

Kathryn Dorn

Dear Bernice Manuelito,

Thank you for opening a comment period on Hudbay Minerals' application for the Copper World Project; however, given the lack of rigor within Hudbay Minerals' proposal and the danger posed by allowing the company to monitor its own adherence (or lack thereof) to its proposed mitigation measures, I hope that you'll reject the permit application (either permanently or, at the very least, until Hudbay Minerals substantially improves its plan to safeguard nearby communities and ecosystems). The people of Tucson and Sahuarita, not to mention the fragile ecosystems of the Santa Rita mountains, cannot afford the potential water and soil contamination risks which Hudbay Minerals' current proposal entails (e.g., the risks posed by its plan to pour tailings through a company-monitored slurry pipeline into a unlined holding facility; its plan to use dangerous quantities of acid in close proximity to people's drinking-water supplies; and its plan to simply abandon the unwanted rock debris in uncovered dumps once the mining is done, which may be all sorts of fun for relatively lazy rockhounds to dig through but which pose potential health threats to everyone living and working nearby). At the absolute least, please require the following improvements to Hudbay Minerals' plan:

- The plan must include every permit requirement, condition, and agency review which Pima County staff recommended to your agency via their technical comment on March 11, 2024.
- Hudbay Minerals cannot be left to largely monitor its own compliance with vital environmental-protection laws, and you cannot safely allow this operation to go forward with only biennial monitoring; the ADEQ should instead conduct biannual monitoring of every parameter listed in Table 20 of the APP.
- To further ensure that waste materials do not leach into people's water supplies unnoticed, please require Hudbay Minerals to store tailings within a lined and dry-stacked facility, *not* an unlined dump; to employ every applicable industry-standard-or-better measure to minimize pollution; and install and maintain at least two additional point-of-compliance wells to monitor water quality within the aquifer adjacent to the planned east pit.
- Please mandate that Hudbay Minerals actually includes the whole planned east pit, along with the headwaters of all streams (including relatively small ones) near the Broadtop Butte and Copper World pits, within the Pollutant Management Area for Copper World's Phase 1.
- Define (and enforce) a rigorous minimum rate at which Hudbay Minerals must conduct waste-rock acid content analysis during all operations, not simply during the first year of its planned project.

Thank you for your time and consideration.

Sincerely, Kathryn Dorn AZ 85284-2837