

# JONATHAN SALVATIERRA

From: Jonathan Salvatierra

Date: Sunday September 15, 2024

Subject: Urgent Public Complaint Comments on Copper World "Bureaucratic, Epidemiologic, & Economic Genocidal Pollution Effects to Greater Tucson, & Southern Communities.

I seek clarification for concerned Greater Tucsonans, to identify sources to seek comprehensive educational discourse from ADEQ on recourse & redress from, perceived permitting content errors by ADEQ's highly educated State engineering team, that do not resonate to the full application of the team's talent, & truthfulness in creating parameters for the underlying structure of the conceptual modeling's failure to include "ALL" known fugitive, & misapplied non-fugitive causal links, to safeguard Public Health & Safety to those threatened surrounding communities impacted by these blatant omissions, & other serious causal link exclusions, without more adequate independent inspection, monitoring, timely reporting, or more aggressive timeliness guidelines to mitigate potential risk, or even the original propriety of any mining pursuit in the Santa Rita Mountain region, with its existing high population, endangered wildlife, continental migratory corridor, & environmentally sensitive location. I also fully concur with, and request the inclusion of that critique's subject matter review prepared by the Pima County Department of Environmental Quality, be placed into & made a part of my personal public comments, that Pima County Administrator Jan Leshner tendered to ADEQ's, "Copper World" project permitting, prepared by the Pima County Department of Environmental Quality. The concerned review of venue/jurisdiction conflicts, permitting (level 1 vs. level 2 issuance, due to more likely fugitive/non-fugitive emissions potential to grossly exceed & provoke EPA guideline limits), or outright refusal to permit by exclusion,(ie. excess production of sulfuric acid for sale to defer cost of copper production), as well as many shortcomings by omission, weakly enforceable commission, with more specific elements monitored, & more timely reporting of better comprehensive structural verbiage, or ignorance to address fugitive emission elements outside currently flawed conceptual modeling.

The consequence of our timely actions & challenges to the Copper World & South32 Hermosa llc mining incursions along the Santa Rita Mountain Range do not justify or condone the potential for permanently devastating Pima County & their adjoining communities & migratory wildlife with a threatened future fate by economic, bureaucratic, & epidemiologic genocide.

I also request that the personal comments I made before ADEQ & its representatives on the September 10th., 2024, "Corona de Tucson Public Comment Meeting", be made a part of my complete "personal comment discourse".

See: , under ADEQ Corona de Tucson Public comments by Jonathan P. Salvatierra.

\*\*\*\*\*The impactful narrative & insights rendered in this "Call to Public Action, & ADEQ Public Comment", are solely those of Jonathan P. Salvatierra, a native Tucsonan, retired U.P. Railroad local conductor, current active licensed Az. Real Estate Broker, birder, bee keeper, & ardent humanitarian community policy activist.

The following potential perceived breeches of Ethos, Integrity, Professionalism, Public Trust, & Mission Statement by ADEQ's certified & highly educated administration & staff must be evaluated as components of concern, prior to the eventual reliance on the permitting architecture submitted for approval & certification.:

1. Failure to honor tenants of Mission Statement against Public Trust.
2. Violation of A.R.S. 36-495.
3. Violation of A.R.S. 13-2702
  - A. A person commits perjury by making either:
    1. A false sworn statement in regard to a material issue, believing it to be false.
    2. A false unsworn declaration, certificate, verification or statement in regard to a material issue that the person subscribes as true under penalty of perjury, believing it to be false.
  - B. Perjury is a class 4 felony.
- 3 Violation of A.R.S. 13-2907.01  
Arizona Revised Statutes § 13-2907.01, makes it a Class 1 Misdemeanor to knowingly make a fraudulent or unfounded report or statement or to knowingly misrepresent a fact for the purpose of interfering with the orderly operation of a law enforcement agency or misleading a peace officer.
4. Pima County Department of Environmental Quality Concise Report of ADEQ's deficient permitting guidelines and other overt & covert important irregularities.

Arizona & its State agencies have a sworn obligation by law to educate the public of significant State approved enactments, laws, & major regulatory, legislative dictate, "prior" to their enforcement & adherence, compliance & simple understanding of their intent & procedural implementation, making an Official & Public demand compelling A.D.E.Q to immediately calendar two separate dates for "Q&A" Public Meeting, & a following separate "Public Comment Meeting", separately for both Copper World & South32 Hermosa llc., urgently, as four separate dates held locally here in Tucson, prior to "Any & All ", Executive/ Administrative Authorization, permitting, modification, or Expansion of preliminary provisional ongoing activities, as a fully effective Public Disclosure, outlining the implementation effects from current or pending lawsuits, but not limited to an explanation of the execution of a, "Cease & Desist Order".

No amount of future reparations or remediation can remedy the permanent losses to Greater Tucson's Health, Welfare, Economic Viability, Quality of Life, Future Tourism, Major Convention booking, Kitt Peak Observatory use, film making, & current retirement haven benefits we enjoy. The San Pedro & Santa Cruz rivers/riparian surface waters will be permanently contaminated on an increasingly annual basis, by toxic airborne, soil vapor, & water intrusion.

