

AZ/Utah Local Economic Coalition

2001 College Drive, #90, Lake Havasu City, AZ 86403
Phone: 928-453-0724 / Fax: 928-453-0717

Members: February 6, 2012

Garfield County. UT
Kane COUnty. UT
MOhave County, AZ
San Juan County. UT
Washington COUnty.
UT
Town of Fredonia. AZ

Hon. Kenneth Salazar
Secretary of Interior
Department of Interior
1849 C Street NW
Washington, DC 20240

Fax. 202-208-5048

Scott Florence

District BLM Manager, Arizona Strip District
345 East Riverside Drive
St. George, Utah 84790-6714

Fax. 435-688-3258

Mike Williams

Supervisor, Kaibab National Forest
800 South Sixth Street
Williams, Arizona 86046

Fax 928-635-8208

Ray Suazo

State BLM Director

One North Central Avenue, Suite 800
Phoenix, Arizona 85004-4427

Fax. 602-417-9398

Juan Palma

State BLM Director

PO Box 45155

Salt Lake City, Utah 84101

Fax. 801-539-4237

Sent by land mail and facsimile

Office of Chief Information Officer

Attention: Information Quality Correction Request Processing
United States Department of Interior
Mail Stop MIB-7447
1849 C. Street, NW
Washington, DC 20240

REQUEST FOR VERIFICATION OF QUALITY OF DATA AND INFORMATION DISSEMINATED IN THE FINAL ENVIRONMENTAL IMPACT STATEMENT RELATED TO WITHDRAWAL OF LAND FROM MULTIPLE USE IN NORTHERN ARIZONA RELATED TO WITHDRAWAL OF LAND FOR PURPOSES OF ALLOWING FILING AND PERFECTION OF URANIUM MINING CLAIMS.

This request and demand is made pursuant to the Data Quality Act (or Information Quality Act as it is known by some agency personnel) by which Congress ordered the Office of Management of Budget to require that every federal agency prepare a process for **verifying** the quality of data at the request of a local government or citizen.

This request is made as a precursory step toward requesting that data be corrected because of flawed processing that has allowed an EIS to be based on data and information that does not meet the standards of quality required by the Guidelines issued by the Office of Management of the Budget and the Department of Interior itself.

The request therefore is sent also to the Office of chief information officer of the Department of Interior because the request for correction will be sent to that office.

Both the Interior Department and the Bureau of Land Management have such procedures and have a data quality officer. District Manager Florence is requested to please submit this request to that officer at once to speed up this process. The Department of Agriculture and the Forest Service also have such procedures and have data quality officers. So, Supervisor Williams is requested to submit this request to the Forest's data quality officer to speed the process.

Previously, the members of the Coalition made a formal request for Data Quality verification to each of the addressees of this demand, and no formal response was ever made. The failure to respond to the prior demand constituted a violation of the Interior and Agriculture Guidelines and the OMB Guidelines that require the Departments to comply with the law.

That earlier demand related to a verification of data prior to issuance of the Final Environmental Impact Statement. The EIS has now been issued, and there still has been no response to verification requests.

The data/information as to which we request verification includes, but is not limited to, the following:

Amount of viable uranium in the Arizona Strip

As to all data and information regarding the amount of viable uranium in the Arizona Strip, each and every effort made at verification of reliability and accuracy. Comments filed by members of the Coalition and by companies affected by the EIS have made it pointedly clear that the data/information disseminated by the Department in the EIS is fatally flawed; the Department did not conduct a valid inventory of viable uranium, and thus completely understated the economic impact of withdrawing land from mining claims. The methodology used by the Department is flawed and not based on valid economic or scientifically acceptable standards.

The members insist that the Department state what effort was made to **verify** the data and information with economic development departments of the local governments serving the people affected by the meaning of the data and information, and what effort was made to **verify** the data and information according to acceptable market analysis techniques.

The Department received specific comments as to the flawed analysis; the members insist on being advised as to any comparative review that was made in the market, and by whom. If peer reviewed, who conducted the peer review, using what standards.

Economic loss to the communities:

The same information as to the economic loss, jobs, revenue, dollar impact resulting from loss of the Arizona Strip to mining

The Arizona Utah Local Economic Coalition makes this formal demand and request for the Regulatory Flexibility Act analysis that should have been conducted regarding the proposed withdrawal of land in Northern Arizona from multiple use including mining and filing and perfection of claims for uranium mining.

The evidence presented at the public hearing conducted by the Coalition showed stark economic impacts on small government entities and on small businesses throughout the member counties and towns of the Coalition. The Regulatory Flexibility Act requires that an economic analysis be conducted as to such impacts on small entities of government and business.

