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Uranium Development in the San Juan Basin Region

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2nd
~~ROUGH~~ DRAFT

COMMENTS

to the Draft Report on Environmental Issues
Uranium Development in the San Juan Basin Region
of the San Juan Basin Regional Uranium Study.

Albuquerque, New ~~MEX~~ Mexico

January 8, 1980

by Americans for Indian Opportunity
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We are pleased to see a major effort being undertaken by a federal agency to comprehensively study the environmental and human health impacts of current and proposed uranium development in the San Juan Basin Region. As the uranium industry spreads across the region, single case-by-case environmental assessments are no longer valid in determining the desirability of individual projects.

This document, however, is totally inadequate as a tool for assessing the region-wide impact of uranium development on the natural environment and human inhabitants of the area. It reaches conclusions about impacts that are simply not supported by the data presented. The overall tone of its summary sections are that the health and environmental impacts are negligible and acceptable. However, later in the narrative sections it states that the information needed to make impact assessments is either totally lacking or inadequate.

Take this one example. In Chapter IV, which discusses the impacts on air quality, on page IV-3 the summary states that "it is estimated that the radon emissions associated with uranium development at the Moderate projection level might produce an increase in lung cancer risk within the San Juan Basin of approximately one percent by 2000. ... The possible increase in lung cancer of approximately 5 to 7 cases in the year 2000, which the range of 1 to 1.5 percent increased risk would entail, would leave the uranium

belt population still below the national average for lung cancer incidence and would not be detectable from a statistical standpoint." Sounds sublime!

But 14 pages later, on p. IV-17, the report admits that "Information on radon emissions from specific sources and on long-term average concentrations in the San Juan Basin is inadequate for performing a quantitative assessment of potential health impacts."

Again, on p. IV-47, the report states that, "Since data for the San Juan Basin are meager at best and in some areas completely lacking, it was impossible to evaluate risk [of lung cancer] with a high degree of accuracy." But the study team doesn't hesitate to set up hypothetical models and assure us with calculations of low cancer risk. "These initial calculations," they state, "indicate that the potential health impact of uranium development on the general population of the San Juan Basin would be quite small." (from p. IV-54.) They make no allowance for the fact that most radiation caused cancers don't show up for 20 to 30 years, and that the worst outbreak of lung cancer might erupt around the year 2020, well beyond the dates of their study.

Such statements about benign impact based on nonexistent data are misleading and deceptive, and seem to be intended to be that way by the study team.

The document glosses over almost all areas of potentially adverse impact, and always manages to weasel out of obvious

negative consequences by stating that these events would probably occur anyway because of population growth and development centering around other industries in the region, or that sufficient planning or further research will minimize the negative effects of increased uranium development. It's like saying, "The air's going to get bad anyway, so may as well make it a little worse by mining and milling uranium." (see p. IV-27, top paragraph).

One important area that is dealt with much too superficially is in Chapter VII, "Impacts on the Sociocultural Landscape." The effects of boomtowns on persons, families and communities are seriously underestimated. Mental health, happy families and peaceful communities are resources that are not reclaimable once they have been destroyed by this kind of rapid growth.

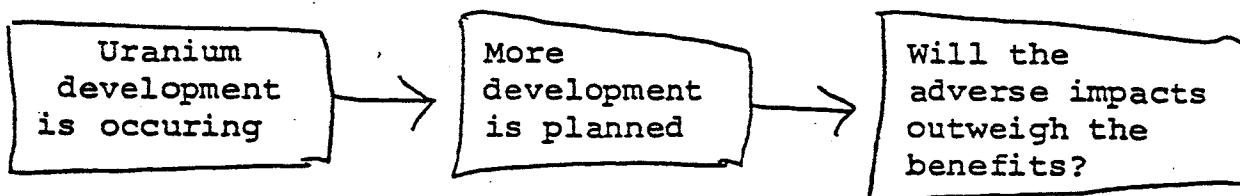
Boomtowns also tend to overload all community & service systems such as health care, sewage treatment, street paving and law enforcement, and thus create secondary environmental impacts. When something like a sewage treatment facility gets overloaded and they start dumping raw sewage into rivers and streams, the health and environment of local and downstream ~~pe~~ people is additionally impacted, even though they aren't located right next to the uranium mine or mill.

