
Process Memorandum to File

Addendum #2 to October 28, 2020 Process Memo “Cumulative Effects Analysis Overview and Screening by Resource”

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.

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Purpose of Process Memorandum

The purpose of this addendum is to update the process memorandum dated October 28, 2020, titled “Cumulative Effects Analysis Overview and Screening by Resource” (Newell et al. 2020). The original process memo served to outline the methods and screening results used for the analysis of cumulative effects within the environmental impact statement (EIS) prepared for the Resolution Copper Project by disclosing:

- Approach for addressing past and present actions in the EIS.
- Process used to identify valid reasonably foreseeable future actions (RFFAs).
- Summary of spatial analysis areas and temporal analysis time frames, by resource area.
- Screening of RFFAs by resource, and whether each RFFA should be assessed in the EIS cumulative effects analysis.

The October 28, 2020, process memo was updated through an additional process memo on February 23, 2023, titled “Addendum #1 to October 28, 2020, Process Memo ‘Cumulative Effects Analysis Overview and Screening by Resource’” (Debauche 2023). The purpose of the 2023 memo was to update the RFFAs evaluated in the final EIS (FEIS) in January 2021.¹ The purpose of this present memo is to again update the RFFAs since the last update occurred in February 2023. This includes the following:

- Evaluate the status of all previous RFFAs evaluated in the EIS, primarily to determine their continued applicability for inclusion within the EIS cumulative impact analysis.
- Identify any new projects that have been introduced after October 28, 2020, and evaluate their validity as RFFAs for cumulative analysis in the republished EIS.

Status Update of RFFAs Evaluated in the February 2023 Process Memo

Attachment 1 contains a detailed status update of the RFFAs evaluated in the January 2021 Rescinded Final EIS cumulative effects analyses, as amended in 2023 (Debauche 2023). The purpose of these reviews was to determine whether each identified cumulative project remained a valid RFFA for analysis within the republished EIS.

As provided in Attachment 1, while the status of several projects were updated, the projects remained appropriate for inclusion as RFFAs for cumulative effects analysis within the republished FEIS. One

¹ The draft EIS (DEIS) for the Resolution Copper Project was published in August 2019. After compiling and reviewing all public comments on the DEIS and undertaking necessary changes, the U.S. Forest Service (Forest Service) published a FEIS and draft record of decision (ROD) for the Resolution Copper Project on January 15, 2021. On March 1, 2021, the Secretary of Agriculture instructed the Forest Service to withdraw the notice of availability and rescind the FEIS and draft ROD. The Secretary indicated that this step was taken “to provide an opportunity for the agency to conduct a thorough review based on significant input received from collaborators, partners, and the public since these documents were released.”

project was removed as a valid RFFA for cumulative effects analysis within the republished EIS: Superior West Exploration.

Screening of Tonto Schedule of Proposed Actions

Attachment 2 contains a screening of the latest version of the Tonto National Forest Schedule of Proposed Actions (SOPA) for October through December 2024. In total, 34 items were reviewed. None of the SOPA items resulted in the inclusion of new RFFAs in the cumulative effects analysis.

Review of New Cumulative Projects for Inclusion as RFFAs within the Republished EIS Cumulative Effects Analysis

Attachment 3 contains a review of five new RFFAs identified within the EIS cumulative effects areas of geographic extent that warranted a review for inclusion in the cumulative effects analyses of the republished EIS. The purpose of these reviews is to determine whether any of the newly identified cumulative projects qualify as a valid RFFA for analysis within the republished EIS. Five projects were considered for RFFA status; these projects were brought to the attention of the NEPA team through a variety of methods, primarily news reports:

- Prismo Metals, Inc., Hot Breccia Property – minerals project;
- Copper Bullet Mines, Inc., Copper Springs – minerals project;
- Desert Fox Mineral Mountain Co. Mineral Mountain – minerals project;
- ASARCO Hayden Smelter restart;
- Minerals withdrawal of Town of Superior exchange lands.

Of these projects, only the Town of Superior exchange was considered to have adequate information to consider an RFFA. This potential RFFA was then screened for potential resource effects. While development of the Town of Superior exchange lands could potentially contribute to cumulative effects for many resources, the specific development plans are unknown at this time and insufficient information exists to analyze effects on most resources.

References

Debauche, S. 2023. *Addendum #1 to October 28, 2020 Process Memo “Cumulative Effects Analysis Overview and Screening by Resource.”* Process memorandum to file. Tucson, Arizona: SWCA Environmental Consultants. February 23.

Newell, E., K. Perry, and D. Morey. 2020. *Post-DEIS Update: Determination of Reasonably Foreseeable Actions Considered in Cumulative Effects Analysis.* Process memorandum to file. Phoenix, Arizona: SWCA Environmental Consultants. October 28.

ATTACHMENT 1

Status Update of RFFAs Evaluated in the January 2021 Rescinded Final EIS
Cumulative Effects Analysis, as updated in Debauche (2023)

Table A1. Descriptions of RFFAs carried forward into cumulative effects analysis and October 2024 update status

