



October 9, 2020

Sierra Vista Ranger District
District Ranger, % Rick Goshen
4070 S. Avenida Saracino
Hereford, AZ 85615

Electronically submitted 10/9/2020 at:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=58629>

RE: San Antonio Exploration Drilling

Dear Mr. Goshen:

The Arizona Game and Fish Department (Department) understands the San Antonio Exploration Drilling Project (Project) will conduct mining exploration drilling in a tributary of Washington Gulch in the Patagonia Mountains. This canyon is part of the Santa Cruz River drainage. The proponent, IC Explorations, LLC proposes to drill at up to five sites using a single reverse circulation drill rig. The proposed implementation timeline is 50 days, including 30 days of drilling and concurrent reclamation and 20 days for mobilizing, demobilizing, and final reclamation activities. Operating hours would be during daytime hours between sunrise and sunset.

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 for the management of state fish and wildlife resources. In addition, the Department manages threatened and endangered species through Section 6 authorities 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.

In review of the Plan of Operations (POD) wildlife section, Department personnel noted that the POD states that Sonoran tiger salamanders (*Ambystoma tigrinum stebbensi*) have "No known records occur within or near the Project Area." A review of the Department's Heritage Data Management System indicates records for this species within the Project Area. Therefore, the Department would like to work with the Forest to update the wildlife section and assist in identifying any additional special status species occurrence records and potential habitat near or within the Project Area.

azgfd.gov | 602.942.3000

5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086

GOVERNOR: DOUGLAS A. DUCEY COMMISSIONERS: CHAIRMAN KURT R. DAVIS, PHOENIX | LELAND S. "BILL" BRAKE, ELGIN
JAMES E. GOUGHNOUR, PAYSON | TODD G. GEILER, PRESCOTT | ERIC S. SPARKS, TUCSON DIRECTOR: TY E. GRAY DEPUTY DIRECTOR: TOM P. FINLEY

To further this effort and support the Forest's analysis, the Department has attached a report from the Department's Online Environmental Review Tool (<https://ert.azgfd.gov/>). This tool provides a special status species list for Phase 1 Environmental Compliance and NEPA documents, and provides information and guideline links for incorporating wildlife conservation into project planning. This information can be used to guide preliminary decisions and assessments of proposed land and water development, management, and conservation projects.

The Department would like the opportunity to meet with the Forest and the project proponent to discuss and identify best management practices that would avoid, minimize, and/or mitigate potential disturbances to wildlife and wildlife related recreation in the area as a result of the proposed project. The Department considers this area as an important habitat linkage for many species moving between sky islands of the Madrean Archipelago as well as a popular area for wildlife related recreation. Furthermore, if subsequent NEPA analyses are needed as a result of the proposed project, the Department would like to request participation as a cooperating agency due to the special expertise and jurisdictional authority for wildlife and wildlife resources.

Thank you for the opportunity to comment on this project. Please contact John Windes, Habitat Evaluation and Lands Program Manager in Tucson with any questions regarding this letter at jwindes@azgfd.gov, or at 520-388-4442.

Sincerely,



Raul Vega
Regional Supervisor, Tucson

cc: John Kraft, Sierra Vista District Biologist, USDA Forest Service
Celeste Kinsey, Sierra Vista District Ranger, USDA Forest Service
Julie McIntyre, USFWS Ecological Services
Jason Douglas, USFWS Ecological Services

AGFD # M20-09172017

Attachment: AGFD Environmental Review Tool Report

Arizona Environmental Online Review Tool Report



Arizona Game and Fish Department Mission

To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

Project Name:

San Antonio (Washington Gulch) Exploration Drilling Project 2020

User Project Number:

M20-09172017

Project Description:

IC Explorations, LLC. proposes to drill at up to five sites using a single reverse circulation drill rig. The proposed implementation timeline is 50 days, including 30 days of drilling and concurrent reclamation and 20 days for mobilizing, demobilizing, and final reclamation activities. Operating hours would be during daytime hours between sunrise and sunset. No nighttime activities or lighting or permanent structures are proposed. Upon completion of the project, all drill holes would be abandoned per state regulations and all equipment and temporary structures would be removed. All access roads would be left in their existing condition and may be closed for short periods of time to accommodate mobilization and demobilization.