While Foreign proxy, For-Profit Copper World & South32 Hermosa llc., are eagerly extolling strategic mineral & energy material needs to the public, Forest Service, State, & Federal agency officials, their goal is to fully extract the underlying precious metals deposits onsite, by partial smelting, with minimally protected tailing pond's deposits, as a permanent toxic gift to their respective resident communities, as well as the rapacious devastation of existing perched & regional aquifer watershed recharge, from fugitive airborne contamination.

As a clarification & point of fact, our precious & unpolluted surface water & aquifer watershed

resources are our most essential life & ecosystem sustaining resource,

Our water is the true future clean energy substitute, far outweighing any "Strategic Mineral Initiative's" impetus advanced by the federal government, but lobbied by foreign for-profit multinational's proxies for their covert precious metals extraction, under the guise of national defense security.

Copper World, & South 32 Hermosa llc., are indifferent & in denial of prior & superior Arizona water covenants to subdivision approval guidelines, conferred to existing counties, communities, & city subdivisions. Their precedence in law disregards prior State granting authority to new & existing subdivisions for, "100 year assurance of potable drinking groundwater, recharged from clean surface water".

The arcane mining laws cited to allow unlimited groundwater access over existing lawful & superior previously granted 100 year water assurance certification Arizona Subdivision Application to cities, subdivisions, & communities, have no relevant applicable superiority of intent to the quantity & magnitude of current mechanized surface & underground mining, smelting, & toxic unresolved tailings operations, which leaves the public as the, "Holder of Last Recourse", under a future bankruptcy, or a Federal Register designation entry to a Foreign entity as the new sole owner of record, legally relinquishing the previous corporate ownership of any & all future remediation or liability consequence exposure.

Egregious exclusion of flagrant fugitive/non-fugitive causal links in ADEQ's conceptual modeling, National Weather Service's numerous verified local tornadic climate change weather pattern intensity, acceptance of applicant proffered bias hydrology models, along with ADEQ pre-approved "new" excess emissions containment failure limits, without regulatory recourse, & self compliance reporting, are several of many more naked fallacies that intentionally undermine A.D.E.Q, et al Federal, State, Forest Service, acquiescence under a dubiously executed, "Color of Authority". Their misleading legal cites & interpretations, compel & profess "Plausible Deniability". in disregard to their collective Mission Statements to serve & protect the public welfare, health, Federal, State, & Tribal, lands, air, & water, for future undiminished posterity of our atmospheric, surface, & aquifer's natural watershed formation's functional integrity. In its most harmful misguided application, it is tantamount to a "gifting or unlawful conversion of our national public resource assets, under the "Color of Authority", misapplied against the Public Trust!

When the given "Intent or Spirit" of any "Word of Law" is maligned in the conceptual or actual application of its use upon a sector of our society, their Quality of Life, Cultural Mores, Native Ecosystem & Wildlife Habitat symbiosis, either as an intentional or unintentional consequence, so that the permanent future welfare, health, vitality, integrity, natural co-existing symbiotic geologic harmony forever abridges public, cultural, & property values, this unlawful grievance is defined as "Bureaucratic, Epidemiologic, & Economic Genocide"!

Future proceedings by QDEQ locally demand that equal Greater Tucson's Full Disclosure by A.D.E.Q, et al, to compel A.D.E.Q to immediately calendar four separate total dates for "Live Q&A" Public Meeting, & a following separate "Live streaming Public Comment Meeting", separately for both Copper World & South32 Hermosa llc. Prior to "ANY", current & future reviews & permitting changes, activities, or expansion efforts, ("WITHOUT FUTURE TUCSON PUBLIC RECOURSE"). Committing to four separate dates held locally here in Tucson, prior to

"Any & All ", Executive/ Administrative Authorization, Permitting, modification, or expansion of preliminary provisional ongoing activities. These Tucson area "Q& A Public Meetings", & each following "Public Comment Meeting" must be Public & virtual, with fully televised & Live Stream video access availability, for easy immediate future free public download. These A.D.E.Q. calendar dates must incorporate any/all related pending lawsuits & prior decision relevance by A.D.E.Q legal staff citing each authority in each meeting, & produce each exact citation with full & complete electronic copies of all unredacted subject matter, readily available for immediate public access distribution. Time allotment for these Live Q&A, & Live Public Comment Meetings must not be constrained or marginalized in format, scope, or time duration.

The mandatory & prescribed public alert education affords Full Public Disclosure of Current or Pending lawsuits status, & historic legal precedence as relevant discussion topics at A.D.E.Q's "Live Q&A" Public meetings, on potential inspection procedures, effecting, but not limited to, format of, "Cease & Desist Order" guidelines, air/water/soil vapor extraction/airborne toxic exposure sampling/monitoring sites, & requests for monitoring inclusion at public venues, schools, residential areas, municipal buildings, metro centers, & public parks, on demand.

A.D.E.Q is reviewing a new permit filing by South32 Hermosa llc., for approval, even before a current lawsuit is in the process of a decision on content application procedural commission/commission inaccuracies, & errors. Our Greater Tucsonan comments will demand that A.D.E.Q provide the same local "Live Streamed Q&A Public Meeting", & a separate dated, "Live, Local, Streamed Public Comment Meeting" for public edification & educational presentation, with Full Disclosure for the same relevant hazardous concerns that Patagonia & Corona de Tucson received, are equally important to its potentially harmful & serious public medical health, welfare, & permanently devaluing economic impact & implications for Metro Tucson's one million residents.

Respectfully Submitted,

Jonathan Paul Salvatierra