

**BOYCE THOMPSON
ARBORETUM**

August 4, 2025

Ms. Ericka Luna, Supervisor
Tonto National Forest
2324 E. McDowell Rd.
Phoenix, Arizona 85006

RE: Comments on the FEIS

Dear Supervisor Luna,

The Boyce Thompson Arboretum has completed its review of the Final Environmental Impact Statement (FEIS). The FEIS is a very thorough and complete document and the effort that has been put into this is evident. Thank you for such careful and scientific review of all the complex issues that revolve around this project. This is a significant milestone for our community, Resolution Copper, our state, and region. As a key stakeholder, the Arboretum would like to comment on one key area where we feel the document can be improved or clarified.

The Boyce Thompson Arboretum currently has 5 wells that are dependent on surface ground water and the recharge of the aquifer that our wells access. The lack of water in Queen Creek in the past 100 years has led to the depletion of our aquifer and the inability to recharge. The fissure in Queen Creek caused by the Magma Mine have contributed to the lack of flow in Queen Creek and thus starving our aquifer. In addition, the current mega drought and lack of rainfall has made these conditions worse. Many of our wells are at the 300' depth and may be subject to the dewatering effects from the Resolution Copper Mine. On October 13, 2019, in response to the draft FEIS, the Town of Superior identified the following mitigation strategy:

- An alternative water supply should be provided for the Boyce Thompson Arboretum to avoid interruption of the water supply to the gardens due to decreased groundwater availability.

This mitigation strategy was not addressed in the current FEIS. The Boyce Thompson Arboretum is situated at the base of Picket Post Mountain and adjacent to the Tonto National Forest. The Arboretum is located approximately 40 minutes from Mesa and one hour from downtown Phoenix. The Arboretum welcomes over 145,000 visitors annually. At 372 acres, it is Arizona's oldest and largest botanical garden with deep roots in Arizona's history. This attraction is vital to the economy of Superior and the second largest employer in the community. The 145,000 visitors are part of the local economy and visit downtown Superior for its restaurants and shops. It is the primary tourism driver for the region.

Although the FEIS identifies risks to the Arboretum's ground water supply as worst-case scenario. If, however, this were to occur there are no alternatives or redundant systems in place to sustain the Arboretum's water supply. We respectfully request that a mitigation strategy be added to the FEIS to add a secondary water supply to the Arboretum to ensure its long-term survival.

Thank you in advance for your consideration of the potential impacts to the Boyce Thompson Arboretum from the Resolution Copper project. I look forward to future collaboration and discussion with you and your staff regarding this matter. Please contact the Arboretum's Executive Director, Kim Gray, at 608-434-0582 or kim.gray@btarboretum.org if you have any questions or would like any additional information.

Sincerely,


Kim Gray
Executive Director
Boyce Thompson Arboretum