from: Tjan Zaotschnaja
Weitlsh. 141
80995 München, Germany

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE
MAY 02 2011

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

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 Tjan Zaotschnaja, 26.04.2011

www.aktionsgruppe.de

Dr. Alfred Rengstl
Am Zoglerberg 8
84571 Reischach
Germany

Was ein Mensch an Gutem in die Welt hinausgibt, geht nicht verloren
Albert Schweitzer

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAY 0 2 2011

Secretary Ken Salazar
U.S. Department of the Interior
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345 East Riverside Drive
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Yours

Alfred Rengstl

Ute Mischnick
Langenhaemperweg 15
45147 Essen
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 28 2011

No uranium mining at the Grand Canyon!

Dear Secretary Salazar,

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Yours

Ute Mischnick

www.aktionsgruppe.de

Dear Bureau of Land Management,

This is in reference to the public comment period for the Northern Arizona Proposed Withdrawal Tract Environmental Impact Statement.

I strongly support the BLM withdrawing 1 million acres around the Grand Canyon from location or entry of hard rock mining claims for 20 years.

My son & I have camped in this area for decades – it is an important area for American Citizens on vacation. It is part of our heritage.

Thank you for your consideration,

Karen Anderson

(303) 258-9258

CPEHS
1579 madison Ave
10029

NEW YORK NY 100
20 APR 2011 PM 3 L

Bureau of Land Management
Arizona Strip District
345 East Riverside Drive St
George, UT 84790

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAY 0 2 2011

Allyson Chavez
4/10/2011

To whom it may concern,

My name is Allyson Chavez. I'm a freshman at a high school called Central Park East High school. I was born in Ecuador where I was very wealthy and owned a lot of land. Since I was a little girl I have been taught to love and appreciate nature, to protect it, to respect it. A lot of kids my age just don't care and just don't see what I see when they see a beautiful flower or a harmless animal – because they were not exposed to nature as I was. This earth is not ours; we don't have the right to destroy it. I moved to The United States at the age of 8 I went from a beautiful mansion with acres of land filled with animals and beautiful flowers to an apartment in New Jersey. Two years later I moved to the Bronx and it pains me to see how dull and lifeless this place is. When I desire to watch the stars at night I can't because always buildings are covering the beautiful sky. My current school is two blocks away from Central Park, I go there when my mind is in trouble and whenever I need to escape from the buildings. There I feel at home, the sight of flowers, the simple thought of a place that hasn't been touched, nor destroyed by us puts my heart to peace. We have taken and destroyed too much land for you guys to allow those mining companies to take land away from the Grand Canyon. One day I want to go see that beautiful untouched place and when I do, I don't want to see mining companies taking away its beauty. We have to protect the little untouched land we have. If you guys allow them to win and take that land they won't stop there, they're going to want more, and more till it's all gone and that untouched beauty is all gone and all you can see is mining machines all around. Before you go to sleep think about this, do you want your children, your grandchildren to blame YOU for allowing them to take and destroy such beautiful place as the Grand Canyon is? I'm sure you don't because deep inside you care about this too, for one moment step outside your office, take off the suit and just look around and ask yourself "Is this what I want for my kids? to see all buildings, streets, mining machines nothing that is appealing to the eye?" I bet if one day you go to the Grand Canyon as a regular person, no suit nor suitcase, just you, with your heart and your eyes and you sit there and ask yourself "Do I really want to destroy this place?" I'm sure you don't. Please push to protect the Grand Canyon from private companies.

Sincerely,

Allyson Chavez

Allyson Chavez

I CARE ABOUT DRILLING IN THE GRAND CANYON: **KEEP OUR PUBLIC LAND MINE FREE!**

NAME	SIGNATURE
Desiree Orellana	Desiree Orellana
Sarah Bagu	Sarah Bagu
Franklin Agustiyes	
sandy chen.	Sandy Chen
Carlos Abreu	Carlos Abreu
Alexus Bright	Alexus Bright
Kayla washington	Kayla Washington
Orcka Smith	Orcka Smith
Chelsea Cates	Chelsea Cates
Jomarie Mosqueda	Jomarie M.
Kayla Navarro	Kayla Navarro
Tania silva	Tania Silva
Susana Romero	Susana Romero
Radhames Carela	Radhames Carela
JOHN SCHNATTERLY	
Tanaya Johnson	
Dilaruislam	Dilaruislam
Andry Rosario	Andry Rosario
Kelly coughman	Kelly Coughman
DANA Gigi McCLATEN	Gigi M.
Jada woodman	Jada Woodman

