

## Superior Community Working Group Comments

### Resolution Copper Project and Land Exchange Draft Environmental Impact Statement



November 5, 2019

Mr. Neil Bosworth, Supervisor  
Tonto National Forest  
2324 E. McDowell Road  
Phoenix, AZ 85006

RE: Superior Community Working Group Comments  
Draft Environmental Impact Statement for the Resolution Copper Project & Land Exchange

Dear Supervisor Bosworth,

The Superior Community Working Group (CWG) appreciates this opportunity to submit comments on the Draft Environmental Impact Statement (DEIS) for your consideration. The CWG has been deeply involved in the development of this major project for years and has explored every aspect of it in an attempt to educate ourselves and provide a community perspective to Resolution Copper Mining (RCM). The company has supported our work from the beginning, for which we are deeply grateful.

The DEIS has provided a deeper understanding, quantification, and disclosure of the impacts of the project, some of which have been of great concern to this group. In reviewing our public scoping comments, we find that our main concerns still center on the issues we raised at that time. These include:

- Social and economic effects on Superior and the Copper Corridor region
- Groundwater resources
- Tailings facility location, specifications, and safety
- Queen Creek and other surface water resources
- Water quality
- Recreation
- Visual and aesthetic resources, including dark skies and noise and vibration

In addition, the DEIS analyses have prompted a few comments about other issues:

- Traffic and transportation
- Overall ecological effects on Boyce Thompson Arboretum
- Use of the MARRCO rail line
- Location of the filter plant
- Livestock grazing

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The Community Working Group recognizes that this project must be approved by the Forest Service under federal regulations. We also recognize that representatives of Resolution Copper Mining have been attentive to the concerns of the affected communities throughout project planning and have developed extensive voluntary mitigation measures to alleviate some of the impacts of the project. Our primary concern is that these and other adequate and appropriate mitigation measures be put in place and that these measures be memorialized in enforceable, long-term commitments, with funding as appropriate, in the Tonto National Forest Supervisor's Record of Decision.

The CWG would like to thank Tonto National Forest and SWCA staff for their willingness and efforts to discuss the progress of EIS studies with the CWG throughout the study process. The information they have provided has been extremely helpful to us in our deliberations. Likewise, RCM has always responded thoroughly and openly to any information requests we have had, and this information informs our comments on the DEIS. We wish everyone involved in this effort success in assuring that this significant project develops in a community-sensitive, environmentally-responsible manner that can ultimately benefit the people of the region.

Our comments are provided in the following table. Thank you for your consideration of our requests.

