



## Coalition for Sonoran Desert Protection

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Arizona Center for Law  
in the Public Interest  
Arizona League of  
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Bat Conservation  
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Conservation Organization  
Environmental Law Society  
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Friends of Saguaro  
National Park  
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Gates Pass Area  
Neighborhood Association  
Native Seeds/SEARCH  
Neighborhood Coalition of  
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Northwest Neighborhoods  
Alliance  
Oro Valley Neighborhood  
Coalition  
Protect Land and  
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Safford Peak Watershed  
Education Team  
Save the Scenic Santa Ritas  
Sierra Club—Grand Canyon  
Chapter  
Sierra Club—Rincon Group  
Silverbell Mountain Alliance  
Sky Island Alliance  
Sky Island Watch  
Society for Ecological  
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Sonoran Arthropod  
Studies Institute  
Sonoran Permaculture Guild  
Southwestern Biological  
Institute  
Tortolita Homeowners  
Association  
Tucson Audubon Society  
Tucson Herpetological  
Society  
Tucson Mountains  
Association  
Wildlands Network  
Women for Sustainable  
Technologies

January 18, 2012

Mr. James Upchurch, Supervisor  
Coronado National Forest  
P.O. Box 4207  
Logan, Utah 84323 - 4207

### RE: Draft Environmental Impact Statement for the Rosemont Copper Project

Dear Mr. Upchurch:

I am writing in response to the request for public comments on the Draft Environmental Impact Statement (DEIS) for the Rosemont Copper Project. The Mine Plan of Operations for the Rosemont Copper Project proposes to impact 3,670 acres of land in the Coronado National Forest, along with private lands, Bureau of Land Management lands, and Arizona State Trust lands.

I submit the enclosed comments on behalf of the Coalition for Sonoran Desert Protection, founded in 1998 and comprised of 40 environmental and community groups working in Pima County, Arizona. Our mission is to achieve the long-term conservation of biological diversity and ecological function of the Sonoran Desert through comprehensive land-use planning, with primary emphasis on Pima County's Sonoran Desert Conservation Plan. We achieve this mission by primarily advocating for: 1) the protection and conservation of Pima County's most biologically rich areas, 2) directing development to appropriate land, and 3) requiring appropriate mitigation for impacts to habitat and wildlife species.

**First and foremost, we support the comprehensive and detailed comments submitted by Save the Scenic Santa Ritas, et al. regarding the DEIS (Save the Scenic Santa Ritas is a Coalition member group).** These comments are a collaborative and impressive community effort that thoroughly analyzed the DEIS in its entirety. We are proud to be a signatory to these comments and believe they present an extremely important critical evaluation of the potential environmental impacts from the Rosemont Copper Project presented in the DEIS. We emphasize the comments' contention that the Coronado National Forest should prepare a revised or supplemental DEIS due to the inadequate and incomplete information and analysis presented in the DEIS. We also support the detailed comments submitted by Coalition member group Sky Island Alliance, including those comments that address deficiencies in the DEIS as related to endangered, threatened, sensitive, and priority vulnerable species.

Outlined below are a few additional comments submitted by the Coalition. These comments focus on our core mission of protecting Pima County's rich biological

resources through comprehensive land-use planning, and specifically an analysis of possible conflicts between the proposed action and the Pima County Comprehensive Land Use Plan, a topic sorely lacking in details in the DEIS. We also provide brief comments on the potential socioeconomic impacts from the Rosemont Copper Project as presented in the DEIS.

### **Sonoran Desert Conservation Plan**

Pima County's Sonoran Desert Conservation Plan (SDCP) is a ground-breaking effort to conserve the most ecologically valuable lands and resources across the region, while guiding growth into more appropriate areas. The SDCP addresses several elements of resource conservation, including cultural preservation, open space conservation, protection of mountain parks and natural reserves, and ranch conservation, and ecological conservation.

