

TO: Regional Forester/Deputy Regional Forester
USFS Southwestern Region
333 Broadway SE
Albuquerque, NM 87102

REC'D USDA

JAN 27 2014

REGIONAL FORESTER'S OFFICE
SOUTHWESTERN REGION

FROM: William S. Maki
2785 East Posse Court
Green Valley, AZ 85614
520-232-3117
wsmaki@gmail.com

Signed:



DATE: 23 January, 2014

RE: Formal Objection to Final Impact Statement & Draft Record of Decision
for the Rosemont copper Project: A Proposed Mining Operation, Coronado National Forest.
Responsible Official – Jim Upchurch, Forest Supervisor
Issue: Traffic on SR83 and increased accidents and fatalities

Rosemont intends to ship its products, to receive supplies, and to transport its workers by vehicles on Scenic Route 83. The increase in traffic will be huge. In testimony (24544_DEIS_3170) I noted that: "Including the morning and evening shift changes, the increase in traffic is over 2,000 new vehicles each week or, by Rosemont's own estimate, a minimum of 300 new vehicles each day."

One of the consequences projected in the DEIS was an increase in traffic accidents and fatalities: "... the [Draft] EIS projects an accident rate increasing from 30 per year to 60 to 107 per year. Fatalities are projected to increase from one to three -- from one every three years to one to two in each year. In short, accidents and fatalities along SR 83 will double or triple. A conservative estimate is 20 to 40 deaths caused by mine-related traffic during the life of the mine."

The Forest Service responded in this way: "An increase in traffic due to population growth and mine related traffic would increase the potential for traffic accidents, including accidents with fatalities, to occur on SR 83. It is important to understand that traffic accidents and fatalities are the result of numerous variables that cannot be predicted with any certainty." (Executive Summary, p. xxxvi).

The Forest Service's response in the FEIS downplays its own original reporting in the DEIS. The fact remains that there will be a cost to building and operating Rosemont, a cost measured in loss of human life.

The Forest Service has NOT responded adequately to my objections concerning the traffic accident and fatality impact.

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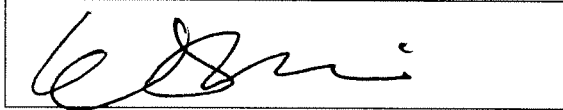
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Issue: Groundwater pumping and inadequate recharge plan

In 24544_DEIS_23446, I observed that: "Among other damage, the mine will pump groundwater that is in short supply." Nothing has changed in the FEIS (Executive Summary, p. xxix). FEIS notes that: "Rosemont Copper has committed to recharging available Central Arizona Project water to offset pumping." Recent analyses indicate that the available water from the Colorado River is diminishing due to prolonged and continuing drought conditions in the West, and that Arizona's access to CAP water is at risk (References 1 and 2 below).

In the FEIS (Volume 2, p. 360), the Forest Service concurs:
"To date, Rosemont Copper has purchased and recharged excess Central Arizona Project water. Public concern has been raised that with shortages likely on the Colorado River over the next few decades, Rosemont Copper would be unable to meet recharge obligations due to the unavailability of excess water. Indeed, recent work conducted by the U.S. Bureau of Reclamation confirms that the Colorado River Basin faces a range of future imbalances between water supply and water demand, although there are many opportunities and actions that could be taken to reduce potential shortages (U.S. Bureau of Reclamation 2012)."

Thus, whether Rosemont can make good on its commitment to recharge using CAP water over the life of the mine (at least) is uncertain (at best). To have Rosemont pumping residential water and offsetting that loss with water of a lesser quality and uncertain quantity is a poor bargain for the citizens of Arizona. The only way to mitigate this impact is to have Rosemont, should the mine be built, use CAP water and to suspend pumping of groundwater.

The Forest Service, in the FEIS, has NOT responded adequately to my objections concerning depletion of groundwater.

References:

(1)<http://www.washingtonpost.com/blogs/govbeat/wp/2014/01/17/brown-to-declare-california-drought-emergency-as-western-water-woes-intensify/>

(2)<http://www.nytimes.com/2014/01/06/us/colorado-river-drought-forces-a-painful-reckoning-for-states.html?ref=us>