



## COUNTY ADMINISTRATOR'S OFFICE

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C. H. HUCKELBERRY  
County Administrator

### Pima County Position on the Proposed Rosemont Mine in Pima County, Arizona

July 10, 2009

The Pima County Board of Supervisors has, on numerous occasions, passed resolutions expressing their concern and opposition to any mining activity in the Santa Rita Mountains, including the proposed Rosemont Mine. The County has expressed concerns over the basis of the Rosemont mining activity, including the validity of mining claims filed on federal lands that are now being planned for the placement of waste material, meaning that the valuable mineral upon which the original claim was based is not even considered for recovery. The County continues to believe that many of the original mining claims are invalid and a more detailed validity analysis will confirm that the original basis of these claims is invalid.

The County has also expressed considerable concern over the adverse environmental impacts associated with the proposed mine. Numerous well-documented studies introduced as testimony in hearings before Congress regarding hard rock mining clearly indicate that past environmental studies have seriously and consistently under-estimated adverse environmental impacts, as well as the cost associated with clean-up and/or mitigation of contamination or environmental harm. The measures proposed by Rosemont in their mining plan of operation are clearly inadequate to offset these adverse impacts.

In addition, the federal Environmental Impact Statement required to measure the balance between benefit and harm is fundamentally flawed as there is no consideration being given by the Forest Service or Department of Agriculture to the "no action" alternative. This simply means that the federally authorized Impact Statement as required through the National Environmental Policy Act is a sham where the full range of alternatives cannot be considered. Congress needs to act and the Executive Branch needs to direct, through Administrative Order, that the true intent of the National Environmental Policy Act must be followed. Requiring that the "no action" alternative must be considered is the only correct public policy.

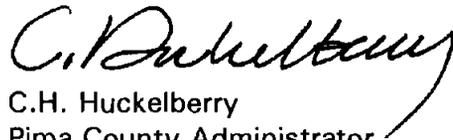
Finally, Rosemont has continually stated through its public statements that it is a "new mine" and will introduce a "new way" of mining. While these statements are designed to sway public opinion favorably toward the Rosemont position, they are meaningless since there has been no commitment to "no net loss of natural land forms and resources." While there has been some discussion regarding preservation, there has been no discussion regarding restoration. A true "no net loss" would require Rosemont to mitigate and restore to their

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original condition, previously mined lands within Pima County to a pre-mining state or natural condition. There is and continues to be a very large and significant difference between mitigation and restoration. Only restoration of an equivalent land use size and natural resource base of a presently degraded mining site should be considered as meeting the goal of "no net loss of natural resource base" as is often discussed in contemporary federal environmental policy commitments.

I would appreciate your considering the position of Pima County regarding the proposed Rosemont Mine.

Respectfully submitted,



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