

Final EIS Resolution of CWG Comments on Draft EIS

(prepared by GRA 2/10/21)

DEIS Reference	CWG DEIS Requests & Recommendations	FEIS/ROD Requirements
Socioeconomics		
<p>3.13 & Appendix J Pg. J-23 Socioeconomics and Environmental Justice</p>	<p>Members of the CWG wish to memorialize socioeconomic mitigation agreements through the authority of the EIS process. The CWG requests that the following measures be committed by Resolution Copper Mining and included in the ROD:</p> <ol style="list-style-type: none"> 1.) Continue to extend (as relevant) and negotiate new agreements with the Town of Superior similar to the Agreements detailed in the DEIS to fund specific needs and projects based on mine development and operation impacts. 2.) Establish numeric or percentage targets for local hiring. 3.) Establish numeric or percentage targets for using local suppliers and services. 4.) Agree to further explore the concept of establishing a community fund or foundation to provide long-term support for local projects and initiatives aimed at mitigating mine-related impacts and enhancing the quality of life in the region, in accordance with Rio Tinto’s social license to operate. As suggested by the Town of Superior in its DEIS comments, this foundation should be funded by an endowment sufficient to generate interest income to fund the mitigation not addressed by bonding. The foundation should have an independent board of directors. 5.) Agree to continue conversations and provide funding for feasibility studies for initiatives aimed at preserving the cultural heritage of Superior and the region, including development of a Cultural Heritage and Mining Museum. As envisioned, these initiatives were designed as mitigation for the loss of the historic and culturally-important smelter 	<p>1.) Town of Superior Agreements - This commitment is detailed in measure “RC-SO-06: Agreement with Town of Superior to cover direct costs” in appendix J of the FEIS.</p> <p>The following applicant-committed environmental protection measures have been committed to by Resolution Copper:</p> <ul style="list-style-type: none"> • In February 2019, Resolution Copper entered into an Entrepreneurship and Innovation Center Gift Agreement with the Town of Superior, to fund a number of programs meant to diversify the economic base of the community. • In February 2019, Resolution Copper entered into a Multigenerational Center Development Gift Agreement with the Town of Superior, to help fund the final studies, design, and construction of a multigenerational center. The goal of the center is to improve the overall quality of life for Superior residents, local employers, and their employees, expand the quality of life amenities and services that are essential to retraining and attracting residents and employers, allow for consolidation of Town services and decrease the overall administrative burden of the Town, and further develop public, private, civic, and educational sectors of the community. • In February 2019, Resolution Copper entered into an Education Funding Agreement with the Superior Unified School District, dedicating funding to a

