



File Code: 1950  
Date: March 8, 2018

Ms. Vicky Peacey  
Senior Manager, Environment and External Affairs  
Resolution Copper Mining, LLC  
102 Magma Heights  
Superior, AZ 85173

RE: Alternatives Memo #5 – Request for Concurrence on Revisions to Proposed Action and Range of Alternatives

Dear Ms. Peacey:

On February 2, 2018, in response to a project data request (Alternatives Data Request #4 dated 12/5/2017), Resolution Copper provided their review of the proposed alternatives developed by the Forest Service for the Resolution Copper Project and Land Exchange EIS. In response to Alternative 2 – Proposed Action, the following was noted:

“The advance of the Near West tailings facility design and trends in tailings stewardship since the MPO study has led to a re-evaluation of the embankment design criteria and the MPO upstream raised design...During an embankment alternatives assessment in 2016/2017 (KCB 2017a), it was found that an uncompacted upstream-raised tailings embankment does not meet the updated design criteria and, therefore, should not be considered as a viable alternative.” (KCB 2018<sup>1</sup>, page 2)

At the same time, Resolution provided two additional modified versions of the proposed action to the Forest Service for consideration:

- The first modified version of the proposed action was titled “Alternative 3A”<sup>2</sup>. This alternative considers a tailings facility in the same location as the proposed action, but using a modified centerline tailings embankment composed of an earth fill starter dam and cyclone NPAG tailings. PAG deposition occurs as originally proposed in the GPO.
- The second modified version of the proposed action was titled “Alternative 3B”<sup>3</sup>. This is a modification of an alternative proposed by the Tonto and includes using a modified centerline tailings embankment composed of an earth fill starter dam and cyclone NPAG

<sup>1</sup>KCB, 2018. “Resolution Project, Tailings Alternatives for the Draft Environmental Impact Statement”, Correspondence with Vicky Peacey, Resolution Copper, January 26, 2018.

<sup>2</sup> KCB, 2018. “Resolution Project, Alternative Portfolio for Analysis, Alternative 3A – Near West Modified Proposed Action (Modified Centerline Embankment)”, Correspondence with Vicky Peacey, Resolution Copper, January 26, 2018.

<sup>3</sup> KCB provided modifications directly to a document originally provided by the Tonto, “Process Memorandum to File – Alternative Portfolio for Analysis – Alternative 3B Modified Proposed Action”, January 26, 2018.



tailings. PAG deposition occurs in a separate low-permeability cell, and additional thickening would be used on the NPAG tailings.

The NEPA project team recognizes that both Alternatives 3A and 3B represent design modifications to the proposed action tailings storage facility as described in the GPO. The NEPA project team also recognizes that these modifications were made directly in response to resource issues raised during scoping, and that these modifications resolve certain resource conflicts (particularly with public health and safety). Alternative 3A generally represents a modified approach as proposed by Resolution Copper, and Alternative 3B generally represents a modified approach as proposed by the NEPA project team. Given these improvements, and concerns over the original GPO dam design, the NEPA project team proposes to modify the range of alternatives to be considered in detail in the Draft EIS in the following manner:

- The tailings storage facility proposed in the GPO will not be analyzed in detail. Instead, this alternative will be replaced with the tailings storage facility described by Resolution Copper as “Alternative 3A”. This will be referred to in the Draft EIS as “Alternative 2 – Modified Proposed Action”
- The tailings storage facility described by Resolution Copper as “Alternative 3B” will be analyzed in the Draft EIS as “Alternative 3 – Modified Proposed Action with PAG Cell”.

The remaining alternatives analyzed in detail in the Draft EIS will be:

- Alternative 4 – Silver King Filtered
- Alternative 5 – Peg Leg Lined
- Alternative 6 – Peg Leg Unlined

I request that you consider the above changes and provide written concurrence that the tailings storage facility as described in the GPO is no longer appropriate to analyze in detail, and that replacement with the modified centerline alternative identified by Resolution Copper as “Alternative 3A” is therefore warranted.

As the responsible official, it's within my authority to modify the proposed action and alternative(s) under consideration prior to issuing a draft EIS (36 CFR 220.5(e)(1)). I may also consider the incremental changes as alternatives considered. Documentation of these incremental changes to a proposed action or alternatives will be included or incorporated by reference in accord with 40 CFR 1502.21.

I look forward to your concurrence on this topic. Please don't hesitate to contact me, or project manager Mary Rasmussen (cell: 480-710-7304 or email: mcrasmussen@fs.fed.us) if there's a need to discuss this further.

Sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

**NEIL BOSWORTH**  
Forest Supervisor