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Organization: Calabasas Alliance/La Alianza Calabasas

Title: Chairman of the Board

Comments: Thank you for the opportunity to submit my comments to the NFS during the EIS Scoping Period for the Hermosa Critical Minerals Project #65668.

My submission represents myself as a concerned citizen of Santa Cruz County, AZ. I also am submitting these comments formally as the Calabasas Alliance Chairman of the Board, and as a Board Member of the Friends of the Santa Cruz River. Both organizations are registered Nonprofit 501[c](3) organizations with the State of Arizona and the IRS.

My background is in Environmental Planning, Natural Science, and Public and Higher Education.

I am concerned about the potential negative impacts to the ecosystem the Hermosa Project is situated in. This ecosystem includes the geographic areas any activities of the Hermosa Project are conducted in.

I have specific concerns about the potential impacts the Hermosa Project will have on Wildlife including, but are not limited to, impacts created by the dewatering process; impacts created by the air pollution including dust and odors; impacts created by habitat destruction on site and along roads used for the Hermosa Project; impacts created by artificial light; impacts created by noise; impacts created by vibrations; impacts created by power transmission lines; impacts created by damage to the Hermosa Projects toxic materials infrastructure due to a major earthquake.

In light of these potential impacts, I request there be independent, multi-year surveys to be conducted to determine species diversity for birds, mammals, reptiles and amphibians, fish, invertebrate populations with special attention given to the US Fish and Wildlife listed threatened and endangered species and with special attention to springs and riparian zones.

Roadkill Impacts

Please study the potential impacts of increased wildlife roadkill from this Project, especially impacts on threatened and endangered species. I request this study include not just Forest Service roads but all roads in Santa Cruz County vehicles associated with this Project will be using. Due to increased in heavy vehicle traffic on St. Rt. 82 and Harshaw Creek Road (FS Road 49) we already are seeing an increase in roadkill of birds and mammals. Based on this increase we can tentatively conclude there also is an increase in roadkill of smaller animals including endangered invertebrates.

Power Transmission Line Impacts

Please study the potential impacts on wildlife by any power transmission lines associated with this Project. The study should include, but not be limited to, construction impacts to habitat, impacts created by transmission line maintenance, impacts from direct contact with powerlines and utility poles, and potential wildfires impacts created by the construction and operation of transmission lines.

Damaged Toxic Materials Infrastructure Impacts Created by Major Earthquake

The USGS has listed the Patagonia region as a Number 3 Earthquake Hazard Zone (on a scale of 1-5).

In 1877 a 7.8 magnitude earthquake occurred in the region causing boulders "the size of houses" to roll downhill in the Tucson Basin. Church bells in Santa Fe, NM rang. To put this into perspective the 1989 Loma Prieta 6.9 magnitude earthquake in Santa Cruz County, CA. released approximately 10 ten times less energy than the 1877 earthquake yet was powerful enough to do significant damage in the San Francisco Bay region including

severely damaging a portion of the San Francisco Bay Bridge ~70 miles from the epicenter and significantly damage numerous structures in the City of San Francisco ~80 miles from the epicenter.

Damage assessment, clean up, and repair measures post 1989 Loma Prieta earthquake was significant and protracted. For example, in Santa Cruz County, CA there was only one road opened on a regular basis to get in and out of the entire County for five weeks making it difficult or impossible to obtain goods and services and adding many hours to the daily commute of approximately 19,000 vehicles during this time.

Please study the potential impacts on wildlife from the Hermosa Project in the event of a major earthquake including the potential release of specific toxic materials into the environment, the potential magnitude of that release, the magnitude of potential mitigation efforts, and the length of time expected for mitigation to be completed.

The MPO must include a detailed earthquake response plan including minimizing harm to wildlife due to the unintended earthquake caused release into the environment of toxic materials such as diesel fuel, cyanide compounds, sulfuric acid, ammonium nitrate, cement powder, etc.

Impacts created by the "Dewatering" Process

Please study the potential impacts on wildlife the zone of depression created by the dewatering process of this Project. This should include, but not be limited to, estimated area of impact, impacts to springs and surface water, impacts to vegetation wildlife depend on for food, shelter, and other survival purposes, impacts of increased risk of wildfire created by desiccation of vegetation within the zone of depression.

