

**From:** [bea](#)  
**To:** [FS-objections-southwestern-regional-office](#)  
**Subject:** Rosemont Mines  
**Date:** Sunday, January 05, 2014 2:59:50 PM

---

Reviewing Officer  
Southwest Region, U. S. Forest Service  
333 Broadway SE  
Albuquerque, New Mexico 87102

I have read hundreds of pages of pro and con findings on the location of this mine in our mountains but I'm no expert regarding technical terms and names, and decided to just present my case as someone who has lived in this state since I was a teenager in the sixties.

- There have been times in the past when the San Manuel mines were in full operation and a thick haze would drift between the Rincon and Catalina Mountains and cover the eastern valley of Tucson. In the 1980s when I lived in the lower foothills, I had a clear view of the Santa Rita Mountains to the south. Development, drought with subsequent dust, and emissions from various sources have now made that impossible. To state that the Rosemont Mines will not add to the visual and environmental pollution is naive and simply not possible.
- Arizona has been in a drought for more than 16 years, with no forecasted end in sight. Our rainfall in 2013 was three inches below what is considered the normal average. We pay high water bills because water is scarce and the water table is falling, yet we continue to build. The Colorado River was an interim fix but is now dropping rapidly and when the flow reaches a point where that water is no longer available, Arizona will be in an unfixably arid condition, with subsequent dropping ground water levels. As nearly as I can tell, the mine will draw vast amounts of water and the threat to the already distressed wet areas will dry up the few remaining continuous streams in southeastern Arizona, including, according to the EPA, substantial loss and/or degradation of water quality and other aquatic ecosystem functions in upstream tributaries of these rare and protected aquatic resources. The proposed project site supports 101.6 acres of waters, including wetlands in the Cienega Creek watershed, providing sediment transport and deposition downstream, energy dissipation, groundwater recharge, hydrologic and geochemical connectivity and biological connectivity to the Santa Cruz

River. Davidson Canyon Wash is a rare spring-fed, low elevation desert stream supporting a variety of rare flora and fauna. At least seven endangered or threatened species occur within or adjacent to this area projecting adverse impacts as reasonably foreseeable. There is a very real threat to water quality in both of these areas.

- The EPA believes there is serious concern for significant degradation of waters on human health and welfare due to groundwater depletion and loss of cultural resources as well as concern over the very nature of mining; tailings, runoff of contaminated water, serious depletion of underground water levels. They discuss pollution, but I would add, in addition to long words and unrecognized contaminants, that the quality of the valley will suffer no matter what Rosemont Mines say to the contrary, simply because this part of Arizona is a "bowl" shaped by the surrounding mountains, which will add to the inability to move the polluted air out and away from the valley.
- The EPA has listed numerous reasons why this mine should not be allowed, mostly ignored even by the mine company itself as they continue to prepare for operation. Many factors for concern seem to have arisen, including "expert reports" provided by Rosemont that from sources which are not unbiased, in a direct conflict of interest in the form of reports prepared by people with interests in seeing the mine go forward. I fear the Game and Fish Department may be influenced by an offer of \$10 million dollars over ten years. The mine is vague as to when or what or where things will happen. They have displayed no empathy for a fragile desert environment.
- Do you have any idea how precious trees are to the desert; how environmentally necessary they are to native species and man alike? Yet approximately 300,000 trees, mostly juniper and oak, will be cleared from public land in the Santa Ritas. The Forest Service has learned through the Freedom of Information Act that 23,261 cords of wood or roughly 66,000 tons, are on public land and slated for clearing. Mine opponents say the tree clearing would symbolize Rosemont's ecological damage, destroying habitat for many bird species in the area as well as no longer being present to offer the important function of carbon sequestration, erosion control, wildlife protection and food or even natural desert beauty. There is also a cultural significance of the oak trees for the Tohono O'odham Indian tribe. Evidently Rosemont will not comment on the trees until the Forest Service releases a draft decision. This has been the way

Rosemont has operated thus far, darting and dodging and appealing to Senators McCain and Flake, neither of whom has hard facts or any real interest in Southeastern Arizona, and who believe promises of jobs that are not forthcoming.