	<p>stack and associated buildings at the West Plant site. Provide funding for development of agreed-upon projects as feasible.</p>	<p>number of classroom enhancements and educational programs over the next 4 years.</p> <ul style="list-style-type: none"> • In February 2019, Resolution Copper entered into a Park Improvement Agreement with the Town of Superior, to fund improvements to the U.S. 60 Caboose Park. • In March 2016, Resolution Copper entered into an Emergency Response Services agreement with the Town of Superior, to fund the provision of fire and other emergency services to the mine facilities by the Town. <p>2. & 3.) Local Hiring & Suppliers Resolution Copper has also committed at a corporate level to hiring qualified candidates locally, with the intention to track employee proximity to the mine, and to using local suppliers and services wherever possible.</p> <p>4.) Community Fund - <i>These activities are detailed in measure "RC-SO-03: Establish a regional economic development entity for Copper Triangle communities" in appendix J of the FEIS.</i> Through investment of an initial endowment, Resolution Copper will develop a sustainable regional economic development entity (or entities) to provide programming and investment in the Copper Triangle communities (Superior, Hayden, Winkelman, and Kearney). This new community-based entity will partner with external organizations, local municipalities, and stakeholders. Specifically, partnerships will be sought with organizations having certain expertise and tools to support and enhance the quality of life in the region, such as strategic planning for economic reinvestment and workforce development.</p>
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		<p>4.) Social Investment – <i>These activities are detailed in measure “RC-SO-04: Resolution Copper social investment program” in appendix J of the FEIS.</i> The Resolution Copper social investment program and corporate giving program have been established to support economic development and enhance quality of life. This includes programs that help create a diverse local business community and programs that help build a healthier and safer community, including parks/pool facilities and schools. Through these programs Resolution Copper has worked with cities, towns, governments, and school districts to fund existing projects, including pool repair and upgrades as well as school programs. These requests are defined and based on the needs of those local municipalities and school districts.</p> <p>4.) Community Working Group – <i>This is detailed in measure “RC-SO-05: Continue funding Community Working Group” in appendix J of the FEIS.</i> Based on regular project budgeting, Resolution Copper plans to continue funding the Community Working Group.</p> <p>5.) Programmatic Agreement - <i>These actions are detailed in measure “FS-SO-01: Community Development Fund” in appendix J of the FEIS.</i> Under the PA, Resolution Copper will establish a fund to be focused on the built environment located within cultural resources area of potential effects. The primary purpose of the fund is to address effects from the project on historic properties and other community infrastructure within the communities of Superior, Miami, Globe, Kearny, Hayden, and Winkelman. All funded projects must comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties, and compliance with these Standards will be determined by SHPO. Specific parameters for the</p>
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		<p>Community Development Fund shall be defined through consultation between Resolution Copper, the applicable administering organization, and SHPO, and must include the following:</p> <ul style="list-style-type: none"> • availability to municipalities, counties, non-profits, private citizens, and private organizations; • preference for projects participating in other historic preservation incentive programs; • preference for projects agreeing to repay funds within 5 years of award, with extensions possible. <p>Purchase or rehabilitation of the Harding building in Superior (a specific suggestion made in public comments) is a project that may be covered by this fund.</p>
<p>3.13 Scope of Analysis</p>	<p>Provide analyses of additional social indicators that are integral to understanding the community impacts of this project. For example:</p> <ul style="list-style-type: none"> • history of mining in the region and how it has shaped Copper Corridor communities • demographic profiles • cultural values • community cohesion • quality of life 	<p><i>The socioeconomic analysis for the EIS was revised to include a more coherent analysis and presentation of many of these factors. Results were presented to the CWG in July 2020.</i></p>
<p>Pg. 653 Boom/Bust Cycle</p>	<p>Provide a more thorough analysis of the Boom/Bust Cycle, outlining other realistic potential scenarios.</p>	<p>“</p>
<p>3.13 Data Tracking</p>	<p>Ensure that topics discussed, and data presented, are consistent and easily tracked from the affected environment sections to the impact sections.</p>	<p>“</p>
<p>3.13 Justification of Conclusions</p>	<p>Explain assumptions and methodologies in the document. Readers should not need to refer to supporting technical documents to understand conclusions.</p>	<p>“</p>

Pg. 655 Property Values	If property values are to be addressed, this section should also include an assessment of positive impacts to property values resulting from the project, if any.	“
Table 13.3-2 Labor Force Characteristics	Provide data on labor force characteristics, along with an analysis of how/whether these might meet employment opportunities and where there are deficiencies.	“
3.13 Educational Programs	Compare the status of local and regional educational structures to the employment needs of the project. Potential ‘feeder’ institutions might include Superior Unified School District, Cobre Valley Institute of Technology, and Central Arizona College.	“
3.13 Good and Services	Discuss the goods and services currently supplied locally and assess deficiencies that might present improved and new business opportunities in future.	“
3.13 Presentation of Data	A summary or comparative table of impacts to the various jurisdictions referenced in the assessment would be useful in helping readers understand the range of impacts.	“
Groundwater Supplies		
Appendix J	<p>1.) All of the monitoring and mitigation measures outlined in the DEIS must be incorporated into the Record of Decision, along with all of the requirements of the Clean Water Act Sec. 404 permit.</p> <p>2.) We also recommend that Resolution Copper Company be required to post bonds or other financial assurances to guarantee compliance with permit and EIS conditions and to remediate any unplanned or residual impacts.</p>	<p>1.) See below – Water Resources</p> <p>2.) cannot find specific reference for this</p>
Pg. J-8 Water Resources RC-211	<p>1.) Replacement of affected residential water-supply wells should be clearly stated as a requirement of this mitigation effort.</p> <p>2.) The CWG requests that the Seeps and Spring Monitoring and Mitigation Plan plan be incorporated in the ROD, along with assurance of funding by Resolution Copper. Mitigation measures should be in place before predicted impacts occurring.</p>	<p>1. & 2.) FS-WR-01: Monitoring and Mitigation Plan for Groundwater Dependent Ecosystems and Water Wells</p> <p>In April 2019, Resolution Copper provided the Forest Service with a document titled “Monitoring and Mitigation Plan for Groundwater Dependent Ecosystems and Water Wells” (Montgomery and Associates Inc. 2019b). This plan was revised and finalized in September 2020 (Montgomery and Associates Inc. 2020b). This</p>

