



February 10, 2012

Ms. Haimanot Yilma
United States Nuclear Regulatory Commission
Mail Stop: T-8F5
Washington, DC 20555-0001

SECTION 106 PROJECT CONSULTATION – IDENTIFICATION/EVALUATION

Project: Dewey-Burdock Uranium Project
Location: Multiple Counties
(NRC)

Dear Ms. Yilma:

Thank you for the opportunity to comment on the above referenced project pursuant to Section 106 of the National Historic Preservation Act of 1966 (as amended). The South Dakota Office of the State Historic Preservation Officer (SHPO) received the following reports prepared by Archeology Laboratory, Augustana College:

- “A Level III Cultural Resources Evaluation of Powertech (USA) Incorporated’s Proposed Dewey-Burdock Uranium Project Locality within the Southern Black Hills, Custer and Fall River Counties, South Dakota,” Volume I, Volume II, Volume III, Volume IV, Volume V, Addendum 1 – Volume 1 and Volume 2, Addendum 2 – Volume 1 and Volume 2.
- “Evaluative Testing of Four Sites within Powertech (USA) Incorporated’s Proposed Dewey-Burdock Uranium Project Locality, Southern Black Hills, Custer and Fall River Counties, South Dakota,” Volume 1 and Volume 2.

After reviewing the above reports, we request the following information be submitted so we may continue our review of this project. The following questions are from the report entitled “A Level III Cultural Resources Evaluation of Powertech (USA) Incorporated’s Proposed Dewey-Burdock Uranium Project Locality within the Southern Black Hills, Custer and Fall River Counties, South Dakota,” Volume I-V.

- According to the report the Area of Potential Effects (APE) is defined “as all potential work areas, including proposed drill sites, access roads, and additional facilities sites, comprising the Dewey-Burdock Uranium Project. However, the APE should include the geographic areas within which the development may directly or indirectly cause alterations in the character or use of historic properties, if any exist. The APE should take into consideration visual and atmospheric effects as



well as the physical foot print of the project. Please explain if the APE has been modified since the identification and evaluation of properties.

- On page 4.9 under the heading Project Objectives, in the first bullet, please explain the reference to “ACHP 2006”. It is unclear what document this is referencing.
- Page 4.16 please explain where the collected artifacts will be housed.
- Page 5.92 (39CU3561), please explain the reference to “NPS 199 1:37”.
- Page 5.110 (36CU3566), explain if this site is associated with a farmstead.
- Page 5.298 (Site 39CU3619), please provide National Register assessments for standing structures CU002500002, CU02500003, and CU02500004. Please be sure to use structure forms for all standing architectural resources.
- Page 6.82 (Site 39FA778), explain if a site map was produced for this site? Were any county records searched to determine previous property owners? How was National Register Criteria D applied with no subsurface testing?
- Page 6.303 (Site 36FA1923), provide pictures of the monument. Explain why the monument needs to be avoided.

Addendum 2, Volume 1

- Page 73 (Site 39FA1952), explain the difference between partially eroded and partially intact. Can a percent of degradation be given to these features?
- The report discusses an historic district (90000949), this appears to be an incorrect structure number, please clarify.

In General:

- Given the number of properties located during the survey, is it possible to address any specific research theme?
- Were any of the identified properties evaluated in the context of a district, if not, explain why?
- What role does the landscape play in the location of the identified properties?





- A number of sites have been determined not eligible for listing on the National Register of Historic Places under National Register Criteria D, please explain if Criteria A will be apply.
- Please explain how site types were established as the use of “artifact scatter” and “isolated find” appear to be interchangeable in the survey reports. Please note that the Archaeological Research Center (ARC) has defined an artifact scatter as “lithic scatters chipping stations, etc. Generally thin deposits can be buried; can include aboriginal or historic material,” and an isolated find as “single tool or few (n.<10) items with no possibility of buried or other remains; can be aboriginal or historic; is not eligible by definition”.

Should you require additional information, please contact Paige Olson at (605) 773-6004. We appreciate your concern for the non-renewable cultural heritage of South Dakota.

Sincerely,

Jay D. Vogt
State Historic Preservation Officer

Paige Olson
Review and Compliance Coordinator

