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First name: Maggie

Last name: Urgo

Organization: Patagon Bike rental

Title: CO-owner

Comments: Scoping Comments on Proposed Hermosa-Taylor Drilling Project #50097 10/10/2016

Maggie Urgo and Patrick O'Neal

Patagon Bike Rental

PO Box 483, Patagonia, AZ 85624

Attachments:

Article from recent Patagonia Regional Times

Article on the importance of biking to Arizona revenue

Patagon Bike Rental Bike map

Phoenix magazine promotion of biking in the area

Article discussing an Australian Local Government Association's State of the Regions report

TO: Coronado National Forest

We own Patagon Bike Rental in Patagonia as well as a home in Patagonia.

We have already seen some deleterious effects of the AMI drilling operations on their private land. We have a significant number of issues and concerns about their proposed Hermosa-Taylor Drilling drilling project in the National Forest. We are concerned about the cumulative effect these two operations can have and would request they not be viewed in isolation from each other and other mining related activity in the area (old mines leaking etc.)

1) Increased Deterioration of Harshaw road and other area roads.

We speak to and work with many visitors to our area, as well as many local people who are avid bikers. We direct our customers to utilize the exact area which will be most heavily impacted by this project, particularly Harshaw Road. It has already been impacted by the AMI drilling project on their private land, which is accessed through Harshaw road, a major biking area. Bikers we have spoken with have said that they have noticed the Harshaw surface is already deteriorating, and a cattle guard has come loose.

We are concerned that this additional project will further deteriorate the roads out to that area. Before this project is approved we think it is important to have a thorough assessment of the roads and a determination of the load bearing capacity of all the impacted surfaces. These are old roads around here, and the town does not have the money to fix them, and we doubt the county has the money either. These roads can also be narrow and curvy, and have dangerous washboard conditions in some places (washboard conditions which would increase due to increased traffic).

For example, we access our property through 1st Avenue in Patagonia, where water trucks from a construction project were getting water from a town hydrant for a short time. It appears the weight of their trucks created a very large and deep pothole right next to the hydrant that Patrick almost hit one night when returning home after dark. This pothole created a dangerous situation and one can only imagine what continued heavy truck and increased vehicle traffic will have on all the utilized road surfaces.

2) Increased danger because of more traffic on Harshaw and other area roads

Yet more drilling in this same general area will increase traffic of all types at all hours. These roads are already used by Border Patrol, hunters, ranchers, car tourists, bikers and hikers, and free range cattle as well as the current AMI drilling operations. We have frequently seen local trucks speeding along these roads. Perpetuating and adding additional traffic on these roads, especially if the heavy truck traffic continues to deteriorate the road surfaces, may create a more dangerous traffic situation than already exists (never mind trees and rock falls on the roads that happen from time to time). Any project that in any way increases traffic may lead to serious consequences. In addition already approved plans for remediation of various leaking mines in the area will increase traffic on these roads. What will be the total effect?

### 3) Effect of 2 additional access roads being cut into this area, Loss of trees and clearing of land for new pads

There are already a number of roads that have been bulldozed in this area on AMI's private land, as well as trees lost, and areas cleared of vegetation for pads. More roads, lost trees, and pad construction mean more water runoff. Destruction of the vegetation and change in the topography will allow more water to flow in less predictable ways. This is part of the same watershed as the town of Patagonia and the surrounding streams. What will the cumulative effect of these new Hermosa-Taylor Drilling roads, pads and removed trees, added to the already changed topography from the private AMI drilling locations, be in monsoon season? We already are in an area of flash floods, how might this affect the streams in the area, possibly increasing the danger of flash floods?

We have included an article from the Patagonia regional times about a recent flood problem. Much of Patagonia lies below the flood plane. One small example, we live on a road that was recently extended and regraded by the same local construction company (D&M Excavation) that will likely create these 2 access roads. We were told that our road would be carefully graded and become "the best in the area", there was even a hydraulic study done. Yet, though it has been worked on several times, water is pooling in one place in the road, creating a huge mud puddle, the middle of the road has a deep crevice and a major trench is now being cut on one side of the road by the runoff which may eventually create other issues down the line. It is clear that "deliberate" control of water runoff from dirt roads in this area is not possible (we invite you to inspect North Avenue).