		<p>document outlines a monitoring plan to assess potential impacts on each groundwater-dependent ecosystem (GDE), identifies triggers and associated actions to be taken by Resolution Copper to ensure that GDEs are preserved, and suggests mitigation measures for each GDE if it is shown to be impacted by future mine dewatering. Note that this plan includes actions both for GDEs and water supply wells.</p>
<p>Pg. J-24 & J-27 to 31 Other permits for Water Resources</p>	<p>The CWG believes strongly that impacts should be prevented, not just monitored and mitigated. As an additional enforcement guarantee, we request that the provisions of the APP, AZPDES, Section 401 Certification, and Section 404 Permit be included in the ROD for this project.</p>	<p>2.) Arizona Department of Environmental Quality Water Permits</p> <p>In the GPO and subsequent design documents, Resolution Copper has committed to various measures to reduce impacts on water quality:</p> <ul style="list-style-type: none"> • groundwater levels will be monitored at designated compliance monitoring wells located downstream of the tailings storage facility seepage recovery embankments in accordance with the requirements of the Aquifer Protection Permit program; • all potentially impacted water will be contained on-site during operations and will be put to beneficial use, thereby reducing the need to import makeup water; • stormwater controls (described in detail in section 3.7.2 of the FEIS); • engineered seepage controls (described in detail in section 3.7.2 of the FEIS); • to the extent practicable, stormwater flows upgradient of the facilities will be diverted around the disturbed areas and returned to the natural drainage system; • permanent diversion channels will be designed for operations and closure; and • runoff from roads, buildings, and other structures

		<p>will be handled through best management practices, including sediment traps, settling ponds, berms, sediment filter fabric, wattles, etc.</p> <p>Resolution Copper will be required to obtain two permits from ADEQ: an Aquifer Protection Permit for discharges to groundwater, and a stormwater permit under the Arizona Pollutant Discharge Elimination System, which would include both operational and construction stormwater discharges. The measures described above likely will be required as part of these two permits.</p> <p><i>Compensatory Mitigation under Section 404 Individual Permit</i></p> <p>Resolution Copper has proposed a package of compensatory mitigation as part of the Clean Water Act Section 404 permitting process. This compensatory mitigation is detailed in measure “FS-WR-02: 404 Compensatory Mitigation Plan” in appendix J of the FEIS. This package has been approved by the USACE and is included in appendix D of the FEIS. The three compensatory mitigation parcels approved under the Section 404 permitting process are the MAR-5 Wetland/Olberg Road site, the Queen Creek site, and the H&E Farm site.</p>
Tailings Facility Location, Specifications, and Safety		
<p>Chapter 2 Preferred Tailings Site</p>	<p>A majority of the CWG believes that Alternative 6 is the least objectionable tailings location. However, our member representative from the Town of Winkelman has stated that the town opposes the use of this site and has chosen not to sign this letter for that reason.</p> <p>The CWG recognizes and respects that the communities of Dripping Springs, Kearny, Winkelman and Hayden have only recently been brought into the EIS process and likely</p>	<p><i>Alternative 6 is selected</i></p>

