



Forest Service
U.S. DEPARTMENT OF AGRICULTURE

Tonto National Forest

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Resolution Copper Project and Land Exchange Errata to Final Environmental Impact Statement



Coconino, Gila, Maricopa, Pinal, Santa Cruz, and Yavapai Counties, Arizona

Resolution Copper Project and Land Exchange Final Environmental Impact Statement

Errata Sheet

The Resolution Copper Project and Land Exchange Final Environmental Impact Statement (EIS) was released on June 20, 2025. Publication of the Final EIS (FEIS) and draft ROD initiated the public pre-decisional objection process under 36 Code of Federal Regulations (CFR) 218, which concluded on October 20, 2025. This errata sheet documents corrections to the text of the published FEIS and should be reviewed along with the published FEIS. On October 20, 2025, the Reviewing Official issued objection response letters (Appendix C) that included instruction for the Tonto National Forest to make several clarifications and corrections in the final ROD and/or in an errata to the FEIS (it was determined that a supplement or revision of the Resolution Copper Project and Land Exchange Final Environmental Impact Statement was not necessary). This errata sheet documents the corrections to the text of the published FEIS based on the objection response letter. These corrections are consistent with direction given in Forest Service Handbook 1909.15, Chapter 10, Section 18. There are no changes to the project or significant new circumstances identified in this errata sheet that affect the analysis and conclusions in the Resolution Copper Project and Land Exchange Final Environmental Impact Statement.

The sections in **bold** in this appendix identify the updates to the FEIS: ~~strikethrough~~ identifies deleted text, and underline identifies added text.

Forest Plan Amendment

As a result of the pre-decisional objection process, the Reviewing Official determined that one additional desired condition required a project-specific exception to the forest plan: TRB-DC-01, “Locations identified as important by American Indian Tribes are acknowledged, and there is an emphasis on the resilience and protection of natural and cultural resources and on preserving the character and use of these places.” **The following updates relate to adding this additional desired condition to the forest plan amendment.**

Page 17, Section 1.4.3, “Forest Plan Amendment” – This section is updated as follows: While the forest plan components included in an amendment differ by alternative, they generally include forest plan components intended to protect soil productivity, scenic resources, national scenic trails, recreation resources, wildlife habitat, ~~and~~ cultural resources, and Tribal relations and areas of Tribal importance.

Page 18, Table 1.4.3-1, Section 1.4.3, “Forest Plan Amendment” – This section is updated as follows:

- New row added: Tribal Relations and Areas of Tribal Importance Desired Condition 01 (TRB-DC-01) (forest plan, p. 58)
- All alternatives would be marked not consistent
- New footnote added: Note: TRB-DC-01 was included in the forest plan amendment after consideration of comments received during the pre-decisional objection review process.

Page 51, Section 2.1.2, “Changes from the January 2021 Rescinded FEIS” – This section is updated as follows: New footnote added: Note that one desired condition (TRB-DC-01) was included in the forest plan amendment after consideration of comments received during the pre-decisional objection review process.

Page 101, Section 2.2.4.4, “Forest Plan Amendment for Alternative 2” – This section is updated as follows: This project-specific amendment would except ~~24-25~~ forest plan desired conditions and guidelines associated with soil productivity, scenic resources, national scenic trails, recreation resources, wildlife habitat, ~~and cultural resources, and Tribal relations and areas of Tribal importance~~ (see table 1.4.3-1). Approval of this amendment would except the project actions in Alternative 2 from compliance with these ~~24-25~~ forest plan desired conditions and guidelines in the project area.

Page 115, Section 2.2.6.2, “Forest Plan Amendment for Alternative 4” – This section is updated as follows: This amendment would except ~~25-26~~ forest plan desired conditions and guidelines associated with soil productivity, scenic resources, national scenic trails, recreation resources, wildlife habitat, ~~and cultural resources, and Tribal relations and areas of Tribal importance~~ (see table 1.4.3-1). This amendment would except the project actions of Alternative 4 from compliance with these ~~25-26~~ forest plan desired conditions and guidelines in the project area.

Page 122, Section 2.2.7.2, “Forest Plan Amendment for Alternative 5” – This section is updated as follows: This amendment would except ~~46-17~~ forest plan desired conditions and guidelines associated with soil productivity, scenic resources, national scenic trails, recreation resources, wildlife habitat, ~~and cultural resources, and Tribal relations and areas of Tribal importance~~ (see table 1.4.3-1). This amendment would except the project actions of Alternative 5 from compliance with these ~~46-17~~ forest plan desired conditions and guidelines in the project area.

Page 132, Section 2.2.8.2, “Forest Plan Amendment for Alternative 6” – This section is updated as follows: This amendment would except the same ~~46-17~~ forest plan desired conditions and guidelines as the amendment under Alternative 5.

Page 885, “Effects of Forest Plan Amendment,” under Section 3.14.4.2, “Impacts Common to All Action Alternatives” – This section is updated as follows: Replace section in its entirety.

~~No components of the 2023 forest plan directly relate to Tribal values and concerns that require amendment. However, a great number of forest plan components are related to resources considered important or sacred by Tribes, including wildlife, water resources, and scenic resources. The need for a forest plan amendment for these resources is discussed in the appropriate section.~~

The 2023 “Tonto National Forest Land Management Plan” provides guidance for management of lands and activities on the Tonto National Forest. Plan components guide project and activity decision-making and are required in the forest plan. They include desired conditions, objectives, standards, guidelines, and suitability of lands (U.S. Forest Service 2023d:15-17).

A review of all components of the 2023 forest plan was conducted to identify the need for amendment due to the effects of the project (SWCA Environmental Consultants 2025). The review determined that each of the action alternatives would be inconsistent with one desired condition for Tribal relations and areas of Tribal importance: TRB-DC-01 (see table 1.4.3-1). A plan amendment would be required for each action alternative that would except the alternative from complying with this desired condition.

Desired condition TRB-DC-01 states, “Locations identified as important by American Indian Tribes are acknowledged, and there is an emphasis on the resilience and protection of natural and cultural resources and on preserving the character and use of these places.”

While locations identified as important by Tribes are identified in this section and in appendix U, none of the alternatives are able to avoid these areas entirely, even when excluding those areas and project components that would not ultimately be on NFS land or under the management

direction of the forest plan, such as the Oak Flat Federal Parcel (after exchange) and the Alternative 5 or 6 tailing storage facilities. For example, for Alternative 6, the pipeline/transmission line corridor must cross areas of Tribal importance such as Devil’s Canyon (also known as Ga’an Canyon). While these corridors have been sited to minimize resource impacts and incorporate applicant-committed environmental protection measures and mitigation that would reduce resource impacts to wildlife, cultural resources, and scenery, they would still change the character and use of areas of Tribal importance.

The effect of the exception of this desired condition includes adverse effects on wildlife, scenery, and cultural resources that differ by alternative. The effects from the exception of desired conditions and guidelines associated with these resources is described in section 3.8 (wildlife, discussing exceptions for up to four desired conditions and guidelines, varying by alternative), section 3.11 (scenery, discussing exceptions for up to seven desired conditions and guidelines, varying by alternative), and section 3.12 (cultural resources, discussing exceptions for three desired conditions).

Page T-1, Appendix T, “Tonto National Forest Land Management Plan,” under “Introduction” – This appendix is updated as follows: The Resolution Copper Project preferred alternative (Alternative 6 – Skunk Camp) proposes a multicomponent forest plan amendment that would except the Resolution Copper Project from nine guidelines and ~~seven-eight~~ desired conditions.

Page T-2, Appendix T, “Forest Plan Amendment Process and Compliance with 2012 Planning Rule,” under “Introduction” – This appendix is updated as follows: A review of the Resolution Copper Project FEIS in relation to the December 2023 “Tonto National Forest Land Management Plan” indicated that the preferred alternative, as proposed, cannot adhere to nine forest plan guidelines and ~~seven-eight~~ forest plan desired conditions that are intended to protect soil productivity, scenic resources, national scenic trails, recreation resources, wildlife habitat, ~~and cultural resources, and Tribal relations and areas of Tribal importance.~~

Page T-3, Appendix T, “Scope and Scale of the Amendment,” under “Introduction” – This appendix is updated as follows: The scope of this proposed project-specific amendment is the exception of nine forest plan guidelines and ~~seven-eight~~ forest plan desired conditions for the Resolution Copper Project for the duration of the project.

