

Coloradoans Against Resource Destruction • Colorado Citizens Against Toxic Waste, Inc • Center for Native Ecosystems • Colorado Environmental Coalition • Colorado Wild • Dvorak Expeditions • Grand Valley Peace & Justice • Great Old Broads for Wilderness • Living Rivers and Colorado Riverkeeper • Natural Resources Defense Council • Nuclear Information and Resource Service • Paradox Valley Sustainability Association • Rocky Mountain Chapter of the Sierra Club • Sheep Mountain Alliance • Town of Ophir • Uncompahgre Sierra Club • Uncompahgre Valley Association • Uranium Watch • Western Colorado Congress Western Resource Advocates • Wild Connections • Wilderness Workshop • (plus attached list)

Mr. Steve Tarlton
Colorado Department of Public Health and Environment
HMWMD-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

January 5, 2011

Dear Mr. Tarlton,

Representing thousands of members in Colorado and the Mountain West, as well as organizations invested both in the protection of the environment in Colorado and of the Dolores River Corridor in southwest Colorado, we the undersigned ask that you deny the permitting of the Piñon Ridge Uranium Mill proposed by Energy Fuels Inc.

With its stunning red rock canyons, the Dolores River Corridor is the Grand Canyon of Colorado, revered by boaters, hikers, horsemen, birders and bikers alike. It provides important habitat for threatened Colorado River fish as well as river otter, bighorn sheep, deer, elk, black bear, ringtail cats, mountain lions, bobcats, bald eagles, golden eagles, and peregrine falcons, unique reptile species, amphibians, and rare and unusual plant species. The Dolores River is a valuable ecological treasure, worthy of protection for both its riparian and wildlife habitat and socioeconomic benefits to the surrounding communities.

The proposed Piñon Ridge Uranium Mill would be located just six miles above the Dolores River in the Paradox Valley of southwest Colorado. As you are aware, the site is located in the heart of the Uravan Mineral Belt, a large uranium deposit, which parallels the course of the Dolores. Development of the mill will cause increased mining of thousands of uranium claims on over 320,000 acres of land along the river, most of it public.

Analyses by independent hydrologists and geologists have concluded that the proposed mill site is hydrologically connected to the Dolores River and that there exists no significant geologic feature to naturally contain the proposed 40-acre radioactive tailings pile. If the

tailings pile were to leak, as all tailings piles inevitably do, the contamination would impact the immediate surrounding surface water, would likely travel to the Dolores via underlying groundwater sources and eventually to the Colorado River.

Indeed, recent independent inquiries into existing uranium claims along the Dolores River have revealed that many inactive and abandoned claims are already causing ongoing ground and surface water contamination, some of it flowing directly into the river. This water is critical to the ecological and agricultural values of the Paradox Valley and other rural communities along the river which would be further compromised by more uranium development.

The approval of this mill would likely lead to degradation of the environment, economy and health of the region. And as the developers of the mill recently told the state's major newspaper, uranium mined in the region and processed at the mill will likely be shipped abroad to Asia – leaving Colorado taxpayers and local residents to cope with problems that will certainly come from this new mill.

We do not believe that the short-term benefits of a uranium boom will outweigh the abundant agricultural and recreational economic opportunities in the Dolores River Canyon.

In the past the uranium industry has proved itself to be an unreliable engine of economic progress, vulnerable to the vicissitudes of the energy market and prone to boom and bust cycles that leave behind destitute communities saddled with an additional burden of environmental cleanup. The development of this mill and mining activity in the region will undermine the sustainable economic engines that have been increasing the quality of life in southwest Colorado since the last uranium boom of the 1970's.

The recent Gulf Oil Spill provides an illustration of the disastrous consequences when a corporate entity fails to analyze and prepare adequately for a “worst-case-scenario.” We ask that you deny this mill based on the lack of worst-case scenario analysis in its planning and the clear examples of the toxic, destructive legacy of the uranium industry in Colorado, which demonstrate that this industry is neither able nor willing to manage the impacts it leaves behind.

The uranium industry in Colorado has placed a huge financial burden on the taxpayers of Colorado and the United States. Close to \$1 billion has been spent on cleanup efforts in Colorado alone, but the radioactivity of these sites will be with us forever. The negative economic impacts of this mill would far outweigh its benefits.

As the regulatory authority for granting uranium mill permits in Colorado you have the authority to consider a broad range of factors in your decision. We ask that you weigh all of

the possible impacts from this mill in your consideration. It is the responsibility of the applicant, Energy Fuels to provide technically and scientifically sound evidence that this proposal will not harm the public health or the environment and to adequately plan for worst-case scenarios. From the independent analysis submitted and the lack of adequate information presented by the applicant, we feel that you have substantive cause for the denial of this proposal and ask that you do so.

In addition to clear grounds for denial based on the application and potential impacts, the present state of historical mining claims along the Dolores both emphasizes the inadequacy of regulation during the last uranium boom and highlights the fact that current legislation is neither strong enough, nor adequately enforced to deal with ongoing, let alone future impacts. Moving ahead with further projects like the Piñon Ridge Uranium Mill is not only imprudent, it is potentially destructive and should not be approved for the Paradox Valley.

We the undersigned groups representing over 1 million members ask that you deny the Piñon Ridge Uranium Mill based on its likely environmental and socio-economic impacts as well as the clear lack of adaptive management, contingency planning, and disaster mitigation strategies in its proposal.

Sincerely,

Jay Davis, Coordinating Committee Representative
Coloradoans Against Resource Destruction
Wellington, CO

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Additional Organizations:

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Over 5000 members

Linda Seeley, Terra Foundation
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representing 130 members

Jane Swanson,
San Luis Obispo Mothers for Peace
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We have a membership of approximately 50 and 3,000 financial supporters.

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