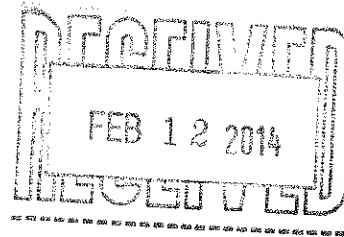


February 7, 2014

Reviewing Officer  
USFS Southwest Region  
333 Broadway SE  
Albuquerque, NM 87102



Dear Fellow Citizens:

My name is Mary Ellen Morbeck, Ph.D., Professor Emerita, Anthropology, University of Arizona. I am a permanent resident who owns property in Sonoita and pays taxes. My mailing address is PO Box 11, Sonoita, AZ 85637-0011. These comments serve as a formal objection to the Final Environmental Impact Statement for the proposed Rosemont Copper project in the Coronado National Forest, Nogales Ranger District. Forest Supervisor Jim Upchurch is the Responsible Official.

Issue: Impact on Cultural Resources (Issue #6)

FEIS Public Concern Statements #322 and #332

#322 The EIS should include additional mitigation and preservation measures for cultural sites, and describe how applicable federal laws would be met.

#332 The EIS should include further describe the importance of Santa Ritas as a Traditional Cultural Property

USFS Responses to Comments #322 and #332

#322 The Executive Summary, Chapter 3-Affected Environment and Environmental Consequences, and Appendix G-Response to Comments on DEIS show that Rosemont Copper has communicated with appropriate agencies and created a MOA/HPTP/POA to monitor and mitigate cultural resources. MOA/HPTP relate to the National Register of Historic Places and Native Graves Protection and Repatriation Act. POA centers on appropriate treatment of human remains.

#332 USFS now views the Santa Rita Mountains as an important cultural resource that is worthy of inclusion in the National Register of Historic Places. The mountains are recognized as a Traditional Cultural Property of the O'odham, Apache, Puebloan, and Pascua Yaqui peoples. Discussion of impacts on cultural features show new understanding of Issue#6, Impact on Cultural Resources.

Mary Ellen Morbeck Letter (#7662)

My letter (#7662) highlights five issues: 1) Rosemont Copper's proposed project must preserve the cultural landscape; 2) Coronado National Forest must comply with federal rules and explain the plan to citizens; 3) Rosemont Copper must be required to enhance

and better explain mitigation plans; 4) Rosemont Copper must be required to sign a legally-bound and financially-responsible contract for mitigation plans; and 5) importance of Titled section "Irretrievable and Irrevocable Commitment of Resources..." FEIS relevant texts are the Executive Summary, Chapter 3-Affected Environment and Environmental Consequences, and Appendix G, Response to Comments on DEIS.


#### Objections

Damage and/or destruction to cultural features result in a permanent loss. Adequate discussions of most of my initial comments do not substitute for potential future actions that may compromise cultural entities.

#### Remedy

Rosemont Copper must be watched carefully via a legal mechanism to comply with the MOA/HPTP/POA. Full transparency with sharing of Rosemont Copper's actions related to cultural resources must be communicated in writing to tribal authorities and made available to other citizens during all phases of the project. A revised Rosemont Copper business plan must emphasize this commitment during and at the end of the proposed project – or at anytime the project fails. If this does not happen, Rosemont Copper's project should be terminated.

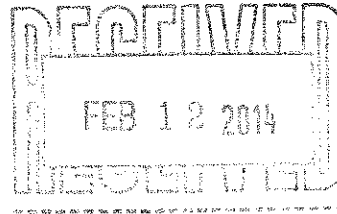
Sincerely,



Mary Ellen Morbeck  
PO Box 11  
Sonoita, AZ 85637-0011  
(520) 455 -5803

February 7, 2014

Reviewing Officer  
USFS Southwest Region  
333 Broadway SE  
Albuquerque, NM 87102



Dear Fellow Citizens:

My name is Mary Ellen Morbeck. I am a permanent resident who owns property and pays taxes. My mailing address is PO Box 11, Sonoita, AZ 85637-0011. These comments serve as a formal objection to the Final Environmental Impact Statement for the proposed Rosemont Copper project in the Coronado National Forest, Nogales Ranger District. Forest Supervisor Jim Upchurch is the Responsible Official.

Issue: Impact on Transportation/Access (Issue #12)

FEIS Public Concern Statements #258 and #896

#258 The Coronado National Forest should not allow the Rosemont Copper Company project to move forward because of increases in road deterioration, maintenance, costs, traffic volume, commuting times and public safety concerns, as well as impacts to the "scenic road" designation of State Route 83.

