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Organization:

Title:

Comments: My name is Robin Solari, I am writing to you regarding the Hermosa Critical Minerals Project #65668. I am a local resident in Santa Cruz County, AZ and I have deep concern for the many potential impacts this project is likely to incur.

I am a retired Landscape Architect, with over 15 years of experience working for the California Department of Transportation which included working with biologists, geologists, USFS and Caltrans mitigation specialists, and others preparing EIS/EIR's for project compliance with NEPA and CEQA. Additionally, I prepared and designed mitigation plans and strategies related to projects where direct and indirect environmental impacts were anticipated.

Please study the following topics of concern for direct, indirect, and cumulative impacts. Please consider "No Action-Project not Permitted" due to the numerous significant impacts and lack of independent oversight this project is more than likely to incur.

I have added a few internet links at the end and a publications with respect to South 32 and its track record in regard to environmental stewardship.

Geology and Minerals

Issue - Ground Disturbance/ Subsidence from Dewatering

Issues- Public Safety/Toxic Mineral Exposure (Manganese and Lead)

Issue: Tailings Runoff

Water Quality and Quantity

Issue -Dewatering/Subsidence/ Groundwater

Issue - Discharge into Harshaw Creek-

Issue- Local wells

Vegetation and Wetlands

Issue - Ground Disturbance

Issue -Water Quality and Quantity

Wildlife and Special Status Species, including Migratory Birds

Issues- Ground Disturbance and Project Infrastructure

Issue - Noise and Duration

Issues -Water Quality and Quantity

Issue- Lighting and Duration

Soils

Issues - Ground Disturbance and Project Infrastructure

Issues - Erosion and natural water body contamination

Non-native and Invasive Plants

Issue - Ground Disturbance

Air Quality and Greenhouse Gas Emissions

Issue - Air Emissions from trucks and machinery

Issue- Toxic effects of airborne magnesium and lead particulates (Foreseeable concern based on any number of opportunities for material to become airborne during extraction, processing, handling, transport, and residual material in tailings.

Transmission Lines

Issue- Fire Hazard

Issue- Effect on Property Values (Foreseeable issue due to health and safety concerns as well as visual impacts)

Cultural Resources

Issue- Ground Disturbance and Project Infrastructure/ Archeological Artifacts

Social and Economic Conditions

Issues - Project Infrastructure, Public Safety, Access, and Transportation

Issues - Quality of Life and Non-Market Values (Foreseeable adverse impacts due to the community's identity as an eco-tourism outpost.)

Issue- Effects on local tourism and recreation-based business

Issue: Long term Property Value Degradation

Environmental Justice

Issues - Air Emissions, Project Infrastructure, Noise, Public Access, Public Safety, Transportation, Wastes (Hazardous and Solid), Water Quality and Quantity

Lands and Realty

Issue - Property values (foreseeable decline based on historical data from former mining communities)

Noise

Issue - Increased Noise Levels from Project Activity

Visual Resources

Issues - Project Infrastructure, Transmission lines, Extensive Unnatural Grading, Lighting,

Issues- Visual Unity, Intactness, Character- all significantly compromised

Wastes, Hazardous or Solid

Issues - Lack of Legally Binding Comprehensive Plan to Prevent, Dispose, and Mitigate the Hazards of Toxic Mineral Extraction

Recreation

Issues - Project Infrastructure and Noise

Issue - Lack of accessibility

Issue -Water Quality and Quantity

Native American Religious Concerns

Issue-Ground Disturbance and Project Infrastructure

Traffic Impacts

Issue- increased volume of semi-trucks

Public Health and Safety

Issues- Lack of local infrastructure to support the health and safety of workers and residents in region for both routine and emergency healthcare.

Issues- Toxic Mineral Extraction, Processing, and Transport (No proven and legally binding plan to address the many environmental /health concerns)

Self-Monitoring and Mitigation

Issue- Company (South32) has a Historic Global track record of poor environmental compliance

Issue- Scope and the High Risk for Significant Impacts dictate higher standards for accountability be implemented

Issue- Lack of independent oversight and monitoring

Links:

Manganese

<https://www.washingtonpost.com/world/interactive/2023/ev-mineral-manganese-south-africa/>

<https://www.youtube.com/watch?v=OVQEUSF-Nu8>

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8382573/>

South32

<https://www.mining-technology.com/news/south32-to-pay-fine-for-diverting-water-to-coal-mine/>

<https://www.abc.net.au/news/2021-04-01/mine-fined-for-dumping-coal-sludge-into-mount-kembla-creek/100045216>

<https://actionaid.org.au/resources/south-african-women-arrive-in-australia/>