

Testimony of Russell D. Butcher,  
former Southwest Representative of  
National Parks Conservation Association  
to Subcommittee on National Parks, Forests and Public Lands,  
Committee on Natural Resources,  
US House of Representatives  
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My name is Russell D. Butcher. I reside in San Diego County, California. For more than 45 years, my career, which has focused on parkland and wildlife conservation and on environmental negotiating, has included serving on the staffs of such nonprofit advocacy organizations as the National Parks Conservation Association (NPCA), National Audubon Society, and Save-the-Redwoods League. From 1984-1990, I served as a member of the U.S. Bureau of Land Management's Arizona Strip District Advisory Council. And I have authored a number of books, most recently including guidebooks to the national park system and the national wildlife refuge system.

In the early 1980s, as the Pacific Southwest regional director for NPCA, I became concerned about alleged threats to the integrity of Grand Canyon National Park and the Colorado River from uranium mining activities near the park on the "Arizona Strip" -- a New Jersey-size area that extends northward from the canyon to the Utah state line.

Following a first-hand examination of mine sites in the Kanab Creek area being developed by the then active company, Energy Fuels Nuclear (EFN), I was convinced that these particular activities were extremely unlikely to pose any credible risk of environmental harm to either the park or the river. Two reasons stood out:

(1) Contrary to my preconception, development of these sites did not involve open-pit mining operations, as typically occurs in copper mining, for example. Instead, only a small footprint of surface disturbance, encompassing perhaps as much as 20 acres, was associated with accessing a subsurface, narrow, vertically aligned uranium ore-bearing geological structure known as a breccia pipe.

(2) EFN officials expressed an unqualified and emphatic commitment to raising the bar extremely high in terms of conducting their mineral extraction and post-mining reclamation activities in the most environmentally sensitive and exemplary manner possible. Judging by what I saw -- both on the ground and from the air, their words of reassurance were borne out by their actions. In short, there was no justification, in my opinion, for becoming alarmed over these relatively small-scale resource extraction activities on public lands administered by the U.S. Bureau of Land Management (BLM).

Late in the 1980s, I revisited the most active EFN site -- the Pigeon Mine. What I saw came as a pleasant surprise: Not only was the entrance to the mine itself completely sealed, but all visual evidence of the limited mine-related surface disturbances and the access road had been superbly well restored. In fact, I felt that if I were to bring someone who knew nothing about the former mining activities to the site, that person would logically assume that this was undisturbed wilderness. More than 20 years have since elapsed. By now I have to assume that the shrubby high-desert vegetation has continued to grow and thrive, making the area appear even more as if it had never been disturbed by man.

Now here we are at the start of the second decade of the 21<sup>st</sup> century, with alarm again being raised over the renewed commercial interest in extracting high-grade uranium on BLM and U.S. Forest Service lands adjacent to Grand Canyon National Park. This sense of alarm, I believe, is in large part based upon the sheer number of mineral claims – totaling approximately 5,000 -- that have been filed with the federal government.

It is important, however, to factor in the answer to what I believe is a relevant question: What percentage of those mineralized claims would ever likely prove to contain an economically viable deposit of uranium ore? The answer: Only a very small percentage -- roughly one out of every 35 claims for a total of perhaps 125 sites containing uranium of sufficient quality and quantity to merit a company's financial investment to extract the uranium ore. Add to this small percentage the fact that the footprint of surface disturbance is both on a small scale and capable of being easily reclaimed after the mining activity has ceased.

Regarding a risk of dissolved uranium contamination of underground waters caused by mining activity, it is worth noting a statement in a February 18, 2010, news release issued by the U.S. Geological Survey: "Analysis of historical water-quality data for more than 1,000 water samples from 428 sites in northern Arizona shows that dissolved uranium concentrations in areas without mining were generally similar to those with active or reclaimed mines."

To sum up my personal opinion regarding breccia pipe uranium mining on public lands surrounding Grand Canyon National Park, while such activities must be carried out with extreme care and due diligence, as was demonstrated by EFN in the late 20<sup>th</sup> century, I continue to view such activities as posing no credible threat of environmental harm to either Grand Canyon National Park or the Colorado River that flows through it. In the unlikely event that a particular mine proposal appears to pose a specific risk of degrading the quality of visitor experience or impairing the quality of waters or other natural resources within the park, every effort should then be made by the land-management agency, in close consultation and cooperation with the National Park Service, to avoid any such potentially harmful impacts.

Consequently, on the merits I can see no credible justification for a 1.1 million-acre withdrawal from mineral entry of lands to the north and south of the park. Furthermore, such a withdrawal from mineral entry directly contradicts the good-faith intentions and understandings of all the stakeholders who in 1983-84 met and successfully negotiated the designation of BLM and Forest Service wilderness areas on the Arizona Strip that were ultimately approved by Congress and signed into law. The wilderness study areas not placed in the National Wilderness Preservation System were released back into multiple use status, including the mining of uranium. As one of the persons who actively participated in that collaborative process, I can state unequivocally that we achieved the negotiated compromise on the basis of allowing such activities as mineral extraction to go forward under appropriate federal oversight on the released lands.

Respectfully submitted,

[Russ Butcher](#)

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