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**APPENDIX B:**  
**SUMMARY OF THE PUBLIC SCOPING PROCESS FOR THE ULP PEIS**

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**APPENDIX B:****SUMMARY OF THE PUBLIC SCOPING PROCESS FOR THE ULP PEIS****B.1 INTRODUCTION AND BACKGROUND**

The U.S. Department of Energy (DOE) issued the Notice of Intent (NOI) to prepare the Uranium Leasing Program (ULP) Programmatic Environmental Impact Statement (PEIS) on June 21, 2011 (see Volume 76 of the *Federal Register*: 76 FR 36098). It issued a supplemental notice on July 21, 2011 (76 FR 43678) that announced four public scoping meetings and extended the scoping period through September 9, 2011.

The issuance of the NOI marked the start of the National Environmental Policy Act (NEPA) process for the ULP PEIS that includes opportunities for public participation. This appendix presents a summary of the comments that were received during the scoping period of June 21 through September 9, 2011, for consideration in preparing the Draft PEIS. All comments, regardless of how they were submitted, were given equal consideration in the development of this Draft ULP PEIS.

**B.2 SCOPING PROCESS**

The NOI and the supplemental notice identified three methods by which the public could provide scoping comments or suggestions for the scope of the ULP PEIS:

- In person at public scoping meetings;
- By electronic mail (e-mail) and regular mail; and
- By electronic comment submittal through the project web site.

DOE conducted scoping meetings for the ULP PEIS at the four locations and on the dates shown in Table B-1. The number of people who attended these meetings is also presented in Table B-1. Meetings were held in Montrose, Naturita, and Telluride, Colorado, and in Monticello, Utah. Each meeting started at 5:30 with registration to provide oral comments, and a brief presentation was given by DOE at 7:00 p.m. In addition to presenting oral comments at the scoping meetings, stakeholders could also e-mail comments, send comments by mail, or could fill out a comment form at the scoping meetings or on the project web site (<http://ulpeis.anl.gov/>).

During the scoping period, a total of 287 unique comment documents were received from individuals, organizations, and government agencies that addressed the scope of the ULP PEIS. A “comment document” can be a written document (web form or comment form that was distributed at the scoping meetings or by mail), an e-mail submission, or an oral presentation given during a scoping meeting that provides comments on the scope and content of the ULP PEIS. A single comment document may contain multiple comments on one or more issues. There were 61 comment documents provided through the scoping meetings, 164 e-mails and letters, and

1 62 comment forms submitted through the project web site. Among the 287 comment documents  
 2 received, 8 were from Federal, state, or local government agencies; and the remainder were from  
 3 individuals or other organizations. Comment documents were received from 13 states; however,  
 4 approximately 88% of the comments were from Colorado communities or communities near the  
 5 DOE ULP lease tracts.

### 8 **B.3 SUMMARY OF SCOPING COMMENTS**

10 All public scoping comments were reviewed and considered in determining the scope for  
 11 this Draft ULP PEIS. Table B-2 summarizes the public scoping comments that were considered  
 12 to be within the scope of the Draft ULP PEIS. Those that were considered outside the scope are  
 13 summarized in Table B-3. The rationales for the determinations are also presented in both tables.

15 **TABLE B-1 Public Scoping Meeting Locations,**  
 16 **Dates, and Attendance**  
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Location	Date	No. in Attendance
Montrose, Colorado	August 8, 2011	65
Telluride, Colorado	August 9, 2011	85
Naturita, Colorado	August 10, 2011	51
Monticello, Utah	August 11, 2011	1
Total		202

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1 **TABLE B-2 Public Scoping Comments Considered To Be Within the Scope of the ULP PEIS**

