

**Center for Biological Diversity • Center for Native Ecosystems • Clean Water Action  
Colorado Citizens Against Toxic Waste • Colorado Environmental Coalition  
Defenders of Wildlife • Earthworks • Earthjustice • Environment America  
Environment Colorado • Environmental Working Group • Ethical Metalsmiths  
Grand Canyon Trust • Groundwater Awareness League  
High Country Citizens' Alliance • League of Conservation Voters  
National Parks Conservation Association • Natural Resources Defense Council  
New Mexico Wilderness Alliance • New Mexico Wildlife Federation  
National Trust for Historic Preservation • Oregon Wild • Pew Environment Group  
Save Our South Park Water • Sheep Mountain Alliance • Sierra Club  
Southern Utah Wilderness Alliance • Tallahassee Area Community  
The Coalition of National Park Service Retirees  
The Western Organization of Resource Councils • Washington Wilderness Coalition  
Western Colorado Congress • Western Nebraska Resources Council • Wild at Heart**

October 30, 2009

The Honorable Ken Salazar  
Secretary of the Interior  
1849 C St. NW  
Washington, DC 20240

Scott Florence, District Manager  
Arizona Strip District, Bureau of Land Management  
345 East Riverside Dr.  
St. George, UT 84790-9000

Re: Comments on Notice of Intent To Prepare an Environmental Impact  
Statement for a Proposed Withdrawal in the Vicinity of the Grand Canyon,  
Arizona, 74 Fed. Reg. 43,152-43,153 (Aug. 26, 2009)

Dear Sirs:

On behalf of 34 groups representing more than 2 million members and supporters, we would like to thank you for your action in July to protect nearly one million acres of land around Grand Canyon National Park from new mining claims for up to two years. We urge you to now withdraw those lands for twenty years, the longest duration possible under current law, to ensure that operations on existing claims do not threaten the Grand Canyon, and to work with Congress to permanently protect those lands and other precious American landscapes from hardrock mining.

The Grand Canyon is a timeless national treasure. Its unparalleled natural beauty, as well as its historic and cultural significance, makes the canyon an American icon. The canyon's jagged red cliffs and winding Colorado River offer recreational opportunities for visitors that range from hiking and rock climbing to camping and river rafting. The Colorado River provides drinking water for 25 million Americans living as far west as Los Angeles. Furthermore, the canyon and the surrounding areas are home to a rich diversity of plant and animal life, including 25 threatened and endangered animal species, and the visible strata in the canyon walls provide one of the most complete records of geological history in the world. Red Butte in the Kaibab National Forest contains Traditional Cultural Properties, shrines, historic trails and archaeological sites that are threatened with uranium mining. The Grand Canyon is a unique, valuable landscape that we treasure and must protect.

Unfortunately, a toxic threat is growing at the edge of the Grand Canyon. Due to the rising price of gold and uranium, the number of hardrock mining claims across the West has increased exponentially in recent years. As of January 2009, there were about 8,500 mining claims in the area proposed for withdrawal near the Grand Canyon, up from about 100 claims in January of 2003. Most, if not all, of these claims are for uranium and 1,100 of the claims are within five miles of the canyon. Mining could seriously impair the region's ecosystems, wreaking havoc on the landscape, drying up critical seeps and springs, disturbing fish and wildlife, and releasing toxic chemicals into the environment. With mining claims positioned so close to the canyon and the Colorado River, a range of contaminants from heavy metals to uranium could also degrade the downstream water supply of millions of Americans.

Your protection of nearly one million acres of land around Grand Canyon National Park for two years is a good first step to protecting our drinking water, fish and wildlife, and this treasured national park. We applaud this action and urge you to now select the longest permissible withdrawal period: twenty years.

We believe that a rigorous and comprehensive review of the potential impacts of an extended uranium mining boom will clearly demonstrate an unacceptable risk to the park. As the Department has noted, within the land area under consideration for withdrawal, there are an estimated 200 to 400 breccia pipes, the geologic formations of interest to the uranium industry. Though only a portion of these formations may hold mineable uranium, road-building, drilling, and other exploration activities in the vicinity of these potential deposits would significantly disrupt the park's delicate hydrologic balance and destroy important fish and wildlife habitat. What's more, mine development of even a modest percentage of these pipes could result in a significant lowering of the water table and bring with it additional plans for uranium milling and permanent radioactive waste disposal within the area.

We believe that the Department's planned environmental impact statement must fully consider these issues and the potential cumulative impacts of what could become a new mining district within the shadow of the park.

As the Department begins this important environmental review, we are hopeful that you will also take additional action to protect the park. We urge you to assure that all development proposals for existing claims are thoroughly reviewed, using complete and up-to-date baseline data and scientific analyses. In addition, we ask that you support the Grand Canyon Watersheds Protection Act, H.R. 644, which will offer the permanent withdrawal protection that is so clearly needed.

Still, neither the Grand Canyon nor dozens of treasured American landscapes like it will be safe until Congress permanently withdraws the nation's most treasured landscapes from operation of the mining law and ultimately reforms the 1872 Mining Law. As you know, this antiquated law allows gold, uranium, and other hardrock metals to be taken from most western public lands without a return to taxpayers and without adequate controls and cleanup requirements. We commend the Secretary for urging Congress to complete action on mining law reform, and—for the sake of the Grand Canyon and other irreplaceable public lands—we ask you to make this reform a priority for the administration.

Thank you for soliciting our input and for considering our views and those of our members.

Sincerely,

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