

Date February 13, 2014

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

FROM: Ann K. Danowitz  
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RE: Rosemont Copper Project FEIS Objection

I hereby submit a formal objection to the proposed Rosemont Copper project in the Coronado National Forest, Nogales Ranger District. The responsible official is Jim Upchurch.

Issue: Impact on domestic wells.

FEIS Public Concern Statement #314: The Coronado National Forest should not allow the Rosemont Copper Company project to move forward because of the high level and lack of limits of proposed water usage; the scarcity of water (both groundwater and Central Arizona Project water); and the impacts of water depletion on people as well as the natural environment (including impacts to water sources and wildlife, as well as subsidence resulting from the use of groundwater)

In my letter (7621) I expressed concern that the proposed Rosemont Copper mine will affect the underground water resources for residents near the proposed copper mine.

USFS Response in FEIS Chapter 3: In the Groundwater Quantity section of the FEIS the USFS acknowledges that pumping of mine supply water will remove water from the regional aquifer and will lower groundwater levels an additional 1.5 to 3.5 feet to year (for a total decrease of 5 to 10 feet each year). (pp. 291, 317-318.) Further, in the Socioeconomic section it states that the mine supply well field is predicted to impact existing well owners for 100 to 140 years after groundwater pumping begins. The USFS acknowledges that the long term operation of the mine "has the potential to impact domestic wells" and that "drawdowns are likely" and therefore "water availability could be impacted." According to the USFS, affected well owners can mitigate these effects by enrolling in the well owner protection program implemented by Rosemont Copper. However, the USFS further states that "no impacts associated with contamination of groundwater resources are expected." USFS concludes that potential impacts could produce economic and social costs and that from a social perspective, inadequate water supply may cause local residents "uncertainly and discomfort in their current quality of life." (p. 1115)

Objection: While the USFS acknowledges public concern over the absence of analysis on predicted impacts on individual well owners in the DEIS, the USFS did not respond adequately

to those concerns by providing additional analysis in the FEIS. Instead, the USFS continues to avoid the bottom line issue of what are the likely impacts of groundwater pumping by the Rosemont Copper Project on individual home owners, existing businesses, and communities by characterizing impacts as merely “potential”, (i.e., “could reduce groundwater availability”) and by saying that “the information available for most wells remains insufficient for assessing impacts to individual wells.” (FEIS at 291.)

The USFS response to the potential loss of well water to homeowners remains completely inadequate. A real effort must be made to assess the water tables of the affected property owners. Loss of water is not something that may cause uncertainty and discomfort. It will render a property uninhabitable and destroy the economic value of the property. Not only may drawdowns result in homeowner losing water but it may result in their major asset, their home, being rendered worthless. This is far more severe than the USFS’s glib “uncertainty and discomfort in quality of life.”

Action: The USFS must conduct appropriate credible analyses using proper methodology and based on current, accurate data of the effects of well draw downs and loss of water. The Rosemont Copper Project should be required to conduct an inventory of the 500 to 550 individual wells that could be affected by groundwater pumping at the production for the Rosemont Copper Project. The USFS should abandon this version of a FEIS and prepare and circulate for public review and comment a Revised DEIS or Supplemental Draft EIS.

Sincerely

Ann K. Danowitz

Signature file attached