



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Buffalo Field Office  
1425 Fort Street  
Buffalo, Wyoming 82834-2436



JUL 17 2008

Ron C. Linton  
Project Manager  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Mr. Linton:

Following your request (May 23, 2008), several of my staff reviewed the Environmental Assessment (EA) for Cogema Mining Inc.'s proposal to restore the Irigary and Christensen Ranch projects to operating status. They do not have any significant concerns with the EA, but do have recommendations that would strengthen the document. The comments are attached.

If you have any questions about their comments, please contact Thomas Bills, Environmental Coordinator, at (307) 684-1133.

Sincerely,

Chris E. Hanson  
Field Manager

**Cogema Mining Christiansen/Irigary Restoration**  
**BLM Buffalo Field Office Comments**  
**July 17, 2008 Comment Response Form**  
Page 1 of 1

<b>Comment Number</b>	<b>Page</b>	<b>Line Number</b>	<b>Comment</b>
001		General	The EA is concise with many of the impact analyses directing the reader towards previous analyses, which is acceptable, but a reviewer cannot review properly without the earlier documents.
002	6	Canada lynx	There are historic lynx observations within Johnson County – Big Horn Mountains. However, lynx habitat is mesic coniferous forest which are not present anywhere near the project area. Closest habitat approximately 50 miles west in Big Horn Mountains, no lynx population is present in the Big Horns today.
003	6	Bald eagle	A bald eagle nest is present north of the Irigary Rd where it crosses the Powder River. Eagles have used the nest for the last 4 or 5 years. I think you should identify the nest. I don't know how much of the mine traffic goes that direction (towards Buffalo) and don't think the eagles will be negatively affected by the anticipated level of mine traffic.
004	7	Wildlife surveys	Are there any conclusions that can be included from the annual surveys – sage grouse breeding ground trend, trends in numbers of big-game and raptor nests, etc? A little more information to support that impacts have indeed been low.
005	7	noise	Some wildlife species are tolerant of noise and others are not, perhaps list a few of the species the Cogema report said were generally tolerant. Are any sage-grouse strutting grounds within two-miles of either facility – particularly to the east? Sage grouse may potentially be listed under the Endangered Species Act and noise has been reported to potentially be a negative impact to their breeding behavior.
006	8	visual	How long until the well fields are projected to be reclaimed and restored? duration of impacts?
007	8	Tribal consultation	Give more information on your effort to contact the tribes to demonstrate you've made a reasonable effort. Was a letter sent, and if so when? Were phone calls made, and if so how many attempts made?
008	8	Cultural Resources/ Visual	Existing conditions have changed in the immediate area of this mining operation, specifically pertaining to the Pumpkin Buttes as a Traditional Cultural Property (TCP) and a cultural resource, since the 1998 concurrence letter from SHPO. In 2006 all of the Buttes were recorded as site number 48CA268 and are determined to be eligible under NRHP criteria A, B, and D. The setting of the Buttes has also been determined to be a contributing aspect of integrity for the property. Therefore, any visual impacts to that setting would be an adverse effect to historic properties (36 CFR Part 800.5 –Protection of Historic Properties – Assessment of adverse effects). That is why the BLM does site-specific consultation for projects within two miles of the Buttes and not just a scoping level consultation letter.
009	8	SHPO consultation	SHPO records indicate that avoidance was required for 48JO1548 as well as 48CA533 in the 1998 concurrence letter. I didn't see any mention of 48JO1548 in this document.
010	10	Tribal consultation	Editing question: It says "Nine Section 106 tribal consultation letters were sent to eleven tribes..."