September 15, 2009

Bruce Ellis, Chief
Environmental Resource Management Division
U.S. Bureau of Reclamation
6150 West Thunderbird Road
Glendale, Arizona 85306-4001

Jeanine Derby, Forest Supervisor
U.S. Forest Service
300 West Congress
Tucson, Arizona 85701

Re: Environmental Effects Analysis for Recovery of CAP

Dear Mr. Ellis and Ms. Derby:

You are the responsible authorities for two federal investigations that would not exist but for the proposed Rosemont Copper mine.

This letter is regarding the analysis of effects of recovering water being recharged on behalf of the Rosemont mine. As you know, Rosemont Copper has been buying water from the Central Arizona Project (CAP) and recharging this at the Lower Santa Cruz Replenishment Project site in Marana. This activity is part of the proposed mining plan of operations submitted by Rosemont to the U.S. Forest Service, and generates what are called storage credits.

The accrued storage credits could be recovered anywhere in the Tucson Active Management Area. So far as I know, the effects of CAP recovery (pumping) are not currently being evaluated by either of your agencies. Is that correct?

Effects could be considerable, depending on whether Rosemont sells the storage credits for urban development, recovers the credits at the mine’s proposed wellfields, recovers the credits at the Green Valley recharge site, or designates the credits as being non-recoverable.
Which agency will be responsible for considering the effects of recovering CAP credits?

Sincerely,

C. H. Huckelberry
County Administrator

CHH/dr

c: The Honorable Gabrielle Giffords, Member, United States House of Representatives
The Honorable Raúl M. Grijalva, Member, United States House of Representatives