# Resolution Copper Project and Land Exchange Environmental Impact Statement

USDA Forest Service Tonto National Forest Arizona

August 6, 2018

# Process Memorandum to File

Socioeconomics Resource Analysis: Assumptions; Methodology	Used;
Relevant Regulations, Laws, and Guidance; and Key Documents	

This document is deliberative and is prepared by the third-party contractor in compliance with the National Environmental Policy Act and other laws, regulations, and policies to document ongoing process and analysis steps. This document does not take the place of any Line Officer's decision space related to this project.

### **Revision History**

Date	Personnel	Revisions Made
08/06/18	Emily Newell	Process memorandum created.
10/29/18	Emily Newell	Revisions to memorandum title, revision history table added, edits to purpose of process memorandum section, references and key documents section added.
11/15/18	Emily Newell	Edits to references cited, laws and regulations table.
11/20/18	Emily Newell	Additional laws and regulations from socioeconomic technical report.
01/14/19	Emily Newell	Ready for project manager review.
8/4/19	Emily Newell	Update process memo for draft environmental impact statement section.
12/30/20	Chris Garrett	Final update for consistency prior to final environmental impact statement release.

### Purpose of Process Memorandum

In order to provide a concise and accessible summary of resource impacts, certain detailed information has not been included directly in the environmental impact statement (EIS). The purpose of this process memorandum is to describe additional supporting resource information in detail. The socioeconomics section of chapter 3 of the EIS includes brief summaries of the information contained in this process memorandum. This process memorandum covers four basic topics:

- Resource analysis area
- Analysis methodology
- Regulations, laws, and guidance
- References and key documents

# Detailed Information Supporting Environmental Impact Statement Analysis

#### Resource Analysis Area

The socioeconomic analysis focused primarily on the region informally known as the "Copper Triangle," which encompasses the location of the proposed mine, and most closely examined potential effects in the town of Superior, which is the closest community. Other communities within the Copper Triangle include the Queen Valley Census Designated Place (CDP), Cutter CDP, city of Globe, town of Hayden, town of Kearny, town of Miami, San Carlos CDP, Bylas CDP, Peridot CDP, Topof-the-World CDP, and town of Winkelman. Although most of the Copper Triangle is located in Pinal

and Gila Counties, Maricopa County was also included in the socioeconomic analysis because a substantial portion of the workforce for the proposed mine would be expected to commute from the Phoenix Metropolitan Area. Pima County is farther from the proposed mine and unlikely to be substantially affected by construction or operations but was included in the regional economic impact analysis (see section 3.13.4 of the final EIS) based on information indicating that suppliers in Pima County would likely provide goods and services to support mining activity.

#### **Analysis Methodology**

Modeling design. Due to limitations in zone improvement plan (ZIP) code—level data and the Economic Impact Analysis for Planning (IMPLAN) modeling system, assessing impacts at these varied levels of geography required the development and use of multiple IMPLAN models.

- County-based model. Effects across the broader study area were assessed using a county-based model. Direct effects would occur in Pinal County. The Pinal County model was linked to models for Gila County, Maricopa County, Pima County, and Graham County using IMPLAN's multiregional input-output (MRIO) analysis capability. This allowed BBC Research and Consulting (BBC) to estimate trade flows between these counties. Aggregate results for the broader study area were obtained by exporting the results from each county's model and summing them in Microsoft Excel.
- ZIP code—based model. Estimating more localized economic effects required the development and use of two models based on ZIP code—level geography. The MRIO capability of estimating trade flows between different areas is not available at the ZIP code level, due to limitations on ZIP code—level data and the corresponding inability to estimate trade flows between ZIP codes; however, IMPLAN does recommend a strategy for creating approximate MRIO analysis to estimate trade flows between areas using ZIP code data. BBC employed that strategy as follows:
  - Initially, a model was created for Superior alone, using the ZIP code that encompasses the town, and an impact analysis was run for that geography.
  - A model was then created that also included the other ZIP codes within the Copper Triangle, and the same impact analysis was run on that geography.
  - By subtracting the results from the first run from the results from the second run, it was
    possible to estimate the impacts on the remainder of the Copper Triangle (net of Superior).
  - By comparing the results from the second run to the results for Pinal and Gila Counties from the county-based model, the approximate effects in the non-Copper Triangle portions of those two counties could be estimated.