Project Type:

Mining, Exploration

Contact Person:

Region5 Habitat Program

Organization:

Arizona Game and Fish Department

On Behalf Of:

AZGFD

Project ID:

HGIS-12082

Please review the entire report for project type and/or species recommendations for the location information entered. Please retain a copy for future reference.

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HabiMap Arizona data, specifically Species of Greatest Conservation Need (SGCN) under our State Wildlife Action Plan (SWAP) and Species of Economic and Recreational Importance (SERI), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:

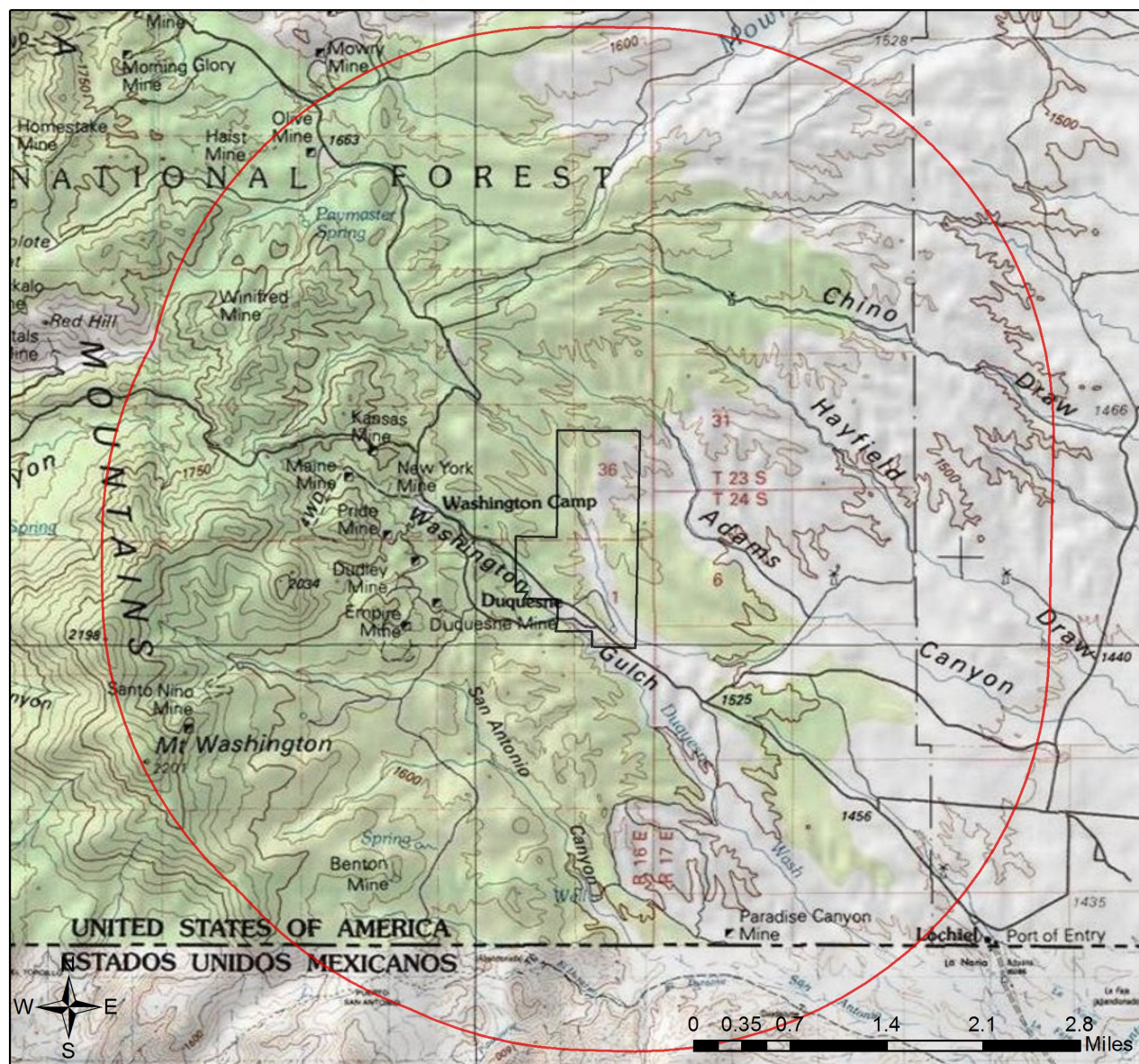
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366
Or
PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies

San Antonio (Washington Gulch) Exploration Drilling Project 2020

USA Topo Basemap With Locator Map



- Project Boundary
- Buffered Project Boundary

Project Size (acres): 670.66

Lat/Long (DD): 31.3771 / -110.6708

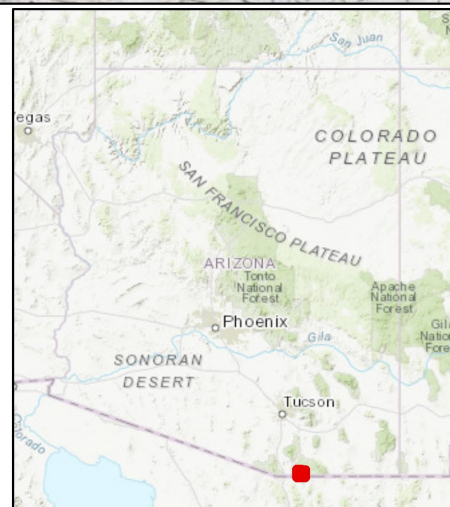
County(s): Santa Cruz

AGFD Region(s): Tucson

Township/Range(s): T23S, R16E; T24S, R16E

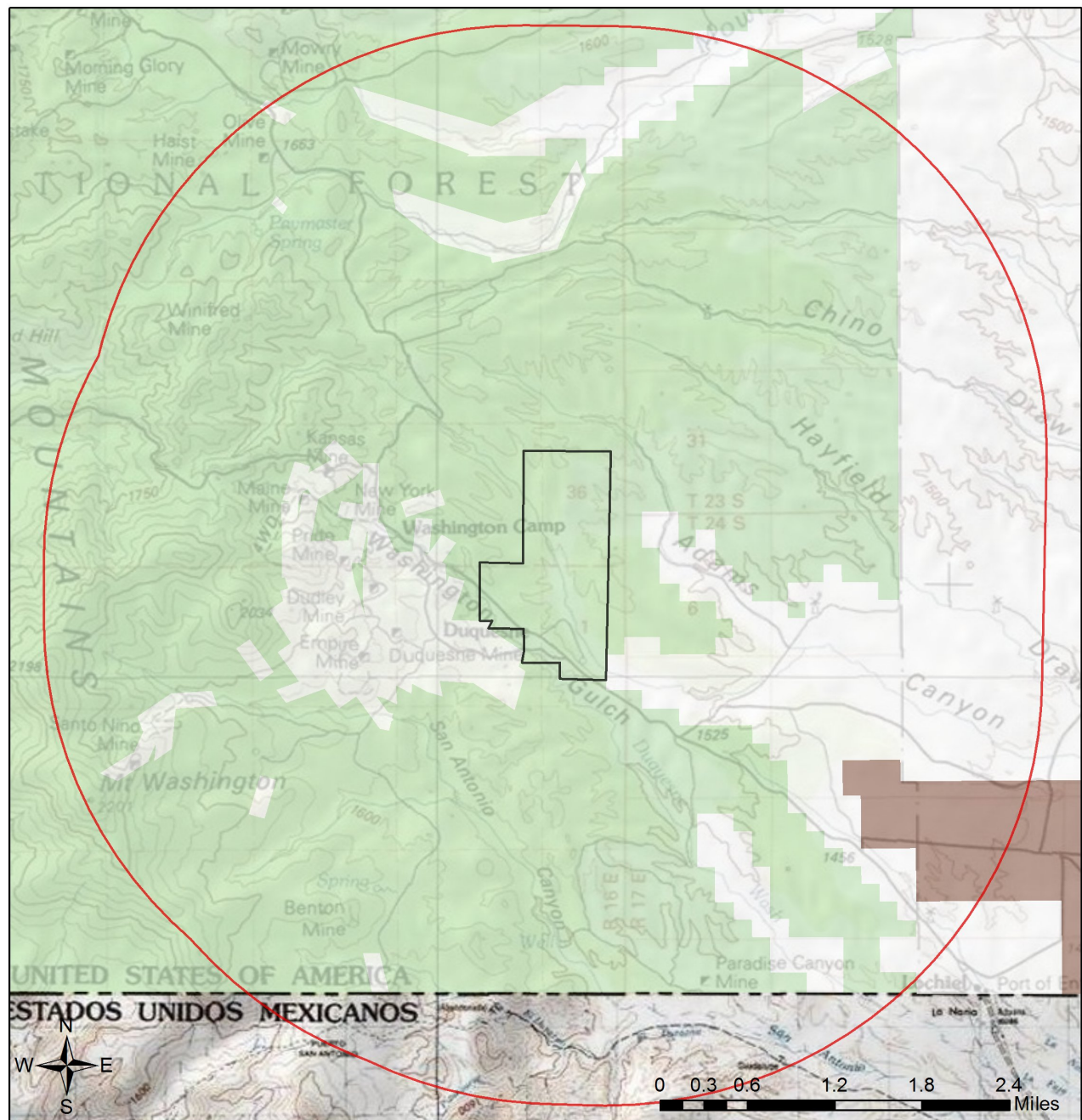
USGS Quad(s): DUQUESNE; HARSHAW

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap



San Antonio (Washington Gulch) Exploration Drilling Project 2020