Please submit the regulatory flexibility analysis to the co-chairs of the Coalition and they will transmit the analysis to members. Please submit the analysis to the following:

Commissioner Alan Gardner
Washington County
197 East Tabernacle Street
St. George, Utah 84770

Supervisor Buster Johnson
Mojave County
P.O. Box 7000
Kingman, Arizona 86402-7000

Cordially,


Commissioner Alan Gardner


Supervisor Buster Johnson

AZ/Utah Local Economic Coalition

2001 College Drive, #90, Lake Havasu City, AZ 86403
Phone: 928-453-0724 / Fax: 928-453-0717

Members:

Garfield County, UT
Kane County, UT
Mohave County, AZ
San Juan County, UT
Washington County, UT
Town of Fredonia, AZ

February 6, 2012

Hon. Kenneth Salazar
Secretary of Interior
Department of Interior
1849 C Street NW
Washington, DC 20240

Fax 202-208-5048

Scott Florence

District BLM Manager, Arizona Strip District
345 East Riverside Drive
St. George, Utah 84790-6714

Fax 435-688-3258

Mike Williams

Supervisor, Kaibab National Forest
800 South Sixth Street
Williams, Arizona 86046

928-635-8208

Ray Suazo

State BLM Director

One North Central Avenue, Suite 800
Phoenix, Arizona 85004-4427

Fax 602-417-9398

Juan Palma

State BLM Director

PO Box 45155

Salt Lake City, Utah 84101

Fax 801-539-4237

Sent by land mail and facsimile

Mr. Secretary, Directors, Mr. Florence and Mr. Williams:

The social impact on communities

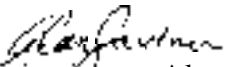
The same information as to the social impact on the local governments affected by the withdrawal

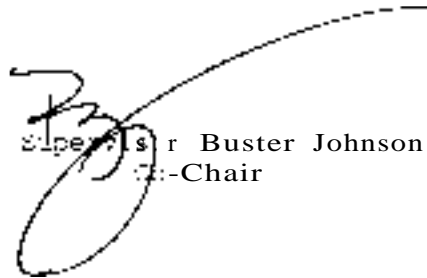
The Economic Impact on local governments.

Explanation of how and why the contractor did not recognize that elimination of processing new mining claims would affect the revenue of local governments (We know that the contractor did not know that there was any source of tax revenue to local governments that would be affected because he made the statement at a public meeting that since the mining was on federal land, there would be no tax revenue to local governments, so we are asking for the source of verification of the accuracy of that statement, and verification of the qualifications of the contractor)

Response to the request can be submitted to the co-chairs of the Coalition and they will transmit the information to the members.

Cordially,


Commissioner Alan Gardner
Co-Chair


Superintendent Buster Johnson
Co-Chair

AZ/Utah Local Economic Coalition

2001 College Drive, #90, Lake Havasu City, AZ 86403
Phone: 928-453-0724 / Fax: 928-453-0717

Members: February 6, 2012

Garfield County, UT
Kane County, UT
Mohave County, AZ
San Juan County, UT
Washington County,
UT
Town of Fredonia, AZ

Hon. Kenneth Salazar
Secretary of Interior
Department of Interior
1849 C Street NW
Washington, DC 20240

Fax 202-208-5048

Scott Florence
District BLM Manager, Arizona Strip District
345 East Riverside Drive
St. George, Utah 84790-6714

Fax 435-688-3258

Mike Williams
Supervisor, Kaibab National Forest
800 South Sixth Street
Williams, Arizona 86046

Fax 928-635-8208

Ray Suazo
State BLM Director
One North Central Avenue, Suite 800
Phoenix, Arizona 85004-4427
Fax 602-417-9398

Juan Palma
State BLM Director
PO Box 45155
Salt Lake City, Utah 84101

Fax 801-539-4237

Sent by land mail and facsimile

Office of Chief Information Officer
Attention: Information Quality Correction Request Processing
United States Department of Interior
Mail Stop MIB-7447
1849 C. Street, NW
Washington, DC 20240

REQUEST FOR VERIFICATION OF QUALITY OF DATA AND INFORMATION DISSEMINATED IN THE FINAL ENVIRONMENTAL IMPACT STATEMENT RELATED TO WITHDRAWAL OF LAND FROM MULTIPLE USE IN NORTHERN ARIZONA RELATED TO WITHDRAWAL OF LAND FOR PURPOSES OF ALLOWING FILING AND PERFECTION OF URANIUM MINING CLAIMS.

This request and demand is made pursuant to the Data Quality Act (or Information Quality Act as it is known by some agency personnel) by which Congress ordered the Office of Management of Budget to require that every federal agency prepare a process for verifying the quality of data at the request of a local government or citizen.

This request is made as a precursory step toward requesting that data be corrected because of flawed processing that has allowed an EIS to be based on data and information that does not meet the standards of quality required by the Guidelines issued by the Office of Management of the Budget and the Department of Interior itself.

* The request therefore is sent also to the Office of chief information officer of the Department of Interior because the request for correction will be sent to that office.

Both the Interior Department and the Bureau of Land Management have such procedures and have a data quality officer. District Manager Florence is requested to please submit this request to that officer at once to speed up this process. The Department of Agriculture and the Forest Service also have such procedures and have data quality officers. So, Supervisor Williams is requested to submit this request to the Forest's data quality officer to speed the process.

Previously, the members of the Coalition made a formal request for Data Quality verification to each of the addressees of this demand, and no formal response was ever made. The failure to respond to the prior demand constituted a violation of the Interior and Agriculture Guidelines and the OMB Guidelines that require the Departments to comply with the law.