Full detail on analysis methodology for socioeconomics is available in "Socioeconomics Technical Report" (BBC Research and Consulting 2018), and the version updated for the final EIS (BBC Research and Consulting 2020).

# Regulations, Laws, and Guidance

Mining operations are subject to a wide range of Federal, State, and local requirements. Table 1 provides a summary of socioeconomic laws, regulations, policies, and plans at the Federal, State, and local level.

Table 1. Socioeconomic laws, regulations, policies, and plans at the Federal, State, and local level

Laws, Ordinances, Regulations, and Standards	Description	Applicability
U.S. Forest Service (Forest Service) "Economic and Social Analyses Handbook" (Forest Service Handbook 1909.17)	Provides guidelines to be used to evaluate socioeconomic impacts that may result from policy, program, plan, or project decisions on National Forest System lands.	Socioeconomic impacts as a result of the land exchanges and Resolution Copper Project General Plan of Operations are analyzed in this EIS.
Tonto National Forest Land Management Plan	Provides comprehensive management direction for resources on National Forest System lands. This includes plan direction for management, protection, and uses of Tonto National Forest. Monitoring conditions on the Tonto National Forest ensures projects are done in accordance with plan direction and identify conditions that might require a change in the forest plan.	One of the purposes of the forest plan is to be responsive to changing conditions of land and other resources and to changing social and economic demands of the American people.
Chapter 1970, Social and Economic Evaluation (Forest Service Manual 1970.1)	Directs how economic and social analyses should be conducted to aid Forest Service decision making.	Economic and social analyses performed as part of preparation of this EIS will follow direction by chapter 1970.1 of the Forest Service Manual.
Longitudinal Employer- Household Dynamics Program	Provides new dynamic information on workers, employers, and jobs with state-of-the-art confidentiality protections and no additional data collection burden.	Produces new, cost-effective, public-use information combining Federal, State, and Census Bureau data on employers and employees, providing the Forest Service with detailed local information about their economies so they may make an informed decision.

Laws, Ordinances, Regulations, and Standards	Description	Applicability
Arizona Revised Statutes (ARS) Section 42-17151, Property Taxes	Property taxes paid by Resolution Copper Mining LLC (Resolution Copper) on the mine itself.	Resolution Copper property taxes will be paid to Pinal County and other entities with property taxes authority of Resolution Copper's landholdings. Property taxes represent the single largest source of new government revenues from the proposed mining operations.
ARS Title 42, Chapter 5, Article 5, Severance Taxes	Severance taxes paid by Resolution Copper.	Severance taxes would be paid to the State of Arizona, with a portion shared to local governments based on income. As an operating mine, Resolution Copper would have the responsibility to pay severance taxes, producing substantial revenue for the State of Arizona.
ARS Section 43-1101 et seq., Corporate Income Taxes	Corporate income taxes paid by Resolution Copper.	Corporate income taxes would be paid by Resolution Copper to the State of Arizona, with a portion shared to cities based on population through Urban Revenue Sharing Fund. Corporate income taxes are estimated to provide \$1.7 billion in revenues to the State of Arizona over its anticipated life.
ARS Title 42, Chapter 5, Article 1, Transaction Privilege Taxes	Sales taxes paid by Resolution Copper.	Transaction privilege taxes would be paid to local governments and the State of Arizona, with a portion of the State revenues shared to local governments based on population. Transaction privilege taxes are the other primary source of local government revenues. These taxes may be levied against some of the purchases of goods by Resolution Copper as well as purchases by employees of the mine and employees whose jobs would be indirectly supported by the mine's activities.
ARS Section 43-1011, et seq., Employee Income Taxes	Income taxes paid by Resolution Copper employees.	Employees of Resolution Copper would be subject to state income tax, to be paid to the State of Arizona, with a portion shared to cities based on population through Urban Revenue Sharing Fund.
ARS Title 42, Chapter 11, Article 1, Employee Property Taxes	Property taxes paid by Resolution Copper employees.	Employees residing within Arizona would be subject to property taxes, to be paid to the jurisdictions in which the employees reside. Employee property taxes represent the final major source of government revenues related to the proposed mine.