A major flaw of this report is its assumption that uranium development is inevitable and is the best option for use of the

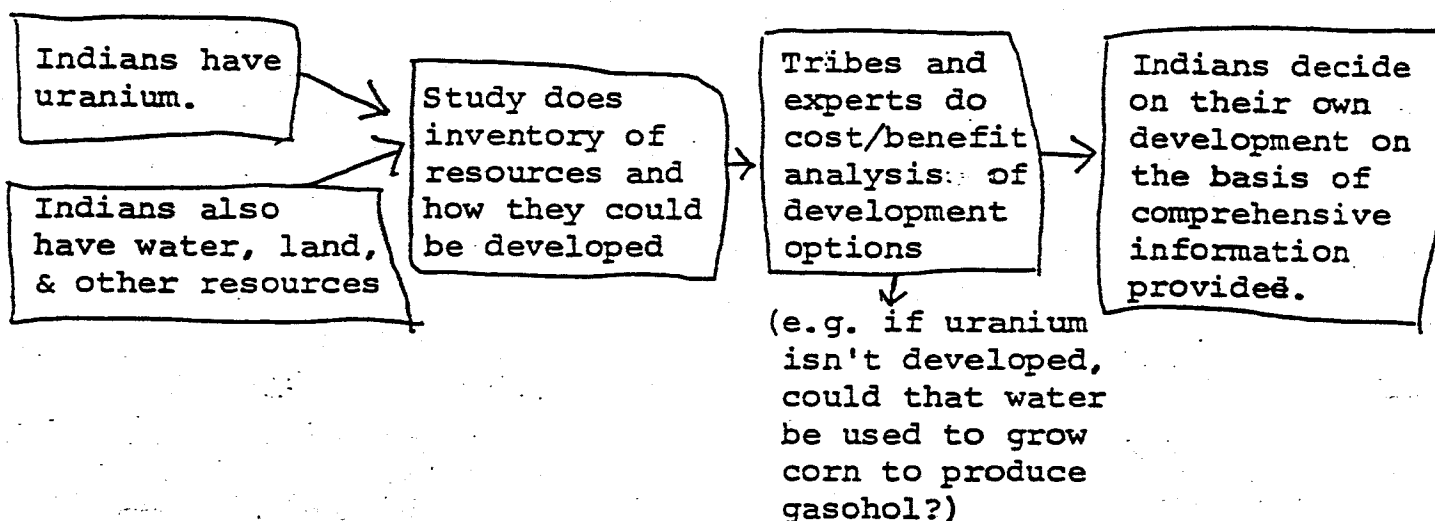
Indian and Hispanic land in the Grants Mineral Belt. The report promotes uranium development without exploring other options for development of that land. The ultimate decision regarding use of the land belongs to the Indians and other landowners. The purpose of a BIA study should be to explore a whole range of viable options for development of Indian land and do a cost/benefit analysis for each use, possibly finding several uses which are compatible, and then let the tribes decide how they want to develop their land.

The problem with pursuing uranium development on this scale is that it is essentially a one-time use of the land. What will happen to the region after the uranium companies are through with it? Groundwater will be depleted to a level of three or four thousand feet, aquifers will be disrupted and contaminated, the air and surface water will be polluted with radioactivity and heavy metals, the land surface will be ~~severely~~ scarred and pockmarked with tailings piles that require safeguarding for thousands of years, and the boomtowns will have become ghost towns housing only the tailings pile guards. ~~(or, ghost towns with few jobs for anyone.)~~ Surely, with a little planning, we can devise a better scenario for the year 2020.

To summarize the major flaw of this report, we can diagram its assumption ~~is~~ like this:



From our point of view, the study method should look like this:



Another serious problem that we see with this report is its failure to analyze the cumulative impacts of the entire uranium production program. For one thing, the effects of exposure to radioactivity are cumulative--the more you get, even in small doses, the greater is your risk of cancer. Various chapters provide brief explanations of the hazards of Radon-222 in the air, of radioactivity in surface water and ground water, of inter-aquifer contamination (which they admit is not well understood, p. V-46), and of the possibility of concentration of radionuclides as they move up the sheep-to-human food chain. (on which, again, there is

no data, p. IV-37). But they never bring all of these concerns together into one analysis. And they don't even consider such additional environmental health hazards as the introduction of heavy metals ^(such as lead and arsenic) and "trace minerals," ^(such as selenium, chromium and vanadium) ~~such as lead, and arsenic,~~ ^{and selenium,} into the environment through the mining and milling process, ^{Other issues which need attention are} ~~or~~ the problem of increased hazard on the highways due to increased ~~truck~~ truck traffic, ^{and the fact that there are no plans or federal requirements} for reclamation of uranium mined lands;

An even greater need exists for a comprehensive study of the cumulative impacts of all proposed development in the San Juan Basin--uranium, coal, oil, gas, power generation, irrigation, and railway construction. These cannot be seen as isolated developments, for they are all occurring in close proximity and their ~~ix~~ environmental health impacts may well be compounded geometrically rather than simply added to each other arithmetically. It is our hope that similar funding as was used for this regional uranium study can be found to conduct an even broader ~~ix~~ study of the impacts of all ~~ix~~ development in the San Juan Basin.

An example of such a holistic study which we recommend for your reading is the report of the Science and Public Policy Program of the University of Oklahoma on Energy from the West, produced by Michael D. Devine for the Office of Research and Development of the U.S. Environmental Protection Agency. Copies of these reports are available for viewing at our office.