

706 E. Bent Branch Place

Green Valley, AZ 85614

February 3, 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, Nogales District, James Upchurch, Supervisor.

Dear Regional Forester

During the DEIS process, I responded with comments on several issues, including the serious risk of over draft on our upper Santa Cruz aquifer and the likelihood of increasing the subsidence problem already known to exist in the Sahuarita and Green Valley areas. (reference comment letter number 10946). We already have an overdraft situation here and the drawdown of the quantities of our ground water, estimated to be 6,000 acre feet per year, but with no upper limits, is a very serious concern to all of us who live in this area.

In chapter three of the FEIS the problem of subsidence is acknowledged as is the drawdown of potable water from our aquifer on the west side of the Santa Ritas. There are no restrictions on the amount of water that Rosemont could use. This is unacceptable when agriculture and other users are trying hard to reduce water draw down because we know we are facing a prolonged draught situation all over the desert southwest.

In the sections on mitigation the proposed plan to allow Rosemont to enter into a contract with Community Water Company of Green Valley to build a CAP pipeline extension from the Pima Mine Road terminus and to acquire credits to recharge is ludicrous in concept and without any guarantees. At the present time there are no approved recharge sites and there are not enough uncommitted CAP allocations to balance out the over-draw from the proposed replacement. In addition there is no guarantee that CAP water will be flowing without restriction and cutbacks, as the CAP is concerned about the levels of Colorado River water in Lake Meade and Lake Powell. In an October 2, 2013 presentation to the Environmental Committee of the Green Valley Council, Mr. Mitch Basefsky, communication representative for the CAP indicated that the 24 Month Colorado Basin Study projects a 9% reduction from Lake Powell into Lake Meade for each of the years 2014 and 2015. He explained that this level of decline could trigger a Declaration of Lower Basin Shortage by the Secretary of the Interior for 2016. He indicated that there are no excess water allocations available for purchase. In addition in a recent New York Times article by Nagourney and Lovett, *Severe Draught Has U.S. West Fearing Worst*

(Feb. 1, 2014), California is expected to have the worst draught in 500 years. Secretary Tom Vilsack comments that this is of “grave concern for the entire west”.

Therefor the proposed mitigation plan to re-charge our local aquifer is clearly a theory without substance. It is mostly a PR stunt by Rosemont. The plan is unacceptable. The potential for damage to area home property values and wells from the Rosemont project are severe and costly. In fact already, during a test pumping of one of the new Rosemont wells in Sahuarita, the well of the adjacent property owner stopped pumping the next day after the test. This necessitated major repairs and extension of the well several hundred feet further down. Imagine the effect across the area if they were operating 24 hrs.every day!

There is no excuse for putting the quantity and the quality of our ground water and the property values of homeowners at risk with this grossly inadequate mitigation.

Thomas F. Purdon, MD

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