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FROM: Department of Agriculture Washington, D. C. 20250 T. C. Byerly	DATE OF DOC: 3-19-73	DATE REC'D 3-20-73	LTR X	MEMO	RPT	OTHER
TO: Mr. Muller	ORIG 1	CC	OTHER	SENT AEC PDR X		OTHER X
CLASS: (U) PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-410			
DESCRIPTION: Ltr trans the following:			ENCLOSURES: Comments on the Draft Enviro Statement for the Nine Mile Point Unit 2, from the Forest Service, the Soil Conservation Service & the Economic Research Service.			
PLANT NAMES: Nine Mile Point Unit 2			(1 cy rec'd)		Do Not Remove ACKNOWLEDGED	

FOR ACTION/INFORMATION 3-21-73 AB

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EXTERNAL DISTRIBUTION

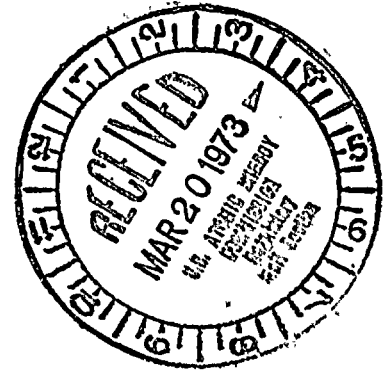
1-LOCAL PDR Oswego, N. Y.	1-DTIE (ABERNATHY)	1-NSIC (BUCHANAN)	1-ASLB-YORE/SAYRE WOODWARD/H ST.	16-CYS ACRS HOLDING	(1) (2) (9) NATIONAL LAB'S ANL 1-R. CARROLL-C, GT-B227 1-R. CATLIN, E-256-GT 1-CONSULTANT'S NEWMARK/BLUME/AGABIAN 1-GERLAD ULRIKSON...ORNL	1-PDR-SAN/LA/NY 1-GERALD LELLOUCHE BROOKHAVEN NAT. LAB 1-AGMED (WALTER KOESTER, RM C-427, GT) 1-RD...MULLER...F-309GT
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DEPARTMENT OF AGRICULTURE
OFFICE OF THE SECRETARY
WASHINGTON, D. C. 20250



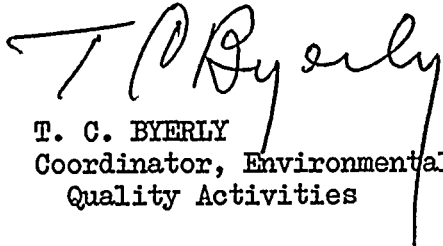
MAR 19 1973

Mr. Daniel R. Muller
Assistant Director for
Environmental Projects
Directorate of Licensing
Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Muller:

We have had the draft environmental statement for the Nine Mile Point Nuclear Station, Unit 2, Niagara Mohawk Power Corporation, reviewed in the relevant agencies of the Department of Agriculture, and comments from Forest Service, Soil Conservation Service and Economic Research Service, all agencies of the Department, are enclosed.

Sincerely,


T. C. BYERLY
Coordinator, Environmental
Quality Activities

Enclosures



[The text in this section is extremely faint and illegible. It appears to be a large block of text, possibly a list or a series of paragraphs, but the characters are too light to be read.]

U.S.) DEPARTMENT OF AGRICULTURE

Forest Service

Re: NINE MILE POINT NUCLEAR STATION

The station site, located between two existing units, has been previously cleared. The nine-mile transmission line involves a 120 foot widening of an existing right-of-way which was cleared before the State had developed environmental criteria. This widening will remove about 45 acres of forest.

Concerning the impact the draft states (page 4-2): "Considering the small area of the new right-of-way relative to the large amount of similar land, the impact during construction to terrestrial biota will be insignificant". We review draft after draft for proposed projects with similar statements. But as the landscape fills up with an accumulation of similarly "insignificant" transmission lines, highways, housing developments, shopping centers and industrial complexes, the cumulative effect on our environment becomes very significant. How is this recognized in these individual "insignificant" proposals?

For describing the more obvious impacts, the two pictures in Figure 2.2-4 of the Applicant's Environmental Report are more effective than all the words in the Report and Draft.

Page 5-1, last paragraph indicates that the proposed widening of the corridor will provide "forest recreation". This is not true; it will decrease forest recreation. The original corridor may have increased forest recreation by providing additional access to the forest edge, but even this is conjectural.

THE UNIVERSITY OF CHICAGO

DEPARTMENT OF CHEMISTRY

PH.D. THESIS

BY

ROBERT M. HAYES

IN

CHEMISTRY

1964

Soil Conservation Service, USDA, Comments on Draft Environmental Statement prepared by U.S. Atomic Energy Commission related to the Nine Mile Point Nuclear Station Unit 2, Niagara Mohawk Power Corporation.

1. Section 4.1.1, Second Paragraph

This paragraph notes that excavation and use of material will be such that erosion will be minimized. We suggest this paragraph be expanded to include a short discussion on stock piling, protection and reuse of topsoil. Methods to be used in minimizing could include prompt vegetating of disturbed area with appropriate vegetation, use of sediment basins, diversions, and properly designed surface channels.

2. Section 8.2.1

This paragraph says "theeland is not considered productive for agriculture." The soil in this area can respond quite well to modern agricultural methods. This sentence might be modified to say "the land is not presently being used for productive agriculture....."

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ECONOMIC RESEARCH SERVICE
UNITED STATES DEPARTMENT OF AGRICULTURE

ERS Review of the Draft Environmental Statement, Nine Mile Point Nuclear
Station, Unit 2, Niagara Mohawk Power Corporation

1. Paragraph 3 on page ii should clarify how much of the \$187.3 million investment can be separated from the operating Unit 1. The paragraph implies that a substantial investment has already been made for Unit 2.
2. The Applicant basically justifies Unit 2 on existing and projected growth rates of electricity consumption. Inasmuch as the production of electricity consumes natural resources and results in environmental change, we feel that the Statement should include a discussion of measures that the Applicant and the New York Power Pool of which it is a member, have under consideration to encourage more efficient utilization of electricity. Some measures which could have a significant impact on demand projections might include the reduction of demands for costly peak power through special metering, implementation of rate structures designed to promote more efficient consumption, and the revision of present utility promotional efforts.

Such a discussion would be compatible with NEPA Guidelines for environmental impact statements which require evaluation of alternatives to the proposed action. Recent interpretation of section 102:(2)(c) of NEPA held, in essence, that the range of alternatives required to be considered were those "reasonably available." None were to be ruled out, "merely because they do not offer a complete solution to the problem." NRDC v. Morton (D.C. Cir. 1972).

This discussion might be most appropriately placed in Section 8-1, "Not Providing the Power."

