



James S. Schenck
Legends of Superior Trails
PO Box 284
Superior, AZ 85173
jim@magmadorada.com

February 11, 2021

Reviewing Official, Regional Forester
333 Broadway Blvd SE
Albuquerque, NM, 87102
objections-southwestern-regional-office@usda.gov

RE: **LOST** – Legends of Superior Trails **FEIS** Response

Dear Reviewing Officer, Regional Forester

On February 3, 2019, Legends of Superior Trails (**LOST**) endorsed the Recreational Users Group (**RUG**) Multi-Use Plan for the Superior area as a Mitigation for the Resolution Project in a letter to Neil Bosworth, Supervisor, Tonto National Forest. **LOST** and **RUG** as a multi-stakeholder group worked over several years on this plan with input from the US Forest Service.

We disagree with the mitigation proposed in the **FEIS** given it curtails the proposed non-motorized trails in the RUG Multi-Use Plan and is an insufficient offset for the Oak Flats area. The **RUG** proposal, according to "A Mitigation Effectiveness Evaluation of the Superior, Arizona Recreation Project Conceptual Plan reviewed and revised by Mary Rasmussen, **NEPA** Project Manager, Tonto National Forest, contains 18.778 miles of non-motorized trail (page 11). The **FEIS** reduces this to 11.255 miles (page 17). We are disappointed we did not have the opportunity to engage with the US Forest Service prior to the preparation of this document several months ago to discuss its methodology and findings.

We disagree with the characterization of the dropped trails in the review and request that they be reinstated before the final Record of Decision. If perchance, there are trails that have been dropped due to cultural preservation, we request that others be substituted to reach the mileage submitted.

Please find attached the **LOST** letter supporting the **RUG** Multi-Use Plan (February 3, 2019) and the comment letter by **LOST** on the Draft Environmental Impact Statement (**DEIS**) for the for the Resolution Copper Project (October 25, 2019).

We value and thank you for the strong support **LOST** has received from the US Forest Service and, specifically, the Tonto National Forest.

Best Regards,

A handwritten signature in black ink that reads "James S. Schenck".

James S Schenck
LOST Vice President

This letter was approved by the Legends of Superior Board of Directors on February 11, 2021. Vice President Schenck signs on behalf of the entire board.



Legends of Superior Trails
PO Box 284
Superior, AZ 85173

February 3, 2019

Mr. Neil Bosworth, Supervisor
Tonto National Forest
2324 E. McDowell Rd.
Phoenix, Arizona 85006

RE: Endorsement of the Legends of Superior Trails (**LOST**) for the Recreational Users Group (**RUG**)
Multi-Use Trail Plan for Superior Area as Mitigation for the Resolution Copper Project

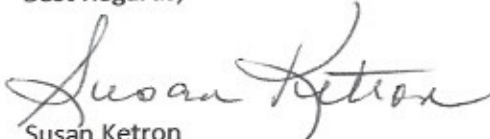
Dear Mr. Bosworth,

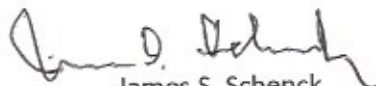
The Legends of Superior Trails (**LOST**) promotes conservation and outdoor recreation in the area surrounding Superior, Arizona which benefits town residents, other Copper Corridor residents and a vast population from metropolitan Phoenix. We thank the **USFS** Tonto National Forest for its excellent support in helping to replace the **LOST** trail that connects Superior as a gateway community to the Arizona Trail. The [LOST Facebook Page video](#) on the **LOST** trail nearing completion in Arnett Canyon has been shared 75 times and has reached over 6,300 people.

LOST has worked diligently over the past few years as a member of the Recreational Users Group (**RUG**) to design a multi-use trail plan that will meet the growing demand for outdoor recreation in the Tonto National Forest near Superior. In addition to the quality of life benefits this plan offers both residents and visitors, it fits into the Town of Superior, and Rebuild Superior's strategy to position Superior as a world-class outdoor recreation destination as part of a diversified and sustainable local economy. Implementation of this plan will help in conservation efforts by supporting designated trail use and will combat the "social trail" damage.

Please consider the **RUG** trail plan proposal as a mitigation in the **EIS** for the Resolution Copper project. The **LOST** has benefited greatly from **USFS** support and coordination. We are anxious to continue to work as stewards in this part of the Tonto National Forest. Please contact Jim Schenck, as the **LOST** representative with the Recreational Users Group (**RUG**) at 661-645-1864 or jim@magmadorada.com if you have any questions.