#896 The Coronado National Forest should revise the transportation analyses to include a wider analysis area, and incorporate updated baseline data, including a more accurate highway classification of State Route 83 and a re-evaluation of peak and nonpeak data, to remodel traffic and provide a full disclosure of transportation costs and impacts, including the effect of impacts to volume and level of service, road condition, potential for fatalities and accidents, and impacts to scenic designation.

Mary Ellen Morbeck Letter (7584)

My letter (#7584) highlights trips to Tucson via scenic highway State Route 83 for the purposes of consultation and treatment for chronic medical issues as well as shopping for food and other items. Negative consequences of the Rosemont Copper plan include: physical nature of scenic highway State Route 83; negative impact of increased traffic volume including large truck "wide loads" and increased transit time and safety; frequency of vehicular accidents and traffic injuries plus risks associated with hazardous materials; Emergency Services including financial responsibility for these services and long- and short-term health costs caused by delays in obtaining critical medical attention; and, finally, destruction of scenic highway State Route 83, especially related to tourist economy. FEIS relevant texts are the Executive Summary, Chapter 3-Affected Environment and Environmental Consequences, and Appendix G, Response to Comments on DEIS.

## USFS Responses #258 and #896

#258 The Executive Summary, Chapter 3-Affected Environment and Environmental Consequences, and Appendix G-Response to Comments on DEIS discuss transportation issues. The FEIS is said to provide more clarity with better organization of topics. Texts now refer to new traffic analyses that reflect citizens' concerns. These include, for example, increases in traffic volume, potential for accidents with injuries and/or fatalities, required road construction and ongoing maintenance, hazardous materials, Emergency Services, and landscape views on scenic highway State Route 83.

Proposed mitigation efforts for several challenges and explanations for doing nothing about other issues are presented. New analyses of traffic volume include a wider boundary and integration of more data. Other mitigation measures include, for instance, new arrangements with ADOT to maintain road conditions and school bus pullouts. Sulfuric acid will not be delivered to the mine. Carpooling no longer is considered a mitigation measure. Emergency Services are not considered worthy of financial or logistical help. Local agencies support these services with taxes paid by local residents. Rosemont Copper will pay appropriate taxes. Finally, visual analysis indicates no impact on the scenic roadside view of the landscape.

#896 Text mostly repeats issues presented in #258.

## Objections

The USFS FEIS, Rosemont Copper, and corporate investors fully accept negative consequences for local citizens as part of Rosemont Copper's business plan. In response, I submit that these are more than residents' personal and/or business inconveniences. A wide range of difficulties, for example, resulting from increase in traffic volumes (including large trucks), disruption of traffic flow due to road conditions, longer commute times, and greater opportunities for accidents related both to vehicles and/or hazardous materials create huge short- and long-term problems for local residents who use the scenic highway State Route 83. Consequences for Rosemont Copper's residential neighbors decrease quality of lives, both in terms of livelihoods and, in some cases, affect life-and-death medical situations. Meager mitigation measures cannot resolve the effects of mining activities. Effects are far more severe than the USFS FEIS portrayal of mitigation solutions to what is expressed as only a traffic problem. Large trucks hauling equipment to the mining area as well as products and waste out significantly change the dynamics of scenic highway State Route 83. Providing school bus pullouts is okay but does little to assist other local residents, including emergency vehicles, who confront Rosemont Copper trucks.

## Remedy

Rosemont Copper knows that near the site of their access road from scenic highway State Route 83 already is among Arizona's most dangerous roads as indicated by the high frequency of accidents. Before the mine project moves forward, Rosemont Copper should reconsider moving some large equipment and/or mining products and waste via a


Westside route. Rosemont Copper also should decrease the numbers of mining vehicles and trips per day.

Most important, Rosemont Copper should contract with local Emergency Services to provide *full financial support* for delivery of these services during the entire time frame for mining activities. This action should be part of Rosemont Copper's business plan.

In my letter I ask, "Who will pay for Emergency Services..." Rosemont Copper's answer is not adequate. Rosemont Copper's leaders seem happy for local taxpayers to pay for problems they create. (They offer to pay their taxes but not to assist others). Their answer to my question shows lack of recognition of the needs of other people who live and work in the region.

A revised Rosemont Copper business plan should reflect these changes. Rosemont Copper must be required to negotiate a legally-bound, financially-responsible contract for mitigation during and at the end of the proposed project – or at anytime the project fails. If it does not happen, then the project should be terminated.

Sincerely,

A handwritten signature in cursive script that reads "Mary Ellen Morbeck".

Mary Ellen Morbeck

PO Box 11  
Sonoita, AZ 85637-0011  
(520) 455- 5803