



MEMORANDUM

Date: March 12, 2026

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: Jan Leshner 
County Administrator

Re: **State Land Auction for Proposed Copper World Mine**

Attached are two letters I sent this week regarding the State Land auction for the proposed Copper World Mine. The first letter addressed to Governor Hobbs states that we do not share her position that the mine is inevitable and auction of this land will buffer nearby homes and the school. The second letter addressed to State Land Commissioner Sahid reiterates Pima County's opposition to the proposed auction of state land.

JKL/dym

Attachments

c: Carmine DeBonis, Jr., Deputy County Administrator
Steve Holmes, Deputy County Administrator
Chad Kasmir, Deputy County Administrator
Scott DiBiase, Director, Department of Environmental Quality
Kris Gade, Director, Conservation Lands and Resources
Chris Poirier, Director, Development Services
Eric Shepp, Director, Regional Flood Control District
Nicole Fyffe, Senior Advisor, County Administrator's Office
Michael Racy, Racy Associates, Inc.

ATTACHMENT 1



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
115 N. CHURCH AVE., 2nd FLOOR, Suite 231, TUCSON, AZ 85701-1317
520-724-8661, FAX 520-724-8171

JAN LESHER
County Administrator

March 9, 2026

The Honorable Katie Hobbs
Governor, State of Arizona
1700 W. Washington Street
Phoenix, AZ 85007

Re: **State Land Auction for the Proposed Copper World Mine**

Dear Governor Hobbs:

It is my understanding that the 160-acre State land auction for the proposed Copper World mine will not stop or be deferred. An article in the Arizona Daily Star suggests that there is a belief the mine will proceed regardless, and that allowing the auction to proceed will result in buffering homes and schools from the tailings. Pima County does not share this position based on the following:

1. This proposed mining project has not yet been "sanctioned" by Hudbay's Board and their new partner Mitsubishi, a decision that is required per Canadian security regulations and can only be made after review of a feasibility study, which has also not yet been completed. The sanctioning decision is the deciding factor regarding whether or not the mine will proceed to construction.
2. The auction of this 160-acre parcel of State Trust land is key to the feasibility of this mine as it provides Hudbay potential access to 480 acres of private land to the north. If they successfully access those 480 acres, the school and homes would be closer to the tailings than any small buffer that Hudbay is saying the 160-acre parcel would provide without any assurances.

Pima County is aware of the significant history of copper mining in Pima County. We understand the importance of copper production and support responsible copper mining in appropriate locations. Pima County has collaborative relationships with two large mines west of Green Valley and has supported their expansion. Unlike the Santa Rita Mountains and its foothills, these other areas hold significant reserves for continued copper production and are much less significant from an ecological perspective.

The Honorable Katie Hobbs

Re: **State Land Auction for the Proposed Copper World Mine**

March 9, 2026

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Pima County has also previously supported the reopening of an underground copper mine in the mountains north of Tucson based on a willingness by the mine owners to meaningfully mitigate impacts to Pima County's Conservation Lands System.

It remains Pima County's position that proceeding with this land auction could facilitate a foreign mining company impacting our community by destroying irreplaceable natural and cultural areas, draining an aquifer that is already experiencing declining water levels and subsidence, and degrading the quality of our air and water.

The mines already operating in Pima County have sufficient reserves to continue expanding copper production in areas more appropriate for mining. I again respectfully request consideration of delaying the land auction until the final feasibility study is completed.

Sincerely,



Jan Lesher

Pima County Administrator

Attachment – February 6, 2026, letter requesting deferral of the 160-acre State land auction.

c: Robyn Sahid, Arizona State Land Commissioner
Carmine DeBonis Jr., Deputy County Administrator
Steve Holmes, Deputy County Administrator
Chad Kasmar, Deputy County Administrator
Scott DiBiase, Director, Department of Environmental Quality
Kris Gade, Director, Conservation Lands and Resources
Eric Shepp, Director, Regional Flood Control District
Nicole Fyffe, Senior Advisor, County Administrator's Office
Michael Racy, Racy Associates, Inc.



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JAN LESHER
County Administrator

February 6, 2026

The Honorable Katie Hobbs
Governor, State of Arizona
1700 W. Washington Street
Phoenix, AZ 85007

Re: **Application No. 53-122457-00-100 Copper World, Inc**

Dear Governor Hobbs:

Pima County continues to oppose development of the proposed Copper World mining project south of Tucson, including the sale of 160 acres of State Trust land for mine tailings. Today, State Land Commissioner Robyn Sahid notified us that the sale is moving forward with the auction scheduled for April 29th and the required public notices to be published next week. Hubday has not yet completed the final feasibility study for Copper World.

I respectfully request that the public notices be rescinded and the auction of the 160 acres of State Trust land be deferred until the final feasibility study is completed and reviewed.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan Leshner", written in a cursive style.

Jan Leshner
Pima County Administrator

JKL/anc

c: Robyn Sahid, Arizona State Land Commissioner
Carmine DeBonis Jr., Deputy County Administrator
Steve Holmes, Deputy County Administrator
Kris Gade, Director, Conservation Lands and Resources
Eric Shepp, Director, Regional Flood Control District
Nicole Fyffe, Senior Advisor, County Administrator's Office
Michael Racy, Racy Associates, Inc.

ATTACHMENT 2



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
115 N. CHURCH AVE., 2nd FLOOR, Suite 231, TUCSON, AZ 85701-1317
520-724-8661, FAX 520-724-8171

JAN LESHER
County Administrator

March 12, 2026

Robyn Sahid, Commissioner
Arizona State Land Department
1110 W. Washington St.
Phoenix, AZ 85007

Re: Support for Protest of Public Auction Sale No. 53-122457 for Copper World

Dear Commissioner Sahid:

Pima County supports the attached protest of Public Auction Sale No. 53-122457 submitted by a firm representing Save the Scenic Santa Rita's. Regarding the specific terms of the auction that are appealable, Pima County is similarly concerned that minimum bid price may be based on an undervalued appraisal. Pima County has applied for and purchased many parcels of State Trust land. Those appraisals often included hypothetical conditions and extraordinary circumstances that disregarded impediments to development and existing local land use or zoning designations, resulting in an inflated appraised value of the land. This was not the case for this 160-acre property which was appraised based on the zoning code classification of Rural Homestead even though the appraisal acknowledges that the parcel will not be used for Rural Homestead uses and that the proposed use is industrial.