Page T-4, Appendix T, “Purpose of the Amendment,” under “Introduction” – This appendix is updated as follows: As mentioned, the Resolution Copper Project preferred alternative, as proposed, cannot adhere to nine forest plan guidelines and ~~seven-eight~~ forest plan desired conditions.

Pages T-4 and T-5, Appendix T, “Step 1: Determine the Plan Components to Be Excepted” – This appendix is updated as follows: After reviewing the forest plan, the responsible official determined the Resolution Copper Project preferred alternative, as proposed, would be inconsistent with nine guidelines and ~~seven-eight~~ desired conditions in the forest plan. The Forest Service proposes a project-specific amendment to except the Resolution Copper Project from the nine guidelines and ~~seven-eight~~ desired conditions to meet the requirement that the Resolution Copper Project be consistent with the forest plan. The proposed amendment would except the Resolution Copper Project from complying with the nine guidelines and ~~seven-eight~~ desired conditions, which would apply to 2,502 acres of NFS land that would be disturbed by the preferred alternative

(preferred alternative area of disturbance).

Page T-5, Appendix T, “Step 1: Determine the Plan Components to Be Excepted” –

This appendix is updated as follows: Insert this bullet point after the cultural and historic resources (CUH) bullets:

- **Tribal Relations and Areas of Tribal Importance Desired Condition 01 (TRB-DC-01) - Locations identified as important by American Indian Tribes are acknowledged, and there is an emphasis on the resilience and protection of natural and cultural resources and on preserving the character and use of these places (forest plan, p. 58).** While the route is designed to minimize resource impacts, and there are applicant-committed environmental protection measures and mitigation that would reduce impacts to wildlife, scenery, and cultural resources, the pipeline, electrical transmission lines and associated infrastructure constructed and operated with the preferred alternative cannot avoid areas of Tribal importance, including Devil’s Canyon (also known as Ga’an Canyon), and would change the character and use of these places.

Page T-7, Appendix T, “Step 2: Determine Directly Related Substantive

Requirements” – This appendix is updated as follows: The scope of this proposed project-specific amendment is defined as the nine guidelines and ~~seven-eight~~ desired conditions that would not be met if the Resolution Copper Project preferred alternative were implemented and the exception of the Resolution Copper Project from ~~of those~~ nine guidelines and ~~seven-eight~~ desired conditions.

Page T-22, Appendix T, new section, “Tribal Relations and Areas of Tribal Importance,” under “Step 2: Determine Directly Related Substantive

Requirements” – This appendix is updated as follows: Add entirely new “Tribal Relations and Areas of Tribal Importance” section after “Cultural Resources” section.

Tribal Relations and Areas of Tribal Importance

One forest plan desired condition associated with Tribal relations and areas of Tribal importance is proposed to be excepted in this amendment: TRB-DC-01.

- TRB-DC-01 requires that locations identified as important by American Indian Tribes are acknowledged and requires an emphasis on the resilience and protection of natural and cultural resources and on preserving the character and use of these places. While the route is designed to minimize resource impacts, and there are applicant-committed environmental protection measures and mitigation that would reduce impacts to wildlife, scenery, and cultural resources, the pipeline, electrical transmission lines and associated infrastructure constructed and operated with the preferred alternative cannot avoid areas of Tribal importance, including Devil’s Canyon (also known as Ga’an Canyon), and would change the character and use of these places.

It is not practical to modify the Resolution Copper Project location or construction methods in a manner that would achieve consistency with this desired condition. Therefore, the Forest Service proposes to except the Resolution Copper Project from this desired condition.

Purpose - The purpose of excepting desired condition TRB-DC-01 is to allow the Resolution Copper Project to exceed one of the five forest-wide desired conditions for Tribal relations and areas of Tribal importance. The modification of these desired conditions is directly related to § 219.8(a)(b) – social and economic sustainability – cultural and historic resources and uses; § 219.8(a)(1)(i) – ecosystem integrity, interdependence of terrestrial and aquatic ecosystems in the plan area; § 219.9(a)(2)(i) – ecosystem diversity, key characteristics associated with terrestrial and aquatic ecosystem types; § 219.10(a)(1) – integrated resource management for multiple use – cultural and heritage resources; § 219.10(b)(1)(ii) – protection of cultural and historic resources;

and § 219.10(b)(1)(i) – sustainable recreation, including recreation setting, opportunities, access; and scenic character.

Effects - The effect of the exception of desired condition TRB-DC-01 includes adverse effects on wildlife, scenery, and cultural resources. The reduction in protection measures for these resources constitutes an adverse impact, but effects are not expected to be substantial. See subsections under Step 2 for “Scenic Resources—Scenic Integrity Objectives,” “Wildlife Habitat—Connectivity and Movement,” and “Cultural Resources” for this analysis.

Page T-22, Appendix T, “Directly Related Substantive Requirements,” under “Step 2: Determine Directly Related Substantive Requirements” – This appendix is updated as follows [note: only the bullets that have revisions are included below]:

- § 219.10(b)(1)(i) – Sustainable recreation due to the exception of desired conditions TRB-DC-01, SC-DC-03, NTMA-DC-06, and NTMA-DC-07 and guidelines SC-G-01, SC-G-03, NTMA-G-01, and NTMA-G-08 (Scenic Integrity Objectives); desired condition NTMA-DC-03 and guideline NTMA-G-01 (Arizona National Scenic Trail); and guideline REC-G-10 (Recreational Opportunity Spectrum).
- § 219.8(a)(1)(i) – Ecosystem integrity, interdependence of terrestrial and aquatic ecosystems in the plan area due to exception of desired condition TRB-DC-01 and guidelines REC-WR-G-03, WFP-G-06, and WFP-G-07.
- § 219.9(a)(2)(i) – ecosystem diversity, key characteristics associated with terrestrial and aquatic ecosystem types due to the exception of desired condition TRB-DC-01 and guidelines REC-WR-G-03, WFP-G-06, and WFP-G-07.
- § 219.8(a)(b) – social and economic sustainability – cultural and historic resources and uses due to the exception of desired conditions CUH-DC-01, CUH-DC-02, ~~and~~ CUH-DC-07, and TRB-DC-01.
- § 219.10(a)(1) – Integrated resource management for multiple use – cultural and heritage resources due to the exception of desired conditions CUH-DC-01, CUH-DC-02, ~~and~~ CUH-DC-07, and TRB-DC-01.
- § 219.10(b)(1)(ii) – protection of cultural and historic resources due to the exception of desired conditions CUH-DC-01, CUH-DC-02, ~~and~~ CUH-DC-07, and TRB-DC-01.

Page T-23, Appendix T, “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: new bullet added to bulleted list of forest plan components that would be excepted.

- One of five forest-wide desired conditions for Tribal relations and areas of Tribal importance.

Page T-24, Appendix T, “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: new bullet added to bulleted list of forest plan components that would be unchanged.

- Tribal Relations and Areas of Tribal Importance – four desired conditions, five guidelines, and four standards.

Page T-24, Appendix T, “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Through actions that require adherence to State standards and practices, actions that avoid or mitigate erosion, and practices that require restoration, these unexcepted desired conditions, guidelines, objectives, and standards would continue to maintain or restore terrestrial ecological integrity, soils and soil productivity, scenery, riparian areas, recreation, wildlife habitat, cultural resources, Tribal relations and areas of Tribal importance, and ecosystem diversity.

Pages T-25 and T-26, Appendix T, “Section 219.10(b)(1)(i) – Sustainable Recreation,

Including Recreation Setting, Opportunities, Access; and Scenic Character,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Substantive requirement § 219.10(b)(1)(i) – sustainable recreation, including recreation setting, opportunities, access; and scenic character is directly related to the proposed amendment through the purpose of excepting the following: desired conditions SC-DC-03, NTMA-DC-06, and NTMA-DC-07 and guidelines SC-G-01, SC-G-03, NTMA-G-01, and NTMA-G-08 (Scenic Integrity Objectives); desired condition NTMA-DC-03 and guideline NTMA-G-01 (Arizona National Scenic Trail); desired condition TRB-DC-01 (Tribal Relations and Areas of Tribal Importance); and guideline REC-G-10 (Recreational Opportunity Spectrum). Note that TRB-DC-01 is not directly related to recreation or scenery, but the exception of this desired condition allows the placement of infrastructure in areas of Tribal importance, affecting the character of those areas.

