



Tohono O'odham Nation
Office of the
Chairman and Vice Chairwoman

Ned Norris Jr. Wavalene M. Saunders
Chairman Vice Chairwoman



October 19, 2020

Sierra Vista Ranger District
District Ranger, c/o Rick Goshen
4070 S. Avenida Saracino
Hereford, Arizona 85615

Re: IC Explorations, LLC Plan of Operations San Antonio Exploration Drilling
Project Located in the Patagonia Mountains

Dear Sir or Madam:

The Tohono O'odham Nation has only just learned of the proposed exploratory mine drilling project proposed by IC Explorations, LLC, referenced above. The Nation hereby submits the comments below, but has not had sufficient time to comprehensively study and analyze the entire scope of the proposed project. The Nation hereby requests a copy of the AZPDES General Permit for Stormwater Discharges Associated with Industrial Activity – Mineral Industry (MSGP); and requests that the project be required to implement a Stormwater Pollution Prevention Plan (SWPPP). In order to review the requested information, the Nation requests a thirty (30) day extension to the comment period. Given the grave potential impacts of this project, the Nation urges that an Environmental Assessment of the project be required. Finally, the Nation requests required government-to-government consultation on this project as it goes forward. *See Exhibit A- Resolution of the Tohono O'odham Nation Council.*

INTRODUCTION

At the outset, the Nation wishes to express its profound concern and opposition to the exploratory drilling project in the Patagonia Mountains proposed by IC Explorations, LLC. Drilling projects are intended to be a precursor to a mine site, which would cause serious and irreparable damage to both the human environment, and the unique and irreplaceable ecosystem surrounding the San Rafael Valley and Santa Cruz River, which is of direct concern to the well-being of the people of the Tohono O'odham Nation.

MINING IS ONE OF THE LARGEST SOURCES OF TOXIC POLLUTION

Exploratory drilling and the resulting mining operations are one of the largest sources of environmental pollution worldwide. Mining exploration, construction, operation, expansion, and abandonment result in dramatic destruction of the environment, including surface water quality, groundwater quality, and air quality. Leakage of toxic chemicals from mine sites is a direct threat to human health and the safe use of resources for generations. *See Exhibit B – Potential Mining Impacts Associated with Barksdale Resources Drilling Program Proposal, San Antonio Project, in the Patagonia Mountains.*

Mine exploration adversely impacts air and water by releasing chemicals onto the land, and into the air and water. Patagonia Mountain mining areas are known to have zinc-lead-silver minerals associated with porphyry deposits. Many metal ions bioaccumulate and biomagnify in the environment with adverse impacts to plants and animals. Lead and zinc ions are especially toxic to plants, invertebrates, and fish. Refinement of sulfidic zinc ores produces large volumes of sulfur dioxide and cadmium vapor.

PROPOSED EXPLORATION DRILLING AND ANY RESULTING MINE THREATEN WATER QUALITY OF SANTA CRUZ RIVER IN SAN XAVIER DISTRICT

This exploration drilling project and any resulting mine project would threaten the water quality of the Santa Cruz river which crosses the San Xavier District of the Nation. As such, the mining exploration and proposed mine have a direct and adverse impact on the Nation. Accordingly, the San Xavier District has had an ongoing concern regarding the protection of ecological and community systems in the San Rafael Valley. In 2008, the San Xavier District Council passed a resolution supporting the work of the organization called the “San Rafael Valley: A Land in Balance” protecting the San Rafael Valley. *See Exhibit C – Resolution of the San Xavier District Council.*

In accordance with the recommendations of the Tohono O’odham Department of Water Resources, the Nation requests that the proposed project operate according to the requirements of the AZPDES General Permit for Stormwater Discharges Associated with Industrial Activity – Mineral Industry (MSGP). Additionally, as required by the Arizona Department of Environmental Quality MGP program, IC Exploration, LLC should be required to implement a Stormwater Pollution Prevention Plan (SWPPP) to minimize and manage stormwater in the project area. The Nation requests a copy of the General Permit and the SWPPP. *See Exhibit D – Department of Water Resources Comments.*

THIS EXPLORATION DRILLING PROJECT AND MINE THREATEN ENDANGERED PLANTS AND ANIMALS CHERISHED BY THE NATION

This exploration drilling project and any resulting mine threaten no less than twenty (20) threatened and endangered birds, threaten no less than seven (7) essential grasses and plants in the surrounding grassland, and threaten no less than twenty-one (21) threatened and endangered animals. Exploratory drilling and any resulting mine will have a direct adverse impact on the habitat, eliminate food sources, fragment wildlife corridors, potentially cut-off and change migratory routes, and change the current predator/prey balance of animals cherished by the Nation. *See Exhibit E – Wildlife and Vegetation Department (WVMP) Comments on the San Rafael Watershed (San Antonio Project).*

CONCLUSION

On behalf of the Nation, I stress our concern regarding the multiple, direct, and adverse impacts of the proposed drilling project and potential resulting mining operations. The Nation hereby requests a copy of the AZPDES General Permit for Stormwater Discharges Associated with Industrial Activity – Mineral Industry (MSGP), and request that the project be required to implement a Stormwater Pollution Prevention Plan (SWPPP). Accordingly, the Nation would appreciate additional time in which it can review the requested information to provide further comments. Additionally, the Nation urges that an Environmental Assessment be required. The Nation looks forward to necessary government-to-government consultations regarding this project going forward.

Respectfully,



Ned Norris, Jr.
Chairman
Tohono O'odham Nation

cc/w/ attachments: Kerwin S. Dewberry, Forest Supervisor
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300 W. Congress St.
Tucson, Arizona 85701

via email/electronic/w/attachments: <https://cara.ecosystem-management.org/Public/CommnetInput?Project=58629>
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