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July 28, 2025

Raymond Suazo, Arizona State Director
BLM Arizona State Office
One North Central Ave., Suite 800
Phoenix, AZ 85004-4427

Bureau of Land Management - Safford Field Office
711 S 14th Ave
Safford, AZ 85546-3321

Re: Request for State Director Review and Petition for Stay of the Decision Record for Copper Creek Exploration Project (DOI-BLM-AZ-G010-2023-0003-EA)

Dear Mr. Suazo,

The Lower San Pedro Watershed Alliance (LSPWA), an all-volunteer conservation group based in Mammoth, Arizona, respectfully submits this Request for State Director Review and Petition for Stay of the June 30, 2025, Decision Record and associated Environmental Assessment and Finding of No Significant Impact (FONSI) for the Copper Creek Exploration Project.

We incorporate by reference all the points made in the Request for Review and Petition for Stay submitted by the San Carlos Apache Tribe, Center for Biological Diversity (CBD) and partners. This letter supplements the San Carlos Apache Tribe/CBD Petition by making additional points about LSPWA's direct experience with the Safford Field Office that you may not be aware of.

We were stunned to see that the Safford Field Office of the BLM rushed to approve its final EA and FONSI so quickly after receiving substantive comments and reports of significant impacts associated with greatly accelerating the pace of exploration drilling in the Copper Creek basin. The Safford Office's assertion that this major expansion of Redhawk's drilling operation will have no significant impacts is contradicted by the record of comments.

It is especially shocking that the Safford Office's FONSI decision took place within a month of Federal approval of a land swap in which the 7B Ranch, located at the base of the Copper Creek basin, is the primary property involved in the exchange for the sacred Oak Flat land that is planned for destruction by the expansion of the Resolution Mine. It is an insult to the San Carlos Apache Tribe and to the principles of responsible land-use planning to approve what was already a questionable land exchange and then immediately commence to accelerate the degradation of the 7B property.

Because of Copper Creek's remote location and the BLM's very limited field presence in the lower San Pedro watershed, local volunteer members of our organization have been the eyes and ears physically monitoring Redhawk's activities for many years. Unfortunately, our reports to the Safford Field Office

regarding violations on public lands in the Copper Creek basin have not been met with a spirit of collaboration. This has been a great disappointment to us. We work very hard to protect the ecological and cultural integrity of this watershed. We know that the Safford Field Office has limited resources and cannot afford to make the long trip to Mammoth area on a regular basis. We live here. We don't just drop in occasionally like some of the urban-based environmental groups. Our comments on resource conditions and reports of violations of laws, regulations, and other rules governing public land use are grounded in bona fide observations by knowledgeable individuals and warrant serious BLM attention.

Our comments in this letter focus on our experiences with the Safford Field Office regarding the Redhawk exploratory drilling operation and the arbitrary dismissal or discounting of substantive comments we made on the draft EA. Our conclusion remains the same as in our EA comments submitted on April 12, 2025 – we continue to insist that an Environmental Impact Statement is necessary in this ecologically and culturally sensitive sub-basin of the lower San Pedro watershed where a National Conservation designation is slated to be implemented for the 7B property.

Failure by the Safford Field Office to foster meaningful public participation

As noted in our comments on the draft EA, no public meetings were held by the BLM during the multiyear lead-up to the release of the draft EA. As a result, there were many gaps in the BLM's impact analyses and a systematic bias that favored the interests of the Applicant over conservation interests held by members of the public, including the local people who best know the project area. Outreach by Redhawk to promote their corporate plans is not a substitute for rigorous public outreach, engagement, and listening by the oversight agency, nor is it a substitute for government-to-government consultation with affected or interested Tribes.

The Safford Field Office did, during a 2023 Zoom meeting with collaborative stakeholders of the lower San Pedro, indicate that if members of the public observed problems with the Redhawk operation, they should report such problems to the BLM staff – a comment that was reiterated during the March 6, 2025 Zoom public meeting for the Environmental Assessment. Volunteer members of the LSPWA brought issues to the Safford Field Office over a year ago when they observed pre-permit drilling *on* public lands and directional drilling *under* public lands. This report was initially acknowledged by Safford BLM staff with the assurance it would be addressed. When asked how these apparent violations were addressed, no substantive response was provided. LSPWA board member Steve Marlatt then filed a Freedom of Information Act (FOIA) request with the BLM on July 15, 2024 to obtain the relevant communications by staff members of the Safford BLM Office and Redhawk. Other than receiving acknowledgment receipt of the FOIA request, the LSPWA has received no response, which is, itself, a violation of FOIA regulations.

We documented this year-long failure of the Safford Office to provide a FOIA response in our comments on the draft EA and have yet to receive BLM's response to that comment.