Public Scoping Comment	Rationale
<b>1. Alternatives</b>	
1A. Support for Alternative 1.	Alternative 1 is included in the range of reasonable alternatives that are evaluated in the Draft PEIS. Under this alternative, all the existing leases (there are 29) would be terminated, and reclamation would be completed on disturbed areas that remained on the lease tracts. DOE would continue to manage the withdrawn land but would not lease the land for uranium mining.
1B. Support for Alternative 5 because uranium is a clean nuclear energy source that can be mined safely. Some commenters urged DOE to continue the leasing program as it was before the preparation of the PEIS, arguing that companies and individuals should have the right to mine and produce uranium and vanadium just as companies extract coal and other resources such as natural gas.	Alternative 5 is included in the range of reasonable alternatives that are evaluated in the Draft PEIS. Under this alternative, all 31 lease tracts are evaluated for potential exploration, mine development and operations, and reclamation. The 29 leases that were signed in 2008 would have expired in 2018, but these leases have been placed on hold for the duration that it would take to complete this PEIS. The leases would be extended for a duration equivalent to the time taken to complete the PEIS (e.g., if 3 years were added, the end date for the leases would be 2021).
1C. Alternatives should include these: maintaining current withdrawals without issuing leases; expanding the lease program without issuing leases; issuing leases only on the previously active tracts for the purpose of reclamation; issuing fewer leases requiring interim reclamation; and requiring additional lease stipulations for protection of public lands.	Currently, 29 leases exist (this has been the case since 2008); however, a situation in which current withdrawals would be maintained without issuing leases would occur under Alternative 1. Reclamation that was needed and terminations of the 29 existing leases would also be done as part of Alternative 1. Current leases include adequate stipulations providing appropriate protection of public lands.
1D. An Alternative that stipulates protection of the Dolores River and San Miguel River watersheds. Lease tracts in the Dolores River Canyon should be withdrawn from the ULP (i.e., Slick Rock Lease Tracts 13, 13A, and 14).	Leases for Lease Tracts 13 and 13A have been in existence since 1974 and still currently exist. Lease Tract 14 (Tracts 14-1, 14-2, and 14-3) is not presently leased. Future uranium mines on all three lease tracts would be expected to be at least 0.25 mi (0.40 km) from the Dolores River. As discussed in the rationale for 1C, Alternative 1 would result in the existing leases being terminated and the currently withdrawn lands being maintained by DOE without leasing for uranium mining.
1E. An Alternative to keep the lease tracts in place but to prohibit any further mining or exploration until reclamation has been completed on existing or old leases.	DOE believes that the range of reasonable alternatives evaluated in the Draft PEIS addresses this concern. Under Alternatives 1 and 2, the existing leases would be terminated, and reclamation would be conducted. In addition, all legacy mine sites located on the DOE lease tracts have been reclaimed.
1F. Vacate all leases and re-bid them with both a royalty component and a performance-based component.	DOE's ULP incorporates a royalty component that is inherently performance-based. The option of terminating all leases is incorporated in Alternatives 1 and 2.