Web Map As Submitted By User



- | | |
|---------------------------|------------------------|
| Project Boundary | Mixed/Other |
| Buffered Project Boundary | National Park/Mon. |
| Land Ownership | |
| AZ Game & Fish Dept. | State & Regional Parks |
| BLM | State Trust |
| BOR | US Forest Service |
| Indian Res. | Wildlife Area/Refuge |
| Military | |

Project Size (acres): 670.66

Lat/Long (DD): 31.3771 / -110.6708

County(s): Santa Cruz

AGFD Region(s): Tucson

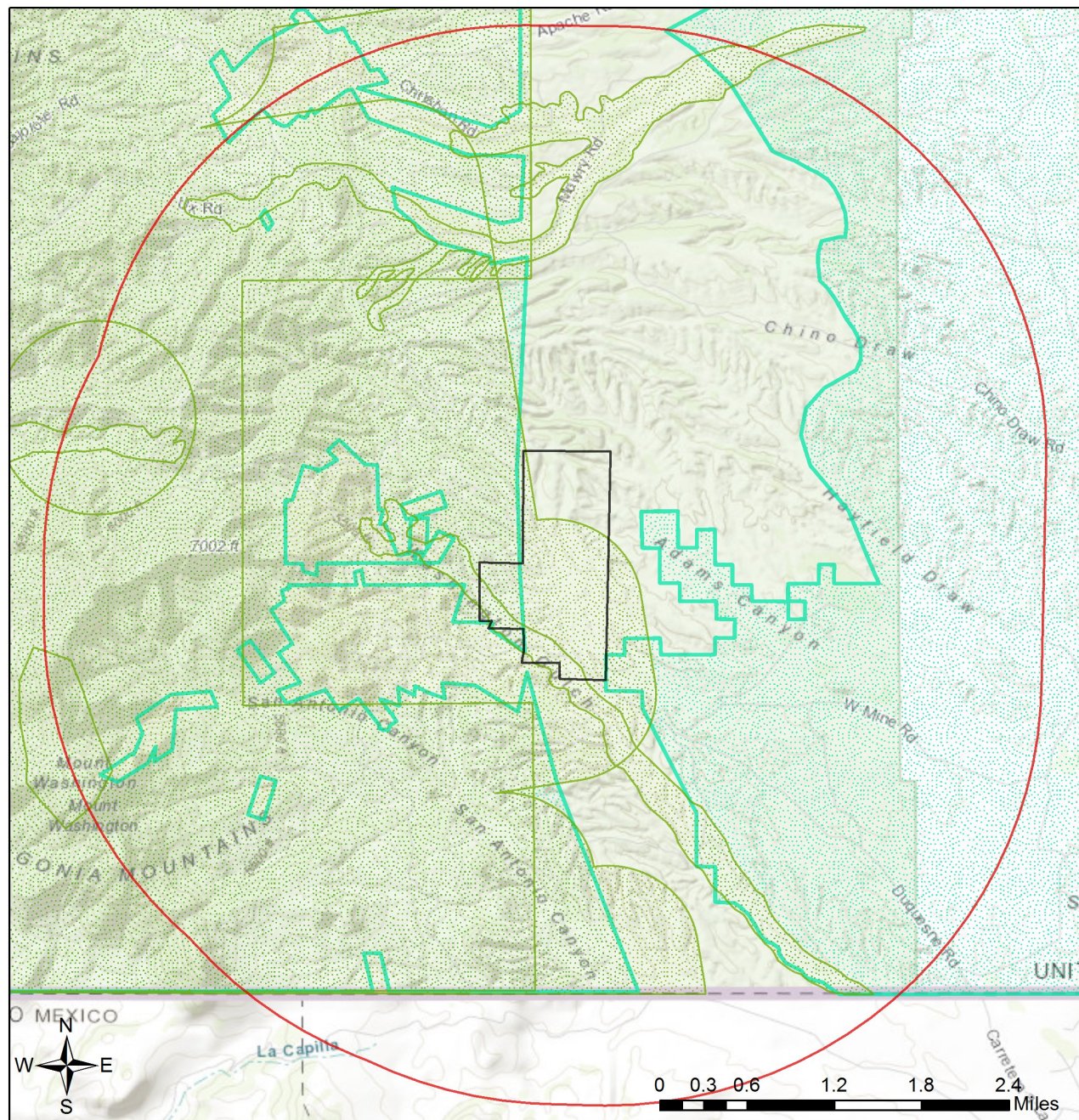
Township/Range(s): T23S, R16E; T24S, R16E

