



January 13, 2022

Emily Reynolds, NEPA Planner  
U.S. Forest Service  
Coronado National Forest  
300 W. Congress Street  
Tucson, AZ 85701

**ATTN: Forestwide Material Source Sites**

*transmitted electronically*

Dear Ms. Reynolds:

Thank you for the opportunity to comment on the draft environmental assessment (EA) for the Forestwide Material Source Sites project. This draft EA proposes 17 material source sites (i.e., pits and quarries) spread across the Douglas, Nogales, Safford, Santa Catalina, and Sierra Vista Ranger Districts on the CNF.

The attached comments focus primarily on the proposed material source site located in the Santa Catalina Ranger District of the Coronado National Forest that is located along the Control Road (Control Road pit). Pima County owns protected conservation lands adjacent to this site that are potential mitigation lands that may be used to satisfy the terms of the County's Section 10(a)(1)(B) Endangered Species Incidental Take permit issued by the U.S. Fish and Wildlife Service. It is critical that the location and operation of such a materials source pit does not result in any diminishment of the conservation values of the County's conservation lands located in the same area for which the County has invested resources in acquiring and managing. Additionally, we provide comments on the proposed siting of the Government Tank materials pit north of Redington Road (Santa Catalina Ranger District) in the context of minimizing impacts to the lowland leopard frog (a species covered by the County's Section 10 permit). In general, Pima County applauds the thorough range of measures presented in this draft EA that are directed towards minimizing natural resources impacts.

Please see comments below. Thank you for the consideration.

Sincerely,

*Linda Mayro*

Linda Mayro  
Director

**ATTACHMENT**

**Pima County Comments re: Control Road and Government Tank Material Source Pits**

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**Proposed Control Road pit – Santa Catalina Ranger District**

Two of the proposed material source sites are on the Santa Catalina Ranger District. The proposed Control Road pit (Township 11 S, Range 16 E, Section 16) is located adjacent to Pima County fee lands protected by Restrictive Covenants meant to address ensuring that the biological and other intrinsic values of the lands are not diminished. Indeed, portions of these County-owned lands occur in the same section as the proposed materials source site, and the Control Road, as well as Forest Road 4450 pass through County-owned lands downhill of where the proposed site is. These lands are among the potential mitigation lands that Pima County holds and manages as part of its Multi-species Conservation Plan (MSCP) an integral component of the County's ongoing compliance with its Section 10 Incidental Take permit issued by the U.S. Fish and Wildlife Service.

Pima County understands the benefits of sourcing materials for roadway and other improvements closer to where they are to be used, as well as the benefits of enhanced and safe public access that improved roadways confer. However, Pima County wants to ensure that its investment in and management of its protected potential mitigation lands does not become diminished by the proposed pit location. For example, areas of associated disturbed ground (up to 1.5 acres per year) could facilitate the faster spread or invasion into the area of nonnative, invasive grass species, such as Lehmann's lovegrass, weeping lovegrass, or Rose natal grass (all of which do occur in the general area). The draft EA addresses various resource protection measures meant to minimize the spread of invasive species in disturbed areas, as well as monitoring and possible treatment of the sites for any invasive plants that become established. Pima County agrees with these measures and emphasizes their importance, and goes even further to suggest that the proposed monitoring /treatment of invasive weeds for three years post project implementation should be considered a minimum. Monitoring and treating invasives beyond this time period, even up to five years post implementation should be considered due to the difficulties of detecting new invasions or populations, and the ability of invasive plants to rapidly expand from relatively low densities when conditions are ideal. Subsequent to the site being closed and revegetated Pima County emphasizes the importance of continuing to monitor and to treat where necessary, the recovering vegetation for at least three to five years.

Pima County commends the resource protection measure meant to address relocation of any lowland leopard frogs and egg masses (or tadpoles) that are at the Control Road pit site. There are three different dirt tanks along the Control Road in this area that are sometimes occupied by lowland leopard frogs. In the event that any of these sites are to be impacted, Pima County is willing to coordinate and discuss with AGFD and the CNF relocation of individuals to possible sites on County lands, should any prospective sites be identified. Detection of this species at a site is not always easy, and surveys meant to identify presence of the species should keep this in mind, particularly if the tadpole life stage is the principle life stage occupy a site.

The draft EA indicates that gating will be used to ensure that inappropriate uses such as dumping and shooting do not occur when sites are not in active use. Periods of non-use could potentially be fairly long, which increases the chances of illegal uses and actions occurring. Pima County would like to emphasize the importance of effectively securing any pit site to minimize these

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occurrences, as well as periodically patrolling/monitoring sites when not in use, such as by Forest law enforcement. For example, inappropriate uses such as target shooting could be a cause for subsequent forest fires and pose a threat to other users of the Forest. Pima County also requests that any gate and/or fence posts be appropriately covered or capped to prevent mortality of cavity-dwelling birds or other species that may become stuck within.

**Proposed Redington Road (Government Tank) pit – Santa Catalina Ranger District**

Pima County applauds the Forest's decision to drop the originally proposed site along Redington Road (Township 13 S, Range 17 E, Section 22 and 26) in favor of the site at Government Tank (Township 13 S, Range 17 E, Section 4). This proposed site also includes 0.04 new miles of access road from Redington Road. Pima County also acknowledges the benefit of having a materials site along Redington Road, in the context of road maintenance and access. The County's Multi-Species Conservation Plan (MSCP) and associated Section 10 Incidental Take Permit issued by the U.S. Fish and Wildlife Service covers a number of species, including the lowland leopard frog. Lowland leopard frogs may occur in the dirt tanks along the Tanque Verde Creek drainage, as well as occurring in Tanque Verde Creek itself, with lowland leopard frogs most recently document there in fall of 2021. Lowland leopard frogs could potentially occur in Government Tank, and at one point it was assessed as a tank that was likely permanent. Given this, protective measures indicated for the Control Road pit location meant to address relocation of any individuals of this species should also be applied to the Government Tank pit location. Pima County agrees with the stated measures that include restricting vehicular access to the site at this location during periods of non-use by gating. Given the heavy recreational use of the Redington Road area, it will be critical to prevent establishment of an illegal target shooting area at any site when it is not in use, due to the high risk of this kind of activity causing forest fires, as well as the danger this action may pose to other utilizing the area.