I CARE ABOUT DRILLING IN THE GRAND CANYON: **KEEP OUR PUBLIC LAND MINE FREE!**

NAME	SIGNATURE
Kelly Cooper	[illegible]
Dulce lopez	Dulce lopez
Mass Niang	Mass Niang
Vanessa lopez	Vanessa lopez
Roberta Matos	Roberta Matos.
Intisar Abdulmumin	Intisar Abdulmumin.
Louise Montgomery	L. Montgomery
Amy Paskal	[illegible]
Stephanie Bodden	Stephanie Bodden
Estephania Macias	Estephania Macias.
Patrice Wagner	Patrice Wagner
Cayetano Vargas	Cayetano Vargas
LiDin Choo	LiDin Choo
Da'nejea Mcdowell	[illegible]
Michelle Mendoza	Michelle M
Lesly ilysa Vasquez	Lesly ilysa Vasquez.
Susan McAuley	Susan C. McAuley
[illegible]	ERIN F. ROBERTS
Naomi FRANCIS	[illegible]
Marian Dwyer	[illegible]
Shoseanna Bebeers	[illegible]

I CARE ABOUT DRILLING IN THE GRAND CANYON: **KEEP OUR PUBLIC LAND MINE FREE!**

NAME	SIGNATURE
Lamont Sparrow	Lamont Sparrow
Tanya C Gonzalez	Tanya Gonzalez
Rafaela Pichardo	Rafaela Pichardo
Melissa Fleming	[illegible]
Jessica green	[illegible]
Hua Hoo	[illegible]
Thanayri Veras	Thanayri Veras
Cesar Salcedo	Cesar Salcedo
Charles Smith	Charles Smith
Ethan Reyna	Ethan Reyna
Chantel Acosta	Chantel Acosta
Moises Bruno	Moises Bruno
Shaquelle McGuan	Shaquelle McGuan
Ashley De los Santos	Ashley De los Santos
Destiny Casillas	Destiny Casillas
Julissa Pineo	[illegible]
Nuris Diaz	Nuris Diaz
Franco "Mad Dawg" Muzzio	[illegible]
Myrna Velez	Myrna Velez
Keiro Hernandez	Keiro Hernandez
Jose A. Reyna	Jose A Reyna

I care about drilling in the grand Canyon.

Kaniece Williams	Kaniece A Williams
(Miranda, LCSW)	Vilma Miranda - For Grand Canyon Cause
Samantha Cortez	Samantha Cortez
Bianna Cadet	[illegible]
Teamaré Gastón	[illegible]
Yaser Himed	[illegible]
Viviane Puhalovic	[illegible]
Bennett Lieberman	[illegible]
Samantha Goodman	Samantha Goodman
Maritza Cabezas	[illegible]
Lorenca Flores	Lorenca Flores
Mohamed Kargbo	[illegible]
Talia Javid	[illegible]
Gennez Castillo ♡	Gennez Castillo
Jessica Diaz	Jessica Diaz
Karina Diaz	Karina Diaz
Kenia Marte	Kenia Marte
Brenda Lopez	Brenda Lopez
Stephanie Vasconez	Stephanie Vasconez
Jessica Martinez	Jessica Martinez
Valerie Chalen	Valerie Chalen
Elizabeth Ortega	Elizabeth Ortega

I CARE ABOUT DRILLING IN THE GRAND CANYON: **KEEP OUR PUBLIC LAND MINE FREE!**

NAME	SIGNATURE
Leyamah A	Leyamah Alexis
Shaquon Cates	Shaquon Cates
Alma Brown	Alma Brown
Kelvin George	Kelvin George
Eric Almanzar	Eric Almanzar
Calvin George	Calvin George
Orlando Pinnock	[illegible]
Allyson Chavez	Allyson Chavez