With no record of accountability for apparent pre-permit violations last year, our members subsequently observed that road-widening activities were initiated before the Safford Office issued its June 30, 2025 permit decision. Members first observed this on June 18, 2025 and conversed with the heavy equipment operator. By June 22, members noted that roads had been widened adjacent to an area where a Mexican spotted owl has been documented multiple times, over multiple years, on camera. As of this letter's posting, the Safford Field Office has not responded to an LSPWA member's email requesting details of this road-expansion activity on public lands. Reports of pre-permit violations are significant and should be taken seriously, particularly since the BLM has such limited presence in the Copper Creek sub-basin

and depends on the credibility and compliance record of Redhawk for reporting on a wide range of monitoring issues.

We encourage the State director to review pages 16 through 22 of our comments on the draft EA [<http://bit.ly/3ILN8wr>] for the Redhawk project, regarding the Safford BLM Office's lack of public outreach, lax oversight, and unresponsiveness to public reports and inquiries, including an email request from LSPWA chair Melissa Crytzer Fry for a missing Biological Evaluation in the final EA documents that remains unanswered.

Lack of outreach for meaningful public participation led to an incomplete and incorrect EA process and a FONSI unsupported by evidence and analysis

Please note that the last eight pages of Appendix G in the final EA fail to address each of our substantive comments, instead opting to "lump and respond" with single and incomplete answers to multiple comments.

As a result, many of our substantive comments are capriciously ignored (especially in our Comment Appendix), including, but not limited to, our comments on:

- the lack of response to the previously mentioned FOIA request
- the continued failure to acknowledge that the Mexican spotted owl is present in the project area
- the probable illegal use of private wells by Redhawk (as documented in Appendix 4B of our comments)
- the conflict of interest in assigning Redhawk as the primary reporter of on-site environmental impacts
- Redhawk's prior history of drilling 163 exploration holes over an 18-year period with no environmental review (probable illegal segmentation of NOI permits and possibly some drilling that took place with no applicable permit)
- Redhawk's history of disturbing public lands before a permit had been issued
- the insufficiency of once-per-year site monitoring of Redhawk compliance by the BLM
- failure to acknowledge the existence of the Desert Purple Martin nesting area
- failure to provide relevant hydrological data related to proposed water extraction in the Copper Creek sub-basin (including Redhawk's pumping of water near the San Pedro River).

LSPWA also commented on the inadequate consultation with the San Carlos Apache Tribe; Redhawk's inappropriate use of the NEPA process as a marketing tool for future, full-scale mining operations; the incompletely analyzed and disclosed cumulative impacts of Redhawk's drilling operations (including nocturnal drilling); untimely baseline studies; and impacts to the ecology and land exchange value of the 7B Ranch property, which were treated in a rushed and dismissive manner.

Lax oversight, a blatant and continuing violation of the Freedom of Information Act, and the critical absence of meaningful responses to public comments resulted in a rushed EA review process that was expedited to reach a foregone conclusion. This violates the Administrative Procedures Act.

Petition for Stay


This is not an ordinary exploratory drilling situation where an applicant is making an initial assessment of mineral availability. Redhawk has been doing initial assessments for 18 years, with a questionable record of permit legitimacy, and has now made it clear through their aggressive marketing campaign that a major mining operation is a Reasonably Foreseeable Future Action (RFFA). This RFFA must be considered in an Environmental Impact Statement.

This situation also involves a major Federal land swap in which the very land being exchanged for the Oak Flat site (a sacred site that is planned to be destroyed by one mining operation) is now proposed to be rapidly degraded by another mining operation, an intensive 24-hour-per-day exploratory drilling operation. The balance of interests must consider long-term conservation interests in addition to the relatively short-term boom-and-bust economic interests of the foreign corporation making this proposal:

1. If this Petition for Stay is not granted, the ecological and cultural value of the Copper Creek basin and the planned National Conservation Area at the base of this basin will be severely degraded by the accelerated 24-hour-per-day exploratory drilling operation and would be destroyed by the reasonably foreseeable future action of a 28-square-mile mining operation openly being promoted by Redhawk at public meetings and through the media.
2. Due to the ongoing violations of Federal law, there is a high probability of success on the merits of the arguments made herein and in the CBD Petition.
3. If the Stay is not granted, the ecological and cultural harms to the Copper Creek basin and surrounding area that were already initiated on June 18 will continue to become increasingly irreparable; the value and ecological connectivity of the 7B land exchange parcel will be degraded in an accelerated manner; and the violations of Federal law will continue.
4. The public interest, heretofore ignored or dismissed in deference to the economic interests of a foreign mining corporation, favors the initiation of an Environmental Impact Statement process to assess the long-term impacts of the proposed accelerated exploratory drilling operation, the associated Reasonably Foreseeable Future Actions, and the cumulative effects.

The Safford BLM Office's Finding of No Significant Impacts is not supported. The rigor of an EIS process is necessary in this complex and high-stakes situation.

Respectfully submitted,



Melissa Crytzer Fry, Chairperson

On behalf of the Lower San Pedro Watershed Alliance