In addition, since this entire area has been the site of mining in the past, when environmental implications were largely unknown, who knows what type of contamination lies in the soil in the proposed drilling area? Is it possible that disrupting the soil and creating new water channels will contaminate the watershed, with broad effects on the wildlife and humans in the area? Perhaps even increasing the possibility that old or unknown mines and old test mine holes will flood and create more Trench mine type issues?

### 4) Increased Social Hostility in the area with economic implications

We have attached an article from the Patagonia Regional Times about a town council meeting which we attended in which we felt the actions of mining "supporters" created a hostile environment. The T-shirts that were distributed read "Don't be fooled by fabricated paranoia". It seemed to us this was directed at those in the meeting who were raising their just concerns about water sales to AMI and a lack of enforcement of town road weight rules which would also impact the drilling traffic in the area. We felt this phrase was essentially calling those raising these issues liars.

We think the hostile atmosphere inspired one pro-mine person to declare that those in town who didn't get with the program might find in the future that if they need help they won't get it. To us the fact that questions about the Fire chief and Mayor's financial relationship to AMI was an issue in the meeting was taken by us to be a veiled threat, and was likely taken as such by others attending as well. Now, to be clear, D&M (the contractor who does a lot of work for AMI and was the source of this t-shirt) and AMI did not make this threat, nor did the fire chief/mayor, but this is an example of the type of hostility that was evident and we think encouraged by the T-shirt statement. We don't know the process behind the creation of this T-shirt, but the AMI representative at the

meeting certainly did not denounce it or make any attempt to distance AMI from the T-shirt statement or from any of the other "supporters" statements and we aren't aware of any AMI statements since the meeting. What does it say about a company that they don't object to actions by overt "supporters" of their mining plans and their local subcontractors like this? How will they treat us when they have even more activity in the area?

Repercussions of this meeting are continuing, it affected the town council elections (see article) and we know of several people in town who have stopped patronizing a couple of the local businesses who were t-shirt wearing outspoken "supporters" in the meeting. This is a town where people go out of their way to patronize local businesses, often spending more than they would need to by shopping elsewhere because they want these businesses to do well. What will the economic effect in the town if things become increasingly polarized and hostile? Will a hostile environment begin to affect tourism, making the town less welcoming to visitors? Patagonia (and the surrounding area) is a town that has developed a particular character. Tourists come here for the unique blend of art, environmental concerns, outdoor experience, bird and animal variety, relaxation and natural beauty, not hostile fights over mining. Already the presence of a significant number of mine workers living in 5th wheels is changing the town character. What impact will adding more drilling and mine workers to this mix have on the tourist related businesses such as ours?

If this new project is hastily approved without a full environmental impact statement it will be a significant problem for the town.

We believe a thorough EIS by AMI would reassure the town that the cumulative effects of adding this new project to the existing drilling on their private land, as well as other AMI and non-AMI work on leaking old mines, etc. will not create a "tipping point" on our water quality and supply, deteriorate our roads, affect the town economically and create other significant problems. It could help ameliorate some of the hostility.

#### 5) Decrease in tourist revenue.

It is quite possible this project, if approved, will move us closer to closing our business. We have already contemplated this because of the current AMI drilling, but this project could be the straw that breaks our company.

The attached bike map shows the importance that immediate area has to biking in this region. The exact area proposed for exploratory drilling is ideal for mountain biking, and regularly used by locals as well as a growing number of in-state and out-of state tourists. The hard packed red clay roads make much of the area accessible for novice mountain bikers, and there are some challenging areas that are of interest to more technical mountain bikers. It is spectacular in its beauty, has fascinating geology and topography and an unspoiled character that the presence of an additional drilling project will most likely undermine with more noise, dust and increased vehicle traffic. The Hermosa-Taylor Drilling project will add to the existing AMI drilling already underway, increasing the cumulative impact.

