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REGIONAL FORESTER'S OFFICE
SOUTHWESTERN REGION

January 21, 2014

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

RE: Formal objection to Final Impact Statement & Draft Record of Decision for the Rosemont Mine copper project: A Proposed Mining Operation, Coronado National Forest.

Dear Sir

When I spoke at one of the DEIS public hearings in late 2011, my objections to the transportation section of the DEIS were threefold:

- Despite heavy mine related truck traffic on SR 83, mitigation was limited to car pools and construction of school bus pullouts.
- There was absolutely NO supporting data on the remainder of the transportation route being considered at that time (SR 83 to I-10 to Port of Tucson rail yard, then by rail through Green Valley, AZ to the Port of Nogales).
- Failure on the part of Rosemont Copper to outline their business plan regarding transportation of product from the mine to the smelter.

While carpooling and school bus pullouts on SR 83 were more formally addressed in the FEIS there are indications that Rosemont has abandoned the original transportation route in favor of a totally new route that includes a myriad of State highways leading to the Ports of Douglas, Naco, or Nogales. There is no data detailing mitigation plans on these state highways other than SR 83! This apparently confirms the fact that Rosemont Copper's transportation plans for shipping copper concentrate and copper cathodes is still in a state of flux.

In the Executive Summary (page xxxvi) it states "in year 1 of the active mining phase, mine related traffic would include 28 materials/equipment shipments PER DAY, 56 copper concentrate shipments PER DAY and 4 copper cathode deliveries PER DAY, which totals 88 HEAVY truck shipments/deliveries PER DAY or 3.7 shipments PER HOUR based on 24 hours of operation. So, we are still looking at one truck shipment or delivery every 15 minutes. If the hours of operation change then the hourly numbers increase. These figures exclude weekend mine related traffic and daily round trip bus traffic to transport workers. I found no reference to specific hours of operation or the size and weight of the "heavy haul trucks.

Despite all the heavy truck traffic, ADOT (on page 3 of the Record of Decision) would only require “3 inches of asphalt-concrete pavement overlay on the existing 2 lanes of SR 83 from I-10 to the mine entrance and expanded turn lanes at the mine entrance off SR 83. Apparently Rosemont has agreed to pay a lump sum for part of the work. The questions are: What’s the total cost? What’s Rosemont’s “lump sum” share? Why are the mitigation plans limited to SR 83? Given the volume of mine related traffic the mitigation plan appears inadequate.

Some 20 months ago I remember hearing about ADOT’s attempt to seek approval of a multi-million dollar project to rebuild and expand SR 83 to four lanes. The reason stated by ADOT was that long term population growth in Sonoita was projected at around 50,000 people!! In reality, ADOT probably felt this was what was needed to support Rosemont Mine! No doubt this proposal came from Rosemont to begin with!

The FEIS states that ADOT “has exclusive jurisdiction over all state highways being considered” yet I could find no indication that mitigation measures on State highways, other than SR 83, had been included.

ADOT also indicates: “Anticipated increase in traffic would increase the level of service on SR 83 but not below unacceptable levels”. However the potential for “traffic accidents including accidents with fatalities would occur on SR 83”. Also, “the risk of accidental releases of hazardous materials cannot be entirely prevented”. There is “increased risk of wildfire spread from “ transportation of flammable materials” and “noise from blasting and equipment operation will likely decrease the recreation value and property values in the area”!

In summary, I think it incumbent upon ADOT to rethink mitigation plans for SR 83 with a focus on safety, as well as providing the Forest Service with a detailed mitigation plan for ALL the State highways being considered, complete with total cost and how much Rosemont will commit to pay.

It doesn’t make sense that SR 83, a scenic, winding, 2-lane highway could safely accommodate the projected high levels of mine related traffic simply by repaving the existing roadway and adding turn lanes at the mine entrance.

In addition, prior to approval, Rosemont should be required to provide a detailed business plan showing specific transportation routes involved in shipping product from the mine to the smelter. You would think that shipping the ore would be as important as mining it. I find it difficult to understand why this important aspect apparently remains in a state of flux and the Forest Service hasn’t asked for specifics.

Lastly, given Rosemont's questionable financial status, the Forest Service has an obligation to insure adequate protection in the event of bankruptcy or sale of assets to another company.

Sincerely,

David E. Babson

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