Very truly yours,

#### **MEMBERS OF THE SUPERIOR COMMUNITY WORKING GROUP**

*Barbara Armitage* – Superior Historical Society

*Pam Bennett* – Queen Valley Liaison

*Joanne Besich* – Optimist Club of Superior

*Mila Besich* – Town of Superior

*Jeffrey Bunkelmann* – Central Arizona College

*Rick Cartier* – Superior Chamber of Commerce

*Pamela Dalton-Rabago* – Superior Chamber of Commerce

*Cecil Fendley* – Queen Valley Water Improvement District

*Fred Gaudet* – Arizona Trail Association

*Arlynn Godínez* – Superior Unified School District #15

*Hank Gutiérrez* – Copper Community Alliance

*Anthony Huerta* – Town of Superior

*George Martin* – Ranching Community

*Lynn Martin* – Ranching Community

*Richard Matthews* – Queen Valley Water Improvement District

*Lynne Nemeth* – Boyce Thompson Arboretum

*Richard Provencio* – United Superiorites

*Todd Pryor* – Town of Superior

*Tiffany Rowell* – Superior Community

*James Schenck* – Rebuild Superior, Inc. & Legends of Superior Trail

*Fernando Shipley* – Cobre Valley Regional Medical Center

*Silvia Werre* – Resident, Top-of-the-World

*Bruce Wittig* – Queen Valley Fire Department

DEIS Reference	CWG Comments	CWG Requests & Recommendations
<b>Socioeconomics</b>		
<p>3.13 &amp; Appendix J Pg. J-23</p> <p><b>Socioeconomics and Environmental Justice</b></p>	<p>In general, based on the data analyzed in the assessment, it appears that the vast majority of positive socioeconomic impacts from the project will accrue to entities other than local rural Copper Corridor communities directly affected, including to the federal government, State of Arizona, counties, and statewide school districts, while the majority of negative impacts will be felt by the Town of Superior, which borders the project, with anticipated increased costs for municipal services, maintenance and upgrades to local infrastructure, housing and service challenges, and impacts to recreational resources/tourism opportunities. Predicted positive economic impacts to the Town of Superior and Copper Corridor communities calculated by the econometric models are relatively insignificant compared to increased costs. These data may not account for all income or cost factors. We are also concerned that the models used, and predictions resulting from them, do not consider the economic and social hardship realities of Copper Corridor communities and may be weighted to other rural communities that are not in the shadows of active mining and development.</p> <p><b>No mitigation is outlined</b> for socioeconomic and environmental justice impacts. These issues are of paramount importance to the communities directly affected by the project. Rio Tinto’s “social license to operate” policies and practices have historically provided mitigation and compensation for negative impacts, and we recognize that the company has been working with the community in developing compensatory measures. The CWG established a subcommittee to investigate the options and details of establishing a community fund, trust, or other independent funding mechanism to support the socioeconomic initiatives of the region, as compensation for mine-related impacts. These discussions were suspended while negotiations occurred for specific agreements, as outlined in the DEIS; we hope that this initiative will be explored further by RCM and Rio Tinto.</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"> <li>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.</li> <li>2.) Establish numeric or percentage targets for local hiring.</li> <li>3.) Establish numeric or percentage targets for using local suppliers and services.</li> <li>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.</li> <li>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 stack and associated buildings at the West Plant site. Provide funding for development of agreed-upon projects as feasible.</li> </ol>

<p>3.13 Scope of Analysis</p>	<p><b>This assessment is focused on external economic impacts</b> of the project but fails to address the specific internal social aspects of Copper Corridor communities that would help to explain the “human” impacts of this giant endeavor. The history of this region is integral to the way local communities view this project. Many current residents were themselves miners and come from a long history of mining families. Some of the public skepticism and mistrust of large and foreign mining companies has been shaped by their experiences, and these are important issues that Resolution Copper Mining is working to overcome. As well, the demographic profile of the affected communities speaks to the importance of their cultural heritage and has helped to shape their values. Not only the economic conditions of the communities but their social conditions will shape the ways in which they are able to respond to the challenges of the Resolution Copper Project. These types of assessments are particularly important since the affected areas have been defined as Environmental Justice communities.</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"> <li>• history of mining in the region and how it has shaped Copper Corridor communities</li> <li>• demographic profiles</li> <li>• cultural values</li> <li>• community cohesion</li> <li>• quality of life</li> </ul>
<p>Pg. 653 Boom/Bust Cycle</p>	<p>Related to the comments above, the superficial way in which the boom/bust cycle is presented in this section is insufficient to understand the real impacts of this potential, which has been experienced by current residents of Superior and the Copper Corridor in their lifetimes. Clearly, this region is and has been vulnerable to boom/bust cycles. Simply trusting that Resolution Copper will continue to maintain profitability, that world copper prices will hold favorably, and that the parent companies Rio Tinto and BHP will prioritize this project is only one possible scenario. Others should be explored.</p>	<p>Provide a more thorough analysis of the Boom/Bust Cycle, outlining other realistic potential scenarios.</p>
<p>3.13 Data Tracking</p>	<p>In some cases, affected environment discussions and impact analyses are not the same; for example, visitor spending and Tonto National Forest visitation are discussed but impacts are described by AGFD wildlife-related recreation.</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>3.13 Justification of Conclusions</p>	<p>Conclusionary statements are made in several cases without an explanation of how they were arrived at. For example, page 651 states, “The proposed mine would also produce substantial revenues for the federal government, estimated at more than \$200</p>	<p>Explain assumptions and methodologies in the document. Readers should not need to refer to supporting technical documents to understand conclusions.</p>

