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Organization:

Title:

Comments: I have lived in the beautiful area of the Patagonia Mountains since 1999. I moved to this area because of its natural beauty, its clean air, its water, its land, its wildlife, and especially because of the people who live here and consciously work to co-create a thriving community. I currently live at 249 Duquesne Avenue within the Patagonia town limits. I now own and operate a business in Patagonia - a local artists consignment gallery.

My college degree is in business management and my [ldquo]typical[rdquo] career years included successful management of law firms, construction companies, and a charter public school. For about 12 years, I co-owned and operated power line construction companies (one in FL and one in AZ) as well as a directional drilling company and the client list included mining companies. For five years, I held mining claims in Flux Canyon and extracted turquoise.

As you read my comments as well as all comments that the Forest Service receives, please remember that the given population of the area impacted is relatively small. The 2012 Census Data gives a population of 1,416 in the 85624 zip code and a population of 46,351 in Sierra Vista. So each comment from this area is the equivalent of 33 comments from the Sierra Vista area based on percentage of the population. 50 Patagonia comments would be the equivalent of 1,650 comments from Sierra Vista. And certainly it is the relevancy of the comments that matter not the quantity?

Extraordinary Circumstances

* There are many Federally threatened and endangered species in the Patagonia Mountains. Cause-effect relationship: the proposed drilling operation will dramatically and irretrievably disturb all species.

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* The stated source for this project[rsquo]s water is AMI[rsquo]s existing water well and projected to be 20,000 gallons of water per week. This water will come from a municipal watershed. Given extreme and long term drought conditions, it is foolhardy to divert water from the community for an exploratory commercial project. Cause-effect relationship: the proposed drilling operation will dramatically and negatively impact the municipal watershed.

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* The area needs to be evaluated by an archeologist. Cause-effect relationship: destruction of historical artifacts.36 CFR 220.6 (c): [ldquo]If the responsible official determines, based on scoping, that it is uncertain

whether the proposed action may have a significant effect on the environment, prepare an EA. If the responsible official determines, based on scoping, that the proposed action may have a significant environmental effect, prepare an EIS.[rdquo] The following issues need to be addressed:

Water Quality and Water Quantity: It is well known that the Patagonia Mountains have a history of mining activity. And the area[rsquo]s water reflects the destructive nature of mining activities. That can not be allowed to happen again. This area is experiencing prolonged and extreme drought and severe drought is forecasted into the long term future. I also have concerns about the use of proposed drilling muds: while a natural material, it is the nature of these muds to absorb up to 16 times their weight in water! A community[rsquo]s water supply is the most vital component of its well being. The quality and quantity of our water must not be compromised. AMI contractors have stated that acid mine drainage (a/k/a mine influenced water) is being reused for drilling operations on its patented lands. This reuse of acid mine drainage should be banned. There is [ldquo]no action alternative[rdquo] to protecting our water quality and quantity.

Air Quality: There are federal agencies reporting that the air quality in the Patagonia area has been declining. This must be reversed. All mining activities (exploratory or otherwise) will have a negative impact on air quality. There is [ldquo]no action alternative[rdquo] to protecting the vital air that we breathe into our bodies.

Soils: This area is increasing its local food production. Mining activities will expose toxic materials that are likely to leach into the soils of outlying areas through air and water migration.

Vegetation and Wildlife: This area is becoming known in the scientific community as well as the eco-tourism community as a unique area of great biological diversity. The Patagonia Mountains must be both protected and receive pro-active stewardship.

Threatened and Endangered Species: There is an extensive list of threatened and endangered species. Mitigation is unacceptable. There is [ldquo]no action alternative[rdquo] to protecting these species.

Wildlife Corridors / Wildlife Movement: The Patagonia Mountains are a significant corridor for wildlife movement and one of the few remaining long range corridors. There is [ldquo]no action alternative[rdquo] to disrupting this corridor.

Cultural Resources: It has been a privilege in my lifetime and my experience in this area to have found numerous artifacts that evidence the occupation of ancient peoples in this area. All efforts must be made to identify and protect these cultural resources.

Visual Resources and Scenic Values: When I first moved to this area, I was overwhelmed with the beauty of the vistas. And all these many years later, I remain overwhelmed with the natural beauty. Scarring the land with the remains of exploratory drilling == and unimaginable, with actual mining activities == is unacceptable and detrimental to the quality of life experienced by humans and wildlife.

Dark Skies: Everyone who visits this area comments on the ability to see the beauty of the night skies. What impact will 24/7 exploratory drilling have upon this community benefit?

Recreation: This area is regularly and increasingly visited by outdoor enthusiasts who hike the Arizona Trail, visit the Nature Conservancy, visit health & wellness centers as well as dude ranches, bicycle, horse back ride, walk & enjoy the natural world, etc. Even short-term exploratory drilling will impact these opportunities. AMI has demonstrated its obstruction to recreational use by blocking a long-standing access through its private land.

