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Date: 3/14/06 12:59AM
Subject: No mention of environmental impacts upon adjacent Native American Earthworks in the environmental report of USEC's plan to construct American Centrifuge Plant

To: The Commissioners, Secretary, Atomic Safety and Licensing Board, Federal Preservation Officer and Staff, US Nuclear Regulatory Commission

From: Jeffrey Wilson

Re: No mention of environmental impacts upon adjacent Native American Earthworks in the environmental report of USEC's plan to construct American Centrifuge Plant

Cc: USEC, Advisory Council on Historic Preservation, National Park Service, Ohio Historic Preservation Office, Federal Preservation Officer of the Department of Energy, National Trust for Historic Preservation, Heritage Ohio, Ohio Preservation Alliance, Archaeological Conservancy, National Association of Tribal Historic Preservation Officers, Absentee Shawnee Tribe, Native American Alliance of Ohio, Ohio Historical Society, CERHAS, Thomas King, Jarrod Burks, Robert Horn, Kathy and Richard Southworth, Charles Beegle and others.

Date: March 13, 2006

Having recently (March 10) been made aware of the rediscovery of the "Alembic" Native American earthworks in Scioto Township (referred to by Squier and Davis on Plate 24 in their Ancient Monuments of the Mississippi Valley, and as they are a contiguous, historical and integral part of the Scioto Township Works listed on the National Historic Register), I was shocked to hear of its' adjacency to the US Nuclear Reservation, and furthermore of the United States Enrichment Corporation's (USEC) plan to construct a new uranium enrichment facility (American Centrifuge Plant) which has the potential to detrimentally impact this important archaeological site.

After I was made aware of the archaeological re-discovery, and USEC's construction plans, I went online to the Nuclear Regulatory Commission's website to read the environmental impact report, and was disappointed to read that no specific consideration or assessment has been conducted as to the environmental impact of USEC's new ACP plan on the newly re-discovered "Alembic" earthworks. This unique and culturally important Native American earthworks site lies about 7/10ths of a mile from the front gate of the US Nuclear Reservation, and lies only feet away from the dedicated OH-23 highway exit lane to that gate's entrance where (according to the projections included in the environmental report) approximately 8,300 semi trucks, each carrying tons of radioactive uranium hexafluoride "feed" and radioactive waste will be driving past each year. Yet despite all those heavy trucks driving literally within feet of the fragile earthwork structure, no mention of

any potential impact was made in the environmental report. (See map below.)

I am also concerned about the continuing environmental impact from the US Nuclear Reservation (which was also unaddressed in the environmental report) upon the larger Scioto Township Works (Square and Circle) which lie only 1.09 miles from the front gate, but where a drainage area leading from the Reservation property flows directly between the Square and the Circle earthworks. In the 1840's when Squier and Davis surveyed the earthworks, the drainage area was approximately 15 feet deep. As a result of the excessive runoff from the Reservation over the past few decades, that little trough has now become a gaping, impassable 40 foot deep gorge, and is seriously beginning to erode the earthworks' remaining structure. Again, no mention was made of this critical environmental impact, despite USEC's plan to site its' new plant even closer to the earthworks than any of the other existing structures on the Reservation. This will undoubtedly increase the runoff in the direction of the earthworks, hastening the damage.

I am very concerned at the way USEC seems to have mis-represented the status of their plan to the Ohio Historical Preservation Office (see letters in Appendix B of the environmental report), whereby they claim "The proposed action...should not result in any additional impact to Native American Indian tribal, religious, or cultural sites. The above information clearly shows this USEC statement to be negligent at best. Even after the OHPO requested additional information on the project, USEC declared that there would be no impact to archaeological sites within the boundaries of the Reservation, but conveniently left out any possible impact to archaeological sites adjacent to or located nearby the Reservation that will be impacted. Perhaps OHPO did not realize how close these archaeological sites were to the Reservation, or how the proposed ACP would impact them - but no wonder, considering USEC's lack of provided information detailing their proximity. Still, OHPO reminded USEC of its responsibilities under Section 106 of the National Historic Preservation Act, and again made them aware that adjacent sites may be impacted. But again, no mention was made of these potential impacts to these unique, important pre-historic Native American structures in the environmental report. It does not appear as if any archaeologists visited the site to inspect the area before the report was filed, and a lack of specific information was presented by USEC in the consultation with OHPO, leaving OHPO with concerns about the process which seem to have been ignored. I wonder too, why the archaeologists at the nearby National Park Service's Hopewell Culture National Historic Park, located just 25 miles to the north of this site, who are clearly experts on these types of earthwork structures, were not consulted as part of this review. Those archaeologists would clearly have a consulting interest here. I would suggest that the National Park Service's nearby archaeologists be contacted and made consultants to this review process, which I am certain, they would be most interested in.

It is my understanding that at least one Native American burial mound was destroyed in the original construction of the Reservation facility some decades ago, and I am very concerned that more Native American earthwork structures may be irreparably damaged with the construction of USEC's new American Centrifuge Plant. It appears that from the online-published draft of the environmental review that a critical lack of assessment was conducted in regards to the historically and culturally important Scioto Township Works (Seal) listed on the National Historic Register, and with the newly rediscovered "Alembic" earthworks which were historically regarded as being a contiguous part of the Scioto Township Works. These structures are already in a fragile state. It is critically important to carefully assess what impact the nearby construction and operation of a heavy-industrial factory will have on these earthworks.

It is my understanding that the draft period of the environmental review is immediately ending, so I am asking the commissioners to please carefully take the time to consider extending the environmental impact assessment period to allow for a complete evaluation of the potential damage this new facility may cause to the Scioto Township and "Alembic" Earthworks. These ancient earthworks represent some of the highest achievements of American culture from pre-historical times, and which may include solar, lunar, and other astronomical alignments, as well as incorporating additional spiritual significances which should be paid particularly appropriate attention. These achievements should be something every American citizen should be proud of, and want to defend and preserve. Once gone, they cannot be replaced. It is critically important that the proper time be taken and evaluation be conducted to preserve and protect these wonderful monuments.

Thank you for your consideration!

Sincerely,

Jeffrey Wilson

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Attachment: Map of Scioto Township Works and "Alembic" Earthworks site

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