

EDO Principal Correspondence Control

FROM: DUE: / /

EDO CONTROL: G20070707  
DOC DT: 09/13/07  
FINAL REPLY:

John Etchepare  
Wyoming Department of Agriculture

TO:

Chairman Klein

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO: 07-0635

DESC:

Comments on the Generic Environmental Impact  
Statement (GEIS) Assessing the Potential  
Environmental Impacts Associated with Uranium  
Recovery (EDATS: SECY-2007-0420)

ROUTING:

Reyes  
Virgilio  
Kane  
Ash  
Ordaz  
Cyr/Burns  
Collins, RIV

DATE: 10/03/07

ASSIGNED TO:

CONTACT:

FSME

Miller

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action.

# EDATS

Electronic Document and Action Tracking System

**EDATS Number:** SECY-2007-0420

**Source:** SECY

## General Information

**Assigned To:** FSME

**OEDO Due Date:** NONE

**Other Assignees:**

**SECY Due Date:** NONE

**Subject:** Comments on the Generic Environmental Impact Statement (GEIS) Assessing the Potential Environmental Impacts Associated with Uranium Recovery

**Description:**

**CC Routing:** Region IV

**ADAMS Accession Numbers - Incoming:** NONE

**Response/Package:** NONE

## Other Information

**Cross Reference Number:** G20070707, LTR-07-0635

**Staff Initiated:** NO

**Related Task:**

**Recurring Item:** NO

**File Routing:** EDATS

**Agency Lesson Learned:** NO

**Roadmap Item:** NO

## Process Information

**Action Type:** Appropriate Action

**Priority:** Medium

**Signature Level:** No Signature Required

**Sensitivity:** None

**Urgency:** NO

**OEDO Concurrence:** NO

**OCM Concurrence:** NO

**OCA Concurrence:** NO

**Special Instructions:** For Appropriate Action.

## Document Information

**Originator Name:** John Etchepare

**Date of Incoming:** 9/13/2007

**Originating Organization:** Wyoming Department of Agriculture

**Document Received by SECY Date:** 10/3/2007

**Addressee:** Chairman.Klein

**Date Response Requested by Originator:** NONE

**Incoming Task Received:** Letter



# Wyoming Department of Agriculture

2219 Carey Avenue, Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593 ■ 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*

September 13, 2007

Chairman Dale E. Klein  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Chairman Klein:

Following are our comments on the Nuclear Regulatory Commission's (NRC) intent to prepare a Generic Environmental Impact Statement (GEIS) assessing the potential environmental impacts associated with uranium recovery.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the recovery of uranium has potential major impacts upon our agriculture industry, our natural resources, and the welfare of our citizens, it is important that the Wyoming Department of Agriculture (WDA) remain involved in all actions and decisions and that we have the opportunity to express pertinent issues and concerns.

The recovery of uranium in Wyoming has potential to critically impact livestock grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, both in and near the project areas.

In addition to these impacts, the NRC should evaluate the cumulative effects of this recovery and other uranium processes in the area for their impacts on rangelands, forage and habitat, noxious weeds, ground and surface water, riparian areas, and livestock grazing. We are specifically concerned about the disposal of materials, water, and waste generated by the various uranium recovery methods.

We ask the NRC to analyze the Environmental Impacts upon the following: off-road traffic, increased road traffic and speeding vehicles; destroyed cattle guards; deaths and impairments of livestock; decreased forage and rangeland health; consequences on Animal Unit Months and pastures for grazing; social and economic impacts on livestock operators; cut fences, left-open gates, damaged range improvements, introduction and spread of noxious weeds; and other potential conflicts with livestock management operations.

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We strongly encourage the project operators and NRC officials to keep surrounding landowners and affected public land grazing permittees informed and to work with them to learn of their concerns and recommendations regarding recovery projects.

Additionally, we support the State of Wyoming's request to act as a cooperating agency during the National Environmental Policy Act process to develop the GEIS.

#### Domestic Livestock Grazing

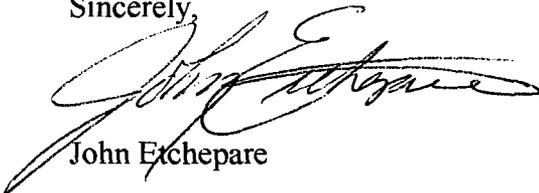
Grazing on public lands represents a vital economic value to agriculture producers and to local communities. In addition to its economic value, grazing represents irreplaceable environmental and social values, contributing to the preservation of open space, the scenic vista and visual beauty of the area, 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 analysis of the environmental impact areas.

In fact, livestock grazing is an essential resource management tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The Environmental Impact Area analysis needs to include these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives, and needs to analyze the effects of this proposal upon the ability of livestock grazing to achieve these objectives.

Decisions in the GEIS should allow NRC officials, grazing permittees, and uranium company officials the opportunity throughout the life of the recovery to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interest of the affected resources and citizens. The NRC must make decisions based on local information and conditions and not on nation-size mandates which commonly do not apply locally.

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

Sincerely,

A handwritten signature in black ink, appearing to read "John Etchepare", written over a horizontal line.

John Etchepare

JE/mh

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CC: Governor's Planning Office  
Wyoming Farm Bureau Federation  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Game and Fish Department  
Wyoming Board of Agriculture