

February 12, 2014

U.S. Forest Service  
Reviewing Officer,  
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**SUBJECT: Rosemont Copper Project Objections**

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To Whom It May Concern:

I provided comments on the Rosemont Copper Mine project on January 27, 2012 and specifically expressed concern about the impacts on habitat, traffic and emissions, and destruction of the Santa Rita Mountains. I wish to further comment at this time on two specific issues based on the information provided in the final EIS about the proposed action (Alternative 3--Barrel).

**1. Compliance with the National Ambient Air Quality Standard (NAAQS) for PM10 and PM2.5 Emissions.**

Linkage to my January 27, 2012 Letter

I commented on the traffic, emissions and safety issues associated with heavy truck traffic that will result from this project 24 hours per day, seven days per week. According to the air quality analysis, over 3569 tons of PM emissions, 987 tons of PM10

emissions and 117 tons of PM<sub>2.5</sub> emissions will be created annually by this action. Regarding PM in particular, over 3490 tons of PM emissions are considered fugitive and therefore, "pursuant to state law, fugitive emissions are not included in the determination of major source applicability for non-categorical sources such as copper mines". (ADEQ Fact Sheet on Proposed Air Quality Permit #55223 for Rosemont Copper Company). These fugitive emissions blow in the desert winds right into our communities and impact the air we breathe. PM emissions have significant health impacts on people, especially the elderly and children. How are the fugitive dust emissions and the direct emissions from this project going to be completely controlled and mitigated?

Also under the Barrel Alternative, it is noted that the project meets the PM<sub>10</sub> NAAQS "at the perimeter fence line". Does this proposed project meet all applicable NAAQS both on and off-site of the project footprint?

With respect to off-site emissions, there does not appear to be any requirement to mitigate truck emissions and emissions of all construction and off-road equipment that is used on this project. This can easily be incorporated into a mitigation requirement plan should this project proceed.

## **2. Compliance with NEPA Act Requirements to Consider Indirect Effects and Cumulative Impacts of the Proposed Action**

Linkage to my January 27, 2012 Letter

In my earlier comments I expressed concern over the impacts of this project on habitat (plant, animals, water quality) and on the scenic beauty of the Santa Rita Mountains. I do not believe the FEIS on this project adequately or seriously considers either the indirect or the cumulative impacts of this project. Specifically, the CEQ regulations (40 CFR 1500-1508) define the impacts and effects that must be addressed and considered by Federal agencies in satisfying the requirements of the NEPA process. Indirect and cumulative impacts are defined below.

**Indirect effects** are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the *pattern of land use*, population density or growth rate, and *related effects on air and water and other natural systems, including ecosystems*. (40 CFR 1508.8) (emphasis added).

**Cumulative impact** is the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR 1508.7)

The terms "effect" and "impact" are used synonymously in the CEQ regulations (40 CFR 1508.8).

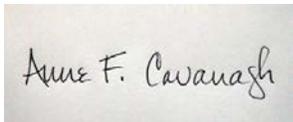
"Secondary impact" does not appear, nor is it defined in either the CEQ regulations or related CEQ guidance. However, the term is defined with the CEQ definition of indirect impact (40 CFR 1508.8). Some authors on this subject have distinguished secondary impacts from indirect impacts, while others; have used the terms interchangeably.

## **Conclusion**

The long term consequence of this proposed project that will last about thirty years (considering start up, extraction and close down periods) is the destruction of important habitat, disruption to ecosystems, impacts to water quality and possibly water availability, harmful emission increases that last the full life time of the project, and the permanent destruction of the scenic vistas of the Santa Rita Mountains. How could these impacts have adequately been considered if this project is allowed to proceed?

Thank you for the opportunity to comment on this Final Environmental Impact Statement for the Rosemont Copper Project. Please feel free to contact me should you have any questions.

Sincerely,

A rectangular image showing a handwritten signature in cursive script that reads "Anne F. Cavanagh". The signature is written in dark ink on a light-colored background.

Anne F. Cavanagh

## Copies to:

Geraldine Siwek, concerned citizen, Green Valley, AZ  
Guadalupe de la Torre, concerned citizen, Tucson, AZ  
Gayle Hartmann, Save the Scenic Santa Ritas  
Pete Dronkers, Earthworks  
Sandy Bahr, Sierra Club  
Paul Green, Tucson Audubon Society  
Carolyn Campbell, Coalition for the Sonoran Desert Protection  
Roger Featherstone, Arizona Mining Reform Coalition  
Randy Serraglio, Center for Biological Diversity  
Thomas Purdon, Friends of Madera Canyon  
Alison Buntin, Mountain Empire Action Alliance  
Acasia Berry, Sky Island Alliance  
Michael Senator, Defenders of Wildlife