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First name: Gitanjali

Last name: Bodner

Organization: The Nature Conservancy in Arizona

Title: Acting lead, Lands Program

Comments: Celeste Kinsey

District Ranger, Sierra Vista Ranger District

Coronado National Forest

October 19, 2020

Dear District Ranger Kinsey;

The Nature Conservancy would like to recognize the stand-out conservation value of the San Rafael Valley, express appreciation for the role the Coronado National Forest (CNF) plays in supporting that value while executing its multiple-resource mandate, and share our concern over projects that could undermine both the conservation values and the ongoing balance of resource management in the valley. In light of these factors, we request that the Coronado National Forest conduct an independent Environmental Assessment for the proposed San Antonio exploratory drilling project, rather than using a Categorical Exclusion to approve a proposal based on the project proponent's own limited evaluations.

The San Rafael Valley is one of the most intact, healthiest grassland landscapes remaining in Arizona (Bodner et al. 2013). TNC ecoregional assessments rank this valley and surrounding lands as having some of the highest overall conservation value in a two million square mile area of the mountain West; much of this occurs on lands managed by the Coronado National Forest (Marshall et al. 2006; TNC 2006; USDA Forest Service 2018). The valley's woodlands and grasslands support unfragmented habitat for a wide range of wildlife. The southward-draining watershed supports unique valley bottom wetlands with several federally listed imperiled species, and forms the headwaters of the binational Santa Cruz River.

Many different entities have invested in protecting and sustaining the stand-out conservation value of the area. We estimate that well over \$20 million has been invested in conservation in the valley; this number includes purchase price for lands and conservation easements, and some of the ongoing conservation management by The Nature Conservancy and the Arizona Land and Water Trust. A full accounting of conservation investments would need to add expenditures by ranchers and other private landowners, by the Arizona State Parks Department in managing their San Rafael State Natural Area, by agencies such as the US Fish and Wildlife Service and Arizona Game and Fish Department, and by the Coronado National Forest itself.

Projects such as the San Antonio exploratory drilling proposal and associated mineral extraction put these conservation values and investments at risk. In this case, proposed drill locations are within 600m of private ranch lands over which The Nature Conservancy holds conservation easement. TNC has a legal and ethical responsibility to protect these lands from activities that could impact the conservation value recognized by the easement. The level of analysis in the project's proposed Plan of Operation is not adequate for us to evaluate potential impacts to this property or to our broader investments.

We feel strongly that Categorical Exclusions are not sufficient to identify issues, analyze potential impacts, and evaluate tradeoffs of projects such as this. It is the CNF's responsibility to carry out the due diligence of conducting an independent analyses of potential impacts and mitigation measures, rather than relying solely on a project proponent's description of these. The fact that the CNF oversees lands with higher animal diversity and more federally listed imperiled species than any other National Forest in the country gives it a special responsibility within the US Forest Service. The San Rafael Valley's outstanding value for conservation, ranching, water resources, and recreation further underscores the importance of the CNF's due diligence in this area. Environmental Assessments for exploratory drilling are not uncommon in the USFS, and are an important mechanism for identifying issues and proposing solutions. An EA done by the Coronado National Forest would

presumably begin by evaluating alignment and potential conflicts with the Coronado Forest Plan and associated Travel Management Plans. Project proponents may not recognize or reveal such issues. In this case, for example, major portions of the FR5500 and FR4707 roads that this project proposes to use to access drill sites, are described in the 2011 Travel Management Plan as having no documented right of access, are targeted for decommissioning, and have been removed from USFS maps of roads open for public use. A CNF analysis would presumably also identify additional reasons given for decommissioning these roads including their infringing on goshawk territories; the 2018 Forest Plan has explicit terms for avoiding disturbances in these goshawk management areas. The project's Plan of Operation looks at short-term impacts to eight federally listed species; under its 2018 Forest Plan, the CNF has long-term responsibilities for many more species, resources, and users that are not evaluated in the Plan of Operation.

Both ecosystems and human communities depend on the scarce water of this valley, that is sustained by rainfall in the Patagonia Mountains. Among other issues, we would like to see how a CNF analysis would evaluate the risks associated with mining activity in an area of mountain front recharge, along a major tributary to the Santa Cruz River headwaters, and near the Harshaw fault which is recognized in Barksdale's descriptions of the site for investors but is not discussed in the proposed Plan of Operation. While the CNF might still choose to allow activities proposed here, an independent analysis would enable both the agency and stakeholders to understand tradeoffs and propose mitigating measures.

Having identified these issues with just a few hours of our own due diligence, we wonder what additional issues would be uncovered by an independent EA, and its broader consultation with stakeholders, that were not addressed in the proponents' Plan of Operation.

The Nature Conservancy appreciates the multiple use mandate on National Forest lands that provide so many benefits to nature and people. We also recognize that the ability of the US Forest Service to meet its full multiple use mandate into the future depends on minimizing short-term and long-term impacts of each use on others. Thorough evaluation of tradeoffs, especially where particular resource values are especially high, is key to minimizing these conflicts and maximizing overall benefits from National Forest lands. We are committed to helping accomplish this, for the benefit of people and nature.

Sincerely,
Gitanjali Bodner, Ph.D.
The Nature Conservancy in Arizona
Acting lead, Lands program

Literature cited:

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