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*Sent via electronically to:*

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65668>

3<sup>rd</sup> June 2024

Mr. Kerwin S. Newberry  
Forest Supervisor  
Coronado National Forest  
ATTN: Hermosa Critical Minerals Project  
300 West Congress Street  
Tucson AZ 85701

**RE: Scoping Comments on the Forest Service's Notice of Intent to Prepare an Environmental Impact Statement for the Hermosa Critical Minerals Project**

Dear Forest Supervisor Newberry:

Revival Gold (Idaho) Inc. (Revival Gold) is submitting these comments in response to the Notice of Intent (NOI) that the Sierra Vista Ranger District; Coronado National Forest, Arizona (USFS) published on May 10, 2024 in the Federal Register Vol. 89, No. 92 for the Hermosa Critical Minerals Project. In the NOI, USFS is seeking public comments on the issues to be evaluated in the Environmental Impact Statement (EIS) that the USFS is preparing for the Hermosa Critical Minerals Project. The comments below are based on Revival Gold's review of the information in the NOI, and the materials that USFS has made available on its Hermosa Critical Minerals Project website: <https://www.fs.usda.gov/project/coronado/?project=65668>.

The Nation will benefit greatly from the production of two critical minerals, manganese and zinc, from the Hermosa Critical Minerals Project. Both minerals are needed to help the U.S. achieve its energy transition goals. These minerals also have national defense applications. Because the Hermosa Project is the country's only advanced-stage manganese and zinc mining project, it is imperative that the USFS complete the EIS process for this project as efficiently as possible and adhere to the projected schedule to issue a Record of Decision in July 2026.

The underground mine currently under development on adjacent private land needs to expand on to National Forest System lands in the Coronado National Forest so that the U.S. can fully benefit from this manganese and zinc ore deposit. The proposed expansion on National Forest System lands to build a second dry-stack tailings storage area, to conduct ongoing mineral exploration, and to construct ancillary facilities like fencing are necessary for the logical and full development of the Hermosa manganese and zinc mineral deposit. The small footprint of the proposed facilities on National Forest System lands (roughly 500 acres) will be a minor impact to the Coronado National Forest – especially when measured in the context of the benefits of having a secure domestic source of manganese and zinc, as well as the socioeconomic benefits this project



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will create. Additionally, these facilities will be reclaimed when mining and mineral processing activities are completed.

Revival Gold recommends that the Hermosa Critical Minerals Project EIS evaluate the following issues:

- The advanced technology and state-of-the-art environmental safeguards that the project proponent, South32, will employ to set a new standard for sustainable mining;
- South 32's proposed water conservation measures that will consume approximately 75 percent less water than other mines in the region;
- The proponent's proposed goal to achieve no-net loss for biodiversity;
- The significant long-term socioeconomic benefits to the local and state economies stemming from this investment, which is the largest private investment in Southern Arizona's history;
- The substantial employment opportunities associated with this project;
- A detailed analysis of the adverse consequences that selection of the No Action Alternative would produce including maintaining the Nation's dangerous reliance and supply chain vulnerabilities associated with importing 100 percent of the manganese and 77 percent of the zinc we use from foreign countries;<sup>1</sup> and
- The project proponent's rights pursuant to the U.S. Mining Law to locate, occupy, and use mining claims and mill sites on National Forest System lands for ancillary facilities reasonably incident to mining and for ongoing mineral exploration.

Revival Gold very much appreciates the opportunity to submit these scoping comments to BLM for the Hermosa Critical Minerals Project and requests that Revival Gold be added to USFS' mailing list for this project.

Yours truly,

Hugh Agro, President and CEO

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<sup>1</sup> According to the USGS Minerals Commodity Summaries 2024, the US is 100 percent reliant on manganese imported from Gabon, South Africa, Australia, and Georgia, and 77 percent reliant on zinc imported from Canada, Mexico, Peru, and Republic of Korea. <https://pubs.usgs.gov/publication/mcs2024> page 11.