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**Subject:** Public Comment Submission  
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[Plumas Sun - O & A.pdf](#)  
[Regulatory Steps for Developing a Mine in California - Flowchart.pdf](#)

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Tracey,

Attached are two submittals for the public comments on behalf of US Copper.

Best regards,

**James DeCarolis**  
Project Manager



*Mine Permitting/Compliance/GIS & Aerial Mapping*

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**Plumas Sun – Q & A:**  
**Engels-Superior Vested Rights Determination**

**Submitted to:**  
**County of Plumas**  
**Planning**  
**Department**

**Submitted by:**  
**US Copper Corp**  
**Engels-Superior**  
**Mines**

**April 2024**

US Copper Corp. was interviewed by the Plumas Sun regarding the on-going Engels-Superior vested rights proceeding. Below is the full list of questions and answers.

- 1. Please list your full name, title, and affiliation, as you would like them to appear.***

Steve Dunn, CEO, US Copper Corp

- 2. Can you share with us a little about US Copper Corp? What is the organization's mission and business model? What have been some of your notable past projects?***

US Copper Corp (USCU) is a relatively new junior mining exploration company. The role of a junior mining company is to identify and advance mineral deposits, through exploration and engineering studies, to the point where economic viability can be demonstrated.

Our shareholders tend to be small retail investors that understand the need for commodities in today's economy and are prepared to risk their capital in the hope that US Copper can attract further investment to develop a mine.

- 3. What attracted the organization to the Engels mine property, and what makes it a good fit for the business?***

Mining exploration and development is a very risky business as economic deposits are very difficult to find. If a junior mining company can acquire a project that has historic production and resources still available, then that company has just eliminated a large portion of the risk in exploring for an economic deposit.

The Engels Mine property is part of the Moonlight Superior Project which includes 2 historical copper mines: the Engels Mine and the Superior Mine. There are two other known copper deposits, Moonlight and Lamb's Ridge, that are within the project. In total, it is estimated that there is over 3 billion pounds of copper in the 4 deposits identified.

This project only became available in 2012 after the global financial crisis that began in 2008 caused major weakness in the commodity and investment markets. USCU was attracted to this project because very few deposits of this size ever become available, and the financial crisis meant few companies were then looking for opportunities. The project also had a number of other very

attractive features: it offered secure title because it was in the USA along with vested mining rights on property which has always been used for mining and exploration; there was adequate infrastructure nearby which helps the project economics; the deposits are at surface which keeps engineering straightforward; and the rock is metallurgically attractive in that the copper is easily recoverable and the base rock (and tailings) do not generate acid runoff.

**4. *What will be the next steps for US Copper if the vested rights application currently under consideration is approved in May?***

Once vested rights are confirmed, US Copper would begin to develop a mine plan for Superior and Engels Mines. This mine plan is needed to prepare applications for the additional permits that are required, as well as the mandatory Reclamation Plan. It will take at least a year to prepare an initial mine plan, and more drilling and studies will then be required before a bankable feasibility study could be prepared which will be needed to attract the required capital to build a mine.

**5. *If the zoning administrator denies vesting, will you appeal to the county board of supervisors?***

Our review of the facts and applicable law supports the existence of a vested mining right at this site. We are hopeful the Zoning Administrator will agree with us. If not, we will consider our options at that time. It is important to remember that the matter before the County is only an evidentiary proceeding to determine the existence of vested rights based on historical mining activities. This is not a land use hearing to consider whether to approve a permit to mine.

**6. *If the supervisors deny your appeal, will you file a lawsuit?***

It is premature to consider legal options in response to future County actions that may or may not happen. We believe that the vested rights exist and that there is a path forward through administrative channels.

**7. *We have found no public information that describes specific plans for mining at the Engels and Superior mine sites. Please tell us about the size of the pits, how you plan to extract copper and other minerals from ore, how you will handle tailings, and what routes you will use to transport minerals out of the mine area.***

We have not yet developed any mining plans for either the Engels or Superior deposits based on current economic conditions. We are currently defining the oxide resource at Engels and doing some metallurgical tests. These studies are needed before we can begin planning any possible mining options.

It is possible that any mining operation would eventually include adjacent USFS lands, and it would then be necessary to obtain approval of a Plan of Operations (permit) from the US Forest Service before that could happen. This process for the federal portion of the project would be subject to NEPA and a host of other regulatory requirements and permits. In addition, a Reclamation Plan will need to be approved by the County and will be subject to CEQA review. In California, SMARA requires that any metals mine must be backfilled with the overburden that is removed from the mine to extract the ore. The public will be involved in each of these proceedings.

**8. *Do the public descriptions of mining at the Moonlight site represent the processes you plan for Engels and Superior?***

This is a complicated question. The mining descriptions you refer to are in a document titled "Preliminary Economic Assessment on the Moonlight deposit". It is not a full-fledged mine plan, but an economic study to establish whether an ore body might be profitable at certain commodity price levels. The mining plan within that study itself is preliminary and subject to major changes such as mining methods and volumes. Anything specific to Moonlight is not necessarily applicable to Engels-Superior either because of differences in deposit size, ore characteristics, location, and other assumptions.

Having said all that, there are a limited number of mining methods and processes available to us, and there is bound to be some overlap and similarities in the mining practices used at all of these deposits. And again, the Moonlight deposit is on federal land, and is not subject to vested rights. It cannot be mined without NEPA review and approval of a plan of operations.

**9. *It's fair to say that the response to the proposed project has been mixed, with some community members advocating against the project. Has the public response come as a surprise?***

We were not surprised at the level of interest in the mining plans at our property but we have been surprised at how the issue of vested rights has been misrepresented.

