

Kimberly MacMillan

From: **Brian Turner** <Brian_Turner@nthp.org>

Date: Wed, May 4, 2011 at 2:00 PM

Subject: No. Arizona Proposed Withdrawal DEIS Comments

To: "azasminerals@blm.gov" <azasminerals@blm.gov>

Cc: "robin_burgess@blm.gov" <robin_burgess@blm.gov>, "jwg2@azstateparks.gov" <jwg2@azstateparks.gov>

Greetings,

Please find enclosed

- Comments from the Cultural Resources Preservation Coalition (CRPC) on the Northern Arizona Proposed Withdrawal Draft EIS; and
- Comment letter from the National Trust for Historic Preservation endorsing the CRPC comments.

Thank you for your consideration.

Brian R. Turner | Regional Attorney, Western Office

National Trust for Historic Preservation | 5 Third Street, Suite 707, San Francisco, CA 94103 | Phone: 415.947.0692 ext. 38225 |

Email: brian_turner@nthp.org | www.PreservationNation.org

The National Trust for Historic Preservation helps people protect, enhance, and enjoy the places that matter to them. Become our newest member today! Learn more at www.PreservationNation.org

Cultural Resources Preservation Coalition
c/o Rebecca Schwendler
National Trust for Historic Preservation
535 16th Street, Suite 750
Denver, CO 80026

May 4, 2011

VIA EMAIL to azasminerals@blm.gov

Scott Florence
District Manager
Bureau of Land Management
Arizona Strip District Office
345 East Riverside Drive,
St. George, UT 84790-6714

**Re: Comments on the Northern Arizona Proposed Withdrawal Draft
Environmental Impact Statement (Ref: AZA-35138)**

Dear Mr. Florence:

Thank you for the opportunity to comment on the proposed 20-year withdrawal of nearly one million acres of public lands near the Grand Canyon from mineral exploration. We strongly support Alternative B, BLM's preferred alternative, which would result in the protection of cultural landscapes, watersheds, and the archaeological record on three parcels surrounding one of America's most cherished landscapes. A prolonged extension of the Administration's two-year halt on new mining claims in the region is sorely necessary to protect the Grand Canyon from the severe and lasting damage that could result from any further hard rock mining and exploration.

In the more than 83,000 comments received during the scoping period for this project, BLM identified the protection of cultural and American Indian resources as a key issue. The project area contains Traditional Cultural Properties (TCPs), sacred and traditional sites, as well as historic and archaeological resources, all of which are vulnerable to damage caused by additional mining. A recent Class I inventory of known cultural resources identified 461 sites as eligible for the National Register of Historic Places and nearly two-thousand additional sites have yet to be fully evaluated. Further, more detailed surveys of these landscapes is likely to reveal hundreds if not thousands more such sites given the extensive record of human history in the region.

Interests of the Cultural Resources Preservation Coalition

Each of the organizations signing this letter is a member of the Cultural Resources Preservation Coalition (the Coalition). The Coalition is a group of historic preservation, tribal, archaeology, trails, recreation, business, and place based organizations, led by the National Trust for Historic Preservation. The Coalition

advocates for the protection of irreplaceable cultural resources located primarily on federal public lands managed by the Bureau of Land Management (BLM), the United States Forest Service (USFS) and the National Park Service (NPS). As a coalition we promote the preservation, protection and interpretation of prehistoric, historic and traditional cultural resources on federal public lands by advocating for increased cultural resources funding, staffing, inventorying, planning, compliance, law enforcement, awareness and education.

Spiritual Significance of the Grand Canyon Lands to Native Peoples

The Grand Canyon has been spiritually significant to numerous Native American tribes including those of the Southern Paiute, Havasupai, Hualapai, Navajo, Hopi, and Pueblo of Zuni. Many of these groups see their history and culture as being “bound and expressed in the landscape.” (DEIS 3-206). The Grand Canyon and its surrounding landscape retain exceptional significance because of its relationship to their origin stories and worldviews. For instance, the Havasupai, in their objection to the Forest Service’s approval of the Canyon Uranium Mine, which is in the area now proposed for withdrawal, asserted that “*any* mining will interfere with their religious practices at and near the mine, will kill their deities and destroy their religion or ‘Way.’” *The Havasupai Tribe, et al. v. United States*, 752 F. Supp. 1471, 1484 (D. Ariz. 1990)(emphasis added). Though the Canyon Mine project moved forward despite the Havasupai’s concerns, the proposed action would cause a cessation of future claims for hard rock mining in the area. Because these lands are uniquely sensitive, we applaud BLM for acting to protect them from further damage.

