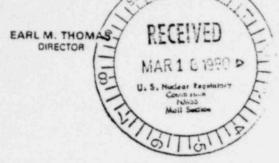
PDR





ED HERSCHLER GOVERNOR

Same and Fish Department



CHEYENNE, WYOMING 82002 March 10, 1980

> EAR 433 Federal American Partners Uranium Mill, Gas Hills Uranium District, Fremont County, Wyoming.

Mr. D. M. Gillen U.S. Nuclear Regulatory Commission Division of Waste Management, 483-SS Washington, D. C. 20555

Dear Mr. Gillen:

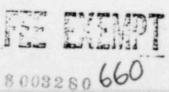
Our review of the Federal American Partners Environmental Assessment Report for proposed expansion and modification, and source material license renewal (SAU-667) Fremont County, Wyoming (Docket No. 40-4492) indicates a number of shortcomings in the document.

We are concerned that the document failed to include details of tailings ponds to be created and left after the project. The document should also include information as to whether or not the ponds will be of adequate size and water quality to support a fishery. Details of monitoring the water quality should be provided.

The antelope densities reported on pages 2-40 and 2-41 are five years old. Data cited are 11 years old. There are no site-specific data in this document, and it appears as if the consultant did not sample the site. If such surveys were done, they are not evident here. More current population data is needed. The Bureau of Land Management is cited as the source for antelope data, and the Game and Fish Department data cited are over 10 years old. Consultation with the District Biologist in Lander would have provided updated population information and antelope seasonal range information.

Elk and bighorn sheep do not occur on this site and should not be mentioned. This document suffers in several areas. The most serious deficiency is the lack of site-specific data on anything but small mammals. It is fairly obvious that this Department has not been contacted in the past three years about the project, and there has been no attempt to update data.

The 1974 threatened and endangered species pamphlet has been obsolete since 1976. The only threatened or endangered species in Wyoming are those federally listed. Of these species listed, only the black-footed ferret might be near the site.



Add'l ...te

Mr. F. M. Gillen Page 2, EAR 433 FAP March 10, 1980

The species lists are not site-specific. There is no habitat on or near this site for species such as bitterns, black-crowned night herons, grebes, loons, accipiters, and much of the rest of the bird species list. This and the general discussions of big game ecology are simply filler. This entire report could have been done without visiting the site.

On a positive note, the reclamation seed mixture is very good. We suggest that the company contact this Department or inspect mining and reclamation permits to obtain current regional data, up-to-date range maps, population information, recommendations for reasonable species lists, and recommendations for data sources pertinent to this project before a DES is written.

Please contact us for further assistance on this project.

Sincerely.

W. DONALD DEXTER, ASSISTANT DIRECTOR WYOMING GAME AND FISH DEPARTMENT

WDD/HBM/mlr

cc: Game Div. Fish Div. State Planning Coordinator USF&WS, Billings