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Comments: The Hermosa project, situated within the Madrean Pine-Oak Woodland, is at the heart of a crucial biodiversity hotspot known as the Sky Islands. It hosts an array of species, including fifteen threatened, endangered, and candidate species, alongside 129 sensitive species, all reliant on the habitat surrounding the project. The proposed mining activities raise concerns about the USFS's ability to effectively manage such ecologically sensitive areas. The preliminary documents from South32 and the USFS show that they are overlooking numerous issues, emphasizing the necessity for a detailed examination in the DEIS.

Of particular concern are the impacts on threatened and endangered species like the jaguar, Mexican spotted owl, yellow-billed cuckoo, ocelot and several plant species. Despite the presence of critical habitat for these species, no comprehensive studies have been conducted to assess the potential impacts of mining activities. The lack of Section 7 consultation with the USFWS raises questions about the thoroughness of the assessment. Furthermore, the potential disruption of wildlife corridors, underscores the need for rigorous evaluation before proceeding with the project.

In addition to the direct impacts on wildlife, the project's potential to introduce invasive species and alter hydrology raises further ecological concerns. Soil compaction, water contamination, and the disruption of natural vegetation communities are among the potential consequences that must be carefully evaluated before the project moves forward. Hermosa must also prove that they will devote the funds, resources, and staff time to mitigate all of the effects the project has the surrounding ecological and human communities. The DEIS must also consider the broader context of climate change, recognizing its compounding effects on biodiversity and the necessity of maintaining landscape connectivity. The legal action against the ADEQ regarding water quality underscores the complex challenges and risks associated with the project's water management practices, which demand thorough scrutiny in the environmental assessment process.