Public Safety: This area is currently a [ldquo]walking town.[rdquo] And those who walk include the very young and the very old. The amount of proposed (cumulative especially) truck traffic on Harshaw Road will create a major public safety hazard.

Transportation: 24/7 operations will create a nightmare of traffic, noise and pollution on our roadways.

Socio-Economic Effects: As a local business owner, I am acutely aware of the reasons visitors travel to the Patagonia Mountains. A significant percentage of the clientele are from other states and from outside the USA. They come here for the natural environment including the wildlife (plants and animals). Recent studies have indicated that more than 50% of local revenues will be lost if the landscapes are destroyed. And it is also likely that 50% of existing jobs held by local people will disappear. The cumulative effect of all proposed activities occurring on approximately 26,000 acres of FS lands immediately outside the Town of Patagonia WILL have a significant detrimental effect.

Cumulative Effects: Currently, cumulative effects include exploratory drilling by AMI on its patented land, abandoned leaking mines throughout the area, the voluntary remediation program for the January adit as well as the Lead Queen Mine remediation. The Patagonia Mountains are experiencing significant interest from various mining companies and the cumulative impact of these projects MUST BE considered. Additional cumulative effects in the Coronado National Forest area impacted by these proposed activities are existing land leases and increasing activity by Federal agencies such as Border Patrol and Customs. USGS recently announced a pilot project as its response to legacy mining contamination with these objectives:

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1. Determine the immediate extent, levels, and fate of contaminants released from the Lead Queen and Trench Camp mine site spills; characterize current and long term fluxes/impacts of the events to sensitive areas such as Harshaw and Sonoita Creeks downstream of the recent spill.
2. Determine the fate of contaminants within the Sonoita Creek and Pe[n]tilde]a Blanca, AZ watersheds and their associated ecosystems.
3. Identify contaminant risk potential of legacy and proposed mine sites in the Santa Rita, Atacosa, and Patagonia Mountains and develop classification criteria for predicting vulnerabilities and targeted sinks of metal contaminants.
4. Compile geo-hydrologic data on pertinent lithologies, faults and associated fracture networks that might transmit groundwater from the naturally occurring pyrite wall rock of the deposit, or leaking discharges from the mine's tailings impoundment.
5. Develop guidelines for future responses that effectively leverage the limited finances of the Mineral Resources Program, State, and other federal agency response mechanisms. Response guidelines will include financing considerations of deploying a 'Response-Ready' team and equipment, developing sampling protocols and objectives, and delivering fast, efficient, reviewed communication of data to land management and regulatory partners as well as the general public.
6. Develop communications protocols for quick release of pertinent preliminary information to the collaborating agencies and public.

It seems prudent to await the results of this project before considering any additional mining activity on public lands.

Climate Change: Under NEPA, Federal agencies are required to consider and disclose the potential effects of their actions and decisions on the environment. For the most significant actions, agencies must prepare an [ldquo]Environmental Impact Statement[rdquo] detailing the consequences of the project and how negative impacts could be avoided or mitigated through alternative approaches. The new guidance will ask agencies to incorporate climate change into these reviews and assessments. Specifically, the guidance directs agencies to:

* Consider both the immediate and the longer-term effects of their decisions on climate change

- * Attempt to quantify the climate impacts of their decisions, including by providing useful approximations of direct and indirect emissions
 - * Assess not only how their actions may contribute to climate change but also how climate change impacts, such as sea rise or drought, might affect a proposed project
 - * Consider alternative approaches that could help to better prepare the U.S. for a warming climate
- With respect to quantification, the guidance recommends that agencies quantify a proposed action's projected direct and indirect GHG emissions and steers agencies towards established tools and processes to do so. Direct emissions would involve calculating how many carbon dioxide emissions a new project, permit or other agency action would cause, as well as how much carbon it could sequester. Indirect emissions refer to the emissions that may not immediately result from the project but would be a reasonably foreseeable result down the line.
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Reclamation: How will mud pits be compacted to assure no sinking of earth? Require a certified permaculture expert water harvesting design be implemented in order to meet the Forest Service's mandate to study and develop methods for reclamation of mined land and to lessen adverse impacts on the physical environment that may result from mining activities. The Project Plan of Operations mentions that the bond calculation is attached, but it is not attached. What is the proposed amount? This project should require a significant bond security in the form of unconditionally guaranteed negotiable Treasury bills and notes or cash.

Monitoring/Inspections: How will the Forest Service monitor the activity? It is suggested that the Forest Service choose an independent monitoring agency (or multiple agencies) to monitor all activities. Such agency would report only to the Forest Service and such services would be paid by AMI.

And: This proposed activity will have a major impact on our land, our wildlife, our water, our human occupants and our community. I understand that the Forest Service has a specific mandate to making mining happen. I also know that the Forest Service is required to protect the environment. I look forward to the Forest Service demonstrating its protection mandate.

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