**TABLE B-2 (Cont.)**

Public Scoping Comment	Rationale
<b>2. Impact Analysis</b>	
<p>2A. Cultural resources must be adequately studied, documented, and protected. DOE is encouraged to work closely with local Native Americans familiar with surrounding anthropological resources and cultural artifacts. Archaeological surveys should be conducted where future mining and disturbances might occur, and all recorded sites must be evaluated for significance. An antiquities preservation plan should be prepared for unavoidable impacts.</p>	<p>The analysis of cultural resources discussed in the Draft PEIS for the five alternatives evaluated addresses this concern. DOE initiated government-to-government consultation with six tribes. The status of these consultations to date is summarized in Chapter 6 of the Draft PEIS. The Draft PEIS does identify archaeological surveys to be conducted on a project-specific basis as exploration and mine development plans are submitted to DOE for approval. The preparation of an antiquities preservation plan and other plans would be done consistent with appropriate requirements.</p>
<p>2B. Consider negative impacts on tourism, recreation, and property values, and the overall impact on the local economy and land use in surrounding communities. There is concern that uranium mining could create a boom-and-bust economy.</p>	<p>The impacts analysis in Chapter 4 for socioeconomics addresses this concern.</p>
<p>2C. Estimate the number and types of jobs to be created under each alternative, and how each alternative might affect the number of employees needed from outside the region. The concern is that uranium mining would not provide many jobs, and that those jobs would be available only for the short term.</p>	<p>Same as 2B.</p>
<p>2D. Evaluate impacts of uranium mining on water quality. Many commenters were concerned with the impacts on downstream water users. They thought that downstream water quality should be included in the impact analysis, and that water use for uranium mining and milling should be included in the analysis.</p>	<p>The impacts analysis for water resources addresses potential impacts on water quality from the ULP proposed action (i.e., from exploration, mine development and operations, and reclamation). Uranium ore milling or processing (e.g., at the proposed Piñon Ridge Mill or at White Mesa Mill) is outside the scope of the ULP proposed action. However, the cumulative impacts analyses conducted for the Draft ULP PEIS considered potential impacts from the proposed Piñon Ridge Mill and the White Mesa Mill.</p>
<p>2E. Include best management practices (BMPs) to minimize stormwater runoff as well as a mitigation measure that would require all vent shafts to be grouted where they intercept aquifers.</p>	<p>BMPs, mitigation measures, and compliance measures are discussed in the Draft ULP PEIS (see Section 4.6 for a summary list) and were considered in the impact analyses for specific resource areas discussed in Chapter 4. These measures include ones that address stormwater runoff. Final measures for mitigating potential impacts would be determined in the record of decision (ROD) for the ULP PEIS and incorporated into approved mine plans, as appropriate.</p>

**TABLE B-2 (Cont.)**

Public Scoping Comment	Rationale
2F. Provide description of uranium mining activities and a realistic estimate of activities that will occur on lease tracts until the end of the 10-year time frame.	Since project-specific mine plans were not available prior to the start of the preparation of this Draft ULP PEIS, existing information based on current permits was augmented with reasonable assumptions to simulate realistic but upper-bound mining scenarios (covering, for example, how many mines would operate at the same time, the size of the mines, tonnage produced per mine, amount of water used, number of workers, and types of equipment used). These assumptions provided the basis for the impacts evaluation discussed in Chapter 4 of this Draft PEIS, providing reasonable upper-bound estimates for consideration. These assumptions are discussed in Chapter 2 of this Draft PEIS.
2G. DOE should undertake its duties under Section 7 of the Endangered Species Act (ESA). The PEIS must fully address impacts on native fish, on aquatic species and riparian habitat, and on the river corridor. The PEIS should exclude development on all designated critical habitat areas. Species downstream from the lease tracts on the Colorado River should be included in the analysis of biological resources. The PEIS should fully survey the area for rare and imperiled species and should include an ecosystems services analysis of the Dolores River watershed.	DOE is engaged in consultation with the USFWS per Section 7 of the ESA. A biological assessment is also being prepared as part of this consultation. This Draft ULP PEIS evaluates potential impacts on ecological resources in the area of the lease tracts, as well as on the threatened and endangered species identified through consultation with the USFWS.
2H. Include impacts from the release of radioactive and other toxic materials into the atmosphere from mining and milling operations.	The Draft ULP PEIS addresses the potential impacts from the release of material associated with the ore production. The potential impacts of milling operations are outside the scope of the proposed action but are addressed as part of the cumulative impacts analysis in Section 4.7.
2I. Evaluate the amount of disturbed land that will be a source of increased fugitive dust. There is high potential for air toxicity affecting a widespread area as a result of any weather events that would involve high winds over a dry desert. DOE should identify air emissions, evaluate adverse National Ambient Air Quality Standards (NAAQS) impacts on any Federal Class I or sensitive Class II areas (Colorado National Monument), and include plans to control dust.	The analyses for air quality included in Sections 4.1.1, 4.2.1, 4.3.1, 4.4.1, and 4.5.1 of this Draft ULP PEIS address this concern.
2J. Evaluate impacts from the release of radon gas and radioactive particulates from mine openings and radon vents; also determine the emissions from mine operations and the impacts on air, climate change, soils, water, and vegetation.	The analysis for potential human health impacts addresses potential impacts from radon gas and uranium on workers and members of the general public within a 50-mi (80-km) radius based on the maximum distance that models allow for deriving dose estimates. Potential impacts on air, climate change, soils, water, and vegetation are addressed in Chapter 4.

