

Comments By Gregory Yount

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Chapter One and Two

Page 1-15

The Arizona Wilderness Act of 1984 is not listed. This act was the cornerstone legislation that defined the areas that would be open for mineral entry around the Grand Canyon.

Page 1-21

Table 1.5-1

Air Quality and Climate: The detailed analysis of the cumulative impact on air quality was not done. The Cumulative Impacts section in Chapter 4 states:

There are other uses and activities for the lands within the proposed withdrawal area besides uranium mining (i.e., recreational activities, OHVs, livestock grazing, etc.). However, sufficient data are not currently available to quantify these other potential emission.

Table 1.5-1 states:

Air Quality and Climate

Release of particulates

The release of particulates (dust) from exploration drilling operations, mining, and ore hauling traffic and other vehicles on unpaved roads could have an effect on the regional air quality. **This could occur in combination with pre-existing emissions from coal plants, cities, traffic, and other sources of regional air pollution to create a cumulative regional effect on air quality.**

Increase in regional haze

Emissions from all exploration and development activity and equipment could contribute to the regional haze affecting air quality in the defined prevention of significant deterioration area, as well as affect overall scenic quality.

Table 1.5-1 cites cumulative impacts when added to coal plants, cities, traffic, and other sources of regional air pollution and Chapter 4 cites *recreational activities, OHVs, livestock grazing, etc.* Then states that there is not sufficient data to analyze and quantify these sources of potential emissions!

While I am sure that getting data for the above activities cited in Chapter 4 is difficult, the detailed analysis specifically called for did not mention any of these. The items to be analyzed in detail were *coal plants, cities, traffic, and other sources of regional air pollution.*

This is an example of BIAS by OMMITION! The cumulative impact analysis is actually quite easy to do and all the relevant data is easy to access. My analysis indicates that the additional pollution at all levels for uranium exploration and mining is negligible compared to the current levels being produced by all sources in the Air Quality Study Area. As the DEIS points out, there will be local affects, and these effects will have to be mitigated or satisfy State and Federal air quality standard in order to receive the permits required to operate a mine.

I have provided an outline and methodology of the required detailed analysis for cumulative effects on Air Quality in my comments for Chapter 4.

Table 1.5-1

Geology And Mineral Resources

The energy potential for uranium was never calculated for the withdrawal area or for those areas already cumulatively withdrawn. I did provide analysis for this in my comments for Chapter 3 or 4 or both.

Wilderness

Wilderness Areas

Designated wilderness is already withdrawn. However, mining adjacent to Wilderness Areas could affect the wilderness characteristics of these lands, including lands managed as wilderness in Grand Canyon National Park.

The Arizona wilderness Act of 1984 section (d) allows mining and other multiple use activities right up to the boundary of the wilderness and does not allow buffers to be created due the the effects of these activities. SEE comments and annotations in various other places in my commentary.

Table 1.5-1

Economic Conditions

Energy resources available

The withdrawal could lead to increased reliance on energy sources other than nuclear, such as additional mining elsewhere, imports of uranium from foreign sources, or production from equivalent amounts of other sources like coal, petroleum, natural gas, wind power, or solar.

The above analyses were never done. This is a BIAS by omission in the writing of this EIS and the level of thought that went into the justification for not doing these analyses indicate that the omission was purposeful. The justification is based on a false premise and the required analyses should be done and included in the EIS.

NEPA requires that indirect impacts must be analyzed. The EIS must identify all the indirect effects that are known, and make a good faith effort to explain the effects that are not known but are "reasonably foreseeable." This good faith effort is missing, even though the effects actually are known and easily analyzed.

This DEIS fails to do so! **NEPA requirements are not being met.**

Section 1.5.3

Issues Eliminated from Detailed Analysis

The extent to which uranium energy production offsets the use of carbon-based fuels that contribute to the release of greenhouse gases (GHGs), which have been linked to global climate change.

This issue was incorrectly eliminated from detailed analysis. The proper analysis would be the *amount by which the uranium in the withdrawal area* offsets the use of carbon-based fuels that contribute to the release of greenhouse gases (GHGs), which have been linked to global climate change. In other words, the general amount that nuclear power reduces greenhouse gases is not germane to the EIS, but the GHG reduction due to the uranium in the withdrawal area is.

After all, the GHGs produced by uranium exploration and mining was minutely calculated and statements in this DEIS specifically commented on them, thus implying while the effect might be unknown, the fact that all these GHGs were being produced was important. Including the GHGs produced by uranium exploration and mining while excluding the GHG offsets is sneaky!

