



WYOMING GAME AND FISH DEPARTMENT

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August 1, 2011

WER 2792.04
Department of Environmental Quality
Land Quality Division
Review of PIAA
Lost Creek Uranium Proposal
NFU Wyoming LLC
Sweetwater County

Melissa L. Bautz
Land Quality Division (LQD)
Wyoming Department of Environmental Quality (WDEQ)
510 Meadowview Drive
Lander, WY 82520

Dear Ms. Bautz:

The staff of the Wyoming Game and Fish Department (WGFD) has reviewed the recent PIAA/DDCT (Project Impact Area Analysis and Density/Disturbance Calculation Tool) conducted by Ur-Energy for the Lost Creek Uranium proposal in Sweetwater County.

As per Governor Mead's Executive Order for Sage Grouse 2011-5, the PIAA process is now called the DDCT (Density Disturbance Calculation Tool). Pursuant to this name change and an updated procedure, Ur-Energy conducted a DDCT for the Lost Creek project including a lek-by-lek analysis. We have reviewed this latest DDCT and have found its results comply with the current Governor's Executive Order.

In addition, we have reviewed additional Ur-Energy documents related to the Lost Creek development including their sage grouse monitoring plan and Section OP-6 (Wildlife) of the WDEQ permit application since it has become available since our last letter to DEQ (March 3, 2011). The sage grouse monitoring plan is sufficient and appropriate (using a BACI design) and meets the need of the Governor's Order.

We re-reviewed the proposed use of the two east-west entrance roads to the project site in relation to existing sage grouse leks. Three leks are within 0.6 miles to these roads at approximately 0.5 miles. As these existing roads are blocked from view to the leks by topography, we are not concerned with the plans to upgrade in lieu of creating new roads. We have concerns that the creation of new roads would result in a greater negative impact to sage grouse by fragmenting existing unfragmented nesting and brood rearing habitat.

Ms. Melissa L. Bautz
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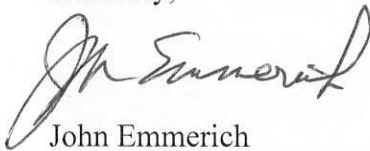
Through compliance with provisions of the Governor's Sage Grouse Executive Order, no decline in sage grouse numbers is expected. However, in addition Ur-Energy has committed to "adaptive management" for mitigation if declines in sage grouse populations are identified through monitoring. If declines occur, and the declines are attributable to mining related influences, Ur-Energy will coordinate with DEQ and WGFD to evaluate and identify appropriate mitigation to reverse negative sage grouse trends caused by Ur-Energy's activities.

Ur-energy has agreed to begin development on this project outside of the seasonal stipulation period (March 15-June 30). Road traffic will be highest during this period but Ur-Energy has stated that this effort should be completed in 6 to 9 months. Therefore, if the development begins during the summer months, this more active disturbance period can be completed entirely outside of the stipulation period. If, for unforeseen reasons, the development activity must extend in to the seasonal stipulation period (beyond March 15), we recommend Ur-Energy adhere to a "daily use" timing stipulation of no traffic before 8 am or after 6 pm from March 15 until May 15. Once development is in place, "normal" mine operations will commence which will include less traffic (workers and deliveries). As noted, monitoring protocol are in place to evaluate any potential impacts from mine operations including traffic on roads. In addition, Ur-energy agreed to raptor proof the overhead lines that will be installed for this project.

We appreciate Ur -Energy's participation and commitment in meeting the requirements outlined in the Governor's Order.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Scott Gamo, Staff Terrestrial Biologist, at 307-777-4509, or Mary Flanderka, Habitat Protection Supervisor, at 307-777-4587.

Sincerely,



John Emmerich
Deputy Director

JE/mf/sg

cc: USFWS
NFU Wyoming 5880 Enterprise Dr. Ste 200, Casper, WY 82609
John Cash, Ur-Energy, Casper