

**From:** Dick Artley <dartley@connectwireless.us>  
**To:** <NRCREP@nrc.gov>  
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**Subject:** Uranium Recovery GEIS

To Whom It May Concern:

These comments are in response to the United States Nuclear Regulatory Commission's notice in the Federal Register of July 24, 2007 asking for public comments on scope of their planned Environmental Impact Statement they will be preparing.

I am a retired forest planner and NEPA document legal compliance reviewer for the Nez Perce National Forest. I taught the Forest Service 1900-1 course - Beginning NEPA.

The NRC says they will develop a Generic Environmental Impact Statement (GEIS) for in situ leach uranium mining to apply every where this mining process will be used.

The Forest Service does not use the term "Generic Environmental Impact Statement." Instead, we use programmatic EIS to apply to similar actions occurring in different locations.

The Forest Service understands that programmatic (and generic) EISs may be used in very special cases where:

- 1) the potential environmental impacts are minor,
- 2) the location of the action is insignificant in determining the environmental effects.

The very essence of the NEPA is site specificity.

Clearly this GEIS is illegal before the first word is printed. For any (emphasis added) uranium mine, neither #1 or #2 are even partially satisfied.

The NEPA spells out the proper way to handle this action, yet the NRC ignores it.

How?

Prepare a separate EIS for each in situ leach uranium being proposed.

Please keep me informed about further developments relating to the GEIS.

Sincerely,

Dick Artley

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