Water Assessment

Please study broadly and in detail the impacts the Hermosa Project will have on our areas water quality, quantity, and water availability for humans and wildlife.

A Harshaw Creek/Alum/Flux Total Maximum Daily Load (TMDL) study and a Comprehensive Water Study (CWS) on Harshaw Creek must be considered.

Fire Risk and Management

Please conduct a comprehensive fire risk study based on all aspects of the Hermosa Project including the effects of the "dewatering" process and climate change on vegetation. Will these create greater fuel loads? If so, how much? How will mitigation measures be implemented?

Fire and Flood Emergencies

Please study the regions fire and flood related emergency response capacity of the NFS and all participating entities including FEMA and Homelands Security.

Recreation

Please study in detail current recreation patterns, associated economic activities, and how they may be affected by the Hermosa Project. Will people be able to safely hike, gravel bike, hunt, fish, etc. in the area? Will people choose to recreate elsewhere given the texture of their experience will be changed by the 24/7 activities of the Hermosa Project? A quantifiable answer to these questions is requested to be addressed in the DEIS.

Nature-Based Restorative Economy

A robust nature-based economy currently exists in the region roughly triangulated between Madera Canyon in Pima County, thru the I-19 corridor in Santa Cruz County, up to Patagonia Lake and the Patagonia mountains.

My concern is this project will significantly impact businesses in this economic sector and will limit opportunities for those seeking nature-based restorative activities such as birding, hiking, backpacking, gravel biking, astrotourism, fishing, and hunting, etc. For example, Airbnb type housing once available to the ecotourist wishing

to stay overnight in Patagonia is no longer available due to Hermosa Project employees monopolizing these facilities.

Please study in detail the likely cumulative impacts the Hermosa Project will have on the current nature-based restorative economy of this region.

Housing

Please do a detailed regional housing study that includes analyzing the current housing inventory of Santa Cruz County, predicting future housing demand, and how this demand might be met. How will the Hermosa Project affect low income housing individuals and families? How will these effects be mitigated?

Environmental Justice

Spanish is the native language for approximately 75% of Santa Cruz County residence. The inability of the NFS to produce the Mine Plan of Operation in Spanish for review during the scoping period effectively discriminated against a large percentage of the Hispanic population of Santa Cruz County ability to comment during the scoping period.

We understand the MPO is a South32 Hermosa document. However, the NFS is mandated to supply the public with pertinent, accessible documents regarding the Hermosa Project of which the MPO is central. This blatant disregard to provide appropriate materials to our Hispanic population can readily be construed as Environmental Racist act by the USFS and South32 highlighting the need to ensure Environmental Justice issues created by the Hermosa Project are served.

The DEIS must be in Spanish as well as in English. Failure to do so will be grounds for suit against the USFS.

Please study the economic and health effects of the Hermosa Project on environmental justice communities in Santa Cruz County and evaluate whether these effects are disproportionate and how. Explain how they will be addressed if they are found to be so.

Please review the attached worldwide public literature review of South32 prepared by Western Environmental Science Technical Assistance Center for Environmental Justice for the Calabasas Alliance/La Alianza Calabasas to better understand how to prevent documented past Environmental Racist actions by South32 with regard to the Hermosa Project.

Mining towns, with few exceptions, are notorious for their increase in crime and violent behavior, disturbing the social fabric and requiring greater law enforcement activity and EMS response than most other communities with a similar size population. Please explain how South32 plans on mitigating these negative social behaviors and cover for increased costs of law enforcement and EMS services created by employees for the Hermosa Project.

Please study in detail the economic impact of the Hermosa Project on rural community character in the Patagonia and Sonita/Elgin areas and consider both the tangible and intangible elements including potential social unrest created by the workers associated with the Hermosa Project and citizens unhappy with the negative impacts created by the Hermosa Project.

I hereby incorporate the comments submitted by Sky Island Alliance, the Center for Biological Diversity, Patagonia Area Resource Alliance, the Calabasas Alliance, all other conservation organizations and all government agencies commenting during this DEIS scoping period.

Skye Leone

Chairman of the Board

Calabasas Alliance/La Alianza Calabasas

Board Member
Friends of the Santa Cruz River

Founding Board Member
Friends Foundation International