**TABLE B-2 (Cont.)**

Public Scoping Comment	Rationale
<p>2K. Address the long-term impacts on human health, livestock, and wildlife, including food sources, both locally and regionally, due to mining and milling activities. The PEIS must consider health effects of mining and milling, including cancer incidence, on the human population in towns neighboring the mining operation, workers, and local residents.</p>	<p>The analyses of impacts on human health and ecological resources (on livestock and wildlife) address the concern about potential impacts from mining operations. The analysis of human health impacts in Chapter 4 considers the population within a 50-mi (80-km) radius of the lease tract. The analysis for potential impacts on ecological resources addresses resources in the three counties that encompass the 31 lease tracts. The cumulative impacts evaluated in this Draft ULP PEIS (see Section 4.7) address a 50-mi (80-km) radius of the lease tracts and include the White Mesa and Piñon Ridge Mills.</p>
<p>2L. Describe the impacts from the increased use of area roads, as well as mitigation measures for traffic. The PEIS should evaluate potential adverse impacts on public health and safety, the risk of collisions with wildlife, and the effects on the environment from increased truck traffic that would pass through the Curecanti National Recreation Area. The PEIS should also analyze potential impacts of ore haul routes next to rivers and streams.</p>	<p>The analysis for transportation impacts from hauling ore from the DOE ULP lease tracts (including potential traffic impacts) is discussed in Chapter 4 of this Draft ULP PEIS. Measures to mitigate potential impacts from transportation are also summarized in Section 4.6. The analysis provides an estimate of the potential increase in the number of truck trips on the haul routes to the two mills (proposed Piñon Ridge Mill and the White Mesa Mill). Mitigation measures are discussed in Section 4.6 of this Draft PEIS. Any potential impacts on streams or rivers would result from an ore spill following a transportation accident, as discussed in Section 4.3.10.4 of this Draft ULP PEIS. The Cotter Corporation uranium mill in Cañon City, Colorado, is not discussed in this PEIS because it is currently inoperable, and Cotter Corporation has notified the Colorado Department of Public Health and Environment that the radioactive materials license for the mill will not be renewed. Accordingly, U.S. Highway 50, through the Curecanti National Recreation Area, is no longer an ore haulage route.</p>
<p>2M. Address the impacts from erosion by wind and rain runoff. The PEIS must identify, review, consider, and reference all state geological studies and U.S. Geological Survey (USGS) studies of the Uravan Mineral Belt and surrounding areas.</p>	<p>Potential erosion impacts are evaluated in this Draft ULP PEIS (see Sections 4.1.3.1, 4.1.3.2, 4.2.3, 4.3.3, and 4.4.3). Relevant USGS studies, reports, and papers were reviewed to support the discussion and analyses presented in this Draft PEIS.</p>
<p>2N. Consider the environmental sensitivity of Conservation Areas of the Colorado Natural Heritage Program, Areas of Critical Environmental Concern (ACECs), and Special Recreation Management Areas (SRMAs) in the Dolores River Canyon. Development in the three Wilderness Study Areas (WSAs) and 10 Citizen Wilderness Proposals in the affected area should be excluded. The PEIS should consider the views from the Dolores River Canyon at each lease location. There is a concern about the visual impacts that would result from ore trucks travelling along Highway 141, which has been designated the “Unaweep-Tabeguache Scenic and Historic Byway.”</p>	<p>The analysis for visual resources addresses the potential impacts on views from sensitive areas, such as the Dolores River Canyon and the Unaweep-Tabeguache Scenic and Historic Byway.</p>



TABLE B-2 (Cont.)

