



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

August 6, 2013

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 Environmental Impact Statement (EIS) for the proposed Lower Gas Hills Conventional Uranium Mine 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 project and 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 12,400-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), 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, possible 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.

The BLM should analyze the effects of possible reduced forage due to "drift" and "run-off" from sterilization of the proposed project area and noxious weed management. Rain and wind during and/or following spraying sterilizers and herbicides, may cause "drift" and "run-off" reducing forage in areas not targeted by a weed control program. We encourage strict guidelines on spraying to ensure the targeted areas of sterilizing and weed management are the only affected areas.

We support compensatory mitigation discussions between Strathmore 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

Equal Opportunity in Employment and Services

BOARD MEMBERS

Jana Ginter, *District 1* • Jim Hodder, *District 2* • Shaun Sims, *District 3* • John Moore, *District 4* • Alison Lass, *District 5*
Bryan Brost, *District 6* • Jim Price, Jr., *District 7*

YOUTH BOARD MEMBERS

Patrick Zimmerer, Southeast • Richard Schlenker, Northwest • John Hansen, Southwest • Cameron Smith, Northeast

water obtained from the uranium mine operation for future use by livestock and wildlife. We stress the importance of water within the project area, and the potential to improve overall infrastructure of the affected rangeland areas to better utilize and manage natural resources.

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

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 and management in and adjacent to the planning area. The cumulative impacts of energy developments upon 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.

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 impact upon food and habitat for fish and wildlife are usually well documented in NEPA documents. The consequences of this 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.

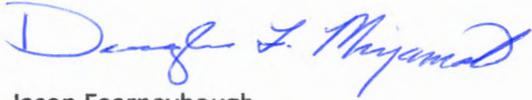
We strongly encourage BLM staff and commercial operators work closely and consistently with affected grazing permittees to address the concerns and recommendations of these stewards of habitat, forage and rangeland health. Moreover, it is imperative that BLM officials continuously inform all livestock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

Peer-reviewed science should underlie BLM's decisions. 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 Strathmore Resources 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,



FOR Jason Fearneyhough
Director

JF/jc

CC: Governor's Policy Office
Rocky Mountain Farmer's Union
Wyoming Association of Conservation Districts
Wyoming Board of Agriculture
Wyoming Farm Bureau Federation
Wyoming Game and Fish Department
Wyoming State Grazing Board
Wyoming Stock Growers Association
Wyoming Wool Growers Association