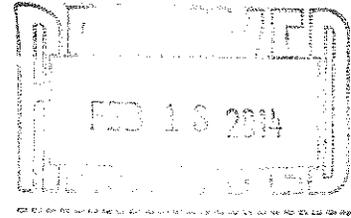


Reviewing Officer, Rosemont Mine EIS  
Southwest Region  
United States Forest Service  
333 Broadway SE  
Albuquerque, NM 87102



## STATEMENT ON TRANSPORTATION ISSUES

The words below are a somewhat different version of words that I wrote for the response of Save the Scenic Ritas to the Rosemont EIS:

It is with some concern that I note the major changes in the Transportation Planning Area in the recently released Environmental Impact Statement for the Rosemont Mine. As compared to the DEIS, the current version of the EIS greatly expands the roads that might bear the many truckloads of copper concentrate that would be generated by the proposed mine. The current plan now includes the possibility of concentrate shipments to Nogales, Naco and Douglas. This generates several important questions:

1. Why now? What has changed in the thinking of the USFS in the period since the release of the DEIS? This is certainly not in response to demands from the public or the communities involved, leaving only Rosemont Copper as a possible source for this change.
2. What is the logic of investigating shipments to Naco and Douglas when the most direct route to the Port of Guaymas is through Nogales?
3. If the concentrate is to go to Nogales by truck, why was a route through I-19 and Sahuarita Road not considered? That would probably be the quickest and most economical route.
4. Assuming that the goal is still to ship concentrate by rail to Mexico, there is no mention of the environmental impact of the construction of transshipment facilities in Nogales, Naco or Douglas.
5. One of the suggested routes from the mine is to Nogales through Sonoita and Patagonia along a route currently designated as scenic. We note that at present a sign posted by the Arizona Department of Transportation in Nogales at the southern terminus of State Highway 82 states: TRUCKS USE I-19 - SR 82 NOT RECOMMENDED. Why is this advice being ignored?
6. With respect to Nogales, the route through or around the city is critical and has not been addressed. Will trucks travel down Grand Avenue which is already very congested? Or will they bypass downtown via South River Road on roads that are narrow, curvy and residential. Who will finance any necessary changes in local roads?
7. Has consideration been given to the negative economic impact on the tourist based economies of Sonoita and Patagonia, already at risk due to the proposed mine?

6. There are 30 road segments listed in Table 168. One segment received a failing grade of "E", three others have a grade of "D", thus "prompting efforts at road upgrades", and ten more are in the "C" category that could easily fall to a "D" with the added truck traffic. This sounds like a prescription for a very large expenditure of public funds. Why is there no estimate of the financial consequences for local city and county governments?

8. Why have local elected officials not been asked to give their comments and advice on this proposal? There is no mention of the position of the Boards of Supervisors of Santa Cruz and Cochise Counties or the City Councils of Patagonia, Nogales, Benson, Tombstone, Sierra Vista, Bisbee or Douglas. I know that no contact has been made with the County Supervisor who represents Patagonia and Sonoita.

8. In the section dealing with railroad shipments of concentrate from Tucson to Nogales it is stated that it

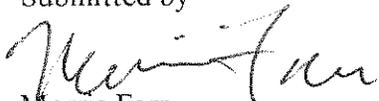
"would take 5 days of mine production to make 1 full train of copper concentrate. Therefore, up to 84 trains per year (7 trains per month) would be attributable to copper concentrate rail shipments through the Nogales port of entry."

My arithmetic says that  $365/5=73$  trains per year. That fact notwithstanding, since the empty concentrate cars would need to be returned from Mexico to the USA, the actual number of trains might be somewhat higher, depending on whether the empty cars could be added to the normal flow of train traffic to the USA. If the concentrate cars are simply emptied and returned, then the actual number of additional trains would be twice the numbers listed above - 168 or 146 - depending on which of the above numbers turns out to be correct.