The biological goal of the SDCP is "to ensure the long-term survival of the full spectrum of plants and animals that are indigenous to Pima County through maintaining or improving the ecosystem structures and functions necessary for their survival." While the DEIS does acknowledge the SDCP, the only component of the SDCP evaluated in the DEIS are impacts to "priority vulnerable species." The SDCP, however, is a comprehensive regional conservation plan with multiple components. One key component that deserves further evaluation in the DEIS is the Maeveen Marie Behan Conservation Lands System (CLS).

### ***Conservation Lands System***

On page 385, the DEIS states, "The Conservation Land [sic] System within the Sonoran Desert Conservation Plan categorizes and identifies locations of priority biological resources within Pima County and provides policy guidelines for the conservation of these resources." This is the only mention of the CLS in the DEIS. We contend that without further evaluation of the CLS and other components of the SDCP such as Pima County's proposed Multi-Species Conservation Plan, the DEIS does not satisfy the federal mandate that a DEIS "shall include discussions of possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned" (40 C.F.R. § 1502.16(c)). Furthermore, the DEIS does not align with 40 C.F.R. § 1506.2(d) which states, "To better integrate environmental impact statements into State or local planning processes, statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law."

The CLS was constructed with participation and oversight by the SDCP Science Technical Advisory Team and according to the most current tenets of conservation biology and biological reserve design. The CLS emphasizes retaining areas that contain large populations of priority vulnerable species; providing for the adjacency and proximity of habitat blocks; preserving the contiguity of habitat at the landscape level; and retaining the connectivity of reserves with functional corridors. Through the application of these tenets, the CLS retains the diverse representation of physical and environmental conditions, preserves an intact functional

ecosystem, minimizes the expansion of exotic or invasive species, maximizes the extent of roadless areas, and minimizes fragmentation.

The CLS consists of a map identifying the categories of environmentally-sensitive lands developed by the Science Technical Advisory Team, as well as an associated set of development guidelines and open space set-asides that have been integrated into the County's planning as zoning regulations and are required for development projects that are subject to a rezoning or other discretionary action. The CLS is part of the Environmental Element of Pima County's Comprehensive Land Use Plan's Regional Plan Policies.

Unfortunately, as stated above, the DEIS does not quantify nor even qualify impacts to the CLS, a crucial component of the larger SDCP. The proposed Rosemont Mine poses significant threats to the CLS and all the other elements encompassed by the SDCP. Specifically, the project site is: 1) adjacent to a critical biological core area and situated within key biological corridors; 2) situated in the headwaters of Davidson Creek, which is identified for riparian restoration and rehabilitation and is also in the vicinity of identified important springs; 3) located within a strategic corridor of lands linking the Santa Rita and Rincon Mountains and proximate to a proposed new Mountain Park and a new Natural Preserve; 4) situated within an area designated as an archeological sensitivity zone, as well as a Priority Archeological Complex and a Priority Archeological Site and 5) situated proximate to four ranches purchased with open space bonds, a Ranch Conservation District immediately adjacent to Coronado National Forest lands, and virtually surrounded by ranchlands identified as important to and/or targets for conservation.

The Rosemont Project will directly impact 3,786.3 acres of lands in the CLS, including 510.9 acres of Important Riparian Areas, 302.8 acres of Biological Core Areas, and 2,972.6 acres of Multiple Use Management Areas. Indirect impacts of the project exist on over 145,000 acres of CLS lands, the majority of which are Biological Core Areas, along with significant amounts of Important Riparian Areas.

Important Riparian Areas constitute the most biologically sensitive of CLS lands. They are "critical elements of the Sonoran Desert where biological diversity is at its highest... [They] are valued for their higher water availability, vegetation density, and biological productivity. They are also the backbone to preserving landscape connectivity." Pima County guidelines recommend a landscape conservation objective of 95% undisturbed natural open space for Important Riparian Areas, 510.9 acres of which would be impacted by the proposed Rosemont Copper Project.

Biological Core Management Areas are "those areas that have high biological values. They support large populations of priority vulnerable species, connect large blocks of contiguous habitat and biological reserves, and support high value potential for five or more priority vulnerable wildlife species." Pima County guidelines recommend a landscape conservation objective of 80% undisturbed natural open space for Biological Core Management Areas, 302.8 acres of which would be impacted by the proposed Rosemont Copper Project.

