

StrataRossKenExSEISCEm Resource

From: Ohms, Rene <rene_ohms@nps.gov>
Sent: Thursday, April 21, 2016 4:54 PM
To: Quintero, Jessie
Subject: [External_Sender] Re: Scoping Comment Letter
Attachments: DETO Scoping Comment Letter Strata Kendrick Expansion [4-20-2016].pdf

Hi Jessie,

Here is a copy of the letter that was sent.

I'll keep an eye out for Paul and Abe this afternoon! It's a beautiful day to visit the park. Hopefully things dried out enough at the Kendrick site to do the rest of the tour.

Safe travels home,

Rene

Rene Ohms
Chief of Resource Management
Devils Tower National Monument
(307) 467-5283 x212

Federal Register Notice: 81FR1243
Comment Number: 52

Mail Envelope Properties (CAGY-7sXXuiKdwqoVVHta2aS5fG1fiehmjEjBSpteQOWAwh9tNQ)

Subject: [External_Sender] Re: Scoping Comment Letter
Sent Date: 4/21/2016 4:53:38 PM
Received Date: 4/21/2016 4:53:54 PM
From: Ohms, Rene

Created By: rene_ohms@nps.gov

Recipients:
"Quintero, Jessie" <Jessie.Muir-Quintero@nrc.gov>
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MESSAGE	358	4/21/2016 4:53:54 PM	
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United States Department of the Interior

NATIONAL PARK SERVICE
Devils Tower National Monument
PO Box 10
Devils Tower, Wyoming 82714



IN REPLY REFER TO:

VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW

April 20, 2016

Jessie Muir Quintero
c/o Cindy Bladey
Office of Administration
Mail Stop: OWFN-12-H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Scoping Comments on Strata Kendrick Uranium Recovery Expansion (NRC-2011-0148)

Dear Ms. Muir Quintero,

The proposed Kendrick Expansion In Situ Uranium Recovery Project area is located approximately 10 miles west of Devils Tower National Monument. Depending on the physical characteristics and design of the proposed operations, mining, materials handling, processing, and transportation may impact resources and values of Devils Tower National Monument. In anticipation of the draft Supplemental Environmental Impact Statement, we provide the following scoping comments regarding potentially affected resources of Devils Tower, including dark night skies, natural sounds, viewsheds, and groundwater quality.

Dark Night Skies

Lighting associated with implementation of the proposed expansion has the potential to adversely impact the naturally dark skies of Devils Tower National Monument. Sky glow, also known as artificial sky glow, light domes, or fugitive light, is the brightening of the night sky from human-caused light scattered in the atmosphere. This glow can greatly detract from the overall darkness of the night sky and can inhibit people's ability to view celestial objects in the night sky. This sort of degradation can also impact wildlife habitat, wildlife behavior, scientific discovery, and cultural resources that relate to celestial objects.

The National Park Service (NPS) Night Skies Program collected baseline data at Devils Tower National Monument in 2006. This data showed an anthropogenic light ratio (ALR) of 0.13, which translates to a night sky that is only 13% brighter than a natural sky (free of artificial light). With a sky this dark, any additional artificial light added to the environment has the potential to adversely affect the cultural and biological resources of the park, as well as the

visitor experience. Twenty-six American Indian tribes hold ethnographic affiliation with Devils Tower (Bear Lodge) and consider it to be a landscape level Traditional Cultural Property (TCP). In the American Indian community, sky gods or spirits serve an important role, and many significant oral traditions relate to the night sky at Devils Tower. The protection of dark night skies is integral to the preservation of natural resources and cultural values at Devils Tower National Monument.

The National Park Service therefore recommends the following best management practices (BMPs) to reduce impacts to dark night skies:

- Light only where needed
- Light only when it is needed
- Shield lights and direct them downward
- Select lamps with warmer colors (less blue light)
- Use the minimum amount of light necessary
- Select the most energy efficient lamps and fixtures

To insure that the naturally dark night skies of Devils Tower are protected, we request the proponent conduct or sponsor light pollution and night sky monitoring at Devils Tower National Monument. The applicant or NRC can contact the park to identify optimum monitoring locations and protocols to monitor for potential impacts to the night sky and the visitor experience.

Natural Sounds

Anthropogenic noise from construction equipment, machinery and traffic can affect human environments, visitor experience and wildlife species. There are ample studies that show increases in noise can negatively affect mating, nesting, predation and other behaviors in a variety of wildlife species. Other studies show noise levels can affect the experience of park visitors and lead to a variety of social, psychological, and physiological changes. The proposed expansion project could create significant noise from construction, mining operations, and traffic. Low frequency sounds (those typical of a trucks, industrial equipment and machinery) travel further from the site of origin than other sounds.

Efforts to reduce noise from operation of the facility and ancillary equipment (e.g. power tools, construction equipment, and other machinery associated with the facility) should be implemented and noise reducing treatments (barriers, curtains, enclosures, silencers, mufflers, etc.) should be used where appropriate. Please refer to the National Park Service Acoustical Toolbox for recommendations for reducing noise impacts during these activities. This document recommends tools and technology for construction, maintenance and operation that reduce noise outputs.

Viewsheds

Visual impact of the proposed expansion project is also a concern for Devils Tower National Monument. Devils Tower is an 867-foot-high rock monolith, which is sacred to many American Indian tribes, and is climbed by approximately 5,000 rock climbers each year. The view from the summit is expansive, largely undeveloped, and natural. Natural viewsheds are a key

component of the visitor experience at Devils Tower; therefore, viewshed impact analysis should be conducted to determine what portions of the proposed expansion area are visible from the summit. Additionally, cumulative viewshed impacts from all development activities surrounding Devils Tower should be analyzed and incorporated into the draft SEIS.

The NPS recommends mitigations to reduce viewshed impacts, including painting infrastructure to match the surrounding environment, using colored building materials (including roofing), planting trees, and using the topography and landscape to create a visual buffer. In addition, nighttime activity and lighting should be reduced to the minimal amount possible during the typical climbing season of May - October.

Fugitive dust during construction is also a concern for both air quality and visual resources. Given dry, windy conditions, windblown fugitive dust could reach a 50-mile radius of the project site, including Devils Tower National Monument. The NPS recommends monitoring and adaptive management of fugitive dust minimization measures to ensure minimal impacts on local and regional air quality and visual resources.

Groundwater Quality

The proposed expansion project would result in additional liquid placed in deepwater injection wells, which could impact groundwater resources of Devils Tower National Monument. Devils Tower recommends that the draft SEIS including specific analysis regarding the proposed addition of any new injection wells, the amount of liquid to be injected over the proposed lifespan of the mine, and potential impacts to groundwater.

Thank you for the opportunity to provide scoping comments on the proposed Kendrick Expansion project. If you have questions or need further information, please feel free to contact Rene Ohms, Chief of Resources, at 307-467-5283 x212 or by email at Rene_Ohms@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Reid". The signature is stylized with a large, looped "R" and "D".

Tim Reid
Superintendent
Devils Tower National Monument