groundwater quality will not be affected by such infiltration because it will be "negligible." (DEIS at 287)

### **Springs, Seeps, and Riparian Habitats**

- The DEIS must provide more analysis on the mine's water-use impacts on seeps, springs and riverfront plants, and on potential erosion and stream-flow alteration.
- The DEIS's assertions that a pumping-drawdown of less than 5 feet under Davidson Canyon and Cienega Creek and of 1- to 3 percent reductions in Cienega Creek's flows is minor is unsupported by documentation, particularly because the DEIS fails to adequately consider the combined impacts of the mine's groundwater pumping, continued drought, and the increasing effects of climate change.

### Air Quality

- The DEIS states that emissions from the mine could cause the area's levels of some pollutants to exceed federal standards, but it does not discuss what measures are needed to control emissions of fugitive dust from mine tailings or other operations.
- The DEIS fails to explain the effectiveness of the voluntary air pollution mitigation measures proposed by Rosemont.

### Cultural Resources

- According to the Tohono O'Odham Nation, mitigation for the destruction or removal of cultural sites is not possible, and the sheer number of sites likely to be destroyed or seriously damaged by the mine project is unacceptable. In light of this, the DEIS should discuss the measures required to ensure all cultural sites are avoided.
- The DEIS must discuss the potential loss of human burial remains and associated burial objects beyond just promising that a “plan of action” will be created at a later date.. The DEIS should outline how this proposal complies with applicable federal laws.

### Dark Skies

- The DEIS must analyze not only the impacts to astronomy and stargazing, but also potential disruptions to circadian functions that regulate the biological clock of people and animals.

### Transportation

- The DEIS fails to adequately analyze the mine's impacts on roads, and limits those impacts to Highway 83 when mine trucks will be carrying heavy equipment and material to the Port of Tucson at Kolb and Valencia roads, and will also be traveling on I-10. The analysis should provide costs for maintaining and upgrading these roads in addition to Highway 83.
- The report's reliance on Rosemont's promises to start a program that will put 75 percent of its employees into carpools is highly speculative and likely unenforceable. The analysis should not rely on this mitigation actually occurring when discussing impacts to roads.

### Reclamation

- The DEIS does not include information on Rosemont's planned mine reclamation efforts. This information should be disclosed to the public prior to the agency issuing the final EIS. The DEIS should also identify bond amounts required from Rosemont for mine closure and reclamation activities.
- The DEIS's statement that reclamation is expected to be successful and approach historic vegetation conditions in 100 years is likely incorrect and is plainly contradicted in other sections of the DEIS, including the Executive Summary, which states ““The tailings and waste rock piles may be unstable over time, and reclamation may not adequately result in a stable, revegetated landscape. The...tailings and waste rock piles may not support native vegetation.” (Exec. Summary at vii)