

URGEISCEmails

From: Nancy Hilding [nhilshat@rapidnet.com]
Sent: Friday, November 07, 2008 11:55 PM
To: NRCREP Resource
Subject: "Uranium Recovery GEIS" -- Comment from PHAS
Attachments: %GEIS commentsdoc.doc; %GEIS commentsdoc.rtf

Nancy Hilding
President
Prairie Hillls Audubon Society
P:.O.Box 788
Black Hawk, SD, 57718
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[Nancy Hilding](#)
[6300 West Elm](#)
[Black Hawk, SD 57718](#)

[November 7, 2008](#)

[Michael Lesar](#)
[Chief, Rulemaking, Directives and Editing Branch](#)
[U.S. Nuclear Regulatory Commission](#)
[Mail Stop T6-D59](#)
[Washington, DC 20555-0001](#)
NRCREP.Resource@nrc.gov

[RE: Draft Generic Environmental Impact Statement for In-Situ Leach Uranium Milling Facilities, NUREG-1910](#)

[Dear Mr. Lesar,](#)

[Thank you for the opportunity to submit comments on the draft Generic Environmental Impact Statement \(GEIS\) for In-Situ Leach \(ISL\) Uranium Milling Facilities.](#)

[The GEIS is in fact "generic" and in no way meets either the Council on Environmental Quality's regulations or NEPA requirements for programmatic analysis. It does not meet the cumulative impact analysis required by NEPA/CEQ regulations. It is not specific enough to be a project level EA or a programmatic document. It does not have an adequate range of alternatives. We fear that the NRC has created a bogus concept of "generic" EIS to short change the NEPA process and in the future will use tiering to inappropriately hinge future in situ leach mining NEPA documents to this flawed NEPA process, thus short changing the public of a proper NEPA process.](#)

[We request that you withdraw this document and cease to use GEIS to avoid proper NEPA Analysis. We hope you follow the APA notice and comment rulemaking to adopt regulations.](#)

Sincerely,

Nancy Hilding
Nancy Hilding, President, Prairie Hills Audubon Society

--
Nancy Hilding
6300 West Elm
Black Hawk, SD 57718

605-787-6779 phone best to call me on
605-787-6466 phone and fax and voice mail and internet hook up
I have call waiting and "no answer" may mean both "land lines" in use

(call before faxing)

cell phone 605-430-9230, I don't check cell messages regularly, thus do not rely on for ASAP calls

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Federal Register Notice: 73FR43795
Comment Number: 1302

Mail Envelope Properties (p06240802c53acb8eef8e)

Subject: "Uranium Recovery GEIS" -- Comment from PHAS
Sent Date: 11/7/2008 11:54:45 PM
Received Date: 11/9/2008 12:08:32 AM
From: Nancy Hilding

Created By: nihilshat@rapidnet.com

Recipients:
"NRCREP Resource" <NRCREP.Resource@nrc.gov>
Tracking Status: None

Post Office: [208.34.15.43]

Files	Size	Date & Time
MESSAGE	2017	11/9/2008 12:08:32 AM
%GEIS commentsdoc.doc	46434	
%GEIS commentsdoc.rtf	6880	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

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