

Data Submitted (UTC 11): 6/9/2024 6:06:50 PM

First name: Robin

Last name: Lucky

Organization:

Title:

Comments: Robin Lucky - President Calabasas Alliance - Rio Rico, AZ

"The USDA Forest Service (FS) is responsible for sustaining the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations. Their mission is achieved through quality land management under the sustainable multiple-use management concept. Here are some key aspects of their mission:

- 1.Conservation Ethic: They advocate for promoting the health, productivity, diversity, and beauty of forests and associated lands.
- 2.Listening to People: The Forest Service responds to diverse needs by engaging with people in decision-making processes.
- 3.National Forests and Grasslands: They protect and manage these areas to demonstrate sustainable multiple-use management.
- 4.Assistance to Landowners: Providing technical and financial assistance to state and private forest landowners for good stewardship and quality land management.
- 5.Community Support: Assisting cities and communities in improving their natural environment through tree planting and forest care.
- 6.International Assistance: Offering technical support and scientific exchanges to sustain global resources and encourage quality land management.
- 7.Rural Economic Development: Helping states and communities use forests wisely for economic development.
- 8.Scientific Knowledge: Developing and providing knowledge to protect, manage, and use forests and rangelands.
- 9.Work, Training, and Education: Providing opportunities for employment, training, and education aligned with their mission

In summary, the Forest Service plays a crucial role in maintaining the ecological balance, supporting communities, and ensuring sustainable resource use across the United States."

A.Also from the Forest Service: National forests across the United States were established to provide natural resource-based goods and services to American citizens, and to protect timber and watershed resources. Management of national forests is jointly based on the principles of conservation and multiple use. Please study the tradeoff of mining critical minerals that will make a negligible impact on global mineral supplies versus conservation of lands and water.

B.Also noted by FS, many areas of the Coronado are highly mineralized, and the Forest Service has an important role in administering mineral exploration and extraction while minimizing surface resource impacts, consistent with mining regulations and policy. Of primary and increasing importance are the watersheds and the ability to capture the precipitation that recharges aquifers, supplying domestic water sources to the cities and towns surrounding the Coronado National Forest. Please study justification of mining versus impact on aquifers and community water supplies.

C.There are priority needs for change in program direction, ecosystem restoration, safety and information, public access and travel patterns, preservation of open space, and collaboration and partnerships

D.The S32 project is not a use identified in the plan as suitable for the location (the plan is silent on the use or the plan identifies the use as not suitable), but the responsible official determines that the use is appropriate for that location's desired conditions and objectives. Monitoring is part of an adaptive management process that measures the performance of plan implementation against the goals and desired conditions and objectives to

which it aspires. Please address use plan suitability as well as defining physical and other adaptive monitoring processes utilized over time.

E. Increasing water conservation and planning for reductions in upland water supplies. This includes identifying the water rights status of water resources (for range, wildlife, public drinking systems), water for fire management activities, recreational uses, and aquatic habitats; and reviewing the status of State and regional water plans, forest and watershed health plans, and integrated regional water planning efforts. Please study different stakeholder water plans and then the integration for a comprehensive water plan.

F. Per FS plan, new road construction in riparian areas should be avoided, except to cross drainages, unless alternate routes have greater overall resource impacts. If road construction in riparian areas is unavoidable, it should be designed and implemented to minimize effects to natural waterflow, aquatic species, channel morphology, and native vegetation communities. Please study the effects of planned construction on drainage-related issues and impacts.

G. In FS plan, there are Special Uses General Descriptions noting that all utility lines connecting to communications sites will be buried underground. New or reconstructed utility lines should be placed underground, when possible, to protect scenic resources, unless this is not feasible because of overriding environmental concerns or technical considerations. New electric transmission lines and natural gas pipelines should be in existing corridors that meet the scenic integrity objective. Existing corridors that do not meet the scenic integrity objective should be relocated when construction becomes necessary. Please study and address power, communication and natural gas lines effects on scenic integrity and risks of fires.

H. Per FS plan involving Locatable Mineral Withdrawals when recommending a new withdrawal or renewing an existing withdrawal, alternative protection opportunities such as the issuance of a right-of-way under Title V of the Federal Land Policy and Management Act or notation in the public land records should be explored and sufficient analysis, justification, and determination of need provided. Please report on Title V study results.

