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Date: Wed, May 4, 2011 at 5:16 PM

Subject: Comments on Northern Arizona Proposed Withdrawal

To: "NAZproposedwithdrawal@azblm.org" <NAZproposedwithdrawal@azblm.org>

Cc: Lauren Pagel <lpagel@earthworksaction.org>, Heather White <white@ewg.org>, Nils Bruzelius <nils@ewg.org>

Dear Bureau of Land Management: Please accept joint comments from Earthworks and Environmental Working Group on the Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement. Please let us know if you have any questions.

Sincerely,

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May 4, 2011

Dear Mr. Florence:

Earthworks and Environmental Working Group are pleased to submit the following comments on the Interior Department's Northern Arizona Proposed Withdrawal Draft Environmental Impact Statement.

Earthworks is a nonprofit organization dedicated to protecting communities and the environment from the destructive impacts of energy and mineral development in the U.S. and worldwide. Earthworks works on the ground with many communities that have been directly affected by mining projects, including uranium mining, and has been working with these communities and others to protect the Grand Canyon and regional water supplies from the harmful consequences of uranium mining.

Environmental Working Group (EWG) is a nonprofit research and advocacy organization based in Washington, DC with offices in Ames, Iowa and Oakland, Calif. EWG has tracked the surge in mining claims near Grand Canyon National Park since 2007 and has highlighted the risks of uranium mining in the area through published reports, media coverage and outreach to conservation organizations, public officials and major Western water providers.

Recommendation: Alternative B

We urge the Secretary of the Interior to place off-limits to new mining claims the entire one million acres proposed for withdrawal for the full 20 years permitted under federal law – “Alternative B” in the draft environmental impact statement. Allowing uranium mining in this part of the Grand Canyon's watershed amounts to gambling with our most treasured natural landmark.

As Bureau of Land Management records show, mining interests hold approximately 3,500 claims in the 1.1-million-acre area adjoining Grand Canyon National Park, any one of which could be developed into a potentially polluting uranium mine.¹ A full withdrawal of the 1.1 million acres would prevent mining interests from staking new claims that would add to the likelihood of new environmentally damaging mining operations. A full withdrawal would not void valid existing claims, but it would require companies to meet tougher legal requirements before they could turn these existing claims into mines. Before mining can begin in areas off-limits to new claim staking, the

¹ Bureau of Land Management (BLM). LR2000 database, March 1, 2011 download.

Bureau of Land Management (BLM) is required to conduct a validity exam to establish that a claim contains a valuable mineral deposit, that the deposit was discovered before BLM put the land off-limits to new claims, and that the deposit continues to exist after the land has been placed off-limits.² These requirements would help prevent uranium mining that could threaten the park and surrounding areas.

The toxic history of uranium mining in the southwestern United States, including inside Grand Canyon National Park itself, along with the many unknowns about mining's potential impact on the park and the region, make uranium mining in this location a high-stakes roll of the dice. In its draft environmental impact statement, the Bureau of Land Management found that new mining could pose severe risks to the park and regional water supplies. At the same time, Interior Department scientists say that the lack of scientific information about the park's water supplies and ecosystems requires much more study. If the government fails to withdraw the million acres near the park, there may be no time to conduct the necessary studies before mining begins. Under the 1872 Mining Law, the Interior Department takes the position that it is virtually powerless to prevent mining on a valid claim.³

This lack of authority could impose high costs on taxpayers if additional uranium mines are proposed near the Grand Canyon. In 1995, the Clinton Administration negotiated a \$65 million deal to buy out a major gold mine that would have threatened Yellowstone National Park. That mine would have been built in the park's watershed three miles from the park itself. Part of the mine would have been located on claims that had been privatized under the 1872 federal mining law.⁴ While claim holders can no longer privatize claims, their largely unchecked ability to proceed with destructive mining on valid claims could effectively allow them to hold the Grand Canyon hostage and demand "ransom" payments from taxpayers to buy out their claims.

In addition, more than 2,000 of the claims are held by foreign companies, which could make it difficult for regulators to hold them accountable if mining harms the environment or human health. Major Western water providers have raised serious questions about the impact of uranium mining on the Colorado River – questions that the recent draft environmental impact statement did not answer effectively.

