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First name: Cynthia

Last name: Berk

Organization:

Title:

Comments: Scoping Comments to US Forest Service

Attention:

Date: September 29, 2016

Subject: Proposed Arizona Minerals Inc. Hermosa-Taylor Drilling Project

To Whom It May Concern:

Thank you for the opportunity to express my concerns regarding the Plan of Operations for the Hermosa-Taylor Drilling Project in the Patagonia Mountains on the Coronado National Forest.

In the 20+ years I have lived in southeastern Arizona I have come to know the Patagonia Mountains for what they are: an irreplaceable living treasure held hostage by the whims of mankind. After reading the scoping notice provided by the Forest Service dated September 7, 2016, I was disturbed by the glib, business- as-usual attitude evident in the letter where it mentions how [ldquo]the responsible official anticipates preparing an Environmental Assessment[rdquo] so AMI can get on with their plans. And then it occurred to me that you probably have not witnessed the significant negative impact AMI[rsquo]s drilling on private land has already had on the National Forest and the abutting community. Therefore, I draw your attention to the following issues.

Access: I am concerned about various access issues. The primary access is through the heart of Patagonia on Route 82 and then on to Harshaw Rd. Ongoing mining trucks plus 10 or 18 wheel drilling supply trucks, port-a-potty cleaning, trash pickup etc. will be a burden on roads that are not maintained for that degree of traffic. Pot holes will develop and weight of heavy trucks will cause degradation. The maintenance of these roads is shared by the Town of Patagonia and Santa Cruz County. Both are struggling to stay within budget. As a matter of fact the County has just increased property taxes. The Forest needs to address this issue by researching the amount and cost of future maintenance needed by the increased use. This is an important element in keeping the roads safe. Use modules and budget issues need to be examined. Harshaw Road, comprised of (FR 58) and (FR 49), is a narrow winding road unsuited to large vehicles in a hurry to get to work. People who don[rsquo]t live here but who are punching a time clock have little stake in maintaining the infrastructure. Visitors and locals recreate on these roads, walk to school, ride bikes, exercise and sightsee: and when the slower moving more vulnerable users interface with the heavy mining equipment and fast moving traffic, opportunities for accidents greatly increase. Traffic from AMI[rsquo]s current exploratory drilling has already increased drastically. In the evening when I drive home with the sun in my eyes and the air is saturated with the dust of mining vehicles leaving as well as trucks headed up to the mine, I am acutely aware of the significant potential for accidents.

Within the project area, the so called [ldquo]temporary access roads[rdquo] that AMI plans to create will act as conduits for many heavy vehicles during all kinds of weather. 220 trees as well as soil will be removed. If you had seen the roads put in for the existing drilling you would also realize the need for concern. There are roads where Harshaw Creek has been filled in with dirt and roads traversing and scaling the sharp, steep hillsides. It is important to know that roads are forever. Eight years ago when we retired a road on our property, we built check

dams, raked gravel size rocks out of the old roadbed to increase grass re-vegetation and created canals to keep the fast moving water off the road. Even though it has shown great improvement, there is no question that it was ever anything but a roadway. Once there, roads cannot be erased. And just because these [ldquo]temporary roads[rdquo] are being constructed on [ldquo]previously disturbed land[rdquo] does not make their construction a moot point. The Forest needs to investigate their impact, along with that of the existing [ldquo]temporary roads,[rdquo] on the health of the forest.

Wildlife: I am seriously concerned about the affects this project, in conjunction with multiple mining sites and projects, Border Patrol activity, past and future wild fire impact and climate change expectations will have on the ecosystem of the Patagonia Mountains, one of the last remaining cross border corridors in Arizona. The Hermosa-Taylor Drilling Project will compound the disturbance already underway in the sensitive area along FR 49. Ongoing drilling on private land is frightening to see for humans. Try driving up Harshaw Road after dark. It looks and sounds like space ships are landing on both sides of the road for a significant distance. Imagine how solitary, secretive animals would react! According to Game and Fish there are more than 100 federally Threatened, Endangered and Sensitive species in the Patagonia Mountains area and this is the type of list that just continues to grow. The list includes the endangered Jaguar and Ocelot and other wide ranging native species as well as many delicate and sensitive plants, reptiles and birds. The impact on these inhabitants needs to be calculated by a thorough Environmental Impact Statement to prevent the upgrade of these and other Sensitive species to Threatened and Threatened to Endangered. You need to determine what species are in the target area so you can study how they will be affected by generator and drilling noise, 24 hours of light and constant traffic. The Forest Service should work closely with Arizona Game and Fish to develop an in depth study of potential affect.