USGS Quad(s): DUQUESNE; HARSHAW

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San Antonio (Washington Gulch) Exploration Drilling Project 2020

Important Areas



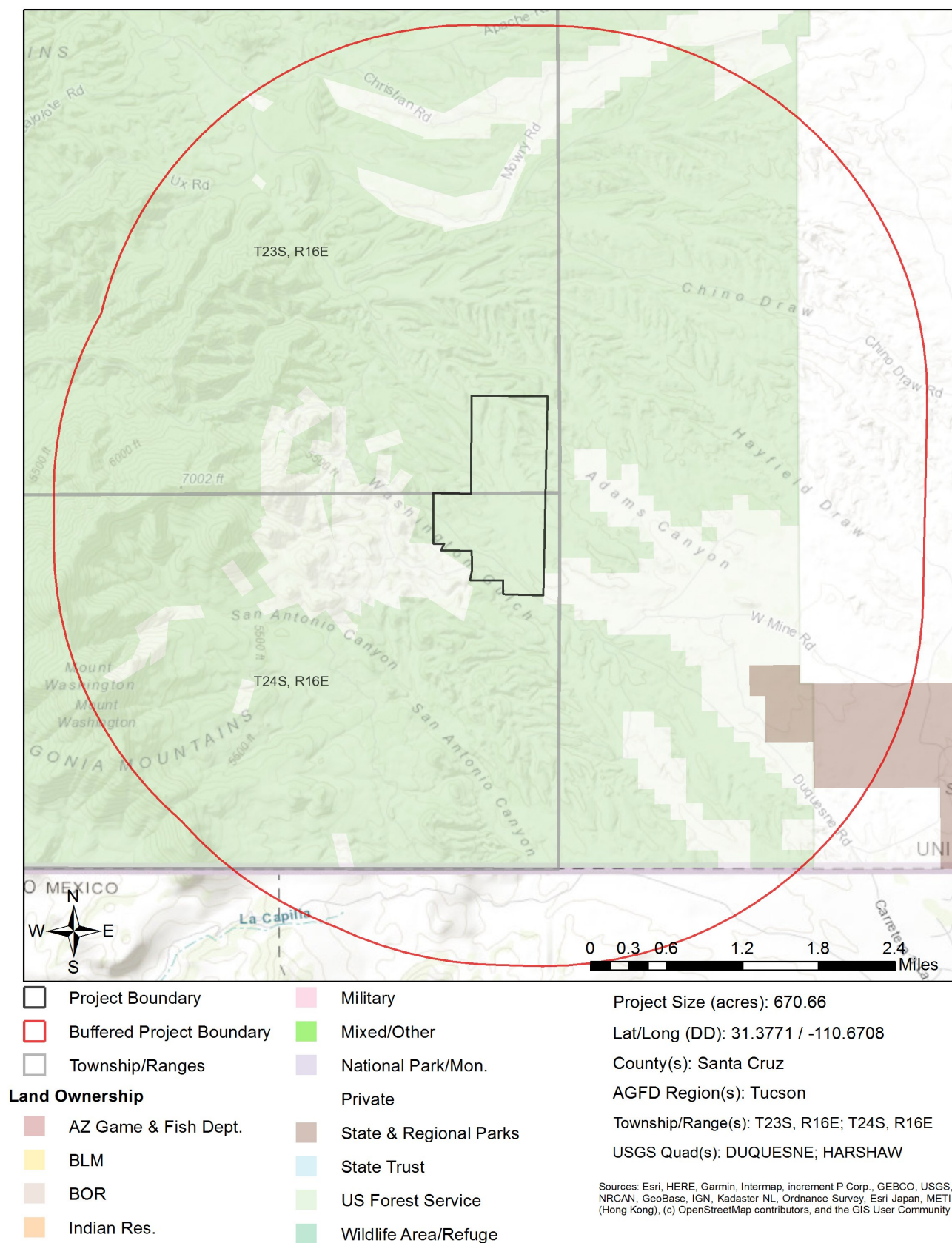
- Project Boundary
- Buffered Project Boundary
- Wildlife Connectivity
- Important Connectivity Zones
- Pinal County Riparian
- Critical Habitat
- Important Bird Areas

