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REGIONAL FORESTER'S OFFICE  
SOUTHWESTERN REGION

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Subject: Format Objection to Final Impact Statement (FEIS) and Draft Record of Decision for the Rosemont Copper Project submitted to Jim Upchurch, the Responsible Official.

I write in vehement opposition to the proposed Rosemont open pit copper mine in the Santa Rita Mountains located within 6 miles of our home. I submitted a response during the objection process to the project during the draft EIS.

My family and I are longtime residents of Corona de Tucson. We pay taxes on properties we own in Corona de Tucson and Vail, Arizona. We are voters. We are desert dwellers who know these lands and the scarce and fragile resources they provide.

My husband and I have carefully guarded our land and its valuable resources so that we might pass on an appreciation for these places and our properties as legacy to our children. Our daughters and their husbands have done the same for our grandchildren. We only hope that we can continue that legacy for the generations that ensue. We face the destruction of our property, our community and our very way of life. In trade for a few jobs, whose numbers wildly fluctuate, and a publicity juggernaut that pays handsomely for good press, we could see permanent and extensive environmental destruction to our homeland.

We need to remind the USFS that Augusta Resources is not a mining enterprise but is, in fact, an investment firm with shaky credentials and a history of deceit. When the company admits that nearly 300,000 trees will be destroyed we know that is the bare minimum number of trees in jeopardy. When our local daily newspaper, whose ever dwindling readership places the company in dire financial straits, endorses the mine plan it is on the same day a full page advertisement for the proposed mine project appears in the paper. The locals first encounter with the Rosemont version of integrity happened when the company rounded up a group of unemployed folk from the inner city, promised them jobs, transported them to a USFS meeting, gave them a free lunch and a thumbs up for Rosemont sign to pin to their chests and then avowed the audience favored the proposed mine. Such underhanded trickery bodes ill for projections made by the company on job creation and their stated lack of intent to mine sites on the north face of the Santa Ritas, Broad Top Butte, Peach-Elgin and Copper World, which they own/control.

## Air Quality

The FEIS states that potential changes in air quality as the result of the proposed mine are deemed a significant issue. (P219) With Pima County's rejection of the company's air quality permit, Rosemont Copper, through political maneuvering, went to the Arizona Department of Air Quality to be permitted. Because of ongoing state budget cuts the state's department is poorly manned. The staff of AZDQ, whose noses and lungs do not reside in proximity to the proposed mine, rubber stamped the air quality permit. Local and Federal agency concerns include the EPA who state that particulate matter 10 micrometers in diameter or smaller when set adrift and inhaled cause serious health effects. These pollutants can travel long distances. There are 2 schools in Corona de Tucson, 2 high schools south of I-10. This project will jeopardize the health of our youngsters. There are many elderly people living in Corona de Tucson, who's cardiac and respiratory afflictions will be exacerbated by the insidious expulsions from the mine and associated activities such as vehicle emission and power plant sludge. These issues have not been resolved in the FEIS.

The National Park Service is concerned that air pollution from the proposed mine will worsen visibility throughout the area including at Saguaro National Park both East and West. The increases in pollutants from the mine may mean the area will not meet the State's visibility goals. The Park is under consideration for expansion by the Department of the Interior, according to US Representative Peter DeFazio, a senior member of the House Committee on Natural Resource who represents the 4<sup>th</sup> District in Oregon. Congressman DeFazio recently visited southeast Arizona. The study estimates the nitrogen deposition within the current boundaries of Saguaro National Park East will increase 4 fold. (P246) Increase in nitrogen promulgates the growth of nonnative and harmful plants.

Reduced Visibility combined with light pollution from a mine proposed to work 24 hours a day will adversely affect the important astronomy studies done in the Santa Rita Mountains according to the Smithsonian Institution which runs the Whipple Observatory using mirrors manufactured at the University of Arizona. It merits consideration that astrophysicists and engineers in various aspects of space exploration are more highly paid than truck drivers and hard rock miners as Rosemont touts the economic largess of their enterprise.

Additionally, the spread of valley fever throughout the Tucson Valley is an ever increasing threat to the population. A January 19, 2014 issue of the New Yorker magazine cited the state of Arizona has more than 80% of the diagnosed cases of valley fever worldwide. Valley fever spores are circulated when the topsoil of the desert floor is disturbed. One can but imagine the result of the plowing and scraping of 4,000 acres of desert of the desert floor.

Increased nitrogen emissions in the polluted air will foster the growth of buffelgrass and other nonindigenous plants, adding to the threat of fire activity and damage to wildlife habitat.