	million per year”, orders of magnitude greater than any other jurisdiction – the source of this revenue should be explained.	
Pg. 655 Property Values	There is a stated reduction in property values of about 4% in a 5-mile radius of the tailings facility; since it is highly unusual to attempt to quantify property value impacts, the source and methodology for these assumptions should be clarified. One source of possible “comparables” might historical property values in the communities of Tubac and Sahuarita adjacent to Freeport McMoran’s Sierrita Operations south of Tucson.	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	There is no analysis of labor force characteristics in Superior and the Copper Corridor. Since Resolution Copper has committed to hiring local labor (in a skilled labor desert) to the extent possible, detail on labor force characteristics would help to identify the realistic labor pool as well as future educational needs to satisfy mine requirements.	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	There is no discussion of local educational programs – current and planned – that are or may be designed to meet the employment needs of the mine. Resolution Copper has undertaken support for certain educational programs, and these should be outlined. One suggestion made by CWG members is a program to underwrite the Superior Junior-Senior High School to become a public “magnet school” offering special instruction and programs not available elsewhere, designed to attract a more diverse student body throughout a school district.	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	There is no discussion of available retail, wholesale and other suppliers of goods and services that may support the mine. Resolution Copper currently obtains a high percentage of these from non-local suppliers but has committed to using local sources in future, to the extent possible.	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	Data and discussions supporting conclusions are scattered throughout the section, are difficult to track, in some cases appear to be inconsistent.	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	The CWG has explored issues surrounding groundwater supplies for the Resolution Copper Project and potential impacts caused by the project for several years, by speaking with representatives of the Arizona Department of Water Resources, water attorneys and other independent experts, and Resolution Copper Company. Members consider this to be a highly significant impact of this project, both locally as it may affect drinking water supplies and statewide as it affects the balance between agricultural and industrial water uses and availability of CAP water to all entities. Uncertainties surrounding the longstanding drought in Arizona and on the Colorado River add to these concerns.	<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>
Pg. J-8 <b>Water Resources</b> RC-211	The Seeps and Spring Monitoring and Mitigation Plan seems appropriate. As written, however, this summary emphasizes mitigation measures for GDEs. Water supply wells are also predicted to be affected by the project, and it should be made clear that these supplies will be replaced as necessary.	<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 this 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>
Pg. J-24 & J-27 to 31 <b>Other permits for Water Resources</b>	One issue that has concerned members of the CWG relative to water resource protection is the performance of Arizona regulatory agencies (Department of Water Resources, Department of Environmental Quality) in enforcing their requirements. Permit violations rarely result in meaningful actions such as facility shut-down. The CWG wishes to ensure that there is comprehensive enforcement of permit exceedances and violations.	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.
Tailings Facility Location, Specifications, and Safety		
Chapter 2 <b>Preferred Tailings Site</b>	The CWG has been involved in selecting and evaluating the applicant-proposed tailings site, Alternative 2, Near West, since its inception. The composition of group membership has been tailored to include those who may be affected by this site. The CWG has many concerns about this site related to visual impacts on the Boyce Thompson Arboretum, local residents, nearby communities and visitors; recreation impacts to the extensive OHV use of the area and significant effects on the Arizona National Scenic Trail; and	<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</p>

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	<p>potential groundwater and surface water pollution. With the exception of alternatives located on State Trust Land near Florence Junction and at Pinto Valley Mine, which proved infeasible, the CWG felt that this site was the best alternative. However, the late inclusion of the Skunk Camp site, Alternative 6, was welcomed by most CWG members as avoiding some of the major impacts of the Near West location.</p> <p>The Skunk Camp site, while more remote from some communities, may be of concern to those other communities who now find themselves in proximity. Consequently, the CWG has attempted to expand its membership to include representatives from Kearny, Winkelman, and Gila County. We have not spoken with residents of Dripping Springs nor are they represented on the CWG, so their concerns are unknown to us. As we understand it, local communities to this site are particularly worried about potential water resource and quality impacts of the tailings facility, due to its location upstream of the Gila River and the serious water supply problems currently experienced in this region. Because there is limited housing and service availability in these small communities, they feel that they will not benefit economically from this facility. There is also a perception that “enough is enough”, as these communities have been living with the Asarco Ray Mine for generations.</p>	<p>only recently been brought into the EIS process and likely 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 <b>Public Health &amp; Safety</b> FS-01</p>	<p>Monitoring of the tailings facility will be critical to ensure protection of human life, property, and downstream resources.</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>Pg. J-19 and J-20 <b>Public Health &amp; Safety</b> FS-227, 228, 229</p>	<p>The proposed tailings facility mitigation measures of a failure modes and effects analysis, adherence to National Dam Safety standards, and development of an emergency action plan are critical in ensuring both public safety and public confidence in RCM.</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>

