

Supervisor Jason Whiting,
Chair, Navajo County

Supervisor Richard Lunt,
Vice Chair, Greenlee County

Supervisor Steve Christensen,
Director, Gila County



Supervisor Paul David,
Director, Graham County

Supervisor Nelson Davis,
Director, Apache County

Supervisor Peggy Judd,
Director, Cochise County

Pascal Berlioux, Ph.D. MBA, Executive Director

February 22, 2021

Reid Nelson
Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Delivered Via Email: rnelson@achp.gov

Subject: Support for the Resolution Copper Programmatic Agreement

Dear Mr. Nelson:

The Eastern Arizona Counties Organization includes Gila County, Navajo County, Greenlee County, Graham County, Navajo County, Apache County, and Cochise County. Our primary mission is to plan and implement specific environmental programs impacting economic development in the Counties we serve. Such programs include forest restoration, watershed restoration, energy, water, recreation, threatened and endangered species, infrastructures, public lands and natural resources planning.

The Resolution Copper Project and associated Environmental Impact Statement are issues of significant interest to our organization, especially those member counties who will see direct benefit from the project. Copper mining is part of the fabric Arizona's history and this project will continue that tradition through its operations and through several cultural preservation measures outlined in the Programmatic Agreement.

Those measures are meaningful to many stakeholders, including local communities across the copper Triangle and Native American Tribes who participated extensively in consultation on the EIS and Section 106 progress that was coordinated by the United States Forest Service. The data recovery measures for historic properties associated with mining will further our knowledge of the history of the Copper Triangle region and specifically the Pioneer Mining District. Tribal communities will be participating in the data recovery through the tribal monitor program, providing jobs and job training as well as information and knowledge. For beneficiary communities, these measures and the economic benefits Resolution Copper can deliver will ensure our mining communities continue to prosper and live on while balancing historic preservation through the measures outlined in the Programmatic Agreement.

The recent action of ACHP related to the Resolution Copper Programmatic agreement is of significant concern from our perspective as it calls into question the integrity of the Advisory Council taking a political position at the very end of a process they have participated in for years. The USFS coordinated a thorough and rigorous NEPA process run in parallel with the Section 106 process which has spanned more than seven years and three administrations. The Programmatic Agreement was included in the Draft EIS for public comment and underwent almost a dozen versions, incorporating stakeholder feedback all along the way, including feedback from the Advisory Council.

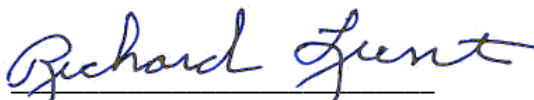
We are keenly aware of the delicate balance required when considering public lands and natural resource planning. The established process of developing programmatic agreements is critical to addressing concerns of rural communities most directly impacted by projects as it provides a voice to those communities. Furthermore, this dangerous precedent could have far reaching consequences to economic development opportunities in rural Arizona and also the much-needed infrastructure improvements needed across our country associated with any and all federal decisions. It is for these reasons that adherence to the processes described in Programmatic Agreement and finalization of that document are critical and we support that direction.

Therefore, we ask that ACHP reconsider its position on the Resolution Copper Programmatic Agreement in alignment with your organization's previous statements that USFS has completed consultation in line with Section 106 and the agreement should be implemented as drafted.

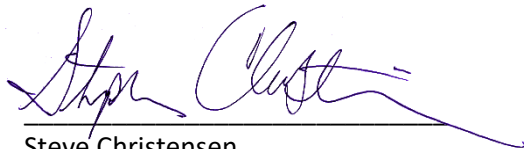
Sincerely,



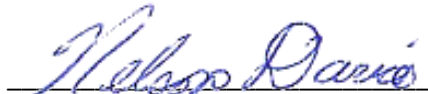
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Eastern Arizona Counties Organization Chair
Navajo County Supervisor



Richard Lunt
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Greenlee County Supervisor



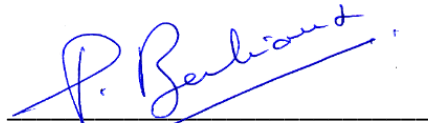
Steve Christensen
Eastern Arizona Counties Organization past Chair
Gila County Supervisor



Nelson Davis
Eastern Arizona Counties Organization Director
Apache County Supervisor



Peggy Judd
Eastern Arizona Counties Organization Director
Cochise County Supervisor



Pascal Berlioux, PhD, MBA
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