- The senators laud the promise of jobs, jobs, jobs. Like Keystone that first promised 20,000 jobs, with the Chamber of Commerce promising 250,000 jobs and ended up with a more realistic estimate in the end of 35 to 50 jobs, some of which were from Canadians, the 2,500+ jobs promised by Rosemont turn out to be perhaps 400 jobs. 400 Jobs for the permanent destruction of a glorious mountain? Is this a deal you would take in your backyard?
- Pima County Supervisors, who have a reputation for environmental awareness, oppose this mine, and their reasons are sound. The EPA has expressed extreme reluctance regarding this mine as well and seem to have enough facts threatening the way of life for area residents that they should be taken very seriously. In December 2001 Pima County incorporated the Sonoran Desert Conservation Plan into its comprehensive land use plan by establishing the Conservation Lands System as the regional environmental vision. Davidson Canyon is identified as a biological core area and, along with Cienega Creek, an important riparian area. Connecting the Empire, Santa Rita and Rincon Mountain ranges, identified by ADG&F, BLM and Pima County, as a critical wildlife movement corridor -- Davidson Canyon, Cienega Creek and other riparian areas provide a natural habitat mosaic for the wide dispersal and migration of species such as the black bear, mountain lion, bobcat, coyotes, etc. We in Pima County, who understand the need to preserve and protect our treasures, know the meaning of having this system interrupted in any way -- something Rosemont cannot provide and in their secretiveness, could not be believed if they did so.
- Yes, I am just one person, but public land is MY land. Most of the treasured visitor sites in Southeastern Arizona will be affected by this mine, including the incredible Chiricahua National Monument and Forest. Perhaps you need to come to Arizona, see what will be threatened by the imposition of this mine on our fragile, sensitive desert beauty.



- Perhaps you have no knowledge of the San Pedro River near Fort Huachuca, the last un-dammed river in Southern Arizona -- where Fort Huachuca and the surrounding housing is draining the river dry. Unfortunately, the San Pedro River also depends on this same ground water to supply its base, or non-storm dependent, flows. As the Fort and the surrounding areas have grown, they have continued to deplete the aquifer, leading to river dry-up and habitat destruction." The DOD was ordered in 2011 to mitigate their withdrawal. They have ignored the order. The river has begun to experience long periods of dry riverbed. The Fort's pumping continues at an unsustainable level and still threatens the San Pedro. If the ground water pumping is not reduced, the San Pedro River and the life it supports will disappear, which becomes more evident with the growing destruction caused by long-term drought.
- As construction is completed, the number of jobs will decline to about 225 by month 16 with 45 staff wrapping up the work by the last month. This, when they originally promised thousands of jobs. By comparison, a study of the report submitted by interests of Keystone was almost laughable if it hadn't been such a blatant lie. They included dancers, manicurists, bar employees, massage therapists, etc, all unsubstantiated. Rosemont does not say, but the remaining jobs may include people they bring to the site rather than local workers as revealed for the Keystone Pipeline . Some articles seem to suggest a hint of money problems for this company, but I have no proof. If it did happen when the mine was half completed, with trees gone, streams contaminated, air polluted, who would take responsibility?

I don't know what else to say to you to make you understand the tragedy of this mine in this location other than suggest that you take a trip to Safford and then to the Santa Rita Mountains and surrounding

environmental special places and then respond to human emotion versus alleged facts. The bottom line is that a mountain can never be rebuilt, it's beauty never restored. Similar mining sites in Arizona where reforestation has been attempted have been an effort in futile despair as the plants and trees withered and died.

Please, put Arizona's unique beauty, environmental future and economic future brought by the thousands of tourists who call this area home during winter months, ahead of this ugly intrusion that promises too little in return. Please. Thank you for your time.



Bea Manderscheid  
6102 East Miramar Drive  
Tucson, Arizona 85715  
[beaone@gmail.com](mailto:beaone@gmail.com)  
[520-296-5204](tel:520-296-5204)