Page T-26, Appendix T, “Scope,” under “Scenic Resources—Scenic Integrity Objectives,” under “Section 219.10(b)(1)(i) – Sustainable Recreation, Including Recreation Setting, Opportunities, Access; and Scenic Character,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: The scope of this component of the project-specific amendment is the exception of the following: desired conditions SC-DC-03, NTMA-DC-06, and NTMA-DC-07, and TRB-DC-01 and guidelines SC-G-01, SC-G-03, and NTMA-G-08 as they are applied to the Resolution Copper Project preferred alternative area of disturbance.

Page T-26, Appendix T, “Application,” under “Scenic Resources—Scenic Integrity Objectives,” under “Section 219.10(b)(1)(i) – Sustainable Recreation, Including Recreation Setting, Opportunities, Access; and Scenic Character,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Excepting the Resolution Copper Project from adhering to these ~~three~~four desired conditions and three guidelines would have an adverse impact on the scenery resource.

Pages T-26 and T-27, Appendix T, “Application,” under “Scenic Resources—Scenic Integrity Objectives,” under “Section 219.10(b)(1)(i) – Sustainable Recreation, Including Recreation Setting, Opportunities, Access; and Scenic Character,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: The ~~three~~four excepted desired conditions and three excepted guidelines would continue to apply to 99.9 percent of the Tonto National Forest.

Page T-30, Appendix T, “Section 219.8(a)(1)(i) – Ecosystem Integrity, Interdependence of Terrestrial and Aquatic Ecosystems in the Plan Area; and Section 219.9(a)(2)(i) – Ecosystem Diversity, Key Characteristics Associated with Terrestrial and Aquatic Ecosystem Types,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Substantive requirements § 219.8(a)(1)(i) – ecosystem integrity, interdependence of terrestrial and aquatic ecosystems in the plan area; and § 219.9(a)(2)(i) – ecosystem diversity, key characteristics associated with terrestrial and aquatic ecosystem types are directly related to the proposed amendment through the purpose of excepting desired condition TRB-DC-01 and guidelines REC-WR-G-03, WFP-G-06, and WFP-G-07. Note that TRB-DC-01 is not directly related to ecosystem integrity, but the exception of this desired condition allows the placement of infrastructure in areas of Tribal importance, affecting the character of those areas.

Page T-30, Appendix T, “Scope,” under “Section 219.8(a)(1)(i) – Ecosystem Integrity, Interdependence of Terrestrial and Aquatic Ecosystems in the Plan Area; and Section 219.9(a)(2)(i) – Ecosystem Diversity, Key Characteristics Associated with

Terrestrial and Aquatic Ecosystem Types,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: The scope of this component of the project-specific amendment is the exception of the following: three out of seven forest plan guidelines—REC-WR-G-03, WFP-G-06, and WFP-G-07—related to wildlife movement and habitat connectivity, as well as one desired condition related to Tribal relations and areas of Tribal importance (TRB-DC-01), as it applies to the Resolution Copper Project preferred alternative area of disturbance.

Page T-31, Appendix T, “Application,” under “Section 219.8(a)(1)(i) – Ecosystem Integrity, Interdependence of Terrestrial and Aquatic Ecosystems in the Plan Area; and Section 219.9(a)(2)(i) – Ecosystem Diversity, Key Characteristics Associated with Terrestrial and Aquatic Ecosystem Types,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Excepting the Resolution Copper Project from adhering to the one desired condition and three guidelines would have an adverse impact to wildlife movement habitat in the preferred alternative area of disturbance.

Page T-32, Appendix T, “Section 219.8(a)(b) – Social and Economic Sustainability – Cultural and Historic Resources and Uses, Section 219.10(a)(1) – Integrated Resource Management for Multiple Use – Cultural and Heritage Resources, and Section 219.10(b)(1)(ii) – Protection of Cultural and Historic Resources,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Substantive requirements § 219.8(a)(b) – Social and economic sustainability – cultural and historic resources and uses, § 219.10(a)(1) – Integrated resource management for multiple use – cultural and heritage resources, and § 219.10(b)(1)(ii) – Protection of cultural and historic resources are directly related to the proposed amendment based on the purpose of excepting desired conditions CUH-DC-01, CUH-DC-02, ~~and~~ CUH-DC-07, and TRB-DC-01 as they apply to the Resolution Copper Project preferred alternative area of disturbance. Note that TRB-DC-01 is not directly related to cultural resource protection, but the exception of this desired condition allows the placement of infrastructure in areas of Tribal importance, affecting the character of those areas.

Page T-32, Appendix T, “Scope,” under “Section 219.8(a)(b) – Social and Economic Sustainability – Cultural and Historic Resources and Uses, Section 219.10(a)(1) – Integrated Resource Management for Multiple Use – Cultural and Heritage Resources, and Section 219.10(b)(1)(ii) – Protection of Cultural and Historic Resources,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: The scope of this component of the project-specific amendment is the exception of ~~three~~ four forest plan components—desired conditions CUH-DC-01, CUH-DC-02, ~~and~~ CUH-DC-07, and TRB-DC-01—as they apply to the Resolution Copper Project preferred alternative area of disturbance.

Page T-32, Appendix T, “Application,” under “Section 219.8(a)(b) – Social and Economic Sustainability – Cultural and Historic Resources and Uses, Section 219.10(a)(1) – Integrated Resource Management for Multiple Use – Cultural and Heritage Resources, and Section 219.10(b)(1)(ii) – Protection of Cultural and Historic Resources,” under “Step 3: Apply the Directly Related Substantive Requirement” – This appendix is updated as follows: Excepting the Resolution Copper Project from adhering to the ~~three~~ four desired conditions would have an adverse impact on cultural resources in the preferred alternative area of disturbance.

Page T-35, Appendix T, “Compliance with the Planning Rule Regulations” – This appendix is updated as follows: The amendment excepts the Resolution Copper Project from nine guidelines and ~~seven~~ eight desired conditions.

Page T-36, Appendix T, “Compliance with the Planning Rule Regulations” – This

appendix is updated as follows: This proposed amendment excepts nine guidelines and ~~seven-eight~~ desired conditions by describing where the desired conditions and guidelines would not apply, which is consistent with 36 CFR § 219.7(e). The Resolution Copper Project-specific amendment is only applicable to the Resolution Copper Project, which is consistent with 36 CFR § 219.7(e).

Mitigation

The Reviewing Official provided no specific instructions with respect to mitigation measures. However, a number of objections related to proposed mitigation measures in general. Review found that some language in the FEIS with respect to mitigation could be clarified. The following updates relate to clarifying language regarding mitigation measures:

Pages ES-29 and ES-30, Section ES-3.17, “Impact Avoidance, Minimization, and Mitigation” – This section is updated as follows: The FEIS serves in part to inform the public and review agencies of design features, best management practices, and mitigation measures that are included with the project to reduce or avoid impacts. The Forest Service views ~~these elements~~ design features and best management practices (known as applicant-committed environmental protection measures) as part of the project and considers Resolution Copper’s proposed mitigation measures, described in appendix J of the FEIS, as inherent to the proposed alternative, as well as other action alternatives’ applicable components. Other mitigation measures have been developed in response to public comments and the analysis of impacts during the NEPA process, consisting of Forest Service–required mitigation measures as well as mitigation measures committed to by Resolution Copper. To the extent possible, these Forest Service–required measures, including any potential impacts associated with these measures, were considered for effectiveness when assessing the impacts of the project on the resources. Where there is insufficient detail to determine whether an impact can be avoided or minimized, or the measure cannot be required by the Forest Service, the measure cannot be incorporated into the impact analysis but serves to inform the public of Resolution Copper’s plans.

Page 135, Section 2.3, “Mitigation Common to All Action Alternatives” – This section is updated as follows: Delete last bullet point.

