



SAVE THE SCENIC SANTA RITAS ASSOCIATION

8987 E. Tanque Verde #309-157, Tucson, AZ 85749 info@scenicsantaritas.org www.scenicsantaritas.org (520) 246-3622

September 20, 2023

Ms. Robyn Sahid, Commissioner
Arizona State Land Department
1110 W. Washington St.
Phoenix, AZ 85007

Via Email: Rsahid@AZLand.gov

RE: Withdrawing Land Sale Applications 53-122457 and 53-124338

Dear Commissioner Sahid,

I would like to bring to your attention recent statements made by Toronto-based Hudbay Minerals Inc. in a technical report required by Canadian regulators called a [Pre-Feasibility Study](#) for its proposed Copper World Mine Complex immediately east of the Santa Rita Experimental Range. The report makes significant changes to the mining plan that impact the two state Trust Land parcels referenced above.

Hudbay stated in its initial application to purchase the state Trust Lands that it intended to use the two noncontiguous parcels (160 acres and 40 acres) to dump mine tailings. (See Appendix A for a map that shows the location of the state Trust Land parcels in relation to the Copper World Mine Complex.)

However, Hudbay NOW states in the Pre-Feasibility Study that it has sufficient land to store mine tailings for the 20-year life of the mining project **without** the use of the state Trust Land.

The technical report includes a map after mining is complete that shows the location of mine tailings identified as TSF-1, TSF-2, and TSF-N that does not include the state Trust Land. (See Appendix B.)

The company also states in the report that it has sufficient space to dump mine tailings for the 20-year length of the current mining plan.

2, *“The Project includes the construction of three Tailings Storage Facilities: TSF-1, TSF-2, and TSF-N. A conventional tailings deposition is planned with a total capacity of 440 million tons, sufficient to accommodate a nominal rate of 60,000 tons per day through the mill for a period of 20 years.”* (See: Pre-Feasibility Study Page 1-14)

The 40-acre parcel is a sensitive environmental area that includes a riparian area known as Sycamore Canyon, which bisects the parcel. The land is also close to a residential area and an elementary school. This land should be set aside for conservation purposes.

The 160-acre parcel abuts the Coronado National Forest to the east and BLM land to the south and currently provides valuable open space to the public. If sold to Hudbay, this land will no longer be accessible whether Hudbay builds the mine or not.

In addition to the fact that these parcels are not needed for Hudbay to move ahead with its proposed mine, there is no pressing need to auction this land. Hudbay is years away from formally deciding whether to build Copper World, which is just one of several speculative mining projects the company is seeking to develop in Canada, the United States, and Peru.

In a [February 2023 press release](#), Hudbay stated, “the opportunity to sanction Copper World is not expected until 2025 based on current estimated timelines.” (Emphasis added.) The company reaffirmed the 2025 timeline in a September [Investor Presentation](#), stating that it is not “expected” that its board of directors will formally consider “sanctioning” construction of the Copper World Mining Complex until 2025. (See Page 20.)

Given the fact that Hudbay already has sufficient land to construct its proposed mine and dump its mine tailings without the use of Trust Land and the fact that Hudbay does not expect to formally decide on whether to build the mine until at least 2025, there is no need at this time for the state Land Department to schedule these two parcels for auction.

We respectfully request that you do not auction the Trust Land parcels because they are not necessary for Hudbay to execute its mining plan, and it’s premature for the state to auction off Trust Land to a foreign-based company for speculative purposes.

Thank you for your consideration.

Sincerely,



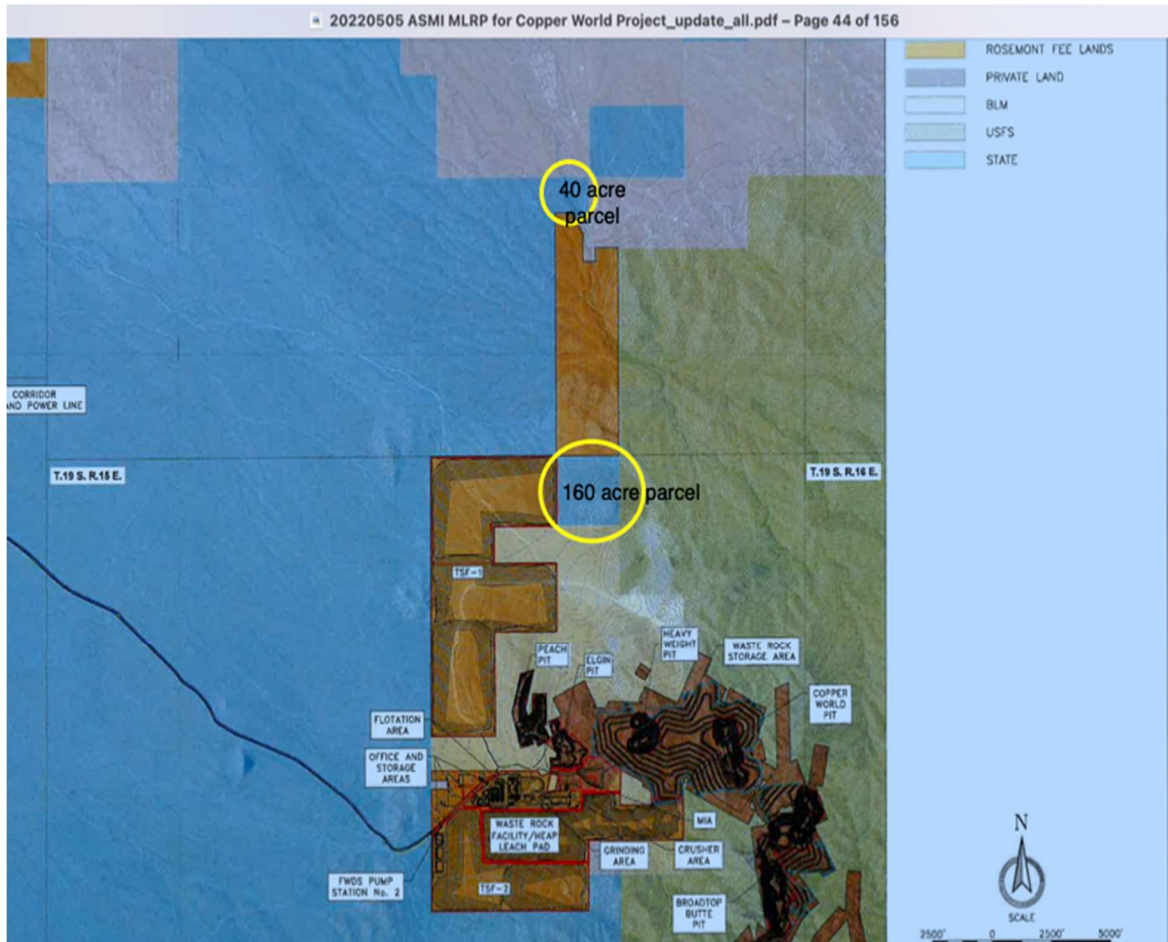
Tom Nelson, President
Save the Scenic Santa Ritas



