



---

# MEMORANDUM

---

Date: October 7, 2021

To: The Honorable Chair and Members  
Pima County Board of Supervisors

From: C.H. Huckelberry  
County Administrator

A handwritten signature in black ink, appearing to read "CHH", is written over the printed name "C.H. Huckelberry".

Re: **Comments to the State Mine Inspector Regarding the Proposed Copper World Mining on the East Flank of the Santa Rita Mountains**

Please see the attached comments we provided to the State Mine Inspector requesting public review and input regarding the proposal by Hudbay for potentially three open pit mines in the Santa Rita Mountains.

The County has specific interest in mitigating anticipated adverse impacts from the proposed mining operation and requests a more open and transparent review and comment process.

In addition, eight specific concerns are noted in the attached letter to the State Mine Inspector.

CHH/anc

Attachment

c: Jan Leshar, Chief Deputy County Administrator  
Carmine DeBonis, Jr., Deputy County Administrator for Public Works  
Francisco García, MD, MPH, Deputy County Administrator & Chief Medical Officer,  
Health and Community Services  
Linda Mayro, Director, Office of Sustainability and Conservation



## COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER  
115 N. CHURCH AVE., 2<sup>nd</sup> FLOOR, Suite 231, TUCSON, AZ 85701-1317  
520-724-8661, FAX 520-724-8171

C.H. HUCKELBERRY  
County Administrator

October 7, 2021

Joe Hart, Arizona State Mine Inspector  
Reclamation Department  
Arizona State Mine Inspector's Office  
1700 W. Washington St., Suite 403  
Phoenix, AZ 85007

Sent by Facsimile: (602) 542-5335

**Re: Reclamation Plan Summary-Rosemont's Copper World Project; Request for Public Meeting**

Dear Mr. Hart:

In accordance with ARS § 27-929.B.2, Pima County requests a virtual public meeting to provide the affected public with accurate information about the above-mentioned project and the process by which a reclamation plan permit is issued. Such a meeting would help address some of the inevitable concerns that arise with any government action or approval process.

During the process, any person who may be adversely affected by the plan may file written comments on the plan or request a public meeting. Pima County is an affected party both on behalf of the citizens as well as being the entity that provides access to the Santa Rita piedmont and mountains, and specifically, the Helvetia mining district.

Reclamation is important to residents of Pima County, some of whom have been adversely affected by lack of sufficient reclamation on earlier mines. Pima County has given much copper to the nations of this world. While the majority of the mine disposal areas are on private lands, it would be highly visible and close to residents in unincorporated Pima County. There has always been intense interest in resolving mining impacts through avoidance, minimization, and mitigation in our community.

Specifically, we have the following questions and concerns that should be addressed at the public meeting:

1. The State Mine Inspector's Office has moved the project to the public notification process. Does this mean that the submittal was technically complete and met the approval criteria?

Joe Hart, Arizona State Mine Inspector

Re: **Reclamation Plan Summary-Rosemont's Copper World Project; Request for Public Meeting**

October 7, 2021

Page 2

2. Premature approval of the reclamation plan. As the extent and configuration of the mine itself is merely a concept at this time, Pima County is concerned that approval of this reclamation plan is premature. Hudbay is planning additional exploration and has had no opportunity to optimize the configuration around potentially exploitable resources on private and federal lands. The Rosemont reclamation plan, for example, was submitted in 2009 and later had to be substantially revised based on the outcome of the various studies and engineering designs that were developed, including deletion of the heap leach operation. Should the mine's facilities extend onto the Bureau of Land Management land, the state and federal reclamation plans must work together.
3. Impacts to biological resources, including impacts to Pima County's Maeveen Marie Behan Conservation Lands System (CLS). The mine's reclamation plan must repair any damage done to the CLS, which was adopted as part of Pima County's Comprehensive Plan. Biological Core Management Areas like these are second only to Important Riparian Areas in their biological diversity. They support populations of rare and vulnerable species and provide landscape continuity between protected reserves. In developing the CLS, Pima County worked with state resource management agencies, federal land managing agencies, Tohono O'odham Nation, developers, ranchers, scientists, outdoor recreation enthusiasts, environmentalists, and the University of Arizona to balance the needs of future growth with protection of the resource values that make Pima County a great place to live. Reclamation should restore all wildlife habitat values in these areas.
4. Value of the Santa Rita Experimental Range as a scientific research and recreation area. The main access route for the mine construction, operation and maintenance would be the Santa Rita Road. The proposed 138kV line, waterline and utility maintenance roads bisect the Santa Rita Experimental Range, which is an important recreational area as well as being an area of scientific investigation. The road will be used for hauling reagents and concentrates; rectification of damages due to spills would also be needed. The disposition of infrastructure and land at the end of mining is unclear.
5. Impacts to water. No backfilling is proposed. If pit lakes form, this could contribute to water shortages for down-gradient private well use and in a watershed that supplies shallow groundwater and surface water to maintain springs nearby. Backfilling should be considered as a best management reclamation practice, and in light of the number of pits and potential future prospects identified by Hudbay's investor materials backfilling might also minimize future transportation and disposal costs.
6. Dust control and windblown emissions of dust. Pima County Code (PCC) Title 17, Chapter 16, Article II, requires that the site not be left in a manner that allows windblown dust to cause a violation of the visibility limiting standard in PCC 17.16.050. The entire site (any disturbed areas, haul roads, access roads, storage piles, and tailings) must be treated to control fugitive dust emissions by using gravel, vegetation, and/or equivalent controls.

Joe Hart, Arizona State Mine Inspector

Re: **Reclamation Plan Summary-Rosemont's Copper World Project; Request for Public Meeting**

October 7, 2021

Page 3

7. Impacts to cultural and archaeological resources. Ce:wi Duag (Long Mountain) and the uplands on either side of the ridgeline of the Santa Rita Mountains are a traditional cultural property of the Tohono O'odham. It is a landscape imbued with cultural significance (sacred sites, ancestral villages and ancestral remains) and is a source of plant, animal, and mineral resources used to maintain the traditional O'odham culture for over 7,000 years. The United States Forest Service, in consultation with the Arizona State Historic Preservation Office, determined Ce:wi Duag to be eligible for listing on the National Register of Historic Places in 2011. Numerous other Tribal communities have affirmed ties to this deeply storied landscape included the Hopi Nation, Pascua Yaqui Tribe, Pueblo of Zuni, White Mountain Apache Tribe, and the Yavapai Apache Nation. Given the overwhelming cultural ties, the proposed project has certain potential to impact significant cultural sites containing the remains of generations of native peoples that would require compliance with the Arizona Antiquities Act (ARS § 41-865).
  
8. Scenic and safety impacts. The Santa Rita Road, which Pima County has designated as a Scenic Route would be the main access road for mine construction and reclamation. Although high voltage transmission lines are statutorily exempt from County regulation, Pima County does have concerns regarding impacts to the scenic values in the Santa Rita Experimental Range and Santa Rita Mountains.

In conclusion, we request and strongly advise a virtual public meeting where these and other concerns raised by the affected public can be addressed. Approval of a state reclamation plan without a public meeting is not in the public interest of the residents of Pima County.

Sincerely,



C.H. Huckelberry  
County Administrator

cc: Carmine DeBonis, Deputy County Administrator-Public Works  
Linda Mayro, Director, Office of Sustainability & Conservation  
Ursula Nelson, Director, Pima County Dept. of Environmental Quality  
Suzanne Shields, Director, Regional Flood Control District  
Ana Olivares, Director, Transportation Dept.