### **Key Documents and References Cited for Socioeconomics**

The following list is meant to highlight key process or analysis documents available in the project record. It should not be considered a full list of all available documentation considered within this process memorandum or the EIS analysis.

- Arizona Auditor General. 2017a. Gila County: Annual Financial Report and Single Audit Report, Year Ended June 30, 2014. A report to the Arizona legislature. Phoenix, Arizona: State of Arizona Office of the Auditor General. June 29.
- ——. 2017b. Graham County: Annual Financial Report and Single Audit Report, Year Ended June 30, 2016. A report to the Arizona legislature. Phoenix, Arizona: State of Arizona Office of the Auditor General. March 30.
- Arizona Department of Transportation. 2016. Technical Advisory Committee (TAC) Meeting #2 Summary. Available at: https://www.azdot.gov/docs/default-source/para/superiorpas\_tac-meeting-2-summary.pdf?sfvrsn=4. Accessed November 3, 2018.
- Arizona Game and Fish Department. 2018. Report on Species of Economic Importance, Wildlife Related Recreation and Public Access within the Resolution Copper Mine Project Area. Phoenix, Arizona: Habitat, Evaluation and Lands Branch, Arizona Game and Fish Department. October 25.
- Arizona State Land Department. 2019. Mineral Management Program. Available at: https://land.az.gov/divisions/natural-resources/minerals. Accessed May 23, 2019.
- Arizona State University. 2016. Economic Impact of Off-Highway Recreation in the State of Arizona. Available at: https://www.americantrails.org/images/documents/AZ-OHV-Graphic-Report.pdf. Accessed May 23, 2019.
- BBC Research and Consulting. 2018. Socioeconomic Effects Technical Report: Resolution Copper Mine Environmental Impact Statement. Prepared for SWCA Environmental Consultants. Denver, Colorado: BBC Research and Consulting. November 12.
- ——. 2020. Socioeconomic Effects Technical Report 2020 Update. Prepared for SWCA Environmental Consultants Inc. Denver, Colorado: BBC Research and Consulting. September 14.
- Dean Runyan Associates. 2017. Arizona Travel Impacts 1998 2016p. Prepared for the Arizona Office of Tourism. Portland, Oregon: Dean Runyan Associates. June.
- ———. 2018. Arizona Travel Impacts 2000-2017p. Prepared for the Arizona Office of Tourism. Portland, Oregon: Dean Runyan Associates. June.
- Duthie Government Advisors. 2016. Town of Superior: Wastewater Rate Analysis. Duthie Government Advisors. October 25.
- Elliot D. Pollack and Company. 2011. Resolution Copper Company Economic and Fiscal Impact Report, Superior Arizona. Scottsdale, Arizona: Elliott D. Pollack and Company. September.
- Gibson, L. 2018. Personal communication, Levi Gibson, Pinal County Finance Director. May.