Multiple Use Management Areas are “those areas where biological value are significant...[and] support populations of vulnerable species, connect large blocks of contiguous habitat and biological reserves, and support high value potential habitat for three or more priority vulnerable species.” Pima County guidelines recommend a landscape conservation objective of 66 2/3% undisturbed natural open space for Multiple Use Management Areas, 2,972.6 acres of which would be impacted by the proposed Rosemont Copper Project.

Finally, Critical Landscape Connections are another important component of the CLS. They are “broadly defined areas that provide connectivity for movement of native biological resources but which also contain potential or existing barriers that tend to isolate major conservation areas.” One of the Critical Landscape Connections is “across the I-10 corridor along Cienega Creek in the east,” an area just downstream of the project site.

More detailed conservation guidelines and the CLS map can be found in Pima County’s Comprehensive Land Use Plan and proposed Multi-Species Habitat Conservation Plan permit documents. Before a Final EIS and Record of Decision is issued, the U.S. Forest Service needs to thoroughly analyze possibly conflicts between the proposed action and this local land use plan, as required in 40 C.F.R. § 1502.16(c) and 40 C.F.R. § 1506.2(d).

### **Socioeconomic impacts**

Page 699 of the DEIS states that “The economic effects of the proposed project, both beneficial and adverse, have been the subject of several reports produced at different times by different parties for different purposes.” Three reports are cited below this quote and are indicated to represent the majority of the economic analysis considered with regard to the impacts of the proposed project. This analysis is severely limited and categorically fails to consider the full suite of economic considerations required.

In consideration of actions expected to have significant environmental effects, federal agencies must address “the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity” (42 U.S.C. § 4332(2)(C)(iv)). In 1997, it was estimated that the economic value of global ecosystem services and natural capital exceeded \$33 trillion per year<sup>1</sup>. Ecosystem valuation places economic value on services such as nutrient cycling, soil formation, and pollination, services that the economic market typically fails to quantify. To fulfill the statutory requirement to address the “maintenance and enhancement of long-term productivity,” the Forest Service should provide a full ecosystem valuation for the landscape proposed to be impacted by the project. Putting all of the impacts into *economic* terms would result in a more complete analysis of the proposed Rosemont Copper Project.

Numerous tools exist for ecosystem valuation. The Forest Service should examine the feasibility of using the InVEST (Integrated Valuation of Environmental Services and Tradeoffs) modeling

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<sup>1</sup> Constanza, R. et al. The value of the world’s ecosystem services and natural capital. *Nature* **387**, 253-260 (1997).

suite developed by the Natural Capital Project to support environmental decision-making. InVEST is a family of tools to map and value the goods and services from nature which are essential for sustaining and fulfilling human life. It is a readily available and free tool.<sup>2</sup> In another NEPA document, the Final Environmental Impact Statement for the Elwha River Ecosystem Restoration, “contingent valuation” is identified as:

[A] standardized and widely used method for estimating the willingness of citizens to pay for recreation and for restoring or preserving natural attributes. It is recommended for use by federal agencies performing benefit-cost analysis and for valuing natural resource damages, and has been upheld as valid by federal courts.

Other methods and tools exist for ecosystem valuation. In general, the DEIS lacks a full examination of the true economic impact of this proposed project. A more complete economic analysis is necessary in either a revised or supplemental DEIS.

In summary, we appreciate the opportunity to provide comments on the Draft Environmental Impact Statement for the Rosemont Copper Project. We assert that a revised DEIS or a supplemental DEIS is warranted for this project given the many deficiencies found in the DEIS and to fully comply with the requirement of the National Environmental Policy Act.

If you have any questions regarding our comments, please do not hesitate to contact me.

Sincerely,



Carolyn Campbell  
Executive Director

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<sup>2</sup> <http://www.naturalcapitalproject.org/InVEST.html>