

Climbing in Color
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Arizona Queer Climbing Collective
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July 21, 2025

Ericka Luna
Deputy Forest Supervisor
Tonto National Forest
2324 E McDowell Rd
Phoenix, AZ 85006

Re: Final Environmental Impact Statement: Resolution Copper Project & Land Exchange

Dear Deputy Forest Supervisor Luna:

This is a joint letter by Climbing in Color and Arizona Queer Climbing Collective as a public comment to the Final Environmental Impact Statement for the Resolution Copper Project & Land Exchange submitted within the 30-day deadline.

Climbing in Color (CIC) is a 501(c)(3) nonprofit rock climbing group based in Tucson, Arizona. CIC's community encompasses not only Arizona, but also extends beyond our state borders. CIC was founded in 2019, and its mission is to "elevate the voices of climbers of color and build a community of camaraderie and support." Annually, we have an outreach of approximately 500 participants who participate in-person in our monthly events.

Arizona Queer Climbing Collective (AZQCC) was founded in 2019 with a mission to "unite and empower the LGBTQ+ community through climbing and outdoor activities." Since its inception, AZQCC has seen a tremendous response hosting various events and climbing meetups. Countless participants have become not only avid climbers, but also stewards of the land.

In writing this letter, CIC and AZQCC recognize that the state of Arizona occupies the land of 22 sovereign nations whose ancestors have lived on this land for time immemorial, including the impacted indigenous people and tribes - the Western Apache (including the San Carlos Apache Tribe), the Yavapai, the O'odham, and the Puebloan Tribes of Hopi and Zuni.

For many members of the LGBTQ+ and Black, Indigenous, and People of Color (BIPOC) community, climbing provides an opportunity to connect to outdoor spaces in a way that is markedly different from any other recreational activity. It's not just about the physical connection or exertion. Many of us find a spiritual connection, healing spaces, and inspiration when we climb in these spaces. At the same time, we find community.

CIC and AZQCC write in opposition to the development of a copper mine in Oak Flat, Chích'il Biił Dagoteel, and surrounding areas because of the complete loss of land holy and sacred to the impacted indigenous people and tribes, loss of world-class rock climbing crags, negative



impacts to groundwater and surface water, negative impacts to the overall ecosystems dependent on precious water resources, and loss of significant cultural resources. All of these monstrosly negative effects are already outlined in the draft EIS Environmental Impact Statement (EIS) and this Final EIS (FEIS). CIC and AZQCC understand that residents of nearby towns and cities welcome the economic benefits touted by Resolution Copper, but CIC and AZQCC remain firm that the economic benefits of the mine do not outweigh the catastrophic impacts of a mine that is expected to last at most only 46 years, will result in a crater in Oak Flat that will be 800 and 1,115 feet deep and roughly 1.8 miles across, a tailings storage area of 3,300 acres (with a total of 4,900 acres fenced from the public), and external water use of 180,000 to 590,000 acre-feet.

Covered in the FEIS is the land subject to the 2014 Section 3003 of PL 113-291, which exchanges the precious 2,422-acre Oak Flat Federal Parcel to Resolution Copper for land owned by Resolution Copper. This land contains an area known as Oak Flat, an area sacred and holy to the Apache people and other Indigenous people.

In addition, the Oak Flat area is a world-class rock climbing and recreational area. For climbers, there is a deep connection to something special when we climb here. Oak Flat is a place where the past, present, and future converge. This is a historically significant climbing area in Arizona, and where the first outdoor climbing competitions were held in America; the Phoenix Bouldering Competition brought legends like Lynn Hill, Tommy Caldwell, and Chris Sharma to Oak Flat to the climbing stage to compete against each other on bouldering problems.

A 2017 study by consultants Parsons Brinckerhoff, revealed that 1,114 boulders—more than 97% of the boulders in the greater Queen Creek area—as well as 149 sport routes and 38 trad routes will be affected by permanent closures in three crags – Euro Dog Valley, The Mine, and Oak Flat. The proposed action and all alternatives, including Alternative Six, fail to address these impacts fully; furthermore, any private land exchanged for Oak Flat will not replace or remediate the loss of these truly unique and special climbing and bouldering crags. The proposed action and all alternatives mean that these climbing areas will be nothing more than a memory.

For these reasons, CIC and AZQCC strongly urge the Forest Supervisor, Tonto National Forest to disapprove the proposed action, deny Resolution Copper's General Plan of Operations (GPO), disapprove a special use permit for the Salt River Project to authorize construction and operation of power lines on NFS lands, and disapprove any special use permit needed to authorize construction and operation of pipelines on NFS lands. The no action alternative is the best path forward.

With respect to the land exchange, Section 3003 of PL 113-291, CIC and AZQCC understand that the Forest Supervisor, Tonto National Forest has limited discretion. However, CIC and AZQCC resolutely urge that the Forest Supervisor, Tonto National Forest not only address, but

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also heed the very serious concerns of affected Tribes, which were raised during the draft EIS public comment period and scoping during the Tribal consultation process. These concerns likely will be raised during the comment periods for the FEIS and the draft Record of Decision (ROD). Their voices should not be ignored.

Pursuant to Section 3003(c)(3), the Secretary of Agriculture is required to minimize the adverse effects on the affected tribes resulting from mining and related activities on the Federal land conveyed to Resolution Copper. This FEIS fails to demonstrate that the adverse effects on the affected tribes resulting from the proposed mining activity will be minimized. In fact, the FEIS's proposed action describes the negative impacts to tribal values and concerns and the absolute and total loss of the Oak Flat area, holy and sacred to the Western Apache and other Indigenous Tribes; yet, the draft ROD still approves the action, specifically Alternative Six, despite the "significant environmental and social impacts." These losses include, but are not limited to the following: permanent inability to practice ceremonies in their Holy site and permanent loss of critical cultural resources.

With accessibility, historically and today, being one of the biggest barriers facing marginalized communities, the closure of a sacred and treasured place such as Oak Flat will only serve to damage both the environment and multiple communities. We ask that you please consider all of those negatively impacted.

Thank you for the opportunity to provide a comment. CIC and AZQCC hope that the Forest Supervisor not only will review, but also will consider and address the concerns and objections raised by this letter.

Sincerely,

Board of Directors
Climbing in Color

Leadership
Arizona Queer Climbing Collective