Pima County is also concerned about the lack of consideration for the monetary impacts to the value of adjacent State Trust land due to the groundwater pumping that would be necessary to serve the mine in an area with large State Trust land holdings. The lack of a required 5-year State Trust land disposition plan is a concern of Pima County's for a while as more urban lands that may be ripe for development are not moving to auction even though our region is facing a housing shortage and has identified the availability of land for housing as a contributing constraint.

Again, we request this property be withdrawn from auction.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan Leshner", is written over a horizontal line.

Jan Leshner
Pima County Administrator

Robyn Sahid, Commissioner

Re: **Support for Protest of Public Auction Sale No. 53-122457 for Copper World**

March 12, 2026

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Attachment

c: The Honorable Katie Hobbs, Arizona Governor
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March 6, 2026

Commissioner Robin Sahid
Arizona State Land Department
1110 W. Washington Street
Phoenix AZ 85007

re: Protest pursuant to A.R.S. § 37-301 of Public Auction Sale No. 53-122457

Dear Commissioner Sahid,

This firm represents Save the Scenic Santa Ritas Association (“SSSR”).

On Friday, February 13, 2026, the Arizona State Land Department (“ASLD”) published on its website a notice of Public Auction Sale No. 53-122457 (“Notice”).

According to the Notice, ASLD is scheduled to sell 160.08 acres of State Trust Land located in the northwestern Santa Rita Mountains in Pima County, Arizona (APN 305-53-0160), fully described in the Notice (“Sale Parcel”). A map showing the Sale Parcel is attached as **Exhibit A**.

The Notice states that the Sale Parcel has been appraised at \$993,000.00, and will be sold by public auction on Wednesday, April 29, 2026 at 11:00 a.m. to the “highest and best bidder” (“Auction”).

SSSR hereby submits a protest pursuant to A.R.S. § 37-301 opposing the Auction. The sale by public auction of the Sale Parcel is a violation of ASLD’s obligations under the Enabling Act, Arizona’s Constitution and A.R.S. § 37-101 *et seq.* Not only is the appraisal invalid but ASLD has failed to comply with its mandatory obligations to develop a disposition plan pursuant to A.R.S. § 37-331.03.

a. Copper World wants the Sale Parcel for its copper mine tailings storage facility

On or about July 30, 2021, Rosemont Copper Company (Copper World’s predecessor) filed with ASLD an Application to Purchase the Sale Parcel (No. 53-122457).

Copper World plans to use the Sale Parcel for a mine tailings storage facility to support its massive open-pit copper mine complex that would cover at least 4,500 acres

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of the Santa Rita Mountains. Copper World claims this mine will be “one of the largest producers of copper in the United States.” See www.copperworldaz.com.

On or about August 28, 2025, ASLD obtained an appraisal for the Sale Parcel opining that the property has a market value of \$993,000.00 (“Appraisal”).

On or about September 10, 2025, SSSR submitted objections to the appraisal of the Sale Parcel to ASLD and the Arizona State Land Department Board of Appeals (“Board”)

On or about September 11, 2025, the Board approved the sale of the Sale Parcel to Copper World.

On February 13, 2026, ASLD’s website gave notice that the Sale Parcel will be sold at auction on April 29, 2026.

b. The Auction is invalid because ASLD is in violation of A.R.S. § 37-331.03

As part of its responsibility to administer State Trust Land in the Trust’s best interest, the Department is required to develop long-range plans for the future use of State Trust Land, including 5-year disposition plans for all State Trust Land projected to be sold, leased, or otherwise disposed of in a 5-year period. A.R.S. §§ 37-331.03, 37-132(A)(3).

ASLD is in violation of A.R.S. § 37-331.03 because ASLD has “**failed to develop statutorily required 5-year disposition plans, risking difficulties demonstrating State trust land sales were transparent and in trust beneficiaries’ interest.**” See July 2025 Report submitted by the Arizona Auditor General, Lindsey A. Perry, CPA, CFE, (“Auditor General”) entitled *A Performance Audit and Sunset Review of the Arizona State Land Department*, Report 25-103 (“Report”), at 10 (all emphasis added unless otherwise noted).

The Auditor General effectively concluded that the deficiencies in ASLD’s compliance with its statutory obligations negatively affects ASLD’s ability to generate revenue for trust beneficiaries.

The Auditor General concluded that the legislation that established the Department’s statutory requirement to develop disposition plans (A.R.S. §§ 37-331.03), which the Department has failed to comply with, was intended to provide Department land use planning reforms **to further the best interests of the State’s citizens, protect natural heritage, and wisely manage the growth of the State’s communities.** See Laws 1998, Ch. 204, §1; Report at 14.

The Auditor General concluded that, “[b]y not creating long-range disposition plans for State trust land and instead making State trust land disposition decisions on a case-by-case basis, the Department increases the risk that it will have **difficulty**

demonstrating that its decisions to sell State trust land **were the highest and best use of the land and in the interest of the trust beneficiaries.**” Report at 13.

The Auditor General’s conclusion is based on recommended practices from the *Lincoln Institute of Land Policy* (in particular, [Culp, P.W., et.al. \(2015\). *State Trust Lands in the West: Fiduciary duty in a changing landscape.*](#)), which demonstrate that managers of State Trust Land **can produce larger, more reliable revenues** for trust beneficiaries and **improve decision making** by using land disposition plans and large-scale planning processes. Report at 13.

