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Ms. Sally Jewell, Secretary of the Interior
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Mr. Tom Vilsack, Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Mr. Neil Kornze, Director
U.S. Bureau of Land Management
1849 C Street NW, Rm 5665
Washington, D.C. 20240

Mr. Tom Tidwell, Chief
U.S. Forest Service
1400 Independence Ave., S. W.
Washington, D.C. 20250-0003

August 25, 2015

Subject: Amended Regulations Governing Mining on Public Lands

Dear Secretary Jewell, Secretary Vilsack, Director Kornze, and Chief Tidwell

Coconino County writes to express its support for the Grand Canyon Trust's petition for the issuance of amended regulations governing mining on public lands managed by the U.S. Bureau of Land Management ("BLM"), an agency within the U.S. Department of the Interior, and the U.S. Forest ("Forest Service"), an agency with the U.S. Department of Agriculture. This petition is specifically aimed to reform the rules governing uranium mining and mining operations that lapse into long periods of inactivity at the expense of public and environmental health.

Thousands of uranium mines were developed in our region since the 1940s, and a large proportion of these were abandoned by 1970. Today, within the Navajo Nation, the mines are closed, but uranium contamination remains, including over 500 abandoned uranium mines as well as homes and drinking water sources with elevated levels of radiation. Controlling environmental

releases from waste piles or cleaning up contaminated lands and water supplies has lagged far behind, and many past mining sites have had no reclamation.

Therefore, it is imperative to prevent further radioactive contamination in Coconino County and in the Grand Canyon, and to protect water resources within Coconino County and the larger Colorado River Basin. Examples of the radioactive contamination stemming from BLM and FS's current uranium mining practices are rife. Regional aquifer groundwater wells near the Canyon, Pinenut, and Hermit uranium mines in Arizona—all of which have been or were non-operational for long periods of time—contain dissolved uranium concentrations in excess of EPA drinking water standards.

Coconino County knows that BLM and the Forest Service have too few resources for too many tasks. Recognizing this, we endorse the fact that the Grand Canyon Trust's petition requires that the burdens to apply for permit renewals, and to provide better and more timely information regarding temporary closures and re-openings, fall primarily on mine operators. While BLM and the Forest Service would have to prepare updated environmental reviews for re-opened mines and conduct annual inspections in certain circumstances, the costs of doing so, like the costs of processing permit renewals, could be passed on to mine operators through cost recovery agreements.

Understanding first-hand the deleterious effects of inadequately regulated uranium mines, Coconino County urges BLM and FS to commence a rulemaking to correct the existing regulations by implementing the changes.

Finally, Coconino County is aware that two neighboring states, Colorado and New Mexico, have imposed more protective mining rules to protect state land and waters from uranium contamination. Indeed, the protective Colorado and New Mexico rules informed the Grand Canyon Trust's suggestions for changes to the federal rules. The State holds a critical role in the protection of our natural resources and of Arizona's crown jewel, the Grand Canyon. For this reason, Coconino County supports the State of Arizona improving state-level rules applying to uranium mines in order to best protect the Grand Canyon region from potential radioactive contamination.

Sincerely,



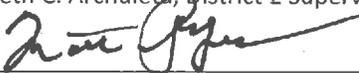
Art Babbott, Chair, Coconino County Board of Supervisors



Lena Fowler, Vice-Chair, Coconino County Board of Supervisors



Elizabeth C. Archuleta, District 2 Supervisor, Coconino County Board of Supervisors



Matt Ryan, District 3 Supervisor, Coconino County Board of Supervisors