



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Upper Snake Field Office
1405 Hollipark Drive
Idaho Falls, Idaho 83401
(208) 524-7500

In Reply Refer To:
1610-LLIDI01000

August 20, 2010

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administrative Services
Mailstop TWB-05-B01M
Washington, DC 20555-0001

7/21/2010
75 FR 42466
(3)

RECEIVED

2010 AUG 25 PM 2:22

RULES AND DIRECTIVES
BRANCH
TRANSIC

Re: Eagle Rock Enrichment Facility, Bonneville County, Idaho

Enclosed please find our comments on the Draft Environmental Impact Statement for the Eagle Rock Enrichment Facility. Please contact Mark Ennes, Idaho Falls District NEPA Coordinator at (208) 524-7526 if you have any questions.

Thank you for the opportunity to comment on this proposed action.

Sincerely,

Wendy Reynolds
Field Manager

Cc: Mark Ennes, District NEPA Coordinator
Becky Lazdauskas, Realty Specialist

SOUSI Review Complete
Template = ADM-013

E-RFDs = ADM-03
Call = S. Lemort (5XL8)

Comments and questions on the DEIS for the Eagle Rock Enrichment Facility in Bonneville County, Idaho.

1) A reading of the draft document makes clear that one criterion used to select the enrichment facility site was the presence of a redundant electrical power supply. It is further presented in Table 2-3 that the Bonneville County site passed Phase I screening indicating that there is a redundant power source available for the plant. However, the potential environmental impacts of the construction and use of a redundant power supply is not discussed under **Utilities** (2.1.3.2) (under the Proposed Action), nor is it discussed in the **Environmental Impacts** section of the document. The construction and use of a redundant power source is not considered as a reasonably foreseeable future action under the cumulative impacts section either.

These facts lead the BLM to ask: Is a redundant source of electrical power a requirement of the plants operation? If so, where would the redundant source come from? As you know, areas to the west of the plant (where a potential source of redundant power is available) are managed by the Idaho National Laboratory (INL; Department of Energy). Non-mission essential rights-of-way (ROWs) on these lands are administered by the BLM, Upper Snake Field Office. Does AES have future plans to route a redundant transmission line across INL and BLM-administered lands?

2) While the BLM has commented on the reduction of the visual quality of the area as a result of the construction and operation of the facility (Boggs, 2010), the BLM would like to add clarity to the nature of recreational impacts as it concerns the Hell's Half Acre WSA. First, the camping area described in the DEIS is not within the WSA itself. The proposed facility would be seen from this area (particularly at night), however, so from a recreational standpoint a more appropriate impact analysis might read, for example, "The construction and operation of the proposed facility would reduce the quality of the recreational experience for campers at the Hell's Half Acre trailhead".

Second, Mr. Boggs indicates that the proposed facilities would be seen from certain areas of the Hell's Half Acre WSA (particularly from the northern end of the hiking trail). Because these areas are within the WSA itself, there would be adverse impact on wilderness values associated with the implementation of the proposed action. The analysis in this case could read, for instance, "The construction and operation of the proposed facility would have an adverse impact on wilderness values because opportunities for solitude would be reduced due to the facility being within sight of users of certain areas of the WSA. The impact would be greatest at night when artificial lighting is in use". The BLM agrees with the characterization of these impacts as MODERATE.

3) The BLM appreciates the lengthy and thorough discussion of the greater sage grouse, particularly in the affected environment section of the document. In terms of the analysis, however, there is no discussion of impacts to the greater sage grouse from the operation of the plant. Here too, as with the impacts from preconstruction and construction activities, the greater sage grouse would likely avoid the area due to human presence, noise, and the use of artificial lights resulting in habitat displacement over an area substantial larger than the footprint of the

facility itself. Further, indirect impacts would occur once the boundary fence is in place. Greater sage grouse are known to collide with the top wire of fences like the fence proposed to encircle the AES property. Such collisions are known to be a source of mortality amongst local and regional sage grouse populations. In view of this fact, the BLM requests that AES place metal reflectors on the top wire of the fence. This mitigation measure has been shown in recent preliminary and, as of yet, unpublished studies to reduce the probability of sage grouse colliding with fence, thus reducing mortality.

4) The BLM would also like to express some concerns with the cumulative impact analysis section of the document. The NRC is correct in citing the regulations at 40 CFR§ 1508.7 for the definition of what a cumulative impact is and in discussing the fact that ROI's (we assume this is equivalent to a cumulative impact assessment area) can, and most likely, would be different for each resource affected.

The primary concerns from the BLM's point of view is that the ROI's are not defined for each resource, a cumulative impact baseline is not established for each ROI, and there is relatively little discussion of past, present and reasonably foreseeable future actions that may contribute to cumulative impacts (particularly for past actions). Although in some cases past and present actions and their impacts are discussed (although the intensity of the impact is not), the emphasis seems to be on the reiteration of the direct and indirect impact presentation. Further, a cumulative impact analysis should be conducted for each resource affected by the proposed action and no action alternative, which is not evident in this section (for additional guidance, please refer to the Council on Environmental Quality's [CEQ's] 1997 publication, *Considering Cumulative Effects Under the National Environment Policy Act*). The BLM also offers the following, more specific inquiries for your consideration:

What would be the cumulative impact to sage grouse from the implementation of the Proposed Action and No Action alternative? How long would the effects last?

What would be the incremental impact on air quality, soil resources, vegetation, wildlife and grazing livestock from periodic releases of small amounts of UF₆ over the thirty year life of the facility?

What would be the cumulative impact of greenhouse gases emissions associated with the operation of the facility on air quality and climate change over the thirty year period?

If you have any questions with regard to these comments and questions, please do not hesitate to call.