

Emilio Falco

Dear Bernice Manuelito,

The plan design proposed in Hudbay Minerals' application is dangerous and much less protective of Arizona's public health, environment and groundwater than the designs submitted by the previous owners of the Rosemont Mine, which were also deficient but at a smaller scale.

Hudbay Minerals' application wants 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 ADEQ appears to be dangerously indulgent of the polluter at the expense of people and the environment. That's unacceptable. ADEQ must protect the state's water and public health by including the following strict requirements 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 designs.
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. ADEQ 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 utilization of industry-standard technologies by Hudbay Minerals to minimize pollution. I ask that ADEQ 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, Emilio Falco AZ 85646-0103