

Rosemont Copper Mine

Objection Review

Objection # (s): 0084-SSSR

Resource Area(s): Invasive Species – General (INV-1)

Objection Issue:

- 0084-10: The agency fails to provide a plan for invasive species management that shows impacts will be adequately mitigated. The FEIS provides conflicting information regarding the frequency of monitoring. It states, "Disturbed and revegetated areas would be surveyed for invasive species twice a year following winter and summer rains ... " (FEIS Appendix B at B-12). But later it states, "Commencing in the first year copper is produced, annual monitoring of disturbed areas within perimeter fence would be conducted to determine occurrence of invasive plant species ..." (FEIS Appendix B at B-38). These types inconsistencies highlight the gross inadequacies of this plan.

Remedy Supplied by Objector (if any):

0084-10: Develop a robust mitigation, monitoring, and management plan for invasive plants and non-native aquatic species. Both invasive plant and NNAS monitoring must take place in the entire analysis area and include potential travel corridors for all goods and services originating from or ending up at the mine site.

Law, Regulation and/or Policy: FSM 2900, ACC R3-4-244 and 245

Review Team Member Response:

In regard to the objection issue that the agency fails to provide a plan for invasive species management showing impacts will be adequately mitigated, key project record documents related to this issue that show adequate consideration and mitigation include: (1) Preliminary Invasive Species Management Plan [PR 017342], (2) Environmental Assessment for the Invasive Exotic Plant Management Program [PR 016734] (3) Revegetation Performance Measures [PR 046858]; and (4) Rosemont Reference and Reclaimed Area Sampling Protocol [PR 046857].

The objector contends that the mitigation and monitoring plan provides conflicting information regarding the frequency of monitoring. The first statement quoted above is from mitigation FS-SR-02: Revegetate disturbed areas with native species [PR 047511_6, Appendix B, p. B-12]. The mitigation includes efforts to establish native grasses, forbs, shrubs, and trees on areas disturbed by mining and mine related activities. The complete quoted statement is "Disturbed and revegetated areas would be surveyed for invasive species twice a year following winter and summer rains; and such locations would be mapped and actions taken to prevent, eliminate, or control invasive plants should they occur, in accordance with the final MPO." This describes the

effectiveness monitoring that would be required and is in accordance with standard weed management practices.

The second quoted statement is from mitigation FS-BR-11: Monitoring and control of actions to reduce or prevent impacts to Chiricahua leopard frog from invasive aquatic species [PR 047511_6, Appendix B, p. B-38]. The mitigation includes specific actions to monitor, identify, and remove invasive species (including American bullfrog, northern crayfish, tiger salamanders, and warm-water, spiny rayed fish species) that could impact the Chiricahua leopard frog. The complete quoted statement is "Commencing in the first year copper is produced, annual monitoring of disturbed areas within perimeter fence would be conducted to determine occurrence of invasive plant species and implement best management practices to prevent introduction and spread." This describes a portion of the implementation monitoring that would be required.

The two mitigation measures are unrelated so it can be expected that the frequency of monitoring would not be the same. The mitigation and monitoring plan does not provide conflicting information regarding the frequency of monitoring.

Recommended Remedy by Review Team Member (if any): The remedy suggested by the objector is not warranted. No remedy is required.

Review Team Member: Allen White, Forest Health