

Feb. 11, 2014

14174 N. 90th Place
Scottsdale, AZ 85260

Reviewing Officer

USFS Southwest Region

333 Broadway SE

Albuquerque, NM 87102

RE: Formal Objection to Final Impact Statement and Draft Record of Decision for the Rosemont Copper Project: A Proposed Copper Mining Operation, Coronado National Forest.

Responsible Official: Jim Upchurch, Forrest Supervisor.

National Forest, Ranger District - Coronado National Forest, Nogales Ranger District

Mr. Upchurch,

The purpose of this letter is to object to the USFS Southwest Region FEIS on the proposed Rosemont Copper Company Mine in the Santa Rita Mountains south of Tucson. I oppose the proposed Rosemont Copper Company mine in the Santa Rita Mountains. I'm disappointed that the USFS has failed to consider, or adequately address critical environmental, safety and water resource issues. Additionally the USFS has not addressed the destruction of Tribal Nation cultural landscapes in the Santa Rita Mountains.

My principal objection with regard to the USFS FEIS concerns the high probability of air pollution, soil and ground water contamination. Rosemount Copper has publically stated in press releases their development plans, which include their desire to expand the foot print of the mine in order to rapidly maximize the output of the mine with little regard to the environment.

The USFS has inadequately addressed the protection of critical water resources and the risk factors associated with water contamination from an open pit mine. For example, in my previously submitted comments I addressed the extreme draught in conditions in the Southwest. The future outlook for rain in the Southwest appears bleak, meaning draught conditions will continue for years. The FEIS has not adequately addressed the impact of mining operations and the millions of gallons of water which are required for processing. I feel the FEIS has not provided detailed analysis of the impact a mine would have on our limited water resources. Please respond to my concerns that a mine would destroy 63 springs and seeps that are critical for the plants and animals that use them. Also please consider Cienega Creek, which provides habitat for several additional imperiled species. There is no way to mitigate the destruction of these waters.

Tribal Nations cultural landscape will be irrevocably affected by a mine. In fact the Tohono O'odham Nation concerns have not been adequately addressed. The FEIS did not specifically address the destruction of historic properties, including traditional cultural properties, archaeological sites, historical structures, districts, and landscapes. This includes the destruction of 96 National Register of Historical Places eligible historic properties, consisting of 62 prehistoric sites (28 are known or likely to have human remains), 32 historic sites, and 2 multi-component prehistoric/historic sites. The FEIS does not address a plan that would assure that none of these features would be disturbed.

Safety issues have not been adequately addressed in the FEIS. In my previously submitted comments I addressed safety concerns. Scenic Highway 83 is not capable of supporting the 24 hour per day x 7 days per week movement heavy truck traffic which would be necessary to support mining operations and for logistics support. State Highway 83 is already a dangerous road. The FEIS does not address the complexity and risks of large trucks and equipment entering and exiting Hwy. 83 at slow speeds while citizens are traveling on Hwy. 83 in school buses, cars and motorcycles. There are many risk factors such as mining rocks and equipment falling off of trucks on Hwy. 83 which may result in deaths.

One additional critical issue concerns Air Pollution from the proposed mine. The FEIS provided only generalized response to this critical issue. I believe the FEIS lacks scientific rigor and a peer review by associated Government agencies with expertise in air quality such as the EPA. In my previously submitted comments I expressed my concern with regard Air Pollution from a mine. I believe the FEIS does not fully address a plan for compliance with local air quality regulations, State ADEQ laws, and most importantly the EPA. I value the judgment and expertise of the EPA on Air Quality issues.

I urge your office to deny Rosemont Copper's permit to construct a Copper mine in the Santa Rita Mountains based on my objections, as well as the objections from the residents of small communities in Southern Arizona who also oppose this mine.

Regards,

Douglas J. Downing

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