Kimberly MacMillan

From: **Lee Allison** <lee.allison@azgs.az.gov>
Date: Wed, May 4, 2011 at 6:37 PM
Subject: AZGS comments on DEIS for N. AZ Proposed Withdrawal
To: NAZproposedwithdrawal@azblm.org
Cc: Jon Spencer <jon.spencer@azgs.az.gov>

The Arizona Geological Survey submits the attached letter as comments on the Draft EIS for the Northern Arizona Proposed Withdrawal.

Lee Allison

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Janice K. Brewer
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May 4, 2011

Northern Arizona Proposed Withdrawal Project
ATTN: Scott Florence, District Manager
345 East Riverside Drive
St. George, Utah 84790–6714
NAZproposedwithdrawal@azblm.org

Dear Scott:

We are concerned that the proposed alternatives in the Draft EIS for the Northern Arizona Proposed Withdrawal Project are too limited, inherently biased towards draconian and potentially unnecessary restrictions on exploration and mining, and subject to political influence.

The alternatives offer only an overly simplistic , black and white approach to a complex situation. The Secretary of Interior has made public statements that imply a 'no action' alternative is politically unacceptable. The only decision remaining then is how much of the federal lands will be placed off-limits to exploration and possible mining for 20 years. This will simply push possibilities of making real progress on addressing economic and environmental issues on to the next generation.

We urge you to add additional alternatives that provide pathways to seriously addressing and resolving concerns raised over exploration and mining actvities and their potential impacts on the environment.

Questions have been raised about possible impacts of mining on groundwater and surface waters, on visual impacts affecting the tourism economy, on waste rock, and reclamation of mined-out deposits as among the biggest concerns.

In our discussions with companies engaged in exploration for uranium in northern Arizona, we have learned of innovative, but common-sense approaches to mining of breccia pipe deposits that have the potential to minimize,mitigate, or avoid many of the fears raised. Some of these include:

- Limiting the surface footprint of a mining project to perhaps 5-10 acres
- Creating berms or similar barriers of natural materials to hide operations from view
- Refilling breccia pipe mines with waste rock mixed with a concrete or similar slurry to seal the shaft, preventing rainfall and surface runoff from entering the mineand thus protecting groundwater resources
- Require surface restoration such as has occurred at the Pigeon Mine

We propose that at least one additional alternative be included in the EIS that would allow mineral exploration to continue across the area under the existing rigorous standards already in place. Concurrently, additional scientific, technical, and engineering studies would be carried out addressing the topics that are not adequately understood. Exploration companies would have the opportunity to develop the proposed new mining approaches suggested above, through limited prototypes and testbeds, in cooperation with the land management agencies. A full-scale mining operation that went through the permitting process would be as an instrumented, open, proof-of-concept model. Ground and surface waters proximal to the operation would be monitored before, during, and after the prospect is developed. Since the ore deposits are small, a complete mine life cycle could be completed in 3- 5 years, allowing a timely evaluation of new techniques. At that time, re-evaluation of impacts could be reassessed and more informed decisions could be made about the long term viability and co-existence of carefully managed and monitored development in this unique and uniquely resource-rich region.

Therefore, we propose adding an alternative to the EIS that will allow exploration to continue in the region while concurrent testing of new mining models be carried out under careful supervision and independent scientific, technical, and engineering monitoring and evaluation, to determine how or whether mining can be conducted safely.

Sincerely,

M. Lee Allison
State Geologist and Director