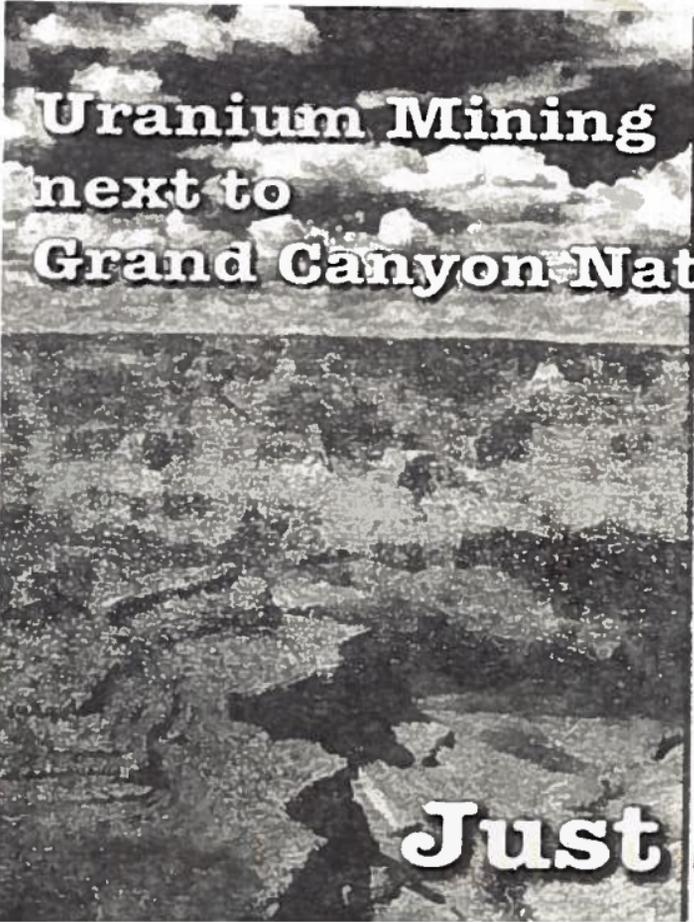


37



**Uranium Mining**

**next to**

**Grand Canyon National Park?**

**Just say No!**



USA FIRST CLASS FOREVER

I support protecting from mining the one million acres of public lands surrounding Grand Canyon National Park as identified in Alternative B of the Draft Environmental Impact Statement. I also support protecting these lands for 20 years, which is the maximum allowed administratively.

**BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE**

**APR 25 2011**



Printed on recycled paper.

**FROM:**  
(address must be included)



**Scott Mittelsteadt  
17215 N. 15th Dr  
Phoenix, AZ 85023**

**TO:**  
**Northern Arizona Proposed  
Withdrawal Project  
ATTN: Scott Florence, District Manager  
Bureau of Land Management,  
Arizona Strip District  
345 E. Riverside Drive  
St. George, UT 84790-6714**

BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE

APR 25 2011

AIRMAIL



Christine Pfau  
Theresienstr. 72  
80333 München  
Germany



**LUFTPOST**  
PAR AVION PRIORITAIRE

Secretary Ken Salazar  
U.S. Department of the Interior  
Bureau of Land Management  
Arizona Strip District  
345 East Riverside Drive  
St. George, UT 84790  
USA

[www.aktionsgruppe.de](http://www.aktionsgruppe.de)

8479096714 0012



Dear Secretary Salazar,

I support protecting the Grand Canyon's entire 1 million-acre watershed from uranium mining as outlined in Alternative B in the Draft Northern Arizona Proposed Withdrawal Environmental Impact Statement and Revisions to the Withdrawal Application, Arizona.

The Grand Canyon National Park is an international treasure. The diversity of habitats resulting from its great depth, its diverse topography, and its isolated seeps, springs and caves make it one of the most biologically diverse national parks in the United States.

The Grand Canyon is also the home of the Havasupai Nation. Indigenous Nations have been suffering from uranium mining for years. We can't sacrifice their lives. President Obama has signed the UN Declaration on the Rights of Indigenous Peoples in December 2011. Now, it is time to implement it.