Public Scoping Comment	Rationale
<p>2O. Any aboveground equipment that makes noise louder than 75 dB that is located within 1 mi (1.6 km) of the Dolores River or any residence should be limited to operating only from 10 a.m. to 6 p.m. on weekdays, and all aboveground blasting anywhere should be limited to between 10 a.m. and 6 p.m. only on weekdays. The PEIS must assess the impacts of noise from intake and exhaust vent fans. The PEIS must include an assessment of the effects from noise on insects, birds, mammals, animal hunting habits, animal mating and reproduction, recreation, grazing, and human habitation.</p>	<p>Any mine plans that would be approved would include measures for mining activities to meet applicable Federal, state, and local requirements, including any requirements regarding noise. It is expected that most mining activities would occur during normal daytime work hours on weekdays. The analysis of potential noise impacts in Chapter 4 of this Draft PEIS addresses potential impacts from the equipment used, including impacts from intake and exhaust vent fans. The analysis for potential impacts on ecological resources also addresses noise. The responses of wildlife to noise would vary by species; the individual's physiological or reproductive condition; distance; and the type, intensity, and duration of the disturbance. Excessive noise levels can alter wildlife habitat use and activity patterns (e.g., exacerbating fragmentation impacts), increase the animals' stress levels, decrease their immune response, reduce reproductive success, increase predation risk, degrade communication, and cause hearing damage. Generally, deleterious physiological responses to noise occur at exposure levels of 55 to 60 dBA or more, although other potential impacts on wildlife would occur at lower levels. Noise levels tend to be lower than this exposure level at distances of more than 1,000 ft (300 m) from the noise source. With the exception of blasting, rock drilling, or pile driving, typical noise levels for heavy equipment range from 75 to 90 dBA at a distance of 50 ft (15 m). If only geometrical spreading and ground effects (among noise attenuation mechanisms) are considered, and if an upper range of 90 dBA is assumed, a noise level of 55 dBA would occur at about 1,100 ft (340 m) from the noise source.</p>
<p>2P. Assess topsoil required for reclamation, assess gaps in reclamation soil requirements and availability, and determine the impacts if there was an insufficient amount of topsoil.</p>	<p>Mine plans are required to address reclamation procedures, and they address surface soil material needed for covering the waste-rock pile and other disturbed surfaces. The source of this top cover material is typically soil material removed from the lease tracts during the course of mine development and operations and retained on the site for subsequent use during the reclamation phase.</p>
<p>2Q. Consider the proximity to the Dolores River and whether a 0.25-mi (0.40-km) buffer from the Dolores River and Calamity Creek should be supported. All water rights associated with the lease tracts should be considered in the PEIS, as well as a requirement for monitoring wells to be established around the perimeter of each lease tract.</p>	<p>Currently, a 0.25-mi (0.40-km) buffer from the Dolores River is being observed as far as the placement of new uranium mining operations on the DOE ULP lease tracts. The analysis for water resources in Chapter 4 focuses on the potential impacts on water quality, since the amount of water needed for the proposed action would be trucked onto the lease tracts and therefore supplied by the vendors used for this service. Requirements for monitoring wells and other requirements will be addressed by DOE and other regulatory agencies as mine plans are submitted for approval.</p>

