

Kimberly MacMillan

From: **Mary Crowe Costello** <maryrca@rockcreekalliance.org>

Date: Tue, May 3, 2011 at 12:06 AM

Subject: Northern Arizona Withdrawal Comments

To: NAZproposedwithdrawal@azblm.org

May 3, 2011

To: BUREAU OF LAND MANAGEMENT
Arizona Strip District Office
345 East Riverside Drive
St. George, UT 84790--6714

Re: Northern Arizona Proposed Withdrawal DEIS

Please accept the following comments on the proposed withdrawal of the approximately 1 million lands in northern Arizona near the Grand Canyon from mineral claims.

No where is it more evident that the 1872 Mining Law must be reformed to protect special places from the impacts of hard-rock mining, including uranium mining, than in the vicinity of one of our nation's most stunning national parks. In spite of efforts to introduce meaningful and comprehensive legislation by Rep. Nick Rahall and Senator Jeff Bingaman, the ability of certain western senators to derail mining reform continues to frustrate the American public's desire to protect areas of unique ecological, geological, cultural, and historical significance from hard-rock mining.

I fully support the proposed withdrawal under Alternative B, and would like to see the withdrawal become permanent. As a member of the general public, I do not have the expertise to review and comment on the DEIS in the detail it warrants. Thus, my comments are more general in nature. My comments and questions mostly address impacts to the park, surrounding public lands, and local communities if Alternative B is **not** chosen. It is my hope that the Secretary of the Interior will choose to protect this area for all Americans by withdrawing the entire 1 million acres.

Cumulative Impacts:

I am concerned about the cumulative environmental impacts of the uranium mining that would occur without a withdrawal, estimated to be 30 mines. In examining the DEIS, it appears that a thorough job of identifying environmental impacts was done. However, estimating the cumulative damage of multiple mines would be problematic and under-estimated as the complexities of many ecological processes are unknown to us. How will the BLM address cumulative impacts if there is no withdrawal, or a limited withdrawal?

If proposed mines impact T&E species, and consultation is initiated with the US Fish and Wildlife Service, how will you ensure that the wildlife agency addresses cumulative impacts to a given species from multiple mines? The Service is not required to look at reasonably foreseeable events so could ignore mines that are planned, but not yet constructed. The agency also has been known to limit its analysis to a subpopulation that it renders as "expendable" in order to arrive at a non-jeopardy opinion for a particular proposed project while ignoring cumulative impacts across the range of a species.

Hydrology:

I am especially concerned about the impacts to ground and surface waters in this arid region. Mining consumes enormous amounts of ground water, placing already stressed aquifers at risk of being depleted. Mining has impacts to ground and surface waters that are often unpredicted and unregulated. Alteration of stream flows, and dewatering of seeps and springs essential to a desert ecosystem are of utmost concern. Contamination of surface and ground waters from mining is often of a perpetual nature. Would this be the case for the uranium mines that would ultimately be constructed without a withdrawal? What measures would be taken to ensure that ground and surface waters were not depleted for wildlife? What impact would multiple mines have on the hydrology of the park? How would underground aquifers that supply

drinking water for local communities be protected? How would communities outside of the mining areas that are dependent on the Colorado River be impacted?

Mining Contamination of Surface Waters and Hydrologically-Connected Ground Waters:

Would NPDES discharge permits be issued that allow increases in heavy metals in receiving waters? Would levels of allowable metals be protective of aquatic life? Would discharges of arsenic be allowed? Would selenium be released from mining operations? Would untreated discharges containing radium be allowed?

Waste Disposal:

How would radioactive waste, including tailings and waste rock, be handled and stored? Would there be contingency plans for dealing with unexpected, catastrophic events? Would radioactive waste be hauled from the mine sites? Would local emergency crews be equipped to deal with situations involving radioactive materials?

Bonding:

Would mining companies be required to post bonds? If so, would bonding be for long-term monitoring and reclamation? Would it cover water treatment in perpetuity? If not, who would pay for water treatment and clean-up costs? The cost of cleaning up mining contamination has historically been borne by taxpayers.

Fish and Wildlife:

How would local wildlife species, including small mammals, migratory ungulates, reptiles, amphibians, and songbirds that are dependent on seasonal and ephemeral streams and ponds be affected by dewatering? How would the life cycle of amphibians be impacted? How would local wildlife, including migrating waterfowl, be protected from contaminated water sources?

The greatest diversity of songbirds in this area is associated with riparian habitats. What impacts are projected to occur to these vital riparian zones that birds and other wildlife depend upon?

Are there sensitive species present in the area that would trend towards listing if these mines were built? What impact would multiple uranium mines have on T& E species; on critical habitat? How would migration corridors be impacted? How could the damage from multiple mines possibly be mitigated when mining would occur over such a large area?

How would increased truck traffic associated with these mines impact local wildlife, such as ungulates and raptors? I have property in southeastern Utah and have witnessed the amount of wildlife killed by uranium haulers in the corridor between Blanding and Moab, Utah. It is having a big impact on local ungulate populations.

