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Sierra Vista Ranger District

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<https://cara.ecosystem-management.org/Public/Commentinput?Project=55719>

SUBJECT: SUNNYSIDE EXPLORATORY DRILLING PROPOSAL IN THE PATAGONIA MOUNTAINS

Dear Sir,

My wife and I recently (February 2018) bought a home in Patagonia AZ as a place of refuge during the winter months. It has been perfect for us after exploring the region for the past 4 years. Its vibrant community, its successful recreation-tourism-environmental-based economy, public lands with rich flora and fauna, water resources, birding, hiking, river corridor and much more are to be highly valued and protected. But the threats of current and future mining have begun to denigrate our quality of life and threaten our well-being and health. Noise impacts, potential impacts to our water well's quality or quantity, day and night visual impacts, and impacts to the environmentally-based economy are not welcome.

My comments pertain to Plan of Operations for Sunnyside exploratory drilling. I was taken aback when I saw that only an Environmental Assessment (EA) was to be conducted in this rich and diverse eco-region. At minimum an Environmental Impact Statement (EIS) should be required since the Sunnyside Operations Plan (Project Number 2810-030503 dated and revised 08/16/19) clearly states on page 4, "Arizona Standard's proposed Sunnyside Exploration Drilling Project is designed to evaluate the location, concentration, quality, and type of mineralization in the area, and to help establish the **feasibility of possible future mining operations.**" Through an EIS, let's now fully determine and understand the impacts of just this exploratory effort. This way the proponent and citizens impacted by this proposal can fully understand the ramifications. The proponents would say this is a minor effort when compared with a future mining, milling and other permanent facilities. I would disagree. Here are the reasons an EIS is essential:

- **Cumulative impacts:** Cumulative impacts will occur in the Patagonia Mountains due to multiple proposed mining projects; this alone should trigger an EIS. The cumulative impacts include, but are not limited to:
 - Abandoned and leaking mines
 - Current mining companies' extraction activities
 - Other mining exploration activities
 - Livestock grazing
 - Border patrol and safety
 - Recreation activities (hiking, horse riding, biking, atvs, etc.)

- **Flora and fauna:** This region is a part of the Madrean Pine Oak Woodlands, a global biodiversity hotspot.
 - The proposed project will take place in a Mexican Spotted Owl Protected Activity Center. Cause-effect relationship: the proposed drilling operation will dramatically and irretrievably disturb the owls.
 - The Patagonia Mountains are home to dozens of species listed as threatened or endangered under the Endangered Species Act (ESA), including jaguars, ocelots, lesser long-nosed bats, Mexican spotted owls, and the yellow-billed cuckoo. Cause-effect relationship: the proposed drilling operation will dramatically and irretrievably disturb all species.
 - The Patagonia Mountains are a significant corridor for wildlife movement and one of the few remaining long range corridors. There is “no action alternative” to disrupting this corridor.

- **Water Quality and Water Quantity:** There is “no action alternative” to protecting our water quality and quantity.
 - This Plan of Operations proposes to truck in water from other confirmed sources. All those confirmed sources are upstream or downstream of this project. All watersheds are connected. Confirmed water sources include, but are not limited to, the City of Nogales (Kino Springs), Santa Cruz County (Nogales International Airport), and the City of Sonoita. There is no City of Sonoita.
 - A comprehensive study should be conducted of the entire groundwater system throughout Santa Cruz County because there is significant science on changing water conditions due to ongoing drought with all science indicating worsening conditions for the foreseeable future.
 - This project will occur in a Forest Service designated Municipal Watershed (Town of Patagonia). The waters of Harshaw Creek and Alum Gulch originate in the Sunnyside Project area and provide a critical source of drinking water for residents of the Town of Patagonia and wildlife alike in the watershed.
 - Water quantity is affected since the proponent has not clearly demonstrated where the water is coming from. The drilling alone requires 12,500 gallons of water per day per drill rig. Further with the proposed 30 drilling sites (the number of drill holes have not been defined) reaching depths of up to 6,500 feet, they’re bound to disrupt the area’s aquifer which is typically encountered at 1,000 feet, posing additional risk to the Town’s and other’s water supply.
 - Water quality impacts caused by erosion of past and newly disturbed areas.

- **Air Quality:** Federal agencies report that the air quality in the Patagonia area has been declining. This must be reversed. All mining activities (exploratory or otherwise) will have a negative impact on air quality. There is “no action alternative” to protecting the vital air that we breathe into our bodies.

- **Noise:** The narrow topography of Humboldt Canyon, where the drilling is largely planned, would magnify the noise of the project's non-stop drilling, making for a very loud 24 hours a day, 7 days a week, up to 7 yearlong headache. The noise produced by the drilling may reach 98 decibels, which is akin to riding a motorcycle or operating a chainsaw.
- **Soils:** This area is increasing its local food production. Mining activities including road expansions will expose toxic materials that are likely to leach into the soils of outlying areas through air and water migration. Monsoonal season bring large storms that easily erode soils and contaminants that have been disturbed.
- **Cultural Resources:** The Patagonia Mountains are known to have been inhabited for more than 10,000 years. All efforts must be made to identify and protect these cultural resources.
- **Dark Skies:** Everyone who visits this area comments on the beauty of the dark skies. What impact will 24/7 operations for up to total of 30 drilling sites have over the course of seven years.
- **Roads:** What impact will drilling rigs, water transport trucks and other support vehicles traveling along Harshaw, Flux Canyon and Forest Service roads? The plan calls for "upgrading" about 8.5 miles of roadways to accommodate the vehicles to an average of 18'. Many of the roads are currently narrow and expanding them may impact flora, fauna, soils, cultural resources. Impacts to be considered include safety, air quality (emissions and dust), recreational activities and road capacities. This level of road disturbance is in an area with multiple endangered species and designated protected areas is unacceptable.
- **Visual Impacts:** Drilling pads and expanded roads are a blight on the land especially when scattered over a fragile landscape.

Further concerns of mine include two things. First is the lack of USFS enforcement of permits whether they be for mining or other uses on forest service lands. This lack of manpower to adequately monitor proposed and current activities is due to budget cutbacks caused by Washington. Secondly are the impacts to the Patagonia region's recreation and tourism economy that relies on a pristine landscape and protected environment supportive of its rich and diverse flora and fauna. Our tourism and recreational visitors and locals are supportive of this beneficial long-term economy as opposed to the destructive and short-term gain of mining.

Regards,

Chuck Klingenstein, AICP
Park City, UT & Patagonia, AZ