



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
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(520) 740-8661 FAX (520) 740-8171

C.H. HUCKELBERRY
County Administrator

December 23, 2009

Jeanine Derby, Forest Supervisor
Coronado National
300 W. Congress Street
Tucson, Arizona 85701

Re: **Compensatory Mitigation Lands**

Dear Ms. Derby:

The County continues to be concerned over the adverse impacts associated with the proposed Rosemont mine. The measures proposed by Rosemont in their mining Plan of Operations are clearly inadequate to offset these adverse environmental impacts. Should the mine proceed, we request that the Forest Service uphold mitigation guidelines intended to assist the region in building an interconnected biological reserve system that crosscuts various jurisdictions. The mitigation guidelines and biological reserve design are embodied in the Maeveen Marie Behan (MMB) Conservation Lands System, a key outcome of the Sonoran Desert Conservation Plan (SDCP). The US Department of Agriculture Coronado National Forest was a participating agency in the SDCP development.

In previous correspondence with Rosemont, and then later with your agency, I have repeatedly outlined five environmental performance standards, one of which is tied to the MMB Conservation Lands System mitigation ratios. Based on Rosemont's initial Plan of Operations, we have estimated compensatory mitigation at approximately 8,800 acres. Since then, we have learned of other project components that lie outside the mine footprint *per se*. The Forest Service should demand mitigation for lands directly affected by all mine-related facilities, including utilities and other offsite land disturbances.

Attachment 1 to this letter outlines general mitigation principles that we would expect for the compensation of public land. In general, mitigation should be applied only after all efforts to avoid and minimize are applied. The Forest Service needs to ensure that mitigation will occur prior to impacting Forest Service lands. This assures compensation actually takes place, regardless of whether the project fails and funding, promises, and contracts fall apart. Mitigation lands must be closed to new mineral and substantially free of mining claims. Any land acquisition must include related water rights or claims that currently exist. We also assume that mitigation lands would be managed, monitored and protected in perpetuity.

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Another performance standard is to ensure there is no impact to the water resources of the Cienega Basin. Rosemont's own groundwater model shows that the project would greatly reduce underflows of groundwater to Davidson Canyon and many springs in the area during the 122-year period they analyzed. Our model shows impacts to upper Cienega Basin that would expand and endure over thousands of years. We continue to oppose a mine that would jeopardize the long-term water resources of the upper and lower Cienega Basin, in which federal and local governments have invested millions of dollars.

If the Forest Service permits a mine that would impact aquatic resources of Cienega Creek, **there will be no suitable replacement habitat.** Notwithstanding our opposition to irreversible and irretrievable loss of water and aquatic habitat and our belief that these impacts cannot be mitigated, we suggest in the attachment certain additional principles to govern selection of mitigation for aquatic resources, separate from upland and riparian resources.

Per your request, we have identified a number of properties that may address the needs for compensatory mitigation of upland and riparian habitat. Each property is identified via its parcel tax code (Attachment 2) and in color (brown, purple, blue, and gray) on the Rosemont Mitigation Parcels map (Attachment 3). You may use the County MapGuide tool at <http://www.dot.pima.gov/gis/maps/mapguide/> to view the exact location of each parcel in greater detail. For aquatic habitat mitigation, the best mitigation of which we are aware would be to restore diverted flows to Cienega Creek at Township 16 South, Range 16 East, Section 14, through acquiring two acres of land and associated surface water rights held by Del Lago Golf associated with Parcel 305-11-024C and the well site at Parcel 305-11-028.

While we are pleased that the Forest Service is exploring compensatory mitigation lands, we would also like to point out that mitigation in the form of land acquisition would not replace reclamation of the mining site, including restoration of watershed functions to the degree possible.

Sincerely,



C.H. Huckelberry
County Administrator

CHH/mjk

Attachments

c: Julia Fonseca, Environmental Planning Manager
Pima County Office of Conservation Science and Environmental Policy

ATTACHMENT 1

Principles for Compensatory Mitigation

Lands protected as compensatory mitigation should be:

- 1) in the area of direct effect or as close as possible to the area of direct effect; and
- 2) adjacent to other protected lands; and
- 3) protected in perpetuity with legal instruments that secure minerals and water, and other land interests; and
- 4) managed for protection of land and water; and
- 5) monitored to assure the mitigation intent is being met; and
- 6) accessible to the public (at least by means of foot); and
- 7) located within the Maeveen Marie Behan Conservation Lands System (CLS); and
- 8) a total acreage that is consistent with the CLS guidelines for mitigation (~8,800 acres)

Based on these principles, the ideal lands would include (in no particular order):

- 1) portions of the Santa Rita Experimental Range adjacent to the Coronado National Forest;
- 2) private lands located inside or adjacent to the Santa Rita units of the National Forest, especially in Pima County close to the mine
- 3) Rosemont's fee-owned lands in or adjacent to the Santa Rita unit of the Coronado National Forest;
- 4) private and state trust lands along Barrel and Davidson Canyons, including lands owned by Rosemont, and state trust lands which are part of Pima County's Bar V Ranch.

Principles for waters for mitigation:

- 1) springs and perennial streams (if their existence is not threatened by the mine itself; and
- 2) inside other protected land areas; and
- 3) provide habitat for listed or candidate species; and
- 4) managed for protection of land and water;
- 5) monitored to assure the mitigation intent is being met;
- 6) Mitigation for water impacts to the Cienega Basin can include the purchase of the one-acre Vail diversion dam and associated water rights along Cienega Creek.

If insufficient land is available from the ideal lands, then our preferences in order of priority are:

1. State and private lands in the Santa Rita unit at similar elevation, including the private lands at the mouth of Madera Canyon;
2. State and private lands adjacent to BLM and County land in the Empire Mountains. The Empire Mountains are an important recharge area in the Cienega Basin. Possesses extensive outcrops of limestone, includes mine claims. Land is situated close to the mine and at a similar elevation. Includes lands in the area of visual effect. Several land owners in the area have approached Pima County with interest in selling.
3. State and private lands adjacent to BLM and County land in the piedmont of the Whetstone Mountains. Land is situated close to the mine and at a similar elevation. Includes lands in the area of visual effect.
4. Private lands along Agua Verde Creek south of the Rincon Mountains. Land includes riparian areas similar to those which would be affected along Davidson and Barrel Canyons. Is close to or adjacent to protected lands.

