



# good energy collective

April 24, 2022

Council on Environmental Quality  
730 Jackson Place NW  
Washington, DC 20503

**Subject:** Good Energy Collective's Response to the Council on Environmental Quality Request for Information on the Climate and Economic Justice Screening Tool Beta Version

Dear Ms. Mallory:

Good Energy Collective (GEC) is pleased to submit a response to the Council on Environmental Quality (CEQ) on its Request for Information on the beta version of the Climate and Economic Justice Screening Tool.

This geospatial screening tool will be a helpful resource to the federal government and to the public and private sectors in identifying communities that are underserved or overburdened with pollution. With this tool, project developers and grantors will be able to make better-informed decisions about whether, where, and how to site and conduct engagement for projects and services to promote more equitable health and environmental outcomes.

Below, we provide a response to the questions regarding datasets indicated in the Request for Information, with recommendations that will support the enhancement of the screening tool and ensure it is reflecting all communities disadvantaged by disproportionate pollution throughout the country.

## **Datasets**

### **1. What recommendations for additional datasets would enhance and improve upon the set of indicators currently used in the Climate and Economic Justice Screening Tool? In your comments, please include why**

-----  
*About Good Energy Collective: GEC is a progressive policy research organization focused on building the progressive case for nuclear energy as an essential part of the broader climate change agenda. GEC works with industry, the administration, Congress, and NGOs across the political spectrum to help shape the future of advanced nuclear technologies to contribute toward an environmentally just climate response.*

## **and how the data recommendations would improve upon the current set of data and/or indicators used in the tool.**

GEC recommends that CEQ consider incorporating several additional datasets into the Climate and Economic Justice Screening Tool in order to ensure that the tool does not exclude communities that face significant localized and climate pollution stemming from the presence of abandoned mines in their census tract.

Many of these abandoned mines are already sources, or potential sources, of environmental degradation and health risk that in many instances stems from both industrial and federal derelictions of duty in the protection of workers and their communities from the contamination of local air, water, and land. Some of these mines, such as uranium mines, have plagued communities with health problems and an increased risk of premature death for decades, without remediation. As brownfields, abandoned mine lands often further disadvantage communities by reducing property values and discouraging new economic development.

### **Recommendation: Incorporate into the screening tool the U.S. Environmental Protection Agency's Uranium Location Database**

Unremediated uranium mines continue to expose surrounding communities to radiological and heavy metal air and water contamination. The U.S. government directly supported uranium extraction from many of these mines beginning during World War II, most of which are on Tribal and federal lands.<sup>1</sup> The mines are concentrated in the Four Corners region of the continental United States, disproportionately impacting Indigenous communities. Despite federal officials' awareness that the unprotected handling and disposal of uranium and its tailings could cause severe health and environmental damage, officials failed for decades to set adequate worker protection standards; Congress took until 1978 to enact the Uranium Mill Tailings Radiation Control Act, which called on the U.S. Environmental Protection Agency (EPA) to set standards at active and inactive mill tailings locations. Affected communities are still waiting for support in cleaning up hundreds of these abandoned mines.

#### **Specifics**

- Agency: EPA
- Data Title: Uranium Location Database Compilation
- URL: <https://www.epa.gov/sites/default/files/2015-05/documents/402-r-05-009.pdf>
- Intended measure: Proximity to hazardous former uranium mining sites (can nest within the "Reduction and remediation of legacy pollution" indicator)
- Scope: The database reflects the efforts of the EPA, several additional federal agencies and several state and tribal governments to map the locations of active, inactive, productive, and unproductive U.S. uranium mines. These mines are predominantly located in five U.S. states "and are typically on federal and Tribal lands," and the

---

<sup>1</sup> U.S. Environmental Protection Agency, "Uranium Location Database Compilation," EPA 402-R-05-009, August 2006, <https://www.epa.gov/sites/default/files/2015-05/documents/402-r-05-009.pdf>, 1.

database reflects this fact. Some uranium mining has occurred in eastern U.S. states, too.<sup>2</sup> This database is the most comprehensive effort to map U.S. uranium mines of which GEC is currently aware, but it does not indicate the current reclamation status of the c. 15,000 uranium mines identified.<sup>3</sup>

- Data Quality: As the database documentation indicates, the EPA made an effort to increase the reliability of the data in the database by identifying documentation and processing data for all data sources used in creating the database. The agency also worked to reduce duplicative mine identification by using U.S. Geological Survey maps. More information about the specific data sources used and their accuracy and completeness is provided in the database compilation document.<sup>4</sup>
- Resolution: The database should be available as a master database and composite shapefile from the EPA.

To GEC's knowledge, the sole undertaking of this comprehensive uranium mine mapping effort occurred more than a decade ago in 2006. GEC encourages CEQ to engage with the EPA to identify whether any of either the EPA regional offices, state agencies, and other federal agencies and Tribal governments indicated in the database have since modified, updated, or improved their uranium mine location data.

### **Recommendation: Utilize EPA's Collection of Tables Related to AML Sites and Programs to identify abandoned mine locations for inclusion in the screening tool**

Abandoned mine lands pose a range of detriments to local communities, from overt environmental hazards and climate-warming emissions to blights that hinder new local economic development. GEC recommends that CEQ further consider reflecting the presence of abandoned mine lands within census tracts as an indicator of disadvantage.