RFFA	Description	October 2024 Update Status
Arizona Department of Transportation (ADOT) Pinal County North-South Corridor	The project would include construction of a new freeway. While an exact route is being developed, the North-South Corridor spans 55 miles between U.S. Route 60 in Apache Junction (northern terminus) and Interstate 10 in Eloy (southern terminus), passing through the city of Coolidge, town of Florence, and portions of unincorporated Pinal County along the way. The study also incorporates the proposed extension of State Route (SR) 24 from Ironwood Drive to the North-South Corridor.	In 2023, ADOT separated the north-south corridor project into two segments and initiated environmental and engineering studies (Tier 2 studies). These studies are anticipated to take several years to complete. The status of this RFFA remains unchanged.
ADOT Vegetation Treatment	ADOT plans to conduct annual treatment programs using U.S. Environmental Protection (EPA)-approved herbicides to contain, control, or eradicate noxious, invasive, and native plant species that pose safety hazards or threaten native plant communities on road easements and National Forest System (NFS) lands up to 200 feet beyond road easement on the Tonto National Forest.	It is reasonable to assume that ADOT will continue to conduct vegetation treatments within the Tonto National Forest during the expected life of the Resolution Copper Project (50 to 55 years). The status of this RFFA remains unchanged.
Arizona Game and Fish Department (AGFD) Wildlife Water Catchment Improvement Projects	Longer-term cooperative effort between the Tonto National Forest and AGFD to improve wildlife habitat throughout the Tonto National Forest. The project includes the installation of up to four water catchment arrays (including water storage tanks, a large “apron” to gather and direct precipitation to the storage tanks, drinking trough, and fencing) that would disturb no more than 0.5 acre. The project specifically benefits mule deer populations (although access to water provided by the catchments would also benefit elk, javelina, Gambel’s quail, and other species).	As noted in 2023, there is currently an informal moratorium on constructing these catchments in favor of repairing existing catchments. However, AGFD noted that they were not canceled, merely on hold. It is reasonable to assume that, while not currently funded, these catchments may be constructed in the future. The status of this RFFA remains unchanged.
Apache-Sitgreaves National Forests Public Motorized Travel Management Plan	A proposal to designate motorized travel routes (roads and trails) in areas on Federal lands administered by the Forest Service within the Apache-Sitgreaves National Forests in order to comply with the Travel Management Rule (36 Code of Federal Regulations 212).	The Apache-Sitgreaves National Forest Schedule of Proposed Actions (SOPA) indicates that the Final EIS was anticipated in August 2024, with decision and implementation late in 2024. However, a search of the Federal Register indicates that the notice of availability for the FEIS has not been published and the Forest Service decision on the management

RFFA	Description	October 2024 Update Status
		plan has not yet occurred. The status of this RFFA remains unchanged.
Arizona Public Service Company (APS) Herbicide Use within Authorized Power Line Rights-of-Ways (ROWs) on NFS lands	APS has proposed to include Forest Service–approved herbicides as a method of vegetation management, in addition to existing vegetation treatment methods, on existing APS transmission ROWs. The existing transmission ROWs are within five National Forests: Apache-Sitgreaves, Coconino, Kaibab, Prescott, and Tonto National Forests. The Forest Service must decide whether to allow this herbicide use. If approved, the use of herbicides as well as currently authorized treatments would become part of the APS Integrated Vegetation Management approach.	It is reasonable to assume APS is currently using these herbicides along ROWs near the project area, as needed, and would continue to do so during the expected life of the Resolution Copper Project (50 to 55 years). The status of this RFFA remains unchanged.
ASARCO Mine, including the Hayden Concentrator and Smelter, and Superfund Site	<p>The Ray Mine operations consist of a 250,000-ton/day open-pit mine with a 30,000-ton/day concentrator, a 103-million-pound/year solvent extraction-electrowinning operation, associated maintenance, warehouse, and administrative facilities. Cathode copper produced in the solvent extraction and electrowinning operation is shipped to outside customers and to the ASARCO Amarillo Copper Refinery.</p> <p>A local railroad, Copper Basin Railway, transports ore from the mine to the Hayden concentrator, concentrate from the Ray concentrator to the smelter, and sulfuric acid from the smelter to the leaching facilities.</p> <p>The ASARCO Hayden Plant Superfund site is located 100 miles southeast of Phoenix and consists of the towns of Hayden and Winkelman and nearby industrial areas, including the ASARCO smelter, concentrator, former Kennecott smelter and all associated tailings facilities in the area surrounding the confluence of the Gila and San Pedro Rivers. Site investigation and sampling work are ongoing and will be used to develop the cleanup approach for the area. The site is not listed on the National Priorities List, but is considered to be a National Priorities List–caliber site and is being</p>	<p>A search of the Arizona Department of Environmental Quality (ADEQ) website identified no updates to the various actions, and the mine remains permitted to operate through 2044. It is reasonable to assume Ray Mine will continue to operate and/or be decommissioned during the expected life of the Resolution Copper Project (50 to 55 years). The status of this RFFA remains unchanged.</p> <p>Note that the potential for restarting the Hayden smelter is a specific new RFFA considered in this process memo.</p>

RFFA	Description	October 2024 Update Status
	addressed through the Superfund Alternatives Approach.	
Drake Limestone Quarry Expansion	The Prescott National Forest is proposing to approve an amendment to Drake Cement LLC's existing plan of operations to allow Drake Cement to expand its existing quarry operations on an additional 287 acres of NFS lands.	The decision on the original expansion was signed in November 2020. Operations are estimated to continue for 35 years to meet current and projected regional needs for limestone used in the production of cement. It is reasonable to assume the expansion area is now part of the overall Drake Limestone Quarry operations, which would continue throughout the expected life of the Resolution Copper Project. In addition, there is a new mine component being considered on the Prescott National Forest SOPA for using 10 acres of Prescott NFS lands adjacent to the company's private land to accommodate a materials sorting yard and stockpile area for biomass fuels material residue storage. The status of this RFFA is updated, but it remains appropriate for analysis in the FEIS.
Florence Copper In-Situ Mining Project	The Florence Copper In-Situ copper recovery facility near the town of Florence produces copper through underground injection and recovery. The production test facility was constructed in 2017 and is currently in operation. ADEQ issued a draft aquifer protection permit (APP) on August 6, 2020, which is one of two key permits required to advance to commercial production.	Florence Copper has now received all environmental permits required to operate. The Final APP was issued by ADEQ in December 2020 and the Underground Injection Control (UIC) permit was issued by the EPA in September 2023. Full life of mine, according to company fact sheets, will be approximately 25 years, including 2 years of core facilities construction, approximately 20 years of commercial/operational life, and 1 to 2 years of site closure and reclamation. A reasonable assumption is that the mine would operate throughout the expected life of the Resolution Copper Project. The status of this RFFA is updated, but it remains appropriate for analysis in the FEIS.
Grazing Allotment Permit Renewals (Various)	In total, 16 grazing allotments were identified on Forest Service, BLM, or Arizona State Trust lands, for which allotment analysis would be conducted to determine reissuance of term grazing permits.	This RFFA would renew existing grazing leases and continue grazing uses within the allotment involving the same acres and animal unit months (AUMs). Minor and localized impacts would be addressed via active management by way of permit renewal requirements and range allotment management plans. A reasonable assumption is that grazing would continue, and range improvements would be implemented throughout the expected life of the Resolution Copper Project (50 to 55 years). The status of this RFFA remains unchanged.