ATTACHMENT 2

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
303540200	9500	STATE OF ARIZONA	640	STATE LANDS	SANTA RITA EXPERIMENTAL	9.1	331714E	MULTI USE
303540210	9500	STATE OF ARIZONA	157	STATE LANDS	SANTA RITA EXPERIMENTAL	8.4	341714E	MULTI USE
303540210	9500	STATE OF ARIZONA	482	STATE LANDS	SANTA RITA EXPERIMENTAL	8.2	341714E	MULTI USE
303540220	9500	STATE OF ARIZONA	555	STATE LANDS	SANTA RITA EXPERIMENTAL	7.2	351714E	MULTI USE
303540220	9500	STATE OF ARIZONA	84	STATE LANDS	SANTA RITA EXPERIMENTAL	7.6	351714E	MULTI USE
303540230	9500	STATE OF ARIZONA	645	STATE LANDS	SANTA RITA EXPERIMENTAL	6.4	361714E	BIO CORE
304130120	4710	SANTA RITA RANCH INC	631	RANCHING	SANTA RITA EXPERIMENTAL	11.1	361813E	BIO CORE
304293140	9500	STATE OF ARIZONA	14,989	STATE LANDS	SANTA RITA EXPERIMENTAL	5.1	011814E	RIPARIAN
304293140	9500	STATE OF ARIZONA	603	STATE LANDS	SANTA RITA EXPERIMENTAL	5.8	011814E	BIO CORE
304293140	9500	STATE OF ARIZONA	2,130	STATE LANDS	SANTA RITA EXPERIMENTAL	8.3	011814E	BIO CORE
304450180	0014	HENDERSON TERRY M & SARAH E JT/RS	0	VACANT	SANTA RITA EXPERIMENTAL	8.0	221914E	BIO CORE
304450190	0014	HENDERSON TERRY M & SARAH E JT/RS	4	VACANT	SANTA RITA EXPERIMENTAL	8.0	221914E	BIO CORE
304450210	0004	KETTENBACH MICHAEL L TR 1/3 INT ETAL	82	VACANT	SANTA RITA EXPERIMENTAL	7.8	221914E	BIO CORE
304460010	4710	SANTA RITA RANCH INC	84	RANCHING	CORONADO FOREST	6.2	131914E	BIO CORE
304460020	9500	STATE OF ARIZONA	13	STATE LANDS	SANTA RITA EXPERIMENTAL	5.6	131914E	RIPARIAN
304460020	9500	STATE OF ARIZONA	290	STATE LANDS	SANTA RITA EXPERIMENTAL	5.7	131914E	BIO CORE
304460020	9500	STATE OF ARIZONA	168	STATE LANDS	SANTA RITA EXPERIMENTAL	6.0	131914E	BIO CORE
305210030	9500	STATE OF ARIZONA	114	STATE LANDS	BAR V RANCH	9.8	351616E	BIO CORE
305210030	9500	STATE OF ARIZONA	111	STATE LANDS	BAR V RANCH	9.7	351616E	BIO CORE
305210060	9500	STATE OF ARIZONA	320	STATE LANDS	BAR V RANCH	9.9	361616E	BIO CORE
305221540	9500	STATE OF ARIZONA	667	STATE LANDS	SANTA RITA EXPERIMENTAL	5.8	311715E	BIO CORE
305221550	9500	STATE OF ARIZONA	627	STATE LANDS	SANTA RITA EXPERIMENTAL	5.0	321715E	BIO CORE
305221560	9500	STATE OF ARIZONA	629	STATE LANDS	SANTA RITA EXPERIMENTAL	4.4	331715E	BIO CORE
305221570	9500	STATE OF ARIZONA	626	STATE LANDS	SANTA RITA EXPERIMENTAL	3.9	341715E	BIO CORE
305391370	9500	STATE OF ARIZONA	64	STATE LANDS	BAR V RANCH	9.4	021716E	BIO CORE
305391370	9500	STATE OF ARIZONA	233	STATE LANDS	BAR V RANCH	8.9	021716E	BIO CORE
305391640	9500	STATE OF ARIZONA	171	STATE LANDS	DAVIDSON CANYON	4.9	361716E	RIPARIAN
305391650	9500	STATE OF ARIZONA	473	STATE LANDS	BAR V RANCH	9.1	011716E	BIO CORE
305391650	9500	STATE OF ARIZONA	30	STATE LANDS	BAR V RANCH	9.1	011716E	BIO CORE
305391660	9500	STATE OF ARIZONA	242	STATE LANDS	BAR V RANCH	8.4	121716E	BIO CORE
305530050	4717	SANTA RITA RANCH INC	161	RANCHING	SANTA RITA EXPERIMENTAL	1.6	341815E	BIO CORE
305530090	9500	STATE OF ARIZONA	650	STATE LANDS	SANTA RITA EXPERIMENTAL	3.0	031815E	BIO CORE
305530100	9500	STATE OF ARIZONA	644	STATE LANDS	SANTA RITA EXPERIMENTAL	3.6	041815E	BIO CORE
305530110	9500	STATE OF ARIZONA	648	STATE LANDS	SANTA RITA EXPERIMENTAL	4.4	051815E	BIO CORE
305530120	9500	STATE OF ARIZONA	658	STATE LANDS	SANTA RITA EXPERIMENTAL	5.2	061815E	BIO CORE
305530130	9500	STATE OF ARIZONA	664	STATE LANDS	SANTA RITA EXPERIMENTAL	4.7	071815E	BIO CORE
305530130	9500	STATE OF ARIZONA	18	STATE LANDS	SANTA RITA EXPERIMENTAL	5.4	071815E	BIO CORE
305530140	9500	STATE OF ARIZONA	656	STATE LANDS	SANTA RITA EXPERIMENTAL	3.8	081815E	BIO CORE
305530150	9500	STATE OF ARIZONA	644	STATE LANDS	SANTA RITA EXPERIMENTAL	3.0	091815E	BIO CORE
305530200	9500	STATE OF ARIZONA	632	STATE LANDS	SANTA RITA EXPERIMENTAL	2.5	161815E	BIO CORE
305530210	9500	STATE OF ARIZONA	632	STATE LANDS	SANTA RITA EXPERIMENTAL	3.4	171815E	BIO CORE
305530220	9500	STATE OF ARIZONA	103	STATE LANDS	SANTA RITA EXPERIMENTAL	4.5	181815E	BIO CORE
305530220	9500	STATE OF ARIZONA	539	STATE LANDS	SANTA RITA EXPERIMENTAL	4.3	181815E	BIO CORE
305530230	9500	STATE OF ARIZONA	657	STATE LANDS	SANTA RITA EXPERIMENTAL	4.1	191815E	BIO CORE
305530240	9500	STATE OF ARIZONA	648	STATE LANDS	SANTA RITA EXPERIMENTAL	3.1	201815E	BIO CORE

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
305530250	9500	STATE OF ARIZONA	637	STATE LANDS	SANTA RITA EXPERIMENTAL	2.1	211815E	BIO CORE
305530260	9500	STATE OF ARIZONA	636	STATE LANDS	SANTA RITA EXPERIMENTAL	2.1	281815E	BIO CORE
305530270	9500	STATE OF ARIZONA	647	STATE LANDS	SANTA RITA EXPERIMENTAL	3.1	291815E	BIO CORE
305530280	9500	STATE OF ARIZONA	659	STATE LANDS	SANTA RITA EXPERIMENTAL	4.1	301815E	BIO CORE
305530290	9500	STATE OF ARIZONA	659	STATE LANDS	SANTA RITA EXPERIMENTAL	4.1	311815E	BIO CORE
305530300	9500	STATE OF ARIZONA	644	STATE LANDS	SANTA RITA EXPERIMENTAL	3.1	321815E	BIO CORE
305540020	4710	ROSEMONT COPPER CO	14	ROSEMONT	ROSEMONT PARCELS	0.9	131815E	BIO CORE
305540030	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	1.0	131815E	BIO CORE
305540040	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.8	131815E	BIO CORE
305540050	4710	ROSEMONT COPPER CO	22	ROSEMONT	ROSEMONT PARCELS	0.7	131815E	BIO CORE
305540060	4710	ROSEMONT COPPER CO	7	ROSEMONT	ROSEMONT PARCELS	0.8	131815E	BIO CORE
305540070	4710	ROSEMONT COPPER CO	22	ROSEMONT	ROSEMONT PARCELS	0.6	131815E	BIO CORE
305540080	4710	ROSEMONT COPPER CO	22	ROSEMONT	ROSEMONT PARCELS	0.6	131815E	BIO CORE
305540090	4710	ROSEMONT COPPER CO	14	ROSEMONT	ROSEMONT PARCELS	0.7	131815E	BIO CORE
305540100	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.5	131815E	BIO CORE
305540110	4710	ROSEMONT COPPER CO	16	ROSEMONT	ROSEMONT PARCELS	0.5	131815E	BIO CORE
305550010	4710	ROSEMONT COPPER CO	11	ROSEMONT	ROSEMONT PARCELS	1.5	141815E	BIO CORE
305550040	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	1.5	141815E	BIO CORE
305550050	4710	ROSEMONT COPPER CO	15	ROSEMONT	ROSEMONT PARCELS	1.4	141815E	BIO CORE
305550060	4710	ROSEMONT COPPER CO	9	ROSEMONT	ROSEMONT PARCELS	1.3	141815E	BIO CORE
305550070	4710	ROSEMONT COPPER CO	18	ROSEMONT	ROSEMONT PARCELS	1.2	141815E	BIO CORE
305550080	4710	ROSEMONT COPPER CO	9	ROSEMONT	ROSEMONT PARCELS	1.3	141815E	BIO CORE
305550090	4710	ROSEMONT COPPER CO	9	ROSEMONT	ROSEMONT PARCELS	1.1	141815E	BIO CORE
305550100	4710	ROSEMONT COPPER CO	11	ROSEMONT	ROSEMONT PARCELS	1.1	141815E	BIO CORE
305550110	4710	ROSEMONT COPPER CO	19	ROSEMONT	ROSEMONT PARCELS	1.1	141815E	BIO CORE
305550130	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	1.0	141815E	BIO CORE
305550140	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	1.0	141815E	BIO CORE
305550150	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.9	141815E	BIO CORE
305560040	4710	ROSEMONT COPPER CO	18	ROSEMONT	ROSEMONT PARCELS	1.9	151815E	BIO CORE
305560050	4710	ROSEMONT COPPER CO	17	ROSEMONT	ROSEMONT PARCELS	1.7	151815E	BIO CORE
305560060	4710	ROSEMONT COPPER CO	16	ROSEMONT	ROSEMONT PARCELS	1.6	151815E	BIO CORE
305560070	4710	ROSEMONT COPPER CO	13	ROSEMONT	ROSEMONT PARCELS	1.7	151815E	BIO CORE
305580080	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.7	231815E	BIO CORE
305580090	4710	ROSEMONT COPPER CO	15	ROSEMONT	ROSEMONT PARCELS	0.6	231815E	BIO CORE
305580090	4710	ROSEMONT COPPER CO	1	ROSEMONT	ROSEMONT PARCELS	0.6	231815E	BIO CORE
305580100	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.5	231815E	BIO CORE
305580110	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.8	231815E	BIO CORE
305580120	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.8	231815E	BIO CORE
305580130	4710	ROSEMONT COPPER CO	6	ROSEMONT	ROSEMONT PARCELS	1.1	231815E	BIO CORE
305580140	4710	ROSEMONT COPPER CO	13	ROSEMONT	ROSEMONT PARCELS	1.1	231815E	BIO CORE
305580150	4710	ROSEMONT COPPER CO	18	ROSEMONT	ROSEMONT PARCELS	1.0	231815E	BIO CORE
305580160	4710	ROSEMONT COPPER CO	3	ROSEMONT	ROSEMONT PARCELS	1.3	231815E	BIO CORE
305580170	4710	ROSEMONT COPPER CO	16	ROSEMONT	ROSEMONT PARCELS	1.3	231815E	BIO CORE
305580170	4710	ROSEMONT COPPER CO	0	ROSEMONT	ROSEMONT PARCELS	1.6	231815E	BIO CORE
305580180	4710	ROSEMONT COPPER CO	15	ROSEMONT	ROSEMONT PARCELS	1.4	231815E	BIO CORE

