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Organization:

Title:

Comments: Objection to the Resolution Copper Project and Land Exchange

Project #: 48956

Objector Name: Kim Fraczek, Director, Sane Energy Project

Responsible Official: Ericka Luna, Deputy Forest Supervisor

National Forest: Tonto National Forest

Dear Ericka Luna, Deputy Forest Supervisor

I am writing to object to the Resolution Copper Project and Land Exchange as currently proposed in the Final Environmental Impact Statement (FEIS) and Draft Record of Decision (ROD).

I submitted timely comments during the public comment period and am deeply concerned that this project, particularly the plan amendment allowing construction of ancillary infrastructure (roads, powerlines, and pipelines) on National Forest System land, disregards environmental, cultural, and public interest protections in favor of private, extractive industry interests.

Objection Points:

1. Irreversible Damage to Oak Flat and Tribal Sovereignty

The Resolution Copper Project would result in the destruction of Oak Flat (Chi'chil Bildagoteel), a sacred site for the San Carlos Apache and other Indigenous peoples. This violates federal trust responsibilities and undermines the religious freedoms and cultural heritage protections of tribal communities. The land exchange enabling this destruction was executed through a midnight rider attached to the 2015 NDAA, circumventing public and tribal consultation processes.

2. Violation of NEPA and the Forest Plan

The project-specific forest plan amendment effectively rewrites protections for this landscape to accommodate the project's infrastructure. This sets a dangerous precedent for weakening Forest Service planning rules in favor of industrial projects. The FEIS fails to adequately assess cumulative impacts to hydrology, biodiversity, and climate, and lacks a credible mitigation or reclamation plan for the massive subsidence crater that would be left behind.

3. Water Impacts in a Water-Scarce Region

The project will use an estimated 250 billion gallons of water over its lifetime—an unacceptable draw in an increasingly water-scarce Southwest, with no clear plan for how Resolution Copper will secure these resources without devastating local water tables, ecosystems, and communities.

4. Lack of a Meaningful Alternative

The FEIS does not consider any alternatives that avoid the destruction of Oak Flat or protect tribal cultural resources, violating the National Environmental Policy Act (NEPA) mandate to rigorously explore and objectively evaluate all reasonable alternatives.

* Requested Remedies:

1. Deny the project-specific Forest Plan amendment that exempts this project from core protections and policies.

2. Reject the infrastructure approvals on National Forest lands, as these directly facilitate the irreversible destruction of a sacred landscape.

3. Initiate a new environmental review that includes meaningful tribal consultation and alternatives that avoid destruction of Oak Flat.

4. Withdraw or suspend the land exchange until free, prior, and informed consent is obtained from affected Tribal Nations.

Respectfully submitted,

Kim Fraczek, Director, Sane Energy Project