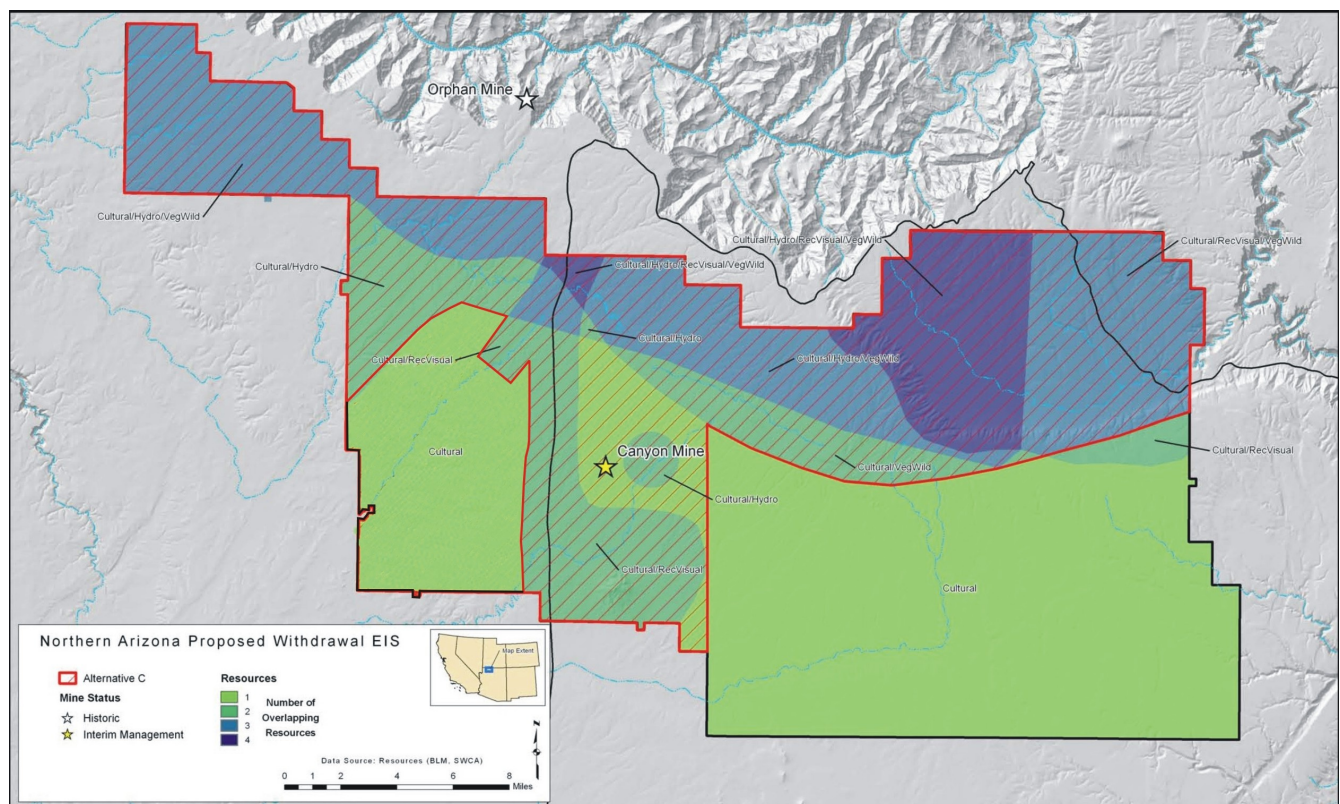
This is a BIAS in the development of this DEIS. Bias by omission.

I have comments that address this issue for Chapter 4. The cumulative GHG contribution by uranium exploration and mining is negligible compared to the sources already in existence in the Air Quality Study Area.

Chapter 2 Proposed Action and Alternatives

Page 2-16 and Figure 2.4-4

The Alternative C for the South Parcel is too restrictive. The area in the Southwest corner of the parcel has the same "values" as the area that is open East of Highway 64 and Red Butte. The area West of Hwy 64 that is only marked "Cultural" should be open for mineral entry under Alternative C. That this area is closer to Havasu Spring should have no bearing as the Water Resource section of this DEIS calculated no or negligible impacts at Havasu Springs from mining development. The Alternative C map should look like:



Alternative C is too restrictive for the South Parcel. Both of the areas in the above figure that are now indicated as open are equivalent. There is no reason to remove the West parcel as was done in the current Alternative C.

Page 2-33 to 2-45 Table 2.8.1

This table will need to be adjusted based on comments received and incorporated into the EIS. It is my opinion that based on my comments alone, substantial revisions will be required.