State of Utah
OFFICE OF THE GOVERNOR
Public Lands Policy Coordination Office
5110 State Office Building
P.O. Box 141107
Salt Lake City, Utah 84114-1107

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Scott Florence
BLM, Arizona Strip District Office
345 Riverside Drive
St. George, UT 84790-6714

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State of Utah

GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Office of the Governor
PUBLIC LANDS POLICY COORDINATION

JOHN HARJA
Director

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAY 0 2 2011

May 4, 2011

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

Subject: Northern Arizona Proposed Mining Withdrawal
BLM Identification Number: 2300 (AZ9100) AZA-035138

Dear Mr. Florence:

The State of Utah has reviewed the proposed withdrawal of lands in Northern Arizona from the operation of federal mining laws. The proposal is generated by interest from the uranium mining industry to develop deep underground brecchia-pipe uranium deposits. The areas proposed for withdrawal are adjacent to Utah, and will have an effect on the economy of this part of southern Utah. The state has long supported access by rural Utah to the development of natural resources necessary for reasonable economic benefits associated with development of public land, while supporting environmental protections for important conservation objectives.

The State of Utah does not find justification within the Draft Environmental Impact Statement for the proposed action. Instead, the analysis in the DEIS demonstrates that the proposed withdrawal will not increase protection to conservation resources, but will instead have negative long-term economic effects on rural communities in Northern Arizona and Southern Utah. Therefore, because the proposed action will not significantly or appreciably increase protection for conservation resources, and will, in fact, cause unacceptable impacts to local economic drivers, the state urges the Department of the Interior to reject the proposed withdrawal.

The Federal Land Policy and Management Act, (43 U.S.C. § 1701-1787) sets out the requirements for the Secretary with regard to withdrawals. FLPMA (43 U.S.C 1714 (c)(4)) requires the Secretary to provide "an analysis of the manner in which existing and potential resource uses are incompatible with or in conflict with the proposed use, together with a statement of the provisions to be made for continuation or termination of existing uses, including an economic analysis of such continuation or termination." The underlying purpose of this exercise, and the analysis in the DEIS, is to analyze the merits of proceeding with the reasonably foreseeable locatable mineral exploration and development in and around the area proposed for segregation versus prohibiting mineral exploration in favor of the other natural, cultural and social resources in the area.

5110 State Office Building, PO Box 141107, Salt Lake City, Utah 84114-1107 · telephone 801-537-9801 · facsimile 801-537-9226

The analysis in the DEIS demonstrates that mineral extraction is not detrimental to use of the other resources valued in the region. Specifically, for example, on page 4-22 the analysis demonstrates there will not be impacts to air quality because "VISCREEN modeling efforts concluded the 'typical' mining project would comply with the criteria established by the EPA for maximum visual impacts inside Grand Canyon National Park." Further more, on page 4-251, the analysis concludes there will be no impacts to recreation economics, stating "[t]hese minor impacts are not expected to result in any measurable changes in the annual economic benefits of recreation." Similarly, concerning cultural resources, "Since avoidance is the primary mitigation measure for any project, it can be assumed that the total number of cultural resources that would need to be mitigated further through data recovery or other means for these projects is minimal and would not significantly change the historic or prehistoric character of the parcels; therefore no cumulative impacts to cultural resources are anticipated under Alternative A," the no action (no withdrawal) alternative (page 4-204 and 205). Finally, on page 217 the analysis states that the no action alternative "...would not result in any direct impacts to designated and proposed wilderness areas." The DEIS contains many other examples indicating the lack of demonstrable impacts due to the reasonably foreseeable mineral activity in the area.

In contrast, there will be negative effects from the proposed action to economic conditions other than recreation in this part of rural Utah. The economic data in Section 4.16 of the DEIS demonstrates the significant loss of high paying mining jobs due to the proposed withdrawal. In addition, Tables 4.16-3 and 4.16-9 in the DEIS reveal the proposed withdrawal would have a direct economic loss of over $2 billion, and the Tables 4.16-8 and 4.16-14 reveal the proposed withdrawal would reduce state and local business taxes through indirect means by approximately $135 million over 20 years.