The Auditor General also concluded that, by not developing a disposition plan, ASLD **“lacks the transparency** to demonstrate that its decisions to bring State Trust Land to auction are **consistent with long-range goals** for the land and are **in the best interest of the trust beneficiaries.**” Report at 13. “[D]isposition plans **decrease the risk that projects are driven by external stakeholders** or that dispositions will not be **timed to yield the highest possible returns.**” *Id.*

Absent proactive planning for the disposition of State Trust Land, ASLD “increases the risk that it will have difficulty demonstrating that its decisions to sell State trust land are **in the interest of the trust beneficiaries** and **not only in the interest of external stakeholders**, such as when a developer or other external party is **the only bidder for the land.**” *Id.* 13-14. The Auditor General concluded that a **sale with only one bidder is not in the best interest of trust beneficiaries.** “On average, auctions with more than 1 bidder had winning bids approximately **68% higher** than the land’s appraised value, and auctions with 1 bidder, on average, only had winning bids approximately 0.04% higher than the land’s appraised value.” Report at 13-14, Appendix B, pages b-1 to b-10.

The Auditor General also concluded that the Department’s lack of disposition plans for State Trust Land **increases the risk of disorderly growth and development** on State Trust Land. The Report found that this is **contrary to ASLD’s statutory responsibilities under A.R.S. §37-132(A)(4)** to promote the infill and orderly development of State Trust Land in areas beneficial to the trust and prevent urban sprawl or leapfrog development on State Trust Land. Agency driven actions that are “reasonably transparent can provide local communities and other stakeholders **with better information to make decisions, leading to better planning for growth and development.**”

Here, ASLD is set to sell the Sale Parcel at the Auction on an ad hoc basis, at the urging of an external stakeholder, Copper World. The sale of the land is not motivated by or consistent with long-range goals for the land or the best interests of the trust beneficiaries. Because there is no disposition plan (and has not been one since ASLD’s 2011 disposition plan expired in 2016), there are **no long-range goals for the land** or any determination of what would be in the best interest of trust beneficiaries. ASLD is driven **only by Copper World’s interests**, by Copper World’s needs, by Copper World’s timing, and by Copper World’s advantage in paying the minimum amount set

out in an appraisal. Copper World will (almost certainly) be the **only bidder** at the Auction, and thus the Sale Parcel will sell to Copper World **at its lowest price**, namely, the appraised value.

Moreover, because there is no “proactive planning” prior to the Auction, i.e., no disposition plan in place since 2016, as required by A.R.S. § 37-331.03, ASLD cannot demonstrate that its decision to sell the Sale Parcel to Copper World is in the best interest of the trust beneficiaries and not only in the best interest of Copper World. ASLD cannot demonstrate that this sale would be the highest and best use of the land. This sale would lack the transparency to demonstrate that ASLD’s decision to sell the Sale Parcel to Copper World is consistent with long-range goals for the land. If ASLD had a disposition plan in place, **as it is statutorily obliged to have**, ASLD could demonstrate that this project is not driven by an external stakeholder but that it is timed to yield the highest possible returns. Because there is no disposition plan in place, ASLD can do none of these things.

Sale of this land to Copper World in the absence of a statutorily-mandated disposition plan is a violation of ASLD’s statutory duties under A.R.S. §37-132 that require that the Commissioner administer State Trust Land in the best interest of trust beneficiaries. Under the Enabling Act, ¶ 28, “Congress required Arizona to hold the granted land in trust, and only allowed disposal of the trust land subject to very specific and restrictive conditions.” *Fain Land & Cattle Co. v. Hassell*, 163 Ariz. 587, 589 (1990). Any disposition of trust land not in substantial conformity with the Enabling Act is “null and void.” *Id.* “The rationale behind these strict requirements is that prior land grants to other states were improvidently managed, to put it mildly, and Congress wanted to ensure that the legislatures of Arizona and New Mexico would not dissipate the granted land.” *Id.* The disposition of State Trust Land is limited by “*both* the Enabling Act *and* the state constitution [Ariz. Const. art. 10, § 1].” *Id.*

“When Congress passed the Enabling Act, it intended to severely circumscribe the power of state government to deal with the assets of the trust,” and “all doubts must be resolved in favor of protecting and preserving trust purposes.” *Ne. Phoenix Holdings, LLC v. Winkleman*, 219 Ariz. 82, 85, 1¶ 13 (App. 2008).

ASLD may only “cause state lands to be sold if the sale of them **is not prohibited by law.**” A.R.S. § 37-233(A).

Here, ASLD is planning to dispose of the Sale Parcel not in strict conformity with its statutory and constitutional fiduciary duties, and such sale will be unlawful.

c. Copper World has no immediate need for the Sale Parcel

Delaying the auction of the Sale Parcel does not harm Copper World. Copper World is on record as claiming that it does not need the Sale Parcel for at least 15 years.

In its 2023 Preliminary Feasibility Study, Copper World states that it has sufficient space for mine tailings at two other waste dumps for 15 years before it may require the Sale Parcel. Copper World considers this third waste site on the Sale Parcel as “optional.” See Copper World Pre-Feasibility Study, July 1, 2023, Pg. 18-5.

Waiting until ASLD has completed its mandated disposition plans serves many purposes (see above), including that the Sale Parcel will increase in value as time passes. Copper World’s proclaimed need for the land will not go away. Copper World is likely to retain its interest in acquiring the land for its proclaimed purposes.

The state trust can only benefit from doing this sale properly, in compliance with law, properly appraised (see below), at the right time, to the highest bidder. That time is not now.

d. The Appraisal is invalid because it fails to account for the impact of Copper World’s proposed use on other State Trust Land and also grossly undervalues the Sale Parcel

All State Trust Lands “before being offered, shall be appraised at their true value.” Enabling Act, § 28; *Ne. Phoenix Holdings, LLC v. Winkleman*, 219 Ariz. at ¶ 12.

Here, the Appraisal is invalid because it grossly undervalues the Sale Parcel.

