



# State of New Mexico

Michelle Lujan Grisham  
*Governor*

September 26, 2019

Vicki Christiansen  
Chief, United State Forest Service  
Sidney R. Yates Federal Building  
201 14th Street, SW  
Washington, DC 20024

Re: USDA Santa Fe National Forest: Tererro Exploration Project

Dear Chief Christiansen:

I write to express my opposition to plans to begin mining exploration in the upper Pecos Valley, which could lead to the resumption of large-scale hard rock mining in the valley. My administration has heard from many New Mexicans who are deeply concerned by the prospect of mining resuming in the Pecos Valley, which contains the Tererro remediation site. This valley was once the scene of large mining and milling operations that contaminated the Pecos River and spread toxic mine waste materials all through the valley. After a long and expensive cleanup, which has already cost approximately \$36 million, and elements of which are expected to continue for the foreseeable future, the Pecos Valley has rebounded and is now of great environmental, economic, cultural, historical, and recreational importance to New Mexico.

On June 3, 2019, New World Cobalt (Comexico LLC) applied to the New Mexico Mining and Minerals Division for a permit to conduct mining exploration activities within the Santa Fe National Forest. The project proposes to construct 30 drill holes and drill pads at 84 potential locations, claiming a disturbance of 2.1 acres, all on land owned by the United States Department of Agriculture Forest Service. The New Mexico Mining and Minerals Division believes that the actual disturbance caused by exploration will be more than the proposed 2.1 acres. This discrepancy in acreage is important for both review and financial assurance purposes. In addition, miles of access roads will need to be constructed or improved to support the drilling activity. The Forest Service's approval of this industrial activity would clearly be a major action, which could significantly and negatively affect the quality of the environment in the Pecos Valley for ecological, recreational, and economic opportunities.

The Forest Service must take the impacts of mining exploration in the Pecos Valley more seriously and should prepare a full Environmental Impact Statement under the National Environmental Policy Act (NEPA) to evaluate the potential significant impacts associated with this exploration project. The project is located within the upper Pecos Valley where numerous people live, work, hike, fish, hunt, camp, backpack, and otherwise enjoy the unique environment. The potential impacts to all of these values must be considered as part of the Forest Service's obligations under NEPA.

Among the broad range of impacts the project will have are:

- The environmental importance of the Pecos River and its watershed which provides fresh water downstream for hundreds of miles and includes a high-quality fishery and a fish hatchery near the proposed project;
- The cultural and historical importance of the upper Pecos Valley, which has been occupied for thousands of years. Within the valley are sites of great cultural and historical relevance to many New Mexicans;
- The recreational importance of the upper Pecos Valley and adjacent Pecos Wilderness, which serves as a major area for fishing, camping, hunting, backpacking, hiking, horseback riding, and other recreational activities. These activities are conducted all through the upper Pecos Valley including on Forest Service lands and other public lands, including the recently established Pecos Canyon State Park; and
- The combined economic impact of all these above activities, which provide numerous jobs and resources for the nearby communities.

The Forest Service should carefully consider the cumulative impacts from past mining within the upper Pecos Valley. The previous mine and mill sites, although reclaimed, will need consistent and extensive monitoring in perpetuity. The New Mexico Game and Fish Department and New Mexico Environment Department will have to continually inspect buried waste piles to ensure there is no erosion or discharge into the Pecos River. These environmental effects would only be compounded by future mining and exploration efforts in the region. The documented costs of reclaiming the previous mining operations are approximately \$36 million, of which the state of New Mexico has contributed approximately \$7 million. Although the environmental conditions have vastly improved, money is spent annually on studies and sampling with no end in sight. As an example, a new fence alone, slated for construction this year, is estimated to cost \$1 million.

Finally, this proposed project has generated significant public comment and concern. The Forest Service must provide an opportunity for robust public comment and should seriously consider the concerns raised by residents and visitors. Resumption of mining in the upper Pecos Valley presents unacceptable risks to an area still recovering from damages inflicted by past mining activities.

Thank you for your consideration of these concerns and I look forward to your reply.

Sincerely,



Michelle Lujan Grisham  
Governor

cc: Cal Joyner, Southwest Regional Forester  
James Melonas, Forest Supervisor, Santa Fe National Forest