

Wyoming Department of Agriculture

2219 Carey Avenue, Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593 ■ Cust. Serv. Hotline: 888-413-0114 ■ Website: wyagric.state.wy.us ■ Email: wda1@state.wy.us

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



Dave Freudenthal, Governor
John Etchepare, Director

July 18, 2008

Mr. Tom Foertsch, Geologist
Bureau of Land Management, Casper Field Office
2987 Prospector Drive
Casper, WY 82604

Dear Mr. Foertsch:

Following are our comments pertaining to the Scoping Notice for the proposed Environmental Analysis (EA) for the proposed uranium in situ recovery (ISR) project to be known as the Reynolds Ranch by the Casper Field Office of the Bureau of Land Management (BLM).

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided 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 8,700-acre project area. For these reasons, we are making the following comments.

Following are some specific individual effects upon livestock grazing needing analyzed in the EA: increased off- and on-road traffic, increased number of speeding vehicles, construction of new roads and modifications to existing roads, increased number of vehicles in the area causing death or impairments of livestock, cut fences, opened gates, damaged range improvements, decreased AUMs and pastures for grazing, 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 understand that grazing permittees and landowners in the surrounding area are familiar with this process due to the Smith Ranch/Highland mine operations being adjacent to the project site. We strongly encourage BLM staff and commercial operators to continue to work closely and consistently with affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project. Agriculture producers are intimately familiar with areas affected by this proposal and they possess irreplaceable long-term, on-the-ground knowledge. They are

BOARD MEMBERS

Juan Reyes, District 1 ■ Jack Corson, District 2 ■ Jim Mickelson, District 3 ■ Jim Bennage, District 4 ■ Joe Thomas, District 5 ■ David J. Graham, District 6 ■ Gene Hardy, District 7

YOUTH ADVISORY BOARD MEMBERS

Patrick Zimmerer, Southeast ■ Dalin Winters, Northwest ■ John Hansen, Southwest ■ Bridget Kukowski, Northeast

particularly aware of both the individual and cumulative impacts upon wildlife, livestock, and rangeland health for the planning area. We highly recommend that during the planning process Cameco Resources, Inc. (CAMECO) and BLM officials 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.

We support compensatory mitigation discussions between CAMECO and livestock permittees to lessen the burden, livestock stress, and economic impacts to grazing permittees from this development. Such mitigation strategies and costs could include, but are not limited to, the following: movement of livestock to an open allotment or pasture, monitoring of impacts including use of the Wyoming Rangeland Monitoring Guide (August 2001), 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 that the EA includes a full and thorough social and economic impact analysis. Since grazing on public lands represents a vital economic value to agriculture producers and local communities, we specifically suggest that the analysis includes the 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 needs to be evaluated in the EA.

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 EA.

Timely and successful reclamation and mitigation are needed and should be required. Reclamation and mitigation requirements and the consequences for energy developers 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 EA 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 the 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

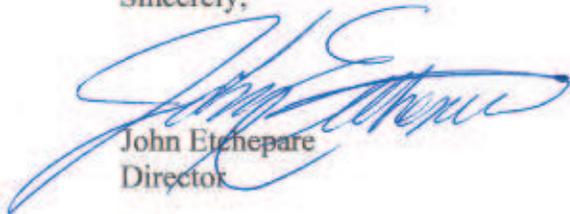
for both wildlife and livestock. The EA needs to include 1) these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives and 2) the impacts of this project on limiting the ability of livestock grazing to achieve these positive effects.

Peer-reviewed science should underlie decisions that are made. The EA needs to identify the science that supports the decisions and discussions regarding this project.

Decisions in the proposed plan should allow BLM officials, grazing permittees and private landowners 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 we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,



John Etchepare
Director

JE/jc

CC: Governor's Planning Office
Wyoming Game and Fish Department
Wyoming Board of Agriculture