The Appraisal notes that the “highest and best use” of the property “was formed, utilizing resources to identify such factors as land use, supply and demand, governmental requirements, environmental concerns, and economic elements, present and anticipated, which may impact upon the marketability of the property.” Appraisal at 5. But the Appraisal failed to take into account the actual use of the Sale Parcel and the impact of that use on surrounding State Trust Land and the community.

First, the Appraisal states that the Sale Parcel “could also be utilized by the adjacent planned copper mine,” for “the above ground storage of mine tailings for support of mining operations by Copper World.” Appraisal at 24, 36. The Appraisal concludes that “the maximally productive highest and best use of the subject land is for either investment or for development as part of Copper World Inc.” *Id.* The Appraisal, however, did not consider any of the negative impacts to nearby State Trust Land that will occur from the development of the Copper World mining complex and the expansion of its waste dumps that the sale facilitates. The Appraisal completely ignores the negative impact of groundwater depletion on thousands of acres of State Trust Land immediately east of Copper World’s primary well fields and on ASLD’s 52,000-acre Santa Rita Experimental Range immediately to the west of the Sale Parcel. The SRER is required by state statute to be operated for “ecological and rangeland research” purposes. Laws 1988, Ch. 76. Copper World will require at least 9,000 acre-feet of fresh water a year to operate. The company intends

to extract groundwater from wells it has drilled immediately east of the Santa Cruz River and west of the SRER. The company has estimated in corporate filings that the mining operations could last more than 44 years. ASLD has conducted no studies to determine how this groundwater depletion will impact the value of the SRER and other nearby State Trust Land.

ASLD has previously (and recently) addressed the negative impact that large-scale copper mining operations can have on the value of the State Land Trust. In a 2019 letter sent to the U.S. Forest Service in connection with the Draft Environmental Impact Statement for the proposed Resolution Mine near Superior, ASLD determined that the sale of State Trust Land to Resolution Copper for use as a tailings dump would result in **substantial groundwater depletion** that would negatively impact the value of nearby State Trust Land by **more than \$536 million**. See **Exhibit B** hereto. ASLD subsequently filed a formal objection to the Resolution Mine on August 4, 2025 in a federal court proceeding, citing concerns about groundwater depletion and subsidence that would negatively impact State Trust Land. See **Exhibit C** hereto.

ASLD is faced with an identical situation here, with the sale of the Sale Parcel to Copper World for use as a tailings dump. ASLD must conduct a similar analysis as it did with the Resolution Mine to determine the negative impacts on the value of State Trust Land from the sale of the Sale Parcel to Copper World. This information must be included in any subsequent appraisal.

Second, the Appraisal is based on a classification of the Sale Parcel as Rural Homestead (RH) under Pima County's Zoning Code. Appraisal at 17, 22. "The principal uses allowed by this zoning designation are low density residential, limited commercial use, agriculture use, and governmental uses." Appraisal at 18, 22. The Appraisal acknowledges that the Sale Parcel will not be used for any of these permitted uses and that the proposed use is industrial use (mine tailings). Appraisal at 24, 36. And yet the Appraisal failed to appraise the land's value based on this use; instead, the Appraisal looked only at residential values, and other vacant land values. Appraisal at 19-21, 25. Appraising the Sale Parcel as residential is not the "true value" of the Sale Parcel. The "true value" of the Sale Parcel must be based on its worth to Copper World, the applicant and likely only conceivable bidder, which admits it is going to use for a tailings storage facility. The ability to use the Sale Parcel as a tailings pile increases the profitability of Copper World's project. Its 2023 Pre-Feasibility Study states the company could process an additional 41 million tons of copper ore, worth hundreds of millions of dollars, if it could acquire this additional land for its mine tailings.

The Sale Parcel is worth many multiples more to Copper World than \$993,000.00 (the amount of the Appraisal based on residential use), and the Trust is entitled to that considerably higher "true value."

Moreover, ASLD has treated Copper World differently and beneficially, to the detriment of the Trust, by not taking into account factors that serve to increase the value of the land, as it has often done in the past, where ASLD has used its discretion to require “assumptions” that increase the value of Trust Land and has done so when Pima County was seeking to buy land but did not do so when Copper World requested the Sale Parcel.

