

# Rosemont Copper Mine

## Objection Review

**Objection # (s):** 0010-BManderscheid; 0011-CKestler; 0025WBunting; 0036-Rosemont; 0063-DianeMeyer; 0066-JHoffman; 0069-BKanner; 0070-MLove; 0109-SWind;

**Resource Area(s):** Visual Resources – General (VR-1)

### Objection Issue:

- 0011-3: Even with recent compromises, the mine will definitely destroy a significant area of the Santa Rita Mountains, making waste one of the most beautiful areas we have left.
- 0069-2: This section on visual resources makes multiple comments validating that restoration to the Santa Rita's natural and original appearance is not possible.
- 0025-13: It is an absolute and logical absurdity that this vast proposed open pit copper mine project located immediately adjacent to SR 83 for several miles will not significantly impact the roadway's current invaluable and irrecoverable visual resources.
- 0063-3: The high voltage lines to supply power for the Rosemont mine will mar the present unobstructed view to the east.
- 0070-1: This section on VISUAL RESOURCES makes multiple comments validating that restoration to the Santa Rita's natural and original appearance is not possible.
- 0109-2: The FEIS because does not adequately address my concern of the negative impact on the scenic Santa Rita Mountains of the huge tailings piles the mine will create.
- 0010-1: There have been times in the past when the San Manuel mines were in full operation and a thick haze would drift between the Rincon and Catalina Mountains and cover the eastern valley of Tucson. In the 1980s when I lived I the lower foothills, I had a clear view of the Santa Rita Mountains to the south. Development, drought with subsequent dust, and emissions from various sources have now made that impossible. To state that the Rosemont Mines will not add to the visual and environmental pollution is naive and simply not possible.
- 0036-17: This bullet makes no sense in this context. (DROD, page 39, number 2 under Visual Resources)

### Remedy Supplied by Objector (if any):

0011-3: Deny Rosemont Copper's permit application.

0109-2: Choose no action.

**Law, Regulation and/or Policy:** Council on Environmental Quality (CEQ) Regulations at 40 CFR 1500-1508; General Mining Act of 1872; FSM 2380; FSH 462; FSH 701

**Review Team Member Response:**Response to objection issues 0011-3, 0025-13, 0069-2, 0070-1, 0109-2, 0010-1

The objectors state that there will be a negative impact on the Santa Rita Mountains and that restoration to the Santa Rita's natural and original appearance is not possible. Additionally, Objection 0109-2 states that the FEIS does not adequately address concerns of the negative impact on the Santa Rita Mountains from the mine tailings, and Objection 0025-13 refers to impacts to SR-83's visual resources.

These objections have no merit, because the Forest Service disclosed and analyzed impacts to visual resources, and developed mitigations for impacts where possible. These issues were previously addressed in the FEIS volume 6 Appendix G Summary of Response to Comments on the DEIS [PR 047511\_7, p. G-47].

The impacts to visual resources from the mine pit, tailings, and waste rock and associated facilities were identified as a significant issue in the Draft Record of Decision (R)OD [PR 047511\_2, p. 22]. The Required Disclosures section of the FEIS states that "...the mine pit, tailings facility, and waste rock facility would permanently alter the scenic landscape and affect the scenic quality of the area in perpetuity" [PR 047511\_4, p. 1133]. The Unavoidable Adverse Effects section of the FEIS states that "The mine pit and residual tailings and waste rock facilities would constitute a permanent adverse impact that cannot be avoided or completely mitigated" [PR 047511\_4, p. 1136].

In the Irreversible and Irrecoverable Commitments of Resources section of the FEIS, the impacts to visual resources are described as follows:

"For all action alternatives, there would be an irretrievable loss of scenic quality from increased access roads and commuter and truck traffic during the premining and active mining phases of the mine. There would be a loss of scenic quality to the existing view of the Santa Rita Mountains caused by the upper pit face, pit haul roads, and pit diversion channel cut slope color contrasts until permanent timescale rock weathering has reduced these contrasts. The size and extent of the waste rock and tailings facilities would create losses of scenic quality until rock weathering and slope revegetation have reduced color, form, line, and texture contrasts to a degree that they blend in with the surrounding landscape. Due to the geological time frame necessary for these processes to occur, the loss of scenic quality associated with the waste rock and tailings facilities would effectively be irreversible.