- ~~• Mitigation measures and monitoring developed for this project become part of the actions that are proposed in the proposed action or respective alternative. As part of the actions being proposed, the impacts and effectiveness of mitigation measures and monitoring actions are analyzed in tandem with other project actions in chapter 3.~~

And modify the following paragraph: The Forest Service has developed mitigation measures and monitoring actions in response to public comments and the analysis of impacts during the NEPA process to be included as project design features in the proposed action and action alternatives.

Page 135, “Forest Service,” under Section 2.3.1.1, “Authority” – This section is updated as follows:

Forest Service mitigation measures and monitoring are items that would help to minimize impacts on Forest Service surface resources; or are required to mitigate effects on affected species as described in the FWS Biological Opinion for the project. The Forest Service is responsible for determining whether the implementation of mitigation and the results of monitoring comply with the decision that would be documented in the ROD and in the final authorization for the project (a final GPO or a special use permit). Any conservation measures brought forward voluntarily by Resolution Copper during discussions with FWS are considered applicant-committed

environmental protection measures and are inherent to the proposed alternative, as well as other action alternatives' applicable components.

Page 136, “Other Regulatory and Permitting Agencies,” under Section 2.3.1.1, “Authority” – This section is updated as follows: Mitigation and monitoring items under this heading are within the authority of other regulatory permitting agencies, including the ADEQ, ADWR, ASLD, BLM, and Pinal County Air Quality Control District (PCAQCD); and USACE. Mitigation and monitoring measures under this authority include permit requirements and stipulations from legally binding permits and authorizations, such as the air quality permit, APP, and groundwater withdrawal permit. Mitigation that may be required by USACE as part of a potential 404 permitting process has been categorized elsewhere as a Forest Service–required measure. These other regulatory and permitting agencies would share with the Forest Service monitoring results and any instances of applicant non-compliance. The Forest Service would use the information provided by the regulatory and permitting agencies to determine compliance with the decision that would be documented in the ROD and the final project authorization (a final GPO or special use permit).

Page 136, “Resolution Copper,” under Section 2.3.1.1, “Authority” – This section is updated as follows: Resolution Copper has agreed to implement additional mitigation and monitoring measures in the mitigation and monitoring plan that are outside the scope of the authorities listed here. ~~As these were considered as required in the resource analyses, the final ROD would require these mitigations be enforced.~~ These include contractual, financial, and other agreements over which the Forest Service and other regulatory agencies have no jurisdiction. The Forest Service and regulatory agencies have no authority, obligation, or expertise to determine or enforce compliance of these measures. Since the Forest Service and regulatory permitting agencies cannot require implementation of the mitigation and monitoring measures in this authority, their implementation is not guaranteed ~~until required by a signed final ROD with the mitigations included.~~ The effectiveness of these mitigation measures is included in chapter 3 impact analyses, but they are not assumed to offset any adverse impacts.

Page 137, Section 2.3.1.2, “Post-DEIS Mitigation Development Process” – This section is updated as follows: Other mitigation measures were developed after the DEIS as part of other specific regulatory processes. ~~These are described in appendix J and include the following:~~

- Development of mitigations related to impacts to Tribes and cultural resources as part of the PA. The PA was never executed, but all of these measures remain in place, although under different authorities. This is described in appendix J.
- Development and approval by the USACE of compensatory mitigation related to permitting under Section 404 of the CWA (included with the FEIS as appendix D). Surface disturbance associated with these mitigations is included in the acreage calculations in the FEIS, as detailed in the next section.
- Conservation measures developed during consultation with the FWS in compliance with Section 7 of the Endangered Species Act (ESA). These are codified in the approved Biological Opinion (included with the FEIS as appendix P), are an inherent part of the project, and are handled as applicant-committed environmental protection measures in chapter 3 of the FEIS.

Page 204, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Geology, Minerals, and Subsidence,” under Section 3.2.4.9, “Mitigation Effectiveness” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in

contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for geology, minerals, and subsidence, ~~which is reflected in the unavoidable adverse impacts disclosed below.~~

Page 310, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Noise and Vibration,” under Section 3.4.4.8, “Mitigation Effectiveness” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for noise and vibration, ~~which is reflected in the unavoidable adverse impacts disclosed below.~~

Page 329, “Summary of Applicant-Committed Environmental Protection Measures,” under Section 3.5.4.2, “Impacts Common to All Action Alternatives” – This section is updated as follows: Four additional measures were identified in the traffic impact studies (Southwest Traffic Engineering LLC 2017, 2020b) and subsequent sensitivity analysis review (Hussein and Miles 2020) as being recommended to improve LOS and potential safety impacts caused by mine traffic. These are discussed further as a potential mitigation measure in the ~~“Mitigation Effectiveness” section~~ Garrett (2025).

Page 348, “Mitigation Effectiveness and Impacts of Resolution Voluntary Mitigation Measures Applicable to Transportation and Access,” under Section 3.5.4.8, “Mitigation Effectiveness” – This section is updated as follows: ~~Appendix J contains several other potential future mitigation measures that the Forest Service is disclosing as potentially useful in mitigating adverse effects, but for which there is no authority to require. There is no expectation that these measures would occur, and therefore the effectiveness is not considered in the EIS. No potential future mitigation measures were identified that are applicable to transportation and access.~~

Appendix J contains mitigation and monitoring measures brought forward voluntarily by Resolution Copper and committed to in correspondence with the Forest Service. These measures are assumed to occur but are not guaranteed to occur. Their effectiveness and impacts if they were to occur are disclosed here; however, the unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account. No additional mitigation measures were voluntarily brought forward applicable to transportation and access.

Page 453, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Groundwater Quantity and Groundwater-Dependent Ecosystems,” under “Mitigation Effectiveness,” under Section 3.7.1.4, “Environmental Consequences of Implementation of the Proposed Mine Plan and Alternatives” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for groundwater quantity and GDEs, ~~which is reflected in the unavoidable adverse impacts~~

~~disclosed below.~~

Page 563, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Groundwater and Surface Water Quality,” under “Mitigation Effectiveness,” under Section 3.7.2.4, “Environmental Consequences of Implementation of the Proposed Mine Plan and Alternatives” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for groundwater and surface water quality, which is reflected in the ~~unavoidable adverse impacts disclosed below.~~

Page 597, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Surface Water Quantity,” under “Mitigation Effectiveness,” under Section 3.7.3.4, “Environmental Consequences of Implementation of the Proposed Mine Plan and Alternatives” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for surface water quantity, which is reflected in the ~~unavoidable adverse impacts disclosed below.~~

Page 643, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Wildlife,” under Section 3.8.4.4, “Mitigation Effectiveness” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for wildlife, which is reflected in the ~~unavoidable adverse impacts disclosed below.~~

Page 667, “Summary of Applicant-Committed Environmental Protection Measures,” under Section 3.9.4.2, “Impacts Common to All Action Alternatives” – This section is updated as follows:

- Developing traditional and sport climbing open to the public on Resolution Copper property outside of the mining footprint through agreement with Queen Creek Coalition. Further detail can be found on the Queen Creek Coalition website and the agreement with REI. Additional details of this measure were developed by Resolution Copper in response to public comments and in response to impacts disclosed during the NEPA process. These aspects of the plan are discussed in the “Mitigation Effectiveness” section and in appendix J (mitigation measure RC-RC-05).

Page 812, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Scenic Resources,” under Section 3.11.4.10, “Mitigation Effectiveness” – This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and

their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for scenic resources, ~~which is reflected in the unavoidable adverse impacts disclosed below.~~

Page 849, “Summary of Applicant-Committed Environmental Protection Measures,” under Section 3.13.4.2, “Direct and Indirect Effects Common to All Action Alternatives”

– This section is updated as follows: Add paragraph at end of subsection, after the bulleted list: Additional agreements between Resolution Copper and the Town of Superior, as well as Resolution Copper and other communities (known as the Good Neighbor Agreement), were developed in response to public comments and in response to impacts disclosed during the NEPA process. These agreements are discussed in the “Mitigation Effectiveness” section and in appendix J (mitigation measures RC-SO-01, RC-SO-03, RC-SO-04, and RC-SO-06).