Arizona is seeing significant economic revenue from biking related activities. Attached is an article showing the economic gains to the state. Also attached is an article from Phoenix magazine that named renting a bike from Patagon Bike Rental and exploring this area as one of 52 weekend adventures to take [Note: they covered us again this year, 2016]. This shows biking increases the economic activity internally to the state as well as from out of state tourism, and the importance of this area for biking in Arizona.

We think our bike map of the area, showing mileages, gives a good picture of how this proposed drilling would be in the middle of a very important area for this whole section of southern Arizona in addition to showing its value for biking activity.

#### 6) Potential impact on housing

We understand that the real estate businesses in town have not been having a good year. It is important to know if that is because those who would traditionally be attracted to this area are becoming reluctant to move here because of the presence of the AMI drilling and their additional mining claims in the National Forest (implying the possibility of future large scale mining), as well as the toxic mine leaks which have made national news. Again, what is the cumulative impact here? We don't know but think it is important to find out before this project is approved.

We have attached an article discussing an Australian Local Government Association's State of the Regions report. While not totally applicable because it references small towns that already have working mines in the area (As opposed to test drilling), we think that there is still some applicability to this proposed project. The main takeaway is that when a small town has an influx of miners the housing situation changes. Already in the area there is not enough rental and short term housing to accommodate all the tourists we can attract.

Because of AMI's existing drilling over the summer the main housing in town, the hotel, was filled up with mine workers. As was most of a new trailer park. Where will tourists and other visitors like hunters stay if there are even more miners in town for longer periods? It is virtually certain that miners, who work long shifts and then take off, will not become major patrons for the art galleries and tourist oriented shops in the area. They may visit them once or twice, but tourism relies on a constant turnover of people on vacation with time to wander through the shops, rent bikes to see the National Forest and go to wine tastings. If these people can't stay in the area the tourist businesses will collapse sooner than later.

Is AMI planning on bringing in more people to work on this new project? How many of their people will be staying in town. When and for how long?

#### 5) Impact on the Arizona Trail

We often see groups of hikers with backpacks hiking up Harshaw. Patagonia is a Gateway Community for the Arizona Trail, one of only two towns in the state that it passes through. The Arizona Trail, comes out of the forest and goes several miles on Harshaw and through the town of Patagonia right on the road the drilling vehicles are and will be traveling (see our map).

The section of Harshaw that is part of the Arizona trail is paved but very narrow and curvy. It has no sidewalk and is unlit at night. Trail hikers will not likely have lights or reflective clothing at night and be walking right on a road these commercial vehicles will be using. This could be disastrous. This is unlike the Rosemont mine exploration, which the Arizona trail goes near, in that the trail is actually potentially integrated with the operations, instead of staying at a distance.

Even more commercial vehicle traffic on that section of the trail, as well as noise from drilling and traffic could potentially destroy the use value of the Arizona Trail from this section down to the border, a significant chunk of it. It could put a break in the Trail itself as a dangerous and undesirable section to be avoided by hikers. We think it important to consult with the Arizona Trail on this matter, as the Arizona Trail is a major state resource and accomplishment.

#### 6) Water quality and availability

In sum, we request the Forest Service require a full Environmental Impact Statement for the Hermosa-Taylor Drilling test drilling project before approval, taking into account the cumulative impact it can have with other activities in this area. Like many others in we are extremely concerned about the impact on our water, both quantity and quality, however that question is well known. We have tried to raise other angles for consideration here. One point we think is important to make however. Water is a huge issue nationally. People have

experience with various federal, state and local governmental agencies letting them down on this issue, take for example what has happened to Flint Michigan where sloppy oversight caused a very serious public health danger which is still ongoing. This was such poor oversight that criminal charges have been filed against various government officials who should have been guarding the public interests but were not. We hope the Forest Service takes this to heart and requires a full environmental impact study before granting any approval for test drilling in the Coronado national forest.

Maggie Urgo and Patrick O'Neal  
Patagon Bike Rental