



THE UNIVERSITY OF ARIZONA
COOPERATIVE EXTENSION

Natural Resource Users Law & Policy Center

A collaboration between the
James E. Rogers College of Law and
the College of Agriculture & Life Sciences

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Resolution DEIS Comment
P.O. Box 34468
Phoenix, AZ 85067-4468

Dear Sir or Madam:

The Center for Natural Resource Users Law and Policy Center with the University of Arizona is dedicated to helping the public in Arizona to make use of the natural resources in the state in a sustainable manner that avoids, to a high degree, and mitigates harm to other interests and values represented in a project area. Within this framework, we offer the following conditional support regarding the proposed Resolution Copper Mine near Superior, Arizona.

Copper is an essential element for the manufacturing and construction industries and continues to make an important contribution to economic activity in Arizona. In 2018, Arizona was the leading copper-producing State in the country and was responsible for about 66% of domestic output, out of an estimated total of \$8 billion. Copper and copper alloy products were used in building construction, 44%; transportation equipment, 20%; electrical and electronic products, 19%; consumer and general products, 11%; and industrial machinery and equipment, 6%.¹

The proposed Rosemont mine will have a direct positive impact on employment and economic activity in the Superior, Arizona area and for the State generally. The Draft EIS states:

- On average, the mine is projected to directly employ 1,500 workers, pay about \$134 million per year in total employee compensation, and purchase about \$546 million per year in goods and services. Including direct and multiplier effects, the proposed mine is projected to increase average annual economic value added in Arizona by about \$1 billion.
- The proposed mine is projected to generate an average of between \$88 and \$113 million per year in State and local tax revenues.

On the negative side of the ledger, “[c]onstruction and operations of the proposed mine could affect costs for both the Town of Superior and Pinal County to maintain street and road networks.” Additionally, no dollar amount is attached to the DEIS disclosure that “[t]here would be a reduction in available allotment acreage ranging from 7,500 to 16,000 acres and a proportional reduction in livestock capacity from 1,300 to 5,300 animal-unit months. The water sources and grazing infrastructure associated with these allotment areas would also be lost.” Also, no mention is made of the multiplier effects of this loss. Still, on balance, the project will likely have a strong positive economic impact for the State.

The Center’s support for the project is conditional because of the strong adverse impacts the project will have on tribal, grazing, and environmental values in the area. The DEIS explains that the project has a “high potential for the proposed mine to directly, adversely, and permanently affect numerous cultural artifacts, sacred seeps and springs, traditional ceremonial areas, resource gathering localities, burial

¹ U.S. Geological Survey, “Mineral Commodity Summaries, 2019”.



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locations, and other places and experiences of high spiritual and other value to tribal members.” The Center urges both the Forest Service and the project proponent to avoid adverse impacts to legitimate tribal values if at all possible. Our support for the project is conditioned on our belief that this effort will be made. If the adverse impacts cannot be avoided, they should be mitigated to the greatest extent possible.

With respect to grazing, the DEIS indicates that there will be a significant loss of grazing acres and AUMs as a result of the proposed project. Livestock production in Arizona means ranching on public rangelands. The kind of reduction the proposed project will cause is a significant diminishment of livestock production in the State and further harms the ancillary commercial activity that is dependent on a vibrant livestock industry. We are concerned that the Forest Service not approve these kinds of actions without making a concerted effort to find alternative, timely, economically viable livestock grazing alternatives for the ranchers who want them. Our support for the project is conditioned on the Forest Service making this effort.

The DEIS also makes clear the proposed project will cause significant adverse impacts on the land and water and wildlife impacts in the project area. Again, the Center urges both the Forest Service and the project proponent to avoid adverse impacts to resource values if at all possible. Our support for the project is conditioned on our belief that this effort will be made. If the adverse impacts cannot be avoided, they should be mitigated to the greatest extent possible.

Thank you for taking our view into consideration.

Sincerely,

George Ruyle, Center Co-Director

Jeff Eisenberg, Center Consultant