

April 1, 2016

BLM Las Cruces District Office
1800 Marquess Street
Las Cruces NM 88005

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Comments Regarding the Copper Flat Copper Mine DEIS

I am a property owner with water rights on **Ex 6** I chose to live here because it has water, huge sycamores, abundant birds and wildlife drawn to its riparian habitat, and a clear night sky. The proposed Copper Flat Mine threatens all of these values.

I am concerned about the broader impacts of the proposed mine on our county, including health, safety, the economy and the environment.

NEPA requires an environmental analysis with public disclosure. The Copper Flat DEIS fails to do an adequate job of either. The preferred alternative does not meet BLM's stated purpose "to best meet the present and future needs of the American people in a balanced manner, and to take into account the long-term sustainability of other resources and resource uses."

In terms of public disclosure, BLM certainly made this document as confusing as possible. BLM is supporting the current operating plan proposed by THEMAC. It should be stated as the proposed action, not Alternative 2. By focusing on a proposed action that is no longer proposed, the entire document downplays and/or obscures actual impacts.

NEPA requires a range of reasonable alternatives; offering two out-of-date THEMAC operating plans and their current one does not offer a "range", and the consideration of the no action alternative given by the BLM is completely inadequate.

As stated in my scoping comments, estimates of impacts to clean water, clean air, wildlife habitat, and public health need to be based on **actual records** of similar operations. Throughout the DEIS BLM makes unsubstantiated and/or undocumented assumptions, which downplay actual impacts. The DEIS also assumes that untested technology will reduce impacts and thus fails to do an adequate assessment. Some specific comments follow.

Water Impacts

The proposed action and preferred alternative are water mining. The DEIS uses an outdated and scientifically criticized method to determine the recharge of aquifers. Recharge potential is much less using realistic methodology, so the

impacts of surface and ground water are much more significant than claimed in the DEIS.

In recent years, the snowpack in the Black Range has been decreasing. This trend will continue due to the impacts of climate change. The DEIS fails to adequately assess the effects of climate change.

BLM claims a shallow clay layer isolates the effects of the mine's pumping of the Santa Fe Aquifer. It is not possible to make this claim based on a **conceptual model** produced by hired guns, with very limited data points. The **imaginative** cross section shown in figure 3-10 is just one possibility; the clay "bed" could be clay lenses.

In addition, even if the conceptual model is correct, lowering the aquifer will effect pressure and in turn permeability.

The DEIS needs to include how potential dewatering can impact the vegetation, wildlife, and economy of Animas Creek, including the reduced tax base from declining property values.

Volume 1 of the DEIS does not show all of the actual water declines in figure 3-16b - it only goes to 60 feet; the actual projections in Appendix F also show deficits at 70 and 80 feet. This seems like a deliberate effort to mislead the public. In addition, a figure overlapping the declines resulting from increased pumping (figure 3-19c) with an accurate figure 3-16b would be useful.

Groundwater will continue to flow in the pit lake forever with the DEIS estimate of 38 and 39 acre-feet per year - more than 12 million gallons -- for the proposal. The rate is presumably greater for the preferred alternative. This will increase groundwater depletion.

Air and Water Pollution

The DEIS does not provide a dispersion model for the preferred alternative and does not address impacts of fugitive dust.

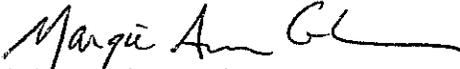
As noted in the DEIS, pollutant dispersal would be reduced through best management practices (BMPs) for dust suppression. The DEIS fails to address what will happen on dry windy days and during extreme wind events. Pollutants dispersed during such events could be deposited in soils miles from the mine site, and re-circulated whenever the wind blows, resulting in air and water pollution and contamination of soils.

Smaller dust particles not only travel farther, they can get deeper into lungs and cause more health problems.

These are just a few of the many problems with the Copper Flat DEIS; the entire document is flawed. The overall tone of the DEIS brought to mind Alfred E. Neuman - "What, me worry?"

I oppose any mining at Copper Flat.

Sincerely,



Margie Ann Gibson

Ex 6

Cc: Senator Tom Udall