

Lower Colorado River Water Quality Partnership



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

Dear Mr. Florence:

Draft Environmental Impact Statement for Northern Arizona Proposed Withdrawal Project

This letter is being sent in response to the Bureau of Land Management's (BLM's) Draft Environmental Impact Statement (DEIS) for the Northern Arizona Proposed Withdrawal Project in the vicinity of Grand Canyon, Arizona. The DEIS documents potential environmental impacts of the proposed 20-year withdrawal of approximately one million acres of land from new mining claims under the General Mining Law of 1872. As part of the DEIS, four alternatives were evaluated: "No Action" (i.e., subject lands would remain open to mining); or either approximately 1,000,000; 650,000; or 300,000 acres of federal land to be withdrawn from operations for 20 years. The stated purpose of the withdrawals would be to protect areas along the Grand Canyon and the Colorado River from adverse effects of mining, except those effects stemming from valid existing rights.

BLM is commended for its leadership in evaluating the environmental effects of uranium and other mineral exploration and mining in the Grand Canyon area. The Colorado River provides a critical supply of municipal drinking water, agricultural irrigation water, water for wildlife habitat, and water for recreation for the Lower Basin states of Arizona, California, and Nevada. Protection of the Colorado River's water quality is vital to maintaining these beneficial uses. The Central Arizona Project (CAP), Metropolitan Water District of Southern California (Metropolitan), and Southern Nevada Water Authority (SNWA) are stakeholders with vested interests in the water quality of the municipal drinking water supplies for Arizona, California, and Nevada, respectively.

CAP operates and maintains a 336-mile long aqueduct system that supplies approximately 1.5 million acre-ft of Colorado River water to central and southern Arizona. CAP, which serves nearly 80% of the state's 6.5 million residents, supplies water to Pima, Pinal, and Maricopa Counties, including the greater Tucson and Phoenix metropolitan areas as well as numerous other cities and towns, tribal communities, industries, and farms.

Metropolitan is a consortium of 26 cities and water districts that provides drinking water to nearly 19 million people in Los Angeles, Orange, San Diego Counties, and parts of Riverside, San Bernardino, and Ventura Counties. The Colorado River is a principal water source for Metropolitan's 5,200 square-mile service area.

SNWA is a cooperative agency comprising representatives from the Big Bend Water District, Clark County Water Reclamation District, Las Vegas Valley Water District, and the cities of Henderson, Boulder City, Las Vegas, and North Las Vegas. SNWA gets nearly 90 percent of its water supply from the Colorado River and serves approximately 2 million people in the Las Vegas area.

Recently, CAP, Metropolitan, and SNWA signed a three-party memorandum of understanding to form the Lower Colorado River Water Quality Partnership (Partnership). The Partnership's purpose is to identify and implement collaborative solutions to address water quality issues facing the Colorado River and our respective agencies. Protecting the Colorado River's water quality is of paramount importance and, as such, the potential for degradation of Colorado River water quality through increased uranium mining in the Grand Canyon area is an issue of concern to the Partnership.

The U. S. Environmental Protection Agency has established drinking water standards for uranium and other radiological compounds due to their toxicity and carcinogenicity. Uranium is a radioactive constituent with significant associated health concerns. In addition to the potential public health impacts if not managed appropriately, exploration and mining of radioactive material near a drinking water source may impact the public's confidence in the safety and reliability of that water supply. Historical uranium mining has led to considerable environmental damage, with subsequent cleanup efforts taking decades to complete. One prime example is the uranium mill tailings pile that sits along the Colorado River near Moab, Utah. Although removal of the 16-million-ton tailings pile is underway, the remediation of this site comes with considerable costs and the prolonged threat to the Colorado River persists until final cleanup is complete. It is therefore critical that potential water quality effects are fully understood prior to the exploration and mining of uranium and other minerals in all areas proximate to the Colorado River and its tributaries.

The DEIS for the Northern Arizona Proposed Withdrawal Project indicates that all of the alternatives evaluated would result in a negligible increase in uranium concentrations in the Colorado River over historical background levels. It should be noted, however, that the effects of increased mining within the subject area may affect consumer confidence over the safety and reliability of the Colorado River for its use as a municipal drinking water supply, irrespective of any definitive public health impacts. Considering the tragic aftermath of the recent earthquake and tsunami in Japan, the public has a heightened concern over the potential for even minute amounts of radiation in water supplies. As such, it is critical that a comprehensive water quality monitoring program be in place to inform stakeholders and ensure long-term protection of the Colorado River from threats of uranium and other regulated constituents impacted by mining operations for all alternatives being investigated.

The DEIS also addresses the issue of water usage in the affected areas as a result of mining operations. Because extended drought in the Colorado River Basin has threatened available water supplies, CAP, Metropolitan, and SNWA have substantial concerns over additional consumptive uses of water that could result from extensive mining activities. Exploration and mining within the subject area may also lead to increased erosion and sediment loading along the tributaries to the Colorado River, potentially affecting salinity levels. CAP, Metropolitan, and SNWA participate on the Colorado River Basin Salinity Control Forum and are committed to efforts to control salinity inputs along the Colorado River. We request that the Final EIS clearly identify the potential impacts of large-scale exploration and mining activities in the subject area on salinity loading to the Colorado River. Each of these issues, water quantity impacts and water quality impacts, is important to CAP, Metropolitan, and SNWA.

Lastly, it is not clear whether the DEIS evaluated worst-case scenarios for each of the alternatives should the mitigation measures designed to prevent downstream transport of uranium-bearing material fail. Given the uncertainty in the location and number of mines to be operated under each alternative, the Partnership requests that worst-case scenarios be fully evaluated in the Final EIS in terms of the water quality effects on the Colorado River and its tributaries. As the Colorado River serves as a primary water supply to over 26 million people in Arizona, California, and Nevada, this information is of vital importance in evaluating the withdrawal alternatives.

The Partnership recognizes the significant efforts taken by BLM to evaluate the environmental effects of mineral exploration and mining on the water quality of the Colorado River. We appreciate the opportunity to comment on this DEIS and look forward to receiving the Final EIS and Record of Decision that identifies an alternative which ensures the long-term protection of the Colorado River and its tributaries. CAP, Metropolitan, and SNWA firmly believe that all efforts possible should be made to safeguard the public's drinking water sources. Thus, federal agencies with oversight over mineral exploration and mining operations in the Lower Colorado River Basin must use their authority to prevent any potential for deterioration of this critical water supply for millions of people. We thank you for your efforts to fully investigate this important issue.

Sincerely,



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Metropolitan Water District
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Patricia Mulroy
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cc: The Honorable Ken Salazar