The property around Arizona State Route 83, Sonoita, Elgin and Patagonia are tourist havens with dude ranches, wineries, bed & breakfasts, wildlife sanctuaries, restaurants and hotels all making a living from visitors eager to enjoy the scenic wonders that make up that beautiful landscape. Sadly, visibility, an important aspect of air quality, will be diminished as a result of air contamination throughout the area of the mine and for as far away as the Saguaro National Park to the north of the mine site.

## Surface Water Quantity

According to the FEIS, the Barrel Canyon alternative will reduce surface water run-off to Davidson Canyon and Cienega Creek substantially. The loss of run-off is likely to approach a reduction in average annual run-off of 30-40%. ( P429) Twenty percent of the groundwater in the Tucson Valley comes from this watershed. Rosemont's premise is that recent modifications to the proposed plan lessen that projected reduction by half but does not ensure the perpetuation of those crucial waterways. Reduced flow of surface water means reduced recharge of the

aquifer, an aquifer that is already imperiled by overpopulation in the Tucson Valley and existing open pit copper mines in the vicinity. The mining operation will use vast quantities of water in a state that has been suffering decades of perpetual drought and there is now scant additional water available from the Colorado Arizona River Project. Drawdowns of over 100 feet are projected in the area of the mine site and the FEIS states the accuracy of these estimates is quite limited. This plan fails to adequately protect the vital watersheds in the area. Surface water flow into drainages downstream of the mine will be permanently decreased and the loss of seeps, springs and riparian areas will cause permanent adverse effects that will never be undone. (P.1135)

### Surface Water Quality

The mine pit will collect runoff from the mine tailings and waste rock creating a lake of toxic acid water that will flow into the existing water supplies in southern Pima County and northern Santa Cruz County imperiling wildlife and livestock and threatening the human population of the entire area. Davidson Canyon and Cienega Creek are designated "Outstanding Waterways" within the state of Arizona and the water quality must not be degraded. (P.401) Furthermore the runoff from the tailings and leach facilities will carry sediment and pollutants into vital water sources, degrading them beyond State water quality standards. (P.444) The study concedes the preferred Barrel Canyon alternative renders storm waters capable of exceeding the total allowable concentrations of suspended solids. (P.454) Damage to seeps, springs and riparian areas would be irreparable and destruction to vegetation in riparian areas would be irreversible. (P.1139)

### Ground Water Quantity

The proposed mine will consume 2 billion gallons of ground water per annum, drained from the Santa Cruz Valley. This lush and verdant valley, one of the last remaining agricultural areas in Pima County, will be rendered a wasteland after 20 years or more as a result. The drop in groundwater level at the mine site is estimated to be 90 feet. (P.330) The wells for livestock and domestic use close to Davidson Canyon will see a drop in levels of 10 feet or more. The residents of Corona de Tucson could see a drop in the level of their wells of 5 feet, wells managed by the Tucson Water Department that provide tap water to all the residents of our town. Even after closure of the mine, the mine pit will continue to have an impact on ground water availability. (P.288)

Water use in this area has increased dramatically over time. There are approximately 550 registered wells in the within 42 miles of the mine. (P.337) According to the 2010 US Census, the town of Corona de Tucson saw a **597% increase** in population between 2000 and 2010 and the area continues to grow. Changes in groundwater availability caused by subsidence throughout the region will cause alterations in ground water direction flow impacting water availability. The drop in groundwater levels will not recover after mine closure unless the levels throughout the region increase. (P.330) Based on projections on climate change such increases are virtually unattainable. Water companies providing potable water to the population of the Tucson Valley will see the water levels drop between 10 and 30 feet over during actual mining and the levels will continue to drop, albeit at a lower rate after closure. (P.337)

In these stark desert climes, water is the lifeblood of the region. Can we continue to sustain the population of southern Arizona if we deplete our already threatened aquifer? The Central Arizona Project is not the solution. The Colorado River cannot satisfy the demands from Phoenix and Las Vegas, the needs of the Tribes and of agriculture and requirements for recharge of the groundwater used by the population of the Tucson Valley. Does copper ore trump water in importance? Never!

### Ground Water Quality

Mine operations will impact groundwater quality as toxins seep from waste rock and tailings, pollutants

bleed from heap leach processing facilities. Contaminates percolating from the permanent, fetid pit lake will also degrade the quality of the ground water. (P.362-364) The geochemistry of the pit lake will remain a potential hazard in perpetuity. One must but drive to Bisbee and look at the sludge in the bottom of the Henry Lavender mine, a hole that is smaller than the proposed open pit Rosemont mine. That revolting accumulation of water and sediment and toxins has been there for years and years and will be there far into the future.

I note that the U.S. Environmental Protection Agency (EPA) Says Rosemont 's Water Protection Plan is "Grossly Inadequate" – After conducting a comprehensive and thorough review of Rosemont's proposed water pollution mitigation plan, the EPA informed the US Army Corps of Engineers in a November 7, 2013 letter, that Rosemont's proposed plan is "grossly inadequate" and "does not comply" with Clean Water Act Guidelines. EPA concluded that the Rosemont mine project "should not be permitted as proposed."

