

Data Submitted (UTC 11): 6/9/2024 8:55:29 PM

First name: Julie

Last name: Arma

Organization:

Title:

Comments: RE: Scoping Comments for Hermosa Critical Minerals Project EIS

I am writing to express my comments regarding SOUTH32 HERMOSA INC. a Foreign For-Profit (Business) Corporation, Domicile State: Nevada (<https://ecorp.azcc.gov/BusinessSearch/BusinessInfo?entityNumber=F12334965>) to construct and operate the Hermosa Project, NFS EIS Scoping Period for the Hermosa Critical Minerals Project #65668. I thank you for the opportunity to submit my comments

The air we breathe, the water we drink the very land beneath our feet is in jeopardy. If allowed the goliath Australian mining company South 32 will change Santa Cruz County and the National Forest forever.

I am worried about the precedent that is being set with the Hermosa mine, and how that is going to affect future projects and the beautiful environment an area that is a global biodiversity hotspot in the "Sky Islands" region. It is essential that irreplaceable landscapes such as the Patagonia Mountains not be sacrificed. That's why I urge you to give this project especially careful review.

Please review carefully and consider the following comments,

Biodiversity - The Patagonia Mountains and area around the town of Patagonia are home to more than 100 imperiled species of plants and animals. It's the duty of federal agencies to prevent their extinction. Biodiversity is also essential to the region's nature-based restorative economy, which attracts outdoor enthusiasts for hiking, cycling, and wildlife viewing. I have specific concerns about the potential impacts the Hermosa Project will have on Wildlife, the dewatering process, air pollution, habitat destruction from road construction, artificial light, noise, and vibrations. I ask that all these areas of concern are reviewed and a multi-year survey be conducted especially in regard to US Fish and Wildlife listed threatened and endangered species and with special attention to springs and riparian zones.

Endangered Species: A Jaguar has been recorded in Southern Arizona Dec, 20, 2023 Patagonia is easily within the range of this Jaguar. This sighting has been authenticated by Fish and Game, Mark Hart. I believe this information is critical to be included in the EIS and any decisions regarding permitting for the mine.

Water -Threatened wildlife in the Patagonia Mountains rely on groundwater to survive. Dewatering for mining could be devastating, destroying local springs and streams that wildlife rely on and many sensitive species live in. Also increasing wildfire risk significantly.

Discharging of up to 6.48 million gallons of mine water per day into Upper Harshaw Creek and 172,000 gallons of mine water per day into Alum Gulch, potentially polluting groundwater throughout Santa Cruz County. Although the waste water is partially treated some minerals, heavy metals that will be entering the ground water do not have strict regulations. A seven mile cone of depression, dewatering, light pollution, noise etc... all negatively impact wildlife and the land.

Bringing such an enormous amount of water to the surface, potentially impacts flood plains throughout Santa Cruz County effecting FEMA insured areas. I ask that the impact of this discharge be considered and studied. As well as the quality of water available to both humans and wildlife.

Fire and Flood -

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

Given that Fuel would be stored on the drill pads in 5-gallon steel safety cans, 2-28 MOP please review how dangerous materials will be stored especially in regard to starting or during a fire.

Dewatering, a seven mile cone of depression will greatly increase the potential for wildfires. Please study the impact and potential impact the mine will have on wild fires.

Seismology impacts: if the water is continuously removed over the next 60 + years, the weight on the crust of the earth will change possibly causing earthquakes, land subsidence and many fissures.

USGS lists Patagonia as 3 out of 5 Hazard Zone for earthquake. Please study the potential for Earthquakes and require seismology monitoring and an earthquake emergency plan if this project is to be approved.

Environmental impact on the air. I have seen first hand here in Tubac, AZ the limitations of ADEQ authority regarding air pollution. Tubac and Santa Cruz County in 2021 was subjected to weeks of air pollution dust of which ADEQ could not protect our community, limited by specific DOCS opacity reading requirements. Despite numerous inspections Bali Vaidyanathan, Facilities Emissions Control Value Stream Manager was only able to enforce the current opacity regulations which did not prevent Tubac being continuously subjected to air polluting dust.

