

# Paul Westermann

Dear Bernice Manuelito,

Thank you for the chance to submit comments on the Copper World project's draft aquifer-protection permit. I'm concerned that the proposed design in Hudbay Minerals' application is significantly less protective of both the health of Indigenous Arizonans and that of the Arizona public at large than the designs submitted by previous owners of the Rosemont Mine. Furthermore, I fear the local habitat and groundwater supply will be severely and negatively impacted by this newly-proposed design.

Hudbay Minerals' application proposes to use water to convey tailings in a slurry pipeline, operate an unlined tailings facility, leave waste-rock dumps uncovered at closure, and deploy inadequate monitoring systems. The planned processing facilities, including a heap leach for processing significant amounts of acid, will be much closer to Tucson and Sahuarita's municipal water supplies and rural domestic wells than previously suggested.

The current draft permit proposed by the Arizona Department of Environmental Quality is dangerously indulgent of the polluter, which places the safety of Arizona locals and the environment at risk. As someone with friends heralding from Native lands, I am appalled by such actions. So I implore the Arizona Department of Environmental Quality to protect the state's water and public health by enforcing the following stringent standards in the aquifer-protection permit:

1. Hudbay Minerals must complete an economic and practical evaluation of tailings-storage facilities alternatives, including a lined and dry-stacked facility, among other potential redesigns.
2. Hudbay Minerals must include the entire east pit and the headwaters of small streams near the Broadtop Butte and Copper World pits in the Pollutant Management Area for Copper World's Phase 1, which will provide the best chance of detecting contaminants.
3. Hudbay Minerals must establish two additional point-of-compliance wells to ensure that the east-side aquifer isn't impaired by operations at the east pit.
4. The Arizona Department of Environmental Quality must define a minimum frequency of waste-rock acid content analysis for continued operations following the first year.
5. Hudbay Minerals must submit to biannual rather than biennial monitoring of the expanded list of parameters listed in Table 20 in the APP — which will aid in detection of pollutants that may otherwise go undetected for too long and delay an investigation into the pollution and the implementation of a remedy.

Finally, I request better deployment of industry-standard technologies by Hudbay Minerals for minimizing pollution, and I ask that the Arizona Department of Environmental Quality require the additional permit conditions, requirements and agency reviews detailed in the technical comments submitted by Pima County staff to your agency on March 11, 2024.

Sincerely, Paul Westermann AZ 85281-6612