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Comments: Dear Mr. Goshen,

Please accept my comment on the proposed San Antonio Exploration Drilling Project. Upfront, let me state my very deep concern for the project and for proposed possibility of it moving forward with a Categorical Exclusion. This is a devastating idea, unfair and improper on many levels, and should unequivocally not be the course of action. Rather, the only correct course of action is to complete a full Environmental Assessment as it seems clear should be the case before this project is allowed to continue forward.

I am commenting as a current resident in the Patagonia area, a university professor, and a person who has spent time learning about and assessing this proposal.

The project cannot have a Categorical Exclusion and must have an Environmental Assessment because:

1)Wildlife and Endangered Species: Birds are an essential part of our ecosystem, an immeasurable part of the local economy, and our responsibility to protect. The area being proposed for exploratory drilling is a documented Yellow-Billed Cuckoo habitat. This is a species that is currently- and has been for some time- protected federally under the Endangered Species Act. The current exploratory drilling plan does not take this protected species into consideration and does not refer to the scientific studies (such as the 2019 study conducted by the Tucson Audubon Society) that cause deep concern for any drilling project. At best, the proposal refers to older studies, with clear intention to exclude any of the studies that illustrate the fact of need for a full Environmental Assessment. Likewise, the Sonoran Tiger Salmon may well be put at risk with this Exploratory Drilling Project, and again the current proposal for Categorical Exclusion neglects to look at the scientific studies that are cause for concern.

With endangered species in the area, why wouldn't a full Environmental Assessment be undertaken?

Why does the proposal intentionally leave out more current studies? Only include references to the studies that support their claims but intentionally exclude those scientific studies that don't?

2)Risks to People, Neighborhoods, and Children: It is essential to care for the people who live in this region, including those who will be directly impacted by the access road and the exploratory drilling project. It is almost beyond comprehension- but also says a great deal about the inadequacy of the plan and the lack of true concern from those proposing it- that the Plan of Operations makes no mention of how the local community will be impacted by the proposed drilling. There is a school along this path and there is potential for safety risks to the children, their parents, the teachers, and all who are involved in the school. Similarly so, there is potential danger for those traveling along the main road- often at higher speeds (legal speeds, of course)- to have large trucks entering and exiting along this way. And note that Duquesne Road- proposed as a major access road- is filled with curves, has large drop offs even up to 100 ft, and rocky cliffs along the road's edge.

What will be the effect on the children and community members of the school along the path?

What might be risky and potentially dangerous outcomes along both the side roads and the main road?

Has there been a full effort to involve local community members who will be most affected, along with local administrators, in the process of assessing potential impacts?

Where is a full assessment of all of this, and how can a Categorical Exclusion possibly be granted without such full assessment?

3)Issues With Water: We live in a region always on edge about having enough and proper water, and we have now been in an extended severe drought this year. The Plan of Operations for this project does not include how much water will be used. It also doesn't address whether (and how) the mining company can ensure the area's

residents, ranchers, businesses, and tourists that whatever the water use is determined to be (again, unstated as of now) will not impact negatively people and wildlife.

Why isn't there a water usage estimate?

Why aren't there assurances that the people and wildlife in this area will have proper water?

Why isn't there a full assessment of acid mine drainage and the impact it will have on the water? What is the full plan regarding the acidic mining dripoff after the project is completed and the community still has potential issues with our water?

Thank you for allowing me to comment. I believe it would be highly irresponsible and potentially truly detrimental for the Forest Service to take any action other than to require a full Environmental Assessment for the San Antonio Exploratory Drilling proposal filed by IC Exploration before any work at all is allowed to be done. This region is incredibly important for biodiversity, is home to a natural wildlife corridor, and is the home and vacation spot for many people. Furthermore, it is the responsibility and duty of the Forest Service's to ensure that the public lands be protected with no harm to people. It is essential that absolutely no Categorical Exclusion is granted and that the Forest Service orders a full Environmental Assessment.

Thank you,

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