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May 24, 2011

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

Dear Mr. Florence:

I am writing in opposition to the withdrawal of 993,549 acres of public land and National Forest System land from mining and am hereby registering Mohave County's support for Alternative A - No Action as presented in the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement.

Our interest in this issue is based on the detrimental economic impact a withdrawal will have on Arizona and surrounding states. Uranium mining represents a direct and indirect infusion of \$29 billion for my region over the life of these mines. On February 5, 2009, the Mohave County Board of Supervisors, in concert with National Association of Counties (NACo) adopted Resolution 2009-040 urging Congress to preserve access to these vitally necessary ore bodies.

Mohave County's experience dealing with federal land issues has not been favorable. On January 11, 2000, under Presidential Proclamation 7265, more than one million acres were set aside for the Grand Canyon—Parashant National Monument. This land mass is larger than the State of Rhode Island. There was no coordination with local governments. This resulted in the loss of one of the richest, cleanest coal reserves in the United States. We had no choice in the matter. It did not matter what the economic impact would be on the surrounding states.

Again, we face the same issue even though it is clear under 43 USC 1712—Sec. 1712. Land Use Plans that "(a) Development, maintenance and revision by Secretary. The Secretary shall, with public involvement, and consistent with the terms and conditions of this act, develop, maintain and, when appropriate, revise land use plans which provide by tracts or area for the use of public lands." There has been no coordination with local governments to devise or alter any land use plans.

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The notice of segregation stated that the Northern Arizona Proposed Withdrawal was necessary to preserve the Grand Canyon watershed. 74 Fed. Reg. 35887 (July 17, 2009). The scientific documentation provided to the DEIS by the Department of the Interior's agencies has clearly demonstrated that uranium mining does not threaten the watershed of the Grand Canyon and a withdrawal is not necessary. Since no such threat has been credibly documented, the proposed withdrawal does not meet the essential criteria for a withdrawal.

On February 16, 2010, Mohave County entered into Agreement No. AZ-2010-17 a Memorandum of Understanding as a Cooperating Agency to prepare an Environmental Impact Statement for the proposed withdrawal of lands for up to 20 years from location and entry under the Mining Law of 1872. It soon became apparent that BLM had a predetermined outcome to this EIS.

For the above reasons, as well as in the interest of the economic well being of the people of Mohave County and the region, I urge you NOT to withdraw these lands.

Sincerely,

Buster D. Johnson
Chairman
Mohave County Board of Supervisors