RFFA	Description	October 2024 Update Status
LEN Range Improvements	Re-drill 11 existing wells and equip them with solar pumps, storage tanks, and water troughs. Some may have water lines going to troughs at locations away from the storage tank. The roads on the allotment are in disrepair and are not passable in anything but high-clearance 4-wheel drive vehicles. The roads will need to be maintained to allow drilling equipment into the project sites to re-drill the existing wells.	According to the Bureau of Land Management (BLM) ePlanning website, this project has been paused, but not cancelled. At this time, while the range improvement activities are on hold, it is expected they would be completed at some time in the future to ensure range health. The status of this RFFA remains unchanged.
LG Energy Solution Battery Production Facility Project	The developer has purchased a 650-acre site at Germann Road and Ironwood Drive in the town of Queen Creek from an Arizona State Land Department auction to build a 1.4-million-square-foot advanced cylindrical battery manufacturing facility.	Facility construction began in early 2024 and is anticipated to be completed by late 2025. The status of this RFFA remains unchanged.
Merrill Ranch Master Planned Community Project	The developer has purchased two parcels in Florence, Arizona, totaling 4,150 acres to develop a master-planned community with 12,000 homes and industrial, commercial, and retail components.	Construction has not yet begun on the master-planned community. The status of this RFFA remains unchanged.
Oak Wells Wind Project	While currently in the exploration phase, the developer is proposing a 300-megawatt (MW) wind farm with up to 83 wind turbines. The developer has been evaluating a roughly 44,000-acre “area of interest” in Pinal County about 30 miles north of Tucson.	Construction has not yet begun on the wind farm. The status of this RFFA remains unchanged.
Pine Creek Mining River Bend Placer Project	This project would include gold mining operations on approximately 48 acres (10 acres in the Red Hill #2 placer mining claim and 38 acres in the Riverbend placer mining claim), with an additional 4 acres for processing facilities, settling ponds, and roads.	According to the latest Prescott National Forest SOPA, this project remains on hold, but not canceled. The status of this RFFA remains unchanged.
Pinto Valley Mine Expansion	The Pinto Valley Mine is an existing open-pit copper and molybdenum mine located approximately 8 miles west of Miami, Arizona, in Gila County. Pinto Valley Mining Corp. has an approved mine plan of operations to expand mining activities onto the Tonto National Forest, extend the mine life to 2039, and to consolidate previous and ongoing authorizations for the mine. The project would result in an estimated 1,316 acres of new disturbance (229 acres on Tonto National Forest land	It is reasonable to assume operation of the expanded mine will occur through 2039, within the expected life of the Resolution Copper Project. The status of this RFFA remains unchanged.

RFFA	Description	October 2024 Update Status
	and 1,087 acres on private land owned by Pinto Valley Mining Corp.).	
Ray Land Exchange and Proposed Plan Amendment*	As originally proposed in 1994 to BLM by ASARCO, a land exchange between the two parties would include conveyance of approximately 10,976 acres of public lands and federally owned mineral estate located near ASARCO's Ray Mine Complex in east-central Arizona to ASARCO. In exchange for these Federal lands, the BLM would acquire approximately 7,304 acres of private lands, primarily in northwestern Arizona, that possess resource qualities considered to be of significant value to the public.	The land exchange is complete and it is reasonable to assume activities associated with Ray Mine's use of the 10,976 acres will occur within the expected life of the Resolution Copper Project. The status of this RFFA remains unchanged.
Ripsey Wash Tailings Project	ASARCO is proposing to construct a new tailings storage facility to support its Ray Mine operation. The tailings facility would include two starter dams, new pipelines to transport tailings and reclaimed water, a pumping booster station, a containment pond, a pipeline bridge across the Gila River, and other supporting infrastructure. A segment of the Arizona National Scenic Trail would be relocated east of the tailings storage facility. A section of Florence-Kelvin Highway and a power line would be rerouted. The proposed tailings storage facility, situated within the Ripsey Wash watershed, would be located on 2,627 acres of private lands and 9 acres of BLM lands.	This project has been approved and it is reasonable to assume activities associated with the tailings project would occur within the expected life of the Resolution Copper Project. The status of this RFFA remains unchanged.
Silver Bar Mining Regional Landfill and Cottonwood Canyon Road	AK Mineral Mountain, LLC, NL Mineral Mountain, LLC, POG Mineral Mountain, LLC, SMT Mineral Mountain, LLC, and Welch Mineral Mountain, LLC, proposed to build a municipal solid waste landfill on private property surrounded by BLM land in an area known as the Middle Gila Canyons area.	This landfill has been operational since 2019 and is expected to remain operational (until capacity has been reached) within the expected life of the Resolution Copper Project. The status of this RFFA remains unchanged.
Superior West Exploration Project	Bronco Creek Exploration proposes to conduct exploratory drilling at locations immediately west and south of the town of Superior, Arizona, on lands managed by the Tonto National Forest. Bronco Creek Exploration has identified a total of 79 sites in the area as potential drilling locations; of these, a maximum of 25 sites would ultimately be drilled over a 10-year	The Superior West exploration project has been canceled. This RFFA is being removed from analysis in the FEIS.