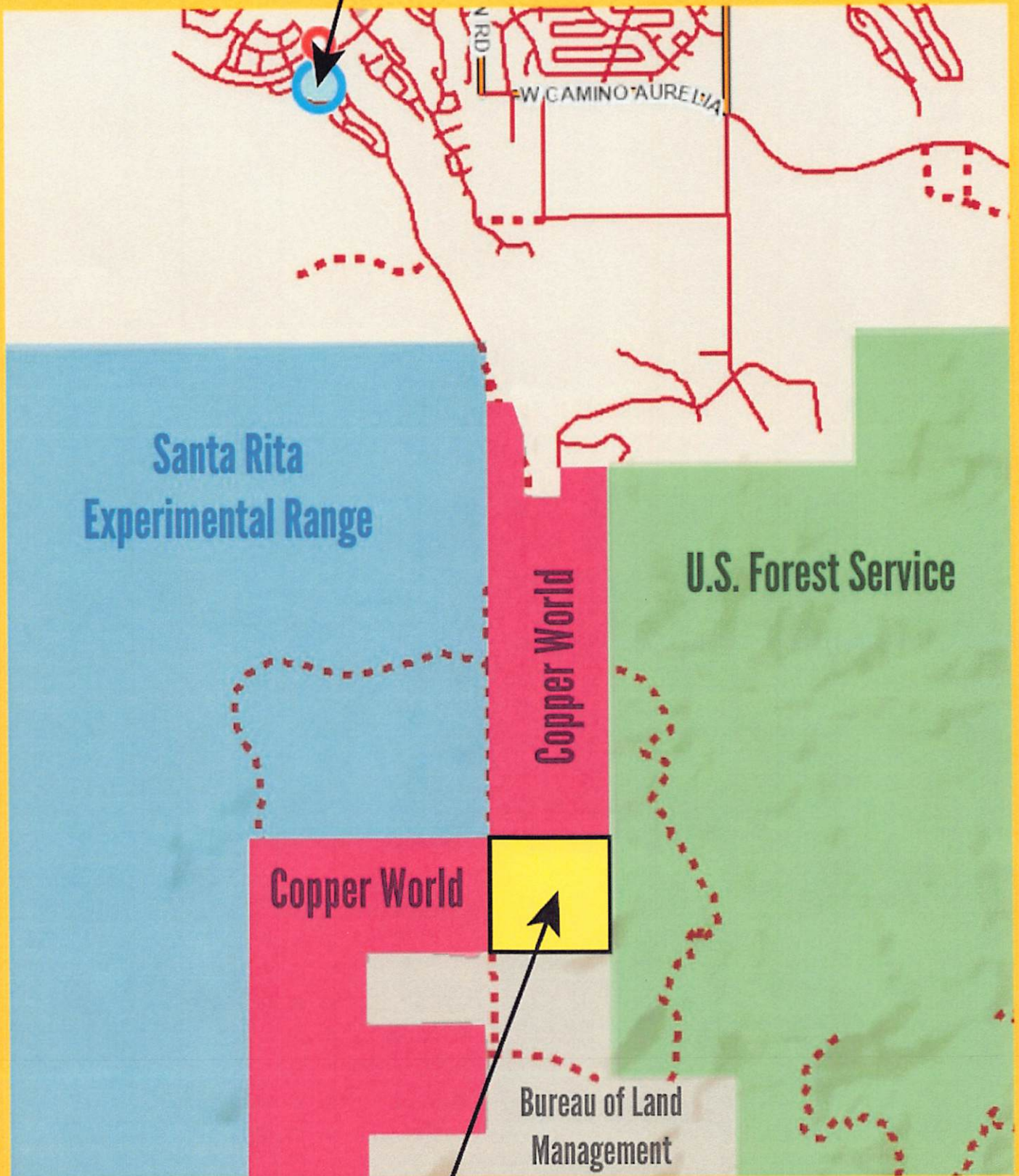
In sum, the Appraisal is arbitrary and capricious and invalid because it fails to include an analysis of the negative impacts on surrounding State Trust Land that will be caused by groundwater depletion resulting from Copper World’s operations and use of the Sale Parcel, and fails to take into account the “true value” based on Copper World’s proposed use for the land.

For all the above reasons, the Commissioner is respectfully requested to cancel the Auction.

Kind regards,
/s/ Adriane Hofmeyr
Adriane J. Hofmeyr

EXHIBIT A

Copper Ridge Elementary School



Parcel of land being discussed

EXHIBIT B

Firefox

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Appendix R



 Douglas A. Drury
 Governor



 Lisa A. Adkins
 Commissioner

Arizona State Land Department
 1001 West Adams, Phoenix, AZ 85007
 (602) 354-6400

November 7, 2019

Ms. Neil Borsworth
 District Supervisor
 Tonto National Forest
 PO Box 34468
 Phoenix, AZ 85067-4468

RE: Resolution Copper Draft Environmental Impact Statement Comments

Dear Supervisor Borsworth,

As a cooperating agency, the Arizona State Land Department (ASLD) appreciates the opportunity to submit comments for the record on the Resolution Copper Draft Environmental Impact Statement (DEIS).

The ASLD manages a perpetual land Trust consisting of approximately 9.2 million acres located throughout the State, including subsurface mineral estate. Our comments reflect ASLD's responsibility to ensure that the land is best managed on behalf of the Trust's beneficiaries and therefore, ASLD must evaluate the potential risks and contributions for all projects on land and resources within the Trust.

ASLD recognizes and appreciates the mineral development, financial, technological, and career opportunities that Resolution Copper brings to the State, and ASLD supports the advancement of the project. However, ASLD does have concerns regarding the selected preferred alternative tailing facility site within the Skunk Camp/Dripping Springs Valley. The location is predominantly State Trust land, and it is highly likely that this location will adversely impact the Trust.

This comment letter constitutes the official response of ASLD and has been organized into the following sections: 1) general comments (including the location of the preferred alternative tailing location at Skunk Camp); 2) DEIS comments from internal ASLD subject matter experts; and 3) concluding remarks.

GENERAL COMMENTS:
SKUNK CAMP TAILING FACILITY – PREFERRED ALTERNATIVE

ASLD acknowledges that the Skunk Camp tailing facility location has been identified as the preferred alternative in the DEIS prepared by the Tonto National Forest (TNF). ASLD prefers Silver King as the location for the tailings site, as it is located on federally managed land and requires significantly less water over the life-of-mine (LOM). In contrast, the Skunk Camp alternative location is comprised of over 65 percent State Trust land and requires much higher volumes of water to support the tailing slurry pipeline.

The greatest potential adverse impact to the Trust will be the water (range of approximately 600,000 acre-feet (AF) over the LOM) that will be extracted from the aquifer beneath the Superstition Vista Planning Area (SVPA). This level of water consumption is partially a result of the potential need to transport a projected 1.7 million tons of waste material to the Skunk Camp location. Based upon the anticipated groundwater requirements contained in the DEIS, the negative impact of the proposed water consumption from the Superstition Vista Planning Area (SVPA) far outweighs the estimated financial benefits to the Trust resulting from other aspects of the project by a factor of 20:1 (based on current growth projections for the Pinal County portion of the East Salt River Valley developed by the Maricopa Association of Governments).

ASLD is also concerned that a potential sale of the State Trust land directly at or near the Skunk Camp property would not adequately recognize the future value of the Skunk Camp property and fails to consider the inherent decrease in surrounding property values once the facility is established. As this area is immediately adjacent to the SVPA, it has future value as recreational, development, or open space property that supports the anticipated growth in the SVPA. By encumbering a large area with mine tailing storage, the surrounding State Trust land will be depreciated to the detriment of the Trust.