There would be an irretrievable loss of scenic quality along SR 83 and along Santa Rita Mountain west slope roads until the power lines are removed at the time of mine closure. For each action alternative, the visual contrasts that would result from the introduction of facilities associated with the project would be an irretrievable loss of the undeveloped, semiprimitive setting until the project is closed and full reclamation is complete. Under

all of the action alternatives, existing views of the Santa Rita Mountains would be irreversibly lost behind the waste rock and tailings facilities because of the height and extent of the piles” [PR 047511\_4, p. 1140].

Furthermore, visual impacts are described and analyzed in the Visual Resources section of the FEIS [PR 047511\_4, pp. 767-833]. This section of the report affirms that there will be short term, long term, and permanent impacts to scenic quality common to all action alternatives. Short term impacts would result from mine construction related activities and initial mining years. Long term impacts would result from mine operations, most significantly from the waste rock, tailings, heap leach facilities, open pit, and pit face. Other mine infrastructure and road systems would contribute to the long term impacts. Permanent impacts include unnatural landforms, fewer vegetated areas, and light-colored exposed rock. In response to objections 0025-13 and 0109-2, the Visual Resources section addresses impacts to the views from SR 83 and tailings specifically:

“Additionally, the waste rock and tailings facilities would permanently obscure portions of foreground and middle ground views of the Santa Rita Mountains from parts of SR 83, the Arizona National Scenic Trail, and Box Canyon Road. Background views of the mountain range would be partially obscured from Hilton Ranch Road and other portions of SR 83” [PR 047511\_4, p. 800].

Mitigations have been proposed to offset the impacts of short term and long term impacts [PR 047511\_6, pp. B-60 to B-62; p. B-97; pp. B-8 to B-11; pp. B-11 to B-14; pp. B-14 to B-15; pp. B-28 to B-29; p. B-33; and p. B-63].

The proposed remedies for objection 0109-2 of “Choose no action,” and for objection 0011-3 to “Deny Rosemont Copper’s permit application,” have no merit. Under the General Mining Law, claimants have a statutory right to conduct mining activities in compliance with Federal and State statutes and regulations [PR 047511\_2, p. 7]. The Rosemont Copper Company is exercising its statutory rights to conduct mining activities. The Forest Service’s agency in this matter is summarized in the response to comments [PR 047511\_7, p. G-47].

#### Response to objection issue 0063-3

This was previously addressed in the FEIS volume 6 Appendix G Summary of Response to Comments on the DEIS [PR 047511\_7, p. G-46]. It was also identified as a significant issue in the Draft ROD, as follows: “The facilities may block valued mountain views. The processing plant, roads, and utility corridor could also affect visual resources in the area. The character of the SR 83 designated scenic corridor and the views from it may change” [PR 047504, pp. 22-23].

The Required Disclosures section of the FEIS identifies these effects as short term, which would “...cease when they are removed at closure...” [PR 047511\_4, p. 1133]. The Visual Resources section of the FEIS categorizes visual impacts from the power transmission line as long-term, but not permanent, as these utilities will be removed [PR 047511\_4, p. 799]. On pages 801-802 of the Visual Resources section, visual impacts from the power transmission line are discussed in detail. The power transmission line is described as having impacts that are “...adverse and major

to scenic quality in the long term, when viewed generally from forest roads in the area...” [PR 047511\_4, p. 801]. Once the mine is closed, “Permanent impacts to scenic quality from the power transmission line would be weak to none” [PR 047511\_4, p. 802]. Mitigation BR-06 specifies that the power transmission line will not be constructed on the ridgeline, reducing long-term visual impacts [PR 047511\_4, p. 33].

Response to objection issue 0036-17

The bullet referred to by the objection is as follows:

“2. All areas will be surveyed for the presence of contaminants, and any contaminated soils, reagents, or fuels and any contaminants will be disposed of offsite at licensed facilities” [PR 047511\_2, p. 55].

This likely was placed under Visual Resources because this requirement is always paired with the removal of structures upon closure, which is a Visual Resources mitigation measure [PR 047511\_4, p. B-60].

**Recommended Remedy by Review Team Member** (if any): The remedies suggested by the objectors are not warranted. No remedy is required.

**Review Team Member:** Jessica Dunn, Recreation, Heritage, and Wilderness Resources