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Title:

Comments: After having read the South 32 Hermosa Critical Minerals Plan of Operations, I must comment on the long -term ability to monitor discharges to Harshaw Creek and surrounding above-ground and underground water sources. Who is responsible for water quality monitoring? Is this critical responsibility left to South 32 or will this responsibility fall to a State or Federal agency? I am dismayed that millions of gallons of water will be "allegedly" treated and returned to various water sources. If contamination occurs, will mining operations cease or just simply remediated in some fashion? The historic, damaging effects of mining operations on waterways throughout the Western United States is well documented with millions having been spent on remediation efforts. Damage to underground water resources and above ground streams takes generations to restore. In the meantime, communities suffer, wildlife is impacted, and the economic health of communities is damaged.

The 2nd point of concern that was noted in the Plan was the construction of a proposed 138-kV overhead transmission line, in part across NFS land, to serve the Project and support service reliability of all of UniSource customers. Why an overhead line? Because it's easiest and cheaper? My concern is based on the potential for wildfire caused by overhead powerlines as was the case in the deadly Camp Fire that destroyed the town of Paradise, California. South 32 notes in their plan of operations that wildfire concerns are planned for but the description of their immediate resources is vague. In fact, the US Forest and other Wildland fire fighting resources will be the main source for suppression activities. In light of current climate changes issues with intensifying size and severity of large-scale fires, I know that the USFS and local firefighting resources may prove to be inadequate. In fact, I am aware that currently the Forest Service is failing in its ability to hire wildland firefighters for the upcoming Fire season. I am a retiree of the US Forest Service and hear from former coworkers, who are still active in the USFS Fire organization, that potential for loss of life, structures and damage to communities is at a critical point. The federal agencies tasked with fighting these bigger and more dangerous fires are being overwhelmed. I would ask the Forest Service during their analysis take seriously the potential risks of a proposed overhead powerline. The surrounding forest lands and community of Patagonia would be better served by requiring underground installation of power to South 32 facilities.