**TABLE B-2 (Cont.)**

Public Scoping Comment	Rationale
<p>2R. Assess the practice of ore stockpiling at the lease tracts and its impacts. This should include the amount of stockpiled ore, the radioactive and nonradioactive constituents of the stockpiled ore, the estimated length of time the ore will remain at the sites, and environmental impacts.</p>	<p>The ore that would be generated is not expected to be stockpiled for a length of time that would adversely affect human health and the environment. The Colorado Division of Reclamation, Mining, and Safety (CDRMS) has a requirement that ore cannot be stockpiled for longer than 180 days. However, the continual existence of ore stockpiles during active mining operations is to be expected; it gives the mining companies and their ore transportation contractors flexibility to operate in an efficient manner.</p>
<p><b>3. Tribal Concerns</b></p>	
<p>3A. Address any associated environmental and spiritual impacts on all downstream Native American Nations. Must engage in Section 106 consultation.</p>	<p>The consultation with the Colorado State Historic Preservation Officer (SHPO) with regard to cultural resources would be conducted when project-specific information was submitted by the lessees to DOE for review and approval.</p>
<p><b>4. Policy and Regulatory Issues</b></p>	
<p>4A. Adequate nuclear fuel supplies are available for the U.S. nuclear power industry for the foreseeable future. The development of western Colorado uranium reserves should be given a low priority until there is a clear need for a domestic nuclear fuel supply.</p>	<p>DOE has prepared this Draft ULP PEIS consistent with the purpose and need for agency action discussed in Chapter 1.</p>
<p>4B. DOE should collaborate with other agencies, including the CDRMS, BLM, and EPA.</p>	<p>DOE is collaborating with various agencies, including the CDRMS, BLM, and EPA, on this PEIS process. Section 1.9 presents a list of the cooperating agencies and the commenting agencies.</p>
<p>4C. There is a lack of oversight and safeguards, and penalties to companies are not high enough to assure environmental compliance or adherence to current safety laws on reclamation.</p>	<p>DOE's approval of mine plans would be contingent on the fact that these plans contained appropriate and adequate measures for the protection of human health and the environment. The leases specify conditions that must be met by the lessees.</p>
<p>4D. The PEIS is redundant and repeats the efforts of numerous other environmental assessments performed by both private mining companies and governmental agencies in or adjacent to the DOE lease tracts.</p>	<p>DOE has prepared this Draft PEIS consistent with the purpose and need for agency action discussed in Chapter 1. This Draft ULP PEIS addresses the range of reasonable alternatives for the management of the DOE ULP consistent with NEPA requirements.</p>
<p>4E. Local governments requested that affected counties be given an opportunity to meet with DOE separately from the public scoping meetings that were held.</p>	<p>DOE invited the Montrose, Mesa, San Miguel, and San Juan County Commissions to participate as cooperating agencies for the preparation of this PEIS, and they agreed.</p>

**TABLE B-2 (Cont.)**

Public Scoping Comment	Rationale
<p>4F. Requests were received to hold meetings in other locations, such as Cañon City, Gateway, and Grand Junction, as well as with the White Mesa Ute Indian Community and in Blanding, Utah.</p>	<p>Public comment hearings for the Draft ULP PEIS will be held in Grand Junction in addition to Montrose, Naturita, and Telluride, Colorado. It is felt that public hearings at these four locations would provide the interested members of the public adequate opportunities to participate in a meeting format with regard to accessibility of venues and proximity to where interested members of the public reside.</p>
<p>4G. The review and approval process should include a project-specific NEPA review for each proposed mining operation. The PEIS should include site-specific mitigation measures in addition to general mitigation measures.</p>	<p>Section 1.6 of this Draft ULP PEIS contains a discussion of the NEPA process that would be conducted once project-specific mine plans were submitted by the lessees to DOE for approval. Measures that could be implemented to minimize potential impacts are summarized in Section 4.6. Site-specific and project-specific mitigative measures would be specified in the approved mine plans and associated documentation.</p>
<p>4H. Include a history of the compliance of existing lease holders with their lease agreements and applicable statutes and regulations. It should also include DOE or BLM lease and mine inspection reports.</p>	<p>A summary of the mining history that has occurred on the DOE ULP lease tracts is provided in this Draft ULP PEIS in Chapter 1. DOE enforces the requirements stipulated in the leases, and to date, no outstanding issues exist.</p>
<p><b>5. Mining Methods</b></p>	
<p>5A. In assessing the environmental impacts, the PEIS should consider what traditional mining methods or other methods should be used (e.g., should both the in-situ leaching and the in-situ recovery methods be allowed, or should the method used be limited to one or the other?).</p>	<p>This Draft PEIS evaluated underground and surface open-pit mining methods. The in-situ leaching method was not evaluated because it is not considered to be a viable option due to the location of the ore in “dry” sedimentary strata (see 6A below).</p>
<p><b>6. Uranium Resources</b></p>	
<p>6A. Most of the uranium resources in the Colorado Plateau province of western Colorado are located in sedimentary strata, where the distribution of ore is scattered and patchy. This results in large volumes of low-grade radioactive mine waste.</p>	<p>The location of ore described (i.e., in sedimentary strata) is precisely why the underground mining method and, to a lesser extent, the surface open-pit method are more practical methods for extracting the ore. These methods do result in waste rock (material that contains less than 0.05% of uranium) that is partially placed back into the mine workings (if groundwater is demonstrated to be not an issue) or reclaimed as a pile that is contoured to be consistent with its surroundings, covered with available topsoil material, and seeded (or revegetated). This approach has been proven to be an acceptable and protective means of managing the waste rock that is an unavoidable by-product of uranium mining.</p>

