

The Great Spirit created Man and Woman in his own image. In doing so, both were created as equals. Both depending on each other in order to survive. Great respect was shown for each other; in doing so, happiness and contentment was achieved then, as it should be now.

The connecting of the Hair makes them one person; for happiness or contentment cannot be achieved without each other.

The Canyons are represented by the purples in the middle ground, where the people were created. These canyons are Sacred, and should be so treated at all times.

The Reservation is pictured to represent the land that is ours, treat it well.



The Reservation is our heritage and the heritage of our children yet unborn. Be good to our land and it will continue to be good to us.

The Sun is the symbol of life, without it nothing is possible – plants don't grow – there will be no life – nothing. The Sun also represents the dawn of the Hualapai people. Through hard work, determination and education, everything is possible and we are assured bigger and brighter days ahead.

The Tracks in the middle represent the coyote and other animals which were here before us.

The Green around the symbol are pine trees, representing our name Hualapai – PEOPLE OF THE TALL PINES –

HUALAPAI TRIBE EXECUTIVE OFFICES

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Chairman

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Ronald Quasula, Sr.
Vice Chairman

July 14, 2025

Sent via Electronic Mail

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Re: Follow Up to Consultations on Antler Copper Mine and Powerline Project

Dear Director Czecholinski and Director Baggioro,

I write on behalf of the Hualapai Indian Tribe of the Hualapai Indian Reservation ("Hualapai") to thank the Arizona Department of Environmental Quality ("ADEQ") for consulting with the Hualapai Tribal Council on April 17, 2025 and June 16, 2025 concerning the proposed Antler Copper Mine and Powerline Project ("Project"). The Project is proposed for the southern foothills of the Hualapai Mountains, which are sacred to our People and located wholly within Hualapai's traditional territory. Hualapai has a significant interest in ensuring that the Project proceeds, if approved, in a lawful and responsible manner, so we appreciate the opportunity to discuss ADEQ's review of, and regulatory authority over the Project.

Since time immemorial, the Hualapai People have lived and thrived throughout a vast cultural landscape in northwestern Arizona that includes the Hualapai Mountains, among other areas. During proceedings before the Indian Claims Commission, Hualapai Elder Auggie Smith testified that "[t]here was a lot of Hualapai families that lived in this area [referring to the Hualapai Mountains][.] [s]outh of Beale Springs . . . before the white man came there was a lot of Indians . . . Hualapai Indians." The Hualapai Mountains feature our archaeological sites and other sacred

places, our traditional foods, medicines, and water resources, and remain essential to our religious practices and beliefs.

Antler Operations, Inc. ("Applicant") proposes to construct, operate, reclaim, and close an underground polymetallic mining operation on private and public lands within our traditional territory. The mining operation would focus on copper and zinc, and would include extralateral mining beneath the Wabayuma Peak Wilderness Area. Applicant's mine would be supported by UNS Electric, Inc.'s construction of an 11.6 mile power transmission line extending to the Project Site. Additional ancillary services include installation of 3.9 miles of an eight-inch diameter underground water supply line, 2,088 linear feet of fencing, 570 linear feet of haul road, the sealing of Borianna Mine Road, and the resulting vehicle traffic and mining operations that these ancillary services support.

As we discussed during the consultations, Hualapai wants to ensure that the Project, if approved, does not result in an unlawful degradation of air or water quality in and around the Project site. We are concerned that the Project will result in the emission through air, and discharge through water, of pollutants that could harm Hualapai's natural and cultural resources located within the vicinity of the Project. This includes pollution in the form of dust generated from the processing and transportation of extracted minerals, the concentration of pollutants in the Project's evaporation ponds over time, and the potential groundwater impacts from the mining operations and polluted water storage at the site. The Project's impact to the source aquifer should also be monitored to ensure the long term stability of the aquifer's water level and quality.

ADEQ has modeled the Project's potential to result in unlawful emissions and discharges, and we ask that ADEQ vigorously monitor the Project throughout its life to confirm that emissions and discharge standards are not exceeded. There will be air or water quality impacts from the Project, and the Applicant should be required to mitigate for those impacts to Hualapai's traditional territory and the natural and cultural resources located therein. Mitigation should include the Applicant providing sufficient funding for Hualapai Staff to join ADEQ during site visits to monitor environmental and cultural resource conditions at and around the Site. The Applicant should provide funding for Hualapai to conduct an ethnographic report and traditional cultural property study for the southern Hualapai Mountain area, including gathering oral testimony from Hualapai Elders. The Applicant should also maintain or secure access for Hualapai Members to visit sacred sites located in the immediate vicinity of the Project, both during the life of the Project and following mine reclamation.

The Hualapai Mountains are sacred to the Hualapai People. We look forward to working closely with ADEQ to ensure that Hualapai's interests are both considered and protected throughout the life of the Project, if approved. If you have any questions, please contact Ms. Ka-Voka Jackson, Director of the Hualapai Department of Cultural Resources, at ka-voka.jackson@hualapai-nsn.gov.

Hualapai Indian Tribe Consultation Response Letter re Antler Copper Mine
July 14, 2025

Respectfully,



DUANE CLARKE, CHAIRMAN
HUALAPAI TRIBAL COUNCIL

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