Pg. J-27 <b>Reclamation / Other Plans</b>	Financial bonding for mine reclamation is necessary. Bonding for other components of the project – most notably for mitigation of surface and groundwater quantity and quality impacts – would provide assurances for public health and safety.	The CWG requests that bonding be considered for future mitigation of water resource impacts, if needed.
Chapter 2 <b>Pipeline Route</b>	Two alternative pipeline routes are evaluated to serve the Skunk Camp tailings site. The CWG prefers the Forest Service’s proposed northern route, only because it avoids the area included in the Recreation User Group trail plan shown in Appendix J. We are, however, concerned about possible impacts to Devil’s Canyon from this route.	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.
<b>Queen Creek and Other Surface Water Resources</b>		
3.7.3 Pg. 422 & Appendix D 5.1.4	Most of the members of the CWG have a stake in or are concerned about flows in Queen Creek and other surface water resources that would be affected by the mining project. These concerns include regional water availability, water quality, aquatic and biotic communities, and recreation and tourism.	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>
<b>Recreation</b>		
Pg. J-15 & Attachment 1 <b>Recreation</b> RC-214	The Recreation User Group (RUG), a subcommittee of the CWG, spent nearly 4 years in a collaborative effort, along with Tonto National Forest representatives, to develop a multi-use trail plan for the area southwest of the Town of Superior. This plan was intended to coordinate the individual efforts and requests of various recreation user groups, who have all participated in developing a plan that can accommodate both motorized and nonmotorized users and includes a campground. The plan has been field-verified for implementability, and participating user groups stand ready to	<ol style="list-style-type: none"> <li>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.</li> <li>2.) Further, we request that Resolution Copper Mining establish an endowment to fund the construction of this trail system and Castleberry campground and partially</li> </ol>

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	<p>support both implementation and long-term maintenance through volunteer efforts. However, an assured source of funding will also be required through grants, sponsors, and others. Resolution Copper is offering this plan as mitigation for recreation impacts of the mining project and would therefore be an important potential funding source.</p> <p>As presented in the DEIS, recreation impacts associated with the combination of Oak Flat and tailings Alternative 6 Skunk Camp include the loss of 38 miles of recreational roads, 1,282 acres of area available for camping, 1,457 hunter days (along with the loss of scenic values to visitors), and loss of rock climbing access and opportunity in this significant location. The Near West tailings alternatives would also have similar impacts in addition to significant effects on the Arizona National Scenic Trail.</p> <p>In addition to direct mitigation for project-related impacts the RUG plan has the potential for attracting regional and even national visitor use due to its unique scenic qualities and connections to other important recreation resources such as the Arizona Trail and Legends of Superior Trail, the Boyce Thompson Arboretum, and the services available in the Town of Superior. Implementation of this plan would provide an important economic development opportunity and anchor to the town and the region.</p>	<p>support long-term maintenance as may be needed. This fund should be managed by a local nonprofit organization.</p> <p>3.) We also recommend that the campground developed at Castleberry be transferred to management by the Town of Superior.</p>
<p>Pg. J-14 &amp; J-36 <b>Recreation</b> RC-212 &amp; GP-230</p>	<p>Elements of the project will negatively affect the Arizona National Scenic Trail in combination with any alternative tailings site. These will be detailed in comments from the Arizona Trail Association.</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.</p> <p>2.) Also, incorporate construction measures into any road crossings, pipeline crossings, or reroutes of the trail to minimize impediments to trail use and minimize visual impacts on trail users.</p>
<p>Additional Recreation Mitigation Measure</p>	<p>The Old Highway 60 Tunnel is an integral part of the Legends of Superior Trail (LOST). Safety concerns about this tunnel have prompted RCM to initiate improvements as an alternative to closing public access to the tunnel. We endorse this approach.</p>	<p>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>

