# I am writing to request that the MPO for the **Hermosa Critical Minerals Project #65668** not be approved and that Coronado National Forest be mandated to research and write a more detailed Environmental Impact Statement because of potentially significant impacts not satisfactorily addressed in the cursory Environmental Assessment. While the examples I give of tangible impacts on adjacent properties are local and detailed in scope, further expansion of South32’s activities may allow the project to generate a few site-specific impacts, but ones with more widespread consequences on society at large. As a resident of Patagonia whose property is immediately adjacent to the land it bought north and east of Patagonia town limits for its Cross Creek Connection access road for heavy truck traffic, I have personally witnessed the initial impacts to which I speak. There are three tangible indicators that significant impacts have already been generated by South32, with little indication of the firm changing course once these generated impacts were initially reported to South32 and to the county. The three potentially significant concerns already generating ripple effects are as follows:

# **Environmental impacts on properties adjacent to South32 truck routes out of Coronado National Value that potentially threaten to diminish the property value of adjacent holdings of residents, non-profits, and small businesses**:To offer South32’slack of sensitivity to adjacent property owners, let me use its construction of an access road north and east of Patagonia’s town limits, on land it purchased because the town council voted not to let additional heavy truck traffic on its own roads to reach the Coronado National Forest area. Since South32 and Hunter’s construction began there, adjacent property owners have suffered from truck traffic and alarms and honking as early as 6:45 am in the morning; from flooding and sedimentation of their properties from runoff generated by South32 and Hunter blading a 75 foot to 100 foot swath across was is proposed to be a county park; increased presence of invasive exotic, the Russian thistle tumbleweed along its road right of way within 50 years of two native plant nurseries; and turbidity impacts on animal movements in and to a pond designated by US Fish and Wildlife Service as a Partners in Wildlife safe harbor for federally listed Gila topminnows and desert pupfish. An estimated 3000 mesquite trees were destroyed blading an excessively wide right of way for South32 truck traffic, yet the company’s plans did not include replanting (to date) a single tree for soil erosion control, carbon sequestration to offset climate change, noise abatement or dust abatement.

1. **Signi,ficant failure to adequately surveys and consult with Tohono O’odham and New Pascua Yaqui regarding sacred plants and sacred sites whose public access is guaranteed by the US Constitutions’ protection of the freedom to** Constitutionally-guaranteed right to practice religious freedom for worshippers of all faiths, not just for those Indigenous people whose rights are also protected by AIRFA. Because of the known presence **practice one’s religion or spiritual tradition.** There has been inadequate effort by the Forest Service and the mine’s environmental consultants to identify, survey and provide access to specific populations of sacred plants and sites in the affected area of Coronado National Forest. Access to such plants and sites is a of at least two rare plants with a history of ethnographically-documented or archaeologically-inferred spiritual use- Amsonia grandiflora ‘Corona de Cristo’ and Agave parviflora ‘the Santa Cruz striped agave’—the Forest Service is mandated by MOUs to give special attention to such plants. They are known grow in and near Flux Canyon and the southern Patagonias, but to my knowledge, there have been no cultural consultations about them to date. The Forest Service must tangibly demonstrate is protecting such cultural resources from harm as required by federal law. Both Sobaipuri O’odham and Yaqui have place names and historic sites between the Nogales-Tumacacori corridor and the Nogales- Sonia corridor, but the impact of this project on their heritage has not been adequately assessed and this is a significant failure.
2. **Tangible preliminary indicators that the recent presence of the mine and its increased truck traffic in Patagonia are affecting the place-based restorative economy and ecotourism, while discouraging potential new residents for settling in Patagonia, and forcing existing residents to consider moving elsewhere.** To date, the mine has failed to buffer Patagonia’s placed based restorative economy and ecotourism businesses from being diminished by its activities. Its wildcat subcontractors have taken up most of the available trailer home sites and rooms in town that were formerly filled by ecotourists who spend far more money per day in locally-owned businesses that the mine workers do. The increase in heavy truck traffic is disruptive of Arizona Trail hikers and the influx of mountain bikers flocking to Patagonia thanks to the Patagonia Lumberyard fleet of tourist-focused businesses. Long-time residents are considering leaving Patagonia due to loss of tranquility and prospective property owners that fear more negative impacts are coming so are ambivalent about settling here. As someone involved in the USDOI designation of the Santa Cruz Vally Heritage National Heritage Area, it is obvious that South32’s goals and practices have largely ignored the reasons that Sonoita Creek and Santa watersheds are now nationally recognized for exemplifying natural and historic cultural amenities that South32’s presence visibly disrupts. An assessment of South3q2’s impact on ecotorism income and wildlife is urgently needed to detect and prevent even more significant impacts.