We believe there is a misconception on the scope of vested rights and specifically what our application has asked the county to review. We've asked for an acknowledgement of vested mining rights on the Engels and Superior mine parcels. Some community members have concerns that if those vested rights are acknowledged, we would be able to "extend" the vested rights beyond the property boundary onto neighboring USFS mining claims that we own. We've heard some worries that this would increase the size of our project from 735 acres (Engels and Superior properties) to over 13 square miles. To be clear, that is not how vested mining rights apply. They do apply to an entire property that has vested rights but they don't extend beyond the property boundary onto adjacent federal lands that are subject to federal mine permitting requirements. That's why any mining done on adjacent USFS lands would need to be permitted through an approval of a federal Plan of Operations and NEPA review by the US Forest Service. The vested rights on the privately-owned Engels and Superior properties would have no effect on the permitting process for mining on the adjacent USFS lands. Furthermore, vested rights do not mean that we can avoid various state and federal permits required to mine on the Engels and Superior property, nor can we avoid filing an acceptable Reclamation Plan with the County.

Community involvement, which does include opposition and support, is a given with any mining project, no matter how small. We understand this project will have impacts on the community, both positive and negative. We also understand that the community deserves to be involved in the planning and monitoring stages, and to be protected by the regulators against any and all risks. In our experience, one of the most challenging aspects of the public process for a mining project is public education. It is not uncommon for fears and misinformation to overwhelm the facts surrounding a mining project. US Copper remains committed to getting the real facts out to the public to allow for a meaningful and honest dialogue about our project.

**10. Please respond to the general community concern over long-term environmental degradation, particularly to streams and the water table.**

We have detailed the various permitting requirements that extend beyond SMARA in our submissions, and I have enclosed two of those submissions here for your review.

We are living with a heritage and reputation that stems from time periods when there were no mining regulations or environmental restrictions, and when major environmental damage did occur. I would respectfully point out that current environmental controls over mining operations in the USA are mandatory, thorough and all encompassing. This is even more so the case in California which has a reputation for being overregulated in most aspects. I believe they ensure that any impacts are limited to the mining site itself and reclamation plans ensure the mining site is also restored as best possible.

**11. How does US Copper plan to mitigate the community's concerns?**

As USCU begins preparing a mine plan for the various deposits we will engage with the public to address future concerns. These areas of concern would include, but not be limited to, impacts on water, streams, noise, air quality, traffic, employment, housing, taxation, reclamation. When USCU has prepared a final mine plan and begins the permitting process, the public will also have an opportunity to participate in the public hearings that are part of the permitting process.

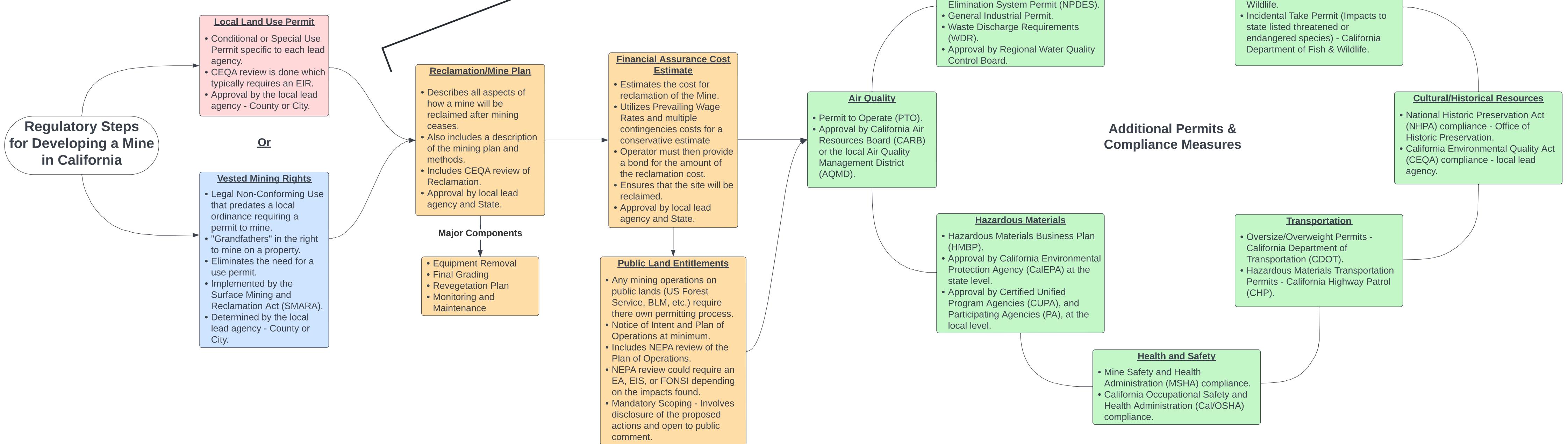
**12. Can you share with us a little about your larger vision for mining in Plumas in the longer term?**

Our hope is that the project that includes the Engels/Superior/Moonlight deposits becomes the largest employer in Plumas County for decades to come, providing large direct and indirect benefits to the entire community.... something that the entire community can be proud of.

**13. Is there anything else that you'd like the public to be aware of regarding the proposal?**

Norman Lamb has stewarded the Engels and Superior Mines for more than 40 years and that ownership directly led to his families' residency in Plumas County until just a few years ago. These projects would be the culmination of half a lifetime's worth of work both he and Katherine Lamb have dedicated themselves to.

## Regulatory Steps for Developing a Mine in California



## Steps still necessary with Vested Mining Rights

### Additional Permits & Compliance Measures