That earlier demand related to a verification of data prior to issuance of the Final Environmental Impact Statement. The EIS has now been issued, and there still has been no response to verification requests.

The data/information as to which we request verification includes, but is not limited to, the following:

Amount of viable uranium in the Arizona Strip

As to all data and information regarding the amount of viable uranium in the Arizona Strip, each and every effort made at verification of reliability and accuracy. Comments filed by members of the Coalition and by companies affected by the EIS have made it pointedly clear that the data/information disseminated by the Department in the EIS is fatally flawed; the Department did not conduct a valid inventory of viable uranium, and thus completely understated the economic impact of withdrawing land from mining claims. The methodology used by the Department is flawed and not based on valid economic or scientifically acceptable standards.

The members insist that the Department state what effort was made to verify the data and information with economic development departments of the local governments serving the people affected by the meaning of the data and information, and what effort was made to verify the data and information according to acceptable market analysis techniques.

The Department received specific comments as to the flawed analysis; the members insist on being advised as to any comparative review that was made in the market, and by whom. If peer reviewed, who conducted the peer review, using what standards.

Economic loss to the communities:

The same information as to the economic loss, jobs, revenue, dollar impact resulting from loss of the Arizona Strip to mining

The Arizona Utah Local Economic Coalition makes this formal demand and request for the Regulatory Flexibility Act analysis that should have been conducted regarding the proposed withdrawal of land in Northern Arizona from multiple use including mining and filing and perfection of claims for uranium mining.

The evidence presented at the public hearing conducted by the Coalition showed stark economic impacts on small government entities and on small businesses throughout the member counties and towns of the Coalition. The Regulatory Flexibility Act requires that an economic analysis be conducted as to such impacts on small entities of government and business.

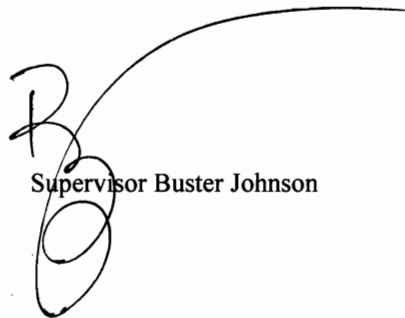
Please submit the regulatory flexibility analysis to the co-chairs of the Coalition and they will transmit the analysis to members. Please submit the analysis to the following:

Commissioner Alan Gardner
Washington County
197 East Tabernacle Street
St. George, Utah 84770

Supervisor Buster Johnson
Mojave County
P.O. Box 7000
Kingman, Arizona 86402-7000

Cordially,


Commissioner Alan Gardner


Supervisor Buster Johnson

AZ/Utah Local Economic Coalition

2001 College Drive, #90, Lake Havasu City, AZ 86403
Phone: 928-453-0724 / Fax: 928-453-0717

Members:

February 6, 2012

Garfield County, UT
Kane County, UT
Mohave County, AZ
San Juan County, UT
Washington County,
UT
Town of Fredonia, AZ

**Hon. Kenneth Salazar
Secretary of Interior
Department of Interior
1849 C Street NW
Washington, DC 20240**

Fax 202-208-5048

**Scott Florence
District BLM Manager, Arizona Strip District
345 East Riverside Drive
St. George, Utah 84790-6714**

Fax 435-688-3258

**Mike Williams
Supervisor, Kaibab National Forest
800 South Sixth Street
Williams, Arizona 86046**

928-635-8208

**Ray Suazo
State BLM Director
One North Central Avenue, Suite 800
Phoenix, Arizona 85004-4427**

Fax 602-417-9398

**Juan Palma
State BLM Director
PO Box 45155
Salt Lake City, Utah 84101**

Fax 801-539-4237

Sent by land mail and facsimile

Mr. Secretary, Directors, Mr. Florence and Mr. Williams:

The social impact on communities

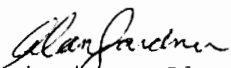
The same information as to the social impact on the local governments affected by the withdrawal

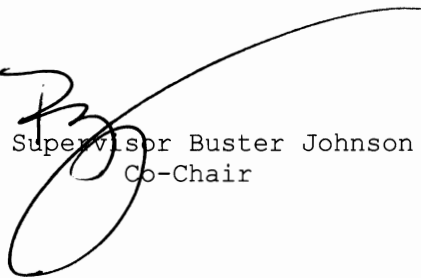
The Economic Impact on local governments.

Explanation of how and why the contractor did not recognize that elimination of processing new mining claims would affect the revenue of local governments (We know that the contractor did not know that there was any source of tax revenue to local governments that would be affected because he made the statement at a public meeting that since the mining was on federal land, there would be no tax revenue to local governments, so we are asking for the source of verification of the accuracy of that statement, and verification of the qualifications of the contractor)

Response to the request can be submitted to the co-chairs of the Coalition and they will transmit the information to the members.

Cordially,


Commissioner Alan Gardner
Co-Chair


Supervisor Buster Johnson
Co-Chair