



Broad Scenic River Advisory Council

c/o SC Department of Natural Resources, Land, Water, and Conservation Division.
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May 21, 2008

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
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U.S. Nuclear Regulatory Commission
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RULES AND DIRECTIVES
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REF: *Comments for EIS concerning the Lee Nuclear Station near the Broad Scenic River, in Cherokee County, SC*

US NRC Chief:

The Broad Scenic River Advisory Council is chaired by a staff person with the South Carolina Department of Natural Resources and is composed of riparian landowners along the Broad River. Many of the Ex-Officio members are concerned citizens and technical experts in history, recreation or a natural resource field. A Duke Energy representative is a member of this council and is performing an educational roll for this issue. The Duke Energy representative has recused herself during any voting concerning this issue.

The Broad Scenic River Advisory Council was asked by local landowners to comment on a proposed project concerning potential impacts to the Broad Scenic River and the watershed area surrounding this river. We are tasked with the conservation of unique or outstanding scenic, recreational, geologic, botanical, fish, wildlife, historic or cultural values of the scenic section of the Broad River and to make public comment if we perceive a development project will have an impact to the river. The Broad River is a beautiful piedmont river shouldered by a ribbon of relatively undisturbed riparian vegetation. This scenic and undeveloped land provides high quality habitat for a variety of plant and animal species including some rare, threatened and endangered species such as drooping or rough sedge and the bald eagle. Canopy species along the Broad Scenic River include sycamore, river birch and sweetgum.

The proposed project may include destroying vegetation near the river and surrounding areas in order to place transmission line corridors and buildings associated with the construction of a nuclear power station. This proposed project would impact the Broad Scenic River so we are offering the following comments:

1) Forested uplands draining into the river floodplain and riparian areas perform numerous wildlife habitats, hydrologic, and water quality functions that provide significant and well-documented public benefits. Additionally, floodplains and riparian

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E-REDS = ADM-03
ADD = L. Tello (LMT2)

areas can help to alleviate downstream flooding. Most importantly to a scenic river they are the reason it was declared scenic. If the upland forests are removed to provide area for transmission line corridors and structures the scenic viewshed could be affected. In order to improve and minimize impacts to this scenic viewshed, we recommend placing the transmission line structures and corridor away from the river where the natural ecosystem and viewshed disturbance will be less of an impact to the river.

2) We would also like to recommend that all the storm water and runoff from any development or construction be collected and filtered/treated before it is allowed to enter the riparian areas of the Broad River or the Broad Scenic River.

3) We are also concerned with the fauna and aquatic fauna of this river and would ask that the thermal water aspects of this project be studied and included in the environmental impact study document. We recommend further analysis for potential impacts to the flora and fauna of the river ecosystem, especially any impacts to rare, threatened and endangered species.

4) We are also concerned with possible economic or cumulative effects growth and/or development to the currently rural areas of the county and around the river this project may bring. This project may cause further development around the river in the form of housing subdivisions and infrastructure which may impact the scenic viewshed and environmental health of the river. We ask that you study these impacts and include them in your document.

5) We are also concerned about the amount of water needed to run and shutdown the proposed facility and would want to read about a water supply study and plan for low water periods.

6) We are enclosing a copy of our published management plan to help you in your assessment of this project.

We are concerned about the above listed impacts and offer these suggestions to help you with your environmental impact study. We look forward to working with all agencies, industries and individuals involved.

Sincerely,

Mary Crockett
Chairperson

Cc: Bill Marshall
Advisory Council Members