

March 25, 2026

From:

Fritz P Sawyer



To:

Reviewing Officer

Southwestern Region Forester

ATTN: Hermosa Critical Minerals Project- Final EIS

333 Broadway Blvd SE

Albuquerque, NM 87102

Re: Objection to Final Hermosa EIS (Project #65668)- Trackout

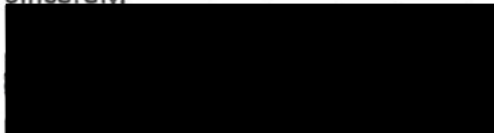
Sir,

I am objecting to the proposed to "PREVENTION OF SEDIMENT TRACKOUT SOUTH32 HERMOSA CRITICAL MINERALS PROJECT" memorandum dated November 12, 2025 (see attachment). This action plans lacks trackout protections for businesses (e.g.: repair shops, car washes, laundromats, service companies, etc.) who work directly or indirectly with the Hermosa Mine off of the mine site. Additionally, this document and/or the EIS does not protect the Harshaw Creek with road crossings to prevent vehicle undercarriage washing with bridging or culverts. The car wash or the wheel washing will prove inadequate (see photo).

I have "standing" as I have commented on the draft EIS on this trackout issue.

The Hermosa EIS needs to address these issues as they are connective actions.

Sincerely,



Fritz P Sawyer

nds can come at
have just seen in

Patagonia it's almost useless. To
be truly effective, Firewise needs
to be a community-wide program.

program for Patagonia? Contact
me at 520-604-0200.

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Hermosa Water Discharge Impacting Crossings

Increased flow concerns some residents



Photo by Marion Vendituoli

Harshaw Creek crossings have been getting deeper due to the discharge of millions of gallons of water from South32's Hermosa Project.

By Marion Vendituoli

Flowing water is a rare and beautiful sight in Southern Arizona. People are drawn to it. So are wildlife, birds

and on bicycles—are the primary users of the roads the creek crosses. Acting Patagonia Volunteer Fire and Rescue (PVFR) Chief Zay Hartigan said that so



PREVENTION OF SEDIMENT TRACKOUT

SOUTH32 HERMOSA CRITICAL MINERALS PROJECT

November 12, 2025

PURPOSE OF MEMORANDUM

Public comments received on the Draft Environmental Impact Statement (Draft EIS) for the South32 Hermosa Critical Minerals Project (Project) raised concerns about the potential trackout of sediment, soil, tailings, or ore by vehicles leaving the Project site. The purpose of this memorandum is to identify control and prevention practices that will minimize trackout from the Project site to public roads, including Harshaw Road and the Primary Access Road, and prevent exposure of the public to soil, sediment, or dust related to the Project.

The following control and prevention practices will be implemented and are discussed below:

- Vehicle washes
- Wheel washes
- Use of sealed containers and minimization of aboveground vehicle exposure to ore
- Implementation of Stormwater Pollution Prevention Plan (SWPPP), including good housekeeping and best management practices
- Fugitive dust management

VEHICLE WASHES

Vehicle and equipment wash facilities were identified as part of the Project operations in the South32 Hermosa Critical Minerals Exploration and Mine Plan of Operations (MPO) (see "truck wash" on Figure 2-1 in South32 Hermosa 2025). This facility will be used periodically to clean heavily soiled vehicles within the boundaries of the mine site. This will reduce the movement and loss of soil and sediment on roads internal to the facility.

WHEEL WASHES

Wheel washes are anticipated to be installed within the private land portion of the facility in order to directly control trackout to public roads. All vehicles that exit the Project area onto Harshaw Road or Primary Access Road, will first pass through a wheel wash station. Installation of the wheel wash is anticipated to take place by the end of 2026, prior to full-scale production.

As discussed in the MPO, any collected sediments from the vehicle and equipment wash areas are anticipated to be disposed in the lined Tailings Storage Facility (TSF).

SEALED CONTAINERS/EXPOSURE MINIMIZATION

The use of sealed containers to transport both sulfide concentrate (from Taylor) and oxide ore (from Clark) was specified in the MPO. This technology is intended to eliminate spillage, dust, and reduces the potential release of material during an unexpected event or accident during transportation from the Project.

All packaging of concentrate and ore into the sealed containers occurs at the processing facilities, eliminating the need to move material substantial distances within the site prior to packaging. Sulfide concentrates drop from the filter onto a conveyor that places concentrate directly into the concentrate containers that will be sealed and used for shipping. Oxide ore is loaded into the sealed containers from the discharge gate of the crushed ore silo.

STORMWATER PRACTICES

Appendix B of the MPO provides details regarding the preliminary design, layout and strategies for stormwater management associated with the activities proposed on NFS lands. Stormwater management is pursuant to the SWPPP to protect receiving waters from stormwater runoff. Other good-housekeeping or best management practices would also be implemented, including using water trucks for dust suppression during soil-disturbing activities, compacting soils on roadways and on graded surfaces, and using gravel surfaces when practicable. Appendix A (Section A.2) of the Draft EIS contains an additional list of predictable standard best management practices, regulatory requirements, and/or industry standards that would likely be required for the Project, including measures specific to soil and air quality.

The above practices will reduce the potential for public exposure to sediment and soil from the Project via water and air.

FUGITIVE DUST MANAGEMENT

A Dust Control Plan was developed in accordance with air permitting regulations administered by the Arizona Department of Environmental Quality (Trinity 2024). The Dust Control Plan as well as the Tailings Storage Facility Operations, Maintenance and Surveillance Plan identifies the control measures and operational practices employed by South32 Hermosa to minimize and control fugitive dust emissions created by haul road travel and mining operations consistent with the Project's air permit. The Dust Control Plan identifies the dust control procedures for haul roads, open areas, stockpiles, and material handling.

Analysis was submitted to the Forest Service assessing the potential for dust deposition from the Project, specific to effects on sensitive plant species (Gradient 2025). The analysis concluded that with a moderate to high level of certainty, Project-generated dust is not expected to adversely impact sensitive plant species. As part of this analysis, it was determined that dust deposition associated with the proposed Project is expected to be concentrated adjacent to dust sources, primarily downwind and within 100 feet. Widespread dust deposition that could result in movement of soil out of the Project boundaries is not anticipated.

CONCLUSIONS

Multiple levels of control and prevention practices are being and will continue to be implemented that will minimize the risk of trackout from the Project site to public roads, including Harshaw Road and the Primary Access Road, or exposure of the public to soil, sediment, or dust related to the Project. Exposure will be minimized through prevention practices that include:

- Use of sealed containers to transport both concentrate and ore outside of the Project area on public roads,
- Implementation of stormwater management controls and procedures, as required by permit, and
- Implementation of dust control controls and procedures, as required by permit.

In addition to prevention practices, trackout will be directly controlled using wheel washes for all vehicles exiting the Project as well as periodic vehicle washing.

REFERENCES

Gradient. 2025. Assessment of Dust Deposition-Related Vegetation Effects for the South32 Hermosa Critical Minerals Exploration and Mine Plan of Operations. January 29.

South32 Hermosa. 2025. South32 Hermosa Critical Minerals Exploration and Mine Plan of Operations. Updated April 8, 2025

Trinity Consultants. 2024. Dust Control Plan, Hermosa Project. Originally submitted in December 2023, amended in June 2024. Available at:
https://static.azdeq.gov/permits/south32/aq_final_permit.pdf