Project Size (acres): 670.66
 Lat/Long (DD): 31.3771 / -110.6708
 County(s): Santa Cruz
 AGFD Region(s): Tucson
 Township/Range(s): T23S, R16E; T24S, R16E
 USGS Quad(s): DUQUESNE; HARSHAW

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

San Antonio (Washington Gulch) Exploration Drilling Project 2020

Township/Ranges and Land Ownership



Special Status Species Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Accipiter gentilis	Northern Goshawk	SC	S	S		1B
Ambystoma mavortium stebbinsi	Sonoran Tiger Salamander	LE				1A
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S			1A
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Crotalus willardi willardi	Arizona Ridge-nosed Rattlesnake		S			1A
Euphorbia macropus	Woodland Spurge	SC			SR	
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1A
Heterotheca rutteri	Huachuca Golden Aster	SC	S	S		
Hyla wrightorum	Arizona Treefrog					1C
Hypsiglena sp. nov.	Hooded Nightsnake					1B
Leopardus pardalis	Ocelot Area of Possible Occurrence	LE				1A
Lithobates chiricahuensis	Chiricahua Leopard Frog	LT				1A
Lotus alamosanus	Sonoran Bird's-foot Trefoil		S			
Mammillaria wrightii var. wilcoxii	Wilcox Fishhook Cactus				SR	
Myotis velifer	Cave Myotis	SC		S		1B
Panthera onca	Jaguar Area of Possible Occurrence	LE				1A
Pectis imberbis	Beardless Cinchweed	PE	S			
Poeciliopsis occidentalis occidentalis	Gila Topminnow Refugia	LE				1A
Senticolis triaspis intermedia	Northern Green Ratsnake		S			1B
Sigmodon ochrognathus	Yellow-nosed Cotton Rat	SC				1C
Stenorrhynchos michuacanus	Michoacan Ladies'-tresses				SR	
Strix occidentalis lucida	Mexican Spotted Owl	LT				1A
Tantilla wilcoxi	Chihuahuan Black-headed Snake		S			1B
Thamnophis eques megalops	Northern Mexican Gartersnake	LT	S			1A
Trogon elegans	Elegant Trogon		S			1B

Note: Status code definitions can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/>

Special Areas Documented within the Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
CH for Panthera onca	Jaguar Designated Critical Habitat					
Canis lupus baileyi	10J area Zone 2 for Mexican Wolf	LE,XN				
PCH for Coccyzus americanus	Yellow-billed Cuckoo Proposed Critical Habitat					
Patagonia Mountains IBA	Important Bird Area					
San Rafael Grasslands IBA	Important Bird Area					

Note: Status code definitions can be found at <https://www.azgfd.com/wildlife/planning/wildlifeguidelines/statusdefinitions/>

