

February 11, 2014

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

Dear Fellow Citizens:

My name is John Hoffman. 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.

John Hoffman Letter (#7586)

Arizona Scenic Highway 83 is the primary, in fact, the only transportation route for thousands of people living in the proposed Rosemont mine impact area. The narrow, winding two-lane road is not adequate to handle the increase in traffic that would include mine haul vehicles.

There is no provision for the mining company to be held legally responsible for the improvement to and upkeep of the Scenic Highway 83.

USFS Responses #258 and #896

Traffic analysis has been updated to include anticipated delivery truck and commuter trip numbers. The Bounds of Analysis has been expanded to include routes to the Port of Tucson and to ports of entry on the Arizona/ Mexico border. Updates to mitigation measures have been made to include new agreements between Rosemont Copper and ADOT regarding road repair and between Rosemont Copper and school districts about school bus pullouts. The mine site would not impact the Highway 83 Scenic Highway designation. Rosemont would contribute to the road upkeep by paying more in fuel taxes.

Objections:

The fact that traffic analysis has been updated to include anticipated truck and commuter trip numbers does nothing to relieve the residents in the Rosemont mine impact area of the inconvenience and safety hazards of this very large increase in traffic. The expanded route analysis would suggest the possibility of mine truck traffic using Highways 83 and 82 from the mine site through Sonoita and Patagonia to reach the port of entry at Nogales. This would create an even greater burden on those of us living in areas south of the Rosemont Copper mine site.

It is not reasonable to believe that the visual impact of a 700 foot high and mile wide pile of rock and debris visible from many miles away in almost every direction does not create an eyesore that makes a mockery of the Scenic Highway designation. And the constant flow of oversized mine haul trucks would further diminish that designation.

Without more specific numbers regarding the amount of fuel that Rosemont Copper vehicles will be using and how that translates into fuel taxes, the suggestion that those taxes could pay for all the highway damage that would accrue from the heavy vehicle traffic is speculative at best.

With the recent news that a hostile takeover of Rosemont Copper's parent company is being threatened by a larger competitor and the suggestion by the potential new owner that they will speed up the permitting process, it would seem prudent to wait and see if new ownership of the company might require another new business plan.

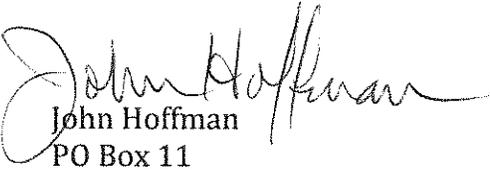
Remedy:

Rosemont Copper should be required to make major improvements to the old road over the pass to the west side of the mountain range in order to divert at least some of the heavy traffic away from Scenic Highway 83.

Rosemont Copper should be required to post a bond in an amount to cover most of the highway maintenance and repair for the portion of Highway 83 on which their heavy vehicles travel. This is in addition to the bond posted to cover reparations and cleanup after the mining operation is finished. They should be required to fill in the mine pit with the tailings when operations cease.

Because the operation of the Rosemont Copper mine would cause such a negative impact over an area far beyond the mine site itself the best possible solution is the No Action Alternative.

Sincerely,


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