Message

From: Mahdavi, Sarvy [Mahdavi.Sarvy@epa.gov]
Sent: 5/15/2019 10:03:11 PM
To: Ziegler, Sam [Ziegler.Sam@epa.gov]
Subject: FW: 3.7.2 - Groundwater and Surface Water Quality: Resolution Copper DEIS
Attachments: 3.7.2_GWSWQuality_April23_Rewrite.docx; For reviewers_figures referenced in 3-7-2.docx; APP_J_GWSWQual_DEIS3_April23_Rewrite.docx; APP_K_GWSWQual_Figures.docx; 3.7 Water_BP_Rewrite_April23.docx

Importance: High

Analyses sent by USFS for Resolution Copper Mine.

From: Hoffman, Hugo
Sent: Wednesday, May 01, 2019 1:23 PM
To: Bolt, Matthew <Bolt.Matthew@epa.gov>; Sheth, Gary <Sheth.Gary@epa.gov>; Tinger, John <Tinger.John@epa.gov>
Cc: Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>; KELLY, PATRICKJ <kelly.patrickj@epa.gov>; Vollmer, Jared <Vollmer.Jared@epa.gov>; Goldmann, Elizabeth <Goldmann.Elizabeth@epa.gov>
Subject: FW: 3.7.2 - Groundwater and Surface Water Quality: Resolution Copper DEIS
Importance: High

Hi Matt, Gary, and John-

Attached is the Forest Service's analysis for potential impacts to surface water and groundwater quality from the proposed Resolution Copper Mine. I've given a heads up to most of you about this – and now we have it. (John, I left you a vm, but let's discuss to catch you up.)

Could you provide your comments to me on the "3.7.2_GWSWQuality_April23_Rewrite.docx" document in **tracked changes** (per the Forest Service's request) by COB May 13? That will give us time for me to merge our comments and have a discussion together before I send them on the 16th.

There are several purposes for your review: 1) to assess the reasonableness of the Forest Service's analysis (to evaluate whether the predictions of impacts can be considered reliable based on best-available science, and are they communicated clearly), 2) to identify significant environmental issues related to our expertise and jurisdiction, and 3) to ensure consistency with your program's regulatory requirements.

In addition, now would be the time to highlight impacts that warrant mitigation and to provide ideas for mitigation methods. We may not deliver this to the Service as part of this review, but I would appreciate your comments on these issues at this time.

If you need to review any supporting references cited in their analysis, let me know and I will provide them to you.

I will schedule a time to talk together earlier in the week that our comments are due. If you foresee any problems meeting the review deadline, please let me know as soon as you do. Also, please let me know if you think anyone else at EPA should be included in this review.

Thanks for your help! Please let me know if you have questions or concerns.

Regards,

Hugo Hoffman
U.S. Environmental Protection Agency, Region 9
Environmental Review Branch

75 Hawthorne Street
San Francisco, CA 94105
telephone: (415) 972-3929 | fax: (415) 947-8026
hoffman.hugo@epa.gov

From: Rasmussen, Mary C -FS <mary.rasmussen@usda.gov>
Sent: Wednesday, May 01, 2019 12:22 PM
To: Gazzetti, Edward - FS <edward.gazzetti@usda.gov>; Hoffman, Hugo <hoffman.hugo@epa.gov>; KELLY, PATRICKJ <kelly.patrickj@epa.gov>; slade.edwin@azdeq.gov; harrison.wayne@azdeq.gov; tiller.ronald@azdeq.gov; rpitts@blm.gov; ccrowder@azgfd.gov; jabplanalp@azland.gov; Michael Langley <michael.w.langley@usace.army.mil>
Cc: cgarrett@swca.com; dmorey@swca.com
Subject: 3.7.2 - Groundwater and Surface Water Quality: Resolution Copper DEIS
Importance: High

Thanks for your patience!
For your review -
Here is the latest draft of water quality impacts described for the Resolution Copper Mine Project.

The earlier version included affected environment but lacked the results of the analysis of environmental consequences. The attached supporting documents include:

- A revised section 3.7.2 in WORD format
- Appendix J (5 water quality tables we felt could be moved from the text; this was already in the previous version but has been modified).
- Appendix K (a new appendix with 30 water quality figures for constituents of concern).
- The portion of the impact summary table from Chapter 2 applicable to the water sections. This is a work in progress, but this represents the latest iteration for the water sections and may be useful to your review.
- The most recent version of the water resources process memo.

REVIEW INSTRUCTIONS:

- Please focus your review on the 'GWSW Quality April23 Rewrite' document. Relevant comments on the other documents are definitely okay – just a lower priority if you're short on review time.
- You can provide your review comments directly in the Word document using the 'Track Changes' option.
- For improving the content of the DEIS, your review comments of this section would be most helpful if received by COB on Thursday May 16.
- We recognize that there was no estimate of when this section would be available for review – we have a hard deadline of June 3 for completing all changes. We won't be able to accept review comments after May 23.
- Please send your comments directly to me with a CC to Donna Morey (dmorey@swca.com).
- Notes about this analysis and write-up:
    - This is a long but critical section (currently 60 pages).
    - This is a very complicated analysis and portions of the methodology section are important to a reader just to be able to understand the rest of the section, particularly the connection of the various modeling components.
    - The background reports are numerous, convoluted, confusing, and (to the uninitiated) even duplicative. The methodology section also serves as a roadmap for where to find the actual data.
    - The NEPA team feels pretty strongly that the uncertainties involved are one of the key takeaways. Much of the methodology section focuses on those uncertainties (roughly 20 pages of a 60 page section).
    - Suggestions for what isn't critical to the DEIS section and could be moved to the process memo are welcome.
    - We focused on a careful separation between ADEQ permitting and Forest Service disclosure. Give us feedback on if we've described the situation adequately.
    - This document has not been through formatting, so some things like tables and their footnotes look rough. The one thing that should be mostly okay are the references.

- If you need a reference and can't find it in the SharePoint folder – send Donna an email and SWCA will get it loaded there ASAP.

You can direct any immediate questions about these materials – and we will get you answers to facilitate an effective NEPA document review.
Thanks for your continued interest and agency support of this project!

Mary C. Rasmussen, Team Leader
Resolution Copper Mine EIS

Forest Service
Tonto National Forest

p: 602-225-5246
c: 480-710-7304
mary.rasmussen@usda.gov

2324 E. McDowell Rd
Phoenix, AZ 85006
www.fs.fed.us

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