I. Per FS plan, Monitoring Opportunities to complete monitoring and evaluation activities through partnerships and citizen collaboration are examined on a regular and ongoing basis. Please study and share with the public the monitoring opportunities and process.

J. Per FS plan, one of the goals is to address increased energy demand in general and the ensuing demand for alternative energy and how it will likely impact the Coronado National Forest through growing needs for new energy corridors, requests for wind and solar energy sites, and other special use related requirements, as well as the current and ongoing demand for biomass supplies to existing electrical cogeneration plants. Please share specific plans to address alternative energy plans as well as those tied to S32 versus current Natural Gas generators and planned utility power and mix of renewables.

K. The five FS potential management strategies described in the following relate to the five projected, key climate change factors that are most likely to be a potential concern for the Southwestern Region and Coronado National Forest in moving toward the desired conditions in the plan. These are extreme weather events, wildfire and human-caused risks, insects, diseases, and invasive species, water use and demand, and increase in socioeconomic demands. Please study and share planning to address the five climate change factors.

L. As noted in the FS plan, the Mineral Leasing Act of February 25, 1920, provides that the deposits of certain minerals on land owned by the United States shall be subject to lease to citizens of the United States, provided royalties on such deposits are paid to the United States. Please study and advise of the royalty schedule for the Hermosa Mine.

M. U.S. Mining Laws (Public Domain Lands) Act of May 10, 1872: Provides that all valuable mineral deposits in

lands belonging to the United States, both surveyed and un-surveyed, are free and open to exploration and purchase, and the lands in which they are found to occupation and purchase by citizens of the United States and those who have declared their intention to become such, under regulations prescribed by law, and according to the local customs or rules of miners, so far as the same are applicable and not inconsistent with the laws of the United States. There are several acts that modify the mining laws as applied to local areas by prohibiting entry altogether or by limiting or restricting the use which may be made of the surface and the right, title, or interest which may pass through patent. Please study and report on adherence to all related laws and regulations.

N.Per S32 requests for Forest Service approval, underground mining under FS lands include the backfilling workings with a cement paste. Please study the chemical makeup of the product, its effect on underground water aquifers, the carbon balance of using cement products (one of highest producers of carbon when made, and materials utilized in the mixture.

O.Per S32, mineral exploration would continue under FS land indicating that ore reserves, and future mining operations are unknown at this time rendering the current Plan of Operations and all related risks inaccurate. This does not follow FS plans of allowing speculation on public lands. Please study this approach of allowing exploration without known costs / benefits to the public.

P.Per S32, a permanent tailing storage facility is planned for FS land with acid generating waste and other waste material. This is distressing knowing the global history of S32 in their other operations are the globe. Please study the effects of dry stack waste in the industry and best practices of remediation and restoration to natural standards and scenic integrity before versus afterward.

Q.Per S32, infiltration basins will be constructed while continuing to discharge water into Harshaw Creek. Please study the effects of the discharge plan on downstream water amounts, effects on aquifer levels and the endangered minnows in all discharge areas.

R.Per S32, dewatering wells are to be constructed on FS land. Please note that USGS does not count dewatering amount as use, so actual groundwater pumping is comparable to other mines in the area and depletes water in aquifers. Please study well locations and amounts per location, as well as treated water effect on aquifers and available water for the community (wells, springs, shallows).

S.Per S32, a new Primary Access Road and numerous other temporary access roadways are planned to be constructed on FS land that will be mixed use public and mine traffic. This routing has many issues, and mine management has indicated to numerous stakeholders that the planned routing will be different. This renders the current Plan of Operation incorrect and incomplete. Please study all affected roadways on FS land including Harshaw Road and what is called the Primary and exploration roads for environmental, scenic integrity, wildlife disruption, noise, light ,human and animal safety.

I would like to thank the USFS for the opportunity to comment on this important issue. I and the members and supporters of the Calabasas Alliance are vehemently opposed the any manganese processing facility in Santa Cruz County and do not believe that manganese should be extracted without proper legislation and laws regulating and overseeing the full supply chain of the dangerous mineral.

Sincerely,
Robin Lucky