NEW MEXICO
BUSINESS COALITION

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February 19, 2016

BLM Las Cruces District Office
Attention: Doug Haywood
1800 Marquess Street
Las Cruces, NM 88005

RE: **Support for Copper Flat Mine**

Dear Mr. Haywood:

On behalf of the New Mexico Business Coalition, please allow me the opportunity to provide written comments on the Copper Flat Copper Mine Draft Environmental Impact Statement (EIS). The document is clearly drawing from years of data collection and analyses and supports the conclusion that Copper Flat would indeed be operated in a manner that prevents unnecessary degradation of public lands. The Draft EIS demonstrates that the proposed mine development would operate within strict environmental regulations to protect human health and the environment, bring very good job opportunities and tax revenue to New Mexico, result in the reclamation of a former mine site, and produce valuable metals domestically. For all of these reasons we urge the BLM to move forward without delay in issuing the final EIS and rendering a decision to allow New Mexico Copper Corporation to operate their preferred alternative.

As New Mexico residents, we know the value of water and the importance of protecting the natural environment. We are pleased that Copper Flat would employ a number of best management practices to limit the amount of water needed and operate the mine on over 70% recycled water. Copper Flat's design includes a number of steps to protect water quality and guard against accidental spills including a fully lined tailings facility, managed storm water, and commitment to abide by the New Mexico Environment Department's strict rules to protect and monitor ground water. As the Draft EIS notes, pumping of New Mexico Copper's production wells will not adversely impact the wells in Hillsboro or any identified wells along Animas Creek or near the production wells, nor will it negatively impact Las Animas Creek or Percha Creek flows or vegetation along these streams.

As business owners, we know how important good jobs are for families and communities as well as how a ripple effect from one successful business can positively impact many others. The preferred alternative mine plan will directly employ 270 workers at Copper Flat in Sierra County and pay annual wages of $35,000-$60,000 plus benefits.

These wages will provide solid income and stability for workers and their families, as well as boosting the local economy as workers spend their earnings. Job training programs that will occur as a result of this project will provide lifetime skill sets (and years of gainful employment) for many of the local residents. As your Draft EIS notes, "Jobs and income are strongly associated with a number of beneficial health outcomes such as an increase in life expectancy, improved child health status, improved mental health, and reduced rates of chronic and acute disease morbidity and mortality" (pg 3-280). The operation of Copper Flat will help our citizens lift themselves and their families out of cycles of poverty and contribute to a healthy business environment in New Mexico.

As informed citizens, we know that New Mexico would greatly benefit from additional revenues through taxes generated by the operation of Copper Flat. The project would benefit Sierra County and the State through payments of the Copper Ad Valorem Tax, Severance Tax, and Processors Tax which will generate an estimated $18-22 million according to the Draft EIS. In addition, the project will boost Income Tax, Property Tax, and Gross Receipts Tax, all of which can be applied at state and local levels to alleviate budget shortfalls and improve services and infrastructure for New Mexico residents.

As our membership includes avid hikers, bikers, boaters, and proponents for the protection and enjoyment of the outdoors, we are happy to note that Copper Flat will not significantly impact recreation and that the mine will be reclaimed according to strict standards at the end of mining. The reclamation of Copper Flat will leave the area in a better condition than it is now and provide habitat for wildlife including bats, reptiles, small and large mammals and many birds including raptors. Requirements for reclamation have become more stringent over the years and will ensure the area is safe and stable without perpetual care after mining ceases. Since New Mexico Copper Corporation will post a financial assurance bond (expected to be over $45 million) that will be calculated to cover the cost of reclamation in the event that the company fails, tax payers won't get stuck with the "cost of cleanup" at the end of mine operations.

As global citizens, we support the safe and environmentally sound mining of valuable metals here in the United States. Copper Flat will provide some of the world's needed supply of valuable metals that are capable of near infinite recycling, a benefit today and into the future. We know that many other countries do not have the worker safety or environmental protection laws that we do. Copper is used in many important industries and products, including power transmission and generation, transportation, electronic products, wiring and plumbing, and more. For all the reasons stated, we would like to see development of these resources in the United States.

In conclusion, we have reviewed the Draft EIS and believe it is complete and accurate. The assessments are clear and relevant to the proposed mining operation; they are well supported with significant and sufficient data and expert studies relevant to the specific impacts this proposed project would have on lands, air, waters, wildlife and communities.

The Draft EIS demonstrates that Copper Flat would be operated in a manner that prevents unnecessary degradation of public lands and fits within BLM's multi-use mandate for the management of public lands. We congratulate the BLM on a well-researched and detailed report and ask that you and the other cooperating agencies proceed without delay to complete the Final EIS and issue a Record of Decision permitting the environmentally responsible and lawful operation of Copper Flat Mine.

Respectfully,

Carla J. Sonntag
President