

DOCUMENT REVIEW COMMENT FORM—(US ARMY CORPS OF ENGINEERS)

Commenter	Chapter	Section	Page	Line	Comment/Change requested
Blaine	3	Surf Water Quan	6	20	Table 76: This table is misleading because it is not being revealed that the reduction in stormwater flows during mine operations for the Barrel Alternative is much higher than 17%.
Blaine	3	Surf Water Quan	30	19	Table 90: Same comments as above. The Corps' concern is that a reduction in flow of close to 40% during mining will impact downstream areas to such a degree that the 17% reduction in flow postclosure won't matter.
Blaine	3	Surf Water Quan	33	16/17	Table 92: Same as above.
Blaine	3	Surf Water Quan	37	1-32	Very weak discussion on Cumulative Effects.
Blaine	3	Surf Water Quan	39	41-44	This statement is incorrect. The Corps requests the USFS remove the portion of the statement " to compensate for impacts to WUS ". These parcels are currently not in our mitigation plan and the DC and BC parcels will not be included. We have not yet determined if Mulberry Canyon will be included or not so we urge the USFS to remove the reference to it.
Blaine	3	Surf Water Quan	40	14-22	Please remove this entire section on SCR. At this time, there is no commitment by any ILF Sponsor to accept SCR.
Blaine	3	Surf Water Quan	42	17-23	Please remove this entire paragraph as it is incorrect. Not only will the Corps not be accepting the DC/BC parcels but there has been no scientific determination that acquisition and protection of these parcels or SCR would "effectively mitigate impacts to surface waters".

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Blaine	3	Surf Water Quan	42	26-28	Please remove this statement: “While it is outside the analysis 26 area for surface waters, discharge of water below Pantano Dam would also be effective at creating or maintaining surface waters in the region.” There is no scientific documentation that this statement is correct. In fact, there is an hydrologic sink below Pantano Dam which could result in substantial infiltration of surface waters passed over the dam.
Blaine	3	Surf Water Qual	3	11-12	We, again, request you remove the statement regarding “experts in the field” since you did not identify them. If you referenced reports, etc, in the appropriate sections, then the “experts” will be apparent.
Blaine	3	Surf Water Qual	3	6-7	We, again, request you remove “to assess direct impacts to surface water quality”. It is acceptable to state “to assess direct impacts to potentially jurisdictional waters of the U.S.” A PJD is to be used for purposes of Section 404/401. The EIS should not only be addressing impacts to surface water quality (401) but also quantity (404).
Blaine	3	Surf Water Qual	5	Issue 3:E:4	Table 97: the acres of WUS impacted has changed with the latest modeling. For example, acres of WUS impacted by the Barrel Alternative is now ~ 68.
Blaine	3	Surf Water Qual	19	1,2	Table 103: Please contact WL for revised numbers on WUS affected. There have been very recent changes.
Blaine	3	Surf Water Qua	34	4-12	As stated in Surface Water Quantity Section, the Cumulative Effects section is extremely weak.
Blaine	3	Surf Water Qual	34	35-41	This statement is incorrect. The Corps requests the USFS remove the portion of the statement “ to compensate for impacts to WUS ”. These parcels are currently not in our mitigation plan and the DC and BC parcels will not be included. We have not yet determined if Mulberry Canyon will be included or not so we urge the USFS to remove the reference to it.

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Blaine	3	Surf Water Qual	37	42-44	Please remove these statements as the DC Parcels will not be part of the Section 404 mitigation and there is no scientific documentation that preservation of these parcels would “effectively mitigate impacts to surface water quality”. Please note: there is no discussion at all on mitigation of impacts to WUS.
Blaine	3	Seeps, Springs, Rip	10 11	35-41 1-3	The Corps is concerned that this discussion on wetlands may lead the public to assume that all wetlands are jurisdictional under Section 404. We would suggest some clarification that potentially jurisdictional wetlands under Section 404 must meet specific criteria in regard to hydrology, hydrophytic vegetation, and hydric soils.
Blaine	3	Seeps, Springs, Rip	33	37	“near term” in this section is defined as “up to 50 years after mine closure”. However, in lines 24/25 page 15 it states” Near-term impacts are defined as those occurring during the active mine life and up to 50 years after 24 final reclamation and closure.” These are very different; please be consistent.
Blaine	3	Seeps, Springs, Rip	34	40	Same comment as above
Blaine	3	Seeps, Springs, Rip	43	31,32	Please reword this; there is no need for the Corps to issue a Section 404 permit. The applicant, Rosemont Copper, needs to obtain a Section 404 permit to conduct mining; therefore, a Section 401 WQC is required.
Blaine	3	Seeps, Springs, Rip	54 55	3-43 1-23	Weak discussion on cumulative effects. It identifies them but does not really get into enough detail on the effects and how they relate to RM.
Blaine	3	Seeps, Springs, Rip	56	41-43	This statement is incorrect. The Corps requests the USFS remove the portion of the statement “ to compensate for impacts to WUS ”. These parcels are currently not in our mitigation plan and the DC and BC parcels will not be included. We have not yet determined if Mulberry Canyon will be included or not so we urge the USFS to remove the reference to it.

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Blaine	3	Seeps, Springs, Rip	57	15-23	Please remove this entire section on SCR. At this time, there is no commitment by any ILF Sponsor to accept SCR.
Blaine	3	Seeps, Springs, Rip	58	8-20	There is no scientific documentation that any of these actions will effectively mitigate the impacts.
Blaine	3	Seeps, Springs, Rip		18-20 23-24	There are no studies which document this statement: “The new riparian habitat that would be created downstream of Pantano Dam would replace hydroriparian habitat if any is lost, although these lands are located just outside the analysis area.” In fact, preliminary investigations by PC RFCD indicate a hydrologic sink below Pantano Dam. The likelihood of development of hydroriparian habitat below Pantano Dam is extremely speculative due to geomorphology. A very speculative statement which should be removed.
Blaine	Appendix G	Comments			The Corps’ comments to the DEIS have not been included or addressed in Appendix G. The Corps requests our comments be included and be addressed.