

David DeGroot

Copper World's present plan for dust control on Santa Rita Road is unacceptable and possibly illegal. As mine operations commence, Copper World's heavy trucks will begin to make dozens of trips – possibly up to 100 per day – up and down Santa Rita Road, which is a two-lane dirt road 30 meters wide. Already, commercial trucks and private vehicles use this road, and anyone in Green Valley, Sahuarita, Corona de Tucson, or Vail can observe clouds of dust from each vehicle. These dust clouds drift across the landscape, often in a northwesterly direction. As mine operations commence, therefore, fugitive dust may exceed measurements allowed by National Ambient Air Quality Standards (NAAQS). I understand that the Arizona State Land Department has given a "Special Use Permit" to Copper World that requires Copper World to comply with all national, state, and local laws, including laws stipulated by the Pima County Department of Environmental Quality (PDEQ). According to a Sept. 11, 2024 letter from Pima County Administrator Jan Leshner to the ADEQ, Copper World does not have a satisfactory dust mitigation plan for Santa Rita Road. This lack of a plan for Santa Rita Road is unacceptable and possibly illegal. The ADEQ should, at the very least, require Copper World to obtain approval from PDEQ before proceeding any further with its plans.