² U.S. Department of the Interior, What special provisions apply to operations on segregated or withdrawn lands? 43 C.F.R. § 3809.100 (2011).

³ U.S. Forest Service, Decision Memo, VANE Minerals Uranium Exploration Drilling Project, December 20, 2007. *American Colloid v. Babbitt* (American Colloid v. Babbitt). 1998. 145 F.3d 1152, 1156 (10th Cir. 1998).

⁴ Satchell, Michael. A New Battle over Yellowstone Park, U.S. News & World Report, March 13, 1995, pg. 34, 36. Havnes, Mark. Eureka! Gold Mine OKs Deal to Halt Mining Near Park, Salt Lake Tribune, September 26, 1997 at A28.

Finally, the relatively small amount of uranium that mines in the area would produce would likely be used for nuclear power – a form of energy that poses grave dangers, as demonstrated by the ongoing disaster at Japan’s Fukushima Daiichi plant. Why endanger our greatest natural treasure for a source of energy that carries so many risks? Withdrawing the full 1.1 million acres would provide the best opportunity to prevent uranium mining from harming this environmentally sensitive and visually spectacular natural wonder.

Toxic Legacy of Uranium Mining Looms over the Canyon

Uranium mining throughout the Southwest has left a toxic legacy that casts a shadow over the debate around the canyon. Members of the Navajo Nation have been afflicted with cancer and other serious health problems traced to uranium mines dug during the Cold War on their reservation in the Four Corners area of Arizona, Colorado, New Mexico and Utah.⁵ In 1979, a dam near Church Rock, N.M., holding uranium mining tailings and radioactive water burst and sent 1,100 tons of tailings and 93 million gallons of water into the Rio Puerco River. The release of toxic material traveled roughly 80 miles downstream, contaminating drinking water used by Navajos and their livestock.⁶ In 2009, the U.S. government began moving a 16-million-ton pile of uranium tailings away from the edge of the Colorado River near Moab, Utah, to prevent contamination of the water, at an estimated cost of \$1 billion.⁷ (Tailings, the sand-like particles left behind when ore is ground to extract uranium, have low levels of radioactivity and have been known to contaminate soil and water and produce radon, a gas that causes cancer.)⁸

⁵ Pasternak, Judy. Blighted Homeland: A Peril the Dwelt Among the Navajos, Los Angeles Times, November 19, 2006 at A1. Pasternak, Judy. Blighted Homeland, Oases in Navajo Desert Contained 'A Witch's Brew', Los Angeles Times, November 20, 2006 at A1. Pasternak, Judy. Blighted Homeland, Navajos' Desert Cleanup No More Than a Mirage," Los Angeles Times, November 21, 2006 at A1. Frosch, Dan. Uranium Contamination Haunts Navajo Country, The New York Times, July 26, 2009 at A15.

⁶ Brugge, Doug et al. "The Sequoyah Corporation Fuels Release and the Church Rock Spill: Unpublicized Nuclear Releases in American Indian Communities," American Journal of Public Health, September 2007, Vol. 97, No.9. Accessed online August 6, 2009 at <http://www.sric.org/Churchrock/SFChurchRockAJPH2007.pdf>. U.S. Environmental Protection Agency. NPL Site Narrative for United Nuclear Corp. (Federal Register Notice, Sept. 8, 1983). Accessed online April 13, 2011 at <http://www.epa.gov/superfund/sites/npl/nar766.htm>. Bureau of Land Management. Northern Arizona Proposed Withdrawal, Draft Environmental Impact Statement, February 2011. Accessed online March 21, 2011 at <http://www.blm.gov/az/st/en/prog/mining/timeout.html>.

⁷ Fahys, Judy. "Tons of Tainted Tailings are on the Move -- Finally," Salt Lake Tribune, May 4, 2009.

⁸ U.S. Department of Energy. Environmental Management, Uranium Mill Tailings Remedial Action, Introduction to Uranium Mill Tailings Remedial Action Program Office. Accessed online April 20, 2011 at <http://www.em.doe.gov/bemr/bemrsites/umtra.aspx>. Pasternak, Judy. Blighted Homeland, Los Angeles Times, November 19, 2006 at A1.