Employment and tax revenue from good-paying mining jobs is important to the viability of the counties in the area, and the analysis in the DEIS supports this. As the DEIS so well states, "Alternative A [no action]could result in a beneficial, moderate, long-term impact to residents and local government as revenue generated through taxes would be redistributed to counties, which in turn would decide how to best allocate and redistribute revenue to local communities." (p. 4-250)

Because the analysis in the DEIS does not indicate an incompatibility or conflict between conservation resources and mineral extraction, the State of Utah requests the Secretary not authorize the withdrawal of the proposed areas from location and entry under the Mining Law of 1872.

The State of Utah appreciates the opportunity to review this proposal, and looks forward to further discussions concerning the proposed withdrawal and the analysis of its effects. Please direct any written questions regarding this correspondence to the Public Lands Policy Coordination Office at the address below, or call me at 801-537-9802.

Sincerely,

John Harja
Director

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE

MAY 0 2 2011

4-26-2011

Dear Secretary Salazar,

About 3 years ago I was given the opportunity to go rafting along the Colorado River and camping in the canyon. I had never understood the draw of the Grand Canyon and why so many people wanted to visit this national treasure. Once I saw it in person, I got it immediately. As an avid outdoor enthusiast I have seen much of the mountains and prairies in the United States, but not many are as beautiful and different as the Grand Canyon. So much of our land is already polluted or has been turned into concrete playgrounds. Please help keep this treasure safe by stopping the mining of nearby Uranium.

I am writing to ask you to please protect the full one million acres (Alternative B) around the Grand Canyon from mineral development. This 20-year withdrawal is needed to make sure one of our most valuable resources is preserved for future generations.

Uranium mining is a growing threat to the park, with eleven hundred mining claims within five miles of the Canyon. The National Forest area around the Grand Canyon is an important ecosystem that supports endangered species, sensitive habitat, recreational opportunities, and vital groundwater resources. Uranium so close to the Canyon could seriously impair the region's ecosystem and potentially pollute the Colorado River.

Please safeguard one of our most important national treasures by withdrawing the entire area described in Alternative B from location and entry under the Mining Law.

Sincerely,

Laura Kinman

4613 Sidereal Dr

Austin, Texas 78727

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BUREAU OF LAND MANAGEMENT
ARIZONA STRIP DISTRICT
345 EAST RIVERSIDE DRIVE
ST. GEORGE, UT 84790

- A WESTERN CLASSIC -

8473088714

Mayor
Nina Laycook
City Manager
Duane Huffman
Treasurer
RaeLene Johnson
City Attorney
Van Mackelprang

KANAB
UTAH

City Council
James G. Sorenson
Cheryl Brown
Ed Meyer
Steven R. Mower
Anthony Chatterley

BUREAU OF LAND MANAGEMENT
ARIZONA STRIP FIELD OFFICE
APR 28 2011

April 26, 2011

Bureau of Land Management
Arizona Strip District
345 East Riverside Drive
Saint George, UT 84790

RE: Public Input on Future Hardrock Mineral Development in Northern Arizona near the Grand Canyon

Gentlemen:
While we share in concerns for protecting the Grand Canyon National Park, we believe the protections are already in place by way of existing law, Forest Service and BLM policy, as well as applicable state and local permitting. Further, financial assurance requirements provide sufficient authorities and tools for protection of resources while providing for multiple use of the area. Therefore, Kanab City formally opposes adoption of the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement (EIS) and in addition to the above, finds that it does not meet the minimum standards of the law for the following reasons:

1. The EIS substantively ignored requirements of Section 1502.16(c) which requires discussions of possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned. For example:
    a. Nowhere in the EIS is there a discussion of uranium extraction and its impact on the national *Energy Research and Development Roadmap- Report to Congress- April 2010. Section 4.3.2 R&D for Sustainable Fuel Cycle Options, p. 31.*

    "The availability of fuel resources for each potential fuel cycle and reactor deployment scenario must be understood. Extended use of nuclear power may drive improvements in defining resource availability and on fuel resource exploration and mining. Primarily, this is work that the private sector would undertake, and how and when this would occur would depend on price and

(continued)

76 North Main No. 14 · Kanab, Utah 84741 · Phone 435-644-2534 · Fax 435-644-2536 · www.kanab.utah.gov

other market conditions. This is most relevant for a once-through approach, but even modified open cycles and full recycle systems may require comparable levels of natural sources of fuel for the foreseeable future."

b. Nowhere in the EIS is there a discussion of local land use planning or economic development plans.

c. Nowhere in the EIS is there a discussion of social and economic impacts on local communities as required by federal law.

