



Oct. 28, 2025

Gov. Katie Hobbs
Office of the Governor
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RE: Opposition to ASLD Application #53-122457 for the sale of 160 acres of State Trust Land requested by Copper World, Inc.

Dear Governor Hobbs:

We respectfully request that you direct Land Commissioner Robyn Sahid to cancel plans to auction 160 acres on the western flank of the Santa Rita Mountains requested by Toronto-based Hudbay Minerals' Copper World subsidiary.

The sale of this land to Copper World will facilitate the development of a series of open-pit mines that will destroy the northern half of the Santa Rita Mountains, consume enormous amounts of groundwater, devalue State Trust Land, and have devastating impacts on nearby communities and natural and cultural resources.

Copper World intends to pump about [8.4 million gallons of water a day](#) from well fields immediately east of the Santa Cruz River near Sahuarita and within the Tucson Active Management Area. The company projects the mine will operate for more than 40 years. The groundwater table in the area is already dropping [more than 3 feet a year](#), causing land [subsidence](#).

Copper World has no realistic way to replenish the groundwater. Nearly all of its CAP purchases since 2007 have been [stored in the Lower Santa Cruz Recharge Project](#) in Marana and will have no impact on the groundwater table in Sahuarita and Green Valley. Copper World will increase the amount of groundwater pumping in the Community Water Company's service area, which serves Sahuarita and Green Valley, by [more than 300%](#). The water company [increased rates in August by 24%](#).

Pima County, the City of Tucson and the Tohono O'odham Nation are opposed to Copper World. The Pima County Board of Supervisors, on October 21, reaffirmed its longstanding opposition to Copper World when it [passed its fourth Resolution](#) opposing this project since 2007, specifically citing its opposition to the sale of the 160 acres and the mine's groundwater pumping.

The Tucson City Council has [strongly opposed](#) Copper World's effort to store Central Arizona Project water at the Pima Mine Road Recharge Project. The Tohono O'odham Nation has long opposed open-pit mining in the Santa Rita Mountains and [requested](#) the State Land Department (SLD) not to auction the 160 acres.

The SLD has a Constitutional responsibility to protect the value of State Trust Lands. The value of State Trust Land is directly related to the amount of groundwater beneath. The SLD has not determined the impact of Copper World's groundwater pumping on the value of nearby State Trust Land.

We strongly encourage you to direct the SLD to conduct the same comprehensive groundwater study for Copper World that was done for the Resolution Copper Mine's impact on the Superstition Vistas Planning Area. In 2019, the [SLD determined](#) Resolution's groundwater pumping would reduce the value of 3,440 acres of State Trust Land in Superstition Vistas by more than \$530 million.

The SLD reiterated the damage Resolution will inflict on State Trust Lands earlier this year when it objected to a proposed federal land exchange needed to construct the mine. In an [August 4 letter](#) to the U.S. Forest Service, Commissioner Sahid stated Resolution's "groundwater withdrawals will have significant adverse impacts on the regional aquifer underlying 275 square miles of STL." (Emphasis added.)

The SLD's 52,000-acre Santa Rita Experimental Range (SRER) is immediately east of Copper World's groundwater well fields. The SRER is [mandated by state law](#) to be operated for "ecological and rangeland research." Depleting groundwater beneath the SRER will damage its mission and devalue the property.

We strongly urge the State to conduct an economic analysis on the impact of Copper World's groundwater withdrawals on potentially impacted State Trust Lands, including the SRER, before it decides whether to offer the 160-acre parcel for sale. This study should be made available to the public before any decision on whether to proceed with a sale.

Until these actions are completed, we respectfully request that you direct Commissioner Sahid to withdraw this land from auction.

Respectfully,

John Dougherty

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Save the Scenic Santa Ritas

Louise Misztal

Executive Director
Sky Island Alliance

Sandy Bahr

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President of the Board of Directors, with
unanimous support from members of the
Board of Directors
Friends of Madera Canyon