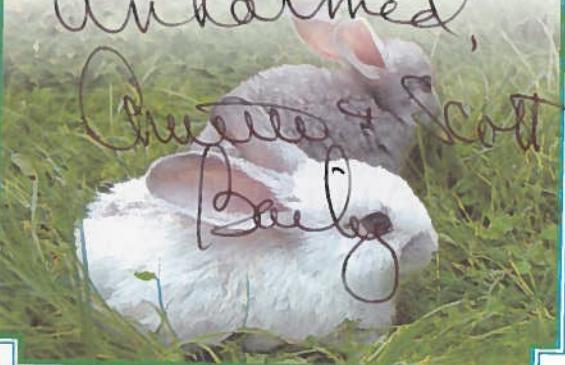
Yours

Ms. Annette Bailey

NOTES

Dear Sir or Madam,  
I'm writing  
to urge you  
strongly to protect  
the Grand  
Canyon from  
uranium mining  
which poisons the  
land. Leave  
Grand Canyon  
unharmd.

Annette & Scott  
Bailey



6473046714

APR 25 2011

345 E. Riverside Dr.  
ST. George, UT



BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE

Ken Salazar,  
U.S. Dept of Interior,  
Director of the  
Arizona Strip District



Ms. Annette Bailey  
753 James St Apt 304  
Syracuse NY 13203-2136  
Proud Supporter of DDAL

SYRACUSE NY 132



FRANK ABEL  
GOETESTR. 28  
55774 BAUMHOLZER GERMANY

**Secretary Ken Salazar**  
U.S. Department of the Interior  
Bureau of Land Management  
Arizona Strip District  
345 East Riverside Drive  
St. George, UT 84790  
USA

BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE

APR 25 2011

**No uranium mining at the Grand Canyon!**

Dear Secretary Salazar,

I support protecting the Grand Canyon's entire 1 million-acre watershed from uranium mining as outlined in Alternative B in the Draft Northern Arizona Proposed Withdrawal Environmental Impact Statement and Revisions to the Withdrawal Application, Arizona.

The Grand Canyon National Park is an international treasure. The diversity of habitats resulting from its great depth, its diverse topography, and its isolated seeps, springs and caves make it one of the most biologically diverse national parks in the United States.

The Grand Canyon is also the home of the Havasupai Nation. Indigenous Nations have been suffering from uranium mining for years. We can't sacrifice their lives. President Obama has signed the UN Declaration on the Rights of Indigenous Peoples in December 2011. Now, it is time to implement it.

Yours

FRANK  
ABEL



[www.aktionsgruppe.de](http://www.aktionsgruppe.de)

# TOWN OF TUSAYAN

at the entrance to Grand Canyon National Park

April 15, 2011

Honorable Ken Salazar  
Secretary of Interior  
United States of America  
Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE

APR 25 2011

Honorable Secretary Salazar;

The Town Council of Arizona's newest township, Tusayan, Arizona unanimously voted to send you the attached resolution in support of extending the segregation order limiting new mining claims on federal public lands adjacent to the Grand Canyon National Park in the Kanab Creek area and in the House Rock Valley managed by the Bureau of Land Management and in the Tusayan Ranger District of the Kaibab National Forest.

Tourism is the driving force of our region's economy. A 2005 study by Northern Arizona University found that visitation to the Grand Canyon provides \$687 million annually in direct and indirect revenues to the local economy and employs 12,000 FTEs. The Canyon averages nearly five million visitors annually making it the key economic engine which impacts Flagstaff, Sedona, Verde Valley and other communities.

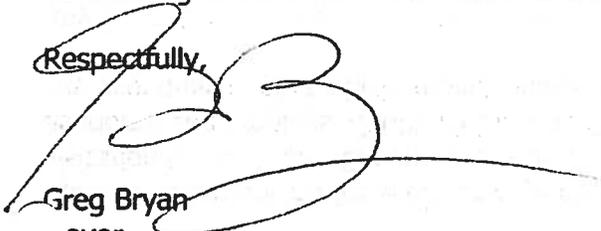
Any benefit from mining operations will be minimal to our communities since most of the operations are located on public lands. Uranium and other rock minerals mined on federal land do not pay royalties to U.S. taxpayers unlike oil, natural gas and coal industries. The majority of the mining companies that have filed new claims are foreign and so profits will leave Arizona and the United States.

We are also concerned with potential uranium contamination to affect tributaries that supply water to the Grand Canyon region and that flow into the Colorado River. The Little Colorado River, Kanab Creek and others have contamination postings due to excessive radionuclide contamination.