	<p>have varying opinions about this site. Therefore, if Alternative 6 remains the preferred site in the Record of Decision, the CWG requests that USFS and Resolution Copper Mining will take all measures possible to identify and mitigate any public health and safety, water resource, socioeconomic, and quality-of-life impacts of concern to those communities.</p>	
<p>Pg. J-17 Public Health & Safety FS-01</p>	<p>The CWG requests that the same long-term monitoring program outlined here be applied to the Skunk Camp (preferred) tailings facility and that this requirement be incorporated into the ROD so that it is subject to Forest Service oversight. Post-closure monetary assurances should be included here.</p>	<p>Given the location of the tailings storage facility off of Federal land, many of the design and operational features developed to reduce the risk of failure of the tailings storage facility or pipelines are dictated solely by industry best practice. However, the Aquifer Protection Permit that Resolution Copper is required to obtain for the tailings storage facility includes design criteria to which Resolution Copper must adhere. The standards under the Aquifer Protection Permit are described in detail in section 3.10.1 of the FEIS.</p> <p>Resolution Copper has committed to maintaining the existing hotline set up for community complaints via email and telephone, described on the Resolution Copper website. This hotline is meant to provide immediate feedback on any tailings, pipeline, transportation, hazardous material, air quality, or other adverse issues observed by the public. This is detailed in measure “RC-PH-04: Maintain the existing hotline for community complaints” in appendix J of the FEIS.</p> <p>International Council on Mining and Metals (ICMM) member companies will implement the Global Industry Standard as a commitment of membership. Both Rio Tinto and BHP, partners in Resolution Copper, are members of ICMM. Adherence to this standard is detailed in measure “RC-PH-05: Adhere to Global Tailings Standard” in appendix J of the FEIS.</p>

<p>Pg. J-19 and J-20 Public Health & Safety FS-227, 228, 229</p>	<p>The CWG strongly supports development of these plans for the selected tailings site before completion of the FEIS and their inclusion in the ROD.</p>	<p>“</p>
<p>Pg. J-27 Reclamation / Other Plans</p>	<p>The CWG requests that bonding be considered for future mitigation of water resource impacts, if needed.</p>	<p><i>FS-SV-03: Revised Reclamation and Closure Plans</i> The reclamation and closure plan assessed in the DEIS was largely conceptual in nature. Resolution Copper has completed revised reclamation and closure plans, both for the preferred alternative tailings storage facility (KCB Consultants Ltd. 2020c), and as part of the overall mine plan of operations (Tetra Tech Inc. 2020). Aspects of these reclamation and closure plans speak to several specific mitigation suggestions raised in public comments:</p> <ul style="list-style-type: none"> • Public comments suggested that the subsidence area boundary should be fenced off to prevent cattle from entering the area if there is a safety hazard to the mine or the livestock. Access prevention measures to limit public access (including cattle) have been incorporated into the closure and reclamation plan, including a combination of fencing, locked gates, cattle guards, security patrols, and steep topography. • Public comments suggested that comprehensive revegetation plans should be required for the subsidence area, the tailings slurry pipeline corridor, and the tailings facility as part of scenic resources mitigation. Comprehensive reclamation actions have been developed and incorporated into the revised reclamation and closure plans. The reclamation plans cover all mine plan components, including the mine area, subsidence area, tailings corridor, and the tailings storage facility. The reclamation plans include detailed revegetation plans for construction (reclaim and revegetate temporary construction footprints), operations (progressive reclamation of