Page 911, “Mitigation Effectiveness and Impacts of Resolution Committed Mitigation Measures Applicable to Livestock Grazing,” under Section 3.16.4.9, “Mitigation Effectiveness”

– This section is updated as follows: Appendix J contains mitigation and monitoring measures committed by Resolution Copper in contractual, financial, or other agreements. Due to these commitments these measures are assumed to occur, and their effectiveness and impacts if they were to occur are disclosed here. The unavoidable adverse impacts disclosed below do not take the effectiveness of these mitigations into account as they are not within the authority of the Forest Service to ensure. However, there are no Resolution Copper-committed mitigations for livestock grazing, ~~which is reflected in the unavoidable adverse impacts disclosed below.~~

Page J-2, Appendix J, “Design Features and Applicant-Committed Environmental Protection Measures”

– This appendix is updated as follows: The implementation and effectiveness of applicant-committed environmental protection measures are considered integral to the analysis considered in this FEIS. These design features would be a requirement of the record of decision (ROD) and final mining plan of operations or special use permit.

Page J-2, Appendix J, “Mitigation and Monitoring Required by Forest Service,” under “Mitigation and Monitoring Measures Considered in Chapter 3 Impacts Analysis”

– This appendix is updated as follows: For the Forest Service to require implementation of mitigation, the mitigation must have a direct connection to avoiding, mitigating, or minimizing effects on NFS surface resources. The Forest Service has no authority, obligation, or expertise to determine or enforce compliance with other agencies’ laws or regulations. However, it is the operator’s responsibility to ensure that its actions comply with applicable laws. ~~The Forest Service will only approve a final plan of operations once all other necessary permits are approved.~~

Page J-50, Appendix J, “Mitigation and Monitoring that Could Be Required by Other Regulatory and Permitting Agencies”

– This appendix is updated as follows: Potential mitigation and monitoring measures associated with the permits listed below are within the authority of other regulatory permitting agencies and could be required, including ADEQ and Arizona Department of Water Resources. These measures were not considered in the chapter 3 impacts analysis. The Forest Service has no authority, obligation, or expertise to determine or enforce compliance for the measures associated with the permits listed in this section, ~~as they have not yet been required by other agencies, nor have they been agreed to by Resolution Copper.~~ The mitigation and monitoring measures in this section include permit requirements and stipulations from legally binding permits and authorizations such as the air quality permit, APP, and groundwater withdrawal permit.

Town of Superior Exchange Lands

The following updates relate to minor clarification of terminology regarding the Town of Superior land transfer:

Page 16, Section 1.4.2.2, “Town of Superior Exchange Lands” – This section is updated as follows: The title of the section is updated to “Town of Superior ~~Exchange-Transfer~~ Lands.”

In addition, this section is updated as follows: An additional condition of PL 113-291 calls for the United States to transfer several parcels to the Town of Superior, Arizona, if the Town of Superior requests it. The Forest Service-administered lands to be conveyed to the Town of Superior include a 30-acre parcel known as Fairview Cemetery and 250 acres contained in four parcels known as the Superior Airport Contiguous Parcels. In addition, the Town of Superior lands include a Federal reversionary interest to a 265-acre Superior Airport Parcel. The Superior Airport Parcel originally was owned by the Federal Government, then deeded to Pinal County, and subsequently conveyed to the Town of Superior with the condition that it could only be used as an airstrip. Any other use would cause the property to revert to Federal land (the reversionary interest). As part of the land ~~exchange-transfer~~, the Federal reversionary interest would be removed, after which time the parcel could be used for non-airport purposes. On October 15, 2021, the Town of Superior requested to purchase the Superior Airport Contiguous Parcels and the Federal reversionary interest to the 265-acre Superior Airport Parcel. On March 25, 2022, the Town updated its request to purchase to include the 30-acre parcel known as Fairview Cemetery. The direction in PL 113-291 that requires that a single EIS be prepared is specific to “all decisions under Federal law related to the proposed mine and the Resolution mine plan of operations.” The Town of Superior land ~~exchange-transfer~~ is not directly related to the proposed mine, would be subject to separate analysis under NEPA, and is not considered to be a connected action to the Resolution Copper Project. In June 2024, the BLM published Public Land Order No. 7943, withdrawing the Town of Superior exchange lands from location and entry under U.S. mining laws (Bureau of Land Management 2024; U.S. Forest Service 2024b).

Page 824, “Inventories of the Direct Impacts Analysis Area,” under Section 3.12.3.2, “Existing Conditions and Ongoing Trends” – This section is updated as follows: Surveys have also been completed of the Superior Airport Contiguous Parcels and Fairview Cemetery parcel (Brown and Buckles 2019; King 2020). These parcels were requested in October 2021 by the Town of Superior as part of a land ~~exchange-transfer~~ as described in Section 3003(h) of PL 113-291. These parcels are not included in the FEIS analysis, as described in chapter 1.

Livestock and Grazing

The following updates relate to minor clarification of terminology regarding livestock and grazing:

Page 897, Section 3.16.3.2, “Existing Conditions and Ongoing Trends” – This section is updated as follows: Because of their relatively large and complex geographic areas, each grazing allotment is of varying size and varying land management; however, allotments are typically leased by a single entity that must obtain ~~grazing rights~~ (a permit or authorization) from each respective land manager/owner.

Page 905, Section 3.16.4.3, “Alternative 2 – Near West Proposed Action” – This section is updated as follows: For the Devil’s Canyon Allotment, Resolution Copper currently holds ~~the grazing rights~~ via permits with the Tonto National Forest and the ASLD over Oak Flat, the mine area, and a portion of the pipeline/power line corridor and intends to continue grazing (Resolution Copper 2020e).

Page 906, Section 3.16.4.5, “Alternative 4 – Silver King” – This section is updated as

follows:

For the Devil's Canyon Allotment, Resolution Copper currently holds ~~the grazing rights~~ ~~via~~ permits with the Tonto National Forest and the ASLD over Oak Flat, the mine area, and a portion of the pipeline/power line corridor and intends to continue grazing (Resolution Copper 2020e).

Page 907, Section 3.16.4.6, "Alternative 5 – Peg Leg" – This section is updated as follows:

For the Devil's Canyon Allotment, Resolution Copper currently holds ~~the grazing rights~~ ~~via~~ permits with the Tonto National Forest and the ASLD over Oak Flat, the mine area, and a portion of the pipeline/power line corridor and intends to continue grazing (Resolution Copper 2020e).

Page 908, Section 3.16.4.7, "Alternative 6 – Skunk Camp" – This section is updated as follows: Under Alternative 6, approximately 13,781 acres of existing livestock grazing would be lost over nine allotments, with the largest grazing impacts to acreage occurring on the Slash S Allotment. Slightly fewer acres on each of the Devil's Canyon and Victory Cross Allotments would be affected, with relatively minor impacts on the remaining allotments. For the Devil's Canyon Allotment, Resolution Copper currently holds ~~the grazing rights~~ ~~via~~ permits with the Tonto National Forest and the ASLD over Oak Flat, the mine area, and a portion of the pipeline/power line corridor and intends to continue grazing (Resolution Copper 2020e).

Resolution Copper currently holds ~~the grazing rights~~ ~~via~~ permits with the ASLD (and BLM) for a portion of the Skunk Camp tailings storage facility (Victory Cross Grazing Allotment) and intends to continue grazing (Resolution Copper 2020e).

BLM commented on the DEIS that implementation of the Skunk Camp alternative would result in the removal of the ranch headquarters for the Slash S Allotment, including residences, barns, corrals, fences, and stock watering features. This would constitute a total loss of ranching infrastructure and directly affect ranching operations for this allotment. However, Resolution Copper holds grazing ~~rights~~ ~~permits~~ through a future interest in the Slash S Allotment and intends to continue grazing, regardless of impacts to infrastructure (Resolution Copper 2020e).