The transportation of extracted ore will have a negative impact on our roads and highways and increase the level of danger from possible nuclear hazard spillages. The temporary and permanent closing of our roads from accident can create devastating consequences on our economy and the well being of our residents.

We urge you to extend the existing temporary withdrawal affecting new mining on public lands surrounding the Grand Canyon for another twenty years. The socio-economic and health impact of not doing so could be devastating to the lives of our residents and to our local economies.

Respectfully,

  
Greg Bryan  
Mayor

RESOLUTION 2011-03-2302

A RESOLUTION OF THE TUSAYAN TOWN COUNCIL SUPPORTING AND URGING SECRETARY OF INTERIOR SALAZAR'S PROPOSAL TO WITHDRAW APPROXIMATELY ONE MILLION ACRES OF FEDERAL LANDS SURROUNDING GRAND CANYON NATIONAL PARK FOR URANIUM MINING FOR 20 YEARS.

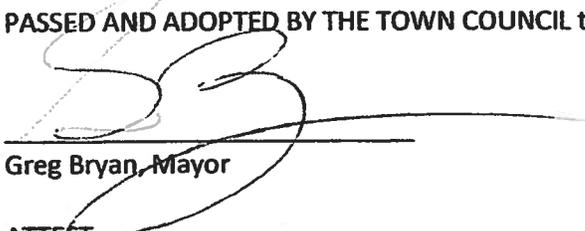
WHEREAS on July 20, 2009, Secretary of the Interior Ken Salazar issued a two year segregation order limiting new mining claims on nearly one million acres of federal public lands surrounding Grand Canyon National Park; and

WHEREAS, since the issuance of the Segregation Order in 2009, the Department of Interior has been evaluating whether to withdraw federal public lands from mining for an additional 20 years;

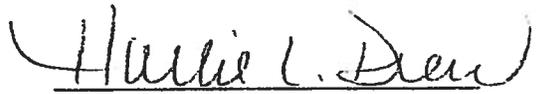
NOW THEREFORE BE IT RESOLVED BY THE TUSAYAN TOWN COUNCIL, COCONINO COUNTY, ARIZONA AS FOLLOWS:

The Tusayan Town Council supports Secretary of Interior Salazar's proposal to withdraw the lands consistent with the current two-year Segregation Order for an additional 20 years.

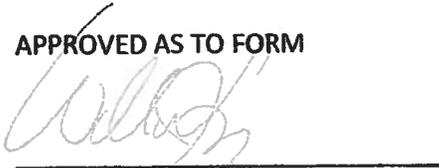
PASSED AND ADOPTED BY THE TOWN COUNCIL this 23<sup>rd</sup> day of March, 2011.

  
\_\_\_\_\_  
Greg Bryan, Mayor

ATTEST

  
\_\_\_\_\_  
Hollie L. Drew, Town Clerk

APPROVED AS TO FORM

  
\_\_\_\_\_  
William J Sims, Town Attorney



Carl Taylor  
District 1

Elizabeth C. Archuleta  
District 2

Matt Ryan  
District 3

Mandy Metzger  
District 4

Lena Fowler  
District 5

April 19, 2011

Northern Arizona Proposed Withdrawal Project

Attn: Scott Florence

District Manager

Bureau of Land Management Arizona Strip District Office

345 East Riverside Drive

St. George, UT 84790-6714

BUREAU OF LAND MANAGEMENT  
ARIZONA STRIP FIELD OFFICE  
APR 25 2011

Dear Scott:

Coconino County appreciates the opportunity of participating in the development of the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement as a cooperating agency. Unfortunately, because of the compressed time frame, the huge amount of data generated, and the complexity of the issues, there was not as much time as would have been ideally desirable for full engagement in the development of the Draft EIS (DEIS).

The County Board of Supervisors has previously taken a position on future uranium mining in Coconino County through the adoption of Resolution 2008-09 on February 5, 2008. That resolution, which is attached, cited the value of the Grand Canyon to the regional economy and the importance of the Grand Canyon to the nation, the deleterious effects of prior uranium mining in the County, and the risks involved with future mining.

In keeping with the Board's prior action and current sentiment, **the Board of Supervisors supports Alternative B, the Proposed Action, which would involve a 20-year withdrawal of 1,010,776 acres of Bureau of Land Management lands from operation of the Mining Law subject to valid existing rights.** There is little justification for any risk posed by future uranium mining to both known and potential environmental impacts to the Grand Canyon, nor is there enough positive economic benefit to risk serious damage to resources or to the regional economy.