Mining and exploratory activity Will Cause Irreversible Damage to the Grand Canyon

The 150-year history of hardrock mining in the area surrounding the Grand Canyon has already caused lasting impacts to its land and watershed. Ongoing mining exploration, construction, road construction and use, mine operation, reclamation, and contamination are important baseline factors to consider in planning to manage future development. In our experience, the construction of graded roads and increased vehicular activity associated with mining has caused an increase in vandalism at highly visible structures and archaeological sites. And even though avoidance of sites must be considered as an alternative in any review process for permitting individual mining projects, the full protection of these resources is not mandated by the federal environmental and historic preservation laws.

The Draft EIS outlines several particular sites that would be vulnerable to damage if hardrock mining were permitted in the project area. While not yet formally evaluated for its significance, the Kanab Creek Ecoscape on the North Parcel contains an ancient traderoute and is considered an integral part of the Grand Canyon TCP by the Southern Paiute Consortium. (Draft EIS at 3-210). Three mines

are already proposed within this Ecoscape and, presumably, more resource exploitation would occur in the event these lands were opened for future claims.

In addition, Red Butte in the South Parcel, which is currently undergoing an evaluation by the Forest Service regarding its eligibility for the National Register as a TCP, could be severely impacted by additional mining given the presence of uranium in its vicinity. As stated in the Draft EIS, "Red Butte is an important ceremonial site for several tribes and is particularly sensitive to ground, visual, and noise disturbances." (Draft EIS at 4-211).

Further, additional mining in the proposed area would cause cumulative impacts on cultural resources. Past projects in the area include the Grand Canyon National Park Airport Fuels Reduction Project, the Arizona Strip ROD/RMP, the Designation of Energy Corridors on Federal Land in the 11 Western States EIS, the Orphan Mine, the Arizona 1 Mine, the EZ1 and EZ2 Mines, the What Mine, the VANE Minerals Uranium Exploratory Drilling Project EIS, the Four Forest Restoration Initiative, the Kaibab National Forest Travel Management EAs, and the Plateau Facility Fire Protection Project EA. Hard rock mining puts added pressures on these fragile public lands which have recently endured these numerous interventions. The proposed withdrawal is reasonable in light of the additional demands posed by hard rock mining.

Conclusion

With most of our public lands in the West open to claims under the nation's antiquated 19th century mining law, some places – such as the land surrounding the Grand Canyon – must be kept off-limits. Nearly five million people will visit the Grand Canyon this year, heeding the advice of President Theodore Roosevelt to enjoy one of "the great sights, which every American...should see." It would be a shame to permit additional development that has the potential to cause irreparable harm to this culturally significant and well-loved place. We urge you to protect the Grand Canyon by withdrawing all one million acres of public land around it from future mining claims.

Sincerely,

Anthea Hartig
Western Regional Director
National Trust for Historic Preservation

Carrie Gregory
Vice-President
Alliance for Historic Landscape Preservation

Scott Florence
May 4, 2011
Page 4 of 4

Damon Dozier
Director of Public Affairs
American Anthropological Association

Linea Sundstrom, Chair
Conservation Committee
American Rock Art Research Association

Deborah J. Gangloff, Ph.D.
President & CEO
Crow Canyon Archaeological Center

Michael J. Painter
Coordinator
Californians for Western Wilderness

Christina McVie
Board Secretary
Friends of Ironwood Forest

Thomas Hulen
Executive Director
Friends of the Sonoran Desert National Monument

Greg Seymour
Board
Nevada Archaeological Association

Douglas D. Dykeman
President
New Mexico Archaeological Council

Leonard Becker
President & Co-Founder
Sacred Sites International Foundation

cc: Dr. Robin Burgess, BLM FPO
Mr. James W. Garrison, Arizona State Historic Preservation Office

May 4, 2011

VIA EMAIL to azasminerals@blm.gov

Scott Florence
District Manager
Bureau of Land Management
Arizona Strip District Office
345 East Riverside Drive,
St. George, UT 84790-6714

Re: Endorsement of Cultural Resources Preservation Coalition Letter on the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement (Ref: AZA-35138)

Dear Mr. Florence

The National Trust for Historic Preservation endorses the comments submitted by the Cultural Resources Preservation Coalition on the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement.

Interests of the National Trust for Historic Preservation

The National Trust is a private, non-profit corporation chartered by Congress in 1949 to protect America's historic resources, to further the historic preservation policy of the United States and to facilitate public participation in the preservation of our nation's heritage. 16 U.S.C. §§ 461, 468. With the support of nearly 200,000 members nationwide, including over 1,700 in Arizona, the National Trust works to bring people together to protect, enhance and enjoy the places that matter to them.

Respectfully submitted,



Anthea M. Hartig, Ph.D
Regional Director, Western Office

Encl.: Grand Canyon Comment Letter