The Skunk Camp location would require a US Army Corps Jurisdictional Determination (JD) for the Dripping Springs Wash. If this watershed were determined to be a Jurisdictional Watershed of the U.S., this decision could greatly compromise ASLD's ability to realize the highest value for these State Trust lands located downstream. As upstream determinations set precedence, this JD has the potential to expose these lands to additional Federal regulation that they would not have absent such a determination.

SUBJECT-SPECIFIC DEIS COMMENTS:
WATER IMPACTS

Resolution's proposed withdrawal of water for mining operations from wells to be drilled along the MARICOPA (Magnum Arizona Railroad Company) rail corridor is estimated to range from 180,000 AF to as much as 600,000 AF over the LOM. Resolution has stored and obtained Long-Term Storage Credits (LTSCs) for approximately 313,000 AF of Central Arizona Project (CAP) water, of which approximately 256,000 AF are located within the Phoenix Active Management Area (AMA). However, the location along the rail corridor where Resolution proposes to withdraw the water is outside the area of hydrologic impact (ADI) where the water storage occurred. Therefore, the local aquifer in the central portion of the SVPA, and not the north where the storage occurred, will be the aquifer impacted by Resolution's proposed withdrawals. In terms of a 100-year Assured Water Supply (AWS), the water represents the equivalent of an annual build-out demand of up to 6,000 AF per year (AFY).

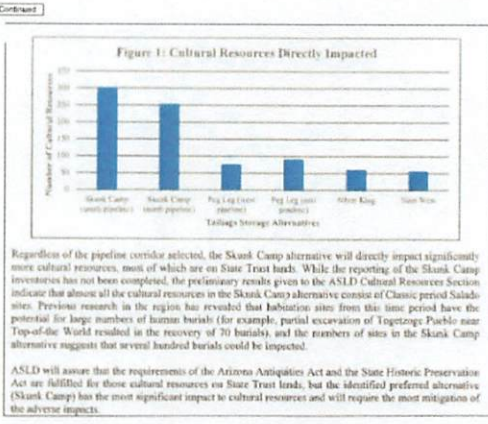
Resolution could partially mitigate this impact by withdrawing its 256,000 AF of Phoenix AMA LTSCs from within the ACF of storage. This would have the effect of reducing the local area impact in the central SVPA to around 3,440 AFY. Even with this mitigation, at a density of three units per acre, assuming three persons per household, and using a water demand of one AFY per acre (Source: Arizona Department of Water Resources' Fourth Management Plan models for new single-family residential development), Resolution's withdrawals, if mitigated by recovering the LTSCs from within the ACF of storage, would still potentially result in the loss of the development of at least 3,440 acres of State Trust land. State Trust land has recently been auctioned for residential development in the area near the SVPA for approximately \$136,000 per acre. Therefore, even with partial mitigation, the loss of 3,440 acres of developable State Trust land represents a minimum potential loss to the Trust of at least \$536,640,000 in revenue.

SLURRY PIPELINE ON STATE TRUST LAND

In order to minimize the amount of water necessary to supply the Skunk Camp alternative location's slurry pipeline, the tailings should be dewatered to the maximum extent possible with the most current technology. The recovered slurry water should then be recycled (in addition to any contaminated groundwater pumped from beneath the tailing facility) and reused within the system.

Skunk Camp's proposed slurry pipeline would be constructed over eight miles of State Trust land in the Dripping Springs Mountain. In order to minimize the potential environmental risk, ASLD requests that all components of the pipeline be engineered and constructed pursuant to best management practices to reduce the possibility of a breach or spill occurring on State Trust land. These design methods may include using thick single-walled or double-walled pipe sections lined with high-density polyethylene, installing a comprehensive pipeline monitoring network, and peer review of the construction and design.

ASLD also requests that TNF provide written confirmation acknowledging approval of the pipeline corridor that crosses land under its jurisdiction. Receipt of this document is necessary for ASLD to begin issuing Right-of-Way for the selected pipeline alignment.



CULTURAL RESOURCES OF SKUNK CAMP

The results of cultural resources inventories for all alternatives have not yet been fully reported or evaluated. The DEIS provides some preliminary numbers for the significant cultural resources that will be directly impacted based on the different alternatives. These are the cultural resources that have been recommended as eligible for listing on the Arizona and National Registers of Historic Places (ANRHP) and those that need testing to determine their register eligibility. Final determinations of eligibility and effect have not been completed, but the preliminary numbers indicate that the Skunk Camp alternative will directly impact significantly more cultural resources than any of the other alternatives (Table 1). Skunk Camp with the North Pipeline alternative will impact 2.4 to 4.5 times more cultural resources than the other alternatives, while the South Pipeline alternative will impact 1.3 to 5.4 times more.

Table 1. Cultural resources directly impacted by the different alternatives

Tailing Storage Alternatives	Cultural Resources Directly Impacted
Skunk Camp (South Pipeline Alternative)	301
Skunk Camp (North Pipeline Alternative)	253
Peg Leg (West Pipeline Alternative)	75
Peg Leg (East Pipeline Alternative)	90
Silver King	60
Near West (both Alternatives 2 and 3)	56

LESSEE IMPACTS OF SKUNK CAMP

The Skunk Camp tailing facility greatly impacts several long-term ASLD grazing lessees and compromises future revenue generation for the Trust. A total of three grazing leases are likely to be impacted with an estimated minimum loss of 113 animal units. Over the approximately 40-year LOM, the Trust will recognize an estimated grazing revenue loss of \$80,000 at the Skunk Camp location.

Additional impacts to grazing lessees downstream from the mine may include the potential loss of surface water for which skiers have been filed in the General Stream Adjudication. Loss of surface water may require lessees downstream of the mine to install wells to provide stockwatering.

