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Comments: Re: Hermosa Critical Minerals Project #65668

We request review and consideration of the following comments and concerns re the Proposed Plan of Operations:

1. Groundwater resources: extraction, use, management and monitoring

The PPO states "During mining it is expected that groundwater recovered from groundwater management will exceed operational use". Further study is essential prior to project approval to identify the short and long term impact of extraction of water : what is the current consumptive use of the aquifers in the region (include all uses both permitted/monitored by the State (e.g Towns, Cities, commercial) and those not monitored, that may be affected by significant future extraction by South 32 (residents in the area that own property outside the service area of a permitted water system rely on domestic wells that are at varying depths; the study should identify all of the current wells and take into consideration the potential number of future residents per current Santa Cruz County zoning regulations, that could rely on domestic wells.

Up to 6 monitoring wells are proposed; further study is necessary prior to approval of the project, to identify the interconnectedness of the aquifers in the region to better identify the impact that extraction at the mine will have on existing wells in the Patagonia Mountains. The study should also include the most effective locations for application of treated water based on the aforementioned proposed studies.

2. Roads and Traffic.

1. Maintenance: the current impact on Harshaw Road of employee and truck traffic (e.g. pot holes, displaced gravel, chasms at creek crossings, is evidence that the study on the impact of traffic on existing roads and the resulting agreement with the County for maintenance is inadequate. Prior to the approval of the PPO a more in depth traffic study should occur that must include:

a. The true impact of heavy truck traffic through each phase of the project on road surface, road width, noise, dust, surface runoff. This study should then result in a maintenance schedule on roads that South 32 will be maintaining and measures to mitigate adverse impacts

b. Current traffic use (vehicles and recreational use (bicycles and ATVs) and resulting safety measures (e.g culverts, signs, extra width) that must be implemented

Respectfully submitted,