Sierra Vista Ranger District

District Ranger, c/o Rick Goshen

4070 S Avenida Saracino

Hereford AZ 85612

RE: San Antonio Exploration Drilling Project

IC Explorations LLC is a subsidiary of Barksdale Resources Corporation, which already has an application for exploratory drilling permits on its Sunnyside Project outstanding. The Forest Service needs to be aware that the San Antonio Project and The Sunnyside Project are owned by the same company. Attached is a new release from Barksdale showing its acquisition of these projects. Barksdale has a history of submitting SOPA’s requesting Categorical Exclusions when the impact of the project demands at least an Environmental Assessment (EA)

This comment is requesting that you require an Economic Assessment with regards to this project, rather than a Categorical Exclusion, for the following reasons :

1. The Western Yellow-billed cuckoo was reaffirmed to be a threatened species as recently as September 2020 and the area of proposed exploration is considered critical habitat for these birds. The Plan of Operations relies on outdated studies and resources in its analysis of species in the area.
2. For other endangered and threatened species in the area, the Plan of Operation is referring to outdated studies when more recent studies exist.
3. The Plan of Operations says that the area to be drilled is not located in the viewshed of any nearby trailheads etc. But the area IS populated and drilling activity will interfere with this population.
4. Cultural artefacts have been found in washes that are within the project area and in washes that trucks and heavy equipment will be crossing. It is not possible to say that the project will not adversely impact these resources.
5. Duquesne Road is not suitable for truck traffic and equipment. The project equipment and vehicles will pass right by an elementary school, and both teachers and students cross the road from the parking area to get to the school.

We respectfully request that you request that an Environmental Assessment be performed to more accurately assess the impact of this projected work. There are enough potential impacts that a Categorical Exclusion is just not warranted.

Very truly yours

Valerie Neale