10. As all residents of Nogales know, east-west auto traffic stops in downtown for an extended period of time when a train enters or leaves the USA. This leads to traffic jams along Grand Avenue, the main thoroughfare, with resultant air pollution, driver aggravation and problems for public safety vehicles. The environmental and social consequences of these traffic delays simply are not addressed.

Finally, it is only with some luck that I discovered this enlarged planning area buried 900+ pages into the gargantuan EIS. This last minute proposal deserves much more discussion and consideration than it has received..

Submitted by



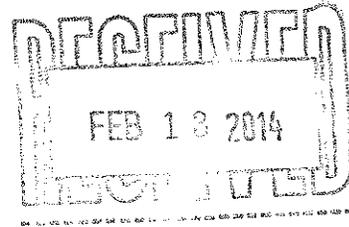
Morris Farr

P. O. Box 527

Sonoita, AZ 85637

Telephone 520-455-9367

Reviewing Officer, Rosemont Mine EIS  
Southwest Region  
United States Forest Service  
333 Broadway SE  
Albuquerque, NM 87102



## STATEMENT ON ENERGY ISSUES

The words below are very similar to those that I wrote for the response of Save the Scenic Santa Ritas for the EIS. I resubmit them, slightly reworded to emphasize my personal conclusions as a professor of nuclear engineering who has spent a good portion of my professional career dealing with energy related problems.

In comments previously submitted by Save the Scenic Santa Ritas for the DEIS, it was stated with respect to the energy demands of the proposed mine:

"...the DEIS is seriously and legally deficient in failing to account for the cumulative impacts of off-site sources having to generate such a huge amount of energy..."

I strongly support this statement that was made with reference to the electrical energy required for the Rosemont Mine. My concern is with the environmental impact of providing such a large amount of electrical energy - about the same as would be required for a good-sized city of 100,000 to 150,000 people. Clearly if this energy were generated on or just off site, a huge environmental impact would be obvious and it would be mandatory to include it in any realistic analysis of the proposed project. However, even if the electrical power is generated elsewhere there will nonetheless be important environmental consequences. This reality must be included in any serious evaluation of the impact of the mine.

There is NO specific response to this concern in the main body of the EIS. The only mention is buried as a response to some citizen comments which state - in essence - that it is too hard to calculate because of the many different possible sources of electrical power.

This is simply not appropriate if this document is to clearly delineate the actual real-life environmental impacts of the proposed project. While it is true that power purchased from the electrical grid could come from many different sources, some sources are much more likely than others. For example, a prime Arizona candidate could be the Springerville Generating Station. It would not be difficult to estimate the amount of additional coal and cooling water required at that facility to generate the necessary electrical power. In fact, this has already been accomplished in the context of oral presentations at public hearings on the proposed mine. Once these basic parameters are quantified the impact of electrical energy production on air quality, water resources and land use could be estimated. The fact that these impacts would occur at some distance from the mine is irrelevant. They are still environmental impacts directly attributable to the mine and they must be evaluated.

The Springerville Generating Station is only one possibility. Clearly the Forest Service should have consulted with Tucson Electric Power about possible sources of electrical power and made some estimate of their impact. However, there is no record in the EIS that demonstrates that TEP has been consulted as to the likely source and environmental impact of that much power generation. Since TEP has surely given some

thought to the problem of providing power to what would be one of their largest customers, this consultation should be a first step and should be clearly documented. Then reasonable options for supplying this huge amount of energy could be reasonably evaluated. This analysis is absolutely essential to give the public and decision makers a realistic picture of the actual environmental impact of the proposed mine.

Reiterating my basic points:

- Huge amounts of electrical energy would be required.
- Most likely scenarios for providing the energy should be identified.
- The impact of these scenarios could and should be analyzed.
- Without this additional analysis, any description of the true environmental impact of the proposed mine is incomplete.

Submitted by

A handwritten signature in black ink, appearing to read "Morris Farr". The signature is fluid and cursive, with a large initial "M" and "F".

Morris Farr, Ph.D

P. O. Box 527

Sonoita, AZ 85637

Telephone: 520-455-9367