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First name: Jim

Last name: Stratton

Organization:

Title:

Comments: Richard Goshen

Project Contact

Coronado National Forest

USDA Forest Service

Mr. Goshen,

I am writing today to urge you to prepare an Environmental Assessment on the proposed San Antonio Exploration Drilling Project (#58629). It is currently being reviewed as a CatEx and I believe that to be an incorrect determination. There certainly are extraordinary circumstances that bump this project into requiring review in an Environmental Assessment.

While there are only 5 test sites proposed in the Plan of Operations submitted by IC Exploration, the entire project site is 651 acres and should these tests result in moving forward with development of a mining operation, it would certainly rise to the level of needing an Environmental Impact Statement. This could become another big project. The possibility of this area becoming yet another mine in a region of SE Arizona that is already fraught with public concerns about impacts from other proposed mines in, and of itself, should require you to pay more attention to this process. Even at this early stage. Public concern is very heightened by all the proposed mining around the Patagonia Mountains and that should make this proposed exploration project rise to being an extraordinary circumstance. Moving forward with a CatEx is just pouring gasoline on an already burning fire of concern and opposition to mines in the area. You cannot ignore the public concern about where this exploration could lead. You need to address that concern with a more transparent review of the potential impacts. That means an EA.

I see from the maps included in the Plan of Operations that two of the test holes overlap with critical jaguar habitat. Enough said. There are ESA concerns here and you cannot simply brush them off with a CatEx. I also understand that there is newer data relating to the Sonoran Tiger Salamander that has not been included in the documents under review. Similarly, recent observational data about the Yellow-billed Cuckoo has also been omitted from the proposal. It is clear in the Forest Service policies for preparing environmental reviews that ESA concerns automatically bump this project into needing an EA. A CatEx is simply not allowed.

Preparation of an EA would allow the Forest Service to ensure that all the other users of this area would be adequately notified of what's going on here. Local ranchers, border patrol, birders, cyclists, campers and other recreators using this area need to fully understand what is being proposed and how this proposal could impact their recreational, economic and public safety needs. An EA would ensure this. A CatEx sweeps it under the table.

Please reconsider your decision to authorize this project with a CatEx. Public anxiety about mining in the Patagonia Mountains, clear ESA concerns and the need to ensure that all the other users of our public national forest lands are in the loop require a more thorough investigation of the impacts of this project. An EA is required.

Thank You.

Jim Stratton

Patagonia, AZ