#### **Specifics**

- Agency: U.S. Environmental Protection Agency (EPA)
- Data Title: Collection of Tables Related to AML Sites and Programs
- URL: <https://semspub.epa.gov/work/HQ/176049.pdf>
- Intended measure: Proximity to former mining sites (can nest within the "Reduction and remediation of legacy pollution" indicator)
- Scope: Identifies states with abandoned mine land databases and studies conducted by states to identify the location of abandoned mines. Further identifies abandoned mine land inventories from a nonprofit and the Bureau of Land Management, as well as information about reclamation at abandoned mines managed by the National Park Service and Forest Service. The document identifies abandoned mine land locational resources for about two-fifths of U.S. states. GEC suggests that CEQ engage with the EPA to identify whether it is now engaged with or tracking additional resources from the states both represented and unrepresented in the document.

---

<sup>2</sup> Ibid., 4.

<sup>3</sup> Ibid., 1.

<sup>4</sup> Ibid., 7-19.

- Data Quality: GEC recommends this list with the caveat that many of the links to the state databases on this list are broken. However, this list could be a helpful starting point to identify states with databases and to identify state level studies that have been conducted to locate abandoned mines.
- Resolution: Varies by database.

### **Recommendation: Incorporate the following state-level mine land datasets into the CEQ climate and economic justice screening tool**

Many states maintain comprehensive mapped datasets of the locations of mines within their borders. While the presence of a mine is not uniformly indicative of a disadvantaged community, GEC believes that these resources offer an important starting point to identify, and then reflect in the screening tool, the breadth of legacy pollution across the country; for instance, some of the mapping efforts listed below include specific data related to the presence or potential of air and water pollution stemming from the mine.

GEC iterates that it encourages CEQ to engage with the EPA to identify any additional or alternative state, Tribal, and federal resources that identify mines that meet whatever threshold CEQ may ultimately choose to define for legacy pollution as it relates to mines.

#### **State-level resources**

- Colorado Division of Reclamation Mining and Safety's AUGER Map (<https://maps.dnrgis.state.co.us/drms/Index.html?viewer=drms>)
  - Provides information on active and historic mines in Colorado, with information on permitting, size, commodities, fees, land use, coal permit boundaries, alluvial and bedrock aquifers, geology, hydrography, and land cover.
- The Directory of Active Mines in Arizona (<http://repository.azgs.az.gov/about>)
  - Indicates the location of active uranium mines in Arizona and could assist in narrowing down the location of groundwater, surface water, and air pollution in nearby communities and help to locate inactive uranium mines that may be close in proximity.
- The New Mexico Bureau of Geology and Natural Resources Interactive Map of Geological Resources (<https://maps.nmt.edu/>)
  - Shows the location of mineral resources in the state of New Mexico, including uranium deposits, uranium mills, and uranium mining districts.
- The Utah Geospatial Resource Center Dataset (<https://gis.utah.gov/data/energy/uranium/>)
  - Includes interactive maps, as well as downloadable geodatabase files, with maps of permitted uranium mines, uranium mills, past uranium producers, uranium boundary areas, and uranium districts.
- The California Department of Conservation, Division of Mine Reclamation Mine Locator Database (<https://maps.conservation.ca.gov/mol/index.html>)
  - Shows uranium mine locations throughout the state of California, fault activity, geological data, and mineral classifications.

- The California Abandoned Mines Dataset ([https://www.conservation.ca.gov/dmr/abandoned\\_mine\\_lands/pamp](https://www.conservation.ca.gov/dmr/abandoned_mine_lands/pamp))
  - Provides the Principal Areas of Mine Pollution (PAMP) dataset, a compilation of 2,422 mining operations and their potential water-quality problems.

### Specifics

- Intended measure: Proximity to mining sites (can nest within the “Reduction and remediation of legacy pollution” indicator).
- Scope: These state-level datasets show the locations of active, abandoned, and historical mine sites in a few of the most highly mined states in the United States. These datasets could support the early identification of potentially hazardous mine sites in Colorado, Arizona, New Mexico, Utah, and California, which have a large number of historical mining claims and where legacy mine pollution continues to pose hazards to air and water quality.
- Data Quality: The datasets listed above appear to include complete, accurate, and reliable information based on state records of mine permit holders and geological data. However, GEC makes no warranty to the consistency of updates to the datasets.
- Resolution: State-level datasets are variously organized by geological data, counties, and permit holders.

Thank you again for the opportunity to provide input toward the Climate and Economic Justice Screening Tool Beta Version. We stand with CEQ in its commitment to develop the resources necessary to inform decision-making that results in equitable outcomes for U.S. communities; protects the overburdened; and prioritizes assistance and support for the underserved. Please do not hesitate to reach out to us with any questions or requests for clarification.

Sincerely,



Ariel Gould  
Environmental Justice Policy Counsel  
Good Energy Collective  
[ariel@goodenergycollective.org](mailto:ariel@goodenergycollective.org)



Jackie Toth  
Deputy Director  
Good Energy Collective  
[jackie@goodenergycollective.org](mailto:jackie@goodenergycollective.org)