		<p>the tailings storage facility) and end of mine (closure) revegetation for all disturbance footprints. The revegetation plans incorporate the use of native seed mixes and site preparation, vegetation, monitoring, erosion monitoring, and vegetation reestablishment metrics of success. It is not practical to revegetate the eventual subsidence area because reclamation equipment and personnel to perform the work will not be able to safely access the area.</p> <ul style="list-style-type: none"> • Clarifies activities to be undertaken and conditions for interim shutdown of operations. • Clarifies procedures to be undertaken to calculate financial assurance requirements. <p><i>FS-SV-01: Resource salvage within the tailings storage facility footprint, tailings pipeline/power line corridor, and Oak Flat Federal Parcel</i></p> <p>Resolution Copper would allow natural resource salvage within the Oak Flat Federal Parcel, the tailings storage facility footprint, and the tailings pipeline/power line corridor. This measure would facilitate the salvage of resources (e.g., culturally important plants and mineral resources) to address the loss of access to traditional collection areas and a loss of access to the <i>Chi'chil Bitdagoteel</i> Historic District within the Oak Flat Federal Parcel (selected lands). To the extent practicable and in collaboration and partnership with Tribes, an inventory will be conducted to identify the natural resources within the Oak Flat Federal Parcel area, pipeline corridor, and tailings storage facility footprint. When the inventory is complete, the resources will be "salvaged" (collected) and the material gathered will be distributed amongst the Tribes for traditional and cultural use.</p>
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<p>Chapter 2 Pipeline Route</p>	<p>Please ensure that construction-related impacts of this pipeline corridor are minimized, and that compatible revegetation is completed after construction to minimize visual and habitat impacts.</p>	<p><i>See above - Reclamation</i></p>
<p>Queen Creek and Other Surface Water Resources</p>		
<p>3.7.3 Pg. 422 & Appendix D 5.1.4</p>	<p>1.) The CWG recommends adoption of the Seeps and Spring Monitoring and Mitigation Plan outlined in Appendix J. In addition, we support the Town of Superior’s request for commitment to additional mitigation measures as detailed in their DEIS comment letter (Todd Pryor, October 10, 2019, Water, pages 1-2). These include implementation of the strategies developed in the 1999 <i>Restoration and Management Plan for Queen Creek</i>, subsequent action plans developed by the Town of Superior, and additional items recommended. 2.) Additionally, the CWG requests that the EIS evaluate the potential for diverting existing flows across the subsidence area around or away from this site, to preserve downstream flows, if possible.</p>	<p>1.) FS-WR-04: Replacement of water in Queen Creek Resolution Copper will replace stormwater flow to Queen Creek that has been diverted as a direct result of subsidence. Resolution Copper plans to do so by placing water into Queen Creek above the Magma Bridge and potentially other locations. Queen Creek is a surface resource on portions of the Mesa and Globe Ranger Districts. Precise timing of actual subsidence impacts will depend on timing and sequencing of underground mining. Mitigations for stormwater flow loss to Queen Creek resulting from future subsidence impacts will be incrementally implemented in advance of and concurrent with future subsidence impacts in collaboration with the Town of Superior and other downstream stakeholders with a presence along Queen Creek, in order to offset the actual impacts of future activities. Thus, this mitigation will be supported by a process of baseline data collection to measure impacts. All mitigations involving discharge of replacement water are contingent on successful permitting, including the receipt of an AZPDES permit from ADEQ.</p> <p>2.) PF-WR-02: Divert existing flows across the subsidence area to preserve downstream flows – NOT COMMITTED Public comments suggested that existing flows (surface runoff during storm events) be diverted across the subsidence area in order to preserve downstream flows, if possible. This concept was also raised by Forest Service specialists during the Groundwater Modeling Workgroup</p>

		<p>prior to publication of the DEIS. Rationale for including as a potential future measure: Resolution Copper indicated in their responses to the Forest Service on mitigation suggestions raised in public comments, that to the extent practicable and before subsidence starts, Resolution Copper will evaluate the practicability of implementing diversion around the subsidence area. The majority of upgradient surface runoff that would flow towards the subsidence area would have to pass over the Resolution Copper East Plant Site infrastructure complex which sits between the source and the subsidence area. Minimizing that flow across infrastructure would be accomplished by diverting water around the facility and into Queen Creek and Devil’s Canyon. This would also minimize the amount of flow lost to the subsidence area.</p>
Recreation		
<p>Pg. J-15 & Attachment 1 Recreation RC-214</p>	<p>1.) The CWG believes that the RUG plan is appropriately crafted to serve as a mitigation measure for this project, and strongly urges the Forest Service to incorporate the RUG plan in its entirety into the ROD as partial mitigation for the combined recreational impacts of the project. 2.) Further, we request that Resolution Copper Mining establish an endowment to fund the construction of this trail system and Castleberry campground and partially support long-term maintenance as may be needed. This fund should be managed by a local nonprofit organization. 3.) We also recommend that the campground developed at Castleberry be transferred to management by the Town of Superior.</p>	<p><i>1.) Using the RUG Trail Plan as a starting point of analysis, the Tonto National Forest has developed the Forest Service Multi-Use Trail Plan, which is modified and substantially reduced in mileage. The RUG is in the process of evaluating this plan.</i></p> <p><i>2.) Resolution has committed to funding the Forest Service plan.</i></p> <p><i>3.) The Castleberry Campground is included although management approaches are not yet defined.</i></p>
<p>Pg. J-14 & J-36 Recreation RC-212 & GP-230</p>	<p>1.) For all alternatives, provide details of how the relocated trail would cross the MARRCO rail line. This is particularly important if the rail line is used for tailings transport. 2.) Also, incorporate construction measures into any road crossings, pipeline crossings, or reroutes of the trail to</p>	<p><i>See below – Transportation & Access</i></p>