CONCLUDING REMARKS:

ASLD appreciates the time and efforts of the collaborative TNF and SWCA teams in producing the multi-year DEIS project, and for ASLD's ability to participate as a cooperating agency on behalf of the State Land Trust and its Beneficiaries.

Appendix R

The Resolution Copper project has the potential to positively and negatively affect future development within the region. As the mine expands, available housing will be in short supply in the East Valley and this may act as a constraint for the development of land within the SVPA. As demand for housing increases, the corresponding land values will increase. The Trust has the opportunity to recognize significant future revenue from these land sales. Conversely, the extraction and transportation of groundwater out of the SVPA greatly compromises the ability to develop these lands to their full potential, and as a result, reduces the income and value of the Trust.

Comment ID: 242-13
Response: NS1

ASLD requests continued involvement in the completion of the final Environmental Impact Statement (EIS) as a cooperating agency stakeholder. ASLD asks that the TNE's project team continue to work with ASLD's Mineral, Cultural Resources, and Water Rights sections throughout all remaining stages of the EIS process. ASLD points of contact for this project include Aaron Magezi (amagezi@arizona.gov) regarding minerals and rights-of-way, Pam Maize (pmaize@arizona.gov) regarding water rights and Michael O'Hara (mohara@arizona.gov) regarding cultural resources.

Sincerely,

Lisa A. Akim
Commissioner
Arizona State Land Department

LORANZO SERRA
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COMMITTEES
LORANZO SERRA
Tonto National Forest Supervisor

October 14, 2019

Tonto National Forest
Resolution EIS Comments
PO Box 34468
Phoenix AZ 85067-4468

Re: Resolution Copper DEIS comment

To whom it may concern:

As a longtime Arizonan, former city council member and legislator, I understand the importance of copper to the state. I have taken the time to learn about the Resolution Copper project in Superior, and I believe it offers immense value to Arizona. As a mining region with a legacy of tailings, I am encouraged to learn about the reclamation work that has already been done in Superior, and the fact that progressive reclamation will occur as the project moves forward. The economic benefits to the state will be a tremendous asset for decades to come. In a traditional mining region that has faced recent economic hardships, the numerous jobs this project will create will play a role in strengthening the economy in Superior and beyond. It is my understanding many of these will be high-tech STEM jobs, which is important to the United States and Arizona's future economic growth. I commend the U.S. Forest Service for the thorough process it has conducted on this process, and I urge you to complete it in a timely matter. Please don't hesitate to reach out anytime if you have any thoughts or questions.

Comment ID: 252-1
Response: NS1

Sincerely,


Loranzo Serra

LORANZO SERRA
Tonto National Forest Supervisor
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Arizona House of Representatives
Phoenix, Arizona 85007

COMMITTEES
LORANZO SERRA
Tonto National Forest Supervisor

October 29, 2019

Mr. Neil Bosworth
Tonto National Forest Supervisor
United States Forest Service
P.O. Box 34468
Phoenix, AZ 85067-4468
Attn: Resolution DEIS Comments

Mr. Bosworth,


First, I congratulate the United States Forest Service for completion of the Final Environmental Impact Statement for this project, which I support as quickly as possible. Second, I encourage this project to move forward and beyond the scope of a typical NEPA as it relates to tribal lands, engagement and I encourage the project and USFS to continue this practice. Specifically, I am extremely supportive of the Tribal Monitoring Program and Community Working Group which the USFS and Resolution Copper have established to not only engage with stakeholders but also participate in development of the project.

Comment ID: 261-1
Response: NS1

Finally, as the USFS has identified the Blank Camp Alternative as its preferred TSE location can the USFS further analyze the workforce development, job training, and local economic impacts to the communities of Wickenburg, Keown, and Hayden? It is vital that these communities receive benefits that are equal to the long-term impact to their region should the TSE be constructed at Blank Camp.

Comment ID: 261-2
Response: SO10

Thank you for your consideration of these comments during the development of the Final Environmental Impact Statement.

Respectfully,

Robert Meza
House of Representatives
Legislative District 30

LEO BARRUCO
Tonto National Forest Supervisor
P.O. Box 34468
Phoenix, AZ 85067-4468
lbarruco@fs.fed.gov



Arizona House of Representatives
Phoenix, Arizona 85007

COMMITTEES
LEO BARRUCO
Tonto National Forest Supervisor

October 10, 2019

Mr. Neil Bosworth
Tonto National Forest Supervisor
United States Forest Service
P.O. Box 34468
Phoenix, AZ 85067-4468
Attn: Resolution DEIS Comments

Mr. Bosworth,

Thank you for the opportunity to comment during development of the Final Environmental Impact Statement for the Resolution Copper Project. I hope the United States Forest Service has the resources to quickly complete the Environmental Impact Statement for this project, which I support.

Comment ID: 296-1
Response: NS1

As an elected official in rural an Arizona community, I am pleased to see the economic impacts the project will have on the east valley when reviewing the DEIS. This project is vital to our national security and specifically the defense industry which operates in my community. As I think about our state's economic stability, projects like the Resolution Copper project will be vital to a healthy stable economy in Arizona going forward. I understand there will be several thousand construction jobs and more than 1,500 permanent jobs created by the project's development. It is important to create as many jobs in rural AZ, and I am grateful that the Resolution Copper project will do that.

Thank you for your consideration of these comments and questions.

Sincerely,



EXHIBIT C

Katie Hobbs
Governor



Robyn Sahid
Commissioner

August 4, 2025

Reviewing Official, Regional Forester
333 Broadway Boulevard SE
Albuquerque, New Mexico 87102

RE: Arizona State Land Department's Objection to the Resolution Copper Project and Land Exchange and Project-Specific Forest Plan Amendment
Tonto National Forest
Ericka Luna, Deputy Forest Supervisor

The Arizona State Land Department ("ASLD") is a cooperating agency that issued comments on the Draft Environmental Impact Statement ("Draft EIS") by letter dated November 7, 2019. A primary focus of those comments was the impact of the substantial withdrawal of groundwater from the aquifer beneath the Superstition Vistas Planning Area ("SVPA"), which contains 275 square miles of Arizona State Trust Land ("STL"). The proposed "Desert Wellfield" from which groundwater will be withdrawn extends roughly four miles and is surrounded by STL.