How much poaching is anticipated to occur from an influx of mine workers? What impacts would the increased road density associated with mine development have on frequency of poaching, wildlife harassment, and wildlife fatalities from collisions with motor vehicles? How much would OHV use increase and what impact would it have on wildlife?

How would the spread of noxious weeds from mine development affect forage availability for local wildlife? What would be done to control the introduction of noxious weeds?

Air Quality:

How would the Class I airshed in the Park be protected from the cumulative air emissions from multiple mines? Doesn't the park already have trouble maintaining air quality? How would deterioration of air quality in airsheds outside the park be prevented?

Viewshed, Night Sky, and Soundscapes in the Park and Surrounding Public Lands:

I am concerned about impacts to the viewshed of the park and surrounding public lands from the construction of tailings impoundments, percolation ponds, and other mine-related changes to the landscape, as well as industrial buildings and associated roads. Would some of these changes in the landscape be long-term, if not permanent?

How would the night sky be impacted from industrial lighting? Would industrial lighting be visible in the park? Would the industrial lighting be 24/7?

How much noise would be generated? What would the intensity and duration be? Would noise from blasting and industrial processing be audible in the park?

Collection of Baseline Data:

Would adequate baseline data be collected to be able to demonstrate impacts to aquatic resources, fish, and wildlife? What type of data would be required? Would thorough geochemical testing of waste rock and ore be done?

Monitoring & Enforcement:

What type of monitoring would be conducted? Would the state of Arizona be relied upon to conduct monitoring and enforcement? How can public lands and resources be protected with the lax or nonexistent monitoring and enforcement that Arizona's DEQ has already demonstrated? What would happen if the Arizona legislature cuts funding for monitoring and enforcement?

Reclamation:

What type of reclamation would be required post-closure for these mines? Is reclamation even possible? Where would contaminated soil and waste rock be stored? Would native vegetation be re-established on reclaimed sites? Has successful reclamation to prior mining conditions been demonstrated post uranium mining? Would there be large expanses of public land posted as radioactive and inaccessible to the public? What health risks would be associated with abandoned mines?

Health Impacts:

Would mining companies cover the cost of medical care for sickened workers for their lifetime or would the costs be borne by taxpayers?

Climate Change:

Was an analysis conducted to determine the carbon footprint of multiple uranium mines? Would the production of uranium from these mines discourage the development and utilization of clean sources of energy production such as solar; of conservation of energy? I could not find an analysis in the DEIS.

Economic Impacts:

The economic analyses appear to be based on an over-simplistic model. It is stated on pg. 248 of 270: "overall regional tourist activity and associated employment are unlikely to be affected under Alternative A." If thirty new uranium mines are constructed, the damage caused by these mines likely will be noticeable to tourists and will affect the amount of repeat visits and new visits over time as the word gets out.

How would contamination of surface and ground water, and dewatering of underground aquifers affect long-term local and regional economies? If drinking water is contaminated, would the mining companies provide communities with an alternate source of drinking water? How would contamination impact agriculture?

The mere perception of pollution, especially radioactive pollution, will deter potential new residents and business upstarts from the area. It also will likely spur an emigration from the area. Was this accounted for in the economic model? Proposed uranium mining near Moab, UT has raised concerns among homeowners in the Bridger Jack Mesa subdivision. Some homeowners invested their life savings to purchase a home in this subdivision only to discover that a uranium mine is proposed near their subdivision. If the mine is permitted, it likely will lead to an exodus of homeowners and the spending capital they have brought to the area.

Mining leads to a boom and bust economy. Wouldn't this be the case with multiple mines drawing in workers from out of the area seeking employment? What is the predicted turnover rate of employees in this industry? How many immigrants to the area would be unable to find employment in the mines? What impact would that have on local economies? How many of the mine employees would actually be "locals?" How is "local" defined? Would the mining companies pay for the increased demands on local infrastructure from the influx of miners and their families? Would they fund social programs to deal with the problems often associated with mining such as domestic abuse and drinking? What would happen to local economies if the price of uranium falls dramatically and mines are forced to close? Wouldn't unemployment rates sky rocket? Isn't it likely that transforming such a large area into an economy so heavily dependent on mining would prevent economic diversification? How much "wealth" would uranium mining actually add over the long-term? Mining often leads to the loss of economic diversification over the long-term. Small cottage industries would be discouraged in favor of short-term mining-related industries.

There would still be 11 uranium mines under Alternative B—hardly a hardship on the industry. By limiting this development, which is still excessive, we can minimize the boom and bust scenario that mining inevitably brings. Mining jobs represent short-term economic growth, but dependence on them leads to long-term economic problems, pollution, and, in the case of uranium mining, rising human health costs that are difficult to measure and are absorbed by everyone in rising health care premiums.

The value of the park and proposed withdrawal area will become greater as the recreational demands of an expanding population increase; as water becomes an increasingly scarce commodity; and as refugia for wildlife become rare. Without the withdrawal, the potential of this area to meet the future needs of people and wildlife will be greatly diminished and some resources will be irretrievably lost.

Thank you for providing an opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Mary Crowe Costello".

Mary Crowe Costello
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