April 19, 2011

Bureau of Land Management Arizona Strip District Office

Attn: Scott Florence

Page 2

The Board would like to offer the following substantive comments on specific sections of the DEIS, as well as offer specific comments about other aspects of the DEIS and uranium mining in general:

### Blending Alternatives

At one of the cooperating agency meetings early in the process County staff asked whether one of the considered alternatives could be full withdrawal in one or two of the

three areas and partial withdrawal in another area, and that option was rejected. The County presumes that this is due to the methodology used to create the partial withdrawal scenarios, which was dependent on overlays of a number of resources. We acknowledge that the position of Mohave County is different than ours, but also recognize that mining on the west side of Kanab Creek, which is the County boundary, could have impacts on water quality or springs in Kanab Creek or to the Creek itself. **Coconino County has supported full withdrawal of the areas within the County, however, there is a possibility that some of the northwest portion of the North Area several miles west of Kanab Creek where there are relatively fewer resources could be left out of the withdrawal area in order to accommodate some level of future mining in addition to just the completion of valid existing claims.**

### Economic Impacts

**The economic conditions and economic impact sections of the EIS seem to have the most serious flaws. The potential positive impacts of mining are overstated and the economic impacts related to tourism are understated.** The relevant sections of the EIS are 3.16 and 4.16. First of all it is important to note that mining accounts for only 0.3% of jobs in the County (Table 3.16-1), and most of those are related to cinder pits and sandstone quarries, not what is typically thought of as hard rock mining with high paying jobs having a significant impact on the economy. The jobs are important to those who hold them, but the overall impact of mining as an employment sector in Coconino County is exceedingly small and would continue to be under any of the alternatives.

The discussion of the positive impacts related to mining employment starts on page 4-247. The initial text contains the number of jobs for each phase of mining, including planning, permitting, actual mining, and reclamation. The maximum number of jobs at any one time is stated to be 35, which in itself seems to be high based on a tour of the active mine in the North area (and is only supported by a cited personal communication from a single mining company representative), but the number of jobs is totaled over the 7-year life of a mine, yielding 75 employees. Multiplying by all 30 possible mines under the Reasonable Foreseeable Development for Alternative A yields 2,250 jobs (page 4-248). However, there are never more than 35 at one time for any given mine. Most employees have been counted numerous times to get to a total of 75. Furthermore, multiplying by the potential number of mines is exceedingly misleading as the method of operation is for only a small number of mines to be operating at any one time, perhaps two or three, with employees and equipment moving from one site to the next as one breccia pipe is exhausted and the next is ready to be opened.

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Bureau of Land Management Arizona Strip District Office

Attn: Scott Florence

Page 3

Likewise, the number of indirect jobs, if one agrees that the correct multiplier is nearly 2.0, which in this case is based on an economic model and not regional reality, is the total over the 20 years and not the number at any one time. Again, most jobs are counted multiple times. If one assumes that three mines were operating at any given time, this would mean direct employment of no more than 105 and indirect employment of 210, not the 4,398 indirect jobs cited in the DEIS.

**While the potential positive economic impact of mining is overstated, the economic impact of tourism in the region is understated.** On page 3-254 there is an explanation of the use of the IMPLAN model to estimate the economic impacts of tourism. According to the model, 25% of the five-county region's employment is attributable to tourism-related sectors. There is no question that 100% of the money spent at hotels, restaurants, bars, outdoor equipment stores, general merchandise stores, etc. is not entirely related to tourism. Local residents also patronize restaurants and other businesses. So the percentage of spending at such establishments that is basic, in other words generated from outside the region, is difficult to assess without collecting primary data from each establishment. Therefore secondary data and models are used to make the estimates. However, the DEIS preparers used the national averages estimated by IMPLAN to arrive at the conclusion that only 20% of the total employment in tourism-related sectors is attributable to tourism. This implies that spending in New York City and Los Angeles is a good model for spending in the Grand Canyon region, which is preposterous. In Coconino County, the spending at tourist-related businesses at the South Rim and nearby gateway communities that is attributable to locals is probably on the order of 1% or less, not 80% as the DEIS assumes. **The importance of tourism and the basic sector employment related to tourism to Coconino County is critical to the County's well-being.**

There is a sentence near the bottom of page 3-254 that states that employment related to mining is 4.4% lower than that provided by tourism, which must be a mistake after text above asserts that employment in tourism related sectors is 25% in the region and mining is 0.4%. The IMPLAN-derived employment for mining is 901 and the IMPLAN-derived employment for tourism is 53,222, so mining employment is 98% less than that provided by tourism, not 4.4%.

