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Title:
Comments: Comments on the proposed Plan of Operations for the Hermosa-Taylor Deposit Drilling Project submitted by Arizona Minerals, Inc.

The U.S. Forest Service proposes to approve Arizona Minerals, Inc.'s Plan of Operations that would authorize Arizona Mining, Inc. (AMI, formerly Wildcat Silver) to drill eight exploratory holes to obtain characterization of mineralization. The environmental impacts of proposed drilling will be significant for several reasons, each of which is addressed below.
Habitat degradation- In addition to this proposed drilling on public land, there has already been significant exploratory drilling on approximately 500 acres of private land for the Hermosa-Taylor Deposit Drilling Project. Over 40 exploratory holes have already been drilled since March 2016 on private land. Natural terrain has already been significantly altered, roads have already been graded, and a significant number of trees already destroyed in addition to the 220 trees slated for cutting. Denuded slopes are clearly visible from public roads and erosion/sedimentation already poses a significant threat to aquatic environs downstream. Such significant construction impacts, already excluded from public comment due to their location on private land, must be addressed and considered as cumulative when considering potential effects of these proposed drilling activities on public lands. Has USFS quantified such negative impacts of the drilling that has already occurred on private land? What will be the cumulative effects of the proposed action and the drilling that has already occurred?

Jaguar Critical Habitat- The entire proposed drilling area is listed as Critical Habitat for jaguars, for which adverse modifications are illegal. What have been the significant impacts to Critical Habitat where drilling has already occurred since March 2016? To what degree will the proposed drilling adversely and cumulatively impact the area in terms of topographic alterations, noise and light pollution, water quality, water availability, and its effect on the behavior of jaguars, prey species, and sympatric species like ocelots? All of these factors could significantly and illegally negatively impact Jaguar Critical Habitat.

Why has the proposed project not taken into consideration seasonal peaks in jaguar and ocelot activity, especially since it occurs within Jaguar Critical Habitat? Clearly warranted is an investigation into all of the significant ecological impacts of the proposed drilling (both direct and indirect), considered congruently with drilling already performed on private land and with impacts of pre-existing mining disturbances. Cumulatively, all of these actions represent a significant degradation of critical habitat for an endangered species.

Lighting/noise- While AMI states that "lights used for night work and safety will be directed or shielded to minimize nightlight effects", this was not adequately performed for drilling that occurred already on private property (residents of the area attest to a significant impact on dark night skies, likening the area to a sports stadium). Has this light pollution already significantly impacted neighboring residents, or nearby observatories like the Smithsonian, or threatened and endangered nocturnal species?

With drilling to occur 24/7, has USFS considered the significant impacts to native fauna in terms of disturbances such as lighting and noise, especially as it pertains to species such as lesser long-nosed bats, Mexican spotted owls, ocelots, and jaguars? Will any of these species be displaced from obligatory foraging areas or travel routes? By avoiding the proposed project area due to noise and light disturbances, listed species may be forced into adjacent areas, many of which are already disturbed by the same kinds of activities.

Approximately 500 acres of adjacent private land has already been disturbed and degraded by the same Company and Project. Has USFS examined the cumulative impacts of all existing drilling and mining activities in terms of displacing listed species? Has USFS consulted with USFWS regarding impacts on Mexican spotted owl

activity, jaguar critical habitat, and the presence of other federally listed species, all of which could be significantly impacted by the proposed activities?

Water- AMI states that water will be piped in from existing wells. There are a significant number of abandoned mines in the immediate area known to be currently leaking significant amounts of toxic water. For example, remediation is ongoing for the Lead Queen Mine, which spews significant amounts of toxic water into the watershed following heavy rain events. There are 130 additional mine sites that also require remediation for the same reasons, each of which represents a significant source of pollution for the water table and watershed. The cumulative impacts of these significant sources of pollution must be examined when considering the effects of new drilling activities.

With proposed exploratory holes reaching depths of up to 4500', will these new drill holes intersect any historic tunnels or any tainted water supplies? Has USFS already mapped existing underground mining structures? What is the source and quality of the water that will be used for the proposed drilling? Is it considered reclaimed water? Has USFS conducted water quality assessments for this water that will be injected into the drill holes? Have/will these results been made public prior to the proposed action? Why are some of the existing structures associated with this project located in/near wetlands (at the west gate on Flux Canyon Road)?

Traffic/Road grading- There are 53 vertebrate species currently listed as Threatened, Endangered, or USFS Sensitive in the Patagonia Mountains (as well as 59 plants). However, only a small fraction of these species (9 vertebrates and a few plants) been surveyed for in relation to these activities according to AMI's plan. Are there plans to survey for the remaining species? Has AMI monitored and inventoried the loss of threatened, endangered, or sensitive avian species, mammals, and herpetofauna that has already occurred from grading roads and increased traffic on private land? Will these potentially significant casualties be monitored on our public lands?

A Multiple Use Landscape- The Coronado National Forest is touted as the "Land of Many Uses". Our National Forests are supposed to be the public's ultimate foundation for clean air and water supplies. Unfortunately, modern mining activities significantly compromise and are often mutually exclusive with the production of clean air, clean water, wildlife, recreation opportunities, hunting, ranching, and more. Why are so many of these other uses for public land so readily cast aside in the interest of mineral extraction activities? Activities that permanently alter and degrade the landscape, pollute water supplies, and compromise wildlife habitat cannot be considered part of a multiple use policy. Has USFS considered, compared, and justified the economic value of foreign company mineral extraction activities versus the economic value of maintaining natural areas for wildlife tourism, recreation, hunting, ranching, and production of clean air and clean water? Will such an analysis be made public as it relates to the Hermosa-Taylor Deposit Drilling Project?

Thank you for the opportunity to comment on this proposed action, and we look forward to hearing your response on each of these issues and areas of concern.

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