

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

To Whom It May Concern:

I am writing to express deep concern about the proposed San Antonio Exploration Drilling Project and to request that the US Forest Service require an Environmental Assessment – and not allow a Categorical Exclusion. There is an extraordinary circumstance that should compel the more extensive Environmental Assessment as the proposed project site has at least one Federally Endangered species, the Yellow-Billed Cuckoo. Moreover, the Plan of Operations (PoO), and what is missing therein, raises a variety of concerns, outlined below.

Threatened and Endangered Species:

The PoO for this proposed project relies on old data, and therefore does not present an adequate picture of the risk posed to threatened and endangered species. For instance, the PoO cites a 2002 survey regarding the presence of the Sonoran Tiger Salamander, though a more recent survey was completed in 2018 by the State of AZ Game and Fish Department. Why is more recent data incorporated into the PoO? Likewise, the PoO states the Yellow-Billed Cuckoo are not present, which is a major omission given the Tucson Audubon's 2019 survey documenting their presence. Will the US Forest Service allow petitioners to select only the reports and data that are favorable to a Categorical Exclusion?

The PoO for such a project should include recent data, and it does not. This raises serious questions and more complete data presents the extraordinary circumstance – the presence of a Federally Endangered species – that should compel an Environmental Assessment for this project.

In addition to requiring careful study of the presence of the Federally Endangered species mentioned above, the Environmental Assessment should consider potential impacts on other species like the Mexican Spotted owl, Jaguar, Ocelot, Mexican Garter Snake, and others.

Public Safety:

The PoO does not make any mention of local human habitation or use of roads, though there are many local residents that live and commute in the proposed project area. Additionally, ranchers pull trailers along roads in the proposed project area, while tourists travel on these roads by car, on bike, and sometimes on foot. Also concerning, Border Patrol agents frequently use the nearby roads, often at high speeds, which could present safety issues.

What is perhaps most concerning is that Duquesne Road itself, proposed as a major access road, is quite curvy, with some drop-offs of a hundred feet or more on one side and rocky cliffs on the other. Moving industrial equipment along this route presents potential danger. This road also travels by the Little Red School where children and

teachers are crossing the road, presenting a potential further danger associated with increasing industrial traffic.

Have local residents, ranchers, tourist-related businesses, and school administrators been notified about potential public safety concerns and engaged in shaping the proposed project? Have county administrators been engaged to assess potential impacts more broadly?

WATER USAGE

The PoO proposes using water from Kino Springs. However, it does not indicate how much water will be drawn from the springs over the course of the project. Given the highly sensitive water table in the area, coupled with a recent, major drought and ongoing climate change, this should be a major area of concern. And, we know from prior local mining projects that drawdowns have the potential to deplete the water table in uneven and dramatic ways, possibly drying up local residential wells. Have local residents and county administrators been informed about potential water quality and quantity issues, and engaged in shaping the proposed project?

Since one of the principal purposes of the US Forest Service is to secure “favorable conditions of water flow,” I hope that the Environmental Assessment required of this project will include a careful investigation of water usage and broad potential impacts.

CULTURAL AND ARCHEOLOGICAL RESOURCES

Indigenous, historical, and cultural artifacts have been found in the areas toward and around Lochiel, and a full cultural and anthropological survey is needed. Have local tribes been contacted about impacts to ancestral lands and sites, and will they be engaged in a survey of the area and decision making about the proposed project?

CONCLUSION

The Forest Service must require an Environmental Assessment rather than a Categorical Exclusion to ensure that local residents and wildlife, along with tourists and other visitors to the area, are protected.

Thank you,

A handwritten signature in cursive script that reads "Shelley White".

Shelley White
PO Box 1095
Patagonia, AZ 85624