ASLD manages a perpetual land trust consisting of over 9 million acres of STL that the United States granted to Arizona upon statehood in the Arizona Enabling Act. The grant is a "solemn promise" by the United States to the State to support the beneficiary purposes set out in the Enabling Act, primarily public education. ASLD has a trust obligation derived from the Enabling Act and Arizona Constitution to manage all those lands for the benefit of the trust's beneficiaries.

The SVPA is a projected location of substantial future expansion of the Phoenix metropolitan area with hundreds of thousands of future residents. Development of the SVPA could bring billions of dollars of additional income to the beneficiaries of the State Land Trust.

Specific Issue: Groundwater Decline and Subsidence in the SVPA

ASLD has significant concerns with the withdrawal of an estimated 544,858 acre-feet of groundwater in the SVPA over the life of the mine, 6.7 percent of all the groundwater available in the entire East Salt River Valley, much of which is STL. Not only will the recent recovery of 60 to 85 feet of depth to groundwater in the area be halted, it will be significantly reversed near the Desert Wellfield, reaching a maximum drawdown of 199 feet at the end of mine operations.

Subsidence. The Draft EIS did not analyze the impact of this decline on ground subsidence other than to note the existing Hawk Rock area of subsidence that currently extends within four miles to the northwest of the Desert Wellfield. In response to public comments, the Final EIS includes new information that attempts to quantify the extent of subsidence that may result from groundwater withdrawal.

The Final EIS estimates that Alternative 6 would result in roughly 24 to 50 inches of subsidence within two miles of the Desert Wellfield, which encompasses approximately 20 square miles or 12,840 acres of STL. The Final EIS reasons that subsidence will occur where groundwater withdrawal causes the water table to drop below its historically recorded lows. The removal of this water will cause the compaction of the earth from which the water has been removed. The Final EIS estimates that Alternative 6 will cause the water table in the area of the Desert Wellfield to drop to 80 to 120 feet below historical levels. Moreover, as the Final EIS acknowledges, even though the Final EIS projects that the water table in the area will rebound following the life of the mine, subsidence is irreversible, the ground will not return to its prior level, and the ground will not be able to store as much water as it had previously.

Alternatively, or in addition, although not discussed in the Final EIS, expansion of the existing Hawk Rock subsidence area to the northwest, which also contains miles of STL, may accelerate.

While the impacts of subsidence are not predictable and may be minimal on land that is not yet developed, the ongoing process of subsidence and the potential formation of earth fissures in the subsidence area present a risk to the future development of the land and the value of STL in the area. As noted in the Final EIS, earth fissures can directly damage structures as well as infrastructure including roads, utility lines, wells, and canals. Mapped earth fissures have already been identified in areas not far from the Desert Wellfield.

Groundwater available for development of the SVPA. ASLD's 2019 Draft EIS comment concluded that Alternative 6 would essentially preclude the development of 3,440 acres of STL at a cost of a half-billion dollars to the State Land Trust. Since that comment, however, the hydrological and legal contexts of development in the Phoenix Active Management Area (AMA) have changed. In 2023, the Arizona Department of Water Resources completed its Phoenix AMA groundwater flow model and published an official 100-year Assured Water Supply projection. Due to regional projected groundwater declines and unmet demands, new Assured Water Supply determinations based solely on groundwater cannot meet the physical availability criteria necessary to comply with the Assured Water Supply rules and regulations. ASLD cannot rely on groundwater for future residential development in the area, so ASLD's 2019 calculations would not apply today.

Nonetheless, the Project's groundwater withdrawals will have significant adverse impacts on the regional aquifer underlying 275 square miles of STL. The FEIS modeling of Alternative 6 shows a maximum drawdown of approximately 200 feet in the center of the wellfield below current water levels, with declines of approximately 100 – 130 feet at its edges. This pumping associated with Alternative 6 would decrease the likelihood that groundwater could be used for new development in the future as hydrological and legal contexts continue to evolve, adding

additional groundwater depletion to an already stressed groundwater sub-basin. Moreover, the extensive, concentrated withdrawal of groundwater may make existing, committed groundwater uses near STL more expensive and more complicated as water levels decline. The value of the as yet undeveloped STL would thus suffer from the potential additional water supply obstacles to already committed uses, which could delay or eliminate demand for STL.

Proposed Remedies. ASLD understands that withdrawal of groundwater from the Desert Wellfield is necessary for operation of the mine. This groundwater extraction and the potential for subsidence can significantly affect the SVPA, and Resolution Copper should undertake measures to alleviate the impact to the aquifer and surrounding STL. Some potential measures that may mitigate much of the anticipated impact of subsidence and groundwater depletion in the East Salt River Valley, the vast expanses of STL, and its thousands of anticipated future residents, may include utilization of hydrologically connected long-term storage credits prior to any unreplenished groundwater withdrawals, adoption of a method of filtered or dry tailings instead of slurry tailings, or other more advanced and less water-intensive tailings technology, or other measures such as increasing recharge or reducing existing groundwater withdrawals which may also serve to mitigate the proposed groundwater use of the mine. This is not an exhaustive list of potential remedies, and we remain open to discussing options that may have been overlooked.

Thank you for the opportunity to document these concerns as part of the objection review process and I ask that you, as the Objection Review Official, seek to facilitate discussions with Resolution Copper and the Responsible Official to address these concerns in a timely manner. I welcome the opportunity to continue discussions on potential measures that will reduce the amount of groundwater pulled from the Desert Wellfield. I can be reached in writing at the mailing address listed on the letterhead, via phone at (602) 542-4631 or via email at CO@azland.gov.

Respectfully,



Robyn Sahid
Commissioner