

# Lynn Harris

The proposed Copper World mine location is in the worst possible place: 1) immediately adjacent to an urbanized area with several schools, and thousands of existing homes and businesses; 2) immediately adjacent to US Forest Service land which is renowned for being ecologically diverse; 3) immediately adjacent to public land which was mandated to be left as undisturbed grassland habitat in perpetuity, (and monitored by the University of Arizona Agricultural College), for researchers to study sustainable grazing methods.

For all of these reasons, ADEQ must require Hudbay Minerals to meet or exceed the highest level, most stringent, requirements for air quality. This mine must be made to comply with a Class I permit at the very least.

Furthermore, monitoring of the Class I permit requirements must be done by a non-biased 3rd party testing agency/lab--not by Hudbay Minerals. Their record of non-attainment in some of their existing mines makes it obvious that "self reporting" is a poor strategy.

There are many years' worth of documented incidents of poor air quality in the Green Valley/Sahuarita region, which are usually recorded in the spring/early summer in the vicinity of the Duval Mine tailing piles. It is obvious that adding more tailing piles created by Hudbay's Copper World project will exacerbate an already bad situation. There is a high population of elderly people already living in Green Valley, Corona de Tucson, Sahuarita and Quail Creek who are particularly susceptible to respiratory diseases caused by poor air quality. In addition, there are several schools within a few miles of the Copper World site. These children will be inhaling dust containing toxic metals which is generated by blasting, processing and transporting rock from the Copper World's operation.

In addition to this massive impact on human health, the computer models presented at the Aug. 14 ADEQ presentation showed the most likely path of airborne pollution will be to the northwest of the Copper World site, which will impact vegetation and the animals that graze that vegetation, on the Santa Rita Experimental Range. And, ADEQ staff stated that the computer model air pollution plume location was somewhat variable. Therefore, vegetation and wildlife in the US Forest Service lands to the south/southeast of the Copper World project will be negatively affected as well.

ADEQ is tasked with protecting the health of the community. It is incumbent upon ADEQ to require a Class I permit at a minimum, with testing and monitoring to be performed by an outside agency (not the permittee), and that additional restrictions be required in order to maintain our air quality.