2023 ADWR Salt River Valley Model

The pre-decisional objection letters identified a point of confusion regarding the date of the 2023 ADWR Salt River Valley model discussed in chapter 4 of the FEIS. The following updates relate to clarifying the documents reviewed for the FEIS pertinent to the ADWR Salt River Valley Model:

Page 988, "2023 ADWR Salt River Valley Model Update," under Section 4.3.4.1, "Cumulative Effects on Regional Water Supplies" – This section is updated as follows: In June 2023, ADWR released the results of a new predictive model run using the SRV model for the period 2022 through 2121 (ADWR 2023a, 2023b, 2023c). The release of the new model results triggered substantial public concern and news coverage, as it was accompanied by an announced moratorium on approving new Assured Water Supplies for development within the Phoenix AMA. ADWR also released an update of the 2023 model in November 2024 (ADWR 2024). However, while the 2023 release was a multi-year overhaul effort, the 2024 release was limited in nature and "simply updates the pumping data with the next reporting year, recharge volumes, and locations, and approved well movements from property owners" (ADWR 2024). The discussion below is applicable to the 2023 model and the 2024 update to the model.

Bureau of Land Management Water Review

The pre-decisional objection letters identified a point of confusion about whether the 2022 technical review by the Bureau of Land Management was considered in the FEIS. The following updates clarify that the review was considered and changes made to the FEIS as appropriate:

Page 1003, New section, Section 5.9.1, “Bureau of Land Management Water Review,” under Section 5.9, “Cooperating Agencies” – This section is updated as follows: Add entirely new section, Section 5.9.1, “Bureau of Land Management Water Review.”

5.9.1 Bureau of Land Management Water Review

As part of reinitiation of Tribal consultation in September 2021, at the request of the Department of Agriculture, the BLM provided a targeted technical review of the January 2021 FEIS and supporting documents (Dubas et al. 2022). BLM hydrology specialists reported that they reviewed the hydrology and water resources aspects of the project and assessed whether the FEIS adequately addressed comments received during the EIS development process. BLM noted that due to the substantial number of supplemental studies and amount of analysis conducted to develop the multivolume FEIS, and the relatively short time within which the evaluation was conducted, the BLM reviewers consider the document to be a high-level review that focuses on broader topics.

The Forest Service fully reviewed the BLM report and assessed the recommendations for inclusion in the FEIS. The detailed responses to all of the BLM recommendations can be found in Garrett (2023c). The Forest Service assessed 35 specific issues or recommendations. The following items were changed in the FEIS or added to the FEIS in response to the BLM report. The identifiers (e.g., Issue BLM-3) refer to specific items in Garrett (2023c):

1. A new analysis of potential impacts to the Cutter Basin was added to FEIS Section 3.7.1, “Indirect Effects on Cutter Basin” (Issue BLM-15).
2. Additional analysis quantifying the number of private wells impacted by Desert Wellfield pumping as added to FEIS section 3.7 for each alternative (Issue BLM-36).
3. Additional documentation on assessing the potential to store tailings at multiple brownfield sites was added to FEIS Appendix F, “Consideration of Disposal in Multiple Mine Pits” (Issue BLM-20).
4. Two new sections were added to FEIS section 3.7.1 to discuss legal frameworks associated with water: “Arizona Legal Framework Concerning Water Use” and “Laws Concerning Forest Service Management of Springs and Water Resources” (Issue BLM-6).
5. Two new sections were added to FEIS chapter 4 to discuss how climate change was incorporated into water and tailings analyses: “Assessment of Future Meteorological Trends in Groundwater Models” and “Future Meteorological Trends and Ramifications for Potential Tailings Failure” (Issues BLM-16 and BLM-17).
6. Figure 3.7.1-4 was added to FEIS section 3.7.1, showing basins/subbasins and Cutter Basin (Issue BLM-2).
7. Figure 3.7.1-5 was added to FEIS section 3.7.1, showing cross section from Desert Wellfield to Gila River (Issue BLM-2).

8. The discussion was expanded in FEIS Section 3.7.1, “Model Calibration,” to compare deep groundwater system calibration and Apache Leap tuff groundwater system calibration (Issue BLM-2).
9. Figures 3.7.1-12 and 3.7.1-13 were added to FEIS section 3.7.1, showing geology and cross section from mine site to Cutter Basin (Issue BLM-2).
10. Figures 3.7.3-2, 3.7.3-3, 3.7.3-4, and 3.7.3-5 were added to FEIS section 3.7.3, showing surface water basins related to each alternative (Issue BLM-2).
11. A discussion had been added to FEIS Section 1.1.3.6, “Status of CEQ Regulations,” to discuss changes to CEQ regulations (Issue BLM-8). However, the subsequent rescinding of the CEQ regulations rendered much of the discussion invalid, and it was removed before FEIS publication in June 2025.
12. Additional discussion was added to FEIS Section 3.7.1, “Identifying and Defining Groundwater-Dependent Ecosystems,” to clarify the data sources used to compile the list of springs and seeps (Issue BLM-9).
13. Additional discussion of Superstition Vistas was added to FEIS chapter 4 to reflect the recent land auction (Issue BLM-10).
14. Changes were made to the language used to describe the no action alternative in FEIS chapter 2 (Issue BLM-11); however, the subsequent rescinding of the CEQ regulations altered this section further before publication of the FEIS in June 2025.
15. Water use amounts were added to the tables that summarize each action alternative in FEIS chapter 2 (Issue BLM-13).
16. An update was made to mitigation measure FS-WR-04, “Replacement of water in Queen Creek,” in FEIS appendix J (Issue BLM-26).
17. Expanded discussion of the types of well impacts that could occur due to drawdown impacts was added to FEIS section 3.7.1 (Issue BLM-27).
18. Clarification of post-closure water budgets was added for each alternative in FEIS section 3.7.2 (Issue BLM-28).
19. Discussion of the potential indirect impacts associated with mitigating groundwater-dependent ecosystems was added to FEIS Section 3.7.1, “Impacts from Mitigation Actions” (Issue BLM-30).
20. An additional section was added in FEIS Section 3.7.2, “Post-closure Aquifer Conditions,” to further clarify the potential for a subsidence crater lake to develop (Issue BLM-35).

Literature Cited

The following updates relate to entries in the literature cited, either to support language included via the errata, or to correct minor errors:

Page 1014 in “Chapter 7. Literature Cited” – This chapter is updated as follows: New reference added.

Arizona Department of Water Resources (ADWR). 2024. *Phoenix AMA: Groundwater Model and 100-Year Assured Water Supply Projection Updated with 2022 Data*. Technical memorandum. Phoenix, Arizona: Groundwater Modeling Division, Hydrology Division, Department of Water Resources. November.

Page 1023 in “Chapter 7. Literature Cited” – This chapter is updated as follows: New reference added.

Dubas, L., J. Johnsen, and S. Rice. 2022. *Bureau of Land Management Review of Hydrology Aspects of the Resolution Copper Project*. Phoenix, Arizona: Bureau of Land Management Arizona State Office; Denver, Colorado: Bureau of Land Management National Operations Center; Idaho Falls, Idaho: Bureau of Land Management Upper Snake Field Office. June 13.

Page 551, “Alternative 6 – Skunk Camp,” under “Potential Water Quality Impacts from Tailings Storage Facility,” under “Risk of Seepage Impacting Groundwater or Surface Water Quality,” under “FEIS Water Quality Model – Additional

Considerations after January 2021” – The following chapter is updated as follows: We reference Montgomery and Associates Inc. (2022), but the wrong document was listed on **page 1042 in “Chapter 7. Literature Cited”** – This entry is updated as follows: Incorrect reference deleted and correct reference added.

~~Montgomery & Associates. 2022. *Monitoring and Mitigation Plan for Groundwater Dependent Ecosystems and Water Wells*. Prepared for Resolution Copper. Tucson, Arizona: Montgomery and Associates. December 7.~~

Montgomery and Associates Inc. 2022. *Numerical Groundwater Flow Model for the Skunk Camp Tailings Storage Facility*. Prepared for Resolution Copper. Tucson, Arizona: Montgomery and Associates Inc. June 21.

Page 1029 in “Chapter 7. Literature Cited” – This chapter is updated as follows: New reference added.

Garrett, C. 2023c. *Evaluation of Post–January 2021 Comments*. Process memorandum to file. Phoenix, Arizona: SWCA Environmental Consultants. March 27.

Page 1045 in “Chapter 7. Literature Cited” – This chapter is updated as follows: Newell and Garrett (2018b) was a duplicate of Newell and Garrett (2018c) with an incorrect date of August 8. Duplicate reference deleted.

