

## DOCUMENT REVIEW COMMENT FORM—(TOWN OF SAHUARITA)

Commenter	Chapter	Section	Page	Line	Comment/Change requested
Town of Sahuarita	2	Alternatives, Including the Proposed Action	95	N/A	Table 12 notes, “Minor changes in gradient or groundwater levels as a result of mine supply pumping would occur in the vicinity of the Sierrita sulfate plume. Overall direction of flow, location of plume, and effectiveness of control are not expected to be affected.” The Town understands that the Freeport McMoRan modeling for the mitigation order includes pumping from the Rosemont wells. Text in this section should be updated to reflect the groundwater modeling validation and updates being completed by Freeport McMoRan.
Town of Sahuarita	3	Groundwater Quantity	34	16-17	<b>Previous Comment:</b> The Preliminary Administrative FEIS incorrectly notes, “Artificial recharge is attributable to ... and Sahuarita Wastewater Treatment Plant (permit pending).” The Sahuarita Wastewater Treatment Plant is an existing permitted facility. It is permitted to treat up to 1.5 MGD under Aquifer Protection Permit No. P-103602. ADWR has completed the first substantive review of a significant amendment to that permit to increase the capacity to 3.0 MGD. The facility also has an existing Underground Storage Facility Permit and an existing Water Storage Permit for 896 acre-feet per annum (USF Permit No. 71-595209.0000 and WSF Permit No. 73-595209.0000, respectively). Please update the text and confirm the proposed activities do not adversely impact the Town’s facility.
Town of Sahuarita	3	Groundwater Quantity	69	41	Please update this section to include protection of Town of Sahuarita wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.
Town of Sahuarita	3	Groundwater Quantity	70	3	Please update this section to include Rosemont’s commitment to recharge, with Central Arizona Project water and within the drawdown area, a minimum of 105% of the amount of water withdrawn from the Rosemont wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.
Town of Sahuarita	3	Groundwater Quantity	70	43	Please update these sections to include Rosemont’s commitment to recharge, with Central Arizona Project water and within the drawdown area, a minimum of 105% of the amount of water withdrawn from the Rosemont wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.
Town of Sahuarita	3	Groundwater Quantity	71	1-8	Please update these sections to include Rosemont’s commitment to recharge, with Central Arizona Project water and within the drawdown area, a minimum of 105% of the amount of water withdrawn from the Rosemont wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.
Town of Sahuarita	3	Groundwater Quantity	71	15-17	Please update this section to include protection of Town of Sahuarita wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.
Town of Sahuarita	3	Groundwater Quantity	71	26-31	Please update these sections to include Rosemont’s commitment to recharge, with Central Arizona Project water and within the drawdown area, a minimum of 105% of the amount of water withdrawn from the Rosemont wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.

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Town of Sahuarita	3	Groundwater Quality and Geochemistry	8	2	Table 68 notes, "Minor changes in gradient or groundwater levels as a result of mine supply pumping would occur in the vicinity of the Sierrita sulfate plume. Overall direction of flow, location of plume, and effectiveness of control are not expected to be affected." (Ch 3, p 8). Further, the Preliminary Administrative FEIS notes, "The approximate 15 percent increase in gradient resulting from the Rosemont Copper Mine water supply pumping could cause a change in the rate of movement of the Sierrita sulfate plume, but the overall direction of groundwater flow, location of the plume, and ability to control the plume are unlikely to be substantially affected." (Ch 3 Groundwater Quality, p 29). Text in this section should be updated to reflect the groundwater modeling validation and updates being completed by Freeport McMoRan.
Town of Sahuarita	3	Groundwater Quality and Geochemistry	29	24	The Town understands that the Freeport McMoRan modeling for the mitigation order includes pumping from the Rosemont wells. Text in this section should be updated to reflect the groundwater modeling validation and updates being completed by Freeport McMoRan.
Town of Sahuarita	3	Transportation/ Access	1	40-41	"The potentially feasible analyzed copper concentrate and cathode delivery routes include the following:"  The Town of Sahuarita would like to have confirmation and a notation in the FEIS that mine deliveries would not use Sahuarita Road on regular basis.
Town of Sahuarita	3	Socioeconomic s and Environmental Justice	54	15-20	The Preliminary Administrative FEIS, "There is also the potential that the proposed mine might affect nearby groundwater wells that supply water to properties in the area...If the proposed mine were to result in the loss of water supply to some of the properties that were not mitigated through participation in one of the Well Owners Agreements, they would likely suffer additional decreases in value that could be greater than the effects described in the preceding analysis." (Ch 3 Socioeconomics, p. 54).  The Preliminary Administrative FEIS further notes, "The long-term operation of the copper mine has the potential to impact ... wells in Sahuarita. Groundwater drawdowns are likely in these areas, and water availability could be impacted....If impacted, there would likely be an increase in domestic and agricultural water pumping costs, although effects may be mitigated if the well owner enrolled in the well owner protection program implemented by Rosemont Copper." (Ch 3 Socioeconomics, p. 62).  Please update this section to include protection of Town of Sahuarita wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.

