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Dear representatives of the Bureau of Land Management (BLM),

This letter is about the [Environmental Assessment \(EA\) process for exploratory copper drilling by Faraday Copper](#), as well as its relationship to the new public lands rule. We request an acknowledgement of receipt and a response from the BLM.

The application in the referenced EA process specified an intention to do exploratory drilling at 67 sites. On May 2, 2024, members of our all-volunteer conservation organization learned that 11 of those 67 sites had been segmented from the larger project and approved for drilling activity by the BLM prior to completing the EA process. This segmentation of the original plan of operations constitutes a violation of [43 CFR § 3809.21\(b\)](#).

We request that the BLM direct Faraday to cease all drilling at those 11 sites and then proceed with completion of the EA, including meaningful public participation associated with the National Environmental Policy Act (NEPA) and consultations associated with the National Historic Properties Act (NHPA).

Our request is not solely based on the violation of the above-cited NEPA regulation, but also because BLM representatives have shown a pattern of deferring to the business interests of extractive land-use proponents in this rural watershed, while cutting short meaningful public participation.

Because of its high-value ecological and indigenous cultural landscape, the San Pedro River watershed has become the go-to site for mitigating adverse impacts caused by land-disturbing activities taking place elsewhere in Arizona. Compensation for such impacts includes a major 3000-acre mitigation designation (the 7B Ranch) that is a vital part of the Copper Creek wildlife connectivity corridor. This corridor is already being affected by Faraday's recently accelerated exploration activities.

Our citizen-led efforts to protect the ecological and cultural integrity of this important watershed tend to be viewed by the BLM as distractions from processing new land-disturbing activities proposed by applicants. However, these activities affect the long-term ecological value of critical mitigation designations, such as the 7B property, and our involvement should not be regarded as a distraction. Our conservation organization did not learn about Faraday's 11-site exploration approval through the BLM's project website, which has not been updated since November of 2022. Nor did we learn about this major change from any of the local BLM representatives. There has been no effective outreach from the BLM associated with Faraday's

new plan of mineral exploration. In the end, we learned about this change from a press release by the Faraday CEO boasting to potential investors.

This lack of two-way communication with the BLM is not an isolated situation for us. In 2021 our organization reached out to the acting BLM director about the SunZia Transmission project's new plan of electrical service, asking why far less impactful route alternatives were not being considered in Arizona when, at the same time, a supplemental EIS was being initiated to make major route changes in New Mexico. At the end of that one-hour phone conference, we were told by Acting Director Culver that she would find out why route alternatives were not being considered in Arizona now that the plan of electrical service had changed. She assured us we would not be left "in a black box." We never heard back, despite sending her follow-up emails.

The BLM recently announced a new conservation-centric [Public Lands Rule](#), and Director Stone-Manning and state Director Suazo subsequently made [assurances that conservation on public lands in Arizona would benefit from this rule](#). Keeping grass-roots conservationists in a "black box" will not help to achieve the stated purpose of this new rule.

We advocate herein that the BLM recognize the ecological and indigenous cultural importance of the San Pedro River watershed and conduct their NEPA and NHPA processes accordingly. We reiterate our request that the Faraday EA be completed before exploration on public lands begins on any of the originally specified 67 sites.

A handwritten signature in black ink, appearing to read "P. 2. Else", is written over a horizontal line.

Peter Else, chair
Lower San Pedro Watershed Alliance
Contact information in the letterhead