Uranium mining pollution has already affected Grand Canyon National Park itself. The Park's Horn Creek is contaminated with radioactivity whose source, according to the National Park Service, is a uranium deposit within a collapsed cave system known as a "breccia pipe." The Orphan Mine, located on the Grand Canyon's south rim, tapped into this rich deposit as recently as 1969. That mine produced some of the highest-grade uranium ever reported in North America. In a 2009 brochure, the National Park Service noted that "percolating ground water picks up traces of the radioactivity and carries it to the surface in the bed of Horn Creek," and it warned hikers not to drink water from the stream "unless death by thirst is the only other option".⁹

In 2000 and 2001, the USGS measured levels of uranium in Horn Creek at 29 parts per billion (ppb).¹⁰ In 2009, David K. Kreamer, professor of hydrology at the University of Nevada-Las Vegas, told the U.S. House of Representatives Committee on Natural Resources that he had detected elevated levels of uranium of 92.7 ppb in Horn Creek in 1995.¹¹ The U.S. Geological Survey reported that another researcher at the University of Nevada-Las Vegas reported finding "unacceptably high" levels of uranium in Horn Creek in an unpublished master's thesis completed in 1996.¹² A more recent unpublished master's thesis, prepared at Dresden, Germany in cooperation with Northern Arizona University, found uranium levels in Horn Creek as high as 400 ppb.¹³

The U.S. Environmental Protection Agency has set a legal limit of 30 parts per billion of uranium in drinking water. That level is a compromise that falls considerably short of EPA's human health goal, which is zero ppb.¹⁴ In an EPA publication on uranium mining, the agency notes that its drinking water standard for uranium is based on toxicity to the liver rather than the risk of cancer, but its drinking water standards list both cancer and liver toxicity as health problems that would result from long-term exposure.¹⁵

⁹ National Park Service. Tonto Trail: Bright Angel Trail to Hermit Trail, March 2009. Accessed online April 5, 2011 at <http://www.nps.gov/grca/index.htm> (search for "Tonto Trail" and select "Tonto Trail: Bright Angel Trail to Hermit Trail").

¹⁰ U.S. Geological Survey/National Park Service (USGS). "Chemical Characteristics of Ground-Water Discharge along the South Rim of Grand Canyon in Grand Canyon National Park, Arizona, 2000-2001." Scientific Investigations Report. 2004. Accessed online August 6, 2009 at <http://pubs.usgs.gov/sir/2004/5146/>.

¹¹ Kreamer, David K. Testimony to the Subcommittee on National Parks, Forests, and Public Lands of the U.S. House of Representatives Natural Resources Committee Hearing on the Grand Canyon Watersheds Protection Act of 2009, H.R. 644, July 21, 2009. Accessed online August 6, 2009 at <http://naturalresources.house.gov/Calendar/EventSingle.aspx?EventID=165807>.

¹² Supra note 10.

¹³ Liebe, Dirk (Liebe). 2003. The Use of the ²³⁴U/²³⁸U Activity Ratio for the Characterization of Springs and Surface Streams in Grand Canyon National Park, Arizona, masters thesis for Hochschule Fur Technik Und Wirtschaft, Dresden, Germany in cooperation with Northern Arizona University, 2003.

¹⁴ U.S. Environmental Protection Agency. Accessed online April 6, 2011 at <http://www.epa.gov/safewater/contaminants/index.html#rads>.

¹⁵ Supra note 14. U.S. Environmental Protection Agency (TENORM). 2008. Technical Report on Technologically Enhanced Naturally Occurring Radioactive Materials from Uranium Mining

Mining activity led to a different kind of problem at one of three Hack Canyon mines operated north of the canyon in the 1980s – one of about a dozen uranium mines operated near the canyon between 1956 and 2009, all of them in breccia pipes. The USGS reported that in 1984, a flash flood in a tributary where a mine was operating washed uranium ore and waste rock piles downstream. The mine operator recovered radioactive rock from the streambed as far as a mile away.¹⁶

New Mining Could Add to Historic Impacts

Kreamer and another independent scientific expert have warned that new mines, which will also exploit breccia pipes, could have severe consequences for the canyon and surrounding areas. Kreamer, who has studied water quality and quantity in the Grand Canyon's springs since the 1980s, told the U.S. House of Representatives Natural Resources Committee in 2009 that he is "profoundly concerned that mining [near the canyon] will damage the quantity and quality of Grand Canyon springs and the plants and animals that depend on those springs." Among those who depend on the springs are Native Americans and backcountry hikers.¹⁷

