DEPARTMENT OF GAME, FISH AND PARKS
Cleghorn Fish Hatchery
4725 Jackson Boulevard
Rapid City, South Dakota 57702-4804

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October 3, 2008

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US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Uranium Recovery GEIS

The South Dakota Department of Game, Fish and Parks (GFP) has reviewed the Generic Environmental Impact Statement for In-Situ Leach Uranium Milling Facilities (GEIS). GFP is pleased to see many of our concerns are already addressed in the draft document. Below we are offering comments for consideration into the decision making process and completion of the Final GEIS.

General comment to GEIS

- Consider a vegetation chapter emphasizing impacts to plant communities, wetlands, invasive species, noxious weeds, and introduced species.
- Consider a chapter emphasizing effects on wildlife from habitat creation or conversion, with specific attention to birds, large and small mammals and reptiles.
- Discuss mitigation for temporary loss, or conversion of habitat.
- Assess species of "greatest conservation need" identified in the State's Wildlife Action Plans.
- Indicate life expectancy of the Final GEIS.

Specific Issues

Wildlife exposure to toxic solutions stored in ponds is mitigated by various management actions including covers or nets. A decision to permit ponds without covers is often made with uncertainty of wildlife effects to low and medium dose and exposure information of the stored mining solutions.
Describe the effects on bird, bats and other wildlife to low, med and high level dose and exposure to toxic mining solutions stored in mine ponds.
Determine relevant levels of management actions for wildlife protection from low and medium level exposure to toxic solutions in storage ponds.
Assess the degree of impacts to migratory birds and other wildlife in the mine districts to toxic exposure.

E-RIDS = ADM-03
Add = J. Park (JRP)

SUNSI Review Complete
Template = ADM-013

Protection of wildlife from injury hazards and entrapment associated with steep-sided lined retention ponds is mitigated by fencing. Often fencings is designed to exclude only larger mammals.
Describe the ecological function of small mammal and reptiles in the mining districts.
Determine relevant, reasonable levels of management action for protection of large or small mammals and reptiles.
Assess the benefits and need of pond fencing to for protection of small mammal and reptiles communities.

Monitoring aquatic communities during operations can determine relative health of nearby waterbodies.
Describe sensitivity of aquatic communities to mine releases.
Determine use of aquatic criteria to measure project impacts and status of aquatic communities.
Assess aquatic criteria, such as distribution and abundance, which is known to be sensitive to environmental conditions.

Sagebrush ecosystems require unique management because of obligate wildlife species, and demands from human use and other threats. Sagebrush is a major vegetative component in the biome which most of the ISL mining districts are located.
Describe sagebrush and obligate species threats from various land uses and vulnerability of functional from changing composition, fragmentation, and vegetative type conversion.
Determine relevant, reasonable levels of management action for mitigation of sagebrush ecosystem and obligate species.
Assess/ evaluate the degree of impacts on sagebrush ecological function in the mine districts.

Exploration at locations of historic uranium deposits is a determining factor in selection of the 4 mine districts discussed in the draft GEIS. Mining in these areas have potential to encounter improperly abandoned exploration holes from earlier exploration programs or abandoned uranium mines. Encountering improperly abandoned exploration holes or abandoned (upgradient) mines have caused excursions. These excursions and be particularly troublesome and have increased the time necessary for remediation from weeks or months to as long as eight years.
Describe the occurrence of improperly abandoned exploration holes and aquifers contaminated by abandoned uranium mines

Determine technical considerations, and financial bonding response for "long-term" vertical excursions from improperly abandoned exploration holes to other exempt and nonexempt aquifers.
Assess consequences from long-term excursions and the subsequent remediation of nonexempt aquifers, increases in time and costs of ground water restoration, the demands on solution storage facilities and environmental bonding required for excursions associated with encountering improperly abandoned exploration holes or (upgradient) abandoned mines

If you have any questions please contact me by any of the numbers listed below

Sincerely,

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