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First name: Kristin
Last name: Terpening
Organization: AZ Game and Fish Department
Title: Region V Habitat Specialist
Comments: October 17, 2016Coronado National ForestATTN: Minerals & Geology Staff/Rick Goshen300 W Congress St. 6th FloorTucson, AZ 85701Re: Hermosa-Taylor Deposit Drilling ProjectDear Mr. Goshen:The Arizona Game and Fish Department (Department) received the Coronado National Forest(Forest) scoping notice regarding a proposed Plan of Operations (Plan) for the Hermosa-TaylorDeposit Drilling Project (Project), submitted by Arizona Minerals, Inc. (AMI) to develop eightexploratory drill holes at three drill sites (pads), impacting 0.92 acres on Forest lands in thePatagonia Mountains. In addition, two temporary access roads of 0.07 miles and 0.25 miles inlength would impact an additional 0.62 acres of Forest lands. We understand that the Forest isconsidering preparing an environmental assessment for AMI[rsquo]s proposed plan, and therefore offerour assistance and expertise in developing mitigation through the National Environmental PolicyAct (NEPA) process.Attached is a report from our Online Environmental Review Tool available athttps://azhgis2.esri.com. This tool provides a special status species list for Phase 1Environmental Compliance and NEPA documents, and provides information and guideline linksfor incorporating wildlife conservation into project planning. This information can be used toguide preliminary decisions and assessments of proposed land and water development,management, and conservation projects. The report provides a list of special status species andspecial areas documented within a three-mile buffer of the project site. We request the Forestavoid impacts to the Special Status Species known to occur within 3 miles of the proposed drillsites, and to Arizona[rsquo]s Species of Greatest Conservation Need (SGCN) and of Economic andRecreation Importance (SERI) which have predicted ranges in the vicinity of the project area.According to the Plan, the Project was expected to commence October 1, 2016. Assuming this isno longer the case, it would be useful for our review to be informed of the revised schedule. Asoriginally planned, the October 1 start date was expected to allow for completion of all treeremoval, road development, drilling, and reclamation activities prior to the June 1 start of thebreeding season for the threatened western yellow-billed cuckoo (Coccyzus americanus). ThePlan could benefit from additional text outlining the procedure for curtailment of project-relatedactivities during seasonal restrictions in the event the Project does not commence early enough toallow completion of all activities prior to the start of the cuckoo breeding season.Drilling activities are expected to be conducted up to 7 days per week for 24 hours per day for aperiod of approximately 5 months. The noise, human presence, and lighting associated with thisactivity would all combine to make the site and the surrounding areas extremely inhospitable towildlife and to a lesser degree, recreationists. The Forest should analyze all such impacts towildlife and recreationists in the NEPA analysis. Any other wildlife-disturbing activitiesoccurring within the project vicinity should also be included in the NEPA analysis in addressingcumulative impacts and/or connected actions.The project should be evaluated with the greater ecosystem in mind, including connected habitatsin the San Rafael Valley and Sonoita Creek, as well as potential impacts from pollution, habitatfragmentation, traffic, and disturbance. Because this area is an important habitat linkage formany species moving between sky islands and to and from Mexico, we urge the Forest toaddress the potential loss of habitat connectivity in the NEPA analysis.As part of the ongoing biological studies and species surveys, please note any roost trees forGould[rsquo]s turkeys. The Department has invested significant resources in restoring the turkeypopulation in the Patagonia Mountains.The Plan estimates Project use of 20,000 gallons of water per week to be obtained from anexisting well on AMI[rsquo]s private land. Although the Plan states this is within the range of wateruse for drilling programs completed by AMI on their private lands over the past eight years andwould purportedly not constitute a substantial change from existing conditions, such water useshould be analyzed during the NEPA process. In particular, this analysis should examine impactsto surrounding water sources that may be connected.The Department is especially concerned with the cumulative impacts of this project, includingimpacts from mining in the event minerals are located. The Forest should address the cumulativeeffects of all current exploration activity in the Patagonia Mountains and nearby sky islands,including what is known about mining activities in Mexico, due to the large home ranges ofsome species and their need to move between mountain ranges.The proponent should mitigate impacts [ldquo]in-kind, in time.[rdquo] The Forest should consider off-sitemitigation. For example: public access lost or impacted should be

offset with new access off-site,for the duration of that impact. Additionally, any residual impacts should be compensated.Thank you for the opportunity to comment on this project. Please contact me directly with anyquestions regarding this letter at kterpening@azgfd.gov, or at 520-388-4447.Sincerely,Kristin TerpeningRegion V Habitat Specialistcc: Jean Calhoun, USFWS Ecological ServicesAttachment: AGFD Environmental Review Tool ReportArizona