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Agriculture

Forest  
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COPY FOR YOUR  
INFORMATION

File Code: 1950/2810

Date: May 3, 2012

C. H. Huckelberry  
County Administrator  
Pima County, Arizona  
Pima County Governmental Center  
130 W. Congress  
Tucson, AZ 85701-1317

Dear Mr. Huckelberry:

The Coronado National Forest has received your information from April 5, 2012, in response to a request dated March 2, 2012. The Forest appreciates the responsiveness of Pima County in providing additional information as the Forest reviews public comments and considers revisions that may be needed for the EIS regarding the Rosemont Copper Project.

At this time, the Forest would like to request several additional items from Pima County to address similar and new issues:

#### Hydrographs for Dr. Myers Model

We appreciate the additional information provided by Dr. Myers. However, it was hoped that in addition to the tabular summary provided by Dr. Myers in his April 5, 2012 memo, actual graphic hydrographs could be provided for the same monitoring points. The reason for this request is so that the Forest can better identify the timing of potential impacts at sensitive areas, rather than relying on the limited "snapshots" of 20, 50, 150, and 1,000 years.

Similar hydrographs have been provided for the other two models commissioned by Rosemont, and the Forest would like to have identical output for all models considered in the EIS.

#### Hydrographs of Sensitivity Analyses

The Forest is considering revising the presentation of model results in the EIS in order to better describe the uncertainty associated with the groundwater flow models. Specifically, the Forest is considering presenting the upper and lower bounds of the sensitivity analyses as part of the model results.

For instance, instead of stating "Drawdown at Empire Gulch is modeled to be 3.2 feet after 1,000 years, with drawdown beginning approximately 90 years after start of mining," the Forest is considering stating the following: "Drawdown at Empire Gulch is modeled to be 3.2 feet after 1,000 years; sensitivity analysis show this drawdown could range from non-existent to XX feet. Drawdown is modeled to begin approximately 90 years after start of mining; sensitivity analysis shows that drawdown could begin from 60 to 120 years after start of mining."



ossible, the Forest requests that additional hydrographs be provided for the same 15 locations, presenting the upper and lower bounds of the sensitivity analyses. These same sensitivity analysis hydrographs have recently also been requested for the two models commissioned by Rosemont.

#### Water Quality Data for Lower Davidson Canyon

One concern expressed by Pima County and other commenters during the public comment period is that impacts to the Outstanding Arizona Water in lower Davidson Canyon were not adequately addressed. As you know, one important aspect of assessing potential degradation of an Outstanding Arizona Water involves comparisons to "existing water quality."

The Forest intends to compile all available sources of water quality from lower Davidson Canyon. Three specific sources are being investigated: ADEQ, Pima County, and Rosemont. At this time it does not appear that ADEQ has any available water quality data for lower Davidson Canyon. Rosemont has conducted some sampling and provided those data to the Forest. The Forest understands that in the past Pima County conducted sampling in preparation for nomination of the Outstanding Arizona Water.

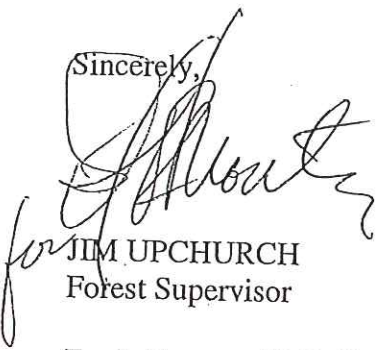
This water quality information is important for the analysis of potential impacts to lower Davidson Canyon. The Forest would like to request that Pima County provide any water quality information for this area that may be available, published or unpublished.

#### Peer Review of Myers Model

Comments submitted during the public comment process indicate that the model constructed by Dr. Myers underwent a peer review by Stan Leake of the U.S. Geological Survey. The Forest feels that providing details of this peer review would be useful for presentation in the EIS, similar to the peer review described for the other two models commissioned by Rosemont. The Forest would like to request any details or documentation resulting from this or any other peer review of Dr. Myers' model.

Thank you for your continued assistance in providing information and comments for this project. If you have questions, contact Mindee Roth, who will coordinate with specialists from the Forest and/or SWCA to provide any clarification that may be required. Ms. Roth can be reached at (520) 388-8319 or mroth@fs.fed.us.

Sincerely,

  
for JIM UPCHURCH  
Forest Supervisor

Ec; J. Fonseca, N. Fyffe