

Gallagher, Carol

From: Jones, Robert G [RobertJones@MissouriState.edu]
Sent: Monday, January 07, 2013 5:00 PM
To: Gallagher, Carol
Subject: NRC-2012- 0277

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11/26/2013
77 FR 70456
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Dear Ms. Gallagher –

I am writing this as a concerned citizen. I am very aware of the energy needs of our country, having served on the steering committee for the National League of Cities Energy, Environment, and Natural Resources Committee. I am also very proud of our City-owned utility in Springfield, MO, over which I helped to govern during my time as City Councilmember. So, I am reasonably well-informed about the various perspectives on the proposed Dewey-Burdock uranium mine.

I am writing this to provide a couple of criticisms of the Environmental Impact statement for this project. Specifically, the designation (p. 2-67) of the "Environmental Justice" and "Waste Management" impacts of the project as "SMALL" is egregious, in my view. First, the project is proposed for an area that is of great cultural significance to a stakeholder group that has notoriously been excluded from government decisions. I suspect that the "SMALL" designation would not be supported by many of the people who live on nearby reservations and who were forced out of the sacred lands surrounding the proposed project. Because of their historical exclusion, I believe it is ethically essential that the agency proactively engage in a more thorough discussion with affected groups, rather than relying on "comment periods". Ethical expectations for historically excluded stakeholders are included in the Federal Register (see "Belmont Report") and should be consistent with modern ethical theories (see Phillips, 2003).

Second, the "SMALL" designation belies a lack of consideration of specific anchors for this scale. For example, future inhabitants (stakeholders without voices) will be left to deal with tons of wastes that could be entirely avoided by distributed energy generation. If such energy production processes were included on the continuum of "SMALL to LARGE", most reasonable people would argue that large scale uranium mining would not belong on the "SMALL" end. I believe that this belies serious bias on the part of those who wrote the report.

I respectfully request that 1) the report be amended after further, proactive discussions with stakeholders, 2) that scales be adequately defined and anchored, then the ratings in the report re-assessed, and that 2) people with greater knowledge of history and culture of this region be directly solicited with respect to cultural heritage impacts. I also respectfully request that Cindy Bladely be copied on this, since there was no email address provided.

Sincerely,
Bob Jones

Robert G. Jones, PhD
Professor
Department of Psychology
Missouri State University
901 South National Avenue
Springfield, MO 65897
417-836-8439

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