

Constance Paris

Dear AzDEQ:

I feel like this will fall on deaf ears, but please, please listen to those of us living in the area and PLEASE deny South32's Hermosa permit (#AZ0026387) for discharge of mine water into Harshaw and Alum creeks. The proposed impacts are unacceptable and fall into two main categories: 1) dewatering due to the "cone of depression" that would be created around the mine and 2) disturbances that would come from dramatically increased flow rates in nearby creeks.

The destruction that has already begun will negatively impact the entire area. The significant drop in the groundwater level in the area will permanently drying natural springs. Trees will die. Animals will dry. People's wells will dry - as will their home value.

The forecasted water discharges are also deeply concerning. Six million gallons of water per day could be forced down Harshaw Creek and up to 172,000 gallons per day down Alum Creek. These volumes are significantly higher than current, intermittent, base flows. This will lead to severe erosion upstream, excessive sediment loads downstream, and the burial of several important water sources such as the seven rheocrene seeps and springs known in Harshaw Creek and the nine rheocrene seeps and springs known in Alum Creek. These harms are particularly concerning because springs are such unique ecosystems with high biodiversity. Their destruction will affect endemic species to an unknown degree because the sites haven't yet been adequately surveyed. Some estimates suggest that refugia like these support more than 20% of endangered and threatened species, despite making up a much smaller proportion of the land surface area (Springs Stewardship Institute).

Although water in the desert is a rarity, and one would think that increased flow would help our streams, because of the sensitive ecological balance of these riparian ecosystems, a change in flow regime this drastic could permanently alter the character and species composition of these areas.

South32 and its representatives are glib, snake-oil salesmen. They promise the highest, best, cleanest technology then quietly slide-in that the technology is "conceptual" only. They will divert your attention by telling you all the wonderful ways they plan to "clean" the water, but fail to mention the destruction caused by their practices.

Please, I urge you to deny the permit for this project. For a look at South32's impact in other countries, please watch the news expo published on YouTube called "The Manganese Road".

Sincerely,

Constance Paris