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Comments: October 17, 2016 Coronado National Forest ATTN: Minerals & Geology Staff/Rick Goshen 300 W Congress St. 6th Floor Tucson, AZ 85701 Re: Hermosa-Taylor Deposit Drilling Project Dear 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-Taylor Deposit Drilling Project (Project), submitted by Arizona Minerals, Inc. (AMI) to develop eight exploratory drill holes at three drill sites (pads), impacting 0.92 acres on Forest lands in the Patagonia Mountains. In addition, two temporary access roads of 0.07 miles and 0.25 miles in length would impact an additional 0.62 acres of Forest lands. We understand that the Forest is considering preparing an environmental assessment for AMI's proposed plan, and therefore offer our assistance and expertise in developing mitigation through the National Environmental Policy Act (NEPA) process. Attached is a report from our Online Environmental Review Tool available at <https://azhgis2.esri.com>. 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 report provides a list of special status species and special areas documented within a three-mile buffer of the project site. We request the Forest avoid impacts to the Special Status Species known to occur within 3 miles of the proposed drill sites, and to Arizona's Species of Greatest Conservation Need (SGCN) and of Economic and Recreation 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 is no longer the case, it would be useful for our review to be informed of the revised schedule. As originally planned, the October 1 start date was expected to allow for completion of all tree removal, road development, drilling, and reclamation activities prior to the June 1 start of the breeding season for the threatened western yellow-billed cuckoo (*Coccyzus americanus*). The Plan could benefit from additional text outlining the procedure for curtailment of project-related activities during seasonal restrictions in the event the Project does not commence early enough to allow 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 a period of approximately 5 months. The noise, human presence, and lighting associated with this activity would all combine to make the site and the surrounding areas extremely inhospitable to wildlife and to a lesser degree, recreationists. The Forest should analyze all such impacts to wildlife and recreationists in the NEPA analysis. Any other wildlife-disturbing activities occurring within the project vicinity should also be included in the NEPA analysis in addressing cumulative impacts and/or connected actions. The project should be evaluated with the greater ecosystem in mind, including connected habitats in the San Rafael Valley and Sonoita Creek, as well as potential impacts from pollution, habitat fragmentation, traffic, and disturbance. Because this area is an important habitat linkage for many species moving between sky islands and to and from Mexico, we urge the Forest to address 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 for Gould's turkeys. The Department has invested significant resources in restoring the turkey population in the Patagonia Mountains. The Plan estimates Project use of 20,000 gallons of water per week to be obtained from an existing well on AMI's private land. Although the Plan states this is within the range of water use for drilling programs completed by AMI on their private lands over the past eight years and would purportedly not constitute a substantial change from existing conditions, such water use should be analyzed during the NEPA process. In particular, this analysis should examine impacts to surrounding water sources that may be connected. The Department is especially concerned with the cumulative impacts of this project, including impacts from mining in the event minerals are located. The Forest should address the cumulative effects 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 of some species and their need to move between mountain ranges. The proponent should mitigate impacts [in-kind, in time.] The Forest should consider off-site mitigation. 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 any questions regarding this letter at kterpening@azgfd.gov, or at 520-388-4447. Sincerely, Kristin Terpening

Region V Habitat Specialist
cc: Jean Calhoun, USFWS Ecological Services
Attachment: AGFD Environmental Review Tool Report Arizona