

From: [Moore, Johari](#)
To: ["Ben Schiffer"](#)
Cc: [Bjornsen, Alan](#); ["Melissa Butcher"](#); ["Mike Butcher"](#); ["Mal James"](#); [Waldron, Ashley](#); [Davis \(FSME\), Jennifer](#)
Subject: RE: Ross ISR Project, Section 106 Conf. Call
Date: Wednesday, January 18, 2012 5:52:00 PM

Hi Ben,

During our previous phone conversations, I believe I was clear and you understood that I would be placing Mike's recent email along with the attachment into ADAMS. I apologize if I was somehow unclear. Please know that, in general, I will need to place a copy of our correspondence into ADAMS for public inspection per 10 CFR 2.390. If you submit sensitive information that meets the criteria for withholding, please mark it accordingly. If you recall, we discussed whether the draft RFP was proprietary and I believe you indicated that it is not.

Thank you for providing additional information regarding the basis for the 2-mile buffer used in your visual resource analysis. As we are in the process of finalizing our APE determination, this information will be useful.

I will follow up with details regarding a call next week. I appreciate you indicating that Thursday is also an option.

Thanks,

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From: Ben Schiffer [mailto:bschiffer@wwcengineering.com]
Sent: Wednesday, January 18, 2012 4:48 PM
To: Moore, Johari
Cc: Bjornsen, Alan; Melissa Butcher; Mike Butcher; Mal James
Subject: Ross ISR Project, Section 106 Conf. Call

Johari--

Thanks for the call today. A couple of things, first, we are concerned that placing the draft RFP on ADAMS will prompt premature responses to the RFP. We had anticipated obtaining suggested changes to the RFP from NRC staff prior to public review. Second, in regards to the proposed viewshed APE. The visual resource analysis provided in the ER Chapter 3.9 was utilized as a basis for a second potential APE in the draft RFP. The analysis used the

BLM Visual Resource Management (VRM) system, a commonly used tool for inventorying/evaluating scenic quality. Figure 3.9-3 of the ER and Figure 3 of the draft RFP depicts the Ross Project and a 2-mile buffer around the project where visual impacts would be most pronounced within a Class III Visual Resource Area. The buffer, while far from arbitrary, was more a common sense line utilized to indicate the point where visual impacts from the project would be most pronounced. Outside of the 2-mile buffer, little of the project would be observable and if it was, it would be difficult to discern what was occupying the area. Notice that the Ross Project is well outside of the Class II Visual Resource Area surrounding the Devils Tower National Monument. With that in mind, what justification could there be for going beyond the 2-mile buffer for a viewshed APE? If the project can't be seen beyond the 2-mile buffer how could it impact a potential historical site? We have yet to hear any justification for the viewshed APE, let alone one that goes beyond where the project will be visible. It might ruffle some eagle feathers but as the lead agency this is well within your realm of decision making. As you can guess, we would very much like to limit the scope of this additional cultural resources analysis and we believe strongly that a viewshed APE is unnecessary particularly one that goes beyond where the project might be visible. Finally, we look forward to discussing the draft RFP with you and your team on Thursday, January 26. Take care.

Ben

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