

11315 E. Camino Aurelia  
Corona de Tucson, AZ 85641-2224  
Telephone 520-762-5105  
February 14, 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 copper Project: A Proposed Mining Operation, Coronado National Forest  
Project Name: Rosemont Copper Project: A Proposed Mining Operation

Responsible Official: Jim Upchurch, Forest Supervisor

National Forest, Ranger District: Coronado National Forest, Nogales Ranger District

Reviewing Officer,

There are records of several comments that I have personally submitted in response to the DEIS regarding the mine impact on the water quality of domestic groundwater wells. These comments seemed 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 are predicted to be met. There is also a discussion that aesthetic or secondary standards are not mandatory and therefore were not considered. I certainly object to these statements. Domestic well water with offensive taste odor, color, etc. will have a serious impact on drinkability. Domestic groundwater wells are the sole source of drinking water for my neighbors and me. If these wells have drinkability problems, that very quickly becomes a health issue. 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 by itself 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.

Sincerely,

A handwritten signature in blue ink on a light-colored background. The signature is cursive and appears to read "Tom Money".

Tom Money

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Reviewing Officer,

There are records of several comments that I have personally submitted in response to the  
DEIS regarding pit backfill. These comments have been dismissed by a statement seen in  
the FEIS on page G12:

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

This is inadequate. It does not follow that if something is difficult to accomplish, it does  
not need to be done. The authors of the 1872 hard rock mining law could have hardly  
imagined what is described in the proposed Rosemont MPO that is before us in 2014.  
Consider how many mules, and men and women with picks and shovels it would take to  
mine that ore in 1872. It could be suggested in 1872 that it would have been infeasible to  
mine the ore for technical, economic, and various other reasons. If pit backfill is not  
feasible today for technical, economic and environmental reasons, the MPO must be  
rejected until the time comes when it is technically, economically, and environmentally  
feasible.

Sincerely,

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Reviewing Officer,

There are records of several comments that I have personally submitted in response to the DEIS regarding pit dewatering and pit reclamation (pit lake). In light of this, the analysis discussion on page G-36 of the FEIS is unacceptable. It is inappropriate to accept only the favorable results of analyses while disregarding the unfavorable results. This proposed mine should not force us or future generations to endure any decrease in water quality because it is predicted it will not violate standards, let alone allowing anything outside of those water quality standards to occur. To simply cast aside the possibility that unpredicted outcomes may occur is irresponsible and inadequate considering the consequences of a contaminated 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 become contaminated. The consequences of this mine including the environmental damage it will cause are irreversible. No amount of monitoring can change that. The MPO must be rejected with a no-action decision.

Sincerely,

A handwritten signature in blue ink that reads "Tom Money". The signature is written in a cursive style with a large, looped "M" and "Y".

Tom Money

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Reviewing Officer,

There are records of several comments that I have personally submitted in response to the  
DEIS regarding post mine reclamation. These comments have been dismissed by a  
statement seen in the FEIS on page G-23:

“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.”

This is inadequate. It does not follow that if something is difficult to accomplish, it does  
not need to be done. The authors of the 1872 hard rock mining law could have hardly  
imagined what is described in the proposed Rosemont MPO that is before us in 2014.  
Consider how many mules, and men and women with picks and shovels it would have  
taken to mine that ore in 1872. It could be 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 is not feasible today for technical,  
economic and environmental reasons, the MPO must be rejected with a no-action  
decision until the time comes when it is technically, economically, and environmentally  
feasible.

Sincerely,

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National Forest, Ranger District: Coronado National Forest, Nogales Ranger District

Reviewing Officer,

There are records of more than thirty comments that I have personally submitted in  
response to the DEIS. Many of these comments 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 is objectionable that these comments were dealt with in such a wholesale fashion. It is  
judging the proposed mine from a very narrow and overly simplified viewpoint that if the  
small pieces of it pass legality tests, the whole project must be good. 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 inhabitants for a much longer period of time, in some instances in  
perpetuity, should this mine be approved. The MPO can therefore be considered  
unreasonable and must be rejected with a no-action decision.

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Reviewing Officer,

There are records of several comments that I have personally submitted in response to the DEIS regarding reclamation bonding. Although the bonding discussion on page G-19 and G-20 of the FEIS is a revision from the DEIS, it is still unacceptable. The calculation of the amount of the reclamation bond whether calculated by the proponent, or by NFS is not available for public scrutiny, verification, or comment as part of the permitting process. The scope and cost of required stabilization, rehabilitation, and reclamation work should be made known as part of the public process. Using the FEIS and DROD as it now stands, a prediction of the magnitude of the bond can surely be made. This FEIS / DROD process must be stopped until a bond calculation can be completed and exposed for public comment.

Sincerely,

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Tom Money