



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 2, 2011

Northern Arizona Proposed Withdrawal Project
ATTN: Scott Florence, District Manager
Bureau of Land Management
Arizona Strip District Office
345 East Riverside Drive
St. George, UT 84790-6714

Subject: Draft Environmental Impact Statement for the Northern Arizona Proposed
Withdrawal Project, Coconino and Mohave Counties, Arizona (CEQ#
20110041)

Dear Mr. Florence:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Northern Arizona Proposed Withdrawal Project ("proposed withdrawal") pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

We commend the BLM for developing a detailed DEIS that thoroughly analyzes Secretary of the Interior Ken Salazar's proposed 20-year withdrawal of approximately one million acres of federal mineral estate in northern Arizona from the location of new mining claims.

Based on our review of the DEIS, we have rated the Proposed Action (which represents the lands identified in the Secretary's proposed withdrawal) and the document LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). We recommend selecting the Proposed Action because we feel it will best protect sensitive resources in the proposed withdrawal area.

The greater Grand Canyon ecosystem, the surrounding Colorado Plateau, and the region's Native American population have sustained lingering impacts from uranium exploration and mining operations--impacts that include environmental degradation of the Grand Canyon watershed, pervasive human health effects, and disturbance and desecration of Native cultural resources.

Recognizing this legacy of impacts, and the potential for future degradation (particularly of Native American cultural resources, for which the DEIS states the potential for further disturbance and desecration is "very high"), Representative Raul

Grijalva, of Arizona's 7th District, introduced legislation on March 3rd to permanently block new mining projects on lands that include the proposed withdrawal area. The Proposed Action, while not as restrictive as Rep. Grijalva's bill, would provide greater protection for threatened environmental and cultural resources in the proposed withdrawal area. We recommend, therefore, that BLM select the Proposed Action.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: CED-2). If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

Enclosure: Summary of EPA Rating System