



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
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March 22, 2012

In Reply Refer To:
2300 (9320)

Mr. Alan Gardner, Commissioner
Washington County
197 East Tabernacle Street
St. George, Utah 84770

Mr. Buster Johnson, Supervisor
Mohave County
PO Box 7000
Kingman, Arizona 86402-7000

Dear Mr. Gardner and Mr. Johnson:

This letter responds to your letter of February 6, 2012, requesting verification of quality of data and information disseminated in the Final Environmental Impact Statement (FEIS) for the Northern Arizona Proposed Withdrawal pursuant to the Data Quality Act (or Information Quality Act). I am responding on behalf of all officials named in your letter.

In your letter, you stated that you previously submitted a formal request for Data Quality verification, but that no formal response was ever made. The only letter of record we have with such a request is a letter from Leland Pollock, Garfield County Commissioner, submitted during the comment period on the Draft EIS, which was addressed as letter submittal number 246167 starting on page 5-89 of the Final EIS. The Final EIS specifically addressed this and other comments regarding the adequacy of the socioeconomic study, including use of the 2009 ACERT Report. As a result of Garfield County's and numerous other comments regarding the adequacy of the socio-economic analysis, a number of substantial changes were made from the Draft to Final EIS (see below).

The data/information for which you requested specific verification included the following:

1. Amount of viable uranium in the Arizona Strip
2. Economic loss to the communities
3. The social impact on communities
4. The economic impact on local governments

Regarding item 1, the U.S. Geological Survey (USGS) Report titled "Uranium Resource Availability in Breccia Pipes in Northern Arizona" (USGS Scientific Investigations Report 2010-5025) formed the foundational base for estimating the amount of uranium available throughout the withdrawal area. In addition, the reasonable foreseeable development scenario, which was developed for each alternative fully analyzed in the EIS, drew upon this report plus the professional experience and knowledge of Bureau of Land Management (BLM) and U.S. Forest Service (USFS) geologists and industry experts to predict what was reasonable in terms of expected exploration and development activities (including other uses such as expected levels of road development, water use, etc. associated with exploration and development activities) under each alternative. The USGS report was prepared using their rigid standards for peer-reviewed scientific publications.

As cooperating agencies, each coalition member county had full access to the preliminary Draft and Final EIS chapters and related reports during the internal/cooperating agency review periods and, therefore; had the opportunity to comment on all aspects of the EIS and supporting materials.

Regarding items 2 and 3, because of the large number of substantive comments on the adequacy of the social and economic data and analysis in the Draft EIS, between the Draft and Final EIS the BLM and its contractor, SWCA Environmental Consultants, retained additional socioeconomic expertise (BBC Research and Consulting) to review the comments and the DEIS economic analysis. That review determined that there were fundamental flaws in the DEIS economic analysis that needed to be addressed. That review led to a number of substantial changes made in response to those comments. The changes from the Draft to Final EIS are documented in Section 1.5.4 in the FEIS, but in summary included revisions to the economic impact methodology, dividing the study area into two pieces (north and south of the Grand Canyon), the addition of Garfield County to the study area, and more explicitly recognizing key uncertainties, limitations and unknowns in the economic effects analysis.

Many of these changes were made in direct response to the comments of coalition member counties during both the internal/cooperating agency reviews of the preliminary Draft and Final EISs, as well as comments submitted during the formal public review of the Draft EIS.

Regarding item 4, while it is true that the contractor stated at the cooperating agency meeting in Kanab, Utah on August 18, 2011, that he wasn't aware of any tax revenue to local governments, he also stated that he would further investigate the issue, which he did do. As a result, Chapter 4 of the FEIS included a full analysis of the impacts to taxes and revenues for each alternative. This is another example of how local Government input did have an effect on the process.

I hope that you find this responsive to your questions and concerns. If you have any questions, please contact Scott Florence, District Manager, Arizona Strip District Office, at 435-688-3200.

Sincerely,



Raymond Suazo
State Director

cc: Mike Williams, Supervisor
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