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Comments: I am writing to share concerns and provide feedback to Coronado National Forest regarding permitting of South 32's Hermosa Project in the Patagonia Mountains. The region is a global biodiversity hotspot in the "Sky Islands" region on the border with Mexico. This project is the first hardrock mine subject to the federal Fast41 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.

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 recreation economy that is dependent on a healthy ecosystem. Increased truck traffic, noise, and light pollution, and impacts to flora and fauna can all impact this recreation economy.

Federal Support and Due Diligence

The Hermosa mine and South 32 are receiving unique federal support as the only hardrock mine included in Fast41. This federal support was given in advance of environmental review because the aim of Fast41 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 (UNGPs) on due diligence.

Thank you for your consideration of these comments.