2. The EIS list of preparers includes 52 entities, none of whom demonstrate skills in assessing social and economic impacts on local communities. In fact, the preparers are predominantly from agencies whose missions and training would lend them to a bias against resource development to provide social and economic benefit to such communities. By refusing to include preparers with an understanding of such impacts, the recommendations are biased by definition.

We are also concerned that the EIS choose to not consider alternatives that reduced the review period to 5 or 10 years. The justification for doing so was that there would be no changes so there was no need for more frequent review. If you fulfill your responsibility to consider the objectives and plans of other Federal agencies, you will recognize the extremely volatile nature of Utah's energy policy and the impact of international affairs on America's energy supplies. Energy prices impact America's economy which impacts our overall tax base including the funding for agencies such as the Bureau of Land Management and the U.S. Forest Service. Funding limitations have a direct impact on your ability to adequately meet your land management responsibilities. It would be wise to consider shorter term review periods that allow more rapid response to national needs.

Without the issues reference above being adequately addressed in the EIS, Kanab City has no option but to support Option A. Any other option is based on incomplete analysis and should not be considered.

Sincerely and unanimously,

Nina Laycook, Mayor

James G. Sorenson, Councilman

Cheryl Brown, Councilwoman

Ed Meyer, Councilman

Steven R. Mower, Councilman

Anthony Chatterley, Councilman

WASHINGTON COUNTY

197 East Tabernacle ♦ St. George, Utah 84770
Telephone: (435) 634-5700 ♦ Fax: (435) 634-5753

Employer of Choice

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JAMES EARDLEY
jim.eardley@washco.utah.gov

May 2, 2011

Mr. Scott Florence
District Manager
BLM Arizona Strip District
345 East Riverside Drive
St. George, Utah 84790

RE: Comments on Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement

Dear Scott:

Washington County would like to thank you and the Department of the Interior for granting an extension to the comment period on the recently released Draft EIS on the Northern Arizona Proposed Withdrawal. The draft statement is large and complex, and the additional time was necessary to study the issues at hand and to submit our response.

With that stated Washington County feels it is necessary to address several issues that it feels are germane to the Proposed Withdrawal Draft Environmental Impact Study. For the past several decades we have been able to see and assess first-hand the impacts that uranium mining in the proposed withdrawal area has had on our communities, the county, and the environment. We live in a unique area with splendid viewscapes, a fact that is not lost on us. Past County Commissions have supported responsible mining efforts throughout the late 70's and into the early 90's, and this support continues to the present. It is our express intent that these comments be carefully assessed and ultimately reflected in the final EIS.

Washington County would like to express its support for the "Alternative A – No Withdrawal" option in the recently released Draft Environmental Impact Statement (DEIS). In our opinion, the Bureau of Land Management has failed to prove that uranium mining is in any way a threat to the Grand Canyon or to the Colorado River water system, nor should this valuable and rich resource be locked up.

Specific Draft EIS Comments Follow:

Arizona Strip Wilderness Act of 1983 - This landmark legislation defined areas that were to be put into the National Wilderness Preservation System. It also included areas that were to remain open to mineral entry for uranium mining in the Grand Canyon area. The Wilderness Act is not included or referenced anywhere in the DEIS. Washington County was one of the local governments that, together with mining companies, environmental groups, grazers, local businesses, regulatory agencies and Congress, forged the compromise which led to its ultimate passage. The wilderness bill created 387,000 acres of BLM/USFS wilderness and released

540,000 acres. Most of the acres that were released are now within the 1 million-acre proposed withdrawal area. The unilateral withdrawal by the secretary would undermine the intent of the Congress and the legislation they passed which was signed into law by then President Ronald Reagan.

