

2014/2/14

Re: Comment on Rosemont Copper Project  
Coronado National Forest, Jim Upchurch, Forest Supervisor

I have examined your decision to approve the Rosemont Mine and would like to file an objection. Those proposing the mine and those who have evaluated the proposal for the USFS have used relatively optimistic assumptions about water in the region. It is very clear that Arizona faces the real threat of water shortage over the proposed life of the mine. CAP deliveries to Sahuarita cannot be an effective mitigation if they are not available. Given that Arizona's Colorado River water rights are junior to California's, there is a real possibility that the water will not be available. The proposed mine will directly affect the Ciénega Creek watershed, an endangered habitat type in southern Arizona. It makes no sense to acknowledge that there will likely be a negative impact on this endangered habitat and then approve the mine proposal.

The USFS has not effectively addressed the impact of light pollution from the mine on our economically and academically important astronomical observatories. The noise and dust pollution generated by the mine and transport of the ore will also have significant health and safety impacts that the USFS has not adequately addressed.

The USFS has a long history of underestimating the impacts of mines and the public ends up paying the costs. The only ways to avoid the public having to assume the costs so that a private company can gain is to not approve the mine or to require a multi-billion dollar deposit placed in escrow before any construction begins. The potential mitigation and rehabilitation costs will likely be in that cost range. The USFS has not taken either of these actions. The USFS has also not required the company to guarantee the baseline flow and water quality in Ciénega Creek, a resource in which the public has a significant investment.

I strongly encourage you to reconsider and reject this mine proposal. Failing that, the company should at least be required to post a multi-billion dollar deposit in a USFS escrow account to cover potential environmental and economic damages to others and require the company guarantee the baseline flow and water quality in Ciénega Creek

Thank you for considering my comments.

Sincerely,

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