



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

State Office

P. O. Box 1828

Cheyenne, Wyoming 82001

ER 80/1021

Ms. Kathleen Hamill
U.S. Nuclear Regulatory Commission
Mail Stop 483-S
Washington, D.C. 20555

Dear Ms. Hamill:

We have reviewed the environmental report for the Sand Rock Mill Project, Laramie County, Wyoming, and have the following comments.

General

While the surface ownership of the proposed site is non-federal, most of the mineral rights are administered by the BLM. In fact, the area has been leased for the oil and gas resources. The development of any of the outstanding oil and gas leases may conflict with uranium extraction and vice versa. We believe that NRC should address this situation in the DEIS.

The extent of BLM involvement was not apparent from this document, nor from the scoping session. We feel at this time, that BLM should only be involved as a reviewing rather than as a cooperating agency. In the event that the need for rights-of-way (ROW) across public lands are identified, we would appreciate being notified as soon as possible to assure that NEPA requirements for ROW processing are met by NRC's document.

We also believe that NRC should consider the following possible impacts in their DEIS.

1. The cumulative impacts of this project (added to the ongoing coal developmental projects) upon air quality, water consumption and quality, socioeconomics, community services, and local transportation systems.
2. Any long-term effects of storing uranium tailings and mine wastes.
3. Regional and local effects, especially downstream or downwind of the "accidents" described in the report.

The no-action alternative should be given careful consideration because of current uranium market conditions.

Specific Comments on the Report

Page 2-189. Perennial ragweed (Ambrosia psilostachya) and white leaved ragweed (Ambrosia tomentosa) are not on the list of designated noxious weeds for Wyoming. This should be corrected.



OCT 30 1980

8012010 272

C

17805

Add'l info

Page 2-272, third paragraph, last sentence. The estimate is not conservative, it is representative and should be corrected.

Page 5-43. The estimated length of time for each vegetation type to be eliminated or disturbed (in acres) should be stated here. The discussion should address the loss of production.

Page 5-48. Why is $22 \mu\text{g}/\text{m}^3$ used as background, when $25 \mu\text{g}/\text{m}^3$ is referred to on page 2-272? These should be adjusted.

Page 5-51. State the total number of AUM's and livestock which would be displaced, and over what period of time.

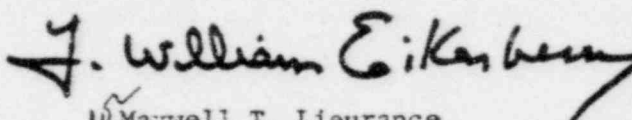
Page 6-35 through 6-38. The description of the vegetative sampling procedures should be referenced and placed in the appendix.

Page 6-63, third paragraph under Ecological Monitoring. Productivity should be included in the factors to be monitored in the reclaimed area.

Page 10-57. The last sentence is not objective and should be rewritten or eliminated.

We appreciated the opportunity to review the report. We would like to review the DEIS when it is released.

Sincerely yours,


for Maxwell T. Lieurance
State Director

cc:
DM Casper
AM Buffalo
WO (202B)