Water Quality		
3.7.2 Pg. 346 <b>Water Quality</b>	Under the auspices of Resolution Copper Mining, the CWG operates an independent water quality sampling program of several wells to establish baseline conditions and monitor future impacts of mine discharges.	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.
Visual & Aesthetic / Dark Skies / Noise & Vibration		
3.11.4.2 Pg. 603	The Town of Superior has taken measures to promote and maintain a dark-sky environment. The mine is projected to cause increased luminescence to the town, the Boyce Thompson Arboretum, and communities surrounding Oak Flat.	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. Dark sky communities such as Flagstaff could serve as resources for appropriate concepts.
Pg. J-21 <b>Scenic Resources</b> FS-03	The proposed mitigation measures relate only to a project-related transmission line. Of far greater magnitude are the impacts of the mine subsidence crater and the tailings facility that will irreversibly alter the form, line, color, and texture of the landscape, regardless of limited views of these due to restrictions on public access. The tailings pipeline corridor is also not addressed.	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.
Pg. J-7 <b>Noise and Vibration</b> RC-218 & Pg. J-25 GP-133	Impacts to residences near the selected tailings facility should be mitigated. In the case of Skunk Camp, an alternative access road alignment may be appropriate. Purchase of affected properties may also be considered.  Establishing a noise complaint procedure is appropriate.	<ol style="list-style-type: none"> <li>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).</li> <li>2.) The CWG suggests that the proposal to establish a noise complaint phone number or other procedure be adopted.</li> </ol>

Traffic and Transportation, Public Services		
<p>Pg. 651-652 Table 3.13.4.2 Table 3.13.4.3 &amp; Pg. J-8 <b>Transportation and Access</b></p>	<p>It is very difficult to understand the data and discussion of projected municipal revenues and costs as presented here. However, it appears that the Town of Superior will experience increased costs for street maintenance and services that are roughly equal to increased income.</p>	<p><b>1.)</b> 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. <b>2.)</b> Resolution Copper should provide assurances and funding to repair any local streets damaged by mine-related traffic over the life of the project. <b>3.)</b> 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>
Overall Ecological Effects on Boyce Thompson Arboretum		
	<p>The Arboretum is a special and valuable place, both from an ecological and an economic standpoint. It represents a unique resource in the region whose qualities should be maintained. Mine-related impacts to biological resources, water supplies and quality, scenic resources, traffic, and other effects should be mitigated appropriately.</p>	<p><b>1.)</b> Monitoring and mitigation measures that protect the resources of the Arboretum should be included in the ROD. <b>2.)</b> 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>
Use of the MARRCO Rail Line		
<p>2.2.6.1 Pg. 81</p>	<p>As part of its focus on cultural heritage and support for economic diversification of the region, the CWG would like to explore the possibility of using the MARRCO rail line for a tourist train. In discussing this with Resolution Copper, the group realizes that this would be a costly and complicated effort. However, if the rail line will be used to transport materials from Superior to the remote filter plant site, we hope that a co-use could be investigated.</p>	<p>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>
Location of the Filter Plant		
<p>2.2.6.1 Pg. 81</p>	<p>The CWG does not have particular preferences for either filter plant location, except that members of the group have seen the restoration of the MARRCO rail line as a potential opportunity to establish a 'tourist train' to bring visitors to Superior. However, we understand that the Town of Superior would like to have the plant located in town.</p>	<p>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>

<b>Livestock Grazing</b>		
J-37	There are livestock water tanks located at the edge of the subsidence area boundary line.	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.
<b>Appendix J – Other Mitigation and Monitoring</b>		
Pg. J-1 and J-2 <b>Applicant-committed mitigation</b>	Mitigation measures are appropriate and responsive to community concerns.	The CWG endorses the applicant-committed mitigation measures listed in the DEIS as being protective of human and environmental health.
Pg. J-2 and J-3 <b>Mitigation and monitoring required by Forest Service</b>	Mitigation developed through a USFWS Biological Opinion and Arizona SHPO Programmatic Agreement for cultural resources will address impacts to these resources. The CWG is not able to assess whether these mitigation measures will satisfy involved stakeholders.	The CWG is prepared to endorse the Forest Service-required mitigation and monitoring measures outlined in biological and cultural resource regulatory processes.