RFFA	Description	October 2024 Update Status
	period, with decision-making on specific additional sites for drilling determined by analysis of core, cuttings, and other results from sites previously drilled.	
Superior to Silver King 115-kV Relocation Project	This project involves the relocation of a segment of the existing Superior-Silver King 115-kilovolt (kV) transmission line on Resolution Copper private property near Superior.	It is reasonable to assume this project would still be necessary to accommodate the Resolution Copper Project. As it is only necessary prior to operation of the Resolution Copper Project, it is reasonable to assume construction activities could overlap. The status of this RFFA remains unchanged.
Tonto National Forest Travel Management Plan	The Tonto National Forest travel management plan establishes the system of roads, trails, and areas designated for motorized vehicle use and determines suitable locations for dispersed camping.	The travel management plan was approved and it is reasonable to assume the approved travel management activities will occur throughout the expected life of the Resolution Copper Project. The status of this RFFA remains unchanged.
Wild and Scenic River Eligibility Study	The Tonto National Forest has identified the linked segments of Arnett Creek and Telegraph Canyon as eligible for inclusion in the National Wild and Scenic Rivers System (U.S. Forest Service 2017). The river segments offer unique and outstandingly remarkable scenery and fisheries values.	The ROD for the eligibility study was signed in 2022, and eligibility of Arnett Creek and Telegraph Canyon was incorporated into the 2023 “Tonto National Forest Land Management Plan.” It is reasonable to assume that these segments may become part of the National Wild and Scenic Rivers System within the expected life of the Resolution Copper Project. The status of this RFFA is updated, but it remains appropriate for analysis in the FEIS.

* The BLM approved a land exchange with ASARCO near the Ray Mine in May 2020. ASARCO has not provided a mine plan of operations for these areas for us to consider. In lieu of a proposed plan of operations, it is assumed for this analysis that the existing mining impacts at the Ray Mine would continue for the private property ASARCO owns and is able to mine.

Literature Cited

U.S. Forest Service. 2017. *Tonto National Forest Draft Wild and Scenic Rivers Eligibility Study*. Phoenix, Arizona: U.S. Forest Service. October.

ATTACHMENT 2

Screening of Tonto National Forest Schedule of Proposed Actions

Table B-1. Screening of items on Tonto National Forest Schedule of Proposed Actions (10/1/24–12/31/24)

SOPA Item	Applicability as Potential RFFA
Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System	This land management plan is related to the entire NFS. No old-growth forest conditions exist in the general project area. This item is not applicable as a potential RFFA.
Locatable Mining Rule - 36 CFR 228, subpart A.	<p>The SOPA indicates that this item is currently on hold, and no DEIS has been released. This item is not applicable as a potential RFFA.</p> <p>A similar determination was made previously by the Tonto National Forest, based on an assessment that this is not a defined action but revision to agency regulations, with an unknown outcome and no defined effects (SWCA Environmental Consultants (SWCA) 2020:2-12).</p>
Arizona National Scenic Trail Comprehensive Plan	<p>This plan will establish the administrative objectives, policies, processes, and management guidelines necessary to fulfill the legislative requirements for national scenic trails under the National Trails System Act. The DEIS and draft Arizona National Scenic Trail Comprehensive Plan were released in February 2024; no FEIS or ROD have yet been published. The specific desired conditions and management guidelines contained within the draft comprehensive plan could change based on the outcome of public comment and objections prior to implementation and therefore cannot be analyzed for cumulative effects. This item is not applicable as a potential RFFA.</p> <p>A similar determination was made previously by the Tonto National Forest, based on an assessment that all impacts are either beneficial or negligible (SWCA 2020:3-7).</p> <p>However, note that at this time, management of the Arizona National Scenic Trail is specifically guided by the “Tonto National Forest Land Management Plan,” and the consistency of the project with those plan components is part of the forest plan consistency analysis.</p>
Prescott College Academic Outfitter and Guide Priority Use (2015–2025)	The SOPA indicates that this item is currently on hold, and no environmental analysis has been released. This item is not applicable as a potential RFFA.
DW Tower Lion Canyon and Callahan Communications Site	This item involves two new communication sites that would be built along SR 87, near Jakes Corner, south of Payson, Arizona. This is roughly 40 to 50 miles from the Resolution Copper Project. This is a new listing on the SOPA with no details available yet to the public. While this area lies within at least three cumulative effects analysis areas (air quality, socioeconomics, and wildlife), the installation of two communication sites at this distance would be anticipated to have negligible effects when combined with project effects. This item is not applicable as a potential RFFA.
North Zone 2019 Range Betterment Project	The SOPA indicates that this item is currently on hold, and no environmental analysis has been released. This item is not applicable as a potential RFFA.

SOPA Item	Applicability as Potential RFFA
Tonto East Abandoned Mine Lands Project	<p>This item involves the closure of 61 abandoned mine features on the Tonto National Forest, including shafts, adits, prospects, and wells. Proposed closure methods include backfill, polyurethane foam, bat-compatible fencing, or posting warning signs. Some sites may be left as is, depending on public safety concerns or impacts to resources. Many of these features fall within the cumulative effect analysis areas for multiple resources. Scoping was conducted on this project in April 2024, but no environmental analysis has been released.</p> <p>The project has been designed to comply with the “Tonto National Forest Land Management Plan,” with specific project design features intended for resource protection, including measures related to wildlife, plants, noxious weeds, soils, watershed, safety, and transportation.</p> <p>The impacts at any given site are not known; however, given the beneficial effects of the closures and the project design features, resource impacts on a feature-by-feature basis are likely to be negligible. As such, this item is not applicable as a potential RFFA.</p>
West Verde Firescape Project	<p>This item involves fuels and fire management using a variety of fire and non-fire treatments to improve vegetation conditions, north of Cave Creek, Arizona. In addition to the continued use of naturally occurring unplanned ignitions when conditions permit, this project proposes the use of planned prescribed fire and different types of mechanical vegetation treatments, such as thinning and mastication. This project falls within or partially within the cumulative effects analysis areas for several resources (air quality, socioeconomics, and wildlife).</p> <p>Similar vegetation or fire management projects were previously screened by the Tonto National Forest as part of the Resolution Copper Project and determined on the balance to have beneficial or negligible impacts and therefore were not carried forward for cumulative effects analysis (SWCA 2020:10). Consistent with the same rationale, this item is not applicable as a potential RFFA.</p>
AT&T Signal Peak Antenna Collocation onto an Existing Tower	<p>The SOPA indicates that this item is currently on hold, and no environmental analysis has been released. This item is not applicable as a potential RFFA.</p>
Dragon's Tail Exploratory Drilling Project	<p>This item involves an exploration drilling project approximately 6 miles northeast of Superior, Arizona. Drilling could happen at up to seven of 12 drilling sites. The project was approved in September 2024 and must be completed within 1 year. This project is unlikely to temporally overlap the Resolution Copper Project. As such, this item is not applicable as a potential RFFA.</p>
Forest Service Road 287 Partial Realignment Project	<p>This project would realign a portion of NFS Road 287 from the private mine property to NFS land west of Pinto Valley Mine to provide a safer route for forest users visiting the area away from mining vehicles, equipment, and activities. The project was approved in September 2024 under a categorical exclusion after determining that no extraordinary circumstances existed and taking into account resource protections. This project falls within or partially within several cumulative effect areas but is unlikely to temporally overlap the</p>