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
305580190	4710	ROSEMONT COPPER CO	1	ROSEMONT	ROSEMONT PARCELS	1.5	231815E	BIO CORE
305580200	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	1.2	231815E	BIO CORE
305580220	4710	ROSEMONT COPPER CO	5	ROSEMONT	ROSEMONT PARCELS	1.3	231815E	BIO CORE
305580250	4710	ROSEMONT COPPER CO	2	ROSEMONT	ROSEMONT PARCELS	1.2	231815E	BIO CORE
305580260	4710	ROSEMONT COPPER CO	5	ROSEMONT	ROSEMONT PARCELS	1.0	231815E	BIO CORE
305580270	4710	ROSEMONT COPPER CO	2	ROSEMONT	ROSEMONT PARCELS	1.0	231815E	BIO CORE
305580280	4715	ROSEMONT COPPER CO	11	ROSEMONT	ROSEMONT PARCELS	0.5	231815E	BIO CORE
305590060	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.3	241815E	BIO CORE
305590070	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.0	241815E	BIO CORE
305590070	4710	ROSEMONT COPPER CO	1	ROSEMONT	ROSEMONT PARCELS	0.0	241815E	BIO CORE
305590080	4710	ROSEMONT COPPER CO	16	ROSEMONT	ROSEMONT PARCELS	0.0	241815E	BIO CORE
305590090	4710	ROSEMONT COPPER CO	17	ROSEMONT	ROSEMONT PARCELS	0.0	241815E	BIO CORE
305590100	4710	ROSEMONT COPPER CO	16	ROSEMONT	ROSEMONT PARCELS	0.0	241815E	BIO CORE
305590110	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.1	241815E	BIO CORE
305590120	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.2	241815E	RIPARIAN
305590130	4710	ROSEMONT COPPER CO	15	ROSEMONT	ROSEMONT PARCELS	0.2	241815E	BIO CORE
305590140	4710	ROSEMONT COPPER CO	10	ROSEMONT	ROSEMONT PARCELS	0.4	241815E	BIO CORE
305590150	4710	ROSEMONT COPPER CO	16	ROSEMONT	ROSEMONT PARCELS	0.3	241815E	BIO CORE
305590160	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.3	241815E	BIO CORE
305590170	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.4	241815E	RIPARIAN
305590180	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.5	241815E	BIO CORE
305590190	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.6	241815E	BIO CORE
305590200	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.3	241815E	BIO CORE
305610040	4710	ROSEMONT COPPER CO	2	ROSEMONT	ROSEMONT PARCELS	0.0	361815E	BIO CORE
305620140	9500	STATE OF ARIZONA	637	STATE LANDS	DAVIDSON CANYON	3.2	021816E	BIO CORE
305620250	9500	STATE OF ARIZONA	537	STATE LANDS	DAVIDSON CANYON	2.4	111816E	BIO CORE
305620250	9500	STATE OF ARIZONA	79	STATE LANDS	DAVIDSON CANYON	3.0	111816E	RIPARIAN
305620320	9500	STATE OF ARIZONA	634	STATE LANDS	DAVIDSON CANYON	1.5	261816E	MULTI USE
305630040	4710	ROSEMONT COPPER CO	4	ROSEMONT	ROSEMONT PARCELS	0.0	191816E	BIO CORE
305660050	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.0	011915E	BIO CORE
305660070	4717	SANTA RITA RANCH INC	19	RANCHING	SANTA RITA EXPERIMENTAL	3.9	161915E	BIO CORE
305660080	4717	MC GIBBON WILLIAM A & NANCY H JT/RS	9	RANCHING	SANTA RITA EXPERIMENTAL	4.0	171915E	BIO CORE
305660090	0004	MC CULLOUGH ROBERT B & GRACE G TR	13	VACANT	CORONADO FOREST	2.7	231915E	MULTI USE
305660110	9500	STATE OF ARIZONA	318	STATE LANDS	SANTA RITA EXPERIMENTAL	1.7	031915E	BIO CORE
305660120	9500	STATE OF ARIZONA	204	STATE LANDS	SANTA RITA EXPERIMENTAL	2.9	091915E	BIO CORE
305660120	9500	STATE OF ARIZONA	24	STATE LANDS	SANTA RITA EXPERIMENTAL	2.5	091915E	BIO CORE
305660120	9500	STATE OF ARIZONA	202	STATE LANDS	SANTA RITA EXPERIMENTAL	2.6	091915E	BIO CORE
305660120	9500	STATE OF ARIZONA	78	STATE LANDS	SANTA RITA EXPERIMENTAL	3.3	091915E	BIO CORE
305660130	9500	STATE OF ARIZONA	73	STATE LANDS	SANTA RITA EXPERIMENTAL	2.0	101915E	RIPARIAN
305660130	9500	STATE OF ARIZONA	199	STATE LANDS	SANTA RITA EXPERIMENTAL	2.1	101915E	BIO CORE
305910160	0014	KPK HOLDING COMPANY LLC	39	VACANT	DAVIDSON CANYON	4.0	011816E	RIPARIAN
305910180	0014	CONTRERAS NORMA A	36	VACANT	DAVIDSON CANYON	4.6	011816E	BIO CORE
305910260	0014	SPIVACK KELLY EILEEN & RIOUX EILEEN E L	8	VACANT	DAVIDSON CANYON	4.4	011816E	BIO CORE
305910320	0014	HICKS THOMAS R & PATTERSON DIANNE JT/RS	18	VACANT	DAVIDSON CANYON	4.2	121816E	BIO CORE
305910360	0014	COLE JUDITH	12	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
305910370	0014	COLE JUDITH	8	VACANT	DAVIDSON CANYON	4.2	121816E	BIO CORE
305910380	0014	CLARK LARRY D	20	VACANT	DAVIDSON CANYON	4.0	121816E	BIO CORE
305910390	0014	MC CAIN CHARLES R & JILL STEVENS	20	VACANT	DAVIDSON CANYON	3.9	121816E	RIPARIAN
305910420	0014	MC CAIN CHARLES R & JILL STEVENS	2	VACANT	DAVIDSON CANYON	3.7	121816E	BIO CORE
305910440	0014	BOUCHARD PIERRE & ARLENE CP/RS	5	VACANT	DAVIDSON CANYON	3.7	121816E	BIO CORE
305910450	0014	BOUCHARD PIERRE & ARLENE CP/RS	5	VACANT	DAVIDSON CANYON	3.8	121816E	BIO CORE
305910460	0014	TANNER ROGER D	10	VACANT	DAVIDSON CANYON	3.8	121816E	BIO CORE
305910470	0014	HOWELL STEPHEN A	20	VACANT	DAVIDSON CANYON	3.8	121816E	BIO CORE
305910480	0014	HOWELL STEPHEN A	29	VACANT	DAVIDSON CANYON	3.9	121816E	BIO CORE
305910490	0014	SHERMAN DONALD F & GERALDINE K JT/RS	10	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910550	0014	D & B FAMILY TRUST	1	VACANT	DAVIDSON CANYON	4.2	121816E	BIO CORE
305910560	0014	LESZCZYNSKI LEON PAUL & CAROL ELLEN JT/RS	1	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910570	0014	SCHOON GREGORY D	1	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910580	0014	D & B FAMILY TRUST	1	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910590	0014	D & B FAMILY TRUST	1	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910600	0014	SULLIVAN W & J TRUST	1	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910620	0014	MORRIS RAYMOND E	2	VACANT	DAVIDSON CANYON	4.1	121816E	BIO CORE
305910650	0014	MEDSKER JEFFREY C & JO ANNE K JT/RS	5	VACANT	DAVIDSON CANYON	4.0	121816E	BIO CORE
305910690	0014	BLOUNT LOIS J	9	VACANT	DAVIDSON CANYON	3.8	121816E	BIO CORE
305910730	0014	EDMUNDS HARVEY S TR	13	VACANT	DAVIDSON CANYON	3.6	121816E	BIO CORE
305910750	0014	BOUCHARD PIERRE L & ARLENE M JT/RS	21	VACANT	DAVIDSON CANYON	3.5	121816E	BIO CORE
305910760	0014	BOUCHARD PIERRE L & ARLENE M JT/RS	16	VACANT	DAVIDSON CANYON	3.5	121816E	BIO CORE
305910780	0011	BOUCHARD PIERRE L & ARLENE M	4	VACANT	DAVIDSON CANYON	3.5	121816E	BIO CORE
305910840	0014	HANNAH JACK	0	VACANT	DAVIDSON CANYON	3.5	121816E	BIO CORE
306010270	9500	STATE OF ARIZONA	117	STATE LANDS	BAR V RANCH	11.4	301617E	BIO CORE
306010350	9500	STATE OF ARIZONA	252	STATE LANDS	BAR V RANCH	11.1	321617E	BIO CORE
306010350	9500	STATE OF ARIZONA	311	STATE LANDS	BAR V RANCH	10.6	321617E	BIO CORE
306050070	9500	STATE OF ARIZONA	40	STATE LANDS	BAR V RANCH	12.0	281617E	BIO CORE
306060040	9500	STATE OF ARIZONA	313	STATE LANDS	BAR V RANCH	11.5	291617E	BIO CORE
306080070	9500	STATE OF ARIZONA	5	STATE LANDS	BAR V RANCH	11.7	341617E	BIO CORE
306150270	9500	STATE OF ARIZONA	628	STATE LANDS	BAR V RANCH	8.9	081717E	BIO CORE
306150280	9500	STATE OF ARIZONA	632	STATE LANDS	BAR V RANCH	9.5	091717E	BIO CORE
306150290	9500	STATE OF ARIZONA	643	STATE LANDS	BAR V RANCH	10.1	101717E	BIO CORE
306150330	9500	STATE OF ARIZONA	628	STATE LANDS	BAR V RANCH	9.4	151717E	BIO CORE
306150340	9500	STATE OF ARIZONA	617	STATE LANDS	BAR V RANCH	8.1	171717E	BIO CORE
306150350	9500	STATE OF ARIZONA	611	STATE LANDS	BAR V RANCH	7.3	201717E	BIO CORE
306150370	9500	STATE OF ARIZONA	631	STATE LANDS	DAVIDSON CANYON	5.9	301717E	RIPARIAN
306150480	0014	TORGERSON JOEL ERIC	9	VACANT	DAVIDSON CANYON	7.7	191717E	BIO CORE
306150550	9500	STATE OF ARIZONA	234	STATE LANDS	DAVIDSON CANYON	6.7	191717E	RIPARIAN
306150580	4717	ANDRADA RANCL LTD PARTNERSHIP	276	RANCHING	DAVIDSON CANYON	7.0	191717E	BIO CORE
306150620	0014	HERTEL THOMAS A & PAMELA E CP/RS	8	VACANT	DAVIDSON CANYON	7.3	191717E	BIO CORE
306150630	9500	STATE OF ARIZONA	394	STATE LANDS	DAVIDSON CANYON	7.7	181717E	BIO CORE
306150640	0014	REYNOLDS DONALD R & CAROLYN A JT/RS	9	VACANT	DAVIDSON CANYON	8.2	181717E	BIO CORE
306150680	0014	GILBERT MIKE S	10	VACANT	DAVIDSON CANYON	8.0	181717E	BIO CORE
306150710	0014	ROSENFELD JAMES J & MURIEL E JT/RS	10	VACANT	DAVIDSON CANYON	7.7	181717E	RIPARIAN