Ore Transportation - Ore transportation from the Arizona Strip to the mill in Blanding has never been deemed dangerous. There are no federal transportation regulations that deem hauling the ore to be a hazardous operation. No HAZMAT numbers are required or necessary. In the event of a spill, workers use shovels and/or rakes to clean up the rocks. No danger exists from the ore.

Any commercial trucking activity has inherent risks. During the 1980's, Energy Fuels Nuclear transported 58,800 loads of ore more than 17 million miles with only five spills. Each was easily cleaned up with shovels and rakes. Uranium ore is not considered a hazardous material.

Uranium Contamination of the Colorado River was one of the primary concerns raised by former Governor Napolitano and Secretary Salazar in implementing the temporary federal land segregation in northern Arizona. A recent study completed by the Arizona Geological Survey, conducted by Drs. Spencer and Wenrich using data published by the U.S. Geological Survey, concluded that 40 to 80 tons of dissolved uranium (not uranium ore) are currently being carried by the Colorado River through northern Arizona and the Grand Canyon every year.

According to their study, the proposed withdrawal area has one of the highest concentrations of naturally-occurring uranium in the world with many deposits exposed in the walls of the canyons across the area. Uranium has been eroding from these naturally-occurring deposits for millions of years and will continue to do so for millions more.

In the study, they considered a hypothetical, worst-case transportation accident in which a truck hauling thirty metric tons (66,000 pounds) of ore containing one-percent uranium is overturned by a flash flood in Kanab Creek and its entire ore load is washed into the Colorado River where it is pulverized and dissolved during a one year period and thereby becomes part of the dissolved uranium content of the river (a highly implausible, if not impossible scenario). The addition of 300 kilograms (660 pounds) of uranium over a one year period would increase uranium in river water from 4.00 ppb to 4.02 ppb, an increase of one-half of one percent - an amount they concluded would be undetectable against much larger natural variations in river-water uranium content.

Similarly, the United States Geological Survey and the University of Arizona both concluded that mining activities did not contaminate the watershed.

In the DEIS Executive Summary under impact on Water Resources, the following statements are made: "The impact on the Colorado River across all alternatives is none or negligible and of short-term to long-term duration. The impact on the Virgin River across all alternatives is none or negligible and of long-term duration." The DEIS fails to establish a scientifically sound reason to support the proposed withdrawal.

Modern Breccia Pipe Mining and Reclamation - Breccia pipe mining is not to be confused with open pit uranium mines. Breccia pipe formations are extremely compact and require surface disturbances of 20 acres or less, far different than the thousands of acres required to mine open pit resources. Small mines mean less dust, very little noise, and limited water use. Breccia pipe mine reclamation is relatively straightforward and extremely effective. The locations of several

pipes mined in the 80's and 90's are so thoroughly reclaimed that identifying the sites is difficult, even to the experienced eye. Those who imply that current mining would have the same impact as mining of 50 years ago are disingenuous.

Likewise, detractors of uranium mining continue to reference the very old un-reclaimed uranium mines on the Navaho Reservation. This continues to be an apples to oranges comparison. The uranium mines that were completed in northern Arizona were reclaimed so well that it is difficult to recognize where they were once located.

During the gold rushes of the mid-19th century, gold was dissolved in large vats of mercury which were then boiled off at great expense and peril to the environment. Similarly, many of the environmental safeguards and standards imposed on mine operators today were not in place when the earliest uranium mines began operation. Current mining standards govern all aspects of the mining operation. As stated in the DEIS, "A mine operator is required to provide the BLM with an approved financial guarantee that is adequate to cover the estimated cost to complete the reclamation plan **before** beginning activities." This guarantees that funding is available to complete reclamation activities should a mining company go bankrupt. The DEIS should not allow "legacy" mines to be utilized as a baseline for withdrawal consideration, even if environmentalist propagandists would like to.