SOPA Item	Applicability as Potential RFFA
	Resolution Copper Project. As such, this item is not applicable as a potential RFFA.
Globe Wildland Urban Interface Project	<p>This project would use prescribed fire, wildfire, and mechanical vegetation treatments across a total of 80,437 on the Globe Ranger District in collaboration with the San Carlos Apache Tribe who is treating adjacent Tribal lands.</p> <p>Similar vegetation or fire management projects were previously screened by the Tonto National Forest as part of the Resolution Copper Project and determined on the balance to have beneficial or negligible impacts and therefore were not carried forward for cumulative effects analysis (SWCA 2020:10). Consistent with the same rationale, this item is not applicable as a potential RFFA.</p>
Hicks-Pikes Peak Allotment Grazing Authorization	This item is already included in the cumulative effects analysis as an RFFA, grouped with approvals of other grazing permits.
Picket Post Improvements Project	<p>This project would improve two existing undefined parking areas by delineating a boundary with pipe rail fence and designating them as overflow parking sites. The project was approved in July 2024 under a categorical exclusion after determining that no extraordinary circumstances existed and taking into account resource protections.</p> <p>This project falls within or partially within several cumulative effect areas but is unlikely to temporally overlap the Resolution Copper Project. As such, this item is not applicable as a potential RFFA.</p>
Salt River Fuels Project	<p>This project would use prescribed fire, wildfire, and/or mechanical vegetation treatment across a total area of approximately 115,684 acres of the Globe Ranger District in coordination with San Carlos Apache Tribe, who is treating adjacent Tribal lands.</p> <p>Similar vegetation or fire management projects were previously screened by the Tonto National Forest as part of the Resolution Copper Project and determined on the balance to have beneficial or negligible impacts; therefore, they were not carried forward for cumulative effects analysis (SWCA 2020:10). Consistent with the same rationale, this item is not applicable as a potential RFFA.</p>
State Route 88 (Apache Trail) Road Repair Project	<p>The purpose of this project is to authorize ADOT to repair and mitigate damage to approximately 1.5 miles of SR 88 to allow the roadway to be reopened by ADOT to four-wheel-drive, high-clearance vehicles, and utility terrain vehicles (UTVs). The project was approved in July 2024 under a categorical exclusion after determining that no extraordinary circumstances existed and taking into account resource protections.</p> <p>This project falls within or partially within several cumulative effect areas but was completed and the road reopened in September 2024. Therefore, it does not temporally overlap the Resolution Copper Project, and this item is not applicable as a potential RFFA.</p>
Boulders Area Trail System	<p>The purpose of this project is to begin to develop the Boulders Area Trail System by constructing and maintaining these new trails along with adding two new trailheads, south of Payson, Arizona. This is a new listing on the SOPA with no details available yet to the public. While this area lies within at least three cumulative effects analysis areas (air</p>

SOPA Item	Applicability as Potential RFFA
	quality, socioeconomics, and wildlife), the construction of trails at this distance would be anticipated to have negligible effects when combined with project effects. While this item could have effects on recreation resources, it falls outside the cumulative effects analysis area for this resource. This item is not applicable as a potential RFFA.
Canyon Creek Fish Hatchery Fence Line	This project would create a more secure facility for the AGFD Fish Hatchery and implement better safety practices for the public and reduce the chance for pathogens or aquatic invasive species to be introduced to the vulnerable fish rearing units. This project falls outside any of the cumulative effects analysis areas and therefore is not applicable as a potential RFFA.
Pine Canyon Restoration Project Phase III	<p>The project goal is to meet the desired conditions for stands of ponderosa pine and mixed conifer given an overabundance of fire intolerant conifer species. This is a new listing on the SOPA, with no details available yet to the public. This project occurs at the far margin of two cumulative effects analysis areas (wildlife, socioeconomics).</p> <p>Similar vegetation or fire management projects were previously screened by the Tonto National Forest as part of the Resolution Copper Project and determined on the balance to have beneficial or negligible impacts; therefore, they were not carried forward for cumulative effects analysis (SWCA 2020:10). Consistent with the same rationale, this item is not applicable as a potential RFFA.</p>
Pine Strawberry Trail System Additions	This project will enhance and continue to add to the existing sustainable and designated nonmotorized trail system in and around the communities of Pine and Strawberry. This is a new listing on the SOPA, with no details available yet to the public. While this area lies within two cumulative effects analysis areas (socioeconomics and wildlife), the construction of trails at this distance would be anticipated to have negligible effects when combined with project effects. While this item could have effects on recreation resources, it falls outside the cumulative effects analysis area for this resource. This item is not applicable as a potential RFFA.
South Green Valley Parkway Project	The SOPA indicates that this item is currently on hold, and no environmental analysis has been released. This item is not applicable as a potential RFFA.
FSH 512 Repair	This project includes paving and road realignment of NFS Road 512 near Young, Arizona. While this area lies within two cumulative effects analysis areas (socioeconomics and wildlife), the construction of the road is anticipated to begin in 2024 and will take 9 months. Therefore, it likely does not temporally overlap with the Resolution Copper Project, and this item is not applicable as a potential RFFA.
Bathtub Corral	<p>The purpose of this project is to add a small corral with a trigger gate that allows livestock to use the water trough at this location while in the pasture but then can be trapped in the corral and hauled out of the pasture when required. The project was approved in June 2024 under a categorical exclusion after determining that no extraordinary circumstances existed and taking into account resource protections.</p> <p>This project falls within or partially within several cumulative effect</p>