It should be noted that the potential economic impact of mining is derived from the indirect impact of salaries, spending, taxing, etc. related to the employees. There is no direct revenue from the mining companies through leases, royalties, property taxes or other taxes and revenues to local governments. This is unlike the economic impact of businesses related to the tourism sector that have a substantial positive economic impact on local governments through property taxes and sales taxes.

It is also important to note that according to the DEIS, and based on the possible exercise of valid existing claims, one third of the potential positive economic impact related to mining would still occur under Alternative B, full withdrawal. On page 4-255 there is a statement that there is 63% less economic impact under Alternative B than under Alternative A, the no action alternative. Furthermore, a reading of Section B.5 in the appendices would lead one to conclude that there was considerable guesswork involved in arriving at the likely number of future mines, albeit educated guesswork, adding to the speculative nature of estimating future economic impacts.

### Environmental Impacts

Needless to say, this is the focus of the DEIS and is the subject of most of its pages. However, the County will only discuss a few key aspects and let others with more technical expertise comment on the specifics of impacts to soils, vegetation, wildlife, T&E species and the whole range of other environmental issues.

#### *Water—Quantity and Quality*

According to the DEIS (Appendix B, page B-37), the estimated water use for each mine is estimated at 10.5 million gallons over a four-year mining period. While this is tiny compared to water use in Phoenix or Flagstaff, it is still a substantial amount of water. It is about 15% of the amount of water used in the community of Tusayan on an annual basis, for example. While small, **the potential for impacts on seeps and springs in the Grand Canyon is considerable.** When the County was serving as a cooperating agency on the Tusayan Growth Environmental Impact Statement between 1995 and 2000, water was one of the most critical factors, second only to economics. If that development had occurred, and if all of the water had been withdrawn from wells in Tusayan tapping the regional R aquifer, there could have been potential impacts to seeps and springs below the South Rim of up to 20%. Even with wells at Valle, 20 miles to the south, there would have been measurable impacts. The result was a proposal to bring water to the development from the Colorado River at Topock near Needles rather than risk impact on the Canyon's seeps and springs.

One of the additional reasons that a water source outside the region was selected was because of objections by the Havasupai of any reduction in flow at Havasu Springs. While the DEIS notes that withdrawals of groundwater in the South Area would result in a miniscule reduction in flow at Havasu Springs, there is nevertheless a potential reduction.

Withdrawals of groundwater from the East Area would have similar potential impacts on springs and seeps along the western side of Marble Canyon, an area that has received considerably less research. This is also true of potential mines in the North area, especially those proximate to Kanab Creek.

While it is presumably true that modern mines are more environmentally responsible than decades-old mines, the impact on water quality of historic uranium mines is an important part of the assessment. There are several references to water quality in Horn Creek below the Orphan Mine site on the South Rim, including one on page 3-60 that states that, "Drainage from the mine appears to have affected water quality in Horn Creek." On the National Park Service web site, in its description of the Tonto Trail between the Hermit and Bright Angel Trails, there is a statement that, "There is water in the bed of Horn Creek about half the time, but unfortunately it is radioactive so don't drink it unless death by thirst is the only other option." This is hardly a statement that one would want to see for numerous other springs along Canyon trails.

April 19, 2011

Bureau of Land Management Arizona Strip District Office

Attn: Scott Florence

Page 5

County staff also was told by BLM officials at one of the cooperating agency meetings that there is no requirement for the timely reclamation of mothballed mine sites. The Kanab North mine site has been mothballed since the late 1980's. Unlike a mine that proceeds totally according to plan, with exploration, planning, permitting, mining, and reclamation all occurring within a seven-year window, if the price of uranium declines and companies walk away from mines because they are no longer economically feasible to operate, reclamation could wait 50 or 100 years after a mine site is mothballed. Several years ago the Board of Supervisors toured the Kanab North mine site and there was water in the retention ponds, and the liner appeared to have significantly deteriorated over time, potentially allowing contaminated water to leak into underlying aquifers and affecting spring water quality, possibly decades later. This begins to suggest that the very long-term cumulative impacts on water quality are not very well understood.

