My name is Tracy Vivanco. I hold a BS in Environmental Policy and Natural Resource Management from the University of Michigan. I also have advanced studies in Restoration Ecology from the University of Wisconsin. I am a former employee of the US Fish and Wildlife Service, the US Forest Service, the Wisconsin Department of Natural Resources, The Nature Conservancy, the US Department of Agriculture’s Animal and Plant Health Inspection Service, and I am a current employee of US Customs and Border Protection. I have been a resident of Santa Cruz County, Arizona since July of 1999, nearly 25 years and nearly half of my life.

“The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations.” The proposed “Hermosa Critical Minerals Project” is in the middle of the Madrean Sky Islands which has some of the highest biodiversity in the world. This proposed project is within the Coronado National Forest, the most ecologically diverse national forest in the country. The Coronado National Forest hosts more threatened and endangered species than any other National Forest in the US. As a former USFS employee who surveyed sites for biological diversity prior to evaluation of such projects on another national forest, I hold that mission close to my heart. I hope that this mission will not be lost when evaluating the potential impact of this project going forward. I hope that those who are tasked with considering this project under the NEPA and EIS system will take into consideration the alternatives and full cost/benefit analysis.

A private, foreign-owned company intends to mine out their privately owned land within this ecosystem of the available manganese and zinc resources. It has also asked the federal government caretakers of adjacent land of equal or larger size to do the same on that property. While the company and others mention that the proposed area in question has a history of mining, it looked nothing like, and had nowhere near the impact on the landscape and the community that this proposal would have if implemented as requested by South 32. I hope that those who are evaluating this project under the NEPA and EIS system will take into consideration that this highly valued and rare ecosystem will be forever altered and access to and use of this land and its many other resources by wildlife and humans will be forever changed and extremely limited. All of this to produce EV batteries, and the money that can be made from that production. It hardly seems like a fair trade/net gain on so many levels.

Much of South 32’s proposal lacks specifics and much of it mentions monitoring without any plan to correct issues other than to state that they will be held to state and federal regulations and standards. There seems to be very little detail about mitigation of negative effects, or prevention. One thing that is very clear is the historical record this company has around the world and that of its parent company BHP: Tailings dam failings, fatalities of its workers in safety incidents, dust related health issues in the communities around their mines. Rather than the proposal that South 32 monitor these potential issues, health and safety monitoring should be under independent review as well. Independent monitoring should not be influenced by company employees and company dollars. South 32 stands to profit billions of dollars from this mine and the paltry amount they have “donated” and “invested” thus far in the community in the form of grants and cheeseboards and other giveaways will never come close to the true value of the health of the ecosystem and the community, and the resources lost over the life of this mine and long after they walk away. Even their promise of jobs to the local community is miniscule in the grand scheme of the value that could potentially be lost by allowing all that they propose to do on these federal national forest lands. The “land of many uses” could become the “land of full destruction for foreign corporate gain”. Critical wildlife habitat, watershed and water aquifer resources, outdoor recreation, ecotourism and the livelihood and health of our community will be the cost.

Specific points of concern:

No clear picture of how the dewatering will affect the aquifer levels, how fast the aquifer might recharge, and even where that water will be depleted from and returned to (seems to be some talk about fault lines and where the current aquifers are). And what are the specific plans to account for water quality and contamination? Other than the tailings pond/dam/dry stack containment areas there is no real mention of the numerous hazardous materials that will be most assured be brought to the site and utilized to mine the minerals. What is their hazardous materials plan both moving materials into and out of the site?

Very little discussion about the dust, dust abatement beyond the roads and road maintenance. What about all the health effects such as magnesium that have been reported at other manganese mine locations due to poor containment of hazardous materials associated with the mining activity. What will be the impact to the integrity of the ecosystem and geologic systems using this cement and mine waste to fill in the void by the materials they are extracting?

The South 32 recognition of this area as a critical ecosystem was minimal at best. They barely scratched the surface as to the significance of the Sky Islands and how their activities will alter the essential nature of this area. The loss of interconnectedness right in the middle of critical habitat cannot be made up for. And in turn, how that will impact the current ecotourism and recreational usage of the area and in turn the regional usage for those purposes. Does the Forest Service have a thorough accounting of those resources (animals, plants, watershed management, seeps and springs, other geological considerations) on which to make a thoughtful and considered decision on this? Certainly

How can 24/7 operations possibly be in the interest of the Dark Sky Initiative, not to mention wildlife and plant life and human life?

No recognition of the seismic history of the area and how this might be of concern to their operation of a working mine in this location.

No mention of how their impact on the landscape would increase the fire and flood danger of the area and impact the public service sector responses to increased fire and flooding. And how and if they would contribute to fire and flood suppression efforts. This puts a huge burden on the public service sector to address.

One use to the exclusion of all others is the outcome of South 32’s proposal. During testing, construction and operation, all USFS lands involved in the proposal will be off limits for other uses. This means that beyond the destruction of the current fragile and unique ecosystem, traditional recreation, grazing, hunting, and transportation routes through the area will no longer be available to all other current and potential land users for the duration of the mine (70+) years and likely not after due to the hazards of containment and stabilization left in the wake of a mine closing after it’s lifetime. There will be little to no scenic, ecological or practical value left in this land at the conclusion of this use. This is something that the USFS is charged with considering and protecting. The US Forest Service is to “care for the land and service the people”. This proposal does neither.