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Title:

Comments: Sunday, June 9, 2024

Kerwin S. Dewberry

Forest Supervisor

Coronado National Forest

ATTN: Hermosa Critical Minerals Project

300 W. Congress St.

Tucson, AZ 85701

Subject: Protect the Patagonia Mountains from Destructive Mining -- Hermosa Critical Minerals Project #65668

To Secretary of Agriculture Tom Vilsack, US Forest Service Chief Randy Moore, and Coronado National Forest Supervisor Kerwin S. Dewberry:

I strongly oppose South32's Hermosa Project in the Patagonia Mountains and urge Coronado National Forest and the U.S. Forest Service to reject South32's request for a permit. The region is a global biodiversity hotspot in the "Sky Islands" region on the border with Mexico. As a former resident of southeastern Arizona, the protection of the Sky Islands' ecosystems and biodiversity is important to me. This project is the first hardrock mine subject to the federal Fast-41 program which aims to speed up permitting for certain energy projects.

As society works to mitigate the impacts of climate change, it is essential that irreplaceable landscapes such as the Patagonia Mountains are not sacrificed. That's why I urge you to give this project especially careful review on the following fronts:

BIODIVERSITY:

The Patagonia Mountains and Patagonia area are home to more than 100 endangered, threatened, and sensitive species of plants and animals. It is the duty of federal agencies to prevent the extinction of these species.

Biodiversity is essential to the region's nature-based restorative economy, which attracts outdoor enthusiasts for hiking, cycling, and wildlife viewing.

WATER:

As in many parts of the arid west, threatened and endangered wildlife in the Patagonia Mountains rely on groundwater to survive. Dewatering for mining could be devastating.

The proposed project would discharge 6.84 million gallons of water per day into Harshaw Creek as part of their dewatering operations. The plan would disrupt a sensitive ecosystem both as species adjust to increased flows, then again during post-closure when these increased flows cease.

CUMULATIVE IMPACTS:

The Forest Service is required to analyze the cumulative 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 US courts. The Sunnyside project is less than a mile from the project boundary.

RECREATION ECONOMY:

The town of Patagonia benefits from a vibrant eco-tourism industry that's dependent on a healthy ecosystem. Increased truck traffic, noise, light pollution, land degradation, and harms to flora and fauna all threaten to

undermine this sustainable economy and must be taken into account.

FEDERAL SUPPORT AND DUE DILIGENCE:

The Hermosa mine and South32 are receiving unique federal support as the only hardrock mine included in Fast-41. This federal support was given in advance of environmental review because the aim of Fast-41 is to reduce permitting times, but that is no excuse to forgo robust environmental analysis and human rights due diligence. To meet expected due diligence standards the Forest Service should follow the UN Guiding Principles (UNGP's) 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 this part of the Sky Islands and urge you to do everything in your power to see that it remains protected. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA