



# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
Southern Illinois Sub-Office (ES)  
8588 Route 148  
Marion, Illinois 62959

FWS/SISO

November 14, 2019

Christine Pineda  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Christine Pineda:

Thank you for the opportunity to review and comment on the Final Environmental Assessment (EA) addressing the Proposed Renewal of Source Material License SUB-526 Metropolis Works Uranium Conversion Facility in Massac County, Illinois. The proposed project involves a re-authorization of the existing facility license for a period of 40 years. Alternatives for the proposed project include a no-action alternative and an alternative that allows the license renewal for a period of less than 40 years, called the reduced duration alternative. These comments are prepared under the authority of and in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.); the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.); and, the National Environmental Policy Act (83 Stat. 852, as amended P.L. 91-190, 42 U.S.C. 4321 et seq.).

## **Fish and Wildlife Resources**

Information in the EA indicates that there would be minimal terrestrial resource impacts from continued plant operation and there would be no major expansion of the existing facilities. Based on this information, the Service has no objection to the proposed Renewal.

## **Threatened and Endangered Species**

To facilitate compliance with Section 7(c) of the Endangered Species Act of 1973, as amended, Federal agencies are required to obtain from the Fish and Wildlife Service (Service) information concerning any species, listed or proposed to be listed, which may be present in the area of the proposed action. In the EA, you provided a list of species, which may be present within the project area that was obtained from the Service's Information, Planning, and Conservation System (IPaC). That list includes the endangered clubshell (*Pleurobema clava*), endangered fanshell (*Cyprogenia stegaria*), endangered fat pocketbook mussel (*Potamilus capax*), endangered gray bat (*Myotis grisescens*), endangered Indiana bat (*Myotis sodalis*), endangered least tern (*Sterna antillarum*), endangered northern riffleshell mussel (*Epioblasma torulosa rangiana*), endangered orangefoot pimpleback mussel (*Plethobasus cooperianus*), endangered pink mucket mussel (*Lampsilis abrupta*), endangered purple cat's paw mussel (*Epioblasma*

*obliquata obliquata*), endangered ring pink mussel (*Obovaria retusa*), endangered rough pigtoe (*Pleurobema plenum*), endangered sheepsnose mussel (*Plethobasus cyphus*), endangered spectaclecase mussel (*Cumberlandia monodonta*), threatened northern long-eared bat (*Myotis septentrionalis*), and threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*). Designated critical habitat occurs in the project area for the rabbitsfoot mussel.

Information provided in the EA indicates that the proposed action would not involve any significant changes to the existing facility operations and potential habitats would not be affected by facility operations; therefore, the proposed action is not likely to adversely affect the gray bat, Indiana bat, northern long-eared bat, and least tern. Based on the information provided in the EA, the Service concurs that the proposed license re-authorization is not likely to adversely affect the gray bat, Indiana bat, northern long-eared bat, and least tern. Information in the EA indicates that no known mussel beds occur adjacent to the action area and that water treatment and quality is improving; therefore, the proposed action is not likely to adversely affect any of the listed mussel resources. Based on the information provided in the EA, the Service concurs that the proposed license re-authorization is not likely to adversely affect federally listed mussel resources and is not likely to result in destruction or adverse modification of critical habitat for the rabbitsfoot mussel. Should this project be modified or new information indicate listed or proposed species may be affected, consultation or additional coordination with this office, as appropriate, should be initiated.

## **Conclusion**

Thank you for the opportunity to provide comment on the EA. For additional coordination, please contact me at (618) 998-5945.

Sincerely,

*/s/ Matthew T. Mangan*

Matthew T. Mangan  
Fish and Wildlife Biologist

cc: USFWS (Garland)