



# SAVE THE SCENIC SANTA RITAS ASSOCIATION

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July 5, 2017

Misael Cabrera, PE, Director

Arizona Department of Environmental Quality

1110 W. Washington, Suite 127

Phoenix, AZ 85007

RE: Triennial Review of State Water Quality Standards – especially regarding Davidson Canyon

Dear Mr. Cabrera,

As I'm sure you are aware, Save the Scenic Santa Ritas Association is a non-profit organization that is leading the opposition to the proposed Rosemont open-pit copper mine on the eastern slopes of the Santa Rita Mountains in southeastern Arizona. Because of our long-term involvement in this issue we have made a point to understand the hydrology and importance of Cienega Creek and Davidson Canyon, streams that originate on the east side of the Santa Ritas (Davidson Canyon being a tributary of Cienega Creek) and flow north into Pantano Creek, Tanque Verde Creek and, ultimately, the Tucson Basin.

Both waterways are rare, perennial, low-elevation desert streams. As such they provide habitat for a wide variety of rare and endangered flora and fauna. Because of their rarity and importance in the region, both streams were named as "Outstanding Waters" by the Arizona Department of Environmental Quality (ADEQ). This designation, the highest level of water quality protection within the state of Arizona, was given to protect the streams against future water quality degradation. Of additional importance, the surface and subsurface flow from this watershed provide approximately 20 percent of the drinking water for metropolitan Tucson, with a population of about one million residents.

A Triennial Review of State of Arizona water quality standards, which is currently underway, was apparently at least in part initiated by Hudbay, the mining company that is attempting to obtain permits for the Rosemont mine. Hudbay's interest in removing or revising the "Outstanding Water" designations (especially for Davidson Canyon) is clear: without these standards it would be easier to obtain the permits that are necessary to open the Rosemont Mine, and perhaps to obtain permits for other mining operations throughout the state of Arizona. (Supporting documentation to



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these statements can be found as attachments to a letter dated 29 June 2017 and sent to you from C. H. Huckelberry, County Administrator for Pima County.)

As you know, there are only 22 Outstanding Waters in the state of Arizona. In this state, free-flowing streams are rare and precious. They support life of all kinds in addition to providing aesthetic qualities that are welcome and important to the human inhabitants of a largely arid state.

In conclusion, I paraphrase and concur with the letter from Pima County mentioned above. It notes that water quality standards are present for a good reason: to protect Arizona residents as well as the environment and ecosystem. **The notion of dispensing with Outstanding Water designations so that hardrock mining, with all its negative impacts, can be made easier is outrageous.**

You are the director of a department that is aptly named: The Arizona Department of Environmental Quality. Please remember, as you make decisions regarding the natural resources of our state that Environmental Quality is of pre-eminent importance. Your job is to monitor, maintain, and in some cases enhance environmental protection. Davidson Canyon and the other 21 Outstanding Waters should remain as protected streams. If any changes are to be made, those changes should strengthen the protections that this designation provides, not reduce them.

Sincerely,

Gayle Hartmann, President  
Save the Scenic Santa Ritas