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Comments: Thank you for this opportunity to comment on the South 32 Hermosa Critical Minerals Mining Plan of Operations (MPO) and Scoping Document. The Huachuca Gould's Chapter of the National Wild Turkey Federation offers the following points to be considered in the draft Environmental Impact Statement (EIS):

- 1) Alternatives developed should include one for just disturbance on National Forest land limited to reclamation of waste products, water discharges, and construction of temporary roads and drill pads. Such an alternative would present a contrast of project effects compared to full implementation of the MPO and a no action alternative. Such a contrast would highlight effects from construction and use of a primary access road to State Route 82 and Harshaw Canyon Road, also.
- 2) Another alternative should discuss a land exchange of affected Forest land and appropriate private parcels that mitigate habitat loss.
- 3) The section of the MPO discussing special status species considered in designing protection measures is weak. Only designated critical habitat for federally listed species is shown in Figure 3-2. A full list of species considered with effects by each alternative should be included in the draft EIS and its appendices. That information should include specific dates for supporting surveys and determination of absence or presence.
- 4) Effects analysis of alternatives should consider impacts on game species, including habitat alteration, as well. The Huachuca Gould's Chapter is particularly interested in effects on current, potential, and future roost sites and water source for Gould's Turkey in the project area. Will roost sites be eliminated with construction of temporary and permanent roads? Will Chihuahuas and Apache Pines and Madroño Oaks be planted on reclaimed areas? These trees and other woody, native vegetation are not shown in the reseeding/planting list. What quantitative effect will a water table drawdown have on water sources? The Arizona Game and Fish Department should be able to provide the current status of the species, also.
- 5) Specifically for the Black Bear what methods of trash containment will be practiced? For all wildlife, what other avoidance measures at waste and remediation sites are planned?
- 6) Each alternative should present information that includes use and discharge water balance. And how much will the water table drop during the life of the project?
- 7) Alternative analysis should consider downstream effects of increased flow from discharge of reclaimed water. For example, will increased flow in Alum Gulch push more noted contaminants downstream? What changes in vegetation will occur?
- 8) For alternatives that include construction of the primary access road to State Route 82 and use of Harshaw Canyon Road, what will be the effects on recreation use on National Forest land in the area?
- 9) What will be the impacts on wildlife associated with, but not limited to, heavy trucks, heavy equipment, and heavy machinery for each alternative? Generated noise and other physical disturbances are such impacts in the immediate mining-remediation area and along access routes. What will be the total heavy truck/equipment traffic for each major access route, also?
- 10) Monitoring responsibilities of the Forest Service for each alternative during the life of the project should be shown. The noted life of the project, 30 to 70 years, represents quite a long-term commitment of National Forest lands.

While the importance of good paying jobs to the economy of southeastern Arizona and the availability of critical minerals are recognized, the complexity of the South 32 Hermosa Critical Minerals Project requires a detailed analysis of effects by alternative in the draft EIS.