Rob Peters, Executive Director
Save the Scenic Santa Ritas

Cc: Chad Campbell ccampbell@az.gov
Will Greene wgreene@az.gov
Maren Mahoney <mmahoney@az.gov>

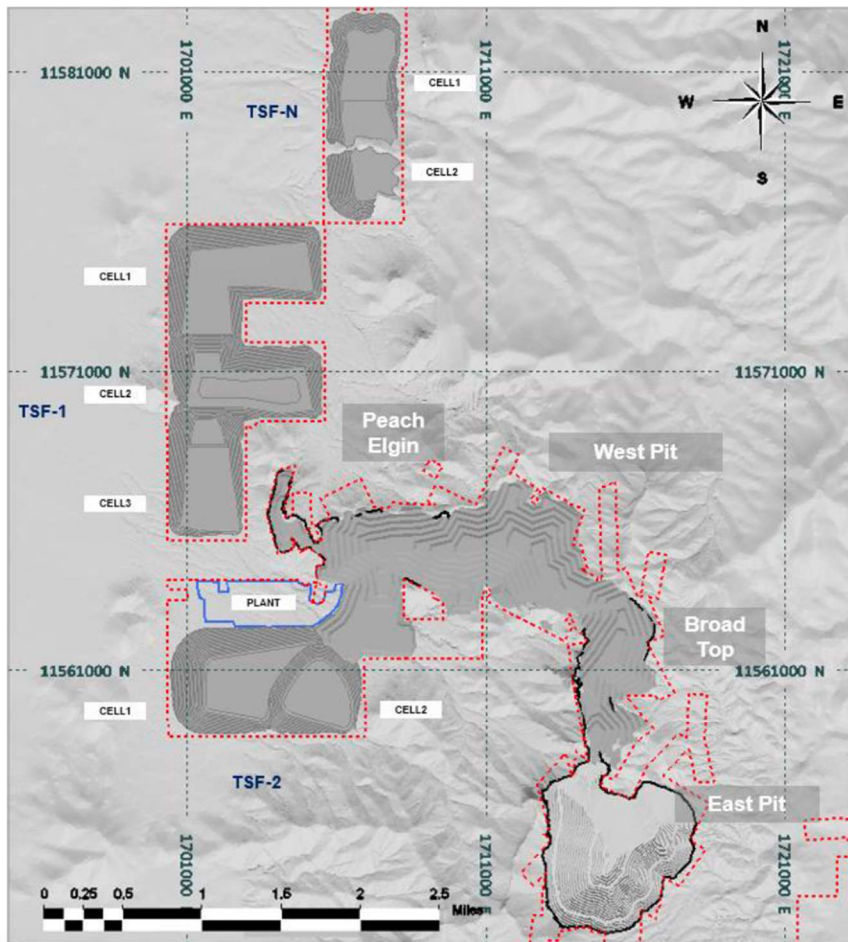
Appendix A



The state Land Trust parcels are within the yellow circles. The brown-shaded areas include Hubday's mining operations and the three tailings storage facilities designated as "TSF." TSF-2 is in the lower left, TSF-1 is the "F" shaped parcel, and TSF-N is the narrow strip that touches the northeast corner of TSF-1. The Santa Rita Experiment Range is in blue immediately west of the three Tailings Storage facilities. The Coronado National Forest is shaded in green. U.S. Bureau of Land Management property is shaded in gray and separates TSF 1 and TSF 2.

Appendix B

FIGURE 16-19: MINE PLAN FINAL CONFIGURATION AT END OF MINE LIFE



Mining complete in all pits.

The above map is included in Hudbay's Pre-Feasibility Study and shows the final deposition of tailings in 20 years at the conclusion of mining. The two state land parcels are not included.

Save the Scenic Santa Ritas (SSSR) is a non profit organization founded in 1996 to protect our area from environmental degradation caused by mining and mineral exploration activities.

Save the Scenic Santa Ritas (SSSR) is a non profit organization founded in 1996 to protect our area from environmental degradation caused by mining and mineral exploration activities.