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TO: Rick Goshen, Sierra Vista District Ranger, Coronado National Forest

**COMMENTS ON SAN ANTONIO EXPLORATION DRILLING PROJECT CATEGORICAL EXCLUSION,
PROJECT #58629**

I have lived in the Patagonia Mountains for almost 22 years; my very essence is interwoven with the energies of this ecosystem. Six different biological provinces overlap in this region: Rocky Mountains, Sierra Madre, Sonoran Desert, Chihuahuan Desert, Great Plains, and Neo Tropics. There are more than 300 species of birds. Patagonia is the pollinator capital of the United States with over 600 species of native bees, 300 types of butterflies and moths, 14 hummingbird species, and two nectar feeding bat species. There are currently 112 Federally threatened, endangered, and sensitive species in the Patagonia Mountain area.

E.O. Wilson (American biologist, researcher, theorist, naturalist, and author) writing in his latest book "Half Earth: Our Planet's Fight for Life" makes the point that even though extinction rates are soaring, a great deal of Earth's biodiversity can still be saved. Wilson contacted 18 of the world's senior naturalists (each with international expertise in biodiversity and ecology) and asked them to "name one to five places in the world you consider best on the basis of richness, uniqueness, and most in need of research and protection . . . " Among the top choices are the Madrean mountain chains of Mexico and the Sky Island heights of the southwestern United States == which includes the Patagonia Mountains.

Because there are extraordinary circumstances, I request that the US Forest Service require an Environmental Assessment or an Environmental Impact Statement for the San Antonio Exploratory Drilling proposal filed by IC Exploration.

THREATENED AND ENDANGERED SPECIES

Where are the results of surveys conducted in Spring 2020, as stated in the PoO?

OLD data, surveys, and research are referenced in the PoO. A clear example is the entry for the Sonoran Tiger Salamander: the PoO cites a 2002 FWS survey and ignores/omits any more recent data, when in fact a survey was done as recently as 2018 by the State of Arizona Game & Fish Dept.

Why does the PoO omit recent scientific data? These more recent surveys must be included rather than ignored to ensure accuracy of the PoO and potential damage to TES species. The Forest Service needs to require current data be cited rather than obsolete surveys.

The Yellow-billed Cuckoo (YBC) is a Federally Endangered species present in the project area, yet the PoO states they are not present and cites OLD DATA. Tucson Audubon conducted a survey in 2018; sightings are also recently recorded on e-bird, a recognized and respected web platform. Why are these data ignored in the PoO?

WATER USAGE

The PoO does not state how much water would be used over the course of the project. Why not?

Many historic mines in the area were flooded by a high water table or water from fractures in aquifers. If a significant amount of ground water enters one or more drill holes, the local water table may be depleted, affecting local wells which provide water to local residents. How is this being addressed?

The 1897 Organic Act states that one of the principal purposes of the US Forest Service is to secure favorable conditions of water flow; please ensure that water usage in this project is estimated, documented, and reported by the mining company.

CULTURAL AND ARCHEOLOGICAL RESOURCES

Hohokam artifacts have been found in the areas toward and around Lochiel. Have the tribes been contacted about impacts to ancestral lands and sites?

Has a recent cultural and archeological survey been done? If not, why not?

CONCLUSION

The Forest Service must require an Environmental Assessment or an Environmental Impact Statement rather than a Categorical Exclusion to ensure that the San Antonio project area and its biological residents and visitors are protected from rather than impacted by exploratory drilling.

Carolyn Shafer, working to protect the water and the wildlife