Kreamer said in a recent telephone interview that mines can consume up to 2.5 million gallons of water per year, potentially tapping an aquifer that is the likely source of springs that flow from the canyon's walls. Depending on the number and location of potential mine sites, he added, "many lower flow springs could be eliminated or critically diminished."¹⁸

Further, Kreamer told Congress, wells drilled to supply uranium mines with water could puncture so-called "perched aquifers" that supply water to springs higher up the wall of the Grand Canyon. These aquifers rest on top of impermeable rock formations and under normal conditions do not readily drain downward. "Piercing a perched aquifer," he added, "would have the effect of draining the perched aquifer and disrupting flow to springs."¹⁹

Like Kreamer, the BLM estimated that mines would use about 2.6 million gallons of water a year, or about five gallons per minute. The agency found that there are dozens of springs, seeps and streams in the withdrawal area, and inside Grand Canyon National Park itself, that have average flow rates of five gallons per minute or less.²⁰

Volume 1: Mining and Reclamation Background. Accessed online April 19, 2011 at <http://www.epa.gov/radiation/tenorm/pubs.html>.

¹⁶ Bureau of Land Management, *supra* note 6, at 3-105. U.S. Geological Survey and U.S. Department of the Interior (USGS). Hydrological, Geological, and Biological Site Characterization of Breccia Pipe Uranium Deposits in Northern Arizona, Scientific Investigations Report 2010–5025, 2010, at 117.

¹⁷ *Supra* note 11.

¹⁸ Kreamer, David K. (Kreamer). 2011. Telephone interview with David K. Kreamer, April 29, 2011.

¹⁹ *Supra* note 11.

²⁰ Bureau of Land Management, *supra* note 6 at 4-2 and Appendix D, Table D-1.

In a 2008 letter to Rep. Raul Grijalva (D-Ariz.), then chairman of the House Natural Resources Committee Subcommittee on National Parks, Forests and Public Lands, Abe Springer, a professor of hydrogeology at Northern Arizona University, wrote, “If mining or related mining activities were to cause [mineral] elements (and uranium) to become mobile and to enter the surface water or groundwater flow system, they would move toward springs or wells which drain the regional aquifer.”

Springer added:

“Once these elements became mobile through mining activities, they would continue to be mobile through the aquifer and eventually discharge at springs impacting the human uses of water of these springs. Although there is a lot of uncertainty in our understanding of flow in the regional aquifers and how it is connected to mineralization in these breccia pipes, what we do know should lead us to exercise the precautionary principle of doing no additional harm.”²¹

BLM Predicts Loss of Springs; USGS Requests More Study

Uncertainty was a major theme of both the BLM’s recent draft environmental impact statement and a USGS report on mining near the Grand Canyon, suggesting that allowing mining to proceed would be taking an unreasonable risk with the nation’s most famous national park. On the one hand, the BLM noted that “springs could dry up” as a result of miners’ wells tapping the regional aquifer. On the other hand, the BLM said that the springs could potentially recharge.²² BLM also said that mining could result in the “complete dewatering” of perched aquifers, yet it also argued that impacts to these aquifers would range from “negligible to moderate.”²³ As for pollution concerns, the BLM found that the risk to regional aquifer springs ranged from “negligible to major,” suggesting a wide range of potential harm.²⁴ Last year, the U.S. Geological Survey concluded that the risk of uranium mining to water flows and wildlife near the Grand Canyon could not be definitively calculated without further study. “The occurrence and movement of groundwater north of the Colorado River has never been fully described owing to the limited population in this part of northern Arizona and to a lack of data needed to complete an analysis,” the USGS wrote in one of several statements highlighting gaps in scientists’ understanding of the Grand Canyon’s ecology and hydrology.²⁵ As long as scientists are unsure what would happen as a result of uranium

²¹ Springer, Abe (Springer). 2008. Letter from Abe Springer, professor of hydrogeology at Northern Arizona University to Rep. Raul Grijalva, Chairman of the U.S. House of Representatives Committee on Natural Resources Subcommittee on National Parks, Forests, and Public Lands, March 24, 2008.

²² BLM, supra note 6 at 3-77.

²³ BLM, supra note 6 at 4-79.