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
306150720	0014	MULLEN MATTHEW D & TERESA M CP/RS	10	VACANT	DAVIDSON CANYON	7.8	181717E	BIO CORE
306150740	0014	KONEN LEROY & CYNTHIA LIVING TR	7	VACANT	DAVIDSON CANYON	7.9	181717E	BIO CORE
306150750	0014	ADAMS WILLARD M & DEBORAH A JT/RS	7	VACANT	DAVIDSON CANYON	7.9	181717E	BIO CORE
306150780	0014	SCHEOPTNR NORMAN D & JEANNETTE E JT/RS	7	VACANT	DAVIDSON CANYON	7.8	181717E	BIO CORE
306150790	0014	CLAY YVONNE C REVOC TR	4	VACANT	DAVIDSON CANYON	7.7	181717E	BIO CORE
306150810	0014	PATTERSON JOSEPH R & MC NABOE	14	VACANT	DAVIDSON CANYON	7.6	181717E	BIO CORE
306150820	0014	KELESIS FAMILY TRUST	8	VACANT	DAVIDSON CANYON	7.5	181717E	BIO CORE
306160050	9500	STATE OF ARIZONA	30	STATE LANDS	BAR V RANCH	11.9	031717E	RIPARIAN
306160050	9500	STATE OF ARIZONA	567	STATE LANDS	BAR V RANCH	10.9	031717E	BIO CORE
306160060	9500	STATE OF ARIZONA	629	STATE LANDS	BAR V RANCH	10.3	041717E	BIO CORE
306160070	9500	STATE OF ARIZONA	621	STATE LANDS	BAR V RANCH	9.7	051717E	BIO CORE
306170030	0014	THAYER RUTH THURSTON	2	VACANT	DAVIDSON CANYON	6.0	311717E	RIPARIAN
306170040	0014	MORALES ALFREDO	1	VACANT	DAVIDSON CANYON	6.1	311717E	RIPARIAN
306170090	9500	STATE OF ARIZONA	39	STATE LANDS	DAVIDSON CANYON	6.2	311717E	BIO CORE
306170140	0014	BURTON MICHAEL & KAREN M CP/RS	12	VACANT	DAVIDSON CANYON	5.4	311717E	BIO CORE
306170160	0014	NIKRASCH & LOSCIALPO FAMILY REVOCABLE LIVIT	1	VACANT	DAVIDSON CANYON	5.4	311717E	BIO CORE
306170210	0014	LOOG PATRICIA ANN	9	VACANT	DAVIDSON CANYON	5.4	311717E	BIO CORE
306170230	0014	LAWWILL BENJAMIN H & JANET W JT/RS	9	VACANT	DAVIDSON CANYON	5.5	311717E	BIO CORE
306170240	0014	TRUJILLO P R III & ELIZABETH A JT/RS	2	VACANT	DAVIDSON CANYON	5.7	311717E	BIO CORE
307150030	4710	BARCHAS SARAH ELIZABETH	29	RANCHING	CORONADO FOREST	1.7	101916E	MULTI USE
307160120	4710	BARCHAS SARAH ELIZABETH	40	RANCHING	CORONADO FOREST	2.3	151916E	MULTI USE
307200040	4717	ROSEMONT COPPER COMPANY	5	ROSEMONT	ROSEMONT PARCELS	2.1	211916E	MULTI USE
307205040	6800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.2	211916E	MULTI USE
307210050	0004	WAGONER FAMILY TR	40	VACANT	CORONADO FOREST	3.2	221916E	MULTI USE
30413106B	9500	STATE OF ARIZONA	380	STATE LANDS	SANTA RITA EXPERIMENTAL	11.1	251813E	BIO CORE
30413106C	9500	STATE OF ARIZONA	69	STATE LANDS	SANTA RITA EXPERIMENTAL	11.1	241813E	RIPARIAN
30413106C	9500	STATE OF ARIZONA	30	STATE LANDS	SANTA RITA EXPERIMENTAL	11.1	241813E	BIO CORE
30445011B	9500	STATE OF ARIZONA	349	STATE LANDS	SANTA RITA EXPERIMENTAL	5.0	011914E	BIO CORE
30445011B	9500	STATE OF ARIZONA	1,293	STATE LANDS	SANTA RITA EXPERIMENTAL	5.7	011914E	RIPARIAN
30445011B	9500	STATE OF ARIZONA	4,901	STATE LANDS	SANTA RITA EXPERIMENTAL	6.9	011914E	BIO CORE
30445011B	9500	STATE OF ARIZONA	801	STATE LANDS	SANTA RITA EXPERIMENTAL	5.2	011914E	BIO CORE
30445011B	9500	STATE OF ARIZONA	0	STATE LANDS	SANTA RITA EXPERIMENTAL	6.8	011914E	BIO CORE
30445011B	9500	STATE OF ARIZONA	969	STATE LANDS	SANTA RITA EXPERIMENTAL	6.4	011914E	RIPARIAN
30445011B	9500	STATE OF ARIZONA	57	STATE LANDS	SANTA RITA EXPERIMENTAL	5.9	011914E	BIO CORE
30445011B	9500	STATE OF ARIZONA	25	STATE LANDS	SANTA RITA EXPERIMENTAL	7.9	011914E	BIO CORE
30445020C	0014	LUDWIG ERIC R	4	VACANT	SANTA RITA EXPERIMENTAL	7.9	221914E	BIO CORE
30539163A	9500	STATE OF ARIZONA	401	STATE LANDS	DAVIDSON CANYON	4.6	361716E	BIO CORE
30553003B	0014	QUEST PAT	9	VACANT	SANTA RITA EXPERIMENTAL	0.9	261815E	BIO CORE
30553003C	0014	BIKSSON ENTERPRISES LIMITED PARTNERSHIP	10	VACANT	SANTA RITA EXPERIMENTAL	0.9	261815E	BIO CORE
30553003F	9500	STATE OF ARIZONA	121	STATE LANDS	SANTA RITA EXPERIMENTAL	0.6	261815E	BIO CORE
30553004C	0014	TOVAR ENRIQUE	19	VACANT	SANTA RITA EXPERIMENTAL	1.5	271815E	BIO CORE
30553004D	4710	AVRA VALLEY RANCH & PROPERTIES LLC	39	RANCHING	SANTA RITA EXPERIMENTAL	1.6	271815E	BIO CORE
30553004G	0014	VESTERDAL ALAN FRED	11	VACANT	SANTA RITA EXPERIMENTAL	1.9	271815E	BIO CORE
30553004H	4710	AVRA VALLEY RANCH & PROPERTIES LLC	40	RANCHING	SANTA RITA EXPERIMENTAL	1.1	271815E	BIO CORE
30553004J	0014	GANT LONNY & LISA JT/RS	18	VACANT	SANTA RITA EXPERIMENTAL	1.4	271815E	BIO CORE

