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First name: Carole

Last name: BROADFOOT

Organization:

Title:

Comments: Sunnyside Exploration Drilling Project

My husband and I lived in the Northeast most of our lives. For about 25 years we lived in the Village of Lake Placid, N.Y. surrounded by mountains. Lake Placid is located in the 6 million acre Adirondack Park in upstate New York. "[T]he Adirondack Park contains the largest protected wilderness area east of the Mississippi." Retrieved from <https://visitadirondacks.com/about/adirondack-park> We decided that we were done with the snow and cold so we moved to Patagonia, another town surrounded by beautiful mountains and is ranked as one of the top 5 biodiverse areas in the world. After living in Patagonia for a few months we learned about the mines and the negative impact they have had on the environment. You can imagine how we felt after living many years in the protected Adirondack Park. It was hard to understand why anyone would want to disturb the mountains.

One of my concerns is about the use of the word "feasible" in the document titled, "Public Scoping Open House, Sunnyside Exploration Drilling Project Environmental Assessment." On the front page of the pamphlet it states "The Forest Service's purpose is . . . to ensure operations would be conducted to minimize adverse environmental impacts . . . where feasible." And on page 3 it restates a similar sentence : "The Forest Service is required . . . to ensure operations would be conducted so as to minimize adverse environmental impacts on . . . surface resources (where feasible) . . . "

What criteria is used to determine feasibility?

Who decides what is or what isn't feasible? Is it a committee consisting of members of the Forest Service and other environmental experts?

The following are questions I have about the reclamation process:

1. Sunnyside Exploration Drilling Project will be responsible for the reclamation of the land that was disturbed during the exploration. What happens if the claim is sold before reclamation is started or completed? Does the new owner automatically take on the responsibility of the reclamation?
2. It is my understanding that the Forest Service can reduce the cost of reclamation for the mining company if the company claims that the cost is too high. We all know that companies usually underestimate the cost of projects. Why doesn't Sunnyside plan to overestimate the cost of reclamation and post a bond in escrow until reclamation is completed?

The following states other concerns:

"1. Cumulative impacts clearly exist in the Patagonia Mountains due to multiple proposed mining projects and, therefore, this reason alone should require an EIS. The cumulative impacts include, but are not limited to:

Abandoned leaking mines

Other Mining Company Activity

Cattle Grazing

Border Patrol

Recreation Activity

2. Wildlife

The proposed project will take place in a Mexican Spotted Owl Protected Activity Center. Cause-effect relationship: the proposed drilling operation will dramatically and irretrievably disturb the owls.

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.

The Patagonia Mountains are a significant corridor for wildlife movement and one of the few remaining long range corridors. There is "no action alternative" to disrupting this corridor.

3. Water Quality and Water Quantity: There is "no action alternative" to protecting our water quality and quantity. This Plan of Operations proposes to truck in water from other "confirmed" sources. All those "confirmed" sources are upstream or downstream of this project. All watersheds are connected.

A comprehensive study should be conducted of the entire groundwater system throughout Santa Cruz County because there is significant science on changing water conditions due to ongoing drought with all science indicating worsening conditions for the foreseeable future.

This project will occur in a Forest Service designated Municipal Watershed (Town of Patagonia).

4. 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 "no action alternative" to protecting the vital air that we breathe into our bodies.

5. 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.

6. Cultural Resources: The Patagonia Mountains are known to have been inhabited for more than 10,000 years. All efforts must be made to identify and protect these cultural resources.

7. Dark Skies: Everyone who visits this area comments on the beauty of the dark skies. What impact will 24/7 operations have upon this recreational activity?

8. Road Disturbance: This level of road disturbance in an area with multiple endangered species and designated protected areas is unacceptable." Retrieved from <https://www.patagoniaalliance.org>