SOPA Item	Applicability as Potential RFFA
	areas but is unlikely to temporally overlap the Resolution Copper Project. Therefore, this item is not applicable as a potential RFFA.
Dutch Tin Extension Project	The purpose of this project is to add additional water resources for the Dutch Woman East grazing allotment. This is roughly 30 to 40 miles from the Resolution Copper Project. While this area lies within several cumulative effects analysis areas (air quality, socioeconomics, and wildlife), the improvement of water sources at this distance would be anticipated to have negligible effects when combined with project effects, with the exception of livestock grazing, and this project does not fall within the livestock grazing cumulative effects analysis area. Therefore, this item is not applicable as a potential RFFA.
East Fork Spring to Bladder Pipeline	The purpose of this project is to install a water pipeline between East Spring Fork and the Bladder well which is being depleted of water, on the Dagger grazing allotment. This is a new listing on the SOPA with no details available yet to the public. This is roughly 40 to 50 miles from the Resolution Copper Project. While this area lies within several cumulative effects analysis areas (socioeconomics and wildlife), the improvement of water sources at this distance would be anticipated to have negligible effects when combined with project effects, with the exception of livestock grazing. Therefore, this project does not fall within the livestock grazing cumulative effects analysis area. Thus, this item is not applicable as a potential RFFA.
Holder Well and Corral Expansion Project	This project involves a new well will be drilled to provide adequate water for livestock on the Hardt Creek grazing allotment, south of Rye, Arizona. The project was approved in May 2024 under a categorical exclusion after determining that no extraordinary circumstances existed and taking into account resource protections. This project falls within or partially within several cumulative effect areas but is unlikely to temporally overlap the Resolution Copper Project. As such, this item is not applicable as a potential RFFA.
Lake Roosevelt Recreation Site Decommission Project	This project involves the decommissioning of three loops of camping sites, five fish cleaning sites, and four entry fee stations located at Lake Roosevelt. This is a new listing on the SOPA, with no details available yet to the public. While this area lies within several cumulative effects analysis areas (air, socioeconomics, and wildlife), the construction of trails at this distance would be anticipated to have negligible effects when combined with project effects. This item could have effects on recreation resources. Two of the named campgrounds fall outside the cumulative effects analysis area for this resource. Two other campgrounds are at the margins of the cumulative effects analysis area for recreation resources, on the south side of Lake Roosevelt. Without specific plans for the decommissioning, there is insufficient detail to analyze impacts to recreation resources at this time. Therefore, this item is not applicable as a potential RFFA.
Long Mesa Targeted Grazing	The goal would be to protect Sonoran Desert vegetation by reducing herbaceous annual vegetation along highway 188 so that any fire starts does not spread.

SOPA Item	Applicability as Potential RFFA
	Similar vegetation or fire management projects were previously screened by the Tonto National Forest as part of the Resolution Copper Project and determined on the balance to have beneficial or negligible impacts; therefore, they were not carried forward for cumulative effects analysis (SWCA 2020:10). Consistent with the same rationale, this item is not applicable as a potential RFFA.
Octagon Towers - Roosevelt Lake Comm Site Upgrade	This project is to upgrade and improve existing communications facilities at Octagon Towers, near Lake Roosevelt. This is roughly 20 to 30 miles from the Resolution Copper Project. While this area lies within several cumulative effects analysis areas (air quality, socioeconomics, wildlife, recreation), the upgrade of existing communication site at this distance would be anticipated to have negligible effects when combined with project effects. This item is not applicable as a potential RFFA.
SRP Pump Back Storage Project - Geotechnical Investigation Site 2	This project includes geotechnical investigation involving surface geophysical surveys, exploratory drilling, and excavation of test pits, near Lake Roosevelt. This is roughly 20 to 30 miles from the Resolution Copper Project. Similar exploration projects previously screened by the Tonto National Forest on the Resolution Copper Project were determined to be primarily applicable with respect to noise and transportation/access resources. While this area lies within several cumulative effects analysis areas (air quality, socioeconomics, wildlife, recreation), it does not fall within the noise or transportation cumulative effects analysis areas. Therefore, this item is not applicable as a potential RFFA.
Seventy-Six Ranch Project #2	This project involves a new water storage tank and troughs on the Seventy-Six grazing allotment. The project was approved in May 2024 under a categorical exclusion after determining that no extraordinary circumstances existed and taking into account resource protections. This project falls within or partially within several cumulative effect areas but is unlikely to temporally overlap the Resolution Copper Project. Thus, this item is not applicable as a potential RFFA.
TDS-Roosevelt Lake Marina Fiber	This project is to the installation of fiber-optic broadband infrastructure to the Roosevelt Lake Marina. This is roughly 20 to 30 miles from the Resolution Copper Project. This is a new listing on the SOPA, with no details available yet to the public. This project falls within or partially within several cumulative effect areas, but without specific plans for the installation, there is insufficient detail to analyze impacts to any resources at this time. Therefore, this item is not applicable as a potential RFFA.
Water Users Connection Pipeline	This project will connect the Water Users spring and pipeline system to the Two Prong pipeline system. This is roughly 20 to 30 miles from the Resolution Copper Project. This is a new listing on the SOPA, with no details available yet to the public. This project falls within or partially within several cumulative effect areas, but without specific plans for the installation, there is insufficient detail to analyze impacts to any resources at this time. As such, this item is not applicable as a potential RFFA.

SOPA Item	Applicability as Potential RFFA
Windy Hill ADA Access	This project involves construction of Americans with Disabilities Act (ADA) approved ramp for lake access to Roosevelt Lake. This is roughly 20 to 30 miles from the Resolution Copper Project. This is a new listing on the SOPA, with no details available yet to the public. This project falls within or partially within several cumulative effect areas, but without specific plans for the installation, there is insufficient detail to analyze impacts to any resources at this time. Therefore, this item is not applicable as a potential RFFA.

