

Arizona Trail Association

As the organization responsible for the protection and maintenance of the Arizona National Scenic Trail, we object to the Arizona Department of Environmental Quality's (ADEQ) plan to renew the Arizona Pollutant Discharge Elimination Permit (AZPDES) No. AZ0026387 for South32's Hermosa Project mine. Our primary concerns are impacts to groundwater health on the Coronado National Forest, and within the Town of Patagonia – both of which are vital resources supporting the Arizona Trail.

The proposed permit would allow for dangerous discharges of water into Harshaw Creek, Alum Gulch, and Sonoita Creek, potentially compromising the health of local residents and public lands nearby. This may be in violation of the Federal Clean Water Act and Arizona's surface water quality laws. The issuance of the permit is also contrary to ADEQ's own rules which require ADEQ to:

- act to protect the environment
- promote the protection and enhancement of the quality of water resources
- provide for the prevention and abatement of all water and air pollution
- ensure the preservation and enhancement of natural beauty in our state

The Arizona Trail Association recognizes the importance of the mining industry to maintain a diversified economy within rural communities. In addition, we are supportive of mining projects that are socially and environmentally responsible – especially when the project proponent can offset their negative impacts through proper mitigation measures. We also understand the Biden Administration has prioritized this particular project to support the harvesting of critical minerals. However, the negative impacts to water resources on public lands and within the local community are alarming and require further hydrological analyses and sufficient monitoring protocols before the AZPDES is issued.

Impacts to springs and ephemeral streams in the Patagonia Mountains increase the risk of uncharacteristic wildfires, compromising forest health, wildlife, and Arizona's outdoor recreation industry, which contributes over \$18 billion to our state's economy each year. Additionally, if groundwater levels continue to drop or contain harmful contaminants, the Town of Patagonia's very sustainability may be threatened. As one of the most important gateway communities along the Arizona Trail, our organization is very invested in preserving the quality of life within the Town for locals and visitors alike.

We trust ADEQ to enforce the discharge provisions of the Clean Water Act to protect human health and the environment as required by law. Please comply with Total Maximum Daily Load (TMDL) rules required by the Clean Water Act so that the contaminated waters of Harshaw Creek, Alum Gulch, and Sonoita Creek can be returned to good health.

The Arizona Trail Association (ATA) is an Arizona nonprofit organization whose mission is to protect, maintain, enhance, promote and sustain the Arizona Trail as a unique encounter with the natural environment. The 800-mile trail spans the length of the state from Mexico to Utah, connecting deserts, mountains, canyons, forests, communities and diverse peoples. It was designated a State Scenic Trail in 2006 and a National Scenic Trail in 2009. Patagonia is one of 19 designated Arizona Trail Gateway Communities. The ATA works in collaboration with county,

state and federal land management agencies, municipalities, volunteers, industry partners, elected representatives, private property owners, and many others to ensure the protection and sustainability of the Arizona Trail for the benefit of all.

Thank you for considering our objection, and please keep me informed throughout the permitting process.