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Town of Sahuarita	3	Socioeconomic s and Environmental Justice	62	8-15	<p>The Preliminary Administrative FEIS, “There is also the potential that the proposed mine might affect nearby groundwater wells that supply water to properties in the area...If the proposed mine were to result in the loss of water supply to some of the properties that were not mitigated through participation in one of the Well Owners Agreements, they would likely suffer additional decreases in value that could be greater than the effects described in the preceding analysis.” (Ch 3 Socioeconomics, p. 54).</p> <p>The Preliminary Administrative FEIS further notes, “The long-term operation of the copper mine has the potential to impact ... wells in Sahuarita. Groundwater drawdowns are likely in these areas, and water availability could be impacted....If impacted, there would likely be an increase in domestic and agricultural water pumping costs, although effects may be mitigated if the well owner enrolled in the well owner protection program implemented by Rosemont Copper.” (Ch 3 Socioeconomics, p. 62).</p> <p>Please update this section to include protection of Town of Sahuarita wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.</p>
Town of Sahuarita	Appendix B	Mitigation and Monitoring Plan	addition requested	N/A	<p>The Preliminary Administrative FEIS notes, “Dust control mitigation measures would be used on access, haul, service, and maintenance roads during the construction, operation, and closure of the mine.” (Ch 3 Air Quality, p. 66). Appendix B addresses dust control for unpaved roads, but that discussion does not include the utility maintenance road (Appendix B, OA-AQ-02). Appendix B also includes “Weekly inspections during construction of power supply line and water supply pipeline to ensure location complies with Arizona Corporation Commission Certificate of Environmental Compatibility and final MPO.” (Appendix B, OA-SR-01). This section is also absent any discussion of ongoing mitigation and monitoring of fugitive dust from the utility corridor.</p> <p>Please update Appendix B to include a mitigation measure to monitor and mitigate fugitive dust along the utility corridor that is in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.</p>
Town of Sahuarita	Appendix B	Mitigation and Monitoring Plan	addition requested	32	Please update Appendix B to reference the License Agreement between Rosemont Copper and the Town of Sahuarita (contract number CO13-0009).
Town of Sahuarita	Appendix B	Mitigation and Monitoring Plan	70	Responsible Party	OA-GW-07 – Please update this section to include reporting to the Town of Sahuarita in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.
Town of Sahuarita	Appendix B	Mitigation and Monitoring Plan	73	N/A	Please update this section to include protection of Town of Sahuarita wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.

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Town of Sahuarita	Appendix B	Mitigation and Monitoring Plan	74	N/A	Please update this section to include Rosemont's commitment to recharge, with Central Arizona Project water and within the drawdown area, a minimum of 105% of the amount of water withdrawn from the Rosemont wells in accordance with the License Agreement between Rosemont Copper and the Town of Sahuarita.

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