

February 26, 2021

Reviewing Official

Regional Forester

Via email at:

objections-southwestern-regional-office@usda.gov

RE: Superior Recreation User Group Objection
Draft Record of Decision (DROC) and Final Environmental Impact Statement (FEIS) for
the Resolution Copper Project & Land Exchange

References:

- 1.) DROC, 4.8 Recreation, Page 17, recommended multi-use trail plan
- 2.) FEIS Vol. 4, Appendix J, Page J-27, FS-RC-03: Mitigation for adverse impacts to recreational trails (Forest multi-use trail plan)
3. *A Mitigation Effectiveness Evaluation of the Superior, Arizona Recreation Project Conceptual Plan* (March 2019), Ryan Rausch and Mary Rasmussen, Process Memorandum to File - Final

Dear Acting Regional Forester Watts,

The Superior Recreation User Group (RUG) submitted formal comments on the Draft Environmental Impact Statement (DEIS) for the Resolution Copper Project & Land Exchange on November 5, 2019, and so have standing to offer this objection to the Draft Record of Decision for the project. Additionally, new information has arisen since that time that has significantly affected our area of interest, a proposed multi-use trail plan developed by this group and offered in the DEIS as partial mitigation for recreational impacts of the copper mining project.

Our objection is based on the fact that the proposed multi-use trail plan has changed almost beyond recognition between the DEIS and the FEIS, from a 69-mile-long integrated system of motorized (43.4 miles) and nonmotorized (25.6 miles) trails to a 20.5-mile system including about 11 miles of nonmotorized trails and 9 miles of motorized trails.

This drastic reduction in recreational and economic development potential for the Superior area was achieved through application of Forest Service management direction not made available to the RUG as we were developing our proposal, including the 2019 Draft Forest Plan, the 2019 DROC for Travel Management on the Tonto National Forest (TNF), and the Globe Ranger District Recreational Opportunity Spectrum (1985). Further, assumptions have been made about trail constructability and appropriateness as offsetting mitigation that we do not believe to be true. The huge modification of our collaborative plan makes us feel that thousands of volunteer person-hours and thousands of dollars in professional support now appear to have been wasted in this multi-year effort.

Our objection is, therefore, twofold.

Procedural Objection

This RUG group has existed since September 2015 with the primary purpose of developing, promoting, and ultimately implementing an outdoor recreation network designed to enhance the experiences of a wide range of users that will, ultimately, support economic development in the Superior/Copper Triangle region. The group was established at the request of the Tonto National Forest (TNF) to bring varied recreation users together in a common effort to accommodate multiple uses, rather than each user group proposing separate plans. The RUG has worked for more than 5 years to strike a reasonable balance among types of trail users including hikers, mountain bicyclists, equestrians, OHV users, single-track motorcycle users, and campers.

It is important to note that the RUG plan was developed as a stand-alone product BEFORE the Draft EIS was completed and was intended by this group to offer ADDITIONAL recreation opportunities to the region. It was only after our plan was completed that the decision to include it as mitigation for the Resolution Copper Project was made. The group agreed with this approach because it seemed to offer a streamlined review and could, appropriately, be considered mitigation for project recreation trail losses to some extent. We are concerned that the greater, overriding objective of the plan to INCREASE regional recreational opportunities has been lost in the narrowness of the Forest Service review and reduction of this plan to the proposed configuration, presumably ONLY as project direct offset mitigations.

We believe that our plan, as presented in the Draft EIS, represents a trail system that serves everyone while providing required mitigation from mining efforts.

Globe Ranger District staff have supported and advised the RUG from the beginning and have attended nearly every meeting of the group. They were involved in development of the plan, the strategy for submitting the agreed-upon plan as mitigation in the DEIS, and discussions about how to implement what was ultimately decided by the Forest Service. At many of these meetings since the DEIS was released the group inquired about how the TNF was reviewing the RUG plan and what progress had been made to that end. No one, including our Globe staff, was able to answer that question. It is apparent to us that neither the RUG members nor the Ranger District staff nor our Resolution Copper Company representatives were ever included in or made aware of this review process, which apparently took place at other levels of the Forest Service. Our confusion and misunderstandings may be, then, attributable to poor internal Forest Service communication and collaboration.

In reviewing the relevant documents, we find that the Forest Service has applied several screens to the original RUG plan that have rendered five years of collaboration among our members virtually useless. While we understand that management objectives do change, the Travel Management Plan and the revisions to the Forest Plan have been under study for years, and their provisions could and should have been discussed with the RUG to help reduce conflicts and enhance the plan's feasibility.

Most particularly, we object to the widespread application of the Recreation Opportunity Spectrum (ROS) to remove and re-classify many of the route segments included in our original plan. This ROS has, presumably, been in place for many years, if not decades, and could easily have been provided to the RUG even before our deliberations began. Instead, it has been used as a final screen for the suitability of routes and is, in fact, almost antithetical to the concepts we developed for placement of motorized and nonmotorized trails. Further, we believe it's entirely likely this ROS is outdated and inaccurate given the amount of urban and recreational development – planned and wildcat – that has occurred in the Superior area in recent years.

Technical Objection

Table 2 Evaluation Summary of RUG Trail Plan, included in the Rausch/Rasmussen report cited above, outlines the criteria used to screen each of the proposed RUG route segments. We take issue with these screening criteria, as described here.