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
30553004M	0014	LANSKY RICHARD J & CORAZON B	14	VACANT	SANTA RITA EXPERIMENTAL	2.0	271815E	BIO CORE
30553006A	9500	STATE OF ARIZONA	124	STATE LANDS	SANTA RITA EXPERIMENTAL	1.9	341815E	BIO CORE
30553006B	9500	STATE OF ARIZONA	564	STATE LANDS	SANTA RITA EXPERIMENTAL	2.1	341815E	BIO CORE
30553006C	9500	STATE OF ARIZONA	121	STATE LANDS	SANTA RITA EXPERIMENTAL	1.6	341815E	BIO CORE
30553007A	9500	STATE OF ARIZONA	319	STATE LANDS	SANTA RITA EXPERIMENTAL	1.1	271815E	BIO CORE
30554012A	4710	ROSEMONT COPPER CO	20	ROSEMONT	ROSEMONT PARCELS	0.6	131815E	BIO CORE
30555012A	4710	ROSEMONT COPPER CO	5	ROSEMONT	ROSEMONT PARCELS	1.3	141815E	RIPARIAN
30557004D	4710	ROSEMONT COPPER CO	10	ROSEMONT	ROSEMONT PARCELS	1.8	221815E	BIO CORE
30558021A	4710	ROSEMONT COPPER CO	5	ROSEMONT	ROSEMONT PARCELS	1.2	231815E	RIPARIAN
30558023A	4710	ROSEMONT COPPER CO	3	ROSEMONT	ROSEMONT PARCELS	1.3	231815E	BIO CORE
30558023B	4710	ROSEMONT COPPER CO	4	ROSEMONT	ROSEMONT PARCELS	1.2	231815E	RIPARIAN
30558024A	4710	ROSEMONT COPPER CO	5	ROSEMONT	ROSEMONT PARCELS	1.1	231815E	BIO CORE
30558034C	4710	ROSEMONT COPPER CO	2	ROSEMONT	ROSEMONT PARCELS	1.0	231815E	BIO CORE
30559021A	4710	ROSEMONT COPPER CO	21	ROSEMONT	ROSEMONT PARCELS	0.0	241815E	BIO CORE
30562006B	4710	ROSEMONT COPPER CO	3	ROSEMONT	ROSEMONT PARCELS	2.3	141816E	BIO CORE
30562006B	4710	ROSEMONT COPPER CO	31	ROSEMONT	ROSEMONT PARCELS	2.1	141816E	BIO CORE
30562006C	9500	STATE OF ARIZONA	366	STATE LANDS	DAVIDSON CANYON	1.8	141816E	BIO CORE
30562006C	9500	STATE OF ARIZONA	207	STATE LANDS	DAVIDSON CANYON	2.0	141816E	BIO CORE
30562007D	4710	ROSEMONT COPPER CO	39	ROSEMONT	ROSEMONT PARCELS	1.4	151816E	BIO CORE
30562007E	4710	ROSEMONT COPPER CO	39	ROSEMONT	ROSEMONT PARCELS	1.6	151816E	BIO CORE
30562007G	4710	ROSEMONT COPPER CO	55	ROSEMONT	ROSEMONT PARCELS	1.6	151816E	BIO CORE
30562007G	4710	ROSEMONT COPPER CO	15	ROSEMONT	ROSEMONT PARCELS	1.7	151816E	BIO CORE
30562007H	4710	ROSEMONT COPPER CO	159	ROSEMONT	ROSEMONT PARCELS	1.7	151816E	BIO CORE
30562008C	4710	ROSEMONT COPPER CO	60	ROSEMONT	ROSEMONT PARCELS	0.6	211816E	BIO CORE
30562008F	4717	ROSEMONT COPPER CO	35	ROSEMONT	ROSEMONT PARCELS	0.5	211816E	BIO CORE
30562008G	4717	ROSEMONT COPPER CO	5	ROSEMONT	ROSEMONT PARCELS	0.5	211816E	BIO CORE
30562008H	4710	ROSEMONT COPPER CO	26	ROSEMONT	ROSEMONT PARCELS	0.5	211816E	BIO CORE
30562008J	4710	ROSEMONT COPPER CO	35	ROSEMONT	ROSEMONT PARCELS	0.3	211816E	BIO CORE
30562009A	4710	ROSEMONT COPPER CO	158	ROSEMONT	ROSEMONT PARCELS	2.0	231816E	BIO CORE
30562009B	9500	STATE OF ARIZONA	475	STATE LANDS	DAVIDSON CANYON	1.5	231816E	BIO CORE
30562011A	4710	ROSEMONT COPPER CO	40	ROSEMONT	ROSEMONT PARCELS	1.4	271816E	RIPARIAN
30563003A	4710	ROSEMONT COPPER CO	19	ROSEMONT	ROSEMONT PARCELS	0.0	191816E	BIO CORE
30566001C	4710	ROBINSON CATTLE LLC	34	RANCHING	SANTA RITA EXPERIMENTAL	2.2	101915E	BIO CORE
30566001D	4710	ROBINSON JOE R	5	RANCHING	SANTA RITA EXPERIMENTAL	2.4	101915E	BIO CORE
30566001E	4717	ROBINSON CATTLE LLC	40	RANCHING	SANTA RITA EXPERIMENTAL	2.4	101915E	BIO CORE
30566001J	4710	ROBINSON JOE R	78	RANCHING	SANTA RITA EXPERIMENTAL	2.7	091915E	BIO CORE
30566001J	4710	ROBINSON JOE R	1	RANCHING	SANTA RITA EXPERIMENTAL	2.8	091915E	BIO CORE
30566003B	9500	STATE OF ARIZONA	1,983	STATE LANDS	SANTA RITA EXPERIMENTAL	2.2	041915E	BIO CORE
30566003B	9500	STATE OF ARIZONA	1,532	STATE LANDS	SANTA RITA EXPERIMENTAL	3.6	041915E	BIO CORE
30566003B	9500	STATE OF ARIZONA	725	STATE LANDS	SANTA RITA EXPERIMENTAL	3.3	041915E	BIO CORE
30591001A	0014	FREELAND REVOCABLE LIVING TR	18	VACANT	DAVIDSON CANYON	4.4	011816E	BIO CORE
30591001E	0014	ROMERO ALFREDO D	6	VACANT	DAVIDSON CANYON	4.5	011816E	BIO CORE
30591002A	0014	FREELAND REVOC LIVING TR	20	VACANT	DAVIDSON CANYON	4.6	011816E	BIO CORE
30591002B	0014	HELIN GLORIA J	18	VACANT	DAVIDSON CANYON	4.5	011816E	BIO CORE
30591004A	0014	GAULT DONNA E REVOCABLE TRUST	16	VACANT	DAVIDSON CANYON	4.2	011816E	BIO CORE

