



# STATE OF UTAH

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February 15, 2005

Mr. Don Metzler  
Moab Federal Project Office  
U.S. Department of Energy  
2597 B ¾ Road  
Grand Junction, Colorado 81503

Dear Mr. Metzler,

**RE: Moab Uranium Mill Tailings, Draft Environmental Impact Statement,  
DOE/EIS-0355D, State of Utah Comments**

Thank you for the opportunity to provide comments on a significant project for the State of Utah, remediation of the Moab Uranium Millsite and Tailings Pile. I urge the U.S. Department of Energy (DOE) to remove the Moab Mill Tailings Pile from the banks of the Colorado River, transport the tailings to a repository to be constructed at Klondike Flats, clean up the remainder of the Millsite, and treat groundwater contamination at the site for the period necessary to ensure that contamination does not migrate offsite through groundwater or into the Colorado River in violation of Utah surface and groundwater quality standards. This work should be commenced immediately, and federal funding should be sought to complete the work as promptly as possible. Now is the time to act – to move the Tailings Pile.

The State of Utah appreciates DOE's work in preparation of the Draft Environmental Impact Statement (DEIS), as well as the ongoing work to minimize contamination from moving off the Millsite. However, it is clear that the Tailings Pile cannot be left in the floodplain of the Colorado River. Recent studies by the U.S. Geological Survey and the University of Utah, as well as the reviews by the Utah Department of Environmental Quality, document that the river has migrated historically within the floodplain and over geologic time and that the force of the river at both a maximum flood event and even a 100-year event will generate forces sufficient to erode the adjacent banks of the river and undercut the tailings pile. The National Academy of Sciences Committee also recognized the critical importance of that risk when it reviewed remediation plans for the site. Recent flooding in the St. George and Santa Clara regions

of Utah also demonstrated the swift and immense force of moving water in the desert. We cannot afford to assume the risks associated with having uranium tailings strewn along river banks and bars of the Colorado River below Moab. Good science and good sense tell us the tailings must be moved.

Furthermore, moving the uranium tailings to a constructed repository at Klondike Flats creates the smallest impact and the most reasonable expenditure of funds to solve the problem. The repository site at Klondike Flats has broad support from federal, state, and local agencies, and from local residents. Transportation along the existing rail line reduces transportation impacts. Removing the tailings from the banks of the Colorado River would eliminate the risk of river undercutting, remove the source of groundwater contamination, and reduce the time needed for treatment of contamination at the river's edge.

Additional, detailed comments on the DEIS will be submitted by the Utah Department of Environmental Quality on behalf of the State. We look forward to working with you to initiate the removal of the last of the uranium mill tailings piles on the banks of the Colorado River. Thank you for your consideration of this essential work.

Sincerely,



Jon M. Huntsman, Jr.  
Governor