

Data Submitted (UTC 11): 6/10/2024 7:05:39 PM

First name: Carol Milligan and

Last name: Eric Findeis

Organization:

Title:

Comments: We are requesting that the concerns listed below are addressed to ensure that the mine, federal, state and local agencies take appropriate action (as outlined in National Environmental Policy Act Sec. 101 [42 USC § 4331]) to 1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; 2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings; 3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; 4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice; 5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and 6). enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

We ask that particular attention be paid to area residents, environment and local communities of Patagonia and Santa Cruz County as they will be directly and most impacted by the South 32/Hermosa mine's construction and operation.

1. Protection of the Water Table for Residents. What protections will be in place to address resident concerns over potential loss of water supply by the mine's removal and relocation of that precious water from the water table? The mine proposes that the water will infiltrate back into the aquifer, but this is conjecture, and even counterintuitive with most pavement soils, that must be monitored with contingency plans. Will South 32/Hermosa be required to provide compensation for residents if area wells run dry over the next +/- 10 years because of mining operations and dewatering? While the mine will ensure its production and profits, what will happen to regional housing costs and economy if there is a loss of water supply? Foresight and planning will be most effective and cost efficient in the long-run.

2. Water Table Stability for the Environment. The Hermosa project rests in the middle of an important Habitat/Migratory Corridor. In addition to the environmental concerns, Ecotourism is important to the region. Related to above, what monitoring will be performed to determine how the mine's pumping of water affects area water table levels and consequent ecological issues 1, 5, 10, 20 miles away from the mine, etc?

3. Mining and Noise Pollution. How will construction and subsequent underground mining affect noise levels range from those onsite, to 1, 5 and 10 miles away? How loud will 24-7 mining operations (including blasting) be? Will there be flexibility in mining operational use of types of explosives, size of explosions, and timing of blasting? We are not able to find any information to answer this question. There must be information available as similar mining operations occur worldwide.

4. Blasting and Geological Stability. Related to #3, how will underground blasting affect area homes and businesses in terms of structural integrity? Will area residents "feel" blasting? How will this feel in terms of earthquake levels? How will this be monitored? What compensation will be provided to homeowners if/when damage related to geological changes occur?

5. Fire Risk. The increased human activity associated with construction and ongoing activity of the mine on both private and public lands raises the risk of wildfires in the community. What preventative and reactive measures will be imposed to help mitigate these risks?

6. Environmental Hazards. The Hermosa plan is touted to be a safe example of 21st Century Mining. There are omissions in the plan, however, in regard to on-site Ore Processing and Transportation. Oversight is essential to hold South 32 to their promised standards for safety of the Patagonia region and as "Proof of Concept" of their Mining Protocols. Construction and ongoing activity of the mine open risks of environmental hazards related to soil, water and air quality that will have potential long-term impacts on wildlife, plants, and residents. What preventative and reactive measures will be imposed on South 32 to help mitigate these risks. Who will monitor and enforce adherence to standards? How will the company be held accountable?

7. Risk of fires posed by the Hermosa project's proposed high-voltage transmission line. The high-voltage

transmission line will be an above ground line. While there are obvious concerns regarding environment and scenery, these lines are susceptible to weather/wind that can lead to catastrophic consequences, such as wildfires. Alternatives to above ground lines should be explored and evaluated.

8.The impacts to area residents, environment and local communities associated with the Hermosa mine are regional in scale and must be evaluated fully. The Mine Plan of Operation does not appear to study impacts outside the immediate site of operation. We ask that the affected environment be expanded to include the Patagonia and surrounding region, Santa Cruz County and as appropriate, portions of Tucson/ Pima County.

9.We ask that the forest service extensively evaluate the wild-life and botanical impacts of the Hermosa Project to ensure compliance with the endangered species act and all other federal and state regulations.

10.Monitoring programs should be required. History documents there is no doubt that there will be significant effects of the mine's operations on regional water quality, water quantity, air quality, noise, fish and wildlife. Monitoring programs should be studied and recommended by the EIS to ensure safety and a balance between current and future regional population and national and international resource use. Monitoring should be done by independent third-party contractors. It is reasonable to require that all monitoring be paid for by South32/Hermosa, but not employed or managed by them. A public agency should have authority to require the monitoring and make all results public on a regular basis.

Thank you for your attention to these comments and concerns.