Reclamation Bond: It is paramount that the Forest Service reflects on the historical aspects of mining when setting a bond to insure restoration of the environment. There have been at least five decades of evidence that mining companies don[rsquo]t follow through with regulations. What if AMI goes broke and inflation makes it more attractive to give up the bond money than to follow through with necessary reclamation of the damaged area? The Forest Service already has more derelict mines than it can deal with. All facets of disturbance need to be calculated in order to determine an adequate bond.

Tourism: The heavy impact of the mining industry competes directly with what is the livelihood of local businesses: tourism. The Patagonia Mountains are a mecca for birders, astronomers and scientists of all disciplines along with nature lovers in general. Many birders drive or walk into the forest taking advantage of the secluded quietude to discover the remarkable variety of wildlife. Bicycle riders train on forest roads. Hikers and runners are numerous. They are drawn by the nature of the area. Protecting the environment from mining degradation protects the economy. This is yet another issue that needs the study of an Environmental Impact Statement.

Options: To determine whether or how this project should proceed, an in depth study of the Plan of Operation and alternative approaches should be examined. The original idea outlines a 5 month/7 day/24 hr. approach. What would the impact reduction be if the time element was reduced to an 8 hour day? Adjustments could be made to lessen the disturbance on wildlife activities, traffic congestion, and tourism. In order to make an informed judgement on the wisest approach these different scenarios need to be investigated.

Water: The scoping notice states the expected water use for the 5 months of drilling is 400,000 gallons of water. Even though AMI plans to use water from wells on their private property, a thorough study should be made to determine the draw down on the designated [ldquo]Municipal Watershed[rdquo] for the Town of Patagonia. Additionally, I don[rsquo]t think it should be overlooked that Arizona is, in much part, a desert where water can make or break life as we know it. My husband and I transport our dish water out to the trees every day in order to maximize its use. Anyone who goes into the forest in the Coronado can[rsquo]t help but see how drought is affecting the oaks. Fifteen years ago firewood was hard to come by. Now there are dead and dying trees wherever you look. Water is dear. Water quality is equally important and should also be monitored. It is better to over compensate when it comes to protecting the aquifers from pollutants. Flooding is a seasonal way of life in Arizona. Every year during the rainy season the water in Harshaw Canyon bubbles with frothy grey discharge from past mining developments. Aquifers must be a priority and the Forest Service should study every aspect of water usage in this project.

We know that [ldquo][hellip]the Forest Service is obligated to process, administer, and manage mining operations conducted on NFS land under the authorities of laws and regulations that confer on the public a statutory right to go upon and use open public domain land.[rdquo] But that doesn[rsquo]t mean you have to cut corners for these mining interests. You have another obligation and that is the [ldquo]management to mining-related activity on NFS land to minimize adverse environmental impacts on service resources.[rdquo] In order to fulfill that obligation you must examine every possible complication that is foreseeable. Management of the Forest is at a critical juncture and therefore more important now than it has been ever before. Fires, drought, global warming and human impact burden the system. Nobody knows when the tipping point will be reached or how many projects like this one can be implemented before the burden to the system prevents retrieving a balance. Foresight is paramount. Why conduct a brief Environmental Assessment when the detail and thorough analysis of an Environmental Impact Statement is a wiser choice? In fact, due to the rebirth of mining interest in the Patagonia Mountains, the potential cumulative effect on the Coronado National Forest and the Town of Patagonia should require the Forest Service to do ALL THEY CAN to be prudent.

Thank you for considering my concerns.

Sincerely,

Cynthia Berk