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Dear Coronado National Forest staff:

I wish to caution you against approving the proposed Small Tracts Act sale of National Forest land to Arizona Minerals, Inc. that is directly tied to the Hermosa mining project. There is absolutely no doubt that it will facilitate extending the mine's operations into more ecologically sensitive areas where species frequent that the Forest Service is obligated to protect. Because at least 15 federally listed species migrate through or nest or grow in this general area, an ill-advised sales will likely result in a significant cumulative impact on the area. It should not be approved, BUT IF IT IS, both the USDA FS and South32 will be mired in many more years of expensive and tedious litigation

The Patagonia Mountains are home to many threatened and endangered species and to date, South 32 has not made good on its promise to meet on the ground with each and every non-profit and agency engaged in conservation and protection on their behalf in this Patagonia vicinity. Despite a sustainability plan posted on its website that require South 32 to consult with local organizations to protect hotspots of biodiversity, it has rebuffed our request to do so, that its own VP for Sustainability agreed to almost 3 years ago. Forest Service needs to consult with the U.S. Fish and Wildlife Service regarding the potential sale's impacts on all affected threatened and endangered species and their designated critical habitats before the sale is to be approved. It and independent experts need to analyze and verify that the wildlife and plant citations its consultants have verified in the area are being included in all reports to USDA FS and USFWS. We will not tolerate mere lip service or greenwashing from any company or agency.

In addition, the Patagonia Mountains are within the homelands of living Indigenous communities, with 12 place names of the Tohono and Sobapuri O'odham and Yaqui still known from the Patagonia Mountains and nearby areas in Santa Cruz County that are part of the same Santa Cruz watershed. The Forest Service should first consult with any First Nations Legislative Councils that attach religious or cultural significance to sacred sites or any other traditional cultural properties prior to approving the proposed sale, as the Park Service will be doing routinely under Interior Secretary Halaand and NPS Director Sams. These are protected by Constitutional religious freedom principles just as much as churches, synagogues and mosques are.

Gary Paul Nabhan, PhD , Patagonia Az resident

Franciscan Brother