

From: [Waldron, Ashley](#)
To: [Waldron, Ashley](#)
Subject: RE: Request for Section 106 Jane Dough site visit
Date: Monday, July 11, 2016 2:28:36 PM
Attachments: [image001.png](#)

From: Waldron, Ashley
Sent: Friday, July 01, 2016 8:38 AM
To: 'Dawn Kolkman' <dkolkman@energyfuels.com>
Cc: Brown, David <David.Brown@nrc.gov>; Caverly, Jill <Jill.Caverly@nrc.gov>
Subject: Request for Section 106 Jane Dough site visit

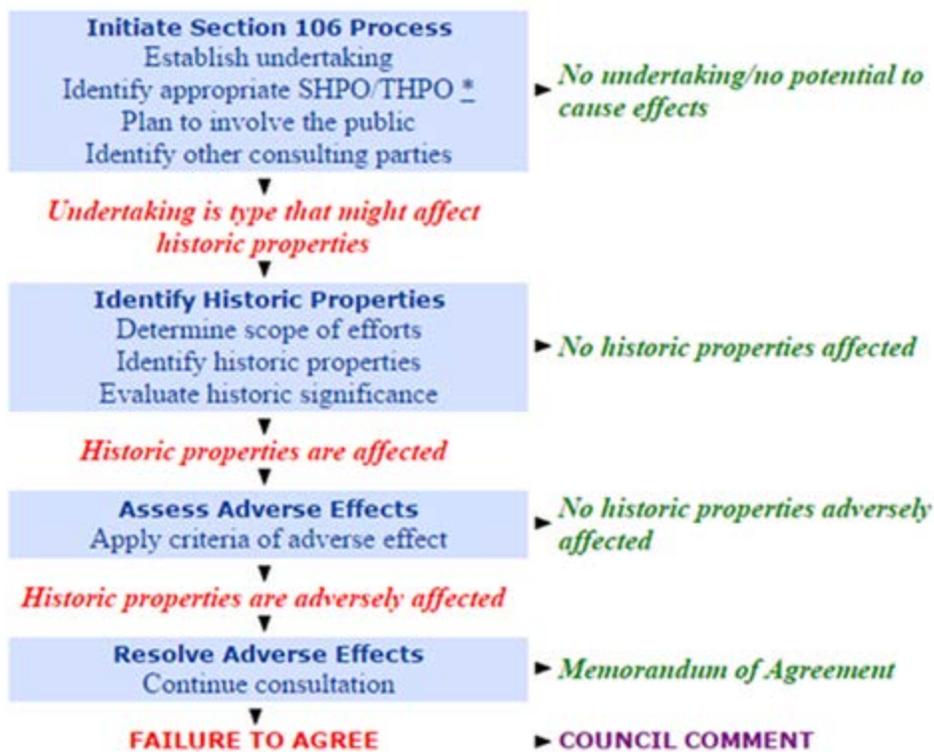
Dawn,

During our telephone conversation on June 30, 2016, you requested in writing NRC staff's request for a Section 106 site visit for the Jane Dough license amendment application that NRC staff is currently reviewing.

In order to facilitate both its NEPA review and Section 106 consultation efforts, NRC staff is requesting a 1-week on site visit to the proposed Jane Dough site in September 2016. NRC staff anticipates that it will have 2-3 staff present. NRC's cultural resource subcontractor (Louis Berger) would attend. In addition to staff, consulting tribes would be invited to attend to support NRC's consultation efforts. NRC staff does not know at this time how many tribes would attend. However, NRC staff may limit the number of personnel from each tribe in order to use our time most efficiently.

The focus of the visit is to review and verify the findings of the Class III report and consult with the tribes. This is necessary for the NRC staff to concur with the findings of the report. Any additional information gathered during the visit will assist NRC in moving forward to the next steps in the Section 106 process. NRC staff must meet its obligations under Section 106 of the National Historic Preservation Act (NHPA). These obligations include consultation with the State Historic Preservation Office (SHPO) and interested tribes.

The flowchart below outlines the steps in the Section 106 process.



The NRC staff has completed Step 1, Initiation, and is working on Step 2, Identify Historic Properties, for the Jane Dough project.

During the identification phase, the NRC staff must consult with the SHPO/THPO on its identification efforts. Section 800.4 of the NHPA outlines the steps for identifying historic properties: (1) determining and documenting the area of potential effects; (2) reviewing existing information about historic properties; (3) seeking information from parties likely to have knowledge of or concerns about the area; and (4) gathering information from Indian tribes and Native Hawaiian organizations about properties to which they attach religious and cultural significance, while remaining sensitive to any concerns they may have about the confidentiality of this information.

NRC has delineated a proposed area of potential effect (APE) and has shared with the consulting parties and will be aided in accomplishing the remaining requirements through a site visit to the Jane Dough project.

Please let us know as soon as possible if Uranerz is able to support a site visit.

Thank you for your attention to this matter.

Ashley Waldron
Project Manager
NMSS/FCSE/ERB
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