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George A. Harper
Vice President, Engineering
Eagle Rock Enrichment Facility
AREVA Enrichment Services LLC
400 Donald Lynch Boulevard
Marlborough, Massachusetts 01752

re: Class III Cultural Resource Inventory of the Proposed Eagle Rock Enrichment Facility, Bonneville County, and amendment;

September 29, 2009

Dear Mr. Harper:

Following up on our meeting on September 10, subsequent phone calls with Stacy Thompson, my earlier inspection of the project area last September with Ed Stoner and Tom Lennon of WRCM, Inc., and my review of the reports referenced above, we offer the following comments and recommendations.

Idaho SHPO concurs with the evaluations and recommendations in the two reports. We agree that site MW004, the John Leopard homestead, is the only one of the 13 sites located in the project area eligible for nomination to the National Register.

Although the proposed cylinder storage pad/stormwater retention basin will impact all of Locus 2 of site MW004, including the cistern designated Feature 1, and the pit depression mapped as Feature 2, we think these features have been adequately addressed. No further work is recommended for Locus 2.

However, the proposed footprint of the electrical switchyard will impact the depression/dugout/privy complex mapped as Features 1, 8, and 7 in Locus 1, as well as the cistern (Feature 2). Here we recommend mitigation of these adverse affects through data recovery. This should include surface sampling the Feature 8 refuse concentration for material culture of educational and interpretive value for the final report and the planned public interpretive exhibit. In addition, the suspected privy depression should be tested through subsurface excavation of a square meter unit taken to the appropriate depth, with follow-up data recovery excavation if more is warranted. Finally, the dugout depression should be excavated with a trench that cross-sections the depression. It should be at least 6 meters in length but need not exceed one meter in width. The total volume represented for the trench is probably less than three cubic meters.

We also recommend historic research for the John Leopard homestead in order to understand the property in the context of the region's pioneer Mormon irrigation districts, and the subsequent Federal irrigation initiative driven by the Carey Act of 1894. The research should include local archives in Idaho Falls and the Public Archives and Research Library unit of the Idaho State Historical Society in Boise.

Finally, we recommend that all obsidian bifacial tools within the project area be chemically traced to their geological sources through x-ray fluorescence analysis. The resulting data points will contribute usefully to regional modeling, and should have educational value for the planned public interpretation facility.

These mitigation measures should be drafted as stipulations in a Memorandum of Agreement. The MOA will be reviewed and signed by the Nuclear Regulatory Commission and the Idaho SHPO. AREVA will sign as a concurring party.

Thank you for the opportunity to comment on this project. We appreciate the efforts AREVA Enrichment Services is making to minimize potential impacts to Idaho's heritage, and the fine job the WRCM, Inc. team has done with their reports and recommendations.

Sincerely,

Kenneth C. Reid, Ph.D.
State Archaeologist and Deputy State Historic Preservation Officer
Idaho State Historic Preservation Office
210 Main Street
Boise, Idaho 83702

cc Suzi Pengilly
Andrea Koch

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