~~Newell, E., and C. Garrett. 2018b. *Public Health & Safety Resource Analysis: Assumptions, Methodology Used, Relevant Regulations, Laws, and Guidance, and Key Documents*. Process memorandum to file. Phoenix, Arizona: SWCA Environmental Consultants. August 8.~~

APPENDIX A - SPECIAL USE PERMIT APPLICATIONS



File Code: 2720
Date: March 15, 2026

Ms. Vicky Peacey
President
Resolution Copper Mining, LLC
102 Magma Heights
Superior, AZ 85173

Sent via email to: Victoria.Peacey@RioTinto.com

Dear Ms. Peacey:

I have reviewed your company's proposal for the use of the Magma Arizona Railroad Company (MARRCO) corridor for future concentrate pipelines, and current and future water pipelines, from Superior, Arizona across national forest system (NFS) lands administered by the Tonto National Forest, to the location where the MARRCO corridor exits forest system lands. Based on the initial documents provided (i.e. cover letter, SF-299, and attachment dated 03/15/2026), the proposal passes the first and second level screening criteria as outlined in FSH 2709.11, Chapter 10. At this time, we are prepared to accept your proposal as a formal application. These actions have been fully evaluated in the Resolution Copper Project and Land Exchange Final Environmental Impact Statement (FEIS) pursuant to the National Environmental Policy Act (NEPA), its implementing regulations.

An administrative tracking number (TON1532) has been assigned to this pipeline special use application/authorization. Please include this application/authorization number with all future correspondence.

Before I can approve the application to proceed with construction (comprising of future concentrate pipelines, current and future water pipelines, access roads, and temporary construction laydown yards), the Record of Decision for the FEIS must be signed.



If you have any questions about the environmental review process, project documents, or your Special Use Permit, please contact your Permit Administrator, Mark McEntarffer, at 602-225-5239 or Mark.McEntarffer@usda.gov.

Sincerely,

X

Erica Luna
Acting Forest Supervisor

cc: mark.mcentarffer@usda.gov; marianne.thomas@usda.gov;
devin.quintana@usda.gov

**APPLICATION FOR TRANSPORTATION, UTILITY SYSTEMS, TELECOMMUNICATIONS AND FACILITIES
ON FEDERAL LANDS AND PROPERTY**

FORM APPROVED
OMB Control Number: 0596-0249
Expiration Date: 1/31/2027

FOR AGENCY USE ONLY

NOTE: Before completing and filing the application for an authorization (easement, right-of-way, lease, license or permit), the applicant should completely review this package, including instructions, and schedule a pre-application meeting with representatives of the agency responsible for processing the application. Each agency may have specific and unique requirements to be met in preparing and processing the application. Many times, with the help of the agency representative, the application can be completed at the pre-application meeting.

Application Number

Date Filed

1. Name and address of applicant
Resolution Copper Mining LLC
102 Magma Heights
PO Box 1944
Superior, AZ 85173

2. Name and address of authorized agent if different from item 1

3. Applicant telephone number and email:

Authorized agent telephone number and email:

4. As applicant are you? (check one)

a. Individual
b. Corporation*
c. Partnership/Association*
d. State Government/State Agency
e. Local Government
f. Federal Agency

* If checked, complete supplemental page

5. Specify what application is for: (check one)

a. New authorization
b. Renewing existing authorization number
c. Amend existing authorization number
d. Assign existing authorization number
e. Existing use for which no authorization has been received *
f. Other*

* If checked, provide details under item 7

6. If an individual, or partnership, are you a citizen(s) of the United States? Yes No

7. Project description (describe in detail): (a) Type of use or occupancy, (e.g., canal, pipeline, road, telecommunications); (b) related structures and facilities; (c) physical specifications (Length, width, grading, etc.); (d) term of days/years needed; (e) time of year of use or operation; (f) Volume or amount of product to be transported; (g) duration and timing of construction; and (h) temporary work areas needed for activity/construction (Attach additional sheets, if additional space is needed.)

Please refer to the June 2025 Final Environmental Impact Statement, Resolution Copper Project and Land Exchange (FEIS) for the description of existing and future infrastructure within the MARRCO corridor. This includes figures and a full analysis of the existing water line as well as construction, operation, and maintenance of future pipelines. The original Special Use Permit for constructing, operating, and maintaining the existing water pipeline was issued in 2008 by the USDA Forest Service.

8. Attach a map covering area and show location of project proposal.

9. State or Local government approval: Attached Applied for Not Required

10. Nonrefundable application fee: Attached Not required To be determined by agency

11. Does project cross international boundary or affect international waterways? Yes No (if "yes," indicate on map)

12. Give statement of your technical and financial capability to construct, operate, maintain, and terminate system for which authorization is being requested.

Please refer to June 2025 Final Environmental Impact Statement, Resolution Copper Project and Land Exchange (FEIS) for details.

13a. Describe other alternative locations considered.
Analysis provided in FEIS.

b. Why were these alternatives not selected?
Please see FEIS for alternatives analysis.

c. Give explanation as to why it is necessary to use or occupy Federal assets (lands or buildings).
Please see FEIS.

14. List authorizations and pending applications filed for similar projects which may provide information to the authorizing agency. (Specify number, date, code, or name)
NA

15. Provide statement of need for project, including the economic feasibility and items such as: (a) cost of proposal (construction, operation, and maintenance); (b) estimated cost of next best alternative; and (c) expected public benefits.
Please see FEIS.

16. Describe probable effects on the population in the area, including the social and economic aspects, and the rural lifestyles.
Please see FEIS.

17. Describe likely environmental effects that the proposed project will have on: (a) air quality; (b) visual impact; (c) surface and ground water quality and quantity; (d) the control or structural change on any stream or other body of water; (e) existing noise levels; and (f) the surface of the land, including vegetation, permafrost, soil, and soil stability; and, (g) historic or archaeological resources or properties.
Please see FEIS.

18. Describe the probable effects that the proposed project will have on (a) populations of fish, plant life, wildlife, and marine life, including threatened and endangered species; and (b) marine mammals, including hunting, capturing, collecting, or killing these animals.
Please see FEIS.

19. State whether any hazardous material, as defined in this paragraph, would be used, produced, transported or stored on or in a federal building or federal lands or would be used in connection with the proposed use or occupancy. "Hazardous material" shall mean (a) any hazardous substance under section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9601(14); (b) any pollutant or contaminant under section 101(33) of CERCLA, 42 U.S.C. § 9601(33); (c) any petroleum product or its derivative, including fuel oil, and waste oils; and (d) any hazardous substance, extremely hazardous substance, toxic substance, hazardous waste, ignitable, reactive or corrosive materials, pollutant, contaminant, element, compound, mixture, solution or substance that may pose a present or potential hazard to human health or the environment under any applicable environmental laws. The holder shall not store any hazardous materials at the site without prior written approval from the authorized officer. This approval shall not be unreasonably withheld. If the authorized officer provides approval, this permit shall include (or in the case of approval provided after this permit is issued, shall be amended to include) specific terms addressing the storage of hazardous materials, including the specific type of materials to be stored, the volume, the type of storage, and a spill plan. Such terms shall be proposed by the holder and are subject to approval by the authorized officer.

Please see FEIS.

20. Name all the Federal Department(s)/Agency(ies) where this application is being filed.
United States Forest Service

I HEREBY CERTIFY, That I am of legal age and authorized to do business in the State and that I have personally examined the information contained in the application and believe that the information submitted is correct to the best of my knowledge.

Signature of Applicant

Victoria Peacey

Digitally signed by Victoria Peacey
Date: 2026.03.15 18:16:23 -07'00'

Date

March 15, 2026

Title 18, U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious, or fraudulent statements or representations as to any matter within its jurisdiction.

GENERAL INFORMATION
ALASKA NATIONAL INTEREST LANDS

This application will be used when applying for a right-of-way, permit, license, lease, or certificate for the use of Federal lands which lie within conservation system units and National Recreation or Conservation Areas as defined in the Alaska National Interest lands Conservation Act. Conservation system units include the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers System, National Trails System, National Wilderness Preservation System, and National Forest Monuments.

