



## United States Department of the Interior

NATIONAL PARK SERVICE  
INTERMOUNTAIN REGION  
12795 West Alameda Parkway  
P.O. Box 25287  
Denver, Colorado 80225-0287



IN REPLY REFER TO:

August 15, 2013

Mindy Vogel  
Coronado National Forest-Minerals and Geology Program Lead  
Rosemont Copper Project Manager  
300 W Congress St #5  
Tucson, AZ 85701

Dear Ms. Vogel,

Saguaro National Park appreciates the opportunity to participate as a Cooperating Agency in the Coronado National Forest Rosemont Copper Project. This letter serves to document our comments on the Preliminary Administrative Final EIS for the project. The park has a number of concerns relating to impacts of the proposed mine, including air quality and visibility, scenic viewsheds, and revegetation of disturbed areas within the project area. Each of these is discussed in summary below.

The Air Resources Division (ARD) of the National Park Service conducted a thorough analysis of potential impacts to the Air Quality Related Values (AQRV's) of the park to which the proposed mine operations would pose a threat. Their findings are that air quality would be measurably degraded at both the east and west districts of the park, both of which are designated Class I airsheds. Specifically, visibility would be further impaired, impacting the experience of more than 650,000 visitors who come to the park and spend approximately \$22m annually in the Tucson area. Nitrogen deposition from the mine operation would exceed the ecological critical load threshold, potentially leading to even further alterations of the vegetation communities that the park was established to protect. The NPS Air Resources Division is the service-wide subject matter experts for air quality in National Parks, and as such, we support their findings and request that their prepared statements be included in the EIS prior to distributing it to the public.

Scenic viewsheds are one of the many resource-related values that visitors to a National Park appreciate and value as an important part of their visit. The proposed open pit mine and associated tailings will be visible from some trails and scenic viewpoints from areas in the park such as the popular Tanque Verde Ridge Trail. Compounded with the visibility impairment mentioned above, the overall scenic values that visitors expect will be compromised.

We have additional concerns involving the planned revegetation of disturbed areas within the project footprint including the mine tailings. Successfully reclaiming disturbed soils and bare mineral soils in the arid desert southwest is very challenging and has historically been met with limited success. The information in the FEIS has not adequately demonstrated that stated reclamation efforts will be successful in reestablishing a native plant community on the affected lands. At best, reclamation efforts will lead to a minimal percentage of the native plant communities that currently exist on the site. Assurances need to be made that the funding to conduct and monitor the revegetation will continue over time at adequate levels. A secondary concern to the success of revegetating the site is the eminent spread of non-native invasive plant species such as buffelgrass that threaten the ecological integrity of the Sonoran desert. The spread of

invasive plants is a regional concern and can negatively impact adjacent and lands near the project area. The park and other public land management agencies in this region have spent considerable effort and funds to control the spread and negative effects of non-native invasive plants. Ensuring that this problem is not exasperated by the proposed project and demonstrating that the reclamation efforts will be successful is important to these long-term efforts.

Thank you again for the opportunity to provide comments. If you should have any questions please contact Superintendent Darla Sidles at (520) 733-5101.

Sincerely,

/s/ John Wessels  
Regional Director, Intermountain Region

authenticated by:  
Sharon Swihart, 8/15/2013

CC: Darla Sidles, Superintendent, Saguaro National Park  
Laura Joss, Deputy Regional Director, Intermountain Region  
Tammy Whittington, Associate Regional Director, Intermountain Region  
Michael George, Environmental Protection Specialist, Air Resources Division, National Park Service  
Laurie Domler, Acting Regional Environmental Coordinator, Intermountain Region