#### *Dust and Soil and Air Quality*

Air quality is regulated by the Arizona Department of Environmental Quality whose office is in Phoenix. Monitoring of air quality in northern Arizona and especially on the Arizona Strip is not a high priority, especially in light of air quality issues in Arizona's urban areas. Uranium mining in the withdrawal area requires thousands of haul trips to the mill in Blanding, Utah. There does not appear to be any numerical analysis of the total amount of fugitive dust created through each haul trip, though this certainly could have been done. While it is probably true, as stated on page 4-18 of the DEIS, that "these impacts would be localized and temporary," **the cumulative impacts of thousands of trucks could result in very discernible dust clouds, particularly during dry months.** It should be noted that the amount of dust created by vehicles increases logarithmically with speed, and there is little or no way to regulate the speed of haul trucks on the unpaved haul routes.

In addition, there is apparently no required monitoring of soils along all of the haul routes for any potential increase in radioactivity levels. The haul route from each of the three areas to Blanding involves a trip of hundreds of miles, in most cases involving trucking through established communities such as Fredonia, Kanab, Flagstaff, Page, Cameron, Tuba City and Kayenta. **Monitoring of soils along the roadsides over all of the haul routes would be a daunting task, but one that should be required as part of the ongoing mining process by the companies or by the Arizona Department of Environmental Quality.**

Long term cumulative impacts on soil quality and radioactivity levels in soils are also typically not monitored over the long term. At the Pigeon Mine reclamation site, which from casual observation appears to have been extremely well done by the mining company, USGS tests at the site uncovered hot spots that had surfaced since the reclamation effort, demonstrating that **there is certainly the possibility of the impacts of radioactivity at mine sites being carried off site in a downstream direction years after reclamation.**

April 19, 2011

Bureau of Land Management Arizona Strip District Office

Attn: Scott Florence

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### Impact of New Roads

The DEIS contains estimates of the number of new roads that would be created through each alternative in order to access new mine sites. The numbers appear to be understated. On page 4-25, Table 4.2-16 shows that under Alternative A, the no action alternative, there would be 22.4 miles of new roads. This is 0.75 mile for each of the 30 mines expected to be developed. While some mines might be on or near existing roads, many would not. The access road to the Kanab North mine site is much longer than 0.75 mile. For those that are on existing roads, the roads would certainly have to be substantially upgraded to accommodate haul trucks, so it is unclear if these are counted as new roads. Regardless of the number of miles, the construction of new roads in areas where there are few existing roads that are of variable quality has implications. As pointed out in the DEIS, **new roads can open up more areas to recreationists, and this could be appreciated by some recreationists but resented by others who visit these areas to enjoy solitude and peace and quiet.** Also with any set of new roads comes fragmentation of the area that can have negative impacts on wildlife.

### Public Safety

There is a brief section on public safety and potential impacts on page 4-238. Some of the statistics cited are based on personal communications with one mining company representative and do not reflect national statistics on the probability of accidents for certain types of travel and certain types of roadways. While the number of vehicle accidents for any mode of travel is very very small relative to the total number of trips or the total number of miles traveled, it is indisputable that accidents happen. For example, accidents involving tour buses are infrequent but when they occur, they often make national news. The number of accidents compared to the total number of tours is almost infinitesimally small, yet the impact of each accident can be very large, with the potential for multiple deaths.

The DEIS states that for the 10-year period from 1980 to 1990 there were only five spills, though no other details are provided on the types of accidents that resulted in the spills, whether other vehicles were involved, whether there were injuries, etc. **The use of a large number of haul trucks over roads that can be heavily traveled by both locals and tourists certainly causes risks of future multi-vehicle accidents.**

Spills are an entirely different matter whether or not other vehicles are involved. If a haul truck overturns with a load of ore, remediation must be done, including not only the material spilled, but a large amount of soil around the spill. The remediation crew is not located locally but at the mill in Blanding, necessitating long travel times to reach the scene of the needed remediation. If that spill occurred along Highway 64 between Valle and Tusayan from a haul truck that originated at a mine in the South Area, this could have very major economic implications. Numbers in the DEIS can be used to illustrate this point. According to Table 3.16-17 on page 3-272, the annual economic impact of Highway 64 is \$438,960,909. If one makes the somewhat simplistic assumption that the economic value of that highway is evenly distributed on each day of the year, **there is an economic impact of over \$1.2 million per day. If clean-up and remediation took a week, the negative economic impact related to the spill would be \$8.4 million.**

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Bureau of Land Management Arizona Strip District Office

Attn: Scott Florence

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The haul route being discussed to carry ore from the South Area to Blanding involves trucking the ore out to Highway 64 near Red Butte, down Highway 64 to I-40, along I-40 to Flagstaff, north on Highway 89 by the Flagstaff Mall, through Doney Park, Timberline-Fernwood, and Cameron, east on Highway 160 through Tuba City, Tonalea, and Kayenta, and north on Highway 163 through Mexican Hat and Bluff to Blanding. A spill in or near any of the communities could be extremely disruptive to say the least.