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
30591006D	0014	DOWNEY DARRELL	6	VACANT	DAVIDSON CANYON	4.0	011816E	BIO CORE
30591006J	0014	DOWNEY DAVID A	10	VACANT	DAVIDSON CANYON	3.9	011816E	BIO CORE
30591006K	0014	DOWNEY DARRELL	4	VACANT	DAVIDSON CANYON	3.9	011816E	BIO CORE
30591017D	0014	REITZ GEORGE R & CAROL A REVOCABLE TRUST	19	VACANT	DAVIDSON CANYON	4.3	011816E	BIO CORE
30591019A	0014	JRS REALTY GROUP LLC	15	VACANT	DAVIDSON CANYON	4.5	011816E	RIPARIAN
30591019C	0014	LEKAWA RAYMOND E & ROSE M CP/RS	4	VACANT	DAVIDSON CANYON	4.4	011816E	BIO CORE
30591019D	0014	LEKAWA RAYMOND E & ROSE M CP/RS	4	VACANT	DAVIDSON CANYON	4.4	011816E	BIO CORE
30591019E	0014	LEKAWA RAYMOND E & ROSE M CP/RS	4	VACANT	DAVIDSON CANYON	4.5	011816E	BIO CORE
30591019F	0014	LEKAWA RAYMOND E & ROSE M CP/RS	4	VACANT	DAVIDSON CANYON	4.5	011816E	BIO CORE
30591019G	0014	LEKAWA RAYMOND E & ROSE M CP/RS	4	VACANT	DAVIDSON CANYON	4.5	011816E	BIO CORE
30591020A	0014	WILKINSON MICHAEL J & DIANE REVOC LIVING TR	20	VACANT	DAVIDSON CANYON	4.2	011816E	RIPARIAN
30591020B	0014	FUND LUCY ANN	13	VACANT	DAVIDSON CANYON	4.4	011816E	RIPARIAN
30591021B	0014	CONTRERAS NORMA A	16	VACANT	DAVIDSON CANYON	4.5	011816E	RIPARIAN
30591022A	0014	PERNO EUGENE M & SUSAN K JT/RS	25	VACANT	DAVIDSON CANYON	4.7	011816E	BIO CORE
30591022B	0014	PERNO EUGENE M & SUSAN K	12	VACANT	DAVIDSON CANYON	4.7	011816E	BIO CORE
30591023A	0014	CHAVEZ LARRY S	8	VACANT	DAVIDSON CANYON	5.1	011816E	BIO CORE
30591023B	0014	PINION JERRY W & VIRGINIA A JT/RS	29	VACANT	DAVIDSON CANYON	4.9	011816E	BIO CORE
30591024B	0014	PINION JERRY W & VIRGINIA A JT/RS	12	VACANT	DAVIDSON CANYON	4.8	011816E	BIO CORE
30591025A	0014	JONES LANITA J & BATELLI PENNY L JT/RS	10	VACANT	DAVIDSON CANYON	4.5	011816E	BIO CORE
30591080A	0014	MACK PATRICK A & CAROL L JT/RS	4	VACANT	DAVIDSON CANYON	3.3	121816E	BIO CORE
30591081A	0014	CHUK MICHAEL & VIRAMONTES OLIVIA JT/RS	5	VACANT	DAVIDSON CANYON	3.4	121816E	BIO CORE
30591082A	0014	OLSON JOHN	8	VACANT	DAVIDSON CANYON	3.3	121816E	BIO CORE
30591082B	0014	CHUK MICHAEL	1	VACANT	DAVIDSON CANYON	3.4	121816E	BIO CORE
30591085D	0014	COOPER ANDREW E & DEBORAH L CP/RS	4	VACANT	DAVIDSON CANYON	3.6	121816E	BIO CORE
30591085F	0014	HELM ROGER	5	VACANT	DAVIDSON CANYON	3.7	121816E	BIO CORE
30591087A	0014	KRAMP JAMES R REVOCABLE TR	7	VACANT	DAVIDSON CANYON	3.7	121816E	BIO CORE
30591087C	0014	O'NEIL GARY I	7	VACANT	DAVIDSON CANYON	3.8	121816E	BIO CORE
30591087F	0014	FRIEDMAN ALAN & GAY REVOCABLE TR	6	VACANT	DAVIDSON CANYON	3.7	121816E	BIO CORE
30601025A	9500	STATE OF ARIZONA	157	STATE LANDS	BAR V RANCH	11.1	331617E	BIO CORE
30607003A	9500	STATE OF ARIZONA	66	STATE LANDS	BAR V RANCH	11.0	311617E	BIO CORE
30607003A	9500	STATE OF ARIZONA	74	STATE LANDS	BAR V RANCH	10.5	311617E	BIO CORE
30607004A	9500	STATE OF ARIZONA	74	STATE LANDS	BAR V RANCH	10.6	311617E	BIO CORE
30607004A	9500	STATE OF ARIZONA	60	STATE LANDS	BAR V RANCH	10.2	311617E	BIO CORE
30615001B	9500	STATE OF ARIZONA	451	STATE LANDS	BAR V RANCH	9.3	061717E	BIO CORE
306150005C	9500	STATE OF ARIZONA	401	STATE LANDS	BAR V RANCH	8.0	211717E	BIO CORE
30615010B	9500	STATE OF ARIZONA	315	STATE LANDS	BAR V RANCH	8.6	071717E	BIO CORE
30615011B	9500	STATE OF ARIZONA	310	STATE LANDS	BAR V RANCH	9.1	161717E	BIO CORE
30615057A	0014	MULLINS GARY L & DAPHNE D CP/RS	12	VACANT	DAVIDSON CANYON	7.3	191717E	BIO CORE
30615073B	0014	ORMSBY WILLIAM R JR & DARLENE G CP/RS	10	VACANT	DAVIDSON CANYON	7.6	181717E	BIO CORE
30615073C	0014	AVERY RICHARD A & MARCIA L JT/RS	10	VACANT	DAVIDSON CANYON	7.7	181717E	RIPARIAN
30615073D	0014	STAM RYAN C	6	VACANT	DAVIDSON CANYON	7.8	181717E	BIO CORE
30615076A	0014	CORDARO HANK C	15	VACANT	DAVIDSON CANYON	7.9	181717E	BIO CORE
30615076B	0014	O'NEILL CHRISTOPHER H	6	VACANT	DAVIDSON CANYON	8.0	181717E	BIO CORE
30617001C	0014	ULRICH PAMELA J	10	VACANT	DAVIDSON CANYON	5.9	311717E	BIO CORE
30617001E	0014	ROMERO ALFREDO D	11	VACANT	DAVIDSON CANYON	6.1	311717E	BIO CORE

POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE










PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRSS	CLS
30617001H	0014	TRUJILLO ROY J & REGINA L JT/RS	40	VACANT	DAVIDSON CANYON	6.0	311717E	BIO CORE
30617001T	0014	WATTS JAMES W & JIMMIE NELL JT/RS	6	VACANT	DAVIDSON CANYON	6.0	311717E	BIO CORE
30617002J	0014	LOZINSKI RICHARD M & LUCINDA L JT/RS	10	VACANT	DAVIDSON CANYON	5.7	311717E	BIO CORE
30617002P	0014	MIKLOCHIK J MICHAEL & RITTER LINDA A CP/RS	5	VACANT	DAVIDSON CANYON	5.8	311717E	BIO CORE
30617002Q	0014	STEPHENS TODD M & LAURA M CP/RS	5	VACANT	DAVIDSON CANYON	5.9	311717E	BIO CORE
30617002S	0014	EIRICH CHRISTOPHER W & MAUREEN K CP/RS	8	VACANT	DAVIDSON CANYON	5.5	311717E	BIO CORE
30617002W	0014	GLOVER KARA	4	VACANT	DAVIDSON CANYON	5.7	311717E	BIO CORE
30617002X	0014	GLOVER KARA	4	VACANT	DAVIDSON CANYON	5.6	311717E	BIO CORE
30617002Y	0014	O'DONNELL MARC	10	VACANT	DAVIDSON CANYON	5.6	311717E	BIO CORE
30617005A	0014	MORALES RAMON	1	VACANT	DAVIDSON CANYON	6.0	311717E	RIPARIAN
30617010D	0014	BALDWIN LORRIE A	20	VACANT	DAVIDSON CANYON	5.8	311717E	BIO CORE
30617010F	0014	WILLIAMS STEPHEN C	8	VACANT	DAVIDSON CANYON	5.6	311717E	BIO CORE
30617010G	0014	SWAN WAYNE E & DONNA M JT/RS	10	VACANT	DAVIDSON CANYON	5.6	311717E	BIO CORE
30617010H	0014	GOLD ABE	8	VACANT	DAVIDSON CANYON	5.5	311717E	BIO CORE
30617010J	0014	ROMERO ALFREDO D	21	VACANT	DAVIDSON CANYON	6.0	311717E	BIO CORE
30617010K	0014	ETCHART GREGORY A & PAMELA K JT/RS	20	VACANT	DAVIDSON CANYON	5.9	311717E	BIO CORE
30617017A	0014	PROBST MARK A & EVANS PATRICIA S JT/RS	4	VACANT	DAVIDSON CANYON	5.2	311717E	BIO CORE
30617018B	0014	REAM JOHN T & BAUMANN-REAM	10	VACANT	DAVIDSON CANYON	5.2	311717E	BIO CORE
30617018C	0014	SAWICKI MICHAEL A & LINDA J CP/RS	8	VACANT	DAVIDSON CANYON	5.3	311717E	BIO CORE
30617018D	0014	HSIAO CHING-SONG GENE & YU-MEI UNA TR	10	VACANT	DAVIDSON CANYON	5.3	311717E	BIO CORE
30617020A	0014	ESTES AARON	5	VACANT	DAVIDSON CANYON	5.5	311717E	BIO CORE
30617022A	0014	LINN GEORGE W IV & GEE KAMI L JT/RS	5	VACANT	DAVIDSON CANYON	5.6	311717E	BIO CORE
30617022B	0014	LINN GEORGE W IV & GEE KAMI L JT/RS	5	VACANT	DAVIDSON CANYON	5.5	311717E	BIO CORE
30617025A	0014	TRUJILLO P R III & ELIZABETH A JT/RS	9	VACANT	DAVIDSON CANYON	5.7	311717E	BIO CORE
30617025B	0014	TRUJILLO P R III & ELIZABETH A JT/RS	40	VACANT	DAVIDSON CANYON	5.7	311717E	BIO CORE
30713007F	0014	UROUIDES JOSEPHINE P	20	VACANT	CORONADO FOREST	2.6	191916E	MULTI USE
30713007J	0014	UROUIDES JOSEPHINE P	13	VACANT	CORONADO FOREST	2.6	191916E	MULTI USE
30713007P	0014	DAVIS H JOHN & AUDREY LIFE EST THEN TO	5	VACANT	CORONADO FOREST	2.8	191916E	RIPARIAN
30713007Q	0014	SOLSBERRY DONNA DAVIS	21	VACANT	CORONADO FOREST	2.6	191916E	RIPARIAN
30713007S	0014	UROUIDES JOSEPHINE P	1	VACANT	CORONADO FOREST	2.6	191916E	MULTI USE
30713015F	0014	GILLESPIE CYNTHIA JOAN REVOC TR	40	VACANT	CORONADO FOREST	3.5	271916E	MULTI USE
30713015R	0014	HABER KAI TR	20	VACANT	CORONADO FOREST	3.8	271916E	MULTI USE
30714002S	0004	KOSTROSKI FAMILY LIMITED PARTNERSHIP	25	VACANT	CORONADO FOREST	1.3	091916E	MULTI USE
30714002U	0014	HOOPER GROUP INC	8	VACANT	CORONADO FOREST	0.6	091916E	RIPARIAN
30714002X	0014	WICKS FRANKLIN R & CONSTANCE J	8	VACANT	CORONADO FOREST	1.3	091916E	MULTI USE
30714002Z	0014	BURROWS RICHARD L & KAREN JT/RS	12	VACANT	CORONADO FOREST	1.2	091916E	MULTI USE
30714003C	0014	LAUDERBACH DENNIS G & GAIL A CP/RS	2	VACANT	CORONADO FOREST	0.6	091916E	RIPARIAN
30715001E	0004	BLUE OAKS CORP	13	VACANT	CORONADO FOREST	1.7	101916E	MULTI USE
30716001B	4710	BARCHAS SARAH ELIZABETH	72	RANCHING	CORONADO FOREST	2.3	151916E	MULTI USE
30716001B	4710	BARCHAS SARAH ELIZABETH	51	RANCHING	CORONADO FOREST	2.3	151916E	MULTI USE
30716001B	4710	BARCHAS SARAH ELIZABETH	47	RANCHING	CORONADO FOREST	2.4	151916E	MULTI USE
30716001C	4717	BARCHAS SARAH	35	RANCHING	CORONADO FOREST	2.1	151916E	RIPARIAN
30716001C	4717	BARCHAS SARAH	1	RANCHING	CORONADO FOREST	2.2	151916E	MULTI USE
30716013B	0004	ARCHAEOLOGICAL CONSERVANCY (THE)	1	VACANT	CORONADO FOREST	3.0	151916E	MULTI USE
30716013C	0004	ARCHAEOLOGICAL CONSERVANCY (THE)	1	VACANT	CORONADO FOREST	2.9	151916E	MULTI USE

