Data Submitted (UTC 11): 10/19/2020 12:43:03 AM

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Title:

Comments: Dear Mr. Goshen,

I am commenting on this proposed project as a Bisbee resident who spends a good amount of time advocating for the water and wildlife of the Patagonia Mountains. In fact, I just this weekend drove across the San Rafael Valley, through Lochiel, and right by the area where the San Antonio project is proposed.

As a science writer and journalist with a background in communications and scientific studies, I am deeply concerned about this proposed project and request that the Forest Service does NOT allow it to continue as a Categorical Exclusion. To the contrary, I believe this project needs an environmental analysis before it can proceed. Here are the reasons why I request this:

- 1) The area proposed for exploratory drilling is well-known Yellow-Billed Cuckoo habitat, a species that the U.S. Fish and Wildlife recently decided should retain its Federally protected status under the Endangered Species Act. However, the Plan of Operations does not take this into consideration, nor does it list recent studies (like the one attached) for the Yellow-Billed Cuckoo. In any scientific study, scientists and researchers understand that old data alone cannot be used when trying to prove something. Instead, a thorough literature review must be done, citing old and new research. Please see an attached newer study for a better understanding of the data we have on Yellow-Billed Cuckoos.
- 2) Human safety is also an issue with this project. In the Plan of Operations, no mention is made of how the local communities in the area will be impacted by this exploratory drilling. Why are local community impacts left out of this PoO? Having just driven the proposed traffic route for this project, I fail to see how mining traffic could go down this road safely, as many parts of the road are used by tourists, Border Patrol, ranchers, recreationists, and students, and many portions of the road are narrow and don't easily allow two cars to pass each other. Please consult with and inform these communities on the impacts this project proposes to their health, safety, and wellness.
- 3) The Plan of Operations does not state how much water will be used over the course of this project. With this area being in a severe drought, our watershed contains precious water that is much needed by the area's residents, ranchers, and farmers. How much water will be used in this project, and can the mining company ENSURE that this use will not impact locals and wildlife? This is especially important for us to know as the Forest Service lists the local watershed as "functioning at risk."

We also have a problem with flooding mines in the area, many of which have produced highly acidic mine drainage that affects our watershed, rivers, streams, and local wells. How will the mining company ensure that acid mine drainage won't be an issue after they are done with their exploratory drilling?

I request that the Forest Service require an Environmental Assessment for the San Antonio Exploratory Drilling proposal filed by IC Exploration before any work is allowed to be done. This area is a hotspot for biodiversity; many humans, plants, and animals rely on this area for survival and much more. It is the Forest Service's duty to ensure no harm come to people or the public land which we all have a stake in.

Thank you for the opportunity to comment on this project.