	minimize impediments to trail use and minimize visual impacts on trail users.	
Additional Recreation Mitigation Measure	The CWG requests that RCM maintain access to the Queen Creek Canyon segment of the Legends of Superior Trail throughout the life of the project. This requires access through the Old Highway 60 tunnel.	<p>PF-RC-03: Fund extension of the Legends of Superior Trails (LOST) Queen Creek segment – NOT COMMITTED</p> <p>Public comments suggested that Resolution Copper fund the extension of the Legends of Superior Trails (LOST) Queen Creek segment south across the base of Apache Leap. Rationale for including as a potential future measure: The Forest Service is already requiring a robust mitigation package to offset recreational impacts (motorized trails, non-motorized trails, and camping). The proposed trail is not identified in the management plan for the Apache Leap Special Management Area and would require additional specific proposals and appropriate NEPA clearance to implement. However, this potential mitigation could be compatible with the long-term regional trail system, including the Forest Service recreational mitigation package (FS-RC-03).</p>
Water Quality		
3.7.2 Pg. 346 Water Quality	We request that Resolution Copper Mining commit to continuing the Community Monitoring Program through development, operation and closure of the mine, and for some reasonable period of time thereafter. We also recommend that the program be modified and expanded as necessary to include water sampling from areas potentially affected by the Skunk Camp tailings site, if this site is selected in the ROD. The Community Monitoring Program should include members from those affected communities.	Cannot find specific reference for this
Visual & Aesthetic / Dark Skies / Noise & Vibration		
3.11.4.2 Pg. 603	Resolution Copper should employ all possible methods to minimize light impacts at their facilities. To the extent possible, this might include the use of focused, downward-pointing lighting that is shielded from surrounding areas.	<p>Applicant-committed environmental protection measures by Resolution Copper include those outlined in the dark skies analysis (Dark Sky Partners LLC 2018):</p> <ul style="list-style-type: none"> • Implement an outdoor lighting

	<p>Dark sky communities such as Flagstaff could serve as resources for appropriate concepts.</p>	<p>plan that would reduce potential impacts from artificial night lighting.</p> <ul style="list-style-type: none"> • Reduce illumination levels where appropriate while still meeting Mine Safety and Health Administration (MSHA) requirements for lighting sufficient to provide safe working conditions. • Adhere to the Pinal County Outdoor Lighting Code. • Use control systems that can turn off lights at particular times of night or are activated by detecting motion while still meeting MSHA requirements for lighting sufficient to provide safe working conditions.
<p>Pg. J-21 Scenic Resources FS-03</p>	<p>Comprehensive revegetation plans should be required for the subsidence crater, the tailings slurry pipeline corridor, and the tailings facility as part of scenic resources mitigation. Such plans are noted as FS-226 for Soils and Vegetation for the tailings facility and should be referenced here and expanded to include the pipeline corridor and subsidence area.</p>	<p><i>See above - Reclamation</i></p>
<p>Pg. J-7 Noise and Vibration RC-218 & Pg. J-25 GP-133</p>	<p>1.) Resolution Copper should negotiate appropriate mitigation with affected residents of Dripping Springs. The CWG asks that noise and vibration mitigation for residences near the tailings facility be incorporated into the Record of Decision (ROD). 2.) The CWG suggests that the proposal to establish a noise complaint phone number or other procedure be adopted.</p>	<p><i>1.) RC-NV-01: Mitigate noise and vibration impacts along Dripping Springs Road</i> Applicant-committed measures to address noise and vibration near the tailings facility specific to the presence of residential areas in Section 29, Township 3 South, Range 15 East, include the following prior to ground-disturbing activities: paving Dripping Springs Road, setting the speed limit to 15 mph, and requiring the deliveries of equipment and materials to occur during the daytime. Resolution Copper has already purchased properties in the footprint and vicinity of the tailings storage facility.</p>