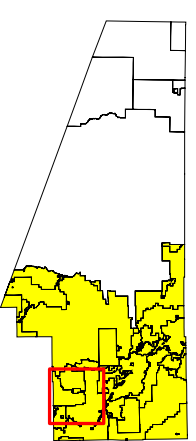
POSSIBLE COMPENSATORY MITIGATION PARCELS IN RE: ROSEMONT MINE

PARCEL	USE	PARCEL OWNER	ACRES	DESCRIPTION	LOCATION	DISTANCE TO MINE (MILES)	TRS	CLS
30716013D	4710	BARCHAS SARAH ELIZABETH	1	RANCHING	CORONADO FOREST	3.0	151916E	MULTI USE
30716013D	4710	BARCHAS SARAH ELIZABETH	72	RANCHING	CORONADO FOREST	2.7	151916E	MULTI USE
30717001G	4710	ROSEMONT COPPER COMPANY	36	ROSEMONT	ROSEMONT PARCELS	1.7	161916E	MULTI USE
30717001K	4710	ROSEMONT COPPER COMPANY	2	ROSEMONT	ROSEMONT PARCELS	2.0	161916E	MULTI USE
30717001K	4710	ROSEMONT COPPER COMPANY	5	ROSEMONT	ROSEMONT PARCELS	2.1	161916E	MULTI USE
30717001N	4710	ROSEMONT COPPER COMPANY	2	ROSEMONT	ROSEMONT PARCELS	2.0	161916E	MULTI USE
30717001V	0014	PRUETT BARBARA H & H WAYNE TR	1	VACANT	CORONADO FOREST	2.4	161916E	MULTI USE
30717501K	6800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.1	161916E	MULTI USE
30717501N	6800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.0	161916E	MULTI USE
30718003D	4710	ROSEMONT COPPER COMPANY	5	ROSEMONT	ROSEMONT PARCELS	2.0	171916E	MULTI USE
30718003D	4710	ROSEMONT COPPER COMPANY	3	ROSEMONT	ROSEMONT PARCELS	2.0	171916E	MULTI USE
30718503D	6800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.0	171916E	MULTI USE
30720001F	0004	SAN LAZARO LTD PARTNERSHIP	20	VACANT	CORONADO FOREST	2.4	211916E	MULTI USE
30720002E	0014	DUMBAULD JAMES L & BYRON JESSICA E TR	10	VACANT	CORONADO FOREST	2.6	211916E	MULTI USE
30720002J	0014	BURLESON BRADY W & VALERIE L CP/RS	4	VACANT	CORONADO FOREST	2.6	211916E	MULTI USE
30720003D	4710	ROSEMONT COPPER COMPANY	53	ROSEMONT	ROSEMONT PARCELS	2.1	211916E	MULTI USE
30720003F	8800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.2	211916E	MULTI USE
30720503D	6800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.3	211916E	MULTI USE
30720503F	6800	ROSEMONT COPPER COMPANY	0	ROSEMONT	CORONADO FOREST	2.2	211916E	MULTI USE
30721002J	0004	GOTTESMAN STACY M & MATTHEW J	5	VACANT	CORONADO FOREST	3.0	221916E	MULTI USE
30721002P	0004	SENG ALBERT F & REBECCA ELLEN CP/RS	6	VACANT	CORONADO FOREST	2.6	151916E	MULTI USE
30721002Q	0004	CONOVER PATRICK & MELISSA CP/RS	6	VACANT	CORONADO FOREST	2.6	151916E	MULTI USE
30721004A	0014	HOLLMAN GREG & MARTINEZ JOEY A JT/RS	10	VACANT	CORONADO FOREST	2.7	221916E	MULTI USE
30721004D	0014	ACHILLES PRESTON Y & NANCY J TR	10	VACANT	CORONADO FOREST	2.8	221916E	MULTI USE
30721004G	0014	STEEP LAWRENCE MILTON & VICKI SUE JT/RS	10	VACANT	CORONADO FOREST	2.8	221916E	MULTI USE
30721004J	0014	LORENTSEN ROBERT N & NANCY B CP/RS	10	VACANT	CORONADO FOREST	2.9	221916E	MULTI USE
30721004M	0014	GRAY LYNETTE P	10	VACANT	CORONADO FOREST	2.9	221916E	MULTI USE
30721004N	0014	GRAY LYNETTE P	10	VACANT	CORONADO FOREST	2.9	221916E	MULTI USE
30721006F	0014	ALLSMAN AXELROD LIVING TR	36	VACANT	CORONADO FOREST	3.4	221916E	MULTI USE
30721006K	0004	DOWNING DOUGLAS J REVOCABLE LIVING TR	36	VACANT	CORONADO FOREST	3.8	221916E	MULTI USE
30721006N	0004	WILLIAMSON KENNETH E & GEORGIA D CP/RS	15	VACANT	CORONADO FOREST	3.7	221916E	MULTI USE
30721006P	0014	LEE YONG-JOO & YOUNG-RAN CP/R	36	VACANT	CORONADO FOREST	3.7	221916E	MULTI USE
30721006S	4710	BARCHAS FAMILY LLC	37	RANCHING	CORONADO FOREST	3.2	221916E	MULTI USE
30721007B	0004	ARCHAEOLOGICAL CONSERVANCY (THE)	1	VACANT	CORONADO FOREST	3.1	221916E	MULTI USE
30721007D	0014	FELTMAN STEPHEN & RHONDA LIVING TR	1	VACANT	CORONADO FOREST	3.1	221916E	MULTI USE
30721007J	0011	TAYLOR BRADLEY E & NANCY J CP/RS	36	VACANT	CORONADO FOREST	3.2	221916E	MULTI USE
30721007K	4710	BARCHAS FAMILY LLC	72	RANCHING	CORONADO FOREST	3.0	221916E	MULTI USE
30721007M	0014	CHIN JAE MAN & CHRISTINA YOO CP/RS	18	VACANT	CORONADO FOREST	3.1	221916E	MULTI USE
30721007N	0013	LIEBERTHAL DAVID H & BOWER CYNTHIA E CP/RS	36	VACANT	CORONADO FOREST	2.9	221916E	MULTI USE
30721007P	0014	MARRS CHRISTOHER DEAN & JOAN	36	VACANT	CORONADO FOREST	3.1	221916E	MULTI USE

ATTACHMENT 3

ROSEMONT MITIGATION PARCELS

-  ROSEMONT MINE
-  RANCHING
-  ROSEMONT
-  STATE LANDS
-  VACANT
-  Major Street
-  State Highway
-  Interstate Highway
-  Administrative Boundaries



Pima County Index Map
Index Map Scale 1:1,500,000

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Scale 1:40,000

