

Joan Money (formerly Joan Curtiss)
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February 13, 2014

Reviewing Officer
Regional Forester/Deputy Regional Forester
USFS Southwest Region
333 Broadway SE
Albuquerque, NM 87102

Re: Formal Objection to Final Impact Statement (“FEIS”) & Draft Record of Decision (“DRD”) for the Rosemont Copper Project: A Proposed Mining Operation, Coronado National Forest

Responsible Official: Jim Upchurch, Forest Supervisor
National Forest, Ranger District: Coronado National Forest, Nogales
Ranger District

Dear Sir or Madam:

Please consider this letter my formal objection with regard to the FEIS and DRD and MY continued objection to the proposed Rosemont Copper Project. You will find my prior comments in Jim Upchurch’s Coronado National Forest’s records of comments during the scoping process as well as the draft EIS process under the name of Joan Curtiss, my name prior to marriage, or Joan Money, my married name. I continue to be concerned that my comments have not been adequately addressed or even considered.

One of my primary concerns is regarding Rosemont’s use of groundwater. My comments seem to have been dismissed by a statement in Chapter 3 of the FEIS that there would be no adverse impact to water quality since (primary) standards would be met. There is also a discussion that aesthetic or secondary standards are not mandatory therefore were not considered. I certainly object to this rationale. Domestic well water with offensive taste odor, color, etc has a serious impact on drinkability. Domestic groundwater wells are the sole source of drinking water for my family and for many of my neighbors. If these wells have drinkability issues, that very quickly become a risk to the health of the people who

depend on safe drinking water. This is a serious adverse environmental effect that should result in a no-action decision.

There are also statements that there will be groundwater monitoring plans in place. Monitoring is necessary but it is not adequate. A plan to monitor an aquifer for water quality does not constitute a plan to ensure an aquifer will not be polluted. It is like watching for cancer and then at stage 4, deciding to take action! This is just not acceptable when it comes to the basic needs of all living beings relying on safe and clean drinking water!

My comments, along with comments of more than thirty other concerned citizens, concerning prohibiting mining, in response to the DEIS have been personally submitted. Many of these comments seemed to have been dismissed by a statement seen numerous times in the FEIS:

“The Forest Service may reject an unreasonable Mine Plan of Operation but cannot categorically prohibit mining or deny reasonable and legal mineral operations under the mining laws.”

It cannot be considered reasonable that a relatively few people will benefit for a relatively short period of time at the greater expense, both economically and environmentally, of a much larger number of citizens in the impacted areas of Pima and Santa Cruz Counties for a much longer time (in perpetuity) should this mine be approved. The MPO should therefore be considered unreasonable and must be rejected.

My comments, along with those of several others in response to the DEIS have been personally submitted regarding pit dewatering and pit reclamation (pit lake). In light of this, the analysis discussion on page G-36 of the FEIS is inappropriate. It is inappropriate to accept only the favorable results of analyses while disregarding the unfavorable results. I do not believe this mine should force us or future generations to endure any decrease in water quality because it will not violate standards, let alone allowing anything outside of those water quality standards. To simply cast aside the possibility that unpredicted outcomes may occur is irresponsible and inadequate considering the consequences of a polluted aquifer on the inhabitants of a desert region. A plan to monitor an aquifer for water quality does not constitute a plan to ensure an aquifer will not be polluted. The consequences of this mine including the environmental damage it will cause are irreversible. No amount of monitoring can change that. The MPO should not be accepted.

My comments along with those of many other concerned parties regarding post mine reclamation were submitted during the DEIS stage. Our comments appear to have been dismissed by a statement seen in the FEIS:

“In the case of the Rosemont Copper Project and other open pit hard-rock mines, restoring pre-mining conditions is not feasible for technical, economic, and environmental reasons.”

The authors of the 1872 hard rock mining law could not have imagined what is described in the proposed Rosemont MPO that is currently before us. Consider how many mules and men with picks and shovels it would take to mine that ore in 1872. It is suggested that in 1872 it would have been infeasible to mine the ore for technical, economic, and various other reasons. If restoration to pre-mine or nearly pre-mine condition would not have been feasible in 1872 under the then current 1872 mining law, it remains infeasible today for those same reasons. The MPO must not be approved until the time comes when it is technically, economically, and environmentally feasible.

My comments and those of others regarding pit backfill seem to have been overlooked by a statement seen in the FEIS:

“After reviewing pertinent information, the Forest Service determined that neither full nor partial pit backfill is feasible for technical, economic, and environmental reasons.”

My concern regarding the pit backfill is similar to that addressed above: The authors of the 1872 hard rock mining law could not have imagined what is described in the proposed Rosemont MPO that is currently before us. Consider how many mules and men with picks and shovels it would take to mine that ore in 1872. It is suggested that in 1872 it would have been infeasible to mine the ore for technical, economic, and various other reasons. If pit backfill to pre-mine or nearly pre-mine condition would not have been feasible in 1872 under the then current 1872 mining law, it remains infeasible today for those same reasons. The MPO must not be approved until the time comes when it is technically, economically, and environmentally feasible.

Thank you for your consideration.

Sincerely,

Joan Money