Species of Greatest Conservation Need Predicted within the Project Vicinity based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Aix sponsa	Wood Duck					1B
Amazilia violiceps	Violet-crowned Hummingbird		S			1B
Ambystoma mavortium stebbinsi	Sonoran Tiger Salamander	LE				1A
Ammodramus savannarum ammolegus	Arizona grasshopper sparrow		S	S		1B
Ammodramus savannarum perpallidus	Western Grasshopper Sparrow					1B
Ammospermophilus harrisi	Harris' Antelope Squirrel					1B
Anthus spragueii	Sprague's Pipit	SC				1A
Aquila chrysaetos	Golden Eagle	BGA		S		1B
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		1B
Buteo regalis	Ferruginous Hawk	SC		S		1B
Buteo swainsoni	Swainson's Hawk					1C
Callipepla squamata	Scaled Quail					1C
Chordeiles minor	Common Nighthawk					1B
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S			1A
Coluber bilineatus	Sonoran Whipsnake					1B
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1B
Craugastor augusti	Barking Frog					1B
Crotalus lepidus	Rock Rattlesnake					1A
Crotalus tigris	Tiger Rattlesnake					1B
Cynanthus latirostris	Broad-billed Hummingbird		S			1B
Cynomys ludovicianus	Black-tailed Prairie Dog	CCA		S		1A
Cyrtonyx montezumae	Montezuma Quail					1C
Dipodomys spectabilis	Banner-tailed Kangaroo Rat			S		1B
Euderma maculatum	Spotted Bat	SC	S	S		1B
Eugenes fulgens	Rivoli's Hummingbird					1B
Eumops perotis californicus	Greater Western Bonneted Bat	SC		S		1B
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1A
Glaucidium gnoma gnoma	Mountain Pygmy-owl					1B
Haliaeetus leucocephalus	Bald Eagle	SC, BGA	S	S		1A
Heloderma suspectum	Gila Monster					1A
Hypsiglena sp. nov.	Hooded Nightsnake					1B
Incilius alvarius	Sonoran Desert Toad					1B
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		1B
Lampornis clemenciae	Blue-throated Hummingbird					1B
Lampropeltis nigrata	Mexican Black Kingsnake					1B
Lasiurus blossevillii	Western Red Bat		S			1B
Lasiurus xanthinus	Western Yellow Bat		S			1B

Species of Greatest Conservation Need Predicted within the Project Vicinity based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
<i>Leopardus pardalis</i>	Ocelot	LE				1A
<i>Leptonycteris yerbabuenae</i>	Lesser Long-nosed Bat	SC				1A
<i>Lepus alleni</i>	Antelope Jackrabbit					1B
<i>Lithobates chiricahuensis</i>	Chiricahua Leopard Frog	LT				1A
<i>Megascops trichopsis</i>	Whiskered Screech-owl		S			1B
<i>Meleagris gallopavo mexicana</i>	Gould's Turkey		S			1B
<i>Melospiza lincolni</i>	Lincoln's Sparrow					1B
<i>Micrathene whitneyi</i>	Elf Owl					1C
<i>Micruroides euryxanthus</i>	Sonoran Coralsnake					1B
<i>Myiarchus tuberculifer</i>	Dusky-capped Flycatcher					1B
<i>Myiarchus tyrannulus</i>	Brown-crested Flycatcher					1C
<i>Myiodynastes luteiventris</i>	Sulphur-bellied Flycatcher		S			1B
<i>Myotis occultus</i>	Arizona Myotis	SC		S		1B
<i>Myotis velifer</i>	Cave Myotis	SC		S		1B
<i>Myotis yumanensis</i>	Yuma Myotis	SC				1B
<i>Notiosorex cockrumi</i>	Cockrum's Desert Shrew					1B
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat					1B
<i>Odocoileus virginianus</i>	White-tailed Deer					1B
<i>Oreoscoptes montanus</i>	Sage Thrasher					1C
<i>Oreothlypis luciae</i>	Lucy's Warbler					1C
<i>Oxybelis aeneus</i>	Brown Vinesnake		S			1B
<i>Pachyramphus aglaiae</i>	Rose-throated Becard		S			1B
<i>Panthera onca</i>	Jaguar	LE				1A
<i>Passerculus sandwichensis</i>	Savannah Sparrow					1B
<i>Peucaea botterii arizonae</i>	Arizona Botteri's Sparrow			S		1B
<i>Picoides arizonae</i>	Arizona Woodpecker		S			1B
<i>Sceloporus slevini</i>	Slevin's Bunchgrass Lizard		S	S		1B
<i>Sciurus arizonensis</i>	Arizona Gray Squirrel					1B
<i>Senticolis triaspis</i>	Green Ratsnake		S			1B
<i>Setophaga petechia</i>	Yellow Warbler					1B
<i>Sialia sialis fulva</i>	Azure Bluebird					1B
<i>Sphyrapicus nuchalis</i>	Red-naped Sapsucker					1C
<i>Spizella breweri</i>	Brewer's Sparrow					1C
<i>Strix occidentalis lucida</i>	Mexican Spotted Owl	LT				1A
<i>Sturnella magna</i>	Eastern Meadowlark					1C
<i>Tadarida brasiliensis</i>	Brazilian Free-tailed Bat					1B
<i>Tantilla wilcoxi</i>	Chihuahuan Black-headed Snake		S			1B
<i>Terrapene ornata</i>	Ornate Box Turtle					1A
<i>Thamnophis eques megalops</i>	Northern Mexican Gartersnake	LT	S			1A