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**1 TABLE B-3 Public Scoping Issues Considered To Be Outside the Scope of the ULP PEIS**


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Public Scoping Comment	Rationale
<b>1. Alternatives</b>	
1A. Because of unstable uranium markets and the uncertainty regarding future commercial development of nuclear power facilities, uranium should be preserved for the future use of the American people until it becomes critical for national strategic energy purposes.	The timing for when uranium mining should be conducted for the purposes described does not meet the purpose and need for DOE's action.
1B. Investigate the economic feasibility of renewable and alternative energy development.	The evaluation of renewable and alternative energy development does not meet the purpose and need for DOE's action described in Chapter 1 of this Draft PEIS.
1C. Include an alternative that requires old, inactive, and/or abandoned mines to be reclaimed before new leases are granted or any new mines are established.	DOE has reclaimed all abandoned mines within its purview. The 29 leases that currently exist have been in place since 2008, and all mining activities are currently on-hold until the completion of this PEIS process.
1D. Analyze a no-action alternative that would allow the 1995 leases to lapse with no reclamation conducted.	The option of not performing reclamation when leases lapse or are terminated is not consistent with the requirements of the leases, the ULP, or applicable laws.
1E. Incorporate into the reclamation goals or standards the option of developing brownfields at some mines, so that the reclaimed land can be used for renewable energy production.	The development of brownfields is outside the scope of this Draft ULP PEIS. It does not respond to the purpose and need for DOE's action described in Chapter 1.
<b>2. Impacts Analysis</b>	
2A. Analyze the economic benefits of fully reclaiming and rehabilitating all Federal and state lands in the Uravan Mineral Belt and compare that to the economic benefit of maintaining the existing uranium leases over the next 5 years.	The economic studies suggested are outside the scope of this Draft ULP PEIS. They do not respond to the purpose and need for DOE's action described in Chapter 1.
2B. Analyze the costs to local and state governments to develop and maintain roads and develop and operate other infrastructure to support any future increase in uranium mining and milling activities.	An analysis of the costs to local and state governments to maintain roads to support an increase in uranium mining activities has not been included. However, the evaluation in the Draft ULP PEIS for transportation included discussion on potential traffic congestion, radiological impacts, and accident injuries and fatalities. It does not meet the purpose and need for DOE's action described in Chapter 1.
2C. A market analysis should be conducted to determine how much uranium should be put on the market now versus in the future, when prices might be higher.	Conducting a market analysis to determine the optimal time for uranium ore to be generated relative to uranium ore prices is outside the scope of this Draft PEIS. It does not respond to the purpose and need for DOE's action described in Chapter 1.

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