²⁴ BLM, supra note 6 at 4-80.

²⁵ USGS, supra note 16 at 193.

mining near the Grand Canyon, the Interior Department should do all it can to prevent such mining.

Draft EIS Does not Allay Concerns about the Colorado River

The Colorado River, which runs through the Grand Canyon, provides drinking water to some 25 million people downstream. Two major water utilities have warned that uranium mining near the park could contaminate the river or damage public perceptions of the water's safety. Although the BLM downplayed the risk to the river of uranium mining near the canyon, the agency's environmental impact statement never addressed important concerns about pollution from the waste rock left behind by mining.

The Metropolitan Water District of Southern California (MWD), which supplies water to Los Angeles, San Diego and other cities, wrote to former Interior Secretary Dirk Kempthorne in 2008 that, "Metropolitan relies on high quality Colorado River supplies, and any activity that may threaten the quality of that supply is a critical issue for our organization... If adequate controls are not in place... mining activities could have the potential of contaminating drinking water sources. Uranium is a regulated radioactive constituent with significant health concerns associated with it. In addition to the public health impacts, exploration and mining of radioactive material near a drinking water source may impact the public's confidence in the safety and reliability of the water supply."²⁶

The Southern Nevada Water Authority (SNWA), which treats Colorado River water for residents of Las Vegas and surrounding communities, wrote Secretary Kempthorne in 2008 that a 16-million-ton pile of historic uranium mining tailings near Moab, Utah "contribute[s] measurable quantities of that contaminant into the Colorado River near Moab."

"This situation is exacerbated by the ongoing drought, which has reduced the level of dilution," the utility wrote. "Treatment for uranium on a municipal scale is both technologically challenging and expensive. Therefore, it is important to the SNWA that additional contributions of uranium from new sources be minimized so that our ability to meet Safe Drinking Water Act standards is not jeopardized."²⁷

Despite such concerns, the BLM's draft environmental impact statement suggested that uranium mining would pose little threat to the river's water quality. "Impact to the Colorado River from contaminated spring flow would be expected to be below the level of natural variation as a result of the large volume of water typically carried by the river (average minimum of 1.6 million [gallons per minute])," the agency wrote.²⁸ The BLM noted that two researchers "projected that the change in concentration of dissolved

²⁶ Metropolitan Water District of Southern California. Letter from General Manager Jeffrey Kightlinger to Secretary of the Interior Dirk Kempthorne, March 25, 2008.

²⁷ Southern Nevada Water Authority. Letter from General Manager Patricia Mulroy to Secretary of the Interior, Dirk Kempthorne, June 16, 2008.

²⁸ BLM, *supra* note 6 at 4-80.

uranium in the Colorado River in response to a hypothetical spill of 30 tons of high-grade uranium ore would be undetectable.”²⁹

However, permits for mines in the area suggest that the amount of waste rock on site could significantly exceed the estimate of 30 tons of high-grade uranium ore that Spencer and Wenrich used, and it is entirely possible that storms could wash these greater amounts of rock into drainage for the Colorado. A permit application for the Pinenut Mine, which Denison Mines Corp. would like to reopen inside the million-acre area, says that the mine will produce an estimated 40,000 tons of waste rock a year, a total of 160,000 tons over the four-year span that BLM projects for development and production phase of a breccia pipe uranium mine.³⁰ Other mines for which Denison has sought permits would produce even more waste rock: an estimated maximum of 54,750 tons per year, or 219,000 tons over four years, for both the currently operating Arizona 1 mine³¹ and the Canyon Mine³² that Denison is seeking to reopen; and 146,000 tons per year, or 584,000 tons over four years, for the proposed EZ Mine.³³ Waste rock from breccia pipes is likely to contain uranium and other heavy metals, including arsenic and lead, which can be toxic in water.³⁴

Flash floods occur in the Grand Canyon area and have been known to wash ore and waste rock downstream. The flood that washed ore and waste rock downstream from the Hack Canyon mine in 1984 is a case in point. “The amount of sediment from waste rock that could be released from any given storm event could be orders of magnitude greater than the 30 tons estimated” in BLM’s draft environmental impact statement, according to Jim Kuipers, consulting mining engineer who has worked at uranium mining operations in the Southwest and has consulted for Earthworks.³⁵ “All of the drainages south of the Colorado River are capable of high-volume flash floods and debris flows that can mobilize large amounts of rock and sediment...,” the USGS concluded. “These floods

²⁹ Spencer, Jon E. and Karen J. Wenrich. The Grand Canyon Breccia-Pipe Uranium Province, Northwestern Arizona. September 2010. Abstract supplied by BLM on file with Environmental Working Group.