Transportation utility systems telecommunication installations facility uses for which the application may be used are:

1. Canals, ditches, flumes, laterals, pipes, pipelines, tunnels, and other systems for the transportation of water.
2. Pipelines and other systems for the transportation of liquids other than water, including oil, natural gas, synthetic liquid and gaseous fuels, and any refined product produced therefrom.
3. Pipelines, slurry and emulsion systems, and conveyor belts for transportation of solid materials.
4. Systems for the transmission and distribution of electric energy.
5. Wired and wireless systems for transmission or reception of radio, television, telephone, telegraph, and other electronic signals, and other means of communications.
6. Improved right-of-way for snow machines, air cushion vehicles, and all-terrain vehicles.
7. Roads, highways, railroads, tunnels, tramways, airports, landing strips, docks, and other systems of general transportation.

This application must be filed simultaneously with each Federal department or agency requiring authorization to establish and operate your proposal.

In Alaska, the following agencies will help the applicant file an application and identify the other agencies the applicant should contact and possibly file with:

Department of Agriculture
Regional Forester, Forest Service (USFS)
P.O. Box 21628
Juneau, Alaska 99802-1628
Telephone: (907) 586-7847
(or a local Forest Service Office)

Department of the Interior
Bureau of Indian Affairs (BIA)
Alaska Regional Office
709 West 9th Street
Juneau, Alaska 99802
Telephone: (907) 586-7177

Department of the Interior
Alaska State Office
Bureau of Land Management
222 West 7th Avenue #13
Anchorage, Alaska 99513
Public Room: 907-271-5960
FAX: 907-271-3684
(or a local BLM Office)

U.S. Fish & Wildlife Service (FWS)
Office of the Regional Director
1011 East Tudor Road
Anchorage, Alaska 99503
Telephone: (907) 786-3440

National Park Service (NPS)
Alaska Regional Office
240 West 5th Avenue
Anchorage, Alaska 99501
Telephone: (907) 644-3510

Department of Transportation
Federal Aviation Administration
Alaska Region AAL-4, 222 West 7th Ave., Box 14
Anchorage, Alaska 99513-7587
Telephone: (907) 271-5285

NOTE - The Department of Transportation has established the above central filing point for agencies within that Department. Affected agencies are: Federal Aviation Administration (FAA), Coast Guard (USCG), Federal Highway Administration (FHWA), Federal Railroad Administration (FRA).

OTHER THAN ALASKA NATIONAL INTEREST LANDS

Use of this form is not limited to National Interest Conservation Lands of Alaska.

Individual department/agencies may authorize the use of this form by applicants for transportation, utility systems, telecommunication installations and facilities on other Federal lands outside those areas described above.

For proposals located outside of Alaska, applications will be filed at the local agency office or at a location specified by the responsible Federal agency.

SPECIFIC INSTRUCTIONS
(Items not listed are self-explanatory)

- 7 Attach preliminary site and facility construction plans. The responsible agency will provide instructions whenever specific plans are required.
- 8 Generally, the map must show the section(s), township(s), and range(s) within which the project is to be located. Show the proposed location of the project on the map as accurately as possible. Some agencies require detailed survey maps. The responsible agency will provide additional instructions.
- 9, 10, and 12 The responsible agency will provide additional instructions.
- 13 Providing information on alternate locations in as much detail as possible, discussing why certain locations were rejected and why it is necessary to use Federal assets will assist the agency(ies) in processing your application and reaching a final decision. Include only reasonable alternate locations as related to current technology and economics.
- 14 The responsible agency will provide instructions.
- 15 Generally, a simple statement of the purpose of the proposal will be sufficient. However, major proposals located in critical or sensitive areas may require a full analysis with additional specific information. The responsible agency will provide additional instructions.
- 16 through 19 Providing this information with as much detail as possible will assist the Federal agency(ies) in processing the application and reaching a decision. When completing these items, you should use a sound judgment in furnishing relevant information. For example, if the project is not near a stream or other body of water, do not address this subject. The responsible agency will provide additional instructions.

Application must be signed by the applicant or applicant's authorized representative.

Note - Filings with any Interior agency may be filed with any office noted above or with the Office of the Secretary of the Interior, Regional Environmental Officer, P.O. Box 120, 1675 C Street, Anchorage, Alaska 99513.

PUBLIC BURDEN STATEMENT

The Federal agencies collect this information from proponents and applicants requesting a right-of-way, permit, license, lease, or certification for use of Federal assets. The Federal agencies use this information to evaluate a proponent's or applicant's proposal to use Federal assets. A Federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with an information collection subject to the requirements of the Paperwork Reduction Act of 1995 unless the information collection has a currently valid Office of Management and Budget (OMB) Control Number. The approved OMB Control Number for this information collection is 0596-0249. Without this approval, we could not conduct this information collection. Public reporting for this information collection is estimated to be approximately 8 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection. All responses to this information collection are voluntary. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to the USDA Forest Service email address SM.FS.InfoCollect@usda.gov and include the OMB Control Number in the subject line. Disclosure of the information is voluntary. If all the information is not provided, the proposal or application may be rejected. Concerns about this form can be sent to Director, Lands, Minerals, and Geology Management Staff, 1st Floor Southeast, 201 14th Street, SW, Washington, DC 20250-1124

USDA NONDISCRIMINATION STATEMENT

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English. To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at [How to File a Program Discrimination Complaint and at any USDA office](#) or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, DC 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov. The Privacy Act of 1974 (5 U.S.C. 552a) and the Freedom of Information Act (5 U.S.C. 552) govern the confidentiality to be provided for information received by the Forest Service.

SUPPLEMENTAL

NOTE: The responsible agency(ies) will provide instructions	CHECK APPROPRIATE BLOCK	
I - PRIVATE CORPORATIONS	ATTACHED	FILED *
a. Articles of Incorporation	<input type="checkbox"/>	<input type="checkbox"/>
b. Corporation Bylaws	<input type="checkbox"/>	<input type="checkbox"/>
c. A certification from the State showing the corporation is in good standing and is entitled to operate within the State	<input type="checkbox"/>	<input type="checkbox"/>
d. Copy of resolution authorizing filing	<input type="checkbox"/>	<input type="checkbox"/>
e. The name and address of each shareholder owning 3 percent or more of the shares, together with the number and percentage of any class of voting shares of the entity which such shareholder is authorized to vote and the name and address of each affiliate of the entity together with, in the case of an affiliate controlled by the entity, the number of shares and the percentage of any class of voting stock of that affiliate owned, directly or indirectly, by that entity, and in the case of an affiliate which controls that entity, the number of shares and the percentage of any class of voting stock of that entity owned, directly or indirectly, by the affiliate.	<input type="checkbox"/>	<input type="checkbox"/>
f. If application is for an oil or gas pipeline, describe any related right-of-way or temporary use permit applications, and identify previous applications.	<input type="checkbox"/>	<input type="checkbox"/>
g. If application is for an oil and gas pipeline, identify all Federal lands by agency impacted by proposal.	<input type="checkbox"/>	<input type="checkbox"/>
II - PUBLIC CORPORATIONS		
a. Copy of law forming corporation	<input type="checkbox"/>	<input type="checkbox"/>
b. Proof of organization	<input type="checkbox"/>	<input type="checkbox"/>
c. Copy of Bylaws	<input type="checkbox"/>	<input type="checkbox"/>
d. Copy of resolution authorizing filing	<input type="checkbox"/>	<input type="checkbox"/>
e. If application is for an oil or gas pipeline, provide information required by item "I - f" and "I - g" above.	<input type="checkbox"/>	<input type="checkbox"/>
III - PARTNERSHIP OR OTHER UNINCORPORATED ENTITY		
a. Articles of association, if any	<input type="checkbox"/>	<input type="checkbox"/>
b. If one partner is authorized to sign, resolution authorizing action is	<input type="checkbox"/>	<input type="checkbox"/>
c. Name and address of each participant, partner, association, or other	<input type="checkbox"/>	<input type="checkbox"/>
d. If application is for an oil or gas pipeline, provide information required by item "I - f" and "I - g" above.	<input type="checkbox"/>	<input type="checkbox"/>

* If the required information is already filed with the agency processing this application and is current, check block entitled "Filed." Provide the file identification information (e.g., number, date, code, name). If not on file or current, attach the requested information.