Species of Greatest Conservation Need Predicted within the Project Vicinity based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Thomomys umbrinus intermedius	Southern Pocket Gopher					1B
Troglodytes pacificus	Pacific Wren					1B
Trogon elegans	Elegant Trogon		S			1B
Vulpes macrotis	Kit Fox	No Status				1B

Species of Economic and Recreation Importance Predicted within the Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Cyrtonyx montezumae	Montezuma Quail					1C
Odocoileus virginianus	White-tailed Deer					1B
Patagioenas fasciata	Band-tailed Pigeon					1C
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Sciurus nayaritensis	Mexican Fox Squirrel					
Ursus americanus	American Black Bear					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Mining, Exploration

Project Type Recommendations:

Minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g., microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g., livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before leaving the site. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants, <https://agriculture.az.gov/>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control, <https://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/water/quality/?cid=stelprdb1044769>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information <https://www.azgfd.com/hunting/regulations>.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

Based on the project type entered, coordination with the Office of Surface Mining may be required (<http://www.osmre.gov/index.shtml>).

Based on the project type entered, coordination with State Historic Preservation Office may be required (<http://azstateparks.com/SHPO/index.html>).

Pre- and post-survey/monitoring should be conducted to determine alternative access/exits to mines and to identify and/or minimize potential impacts to bat species. For further information when developing alternatives to mine closures, contact the Arizona Game and Fish Department Nongame Bat Coordinator at the Main Office in Terrestrial Branch, <https://www.azgfd.com/agency/offices> or (602) 942-3000.

Based on the project type entered, coordination with Arizona Department of Environmental Quality may be required (<http://www.azdeq.gov/>).

Avoid/minimize wildlife impacts related to contacting hazardous and other human-made substances in facility water collection/storage basins, evaporation or settling ponds and/or facility storage yards. Design slopes to discourage wading birds and use fencing, netting, hazing or other measures to exclude wildlife.

Project Location and/or Species Recommendations:

Your project site is within one or more defined **Areas of Possible Occurrence**. Please follow Department protocols while working within an Area of Potential Occurrence at U:\Agency Directives\Jaguar Ocelot and Mexican Wolf Management Directive 20171215.pdf

HDMS records indicate that one or more native plants listed on the **Arizona Native Plant Law and Antiquities Act** have been documented within the vicinity of your project area. Please contact:

Arizona Department of Agriculture
1688 W Adams St.
Phoenix, AZ 85007
Phone: 602.542.4373

<https://agriculture.az.gov/sites/default/files/Native%20Plant%20Rules%20-%20AZ%20Dept%20of%20Ag.pdf> starts on page 44

HDMS records indicate that one or more **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at <http://www.fws.gov/southwest/es/arizona/> or:

Phoenix Main Office

9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office

201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office

SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

HDMS records indicate that **Chiricahua Leopard Frogs** have been documented within the vicinity of your project area. Please review the Chiricahua Leopard Frog Management Guidelines found

at: <https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/FINALLithchirHabitatGdlns.pdf>

The analysis has detected one or more **Important Bird Areas** within your project vicinity. Please see http://aziba.org/?page_id=38 for details about the Important Bird Area(s) identified in the report.