³⁰ Denison Mines (USA) Corp. Class II Permit Application for the Pinenut Mine Project, Submitted to: Arizona Department of Environmental Quality Air Quality Division, January 2010. Accessed online April 25, 2011 at <http://www.azdeq.gov/environ/air/permits/denison.html>.

³¹ Denison Mines (USA) Corp. Arizona Department of Environmental Quality Air Quality Class II Permit, Denison Mines (USA) Corp. – Arizona 1 Mine, August 31, 2009. Accessed online May 2, 2011 at <http://www.azdeq.gov/environ/air/permits/denison.html>.

³² Denison Mines (USA) Corp. Class II Permit Application for the Canyon Mine Project, Submitted to: Arizona Department of Environmental Quality Air Quality Division, April 2010. Accessed online May 2, 2010 at <http://www.azdeq.gov/environ/air/permits/denison.html>.

³³ Denison Mines (USA) Corp. Class II Permit Application for the EZ Mine Project, Submitted to: Arizona Department of Environmental Quality Air Quality Division, June 2010. Accessed online May 2, 2010 at <http://www.azdeq.gov/environ/air/permits/denison.html>.

³⁴ USGS supra note 16 at 10, 49, 56, 59.

³⁵ Kuipers, Jim. Telephone interview with Jim Kuipers, April 27, 2011.

can effectively transport trace elements and radionuclides.” The USGS reported a similar finding for drainages north of the Colorado River.³⁶

How much of this contamination would make it into water supplies is unclear, but the USGS found that contaminants from uranium mine sites near the Grand Canyon can leach into water. The USGS conducted experiments on materials from mines near the park, including unprocessed uranium ore and mined waste rock, and found that “in some instances, uranium concentrations in the experimental leachates were very high – several hundred to several thousand parts per billion – but in natural settings such element-rich waters leached from mine sites are subject to very large dilutions as they mix with runoff.”³⁷ While Kuipers agreed that mine site contamination is subject to dilution from runoff, he said, “toxic pollution such as that contained in the leachates from uranium mines should be prevented and not allowed into surface water at all. Diluting toxic substances is an unacceptable substitute for not releasing them to the environment in the first place.”³⁸

Mining the Canyon Area Would not Improve U.S. Energy Independence

Ultimately, uranium mined near the Grand Canyon would be used to generate nuclear power, but it would not markedly advance the nation’s goal of energy independence.

Over the next 20 years, mining operations near the Grand Canyon could produce no more than 33,155 tons of uranium. That is only enough to supply the existing U.S nuclear power industry for about 1½ years, according to the BLM and World Nuclear Association.³⁹

If the U.S. were to build new power reactors, demand for uranium would grow accordingly. But nuclear power faces an uncertain future because of high initial investment costs, and Japan’s ongoing struggle to contain radiation leaks from the flooded Fukushima Daiichi nuclear power plant has raised new questions about whether we should support nuclear power at all – especially at the cost of potentially damaging the iconic Grand Canyon.⁴⁰

³⁶ USGS, supra note 16 at 143-144.

³⁷ USGS, supra note 16 at 130.

³⁸ Supra note 35.

³⁹ Supra note 6 at 4-39. World Nuclear Association. World Nuclear Power Reactors & Uranium Requirements. Accessed online April 20, 2011 at <http://www.world-nuclear.org/info/reactors.html>.

⁴⁰ Dvorak, Phred et al. Japanese Declare Crisis at Level of Chernobyl, Wall Street Journal, April 12, 2011 at A1.

Conclusion

Fully protecting the Grand Canyon and regional water supplies will require several reforms, including updating the 1872 Mining Law to give the federal government clear discretion to prevent mining on sensitive lands. Nevertheless, the Interior Department can – and should – act now to give the Grand Canyon maximum short-term protection by choosing Alternative B, a full withdrawal of the one million acres for 20 years.

Please let us know if we can provide additional information.

Sincerely,

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