- Gila County Assessor's Office. 2017. Gila County Arizona data. Globe, Arizona: Gila County. August 13.
- HintonBurdick CPAs and Advisors. 2017. Town of Superior, Arizona: Annual Financial Statements and Independent Auditors' Report, Year Ended June 30, 2016. Prepared for the Town of Superior. Flagstaff, Arizona: HintonBurdick CPAs and Advisors. March 28.
- Jeavons, D. 2018. Summary of meeting with Superior Town Manager Todd Pryor. Memorandum. Denver, Colorado: BBC Research and Consulting. May 17.
- Logan Simpson Design Inc. 2009. Scoping Report US 60 Superior to Globe: MP 222.6 to MP 258.0. Federal Aid No. STP-060-D(AAL). ADOT Project No. 060 GI 222 H7162 01L. Prepared for Arizona Department of Transportation. Tempe, Arizona: Logan Simpson Design Inc. December.
- Maricopa County. 2017. Comprehensive Annual Financial Report, Maricopa County, Arizona: Fiscal Year Ended June 30, 2016. Phoenix, Arizona: Maricopa County Department of Finance. February 28.
- Minnesota IMPLAN Group Inc. 2016. IMPLAN Model Economic Overview for Zip Code 85173.
- Pinal County. 2016. Pinal County, Arizona: Comprehensive Annual Financial Report for the Fiscal Year Ended June 30, 2015. Florence, Arizona: Pinal County Finance Department. June 24.
- ——. 2020. Treasurer Parcel Inquiry. Area Code Rates. Available at: https://treasurer.pinalcountyaz.gov/ParcelInquiry/Main/AreaCodeRates. Accessed July 9, 2020.
- Pinal County Assessor's Office. 2017. Pinal County Arizona parcel data. Florence, Arizona: Pinal County. August 22.
- Resolution Copper. 2020a. Data Request #4 Updated Socioeconomic Data Part 2. Superior, Arizona: Resolution Copper. May 14.
- ——. 2020b. USFS Comment Response Data Request #4 Updated Socioeconomic Data Part 1. Skunk Camp and Filter Plant Data April 2020. Superior, Arizona: Resolution Copper. May 14.
- Silberman, J. n.d. [2003]. The Economic Importance of Off-Highway Vehicle Recreation: Economic Data on Off-Highway Vehicle Recreation for the State of Arizona and each Arizona County. Prepared for Arizona Game And Fish Department and Arizona State Parks. Phoenix, Arizona: School of Management, Arizona State University West.
- U.S. Census Bureau. 2000. American Fact Finder General Housing Characteristics: 2000. Arizona, Gila County, Globe, Graham County, Hayden, Maricopa County, Miami, Peridot, Pinal County, San Carlos, Superior, Winkelman. Census 2000 Summary File 1 (SF 1) 100-Percent Data. Available at: https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml. Accessed September 22, 2017.
- ———. 2015a. American Fact Finder Selected Economic Characteristics: Arizona, Bylas, Cutter, Gila County, Globe, Graham County, Hayden, Maricopa County, Miami, Peridot, Pinal County, San Carlos, Superior, Winkelman. 2011-2015 American Community Survey 5-Year Estimates.

——. 2015b. American Fact Finder - Selected Housing Characteristics: Arizona, Bylas, Cutter, Gila County, Globe, Graham County, Hayden, Maricopa County, Miami, Peridot, Pinal County, San Carlos, Superior, and Winkelman. 2011-2015 American Community Survey 5-Year Estimates. Available at: https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml? Accessed September 22, 2017.

Available at: https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml? Accessed

September 21, 2017.

- U.S. Forest Service. 1985. FSH 1909.17 Economic and Social Analysis. Washington, D.C.: U.S. Forest Service National Headquarters.
- ———. 2016a. Jobs and Income: Economic Contributions in 2016 at a Glance Tonto National Forest. Available at: https://apps.fs.usda.gov/nvum/results/A03012.aspx/FY2016. Accessed September 8, 2020.
- ———. 2016b. National Visitor Use Monitoring Program Tonto National Forest FY 2016. Available at: https://apps.fs.usda.gov/nvum/results. Accessed May 23, 2019.
- ———. 2023. *Tonto National Forest Land Management Plan: Coconino, Gila, Maricopa, Pinal, and Yavapai Counties, Arizona*. MB-R3-12-13. Phoenix, Arizona: Tonto National Forest. December.