

From: Cynthia Knuth Fischer <cknuth@aol.com>
To: <NRCREP@nrc.gov>
Date: 8/29/2007 9:30:53 PM
Subject: Uranium Recovery GEIS

To Whom It May Concern:

I am responding to the U.S. Nuclear Regulatory Commission's Federal Register notice dated July 24, 2007 regarding the scope of the proposed Generic Environmental Impact Statement ("GEIS") for in situ leach ("ISL") uranium mining.

I write to oppose a Generic Environmental Impact Statement (GEIS) for in situ leach uranium mining. The reasons are many.

First, there was no public input about whether a GEIS is needed or desirable.

Only two public meetings have been scheduled - one in Casper, Wyoming and one in Albuquerque, New Mexico.
Neither of these communities is the site of any proposed ISL mining operations.

Second, communities that face proposed ISL mining such as Grants, Gallup, Crownpoint and Church Rock, New Mexico, have been ignored. The NRC has also ignored entire states, such as Utah, Arizona, Colorado and South Dakota where ISL mining is proposed.

The NRC should extend the comment period and schedule public meetings in communities that will be affected by ISL mining.

Third, if the NRC has concluded, as it appears, that a GEIS should be drafted, its scope should be very limited. ISL mining is inherently constrained by site-specific considerations. To conclude that the hydrology, water quality, geology, socio-economics, and cultural resources in places as diverse as northwest New Mexico and south Texas - where ISL mining is ongoing and proposed - can be evaluated in a generic manner is absurd on its face. These issues can only be evaluated on a site specific basis with a site specific environmental impact statement.

Relegating these important site-specific issues to evaluation in an environmental assessment ("EA") is unacceptable because public participation and environmental analysis requirements under the National Environmental Policy Act are much less stringent for EAs than for EISs. Because the site specific issues are so central to assessing the environmental impact of proposed ISL operations, meaningful public participation and a rigorous environmental analysis are critical. Such issues should not be left for an EA.

Sincerely,

Cynthia Knuth Fischer
Center for Environmental Education
956 Conner Road
West Chester, PA 19380

610-696-1324

Federal Register Notice: 72FR40344
Comment Number: 147

Mail Envelope Properties (4741AC4D.HQGWDO01.TWGWPO03.200.200000A.1.15C5FA.1)

Subject: Uranium Recovery GEIS
Creation Date: 8/29/2007 9:30:53 PM
From: Cynthia Knuth Fischer <cknuth@aol.com>

Created By: cknuth@aol.com

Recipients
<NRCREP@nrc.gov>

Post Office
TWGWPO03.HQGWDO01

Route
nrc.gov

Files	Size	Date & Time
MESSAGE	2266	8/29/2007 9:30:53 PM
Mime.822	3405	11/19/2007 3:31:25 PM

Options
Priority: Standard
Reply Requested: No
Return Notification: None
None

Concealed Subject: No
Security: Standard