

Elijah Tangenberg

Dear Arizona Department of Environmental Quality,

I'm writing to urge you to 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. Especially now when the public is growing aware how Arizona's groundwater supplies are overexploited, approving permits like this makes the State appear deaf to the harm caused by these projects.

Dropping the groundwater level in an area like this would be highly destructive, changing where springs emerge, the region's biodiversity and overall resiliency. It would not just be a loss of a unique ecosystem, but also the degradation of a watershed important for local residents. While filling local intermittent creeks may appear to offset these concerns, the resulting erosion upstream, excessive sediment loads downstream, and the burial of several important water sources would further undermine these delicate ecosystems and lower tree recruitment. Furthermore, 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).

As the people inside and outside of the State have become aware of the lack of groundwater regulations outside of Active Management Areas (such as the Saudi Arabian-owned farms), there is growing concern about how these permits are reviewed. Allowing this permit to be approved would only support the arguments of ADEQ's opponents, bringing further attention to these issues and distracting from the Department's groundbreaking work in other areas of the state. I would hope that ADEQ would be aware enough of the larger conversations surrounding groundwater use not to get unnecessarily mired in these highly political discussions.

For all these reasons, I urge you and the Arizona Department of Environmental Quality to deny the permit for this project.

Sincerely,

Elijah Tangenberg