### **Fire Management**

Because of altered water routes and topographical changes, fuel loads in the area of the mine and the adjacent Coronado National Forest are increasing the threat of wild fire and the severity of such conflagrations. Mining activities such as blasting and the use of flammable materials, fuels and explosives will add to the menace. Increased vehicular traffic will contribute to the peril as well. (P.907)

Manpower and equipment used in suppressing wild fires on the Coronado National Forest are paid for by the federal government. Sadly, the destruction of nearly 4,000 acres of publicly owned forest will not garner a dime for the taxpayers of the nation and they will be on the hook to pay for the cost of fire suppression.

Wild fires outside the national forest will be paid for not by Rosemont mine, no, those costs will be covered by the jurisdiction in which the fire occurs. The State of Arizona and Pima County will pay for firefighters and equipment to fight fires on these lands.

It is the duty of the Corona de Tucson Fire District Governing Board to maintain fiduciary responsibility to the taxpayers of the district. As an elected member of that body, currently acting as the Chair, I would be derelict in my duty if I failed to stress that equipment purchase and maintenance, supplies and employee compensation and training are funded by property taxes in the district. The proposed Rosemont mine is not within the boundaries of the Corona de Tucson Fire District, nor any fire district and is not accountable for any costs accrued by the taxpayers when our firefighters and firefighting equipment is dispatched to suppress fires near Rosemont property.

### **Transportation/Public Safety**

**We find it imperative that the Rosemont mining ore transportation plans be scrutinized by the National Transportation Safety Board as is rail transport and pipeline conveyance of crude oil and other hazardoux industrial materials. Only that august body possesses the expertise to provide accurate projections on the impact of traffic to and from the proposed Rosemont mine on public safety.**

### **Economics**

Proponents of the proposed mine say there will be an average of over 400 jobs created by mine operations with the average pay of \$59K per annum, even though a search of the web for wage scales for miners in Arizona says

the average pay is about \$35K. Agents for the mine tout this as a boon to employment although it will equate to less than 1% of the job in Pima and Santa Cruz Counties.

The land surrounding Arizona State Route 83, Sonoita, Elgin and Patagonia are tourist havens with dude ranches, wineries, bed & breakfasts, wildlife sanctuaries, restaurants and hotels, all making a living when visitors from all around the globe enjoy the scenic wonders that make up that beautiful landscape. Sadly, visibility will be diminished as a result of air contamination throughout the area of the mine and for as far away as the Saguaro National Park to the north of the mine site. Increased vehicular traffic, particularly huge trucks, will demean the tourists' experience on what was once a scenic highway. The sight of a working mine is not a draw to tourists, if it were there would be a huge tourism business in the towns of Morenci and Globe. Alas that is not true, as a drive through those dying communities will attest.

Jobs will be lost at the Observatories in the Santa Rita Mountains due to decreased visibility from air pollution and from light pollution, estimated to increase by up to 2300%. These highly technical, high paying jobs are unique in southern Arizona. Astronomers at the Smithsonian Institute have sited the possibility of a working open pit copper mine adjacent to their facility as possibly the deciding factor in the loss of the 700 million dollar Magellan Telescope.

About 200 jobs in agriculture, marketing and retail will be lost at the FICO pecan farm, as the water table drops and the trees dry up and die. FICO is the largest pecan growing enterprise on earth, exporting their products all over the world.

Finally, the lucrative jobs in public relations will evaporate should the mine be approved. Advertising has been the only product produced by the mining company to date. Writing copy, printing slick brochures, selling TV, radio, newspaper, and magazine advertisements, all these skills will no longer be necessary. I have no idea how much these jobs pay. I would venture a guess that they are more lucrative than many of the jobs that will open should the mine be permitted.

### Conclusion

As a private citizen, a taxpayer and a resident of the area threatened by the proposed Rosemont open pit copper mine, I have done my level best to delineate and define my objections to the FEIS issued by the USFS. I am not a scientist. In wading through the 6 Volumes of the FEIS, I have tried to discern the changes pertinent to my original objections to the DEIS. Many of my reasons are personal. My family and I cherish this land we call home and we deplore any desecration of the beauty of the desert. We have been guardians of our environment and we have taught our children and grandchildren to be the same. We want to leave behind a legacy not of wealth, but of beauty, not of property but of the majesty that is the northern range of the unsullied Santa Rita Mountains.

I note with alarm that substantial changes have been made before publication of the FEIS. Therefore, the USFS must abandon the current study and present a corrected version of a DEIS for public review.



**Sandy Whitehouse**  
**Corona de Tucson**