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Organization:

Title:

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United States Forest Service

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Attention: Minerals and Geology Staff Re: Hermosa-Taylor

I, Stuart H. Brody, am a resident of the Patagonia area in Arizona and for my comment on the proposed Hermosa-Taylor Drilling Project, state as follows.

1. I have owned a home at Lake Patagonia, seven miles south of the Town of Patagonia for twenty years and have been a full time resident since 2014,.

2. Patagonia is the center of my recreation, business and community activity, as well as my personal relationships. In my view the proposed project poses many questions about the impacts on the community and the quality of my own engagement with the community that require the most exhaustive investigation of impacts, the EIS.

3. I bought my house twenty years ago and moved here permanently for the quality of life. This has already been adversely impacted by the current mining activity.

Let's start with the scenic disruption. This is one of the most beautiful areas in the country and certainly in Arizona. The bio diversity and ecological richness makes it well-known worldwide. I often hike the back country off of Harshaw Road and climb the mountains there. From any significant height, you can see the clear cutting, the roads carved into the mountain, the drilling rigs dotting the entire territory huge piles of tailings and even disgusting scum caused by mine leakage.

For instance, a few weeks ago, while hiking Red Mountain I came across large puffs of white plastic smelling scum in the wash leading to the trail, allegedly from breach of the Lead Queen mine. Although I understand this project must be viewed separately from that one, the point is that without a through investigation into the impact of this project, combined with the existing disruptions of the previous and continuing mining operations, this project poses a significant risk of aggregating utterly unacceptable scenic impacts on this special area. Assurances that appropriate mitigation steps be implemented can only be made after the through investigation that only an EIS can provide. Without it, we, the residents will continue to have anxiety about the way mining is conducted and remediation respected.

4. Beyond this impact on my favorite pastime, it is also clear that the impact of this mine had divided our small community seriously. Although such controversy might be expected, it has been exacerbated by the continuing revelations about leaking and inadequate remediation. What guarantees do we have that these will not also occur with regard to this project. An example of the divisions caused by this activity occurred several weeks ago when the Town was confronted with the failure of Arizona Minerals to pay, as required by Town ordinance, the fee for the overweight trucks it uses to haul water, the weight of which causes stress on town roads. In an inexplicable and irresponsible denial of responsibility under the ordinance, and the patent danger to town roads by such excessive weight, Arizona Minerals tried to divert attention from its illegal and unethical action and brought in outsiders to populate the Town meeting and disrupt it. My point here is not to argue the merits of that action, although any objective analysis would reveal a complete denigration of the law, but to assert that without an Environmental Impact Statement, and the thoroughness that it requires, the Town will continue to be plunged into this level of

division and controversy at every step as the mining activity inevitably entails significant impacts that such a small town cannot sustain.

5. Speaking of water, it is apparent that prior activity has been undertaken, and this activity has been proposed, without regard to the potentially significant impacts on the watershed. Before I moved here permanently, I was ethics officer for the Department of Environmental Conservation of the State of New York. Although I was not involved in the substantive work of the Agency, I observed my technical colleagues labor over the extraordinary and surprising impacts of fracking. As you know New York placed a moratorium on that activity because the impacts of that drilling were insufficiently predictable.

Clearly, the same is true here. Without an Environmental Impact Statement and the thoroughness it requires, Arizona Minerals essentially proposes drilling without sufficient scientific understanding and empirical documentation of the impacts on the watershed both temporarily and long term. The sustenance of my own home, miles away could be affected. Even if Arizona Minerals dismisses such concerns for why should it matter to them-it is the responsibility of the Forest Service to be absolutely certain that the drilling will not deprive residents of their water for both personal and business uses. This aspect takes on specific significance in light of the fact that there has been substantial mining activity in the past in this area and a vast matrix of tunnels. An EIS is necessary to assure that the interaction of the proposed drilling with those existing fissures will not result in untoward and unpredictable impacts on the watershed upon which the residents depend.

6. In Par 2 I mentioned that my business activity is conducted in Patagonia. I am a consultant in ethics and integrity training and Patagonia is my base. I write a column for the local paper and in that sense I conduct business, or a vital aspect of

my business here. Others are more equipped to discuss the overall impact upon local business but I can cite this. One of the area's largest employers, the Tree of Life Center US, which has attracted thousands of clients from over 120 countries from around the world, is dependent on a serene and peaceful environment in which Dr. Cousens conducts, with remarkable success, his revolutionary treatments for diabetes, depression, nutritional ailments, and other constitutional afflictions. It is not hard to imagine-and it is certainly the Forest Service's responsibility to determine-the significant impact on this world-class healing center as loud and heavy trucks run through Harshaw Road, the locus of the Rejuvenation Center. The loss of this institution would be devastating. Against the significance of the impact on this institution and the other healing-based activities in the Town, the hollow claims of the mining company that mining would bring employment must be measured. An EIS is necessary to analyze the impact of this proposed project on the vital touristic and health-related businesses conducted in Patagonia. Of course, the purpose of the proposed drilling would be to set the stage for wider mining activities which would undoubtedly have devastating, prolonged and irreparable impact upon the business and touristic structure that now exists in Patagonia. These effects, in so far as they show signs of manifestation even in the proposed drilling, and the cumulative effect of this proposal with existing projects require an EIS.

7. I should also mention that before I moved permanently to Patagonia, I lived in the Adirondacks of New York, near Lake Placid and watched the steady erosion of the economic stability of the local population as large and financially well-backed interests began to take over the area. The significance of this experience lies in the likelihood that should mining commence-after all, why would this project be undertaken if not to anticipate large scale mining-then the impact on the home

values and economic stability of such a small area could be significantly and permanently disrupted. This is another reason why a more expansive Environmental Impact Statement is required.

8. Further, past activity by Arizona Minerals reveals that they have consistently underestimated the duration of their proposed project explorations. Accordingly, a significant impact of this proposal is the likely duration of it, despite the incredible assertions of the company.

9. On another personal note, I have found in the Patagonia mountains and surrounding wilderness, the thrill and excitement in learning of the majestic jaguar and its unique habitat in our region. I am not a botanist but I have made this a hobby. There is no way that the corridor so vital to the survival of this lovely and rare beast would not be disrupted by ecological incursions of the proposed activity, particularly in combination and cumulative impact of prior and existing activity. An EIS is necessary to understand and to ensure the survival of this community.

10. In short, I believe the Forest Service, endeavoring to assess the significance of the proposed action, must consider the foregoing: the unique geographic area and the importance of preserving it for scenic and touristic purposes, the controversy stirred by the action upon a small population whose very future depends on the assertion of federal stewardship here, the precious water resources, the impacts on which must be thoroughly understood before any activity should be undertaken, the significant impact on the jaguar and endangered species, the demonstrable impact on the health-centric nature of the businesses of the Patagonia community and the cumulative impact of this proposed action with others that have already damaged these criticalities of town life.

Sincere,

Stuart H. Brody

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