



The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

October 22, 2010

Ms. Kristin Yannone, Project Manager
Bureau of Land Management, Lander Field Office
PO Box 589
Lander, WY 82520

Dear Ms. Yannone:

Following are the Wyoming department of Agriculture's (WDA) comments pertaining to the Scoping Notice for the proposed Environmental Impact Statement (EIS) for the proposed uranium *in situ* recovery (ISR) project to be known as the Gas Hills Uranium Project by the Lander Field Office of the Bureau of Land Management (BLM).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed EIS affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide the opportunity to express pertinent issues and concerns.

This project will impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and near this 8538-acre project area. For these reasons, we are making the following comments.

Following are specific individual effects upon livestock grazing to analyze in the EIS: decreased Animal Unit Months (AUMs) and pastures for grazing, increased off- and on-road traffic, increased number of speeding vehicles, construction of new roads and modifications to existing roads, increased number of vehicles causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased palatability of vegetation and forage from road dust and development activities, unsuccessful reclamation of disturbed areas, introduction and spread of noxious weeds, and other detrimental social and economic impacts on livestock operators and livestock management operations.

We strongly encourage BLM staff and commercial operators work closely and consistently with affected grazing permittees regarding this project. We support BLM's intent to seek and address the concerns and recommendations of these stewards of habitat, forage, and rangeland health. Moreover, it is imperative that BLM officials continuously inform all livestock grazing permittees who are directly or indirectly affected of the issues, decisions, and resulting actions regarding this proposal.

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We support compensatory mitigation discussions between Cameco Resources and livestock permittees to lessen the burden, livestock stress, and economic impacts to grazing permittees due to the proposed development. Such mitigation strategies and costs may include, but are not limited to, the following: movement of livestock to an open allotment or pasture, monitoring of impacts, construction of water and range improvements on either public or private land, purchase or lease of additional grazing land to replace lands lost to grazing, and reimbursement to producers for loss of AUMs and pastures.

Many environmental impact studies are deficient in identifying or analyzing social and economic impacts imposed by proposed energy developments. We strongly recommend this EIS includes a full and thorough social and economic impact analysis. Specifically, since grazing on public lands represents a vital economic value to agriculture producers and local communities, we recommend the analysis includes impacts upon livestock grazing in and adjacent to the planning area. The cumulative impacts of energy developments upon livestock grazing may jeopardize the livelihoods of grazing permittees. The loss or impaired ability of livestock grazing operations must be evaluated in the EIS.

In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these important environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study and the social impacts analyzed in the EIS.

Timely and successful reclamation and mitigation are needed and should be required. Reclamation and mitigation requirements and the consequences for Cameco failing to accomplish this reclamation and mitigation should be clearly stated.

Congressional mandates, federal statutes, and implementing regulations call for multiple use, and should be an integral part of the assessments. Moreover, the EIS should evaluate the impact of this project upon the intent expressed in the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals. The impacts upon food and habitat for fish and wildlife are usually well documented in NEPA documents. The consequences of this ISR project upon food and habitat for domestic animals deserve the same degree of study and documentation. Grazing is an essential tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for both wildlife and livestock. The EIS needs to include 1) these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives and 2) the impacts of this project on limiting the ability of livestock grazing to achieve these positive effects.

Peer-reviewed science should underlie decisions that are made. The EIS must identify the science supporting decisions and discussions regarding this project.

Decisions in the proposed plan should allow BLM officials, grazing permittees and Cameco the opportunity to work cooperatively. Flexibility to make the best site-specific, case-by-case decisions

that are in the best interests of the affected resources and citizens throughout the life of this plan should also be addressed.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions. We encourage continued attention to our concerns and look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



Jason Fearneyhough
Director

JF/jc

CC: Governor's Planning Office
Rocky Mountain Farmer's Union
Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
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Wyoming State Grazing Board
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