How are the current regulations and requirements of the permitting for Hermosa mine going to protect Patagonia, the National Forest and the surrounding area from the same situation? Page 27 of the Draft Permit No. 96653 states "The opacity of any plume or effluent from any existing, stationary point source shall not be greater than 20%. I understand what an opacity reading of 20% looks like, photos are included in the numerous inspection reports in 2021, terrible!

This is the air we breathe! The toxic catastrophic air pollution potential in allowing 20% opacity for a mining operation is NOT acceptable.

A system of self monitoring is not acceptable given the potential for environmental contamination.

You cannot take the air pollution out of the air once the event has happened, and we are all left breathing in the consequences etc.

I ask that all permits in regard to this project be reviewed as part of the NFS EIS process, to ascertain the potential harmful consequences that will impact the National Forest and surrounding area. If this project is to proceed that an independent monitoring system be required 24/7 as part of the approval requirements and the opacity be reduced to zero.

Roads, Traffic and infrastructure: please review the comment from Santa Cruz County "Hermosa Project-related traffic and congestion will foreseeably impact the region. Vehicle traffic associated with the mine has the potential to increase overall traffic levels and change traffic flows in the region, and to lead to an increased risk of vehicle accidents resulting in injury. With heavier use, roads will also likely become more expensive to maintain. Mine-related traffic may also change patterns of service throughout the region. Mine operations will potentially use rail which will foreseeably increase the risk of a rail accident. Effects on transportation, access, maintenance and infrastructure foreseeably includes short-term impacts during construction and operation, as well as long-term impacts during the reclamation and post-closure phases.

Please study the impact the Hermosa Project will have on traffic and transportation infrastructure in the region. We recommend a study of regional traffic projections in detail. Please also create a regional traffic model that anticipates levels of service that exceed County standards, and where these occur a mitigation plan should be studied. Please also study road-related & infrastructure-related (i.e. rail) regional emergency response capacity & planning in detail. As an alternative to the new road presented in the mine plan of operation, a Lochiel option

is preferred. Please study the viability of a route that heads south from the Hermosa Project and avoids major roadways using the already established Forest Service Road 49 to Lochiel. Please also study ways to mitigate impacts of mine traffic on Harshaw Road. Recreational users (including cyclists), ranchers, border patrol, nearby homeowners, and others use this road daily. Please explore how this road can be widened and/or upgraded to accommodate these multiple uses safely."

I ask that a review and complete impact study be made for the traffic going through the National Forest.

Page 2-87 of the Mine Plan of Operations indicates 234 large truck trips per day, or nearly 10 trucks per hour, and counting light vehicles and buses, about a vehicle every six minutes, 24 hours per day for over 60-years. This is over 118,260 large trucks per year or over 5,128,100 large trucks on SR-82, the Arizona's first Scenic Highway. This will have a negative impact on the National Forest, as the traffic goes through it.

NFS Land disturbance:- Drill pads 150 x 150' will negatively impact the National Forest. 1-11 MPO states 480.4 acres of disturbance. Some areas fenced. This is not acceptable and will greatly impact the National Forest especially wildlife. The impact of fencing and land disturbance must be studied, I do not believe it is aligned with the mission of the NFS to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations.

Cumulative Impacts - The Forest Service is required to analyze the total impacts of all reasonably foreseeable actions as they relate to this project. Currently, the lack of adequate cumulative impact analysis in a recent environmental assessment for the Barksdale Resources Sunnyside project is being considered by U.S. courts. The Sunnyside project is less than a mile from the project boundary. I ask that the Forest Service analyze the total impacts of all reasonably foreseeable actions as they relate to this project.

Due Diligence - South32's Hermosa project is the only hardrock mine listed under Fast-41. However, that nomination is not approval, and the listing was made in advance of the now required environmental review. To meet expected standards, the Forest Service should follow the UN Guiding Principles on due diligence.

Thank you for your careful consideration of these comments and all that's at stake with this proposal. I care deeply about the National Forest and Santa Cruz County and urge you to do everything in your power to see that it remains protected.