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Montrose County Board of Commissioners
61 South Townsend
Montrose, CO 81401

September 9th, 2009

Dear Montrose County Board of Commissioners:

First and foremost, Environment Colorado would like to thank the Montrose Board of County Commissioners for the opportunity to comment on the Piñon Ridge Uranium Mill Special Use Permit.

Environment Colorado is writing on behalf of our 600 members and activists in and around the Uravan mineral belt and our 50,000 members and activists across the state of Colorado.

We urge the Montrose County Board of Commissioners to deny the Piñon Ridge Uranium Mill Special Use Permit on the grounds that an industrial mill should not be cited in an agricultural district. Preserving Colorado's rural character and its working landscapes is of the utmost importance for economic sustainability, open space and habitat protection, and quality of life in our state.

Should the permit be approved, we strongly recommend that the Commission include all sixteen conditions recommended by the Montrose County Planning and Development Department presented in a report to the Commission dated July 1st, 2009. In particular, we feel provision #10 is critical to ensure that the Piñon Ridge Uranium Mill does not become a national dumping ground for mercury and other toxic and radioactive wastes. A proposal for a Grand Junction mercury waste dump has recently been summarily rejected by elected Colorado leaders including Gov. Bill Ritter and State Sen. Josh Penry.

Additionally, we strongly recommend that the Commission adopt all conditions recommended by the Colorado Division of Wildlife in its letter to the Commission dated August 15th, 2009.

The West is at a crossroads economically and culturally. Extractive industries once fueled boom and bust economic development on the West Slope, but times have changed. In Montrose County, Headwaters Economics found that service, retail and construction industries have far surpassed extractive industries as drivers for economic development. Mining's share of the Montrose County economy has continued to decline.ⁱ

The changing economic drivers for the West can mean that further investment in extractive industries could come at a cost to other sectors of the economy. This last July, the Sonoran Institute underscored this conflict in a case study of Mesa County, and outlined the potential opportunity costs that increased uranium mining would bring to the outdoor recreation and tourism industries.ⁱⁱ

Of particular concern for Environment Colorado are the unintended consequences that the Piñon Ridge Uranium Mill would bring to Colorado's West Slope. From 2003 to 2007, uranium claims on public lands alone jumped 239%, the vast majority of which are located in the Uravan mineral belt. Permitting a new

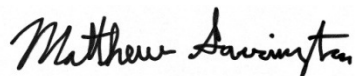
uranium mill would very likely mean increased development of those claims into active mines. Such development could mean severe and unacceptable impacts to the environment, public health, and local, sustainable economies without a comprehensive analysis completed and a thoughtful, comprehensive approach for how to move forward in place. Moreover, the most ecologically and economically valuable wild lands should be identified and conserved for multiple, sustainable uses such as camping, hunting, fishing, safeguarding watersheds, and wildlife habitat.

Uranium milling has a dangerous legacy in Colorado. Three uranium mills are currently listed Superfund sites, including the Denver Radium Site, the Cotter Mill, and the Uravan Uranium Project in Montrose County. The E.P.A. has reported that uranium milling operations can lead to increased risk of cancer and premature death for nearby residents and mill workers.ⁱⁱⁱ Recently, the spotlight has focused on past Uravan residents who are still struggling for economic and social justice after being exposed to and facing impacts from past uranium milling operations there.

The full social and environmental costs have been incredibly high in past Colorado uranium mill operations and uranium mining operations. We cannot afford to make the same mistakes in the future.

Again, we would like to thank the Commission for this opportunity to comment.

Very sincerely,



Matthew Garrington
Advocate
Environment Colorado

CC: Steve Carlton, Colorado Department of Public Health and Environment; Phil Egidi, Colorado Department of Public Health and Environment; Gov. Bill Ritter; Steve White, Montrose County Planning & Development

ⁱ Headwaters Economics. 13 February 2009. "A Socioeconomic Profile: Montrose County, Colorado." http://www.headwaterseconomics.org/profiles/p_Montrose_County_Colorado.pdf

ⁱⁱ Sonoran Institute. July 2009. *Uranium Mining, Tourism and Outdoor Recreation in Gateway, Colorado*. http://www.sonoraninstitute.org/index.php?option=com_docman&task=doc_download&Itemid=177&gid=692

ⁱⁱⁱ United States Environmental Protection Agency. 2008. *Technologically enhanced naturally occurring radioactive materials from uranium mining*, Volume 2, (Appendix 4: risks associated with conventional uranium milling, p. 7). <http://www.epa.gov/rpdweb00/docs/tenorm/402-r-08-005-voliii/402-r-08-005-v2-appiv.pdf>