Best Regards,


Susan Ketron
LOST Treasurer


James S. Schenck
LOST Board Member



Legends of Superior Trails
PO Box 284
Superior, AZ 85173

October 25, 2019

Mr. Neil Bosworth, Supervisor
Tonto National Forest
2324 E. McDowell Rd.
Phoenix, Arizona 85006

RE: Comment letter by the Legends of Superior Trails (**LOST**) on the Draft Environmental Impact Statement (**DEIS**) for the Resolution Copper Project

Dear Mr. Bosworth,

The Legends of Superior Trails (**LOST**) promotes conservation and outdoor recreation in the area surrounding Superior, Arizona which benefits town residents, other Copper Corridor residents and a vast population from metropolitan Phoenix. Legends of Superior Trails' mission is to provide sustainable outdoor recreation opportunities in the Tonto National Forest that surrounds the Town of Superior as well as the Town itself for both residents and visitors. The initial **LOST** trail made Superior the first Gateway community with a connector trail to the Arizona National Scenic Trail which crosses the state from Mexico to Utah.

LOST's impact is profound given that Superior is working towards economic sustainability through diversification by developing Superior into one of Arizona's prime recreational destinations. **LOST's** current and projected trails are part of a strategy to improve the local quality of life, the desirability to live in Superior and its attractiveness to outdoor tourism. **LOST** has been a 501c3 non-profit organization, recognized by the **IRS** since 2015.

LOST supports the Resolution Copper Project and believes that it will have a positive impact for Superior and the surrounding area as long as the necessary mitigations are part of the Record of Decision.

LOST has been an active member of the Recreational Users Group (**RUG**), our mission has been to design a multi-use trail plan that will help meet the growing demand for outdoor recreation in the Tonto National Forest near Superior. In addition to the quality of life benefits this plan offers both residents and visitors, it fits into the Town of Superior's strategy to position Superior as a world-class outdoor recreation destination as part of a diversified and sustainable local economy. Implementation of this plan will help in conservation efforts by supporting designated trail use and will combat the "social trail" damage. The **RUG** trail plan is a proposed mitigation in the **EIS** for the Resolution Copper project.

The USFS should incorporate the **RUG** plan, as presented in Attachment 1 of Appendix J, in its entirety into the Record of Decision as a partial required mitigation for the combined recreational impacts of the Resolution Copper Project. The endowment should be managed by a local nonprofit organization led by the Legends of Superior Trails (**LOST**) with significant board participation by other **RUG** contributing organizations. It is contemplated that the **LOST** led operation would partner with the Arizona Community Foundation or similar organization.

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 as valued as an environmental offset. 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.

LOST fully supports the Superior Waters and Trails proposal contained within the Town of Superior **DEIS** comment letter. **LOST** has been, and continues to be, an active member of the Superior Waters and Trails committee. In part, Superior Waters and Trails will unite the **LOST** Queen Creek segment with the Highway 60 park, the **LOST** Arnett Canyon segment linking the Town of Superior to the Picket Post trailhead. This is an integral part of Superior's becoming a recreational destination and will help address the socioeconomic disequilibrium detected that the Resolution Project will cause for Superior and outdoor enthusiasts from all parts.

Resolution Copper needs to certify in the Record of Decision that it will allow recreational access to the Queen Creek Canyon segment of the **LOST** trail (old Highway 60) including the historic Queen Creek tunnel in perpetuity.

LOST requests that Resolution Copper fully fund the development of the Castleberry Ranch into a full-service campground as a mitigation for the loss of camping at Oak Flats. Ongoing maintenance for this should be funded by the endowment created to care for the **RUG** plan.

We request that Resolution Copper either fund directly or through the **RUG** endowment, the extension of the **LOST** Queen Creek segment south across the base of Apache Leap. This was an initial proposal by the **RUG** but was dropped on the recommendation of Resolution Copper since the original trail, in the area governed by the Apache Leap Management Area, is thought to entail legal challenges. The process to build this trail should begin after the initial **RUG** trail system is finished.

LOST agrees with the **USFS** preferred tailings site as Skunk Camp and believes that it provides the least damage to recreational activities. **LOST** also agrees with the **USFS** choice of a northern route for the Skunk Camp pipeline as the southern route would negatively impact the **RUG** trail system and other recreational opportunities south and southeast of Superior. All efforts possible must be taken to assure that the northern pipeline design and construction does not negatively impact Devil's Canyon. **LOST** requests that Resolution Copper include in its plans for the pipeline and option to later include a parallel trail.

Mitigation for Forest Road 315 must include a re-route that will allow 4x4 traffic to the east of the mine site near Devil's Canyon and which links up with the 315-route south of the mine site.

Thank you very much for your consideration of our comments. We believe that Superior and Resolution can mutually benefit from this project as long as the **USFS** and Resolution Copper are cognizant of the possible negative impacts and plan ahead to mitigate them. We are anxious to continue to work as stewards in this part of the Tonto National Forest. Please contact Jim Schenck, Vice President of the **LOST** at 661-645-1864 or jim@magmadorada.com if you have any questions.

Best Regards,



James S. Schenck

LOST

Vice President

This letter was approved by the Legends of Superior Board of Directors on November 7, 2019. Vice President Schenck signs on behalf of the entire board.