



# TOWN OF SUPERIOR

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February 23, 2021

Mr. Christopher Daniel  
Advisory Council on Historic Preservation  
401 F Street, NW, Suite 308  
Washington, DC 20001-2637  
resolutioncopper@achp.gov; rnelson@achp.gov

Re: ACHP Programmatic Agreement

Dear Mr. Daniel,

As you know, the Town of Superior has been working with Resolution Copper Mining to address the multiple impacts of its proposed mining operations on our community. These impacts include cultural heritage, socioeconomic, water, and environmental justice, and were analyzed through an extensive public engagement process and numerous technical studies. The Town, as well as many other agencies, has engaged in thousands of hours of meetings and negotiations in order to produce agreements to mitigate these impacts. In short, the NEPA process has done its job.

Now, as we are nearing the end of this difficult process, the White House Advisory Council on Historic Preservation's decision not to take action on the programmatic agreement has placed the Record of Decision memorializing these mitigations in jeopardy. We feel this action is misguided for the following reasons:

1. This will not block the transfer of the Land Exchange properties. The legislation is tied to the Final Environmental Impact Statement and will transfer with or without the ROD on March 15<sup>th</sup> of 2021. The legislation does not require the programmatic agreement to proceed with the exchange.
2. This will remove all of the environmental, socioeconomic, water and cultural mitigations from the table, but will not stop them from mining. As Oak Flat will now be private property, the next permitting cycle will be much less expansive, including only an EA for the proposed pipeline. An EIS or a 404 would no longer be required. All of the mitigations for the larger permit could be removed from discussion. This would be a disaster for the affected communities, the environment, and even the tribes.

Mr. Daniel, we are very appreciative of your consideration of the many impacts of the Resolution Copper Mine project. We look forward to continuing this productive dialogue with you and your staff.

Please contact our Town Manager, Todd Pryor at 520-689-5752 or [manager@superioraz.gov](mailto:manager@superioraz.gov), if you have questions or would like additional information.

Thank you for your attention to these matters of critical importance to the Town of Superior.

Sincerely,

A handwritten signature in cursive script that reads "Mila Besich".

Mila Besich  
Mayor  
Town of Superior

cc: Arizona Congressional Delegation, [Robert.bonnie@usda.gov](mailto:Robert.bonnie@usda.gov); [chris.french@usda.gov](mailto:chris.french@usda.gov); [victoria.christiansen@usda.gov](mailto:victoria.christiansen@usda.gov); [neil.bosworth@usda.gov](mailto:neil.bosworth@usda.gov); [tom.torres@usda.gov](mailto:tom.torres@usda.gov);