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**Subject:** AGFD initial comments EIS withdrawal  
**Date:** 03/05/2010 11:35 AM  
**Attachments:** [EIS Alternatives AGFD initial comments\\_03052010.docx](#)

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Scott,

Provided below are comments from the Arizona Game and Fish Department that cover initial concerns and questions related to the withdrawal area, potential effects to wildlife, and the Alternative selection process to date (as far as we understand what has occurred). I have also attached these as a word doc. We appreciate the opportunity to weigh in early in this process.

With respect to uranium mining, the Department's main concerns stem from the potential for increased habitat fragmentation within important wildlife habitat. Uranium mining activities (both exploratory drilling and mine operation) have the potential to affect wildlife directly by displacing wildlife due to mining activity, indirectly by fragmenting intact habitat, and adding toxic materials to the environment.

All three parcels within the footprint of the withdrawal are some of the highest quality, most contiguous habitat occurring statewide. While studies on wildlife habitat loss due to uranium mining activities are limited, it is plausible to broadly compare the effects of uranium mining to effects from oil and gas development, which may be similar in terms of road network development and ground disturbing activities on the landscape. In general, oil and gas exploration disrupt natural migration patterns and encroach on wildlife habitat. The results from one big game study found that when road densities are two miles per square mile, elk are displaced from up to 50% of their habitat. When road densities exceed five to six miles per square mile, elk are unable to use more than 75% of the habitat and may not use any of the potentially available habitat (Lyon 1983). Another study concluded that more than 640 acres of elk habitat can be affected by one mile of road (Perry and Overly, 1976).

Below are some questions and recommendations specific to the Alternative selection process that was used in order to develop the wildlife resource layer:

- How were the species chosen in order to best represent important wildlife values? Some appear to be Threatened and/or Endangered, however others are not? What were the criteria for inclusion for this first broad-brushed approach?
- Because of possible fragmentation issues, the Department recommends a closer look at big game species habitat. Bighorn are neither the only, nor perhaps the most important big game species to consider within the footprint.
- Pronghorn, and to some extent mule deer, are likely effected more by fragmentation than bighorn due to where they occur within the parcels (more broadly) and their response to fragmentation.
- Our Department has provided SWCA both with data from our Heritage Database Management System (HDMS) as well as big game data that could be incorporated into the process for determining important wildlife for consideration.
- In addition to HDMS and big game data, the Department recommends that project personnel consider Arizona Game and Fish Department Species of Greatest Conservation Need (SGCN) data which can be obtained from our office. These are species listed in our State Wildlife Action Plan which broadly represent state species in need based on a criterion of vulnerability and threats.

Where appropriate, the Department would like to weigh in on some of these decisions at the cooperating agency level. Please feel free to contact me with questions that you may have at 928-214-1250 or [arogers@azgfd.gov](mailto:arogers@azgfd.gov)

Thank you for your time

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