Comments for Consideration for the **Hermosa Critical Minerals Project #65668**

Roads and Transportation

1. The figures A2 through A9 in Appendix A, Roads, South 32 Hermosa Plan of Operations, do not include grade and slope of proposed haul road. The mapping of topography is of poor resolution and does not give a true representation of primary access road. Can these figures be represented in a manner that is more reviewable?
2. The proposed primary access road between Forest Road 812 Flux Canyon Road and Forest Road 4653 Barriles Tank Road traverses’ steep SW facing slopes the resulting scars will be visible from a considerable distances. Will slope and grade be reviewed and is this road proposal within the guidelines of Scenery Management Plan 2013?
3. Erosion and runoff on the primary access road may be difficult to manage, impacting water quality. The shape of the land will be considerably altered. Can this be mitigated and managed without furthering the damage?
4. Table 2A, Page A-5 is vague and contradicted in the following note. It could be assumed that the greater the construction corridor slope the greater the disturbance. The Access Road traverses a considerable elevation changes and difficult topography to intersect with Hwy. 82. Large and loaded trucks may have a challenging time negotiating this road during adverse weather conditions creating environmental impacts. Will the Coronado National Forest consider these transportation related impacts during their assessment?
5. There is little mention of the topography where the primary access road intersects with State Hwy 82. The grade may require an extensive system of turn and runout lanes to accommodate large trucks entering and exiting the access road. Is the Arizona DOT part of the analysis process and what are the design features needed to accommodate this type of traffic? Will there be detailed drawings of this intersection? Although it is not part of this process, the Cross Creek Connector will also have a large footprint on Hwy, 82 and the adjoining lands. How will that affect the scenic designation and overall impact to a secondary highway?
6. Hwy 82, at the point of primary access, is elevated above the existing topography and will require a large amount of fill to widen the highway for access. Where will this fill be obtained and how will it impact the vegetation and topography of the area? This is USFS land and will require major alterations to the highway and USFS adjoining lands.
7. Arizona Highway 82 is designated a Scenic Highway, (one of the first in Arizona). Considering the major construction and alterations to Hwy. 82 for both Access Road and the Cross Creek Connector, will this negate the scenic designation and have impacts on the access to Patagonia State Park and Circle Z guest ranch and their recreational value?
8. Hwy 82 has a considerable amount of truck traffic, both north and south generated by cross border truck traffic through the Nogales, AZ port of entry. What will the impacts be of the additional traffic generated by the Hermosa Mine considering that truck traffic is at 22% of total traffic, (referenced Operating plan)?
9. The intersection of Hwy. 82 and Grand Ave. in Nogales, AZ is a busy intersection. The addition of the Hermosa Mine traffic will add to the traffic and congestion of Grand Ave. How will this additional traffic on Grand Ave. through to I-19 affect the businesses, schools and truck congested areas of Nogales?
10. Will the local first responder communities be prepared for the additional traffic associated with the Hermosa Mine and their response to medical, fire and HazMat. Included are Patagonia, Sonoita, Nogales, Rio Rico, Santa Cruz and Cochise Counties.

Wildlife

1. What will the cumulative effects of the Hermosa Mine and the Border Wall have on endangered species and other wildlife in the Patagonia Mountains?
2. Will wildlife movements to water be affected by the heavy day and night traffic use on the road system for the Hermosa Mine and added traffic on Hwy 82?
3. Will the de-watering of Springs in the Patagonia Mts. affect distribution of wildlife in southwest Arizona?
4. Will nighttime lighting of the mine and nighttime road travel by lighted vehicles affect bird migration?

Powerline and Scenery

1. The proposed power line by Unisource is considering the use of dark colored towers for the transmission line. Will this conform to the scenic view of the sky, grassland and scattered deciduous and conifers through which it is purposed to be routed? Will a scenic quality evaluation be completed along the proposed route, and will other types of transmission line options be evaluated?
2. A more robust KOP siting should be considered for both the proposed power line and proposed primary and secondary road system for Hermosa Mine. In consideration of the scenic qualities associated with Hwy. 82 and the private, state lands between Patagonia and Nogales this scenic evaluation should be considered a priority for USFS and Santa Cruz Co.

Socioeconomics

1. Northeast Santa Cruz Co. is a destination for eco-tourism and agrarian based tourism. Hermosa Mine is heavy industry. How do the differing industries not affect each other’s economies?

Air Quality

1. Considering the already impaired air quality of Santa Cruz Co., due to its proximity to Nogales, Sonora MX, and a general southwest airflow; will the added impairment generated by Hermosa Mine be considered cumulatively?

Range

1. How will the primary access road affect the current range allotments on the west side of the Patagonia Mts.?
2. Will the Patagonia Mts. area ranches and allotments on USFS and Arizona State lands be affected by mining activity and its possible effects on water wells used by area ranches?
3. Will de-watering of the mine affect the ranches located in the San Rafael Valley?

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