		<p>2.) Resolution Copper has an established hotline for community complaints (including noise and vibration) via email (community-complaint@resolutioncopper.com) and telephone ([520] 689-3955). These are described on the Resolution Copper website (www.resolutioncopper.com).</p>
Traffic & Transportation / Public Services		
<p>Pg. 651-652 Table 3.13.4.2 Table 3.13.4.3 & Pg. J-8 Transportation and Access</p>	<p>1.) Resolution Copper should continue to work with the Town of Superior throughout the project to negotiate payments in compensation for any unrecovered costs associated with mitigating mine-related impacts to streets and public services. 2.) Resolution Copper should provide assurances and funding to repair any local streets damaged by mine-related traffic over the life of the project. 3.) Traffic management plans should be developed and enforced to manage construction-related and operation-related impacts to levels of service on all roads and highways used by mine traffic.</p>	<p>1. & 2.) see above - Socioeconomics</p> <p>3.) FS-TA-01: New Mitigation Aspects of Revised Road Use Plan Resolution Copper revised the road use plan in consultation with the Forest Service in response to comments submitted on the DEIS. Several revised aspects of the Road Use Plan (Resolution Copper 2020b) respond directly to issues raised during comments. Specific new measures in the revised road use plan include:</p> <ul style="list-style-type: none"> • updates to incorporate the preferred alternative; • additional details of road and pipeline crossings; • additional details of the access east of Oak Flat, which was a specific issue raised in public comments; • additional details of management of construction with respect to the Arizona National Scenic Trail; • specific details about how access would be maintained to the extent possible for recreational activities, including hiking, camping, and hunting; and • a change in the location of employee access to the West Plant Site, to reduce impacts within the Town of Superior surface streets.
Overall Ecological Effects on Boyce Thompson Arboretum		
	<p>1.) Monitoring and mitigation measures that protect the resources of the Arboretum should be included in the ROD. 2.) RCM should provide for a secondary water source for the Arboretum to ensure preservation of well water levels and water quality in the event of emergencies.</p>	<p>1.) See above - Groundwater Resources & Surface Water Resources</p> <p>2.) Cannot find specific reference for this</p>

Use of the MARRCO Rail Line		
2.2.6.1 Pg. 81	We suggest that Resolution Copper continue conversations with the CWG and other organizations to further explore the use of the MARRCO rail line for tourism and economic development promotion, possibly resulting in funding for a feasibility study.	<p><i>PF-RC-02: Develop MARRCO corridor for tourism; reactivate rail – NOT COMMITTED</i></p> <p>Reactivating the existing rail line along the MARRCO corridor for tourism is not planned as part of the project. However, approval and construction of the proposed action does not foreclose potential other uses of the corridor in the future after sufficient discussion and analysis to address safety issues. Rationale for including as a potential future measure: Resolution Copper dismissed reactivation of the rail system measure for operational and safety concerns. However, they also noted, “Approval and construction of the proposed action does not foreclose potential other uses of the corridor in the future after sufficient discussion and analysis to address safety issues. Resolution Copper would work with the Town of Superior and other stakeholders if such uses were proposed in the future.”</p>
Location of Filter Plant		
2.2.6.1 Pg. 81	If the filter plant is located in the Town of Superior, we ask that the Forest Service require proper mitigation for noise and light impacts. Further, we ask that RCM make the MARRCO rail line available for use by others and as a tourist train.	<p><i>The filter plant will be located near Florence Junction.</i></p> <p><i>See above – MARRCO Rail Line</i></p>
Livestock Grazing		
J-37	The subsidence area boundary should be fenced off to prevent cattle from entering the area if there is a safety hazard to the mine or the livestock.	<i>See above - Reclamation</i>
Appendix J – Other Mitigation and Monitoring		
Pg. J-1 and J-2 Applicant-committed mitigation	The CWG endorses the applicant-committed mitigation measures listed in the DEIS as being protective of human and environmental health.	(Noted)

Superior Community Working Group Comments

Resolution Copper Project and Land Exchange Draft Environmental Impact Statement



<p>Pg. J-2 and J-3 Mitigation and monitoring required by Forest Service</p>	<p>The CWG is prepared to endorse the Forest Service-required mitigation and monitoring measures outlined in biological and cultural resource regulatory processes.</p>	<p>(Noted)</p>
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