



July 30, 2021

U.S. Forest Service, Coronado National Forest
Ms. Sarah Elizabeth Martinez, Geologist
c/o James Copeland, District Ranger, Nogales Ranger District
300 W. Congress Street, 6th Floor
Tucson, AZ 85701

Electronically submitted to:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=55521>

RE: Draft Environmental Assessment for Santa Rita Quarry-IMERYs Project #55521

Dear Ms. Martinez:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the Santa Rita Quarry-IMERYs Exploration Drilling Project Draft Environmental Assessment (EA) and Plan of Operations (PO). The Department understands that the project is a mineral exploration investigation drilling program. The project includes proposed drilling and expansion of the previously disturbed North Pit of the Santa Rita Quarry. The North Pit is situated on the Coronado National Forest (CNF) at the northern end of the crest of a north-south trending ridge. This existing pit is a side-hill excavation covering a footprint of approximately 15.7 acres, including internal and perimeter haul roads. The North Pit has been mined since the 1960s.

The Department also understands that the drilling program is planned for three phases to determine the extent of the resources present. The later phases of the program would be dependent upon the results of prior phases, and would only be conducted if results indicate a need for additional information. If all three phases of the drilling are completed, the total additional new disturbance area would be 1.31 acres. Contingent on results obtained from drilling, an expansion of the current North Pit may also be proposed, and based on the conceptual design for the North Pit Extension, the excavated area would have a footprint of approximately 10.1 acres. New haul roads would be constructed within the footprints of the North Pit Extension and South Pit Extension, without requiring additional surface disturbance of CNF lands. The maximum total new disturbance areas for the mining activities would be 21.4 acres.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities to protect and conserve the state fish and wildlife resources. In addition, the Department manages Threatened and Endangered species through authorities of Section 6 of the Endangered Species Act and the Department's 10(a)1(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for

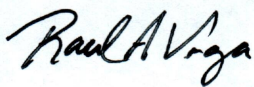
safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

As a regular component of the Department's project evaluation, the Santa Rita Quarry-IMERYYS Exploration Drilling Project was submitted to the Department's publicly available online Environmental Review Tool (ERT). The attached ERT report is an informational resource that aids in evaluating potential environmental impacts in the project area.

The Department's review of the project area identified a Golden Eagle nesting territory within the project area. The Bald and Golden Eagle Protection Act (BGEPA) provides protections for bald and golden eagles. The Department recommends coordinating with the Region 2 Migratory Bird Office of the U.S. Fish and Wildlife Service to discuss compliance with the BGEPA. The Department is available to assist with this coordination and provide more specific data regarding this eagle nesting territory. Tuk Jacobson is the Department's raptor expert and is available to share information on best management practices; he can be contacted at kjacobson@azgfd.gov or 623-236-7575. As presented in the DEA, the majority of other sensitive species of potential occurrence in and around the project area would not be expected to occur due to the history of mining activities on site.

Thank you for the opportunity to provide input on the draft EA for the Santa Rita Quarry-IMERYYS Amended Plan of Operations and Proposed Expansion. The Department looks forward to continued involvement with the project and coordination with the project team. For further coordination, please contact John Windes at jwindes@azgfd.gov or 520-628-5376.

Sincerely,



Raul Vega
Regional Supervisor, Tucson

Attachment: ERT Report: Santa Rita Quarry-IMERYYS Amended PO and Proposed Expansion

cc: Luke Thompson, Habitat Evaluation and Lands Branch Chief
John Windes, Region V Habitat Program Manager
Ginger Ritter, Project Evaluation Program Supervisor
Brian Aragon, District Wildlife Manager
Kerwin Dewberry, Coronado National Forest Supervisor, USDA Forest Service
Julie McIntyre, USFWS Ecological Services
Kirsten McDonnell, USFWS Region 2, Migratory Birds, Eagle Biologist

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