From: Rose Chilcoat <chilcoat@frontier.net>
To: <NRCREP@nrc.gov>
Date: 8/31/2007 5:28:14 PM
Subject: Uranium Recovery GEIS

To Whom It May Concern:
As someone who lives in an area that has seen Uranium exploration and exploitation before, 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 strongly oppose a GEIS and the reasons are many.

First, the NRC totally failed to get public input as to the need and appropriateness of a GEIS. The site-specific nature of in situ leach mining operations and how the impacts might play out depending on a myriad of factors means that a GEIS would simply be an industry gift to eliminate any close looks at real on the ground environmental impacts. If the idea is to expedite the ISL licensing process while ignoring the requirements of NEPA and the health of our land, water, and its inbabitants then you will succeed!

Second, the scoping process itself has been deeply flawed since only two public meetings have been scheduled on this matter - one in Casper, Wyoming and one in Albuquerque, New Mexico and neither of these communities is the site of any proposed ISL mines. Communities that face proposed ISL mining such as Grants, Gallup, Crownpoint and Church Rock, New Mexico, were ignored. Additionally, the NRC has ignored entire states, such as Utah, Arizona, Colorado and South Dakota, where ISL mining is proposed and could have devastating negative impacts.

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

A special meeting with the National Mining Association was held in Washington, D.C. What about having special meetings with the environmental opposition instead of those most likely to benefit from the GEIS?

Third, if the NRC has concluded, as it appears to have already done, 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.

Finally, relegating these important site specific issues to evaluation in an environmental assessment ("EA") is unacceptable. The 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. In fact, in the August 13, 2007 issue of the Gallup Independent, the NRC's Office of Federal and State Materials and Environmental Management Programs Branch Chief Gregory Suber stated that "the potential for fewer public meetings is there" with the EA process.

The potential for proliferation of Uranium Mining with significant environmental and socio-economic impacts cannot be over-stated or ignored. Please do what the American people want...examine all the potential impacts of these proposed actions on a case by case, location by location basis. It is our lives and communities that are at risk.

Thank you for the opportunity to comment.

Sincerely,

Rose Chilcoat
2914 Junction St
Durango, CO 81301

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