

November 5, 2019

Mr. Neil Bosworth, Supervisor
Tonto National Forest
2324 E. McDowell Road
Phoenix, AZ 85006

RE: Superior Recreation User Group Comments
Draft Environmental Impact Statement for the Resolution Copper Project & Land Exchange

Reference: DEIS Appendix J, Page J-15 & Attachment 1,
RUG and Superior Trail Network Plan, Recreation Mitigation Measures RC-214 & RC-215

Dear Supervisor Bosworth,

Members of the Superior Recreation User Group (RUG) request that the Forest Service incorporate the RUG plan, as presented in Attachment 1 of Appendix J, in its entirety into the Record of Decision as part of the required mitigation for the combined recreational impacts of the Resolution Copper Project at Oak Flat and Skunk Camp areas.

Further, we request that Resolution Copper Mining establish an endowment to fund the construction of this trail system and partially support long-term maintenance as may be needed to supplement volunteer efforts of user groups.

This group believes that the RUG plan is appropriately crafted to serve as partial mitigation for this project. As presented in the DEIS, combined recreation impacts associated with Oak Flat and tailings Alternative 6 Skunk Camp include the loss of 38 miles of recreational roads, 1,282 acres of area available for dispersed camping as well as loss of Oak Flat Campground, 1,457 hunter days per year with associated reduction in tourist spending of about \$81,000, loss of scenic values and wildlife-watching opportunities to visitors, and loss of rock-climbing access in this highly important location (addressed in mitigation RC-213).

In addition to direct mitigation for project-related impacts, the RUG plan has the potential for attracting regional and even national visitor use due to its unique scenic qualities and connections to other important recreation resources such as the Arizona National Scenic Trail and Legends of Superior Trail, the Boyce Thompson Arboretum, and the services available in the Town of Superior. Implementation of this plan would provide opportunities for 'world-class' outdoor recreation and serve as an important economic development catalyst and anchor to the town and the region.

As background information, The Recreation User Group (RUG), a subcommittee of the Superior Community Working Group, spent nearly 4 years in a collaborative effort to develop and agree on this plan. This was done in consultation with the Town of Superior and the Tonto National Forest, and with financial and technical support from Resolution Copper Mining. This comprehensive effort was intended to coordinate the individual proposals and requests of various recreation user groups. Representatives of all the various recreation user groups have participated in developing the RUG

plan, which accommodates both motorized and nonmotorized users and includes a campground. Both the size of the study area and the number of miles of trails have been substantially pared down from the initial proposals offered, in the interests of environmental impacts and funding concerns. The trail system has been field-verified for constructability, and participating user groups stand ready to support both implementation and long-term maintenance through volunteer efforts. Resolution Copper is offering this plan as mitigation for recreation impacts of the mining project and would therefore be an important potential funding source.

When established, the endowment should be managed by a local nonprofit organization led by the Legends of Superior Trail (LOST) with significant board participation by other RUG contributing organizations. It is contemplated that the LOST-led operation could partner with the Arizona Community Foundation or similar organization.

While the RUG recognizes that proposed mineral exploration by Bronco Creek Exploration in this exact location is not part of this EIS, we continue to have grave concerns about its potential effects on the RUG trail plan. Since the proposed RUG trail system is being offered as an environmental offset to the Resolution Copper Project, owners BHP and Rio Tinto must be required to certify that it will remain so. The property on which the RUG trail system is located must either be bonded for full value against mineral exploration involving drilling or other disruption and mineral exploitation, or the mineral rights must be signed over to the Town of Superior. This is a requirement given that the integrity of this environmental offset is under question due to mining exploration proposals.

Members of the RUG are most grateful for the support of Resolution Copper Mining in crafting this plan and in offering it as a mitigation measure for the loss of recreational resources inherent in mine development. We urge you to adopt it as an integral part of the project in your Record of Decision. The RUG also believes that some of our member organizations will be submitting separate comments about other mitigation that should be considered.

Sincerely,

Superior Recreation User Group

Mila Besich Legends of Superior Trail & Town of Superior

John Bricker Tonto Recreation Alliance

Elizabeth Butler regional equestrians

Erik Filsinger Queen Creek Coalition

Fred Gaudet Arizona Trail Association

Kevin Patterson Tonto Recreation Alliance

Todd Pryor Town of Superior

Jim Schenck Community Working Group & Rebuild Superior Inc.

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