

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

Dear Mr. Nelson:

I have been a part of the meetings with Resolution Copper in this journey since 2003 or 2004. This is mining and ranching country and is our roots. I am a resident of Superior, a member of the Superior Chamber of Commerce, a member of Rebuild Superior Inc, and a member of the Community Working Group and have been working to look at practices and mitigation efforts and comment on the EIS regarding Resolution Copper to have a transparent and balanced reopening of the mine that will be instrumental to help our region's economy. The USFS has conducted an open, transparent, and complete process giving all of us a voice in the process. I support Resolution Copper and the mitigations put in place so that EIS can go through.

The development of the Resolution Copper Programmatic Agreement has not been rushed and ACHP has been involved in its development for several years. The USFS coordinated the NEPA process with Section 106 of the National Historic process and provided multiple opportunities for all public and group comment for all phases and over many years. I participated in the process in good faith however one group though invited chose not to participate, (However there were members of the tribe that did participate on their own.), in this process proscribed by the NEPA process and yet the ACHP only is listening to that group

now not all of us. I request and support the mitigation measures in the PA and the PA and Final EIS should be supported.

It contains provisions that are vital to the historic preservation, cultural integrity, and economic prosperity for everyone in this region:

- * Establishment of a Community Development Fund specifically at addressing effects from the project on historic properties and other community infrastructures for everyone in the Copper Triangle.

- * Development of a new Castleberry Campground as mitigation for the Oak Flats, to include cultural resources interpretive information. Development of the Trail system worked on by the RUG group and FS.

- * The agreement has been widely vetted with all the affected residents and interests in this area.

- * Also has provisions for the Tribe: The Emory Oak Collaborative Tribal Restoration Initiative, Foundation for Tribal Program Funding, Tribal Cultural Fund, Tribal Education Fund, Archeological Database Funds.

The ACHP actions to terminate the PA at the last minute, after years of participation and after all Federal and State agencies have signed is unprecedented. The ACHP actions tell me that my and other's years of involvement in the work, participation and requested mitigation measures are worthless. The ACHP ignored all the work, ignored all our input and I/we do not understand why the ACHP walked away from this effort that we all spent years developing. What do these actions tell me and the country about how this process works. Did we waste our time and should have taken a political approach instead? We used the process as we believe we should have.

This is so important to this region, the potential for jobs, the mitigations worked out for all towns and groups are needed and will be beneficial to the whole. Hopefully you will reconsider and think about all of us who followed the prescribed process and contributed to this work and find a way to move this forward and make it happen for all.

Sincerely,

Pamela Dalton-Rabago, Resident

CC:

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