Literature Cited

SWCA Environmental Consultants (SWCA). 2020. *Cumulative Effects Analysis Overview and Screening by Resource*. Process memorandum to file. Phoenix, Arizona: SWCA Environmental Consultants. October 28.

ATTACHMENT 3

Review of New Cumulative Projects for Inclusion as RFFAs within the
Republished EIS Cumulative Effects Analysis

Prismo Metals Inc. Hot Breccia Property

Overview of RFFA

The Hot Breccia Property is a minerals project being advanced by Prismo Metals Inc. The project is located approximately 25 miles southeast of the proposed Resolution Copper Project, near the Christmas Mine and Hayden Smelter. The project encompasses roughly 3,500 acres over 227 unpatented claims, on land administered by the BLM.

In 2023 the company completed an airborne geophysical survey, compiled historical data, and in July 2024 reportedly obtained a permit from the BLM for conducting drilling operations. However, there does not appear to be a record of the project on the BLM's ePlanning website, and no additional details on the drilling plans are available, including geographic area and time frame. Prismo Metals Inc. reports that drilling would begin in the third quarter 2024, with an unknown duration.

Rationale for Resource Analysis—Temporal Overlap with Resolution Copper Project

The timing of this project is currently unknown. However, it is likely that the completion of this drilling is likely to occur before development of the Resolution Copper Project.

Rationale for Resource Analysis—Spatial Overlap with Resolution Copper Project

This RFFA would be approximately 25 miles southeast of project areas shared by all action alternatives (2–6) and falls within the spatial rationale for at least some resources presented within chapter 4 of the FEIS (Table 4.3-1, Cumulative effects spatial analysis areas for cumulative effects, and preferred and proxy impact metrics).

Rationale for Analysis as Cumulative Effect in EIS

This potential RFFA lacks sufficient detail to analyze for exploration impacts, and no plans of operation have been developed for further development and operation. While there is uncertainty about timing, the drilling activities are reportedly starting now and are unlikely to overlap temporally the Resolution Copper Project. This potential RFFA was not carried forward for further analysis in the cumulative effects section of the FEIS.

Literature Cited

Prismo Metals Inc. 2023. The Hot Breccia Property. Available at: <https://prismometals.com/project/the-hot-breccia-property>. Accessed October 18, 2024.

Prismo Metals Inc. 2024. Prismo Metals Secures Permit Approval for Deep Drilling Program at Hot Breccia Copper Project in Arizona. Available at: <https://prismometals.com/prismo-metals-secures-permit-approval-for-deep-drilling-program-at-hot-breccia-copper-project-in-arizona>. Accessed October 21, 2024.

Copper Bullet Mines, Inc. Copper Springs

Overview of RFFA

Copper Springs is a minerals project being advanced by Copper Bullet Mines, Inc. The project is located approximately 10 miles east-northeast of the proposed Resolution Copper Project, in the Pinal Mountains south of Miami, Arizona. The project encompasses roughly 2,400 acres over 126 unpatented claims, on land administered by the Tonto National Forest.

At this time, the company appears to have compiled historical information but not proceeded with further exploration. No known plans were identified for either exploration or operations, and the project does not appear on the Tonto National Forest Schedule of Proposed Actions (SOPA).

Rationale for Resource Analysis—Temporal Overlap with Resolution Copper Project

The timing of this project is currently unknown.

Rationale for Resource Analysis—Spatial Overlap with Resolution Copper Project

This RFFA would be approximately 10 miles east-northeast of project areas shared by all action alternatives (2–6), and falls within the spatial rationale for at least some resources presented within chapter 4 of the FEIS (Table 4.3-1, Cumulative effects spatial analysis areas for cumulative effects, and preferred and proxy impact metrics).

Rationale for Analysis as Cumulative Effect in EIS

This potential RFFA lacks sufficient detail to analyze and was not carried forward for further analysis in the cumulative effects section of the FEIS.

Literature Cited

Sheehan, L., and M. Feinstein. 2022. *Technical Report, Copper Springs Project, Gila County, Arizona* USA. NI 43-101. Prepared for Copper Bullet Mines Inc. Mesa and Tucson, Arizona. January 20.

Global Business Reports. 2024. Western USA Mining 2024. 33 Copper Bullet Mines Interview. Available at: <https://projects.gbreports.com/western-usa-mining-2024/copper-bullet-mines-interview>. Accessed October 18, 2024.

Desert Fox Mineral Mountain Co. Mineral Mountain Project

Overview of RFFA

Mineral Mountain is a minerals project being advanced by Desert Fox Mineral Mountain Co. The project is located approximately 15 miles southwest of the proposed Resolution Copper Project. The project reportedly includes two Arizona Mineral Exploration Permits and 260 unpatented mining claims covering approximately 6,500 acres administered by the State of Arizona and BLM.

At this time, the company appears to have completed geophysical surveys and surface mapping but not proceeded with further exploration. A plan of operations has reportedly been submitted to the BLM but is not present on the ePlanning website and has not yet been processed or analyzed by BLM.

Rationale for Resource Analysis—Temporal Overlap with Resolution Copper Project

The timing of this project is currently unknown.

Rationale for Resource Analysis—Spatial Overlap with Resolution Copper Project

This RFFA would be approximately 15 miles southwest of project areas shared by all action alternatives (2–6) and falls within the spatial rationale for at least some resources presented within chapter 4 of the FEIS (Table 4.3-1, Cumulative effects spatial analysis areas for cumulative effects, and preferred and proxy impact metrics).

Rationale for Analysis as Cumulative Effect in EIS

This potential RFFA lacks sufficient detail to analyze and was not carried forward for further analysis in the cumulative effects section of the FEIS.

Literature Cited

Copper Fox Metals Inc. 2024. Projects. Mineral Mountain. Available at:

<https://copperfoxmetals.com/projects/mineral-mountain/overview/>. Accessed October 21, 2024.

ASARCO Hayden Smelter Restart

Overview of RFFA

The ASARCO operations, including the Hayden smelter, are currently analyzed in chapter 4 of the FEIS as RFFAs requiring cumulative effects analysis. The project is located southeast of the proposed Resolution Copper Project. In May 2024, a media report indicated that Grupo Mexico, owner of ASARCO, was considering restarting the closed Hayden smelter. The information was attributed to two unidentified sources within the company.

