

Janet Napolitano
Governor

ARIZONA STATE  LAND DEPARTMENT

Mark Winkleman
State Land
Commissioner

July 14, 2008

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

Re: **Rosemont Copper Project EIS**

Dear Ms. Derby:

At this stage of the Environmental Impact Statement (EIS) process, the Arizona State Land Department (Department) is primarily concerned that the Forest Service institutes all available public information and participation procedures as soon as possible. For instance, the Department would have preferred if the Forest Service had already designated at least some Cooperating Agencies, consistent with Council on Environmental Quality regulations which advocate the participation of Cooperating Agencies "at the earliest possible time." The Department strongly recommends that the Forest Service designate Cooperating Agencies to contribute to the evaluation of the public comments already presented and to the determination of the final scope of the EIS, with the understanding that the Forest Service retains final responsibility for this determination.

Opening the EIS process to the direct participation and assistance of State and local representatives will also allow for the comprehensive collection and evaluation of information relative to what needs to happen prior to the initiation and ultimate operation of the proposed project. To date, the available information has been sporadic, for instance, with respect to the off-site infrastructure and resources needed to support the project. This lack of material information has hindered the ability of the public and State and local governments to evaluate accurately the impact of the project on Tucson residents and business.

The Department holds in trust, for the benefit of public schools and other state institutions, hundreds of thousands of acres of land in the vicinity of the proposed Rosemont project. As noted in the Forest Services' Notice, some of that land may be needed for infrastructure to support the proposed project should it receive approval. At the same time, a significant amount of that land to the north and west of the proposed project is being planned for future, near- and long-term development. Because of the proposed project's proximity to existing urban development (and even greater proximity to future urban development), the environmental and social impacts of the mine are intertwined with a broad variety of issues. These impacts will evolve and require evaluation of not only existing conditions, but also future growth. The impact

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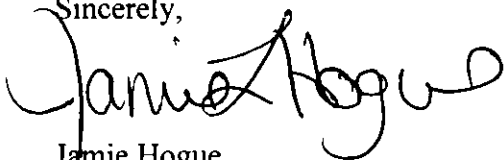
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of the proposed project on water resources within the Tucson Active Management Area is only the most obvious example.

Ultimately with respect to the Rosemont project, the accomplishment of the Department's mission and the safeguarding of the value of the land held in trust depend on decisions that strike the best balance for the community. To achieve that balance in the Environmental Impact Statement process, the Department believes that a fully-informed and fully-open process will result in the appropriate decisions regarding the proposed Rosemont project, and any alternatives and mitigation methods which may be adopted. In this manner, the residents of Pima County can have the fullest possible confidence regarding the future of the proposed project.

Sincerely,

A handwritten signature in black ink that reads "Jamie Hogue". The signature is written in a cursive style with a large, looping initial "J".

Jamie Hogue
Deputy Commissioner