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Comments: The Proposed Plan of Operation seems to have cherry picked data to lend support to a CE status for the project. Where is the recent data on Yellow-billed Cuckoo or the Sonoran tiger Salamander? the data used is from 2002 when surveys have been conducted as recently as 2018. It seems clear that there is a need for the Forest Service to require an Environmental Assessment. An EA could avoid future litigation due to omission of data that could lead to a serious impact of the drilling project on Endangered Species.

There are other omissions in the PoO regarding water usage. There is no mention of the volume of water to be used, how it is to be transported or the impact it may have on Kino Springs.

Also, what about the road to the site? I've driven that road a number of times. it is narrow, steep in places with bends and sheer drop offs. I do not want to meet huge trucks and rigs on that road.

It seems to me that the Plan of Operation has not been thoroughly thought out. Or perhaps, the PoO text has omitted operations that might raise controversy.

We need to be certain that Endangered Species, cultural artifacts, and even human residents of the area, are protected from the San Antonio drilling project activities.

Thank you for the opportunity to comment on this project. I do hope you will take the project out of the CE Status, and require an Environmental Assessment. it will make us all feel better that we've not allowed a major disruptive activity to occur willy-nilly on this landscape without taking the time and making the effort to assure ourselves that impact on our most precious and endangered resources will be minimal, if not nil.

Doris A Rusch