#### Lack of Overall Management of Uranium Mining

While not specifically addressed in the DEIS, it becomes clear that multiple agencies are involved in the permitting and monitoring of mining activities. The BLM is responsible for surface disturbance and permitting of mines, roads and utilities. The Arizona Department of Environmental Quality regulates and permits air quality and has a role in monitoring surface water quality. The Arizona Department of Water Resources regulates groundwater withdrawals and wells. Other agencies monitor mine safety (OSHA) and haul truck safety (DPS). Coordination of all of these agencies in the permitting process is lacking, and of course there are a huge number of laws at both the state and federal level that sometimes help and sometimes hinder adequate monitoring. The result is a somewhat disjointed process that does not add confidence for citizens that everything is being done to ensure an adequate level of health and safety.

#### Lack of Knowledge

The DEIS does a relatively good job of pointing out holes in available information. For example, Section 4.2.2 on page 4-6 discusses the lack of available information on air quality and what was beyond the scope of the DEIS, including a lack of modeling on visibility and dispersion and a lack of detailed analysis of specific sites since the mining sites are not yet known. Section 4.4.2 on page 4-65 discusses unavailable information related to water quality, which includes the undetermined impact of prior mines and prior wells, lack of baseline information for many of the Canyon's seeps and springs that could be impacted by future mining activity, and direction and rate of groundwater flows that would indicate where and when future impacts might be detected and measured. Similarly, the USGS January 2011 Fact Sheet contains a section on information gaps that would greatly aid the evaluation of impacts. While it is never possible to collect 100% of the desired data, the **information gaps call into question whether the DEIS has addressed every possible impact, both short and long term.**

#### The Big Picture and Tradeoffs

As stated on page 4-253 of the DEIS, there is no clear goal of energy independence for the United States, and there is no connection between mining of uranium and the possible reduction of use of other sources of energy. The uranium mined in Arizona could easily be exported to international markets. If there was a clear connection, it might be easier to justify tradeoffs. For example, the Board of Supervisors recently approved a highly controversial wind energy project that will be built to augment energy supplies within Arizona. In order to approve the project, the Board had to overcome clear well-

April 19, 2011  
Bureau of Land Management Arizona Strip District Office  
Attn: Scott Florence  
Page 8

established and documented County goals to protect viewsheds and open landscapes that are very important to the local economy and to County citizens and tourists alike. Even in this case where the energy produced will stay in Arizona, the tradeoff of allowing huge wind turbines in major open spaces was not at all easy. Another big picture issue is the unresolved problem of the disposal of waste at nuclear power plants. While outside of the scope of the DEIS, if considering the whole issue from "cradle to grave," the lack of adequate disposal of waste is one of the cumulative issues.

**When the tradeoff is possible serious negative impacts to the Grand Canyon and to the local economy as a result for benefits that might not even be in this country, the choice is much clearer.**

Summary

**There is entirely too much risk, too many unknowns, and too many identified impacts to justify threatening one of the most important U.S. landmarks and one of the most world-renowned national parks for the relatively small economic benefit associated with mining of uranium in the Grand Canyon region. Therefore, as stated previously, the County supports the proposed action, Alternative B, which calls for a 20-year withdrawal.**

This letter was unanimously approved by the Board of Supervisors at a meeting on April 5, 2011.