1. Most of our proposed routes (all nonmotorized and quite a few motorized) are considered not “practicable”, which is defined as “able to be constructed and maintained, and has no logistical concerns”. We know that this is not true since all routes proposed by the RUG were field-verified both by user groups and by trail design and construction experts WestLand Resources and Southwest Trail Solutions. Further, all routes have been evaluated for cultural resource concerns.
2. Most of what we have considered our highest-value non-motorized trails (characterized as segments 107-110) have been removed due to the current Travel Management Plan's listing of NFSR 1039 as administrative use only and a determination that this negates access to these routes. First, this trail system was specifically designed to accommodate world-class mountain biking adventures, which other trails in this region do not. Second, it seems likely that small routing and design changes would be able to provide alternative access to these trails from other existing roads. (We note that the entire RUG endeavor was initially spurred by proposals from the International Mountain Bicycling Association, and we have sought to accommodate a tiny portion of their desired routes in our multi-use plan.) Alternatively, we recommend that the Forest Service consider changing the designation of NFSR 1039 from Administrative to Open (which is its designation in the new Travel Management Plan); this would eliminate many of the concerns outlined here.
3. Segments 103-106 of the non-motorized trail network were dropped for reasons that we do not understand based on the descriptions provided in Table 2.
4. As a result of the above assessments, the ONLY non-motorized trail from the RUG proposed 25.6 miles that remains in the Forest Service plan is our segment 103, the 2.9-mile-long Telegraph Trail. Ironically, this and many adjacent routes occur in the SPM ROS classification.
5. Related to this, our proposed motorized Wood Canyon trail has been reclassified as non-motorized. We agree that the portion of this trail, south of NFSR 1039, should be non-

motorized to better accommodate equestrian users. However, approximately 3.3 miles of the “non-motorized Wood Canyon Trail” are actually an Administrative Road. An Administrative Road is not a non-motorized trail. The 3.3 miles should be removed from the non-motorized total. Further, the designation of this road as Administrative was used in other analyses (see points 2. and 7.) to eliminate many other route segments.

6. The majority of the RUG’s proposed motorized trails (segments 201-205) have been dropped due to the ROS designation of SPNM. The Forest Service recommendation that disqualifies almost all of the RUG plan’s motorized trails is using an ROS that dates from the 1985 Forest Plan and so is significantly outdated. Much has changed in the last 35 years since these were developed. Motorized recreation has grown tremendously as have most types of recreation on public lands. The RUG understands that, if using the ROS screening factor, the TNF must use the latest, even if outdated, ROS data. However, given that TNF leadership has discretion about how to apply the ROS for different situations and that Travel Management and the Forest Plan Revision are already considering changes to the ROS based on current realities, we request that motorized trails included in the RUG plan not be rejected based on the ROS.

7. The other proposed motorized trails (segments 206, 207, 209, 210) have been dropped because of the administrative closure of NRSR 1039. Again, we believe that alternative access to most of these routes could be provided with slight adjustments in the plan or designating NRSR 1039 as Open.

8. Regarding the recommendation in section 3.1.3 Travel Management Topics, the Rausch/Rasmussen report states that all motorized single-track routes are converted to trails that also accommodate ATVs and UTVs. We strongly object to this recommendation. The FSEIS of the Tonto Travel Management process is anticipated to approve 109 miles of motorcycle single track trails out of the approximately 3700 total miles of motorized roads and trails available for OHV use. Discussions with the TNF through the travel management process and specific language in the draft Travel Management and Draft Forest plans identify the shortage of motorized single-track trails for off-road motorcycles as a significant deficiency in the Forest’s OHV planning. There is general agreement that, given the large population who engage in off-road motorcycle recreation and the activity’s ongoing explosive growth, the mileage of motorcycle single track should be increased over time. This was one of the driving factors for adding this type of trail as part of the RUG proposal. There are thousands of miles of OHV useable roads and trails in the TNF that accommodate ATV and UTV style vehicle travel. We specifically request that the motorized single track in the RUG plan be left as such.

9. After analysis, the only remaining motorized routes all occur in a confined area close to urban development. This completely eliminates our objective of providing longer defined routes for OHV and motorcycle enthusiasts that are limited in other nearby areas. In conclusion, the Forest Service plan does not provide any new or additional opportunities for motorized recreation.

10. Trail segments not included in the RUG plan have been included in the Forest Service plan, further reducing overall mileage. These are the FR 4 reroute and the Inconceivables access road.

11. Last, we request an explanation of the term “effective”, as used to evaluate route segments. This criterion is defined as “proposed route offsets an impact to recreational resources of NFS Roads caused by the Resolution Copper Project and Land Exchange”. We do not understand the meaning of this or how it can be applied to individual route segments.

Thank you for consideration of our comments. We hope to be able to discuss these further with TNF staff before the Record of Decision is issued.

Sincerely,

THE SUPERIOR RECREATION USER GROUP

Members include/have included:

Arizona Trail Association (ATA)
Arizona Wilderness Coalition
Boyce Thompson Arboretum
Climbing Association of Southern Arizona
Equestrians
Friends of the Tonto National Forest
Gold Canyon Community
International Mountain Bicycling Association (IMBA)
Legends of Superior Trail (LOST)
Mountainbrook Village Hiking Club
Queen Creek Coalition (QCC)
Sun City Anthem Hiking Club
Superior Chamber of Commerce
Superstition Area Land Trust (SALT)
Tonto Recreation Alliance (TRAL)
Town of Superior

With support from:

Resolution Copper Company
WestLand Resources
Southwest Trail Solutions
Globe Ranger District, Tonto National Forest

cc: neil.bosworth@usda.gov
tom.torres@usda.gov
mary.rasmussen@usda.gov
adam.bromley@usda.gov
sheryl.cormack@usda.gov