The Impact of Mining on the Local Economy - A study by the American Clean Energy Resources Trust (ACERT) titled "Economic Impact of Uranium Mining on Coconino and Mohave County Arizona" (September 2009) was completed to measure the impact of withdrawing over 1,000,000 acres of public lands in northern Arizona from uranium mining and exploration. It concluded that **if** the proposed withdrawal is defeated and the industry were allowed to operate as it did in the 80's and 90's, the following is a conservative estimate of the benefits that would be realized in northern and southern Utah over a 42-year period.

- 1,078 new jobs in the project area
- $2 billion in federal and state corporate income taxes
- $9.5 million in claims payments and fees to local governments
- Increased property taxes for local governments
- Increased business for regional and national mining support vendors
- Increased state and local sales taxes
- $168 million in state severance taxes
- $1.6 billion to trucking firms transporting ore

At a time when Southern Utah's and Northern Arizona's unemployment is near 10%, it's extremely short-sighted to move forward with the withdrawal. This area could produce an average annual positive economic impact of $700 million (ACERT Sept. 2009 Study). This is slightly more than the $687 million (2005 figures) that the Grand Canyon takes in (for its 1,218,376 acres). Even the DEIS for the proposed withdrawal indicates there would be little interaction between the two groups (mine operation and tourists). As a side note, what would an EIS reveal about the withdrawal of the 5,000,000 annual visitors to the Grand Canyon National Park?

The DEIS has not demonstrated that mining would result in one lost dollar in revenue to tourism business and no harm to the Grand Canyon. Contrast that with the acknowledged $3.4 billion in uranium and hundreds of jobs to be had – as well as needed energy for our country.

Although the DEIS has failed to demonstrate how mining has had an adverse impact on the Grand Canyon's tourism trade, there is absolutely no question what the impact of the proposed withdrawal would be on mining related jobs and industry if it is enacted. Uranium miners earn on average $60,000 to $70,000 dollars per year plus benefits. The average tourism-related job in Arizona pays a paltry $21,000 per year while the national poverty level for a family of four is $22,300 per year. Again, the only viable alternative remains option 'A'.

The Withdrawal Order and Energy Independence - It's been stated that domestic uranium production supplies a mere eight percent of the uranium utilized by our nation's nuclear reactors, which in turn supply 20 percent of the United States' electricity. The remaining 92% is supplied by other nations such as Australia, Canada, or Russia. This is a powerful argument for the advocacy of domestic uranium production. With balance of trade problems, high unemployment, and a serious dependency on foreign nations for our domestic energy needs, any other option besides 'A' (no withdrawal) simply does not make sense.

The USGS estimates that northern Arizona contains at least 375 million pounds of the highest grade uranium ore in the United States. This is the equivalent of 27 billion kilowatt hours of electricity. This is the equivalent of all the electricity generated by all of the coal plants in the United States for 10 years. It has been estimated to be the equivalent of 13.3 billion barrels of oil, which is the total amount of recoverable oil in Prudhoe Bay. The conclusion for us is straight forward and simple. Any other option besides 'A' (no withdrawal) simply does not make sense.

Conclusion - Washington County urges you to address these shortcomings noted in the DEIS. The Secretary should not unilaterally disregard the findings and comprise wrought by the Congress and all other interested parties with the passage of the Arizona Strip Wilderness Act of 1983. The DEIS has failed to demonstrate with any credible evidence the impact of uranium mining on the waters of the Colorado or Virgin Rivers. No impact on tourism has been demonstrated by modern breccia pipe mining efforts that have been on-going for the past thirty years. The loss of mining related jobs, including the processing mill in Blanding and valuable trucking jobs is a given if the withdrawal is allowed to proceed. The loss of these jobs will only compound a difficult jobs market that currently exists in the Northern Arizona/Southern Utah area.

The withdrawal is not in the best interests of our area, the State of Utah, Arizona, or even the United States for the reasons we've listed and enumerated. It is our belief that DEIS could better reflect the very real conditions that exist here. It should be factually sound and not merely curry the favor of the Los Angeles Water and Power Department and other downstream water users, or of bureaucrats in Washington DC who have pushed and are pushing for the Withdrawal based on emotion or motive, but not science and fact.

Respectfully Submitted,

WASHINGTON COUNTY COMMISSION

Dennis Drake

Dennis Drake
Chair

cc: Secretary Ken Salazar