Respectfully submitted,



Mandy Metzger, Chair  
Supervisor, District 4



Carl Taylor, Vice Chair  
Supervisor, District 1



Liz Archuleta  
Supervisor, District 2



Matt Ryan  
Supervisor, District 3



Lena Fowler  
Supervisor, District 5

cc: Senator John McCain  
Senator Jon Kyl  
Congressman Paul Gosar  
Governor Janice K. Brewer  
Ken Salazar, Secretary of the Interior  
Bob Abbey, BLM Director

**RESOLUTION NO. 2008- 09**

**A RESOLUTION OF THE COCONINO COUNTY BOARD OF SUPERVISORS  
OPPOSING URANIUM DEVELOPMENT IN THE VICINITY OF THOSE PORTIONS OF  
GRAND CANYON NATIONAL PARK AND ITS WATERSHEDS THAT LIE WITHIN  
COCONINO COUNTY, ARIZONA**

Whereas, the Grand Canyon National Park is one of the world's great natural wonders whose protection for future generations has long been a priority for the citizens of Coconino County: and

Whereas, the Grand Canyon National Park is an economic engine whose 5 million visitors per year contribute significantly to the economy of Coconino County: and

Whereas, more than 2,000 uranium mining claims have been filed since 2003 in the Tusayan Ranger district alone, the majority of them within ten miles of Grand Canyon National Park: and

Whereas, additional claims have been filed on lands managed by the Bureau of Land Management in the House Rock Valley: and

Whereas, the Kaibab National Forest on January 8 issued a decision memo permitting exploratory drilling for uranium deposits by Vane Minerals on the Tusayan Ranger District within two miles of the boundaries of the Grand Canyon National Park: and

Whereas, previous uranium development operations in Coconino county have left long term contamination problems that continue to harm the health of citizens of Coconino County and have contaminated creeks and aquifers providing public drinking water: and

Whereas, Horn Creek in the Grand Canyon National Park is contaminated with the typical legacy left behind from prior and existing uranium mines places undue costs and adverse impacts on the tax payers of Coconino County: and

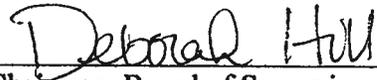
Whereas, uranium development on the Tusayan Ranger District and the House Rock Valley will adversely affect unique ecosystems and endangered species, and pose potential threats of long term contamination to the Grand Canyon National Park, the Colorado River and those who use its waters, and the water supplies of communities such as Tusayan and Valle;

**NOW THEREFORE BE IT RESOLVED THAT:**

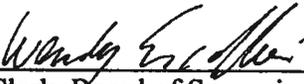
1. The Coconino County Board of Supervisors opposes uranium development on lands in the proximity of the Grand Canyon National Park and its watersheds:
2. Coconino County will monitor uranium development in the Tusayan Ranger District, lands managed by the Bureau of Land Management in House Rock Valley, and State Trust Lands in the Cataract Creek watershed, and actively comment where appropriate

3. The Coconino County Board of Supervisors hereby supports the withdrawal of the Tusayan Ranger District of the Kaibab National Forest and the lands in House Rock Valley managed by the Bureau of Land Management from mineral entry
4. The Coconino County Board of Supervisors requests the Arizona Congressional Delegation initiate the permanent withdrawal from mining, mineral exploration, and mineral entry on all Federal Lands in the Tusayan Ranger District of the Kaibab National Forest and the lands managed by the Bureau of Land Management in House Rock Valley
5. The Coconino County Board of Supervisors further requests that the Land Commissioner for the State of Arizona place a moratorium on mineral leasing and development on those State Trust Lands within the Cataract Creek drainage that lie within Coconino County, and those that lie within House Rock Valley.

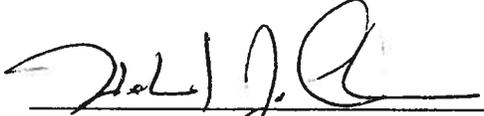
**APPROVED AND ADOPTED** this 5th day of February, 2008, by the Coconino County Board of Supervisors.

  
\_\_\_\_\_  
Chairman, Board of Supervisors

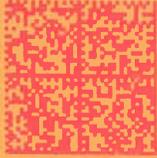
ATTEST:

  
\_\_\_\_\_  
Clerk, Board of Supervisors

APPROVED AS TO FORM:

  
\_\_\_\_\_  
Deputy County Attorney

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**Coconino County Board of Supervisors**  
219 East Cherry Avenue  
Flagstaff, AZ 86001 - 4695

**Northern Arizona Proposed Withdrawal Project**  
**Attn: Scott Florence**  
**District Manager**  
**Bureau of Land Management Arizona Strip District Office**  
**345 East Riverside Drive**  
**St. George, UT 84790-6714**

FRI 22 APR 2011 AM

DEPARTMENT OF THE ARMY