In August 2024 in an interview, Óscar González Rocha, President and CEO of ASARCO, stated, “The Hayden concentrator and the smelter in Arizona will remain inactive while we assess the situation to determine how to resume operations.” No further details or information were found regarding a potential restart.

Rationale for Resource Analysis—Temporal Overlap with Resolution Copper Project

The timing of this project is currently unknown.

Rationale for Resource Analysis—Spatial Overlap with Resolution Copper Project

This RFFA would be approximately 25 miles southeast of project areas shared by all action alternatives (2–6) and falls within the spatial rationale for at least some resources presented within chapter 4 of the FEIS (Table 4.3-1, Cumulative effects spatial analysis areas for cumulative effects, and preferred and proxy impact metrics).

Rationale for Analysis as Cumulative Effect in EIS

This potential RFFA lacks sufficient detail to analyze and was not carried forward for further analysis in the cumulative effects section of the FEIS.

Literature Cited

Global Business Reports. 2024. Interview with Óscar González Rocha, President and CEO, Asarco. Available at: https://www.gbreports.com/interview/oscar-gonzalez-rocha_5. Accessed October 18, 2024.

Minerals Withdrawal of Town of Superior Exchange Lands

Overview of RFFA

As described in Section 1.4.2.2 of the FEIS:

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, the Federal reversionary interest would be removed, after which time the parcel could be used for non-airport purposes. Since the land transfer had not been requested at the time of the FEIS, the Town of Superior land exchange is not considered to be a connected action or a reasonably foreseeable future action.

On October 15, 2021, the Town submitted a request to the Secretary of Agriculture to convey the subject lands to the Town. On July 17, 2024, the BLM issued Public Land Order No. 7943; Withdrawal of National Forest System Lands, Tonto National Forest, Superior, Arizona (BLM 2024). The public land order withdraws the exchange lands from mineral entry for a period of 20 years.

Previous screening for status of the Town of Superior exchange indicated that since the request had not been made for the transfer, they were not yet reasonably foreseeable (Newell et al. 2020). This status has now changed, and it is appropriate to move this RFFA forward into the cumulative effects analysis.

Rationale for Resource Analysis—Temporal Overlap with Resolution Copper Project

The timing for completion of the land exchange is currently unknown, but as it has been initiated and the land withdrawn, completion is anticipated to happen before or concurrently with Resolution Copper Project operations.

Rationale for Resource Analysis—Spatial Overlap with Resolution Copper Project

This RFFA would be within approximately 2 miles of project areas shared by all action alternatives (2–6) and falls within the spatial rationale for at least some resources presented within chapter 4 of the FEIS (Table 4.3-1, Cumulative effects spatial analysis areas for cumulative effects, and preferred and proxy impact metrics).

Rationale for Analysis as Cumulative Effect in EIS, by Resource

Resource Category Results of RFFA Screening

Resource Category	Results of RFFA Screening
Geology, Minerals, and Subsidence	Dismiss from further analysis; RFFA would not contribute to cumulative effects or effects are negligible. While the area has been withdrawn for mineral entry, the exchange lands are still subject to all valid existing rights, and any mineral resources with sufficient evidence would remain accessible.
Soils, Vegetation, and Reclamation	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects to soils and vegetation resources, specific development plans are not yet known for these parcels.
Noise and Vibration	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to noise and vibration, specific development plans are not yet known for these parcels.
Transportation and Access	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to traffic or access, specific development plans are not yet known for these parcels.
Air Quality	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to air quality, specific development plans are not yet known for these parcels.
Water: Groundwater Quantity and Groundwater-Dependent Ecosystems	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to groundwater use and groundwater resources, specific development plans are not yet known for these parcels.
Water: Groundwater and Surface Water Quality	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to groundwater or surface water quality, specific development plans are not yet known for these parcels.
Water: Surface Water Quantity	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to flood and drainage patterns, specific development plans are not yet known for these parcels.
Wildlife	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to wildlife habitat or individuals, specific development plans are not yet known for these parcels.
Recreation	Dismiss from further analysis; RFFA would not contribute to cumulative effects or effects are negligible. No known recreation resources are located on these exchange lands.
Public Health and Safety: Tailings Safety	Dismiss from further analysis; RFFA would not contribute to cumulative effects or effects are negligible. There are no tailings involved in this proposed development.

Resource Category	Results of RFFA Screening
Public Health and Safety: Fuels and Fire Management	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to fuel loads and fire risk, specific development plans are not yet known for these parcels.
Public Health and Safety: Hazardous Materials	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to use, storage, or transportation of hazardous materials, specific development plans are not yet known for these parcels.
Scenic Resources	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to visual or scenic resources, specific development plans are not yet known for these parcels.
Cultural Resources	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to cultural resources, specific development plans are not yet known for these parcels, nor is the potential treatment of cultural resources known at this time.
Socioeconomics	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to socioeconomic resources, from commercial, industrial, or residential development, specific development plans are not yet known for these parcels.
Tribal Values and Concerns	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to Tribal values or concerns, specific development plans are not yet known for these parcels.
Environmental Justice	Dismiss from further analysis; insufficient information exists to analyze. While future development of the Town of Superior exchange lands could potentially contribute to cumulative effects with respect to environmental justice, and environmental justice communities are present, specific development plans are not yet known for these parcels.
Livestock and Grazing	Dismiss from further analysis; RFFA would not contribute to cumulative effects or effects are negligible. No known grazing occurs on these exchange lands.

Literature Cited

Bureau of Land Management (BLM). 2024. Public Land Order No. 7943; Withdrawal of National Forest System Lands, Tonto National Forest, Superior, Arizona. Federal Register 89(137).

Newell, E., K. Perry, and D. Morey. 2020. *Post-DEIS Update: Determination of Reasonably Foreseeable Actions Considered in Cumulative Effects Analysis*. Process memorandum to file. Phoenix, Arizona: SWCA Environmental Consultants. October 28.